



ElectraLink



ElectraLink's Response to DNOs Future Role in Supporting LCT Rollout

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To Jack and the Net Zero Strategy team,

ElectraLink welcomes the opportunity to respond to Ofgem's consultation on the DNOs future role in supporting the LCT rollout. Our response focuses on the Enhanced Co-ordination section of the consultation.

ElectraLink believes that the DNOs are key in enabling and supporting the LCT Rollout as we move into the RIIO-3 price control. ElectraLink believes that there are large advantages to strengthening the system interface visualisation requirements, and that ElectraLink's already developed solutions, including EMPRIS and NZDE can be used to deliver an enhanced requirement with lower cost, complexity, and potentially before the RIIO-3 requirements come in.

In particular, we see strong alignment between the proposals set out in this consultation and Ofgem's wider work on enhancing Distribution Network Operator asset visibility. Improved, interoperable visibility of low-carbon technologies and associated network assets is a critical enabler of effective co-ordination, planning and targeted delivery. ElectraLink is actively working with DNOs to explore how a centralised, interoperable approach to asset visibility could support these objectives, complementing DNO-specific solutions while reducing duplication and complexity across the sector.

ElectraLink is fully owned by the DNOs and has a history of discharging DNO data obligations as we have with the DTS for over 25 years. This makes us the ideal candidate to help fulfil these potential new co-ordination obligations on behalf of the DNOs while increasing interoperability and enhancing LCT rollout effectiveness.

We would be delighted to discuss our response and views in more detail. Please contact dan.hopkinson@electralink.co.uk for further information.

Yours sincerely,

Dan Hopkinson,
CEO



Question 1:

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?

ElectraLink believes that DNOs have a key role in co-ordinating and supporting a cost-effective energy transition to LCTs. They will need to understand where and which LCT is installed, supporting networks where required to ensure that LCTs are fully effective. Additionally, their data and networks are essential to ensure that LCT can take advantage of key improvements in flexibility markets, ensuring that they are cost effective investments for consumers.

To ensure an efficient transition, a key enabler for improvement is to make sure that DNO data on LCT assets and other network data is shared in a fully interoperable manner – guaranteeing that a variety of market participants have access. The more data that is shared in this fashion – while ensuring that consumers and other market participants are protected, the smoother and more cost-effective the transition will be.

This not only requires access to high-level deployment data, but consistent and timely visibility of LCT and related network assets at scale. Improving asset visibility, particularly at low voltage, enables DNOs to plan interventions more efficiently, target flexibility opportunities, and avoid unnecessary reinforcement. A co-ordinated, interoperable approach to asset visibility therefore underpins the cost-effective delivery of LCTs and the realisation of system benefits.

Question 2:

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

ElectraLink agrees with the overall rationale and scope of Enhanced Co-ordination. We believe that DNOs must coordinate data to ensure that coverage is complete and maximum value for the system, end consumer and DNOs can be gleaned. We also consider Enhanced Co-ordination to be closely linked to Ofgem's work on enhancing DNO asset visibility. Strengthening data sharing, interoperability and system-wide views of assets support more effective collaboration between DNOs, local authorities, innovators and system planners, and reduces the risk of fragmented or inconsistent approaches emerging across GB.

ElectraLink is fully owned by the DNOs and has a history of discharging DNO data obligations as we have with the DTS for over 25 years. We believe that this experience and unique position within the market can help the DNOs co-ordinate effectively on data sharing, and that our technical experience can be used to deliver this co-ordination faster than even the RIIO 3 price control. We expand further on this in Question 5.

Question 4:

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

ElectraLink believes that the data currently published by the DNOs is useful and presented adequately, but that there can be significant improvements through the interoperable publishing of datasets through unified portals and with additional datasets layered.

Question 5:

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 agree with the proposal to publish additional datasets as part of a strengthened system visualisation interface requirement. We believe that datasets such as EPC data and socioeconomic data are key to layer with other datasets from DNOs to enable the rollout of LCT and support innovators and enable DNO operations. We also believe that mapping and insight into these layered datasets is another large step forward to supporting the LCT rollout effectively, as well as supporting currently installed LCT. Doing this in one platform – with the ability to map and compare data in an interoperable fashion will be a huge step forward. ElectraLink has our EMPRIS solution to share data from all DNOs in one place, alongside our NZDE solution to allow for mapping and insight generation, which we believe could build the foundations to discharge this potential obligation in an interoperable, unified way across the DNOs.

EMPRIS:

EMPRIS stores metering, consumption, embedded capacity, and low carbon technology data, totalling over 145 billion rows. Used by Ofgem and the Government for policy decisions, it covers 26 million households, 2 million microbusinesses and SMEs, and all electricity smart meters. EMPRIS is designed for security, privacy, and resilience, using AWS best practices like encryption, multi-factor authentication, fine-grained access controls, and automated backups to ensure confidence in data protection.

NZDE:

To support interoperable publishing and sharing, a geo-spatial solution—Net-Zero Data Explorer—has been developed for enhanced asset analysis. It enables users to ingest, store, govern, and share data with interactive geospatial visualization, allowing quick identification of insights across Great Britain, with strong data security. This enables:

- Discovery and awareness: highlighting patterns and trends not found in standard reports.
- Benchmarking and comparison: revealing regional performance differences.
- Evidence and storytelling: offering reliable visual references for planning and decision-making.

This approach has the potential to accelerate delivery, reduce duplication of effort across DNOs, and ensure that improvements in asset visibility translate directly into better co-ordination, planning and consumer outcomes. In summary, the benefits of our solution are:

- Reduce complexity: Our solution will significantly reduce complexity for the DNOs, as we will create a centralised platform that ingests the data from their systems, without the need to make significant changes to their existing internal asset registers. We already have the experience of ingesting data from the DNOs, connecting to their individual internal systems, without the need for significant adjustments.
- Reduce costs: ElectraLink has experience in integration with the DNOs' internal systems, evidenced through projects we have already carried out, including Fractal Flow and our work on the AAR Project with DESNZ. We have experience of streamlined integration processes for energy data and of ingesting multiple adjacent data sets from different sources and storing them in an interoperable manner. This will reduce costs for DNOs as they will not have to fully rearchitect their own internal asset registers.
- Provide robust governance: ElectraLink are experts in energy data governance, proven through our 25 years of data governance through the DTS. We have experience making energy data to as many industry participants as possible through the Data Transfer Services Agreement.
- Deliver against the licence condition: ElectraLink can be directly controlled by the DNOs, who will have a licence condition to ensure that the new service is delivered according to the standards required to support the industry. This arrangement has led to the strong delivery of the DTS.