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Communication Principles v6 – April 2026

Demand Flexibility Service (DFS)

Introduction

These **Demand Flexibility Service (DFS) Communication Principles** are published pursuant to the **DFS Procurement Rules**. These principles relate to the marketing and branding of consumer facing products and associated processes related to the **DFS Initiation Measures** and other aspects of the **DFS Procurement Documentation**.

These **Communication Principles** have been developed alongside industry feedback to form a set of expected behaviours for all **Registered DFS Participants** to follow and are designed to help them and consumers to participate in **DFS** safely and effectively. Compliance by **Registered DFS Participants** with these **Communication Principles** is an obligation under the **DFS Procurement Documentation**. All bold terms used in this document have the meanings given in the **DFS Procurement Rules**.

Principles

1. **Use clear and simple language** – Target communications with the right level of information and avoid jargon and acronyms. Ensure that your communication and marketing are widely accessible; think about alternative language options and different communications channels to choose from.
2. **Be responsible** – Explain why the system sometimes needs more demand (e.g. high renewables, risk of curtailment) and sometimes less (e.g. peak stress). Avoid scaremongering about shortages or overstating the risks of surplus. Ensure customers are advised to shift their demand with reasonable lifestyle changes, not extreme measures. Where participating in demand turn up, it should be made clear that electricity should be used responsibly, not wasted.
3. **Be honest** – Do not exaggerate the frequency of events or the potential rewards. Be explicit that incentives vary and depend on system conditions. Be clear that data from past events does not guarantee future opportunities.

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4. **Ensure clarity** – Be clear who can take part and what they need to do and/or change to benefit from the rewards/incentives. Requirements (such as having eligible meter points, amongst other topics) are set out in the **DFS Procurement Rules**. Please ensure it is clear how to register and de-register as consumers can only participate with one **DFS** provider at any one time.
5. **Be safe** – Offer clear guidance on which appliances or processes can be safely adjusted to increase or decrease energy demand when required. Emphasise the importance of minimising unnecessary energy use (for instance, do not encourage boiling kettles without need); instead, recommend shifting or reducing non-essential loads such as electric vehicle charging, heating, cooling, or industrial operations.
6. **Be consistent with your guidance** – Ensure that all information provided (including analogies, comparison or examples) is clear standardised and relatable for your audience e.g. the target you need to reach is equivalent to x loads of washing etc – see Centre for Sustainable Energy ([CSE](#)) for more support.
7. **Provide extra support** – Some individuals or households may be experiencing difficulties and need extra support. Please signpost them to relevant support resources, where possible, and tailor messaging appropriately for known consumers based on their individual circumstances (for example Priority Service Register). Recognise that households in vulnerable circumstances and/or that have medical needs will require specific guidance.
8. **Provide consumer confidence** – A list of all **Registered DFS Participants** is published on our [Industry Information Website](#). If you are participating in **DFS**, please ensure your organisation has submitted the 'Registered DFS Provider form' to verify your status. NESO also recommends alignment to [FlexAssure](#) to provide consumer confidence in receiving a minimum standard of service from **Registered DFS Participants**.
9. **Share information** – Please inform NESO when your services will be live. If there are any changes to your campaign please notify NESO promptly so we can maintain accurate details of all **Registered DFS Participants**. Please notify NESO any changes via email at the following email address – demandflexibility@neso.energy
10. **Support NESO's Demand Flexibility Service** – Please state clearly that your campaign is 'Part of NESO's **Demand Flexibility Service**' and that data will be shared with NESO and local DNO networks. *Note:* NESO is the owner of the **Demand Flexibility Service**,

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however the end consumer agreements including campaign incentives are contracts entered into between the **Registered DFS Participant** and end consumers.

Further guidance

Below is additional information about NESO and the **Demand Flexibility Service** to support with Provider DFS consumer campaigns and messaging.

Positioning of NESO / Demand Flexibility Service (DFS)

- The National Energy System Operator, NESO, operates as an independent public corporation, central to ensuring reliable, clean, and affordable energy for all.
- Any references to The National Energy System Operator should use the term “NESO” not “the NESO” or any other variations.
- NESO is not a part of the National Grid Group PLC. Please do not use ESO, National Grid or Grid in your communications.
- Our consumer evaluation report Household engagement with the Demand Flexibility Service 2022/23 highlights a variety of domestic consumer experiences and motivations to participate in **DFS**. The Smart Meter Data Evaluation Report Winter 2022/23 builds on the previous report by analysing smart meter data alongside survey responses.

Provider campaign communications

- We recommend offering a dedicated online campaign landing page for **DFS** to support consumer engagement and understanding of **DFS**.
- Please state in your campaign communications that your campaign is ‘Part of NESO’s **Demand Flexibility Service**.’ This should form part of your secondary messaging.
- Offer a clearly visible mechanism to both register/opt in and de-register/opt out for **DFS**
- Ensure consumers are explicitly told that households/businesses can only sign up to one **Registered DFS Participant** at a time.
- If a consumer subsequently signs up to another **Registered DFS Participant**, they will no longer be eligible to participate in **DFS** with the previous **Registered DFS Participant** with whom they were previously signed up to. This should be made clear in both your terms and conditions and at acquisition stage.

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Encouraging consumers to participate appropriately and responsibly.

- Providers using Asset Meters for DFS must highlight to consumers that the domestic household Boundary Meter cannot participate directly in the service at the same time.
- When using **Asset Meters**, loads should not be shifted on to the **Boundary Meter** to manipulate the data for incentive gains. **NESO** has the right to de-register participants if this practice is identified.
- Ensure consumer facing contact centres/channels are fully briefed on DFS, and how your end consumers can participate in the service.
- All communications with end consumers should be between the **Registered DFS Participant** and the end consumer directly.
- If a consumer has a complaint, this should be raised directly with the **Registered DFS Participant** who the consumer is in contract with.

Emailing communications to consumers about DFS

Through industry engagement NESO acknowledge that Registered DFS Participants have faced challenges in maximising their reach to consumers due to legislation around marketing. Whilst NESO cannot provide firm guarantees or recommendations to be compliant in this space, we hope that the following information will be beneficial in your review of how to approach consumers that could be eligible for the DFS.

Based on the ICO’s published guidelines on electronic direct marketing NESO believe that it is possible for communications with existing customers to raise awareness about **DFS and flexibility services** provided they are presented as “service messages”, which can be sent to all customers, and not marketing messages which could not be sent to customers who had opted out of marketing.

The following paragraphs describe some of the considerations which NESO believe are relevant if the communication is to be a “service message”.

The ICO may view a message from suppliers/aggregators which actively promotes the DFS and encourages customers to participate as a marketing message, and not a “service message”, because explicitly or implicitly it is intended to encourage the customer to stay with that supplier/aggregator by taking advantage of the fact that the party offers the scheme. It therefore indirectly promotes the parties’ interests. The ICO guidance says that “If you want to send a message that actively promotes or

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encourages people to make use of a particular service, special offer, or upgrade, then it is likely to be direct marketing”.

NESO recognise that if communications about DFS are classified as “service messages” rather than marketing for the purposes of the electronic direct marketing laws that consent is not required for service messages. The ICO’s view is that a service message covers messages that aren’t promotional but are for administrative or customer services purposes, such as messages to remind customers how to contact the party in the event of a problem, service interruptions, delivery arrangements, to check their contact details are correct or update them on terms and conditions, etc.

The ICO gives the following examples of what may constitute service messages:

- factual information reminding customers of a benefit on their account but not encouraging them to use the benefit (e.g. reminding customers that their bank account includes free travel insurance);
- advising customers in a factual way of the options available to them at the end of their contract without encouraging or promoting one option over another; and
- automatic renewal notices that are worded neutrally and don’t encourage customers to renew.

The ICO’s guidance places emphasis on service messages being worded “neutrally”.

If **DFS** providers present their customers with factual information using neutral language to explain the flexibility of **DFS**, including what it is, why it was developed, and its purpose, as well as provide details on how customers can benefit from the service, this could be considered a service message.

NESO believe providers could legitimately also provide general factual examples of the benefits and savings that can be made and statistics about the take up of the service and its results to date, provided they do so in a neutral, factual way and are not actively encouraging the individual customer to sign up. Our [DFS Winter 2024/25 Overview Report](#) may provide a useful source of information for this factual data alongside our [DFS Utilisation Report](#).

Please note that marketing messages should not be sent to customers who have opted out of marketing consent. The ICO states “If you want to send a message that actively promotes or encourages people to make use of a particular service, special offer, or upgrade, then it is likely to be direct marketing”.

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Where marketing consent is not provided, NESO recommend that providers avoid the following:

- Implying that the service is a special feature of their service or a service they have devised themselves, or that they are the only (or one of only a few) providers participating (this may be viewed as an attempt to deter the customer from moving to another provider).
- Making the message in any sense “political”, for example implying that participating is a way to help the DFS participant achieve its ESG objectives by reducing carbon emissions for the public benefit. NESO do not however see why providers should not make general statements about the service operating for the benefit of society.

NESO recognise that this is a challenging topic. Whilst the above is intended to be guidance, it is ultimately the Registered DFS Participants’ responsibility to ensure that they comply with all relevant legislation when approaching and communicating with customers.

Useful links

- [NESO Demand Flexibility Service webpage](#)
- [Consumer Evaluation of the ESO Demand Flexibility Service Winter 22/23](#)
- [The Smart Meter Data Evaluation Report Winter 2022/23](#)
- [Electrical Safety First](#)
- [Centre for sustainable energy](#)
- [FlexAssure](#)
- [Information Commissioner’s Office](#)

Change log: [DFS Communication Principles v5](#) from Winter 24/25 have been used as the baselined document.