Distribution System Operation (DSO) Incentive Report for Regulatory Year 1 April 2024 to 31 March 2025

Publication date:	26 September 2025
Contact:	David McCrone
Team:	Price Control Operations Policy
Email:	RIIOED2@ofgem.gov.uk

A new Distribution System Operation (DSO) Output Delivery Incentive (ODI) was introduced as part of our RIIO-ED2 Final Determinations. The purpose of the DSO incentive is to drive licensees to more efficiently develop and use their network, taking into account flexible alternatives to network reinforcement. From 1 April 2024, Ofgem is required to publish a Distribution System Operation (DSO) Incentive Report by 30 September each year.

This DSO Incentive Report for the reporting year 2024/25 sets out the distribution network companies' DSO Stakeholder Satisfaction Survey scores; the DSO Performance Panel scores; detailed performance panel feedback and the overall financial reward or penalty that each distribution network company will receive for the DSO incentive.

Any enquiries related to the text of this publication should be sent to Ofgem at:

10 South Colonnade, Canary Wharf, London, E14 4PU.

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1. Executive Summary

1.1 We introduced a new Distribution System Operation (DSO) Output Delivery Incentive (ODI) as part of our RIIO-ED2 Final Determinations.[1] The purpose of the DSO incentive is to drive licensees to more efficiently develop and use their network, considering flexible alternatives to network reinforcement. This will have the benefit of, amongst other things, avoiding or deferring network reinforcement whilst there remains uncertainty on future demand growth and results in lower costs within the price control period.

1.2 We are required to publish a DSO Incentive Report by 30 September each year for the previous regulatory year ending 31 March and which sets out the following:

- The distribution network companies' DSO Stakeholder Satisfaction Survey scores and rankings, including a breakdown by question, and the associated financial reward or penalty for each distribution network company.
- Distribution network companies' DSO Performance Panel scores and rankings, including a breakdown by DSO Performance Panel assessment criteria, and the associated financial or reward for each distribution network company.
- Detailed DSO Performance Panel feedback for each distribution network company. This explains how the scores were decided, subject to redaction of confidential information.
- The overall financial reward or penalty each distribution network company will receive for the DSO incentive.

1.3 This is the second DSO Incentive Report and this document fulfils the requirement to publish a report on the outcome of the DSO incentive for the regulatory year commencing 1 April 2024.

1.4 The DSO incentive consists of two Evaluation Criteria, equally weighed. These are:

- the DSO Stakeholder Satisfaction Survey, which intends to drive distribution network companies to become more responsive to their stakeholders' needs and improve service levels.

[1] RIIO-ED2 Final Determinations | Ofgem

- The DSO Performance Panel assessment that helps to reduce the information asymmetry between distribution network companies and Ofgem, brings in additional expert views, and provides industry with a platform to hold distribution network companies to account.

1.5 Table 1 below shows the total reward or penalty broken down by the two components of the incentive.

Table 1: The total reward or penalty

Licensee	**Survey Value (£m)**	**Panel Value (£m)**	**Total (£m)**
ENWL	1.52	0.62	2.14
NPg	0.50	2.07	2.57
NGED	7.46	7.46	14.92
UKPN	5.53	5.53	11.05
SPEN	3.51	1.78	5.29
SSEN	2.05	3.24	5.29

2. Background

Overview

2.1 The RIIO-ED2 price control sets the outputs that the 14 DNOs need to deliver for their consumers and the associated revenues they are allowed to collect for the five-year period from 1 April 2023 to 31 March 2028.[2] Outputs and incentives are a key part of the RIIO framework. They are designed to drive companies to focus on delivering the objectives that matter to existing and future consumers.

2.2 We introduced a new DSO incentive as part of RIIO-ED2. The aim of the DSO incentive is to drive licensees to more efficiently develop and use their network, taking into account flexible alternatives to network reinforcement.

2.3 Specifically, the DSO incentive framework is intended to evaluate performance against the Baseline Expectations for DSO that were set out in our RIIO-ED2 Business Plan Guidance[3], as well as the associated delivery of DSO benefits that emanate from these activities. It does so by embedding robust performance measures, capture stakeholder views and incorporate a more holistic assessment from a performance panel of technical and industry experts. The DSO Baseline Expectations correspond to the three DSO roles and five DSO activities set out in Table 2 below. The DSO roles and Baseline Expectations underpin the design of the DSO incentive framework.

[2] RIIO stands for Revenue = Innovation + Incentives + Outputs.
[3] Business Plan Guidance- chapter 4

Table 2: DSO Roles and Activities

Role	Activity
Role 1: Planning and network development	1.1. Plan efficiently in the context of uncertainty, taking account of whole system outcomes, and promote planning data availability.
Role 2: Network operation	2.1. Promote operational network visibility and data availability
Role 2: Network operation	2.2. Facilitate efficient dispatch of distribution flexibility services
Role 3: Market development	3.1. Provide accurate, user-friendly and comprehensive market information
Role 3: Market development	3.2. Embed simple, fair and transparent rules and processes for procuring distribution flexibility services

The DSO Incentive Evaluation Criteria

2.1 The DSO incentive was originally made up of three Evaluation Criteria. These were:

- The DSO Stakeholder Satisfaction Survey, which drives the DNOs to become more responsive to their stakeholders' needs and improve service levels.
- The DSO Performance Panel assessment helps reduce the information asymmetry between distribution network companies and Ofgem, bring in additional expert views, and provides stakeholders with a platform to hold distribution network companies to account.
- The Outturn Performance Metrics, which were intended to facilitate comparisons between licence areas and performance tracking over time against a set of key outcomes.

2.2 In our RIIO-ED2 Final Determinations, we decided that we would not implement targets for the Outturn Performance Metrics in Year 1 of RIIO-ED2. Instead, we stated that we would require DNOs to gather performance data on the metrics with the aim to set robust targets from Year 2 onwards. The DSO incentive for Year 1 of RIIO-ED2 would therefore be based on the DSO Stakeholder Satisfaction Survey and DSO Performance Panel assessment only. After comprehensive working group discussions and analysis over the course of

late 2023 and early 2024, we decided not to turn on the outturn performance metrics during the RIIO-ED2 price control, so they will not apply from Year 2 onwards.

3. DSO Stakeholder Satisfaction Survey Scores

3.1 The aim of the DSO Stakeholder Satisfaction Survey is to encourage DNOs to engage proactively with DSO Stakeholders to become more responsive to their needs and improve service levels. We expect that each DNO will use this feedback to inform their current business operations and in planning for future decision making.

3.2 For the purposes of the DSO incentive, DSO Stakeholders are defined as individuals or organisations that affect or can be affected by the DSO activities of the distribution network company. They may have a direct or indirect interest in DSO activities, and their interaction could vary in frequency.

3.3 This report includes the DNO's DSO Stakeholder Satisfaction Survey scores with rankings, including a breakdown by question, and the associated financial reward/penalty for each distribution network company.

The DSO Stakeholder Survey

3.4 Each of the DNOs is required to commission their own online survey from an independent and reputable market research company, which will undertake the DSO Stakeholder Satisfaction Survey on their behalf. Surveys were conducted in accordance with the guidance set out in the DSO Incentive Governance Document.[4]

3.5 The DSO Stakeholder Satisfaction Survey had five detailed questions asking DSO Stakeholders to score their experience. Each of the DSO Stakeholder Satisfaction Survey questions asked DSO Stakeholders to score their experience on a scale of one to 10. A score of one indicates that the DSO Stakeholder is very dissatisfied and a score of ten indicates that the DSO Stakeholder is very satisfied. DSO Stakeholders also had the ability to indicate if the scored question is not applicable. The questions were as follows:

- Question 1: What is the stakeholder's experience of the DSO's coordination with other network and system operators?
- Question 2: What is the stakeholder's experience of the provision of data and information provision?

[4] DSO Incentive Governance Document the decision on the proposed modifications to the RIIO-2 Electricity Distribution licences | Ofgem (located in "Subsidiary Documents – 17 February 2023 publication of Associated Documents and relevant issue logs.zip").

- Question 3: What is the stakeholder's experience of the DSO's support for flexibility market development?
- Question 4: What is the stakeholder's experience of DSO decision making performance; and
- Question 5: What is the stakeholder's experience of the DSOs approach to network planning.

3.6 The average (mean) score is based on the average (mean) score for each of the five DSO Stakeholder Satisfaction Survey questions. An example of this is provided in Table 9 in Appendix 3 of the DSO Incentive Governance Document.

The results for the 2025 Survey

3.7 DNO's DSO Stakeholder Satisfaction Survey scores are ranked in Table 3. Table 4 shows a breakdown by question and Table 5 outlines the associated financial reward or penalty for each DNO.

Table 3: DSO ranked Stakeholder Satisfaction Survey scores

Rank	**Licensee**	**Survey Score**
1	UKPN	9.59
2	NGED	9.03
3	SPEN	9.02
4	EWNL	8.86
5	SSEN	8.53
-	NPG	8.08

Table 4: DSO ranked Stakeholder Satisfaction Survey scores ranked by question

Question*	*UKPN*	*SPEN*	*EWNL*	*NGED*	*NPG*	*SSEN*
Q1	9.54	8.78	8.85	8.82	7.93	8.49
Q2	9.62	8.99	8.89	9.01	7.91	8.56
Q3	9.69	9.08	8.92	8.88	8.07	8.55
Q4	9.45	8.91	8.68	9.06	7.82	8.41
Q5	9.64	9.31	8.99	9.36	8.41	8.63

**The questions are listed above in paragraph 3.5.*

Table 5: The associated financial reward or penalty ranking for each DNO.

Rank	Licensee	Value (£m)
1	NGED	7.46
2	UKPN	5.53
3	SPEN	3.51
4	SSEN	2.05
5	ENWL	1.52
6	NPg	0.50

3.8 No DNO failed to achieve the minimum response rate threshold of 5% of its DSO Stakeholder population.

3.9 In March 2025 we updated the DSO Incentive Governance Arrangements. Where DNOs receive responses to the survey which they do not believe reflects a fair assessment of DSO activities in the relevant regulatory year, we allowed them to request that a response be removed by making a submission to Ofgem. We got two such requests in 2025. The target score for the DSO Stakeholder Satisfaction Survey will be set at 7.70/10, but with a lower deadband at 7.50/10 and an upper deadband at 7.90/10. The maximum reward will apply to a score greater than or equal to 9.00/10, and maximum penalty will apply to a score less than or equal to 6.40/10.

4. DSO Performance Panel

Introduction

4.1 This chapter sets out the DSO Performance Panel's ("the Panel's") assessment of the performance of the DNOs in their DSO activities for the year 2024-25. Individual feedback from the Panel for each DNO can be found in the Appendices to this report.

Purpose of the Panel

4.2 The Panel is formed from a mix of independent experts and DSO Stakeholder representatives. The Panel's role is to challenge and evaluate DNO performance in each year of RIIO-ED2 against the predetermined DSO Performance Panel assessment criteria.[5]

4.3 When a DNO clearly demonstrates that its performance against the DSO Performance Panel assessment criteria has gone beyond Baseline Expectations, then this should be reflected in an incentive reward. Equally, where a DNO has clearly failed to demonstrate that it has taken the necessary actions against the DSO Performance Panel assessment criteria to meet Baseline Expectations, then this should result in an incentive penalty.

4.4 The Panel provide a performance recommendation (in the form of a Panel Score) for each DNO to Ofgem, who review the available evidence to determine whether to impose a financial penalty or reward. For further details on the Panel's assessment process, please see the DSO Incentive Governance Document.

Panel members

4.5 The Panel is made up of the following individuals. Further information on each Panel member is available on our website.[6]

Independent experts:

- Gary Swandells, Director, Smart Grid Consultancy

[5] See Appendix 6 of the DSO Incentive Governance Document for full details of the evaluation criteria (Decision on the proposed modifications to the RIIO-2 Electricity Distribution licences | Ofgem - located in "Subsidiary Documents – 17 February 2023 publication of Associated Documents and relevant issue logs.zip")

[6] DSO Performance Panel: call for stakeholder evidence | Ofgem

- Jacopo Torriti, Professor of Energy Economics, University of Reading
- Jason Brogden, Director, Jason Brogden Consulting

Stakeholder representatives:

- Citizens Advice - represented by Andy Manning
- Association for Decentralised Energy (ADE) - represented by Gemma Stanley

Chair (non-scoring):

- Meghna Tewari, Deputy Director Analysis, Strategy Economics Research and Net Zero - Ofgem
- Nathan Macwhinnie, Deputy Director, Gas Sector Price Reviews, Network Price Control - Ofgem

Contextual factors to this year's assessment

4.6 The 2024-25 financial year is the second time the DSO Performance Panel assessment and review process has taken place. There was variation across DNO approaches to their submission this year, with variety stylistically and in the type of evidence used to demonstrate performance (e.g., what Key Performance Indicators (KPIs) were used, what key information was included, how information was presented). The Panel acknowledges that the evidence provided by DNOs increased in quality and their submissions were more standardised.

4.7 Regarding the call for evidence[7], stakeholder views are seen as a valuable part of the process going forward in RIIO-ED2. The DSO Panel Submissions and DSO Sessions made up the bulk of their evaluation this year, with the call for evidence mainly supporting their decision-making. In total 19 responses were received to the call for evidence, which was two less that last year.

4.8 The subsequent sections of this report highlight general trends across DNOs from the Panel's evaluation, outlining aspects of submissions that scored well and areas to improve, before detailing individual company feedback in the Appendices to this report. The general feedback also details the Panel's preferences for future submissions regarding the type and format of evidence included.

[7] DSO Performance Panel: call for stakeholder evidence | Ofgem

Panel scoring summary

4.9 None of the DNOs received an overall score of "Poor" or "Weak" this year. Despite this, there was still a level of variation across DNO results, both at a summary level and within individual scoring criteria. The Panel considered that there were performance differences demonstrated across all aspects of the evaluation criteria, with DNOs showing strengths and weaknesses across and within criteria.

4.10 Across the submission and presentation process, some companies were able to demonstrate clear evidence of the relative leadership of their DSO activities in accordance with the evaluation criteria – evidencing how their systems work in practice with case study examples, transparent and contextualised decision-making, and supporting evidence. Other companies have made less progress in their DSO activities, with a distance between them and their peers in certain scoring areas and provided less substantive evidence.

Areas to improve

1. Ensure DSO Panel Submissions match the requirements of the evaluation criteria

4.11 The Panel stressed that despite some good-quality submissions resulting in high scores, expectations regarding evidence will rise in subsequent years, with opportunities to improve the quality of submission content across all companies. There were improvements across the board in how the reports were presented, reflecting the comments made last year, but the Panel found that there were still areas for improvement.

4.12 Some submissions could improve by containing less generic information not relevant to the evaluation criteria. To improve future submissions, the Panel would still like to see all submissions become closer to a report in style, with their focus on the evidence needed to evaluate performance against the evaluation criteria.

4.13 Many responses were not balanced in terms of the scale of evidence provided against the evaluation criteria weighting percentage (see Table 3 in the DSO Incentive Governance Document). For example, the Panel would broadly expect 30% of the content to be provided for "Delivery of DSO benefits" and 10% for "Distributed energy resources (DER) dispatch decision making framework" given the evaluation criteria weightings.

4.14 In some submissions, there were common examples and evidence used across multiple assessment criteria, and it was not as easy as it should be to directly reference evidence across the report to specific evaluation criteria.

4.15 Similarly, for DNOs with multiple licensee regions, differentiation in performance across regions sometimes only became apparent under questioning, with balanced information not provided in the submissions. In the future, the Panel would like to see differences in performance across regions made more transparent and especially reasoning for presenting examples and case studies in the DNO reports.

2. Flexibility services

4.16 All DNOs have made progress in improving DER visibility and dispatch coordination. However, full real-time dispatch capabilities are still evolving, and the integration of DERs into NESO markets is not well evidenced. The role of local constraint management is inconsistently addressed, and dynamic constraint handling remains underdeveloped.

4.17 Greater transparency around dispatch decisions and performance outcomes is needed to support continuous improvement and stakeholder confidence. Evidence of DER participation in national markets should also be strengthened to demonstrate the effectiveness of integration efforts.

4.18 The Panel reiterated that more progress and ambition across commercial arrangements with DER, coordination with NESO, and developing areas like demand turn up is important. All of these factors are clearly set out as evaluation criteria and therefore require supporting evidence to be scored highly.

3. Flexibility markets

4.19 Each DNO's approach and perspective on resolving the complexity and fragmentation experienced by Flexibility Service Providers (FSPs) participating across flexibility markets (and the associated platforms) varied greatly. More needs to be done at pace, alongside the market facilitator, to progress high-impact developments that reduce complexity, barriers and costs. The Panel appreciate that there is a balance to be struck between convergence (and the risk of being constrained to move at the pace of the slowest) and striking out to deliver maximum benefit to customers through market innovation. Whilst convergence should not hinder innovative market development, it is important

DNOs and the market facilitator work at pace to improve the experience of FSPs participating across flexibility markets.

4.20 Flexibility services are being actively developed and deployed, but many initiatives remain in pilot or trial phases, limiting their impact. DNOs need to establish clearer pathways for transitioning these services into fully operational business-as-usual models.

4. Benefits methodology

4.21 The Panel acknowledges that there has been a big step forward in Year 2 with the collaborative benefits development work progressed through the ENA, but there is still significant variation in how this collaborative baseline is applied and the methodologies used between DSOs. For example, how the monetisation of carbon and societal benefits is considered in flexibility procurement and dispatch. The Panel would like to see more consistency and standardisation next year.

4.22 All the DNOs report substantial long-term benefits from their DSO activities, supported by structured frameworks and strategic planning. However, the ambition behind these benefits was reliant on wider initiatives such as NESO-led workstreams or modest, particularly in relation to flexibility-led deferral, which remains underutilised for some DNOs. The benefits reported are frequently qualitative and lack detailed quantification that reflects stakeholder-specific outcomes.

4.23 Although methodologies are generally sound and aligned with best practice guidance, such as the HMT Green Book, there is limited evidence of how innovation is being integrated into business-as-usual operations or how stakeholder engagement is influencing benefit delivery. Furthermore, year-on-year tracking of benefits is inconsistent, making it difficult to assess progress over time. Clarity of KPIs and evidence of regular monitoring, review & course correction should be provided.

5. Provide the full context to conflicts of interest processes, decision-making and actions

4.24 Governance frameworks and conflict registers are in place across all operators, but their practical application is not always evident. DNOs should provide concrete examples of how conflicts of interest have been identified and resolved in real-world scenarios.

4.25 DNOs should consider conflicts of interest more widely to look for barriers and risks to DSO participation that extend beyond DNO-DSO interactions.

4.26 The Panel recognises the variation in DSO governance models across the DNOs and would like to see more evidence that the governance models are subject to regular review and delivering the optimum outcomes for customers.

Best practice

4.27 Although there are some clear areas for improvement, the Panel judged there to be some clear examples of DNOs pushing beyond the Baseline Expectations and showing real leadership in the DSO transition. In this section the Panel would like to highlight some of the stand-out activities cross-network strengths demonstrated:

- The Panel recognised that all DNOs had responded positively to last year's feedback and demonstrated progress in turning it into concrete actions.
- Stakeholder collaboration: Some network companies were praised for their efforts to engage with local actors and other stakeholders, such as customer groups.
- The Panel confirmed that most DNOs have been able to show how benefits relate to individual years, KPIs and put monitoring frameworks in place which is an improvement from last year.
- Accessibility of Data: Some DNO's approach sets a benchmark for data transparency and stakeholder enablement. There was good evidence in the form of metrics and feedback in making data available in a variety of ways tailored to their customer and stakeholder needs.

Guidance for future DSO Performance Panel iterations

4.28 The following section provides an overview of panellist guidance for future iterations of the DSO Performance Panel. Although this guidance is not mandated the Panel strongly encourage its adoption to improve submission quality, resultant evaluation, and the broad value of the Panel process. Ofgem will take this guidance into consideration in any future consultations regarding the DSO Incentive Governance Document.

Submission evidence expectations:

- Provide evidence that demonstrates achievement of the criteria set out in Appendix 6 of the DSO Incentive Governance Document and make this easily traceable in separate sections relating to the sections in the scoring guidance.

- Ensure any decision-making, KPIs, metrics, cost benefit analysis and other discussed activities are substantiated and explained within the submission.
- Benefits Realisation is an area which should be improved on in going forward. The Panel expect to see greater standardisation, quantification, evidence of tracking frameworks, and performance against targets across RIIO-ED2 on a year-by-year basis.
- What has been achieved in the discussed year (whether it is completely new activities or a step up from existing activities) and the resultant benefits should be clearly demonstrated in that year's submission, together with year-on-year targets and achievements to deliver the overall benefits for 2023-2028.
- Year-on-year changes in performance and other DSO activities should be explained.
- The Panel would like to see clearly how DSO outcomes link to consumer benefits.
- For DNOs with multiple licensees, greater transparency is expected regarding any differentiation in performance and activity across regions and the rationale for this.
- The report for the year should be stand alone and include all the evidence relevant to assessment of DSO performance in the year. In assessing some submissions, the Panel felt that their existing knowledge of DSO activities or evidence from last year's submission was being relied on, rather than explicitly described and this resulted in reduced scoring or questions having to be asked in the presentation to obtain that evidence for the purposes of scoring.
- The Panel observed inconsistencies in how carbon and societal benefits are quantified across submissions. The Panels encouraged DNOs to take advantage of opportunities to work collaboratively to agree common application and update the Common Evaluation Methodology (CEM) and other DSO tools to reflect a consistent application of carbon and societal benefits.
- The Panel would encourage network companies to avoid relying on embedded links providing the evidence for scoring. Referenced evidence should be summarised in the report if needed to make the case for evaluation. Embedded links can serve as a navigational reference to resources where the Panel can validate claims or investigate more deeply if desired, but please recognise that as this makes the work of the assessor more time-consuming and challenging

and the Panel will not be in a position to review significant volumes of embedded linked material within the time constraints of evaluation.

DSO Panel Session suggestions:

4.30 Overall, the format of the DSO Sessions and discussions were deemed productive by the Panel. Despite this, the Panel suggest that the following process changes merit consideration:

- Amend the restriction on six questions. In practice, the Panel compressed multiple points into single questions, which may not have allowed for the clarity and depth intended.
- Extend the presentations by an additional 15 minutes as the presentations are key for gathering additional information to support scoring.
- DNOs to submit the presentations at least 72 hours in advance of the presentation day and preferably a working week before the DSO Sessions in timelines to allow panellist review of the presentations in advance.

4.31 We will give consideration to the Panel's suggested changes to the process. Any process changes would require a consultation to update to the Governance document. In addition, policy questions have been raised about broadening the scope of the Conflicts of Interests criterion, as described above. Ofgem will consider any proposals that may emanate from stakeholders and consult on them later this year if a modification to the criterion is deemed necessary.

The results of the 2025 Panel Assessment

4.24 The Panel's recommended scores rankings are as follows.

Table 6: The DSO Panel Assessment Scores

Rank	Licensee	Score
1	UKPN	9.36
2	NGED	8.45
3	SSEN	7.81
4	NPg	7.34
5	EWNL	6.71
6	SPEN	6.08

4.32 We have assessed the recommendations of the Panel and agree with their conclusions. The table below outlines associated financial reward or penalty as a result of the acceptance of the conclusions of the Panel.

Table 7: The associated financial reward or penalty ranking for each DNO.

Rank	Licensee	Value (£m)
1	NGED	7.46
2	UKPN	5.53
3	SSEN	2.24
4	NPg	2.07
5	EWNL	0.62
6	SPEN	0.14

5. Overall Financial Reward or Penalty

5.1 The overall financial reward or penalty each distribution network company will receive for the DSO incentive for 2023/24 is outlined in Table 7 below.

Table 8: The overall financial reward or penalty for each DNO.

Licensee	Survey Value (£m)	Panel Value (£m)	Total (£m)
ENWL	1.52	0.62	2.14
NPg	0.50	2.07	2.57
NGED	7.46	7.46	14.92
UKPN	5.53	5.53	11.05
SPEN	3.51	0.14	3.65
SSEN	2.05	3.24	5.29

6. Next Steps

6.1 We may review version 1.1 of the Distribution System Operation (DSO) Incentive Governance Document during the autumn if stakeholders suggest that changes are required. Specifically, we may consider the processes used to assess performance and any issues around the conflicts of interests criterion.

Individual feedback and scores

A1.1 Please find individual feedback from the DSO Performance Panel members below broken down by the main scoring criteria. The general feedback above should be considered by all network companies, even if individual feedback does not make specific reference.

Appendix 1 ENWL Feedback

Criteria	Comments	Score
Delivery of DSO benefits	The Panel's view was that ENWL's submission was an improvement on its 2023/24 submission, showing progress in all areas and a clear direction aligned to ambition, taking into account geographic characteristics. ENWL displayed a more structured commitment to delivering tangible DSO benefits. Among the key improvements were the broader use LV-level data, enhanced procurement signals and improved stakeholder governance. ENWL outlined initiatives that aim to align local energy needs with whole system coordination and signalled an ambition to scale flexibility. However, the Panel noted there remains limited evidence of how these translate into quantifiable outcomes, and much of the progress is framed in terms of course corrections and planned developments rather than realised results. ENWL mentioned the development of Local Area Energy Planning (LAEP) data sharing, digitalisation efforts, and local stakeholder engagement. The Panel commended the Social DSO as being a good initiative and is generally well explained and documented. Given the network characteristics of the North West, exploring the opportunity for Social DSO aligned to customer base seems reasonable. The Panel recognised that there were improvements in flexibility planning compared to 2023/24. However, the Panel noted that ENWL stopped short of publishing any KPIs against which performance should be measured. Whilst the list of key achievements is good, the Panel would like to see a structured set of KPIs, monitored on a year-by-year basis towards a final ED2 outcome. In terms of ambition, the Panel felt that much of the ENW DSO activity should be considered standard practice (e.g. community support, LV tendering and flexibility for peak reduction), but the Smart Street initiative is new, and it is good that this is operationalised as part of ED2 and can be recognised as a new operational benefit. The Panel recognised that there is a solid definition of benefits estimation with the publication of the DSO Benefits Methodology for the first time. Benefits are explicitly linked to a range of stakeholder groups, including vulnerable consumers, DERs, and wider society. Activities such as Smart Street, ANM, and co-ordinated development contribute to lower bills, improved access, and carbon reduction. However, the framework is not totally developed to the point where quantitative benefits are mapped on an initiative-by-initiative basis through to benefitting stakeholders. ENWL has used structured economic appraisal approaches, including NPV forecasts, carbon savings, and GVA metrics, referencing methodologies such as the HMT Green Book and CEM pricing benchmarks to support its analysis.	6.70

Data and information provision	ENWL's open data portal is live, well set out, easily navigable and increasingly aligned with best practice, featuring network capacity maps, fault data, and some localised forecasting. It has expanded its dataset portfolio to cover planning (e.g. DFES LV forecasts), operations (e.g. real-time power flows), and flexibility data (e.g. monthly dispatch data), thereby exceeding the DSO Baseline expectations. It has also enhanced accessibility and usability, with the Data Education Hub an industry leading initiative with leading tutorials, videos etc. The volume of datasets has increased, including new capacity headroom and connection queue data sets. There is some evidence of Local Authority engagement and tools to support local planning: Grid Charge Planner and Small-Scale Solar Project Planner tools. However, the portal's data sets remain relatively limited in comparison to sector leaders. There is limited integration of real-time data, and stakeholder engagement around data needs is only briefly described. ENWL are aligning their network models with Common Information Model (CIM) guidance and will share these with the NESO by 2026 in line with industry requirements. Robust data quality processes are in place, including automated data cleansing, triage protocols, NMS integration and adherence to Ofgem's Data Assurance Guidance and CIM standards, showing a structured approach to continuously improving data accuracy. Nevertheless, the Panel felt that data quality and assurance was more focused on internal than external processes. ENWL has also given consideration on how to adapt data and information provision to DSO Stakeholders' needs. Tools like the Grid Charge Planner and tailored insights for local authorities (e.g. LEVI support) show clear adaptation to stakeholder requirements.	7.30
Flexibility market development	The Panel acknowledges that ENWL's approach to flexibility markets is evolving, though it is still in the development phase. The submission referenced several tender windows and a roadmap for flexibility procurement. However, participation levels and impact of these tenders are not quantified. ENWL rolled out the ElectronConnect market platform, which is non-proprietary and recognised by Flexibility Service Providers (FSPs) across the market. It expanded its flexibility tenders to include short-term products, LV needs and to deliver capacity for connections. In 2024/25, it contracted, tendered and dispatched more than ever before and this is growing. Whilst this still remains well behind industry leading levels, the Panel noted the limited network needs in the North West. ENWL highlighted in their presentation that they were looking at proactive ways to engage flexibility within the restrictions they have from the characteristics of their network and connected customers. There is evidence of engagement with FSPs and participants in particular initiatives. The submission cited extensive stakeholder engagement through, bilateral meetings and marketing campaigns that resulted in increased registration and participation from new providers and communities. The Panel felt that while progress is being made, there is a lack of clarity around commercial models, and published outcomes. To facilitate market access, ENWL trialled a range of new flexibility products, dispatched more flexibility than ever before and	6.50

	developed a refreshed Flexibility Strategy and implemented the Electron platform. ENWL tendered for LV products for the first time, strengthened market engagement and enhanced contracting methods. Systems and infrastructure are set up to provide open access, standard data via API and standardised processes. The Panel noted that here has been an improvement in Flex utilisation. Postcode and cost checker tools were enhanced; monthly dispatch data and case studies are shared; LV flexibility tendering and Smart Street deployment was expanded. When directed to case studies in the submission the Panel were expecting to see historic record of successful initiatives over the past year, but these transpired to be theoretical scenarios. There was evidence of providing some operational data to NESO, but not using ICCP links and limited demonstration of coordination with NESO to enable DER.	
Options assessment and conflicts of interest mitigation	The Panel noted that there has been proactive engagement with other network companies and current / prospective network users to resolve network needs. ENWL engaged proactively with local authorities, other DNOs, NGET, NESO, and a wide range of stakeholders to develop coordinated solutions, including whole system planning and support for their LRE re-opener. It re-platformed and enhanced the CEM and Real Options Cost Benefit Analysis (ROCBA) tools. ENWL published the outcomes of their DNOA assessments, CEM tool results, and methodology documents on their website and Open Data Portal, ensuring transparency in investment decisions. There has been demonstrable structure to stakeholder engagement in the DNO's approach and measures some cross-vector, some proactive engagement and some wider system options assessment. ENWL consulted with DSO Stakeholder Panel and wider stakeholders, who provided feedback and challenge across key areas including their Governance Framework, ODMF, and DNOA outputs. A formalised DNO-DSO relationship (e.g. operational agreement, decision-making framework, DNO-DSO code) is in place. ENWL developed and published a DSO:DNO Governance Framework outlining at a high level formalised roles, decision-making processes, escalation paths and functional separation between DNO and DSO activities. However, the Panel felt that the rationale for Functional Separation model was at a very high level and qualitative and the review/assessment of the optimum model could be looked at in more detail. In addition, the formalised DSO-DNO Governance Framework is set out at a high level and a further level of detail in definition that exists in other DNOs should follow (e.g. Codes of Practice). ENWL has established an internal programme to scrutinise its DSO operating model governance framework. There are references to internal training and decision gates to support fair option consideration. There are limited examples in the submission of actual projects where flexibility has been chosen over reinforcement. While there is reference to organisational separation between DNO and DSO roles, there is a lack of detail on how conflicts are actively managed and reported or any performance statistics following the first full year of conflict identification and mitigation running.	6.60

Distributed energy resources (DER) dispatch decision making framework	ENWL has made strong progress in system integration and flexibility operations. Their key achievements include successful testing of integrated ANM and MOM systems and deploying ElectronConnect as the primary dispatch platform. The updated ODMF, embedded with ENA Primacy Rules, supports transparent decision-making. The Panel noted that their enhanced DER visibility through expanded monitoring and forecasting tools, further demonstrate operational maturity. However, ENWL's real-time DER dispatch capability remains limited. The Panel observed that there is no clear evidence of a scalable dispatch platform or formal prioritisation frameworks. Similarly, DER control is not yet active, and coordination with NESO is described as soft engagement rather than operational. Monitoring is also focused at HV level, with limited reliance on smart meter data. The ANM system, while described as business as usual (BAU), is not yet live, and the ICCP link is pending activation, although the Panel noted the position presented that this was waiting on NESO action. DER participation in NESO markets is still low, and liquidity challenges persist. While dispatch coordination efforts are emerging, many systems and protocols are still being set up.	6.20
Overall panel score		**6.71**

Appendix 2 NPg Feedback

Criteria	Comments	Score
Delivery of DSO benefits	Before providing feedback on the assessment criteria, the Panel would like to commend NPg for the overall quality, structure and content of their submission which was considered an exemplar submission and one which all DNOs should review on that basis before next year's reports. The Panel are of the view that that NPg generally demonstrated a high level of ambition and showed progress for its 2023/24 submission. NPg are clear on the DSO needs for their networks and how their DSO Strategy and ambition and Flexibility Strategy is tailored to deliver benefits aligned to the characteristics and need of their networks. The submission had a clear narrative on the need to balance cost, equity, and system transformation. It presented a socially responsible and inclusive DSO vision. There was a well set out rationale for the level of ambition for their networks and the focus areas for most benefits and some evidence of coordination across transmission and distribution and cross vector investment planning. A key achievement was enabling wider DER access and facilitating 300MW of renewable generation. The narrative included a focus on promoting wider system benefits to the extent they can and LA planning and interaction with other actors. The Panel found that there was limited evidence of operational delivery or forward planning capability and whilst this was well explained against the backdrop of network and customer characteristics, it did mean that higher scoring against some criteria could not be met. There were good explanations of why NPg has focused on connections and how use of flex products related to network needs, with a focus on longer-term planning to defer reinforcement. The panel noted that NPg provided a good outline of the customer benefits with evidence of the traceability of benefits but lacked consistent metrics to quantify these across the board. There was mention of flexibility and network alternatives, but no structured analysis to substantiate specific benefits or avoided reinforcements. There is evidence that it has quickly and proactively adapted existing plans and course-correcting. NPG has also proactively updated plans using stakeholder feedback, demonstrated by the creation of the "Powering Progress B2B Strategy" and flexible demand turn-up trials, course-correcting to unlock increased value and accelerate benefits. There was evidence demonstrating the promotion of wider system benefits, but the narrative was limited. The Panel also noted NPg's commitment to delivering LAEP+ tool into business as usual.	7.60

Data and information provision	The Panel noted that efforts to enhance data quality and governance are ongoing but improved this year on last year. This will ensure reliable and accurate information is available to stakeholders going forward. There were an impressive number of initiatives that have been carried such as the standardisation of substation names; alignment of forecasting standards with industry practices; data triage process that ensures transparency in data sharing decisions; the embedding of technical expertise within the open data team to maintain high data standards; a new enterprise-wide platform for scalable analytics of LV monitoring and smart meter data; the development of tools like AutoDesign and NIFT to streamline connection applications and forecast network needs; and the integration of third-party data into Distribution Future Energy Scenarios (DFES) for improved forecasting and planning accuracy. The Panel recognised that the OpenDataSoft approach is a sensible way to rapidly achieve 'good' and is to be commended, as it is the closest thing to a coordinated approach across the DSOs and generally well regarded by customers and stakeholders, but limits the ability demonstrate leadership. The Panel highlighted the significant improvements in the quantity of data and transparency of data triage. The data roadmap has delivered new data sets and information / views into the Data Portal. There was clear evidence of additional, high-quality data being shared in response to stakeholder needs, including real-time dashboards (e.g., LV monitoring, curtailment forecasting), integration of third-party datasets, standardisation improvements; and strengthened governance processes ensuring accuracy and granularity. In terms of accessibility, the Panel noted that NPg offering is amongst the best of the DNOs in terms of how the data has been laid out for the web-based tools. Despite this, there were some concerns around functionality that should be addressed going forward. It was recognised that there was a number of initiatives delivered that improved the accessibility of data. Among the initiatives was a Local Authority dashboard for accessibility of multiple data sets in a single place; Open Data Portal enhancements (feature pages, simplified descriptions, search improvements; and training resources to ensure a user-friendly and intuitive experience. There was clear evidence of how DSO Stakeholder engagement is being used to influence and improve provision. Data has also been made available in an accessible common format.	8.10
Flexibility market development	The panel recognises there has been evolution and progress in NPGs approach to flexibility markets and flexibility provision from last year. The Panel welcomed initiatives highlighted in last years' feedback, such as the Demand Turn-up (DTU) trial. NPg is incorporating previous best practice and pragmatically applying learning to narrow the gap with the industry leaders. It has fully implemented the latest ENA Open Networks Project deliverables, including standardised flexibility products, contracts, and baselining. NPg explained well why the use of those products is currently restricted to align to their particular network needs, but the lack of use of these products and the lack of opportunity to unlock value in nascent areas has to be reflected in scoring.	7.10

	Enhancements were made in response to stakeholder feedback, such as more frequent tender rounds and streamlined prequalification, and they adopted the latest contract version unamended to ensure consistency and reduce barriers for FSPs. There is clear evidence that NPg is unlocking the value of flex and energy efficiency in more nascent areas, e.g, constraints on the secondary (LV and HV) network. Increased coordination would enhance NPGs performance. Other positive aspects of NPg's performance was the incorporation of shorter-term flexibility into its strategy refresh to reflect short term market needs of FSPs. Scheduled Utilisation procurement was successfully tendered for reinforcement deferment. The use of the PicloFlex platform for FSPs gives a non-proprietary platform for participation in tendering. NPg is seeking to provide operational data to the GB System Operator and other DNOs in a practical and accessible way to provide visibility and to coordinate / avoid conflicts. NPg do not yet have an ICCP link in place for real-time data sharing with NESO, but this was described as waiting on NESO action, therefore the Panel looks forward to seeing progress on this next year. The Panel noted the preparation being done for when network needs drives more flexibility participation, but many of the initiatives described could not be assessed as directly related to market access.	
Options assessment and conflicts of interest mitigation	Improvements from last year have led to 1.6GW of projects progress at a faster pace by addressing transmission constraints and implementing connections reform processes. NPg proactively engaged with other network companies and current / prospective network users to address network needs. Some multi-sector engagement was demonstrated through its Regional Insights team, EV infrastructure support, and leadership in ENA groups. This ensured that local plans (e.g. LAEPs, housing allocations, industrial decarbonisation) were integrated into DFES, DLEs, and DNOA processes. This collaboration informed accurate forecasts and enabled early identification of network needs, thereby supporting efficient investment and flexibility procurement. DFES and NDP were emphasised in the submission, though Panel members felt that these are just standard regulatory processes. The Regional Insights team giving tailored local advice and the link of LAEPs into DFES a feature of 2024/25. The NDP Methodology, the Network Development Report (NDR), and the Network Headroom Report (NHR) were refreshed, providing a clear view of network developments. NPg enhanced forecasts to better anticipate future developments and align network upgrades with real development timelines. It also demonstrated executive level accountability and board-level visibility of DSO decisions. A formal governance framework was implemented with board oversight and executive accountability for DSO decisions, supported by an annual report to the Board detailing progress and key actions. A clear separation of DSO and DNO functions was maintained within the integrated structure, supported by the DSO Review Panel and a robust Conflicts Register. The formalised DSO-DNO framework is set out at a high level with Codes of Practice and a level of detail (that exists in other DNOs) still to come. NPg also demonstrated that it learned from other DSOs. Some stakeholder engagement was evidenced but not to the level suggested in the criteria and there could be better	7.00

	evidence for the choice of DSO governance model and a commitment to regular review to ensure the best value to customers. The Panel noted that there could be more narrative setting out everything NPg is doing to proactively identify any potential conflicts, document and monitor going forward. The conflicts register section in the submission was limited with less than compelling examples.	
Distributed energy resources (DER) dispatch decision making framework	NPg has laid strong foundations with the publication of its Operational Decision-Making Framework and use of the Flexible Power platform for scalable dispatch. It has improved DER visibility through a centralised generation database and enhanced infrastructure. However, operational progress remains limited. The ICCP link is still under development, although we note described as waiting on NESO action, and there is little evidence of active whole-system coordination or DER participation in NESO markets. The Panel would like to see a description of Real-time dispatch protocols and prioritisation mechanisms, and clear articulation of the benefits from the ODMF. Further description of the NPG strategy for operational visibility and control would support evaluation. Similarly, the Panel also noted that the submission lacks quantitative data on dispatch volumes and outcomes, and some sections appear repetitive, suggesting a need for clearer articulation of progress and impact.	6.20
Overall panel score		**7.34**

Appendix 3 NGED Feedback

Criteria	Comments	Score
Delivery of DSO benefits	NGED have built on a strong position from last year. There was a clear demonstration of ambition through planning and delivery of DSO outcomes and benefits, promoting wider system benefits, cross vector planning and DSO ambition. There has been progress that shows ambition across the acceleration of connections from acceptance of technical limits but connecting customers and related to flexibility. There also have been improvements to DNOA process realising increased benefits. The Panel noted, that as with last year there was an excessive number of embedded links and the report relied on implied knowledge and the banking of evidence from last year's report and in some areas. The presentation provided further evidence to support some of the references in the report (e.g. the rationale behind Year 1 and Year 2 performance), which could have been provided in the written submission. There is need for the report to be more self-contained with evidence from links summarised in the main report to make the case for evaluation and not rely on assessors to go access external resources. There was a lot of evidence of local authority coordination and planning, which is a very positive development. NGED reported significant monetary benefits for local authorities. It has embedded stakeholder engagement into its DSO Vision and Strategic Action Plan and aligned KPIs with cross-sector collaboration principles through the DSO Collaboration Forum. This supports regional planning and coordinated investment with local actors. There was a very clear articulation of quantified benefits down to a low level and robust KPI tracking. The DSO Benefits Quantification Methodology demonstrated a clear method and quantification of benefits. There is consistency with ENA Collaboration Group methodology and consistency with HMT Green Book. There was a good description of how Technical Limits and Releasing Headroom drives the majority of benefits and are essential for ED3, CP2030 and Net Zero. The additional outputs that NGED have delivered have directly benefitted customers by deferring a significant monetary amount in reinforcement costs, thereby reducing DUoS charge and accelerating the connection of renewable generation. This resulted in lower wholesale prices and carbon savings. There was limited evidence that NGED has made much progress this year in implementing innovation learning and projects into BAU.	8.50

Data and information provision	NGED continued to perform strongly on the scope, granularity and accuracy of data. There has been progress in improving the data provision since last year. There is evidence of extensive stakeholder engagement to enhance data through hybrid conferences, forums, consultations, and bilateral sessions with all local authorities. There was quarterly interaction via the DSO Stakeholder Panel to shape the data roadmap and delivery. NGED developed a "You Say, We Do" feedback loop with a reasonable response rate to a number of requests. There is a new Network Opportunities Map, which offers information on the available headroom at 190,000 substations across all voltage levels on its network. This tool enables developers to understand where they can connect and helps flexibility providers identify areas of opportunity for their services. NGED developed a transparent methodology in collaboration with its stakeholders. It has expanded the scope and granularity of the data it shares in direct response to stakeholder feedback. This includes the launch of the DSO Resource Centre and enhancements to the Connected Data Portal, which now hosts 88 datasets. It doubled the data catalogue over the year. Data offerings now include a Network Opportunity Map, Live Boundary Power Flows, and LV Insights Platform provide granular, real-time and future-looking insights tailored to stakeholder needs. In terms of accessibility, NGED has expanded API access and improved portal navigation. However, there are shortcomings in the accessibility front. If a user wants to access and interrogate data in the portal the provision is sub-optimal. There are no supporting statistics about the number of users, frequency of enquiry. The Panel expressed the view that it would be good to see evidence of any data partnerships where DSO is leveraging third party data to improve visibility and understanding beyond the network itself. In order for NGED to improve its score, further work would be required on its data portal. The Panel noted that CIM standards are being applied. The Panel welcomed NGED's initiative to set up a new DSO Scrum team focused on dashboards and the use of data.	8.40

Flexibility market development	The Panel was of the view that NGED continued to be a strong performer in flexibility market development. The Panel questioned the drop in zones launched and the presentation explained the rationale behind Year 1 and Year 2 performance and whilst there was a drop in zones launched (noting new 3 Demand Turn Up zones), the performance towards outcomes and benefits have increased. Clearer rationale should be provided in the written report in future. The submission for 2024/25 lacked some supporting evidence of how it is improving its flexibility platforms across procurement and dispatch, contract structures, or participant engagement. Volumes or the value of past flexibility events was not disclosed, although these should be available from the data portal and evidence was provided through the Panel presentation. This was an example of the report relying on implied knowledge, the referencing of data from embedded links/data and the banking of evidence from last year's report (as referenced above). The absence of a flexibility roadmap or operational pipeline undermines its readiness for greater DER penetration and capacity constraints in spite of the increase in pre-registered assets. There was clear evidence that it has unlocked the value of flex and energy efficiency in more nascent areas, e.g., constraints on the secondary (LV and HV) network. It brought 744 LV and 63 HV locations to market in the past year, explicitly targeting constraints in the secondary network. Enhanced LV assessment processes, especially in the East Midlands, have been used to identify more flexibility opportunities, responding to forecasted growth near key infrastructure. NGED is leading in some respects in areas such as dispatch, deployment, LV and HV and demand turn-up, but not in others such as platform owning. Access through Piclo to 302MW of flexibility is driving liquidity, lowering barriers to participation and unlocking greater competition. It has entered a Flexible Power Portal collaboration with SSEN and NPg for dispatch. It has moved its Dynamic/Scheduled Availability-Operational Utilisation product to Day Ahead dispatch to improve alignment with the Balancing Mechanism (BM) and wholesale markets. NGED has demonstrated a proactive and customer centric approach with good examples of Insights Report. While NGED demonstrates strong leadership, active implementation of Open Networks deliverables and continuous improvement in flexibility design, evidence of uniquely leading innovations or practices not yet matched by other DSOs is limited. Much of NGED's progress such as alignment with ENA standards, interoperability via Market Gateway, and joint work with UKPN is commendable and sector-leading. The Panel were of the view that while NGED is clearly among the leading performers, it stops short of showing distinctive, unmatched practices that would position it as the benchmark DNO in flexibility product and market design.	8.50
Options assessment and conflicts of interest mitigation	NGED uses the Common Evaluation Method (CEM) to assess a wide range of network constraints economically, considering asset replacement, new connections, and flexibility options. This ensures the most cost-effective and future-proof solutions are selected, with flexibility fully integrated into their optioneering process. The	8.20

	network options assessment has demonstrated how wider whole system options have been assessed to deliver identified needs at lowest cost. NGED has collaborated across network boundaries and with transmission and gas networks through initiatives like the Whole System Coordination Register and Regional Energy Strategic Plans. Its options assessment methodology was well set out, transparent with the results open and public. Last year NDP and DNOA enhancements have delivered a step change in both the detail it provides and the number of assets it considers in its analysis. The options assessment is driving improvements. There was some evidence of wider whole systems work, but this could be more extensive. The Whole System Coordination register incorporating data from other DNOs, Transmission Operators (TOs), NESO, and other essential stakeholders' strategic analysis across network boundaries, incorporating multiple licensees offers a more integrated, cost-effective approach. The outcomes of investment decisions are available on its website in a clear and accessible format. NGED publishes detailed NDP and DNOA documents and has launched a dedicated website to improve transparency, supported by regular updates and published governance documentation. Stakeholder engagement is embedded via workshops (e.g., governance-specific sessions), customer webinars and the Independent DSO Panel, which includes members with regulatory and market expertise and provides challenge and assurance. There is a signed DSO-DNO Functional Separation Arrangement that defines roles, responsibilities and commitments between both organisations. This is supported by an Operational Decision-Making Document, Guide to Governance and second-line assurance processes, forming a structured governance framework. NGED have highlighted different routes for where conflicts might arise and how they are resolved. The Panel were impressed that NGED were reporting conflicts with NESO over and above those with DNO. Following feedback last year there appears to be a concerted effort to identify several new areas where they are either scanning for risks as well, as stakeholder oversight of DSO DNO separation.	
Distributed energy resources (DER) dispatch decision making framework	The Panel considered NGED to have established itself as a leader in the industry by ensuring consistent and transparent dispatch logic. This is achieved through a combination of standardised methodologies, stakeholder engagement, and transparent publication of outcomes – resulting in dispatch rules being set out clearly and fairly. Coordination with NESO is evidenced, including ICCP link and information sharing. The Panel hope to see the work progress over RIIO-ED2 to help realise the benefits of more common solutions.	8.80

	NGED has made strong contributions to whole-system optimisation, notably through its MW Dispatch initiative with NESO, which helped avoid curtailment and accelerate connections. The company has published a transparent ODM framework and roadmap, improved short-term forecasting accuracy, and led industry efforts in dispatch standardisation via OpenADR 3.0. Similarly, the Panel noted that its coordination with NESO has been strengthened through enhanced outage planning and shared protocols. Although there are strong coordination efforts, DER integration has seen limited progress. There is minimal evidence of real-time visibility tools like ANM or telemetry integration, and DER curtailment practices are not described, without clarification and how this interacts with flexibility markets. This raises concerns about underutilisation of DER for system optimisation. While MW Dispatch is promising, details on volumes and frequency are lacking. The short-term forecasting case study lacks quantitative data, and it's unclear whether NESO actively uses the shared primacy data. As DER volumes grow, NGED's limited digital infrastructure may indicate a shift toward physical asset reliance rather than flexible resource optimisation.	
Overall panel score		**8.45**

Appendix 4 UKPN Feedback

Criteria	Comments	Score
Delivery of DSO benefits	UKPN continues to perform as a sector leader in its transition to a fully operational DSO. Its maturity in strategic planning, flexibility procurement, data transparency, and DER integration sets a high standard for peers. The level of ambition remains industry leading with metrics and practices well established into operations and a plan to over-deliver against ED2 targets which is on track. The Panel noted a number of key improvements in 2025 include broader use of LV-level data, enhanced procurement signals, improved stakeholder governance around decision-making transparency, clearer links between scenario planning and investment actions and stronger articulation of customer and societal value. They have embedded stakeholder input throughout their scenario and benefit realisation process. All areas of the submission demonstrate progress from 2023/ 24 and are well aligned with Ofgem's guidance. UKPN presents a strategic and well-integrated vision for delivering DSO benefits. Their approach to anticipatory investment, whole-system coordination, and Low Carbon Technologies (LCT) uptake forecasting is advanced. There is a programme of continuous improvement in place to continue to deliver benefits. UKPN demonstrates a proactive approach to regional cross-vector investment planning through its involvement in multiple coordinated initiatives with Local Authorities (LAs), Gas Distribution Networks (GDNs) and other stakeholders. There has been a step change in support to local authorities from the DSO. UKPN has focused on delivery of benefits to LAs through LAEP support and engagement across all regions. It has expanded engagement to include other stakeholders who benefit (e.g. Freeports). UKPN delivered a 17% increase in benefit over that 2023/24. The benefits have been quantified in line with the HM Treasury Green Book approach and Ofgem's established CBA methodology. Its published benefits methodology was updated in April 2025 in direct response to feedback from stakeholders. The tracking method is clear and improved from last year. Quarterly KPIs ARE monitored and published. Its KPIs and real time monitoring have led to tangible delivery improvements and investments. UKPN provided evidence of delivering additional outputs designed to maximise customer benefits, such as support for community energy.	9.40

Data and information provision	UKPN has a very good data portal, with the breadth of available datasets (including LV heatmaps and fault data), the quality of user documentation and API integration standing out. The Panel noted that it responded to last year's feedback by expanding LV-level visibility and improving metadata tagging and accessibility for developers. The majority of Data Sets are accessible by API as well as download and web-based analysis within the Opendatasoft portal. The Panel noted that the web tools can struggle to work with some of the larger data sets, but otherwise it is a very good and well maintained resource. There has been a 50% increase in the number of data sets and UKPN has demonstrated that they are tailored towards stakeholder outcomes and benefits. Data quality initiatives are in place and operational through the data triage board, data quality training and maintenance through operation. UKPN exceeded Ofgem data maturity framework expectations on all measures, but UKPN has not just measured against standards, they have used the framework as an opportunity to look for data improvements and this has been evidenced with switchgear monitoring. There is a dedicated data team within-house and partner capability to increment existing products and develop new products. UKPN has demonstrated a clear commitment to stakeholder-driven data provision by releasing new datasets and tools in direct response to user needs. For example, engagement with developers and local authorities led to the release of granular data on curtailment, data centre utilisation, and LV-level flexibility zones. UKPN has also provided accompanying methodology statements and user guides to ensure stakeholders can understand and apply the data accurately. There is clarity as to what is API available and what has methodology and data statements plus which are dashboards e.g. curtailment dashboard. The use of common sources of information is important, avoiding duplication or unnecessary expense to gain data from exclusive resources, so initiatives that use smart meters and other customer assets, to limit LV monitors whilst still enabling the data access/visibility required, is a positive development. In addition to providing datasets through the data portal and providing API access to data sets, UKPN have gone further in proactively developing data tools that are delivering customer benefits and provide the examples and evidence for that such as the Charge Point Navigator tool. The provision of tools like The Connections Lab and the Network Operational Data Dashboard (NODD) empowers users to access real-time or near-real-time network models and test connection scenarios dynamically. The consistent use of APIs allows DSO Stakeholders to automate their data collection.	9.30

Flexibility market development	UKPN demonstrates a mature and scalable flexibility market approach. Their approach supports open, scalable and competitive tendering, detailed procurement forecasts and a diverse mix of services across different timeframes. The submission includes evidence of long-term procurement contracts, geographic targeting, and participation across DER types. UKPN has directly addressed feedback about multi-year certainty and platform accessibility. There was 69% more flexibility available than last year, with 13GWh of flexibility dispatched and over 200 day-ahead auctions run. They have grown operational asset numbers five-fold, with 23% of capacity now coming from households. Simplification and automation have reduced registration times from months to next day for 87% of assets. Stakeholder engagement is a critical element of setting the direction for UKPN. This has been enabled through the of all Open Networks products and services; and standardisation of contract without exclusivity. UKPN has avoided using proprietary systems. UKPN is setting an industry-leading benchmark through its comprehensive, iterative and data-driven approach to designing and refining flexibility products, contracts, and processes. This includes automation of onboarding and dispatch, standardisation with other DSOs, API-first integration and open publication of dispatch data. ICCP links are in place and proactively used for whole system coordination and with the appropriate commercial arrangements in place. There is also coordination at control centre level. UKPN demonstrates a clear ambition beyond traditional DNO objectives by enabling flexibility as a tool for broader system optimisation and decarbonisation. The DSO has actively expanded access for new and underserved participants including domestic users, heat network providers, and community storage, while aligning day-ahead market operations with NESO. While UKPN demonstrate that they have gone beyond flex for network minimisation, management and restoration, there more that could be done in terms of accelerating connections, and wider system optimisation.	9.40

Options assessment and conflicts of interest mitigation	UKPN has robustly demonstrated economic and long-term efficiency by leveraging flexibility to defer very significant reinforcement costs and avoid unnecessary investment during low-demand periods. Its flexibility-first approach has enabled "right-sizing" of capacity based on real-time data and actual demand trends. UKPN incorporated energy efficiency and high-confidence LAEP inputs, so to successfully reduce projected RIIO-ED2 load-related expenditure, resulting in a 56% saving. This highlights the tangible option value flexibility provides over traditional reinforcement. The network options assessment has demonstrated how wider whole system options have been assessed to deliver identified needs at the lowest cost. The Distribution Network Options Assessment (DNOA) process incorporates cross-vector insights through stakeholder engagement, including partnerships with gas networks and DESNZ to assess hydrogen versus electrification pathways. Strategic forecasting down to LV level has enabled accurate evaluation of whole system impacts. Coordination with SSEN, NGED, NGET and GDNs supports regionally coherent development, while the proactive use of flexibility solutions and shared data demonstrates a whole system approach delivering cost-effective outcomes. UKPN's approach has been developed and validated through extensive DSO Stakeholder engagement and is backed up by compelling evidence. UKPN is applying best practice, learning from other network operators and updating its approach in line with wider industry developments. It has implemented international learnings (e.g., from the Dutch DSO) to evolve its flexibility strategy and smooth reinforcement volumes. Its DNOA methodology now includes long-term asset needs and strategic investment signals, aligning with emerging Ofgem and RESP guidance. The framework reflects maturity and is backed by examples of practical deployment. UKPN also demonstrated responsiveness to the feedback from last year, particularly regarding transparency in its decision rationales. UKPN plays a leading role in sharing granular forecast and network data, contributing to national policy decisions (e.g., DESNZ's heat pathways study) and industry reform. Its leadership in the rollout of Technical Limits is seen as exemplary, with calls for other DNOs to adopt its approach. The Panel would like to highlight that there needs to be more evidence of assessment and review of current model and how it is the optimum model to deliver benefits to consumers. The Panel were impressed to see a greater narrative around conflicts of interest. Going forward it would be useful to have any relevant commentaries from the independent external auditor that will be appointed this year, as it would provide even greater supporting evidence that the process is robust and UKPN is actively seeking to identify conflicts / resolution.	9.10

Distributed energy resources (DER) dispatch decision making framework	UKPN is recognised as an industry leader in DER visibility and dispatch, with full automation of flexibility dispatch and real-time data sharing with NESO. Also noted was its MW Dispatch service and dynamic outage management that have delivered 165 GWh of capacity and £22 million in benefits. UKPN's control centres integrate real-time telemetry across voltage levels, supported by ANM schemes and a robust decision-making framework. Monthly dispatch data is widely accessed, and stakeholder feedback confirms strong coordination and market transparency. No weaknesses were identified, but continued refinement of dispatch logic, deeper integration of performance metrics, and maintaining transparency as DER volumes grow will help sustain UKPN's leading position.	9.80
Overall panel score		**8.91**

Appendix 5 SPEN Feedback

Criteria	Comments	Score
Delivery of DSO benefits	The Panel found that SPEN's submission demonstrated a significant improvement over last year. SPEN outlined a strategic ambition to support decarbonisation and regional development with organisational change, a new DNO:DSO Operating Framework and an increase in DSO activity across the board. The submission acknowledged that a great deal of feedback was provided last year and that steps have been taken to carry out course correction and implement change. It put additional resource into supporting the improvements by getting an independent third party to calculate the benefits from DSO activities. It has built a comprehensive DSO benefits framework with the third party to track, quantify, and monetise benefits. The benefits framework is designed in line with established economic appraisal methods, such as the HMT Green and Magenta Books, and standard industry methodologies, such as the Common Evaluation Methodology (CEM). Common DSO collaboration benefits framework in use Theory of Change Methodology are being used. The social value of societal benefits is being used in stakeholder engagement to ensure that vulnerable customers are taken into account. SPEN are monetising societal benefit and this is being is being reflected in flexibility procurement and dispatch, but this is not universal across all DNOs and a consistent application should be considered. Nevertheless, the detail and evidence to demonstrate measurable benefits from DSO schemes is limited, there is a lack of specific KPIs or milestone tracking and insufficient evidence of stakeholder-driven outcomes. There is clear articulation of benefits, and while their submission aligns with policy direction and acknowledges responsibilities under the DSO role, there is more work required to demonstrate a clear, well-developed methodology for converting strategic vision into tangible, measurable outcomes, maximising customer benefits and realising wider system benefits. Compared to its peers, the approach lacks maturity in identifying specific investment strategies or progress milestones. The Panel noted there are a number of initiatives in train that cannot be fully taken into account in Year 2 but are planned to be operational in Year 3. Noting the improvement, it must be highlighted that SPEN still lags significantly behind its peers in realising DSO ambitions at this point.	6.00
Data and information provision	SPEN has significantly expanded its data coverage with 10 new datasets and 31 new data tables added in 2024/25. The Panel found that there is clear evidence that it is taking steps to improve data quality, with processes in place to address gaps in datasets and drive-up standards. In particular, there is strong evidence of systematic data quality improvements through Informatica, a dedicated Data Triage Framework and annual Data Quality Assessments. There is an increased breath and accuracy of data, use of smart meter data, sharing methodologies and some evidence of sharing data for stakeholder value. However, SPEN's data and transparency offer remains underdeveloped. While it publishes DFES and some supporting documents, there is no fully functioning open data portal or structured roadmap for expanding data access and no alignment with Energy Data Taskforce principles was evident. The Panel noted that information is not standardised or machine-readable, and that critical datasets such as hosting capacity, constraint forecasts,	6.90

	or DER visibility were missing. SPEN lags sector leaders significantly in this area. The Panel recognised that SPEN is improving the accessibility and availability of data and insight by creating data visualisations designed in line with user needs. SPEN has created five interactive dashboards which provide insights into its data and enable stakeholders to understand it better and more quickly. SPEN built on a comprehensive range of usability features such as advanced filtering, common formats aligned with industry standards and Application Programming Interface (API) access. It has also introduced guidance to support users in accessing and navigating the Open Data Portal by creating videos and materials to support their needs. However, the Panel found that access to data is generally disjointed with the resources broken up over several different web sites making for a sub-optimal user experience. There is the potential to improve the presentation of the data with added web tools in addition to downloads and API access.	
Flexibility market development	SPEN's development of local flexibility markets shows progress from last year, including an improvement in stakeholder engagement, an increase in Piclo asset registrations; the procurement of flexibility in line with ENA Open Networks Products, such as Operational Utilisation and Scheduled Availability; a new standardised settlement calculation methodology and the introduction of different products and services for different customers (i.e. month-ahead, day-ahead). SPEN delivers the full suite of ENA Open Networks products (e.g. Scheduled Utilisation at primary/secondary) and uses third-party, open platforms and publishes a market prospectus. There is evidence of learning from other DSOs. However, the Panel noted that there are still a number of shortcomings and that SPEN's flexibility markets remain in development. Compared to sector leaders SPEN lacks maturity in flexibility design, activity and engagement with providers. There are references to participation in innovation projects and future ambitions to enable markets which the Panel looks forward to seeing in BAU operation in later years. It was recognised that flex activity such as participation, procurement and dispatch increased, but only at a moderate rate. The Scottish ICCP link is operational, and the Panel looks forward to seeing evidence of the MANWEB ICCP link being operational next year, which was reported by SPEN as waiting on NESO action. The Panel acknowledges that there has been an increased effort to engage with potential providers and grow the operational capabilities. Publications like the new market prospectus clearly are helping the facilitation of market access. It dropped its participation thresholds to 0MW and standardised prequalification requirements to open up market accessibility. It is encouraging new FSPs: LAs, Councils. SPEN's Equiflex project, which aims to promote equal access to flexibility services for everyone, is engaging vulnerable customers in Liverpool & Glasgow. All flexibility contracts are standard ENA agreements with no exclusivity requirements.	5.80

Options assessment and conflicts of interest mitigation	SPEN uses a structured, transparent, and consistently applied Decision Making Framework, which is publicly available and updated with stakeholder input. This framework details how they assess all viable options, such as flexibility, reinforcement, and energy efficiency, using data-driven models and market-leading tools. SPEN publishes the outcomes through its Network Development Plan and DNOAs, ensuring stakeholders have full visibility into its process and rationale. The options assessment involves demonstrable cross-sector engagement, optioneering and planning. SPEN's network options assessment is underpinned by extensive cross-sector collaboration. In 2024/25, SPEN worked with 40 local authorities, devolved governments and industrial clusters to co-develop decarbonisation solutions. It applies consistent, industry-standard tools like the ENZ Platform and CEM to impartially evaluate network solutions. Its methodology includes modelling energy losses and valuing flexibility services with defined ceiling prices. There has been stakeholder engagement and SPEN has demonstrated that it has learned from other DSOs. While the submission sets out an Options Assessment, the Panel noted that the process published was at a high level. There is local authority engagement, but not cross sector. SPEN provides minimal detail on how it evaluates network versus non-network options, or how it ensures decisions are made in a neutral, evidence-based way. It was noted that there is a lack of transparency about SPEN's planning processes and it was not demonstrated that there is a separation of decision-making or oversight structure to mitigate bias toward capital investment. SPEN published its first Conflict of Interest Management Plan and DNO:DSO Operating Framework. However, the Panel noted that there are yet to be clear examples of the Conflict of Interest Plan being executed or any supporting conflict mitigation tools and the DNO;DSO Operating Framework is at high level and without the Code of Practice or similar level of definition of some of its peers. There is an independent oversight by SPEN's Independent Net Zero Advisory Council (INZAC) to ensures transparency, fairness, and continuous improvement of SPEN's governance practices. However, the Panel felt that conflict should be mitigated in process, rather than prepared for in process for resolution. The Panel had concerns that there could be an over reliance INZAC which has a much wider Net Zero remit, rather than focused on DSO scrutiny.	5.80

Distributed energy resources (DER) dispatch decision making framework	The Panel found SPEN to have largely provided evidence demonstrating achievement of the Baseline Expectations. DER characteristics were shown to be captured, stored and used in network planning model and an operational model used in control room, with network visibility strategy also in place (e.g. installing LV network monitors and integrating data from smart meters). The dispatch of flexibility is clearly set out in the decision-making framework and includes liaison with NESO, although via standard mechanisms. The Panel noted the ICCP link discussed is a TO link not DNO, impacting the scoring. Similarly, there are projects to fill data gaps, but these are innovation projects and therefore not taken into account here. The Panel found that SPEN has made notable progress in data gathering and governance processes. ECR validity improved significantly, and LV monitors were installed to enhance network awareness. Similarly, real-time monitoring is now in place for DER. Also, SPEN's decision-making framework aligns with ENA primacy rules and supports transparent, scalable dispatch via Piclo Flex. However, SPEN shows limited operational integration of DER. DER visibility is partial and not yet linked to real-time decision-making. ICCP links are not yet fully deployed, as noted above, and automation remains limited, with dispatch still largely manual. The submission lacks evidence of a curtailment strategy or increased DER participation in NESO markets. While foundational systems are in place, further integration and operational maturity are needed to match peer performance.	5.80
Overall panel score		**6.08**

Appendix 6 SSEN Feedback

Criteria	Comments	Score
Delivery of DSO benefits	SSEN's submission demonstrated a proactive and structured vision for their DSO function, with strong alignment to strategic decarbonisation goals. The Panel were of the view that it reflected an improvement on last year and that SSEN clearly responded to the feedback from last year on anticipatory investment and scenario modelling. Specific evidence includes expanded LAEP engagement, enhanced DFES granularity, and early adoption of whole-system planning principles. However, the pathway to translating planning inputs into operational prioritisation could benefit from clearer evidence of a quantifiable network impact or risk-weighted investment triggers. There should be more clarity on operationalisation of investment priorities and an explanation as to why there was such a substantial shift in savings values and other financial metrics since last year. SSEN has demonstrated a leadership role in regional planning and engagement through Local Authority engagement and Local Area Energy Plans (LAEPs) support. It has directly supported the development of LAEPs for two authorities and enrolled 94% of local authorities onto its Local Energy Net Zero Accelerator (LENZA) geospatial planning platform. However, the Panel did note that Local Authority support and the LENZA tool were referenced as evidence for a wide range of criteria throughout the report and the report would benefit from more targeted demonstration of specific case studies to criteria. With their focus on DSO Ambition within a landscape, SSEN have strongly considered the needs of stakeholder. The transparency on how DSO Performance Panel feedback has been actioned, as well as their own DSO Advisory Board was a very positive aspect. NESO, cross-vector and cross-sector collaboration was highlighted and evidenced. SSEN set out how benefits framework has been improved and defined with quantification of benefits through appropriate methods, including HMT Green Book. All sections of the report highlight benefits to consumers of each performance criterion. SSEN has delivered a broad range of additional outputs beyond its baseline RIIO-ED2 commitments, clearly aimed at maximising benefits for customers with course correction, including enabling 477MW of transmission-constrained flexibility demand to connect, unlocking system capacity for customers.	8.10

Data and information provision	SSEN has made visible progress in its data transparency and system accessibility over the past year. The company now hosts improved access to Distribution Future Energy Scenarios (DFES), heatmaps, and DER forecasting resources. This years' submission reflects continued implementation of its Digitalisation Strategy and a roadmap consistent with the Energy Data Taskforce principles. SSEN's online data environment has improved in scope, and public access to datasets such as hosting capacity and network reinforcement zones has been expanded. The use of smart meter and LV monitoring data was related to outcomes and benefits through enhanced network visibility, reducing reliance on costly modelling and equipment. Increasing data quality has been a key initiative of SSEN, underpinned by a newly formed Data Governance Steering Group. This is further evidenced with improvements to data assurance. SSEN have updated its data processes to deliver a four-fold increase in Level 1-assured datasets. CIM is still not in place, although SSEN have noted that their systems are ready. However, real-time data availability, API capabilities, and dataset interoperability with other platforms remain limited in comparison to leaders among its peers. There is also a need for improved feedback loops for data users and mechanisms to evolve data granularity over time. The Panel noted that there is clear evidence of how DSO Stakeholder engagement is being used to influence and improve data provision. SSEN has demonstrated a robust, stakeholder-led approach embedding feedback loops directly into the development and enhancement of its services. Engagement mechanisms such as roadshows, bilateral meetings, data surgeries, user surveys, and the creation of a "super user" group have ensured that datasets and tools align closely with customer needs. Specific stakeholder requests have led to targeted actions including the launch of tailored data surgeries (e.g., for Long Term Development statements (LTDS) and the Embedded Capacity Register (ECR)), a Network Insight series, power flow for Flexibility Service Providers and the development of enhanced curtailment data access through the Near Real-time Data Access (NeRDA) portal. However, the Panel had a concern that there has not been sufficient user testing, as some there are some technical issues to be overcome.	8.10

Flexibility market development	SSEN has made continued progress in enabling flexibility markets. The 2025 submission outlines active procurement of flexibility services across constrained zones, with evidence of evolving service products and improved visibility of market opportunities. In terms of facilitating market access, there is a new platform that standardises access for FSPs. SSEN has fully implemented the current Open Networks Project (ONP) deliverables across its flexibility services, processes, and contractual structures. SSEN has expanded its flexibility capabilities through the ElectronConnect and the Flexible Power platform. SSEN highlighted efforts to simplify and standardised onboarding for providers, including publishing eligibility guides and contract templates, though these remain somewhat generic. Furthermore, SSEN do not use exclusivity clauses facilitating service stacking and market liquidity in line with Open Networks best practice and Stakeholder-Driven Enhancements. The standardisation and data sharing has been done through strong collaboration with NESO and Elexon. SSEN are unlocking the value in nascent areas like energy efficiency and LV, by using innovation learning to tackle challenges in BAU. SSEN has also taken direct action in response to stakeholder feedback gathered through its DSO Advisory Body and extensive engagement with service providers. However, the Panel found that there is not enough evidence of unlocking the value of flexibility, as there are low levels of procurement. Furthermore, within the flexibility section of the report, there was an emphasis on flexible connections, which are not market-based flexible solutions. One of the most notable developments is SSEN's continued development of its 'DSO Accelerator Programme', which aims to streamline internal readiness for large-scale flexibility procurement and engage local aggregators. However, the full operationalisation of this programme and its impact on procurement efficiency is not yet clearly evidenced. SEEN placed a lot of emphasis on ICCP connections and coordination with Transmission and NESO but in examples this is a requirement to manage very limited demand headroom in some areas of the network.	7.70

Options assessment and conflicts of interest mitigation	The Panel noted that there has been proactive engagement with other network companies and current / prospective network users to resolve network needs. SSEN'S collaboration extended to neighbouring DNOs, where they have worked with UKPN, NGED, and SPEN in cross-boundary areas to support LAEPs. The outcome of its investment decisions are available on its website in a clear, accessible format. There is evidence of cross sector collaboration through Strategic Development Plan (SDPs). SSEN's achievements for Year 2 shows a strong improvement on Year. Strategic Development Plans (SDPs) have been an effective way for mid-term planning and ensuring the appropriate decisions are made through options assessment mindful of future impact to plan for supply chain constraints. The SDPs have been an effective way to identify expenditure requirements over the medium term. SSENs Options Assessment and DNOA methodology improved in year 2 and was used effectively. There was strong evidence of Transmission coordination for Whole System benefits in SDPs as part of options assessment. SSEN demonstrates a growing understanding of the importance of robust options assessment processes, aligning with whole-system principles. The use of Strategic Investment Toolkits, informed by Distribution Future Energy Scenarios (DFES) and LAEPs, indicates progress in embedding societal and whole-system value into appraisal methodologies. SSEN's internal governance requires consideration of flexibility services prior to conventional upgrades. Stakeholder engagement is embedded through regular consultations and active participation of the independent DSOAB, comprising experts from academia, policy, energy markets, and social justice. Their feedback has led to process improvements and adoption of best practices such as the Theory of Change. On the conflict of interest mitigation, SSEN outlines an approach that separates its commercial activities from network operation through functional ring-fencing and independent oversight. The internal DSO Governance Group reports to a board-level function, with annual reporting commitments to stakeholders. While governance structures for conflict mitigation are established, they are not fully independent. Stakeholder confidence mechanisms could be further formalised. There is almost an absence of anything material included in the report on which to base a conflicts of interest assessment.	7.30

Distributed energy resources (DER) dispatch decision making framework	SSEN was seen to have delivered substantial benefits through Active Network Management (ANM) system improvements and accelerated connections. It has published a strong Operational Decision-Making (ODM) framework developed collaboratively with NGED; enhanced its Seasonal Operability Reports, and established its first ICCP link with NESO, enabling access to DER. Also, its investments in LV monitoring and a new ANM latency standard show commitment to improving visibility and reducing curtailment. Collaboration with Independent DNOs and Independent Connection Providers is also a differentiator. Despite this progress, SSEN lacks a fully developed real-time dispatch strategy and prioritisation framework. DER visibility is still partial, especially at LV levels, and dispatch remains largely procedural. System capabilities like dynamic forecasting and automated control were noted as still in development in the report, although presented as further developed in presentation material. A clearer roadmap and continued progress are needed to achieve full operational integration and improve their scoring. For instance, the ambition and next steps for nascent or in development areas could be clearer, such as in the further development of LCM that SSEN highlighted multiple times.	7.60
Overall Panel Score		**7.81**