

## Combined Call for Evidence Submissions

### Respondent 1

Feedback in relation to UKPN – DSO team as per the call for evidence on behalf of Roadnight Taylor, The Independent Specialist Grid Consultancy.

#### 1. Delivery of DSO benefits

- Level of ambition – 10: Excellent levels of ambition; always looking to push the limits as much as possible, exploring where it is possible to find new solutions or data. UKPN stand out as being the most open to engage with relating to a DSO team.
- Benefits realisation – 10: RT engages with the DSO team in several areas, in particular on the curtailment estimation tool. This has been a significant benefit to customers in understanding their curtailment risks and where further analysis is needed. The data released helps to support both demand and generation customers looking to connect to the network.

#### 2. Data and information benefits

- Scope, granularity and accuracy of data – 10: Significant data releases including the large demand acceptance list, which is a particular benefit to customers making good decisions. No other DNO publishes an accepted demand register. Overall, the accuracy of the data is also better than other DSO teams.
- Accessibility of data – 10: RT have had no issues with the accessibility of the data from UKPN.

#### 3–5. Other criteria (not assessed)

- Flexibility market development – N/A (no specific engagement).
- Options assessment and conflicts of interest mitigation – N/A (no specific engagement).
- Distributed energy resources (DER) dispatch decision-making – N/A (no specific engagement).

### Respondent 2

Please accept this response to the DSO Performance Panel 2025/26 call for input. I apologise that this is being submitted shortly after the stated deadline. Given it is being sent early the following morning, I would be grateful if Ofgem could still take this evidence into consideration.

I am responding as Head of Grid at Blake Clough Consulting, based on my own experience of working with UK Power Networks' DSO. This response can be treated as non-confidential and published.

Overall, my experience of UKPN's DSO performance has been exceptional. UKPN consistently goes above and beyond in its DSO activities. In my experience, it not only makes sure it is doing what other DSOs are doing, but is often leading the way. If I were scoring UKPN against the assessment criteria, I would score it 10 across all relevant areas based on my experience.

My main interactions with UKPN DSO relate to curtailment and DERMS, NODD, the open data portal, heat maps, capacity maps, curtailment data, network plans, and LTDS data. These tools and information sources are used regularly in our work to support customers and inform connection-related advice. In practice, we have not needed to ask UKPN for data very often, because the information we need is usually already available. Where anything is missing or unclear, UKPN is highly responsive and will look into it quickly.

From a stakeholder perspective, UKPN is extremely easy to engage with. We have a very good working relationship with the DSO team. It is possible to send an email or arrange a call, and I have confidence that UKPN will make a genuine effort to provide a useful answer. For general DNO or DSO queries across Great Britain, UKPN is often the path of least resistance because of the quality, speed, and practicality of its responses.

Against the "Delivery of DSO benefits" criterion, UKPN's data and insight materially improve the quality and speed of connection viability assessments. This helps us provide customers with more accurate advice, faster. Better information supports more informed decisions on whether, where, and how projects should progress. In turn, that helps reduce uncertainty, supports efficient connection outcomes, can reduce curtailment risk, helps avoid unnecessary reinforcement, and ultimately supports carbon savings where viable low-carbon projects are able to connect. These are practical DSO benefits being realised now, not just theoretical or future benefits.

Against the "Data and information provision" criterion, UKPN is particularly strong. We regularly use UKPN's heat maps, capacity maps, curtailment data, network plans, LTDS, and open data portal. In our experience, UKPN's data is accessible, well maintained, and comparatively complete. Its LTDS data is the most complete of any DNO we work with. The data is fundamental to our decision-making and to the advice we provide to customers. It allows us to work more accurately and efficiently, which benefits the customers and projects we support.

The only notable data gap is the absence of a demand capacity register, but this is a wider GB regulatory issue rather than a UKPN-specific failing. UKPN has been a key part of pushing this forward, and we understand that this is expected to be available next year. More generally, where methodologies or assumptions are unclear, UKPN is willing to explain them and to improve how information is presented for stakeholders. This is exactly the type of responsive, stakeholder-led improvement that the DSO incentive should encourage.

Against “Flexibility market development” and related issues, I am not responding as a flexibility provider or market participant. However, from a consultancy and customer-advisory perspective, UKPN’s curtailment and DERMS information is clear and helpful in understanding the role of flexibility options, particularly for demand, ahead of reinforcement. This provides practical value because it helps stakeholders understand the network context and the options available before decisions are made.

On “Options assessment and conflicts of interest mitigation”, from my interactions with UKPN DSO, I have not seen evidence of conflicts of interest adversely affecting outcomes. To the contrary, UKPN DSO appears open, engaged, and willing to improve its data and services wherever sensible stakeholder ideas are raised. I have not experienced UKPN dismissing reasonable suggestions. The team is consistently willing to engage and to continue improving.

On “DER dispatch decision-making”, my relevant experience is mainly through UKPN’s curtailment and DERMS-related information rather than direct participation in dispatch. From that perspective, UKPN’s approach is clear, useful, and supportive of informed decisions by DER and demand customers.

In summary, UKPN DSO is a standout performer. Its data provision, stakeholder responsiveness, and practical support materially improve the quality and speed of our work, which in turn benefits our customers. UKPN makes it easier to understand network opportunities and constraints, supports better project decisions, and provides a level of accessibility and engagement that I consider industry-leading.

I would encourage Ofgem and the DSO Performance Panel to give strong positive weight to UKPN’s performance in the 2025/26 assessment.

### Respondent 3

I am writing to provide my feedback on behalf of SGN in relation to our collaboration with UK Power Networks DSO over the year, April 2025 -March 2026. My feedback relates to the following aspects - ‘the distribution network company is taking a proactive role on regional cross vector investment planning and interfacing with local actors (e.g., LA and GDNs)’. As previous members of the Energy Networks Association, I have worked closely with UK Power Networks’ DSO since April 2023. Lynne McDonald, Head of Local Net Zero and Venus Tam, Net Zero Associate, enabled and spearheaded collaboration between electricity and gas networks to launch the “Collaborating for local net zero planning and delivery (Dec 2023), Energy Networks Association (ENA)”. In the same year we continued our collaboration by sharing our network data with the Local Net Zero team for their LAEP+ planning tool to facilitate local authorities’ decarbonisation planning. Over 2024/25, we jointly developed alongside Cadent and the Local Net Zero team a standardised data

template, the Local Authority Common Ask which is an expansion on UK Power Networks' DSO Data Dictionary. The Local Authority Common Ask has enabled local authorities to share their forecasts from their Local Area Energy Plans (LAEP) and informs our network investment. It was used in 2025/26 by the Greater London Authority (GLA) to share data relevant to the Outer East Subregional Phase 1 LAEP that covered five London Boroughs. Through the Local Authority Common Ask, data can be shared once in a common template, meaning that the GLA only had to share data with gas and electricity network operators once in simple format. To conclude, we would be happy to share further information and details on this in support of the 2026 Call for Evidence.

#### Respondent 4

I am writing to provide my stakeholder feedback as evidence for the call for evidence on Distribution System Operator (DSO) performance in 2025/26 based on the DSO Performance Panel assessment criteria:

Delivery of DSO Benefits: Criteria evidence 'that the distribution network company is taking a proactive role on regional cross vector investment planning and interfacing with local actors (e.g., LA and GDNs)': Since their inception three years ago, UK Power Networks' DSO Local Net Zero team has been pivotal in the development of our county-wide LAEP. Their regular and friendly advice has been vital, including options for assistance with planning that can all be found on the Your Local Net Zero Hub website, and regular training and Q&A sessions for all the digital tools. The team consistently provide support through answers to our questions during our regular catch-up calls and our steering/working groups.

Options assessment and conflicts of interest mitigation: Criteria evidence 'The network options assessment has demonstrated how wider whole system options have been assessed to deliver identified needs at lowest cost': Our monthly engagements with our Account Manager have provided us with a good understanding of UK Power Networks' network planning processes, in particular how energy plans data are included to enhance UK Power Networks' DFES and in turn influence the network options assessment. We shared our data using the Local Net Zero team's data dictionary, now expanded to Local Authority Common Ask, and provided evidence for the completion of the confidence assessment developed by the Local Net Zero team. Their rigorous approach gives us confidence in how our forecasts and plans are being considered in network planning processes.

Data and information benefits: Criteria evidence 'The distribution network company is leading the sector in promoting planning, operations and market data availability' and 'The distribution network company is sharing underlying methodologies and other insights beyond output data': Data is readily available to us, both on request and via the Local Area Energy Planning (LAEP) Open Data Portal, assisting with our planning. Over the last year,

we have used the LAEP Open Data Page to understand how UK Power Networks' network (headroom, flexibility areas, etc.) may influence our network planning. The Regional Energy Dashboard, and the enhancements to the NODD dataset, within the UK Power Networks Open Data Portal has simplified network data and clarified the link between those datasets to decision-making and new policy for our districts in a user-friendly, customer-focused design.

We have attended training and onboarding sessions that are available on request and on a regular, bi-monthly basis to help us make the best use of the LAEP Open Data Portal and LAEP+ planning tool, providing opportunities to ask questions as needed. We are actively using the LAEP+ planning tool to develop projects that will enable us to bring our LAEP outputs to life. The Local Net Zero team provided us with a dedicated training session that helped us and our districts make better use of the tool.

Our transport team used ChargePoint Navigator to support our LEVI funding application. Through the tailored ChargePoint Navigator training sessions and webinars, the tool is helping us access tangible and reliable network and forecast data for determining our electric vehicle infrastructure (EVI) site list. The easy-to-access guidance in the tool and the Local Net Zero Team's availability have enabled us to make best use of ChargePoint Navigator. Using the built-in datasets and connections functionality has helped us find the best locations for electric vehicle charging points across a range of scenarios and requirements.

Please consider this evidence as part of your 2024/5 assessment of the DSO's efforts in delivering value to us and other customers.

## Respondent 5

I would like to share my customer experience and feedback on UK Power Networks' DSO performance from April 2025 to March 2026, based on the DSO Performance Panel assessment criteria:

Delivery of DSO Benefits: 'that the distribution network company is taking a proactive role on regional cross vector investment planning and interfacing with local actors (e.g., LA and GDNs)'

We have been working closely with the Local Net Zero team, namely Flora Mavri (Net Zero Associate) our Account Manager over the last three years. We have been able to get support for our; LEVI funding applications, and EV charging point roll-out and planning through our monthly calls with Flora and in-person meetings and events that UK Power Networks DSO

organise. This also includes a most recent meeting with our charge point operator delivery partner and installer.

Data and information benefits: Criteria evidence ‘The distribution network company is leading the sector in promoting planning, operations and market data availability’ and ‘The distribution network company is sharing underlying methodologies and other insights beyond output data’:

Our journey with ChargePoint Navigator has been a delight. Being one of the first local authorities to access ChargePoint Navigator, we have developed our electric vehicle infrastructure (EVI) roll-out proposals. Through the tailored ChargePoint Navigator training sessions and webinars, the tool has helped us access tangible and reliable network and forecast data for determining our EVI site list. The DSO Local Net Zero team and Field Dynamics, the tool provider, have responded to all our requests for system development, such as incorporating additional datasets or changing the design of the tool. Using the built-in datasets and connections functionality has helped us find the best locations for electric vehicle charging points across a range of scenarios and requirements. The new connectable cable and connection cost estimate datasets will be so important in helping us pinpoint with more precision where we want to connect. This will help us save costs and ensure connection timelines are minimised. We have been able to onboard our charge point operator delivery partner to ensure tracking of charge point delivery on the tool using the relevant Summary Dashboard.

As part of your 2025/6 performance panel assessment, I welcome you to recognise the DSO's efforts in delivering exceptional customer service.

### Respondent 6

I am writing in response to the call for input to provide evidence from recent ENA collaborative research undertaken by Create Clarity and DJS Research across all GB distribution network operators.

This research found consistently low levels of customer awareness of ‘unlooping’ and limited understanding of how network constraints may affect the installation of low carbon technologies (LCTs) such as EV chargers and heat pumps. Customers typically only become aware of these constraints late in the process, often resulting in delays, increased costs and reduced confidence in the connections journey.

The research also identified a clear stakeholder need for accessible, self-serve tools that enable customers, installers and local authorities to understand network readiness at an early stage – ideally through simple inputs such as postcode or MPAN. This is particularly important for local authorities and housing providers delivering large-scale retrofit programmes, where early visibility of constraints is critical to planning and delivery.

In this context, I recently attended the DSO Conference in Manchester and observed a demonstration of SP Electricity North West’s LCT Readiness Checker. This tool directly addresses the gap identified in the research by providing property-level insight into network constraints, including looped supplies, in an accessible and user-friendly format.

From an independent perspective, this represents a practical example of how DSOs can translate customer insight into tangible solutions that improve the connections experience, reduce delays and support more efficient deployment of LCTs.

More broadly, tools of this nature have the potential to deliver wider system benefits by enabling earlier identification of constraints, improving co-ordination with local authority retrofit programmes, and supporting more efficient use of network capacity.

In our view, the development of accessible, data-driven tools to improve visibility of network readiness is an important area of DSO capability, and one where approaches such as this could be replicated more widely across Great Britain.

## Respondent 7

This response is submitted on behalf of SP Energy Networks’ (SPEN) independent DSO advisory body, which provides scrutiny and constructive challenge of SPEN’s DSO transition across its SPM and SPD licence areas.

Throughout 2025/26 the body operated as the DSO Advisory Panel within SPEN’s Independent Net Zero Advisory Council (INZAC) structure. During that period the Panel was chaired by Martin Kearns, with Janet Wood, Jovica Milanovic, David Flynn and Jianzhong Wu as members.

With effect from March 2026, in response to feedback from Ofgem, the body has been reconstituted as a standalone DSO Advisory Group. Matt Vickers has taken over as Chair and is also a member of SPEN’s Independent Stakeholder Group, which is chaired by Angela Love. Revised Terms of Reference for the standalone Advisory Group are currently in development.

Because this submission looks back at activity during 2025/26, references to past work in the criterion-by-criterion sections below use “the Panel” (the body that carried out that work under the INZAC structure). References to forward-looking matters, governance evolution and the body that will continue this scrutiny use “the Group”. Following Iberdrola’s acquisition of ENW Ltd, which has its own DSO function, the future relationship between SPEN’s DSO and its ENW Ltd counterpart is under consideration to maximise combined benefits. SPEN DSO has nonetheless moved quickly during the year to adopt approaches that demonstrate clear customer benefit, including the Customer Load Active System Services (CLASS) dynamic voltage control approach originated by ENW Ltd.

During 2025/26 the Panel met five times, including a deep-dive on data, and members attended SPEN DSO’s Flex Summit. The observations below are structured against the five DSO Performance Panel assessment criteria set out in Ofgem’s call for input.

### Headline observation

In a year of significant organisational change, the Panel’s overall view is that SPEN has stepped up its DSO delivery materially. Notable progress has been made in the benefits framework, in the maturity and traction of flexibility activity, and in data and information provision. SPEN DSO recognises that there is still more to do, particularly in translating its work into outcome-based KPIs that will remain meaningful through the RII0-ED3 transition, and in maintaining transparent governance during integration with ENW Ltd. The detailed observations below set out the Panel’s view against each of Ofgem’s assessment criteria; the Group will continue this scrutiny under the new arrangements from 2026/27.

### 1. Delivery of DSO benefits

SPEN DSO has made significant progress on a benefits framework that builds on prior government-funded work to define economic value from DSO activity. Emerging KPIs, including for socioeconomic outcomes, provide a firm basis to substantiate the value unlocked by DSO activity in its broad sense. SPEN DSO has substantiated a more than three-fold rise in benefits over the year.

The work on a benefits framework intersects with broader Ofgem and DNO efforts to articulate the societal value of distribution investment. The Panel encouraged SPEN DSO to express the value it has delivered in consumer- and public-facing language, with practical examples, and to work with local authorities and other groups even more closely to direct investment to areas of deprivation.

SPEN DSO has taken a leading role in the ENA Data & Digitalisation Steering Group (DDSG) on consistent quantification of benefits across DSOs. The Panel welcomed this. As the ED3 framework sets out the balance between ‘Flexibility First’ deferral and network resilience

and enabling investment, consistent and transparent benefit quantification will continue to be paramount. The Group will continue to encourage SPEN DSO to lead this work.

## **2. Data and information benefits**

The Panel has supported SPEN DSO's development of its data strategy, including its consideration of Open Data options, while reiterating the importance of security, resource triage and ISO standards for data management. Based on the information reviewed, the Panel considers that SPEN DSO is ahead of peers on data risk assessment and has encouraged it to maintain that position as DSO roles expand.

There has been restructuring and rationalisation with clearly defined roles and responsibilities within the team as needs evolve and to break down internal silos; the Panel now considers that the team has a clear and appropriate structure. There has been effective use of external suppliers, though the Panel suggested further scrutiny of the reports delivered and better alignment with SPEN's core requirements. SPEN DSO has used non-proprietary systems, including in building extensive databases and making them available to third parties. SPEN DSO is exploring alternative hosting arrangements and combinations with external exports or downloads to expand its data provision capacity, while preserving a single source of data, standard interfaces and a 'one stop shop' user experience. The Panel supports this approach.

In response to feedback regarding the website, SPEN DSO has taken action to improve usability and accessibility. It has designed and implemented new features including aids for API developers, and added the Recite Me accessibility tool, which allows users to customise their interface (including text-to-speech, colour adjustments and other accessibility aids). A SPEN DSO survey in November 2025 showed 85% of those who accessed the data would recommend it to other users, and shaped SPEN's further improvement plans.

SPEN DSO is assessing the most effective channels for understanding how stakeholder groups use the website, so that it can better highlight options for different users on how to use the available data, and present case studies to different user groups in the most effective and user-friendly way.

## **3. Flexibility market development**

The Panel observed strong stakeholder enthusiasm for SPEN DSO's flexibility agenda during the year. SPEN's September participants' meeting was oversubscribed. With encouragement from the Panel, SPEN DSO is following up engagement events with tailored messaging for different attendee groups.

SPEN DSO's flexibility datasets have gained traction, with growth in subscribers and users. Alongside Open Data Roadshows, SPEN DSO is exploring further routes to broaden engagement. The StormFlex tool has been expanded from one to four providers (20MW to

144MW) and provides a clear narrative on the practical benefits of flexibility approaches, notably during storm-related outage management.

In the Panel's view, SPEN DSO's position is that markets are built through sustained engagement with potential participants, not by opening a market and assuming participants will appear. The Panel supports this approach. SPEN DSO has shown a clear understanding that end-user organisations who have not historically been active energy users (community energy groups, transport authorities, local government) require tailored support to appropriately engage with the energy sector and participate in its new markets.

#### **4. Options assessment and conflicts of interest mitigation**

The Panel supported SPEN DSO's work to expand its Operating Framework, add a Code of Practice, and use more data and modelling to assess network and non-network solutions. There has been extensive work to make methodologies and processes transparent through the SPEN DSO website, including the Conflict of Interest management plan, which was developed following stakeholder engagement.

SPEN DSO's adoption of the Customer Load Active System Services (CLASS) dynamic voltage control approach, originated by ENW Ltd, demonstrates clearly the operational benefits available from DSO capability. It also reinforces the importance of maintaining a clear line of separation between DSO and DNO functions—a separation made more complex, and more important, by the ENW Ltd acquisition. The Group will be giving close attention in 2026/27 to how SPEN DSO's governance framework evolves to handle this complexity transparently.

#### **5. Distributed energy resources (DER) dispatch decision-making**

SPEN DSO has initiated extensive engagement with the Regional Energy Strategic Planning (RESP) process and with local authorities to build a more consistent view of distributed energy resources. It has also strengthened its links with the National Energy System Operator. Stakeholders include energy project developers, flexibility service providers, house builders and local authorities, although the Panel noted that achieving critical mass within each stakeholder group remains a challenge. SPEN DSO has succeeded in building and expanding close relationships with local authorities and is partnering with them to understand their needs. The Group supports further active outreach to these and other potential users, planned through an Open Data Roadshow, and supports an approach designed with notable user input to ensure it remains valid as user profiles change over time.

#### **Further reflections**

- **Outcome focus:** The Panel was pleased to see SPEN DSO's discussion increasingly framed in terms of outcomes for customers and society rather

than focusing on technical performance indicators alone. This is a meaningful shift from earlier years.

- Sector leadership: The Panel encouraged SPEN DSO to continue to take a leading role among DSOs where it can, as it has on the standardised benefits framework through the DDSG.
- Sustained engagement over market launch: In building markets such as flexibility, the Panel supported SPEN DSO's continued engagement with potential market participants rather than launching markets and assuming participants will follow. Tailored support for end-user organisations not historically active in energy markets is a particular strength that should continue and develop further.

### Respondent 8

This letter is a response to your call for evidence for the DSO Performance Panel 2025/26 on behalf of UK100.

This is the third year we have chosen to make a submission, and we thank Ofgem for offering stakeholders this opportunity to provide evidence.

UK100 is made up of 122 local and strategic authorities, and the create thriving places powered by clean energy – with fresh air to breathe, warm homes to live in, and a healthy natural environment.

As in previous years, we have worked closely with UK Power Networks DSO (UKPN DSO) between April 2025 and March 2026. Our partnership has strengthened, and we were proud to win Utility Week's first award for Strategic Partner of the Year in 2025 for this work.

UKPN DSO's leadership and the level of ambition they have for delivering for their local authority customers, and their targeted interest in engagement with local government, has only deepened this year.

Time and again we have seen this delivered through their dedicated Local Net Zero team, and operationalised in the innovative free tools they provide, the convening and events they organise, and through the joint projects we have delivered.

How they support local authorities with their net zero and energy ambitions, unlocking real benefits to support growth, decarbonisation and delivery, has been excellent. They have a positive feedback-led culture, responding to local authorities' asks around participation in flexibility markets, planning and delivery of electric vehicle charging, as well as supporting with the identification of benefits of climate action.

Building on our joint work from previous years, we have continued to promote our collaboration on practical resources, including our 2024 toolkit 'Navigating the Net Zero Transition'. Since it was published it has been supported by a series of dedicated and linked events and webinars, and remains one of the most popular materials accessed by local authorities through our Knowledge Hub.

During the 2025/26 period, UKPN DSO sponsored our 2025 report "Beyond Targets: The Wider Benefits of Climate Action" and the accompanying national conference. We also collaborated with their Local Net Zero team and Cenex on "Powering Local EV Infrastructure: A Guide for Councils", to help local actors plan and deliver electric vehicle charging to drive carbon abatement and bring economic value. The guide was launched at Transport & Energy's Conference and promoted across our events. Towards the end of 2025, we also worked together to develop "Unlocking Flexibility: A Guide for Local Authorities", offering clear steps to participate in flexibility markets and unlock investment. We are now actively developing a fourth guide on Community Energy supported by UKPN DSO.

We value our work with DSOs and their commitment to working with us and local government. It has been invaluable to supporting our members to access the right advice and tools to support their energy leadership and net zero journey. We appreciate the investment they make in the teams and projects highlighted here, and we hope this is valued in both RIIO-ED2 reporting and the development of RIIO-ED3.

Thank you again for the opportunity to be part of this process. We are happy for this submission to be published.

## Respondent 9

I am writing to provide my feedback on behalf of Cadent in response to the call for evidence on Distribution System Operator (DSO) performance in 2025/26.

Feedback over the last 12 months based on panel criteria:

Criteria - 'that the distribution network company is taking a proactive role on regional cross vector investment planning and interfacing with local actors (e.g., LA and GDNs)':

Cadent have been working closely with UK Power Networks' DSO since April 2023 as part of the Energy Networks Association where the Head of Local Net Zero at the DSO, Lynne McDonald, and Net Zero Associate, Venus Tam, led the collaboration between electricity and gas networks in delivering the "Collaborating for local net zero planning and delivery (Dec 2023) – Energy Networks Association (ENA)".

In 2024, we continued with our collaboration and culminated to the development of a standardised data template, the Local Authority Common Ask, developed alongside SGN, which expanded on UK Power Networks' DSO Data Dictionary. The Local Authority Common Ask has enabled local authorities developing LAEPs to share outputs and data that can be used both by electricity and gas distribution networks for network planning in one go. Over last year, the Local Authority Common Ask has been used by the Greater London Authority to share outputs for the Outer East Subregional Phase 1 LAEP covering Bromley, Bexley, Havering, Redbridge, and Barking & Dagenham as well as by London Borough of Hounslow for their Phase 2 LAEP output.

We really appreciate the idea of Local Authority Common Ask and have facilitated SP ENW to be part of it, expanding its coverage and benefiting more of our customers, in addition to those who are supplied by SSEN and NGED which are neighbouring networks with UK Power Networks.

Lynne and Venus' customer-centric approach has helped foster closer collaboration and alignment between our organisations and local authorities.

I welcome the DSO Performance Panel considering this evidence as part of your 2025/6 assessment.

Thank you for considering my feedback. Please reach out directly if you require any further information.

## Respondent 10

I am writing to share my feedback as a customer on UK Power Networks' DSO performance for 2025/26 in response to the DSO Performance Panel assessment criteria.

### **Delivery of DSO benefits**

Criteria addressed: 'Consideration of the impact of DSO activities on different types of consumers, network users and the wider energy system (including carbon emissions)' and 'that the distribution network company is taking a proactive role on regional cross vector investment planning and interfacing with local actors (e.g., LA and GDNs)'.

UK Power Networks supported Freeport East to plan for 500MW of additional capacity that is arising as a result of our Industrial Strategy Zone status and the range of future investors and developers we are engaged with. Our own objective is to drive local, regional and national economic growth and therefore we rely on UKPN and other industry partners to support us as we work to deliver Government's ambitions in their Growth Mission and Industrial Strategy which forms part of our own mandate.

As a result of this engagement, we were able to clarify our requirement and successfully communicate this to the RESP who have incorporated it into the tRESP.

We have since used this as a case study with other Freeports and Government to illustrate how the priority needs of Industrial Strategy Zones around the United Kingdom could be best supported by the energy sector in our respective regions.

This was highlighted again this week in a meeting between UK Freeports and Minister for Investment, Lord Stockwood.

In addition, the Government has recently launched its Connections Accelerator Service. I was delighted that one of our strategic projects, a 40MVA connection at Felixstowe Port, was selected as one of the strategic demand sites, which also reflects the prior and ongoing support we had from UKPN. This is a positive outcome for us as we had initially expected a connection date in the mid-2030s. I appreciate the team's work so far and look forward to continuing to collaborate to accelerate the connection date and utilising innovative connections products developed by the DSO to maximise our available capacity in the meantime.

Thank you for taking my feedback into consideration as part of your 2025/26 assessment and hope that you recognise UK Power Networks DSO's efforts in coordinating and supporting customers. Please do not hesitate to reach out if you have any questions or require further clarification.

### Respondent 11

The below is written feedback from myself, representing OnPath Energy, in response to the CFI – DSO Performance Panel 2025/26, with regards to Northern Powergrid DSO data and information.

As an onshore renewable energy developer, we originate new renewable generation projects from initial ideation through development, construction, and operation.

Our grid engineers, utilise the API function built into Northern Powergrid’s open data portal to automate grid capacity assessments for new prospects in this region, this amounts to significant time savings for our technical team by automating repeatable data extraction tasks and enables repeatable tasks, this makes exploring multiple options for points of connection in the network very easy and takes very little time, which allows our engineers to have more informed conversations with EHV design team at Northern Powergrid when discussing new connection. Automating this process ensures consistent accuracy of reports by utilising the latest data; key datasets for this exercise are Embedded Capacity Register (ECR) and network technical data, such as network demand, transformer capacities, and circuit capacities.

Using the API function allows data to be updated directly within a Microsoft Excel sheet or Microsoft PowerBI dashboard automatically and keeps the data operations the same, meaning a new report of network capacity can be compiled almost instantaneously with the most up to date data. This is particularly relevant for datasets which are updated on a monthly basis, such as the ECR, which has been particularly useful to analyse the potential impacts of connections reform of the generation contracted to connect to the network at any given point.

Northern Powergrid publish a national ECR dataset which is particularly useful to align the ECR data between the whole UK licence areas and saves a significant amount of time where compilation issues are caused by varying standard formatting between DNOs. As this data also contains geospatial data, transforming this data in Microsoft PowerBI allows easy modelling national trends for new applications, or identifying areas which may be subject to attrition to identify potential areas of unutilised capacity, which may help to inform development strategy or highlight areas for focus. We are not aware of any other DSO which publishes data on a national scale like the ECR, we see this as an example of Northern Powergrid’s data provision exceeding requirements and providing real value to its users.

Additionally, we find Northern Powergrid's own Feature Pages a particularly useful tool for presenting key technical project constraints to non-technical audiences, displaying key technical constraints in this way ensures this data is accessible to a wider audience.

### Respondent 12

I am writing to provide my feedback as a stakeholder form of evidence in support of the call for evidence on Distribution System Operator (DSO) performance in 2025/26 based on the DSO Performance Panel assessment criteria:

Delivery of DSO Benefits: Criteria evidence 'that the distribution network company is taking a proactive role on regional cross vector investment planning and interfacing with local actors (e.g., LA and GDNs)':

We recently announced a Wales-wide initiative to support the rollout of electric vehicle charging infrastructure by providing all 22 Local Authorities with free access to a shared national data platform, ChargePoint Navigator. This marks the first time the platform has operated at a National level outside England. We understand that this platform was originally funded and co-developed by UK Power Networks DSO and welcome the proactive role taken by them to provide a digital planning tool to local authorities looking to roll out electric vehicle infrastructure. UK Power Networks have also been helpful to us in sharing their experiences and learnings from operating ChargePoint Navigator since 2024, and we expect to benefit from this early leadership they have taken.

We would welcome this evidence being considered as part of Ofgem's 2025/26 panel assessment.

### Respondent 11

I am writing on behalf of Arup to provide stakeholder feedback as evidence in response to your call for input on Distribution System Operator (DSO) performance for the period covering April 1st, 2025 until March 31st, 2026.

As a collaborator and customer of UK Power Networks' DSO, I have experience in the offerings the DSO have introduced both to Local Area Energy Planning (LAEP) practitioners like me and to local authority customers.

Based on the DSO Performance Panel assessment criteria:

#### (A) Delivery of DSO benefits

That the distribution network company is taking a proactive role on regional cross vector investment planning and interfacing with local actors (e.g., local authorities and gas

distribution networks): UK Power Networks' DSO Local Net Zero team have been fantastic at supporting us with data requests and developing standardised ways of sharing data. The team consistently provide support and request feedback during our monthly catch-up calls with the Head of Local Net Zero, Lynne, and our Account Manager, Venus, as well as in-person practitioner forums to improve their services and value to customers.

We have been working with the Local Net Zero team to support LAEP outputs to inform network investment plans of various energy vectors and expanded the inclusion of local data from low carbon technologies to housing development data from local plans in UK Power Networks' Distribution Future Energy Scenarios (DFES). To develop the method for this expansion, the Local Net Zero team consulted with us extensively to understand local housing data and test processes and assumptions. As for informing cross energy vector network investment planning, we supported the development of the Local Authority Common Ask template which enabled us to translate the Greater London Authority's Outer East Subregional Phase 1 LAEP and London Borough of Hounslow Phase 2 LAEP outputs not only with UK Power Networks' DSO but also with the gas distribution network operators delivering gas for this area. We are aware, through our work on Oxfordshire County Council's LAEP, that the Local Authority Common Ask has been further adjusted to enable sharing not simply with UK Power Networks' DSO but also with the other DSOs that serve Oxfordshire—a proactive and collaborative step taken to ensure cross vector and cross regional investment planning.

#### **(B) Options assessment and conflicts of interest mitigation**

The network options assessment has demonstrated how wider whole system options have been assessed to deliver identified needs at lowest cost: Our monthly engagement with our Account Manager has provided reassurance regarding the robustness of the network planning process, including the effective integration of energy plans and housing data to enhance UK Power Networks' DFES. For the second year in succession, we shared LAEP outputs, and this year did so by using the Local Authority Common Ask template that included data shared with the gas distribution networks to support both UK Power Networks' consideration within the network options assessment and the GDNs' planning. The DSO's Local Net Zero team has enabled this effectively through proactive and sustained engagement with us in a dual customer-collaborator role.

I urge the DSO Performance Panel to consider this letter as evidence for the 2025/26 assessment and recognise UK Power Networks' DSO's great customer service and the value they bring to their customers.

### Respondent 13

I'm writing to submit stakeholder feedback as part of Ofgem's call for evidence on Distribution System Operator (DSO) performance in 2025/26. Our county is served by three distribution network operator companies, and we engage with all three. My comments below focus on UK Power Networks' contribution, particularly in the context of our wider, coordinated approach across the three networks.

Being a local authority customer of UK Power Networks' DSO, the following feedback outlines my experience based on the assessment criteria:

'That the distribution network company is taking a proactive role on regional cross vector investment planning and interfacing with local actors (e.g., LA and GDNs)' and 'The network options assessment has demonstrated how wider whole system options have been assessed to deliver identified needs at lowest cost'

As part of our Local Area Energy Planning (LAEP) governance, we run both a Strategic Board (steering) and an officer-level Working Group, which meet regularly throughout the year. UK Power Networks attends and contributes to both, which has helped ensure their input is joined up across strategy and delivery. These forums aren't just a channel for updates and questions. UK Power Networks has actively shaped our thinking, including strategic input on priorities, sequencing, and how we engage local partners to deliver credible, investable plans. They have also helped us think through how our LAEP work aligns with wider regional planning and engagement expectations, including our approach to being RESP ready, and how these different programmes fit together coherently.

The UK Power Networks team consistently offer practical support and timely answers through our monthly catchups with our account manager, as well as in-person forums. As a county served by three DSOs, we need to be able to input into each DSO's planning and evidence processes, but doing this separately, in different formats and on different timelines, has been challenging and resource intensive. We have therefore particularly welcomed UK Power Networks taking a lead role in coordinating a more consistent approach across the three DSOs. The Local Authority Common Ask template is a strong step forward: it will enable us to share our LAEP outputs with UK Power Networks, SSEN and NGED in one go, reducing duplication and making it easier for us to provide comparable, usable evidence. This is still a work in progress as work is underway to move towards a coordinated digital capturing process through the LAEP+ tool, but we're already seeing the benefits of this more collaborative way of working.

Overall, our engagement with UK Power Networks has strengthened our confidence in how LAEP outputs are being incorporated into planning and investment decisions. Their transparency—particularly through the published LAEP Support Framework—gives us

assurance on how outputs are checked and used. We welcome the continued development of the LAEP+ tool and look forward to working with UK Power Networks (and the other DSOs) to translate LAEP evidence into coordinated network investment.

Thank you for considering my feedback as part of the 2025/26 Performance Panel assessment.

### Respondent 14

Please find below Blake Clough Consulting's submission to the DSO Performance Panel 2025/26 Call for Input. This is intended to be used as evidence for a high score on "Criterion 2: Data and information provision" for Northern Powergrid. There is no need for the response to be kept confidential.

NPg is leading the sector in scope, granularity, and accuracy of grid connections data in this critical period of connections reform. The reforms are primarily targeted at removing uncertainty from the connections queue, both for network planners and grid users seeking to connect in a timely fashion. NPg has enabled this core goal of the reforms by (1) publishing the sector's first Gate 2 queue for embedded generation connections, (2) publishing one of the only public registers for demand connections, (3) maintaining high quality publications of the Embedded Capacity Register, Network Development Plan, and Appendix G data.

NPg has been very proactive in seeking feedback from us and other stakeholders and has been notably responsive in acting on it. NPg has clearly identified the most critical grid connections data required by its customers and has provided it in a manner accessible to a wide range of its stakeholders. The data is available in summary tables and easily digestible graphics, in common data formats, and accessible via a consistent and standard API.

At Blake Clough Consulting, we have been strongly focused on advisory work around connections reform generally and the Gate 2 To Whole Queue (G2TWQ) process in particular. To model the G2TWQ process across Great Britain, we have built extensive automated pipelines ingesting public and private datasets. These form the basis of our G2TWQ advisory work, through which we have reviewed over a hundred contracted connections across transmission and distribution for risk in the G2TWQ process. Because some Gate 2 queues are consolidated across transmission and distribution, NPg's high quality data provided at distribution also affords a better understanding of the transmission queue.

Critically, as the licenced distribution network operator, NPg is uniquely able to share accurate and up-to-date grid connections and network data. The scope, granularity, and accuracy of the publications mentioned above have fed directly into improving the precision

and accuracy of our grid connections modelling pipeline. This has, in turn, enabled us to provide timely insights to developers ahead of investment decisions required by the accelerated path to Clean Power 2030.

### Respondent 15

I am writing on behalf of Burneside Community Energy in support of SP Electricity North West (SP ENW) in response to Ofgem's call for input on DSO performance. I would like to provide stakeholder evidence relating to SP ENW's approach to delivering social and community-level benefits through its DSO activities.

Burneside Community Energy has worked with SP ENW over a number of years, including receiving early-stage support through the Powering our Communities Fund and more recently engaging with the Social DSO Fund. Throughout this relationship, SP ENW has demonstrated a clear commitment to enabling community-led energy initiatives and ensuring that the benefits of the energy transition are accessible at a local level.

From our perspective, one of the most distinctive aspects of SP ENW's approach is the way in which funding, engagement and decision-making are integrated. The Social DSO Fund is not simply a grant mechanism; it is supported by clear guidance, transparent assessment criteria and ongoing engagement to help community organisations develop credible, investable projects. This has enabled groups like ours – who do not have the scale or resources of commercial market participants – to meaningfully participate in the energy transition.

Our current project at the Bryce Institute Village Hall illustrates this. The scheme combines solar PV, battery storage and, in a later phase, low-carbon heating, with the aim of reducing energy costs, improving resilience and supporting local net zero ambitions. While modest in scale compared to network-level interventions, the relative impact on our community is significant. Burneside has a population of approximately 1,800 people, and projects of this nature directly affect a large proportion of local residents through reduced costs, improved facilities and wider community benefits.

A particularly strong feature of SP ENW's approach is its use of 'social cost benefit analysis' to inform investment decisions. As part of our engagement, SP ENW demonstrated how this tool had been applied to our project. They were able to show that, for every £1 invested, the return to Burneside Community Energy and the wider Burneside community is likely to be £3.34. This level of quantification is highly valuable: it provides a robust and transparent basis for decision-making, while also capturing social value that would otherwise be overlooked. It also gives community organisations greater confidence in developing projects, as the expected benefits are clearly articulated and evidenced.

Through engagement with the Social CBA methodology, we have developed a stronger understanding of how to measure and evidence project impacts, and we have adapted our own processes to better track outputs and outcomes. This reflects a broader role for SP ENW not just as a funder, but as an enabler of more sophisticated and effective community participation.

From a system perspective, this approach contributes to:

- More inclusive participation in the energy system, particularly in rural and community settings that are often underserved.
- Better alignment of investment with local needs, including areas with higher levels of fuel poverty.
- Wider societal benefits, including reduced carbon emissions, improved energy resilience and lower costs for community groups.

Importantly, while the absolute scale of these projects may be small in smaller or rural communities such as Burnside, targeted interventions can deliver meaningful benefits across a large share of the population.

In our view, SP ENW's approach demonstrates a clear commitment to going beyond business-as-usual. By embedding social value within its decision-making processes, proactively supporting community-led projects, and building stakeholder capability, it is delivering outcomes that align strongly with the objectives of the DSO incentive.

We believe this represents good practice that could be adopted more widely across Great Britain, particularly in ensuring that the transition to a smarter, more flexible energy system delivers benefits for all communities.

## Respondent 16

I am writing to provide my stakeholder feedback as evidence for the call for evidence on Distribution System Operator (DSO) performance in 2025/26.

As a customer of UK Power Networks' DSO, I have first-hand experience of the customer services and offerings the DSO has introduced and the major shift in the engagement and service we have received from the team. I would like to share my customer experience and feedback on UK Power Networks' DSO performance from April 2025 to March 2026, based on the following two DSO Performance Panel assessment criteria.

- **1. DSO Performance Panel assessment criteria – Delivery of DSO Benefits:** Consideration of the impact of DSO activities on different types of consumers, network users and the wider energy system (including carbon

emissions) and that the distribution network company is taking a proactive role on regional cross vector investment planning and interfacing with local actors (e.g., local authorities and gas distribution networks). The DSO Local Net Zero team have been proactive in their engagement with and support for us, and other NHS trusts, with the delivery of rooftop solar photovoltaics (PV). Having received GB Energy funding to install rooftop solar PV on our buildings, we were able to receive guidance on solar project delivery and the connections process through our attendance at the webinar hosted jointly by UK Power Networks with NHS England and the Greater Southeast Net Zero Hub in November 2025 and one-to-one engagement with the Local Net Zero team. Furthermore, the development of Opportunity Finder, a tool being developed for our specific use cases by UK Power Networks DSO, will help us maximise the delivery of solar PV with the funding we have available in a streamlined process. We are shaping requirements and functionality as part of a pilot group wherein we participate in prototype-testing and feedback-sharing. By doing so, we hope Opportunity Finder will help us save time and money in solar PV roll-out in future projects.

- **2. DSO Performance Panel assessment criteria – Data and information benefits:** The distribution network company is leading the sector in promoting planning, operations and market data availability and the distribution network company is sharing underlying methodologies and other insights beyond output data. Data for our specific use case are made available to us through Opportunity Finder. The prototype features building, network, cost and solar rooftop PV suitability datasets that can help us optimise our GB Energy funding to install solar rooftop PV efficiently across our buildings. The tool is intuitive and accessible by design and facilitates self-service during pre-connection application phase of project initiation.

I welcome the DSO Performance Panel considering this evidence as part of your 2025/26 assessment and recognise the DSO's efforts in delivering exceptional customer service and value to its customers.

### Respondent 17

I am writing on behalf of the NL Flex consortium, a collaboration of Dutch electricity network companies and energy retailers working to accelerate the adoption of consumer-led flexibility in the Netherlands. In the context of growing constraint issues in the Netherlands, we plan to launch a flexibility tender in September 2026, informed heavily by the approach to local flexibility we observe in the UK.

From our perspective as international peers, UK Power Networks stands out as setting an industry-leading benchmark in the design and operation of distribution-level flexibility markets. In particular, we have observed a consistently high standard in the development of flexibility products, contracting approaches and operational processes that balance system needs with accessibility for market participants. The clarity and maturity of these arrangements have provided a valuable reference point for the Netherlands in seeking to scale consumer and aggregator participation in local flexibility services.

We also wish to highlight UK Power Networks' commitment to openness and learning across the sector. Through structured engagement with regulators, market participants and international counterparts, the company has actively created opportunities to both share insights and learn from others. This approach is supporting continuous improvement across the wider distribution and flexibility ecosystem, including our own work in the Netherlands.

In our experience, this combination of robust market design and proactive knowledge-sharing is critical to building trust, reducing barriers to entry, and enabling flexibility to deliver meaningful consumer and system benefits at scale. We therefore welcome the leadership shown by UK Power Networks in this area and consider it a strong example of effective DSO practice.

We hope these observations are helpful to the Panel in its assessment of DSO performance and would be pleased to engage further should additional international perspective be of value.

### Respondent 18

Octopus Energy is the largest supplier of electricity in GB, a leading flexibility provider, installer of low-carbon technologies (LCTs), and investor in renewable energy projects. Building on our proven track record, Octopus has recently expanded into the C&I space to deliver novel energy solutions for energy-intensive users, including data centres.

Thank you for the opportunity to feed into the DSO Performance Panel assessment. The DSO incentive is crucial to the continued development, iteration and innovation across flexibility

markets and services, data and digitalisation, dispatch and conflicts. Flexibility will continue to be critical for reducing costs, accelerating connections, and improving network management, such as optimising load, utilisation, voltage, and losses, as well as the timing and reinforcement of the network. We are now in a critical period in the run-up to ED3, where scale, ambition and development must continue at pace.

Octopus participates in all DSO flex markets, managing ~2GW of consumer flexibility, and we work alongside many DSOs on new, innovative approaches. This means we recognise the importance of DSOs and have a first-hand view of how they are performing in the current system. Below highlights some key areas of consideration for each DSO and their performance.

### **1. Flexibility market development: improvement to BAU services**

**Demand turn-up services:** Demand turn-up is an ambitious, innovative approach that helps customers make the most of cheap electricity and locally reduces the need for curtailment of wind and solar. DNOs such as UKPN and NPG continue to trial and use demand turn-up, and it was positive to see further developments such as:

- SPEN has just completed a successful demand turn-up trial and is assessing its inclusion in its BAU tenders going forward, depending on the results. We welcome this step forward.
- NGED is now offering day-ahead flex (launched this March), which includes a demand turn-up service that enables us to offer power ups in their region.

**Day-ahead flex services:** It is positive to see wider use of day-ahead markets, including NGED, which launched its day-ahead service this March.

### **Stakeholder engagement on flexibility market access and design:**

- NGED: This year, we have been impressed with NGED's stakeholder engagement (quarterly flex forums are well-run with useful agendas and adequate time for discussion of progress, feedback and future-looking aspects on their roadmap).
- UKPN: It has been useful to engage with UKPN on BAU flexibility market issues and proactively discuss future developments across DSO markets, accelerated connections using flex and wider innovative solutions.
- Duplicate MPANs: Both UKPN and NGED have been open to working with us and other FSPs to come up with a better solution to the duplicate MPAN issue, which centres on customer consent and choice.

**Improvement/ease of participation:** NGED has taken on feedback to improve data visibility for flexibility service delivery performance and payments, and has significantly improved the data available via API and the UI in Flexible Power. UKPN: We welcome the streamlining of pre-delivery processes, which has enabled UKPN to reduce the time it takes to verify an asset and assign it to a zone. SSEN: Welcome the streamlining of delivery.

## **2. Level of ambition and flexibility market development: proactive development of new, innovative services**

**Dynamic overlay tariffs** are a critical feature of future system operation to prevent herding in response to wholesale market signals, causing issues on distribution grids. These implicit signals that reflect temporal and locational constraints on the network will be a key tool during ED3 and beyond. It has been excellent to progress and trial this concept further with NPG and SSEN, adding to previous trials with UKPN.

**New services/models:** Costs for technologies such as batteries and solar panels are rapidly falling and could profoundly change what grid infrastructure is required. It has been excellent working with UKPN on exploring the uptake of batteries in a congested area to test speed, customer uptake, and new models/services. Similarly, UKPN has been proactive in exploring new models for accelerating connections and voltage management.

## **3. Improved data and digitalisation**

- **NGED network data accessibility:** excellent to see new partnerships improving accessibility of electricity network data. The collaboration introduces Squid's CIM Explorer, a platform that converts NGED's technical network model into a visual, interactive interface. The tool enables users without specialist grid modelling expertise to explore network information in a clear and navigable way.
- **UKPN:** provide open data on transformer load, which is very helpful for understanding the availability and sizing of potential new projects. It is great to see the new open source Python package as well, named "UKPYN".