

Response to Consultation

Connections end-to-end review of the regulatory framework

Introduction

We have focussed our response to this consultation on *Theme 1 - Visibility and accuracy of connections data and network capacity*.

High level perspective

We completely agree with the assessment of the problem relating to a lack of visibility and accuracy of connections data. Asset developers seeking to connect at all levels of the network are struggling to understand where they can connect their assets. This results in them putting in large volumes of applications that will not be taken forward. This in turn wastes both developer and DNO time and money and results in poorly sited assets.

There are three main problems here:

1. The data required for connections self-assessment is incomplete – there is more data required to enable self-serve grid assessments
2. The accuracy of the data is poor – making much of the data that is published of limited value to developers.
3. DNOs often publish similar data in different formats – there is very limited standardisation.

Whilst we agree with the summary of the problems developers are facing, we disagree with the proposed solution of a “Single digital view” of connections data.

The reasons we think the ‘Single digital view’ of data is a bad idea are as follows:

1. **It would crowd out innovation.** The idea of opening up network data was to facilitate the creation of a whole ecosystem of innovation that could be built on top of this data. This is starting to happen, however when the government and regulator proposes centralised solutions that compete directly with startups it not only directly crowds out those startups looking to offer similar solutions but also sends a chilling signal to any startup or investor considering innovating with network data that they might at any time have their business model destroyed by a government backed solution. This will likely result extremely low private investment in grid innovation.
2. **The lack of innovation competition will result in a poorer solution.** A lack of innovation competition resulting from a mandated single digital view tool will lead to a stagnant, one-size-fits-all solution that fails to meet the diverse needs of stakeholders. In a competitive environment, multiple providers develop and refine tools based on user feedback, driving improvements in usability, accuracy, and functionality. Without competition, the single solution risks becoming outdated, slow to adapt to emerging technologies, and less responsive to user needs. Moreover,

innovation often arises from niche or specialized providers who can tailor solutions for different segments of developers, investors, and grid operators—something a centralised, monopolistic platform is unlikely to achieve effectively. By restricting competition, Ofgem risks entrenching inefficiencies and limiting the potential for continuous improvement in grid connection assessments.

3. **Software product innovation is not where the networks' strengths lie.** Network operators excel at managing physical infrastructure and ensuring grid reliability. However, software product innovation is not their core competency. Historically, networks have relied heavily on external consultants and third-party vendors for digital solutions, rather than developing and iterating on software products in-house. This reliance often results in slow, costly, and less user-centric outcomes compared to technology companies that specialize in agile software development. Expecting networks to build and maintain a sophisticated digital portal for grid connections risks creating an inefficient, expensive solution that lacks the flexibility and innovation driven by a competitive marketplace.
4. **Innovation is required in this space:** Innovation is essential in this space because there is no simple definition of where capacity exists. At higher voltage levels, there is rarely "spare" capacity in a straightforward sense; instead, there are connection queues of varying lengths and complexities. Understanding the probability of projects in the connection queue to be delivered is required. Additionally, curtailment risks, with detailed assessments of how often and under what conditions connected assets might face constraints. A centralized solution, by its nature, is not suited to drive this kind of innovation. Instead, an ecosystem of specialized providers can develop dynamic, data-driven tools that evolve alongside the energy landscape, offering more sophisticated and useful insights than a one-size-fits-all central platform ever could.

Beyond these specific points, we would urge Ofgem and DESNZ to consider carefully when to intervene in the market for digital solutions in the energy sector. Carefully considered government intervention in digital markets can foster innovation, but poorly considered intervention can hinder it. Intervention is justified when it ensures open access to critical data, as transparency and standardization enable a competitive ecosystem where multiple players can develop solutions. Requiring networks to provide accurate, real-time, and standardized data is a positive step that removes information asymmetries and unlocks market-driven innovation. However, the government should not go beyond this by prescribing specific solutions or developing its own centralized platforms. Doing so distorts the market, discourages private investment, and stifles the emergence of diverse, user-driven innovations. Digital innovators need confidence that the government will create the conditions for fair competition—by ensuring open data—but will not directly intervene in the market to dictate or dominate the solutions that emerge.



We think there is a better way

An alternative to the single digital view that would deliver better outcomes for developers is a framework that incentivizes networks to provide high-quality, standardized, and accessible data. Rather than centralizing control over how data is visualized and used, Ofgem should focus on ensuring that networks make the necessary data available in a way that allows third parties to innovate and provide tailored solutions. This would create a more dynamic and competitive ecosystem that better meets the needs of developers.

The first key element of this approach is ensuring that networks provide the data required for **self-serve grid assessments**. Developers should have access to all the relevant information needed to assess grid capacity and connection potential without having to rely on direct interactions with network operators. This includes access to real-time network constraints, available capacity, queue positions, and reinforcement timelines.

Second, it is essential that networks are incentivized to **ensure data accuracy and timeliness**. One of the biggest challenges developers face today is the inconsistency and lack of reliability in the data provided by different network operators. If networks were held to clear, enforceable standards on data quality and update frequency, developers could make better-informed decisions, reducing speculative applications and streamlining the overall connection process.

Third, **networks must collaborate with each other to ensure data standardization**. Currently, each Distribution Network Operator (DNO) structures and shares data differently, making it difficult for developers to compare opportunities across different regions. A standardized data framework, supported by regulatory oversight, would ensure consistency across all networks, allowing for seamless integration into third-party tools and platforms.

By focusing on these three areas—data availability, accuracy, and standardization—Ofgem can create an environment where digital innovators and developers have the tools they need to make informed decisions. This approach would enable a competitive marketplace of solutions to emerge, where developers can choose from multiple providers offering the most effective grid assessment tools for their specific needs. This is a far more flexible and efficient model than a centrally controlled single digital view, which risks becoming an expensive, one-size-fits-all system that stifles innovation rather than enabling it.

Responses to Specific Consultation Questions

Theme 1: Visibility and Accuracy of Connections Data

1a. Do you agree with the issues we have set out under Theme 1?

- Yes. The current network data does not allow for accurate assessments of where there is spare capacity on the networks, which severely limits stakeholders' ability to make informed decisions. The lack of standardized data practices among DNOs exacerbates these challenges, creating inefficiencies and inconsistent outcomes.

1b. Do you agree with proposal 1a (single digital view tools)?

- We have captured our assessment of this proposal in the introduction to our consultation response.

1c. Do you agree with proposal 1b (guidance/standards for data visualization tools)?

- Establishing common standards for data access are essential for consistency and usability across regions. This will ensure stakeholders can rely on accurate and comparable data from all DNOs and the National Energy System Operator (NESO).

1d. Do you agree with proposal 1c (regulatory requirement to provide connections data)?

- Yes. A regulatory mandate is critical to ensure timely, accurate, and comprehensive data publication. This should include detailed 11kV network data, real-time substation headroom, and more accurate embedded capacity registers to enable better grid assessments.

1e. What are your views on the completeness and discoverability of connections data that would be useful to you?

- Connections data must be both comprehensive and easily accessible. Current data lacks granularity, particularly regarding demand projects, which are not transparently queued like generation and storage projects. Improving data discoverability and completeness is essential for informed planning and investment.
- Headroom data is not accurate at the moment.
- We would like much better shapefile data on cables at all levels of the network.
- We would like secondary substation data for all DNOs
- We would like better data on how different assets relate to each other
- We would like better data on the contracted capacity at different locations.
- We are building a sheet that captures the data that we would like from the networks, together with its availability. We are also planning on assessing the accuracy of different DNOs data as well. We can allow access to this [here](#).

1f. Is there additional connections data that would be of use but legal barriers prevent it from being published? If so, do you consider that there are solutions that would enable

this data to be made available, for example by aggregating it to appropriate levels / anonymising it etc.

- There is currently limited no access to the queue of demand projects waiting to connect. We have been told by DNOs that this is due to the Utilities Act that prohibits the provision of commercially sensitive information. We think this data should be published as it is no more sensitive than planning data that is routinely made public by default.
- We also think that there should be details on the milestones that projects in the embedded capacity register have met. This would allow for more informed understanding of queue dynamics.

1g. Is there anything else regarding Theme 1 – Visibility and accuracy of connections data and network capacity that you consider we have missed?

- It is critical to address the mismatch between the grid assessments stakeholders make using published network data and the grid offers developers receive from networks. This discrepancy undermines confidence in the process and highlights the need for collaborative efforts to identify and resolve these inconsistencies. We would be happy to work with Ofgem to demonstrate this mismatch and discuss how to rectify it.