

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

Energy Saving Trust written response: 2 April 2026

About Energy Saving Trust

Energy Saving Trust is an independent organisation dedicated to promoting energy efficiency, low carbon transport and sustainable energy use to address the climate emergency.

Our work focuses on reaching net zero by taking action to reduce energy consumption, installing new infrastructure and accelerating sustainable, low carbon lifestyles.

A trusted, independent voice, we have over 30 years' sector experience. We provide leadership and expertise to deliver the benefits of achieving carbon reduction targets: warmer homes, cleaner air, healthier populations, a resilient economy and a stable climate.

We empower householders to make better choices, deliver transformative programmes and support businesses and community groups with strategy, research and assurance – enabling everyone to play their part in building a sustainable future.

Our response:

Overarching rationale

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?

Energy Saving Trust agrees that DNOs should play a role in co-ordinating and supporting a cost-effective energy transition through improved planning and supporting targeted delivery. Given their regional presence within the energy system and that they stand to benefit from increased rollout, DNOs are well placed to ensure a more strategic rollout of low carbon technologies (LCTs) and energy efficiency (EE) in homes.

We also think DNOs are well-placed to support lower-income households which goes beyond the support some already provide.

Enhanced Co-ordination

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

We agree with the overall rationale and scope of 'Enhanced Co-ordination'. This aligns with where DNOs themselves increasingly see their role and interest in the system, whilst encouraging more joined-up, shared thinking and planning between existing actors and bodies. Enhanced Co-ordination will also help to bring DNOs closer to net zero targets and align their priorities with those of local and national governments.

Enhanced Coordination offers a low risk, high impact route for DNOs to deliver system benefits primarily through planning, sequencing and integration, while also enabling proportionate, partnership-based support for vulnerable households where this builds on existing delivery models and remains within licence boundaries. This is an area where Energy Saving Trust may be able to support DNOs by bridging the capacity gap and providing our sectoral expertise.

3. 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?

While the existing Collaboration Plans are helpful, they are currently too process -focused and we therefore support the proposal to create Community Collaboration Plans.

Strengthening the Plans to include proactive stakeholder identification and planned engagements in the year ahead will materially improve their transparency and accountability. We also support DNOs showing where their network planning has changed as a result of engagement to demonstrate the quality of the engagement and how decisions are informed and evidenced.

Monitoring of the Plans should focus more on assessing whether stakeholder engagement is informing decisions, improving coordination and producing usable outputs and move away from a tick-box approach to engagement.

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

Whilst data currently published by DNOs is valuable, it can often be difficult for local stakeholders to interpret or use. In our view, the biggest gap is not more data, but integration and context, so combining network data with non-network datasets (e.g. EPCs, socio-economic data, heat network zones, social housing locations) would significantly improve usefulness.

We also think it would be useful for DNO-held data and other datasets to be presented in alternative formats (e.g. maps), instead of raw datasets.

We would also encourage the publication of information around any synthetic or modelled data to ensure transparency around the data's accuracy and integrity. It is also helpful for onward interpretation, especially for any aggregated data. In relation to aggregation, we also recommend that regional diversity is taken into account to more accurately reflect the landscape of particular regions, especially when considering non-network datasets such as socio-economic data. Larger aggregations can sometimes cause misleading interpretations of the data and result in an inadequate representation of a use case.

We are pleased to see interoperability as an important value, and believe this is also a key thing to consider for a data sharing platform. We also support the development of more innovative visualisation techniques such as dynamic maps, alongside interoperable and smart data.

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 strengthening the System Visualisation Interface requirement, as greater data-sharing will help with local planning, stronger network readiness and more effective collaboration.

We also support additional data being published, provided that a balance is struck between the volume and quality of data. Collating and publishing non-network datasets could add real value, as long as it supports place-based decisions and the roles and responsibilities for data

stewardship are clear. Priority should also be given to datasets that support sequencing, siting and timing.

As mentioned in our response to Question 4, it's also important to ensure appropriate levels of aggregation of the data to ensure real world diversity is accurately captured, i.e. data is not aggregated to such a high extent that 'on-the-ground' nuances that are vital to understand are otherwise lost. This is particularly key for accurate place-based decision making.

We encourage the incorporation of smart data assets where possible within the System Visualisation Interface. We also see contextual high-level insights, such as fuel poverty and health metrics, as a great asset within the interface to curate a clearer picture of the needs and current state of the network.

Energy Saving Trust can support through our deep understanding of sectoral data and insights, as well as our experience in designing and developing digital tools in this area.

6. 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?

It will be crucial for DNOs to work closely with local authorities to ensure a holistic and integrated approach is taken when developing and delivering local decarbonisation plans. We therefore support the proposals for DNOs to build on elements of the Smart Optimisation Output (SOO) to offer further support to local authorities in their network area. The proposals broadly align with Enhanced Coordination role and the recent publication of the Warm Homes Plan and the Local Power Plan which signal an increase in the volume and pace of area-based activity.

Whilst the exact remit of the Warm Homes Agency is still to be defined, the Warm Homes Plan outlines the Agency's role in giving capability support to local authorities, such as through advice, but there is likely to be a key gap in data. This is where DNO's data will be important to local authorities to support network specific enablement, e.g. constraints, capacity, timing, sequencing and where flexibility or alternative approaches are viable. We therefore think there is an important role for trusted, independent organisations to work with DNOs to translate network intelligence into tools, artefacts and targeted advice that the WHA, local authorities and delivery partners can use. The value is not DNOs creating parallel advice services but ensuring that advice and delivery are grounded in network reality and don't create false expectations or rework.

We would also highlight the importance of having neutral actors to support integration between DNOs and local authorities to ensure outcomes are consumer-centric, particularly as local authorities often lack the capacity and resources to engage well with DNOs.

7. 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?

No response.

8. 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?

Strong alignment between the proposed Enhanced Co-ordination activities and NESO's RESP processes will be very important to ensure they complement each other, rather than duplicate. The key will be to ensure that local-level insights feed into regional planning, and vice versa, through consistent, auditable methods.

Care will also be needed to avoid multiple overlapping planning products with unclear status.

Expanded Role

9. 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?

Whilst Energy Saving Trust is open to DNOs adopting an Expanded Role in deploying LCTs and EE measures, we are also cautious and would suggest that the role is well-defined to ensure DNOs inform rather than decide on where LCTs and EE measures are deployed. This is particularly important for low-income households to ensure that LCTs are only installed in homes if suitable for their circumstances and not just if it is seen as beneficial for the network.

Whilst moving DNOs into full delivery or asset ownership carries regulatory and operational risk, there is scope to explore expanded consumer support and partnership-based models that complement enhanced coordination and remain proportionate.

10. 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?

Whilst using a network benefit and wider system benefits approach is sensible in principle, these benefits need to be clearly evidenced and auditable, particularly where consumer, community or distributional impacts are claimed.

Care is also needed to ensure assumptions are not made about the benefits that flow from expanded roles and that both the positive and negative impacts that come from an Expanded Role are also considered so that any unintended consequences can be mitigated.

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

Of the archetypes presented in the consultation, we would be supportive of 'Laying the Groundwork' and 'Widening Participation'.

However, the 'Focused intervention' archetype presents some challenging questions about who pays/benefits from home upgrades and how the costs of these are spread, especially if DNOs have control over the targeting and prioritisation of properties based on network or system benefits. We recognise that as the cost of any LCT and EE would be socialised on bills, there

may be limits to the extent to which this approach can be deployed where the network or system benefit needs to net off these costs so that it does not increase pressure on bills – i.e. where the cost of an avoided upgrade is greater than the deployment of the energy efficiency spend.

Do you have any evidence on key components notably:

- **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?**

No response.

- **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 placed to perform these functions?**

As recognised in DNO's Enhanced Co-ordination role, they are well placed to support the proactive identification of suitable properties and areas through network data, constraints, clustering analysis and place-based insights. This would be strengthened further by the proposals to improve available datasets in Question 5.

There is scope for targeted, proportionate consumer engagement delivered by DNOs or through trusted partners, particularly where it: reduces failed or mis-timed installations; improves take-up in priority locations; supports system outcomes (e.g. flexibility, load management, resilience).

Other actors (local authorities, delivery bodies, suppliers and community organisations) remain central to end-to-end delivery, with DNOs adding value by enabling and aligning engagement through clear signals on capacity, timing, constraints and readiness.

A partnership led model, combining DNO system insight with specialist advice, digital and marketing capability, offers a pragmatic route to improving the consumer journey without blurring licence boundaries.

- **On the potential funding approaches and implications: what are your views on the feasibility, or risks from these approaches; do you have evidence from other sources that is relevant to these considerations?**

Funding models that place full delivery or asset risk with DNOs carry challenges; however, blended and coordinated funding approaches could add value where DNOs contribute planning intelligence, system enablement and targeted consumer support.

There is scope to explore models where DNO funding supports: place-based readiness; coordination and sequencing; data, digital tools and consumer engagement, rather than physical installations.

Pilots are essential to test the feasibility, value for money and risk profile of different funding approaches before wider roll-out. Evidence from pilots should inform how funding mechanisms can best support system efficiency, consumer outcomes and delivery confidence, while remaining proportionate and within regulatory expectations.

- **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?**

We echo the stakeholder views referenced in the consultation that don't support DNOs directly installing measures in homes and would therefore be more supportive of a model where DNOs are responsible for ensuring the installation of LCT and EE measures, while the physical installation is undertaken by third party installers, as suggested in the consultation. Overall, we support the emphasis on ensuring good consumer outcomes when thinking about the best approach.

- **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?**

No response.

12. 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?

We think running pilots would be valuable but should be tightly scoped. Pilots that test coordination models, validate evidence and decision frameworks and seek to understand regulatory friction should be prioritised.

We think a pilot, proof and scale approach is preferable to widescale early experimentation.

13. How could DNOs support the proposals in this portion of the consultation?

No response.