



Network Price Controls Team
Ofgem
10 South Colonnade
Canary Wharf
London, E14 4PU

Subject: EA Technology Response to the ED-3 Sector Specific Methodology Consultation

Dear RIIO-3 Team,

We are pleased to submit our response to the ED-3 Sector Specific Methodology Consultation, contributing to the ongoing discussion on the future of electricity distribution networks in the UK. As a proudly UK-based company headquartered in the North of England, EA Technology has supported the UK energy sector for over 59 years, delivering innovation and technical excellence that has driven the evolution of smarter, more efficient, and sustainable electricity networks.

Our location in the North positions us uniquely to support the levelling-up agenda, ensuring that this transformative period in the UK's energy transition delivers growth and opportunities for regions that have historically faced underinvestment. EA Technology is proud of its track record in creating high-value jobs and fostering innovation that not only strengthens the electricity network but also contributes to regional and national economic growth.

EA Technology has a long history of collaborating with Distribution Network Operators (DNOs) to deliver cutting-edge solutions and expertise. From pioneering asset monitoring innovations to developing world-leading technologies that predict and prevent faults before they impact supply, our mission is to enable electricity networks to deliver the best possible outcomes for consumers at the lowest cost.

As the industry faces immense growth opportunities presented by net zero targets, the shift toward electrification, and the need for sustainable energy systems, we are committed to supporting the sector through this critical transformation.

In light of discussions around UK economic growth initiatives, such as those highlighted by government in the recent calls to regulators to drive UK growth, we recognise the vital role that innovative UK businesses can play in driving sustainable UK growth. EA Technology is well-positioned to support this agenda through:

- **Scaling LV monitoring production capacity:** Our manufacturing processes can be expanded rapidly to meet the growing needs of network operators, ensuring the deployment of critical infrastructure is timely, cost competitive and effective.
- **Reducing costs and improving efficiency:** Leveraging predictive monitoring solutions, we enable proactive network management, reducing operational costs and improving reliability for consumers.
- **Creating high-value jobs:** As a UK-based innovator, our expansion directly contributes to job creation and supply chain growth in the UK, aligning with the levelling-up agenda.
- **Collaborating with DNOs:** Our strong partnerships with DNOs allow us to understand and address operational challenges effectively, ensuring our solutions align with their strategic objectives.

These capabilities directly support Ofgem's vision for a resilient, sustainable, and future-ready electricity distribution system while also advancing national priorities for economic reform and regional equality.

In our consultation response, we address 30 of the questions posed, providing insights and recommendations that reflect our experience and expertise in this sector.

Thank you for the opportunity to contribute to this important consultation. We look forward to continuing our collaboration with the sector to deliver smart, cost-effective, and consumer-focused solutions for the UK's electricity networks.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Ian Cameron', with a large, stylized initial 'I' and a long, wavy horizontal stroke extending to the right.

Ian Cameron

Chief Operations Officer EA Technology

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Connections

Q18. Do you agree that the connection types of 'minor' and 'major' should be redefined? If so, do you have thoughts on how they should be redefined, via voltage works required, customer type, a blend of the two, or a split not considered here?

EA Technology Response:

Yes, we believe redefining the current connections categories will improve transparency and accountability of DNOs. Ultimately this will deliver better service for customers as they transition to net zero.

We think it would be more effective to categorise the connections **based on type (e.g. voltage) of connections as opposed to the type of customer**. This can be implemented easily and avoids potential confusion when a single customer may apply for different types of connection.

We would suggest that a **granular set of annual public reporting** is included within the requirements for the incentive. Providing more detailed data will highlight whether there are any unintended consequences of the new incentives, and where customers may not be receiving the service level they require. It enables simplicity and clarity in the incentive, while providing a greater depth of transparency for customers.

We would like to note that edge cases should be considered and clearly defined. For example if the “voltage at point of connection” is the boundary between minor and major connections categories, **DNOs who perform well will communicate this clearly with their customers**. Ensuring there is no confusion at any point in the process.

Q20. Do you agree with our proposal for LCT connections and their associated enabling works to be brought into the connections scope and incentivised, with the potential to set varying working day targets for different connection activities?

EA Technology Response:

Yes, we support the move from BMCSS to MCSS and support that symmetrical incentives for these LV LCT connections/ upgrades should have varying day targets- for example self serve connections for some LCT connection types are now able to achieve ATTQ of minutes.

Q22. Do you think any LCT connection incentive should be for domestic, non-domestic, or both? Why?

EA Technology Response:

A whole-system incentive must cover **domestic and non-domestic** LCT connections to avoid distorting deployment and to maximise consumer value. Domestic uptake (EV home charging, heat pumps, domestic PV/storage) drives load growth on LV feeders and service cut-outs; non-domestic demand (public/high-power charging hubs, fleets/depots, commercial PV/storage and heat) determines the pace of visible infrastructure and modal shift. Incentivising both segments will:

- **Accelerate pace:** Digital pre-assessment, standardised designs and “fast-track” pathways now make it possible to issue a **standard 1 MVA on-street high-power EV chargepoint connection offer in under 30 minutes** where pre-conditions are met. Incentives will drive DNO adoption of these tools and processes, cutting quote/connection times materially while maintaining safety and power-quality thresholds.
- **Deliver fairness and avoid distortions:** Focusing only on one segment (e.g., public charging) would slow household electrification and risk cross-subsidies; conversely, a domestic-only incentive would underdeliver visible public charging and fleet decarbonisation.
- **Unlock least-cost solutions:** With both segments in scope, DNOs are rewarded for proactive LV visibility, flexible/queued offers, and targeted reinforcement where it is genuinely lower-cost than curtailment—lowering whole-system costs for all users.
- **Support innovation and competition:** Clear, segment-specific targets (below) create room for new connection products (e.g., time-bound curtailment, dynamic capacity, modular “HPC pods”) and for third-party delivery where appropriate.

Q25. Do you agree with the proposals we have set out for changing the incentives for the RMS for the MCCSS for the purposes of encouraging faster and more transparent connections and improving the quality of offers and post-offer services provided by DNOs? If not, what other proposals do you suggest?

EA Technology Response:

We support the need to drive a better customer experience as opposed to the current

approach. Technology now exists where say a Charge point Operator is able to optioneer in DNO digital tools to find the best suited connection ahead of selecting one to progress with. This reduces effort both ends based upon one digital version of the network.

A great example of this is the UK Power Networks' HV Autoquote, developed with support from network innovation funding, which reduces complexity for both the customer and the DNO. The financial incentives should drive DNOs to continue to innovate and implement more of these solutions and so improve their services to their customers.

Broad Measure of Customer Service

Q30. Do you agree with removing the 'Connections Survey' and the LCT related elements from the 'General Enquiries Survey' from the CSS part of the BMCS and putting this into the new smaller connections incentive? Why?

EA Technology Response:

Yes, as this will provide a clearer alignment between all types of LCT connections under one incentive. Consideration should be given to the volume of automated approvals and quotations provided at all levels, this will drive down the Time to Quote exponentially and manage the cost to serve each.

Digitalisation and Data

Q51. Do you agree with our proposed approach on all five themes? Why?

EA Technology Response:

Our overarching stance is that we agree, the five themes form a coherent direction that will strengthen the digital foundations of ED3. The approach should, however, balance ambition with practicality by focusing on adoption and integration, not just capability creation. We also believe that DNOs should build internal digital literacy and ownership, but avoid duplicating proven market tools or fragmenting approaches through in-house software development.

The reason for this is that the five themes are interdependent; progress in data sharing, interoperability and asset visibility will be constrained without skilled internal teams to manage them. Stronger internal capability ensures informed procurement and governance, without necessarily requiring in-house software creation. In addition, economies of scale and vendor maturity mean that collaboration and market adoption can

deliver faster, cheaper and more interoperable outcomes than bespoke internal builds. Overall, the sector will benefit most from common frameworks, shared data standards and coordinated learning rather than separate digital strategies for each DNO.

Recommendations

We recommend clarifying that building capability means developing strategic and analytical skills, not full software development capacity. We also suggest continuing to encourage DNOs to demonstrate a market scan before pursuing bespoke digital builds in-house. Cross-DNO collaboration and code-sharing should be encouraged not just for innovation but also for business-as-usual strategies, ensuring that learning from innovation is implemented consistently and avoids divergence.

Finally, for DSAPs, we recommend establishing a standardised framework for calculating and reporting digital benefits, ensuring that figures are derived using consistent methodologies across all DNOs so that future DSAPs present comparable, like-for-like (“apples to apples”) benefit calculations.

Q52. Do you agree with the need and role of the independent expert panel on interoperability? Why?

EA Technology Response:

We agree that an independent interoperability panel is both necessary and appropriate. It represents a proportionate and balanced mechanism to provide technical assurance and help the sector align around consistent expectations. Interoperability continues to be one of the most significant barriers to whole-system coordination and efficient data sharing, and an independent panel can play a critical role in addressing this. By acting as a neutral body, the panel can help ensure that standards are applied consistently and proportionately across the sector, reducing duplication while improving data quality and accessibility. It is also important that this panel reflects practical, real-world experience; insight from integrators, software vendors and SMEs will be crucial in ensuring that interoperability standards can be successfully implemented in live product environments.

We recommend that the panel’s remit focuses on guidance and coordination, supporting convergence rather than enforcing compliance. A use-case-led approach would add strong value, creating opportunities for DNOs and their partners to showcase examples of where interoperability has been delivered well. Finally, we believe that the panel should include balanced representation from network operators, innovators, SMEs and independent experts to ensure that the work is informed by a broad range of technical and operational perspectives.

Q53. Do you agree that DSAPs should include outcome-linked digital spend? Why?

EA Technology Response:

We agree that linking DSAP digital spend to measurable outcomes is essential for ensuring transparency and delivering consumer value. For example, investing in self-serve connections provides a clear and demonstrable efficiency benefit as well as direct customer value, which illustrates why outcome linkage matters.

Ensuring that digital investments are tied to outcomes helps guarantee that they lead to tangible system improvements rather than activity for its own sake. Public, comparable reporting of digital benefits builds confidence across the sector and encourages the replication of approaches that have proved successful. Clear attribution of outcomes will also motivate both DNOs and their supply chains to optimise the value and performance of digital investments.

To support this, we recommend standardising the frameworks used to calculate benefits, ensuring that comparisons between DNOs and vendors are genuinely like-for-like, in other words, that “apples are compared with apples.”

Innovation

Q54. Do you agree that we should maintain the current NIA Eligibility Criteria? Why?

EA Technology Response:

We support maintaining the existing NIA Eligibility Criteria, with some targeted clarifications. The NIA remains the most agile form of innovation funding in the world and has been the most impactful fund for EA Technology, underpinning more than 70% of the products we have in the market today. Retaining the current criteria helps keep the NIA’s focus on activities that address the longer-term challenges facing the energy industry.

During ED2, we have seen the NIA shift predominantly toward social and societal-benefit innovation rather than technical innovation, and we believe this balance should be reinstated so that the fund once again addresses technical challenges at the heart of the future energy system.

We also believe that the NIA should continue to permit limited BAU-transition enablers, the minimum work required to take a proven innovation to deployable status. This includes activities such as interoperability and standards development, the integration of data and

models with DSO systems, cybersecurity and safety assurance, procurement specifications, and targeted training to enable safe adoption. This does not include asset roll-out or capex-heavy deployment, which should instead be supported through the proposed ED3 Deployment Fund or TIM.

NIA funding that delivers support for vulnerable customers or accelerates progress toward Net Zero will continue to enable projects that align with ED3 themes and allow rapid deployment. Innovation is urgently needed in areas such as climate resilience, voltage management, loss reduction, and DER visibility if we are to deliver the future energy system effectively.

A significant challenge emerging from the Plan & Deliver ED3 approach will be the deliverability of required capacity outcomes, and we believe this should be a core focus of the NIA. Maintaining the criteria also prevents early-stage innovation budgets from being diverted into capex-heavy deployment, which should sit firmly within the remit of the Deployment Fund. In addition, it protects the important role of capable third-party innovators who help translate research into practical applications, supporting competition and delivering consumer benefits.

Q55. Do you agree with our suggested approach for assessing and setting NIA? Why?

EA Technology Response:

We support Ofgem's proposed approach, provided it is implemented proportionately and with the right safeguards in place. Ofgem's own RIIO-2 review highlighted inconsistent reporting and weak tracking of consumer benefit, which in turn limits confidence in the outcomes being delivered. A more consistent and transparent assessment method will strengthen comparability and accountability across DNOs. We also agree that linking the NIA to BPI Stage A will help embed innovation into business planning and delivery culture, ensuring that project value is aligned with improving business plan delivery.

At the same time, we believe it is important to retain a baseline allocation within the NIA to protect small, early-stage innovation that delivers long-term value but may not immediately demonstrate quantifiable business plan benefits. Ofgem's approach works well alongside the SIF and the proposed Deployment Fund, helping to create a clear and coherent innovation pathway from concept, to demonstration, to roll-out.

Recommendations

We recommend ring-fencing a small proportion of the NIA, approximately 10 -15% for work that supports replicability and deployment readiness, such as standards development, interoperability activities and training. Clear criteria should be published for releasing any

withheld NIA to ensure the process is fair and transparent. Reporting templates should be aligned across all DNOs, and annual NIA impact summaries should be published that focus specifically on measurable consumer and system benefits. Finally, governance arrangements should remain proportionate to ensure that SMEs and established delivery partners retain access to the fund.

Q56. Do you have examples of projects that weren't able to deploy in RIIO-ED2 due to the lack of funding, or that you anticipate wouldn't be able to deploy in ED3 without the extension of the Deployment Fund to cover DNOs in ED3?

EA Technology Response:

We support extending the Deployment Fund to DNOs to enable in-period roll-out of proven innovation. This extension is important because, as the Energy Systems Catapult reported in 2022, fewer than 20% of innovation projects in RIIO-2 were deployed at scale, primarily due to the absence of dedicated post-trial funding. Similarly, the Ofgem-commissioned *Innovation Value Review* (2023) identified deployment readiness and standards integration as key barriers preventing innovations from realising their full consumer value. Our own independent evaluations of Smart Street (ENWL), Network Equilibrium (NGED) and ConnectMore (SPEN) reached a similar conclusion: although these projects demonstrated clear benefits, their wider adoption was limited by capex constraints, interoperability challenges and evolving standards.

Extending the Deployment Fund will help bridge the 'valley of death' between demonstration (through NIA or SIF) and adoption, which is where most consumer benefits are currently lost. Many DNO-led innovations require sector-wide coordination or standards work before they can be replicated, and this type of activity is difficult to fund or deliver effectively within existing NIA and SIF projects. Providing DNOs with access to the Deployment Fund would accelerate the delivery of proven consumer benefits within the same price control period, rather than deferring progress to ED4.

Q57. Do you perceive a lack of coordination and direction as an issue for the deployment of innovation in the ED sector, and do you think a similar intervention to the TID is needed to resolve this?

EA Technology Response:

We support establishing a DNO equivalent to the Transmission Innovation Deployment (TID) forum. Evidence from the Energy Systems Catapult in 2022 highlighted fragmented governance and a lack of shared ownership as major barriers to innovation deployment. Similarly, the ENA's 2023 work identified poor cross-DNO coordination as a significant contributor to duplication and slow rollout across the sector.

A dedicated DNO deployment forum would add substantial value because many of the barriers to rollout, such as standards, data, safety and interoperability can only be solved effectively through collective action, whether cross-DNO or cross-sector. Such a forum would also help align DNO deployment activity with NESO and RESP priorities, ensuring that efforts are coordinated rather than repeated. Sector-level coordination would further promote consistent measurement of consumer benefits and enable wider, faster adoption of successful innovations into business-as-usual. Innovation at T versus D is significantly different, so we propose ensuring the DID is not simply a copy and paste of TID, however allows for specifics in D-Innovation.

We recommend creating a DNO Deployment Coordination Forum and ensuring that its membership includes BAU value sponsors, not only innovation teams, so that C-Suite sponsors of the problem statements are actively involved. The forum should make use of common benefit-measurement frameworks and shared artefacts to support replication across networks. Finally, outputs from the forum should link directly to the priorities of the Deployment Fund to ensure efficient and well-targeted deployment of proven solutions.

Q58. Do you agree that further incentivisation is needed within the price control for innovation that doesn't primarily benefit networks? Do you have evidence to support this?

EA Technology Response:

We support further incentivisation for innovation that delivers system-wide or consumer benefits beyond direct network cost reductions. EA Technology has identified a number of projects that improve network operation or generate savings for consumers, such as those that reduce non-technical losses, yet have only indirect or limited financial benefits for networks themselves, leaving few mechanisms to progress them. The Ofgem *Innovation Value Review* (2023) also confirmed that projects focused on consumer benefits, such as voltage optimisation and loss reduction, are among the least likely to scale under the current incentive framework. Our evaluations of Smart Street and LV losses programmes

likewise show measurable energy and carbon savings for customers but limited motivation for DNOs to fund wider deployment without specific, targeted incentives.

The reason for this is that existing incentives largely favor internal cost efficiency rather than system-level or consumer value. Projects that deliver broader consumer or whole-system benefits, such as resilience improvements, demand flexibility or losses reduction, often require investment by networks even though most of the benefits accrue externally.

Offering additional incentives in these areas would accelerate whole-system decarbonisation and support more equitable outcomes for consumers. A good example of this type of cross-benefit incentivisation already exists in the form of the Street Works incentives used between GDNs, water companies, and the DNO in London. Open/independent benefits valuation or verification will be key!

Q59. Do you have any feedback on what kind of mechanism would best provide this incentive, while ensuring that networks are only rewarded for actual delivery of consumer or system benefit?

EA Technology Response:

We support the introduction of a performance-based incentive that rewards DNOs for delivering measurable consumer or system benefits. Such an incentive would work by linking rewards directly to independently verified outcomes such as reduced losses, improved voltage performance, enhanced reliability or emissions reductions. Claims should only be submitted once benefits have been demonstrated and measured using agreed industry metrics, for example, losses avoided in kWh or quantifiable improvements in voltage compliance. A shared-benefit model could be applied, allowing DNOs to retain a small proportion of verified consumer savings to ensure alignment without creating excessive rewards. There is also value in incorporating an additional mechanism that encourages DNOs to share outputs and learning, thereby incentivising interoperability and encouraging replication by other networks.

In terms of operation, the incentive should allow joint submissions from DNOs and third parties, enabling DNOs to act as delivery partners even when they are not the direct beneficiaries of the innovation. All learning, methodologies and supporting evidence should be made publicly available to support wider sector adoption.

The benefits of this approach are clear. It focuses rewards on tangible consumer and system outcomes, ensuring strong value for money. It encourages DNOs to prioritise innovations that are scalable and enduring, rather than running isolated trials that do not

progress beyond demonstration. It also strengthens the link between innovation, operational delivery and measurable progress toward decarbonisation and network resilience goals.

Distribution System Operator (DSO) DSO network planning

Q62. What additional data, digital tools, or visibility improvements are needed to enable DSOs to deliver proactive, spatially targeted network planning in ED3? Please provide examples of gaps or best practices.

EA Technology Response:

EA Technology recommends that DSOs adopt a blended approach that combines targeted LV monitoring at modelled high-risk sites with improved LV network models and LV digital twins connected directly to the Connections pipeline. This approach provides ground-truth monitoring where risk is greatest, strengthens forecasting accuracy, and unlocks meaningful headroom at the lowest totex. It also enables proactive, spatially targeted planning during ED3. Ofgem has already highlighted the need to improve secondary network (LV) visibility and resolve persistent data-quality gaps; ED3 is the opportunity to finally close these gaps.

1) Additional data DSOs need (feeder-level granularity)

DSOs require a richer, more accurate set of LV data to enable proactive planning.

LV load and power-quality telemetry should include per-phase current and voltage, THD, transformer temperature and alarms at substations and selected feeders. This information is essential for validating models and calculating real-time headroom. Programmes such as OpenLV and LV-CAP® have already demonstrated that local monitoring and on-site analytics at scale are feasible.

Connectivity and phase mapping to MPANs must be accurate, including service-to-phase, cut-out fuse ratings, service cable type and length, and verified LV topology. Reducing uncertainty in this foundational data has been a consistent feature of DNO LV visibility strategies.

LCT and DER registers should include timely and geospatially linked information on EVs, heat pumps, PV, energy storage, connection queue milestones and flexibility assets, in line with the ENA Open Networks queue guidance.

Open LV data for stakeholders should provide aggregated utilisation and capacity time series accessible via APIs, similar to NGED's LV open data platform.

2) Digital tools to operationalise proactive, spatial planning

To convert data into operational value, DSOs need tools that allow targeted, evidence-led decision-making.

Risk-based siting of monitors, where models identify candidate high-risk feeders and instrumentation then provides validation, has been proven in innovation programmes to improve decision-making and bring planning forward.

LV hosting-capacity engines, including time-series and probabilistic methods, combined with LV state estimation, can translate LV data into actionable headroom values. The literature and field evidence show significant hosting-capacity gains from targeted actions such as phase rebalancing.

Dynamic ratings and voltage-management applications, either at the edge or in the control room, provide non-reinforcement solutions identified in BEIS's LV Network Capacity Study as credible ways of managing LV constraints.

LV digital twins linked directly to Connections workflows allow DSOs to simulate, forecast and automate planning more precisely. Several GB DNOs are already developing common LV models and digital twins to support forecasting and digital self-serve connections journeys.

3) What this delivers (with evidence)

This blended approach has proven its value in multiple GB programmes.

More capacity from existing assets: EA Technology's monitoring applications have unlocked up to ~22% more usable capacity in live networks. National Grid's SILVERSMITH study identified ~15% thermal headroom unlocked through network data monitoring at favorable totex. Together, this supports a credible expectation of double-digit capacity headroom through targeted LV visibility.

Faster, fairer planning and connections: DNO strategies from UKPN, SSEN and ENWL highlight LV visibility, digitalisation and open data as key enablers for improved forecasting, monitoring and investment. Examples include EV-driven LV visibility programmes, open data platforms and rapid digital self-serve quotation tools.

Lower totex and earlier risk detection: OpenLV demonstrated that local analytics reduce data backhaul requirements, provide near-real-time remaining-capacity insights, and enable automated responses. This brings interventions forward and allows reinforcement to be deferred where appropriate.

4) Gaps to close in ED3 (and how)

To maximise the value of LV data, several outstanding gaps must be addressed in ED3.

Data quality and access must improve by resolving GIS-as-built mismatches, completing customer connectivity and phase data, standardising APIs and metadata, and expanding LV open datasets, building on models already demonstrated by SPEN.

Coverage with purpose is essential. DSOs should instrument modelled high-risk feeders first, iterate based on outcomes and publish coverage targets and utilisation insights by feeder category.

Model-twin integration should be mandated so telemetry, hosting-capacity engines and queue data are integrated into a living LV digital twin used daily by planners and Connections teams, with transparent methods and independent audits.

In summary

DSOs should combine model-led risk targeting with real-time LV monitoring, integrated through a live LV digital twin connected directly to the Connections process. This blended approach has already delivered double-digit capacity headroom in GB trials and is the most cost-effective, scalable route to proactive feeder-level planning in ED3.

Voltage management

Q68. Do you agree with the proposed voltage management responsibilities, for DSOs? Are there any aspects you disagree with, or any additional responsibilities we should consider?

EA Technology Response:

Yes, we agree that DSOs should be responsible for coordinated, end-to-end voltage management across EHV, HV and LV networks, with clear duties to maintain statutory limits and to use data-led, cross-level control. Centrally initiated voltage actions can have significant upstream and downstream effects; therefore, visibility must come first, followed by coordinated “Total Voltage Control” (TVC) across assets and DER. This approach

reduces losses, lowers customer complaints, improves system stability and unlocks capacity. It also aligns strongly with ED3's intended evolution of the DSO role and with more proactive, whole-system network operation.

What We Agree With (and Why)

Statutory compliance as the non-negotiable baseline

DSOs have an absolute obligation to keep supplies within ESQCR voltage limits, for example, LV at 230 V with a +10%/–6% band, and HV below 132 kV $\pm 6\%$, measured at the customer's terminals. These statutory duties form the foundation on which any optimisation, flexibility procurement or control strategy must be built.

Coordinated, cross-level control outperforms siloed tactics.

Evidence from GB innovation programmes shows that voltage is managed most effectively when DNOs apply coordinated control across voltage levels rather than isolated interventions:

- CLASS (ENWL) demonstrated that OLTC operation and network switching can provide demand reduction and reactive support while remaining invisible to customers.
- Power Potential (UKPN / NG ESO) proved that DER-provided reactive power can manage transmission-level voltage constraints when coordinated by the DSO.
- Active Response (UKPN) showed how LV/HV power-electronics (SOPs and SPBs) combined with optimisation software can dynamically balance load and manage voltage across feeders.
- LV ENGINE (SPEN) progressed the development of smart/LV OLTC transformers, enabling finer LV voltage control and releasing capacity at secondary substations.
- BEIS's LV Network Capacity Study identified dynamic voltage management and enhanced AVRs as credible, efficient alternatives to reinforcement.

Together, these projects provide a strong evidence base that coordinated voltage management across the whole distribution chain delivers better technical performance, enhances customer service, and supports more efficient and flexible use of the existing network.

Q69. In your view what would be appropriate metrics or KPIs by which the success of delivery of these responsibilities could be measured? For each of these metrics or KPIs, should this target be codified in a licence condition or otherwise incentivised?

EA Technology Response:

DNO measures could include i) staying within statutory/EN 50160 limits, (ii) reducing voltage complaints and time to fix, (iii) unlocking capacity via voltage control (headroom,

MVAr services, hosting capacity), (iv) cutting losses/curtailment, and (v) providing transparent, feeder-level data. Codify the baselines; incentivise the improvements.

Q70. How can we support DSOs in getting access to useful 3rd party voltage data from assets such as EV chargers?

EA Technology Response:

Third-party voltage measurements (e.g., from EV charge points) are useful but complementary to DSO-owned LV monitoring. DSOs should rely on targeted LV substation/feeder monitoring as the backbone, then ingest lightweight, time-stamped samples from third-party devices to calibrate LV models and feed Total Voltage Control (TVC) state-estimation. This achieves feeder-level accuracy without requiring continuous streaming of all device data. Evidence from GB shows (i) smart/connected chargers can provide voltage samples via standard protocols, and (ii) smart-meter voltage alone is patchy and benefits from validation against substation monitors.

What DSOs could benefit from 3rd parties (minimal, high-value fields)

- RMS Voltage per phase (and optional unbalance/THD) + UTC timestamp at the charger terminals; device/connector status; coarse location/feeder mapping. OCPP already supports Voltage as a standard “measurand” in Meter Values; ISO 15118 governs EV charger comms while OCPP carries charger backend telemetry.
- Sampling, not streaming: e.g., 60-s or 5-min snapshots plus event-based exceptions (out-of-band when EN 50160 characteristics are breached). This is sufficient to train and periodically correct LV digital twins/TVC engines.

How to access it in practice (keeping it simple)

1. Use existing standards and intermediaries. DSOs should not integrate to every charger; instead, agree a common OCPP data profile with CPOs/aggregators to expose clock-aligned Meter Values (Voltage) at agreed intervals (and only for opted-in assets). The Open Charge Alliance confirms 2.0.1 as the industry standard; Signed/Clock-aligned Meter Values are already defined.
2. Rely on “smart” connectivity already mandated. GB regulations require new private charge points to have smart functionality and remote comms, this provides the pathway for secure telemetry sharing subject to consent.

3. Data governance = DBP by default. Apply Ofgem’s Data Best Practice (presumed open where possible, clear metadata, privacy-by-design) with EV data aggregated to substation/feeder level before publication/use.

Why this blended approach is needed (evidence)

- Smart-meter voltage is helpful but incomplete. ENWL’s 2025 study found high smart-meter penetration but low usable data availability (~32%) and material mismatches versus substation monitors, supporting a strategy that combines DSO monitoring + third-party samples rather than relying on meters alone.
- Open LV / DNO portals show the path. GB programmes (e.g., OpenLV) and DNO open-data portals already publish aggregated LV utilisation/voltage datasets—EV charger voltage samples should extend, not replace, this fabric.

Proposed framework for Ofgem to enable access (proportionate, low-friction)

- Define a “Third-Party Voltage Data Minimal Set”: {RMS V per phase, timestamp, device status, location to feeder/substation} + optional {unbalance, THD}. Trigger-based exceptions for EN 50160 deviations (rapid changes, flicker, dips).
- Standardise the interface: OCPP 1.6/2.0.1 Clock-Aligned Meter Values for periodic snapshots; permit Signed Meter Values where assurance is required; map assets to feeders via CPO metadata/addresses.
- Consent & privacy: adopt DBP principles (purpose limitation, minimisation, FAIR metadata); default to anonymised/aggregated feeder-level sharing, with customer-level data accessible only under explicit consent or legitimate interest for PQ investigations.
- Commercials/incentives: light-touch allowance for DSO integration/setup; optional performance incentive for DSOs that (i) publish feeder-level voltage quality/open datasets and (ii) demonstrably reduce voltage complaints or increase headroom using third-party samples. (Precedent: open LV monitoring datasets and DSO data exchange guidelines.)

Q74. Do you support the requirement for a published voltage management strategy from each DSO, with an annual reporting requirement?

EA Technology Response:

Yes, this will help technology companies such as ours prepare real world solutions to support the DSO's journey.

Q86. What are your views on setting outputs on additional asset classes not currently reported in NARM?

EA Technology Response:

The remaining asset categories present several practical challenges which must be carefully considered before setting formal outputs within NARM:

1. Data availability and collection feasibility: For some asset types (e.g., underground cables), it is difficult or uneconomic to collect meaningful condition data due to accessibility. Similarly, assets that are low-cost or easily replaceable may not warrant the same data collection effort as higher value, more strategic assets (such as substation plant).
2. Short-life or routinely replaced assets: Certain assets, such as battery systems, typically follow a time-based replacement strategy, meaning condition-based risk modelling may add limited value.
3. Highly diverse asset categories: Groups such as cable bridges encompass a broad range of designs, materials, and operating environments, requiring more granular and bespoke modelling approaches.
4. Limited population sizes: Some asset types, such as LV transformers and regulators, exist in relatively small numbers, making statistically meaningful modelling and benchmarking more difficult.
5. Emerging datasets: In some cases (e.g. service cut-outs), data collection processes are ongoing, and so creating a model at this stage would not be viable until a higher proportion of the assets have been inspected.

While it is possible to adapt the NARM methodology to develop risk-based outputs for many of these asset classes, confidence in these outputs will not yet match that of the original 61 CNAIM v1/v2 categories. DNOs have already undertaken significant work to extend the methodology to a further 26 asset categories, a substantial effort that has yielded mixed levels of model confidence.

Introducing these new categories directly into the formal NARM framework could prove challenging. A more flexible, staged inclusion may be more appropriate, for example, by

applying wider deadbands, lighter-touch reporting, or provisional outputs until sufficient evidence and confidence are built.

A gated or phased approach would allow DNOs to strengthen model robustness, gather additional data, and refine methodologies before these asset classes contribute fully to incentive mechanisms.

Over time, working toward more complete asset inclusion will benefit customers, DNOs, and Ofgem by improving transparency, aligning investment decisions, and enhancing benchmarking capability.

Finally, any approach to standardisation should maintain space for innovation in model development. As models evolve through collaboration between DNOs and technical specialists, it is important that frameworks protect commercial incentives to innovate while still promoting comparability and transparency.

Q87. What are your views on our proposed approach to increasing our reporting on non-NARM assets to improve our understanding of asset health?

EA Technology Response:

We agree that extending reporting to include non-NARM asset categories is both positive and necessary. Doing so will offer a more complete picture of network condition and risk, enabling better-informed decision-making by DNOs, Ofgem and customers. However, we believe reporting should not focus solely on asset health. For most asset types, it is feasible to assess the consequences of failure alongside condition, allowing the calculation of a full Health Index and Criticality Index (HI/CI). This would provide a more accurate understanding of overall risk exposure and help prioritise investment more effectively.

We also recognise that not all additional asset categories will be suitable for modelling in the same way as the original CNAIM classes. In some cases, particularly where data availability, asset criticality or population size is limited, a simpler, proportionate methodology may be more appropriate than a full, complex risk model. For this reason, we recommend that Ofgem adopt a tiered reporting approach that allows different levels of modelling sophistication depending on data quality, criticality and methodological maturity. This would maximise transparency without creating unnecessary burden or giving a false sense of precision.

In the longer term, improved reporting across all asset types will enable DNOs and their technical partners to refine methodologies progressively, strengthen data confidence and move toward full HI/CI outputs within a consistent, industry-aligned framework.

Q88. What are your views on our approach to enhancing data assurance on the data input into the NARM? Are there alternative ways we could enhance our data assurances processes?

EA Technology Response:

We agree that robust data assurance is essential for all asset classes, both within and outside the NARM framework. Because NARM data is directly linked to DNO investment plans, it is critical that condition assessments and the underlying measurements accurately reflect the true state of the network, within reasonable tolerances. The NARM process already includes mechanisms that strengthen consistency and objectivity. For example, the Good Practice Guide and the refinements to condition point notation introduced in CNAIM v2 have both reduced ambiguity and improved transparency in the interpretation of condition data.

Information Gathering Plans (IGPs), which DNOs have previously submitted, remain an important tool for understanding the population and quality of datasets used within CNAIM. There is an opportunity to make fuller use of these plans, particularly to highlight dataset completeness, confidence levels and those areas where data-quality improvement work is ongoing.

Data assurance should also extend beyond simple completeness and cover broader dimensions of data quality. Latency is important because inspection and test data lose relevance over time; given the size of the asset base and multi-year inspection cycles, some degree of divergence between stored data and current condition is unavoidable. Accuracy and consistency must also be considered to ensure that condition scoring is applied uniformly across assessors and regions, validating that the Good Practice Guide is being used effectively. Traceability is equally important, ensuring that condition scores have clear links back to their source data and supporting evidence.

A risk-proportionate approach to data assurance is essential. High-impact, critical assets should be subject to more frequent review and tighter tolerances around data latency, while high-volume, lower-criticality assets should be managed with a more relaxed approach to avoid unnecessary administrative burden. As future iterations of IGPs are developed, the concept of materiality should be explicitly recognised. Not all data points

contribute equally to risk calculations, and priority should be given to those that directly relate to primary failure modes. DNOs should not be expected to collect every conceivable data point where doing so delivers little incremental value.

It is also important to acknowledge that the CNAIM framework itself naturally incentivises data completeness and integrity. Insufficient or poor-quality data directly restricts achievable health scores, creating an in-built mechanism that reduces the need for heavy external enforcement. For that reason, we support the use of independent audits as a source of assurance for Ofgem and customers, provided that such audits are proportionate to risk, sensitive to the realities of data latency and inspection cycles, and constructive in helping DNOs enhance their reporting and data-management practices over time.

Overall, the aim should be to maintain a balanced assurance regime that provides confidence without unnecessary burden, one that recognises the dynamic nature of asset data, encourages continual improvement and reinforces the integrity of the NARM process.

Q89. What are your views on introducing subsidiary targets in NARM to hold DNOs accountable to their Business Plans? Are there other ways we could hold DNOs accountable?

EA Technology Response:

We consider the ability to risk-trade across asset categories to be a fundamental strength of the NARM framework. This flexibility allows DNOs to evolve their delivery strategies throughout the price control period, adapting to uncertainty and changing conditions while still keeping overall network risk within acceptable limits. It enables risk to be managed holistically and efficiently across the entire asset base, rather than in isolated silos.

The consultation appears to express concern that DNOs might “game” the system by focusing disproportionately on the most cost-effective interventions, those with the lowest cost per risk point, while neglecting lower-return areas. In practice, we do not believe such behaviour offers any long-term advantage. The existing incentive structure, combined with ongoing regulatory scrutiny, already ensures that investment decisions remain aligned with business plan commitments and wider network-performance outcomes.

Introducing subsidiary targets, whether by voltage level, asset class, or another subdivision, would constrain this flexibility unnecessarily. Such constraints would undermine one of NARM’s core advantages: its ability to optimise investment across the entire network to deliver the greatest overall risk reduction for consumers.

Ofgem already has sufficient visibility and oversight through the DNO reporting pack, which presents disaggregated data by asset type and by voltage level. This level of detail provides ample transparency to identify and challenge any unjustified deviation from business plan intentions. In addition, the NARM close-out methodology offers further assurance that DNOs are delivering their plans as agreed while still allowing reasonable adjustment to reflect emerging risks, changes in asset condition or other external circumstances.

Introducing fixed sub-targets could also create unintended consequences. It is likely to increase the number of re-openers, as DNOs would seek adjustments for unforeseen events that limit their flexibility. It could also reduce willingness to extend NARM coverage to new asset categories, given the increased compliance and delivery risks associated with additional constraints.

On balance, we believe that maintaining the current risk-trading flexibility, supported by the existing reporting requirements and close-out arrangements, remains the most effective way to ensure accountability while enabling efficient, adaptive and customer-focused network management.

Q90. Do you agree with our approach to enabling the future effects of climate change on asset deterioration to be modelled in NARM?

EA Technology Response:

Asset health is calculated using an inclusive measure based on objective data that reflects an asset's current condition. The calculation does not explain how that condition came about; rather, it captures the observed state through inspection and test results. This is the correct approach, as an asset's condition naturally embodies the cumulative effect of its operating environment, usage, maintenance history and other influencing factors. In this sense, climate effects are already captured implicitly through their impact on physical condition, even if they are not modelled explicitly.

Only the *future projection* of asset health should therefore take into account the specific impacts of climate change. These climate-related effects should be limited to those that directly influence asset deterioration rates and should not be conflated with external hazards such as flooding, high winds or other environmental events. Such external hazards are better represented through resilience metrics or other forms of external risk assessment.

We agree that there is currently insufficient empirical evidence to quantify the relationship between climate projections and asset degradation with confidence. However, if new

research becomes available during ED3, the ability to update or calibrate deterioration rates to reflect that evidence will help improve model accuracy and strengthen the foundation for future investment decision-making.

For these reasons, building in the capability to incorporate climate-related deterioration effects represents sensible future-proofing of the NARM models. It ensures that once credible data is available, it can be integrated smoothly without requiring structural changes to the framework, thereby maintaining continuity and comparability over time.

Reliability

Q98. What is the impact of short interruptions on consumers and are certain regions or customer groups more affected? Do you expect the severity of these impacts to change over the ED3 period? If so, in what way and why?

EA Technology Response:

We agree that short interruptions continue to cause meaningful disruption and inconvenience for consumers, particularly where sensitive equipment or business operations are affected. EA Technology manufactures and supplies Auto-Reclosers, such as the ALVIN Reclose, which automatically reclose on transient faults. These devices significantly reduce the duration of unplanned interruptions, although they do still generate short interruptions when clearing faults. This technology has delivered clear benefits in reducing both Customer Interruptions (CI) and Customer Minutes Lost (CML), and is now used by DNOs as a temporary mitigation measure ahead of planned permanent repair.

Although EA Technology does not hold consumer segmentation data, operational evidence shows a strong correlation between severe rainfall and transient faults on underground network fault types that are closely linked to short interruptions. Looking ahead to ED3, we expect two opposing trends to shape the picture. On one hand, wider deployment of smart protection solutions such as Auto-Reclosers and remote sectionalisation will likely increase the number of sub-3-minute interruptions, while dramatically reducing the duration of longer outages as more transient faults are automatically cleared. On the other hand, total outage duration and overall customer impact will continue to decline as automation enables faster restoration and more targeted repair scheduling.

Although more extreme weather may increase the number of faults, the net effect should be improved reliability as DNOs enhance visibility and adopt more proactive fault-management practices. Technology such as ALVIN reclosers has already demonstrated a significant improvement in LV reliability when combined with updated operating processes

and proactive LV pre-fault approaches. In practice, this combination can reduce the overall impact on customers by more than 50%.

Q99. What drives short interruptions and how can these be reduced? Could innovation, data analytics, and enhanced network visibility play a role in reducing the frequency and impact of short interruptions? If so, how?

EA Technology Response:

EA Technology's primary experience with short interruptions relates to transient faults on underground cable systems, which typically arise from the deterioration of insulation or joints. These faults occur when water or other contaminants breach the insulation, causing momentary short circuits. The result is a brief loss of supply until protection equipment recloses.

To address this, EA Technology provides proactive pre-fault insights through its LV monitoring solutions. These insights enable DNOs to identify, with high accuracy, both the location and the likely time window in which a pre-fault is expected to convert into a failure. Many operational teams now act on this information to remedy issues before a fault occurs. Where a repair cannot be completed in time, the use of a recloser is recommended as a temporary mitigation.

EA Technology's ALVIN Reclose2 system, now scaling across UK DNOs, autonomously recloses on transient faults. This restores supply within three minutes and significantly reduces the duration of unplanned interruptions. Through the Foresight NIA collaboration with Northern Powergrid, EA Technology further demonstrated that LV underground cable faults can be predicted by analysing pre-fault waveform disturbances. These predictive algorithms have since been refined to estimate both time to failure and likely fault location and are now embedded within EA Technology's LV monitoring platforms, which have been deployed across more than 30,000 substations and 150,000 LV circuits during ED2.

DNOs are using these tools to target failure-prone circuits, with more than 60% of circuits flagged as "imminent failure" subsequently failing within 12 months, a level of accuracy that strongly validates the predictive methodology. By acting proactively on this data, DNOs can repair or replace at-risk assets before failure occurs, preventing both sustained outages and short interruptions.

Further innovation, along with stronger incentives for proactive fault prevention, such as mechanisms that reward avoided CI and CML (with the measured data to back this), would encourage even wider adoption of predictive analytics and LV visibility solutions in ED3.

Supply Chain and Workforce

Q111. Do you agree with our proposal to require a ten-year Delivery Strategy (ED3+ED4) that embeds supply chain and workforce plans? Are the content expectations complete and proportionate? Where should we be more/less prescriptive and why?

EA Technology supports Ofgem's proposal to provide a long-term Delivery Strategy that integrates both supply-chain and workforce planning. A multi-period strategy will provide essential long-term visibility, enabling suppliers, educators and investors to scale production, expand training provision and strengthen UK industrial capacity in step with network needs. However, some flexibility should be considered to enable the fast adoption of emerging skills, whose importance is not obvious at the start of the 10 year Delivery Strategy.

We agree that a unified approach linking supply-chain readiness and workforce resilience is critical to meeting decarbonisation and electrification goals at pace. However, we recommend greater prescription in a few key areas to ensure that the strategies deliver meaningful, measurable outcomes.

Supporting Evidence

There are several key challenges that must be addressed to ensure the sector can deliver at the scale required. One of the most significant is the need for long-term visibility. Supply chains are currently operating with very limited certainty beyond the five-year price control period, which discourages capital investment in UK manufacturing capacity and limits the development of training pipelines. The sector is also facing a growing skills shortage and an ageing workforce, with around half of DNO technical staff approaching retirement age. Without sustained recruitment, reskilling and retention, delivery capacity will increasingly be constrained. In addition, volatile, stop-start procurement cycles under previous price controls have created knock-on effects that undermine supplier confidence and raise costs for consumers.

EA Technology brings several capabilities that speak directly to these issues. The company has built a UK-based supply chain that supports around 1,700 manufacturing jobs, concentrated mainly across the North of England and Scotland. EA Technology also operates the largest independent power-sector training centre in the UK, supporting roughly half of all DNO technical apprenticeship demand. The business has expanded its LV monitoring manufacturing capacity ten-fold and maintains more than 40% standby

production capability to mitigate supply bottlenecks. In parallel, EA Technology provides overflow installation services and asset-monitoring solutions that help DNOs maintain delivery continuity when internal workforces are at full stretch.

Recommendations

1. Increase confidence for the market

Ofgem could require each DNO to submit a long-term Delivery Strategy that includes annual equipment and workforce volume forecasts over a ten-year horizon, along with phasing plans that demonstrate a smooth progression of workload across ED3 and ED4. This would provide stability and visibility to suppliers, enabling them to plan investment and capacity more effectively.

2. Strengthen prescription in supply-chain planning

Ofgem could support greater transparency by encouraging the publication of annual volume forecasts for critical components such as transformers, switchgear and cable, allowing manufacturers to secure production slots earlier. This should be supported by clearer mapping of strategic suppliers and identified bottlenecks—such as the availability of SF₆-free switchgear—along with the mitigation strategies in place. Long-term framework contracts with UK-based manufacturers and service providers would help stabilise investment and support domestic job creation. Social-value and sustainability criteria should also be incorporated to ensure alignment with Ofgem’s growth duty and net-zero objectives.

Expand workforce-related expectations

Workforce Resilience Plans should be retained but strengthened, requiring more granular regional and discipline-specific forecasts from DNOs. Collaboration with accredited training providers, such as the National Skills Academy for Power and EA Technology, should be mandated to ensure the training pipeline keeps pace with sector demand. Workforce plans should also include metrics related to diversity, wellbeing and productivity to help attract new entrants and support a more inclusive sector.

Q112. Do you agree that DNOs should publish annual equipment and people volumes for ten years to provide better market visibility? What minimum granularity would be most useful to suppliers and training providers?

EA Technology supports the proposal that DNOs publish annual equipment and people volumes over a rolling ten-year horizon, however appreciate the difficulty in achieving accuracy over such a long horizon, a more confident 5 year view which supports or

underpins a 10 year view would be more useful and investable for EA Technology- possibly consider a rolling 5 year?

Q114. Should we introduce a supply chain and workforce monitoring framework for ED3 and future price controls? What metrics and reporting frequency would provide the greatest value while remaining proportionate?

EA Technology supports Ofgem’s proposal to introduce a Supply Chain and Workforce Monitoring Framework for ED3 and beyond. Real-time visibility of delivery capability is essential given the scale of network investment required to meet net zero. To be effective, the framework must be standardised across all DNOs, aligned with Business Plan Data Templates and Delivery Strategies, include both forward- and backward-looking indicators, and remain proportionate in its reporting burden. A well-designed framework would provide DNOs, Ofgem, government and suppliers with a shared evidence base to identify risks early and intervene before bottlenecks develop.

Possible Metrics

A. Supply Chain Metrics

EA Technology recommends a concise set of indicators across five themes to monitor capacity and resilience:

- Capacity: Manufacturing utilisation for key components to reveal emerging bottlenecks.
- Resilience: UK-based spend, supplier diversity and dual-sourcing coverage to track risk concentration.
- Contracting: Framework contract duration to support investment confidence.
- Sustainability: Supplier carbon-reduction policies and ESG compliance to align with Ofgem’s duties.
- Delivery Performance: On-time delivery and cost variance to flag slippage or price pressure.

B. Workforce Metrics

Building on the NSAP taxonomy, workforce monitoring should cover:

- Headcount & Skills: FTE by discipline to map critical capacity.

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- Training Pipeline: Apprenticeship and retraining throughput to assess future readiness.
- Diversity & Inclusion: Representation metrics to track sector sustainability.
- Attrition & Retention: Turnover by skill category to identify risks.
- Regional Distribution: Workforce location relative to regional demand to support balanced growth.

Reporting Frequency

To maximise value while remaining proportionate, EA Technology recommends:

- Quarterly internal reports to Ofgem and industry partners for early risk intervention.
- An annual public report summarising trends with Board assurance.
- A mid-period ED3 review in Year 3 to validate assumptions and recalibrate targets as needed.

This framework should be a live management tool, not a compliance exercise, ensuring the electricity distribution sector remains capable, resilient and ready to deliver the once-in-a-generation network build-out ahead.

Q117. What is the current level of UK content and social value in supply chains for distribution network investment?

EA Technology's position is that the sector currently lacks a consistent, comparable baseline for assessing UK content and social value within DNO supply chains. Evidence today is fragmented across company-specific disclosures and contracts, making it difficult to form an accurate national picture. In practice, UK content tends to be strongest in service-based activities, such as design, civils, installation and training, while it is weaker for long-lead manufactured equipment including transformers and HV switchgear, where global supply chains dominate. We therefore support Ofgem's call for evidence and welcome the opportunity to establish a proportionate and standardised baseline for ED3.

Supporting evidence

Ofgem's ED3 consultation explicitly invites new evidence on UK content and social value, reflecting the fact that current data is inconsistent and incomplete. At the same time, the structure of the global market, where several long-lead items are supplied internationally,

means that UK share will remain limited unless the sector provides long-term visibility and stable commitments to suppliers. Without these conditions, domestic investment and resilience inevitably lag behind.

EA Technology capability (illustrative example)

On social impact, independent valuation shows that for every £1 of EA Technology revenue, £9.60 of economic impact and £1.90 of societal wellbeing is generated. These benefits arise from avoided outages, increased grid capacity, deferred reinforcement and workforce development. As an APAR Main Provider, EA Technology has trained more than 10,000 power engineers over the last decade, directly supporting workforce needs for ED3. EA Technology's VisNet Reclose technology also prevented over 12.4 million minutes of grid outages in 2024, demonstrating tangible consumer-facing social value today.

On UK content, EA Technology's headquarters and ~300 employees are based in Capenhurst, anchoring design, testing, training and service capability within the UK. The company also operates a domestic manufacturing ecosystem. These suppliers already align closely with DNO footprints such as SPEN, ENWL, NGED, SSEN and UKPN, offering a practical route to growing UK content where efficient. Environmental credentials are also strong: the UK HQ operates on 100% renewable electricity, includes EV charging and is progressing measurable Scope 3 reductions.

To create a fair and consistent baseline for ED3, Ofgem could define "UK content" as spend with UK-registered suppliers (by tier), UK value added in manufactured equipment (assembly, testing and key sub-components), and UK-delivered services such as design, surveys, civils, installation, commissioning, data/digital and O&M. "Social value" could include apprenticeships and training throughput, re/multi-skilling, local employment, diversity and early-career representation, supplier ESG and carbon-reduction commitments, logistics decarbonisation and, where appropriate, outcome-based measures such as SROI. Corresponding baseline metrics could track: (1) % UK supplier spend by asset category and project type, dual-sourcing coverage and the UK share of service delivery; and (2) annual workforce and inclusion metrics, sustainability indicators, and optional economic-impact valuations. Together, these provide a proportionate and comparable framework for assessing UK content and social value across all DNOs.