



Green Generation Energy Networks Cymru
Hodge House
Guildhall Place
Cardiff
CF10 1DY

Fiona.Morrison@greengencymru.com

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By Email: DNOLCTPolicy@ofgem.gov.uk

Dear Jack

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

We welcome the opportunity to respond to the above consultation. Green Generation Energy Networks Cymru (Green GEN) is an IDNO developing the UK's largest linear distribution network; over 300km of new 132kV distribution grid network infrastructure, across Wales, which will connect to the transmission network, rather than the traditional model of a smaller "last mile" connection from a distribution network.

We recognise that DNOs have laid a solid foundation in ED2 in their co-ordination role. We would be pleased for IDNOs to be identified as key stakeholders going forward and are keen to engage with the DNOs on this basis.

IDNOs provide an often bespoke service to developers, working to offer agile solutions at pace, to enable the growth that is needed to support net-zero goals. The skills and insight which IDNOs can offer should not be overlooked, however at this time we do not believe that there should be an expanded role for either DNOs or IDNOs in this space.

We look forward to further engagement on this work.

Yours sincerely

Fiona Morrison
Head of Regulation



Annex 1 - Response to Questions

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?

DNOs are well placed to facilitate and support enhanced data sharing and to contribute to local planning and we understand that DNOs are already making significant efforts towards this goal. And while we support the intention behind expanding delivery in this area, it is not evident that DNOs are the appropriate parties to take on the full scope of these activities. The energy-efficiency (EE) and low-carbon technology (LCT) market already includes established, competent providers, and introducing DNOs in a more prominent delivery role risks duplication, blurred responsibilities, and confusion for consumers and stakeholders.

Enhanced Co-ordination

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?

We understand the purpose of Enhanced Co-ordination is to accelerate deployment and ensure activities across households, local authorities, suppliers, and the supply chain are better aligned. We believe that IDNOs should be recognised as a stakeholder to the Community Collaboration Plan. IDNOs provide a tailored service to developers, working with them to provide solutions to enable projects, many of which support LCT and EE goals. IDNOs are essential in the energy system to enable growth that supports net zero goals in a timely fashion, at a time when we require a more dynamic and innovative approach to network provision.

IDNOs can also support Enhanced Coordination by providing flexible, low-carbon-ready infrastructure that integrates local generation, storage, and heat solutions. We can also participate in coordinated data sharing, consistent technical standards, and early engagement on capacity needs, contributing to whole-system optimisation.

Expanded Role

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

We note that Ofgem's ambition for this role is that it should "supplement rather than replace" (page 27) the existing supplier and installer-led market; and the stated need for "confidence that DNOs are well-placed to deliver [the activities] given the roles other actors already play or could play on in this space" (page 28).



For now, we are not in a position to demonstrate that those two ambition points are met. We foresee two risks associated with the proposal:

- a risk of distraction from core business since this would require upskilling efforts and growing a brand-new part of our business; and
- a risk of financial over-reach (with networks effectively acting as banks in the Focused Intervention scenario).

We are looking forward to stakeholders' input on the matter to help us develop our opinion further.