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DNOs' future role in supporting the rollout of low carbon technologies

EDF is the UK's largest producer of low carbon electricity. EDF operates low carbon nuclear power stations and is building the first of a new generation of nuclear plants. EDF also has a large and growing portfolio of renewables, including onshore and offshore wind and solar generation, as well as energy storage. EDF is therefore driving the transition towards 'an Electric Britain' – a secure, affordable, low-carbon future for everyone. As Britain's biggest generator of zero carbon electricity, we are investing more than £100 million weekly in Britain's electricity infrastructure. We supply millions of customers with electricity and help homes and businesses switch to electricity for heating, transport and industrial processes.

EDF welcome Ofgem's consultation on the Distribution Network Operators (DNOs) future role in supporting the rollout of Low Carbon Technologies (LCT) and its acknowledgment that the energy transition, and the move away from fossil fuels to LCT must not leave any households behind, especially those on a lower income who could otherwise not afford to engage in the electrification journey. This transition must take place now, at pace and at scale. Reducing energy bills and boosting energy security has never been so important for consumers given the potential implications for energy prices arising from the recent events in the Middle East.

We have set out our key points below and our detailed responses are set out in the attachment to this letter.

DNOs should not play an Expanded Role

- DNOs have a vital role to play in the energy transition and must prepare the network for the roll-out of LCT - the focus of reforms under Electricity Distribution 3 (ED3) should be ensuring that DNOs perform this core role well and new duties must not distract from this.

- We strongly oppose any Expanded Role for DNOs as they do not have the requisite experience or capacity to roll out LCT and traditionally do not fulfil any of the core roles in the supply chain: consumer engagement, identifying low-income households or

retrofitting homes. An Expanded Role would be undeliverable at worse, or at best outsourced[1].

Low-Income Households cannot be supported purely by an area-based approach led by DNOs

DNO LCT delivery would be tied to a street-by-street approach and partnerships with Local Authorities. However, this cannot be the only means to deliver LCT to low-income homes.

- Current Local Authority led retrofit schemes underspend significantly, in recent years averaging 43%[2] underspend as well as significant regional variation dependent on resource, expertise and increasingly more important - political inclination. Mayoral Strategic Authorities and devolution can only partially resolve this.

- Street-by-Street Delivery is much more likely to be in successful in social housing where co-ordination is with a single entity, such as a Housing Association, that can make decisions on behalf of tenants. Owner occupiers cannot be compelled to install LCT en-masse. Only 15% of the fuel poor live in social housing – there must be another solution that reaches all households.[3]

Suppliers have a unique role in delivering LCT to households at scale

- An Expanded Role for DNOs would be terribly slow and incremental with pilots not beginning until at least 2028, but households need support now. A new scheme must be at scale, support **all** low-income homes, with a simple and efficient end-to-end electrification journey.

- Despite the end of the Energy Company Obligation (ECO) suppliers continue to offer a unique position in the market. Suppliers delivered 80%[4] of all energy efficiency measures in GB under ECO and continue to have the resource and expertise to deliver at the scale demanded now and not several years down the road.

- One of the key purposes of the Warm Homes Plan is to tackle the enduring energy affordability crisis that will only intensify so long as the Middle East Crisis continues. Enabling a role for suppliers can guarantee that this objective is met:

    - **Suppliers' consumer facing role and engagement with customers in debt** enables simple identification of those struggling to afford their energy bills across all regions and housing tenures.

[1] Under the Community Energy Saving Programme Generators took a similar position and outsourced their obligation
[2] https://www.gov.uk/government/statistics/green-homes-grant-local-authority-delivery-lad-and-home-upgrade-grant-hug-release-november-2025 and https://www.gov.uk/government/statistics/social-housing-decarbonisation-fund-statistics-february-2026
[3] https://www.gov.uk/government/consultations/improving-the-energy-efficiency-of-socially-rented-homes-in-england/improving-the-energy-efficiency-of-socially-rented-homes-in-england
[4] DESNZ - Household Energy Efficiency Statistical Release March 2025 (data to December 2024)

- **Suppliers manage the demand side** and legally are the only entity that can install the smart meter and offer Type of Use (TOU) and Export Tariffs to enable consumers to get the most out of their LCT. Consumer flexibility will also further reduce bills and is essential to strengthen grid stability.

- **Suppliers have in-house LCT installers** enabling simpler supply chains that will lower costs and deliver LCT efficiently at pace via a one-stop-shop approach.

Why heat pumps are vital in the energy transition and how they can still deliver network benefits

- EDF support roll out of LCT suggested in the consultation including solar and batteries. However, heats pumps should not be dismissed. Ofgem should look at wider benefits in addition to network benefits. If heat pumps are not rolled out there will continue to be dependence on gas for heating which presents a risk in terms of energy security as well as to decarbonisation goals (note as above current Middle East Crisis).

- Heat pumps provide consumer benefits and often directly create bill savings for households on their own if replacing inefficient electric heating, or off-gas grid carbon-based heating such as oil. Replacing inefficient electric heating with a heat pump will also directly increase network capacity.

- In all circumstances if the demand side is managed effectively through smart meters and type/time of use tariffs this will further reduce strain on the grid. As above, suppliers are the only entity that can legally provide these services.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Nicola Pope or myself

I confirm that this letter and its attachment may be published on Ofgem's website.

Yours sincerely

Keith Watson
Senior Manager Customers Policy and Regulation

Attachment
DNOs' future role in supporting the rollout of low carbon technologies

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?

We agree that there is a role for DNOs in co-ordinating the rollout of LCT and that for any area-based delivery it makes sense that there is mutual awareness of plans for retrofit and network investment as this this will enable efficiencies, reduce costs and will enable networks to make sure that investments are effectively targeted at areas that will electrify sooner.

As set out in our response to Q9-15 we do not agree that DNOs should play any Expanded Role, due to their lack of expertise in the LCT and energy efficiency space. To help make the transition more efficient and affordable for everyone DNOs should focus on improving performance in their core roles including faster connection approvals, pro-active works where necessary and streamlining gas disconnections. The decision to include pro-active unlooping in ED3 is very welcome in this regard. Any co-ordinating role should not distract from DNOs ability to perform existing duties well.

We do not agree that DNOs have a direct role in supporting low-income households, as they do not have a consumer facing role nor, to our knowledge, do they hold any data or information that would indicate the financial circumstances of households. Additionally, DNOs do not have the resource or expertise to install LCT directly or via a third party, and vitally they cannot offer *post-care* – which will be essential to reduce any impacts on network capacity from the LCT and for households to maximise bill savings (e.g. installing a smart meter, offering an appropriate TOU and Export Tariffs). In fact, only suppliers can fulfil all these roles, and no other actor in the market can legally and fully manage the *demand* side – only the energy supplier.

Whatever the outcome, and as consultation alludes to other delivery routes for LCT remain essential including a role for energy suppliers, who through the defunct Energy Company Obligation (ECO) have the resource and expertise already to install LCT at scale, and as set out above hold a unique position in the market as the only actor that can oversee the end to end electrification journey (Q9).

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

EDF agree with the overall rationale for an 'Enhanced Co-ordination' role for DNOs and that it will enable a more strategic, long-term approach to network investment if implemented effectively. However, Ofgem need to consider:

- **Efficiency:** Focus should be on DNOs performing current duties well including faster connections and more pro-active preparations to enable the network to be ready for the roll-out of LCT. Any enhanced roles for DNOs must not increase bureaucracy nor distract DNOs from performing core duties effectively and efficiently.
- **Equitable delivery:** How to ensure that DNO co-ordinating roles are delivered equitably across all DNO geographical areas (including iDNOs) to ensure that there is not a regional lottery.
- **Funding:** Appropriate funding routes, and the impacts to consumers if the cost is added to bills (versus Government ring fenced funding).
- **Enforcement:** Consequences if DNOs fail to deliver on their obligations, as well as rewards where they achieve beyond the minimum requirements, and how to reflect this in DNO incentive structures.
- **Avoiding duplication:** Any DNO collaboration plans or data sharing must not duplicate other regional plans including Local Area Energy Plans (LAEP), Regional Energy Strategic Plans (RESPs), Transitional RESPs (tRESPs), Warm Homes Agency, Network Development Plans. Otherwise, the proposals risk inconsistency, unnecessary complexity, and unjustified additional costs.
- **Interoperability:** DNO data sharing and software tools must be accessible to national as well as local entities who may also support the role out of LCTs (such as energy suppliers, installers) and Ofgem should consider whether a level of standardisation between DNOs is necessary to enable this to happen.

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?

We agree that Community Collaboration Plans, if implemented effectively, can help ensure that there is co-ordination between network investments and retrofit plans.

However, DNO collaboration plans must not duplicate other regional plans already in the making including LAEPS, RESPs, tRESPs, Warm Homes Agency work and Network Development Plans. Duplication would create inconsistency that will add unnecessary complexity that could hinder the rollout of LCT, as well as create unjustified additional costs. Ofgem must collaborate with other relevant stakeholders to mitigate this risk and to ensure that plans are co-ordinated.

We agree that plans should be monitored through reporting which provides a vital check to ensure compliance with any new obligations. However, as well as monitoring, there must also be clear consequences if DNOs fail to deliver their obligations, and benefits for DNOs that over-deliver, and this should be reflected within DNO incentive structures.

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

Others are best place to provide a view.

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?

DNOs do not directly hold data on low-income properties (although they will hold data on vulnerabilities through their PSR registers). The publicly available data that DNOs will be able to access such as Indices of Multiple deprivation (IMD) can identify clusters of low-income properties. However, this is likely to have limitations and will be a poor proxy for fuel poverty on a national scale. Analysis by BRE of 2009 English Household Survey (EHS) data, indicated that 22.4% of households in the bottom 10% of the IMD were in fuel poverty compared to the national average of 18.4%. Relying on this alone could in effect mean that the majority of fuel poor households do not get support.

Local Authority data can help but their expertise is likely to be for areas of social housing rather than owner/occupiers or the privately rented sector. Local Authorities will also hold data on certain private tenure properties such as Council Tax Support, Housing Benefit, and social care records. However, these do not always correlate to low-income directly, for example Council Tax Reductions are applied when there is a single person in a property, the house is unoccupied, or occupants are students.

This means it is essential that data comes from sources beyond DNOs and Local Authorities. Energy Suppliers have readily available data to identify households struggling with energy affordability through interactions with customers that are in debt, which will be at a national level for all housing tenure types. Debt information can also be cross-referenced with other data that supplier's hold such as DWP benefits (Warm Home Discount), the PSR register, Third Party Deductions, Self Disconnection and Self Rationing with a Prepayment Meter that could also indicate affordability issues.

Government must also significantly advance their own data sharing through progressing work on a multi-sector PSR including sharing HMRC income data which will provide the most robust information on incomes for households.

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

DNO software tools must be accessible to national as well as local entities who may also support the role out of LCTs across regions (such as energy suppliers, installers) and Ofgem should consider whether a level of standardisation between DNOs is required to enable this to happen.

Ofgem must also ensure that any new DNO software such as maps does not duplicate other visualisation work. For example, tRESP already includes maps that visualise for the DNOs areas

where network investment is required to meet net zero goals, including for the installation of domestic LCT including heat pumps, solar and batteries.

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

iDNOs supply around 1.5 million customers totalling around 6% overall population. Ofgem proposals must ensure equitable treatment for customers irrespective of whether they are served by a DNO or iDNO.

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?

Ofgem must ensure that any new DNO Enhanced Co-ordination work does not duplicate the work of NESOs RESP. The tRESP for example already includes maps that visualise areas where network investment is required to meet net zero goals, including installation of domestic LCT including heat pumps, solar and batteries.

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?

No. We strongly oppose DNOs playing a role in delivering the roll-out of LCTs and EE and do not agree that this would add value or provide any benefits. The reasons for this are clear:

- **Lack of experience and expertise:** DNOs have no experience or expertise whatsoever in rolling out LCT and traditionally do not have a consumer facing role. All models would pose a significant change to the remit of a DNO. As a result, it is likely that that DNOs would outsource any delivery requirements which would defeat the object of their inclusion under this role, increasing the cost of any scheme through the necessary creation of more complex supply chains.

  The last time an energy efficiency scheme obligated a non-consumer facing regulated energy party was the Community Energy Savings Scheme (CESP) which included a mandatory role for generators where they did indeed outsource their obligation.

  Evaluation of that scheme by the then Department of Energy and Climate Change (DECC) stated that. '*The independent generators' approach has been to outsource their obligation by either contracting or trading it out. Their experience of CESP has not been positive and they believe their inclusion in the programme was inappropriate: their lack of*

in-house expertise on energy efficiency programmes and their lack of interface with household consumers were major challenges.'

The result of the failure of the scheme was the introduction of the Energy Company Obligation (ECO) which placed an obligation directly on suppliers successfully for over a decade. Despite the end of ECO, we do not want a repeat of the same policy mistake.

- **Link to Local Authority under delivery:** DNO delivery is strongly linked in DESNZ Warm Homes Plan to Local Authorities (in partnership) - who notoriously underperform with underspend from schemes prior to the Warm Homes averaging 43%[5] as well as significant regional variation dependent on resource, expertise and increasingly more important - political inclination. Government has not yet published detailed data on their Warm Homes: Local Grant and Warm Homes: Social Housing Decarbonisation fund. However, while we are still waiting for data from Local Authorities, initial figures indicate last year only 852 homes were reached in stark contrast to the 1.7 million homes that Government want to reach under their new Warm Homes Schemes[6].

- **Street by street delivery with DNOs and Local Authorities likely to be most successful at scale for social housing rather than mixed tenures:** As the consultation itself states area-based delivery has to date been more successful in social housing[7] This is also indicated in DECCs evaluation of the Government's last area-based scheme CESP where street-by-street delivery was really only successful for social housing in part because tenants 'felt compelled to take part' but also because it was easier to co-ordinate with energy suppliers working with one entity the social housing provider. Take up in private housing was much lower because such homes were simply not targeted[8] but it also requires the engagement and buy in of each individual home which is much harder to achieve.

  One of the challenges will be how to reach low-income households beyond social housing as fuel poverty exists universally across all housing tenure types. Only 15% of the fuel poor live in social housing.[9] While there may be small successes or trials it is difficult to see how area-based delivery can work at scale outside social housing, without Government intervention.

As the consultation itself acknowledges, any role for DNOs would be terribly slow and incremental (beginning with pilots under ED3 and then not until at least 2028). Whatever the outcome, what is

[5] https://www.gov.uk/government/statistics/green-homes-grant-local-authority-delivery-lad-and-home-upgrade-grant-hug-release-november-2025 and https://www.gov.uk/government/statistics/social-housing-decarbonisation-fund-statistics-february-2026
[6] https://www.gov.uk/government/statistics/warm-homes-local-grant-statistics-february-2026 and https://www.gov.uk/government/statistics/warm-homes-social-housing-fund-statistics-february-2026
[7] While there have been smaller pilots of area-based approaches, and this approach is far more common in the social housing sector where cycles of repair and maintenance allow portfolios of properties to be improved at the same time, there are only limited examples of area-based delivery being deployed at-scale in private tenure homes
[8] One of the key issues raised by stakeholders was that private households had either not been targeted in schemes, or where they had, take-up had been low. This view is supported by Ofgem figures, which show that measures were being promoted to private households in just over a third of proposed schemes at the end of 2010 (Ofgem, 2011b)
[9] https://www.gov.uk/government/consultations/improving-the-energy-efficiency-of-socially-rented-homes-in-england/improving-the-energy-efficiency-of-socially-rented-homes-in-england

very clear is that other delivery routes remain vital to ensure that low-income households continue to be supported with retrofit at scale, across all house types. Consequences do not bear consideration in terms of the risk to fuel poverty targets, energy security, decarbonisation goals, and the supply chain if the counterfactual were the case.

- **LCT roll-out must cover the end-to end- electrification journey:** DNOs potential should be contrasted with energy suppliers - who must continue to play a role in LCT rollout. Suppliers have been delivering energy efficiency schemes for more than two decades (since 1994[10]) and have unmatched resource and expertise to deliver at scale without the need for trial and piloting. Suppliers delivered 80% of energy efficiency measures in 2024.[11] No other government retrofit scheme has come close to the volumes of support delivered via obligations.

Suppliers' engagement with consumers is unique because they can manage the end-to-end electrification journey simply and efficiently providing a one stop shop from:

- **Pre-installation** - Simple and direct dentification of low-income households (through interactions with customers in debt and other data points)
- **Arranging the installation** - Suppliers have in-house teams installing LCT or at the very least will have established relationships with installers through ECO – this enables a simple, cost-efficient supply chain
- **Post installation care** - For example, only energy suppliers can *directly* arrange a smart meter installation and *directly* offer and agree appropriate TOU tariffs. No other entity can legally manage the Demand Side

Suppliers' pivotal role in enabling flexibility will also maximise benefits: in terms of the bill savings (for consumers) and increased grid capacity due to lower overall electricity usage (for networks). This will help tackle the affordability crisis head on and will reach all housing tenures not just social housing. DNOs currently perform none of the roles in the LCT journey. Without a role for energy suppliers, it is unclear how the electrification journey can be joined up or how it can be rolled out at the scale demanded by the Warm Homes Plan ambition.

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?

As set out in our response to Q9, DNOs should not adopt an 'Expanded Role' and there would be no specific benefits only costs to this approach. However, DNOs should play a pro-active rather than re-active role in preparing homes for LCTs (e.g. unlooping, fuse upgrades). Any further additional duties will distract DNOs from performing their existing core role effectively which should be Ofgem and the Government's priority.

[10] The Energy Efficiency Standards of Performance (EESoP) was the initial, early iteration of supplier obligations.

[11] DESNZ - Household Energy Efficiency Statistical Release March 2025 (data to December 2024)

Currently DNO approval times for LCT installations such as heat pumps, solar and EV chargers is inconsistent at best with significant regional variations and a clear North-South divide. For example, the best performing DNO UK Power Networks (UKPN) approves 67% of requests within 24 hours, whereas the worst performing Scottish Power only 2%. Similarly for average approval times UKPN approves requests on average within 7 days, but the worse performing DNO Northern Power Grid takes on average 32 days.

These more fundamental aspects of the DNO role must work well before there is any consideration of the taking on further duties. Otherwise, there is a risk that DNO performance in core duties continues to deteriorate, which could put Government's ambitions under the Warm Homes Plan further in jeopardy. No DNO even the best performing is meeting the Warm Homes ambition that 80% of connections are approved within 24 hours, far from it. Ofgem must track DNO progress in these core roles and take action where significant progress is not being made.

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

EDF has not assessed the archetypes in the consultation in detail due to our view set out in Q9 that DNOs should not have any Expanded Delivery role.

On the technologies and measures that should be supported: Do you have evidence on the relative costs and benefits of different technologies? How could heat pumps and other low-carbon heating technologies be included whilst still offering wider system benefits?

EDF support the roll out of LCT technologies suggested including solar and batteries. However, heats pumps should not be dismissed. Heat pumps will provide system benefits if they replace inefficient electric heating (such as an electric boiler) increasing network capacity as households will be able to use less electricity to heat their homes.

Ofgem should also look at technologies in terms of wider benefits (not just benefits to the network itself). If heat pumps are not rolled out, there will continue to be reliance on gas networks for heating which presents a risk in terms of energy security, as well as to decarbonisation goals.

In terms of consumer benefits, heat pumps often directly create bill savings on their own e.g. if replacing inefficient electric heating, or off-gas grid carbon-based heating such as oil (where prices are much higher and volatile due to a lack of regulation - the risks and consequences of which we are seeing because of the current middle east crisis.

Heat pumps will create bill savings for all households when paired with solar and batteries, which will in turn benefit the networks in terms of increased capacity. If the demand side is managed effectively through smart meters, type/time of use tariffs and so on this will further reduce strain

on the grid and drive additional value for consumers. Suppliers are the only entity that can directly and legally offer these services.

On the identification of suitable properties and consumer engagement: Would DNOs be well placed to proactively identify suitable properties and/or engage with consumers, or are there other actors better place to perform these functions?

No. As set out in our response to Q9, DNOs are not best suited for consumer engagement as they do not have a consumer facing role. DNOs, to our knowledge, also do not directly hold any data that will help identify low-income households.

For area-based delivery local authorities will have a level of expertise at identifying suitable low-income households and engaging with relevant households. However, this is likely to be restricted to social housing in most instances, but they will also hold data on homes that receive Council Tax Support, Housing Benefit, and social care records (and even then, the information is not always related to income).

Suppliers, however, remain the prime actor who can identify suitable low-income properties and who are already well versed in engaging and communicating with their customers as key part of their day-to-day role. Suppliers can simply identify low-income households through their regular interactions with customers in debt (Q5).

Our Supply Licence already requires us to communicate with and understand the circumstances of our customers and to ascertain appropriate treatment based on ability to pay when tackling debt. This is a simple route to identify low-income households without the need for complex data inputs from multiple sources (such as in a system visualisation) or any requirement for intermediaries such as Managing Agents or lead generators to identify or engage with households which can add both unnecessary complexity and cost to any LCT rollout.

This approach also offers an enduring solution to the affordability and debt crisis reducing bills on a permanent basis, as energy suppliers can directly and accurately target those struggling to pay their energy bills.

Suppliers' engagement with consumers is unique because they can manage the end-to-end electrification journey from identification of low-income households, to arranging the installation (see below) of the LCT, to post-care offering a one-stop-shop for consumers. For example, only energy suppliers can *directly* arrange a smart meter installation and *directly* offer and agree appropriate TOU or Export tariffs. DNOs or local authorities by contrast can only give generic advice on these matters. Suppliers' unique role, especially on the demand side, will maximise household benefits in terms bill savings which in turn will create network benefits in terms of increased capacity due to lower electricity usage.

On the potential funding approaches and implications: want are your views on the feasibility, or risks from these approaches; do you have evidence from other

sources that is relevant to these considerations?

EDF oppose DNO funding of LCT. Their lack of consumer facing role would make it extremely difficult for DNOs to effectively promote any offers available.

Mixed funding is also extremely complicated for the able to pay market and Government is already looking at offering simple zero/low interest loans through private finance under the Warm Homes Plan which could create a simple one stop shop for households that are interested.

- Property linked finance has failed (e.g. Green Deal where finance was linked to to the meter point aimed to reach fourteen million homes but only 14,000 households accepted the offer).[12]

- Customer contributions are also difficult to obtain in an ad-hoc manner. Most recently the Great British Insulation Scheme was unable to deliver within expected cost in part because Government assumed that consumers would contribute up to 10% of the cost of the measures but in practice they were not prepared to do so.

- Funding based on benefit to network would be complex, as well as difficult to explain to households – the bespoke nature of the funding would make it appear opaque. Households could only get support towards electrification if their network also benefited (a post-code lottery) - which could be perceived as arbitrary and unfair.

The Boiler Upgrade Scheme continues to be an exemplar, and its simplicity is the key to its success – a uniform grant payment for (until recent changes) a single technology.

On responsibility for installations: what are the risks and opportunities if DNO's were responsible for installations? What are the options for partnerships and how could different responsibilities offer better outcomes?

DNOs should not be responsible for LCT installation either directly or through sourcing third party installers. DNOs do not have any experience in installing LCT or procuring installers to rollout LCT on their behalf. Any requirement to take on this role will distract from performance of core DNO duties and would take time to develop at any significant scale and could end up potentially being outsourced as a result (see Q9).

Suppliers are well placed to directly install LCT or to arrange for the installation and have the requisite resource and expertise to do so at scale, from their years of experience delivering ECO. Suppliers including EDF often also have invested to establish in-house capabilities to install LCT for customers (in our case EDF Heat Pumps and Contact Solar). Where in-house supplier teams can be

[12] theguardian.com/environment/2016/apr/14/green-deal-scheme-did-not-deliver-energy-savings-audit-finds#:~:text=The%20National%20Audit%20Office%20has,below%20expectations%2C%20the%20report%20said. And https://www.janrosenow.com/uploads/4/7/1/2/4712328/eers_paper.pdf

utilised, this simplifies the installation journey, removing the need for complex supply chains, and reducing costs.

On ownership and control of assets: how can necessary level of network or system benefits be achieved without DNO control and ownership? Does this pose other risks and challenges, and how might these be overcome?

DNOs should not be the default controller of LCT assets under any circumstance. Other parties including energy suppliers offer asset optimisation. A monopoly that would allow DNOs to control assets, would distort the market and create an unlevel playing field for other participants. This would prevent fair competition and restrict optimal outcomes for households.

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 options across archetypes, or whether the scope should be narrowed in advance? What should be the main focus of any pilots?

EDF do not agree that there is any value in pilots – as DNOs should not play a direct role in rolling out LCT - for the reasons set out in Q9-12.

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

Similar to DNOs we do not agree that iDNOs should play an Expanded Role. However, that aside, should there become an Expanded Role for DNOs to ensure equitable treatment across all regions this should be extended to iDNOs (including any pilots).

EDF
April 2026