Consultation

Enhancing asset visibility: Distribution Network Operator Options

Publication date:	12 December 2025
Response deadline:	6 February 2026
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This document is a part consultation / part call for input on proposed new Distribution Network Operator licence requirements to maintain asset registers which support data exchange to improve asset visibility, as part of our commitment set out in the Clean Flexibility Roadmap.[1]

We particularly welcome responses from regulated parties including Distribution Network Operators (DNOs), the National Energy System Operator (NESO), Elexon, and Flexibility Service Providers (FSPs). We would also welcome responses from other stakeholders and the public.

[1] https://www.gov.uk/government/publications/clean-flexibility-roadmap

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Executive summary

In this consultation we seek views on our proposals to introduce new licence requirements on Distribution Network Operators (DNOs) to take a common approach to asset registration and maintain asset registers that support improved data exchange and increased asset visibility. This fulfils our commitments in the Clean Flexibility Roadmap, and forms part of our efforts to enable a smarter and more flexible energy system.

The rapid growth of consumer energy resources (CERs), such as electric vehicle chargers, solar photovoltaic (PV), and heat pumps, connected to distribution networks is outpacing the ability of DNOs to track installations of these assets.

Despite existing obligations, current estimates suggest that DNOs are aware of less than half of all CERs and distributed energy resources (DERs) on their networks. This is largely due to limitations to asset data collection. The Department for Energy Security and Net Zero (DESNZ) Call for Evidence on improving the visibility of distributed energy assets highlights unclear installer obligations, unclear monitoring and enforcement, and administrative burden for installers as areas for improvement to increase asset data collection. [2] We welcome DESNZ's response to the Call for Evidence and the policy set out to improve asset data collection.

Low asset visibility undermines network and system planning, reduces the effectiveness of flexibility markets, and ultimately increases costs for both network companies and consumers. The inconsistent approaches to asset data collection, storage, and sharing across DNOs further exacerbate these challenges, resulting in fragmented and incomplete datasets.

To address the inconsistency of asset data storage and sharing, the consultation proposes introducing a new licence condition requiring DNOs to adopt a common approach to asset registration. The scope of this intervention would cover small-scale DERs and CERs under 1MW, with a particular focus on assets below 50kW, which are least visible today. The proposals support taking a common approach to how asset data is stored and shared to unlock its full value for network planning, whole system planning, and wider industry use.

We set out the four options for delivering this intervention:

- No intervention: Rely on voluntary or market-led improvements, with the risk that data remains fragmented and progress is slow.
- Multiple standardised DNO registers: Each DNO maintains its own register but follows common data standards and interoperability requirements.

[2] Improving the visibility of distributed energy assets: call for evidence - GOV.UK

- A new central DNO asset register: A single, centrally managed register consolidates all asset data, simplifying governance and accessibility.
- Expansion of an existing/emerging industry platform: For example, expanding the Flexibility Market Asset Registration (FMAR) digital infrastructure to include DNO asset registration, leveraging existing digital infrastructure.

With each option assessed on benefits, risks, and deliverability, with a strong emphasis on interoperability, data quality, and alignment with related initiatives such as the Data Sharing Infrastructure, and Flexibility Market Asset Registration. The consultation also highlights the importance of aligning with government policy (notably the Department for Energy Security and Net Zero's work on installer obligations and data collection) and ensuring that any solution is suitable for integration with other datasets and platforms.

Stakeholder feedback is sought on the case for intervention, the scope of assets and data, the proposed options, and how best to ensure that asset registration data is accessible, high-quality, and supports the transition to net zero. The outcome will inform Ofgem's decision on whether and how to intervene.

1. Introduction

Section summary

This section outlines the structure and context of this consultation on Distribution Network Operator (DNO) Asset Registration. It outlines the purpose of the consultation, and provides guidance on how to respond.

Purpose of this consultation

1.1 We are consulting on our proposals to improve asset visibility through the introduction of a new licence condition requiring Distribution Network Operators (DNOs) to take a common approach to asset registration. We set out the proposed scope of this intervention, and the options we have identified for its delivery.

Context and related publications

1.2 The number of consumer energy resources (CERs) such as electric vehicle (EV) chargers, solar photovoltaic (PV) panels, and heat pumps, connected to distribution networks has increased significantly in recent years, and the speed of this rollout must increase to meet the Government's ambitions to achieve clean power by 2030 and net zero emissions by 2050. Alongside this, participation of these assets in flexibility markets is critical to unlocking the level of consumer-led flexibility required to deliver a smarter and more flexible energy system.

1.3 DNOs do not have a complete picture of the CERs and Distributed Energy Resources (DERs) connected to their networks, with estimates suggesting that less than half of all these assets are not known to DNOs. Limitations in asset data collection processes are a significant driver. DESNZ's Call for Evidence highlights several barriers to increasing asset registration, such as unclear installer obligations, unclear monitoring and enforcement, and administrative burden for installers as barriers.[3]

1.4 This significantly impacts the usefulness of CER and DER installation data to DNOs and National Energy System Operator (NESO), impacting the management and planning of their networks and the system, and reducing their ability to optimise network and system investment and support customer participation in the provision of flexibility services.

1.5 It is critical, therefore, that the visibility of CERs and DERs on the distribution network is improved, particularly ahead of the number of installations ramping-up towards 2030 and beyond. NESO's scenarios in the Future Energy Scenarios 2025 indicate that the number of EVs on the road could rise from less than 1.5 million to nearly 10 million by 2030 and up to 35 million by 2050, and the number of heat

[3] Improving the visibility of distributed energy assets: call for evidence - GOV.UK

pumps could rise from less than 0.5 million to around 2 million by 2030 and up to 24 million by 2050.[4]

1.6 There is a considerable amount of work underway looking at how to improve asset visibility, which we discuss in detail in Chapter 2 and which this consultation seeks to align with and complement.

1.7 In the Clean Flexibility Roadmap, Ofgem made a commitment to consult 'on new DNO licence requirements to maintain asset registers which support data exchange to improve asset visibility', which this consultation delivers.

1.8 To support these aims this consultation considers proposals to introduce new licence requirements on DNOs to take a common approach to asset registration and maintain asset registers that support improved data exchange and increased asset visibility.

Overview

Section 1 - Introduction

1.9 Section 1 introduces the structure and context of the consultation, including what is being consulted on and how to respond.

Section 2 - Improving Asset Registration: The Case for Change

1.10 Section 2 sets out our case for change, detailing why we believe this policy intervention is required. This includes our assumptions around related policy and technical developments, and what we see as key alignments elsewhere in the sector.

Section 3 - Defining the Scope of DNO Asset Registration

1.11 Section 3 outlines the scope of our proposed intervention, including our positions on which assets should be included, and our initial view on data items, standards, and collection. We also set out how accessing existing datasets could enhance the data held by DNOs. We set out several enablers and dependencies that will both support and underpin the scope of this consultation.

Section 4 - Options for Improving DNO Asset Registration

1.12 Section 4 discusses and seeks views on the four options we have identified for delivering a common approach to DNO asset registration, with our views on what we would expect to see from each option and the positives and drawbacks of each.

[4] Future Energy Scenarios 2025 | National Energy System Operator

Consultation stages

Instructions: Outline the key stages the consultation will progress through to get to a final decision. Mention any events or workshops your team may be running as part of the process. Use headings for each stage and give dates in dd month yyyy, with month fully spelled out.

Stage 1 Consultation open: 12 December 2025

Stage 2 Consultation closes (awaiting decision). Deadline for responses: 6 February 2026

Stage 3 Responses reviewed and published: Spring 2026

Stage 4 Consultation outcome (decision or policy statement)

How to respond

We want to hear from anyone interested in this consultation. Please send your response to flexibility@ofgem.gov.uk.

We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website.

Your response, data, and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information. For example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations, or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the United Kingdom's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

How to track the progress of a consultation

1. Find the web page for the call for input you would like to receive updates on.
2. Click ‘Get emails about this page’, enter your email address and click ‘Submit’.
3. You will receive an email to notify you when it has changed status.

A consultation has three stages: ‘Open’, ‘Closed (awaiting decision)’, and ‘Closed (with decision)’.

2. Improving DNO Asset Registration: The case for change

Section summary

This section sets out our case for change, detailing why we believe an intervention to establish a common approach to DNO asset registration is required. This includes our assumptions around related policy and technical developments, and what we see as key alignments elsewhere in the sector.

Current status of DNO asset registration

2.1 DNOs benefit from registering assets as it grants them granular visibility of their network. As a result, DNOs have more accurate data on localised demand and generation, which enables more accurate assessments of network utilisation. Increased registration of assets also benefits DNOs as it supports their decision making on planning and infrastructure reinforcement. In turn, this reduces costs for network companies and consumers.[5]

2.2 At present, there are variations in how DNOs collect, store and share asset data. These are outlined below.

Data collection

2.3 There are existing obligations on installers to register assets with DNOs. These are outlined in Engineering Recommendation (EREC) G98, G99, and G100, which are part of the compliance requirements under the Distribution Code. This provides DNOs with a primary source of asset registration data collection.[6]

2.4 Installers submit data to DNOs through different channels, such as the Energy Network Association (ENA) Connect Direct, bespoke DNO portals for asset registration, and directly via the Engineering Regulation G98, G99, and G100 forms.

2.5 Based on DESNZ's engagement with DNOs, the current visibility of installed assets is estimated at less than half, although the figure is difficult to estimate.

2.6 Alongside the data they receive directly, DNOs also pull data from other datasets to expand and validate their asset registers, such as the Microgeneration Certification Scheme (MCS) Installation Database (MID) and Department for Transport (DfT) data on EV charging infrastructure.

[5] Electricity distribution networks: Creating capacity for the future - NIC

[6] Distributed Generation Connection Guide: G98 & G99 / ENA EREC G100 Issue 2 Amendment 2 - Technical Requirements Customer Export and Import Limitation Schemes – Energy Networks Association (ENA)

Data storage

2.7 Each DNO stores the data it collects for its operational purposes, maintaining their own internal asset registers; a database of assets connected to their networks.

2.8 There is no agreed upon standard as to how data should be stored in a DNO's internal asset register. As a result, there are variations in how data is stored between each DNO. This includes both the format of the stored data is stored, and the data items contained within.

Data sharing

2.9 DNOs are obligated through the Distribution Connection and Use of System Agreement (DCUSA) to publish an Embedded Capacity Register (ECR) on a monthly basis.[7]

2.10 The ECR covers generation and storage assets above a capacity of 50kW. The ECR also covers demand assets with an import capacity of 50kW, provided that asset is subject to a Demand Side Response (DSR) contract. The data published in the ECR is publicly accessible, providing equal access and information to all energy stakeholders.

2.11 For assets outside of the ECR scope, asset registration data is not openly available. As such, a significant portion of CERs and DERs are not visible outside of specific data sharing agreements, which vary between DNO.

The wider asset visibility policy landscape

2.12 There are several initiatives, across Ofgem, DESNZ, NESO, Elexon, and industry which are aiming to tackle the issue of asset visibility. We outline key ones below.

ED3

2.13 In Ofgem, this includes our digitalisation proposals in ED3, which we expect will drive DNOs to tackle issues relating to asset visibility and associated data sharing. We proposed setting expectations on distribution network operators in the next price control period (ED3 which runs from 2028 to 2033) to improve asset visibility and access to dynamic asset data in the Sector Specific Methodology Consultation.[8] This expectation is focused on "driving improvements in both the baseline quality of static asset registration and the targeted application of dynamic asset visibility (near real time or real time monitoring of connected assets in operation)" with an expectation on DNOs to "demonstrate how they will

[7] Embedded Capacity Register | DCUSA / Revision to Embedded Capacity Register (ECR) to lower threshold for entries from 1MW to 50kW - DCUSA

[8] Sector specific methodology consultation: electricity distribution price control (ED3) | Ofgem (sections 1, 4 and 5)

complete and maintain DER/CER registration; this should support data sharing with NESO in a standardised format, fully integrate with FMAR requirements and comply with relevant licence obligations."

FMAR

2.14 Ofgem appointed Elexon as the delivery body for Flexibility Market Asset Registration (FMAR) in 2025 and is expected to provide digital infrastructure for the collection, storage, and sharing of data on assets participating in flexibility markets by Q3 2027.[9] This solution will initially be targeted towards registering small-scale assets (those under 1MW in capacity) and will collect data on assets when they are first registered into a DSO or NESO flexibility market.

2.15 FMAR will play a core role in future flexibility market data flows, which will streamline the process for flexibility enabled assets to be entered into multiple flexibility markets. Data will be collected once through data collection interfaces at the point of entering NESO and DSO flexibility markets. As such, the FMAR digital infrastructure will act as a single source of truth (SSoT) for assets participating in flexibility markets. Data can be accessed multiple times by authorised stakeholders across flexibility markets and will be fully aligned with DSI approaches. The FMAR digital infrastructure will also incorporate updates to the data if there are changes notified over time.

The Connections End-to-End Review

2.16 The Ofgem Connections End-to-End Review sets out decisions and proposals to change the regulatory framework around electricity grid connections.[10] This is a wide-spanning piece of work: the two biggest areas of overlap with this consultation relate to theme 1 (improving visibility and accuracy of connections data) and theme 6 (minor connections).

2.17 As part of theme 1, we have decided to require network companies to publish a Demand Capacity Register and will be tasking network groups to work with industry on a range of topics. We are also proposing to introduce new licence requirements to improve the quality and accuracy of network data, as well as leveraging Data Best Practice.

2.18 As part of theme 6, we have decided to develop minimum standards for DNOs on smaller connection requests and to align their processes. We will review reporting requirements and Connection Guaranteed Standards of Performance, as well as G98 limits. G99 and G100 policies and processes will be considered in parallel.

[9] Decision: flexibility market asset registration | Ofgem
[10] Connections end-to-end review: updated proposals and next steps | Ofgem

Data Sharing Infrastructure

2.19 The Data Sharing Infrastructure (DSI) is a socio-technical solution that enables secure and resilient data sharing at scale across the energy sector, between participants.[11] It is to be delivered by NESO as the interim DSI coordinator.

2.20 The DSI establishes identities and access levels, and ensures information sent cannot be read as it traverses the internet. Data is standardised into a common DSI format for exchange.

Consumer Consent Service

2.21 The Consumer Consent Service (CCS) will provide a common platform for consumers to grant and manage consent to share their energy data, providing consumers with "one version of the truth".[12] The CCS is being delivered by the Retail Energy Code Company (RECCo) and is scheduled to be operational by March 2027.[13]

NESO Transformation to Integrate Distributed Energy

2.22 NESO have been progressing their Transformation to Integrate Distributed Energy (TIDE) programme which aims to improve real time operations, market facilitation, and strategic planning for DERs and CERs.[14] NESO TIDE is working with industry to deliver policy, business capability and technology to enable real-time to long-term visibility of DER and CER data. NESO will collect, store and analyse this data to better forecast flows across the system and optimise system requirements.

Connect Direct

2.23 ENA's Connect Direct platform offers a single online form for installers to apply to connect and register low carbon technology installations with DNOs.[15] The platform is available for the installation of domestic solar panels, heat pumps, EV charge points and battery systems. It aims to remove friction in the low carbon technology connections process, by connecting installers directly to DNOs.

2.24 Whilst ENA Connect Direct is able to provide asset data from installer to DNO in a standardised format, DNOs still receive asset data from installers via other methods, such as manual applications. These are not always available in a standardised format.

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[11] Governance of the Data Sharing Infrastructure | Ofgem
[12] Consumer Consent Decision
[13] Consumer Consent Service - Retail Energy Code Company
[14] Transformation to Integrate Distributed Energy | National Energy System Operator
[15] ENA Connect Direct – Energy Networks Association (ENA)

Automatic Asset Registration

2.25 The Automatic Asset Registration (AAR) competition was a DESNZ initiative funded through the Net Zero Innovation Programme. It was designed to improve visibility of small-scale assets, such as EV chargers, solar PV and domestic batteries. The LCT Connect project, led by GreenSync, was one of 3 funded in Phase 1 of the competition, and was selected to deliver Phases 2 and 3, during which it developed a technical solution, including both AAR, a software module with the capability to interact with the users registering a new or existing asset and/or applying for a change of ownership or technical parameters of an already registered asset; and a Central Asset Register (CAR) a SSoT data repository for all relevant data of a registered asset.[16]

Embedded Capacity Register

2.26 The Embedded Capacity Register (ECR) forms part of the Distribution Connection and Use of System Agreement (DCUSA). DCUSA sets out obligations for DNOs to maintain and publish an ECR. Assets in scope of the ECR include generation and storage assets above a capacity of 50kW, as well as demand assets with an import capacity for 50kW, provided that asset is subject to a Demand Side Response (DSR) contract.

2.27 Under the DCUSA, each DNO must publish an updated ECR each month.[17] Each DNO's ECR is publicly available, ensuring consistent access of information for all stakeholders in the energy sector.

MCS Installation Database

2.28 MCS produce product and installation standards and certifies installers. The MCS Installation Database (MID) holds records of every MCS certified installation in the UK since 2010.[18]

2.29 The MID covers many of the assets outside ECR scope. Assets in scope for MCS certification are low-carbon electrical technologies (excluding EV chargers) such as solar PV, small-scale wind and battery storage up to 50kW, and low-carbon heat technologies, such as heat pumps up to 45kW.[19]

2.30 MCS are confident the MID represents a significant proportion of the assets within its scope.[20] Schemes like the Boiler Upgrade Scheme require MCS certification.[21] Our engagement with DNOs suggest that the MID has been a reliable dataset to conduct a gap analysis against to expand and validate their asset registers.

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[16] Automatic Asset Registration | Energy Systems Catapult
[17] Embedded Capacity Register - DCUSA
[18] MCS Installation Database - Home Page
[19] MCS Conformity Assessment Guidelines
[20] MCS Data Dashboard - MCS
[21] Boiler Upgrade Scheme (BUS) - Property owners | Ofgem

Department for Transport datasets

2.31 The Department for Transport (DfT) publishes data on EV charging infrastructure datasets, including EV charging infrastructure statistics, including publicly available devices and grants provided by the Office for Zero Emission Vehicles.

2.32 Our engagement with DNOs suggest that these datasets have been helpful as a reliable source to check against to gauge their update of EV charger asset registration.

DESNZ Call for Evidence on asset visibility

2.33 The Clean Power 2030 action plan highlighted insufficient visibility of distributed energy.[22] DESNZ, Ofgem and NESO set out measures in the Clean Flexibility Roadmap to address this.[23] DESNZ published their Call for Evidence on asset visibility in July 2025 and will respond by end-2025 with next policy steps.[24]

2.34 The DEZNZ Call for Evidence sought views on clarifying installer asset registration obligations while easing compliance through digital tools, leveraging smart meter data and industry datasets to identify assets, and reviewing DNO processes to standardise small-scale asset connections, data storage, and sharing.

2.35 Key challenges noted by DESNZ included unclear installer obligations to register assets with DNOs, the administrative burden of asset registration and variation in how DNOs collect, store and share asset data.

International Initiatives

2.36 There are a number of developments internationally on asset registration which are of relevance to the wider asset visibility policy landscape. In Australia, the Energy Market Operator's DER Register registers devices at installation to support grid management.[25] In Germany, the Federal Network Agency's Marktstammdatenregister registers generation and large consumption.[26]

2.37 The proposed EU network code on demand response includes a requirement on member states to establish Flexibility Information Systems, which would collect, store, and provide access to information on flexible assets, particularly to DSOs, transmission system operators, and flexibility service providers.[27] This Flexibility Information System is more conceptually similar to FMAR, but it is relevant as we propose integration across FMAR and DNO asset registration so learnings could still be relevant.

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[22] Clean Power 2030: Action Plan: A new era of clean electricity
[23] Clean Flexibility Roadmap
[24] Improving the visibility of distributed energy assets: call for evidence - GOV.UK
[25] Distributed Energy Resource Register | AEMO
[26] Marktstammdatenregister | Bundesnetzagentur
[27] Consultation: new Network Code on Demand Response - European Commission

How this consultation fits into the wider asset visibility policy landscape

2.38 The asset visibility policy landscape is broad and can be grouped into three main areas: data collection, data storage, and data sharing. As noted above, several initiatives are underway to improve asset visibility, some of which focus on improving collection of asset registration data, such as ENA Connect Direct.

2.39 Other initiatives, whilst not primarily aimed at improving data collection, have become valuable sources of asset visibility data. For example, datasets like MID are cross-checked against DNO asset registers. Where gaps are found, data from MID can be used to supplement and expand DNO asset registers.

2.40 Some initiatives aim to improve data sharing and storage, such as FMAR. However, its scope is narrower than that of this consultation. FMAR only covers assets registered for flexibility markets, whereas this consultation includes all CERs and DERs under 1MW.

2.41 Similarly, initiatives like the ECR have advanced the sharing of asset registration data, but exclude assets below 50kW, which represent a large portion of CERs, and some DERs. Together, these initiatives still leave a substantial gap in the asset visibility landscape when it comes to data storage and sharing.

2.42 This consultation looks at gaps that we feel are not being adequately tackled elsewhere: in particular, addressing disparities in how DNOs store asset registration data, as well as inconsistencies and barriers in the processes for sharing that data.

2.43 This consultation seeks to close that gap by introducing a new licence condition that standardises how DNOs store and share asset registration data, bringing greater consistency and harmonisation to these processes.

2.44 There is a strong link between our consultation and DESNZ's Call for Evidence. Specifically, our consultation builds on section 4.1: A review of DNO processes of the Call for Evidence. The Call for Evidence made clear that the true value of asset data can only be unlocked if the data is stored and accessed in a consistent manner.

2.45 We recognise that the quality of asset registration data significantly depends on the accuracy of the data that is collected at source, i.e. from installers to through to DNO. As such, we welcome DESNZ's position on clarifying installer obligations for asset registration, and on how compliance can be streamlined through digital tools and simplified processes. Strengthening data collection practices is essential to improving the overall asset visibility landscape, ensuring that the improvements to DNO data storage and sharing processes that we are consulting on are built on accurate and reliable information.

2.46 We will continue working closely with DESNZ as they develop policy on installer obligations and asset registration data collection, ensuring that our consultation on improving DNO asset visibility remains aligned and complementary to their proposals. We look forward to DESNZ's response to the Call for Evidence, as these insights will help to align our policy with wider policy objectives.

The case for a common approach to DNO asset registration

2.47 As discussed in DESNZ's Call for Evidence (in particular in section 4: Opportunities to increase visibility and access to asset data), improvements are needed in how data is stored and shared to unlock the full value of asset registration data.

2.48 Minimal progress has been made in taking a common approach to data storage and sharing across DNOs. We believe that intervention is needed to address the data quality and data accessibility, which we discuss in turn below.

Data quality

2.49 The lack of a common approach to data storage means that there are not consistent data items or data formats for how DNOs store asset registration data. As a result, asset registers vary across DNOs, reducing overall data quality.

2.50 The variance in how DNOs store asset registration data creates barriers to efficient data integration and comparative analysis, making these processes cumbersome and resource intensive. This, in turn, limits efforts to improve data quality across the sector. This ultimately hinders the ability to develop a complete picture of asset registration data.

2.51 Each DNO stores asset registration data in a way that best suits its own operations, but this approach does not support a unified, sector-wide perspective. This limits how effectively industry can make use of the data overall and is a barrier to unlocking the full value of DNO asset registration data.

2.52 We believe that targeted intervention to take a common approach to DNO asset registration data storage practices will enable standardisation and interoperability of data and so improve overall data quality. This will ensure that asset registration data is stored in a common format, compatible with relevant digital infrastructure, and can be used seamlessly across different platforms, reducing duplication of effort.

Data accessibility

2.53 Current practices for sharing asset registration data are inconsistent across DNOs. While each DNO is required to publish an ECR on a monthly basis, there is no such requirement for assets under 50kW. As a result, there is limited data available for these smaller assets, which make up a significant proportion of CERs and DERs.

2.54 Currently, data sharing practices remain fragmented, opaque and inconsistent. Each DNO has its own bespoke data sharing agreements, which are resource-intensive to negotiate at scale, creating an onerous process that adds costs and delays. This is a clear barrier data accessibility and it limits industry stakeholders' ability to make effective use of asset registration data.

2.55 We believe that targeted intervention to take a common approach to DNO asset registration data sharing practices will increase data availability and remove barriers to data accessibility. This will allow asset registration data to be seamlessly exchanged between relevant digital infrastructure and industry stakeholders.

Policy outcomes and benefits

2.56 Our intervention aims to achieve two core policy outcomes:

- For asset registration data to be stored in a common, interoperable format and for data to adhere to agreed data quality standards, improving data quality and consistency
- For asset registration data to be shared in a common, interoperable format with appropriate security measures, enabling efficient accessibility of data

2.57 A common approach to DNO asset registration will deliver these two policy outcomes, which will provide the following benefits. It will be easier for DNOs to use asset registration data internally across different teams and functions. It will be easier for DNOs to share data externally, with NESO, FMAR and relevant industry stakeholders. A common approach to data storage and sharing will align better with, and also support, a common approach to data collection.

The case for intervention

2.58 Our case for intervention is this: collecting large volumes of asset registration data is not enough. Without a common framework to standardise how that collected asset registration data is both stored and shared, issues with data quality and data accessibility will persist. Asset registration data will remain siloed and inconsistent, severely limiting its usefulness to DNOs and other industry stakeholders.

2.59 Therefore, without targeted intervention to improve how DNOs store and share asset registration data, our view is that our policy outcomes and industry benefits will not be achieved.

Use cases supported by DNO asset registration

Key use cases - DNOs, NESO and flexibility

2.60 A common approach to storing and sharing DNO asset registration data supports a number of use cases, which are covered below. Of these, DNO network planning and NESO whole system planning are the primary focus of this intervention. However, other use cases are also supported.

DNO - network planning

2.61 DNOs require better visibility of CERs and DERs to support data-led decision making for network planning and reinforcement decisions. It supports their ability to coordinate across both consumer and network assets to efficiently integrate both and maintain grid stability.

2.62 Standardising how asset registration is stored and shared will improve DNO's network planning capabilities by improving the quality of the data. Accessibility and integration of asset registration data with other digital infrastructure and wider datasets is key. This will enable DNOs to better identify and integrate missing asset data, improve data quality, and increase their overall asset visibility. It can also help drive better alignment of network planning assumptions and asset uptake forecasts across DNOs, through data sharing.

2.63 A higher level of asset visibility will support a better understanding of network utilisation and support cost-effective and efficient network investment decisions, avoiding network overbuild and allowing for better targeting of infrastructure reinforcement.

NESO - whole system planning

2.64 A common approach to how DNOs store and share asset registration data will support NESO's whole system planning, providing them with an accessible, up-to-date, comprehensive understanding of what assets are in which regions and their energy requirements. This will support NESO's role in the development of Regional Energy Strategic Plans (RESPs) and the Strategic Spatial Energy Plan (SSEP).

2.65 NESO is taking a strategic, long-term approach to planning; identifying whole energy system needs to ensure that the system can be designed and built accordingly.[28] Taking a common approach to DNO asset registration will improve data quality, data consistency, and data accessibility.

[28] Strategic Planning | National Energy System Operator

2.66 Improvements to data quality will increase the accuracy of baseline models, in turn helping NESO improve the accuracy in their whole system planning, supporting their market design, and restoration and resilience responsibilities.

2.67 Data consistency, will make system planning easier as a consistent approach across DNOs will enable NESO to easily access data on DERs and CERs across all networks in a uniform format, ensuring consistency across different regions.

2.68 A common approach to data access across DNOs will mean that NESO can seamlessly integrate data without needing to account for differences between each DNO. A common, interoperable framework will enable NESO to seamlessly pull data from different regions to establish a unified view of the whole system, reducing the need for manual intervention from NESO for data compilation.

Flexibility market enablement

2.69 Taking a common approach to how DNO asset registration data is stored and shared enables several benefits for flexibility markets. As asset registration data becomes harmonised, more accessible and of higher quality, this will enable DNOs and NESO to consider where flexibility markets could by used, and, with appropriate consumer consent, enable Flexibility Service Providers to consider where consumers might benefit from flexibility services, aiding the growth of flexibility markets.

2.70 Improved data storage and sharing practices will lower barriers for new flexibility market entrants by making asset onboarding easier, as data on these assets will already be available and so can be easily shared with the FMAR digital infrastructure, allowing the assets to easily enter into all the local and national flexibility markets it is eligible for, reducing the market entry burden. This will also provide greater assurance for the market operators, the DNOs and NESO, as they will be ensuring the quality of data being submitted.

DNO and NESO network operations

2.71 A common approach to DNO asset registration can support network operations, with monitoring of the energy imported and exported by assets, both on an individual and aggregated level, facilitating network balancing as well as constraint and voltage management.

2.72 However, for most of these functions, dynamic data (i.e. real-time information about an asset's current state and availability) is required, which is out of scope of the new DNO licence requirements proposed in this consultation. Static data is an enabler and a prerequisite for effective use of dynamic data, so improving asset registration data storage and sharing remains critical as an enabler. Further

enabling of this use case has been proposed as a focus of DNO digitalisation efforts in the next price control period, ED3.[29]

Further use cases - expanding data sharing with the wider industry

2.73 A common approach to storing and sharing DNO asset registration data increases data quality and data accessibility, ensuring a wider range of stakeholders can benefit from it. Development of bespoke data sharing agreements can be time-consuming, costly and an administrative burden. A common approach enables data which is higher quality and easier to access for wider industry. This will reduce friction for groups who may find the current process cumbersome and the barrier to entry too high. The use cases below set out wider industry stakeholders and sector objectives which could also be supported by a common approach to DNO asset registration. These further use cases will require appropriate approaches to consumer consent and data sharing controls.

Local authorities - energy planning

2.74 Local authorities will benefit from a common approach to DNO asset registration. The increased data accessibility and quality will help inform local authorities in better monitoring and forecasting uptake of specific types of DERs and CERs in their jurisdiction. In particular, local authorities spanning multiple DNO regions will benefit significantly, as they will not have to spend extensive resource aligning data from different DNOs. This increased accessibility, quality and consistency can help them in building their Local Area Energy Plans and decarbonisation strategies.[30] It will also help them to collaborate with NESO when developing RESPs.

Installers - business planning

2.75 Installers can benefit from a common approach to DNO asset registration as it helps provide a general view of CER uptake and opportunities across regions. This can help installers shape their business strategies, for example considering specific areas where PV deployment is well suited or areas with limited CER deployment which might have more network capacity. Installers are often small businesses, and negotiating data-sharing agreements can be beyond their capacity. Taking a common approach to DNO data sharing would remove this barrier and improve accessibility.

Original Equipment Manufacturers - business planning

2.76 Similar to installers, Original Equipment Manufacturers (OEMs) can benefit by gaining a general view of how their assets are deployed across regions. This can

[29] Sector specific methodology consultation: electricity distribution price control (ED3) | Ofgem (sections 1, 4 and 5)
[30] Local Area Energy Plans (LAEP) | Energy Systems Catapult

help inform OEMs of where demand for their assets is growing and where it is not, in turn supporting their business strategies.

Driving innovation

2.77 Innovation is inherently characterised by novelty and uncertainty; as such, it is difficult to predict exactly what innovations will arise from this use case.

2.78 Taking a common approach to DNO asset registration will help innovators to develop new business models, and build on existing business models, offering new products and services for assets. Examples could include supporting emergency services planning based on locations of assets with possible fire risks, and supporting green financing of assets.[31]

2.79 Innovators are often small businesses, which presents a barrier to entry to access DNO asset data, as negotiating data-sharing agreements can be beyond their capacity. A common approach to DNO asset data sharing would remove this barrier and improve accessibility.

2.80 Innovators want to scale, so a common approach to DNO asset data storage will give innovators a comprehensive view of asset registration data across the whole system, helping them determine whether to focus on region-specific innovation offerings or to apply them system-wide.

Data-driven policymaking

2.81 Policymakers will benefit from a common approach to data storage and sharing, as it will provide them with an accurate, system-wide view of asset registration data. This facilitates evidence-based policy development and enhances transparency with stakeholders. It also supports effective monitoring of policy impact and progress towards targets over time. This could be applied to a range of policy making areas, as one example, the harmonised data could be used to identify areas of high and low uptake of specific asset types, providing data-driven evidence to design targeted schemes.

Further research opportunities

2.82 A common approach to storage and sharing of DNO asset registration data would also benefit academic institutions and research organisations, enabling them to access standardised data to support research projects. This could facilitate studies on technology adoption rates, regional disparities and whole-system impacts.

[31] UK Government Green Financing Framework 2025

Questions

Q1. Do you agree with our case for change and that policy intervention is needed for DNO asset registration?

Q2. Do you agree with our priority use cases, and are there any other use cases we should consider?

Q3. Are there any other policy or industry initiatives that we should seek to align with?

3. Defining the DNO asset registration scope and key considerations

Section summary

This section sets out the scope of this consultation, the enablers to support a successful delivery of a common approach to DNO asset registration and key dependencies in the broader asset visibility landscape.

3.1 In this section, we set out the scope of this consultation. We also aim to highlight the enablers and dependencies relating to this consultation, which are important for the delivery of improved DNO asset registration.

Scope

Assets in scope

3.2 We propose that the assets included in the scope of this consultation, and therefore any DNO asset registration solution, are small-scale DERs and CERs, broadly defined as those with a capacity of less than 1MW, with a priority focus on the registration of assets not currently covered by the ECR (e.g. assets with a capacity of less than 50kW), as we believe these are the assets on which data is the least available.

3.3 Examples of such assets include heat pumps, EV chargers, small solar PV installations, and domestic battery energy storage systems.

Data in scope

3.4 We propose the scope of the data in this consultation and for any DNO asset registration solution be limited to ‘static’ asset registration data that supports our primary use cases of DNO network planning and NESO whole system planning. Static data items include, for example, asset type, serial number, model, manufacturer, capacity, and meter point administration number. The process for determining which specific static data items should be included is discussed below.

3.5 Though this data is often referred to as ‘static’ data, we acknowledge that even static data items maybe be subject to change over time, as assets are repaired or replaced, or ownership changes.

3.6 Dynamic data, such as operational data and real-time monitoring, are out of scope for this consultation, as we believe this would significantly increase the cost and complexity of any solution and is also being considered as part of existing ED3 work, as set out in the previous chapter.

Entities in scope

3.7 The relevant entities in scope of this consultation are primarily DNOs, who would be subject to the new license conditions covering asset registration.

3.8 Elexon, in their role as Market Facilitator and the FMAR delivery body, is also in scope, as we propose working with Elexon to ensure that the FMAR digital infrastructure will at a minimum need to be interoperable with DNO asset register(s), and are considering if the FMAR digital infrastructure itself should be expanded to cover DNO asset registration, under option 4.

3.9 NESO are the interim coordinator of the DSI which we propose that DNO asset registration will become a use case of; therefore, we believe NESO will play an important role in facilitating data sharing between the relevant entities to support our primary use cases.[32] We also believe streamlining the sharing of DNO asset data will aid NESO in making data-driven decisions to support whole system planning, one of our primary use cases for this intervention.

3.10 Additionally, a range of stakeholders across wider industry, including installers, OEMs, innovators, local authorities, policy makers, and academics will benefit from streamlined sharing of DNO asset data. There will be stakeholder engagement as part of the development process for a common approach to DNO asset registration, and we welcome their contribution now to this consultation.

Data journey stages in scope

3.11 There are three stages of the data journey that need to be considered; (1) how the data is collected, (2) how and where the data is stored, (3) how that data is then shared.

3.12 This consultation looks at the (2) storage and (3) sharing stages. This includes who will be responsible for storing DNO asset registration data, and how this data can be shared with relevant entities, such as NESO.

3.13 This consultation does not consider (1) data collection, i.e. the flow of data from installer to DNO, as DESNZ is currently exploring policy options in this area. We outline the collection related interventions we would be supportive of below; and will work with DESNZ to ensure alignment between our data storage and sharing proposals and any reforms to data collection.

Enablers and dependencies

3.14 Successful implementation for any of the proposed DNO asset registration options hinges on specific enablers and dependencies essential to delivering a

[32] Governance of the Data Sharing Infrastructure | Ofgem

robust DNO asset registration solution that incorporates interoperability in its design and encourages effective data storage and sharing.

Data collection

3.15 We understand that the impact of the options we propose are limited if DNOs are not receiving installation data from installers, or that the information that is received is filled out in an inconsistent format or quality.

3.16 As described in chapter 2, under the current arrangements, installers can submit asset registration data to DNOs through different portals, such as Connect Direct or bespoke DNO portals. Installers can also submit asset registration data manually. These fragmented and inconsistent registration processes contribute to under-registration of small-scale assets.

3.17 In DESNZ's Call for Evidence, streamlining installer notifications is discussed as an option to reduce the administrative burden installers and improve the collection of asset registration data.

3.18 Our view is that streamlining installer notifications would have a positive impact on data collection and promotes interoperability, positively impacting all of the options discussed in chapter 4.

Data items and standards

3.19 A common approach to DNO asset registration will require an agreed set of common data items to be collected and stored, and a data standard to define how these data items will be defined, formatted and managed to ensure interoperability.

3.20 Data items will need to be sufficient to enable the identified use cases, to allow DNOs, NESO, and other relevant parties to make informed data-led decisions, while not being extensive enough to add unnecessary complexity to the design and implementation of any asset register(s).

3.21 If we intervene in this space, we propose publishing guidance, developed in collaboration with industry, setting out the data items that will be required for a common approach to DNO asset registration.

3.22 This guidance would be aligned with the asset data items that are identified by Elexon's stakeholder engagement through the FMAR programme, as well as those used by ENA Connect Direct, and innovation projects like LCT Connect.

3.23 The data standard adopted will need to be defined early in the development of any new technical solution, and will be required to be based on an international standard, be suitable for the range of use cases and scope we have set out, and be agreed with stakeholders.

Data sharing and the DSI

3.24 DNOs have an existing licence obligation to comply with Data Best Practice Guidance (DBP). This guidance requires that all energy system data is treated as 'Presumed Open', subject to Open Data Triage.[33] Some of the data held as part of DNO asset registration will be sensitive and require sharing with only trusted parties, but we consider that some of it will be sharable as open data. We expect DNOs to apply the triage process to any collected asset registration data , and then to clearly communicate what data will be made openly available and what will be available on a more restricted basis. For the data that cannot be made openly available, the Data Sharing Infrastructure (DSI) should be used to exchange information between trusted parties.

3.25 The DSI will enable data sharing between the DNOs and NESO, as well as the FMAR digital infrastructure. Other parties to which the sensitive asset registration data is relevant and useful should engage with the NESO (as Interim DSI coordinator) to understand how best to connect in the timescales put forward in this consultation.

FMAR

3.26 It is critical the data items and data standards of FMAR are aligned with the options for DNO asset registration. This will enable effective sharing of information from the proposed DNO asset visibility option to the FMAR digital infrastructure, and vice versa.

3.27 Additionally, a harmonisation process for data held by the FMAR digital infrastructure and DNO asset register(s) will be required to ensure a single source of truth (SSoT) for asset registration data, particular when data items are updated.

Access to other datasets

3.28 To build a more complete picture of distributed energy assets, we see value in DNOs being able to access other key datasets, such as the MCS Installation Database (MID) and Department for Transport data on EV chargers, particularly for legacy assets that were never registered with DNOs.

3.29 We believe that taking a common approach to DNO asset registration will make it easier to ensure DNO systems are interoperable with these external datasets, ensuring consistency and ease of data exchange, and allowing for the development of clearly defined data sharing agreements and governance arrangements to uphold regulatory compliance, data integrity, and privacy protections.

3.30 We welcome stakeholder views on how DNOs can overcome barriers to data storage, data sharing agreements, and integration of other datasets to fill in

[33] Data Best Practice Guidance / Data Best Practice as a Code Obligation | Ofgem

missing data, where they have identified this, including any legal, compliance, regulatory issues.

Questions

Q4. Do you agree with the scope proposed for assets, data, entities, and data stages, should anything else be considered?

Q5. Do you agree with our enablers and dependencies, and are there any others we should consider?

Q6. Do you have any suggestions for collecting legacy data, or for integration of other datasets into DNO registers?

4. Options for improving DNO asset registration

Section summary

This section sets out the potential options for improving the visibility of assets within the scope of this consultation.

4.1 In this section we set out four options for consideration and comment: option 1 a non-intervention option and options 2, 3 and 4 as intervention options. Each option presents a different approach to storing and sharing static asset registration data, with varying implications for governance, ownership, and deliverability.

4.2 We have sought to evaluate each option in terms of suitability for achieving our use cases considering the potential benefits, risks, and deliverability. There is a strong emphasis on interoperability, data quality, and alignment with related initiatives such as the FMAR digital infrastructure.

4.3 We aim to provide stakeholders with a basis for comparison between options, inviting feedback on feasibility, benefits and risks. The options are not fully developed however we have aimed to provide sufficient information to enable stakeholders to comment meaningfully.

Option 1 – No intervention

Option overview

4.4 Under this option, no new intervention from Ofgem is taken forward. A commercial option could emerge without specific policy intervention; for example from an innovation project, from existing commercial entities bringing forward new products and services, or from voluntary collaboration.

4.5 We expect that some aspects of DNO asset registration may be improved through digitalisation spending in ED3 under this option however would be at the discretion of each DNO.

Data storage and sharing

4.6 Under this option, DNOs continue to store data in bespoke and non-interoperable databases, with sharing mechanisms continuing to be fragmented.

Implementation

4.7 A successful outcome under option 1 is reliant on industry choosing to act, possibly through the enhancement of existing processes or the adoption of an innovation project or commercial product or service to deliver a solution.

Advantages and opportunities

4.8 A non-intervention approach would mean that there would be no delays from regulatory design, consultation processes or insertion of licence conditions or code modifications, enabling industry to continue with existing practices.

4.9 Another advantage is that, without a policy intervention, a market-based solution could emerge, driving competition and innovation.

Disadvantages and risks

4.10 It is our view that it is unlikely that DNOs have the governance frameworks in place or the incentives to deliver a collective solution under current arrangements. Therefore, we do not believe that a non-intervention approach is likely to deliver the desired policy outcomes.

4.11 We believe that without intervention, DNOs' static asset datasets will remain disparate, and lack interoperability with other digital infrastructure, such as FMAR, MID, and NESO systems, with data publishing covered only by the Data Best Practice guidance.

4.12 It is unclear if a solution will emergence in a timely manner, if at all. Although ENA Connect Direct has improved the registration rate of CERs and DERs, issues with inconsistent data collection remain and there has been little progress in taking a common approach to data storage and sharing across DNOs. Therefore, with no intervention, there is no indication that a suitable solution will emerge organically.

Option 2 – Multiple standardised DNO registers

Option overview

4.13 Under this option, Ofgem would introduce a new licence condition which would require that each DNO holds and maintains data on DER and CERs connected to their networks in their own asset registers.

4.14 We would also publish associated guidance which would detail the requirements of these registers, including requirements to store static asset registration data in a consistent format, using agreed common data items and data standards, required to enable interoperability between the DNOs internal systems and other relevant digital infrastructure, such as FMAR and MID.

4.15 The guidance, including standard data format, items, and standards, would be developed by Ofgem in collaboration with industry.

4.16 We would also work with Elexon to establish a requirement to notify the relevant DNO when new assets are registered through the FMAR digital infrastructure or changes to any data items were recorded.

Data storage and sharing

4.17 Under this option, each DNO would be individually responsible for the storage of asset data for their network, DNOs would be the sole data owners for this data.

4.18 For data sharing, we propose setting out interoperability requirements between each of the asset registers in the guidance document; enabling efficient data sharing, using the DSI, across relevant digital infrastructure, such as FMAR, and supporting the development of a single source of truth (SSoT) across the sector, with each DNO responsible for providing a SSoT for assets connected to their network.

4.19 DNOs would continue to be responsible for undertaking data triage to determine which data is made public, and which should be exchanged with relevant parties (including NESO) using the DSI.

4.20 The Ofgem guidance would ensure that it was designed to enable data sharing between the DNO registers and other relevant digital infrastructure, such as FMAR, and other relevant databases, such as MID, using common data items and data standards to ensure interoperability across the DSI. Under option 2 we envision that DNO asset registers are interoperable with other datasets, under and subject to data-sharing agreements, DNOs continue to fill gaps from sources such as MID and DfT.

Implementation

4.21 DNOs would need to invest in upgrading their internal systems and processes to validate and transform, where necessary, the data received in alignment with agreed data standards. This could include the expansion of DNOs existing ECRs to include all CER and DER assets under 1MW.

4.22 We would need to undertake further work to understand the exact scale of intervention and required investment from DNOs. Depending on the scale and timing of required investment for DNOs, this could be funded either through the ED2 digitalisation re-opener (subject to meeting the relevant requirements) or considered as part of the ED3 price control setting process.

4.23 As the FMAR digital infrastructure will also collect asset registration data and flexibility market data (primarily from FSPs) it could act as an additional source of asset information. We propose working with Elexon to establish a requirement to notify the relevant DNO when new assets are registered through the FMAR digital infrastructure or changes to any data items were recorded. This would support completeness and alignment across registers.

Advantages and opportunities

4.24 Timelines for delivery would likely be shorter in this option when compared to other options as this option involves DNOs upgrading current registers, using existing infrastructure, instead of the creation of a new asset register.

4.25 Under our current ED3 SSMC proposals, DNOs will need to invest in ED3 to improve the quality of their data and to harmonise their data items and data standards. By leveraging existing investment, this option builds on this requirement rather than creating a new centralised solution. This should be a relatively cost-effective approach to implementation, making it a practical and efficient solution.

4.26 We expect that DNOs will for practical purposes require a local copy of data on assets connected to their networks, for this option the 'local' copy would be the SSoT for that data, and would therefore be non-duplicative and introduce no new harmonisation requirements.

Disadvantages and risks

4.27 This approach may increase the complexity of coordination. As the responsibility sits with each of the DNOs (rather than with a central body), each DNO must implement and maintain its own asset register.

4.28 Whilst alignment of data items and standards to encourage interoperability between the FMAR digital infrastructure and the DNO asset registers are vital for consistency, it will inevitably create a degree of overlap in the data items being collected by the FMAR digital infrastructure and the DNO registers. Both FMAR and the DNO registers will likely record the same core data items, as there will be data items with cross-over in the use cases for FMAR and DNO asset registration. This creates an issue around duplication of effort, will involve a reconciliation process to ensure that the single source of the truth is maintained, and that assets are not double-counted across sources.

4.29 As the shared responsibility of ownership will sit with each of the six DNOs, there is a higher risk of inconsistent interpretation of standards. Whereas a central body can address potential misalignment between DNOs, there is an increased risk associated with this option of interoperability standards and data harmonisation not being met, impacting the ease of sharing with users such as NESO. Additionally, this creates an increased risk of some of the DNO asset registers not being interoperable with the FMAR digital infrastructure, limiting the benefits of this as another source of asset registration data.

Option 3 – Creation of a new central DNO asset register

Option overview

4.30 Under this option, Ofgem would introduce a new licence condition requiring DNOs to create and utilise a single, combined asset register for all DERs and CERs. The development and management of the new asset register is undertaken by a suitable entity which we would assign responsibility to.

4.31 We would also publish associated guidance which would detail the requirements of these registers, providing instruction to both the delivery entity for the register and DNOs, including requirements to store static asset registration data in a consistent format, using agreed common data items and data standards, required to enable interoperability between the DNOs internal systems, the central DNO asset register and other relevant digital infrastructure, such as FMAR and MID.

4.32 Initial guidance, including standard data format, items, and standards, would be developed by Ofgem in collaboration with industry. However, there could be a role for the central entity to provide additional guidance, either developing further details or wider guidance on integration with the central register.

4.33 We would also work with Elexon to establish a requirement to notify the central DNO asset register when new assets are registered through the FMAR digital infrastructure or changes to any data items were recorded.

Potential candidates to create and manage the asset register

4.34 We have considered various options for this entity which we set out below. This could involve 1) creating a new entity or 2) expanding the remit of an existing entity.

4.35 A new entity could be established with a remit of creating and owning a central asset register. This could potentially deliver the outcomes very effectively, at it is only focused on one activity. However, the setup time, cost and resource needs are likely to be high. As such, we don't believe this option is preferable to expanding the remit of one of the existing entities set out below.

4.36 If an existing entity is instead assigned this responsibly, we believe there are three main contenders: NESO, the ENA and Electralink. Elexon is not considered under option 3, as we instead we consider it under option 4 in its Market Facilitator role.

4.37 NESO - as a central entity with responsibility for many cross-sector activities, this could align well with NESO's existing roles. NESO already maintains a variety of registers, including the Transmission Energy Capacity register and the Embedded Register, and this could also align with its SSEP and RESP roles as well as TIDE activity. NESO is also the Interim DSI coordinator, so alignment of a central asset register with the DSI would be easier. NESO is a regulated entity so it can be held to account and there is a clear implementation route.

4.38 However, NESO is already scaling up to take on a large number of new roles and activities, adding another creates a possible overload risk which might result in under delivery. NESO has strong expertise at transmission level, and although their expertise at distribution and CER/DER level is increasing, there is a risk of a NESO-led solution being less focused on DNO needs and use cases at the distribution level.

4.39 The ENA - as a membership body that is funded and governed by DNOs, it is very likely to deliver on their needs. It also has existing expertise in asset registration, given their work delivering Connect Direct. That said, Connect Direct is focused on data collection, not data storage or sharing. In addition, as an unregulated entity the legal implementation route is unclear and the ENA would be very difficult to hold to account directly.

4.40 Electralink - as it was created and is funded by DNOs it is likely to deliver on their needs. Electralink has existing data sharing related functions and expertise, which could be extended. There in an existing precedent of Standard License Condition 37 of the Electricity Distribution Licence, which puts obligations on DNOs to establish and utilise the Data Transfer Service, for a legal implementation route. However, Electralink's existing scope and expertise is more focused on metering data - not asset data - and it's unclear if these existing functions are suitable for expansion. Similar to the ENA, Electralink is not a directly regulated entity, so it is likely to be hard to hold to account.

4.41 Other entities with a formal enduring role, DCC, Gemserv and RECCO, were considered and discounted, as their remit focuses on retail and metering aspects, not small-scale assets and the distribution network, and they have more limited experience in data storage and sharing.

Data storage and sharing

4.42 Under this model, DNOs collect asset registration data and feed it into a centralised register, which would act as the single source of truth for all assets within scope of this consultation, with Ofgem-created guidance detailing agreed upon data items and standards.

4.43 The Ofgem guidance to the entity assigned to develop and own the register would ensure that it was designed to enable data sharing between the central register and other relevant digital infrastructure, such as FMAR, and other relevant databases, such as MID, using common data items and data standards to ensure interoperability across the DSI.

4.44 In this option the DNOs and the responsible entity would have joint data ownership, the exact details of this would need to be determined during the implementation of this option, but for example DNOs may be responsible for data accuracy and access control, while the responsibility entity could be responsible for data security, standardisation, and management.

4.45 Authorised parties, such as NESO, would be able to access the central DNO asset register via the DSI. The centralised DNO asset register would then provide them with system-wide data. The DNOs would also be able to access the central DNO asset register via the DSI and would be able to filter by relevant Distribution Services Area, to view the static asset registration data which they are responsible for.

Implementation

4.46 Under this option DNOs would need to transform the data received in alignment with agreed data standards, as set out in the guidance, before feeding such data to the central DNO asset register.

4.47 The FMAR digital infrastructure will also collect asset registration data and flexibility market data, primarily from FSPs, and would therefore act as an additional source of asset information. As such, as part of this option, we propose working with Elexon to establish a requirement for the FMAR digital infrastructure to share relevant asset registration data to the central DNO asset register, when new assets are registered with the FMAR digital infrastructure or changes to any data items were recorded. This would support completeness, ensuring DNOs are aware of new notifications through FMAR and alignment across FMAR and the central DNO asset register. In this option, it is vital that data items and data standards are aligned between the DNO asset register and the FMAR digital infrastructure.

4.48 The entity responsible for the ownership and management of the central DNO asset register should have the ability to validate and confirm changes before these are accepted as authoritative, ensuring that the central DNO asset register remains the SSoT for asset data.

4.49 We expect option 3 would require significant investment from DNOs to deliver. Depending on timelines, funding could therefore require using the digitalisation re-opener in ED2, with enduring funding arrangements considered as part of the ED3 price control setting process.

Advantages and opportunities

4.50 Under option 3, all static asset registration data is consolidated in the DNO asset register, providing a centralised SSOT and making interoperability easier to achieve.

4.51 Governance is simpler to manage in this option, as one entity oversees the quality assurance, security and data standards, instead of six separate entities, as under option 2.

4.52 A central DNO asset register provides a single interface with the FMAR digital infrastructure, MID and other systems, as well as users such as NESO, without needing multiple bilateral interfaces to each of the relevant digital infrastructure.

4.53 A central DNO asset register also supports future scalability. As it is a single platform, it should be easier to adapt to new requirements, as and when these emerge.

4.54 A centralised solution also results in better data quality control, compared to having 6 separate registers, as validation processes and data audits are easier to implement.

Disadvantages and risks

4.55 As indicated previously we expect that DNOs will for practical purposes require a local copy of data on assets connected to their networks. For this option the 'local' copy would be in addition to the SSoT held by the central DNO asset register, which introduces a requirement on DNOs to ensure harmonisation between the central asset registers and their own copies, particularly when asset data is added or updated.

4.56 This option involves building and implementing a centralised solution from the ground up, this is resource intensive and complex to implement. As a result, this option is likely to take longer to implement than other options.

4.57 We also expect a high upfront cost to design and build the solution and then to migrate data from existing systems. Similar to option 2, DNOs would still need to invest in adapting their internal processes to ensure interoperability.

4.58 Under this option alignment of data items and standards to encourage interoperability between the FMAR digital infrastructure and central DNO asset register is vital for consistency. However, there would inevitably be a degree of overlap in the data items being collected by the FMAR digital infrastructure and the central DNO asset register. Both will likely record the same core data items, as there will be data items with cross-over in the use cases for the FMAR digital infrastructure and DNO asset registration. This creates an issue around duplication of effort and will involve a reconciliation process to ensure that the single source of the truth is maintained.

4.59 Finally, as a centralised solution, this option introduces the risk of a single point of failure. If the central DNO asset register fails, all parties will lose access to the data.

Option 4 – Expansion of an existing or emerging industry platform

Option overview

4.60 Under this option, we would introduce a new licence condition to require DNOs to share asset registration data with an existing asset register. There are different

potential options, however our current view is that the FMAR digital infrastructure is the most suitable register for this purpose.

4.61 If using the FMAR digital infrastructure, responsibility for maintaining the central DNO asset register would be assigned to Elexon as part of their Market Facilitator role, through the Market Facilitator governance framework.

4.62 Guidance, developed by Elexon as Market Facilitator in collaboration with industry, would establish common data items and standards across DNOs.

4.63 For the rest of this section we assume that the FMAR digital infrastructure and Market Facilitator are the register and entity chosen to deliver a central DNO asset register, however we welcome stakeholder feedback as to whether there are other viable asset registers or entities that have the scalability to incorporate a centralised DNO asset register and are suitable for delivery. We considered and discounted various options for this register and entity, which we set out below.

Discounted options

4.64 The MID, operated by MCS, could be an option, with advantages and disadvantages as follows. The MID is a well-established small-scale asset database with high quality data. The MCS Foundation as a neutral entity could balance DNO and NESO needs. However, the MID's scope does not cover all assets which DNOs and NESO need visibility of, as it only covers MSC certified installations and doesn't cover EV infrastructure. The MID was set up to focus on MCS certification, so it might not focus effectively on DNO and NESO needs and use cases. In addition, as the MCS Foundation is not a regulated entity, the legal implementation route is unclear and it is harder to hold to account. Overall, we are proposing to discount this option as the existing governance and scope would be challenging to change.

4.65 The Transmission Energy Capacity register and the Embedded Register, operated by NESO could be an option. We have set out in option 3 under the NESO entity option why we have discounted NESO as the entity responsible for delivering a common approach to DNO asset registration, which applies equally to the expansion of NESO-operated asset registers.

4.66 The ECRs, operated by DNOs, could be an option. This would be a potential implementation route for the creation of multiple standard DNO registers, which is covered in option 2.

4.67 We have also considered and discounted the data on EV charging infrastructure, held by DfT, on the basis of scope. The scope is only EV changing infrastructure, it would be a very substantial change if this was expanded to cover all assets needed by DNOs and NESO, and DfT would no longer be an appropriate owner.

4.68 We have also considered and discounted Independent Market Platforms (IMPs), for a number of reasons. IMPs are neither licensed nor required to be party to the

industry codes, so there are limited legal mechanisms for implementation routes and holding them to account. Whilst they do hold asset data already, the scope is assets in flexibility markets, so their scope is not aligned with static asset registration at point of installation.

Data storage and sharing

4.69 Under this option DNOs would collect asset data upon the installation of an asset, with this data shared with, and stored in, the FMAR digital infrastructure, with Elexon and the DNOs sharing the responsibility of data ownership, the exact details of this would need to be determined during the implementation of this option, but for example DNOs may be responsible for data accuracy and access control, while Elexon could be responsible for data security, standardisation, and management.

4.70 The FMAR digital infrastructure is being developed as a use case of the DSI, so access to the data on DNO asset registration would be possible via the DSI.

Implementation

4.71 The FMAR digital infrastructure is expected to assign unique asset IDs to assets registered through its system. Under this option, this process can be expanded to include when DNOs share their static asset registration with FMAR.

4.72 This expansion means handling much larger volumes of data and engaging a broader set of stakeholders, as a larger volume of assets and data collection at point of installation will mean more actors involved in sharing the data with the FMAR digital infrastructure. These stakeholders would not otherwise be part of FMAR's remit.

4.73 Additionally, the point of asset registration data collection at installation and via DNOs falls outside FMAR's current scope, which focuses on assets participating in flexibility markets, this would require a significant change to how the FMAR digital infrastructure collects data. These factors make this option a significant step up in complexity and delivery requirements for FMAR.

4.74 We propose two sub-options, 4a an early integration as part of FMAR go-live or 4b a phased integration post FMAR go-live. These sub-options consider the various trade-offs and aim to provide clarity on timing, complexity, and stakeholder impact. We welcome views on these two sub-options.

4.75 For the two sub-options, we envisage that the costs borne by Elexon (for expanding FMAR) would be recovered through existing FMAR cost-recovery routes, although welcome views on whether this is appropriate or alternative approaches might exist. Depending on the scale and timing of required investment for DNOs, this could be funded either through the ED2 digitalisation re-opener (subject to meeting the relevant requirements) or considered as part of the ED3 price control setting process.

Option 4a – FMAR digital infrastructure integrates the DNO asset register as part of go-live

4.76 Under this approach, Elexon would launch the FMAR digital infrastructure with DNO asset registration functionality integrated from day one, creating a single register for all assets within scope of this consultation. This would deliver the benefits of a unified system immediately, avoiding duplication and ensuring interoperability from the outset.

4.77 However, feedback from Elexon indicates that incorporating DNO asset registration into FMAR's initial scope would significantly delay its go-live date. This is because the incorporation of DNO asset registration into FMAR greatly expands its scope and would need to accommodate data collection at installation and manage much larger data volumes than originally planned. It would also require engagement with a broader set of stakeholders and additional governance arrangements, increasing complexity and resource requirements.

4.78 We would like to understand from stakeholders whether the benefits of immediate integration of asset registration into FMAR outweighs the risks of a significant delay to the FMAR go-live date.

4.79 If there is strong support for this option, we will work with Elexon to determine how long a delay is likely to be, our current estimate is that it would push the go-live date for the FMAR digital infrastructure to at least 2030, and potentially beyond.

Option 4b – FMAR digital infrastructure is future-proofed for post go-live integration of the DNO asset register

4.80 Under option 4b, Elexon delivers the FMAR digital infrastructure as it is currently scoped, while its design incorporates scalability to enable DNO asset registration to be added later as a post go-live enhancement. This avoids delaying FMAR's initial delivery while still providing a clear roadmap for DNO asset registration integration.

4.81 FMAR is currently expected to go live in Q3 2027. Under this sub-option, DNO asset registration would be integrated after go-live, and the go-live date for FMAR would not be impacted.

4.82 While this phased approach reduces delivery risk of FMAR, it would create a further delay to the go-live date for DNO asset registration integration with FMAR. If there is strong support for this option, we will work with Elexon to determine how long a delay is likely to be, our current estimate is that it would push the go-live date for DNO asset registration integration with FMAR to well beyond 2030, later than option 4a. This represents a significant timeframe before the full benefits of a common approach to DNO asset registration are realised.

4.83 To compensate for this, we propose to publish guidance supporting the alignment of data standards and items within existing DNO asset registration systems, to

ensure they are better aligned with FMAR ahead of work beginning on FMAR expansion. This guidance would also support DNOs in using existing datasets, such as MID, to fill-in gaps in their data. Further guidance would then be issued by Elexon as market facilitator to support the full integration with the FMAR digital infrastructure.

Advantages

4.84 Under either of these sub options, the FMAR digital infrastructure will hold the single source of truth for both static asset registration data and flexibility market data. This creates a unified platform that eliminates duplication and fragmentation.

4.85 Via the DSI, DNOs and NESO will be able to easily access the data within FMAR, providing a single interface, supporting our primary use cases of DNO network planning and NESO whole system planning .

4.86 As the FMAR digital infrastructure can be leveraged to incorporate DNO asset registration, rather than building a new register from the ground up, this option could be both efficient and cost-effective.

4.87 FMAR is being delivered by Elexon under Ofgem oversight, with established governance processes and stakeholder engagement mechanisms. This provides a strong governance framework to ensure accountability for the increased functionality.

4.88 Elexon is already engaging with stakeholders on the design of FMAR, including data items and standards. If the FMAR digital infrastructure incorporates DNO asset registration, this creates an opportunity to embed DNO asset registration requirements as part of the stakeholder engagement process, ensuring alignment with industry needs and avoiding future retrofitting.

Disadvantages and risks

4.89 For both sub-options we also expect that DNOs will require a local copy of data on assets connected to their networks. This introduces a requirement on DNOs to ensure harmonisation between the FMAR digital infrastructure and their own copies, particular when asset data is added or updated. Thus DNOs would still need to invest in upgrading their internal processes and systems to ensure interoperability.

4.90 Due to FMAR not being live currently, DNOs and NESO will be limited in their ability to drive improvements today. Interim work to increase asset registration at the DNO level will need to be carefully considered and aligned with FMAR to avoid nugatory work.

4.91 The focus of the FMAR digital infrastructure is flexibility markets. By introducing DNO asset registration at this stage, there is a risk that DNO requirements may

become a secondary objective and the FMAR governance model will prioritise flexibility markets over the use cases associated with DNO asset register. As such, Elexon will have to carefully balance their role as Market Facilitator delivering FMAR with the use cases of DNO network planning and NESO whole system planning for DNO asset registration.

4.92 It is unclear at this stage the degree to which the FMAR digital infrastructure will have a centralised or decentralised architecture. This presents a risk through architectural uncertainty and the impact that will have on how DNO asset registration is delivered. If Elexon adopts a centralised solution, this introduces the risk of a single point of failure and if the FMAR digital infrastructure fails, all parties will lose access to the data. If Elexon adopts a decentralised solution, this increases the complexity of integrating the DNO asset registration functionality with the existing FMAR functionality.

4.93 For both sub options, as FMAR is not currently live, a risk of delay to FMAR in general will have a direct impact on delays to the go-live date of DNO asset register. Under option 4a, due to the large increase in scope, the FMAR go-live date would need to be pushed-back. This would delay the benefits of both the FMAR and a DNO asset register. Under option 4b, whilst there is less risk of delaying the FMAR go-live, the go-live date of DNO asset registration is pushed-back further so benefits will not be realised as soon.

4.94 There is a general delivery risk in that either sub-option presents a significant increase in scope for FMAR. If Elexon are not able to allocate the resources to accommodate this, or adjust their delivery strategy, this would introduce a significant delivery risk.

Questions

Q7. Do you agree with the advantages and disadvantages for the proposed options, are there others or any wider aspects we should consider?

Q8. Are there any changes you would make to any of the proposed options to enhance them?

Q9. Have we missed or discounted any options that you think are suitable? In particular, for option 4 is there a preferable alternative to FMAR for expansion, and why?

Q10. Which option is your preferred option, and why?

5. Conclusions and next steps

Section summary

This section contains a summary of our four options presented for stakeholder feedback. It also sets out next steps, including a review of responses to inform our ongoing policy development on DNO asset registration, whether an intervention is necessary, and which of the options should be pursued.

5.1 We have set out our proposals for improving DNO asset registration, including establishing our case for change.

5.2 We have presented four options for stakeholder feedback:

- Option 1 - No intervention: Rely on voluntary or market-led improvements, with the risk that data remains fragmented and progress is slow.
- Option 2 - Multiple standardised DNO registers: Each DNO maintains its own register but follows common data standards and interoperability requirements.
- Option 3 - Creation of a new central DNO asset register: A single, centrally managed register consolidates all asset registration data, simplifying governance and integration.
- Option 4 - Expansion of an existing or emerging industry platform: Leveraging existing digital infrastructure to provide DNO asset registration. For example, expanding the Flexibility Market Asset Registration (FMAR) platform to include DNO asset registration.

5.3 Having set out these initial options and proposals in this consultation, we welcome your feedback. We will review your consultation responses and use this to inform our ongoing policy development on DNO asset registration.

5.4 We are gathering your feedback to inform our decisions around a potential new licence condition to place an obligation on DNOs to take a common approach to asset registration. In particular, your feedback will help inform our decision on if an intervention is necessary, and if so which of the options we should pursue to deliver this.

5.5 Following this consultation we will look to make a decision on any interventions necessary, this may or may not require further consultation, any proposed licence changes will be subject to due consultation process.

5.6 We will work closely with the Department for Energy Security and Net Zero to ensure our on-going policy development is aligned with government policy on asset visibility; as well as with Ofgem colleagues delivering the End-to-End Connections review and the ED3 price control proposals on digitalisation; and

with both Elexon and Ofgem colleagues who are delivering Flexibility Market Asset Registration.

Send us your feedback

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this consultation. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Do you have any further comments?

Please send your feedback to stakeholders@ofgem.gov.uk.

Appendix 1. Consultation questions

Section 2

Q1.	Do you agree with our case for change and that policy intervention is needed for DNO asset registration?
Q2.	Do you agree with our priority use cases, and are there any other use cases we should consider?
Q3.	Are there any other policy or industry initiatives that we should seek to align with?

Section 3

Q4.	Do you agree with the scope proposed for assets, data, entities, and data stages, should anything else be considered?
Q5.	Do you agree with our enablers and dependencies, and are there any others we should consider?
Q6.	Do you have any suggestions for collecting legacy data, or for integration of other datasets into DNO registers?

Section 4

Q7.	Do you agree with the advantages and disadvantages for the proposed options, are there others or any wider aspects we should consider?
Q8.	Are there any changes you would make to any of the proposed options to enhance them?
Q9.	Have we missed or discounted any options that you think are suitable? In particular, for option 4 is there a preferable alternative to FMAR for expansion, and why?
Q10.	Which option is your preferred option, and why?

Appendix 2. Glossary

Term	Definition
CER	Consumer Energy Resource, energy technologies that are owned or used by consumers to generate, store, manage, or consume energy. For example, electric vehicles, heat pumps, battery energy storage systems, and solar PV.
DBP	Data Best Practice, principles and expectations for licensees to follow when preparing Digitalisation Strategies and Action Plans. Part of Ofgem's standards for data and digitalisation.
DER	Distributed Energy Resource, small-scale energy generation and storage systems which are connected to the distribution networks.
DESNZ	The Department for Energy Security and Net Zero which covers the Government's energy portfolio.
DNO	Distribution Network Operator, licensed companies that own and operate the network of cables, transformers and towers that bring electricity from the national transmission network to businesses and homes.
DSI	Data Sharing Infrastructure. An Ofgem policy for a mechanism to securely share standard data between energy sector organisations. This develops and delivers the Energy Digitalisation Taskforce recommendations for a Digital Spine.
ENA	Energy Networks Association the trade body representing energy networks in the UK and Ireland.
FMAR	Flexibility Market Asset Registration, an Ofgem programme, delivered by Elexon, seeking to create a common system for registering energy assets into flexibility markets, ensuring that information about assets can flow to both market operators and participants. It will allow assets to be registered once for access to multiple markets.
FSP	Flexibility Service Provider is an umbrella term for the party who takes delivery and other contractual risks when providing flexibility services. This may be the asset owners, asset operators, aggregators, Virtual Lead Parties, and Demand Side Response Service Providers.
MCS	Microgeneration Certification Scheme, a UK quality assurance scheme that assesses the quality, performance, and safety of small-scale energy products such as solar panels, heat pumps, and wind turbines.

Term	Definition
MID	MCS Installations Database, a central online database that holds records of every MCS certified small-scale, low carbon installation in the UK since 2010.
NESO	National Energy System Operator (formerly known as Electricity System Operator, ESO) is an independent public body responsible for the strategic planning of Great Britain's electricity and gas networks and operating the electricity system. Designated as the Independent System Operator and Planner under the Energy Act 2023, its purpose is to help facilitate the country's transition to net zero, while ensuring the energy system remains reliable, efficient, and secure.
SSoT	Single Source of Truth, authoritative data repository or register that is considered the definitive source for given data elements, ensuring consistency and accuracy across all systems
TIDE	Transformation to Integrate Distributed Energy, a NESO programme focused on improving real time operations, market facilitation, and strategic planning for DERs and CERs.

Appendix 3. Related publications

- Improving the visibility of distributed energy assets: call for evidence | GOV.UK
- Clean Power 2030 Action Plan | GOV.UK
- Clean flexibility roadmap | GOV.UK
- Decision: flexibility market asset registration | Ofgem
- Sector specific methodology consultation: electricity distribution price control (ED3) | Ofgem
- Embedded Capacity Register | DCUSA
- Revision to Embedded Capacity Register (ECR) to lower threshold for entries from 1MW to 50kW - DCUSA
- ENA Connect Direct | Energy Networks Association
- Transformation to Integrate Distributed Energy | National Energy System Operator
- Governance of the Data Sharing Infrastructure | Ofgem
- Consumer Consent decision | Ofgem
- Data Best Practice guidance | Ofgem
- Data Best Practice as a Code Obligation | Ofgem
- Consumer Consent Service | Retail Energy Code Company
- Connections end-to-end review: updated proposals and next steps | Ofgem

Appendix 4. Privacy policy

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, "Ofgem"). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

Information: Include here all organisations outside Ofgem who will be given all or some of the data. There is no need to include organisations that will only receive anonymised data. If different organisations see different set of data then make this clear. Be a specific as possible.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for (be as clear as possible but allow room for changes to programmes or policy. It is acceptable to give a relative time e.g. 'six months after the project is closed')

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it

- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at https://ico.org.uk/, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas (Note that this cannot be claimed if using Survey Monkey for the consultation as their servers are in the US. In that case use "the Data you provide directly will be stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in term of data protection will not be compromised by this".

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system. (If using a third party system such as Survey Monkey to gather the data, you will need to state clearly at which point the data will be moved from there to our internal systems.)

10. More information For more information on how Ofgem processes your data, click on the link to our "ofgem privacy promise".