



Independent Networks  
Association

To:  
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### **Market facilitator policy framework**

Thank you for the opportunity to comment on this consultation. I am writing on behalf of the Independent Networks Association (INA) who represent Independent Distribution Network Operator (IDNO) licence holders and Independent Gas Transporter licence holders (IGTs) that operate across Great Britain providing networks for customers in new housing developments, commercial and public sector facilities, EV charging, generation and storage facilities.

Independent networks compete against themselves and incumbents to provide networks for their customers. The use of competitive networks has grown significantly in popularity as, in order to win the business, they provide a tailored service to developers, working with them to provide agile solutions to enable them to progress their projects and enable growth that supports net zero goals in a timely fashion, at a time when we require a more dynamic and innovative approach to network provision.

In general, we agree with the proposal as set out. Specific comments relating to Independent Distribution Network Operators (IDNOs) are below:

**Q3. Do you agree with the proposed enduring roles and responsibilities for Elexon as market facilitator, in particular on working with NESO and inputting in NESO and DNO performance assessment? Q4. Do you agree with our proposed roles and responsibilities for key actors and on stakeholder and external scrutiny, in particular in relation to including a stakeholder survey, a stakeholder advisory board and an appeals process? If not, what would you change and why?**

It is unclear from the proposals as to how far it is expected that Elexon engages directly with IDNOs. Whilst they do not provide DSO services, IDNOs connect 80% of new homes to the electricity network. These increasingly have EV charging capability and will be fitted with low carbon technologies and, potentially, solar under the Future Homes Standard. New housing developments will therefore have the potential to be early flexible hubs, able to contribute to local energy markets. Increasingly IDNOs are also connecting generation, storage, solar and commercial operations at Extra High Voltage levels and directly into the Transmission system.



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IDNOs also have around two million customers attached to their networks. Understanding this sector and its customers will be important for Elexon.

It is also important that the independent sector understands the strategic leadership, direction and market co-ordination roles of Elexon and how far Elexon ensures that any technical outputs or rules, standards and processes affecting distribution operations are cost effective and proportionate. It is also unclear whether any DNO roles and responsibilities (set out on page 24) are expected to also be applied to IDNOs. The INA is currently represented on the Open Networks Challenge Group and given its role in electricity network operations, should be represented on the proposed Stakeholder Advisory Board.

**Nicola Pitts**  
**Executive Director**