



By email only:

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## **Ofgem's Forward Work Programme – 2023/24**

Dear Colleague,

I am writing on behalf of ESP Utilities Group, comprising the licensed gas transporter entities ES Pipelines Limited, ESP Connections Limited, ESP Networks Limited, ESP Pipelines Limited, and a licensed independent distribution network operator ESP Electricity Limited.

We welcome this opportunity to respond to the consultation on Ofgem's Forward Work Programme for 2023 to 2024. We support Ofgem's intent to protect and operate in customer's best interest and believe the consumer interest framework is robust and should provide a good base for identifying and assessing trade-offs. To this extent, we think it is appropriate for Ofgem to focus on the noted short term work priorities to achieve the principles of ensuring fair prices, creating resilience, and enforcing quality and standards.

We acknowledge that there may be challenges where work done in the short term which has long term benefits, are excluded by the consumer interest framework as the benefits will only be realised in the longer term. We would encourage Ofgem to ensure these opportunities to bring forward benefits are not delayed. The upcoming Distribution Use of System SCR is one area of work which has already been significantly delayed following it being de-scoped from the Access SCR last year. Given the number of widescale reforms which have occurred in recent years we are concerned that the current charging framework may not be suitable in appropriately recovering costs from the wider consumer base. Any further delay to this reform of charging arrangements could be compounding an issue for consumers, and we urge Ofgem to set out a clear plan and timetable for this work.

We welcome the focus from Ofgem in facilitating infrastructure investment. This is a key dependency for reaching the UK's Net Zero targets and an area of real concern, as constraints on the transmission system, and increasingly on the distribution system, are apparent. In addition, we believe Ofgem should seek to bring forward work on hydrogen. This is a vital area for a low-cost net zero transition and it is important that the full potential of hydrogen in helping achieve this is explored.

Should you have any questions or wish to discuss our response further, please feel free to contact me on 07587 553318 or at [brandon.rodriques@espug.com](mailto:brandon.rodriques@espug.com).

Yours sincerely,

Brandon Rodrigues  
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