

Sent by email to [RIIOED2@ofgem.gov.uk](mailto:RIIOED2@ofgem.gov.uk)

16 August 2022

Dear Ofgem

**Ofgem draft determinations - Scottish Power Energy Networks**

Thermal Storage UK has responded to Ofgem's main consultation on the ED2 draft determinations. This short response is submitted in addition and relates only to the Scottish Power Energy Networks (SPEN) draft determination.

Thermal Storage UK supports Ofgem allowing SPEN to undertake anticipatory investment to support the uptake of low carbon technologies. It is important that people and businesses can install low carbon heating such as thermal storage which can provide flexibility to the electricity grid.

We note that Ofgem is not minded to accept the SPEN proposal to provide advice on smart meters and low carbon technologies. While there is some risk of overlap between DNOs and other market participants, we judge that it is important that an organisation provides this advice at the local level. The lack of an independent advice service to help people and businesses understand energy efficiency and heat decarbonisation is increasingly likely to be a barrier to the energy transition. We encourage Ofgem to work with the government and other stakeholders to prevent this barrier developing.

Best wishes

Tom Lowe

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**Thermal Storage UK**