

Overarching rationale

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?

GMCA lead strategic place-based coordination across Greater Manchester through linking our retrofit activity within our wider energy planning, investment pipeline, Good Growth Strategy, and Housing First and Live Well agendas – including measures such as our Integrated Settlement Warm Homes delivery for social housing and local grant, Feel the Benefit Retrofit Portal, Retrofit Advice and Assessment Service, building on previous schemes such as the ECO LA Flex, Local Energy Advice Demonstrator and the creation of LAEPs.

We engage with and welcome continued DNO support in this function but would recommend that DNOs are not the coordinating bodies where such mature services already exist.

DNOs have much greater network insights than GMCA or other LAs currently possess, and so we would welcome a continuation of activity working to provide actionable insights to local government. One area that could be improved on is greater visibility over vulnerable residents and those at risk of fuel poverty. Many grant schemes rely on individuals self-referring, and it may be that DNOs have the intelligence to identify vulnerable residents that can be proactively targeted for grant schemes or other local support services. In addition, ongoing monitoring of vulnerable residents post-installation could help us to identify and flag residents at risk of fuel poverty. Building models to share this data, in a safe and compliant manner, would help to ensure our most at-risk residents are not left behind by the energy transition.

DNOs may also be able to provide unique insights based on their energy data in order to suggest optimal LCTs at a more granular scale and could identify flexibility potential. We would welcome an approach which explores how we might utilise this intelligence.

GMCA have been working hard to convene providers and local supply chains for retrofit and LCTs. We would welcome coordinated efforts with DNOs to signpost residents to our services. Further work needs to be undertaken to explore effective ways of working where alignment is natural and efficient. One example would be coordinating proactive de-looping of homes in areas where GMCA plan to deploy area-based Warm Homes funding. DNOs and GMCA could coordinate on an engagement campaign that educates residents, is clear on the benefits of the disruption they may experience, and ensure residents feel empowered to participate. De-looping in advance of area-based retrofit works will benefit the delivery of our grant schemes and reduce delays, whilst coordinated messaging between two trusted organisations will improve resident

confidence. Enabling efficient area-based delivery could also open up the potential for localised group-buying schemes, delivering further savings to residents and which could be administered through our existing retrofit portal.

Enhanced Co-ordination

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

The proposals suggest that DNOs should be the coordinating function behind LCT delivery. However, this should only be the approach where there are no existing, mature LCT delivery services, such as those provided by GMCA and many other local authorities. Supporting these existing partnerships should be a priority where they already exist.

We recognise the role DNOs have to play building on better data and insight exchange, and to explore how this can be better shared with partners.

We agree that DNOs can act as a trusted source of energy network information, but should also assist LAs and delivery bodies build their own capabilities in energy data management and modelling.

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?

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

SP ENW currently make available a large amount of energy data across different scenarios and use cases. However, there is arguably a relatively high level of familiarity with energy data required to make best use of this offer. SP ENW are currently exploring more user-friendly and accessible tools for stakeholders, including the rollout of energy modelling tools for LAs and CAs such as LAEP+, which assist in presenting energy data in a usable format.

GMCA will continue to work alongside SP ENW to communicate our energy data needs, to assist both low carbon technology deployment and ensure forward planning of our development requirements through the Integrated Pipeline are embedded within regional DSO and NESO planning.

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?

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 have an established working relationship with SP ENW and meet bi-weekly to collaborate on shared priorities and co-develop projects and strategies. We utilise a shared energy planning spreadsheet to record actions to date and for forward planning of those projects and work areas which overlap and require input from ourselves and the DNO. We have discussed already how the online tools that the DNO provides could be made more useful for the purposes of energy planning for growth locations in Greater Manchester and would welcome regulatory requirements to support this.

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?

Local Energy Markets could provide a powerful tool to improve local renewable generation and consumption, expand flexibility availability and reduce costs of the energy transition. Enabling private-wire properties to export generation on a local level could be an important element of DSOs increasing local flexibility.

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?

This question highlights a broader question. Ofgem should require meaningful and evidence-based engagement with Mayoral Combined Authorities from both the NESO and DNO/DSO as this directly impact on growth/delivery and cross government objectives.

As an example. The Greater Manchester Combined Authority and SP ENW have partnered for over a decade to advance growth, decarbonisation, and resilient infrastructure, coordinated through the Strategic Infrastructure Board (SIB), chaired by Peter Emery since 2019.

SP ENW's 2023–2028 ED2 business plan supports Greater Manchester's key priorities, with GMCA backing regulatory engagement. As complexity increases and new ties to NESO emerge, SP ENW is preparing its next plan.

The Greater Manchester Strategy Delivery Plan (December, 2025) includes metrics specific to the SIB. These are:

- By 2030 have mature partnerships around infrastructure with providers, economic and environmental regulators, national government and regional entities.
- Year 1 (by end March 26): Priorities aligned to GMS agreed with targeted government departments, economic regulators and regulated infrastructure providers.
- Year 4 (by end March 2029): Infrastructure Plan to support the 10 Year Delivery Plan, the Spatial Development Strategy and leverage private capital.
- Year 10 (by end March 2035): Investment leveraged through two utility price review cycles and aligned to the priorities of Greater Manchester infrastructure providers, economic and environmental regulators, national government and regional entities.

Through the leadership of the Board's chair, the Board's role has continued to evolve. The SIB now provides coordinated, evidence-led engagement with government departments, economic regulators and infrastructure providers, ensuring that Greater Manchester's strategic priorities are reflected in investment cycles, policy reform and delivery programmes.

Further information on the progress report (and priorities such as social value and working with Ofgem/NESO etc) is available [here](https://democracy.greatermanchester-ca.gov.uk/documents/s42917/SIB%20Annual%20Review%202025_26%20March%2026%20FINAL%20ISSUE.pdf):
https://democracy.greatermanchester-ca.gov.uk/documents/s42917/SIB%20Annual%20Review%202025_26%20March%2026%20FINAL%20ISSUE.pdf

We would like to draw Ofgem's attention to the page 11 (maturity status) as this assesses members against several collaboration maturity matrix as an example to explore further.

Expanded Role

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 lowincome households?

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?

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:

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?

Funding to support properties coming off gas during ASHP installation (e.g. contributing to induction hob replacement for gas hob) will make best use of tradespeople on site and minimise disruption, will require coordination between installation and energy suppliers, will futureproof these properties and will realise the cost savings for residents by avoiding gas standing charges (~£120pa). Research indicates that fully electrifying homes and switching to a smart tariff, are essential for ASHPs to provide a modest running cost saving over gas boilers, rather than slightly higher running costs. Supporting residents to achieve bills savings is critical to the wider uptake of low carbon technologies and decarbonising domestic heating.

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?

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?

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 have limited experience in delivering retrofit and LCT installations, and likely to do not have the internal capacity and so would rely on partnerships with the private sector. DNOs would have to learn from some of the failures of other national retrofit delivery schemes around quality control and post-installation monitoring. GMCA and other authorities have also begun to manage their own local supply chains, such as through GMCA's Net Zero Housing Retrofit Framework, which would be well-placed to deliver additional retrofit and LCT installations. Partnering with existing trusted delivery

mechanisms could provide a more effective and readily-deployed service, and would lower the risk of duplication of efforts and messaging.

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?

Funded LCT would need to retain flexibility capabilities through agreement with the delivery partner.

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?

Pilots should include full home electrification coordinated with area-based delooping. How long the project takes will need to be carefully considered as the resident engagement piece will require significant time and resource investment in its infancy.

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