

DNO Low Carbon Technology (LCT) - Energy Efficiency role in ED3

AgilityEco Services Ltd Consultation Response – 1st April 2026

About AgilityEco

AgilityEco is a UK-based delivery, advice and programme management organisation operating across energy efficiency, affordable warmth and home decarbonisation.

We work with network companies, local authorities, housing providers, community organisations and other partners to design and deliver large-scale programmes that support households, particularly low-income and vulnerable households, to reduce energy costs, improve the energy performance of their homes and transition to lower-carbon living.

Our perspective is grounded in practical delivery. We operate at the point where policy, funding and system design translate into real outcomes for households and communities. That includes our flagship energy advice and assistance scheme **LEAP**, which supports vulnerable households with tailored energy advice, onward referrals and access to practical assistance, and **Connected for Warmth** which demonstrates how targeted insulation and advice interventions can be deployed in partnership with electricity networks to deliver both consumer and network benefits.

We're very proud of our efforts to tackle fuel poverty and improve energy efficiency for households across Britain. The delivery of our impact during 2024-25 includes:

- Supported **45,410 vulnerable households**
- Delivered **197,395 energy efficiency measures**
- Delivered **£143 million in lifetime bill savings**
- Abated **446,015 tonnes of lifetime CO₂**

Further detail is available in our **AgilityEco Impact Report**.

Our combination of consumer insight, place-based delivery experience, low-income household support and system-level understanding places us in a strong position to respond to this consultation.

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Executive summary

We strongly support Ofgem's decision to open this discussion now. In our view, this consultation is a pivotal moment in determining whether electrification of heat and wider LCT rollout is delivered in a way that is efficient, equitable and at the lowest cost to consumers.

Our central position is that DNOs should be empowered, and expected, to play a leading role in coordinating and (where appropriate) funding the deployment of LCTs and enabling measures in targeted geographies where this represents a lower-cost alternative to conventional network reinforcement.

In practical terms, we believe DNOs should:

- Coordinate local capital deployment across network investment, public retrofit funding, local authority and housing investment, and relevant private finance
- Identify the geographies where household interventions can deliver the greatest network and system value
- Work alongside organisations already delivering locally, rather than attempting to create parallel delivery structures
- Fund or co-fund interventions behind the meter where this reduces or defers reinforcement costs
- Ensure low-income households are explicitly included where they overlap with network and system priorities

This reflects a simple but important shift in thinking. **Energy efficiency and electrification readiness are now infrastructure issues, not just affordability issues.**

The thermal performance of homes, the suitability of properties for heat pumps, the extent to which peak demand can be shifted or reduced, and the affordability of adoption – all directly affect the level of network investment consumers ultimately pay for through bills.

If DNOs recover investment through consumer bills, they are effectively deploying public funds. In our view, that creates a clear responsibility to ensure that funding is directed to the right places and used in the most efficient way.

Without this evolution in role, there is a material risk that:

- Reinforcement is overused as the default solution where lower-cost alternatives exist
- The rollout of LCTs becomes slower and more fragmented than necessary
- Low-income households are left behind while better-off households capture a disproportionate share of the early benefits of electrification and flexibility

We also consider it critical that any expanded DNO role is designed with clear guardrails to avoid market distortion and ensure equitable outcomes. In particular, there is a risk that activity could naturally gravitate towards the most commercially straightforward opportunities, such as

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higher-income households adopting EVs or heat pumps, rather than those where intervention is most needed.

Ofgem should therefore embed equity as a core objective of ED3, ensuring that low-income and vulnerable households are not only considered, but actively prioritised. This should be supported by clear expectations on targeting, delivery metrics and transparency of outcomes

For those reasons, we support both the proposed Enhanced Co-ordination role and a meaningful Expanded Role for DNOs in funding and facilitating targeted deployment.



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Consultation responses

Q1. Should DNOs play a role in co-ordinating and supporting a cost-effective energy transition through improved planning and supporting/directing targeted delivery? How can they help make the transition more efficient and affordable for everyone, and do they have a role in supporting lower-income households?

Yes. We believe DNOs should play a role, and that role should extend beyond passive co-ordination into active orchestration of how capital is deployed locally.

Our proposed model is that DNOs should act as local system coordinators of capital deployment. In other words, DNOs should work alongside organisations already deploying capital into homes – whether through government grant programmes, local authority-led retrofit, social housing investment or other forms of finance – and help ensure that this capital is directed towards the places where it can deliver both household benefit and network value.

This approach would allow DNOs to align:

- Network investment
- Public retrofit funding, including Warm Homes Plan delivery routes
- Local authority and combined authority programmes
- Social housing investment plans
- Relevant private finance solutions where appropriate

We see three reasons why this is the right model.

1. DNOs are uniquely placed to identify where intervention can deliver the greatest network benefit. They understand local constraints, likely demand growth and where electrification pressures are emerging.
2. A great deal of capital is already being deployed into homes, but it is not being sufficiently optimised against network need. Existing schemes and investment decisions are often driven by tenure, programme boundaries, institutional priorities or funding criteria, rather than by a robust view of where interventions can most cost-effectively reduce system stress.
3. Because network investment is recovered through consumer bills, DNOs are already deploying public funds. They therefore have a responsibility to take a leading role in ensuring that those funds are spent in a way that minimises total system cost and supports fair outcomes.

We also believe DNOs do have a role in supporting lower-income households, and that this should be an explicit part of policy design, rather than an optional add-on. This is not only a social argument. It is also a system-efficiency argument. Lower-income households are typically less able to adopt LCTs without support, yet excluding them makes the transition less efficient overall. If only more affluent households electrify early, the system risks becoming more unequal and more expensive, while large parts of the housing stock remain inefficient and harder to decarbonise later.

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In our view, the most effective model is therefore one in which DNOs:

- Identify priority geographies based on network need and likely system value
- Work with experienced delivery partners, local authorities, housing providers and community organisations to identify suitable households and properties
- Where justified, fund or co-fund interventions that are cheaper than conventional reinforcement
- Take a formal role in coordinating local capital deployment across network investment and place-based retrofit funding, ensuring alignment with areas of network constraint and system value

Q2. Do you agree with the overall rationale and scope of ‘Enhanced Co-ordination’?

Yes. We support the overall rationale and scope of Enhanced Co-ordination and consider it a necessary baseline for ED3.

The transition to electrified homes is increasingly constrained by fragmentation between network planning, local delivery, public funding, local housing strategy and consumer engagement. Enhanced Co-ordination is therefore important not simply as a stakeholder engagement exercise, but as a practical mechanism for improving targeting, sequencing and place-based delivery.

In our view, Enhanced Co-ordination should not be limited to better conversations between organisations. It should result in practical outputs that change how the market behaves. Those outputs should include:

- Better alignment between network planning and local housing decarbonisation activity
- Clearer identification of priority geographies where network constraints, electrification potential and housing need intersect
- Improved visibility of where network-enabling works and building upgrades should be sequenced together
- More consistent and decision-useful local intelligence feeding into wider regional planning
- A more investable and predictable environment for delivery partners and supply chains

We would encourage Ofgem to frame Enhanced Co-ordination as an operational function, not merely a governance or reporting requirement. Done well, it should help local actors answer practical questions such as:

- Where can electrification proceed readily?
- Where are enabling works likely to be required?
- Where would fabric improvement materially reduce system cost?
- How should limited public and private capital be prioritised spatially?
- How can low-income households be included in a way that also supports network objectives?

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A key success test for Enhanced Co-ordination should therefore be whether it leads to more efficient sequencing of interventions and clearer delivery pathways, not simply whether stakeholder engagement has increased.

Q3. What are your views of the effectiveness of the existing Collaboration Plan requirements? Do you think the enhanced Community Collaboration Plans we have described would be helpful to stakeholders and, if so, how best should they be monitored?

The existing Collaboration Plan requirements have been useful in principle, but in practice we consider them too variable and too process-led to deliver the degree of co-ordination that the next phase of electrification will require.

Enhanced Community Collaboration Plans would be valuable if they evolve into practical, place-based planning tools rather than remaining largely descriptive documents. To achieve that, they should become:

- More place-specific and transparent about geographic priorities
- More explicit about the relationship between network issues and local delivery activity
- Most importantly, more outcome-focused

In our view the plans should, at a minimum, set out:

- Where the DNO expects likely concentrations of future demand growth
- Which local stakeholders it is prioritising and why
- Where network constraints or reinforcement pressures are likely to emerge
- How the DNO intends to interact with local authority retrofit plans, social housing investment, heat network zoning and wider local decarbonisation planning
- How low-income and vulnerable households will be reflected in local targeting and engagement
- How the collaboration is expected to lead to more efficient deployment, not simply better communication

Importantly, these plans should not just list meetings, stakeholder groups or engagement channels. They should articulate a delivery logic. For example, if a DNO identifies a geography with rising heat pump adoption pressure, constrained local assets and significant volumes of low-income owner-occupiers or social housing stock, the plan should explain what collaboration is expected to happen in that area, with whom, and to what end.

Monitoring should not rely only on whether a plan has been published. Ofgem should establish minimum standards and require evidence that collaboration is informing real delivery decisions. Monitoring could include:

- Stakeholder feedback from local authorities, social landlords and delivery organisations
- Evidence of data sharing and joint planning
- Evidence of targeted delivery, enabling works or pilot activity arising from collaboration
- Evidence that local insight has informed network planning assumptions

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- Annual updates showing how local engagement has affected network or delivery choices

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Q4. How useful is the data currently published by DNOs, and is it presented adequately?

Current DNO data is useful in principle, but often of limited value in practice for those trying to design or deliver place-based decarbonisation programmes.

The challenges are not only about whether data exists, but whether it is accessible, intelligible and operationally useful for non-network actors. At present, several issues limit its usefulness:

- Inconsistency across DNOs
- Technical presentation that is difficult for non-specialists to interpret
- Insufficient granularity for programme design
- Limited interoperability
- Weak connection to the housing, tenure and socio-economic data needed to translate network information into delivery decisions

For local authorities, social landlords, installers, programme managers and community-facing organisations, the key question is not just where there is capacity, but what that means in practice for sequencing, targeting and delivery. A technically accurate map or dataset is not enough if it does not support practical decision-making.

We therefore support stronger requirements around consistency, visualisation, machine readability and practical usability. Data should help external stakeholders understand:

- Where there is likely to be spare capacity
- Where constraints are emerging
- What types of enabling works may be required
- Where electrification is likely to be easier or harder
- How network conditions intersect with housing stock and likely delivery pipelines

We would also encourage Ofgem to require DNOs to think about user segmentation. Data products that may be suitable for market analysts or flexibility providers are not necessarily suitable for local authorities or delivery organisations. Different users will need different levels of interpretation and presentation.

Q5. What are your views on strengthening the System Visualisation Interface requirement, and would it be valuable for DNOs to collate and publish additional non-network datasets, if so, which datasets would be most beneficial?

We support strengthening the System Visualisation Interface (SVI) requirement. This is one of the most practically important parts of the consultation, if Ofgem wants local actors to translate network information into delivery activity.

In our view, the SVI should evolve from a technical network-data portal into a genuinely useful planning and delivery tool.

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Yes, it would be valuable for DNOs to collate and publish additional non-network datasets, where doing so helps local actors make better decisions. Particularly useful datasets would include:

- Tenure and housing stock typologies
- EPC data and proxy indicators of retrofit readiness
- Indices of deprivation and fuel poverty indicators
- Social housing concentrations
- Local authority and social housing decarbonisation activity
- Heat network zoning and local heat-planning data
- Existing penetration of low carbon technologies where available
- Known or anticipated demand drivers such as EV uptake hotspots

We recognise that DNOs will not own all of this information. However, they are well placed to curate and present datasets in a combined way that supports better place-based planning. The objective should not be perfect data architecture at the outset; it should be a practical interface that enables more efficient decisions.

More specifically, a strengthened SVI should help users move from abstract information to actionable insight. For example, it should be possible for a local authority or delivery partner to identify an area that is:

- Likely to see rising electrification demand
- Served by assets under pressure
- Dominated by housing types suitable or unsuitable for immediate heat pump rollout
- Home to concentrations of low-income households that may require grant support or assisted customer journeys

That would materially improve local planning and would support a much more rational deployment of both public and regulated capital.

Q6. What are your views on the Working with Local Authorities and others proposals we have set out above? What if any, would be the key elements of this? Are you aware of particular entities who would benefit from such advice?

We strongly support these proposals. Local authorities and other place-based actors are central to delivery, but many do not have access to the network insight or technical support needed to translate decarbonisation ambition into realistic local programmes. That applies equally to many social landlords, combined authorities and community-facing delivery bodies.

The most useful forms of DNO support would include:

- Area-specific advice on network constraints and likely timings
- Clear guidance on where electrification can proceed more readily and where enabling works may be required
- Tools for overlaying network conditions with local housing and programme data
- Support to test different local delivery scenarios and their network implications

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- Structured local engagement forums with practical outputs
- Guidance that helps local organisations design more realistic and better-sequenced programmes

The key principle should be that DNOs help local actors make better decisions without requiring them to become network specialists.

In practice, entities that would particularly benefit include:

- Local authorities and combined authorities
- Social housing providers and ALMOs
- Delivery partners operating on behalf of public bodies
- Community energy organisations
- Any future Warm Homes Agency-type coordinating functions
- Organisations involved in heat network planning and local area decarbonisation

We would also note that the value of DNO support will depend heavily on timing. Advice and insight are most useful when they can influence funding bids, programme design, procurement strategies and local investment plans before those decisions are locked in. It is therefore important that DNO engagement is not reactive or purely consultation-based, but is structured in a way that supports earlier and more iterative planning.

Q7. How could iDNOs support the proposals in this portion of the consultation? How could either private wire connected properties or licence-exempt networks feature in these proposals?

iDNOs should be included where they are materially relevant, because they will often hold important local insight and may serve developments or locations that are significant to electrification pathways.

At minimum, iDNOs should:

- Participate in data-sharing and local coordination arrangements
- Provide relevant inputs into place-based planning where their assets or customers are affected
- Work with host DNOs where network conditions and delivery opportunities span different ownership arrangements

Private wire and licence-exempt networks should also be considered, particularly in apartment blocks, communal systems, mixed-use developments and other environments where the customer experience is affected by infrastructure outside the incumbent DNO's direct ownership.

We would support a proportionate approach. These arrangements should be brought into scope where they are relevant to delivery or system planning, without creating unnecessary complexity in cases where they are not material. The key point is to avoid blind spots. Some of the housing types most likely to require careful coordination, particularly higher-density or

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more complex buildings, may also sit behind non-standard network arrangements. Excluding them could undermine both equity and efficiency.

Q8. We are keen to understand how these proposed Enhanced Co-ordination activities could best integrate with NESO's RESP processes in the near and long term, and how these proposals could complement, or be in tension with, RESP development?

Enhanced Co-ordination should complement RESPs, not compete with them.

In our view, the right division of labour is:

- RESPs provide the strategic regional planning framework
- DNOs provide the detailed local network intelligence, operational understanding and practical delivery interfaces
- Local actors provide place, housing and programme intelligence
- Delivery organisations provide evidence on what is feasible in practice, how consumers respond and how much interventions cost to deliver

In the near term, Enhanced Co-ordination can improve the quality of information feeding into RESP development by grounding regional planning in more practical local evidence. In the longer term, it can provide one of the mechanisms through which RESP priorities are translated into place-based delivery.

Potential tensions arise only if roles are poorly defined. DNOs should not be seen as replacing NESO's strategic role, and local stakeholders should not be burdened with multiple overlapping planning processes.

We would therefore encourage clear governance on the interface between DNO coordination, RESP development and any future Warm Homes Agency or related delivery structures. Without that clarity there is a risk that similar conversations happen in parallel, the same datasets are requested multiple times, and local actors are left unclear about which planning process is actually shaping investment decisions.

Done correctly, these processes should be mutually reinforcing. RESPs should help establish the strategic direction and priorities. Enhanced Co-ordination should help translate those priorities into realistic local pathways.

Q9. Do you think if DNOs adopted the type of Expanded Role described above this would add value and support the rollout of LCTs and EE? Could this model provide an effective and viable way to deliver network and system benefits? If so, could this be achieved while also prioritising support for low-income households?

Yes. In our view, an Expanded Role would not only add value, it is likely to be necessary if the UK is to deliver electrification at least cost.

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The current model still tends to assume that rising demand should primarily be addressed through network reinforcement. We do not believe that is the most efficient default in all cases. There will increasingly be situations where:

- targeted deployment of low carbon technologies
- enabling energy efficiency measures and
- smarter management of demand

are more cost-effective than conventional reinforcement alone.

If DNOs are prevented from acting in those cases, consumers risk paying more than necessary for the transition.

We therefore believe an Expanded Role could provide an effective and viable route to delivering network and system benefits. It would allow DNOs to:

- Avoid or defer reinforcement where lower-cost alternatives exist
- Accelerate electrification in places where it is most beneficial to the system
- Improve utilisation of existing infrastructure
- Create stronger incentives for place-based delivery
- Reduce overall system cost

This should not be viewed as DNOs moving into a generalised energy services role. Rather, it should be understood as a tightly justified extension of regulated activity where customer-side measures are demonstrably the most efficient infrastructure solution.

We also strongly believe this can and should be designed in a way that supports low-income households. However, without explicit policy design, there is a material risk that an expanded DNO role defaults towards the most commercially straightforward opportunities: for example, supporting higher-income households who are already more able to adopt LCTs. This would undermine both equity and system efficiency.

To address this, we recommend that Ofgem embeds the following parameters within any expanded role:

- A defined proportion of DNO-supported activity should be targeted at fuel-poor households, social housing and deprived areas
- Performance metrics should include outcomes such as bill reductions, EPC improvements and carbon savings in low-income areas, not solely network metrics
- Delivery models should encourage integrated interventions (fabric, heating and flexibility) to avoid suboptimal outcomes for vulnerable households

This ensures that system efficiency and social value are delivered together, rather than in tension.

Again, this is not only a social argument – it is a system-efficiency argument. If low-income households are excluded because they cannot self-fund, the transition becomes slower, less

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equitable and ultimately more expensive. Large parts of the housing stock remain inefficient, electrification is patchier, and the benefits of flexibility and load reduction are not captured where they could be.

In many areas, network constraints, poor housing quality and lower-income households will overlap. That means support for low-income households can deliver both social and system value. Ofgem should therefore design the Expanded Role so that DNOs are able and (in appropriate cases) expected to target support at such households, where doing so contributes to network and wider system outcomes.

Q10. What are your views on us considering these proposals using a network benefit and wider system benefits approach? Do you have relevant information on the likely network, system, consumer or efficiency benefits of such an approach?

We strongly support Ofgem taking a network benefit and wider system benefits approach. A narrow network-only lens risks locking in structurally higher costs for consumers.

A proper assessment framework should include:

- Avoided or deferred reinforcement
- Improved asset utilisation and additional headroom
- Lower peak demand
- Flexibility value
- Reduced system costs from better alignment with low carbon supply
- Consumer bill savings
- Improved affordability and resilience outcomes
- Delivery efficiencies from area-based approaches, including shared mobilisation, surveying and engagement costs
- Better sequencing of enabling works, fabric improvements and technology deployment

We would emphasise two wider points:

1. The cost of electrification can be materially reduced if network-enabling works, energy efficiency and low carbon technology deployment are planned together rather than separately.
2. Delayed participation by lower-income households creates wider costs. It can entrench inequality, reduce the scale benefits of area-based delivery and leave harder-to-treat homes for later, when decarbonisation pressure may be greater and delivery more expensive.

We therefore support a whole-system framework that values both direct network outcomes and wider benefits to consumers and the energy system.

We would also encourage Ofgem to think carefully about appraisal horizons. Some customer-side interventions may not outperform reinforcement on a narrow short-term basis but can deliver better value over time when whole-life system cost, consumer outcomes and network optionality are taken into account.

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Q11. Do you have any views on the archetypes presented and their implications? Do you have any other approaches we should consider?

The archetypes are useful illustrations, but in our view the most promising route is not a single archetype in isolation. It is a staged pathway:

1. Implement Enhanced Co-ordination as a baseline
2. Pilot hybrid approaches that combine groundwork, targeted participation and funding
3. Retain more focused intervention models for locations where the network-value case is especially strong

Technologies and measures in scope

Ofgem should avoid defining this too narrowly. Solar PV, batteries and smart controls are clearly important. However, heat pumps should also be firmly in scope, as should enabling energy efficiency measures where they improve electrification readiness, reduce peak demand or lower the cost of deploying low carbon heat.

If the objective is to enable a cost-effective transition, it would be artificial to separate “technology” from “fabric” where the latter materially affects system outcomes. In many homes, especially low-income homes, heat pump deployment and affordable operation will depend on some degree of energy efficiency improvement. We therefore support a broad scope including:

- Smart controls and flexibility-enabling technologies
- Solar PV and batteries where network and system value is clear
- Heat pumps and other low carbon heat solutions
- Enabling works
- Targeted energy efficiency where it materially supports electrification, affordability or network outcomes

Identification of suitable properties and consumer engagement

DNOs are well placed to identify priority geographies and broad categories of property from a network perspective. They are not, in our view, best placed to run the entire consumer journey alone.

The right model is partnership. DNOs should identify priority areas and the network rationale. Experienced delivery organisations, local authorities, housing providers and trusted community-facing intermediaries should then help identify suitable households and deliver engagement.

Trust matters. Many households, especially vulnerable or low-income households, respond better when engagement is routed through organisations they recognise and when support is framed in terms of practical household benefit, not solely system need.

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In our experience, the quality of engagement has a material effect on conversion, successful delivery and ongoing consumer confidence. This is one reason why existing delivery channels with trusted brands and established support journeys should be leveraged, rather than bypassed.

Funding approaches and implications

This is the most strategically important issue in the consultation. We support Ofgem enabling DNOs to fund or co-fund interventions where there is a clear and evidenced network or system benefit, and where that option is lower cost than traditional reinforcement. Failure to do so would create a structural bias towards capital-intensive network solutions.

In practice, we see three main funding models worth exploring:

- Targeted co-funding, where DNOs fund the proportion of cost justified by network and system benefit
- Blended place-based funding, where DNO investment is combined with public grants, social housing investment or other sources
- Tightly defined full-funding models where the network-value case is especially strong and socialisation is justified

We are more cautious about any model that relies heavily on consumer debt, particularly for low-income households. Finance may have a role, but it should not become a substitute for proper support in cases where households cannot reasonably self-fund.

Responsibility for installations

We do not generally think DNOs should become direct installers. That would risk market distortion, capability stretch and unnecessary governance complexity.

A stronger model is for DNOs to:

- Define outcomes and target geographies
- Set network-related requirements
- Fund or co-fund delivery
- Procure competitively or partner through clear frameworks
- Monitor outcomes

Installation responsibility should generally sit with qualified delivery organisations.

Market structure and delivery safeguards

It is important that any expanded DNO role is designed to preserve competitive delivery markets and avoid unintended distortion. In practice, this should include:

- Clear delineation of DNO responsibilities, focused on planning, coordination, data provision and strategic investment, rather than direct delivery

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- A requirement that all delivery activity is competitively procured and open to a wide range of qualified providers
- Transparency in funding allocation, partner selection and performance reporting

This approach preserves the strengths of DNOs as system coordinators, while enabling experienced delivery organisations to operate at scale in a competitive and efficient market.

Ownership and control of assets

In most cases, DNOs do not need to own domestic assets in order to secure value. In many instances, outcomes can be secured through:

- Interoperability standards
- Participation agreements
- Data-sharing requirements
- Smart control arrangements
- Performance-based contracts

Where assets have flexibility value beyond the local network, arrangements should preserve consumer choice and compatibility with wider markets, rather than locking assets into unnecessarily restrictive structures.

Q12. Do you have views on whether pilots of these approaches would be valuable? And, if so, whether the pilots should potentially include a range of options across archetypes, or whether the scope should be narrowed in advance? What should be the main focus of any pilots?

Yes. Pilots would be highly valuable and should proceed.

We would support pilots that test a small number of clearly defined use cases across different geographies and customer groups. They should not be so broad that they fail to answer practical design questions, but nor should they be so narrow that they exclude the most important issues.

In our view, pilots should focus on:

- Constrained areas where electrification pressures are emerging
- Places where low-income households overlap with network opportunity
- Mixed-tenure neighbourhoods, not only single-tenure settings
- Models that combine DNO system insight with third-party delivery capability
- Heat pump-inclusive models, not just solar and battery interventions
- The sequencing of enabling works, consumer engagement and installations
- Different funding structures, including co-funding and blended funding
- Robust measurement of network, system and consumer outcomes

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The main objective of pilots should be to establish:

- What DNOs should do directly
- What delivery partners should do
- What benefits can genuinely be measured and attributed
- What funding models are practical and proportionate
- How low-income households can be included effectively

We would also note that, although the formal ED3 framework is expected to start in 2028, there may be value in exploring whether elements can be trialled earlier where credible proposals and delivery partners exist. Early pilots would help reduce implementation risk and provide a stronger evidence base for ED3 design.

Given our experience delivering place-based programmes and supporting low-income households at scale, we would welcome the opportunity to support the design and delivery of ED3 pilot activity, particularly where there is a focus on integrating network need with low-income household support and area-based delivery.

Q13. How could iDNOs support the proposals in this portion of the consultation?

The same broad principles apply here as in response to Q7. If Ofgem proceeds with an Expanded Role, iDNOs should be incorporated in a way that avoids blind spots and fragmentation.

That means iDNOs should:

- Share relevant data into local planning and pilot processes
- Collaborate with host DNOs where system value spans multiple network ownership arrangements
- Participate in pilots where their geographies or customers are relevant
- Not be excluded from delivery models simply because they are not the incumbent DNO

A proportionate framework for iDNO participation will be increasingly important as electrification plays out across new-build, mixed-network and more complex development environments.

Summary

Ofgem is right to ask these questions now. In our view, this consultation identifies a genuine opportunity to move from a model in which networks mainly respond to demand, to one in which they help shape demand and coordinate delivery in the most efficient way.

We strongly support Enhanced Co-ordination as a baseline for ED3. Beyond that, we believe Ofgem should move positively towards an Expanded Role for DNOs, including the funding and co-funding of low carbon technologies and enabling measures where this can be justified by network, system and consumer benefit.

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The key design principles should be:

- Additionality rather than duplication
- Partnership rather than DNO monopolisation of delivery
- Whole-system value rather than a narrow asset lens
- Explicit inclusion of low-income households, supported by clear targets and outcome metrics
- Strong consumer protection and trusted engagement
- Compatibility with wider public funding and delivery frameworks
- Clear guardrails to avoid market distortion and ensure competitive, transparent delivery models

Put simply, if homes and households are now part of the infrastructure challenge, then the regulatory model needs to reflect that reality.

We would welcome further engagement with Ofgem as this work develops and would be pleased to discuss any aspect of this response in more detail.

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