

2<sup>nd</sup> April 2026

To whom it may concern,

**Community Energy Scotland – Consultation response to Ofgem’s ‘DNOs’ future role in supporting the rollout of low carbon technologies’**

Community Energy Scotland collaborates with communities and our partners to support, promote, and represent the community energy sector. We do this by providing technical assistance, knowledge sharing, and championing the role of community-led action in the transition to a low-carbon future. Our vision is of communities actively shaping a low-carbon society that values wellbeing for all.

Community Energy Scotland is Scotland’s only national charity dedicated to supporting communities to develop their own renewable energy projects, helping create a low carbon future while building community wealth. We represent more than 450 community energy groups across Scotland. They are ‘more than profit’ groups that organise collective, local, community-led projects.

Many of our members start with the desire to generate revenue for the community, to address local challenges. They find that developing a community-owned turbine, solar panels or a hydro scheme and selling the electricity is one of the best ways to earn income to meet community need. We support community energy groups to develop their projects, apply for funding, establish governance structures, and build community capacity.

Community Energy Scotland is part of the [Scottish Community Coalition on Energy](#), working to ensure that communities enjoy a Fair Energy Deal as part of a just transition to net zero.

Throughout this consultation we have remained focused on where community organisations have a unique challenge and/or opportunity, hence our response is reasonably narrow in scope.



## Question 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. Community Energy Scotland believe that DNOs are uniquely placed to enable the roll out of LCTs and EE measures.

Community Energy Scotland have recently used the SSEN Local Energy Net Zero Accelerator (LENZA) tool which shows a co-ordinated approach between Local Authorities and DNOs to plan future LCT and EE measures roll-out.

Although this is a useful tool, the data presented would benefit from further granularity in terms of energy consumption data, identification of low-income housing, and areas where flexibility is required. This would enable targeting for LCTs and EE measures. Additionally, this would allow communities to determine the best areas to invest community benefit fund money, such as insulation on low-income housing, or batteries for constrained areas of the network.

Community energy projects frequently involve the installation of LCTs and EE measures on households and community owned buildings. DNOs are well placed to facilitate the identification of suitable LCT deployment locations in combination with energy consumer locations to aid in the utilisation of schemes such as Virtual Private Wires.

DNOs can increase the uptake of schemes such as Virtual Private Wires, and in turn, viability and deployment of community energy projects by making data available on local energy consumption to identify areas where generation can be 'netted off' against consumption. Reducing connection and use of system costs for these projects where there is no net impact on the wider distribution and transmission network would further increase viability of these LCT installations. Further, grid connections where generation can be shown to meet local demand should be prioritised ahead of larger export-only generation projects.

Low revenue from exporting generation to the grid is a barrier to many community energy projects. Where DNOs enable the development of Virtual Private Wires, balancing local demand and generation, network constraints can be reduced and increased benefits to the local community realised.

Low-income households are 'left behind' when it comes to installation of LCTs and EE measures as the upfront cost, and/or payback of even 0% interest loans is a significant barrier. DNOs have a role to play in identifying low-income areas in collaboration with other organisations, that would both reduce electricity demand and ensure widespread adoption of LCTs and EE measures.

DNOs could enable the roll out of flexible technologies such as batteries using a shared ownership approach, or an approach where they purchase the LCTs and EE measures for the households/communities and benefit from the load shifting and access to batteries to utilise for grid services where the household/community accepts.

Rural and island communities face barriers related to smart meter roll out due to poor communication signal. A co-ordinated approach with DNOs, energy suppliers, and community organisations would allow identification and targeting of these areas for improved communication methods and facilitate better energy modelling and monitoring.

There are significant barriers to community groups currently accessing flexibility markets therefore, funding for technical support to be provided to these groups to enable access to flexibility markets is recommended.

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

Community Energy Scotland agree with the overall rationale and scope of 'Enhanced Co-ordination.' In particular the requirement for DNOs to publish a Community Collaboration Plan and the DNOs to be held in breach of their license where they fail to do so.

Community Energy Scotland recommends that community energy organisation representatives are included in advisory groups given their local knowledge and their roles as trusted community representative (i.e. Community Energy Scotland, Community Energy England, Community Energy Wales). This would require dedicated funding from the DNOs and partnering with community energy organisations.

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

The data currently published by DNOs is in some respects useful but does not provide sufficient granularity of network constraints and future forecasts of headroom to adequately identify LCT development opportunities for communities.

More detailed data on energy consumption to the building or postcode level would be beneficial to identify areas where there is LCT potential to offset local demand and avoid additional congestion on the distribution network and in turn the transmission network. DNOs in collaboration with Energy Suppliers would be able to publish network load and energy consumption data to the primary or secondary substation level, for communities to use to target effective deployment of LCTs.

The presentation of the current tools differs between DNOs and there are multiple tools from the same DNO that do the same or a similar task. A single approach to data management, accessibility, and interactive tools would be beneficial to both technical and non-technical audiences. Further developing tools that will allow communities and non-technical audiences to see visually what LCT and EE measures that are most effective in their area would be of benefit. This would allow the communities to undertake their own early screening of potential options.

Some DNOs already provide a level of support for community energy groups, however, this support varies greatly between DNOs and is often not dedicated support but sign-posting to others within the DNO. DNOs should fund dedicated community energy data liaisons to help community groups interpret network data and provide support on targeted LCT and EE measures deployment.

The inclusion for a requirement for DNOs to publish accessible, mapping tools to visualise data within the Smart Optimisation Output (SOO), as highlighted in the 2025/26 Ofgem Connections End-to-end Review, would be of benefit to a wide range of community groups. They should further be required to publish low-voltage network data and information on future network upgrade works, timelines, and all data should be updated at least annually to give a reliable resource.

Publication of DNO Active Network Management (ANM) scheme data would be beneficial to allow targeted deployment of further LCTs and where demand side response is required. Community Energy Scotland is aware of the SSEN NeRDA dashboard which displays high-level ANM scheme data, however, further functionality of data visualisation and downloadable data would be of benefit to map opportunities for community energy LCT deployment to alleviate network stress.

**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?**

Community Energy Scotland agree that the data available could be strengthened in-line with the recommendations in Clause 3.37 of the Consultation document.

Additional non-DNO held data sets that would be of benefit to community groups would be Home Analytics<sup>1</sup> data. This would enable identification of opportunities of LCT and EE development and targeting of vulnerable or low-income areas/households.

Many community generation schemes would become viable where there was a local off-taker of energy, with many investigating the feasibility of EV chargers. Non-DNO held data that could facilitate identification of suitable EV charging points would be beneficial, linked with the DNOs own data on energy demand and generation on those areas. This can enable deploying renewable generation in communities where there will be an increase in demand with EV use.

Data should be published on where flexible assets can be located and how community assets can be utilised by aggregators such as use of small-scale domestic battery systems to provide combined grid services and balancing. This would also benefit from mapping of areas where there are lower costs for connection allowing community groups to predict project capital costs. As stated earlier in this response, funding for technical support to be provided to community groups to enable access to flexibility markets is recommended.

In general, DNOs should invest in network capacity, smart monitoring and low voltage ANM, to allow community LCT projects such as communal heat networks, shared solar and battery systems, and EV charging hubs to be developed without facing costly connections and unpredictable connection constraints.

**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. Community Energy Scotland agree with the type of Expanded Role proposed, in particular, where low-income areas can be identified and supported to install LCTs and EE measures as the cost of these measures are a significant barrier.

Bulk purchasing and installation of LCTs and EE measures such as batteries, insulation and solar PV can alleviate grid demand and ensure low-income households are not 'left behind' in the energy transition.

There is a risk that imposing further responsibilities on the DNOs would slow processes and create bottle necks. It should be ensured that any future additional Expanded Role the DNOs adopt will be effective, produce timely results, and be funded.

Yours faithfully,  
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<sup>1</sup> <https://energysavingtrust.org.uk/service/home-analytics/>