

2028/29 DUoS Charge Setting

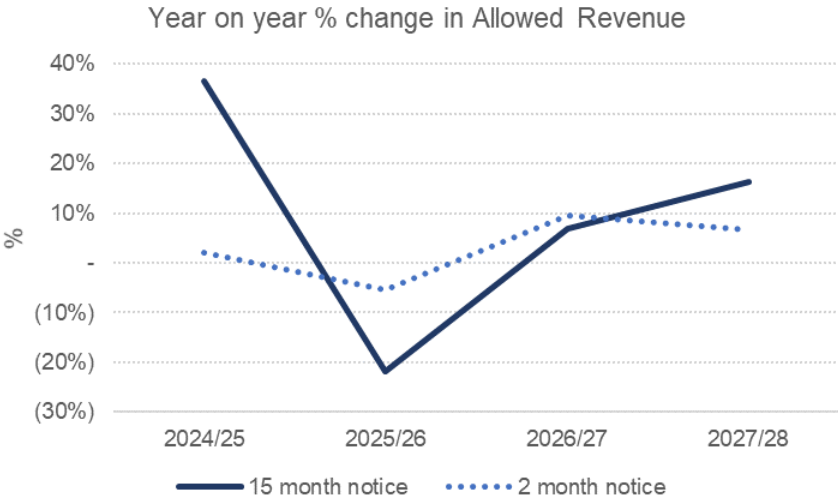
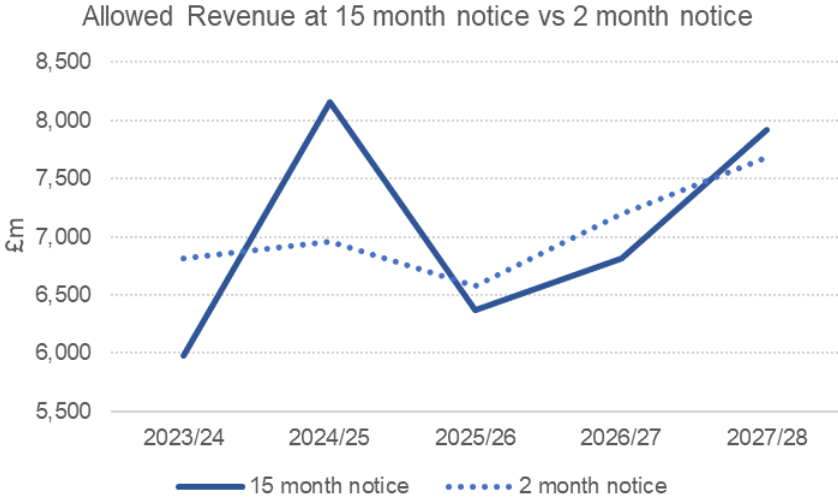
01 May 2026

- A build on previous discussions, aiming to address Ofgem's specific asks.
- Specify a "problem statement".
- Retrospective look at sector level ED2 Allowed Revenues based on 15-month vs 2-month notice periods.
- Context on scale and stability of DUoS within energy bills.
- Discussion points on the rejected request for derogation coming into ED2.
- An assessment of viable options for a charge notice derogation with reference to key ED3 decision points, and other factors that have a bearing on allowed revenue certainty and deliverability.
- An appraisal of four identified options against qualitative pros and cons, and assessment criteria based on key factors having a bearing on allowed revenue uncertainty risk.
- Delivery and communication timelines for the DNO preferred option.
- Additional considerations.
- Summary of key points.

- Electricity DNOs are currently required to provide 15 months advance notice of DUoS charges.
- At the point of charge setting, DNOs are in essence forecasting allowed revenue for three incomplete financial years: the current financial year, the financial year ahead, and the financial year to which the charges relate.
- Many factors affecting the allowed revenue forecast are beyond the control of DNOs, for instance, inflation, real price effects, risk free rate and cost of debt indexation, and variances in chargeable volumes. Furthermore, some areas of allowed revenue are challenging to objectively forecast as they are determined after the completion of a financial year (i.e. output delivery incentives).
- To the extent that actual positions and updated forecasts are different to the assumptions used at charge setting, the difference in allowed revenue rolls forwards into charge setting for the next period, inclusive of time value of money adjustments. This is therefore a source of year-on-year variability in allowed revenues, which is problematic for suppliers who seek predictability and stability in DUoS charges for the purposes of pricing for their own commercial tariffs.

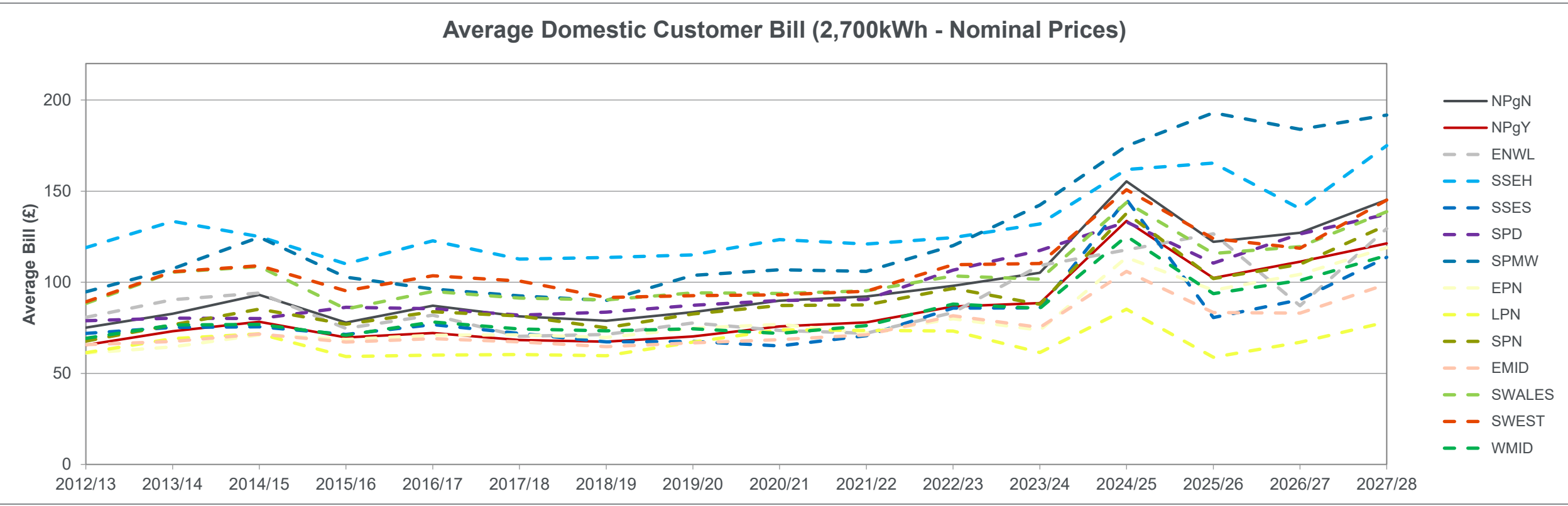
- The problem is exacerbated where charge setting straddles price control periods, because the price control review process involves review of funding and incentivisation mechanisms, rebasing DNO investment plans, redetermining the baseline allowed cost of capital, and reassessing affordability, investability and financeability. Setting DUoS charges with 15-months notice means that under normal circumstances, tariff setting in December 2026 will relate to the first year of RIIO-ED3 (2028/29), and made at a point where Authority decisions for the new price control are yet to be made, creating a high degree of uncertainty over allowed revenue forecasts.
- Via Energy Networks Association, DNOs have been exploring how deferral of charge setting for 2028/29 would improve the accuracy and reliability of underpinning allowed revenue forecasts, and minimise the downstream volatility created by uncertainty in allowed revenue building blocks. This is even more important in the context of the current cost-of-living crisis and geopolitical uncertainty.

Demonstrating the problem in practice



- The charts show RIIO-ED2 allowed revenue used at charge setting (15 months notice) against the outcome if charges had been set 12 months later (2 months notice), and the year on year % change in allowed revenue under each scenario.
- We observe a much flatter and stable allowed revenue profile if charges were set with 2 months notice.
- Although the volatility in the first two years of RIIO-ED2 was strongly influenced by the unprecedented swings in inflation experienced in the UK economy, uncertainty of price control review outcomes also played a role.
- The levels of risk at ED2 are still evident, if not increased, for ED3, given the current geopolitical and economic instability around the world.
- Charts include data for 13 out of 14 DNOs.

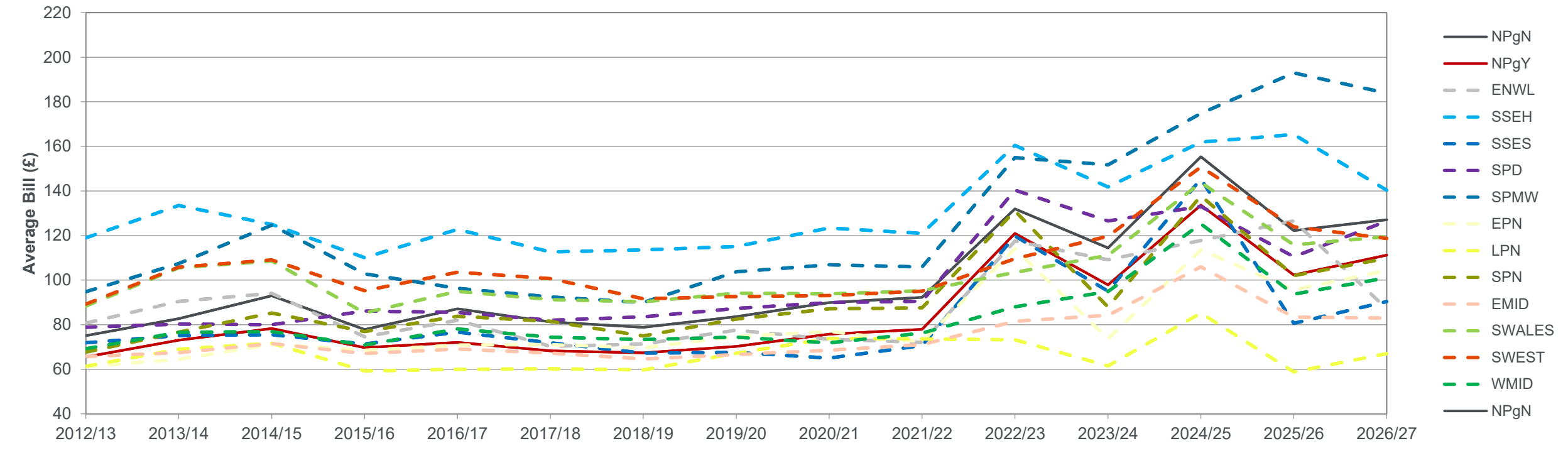
There was less price volatility at the start of ED1 than ED2 (1 of 4)



- We didn't have the same volatility in the path of prices at the start of ED1 (3-months' notice) that we had at the start of ED2 (15-months' notice).
- The ED2 period shows the same volatility that was included in slide 5.
- The analysis is based on DNO published tariffs.

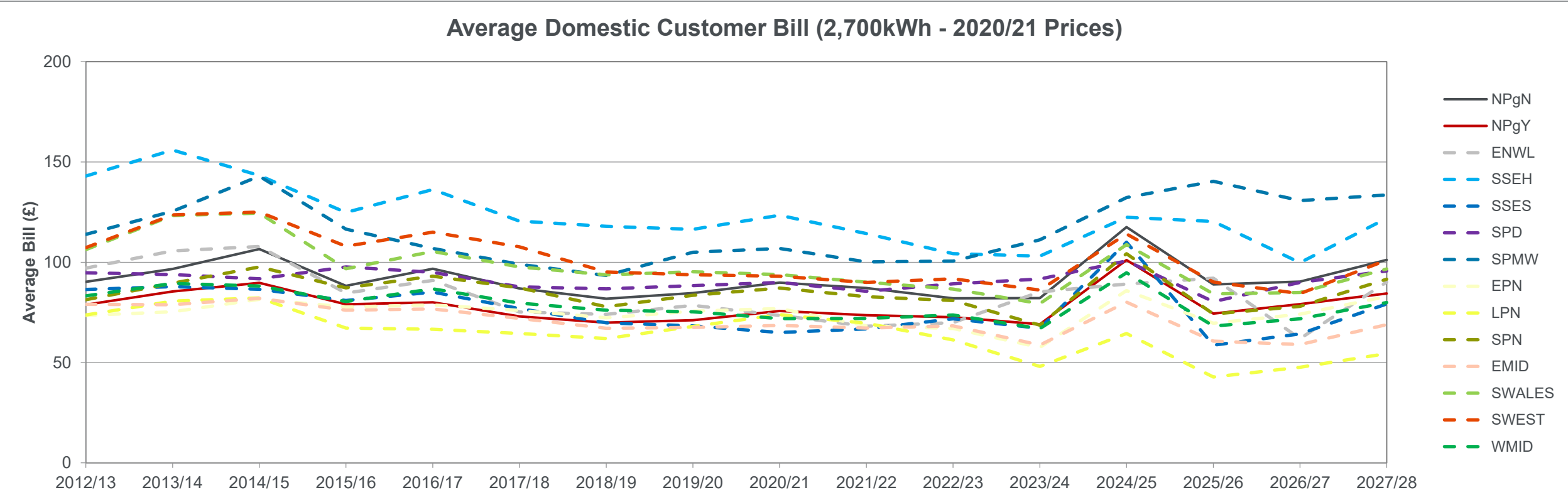
There was less price volatility at the start of ED1 than ED2 (2 of 4)

Average Domestic Customer Bill (2,700kWh - Nominal Prices) - Including SoLR



- Policy decisions such as SoLR has added additional volatility.

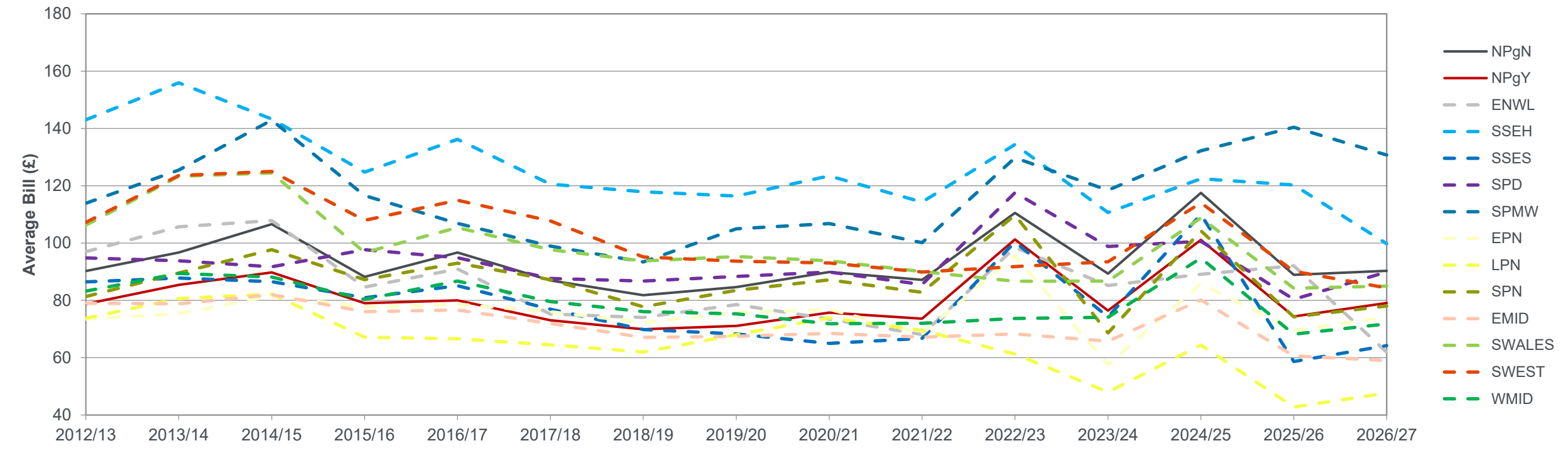
There was less price volatility at the start of ED1 than ED2 (3 of 4)



- We didn't have the same volatility in the path of prices at the start of ED1 (3-months' notice) that we had at the start of ED2 (15-months' notice).
- The ED2 period shows the same volatility that was included in slide 5.
- The analysis is based on DNO published tariffs.

There was less price volatility at the start of ED1 than ED2 (4 of 4)

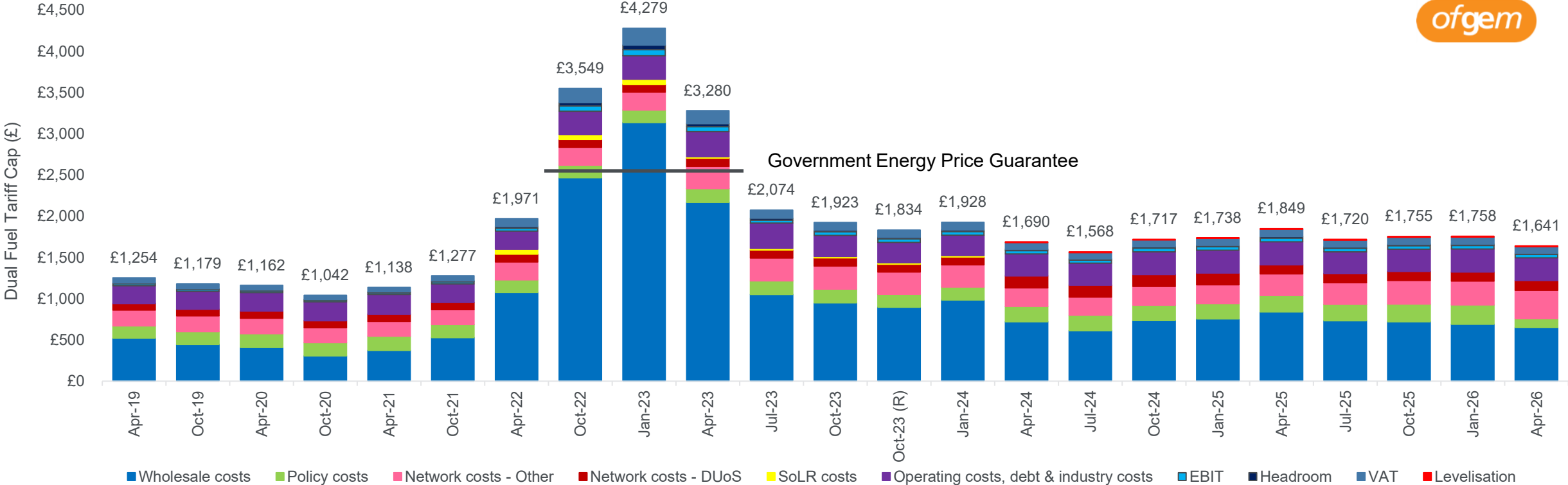
Average Domestic Customer Bill (2,700kWh - 2020/21 Prices) - Including SoLR



- Policy decisions such as SoLR has added additional volatility.

DUoS charges make up a small proportion of a dual fuel energy bill

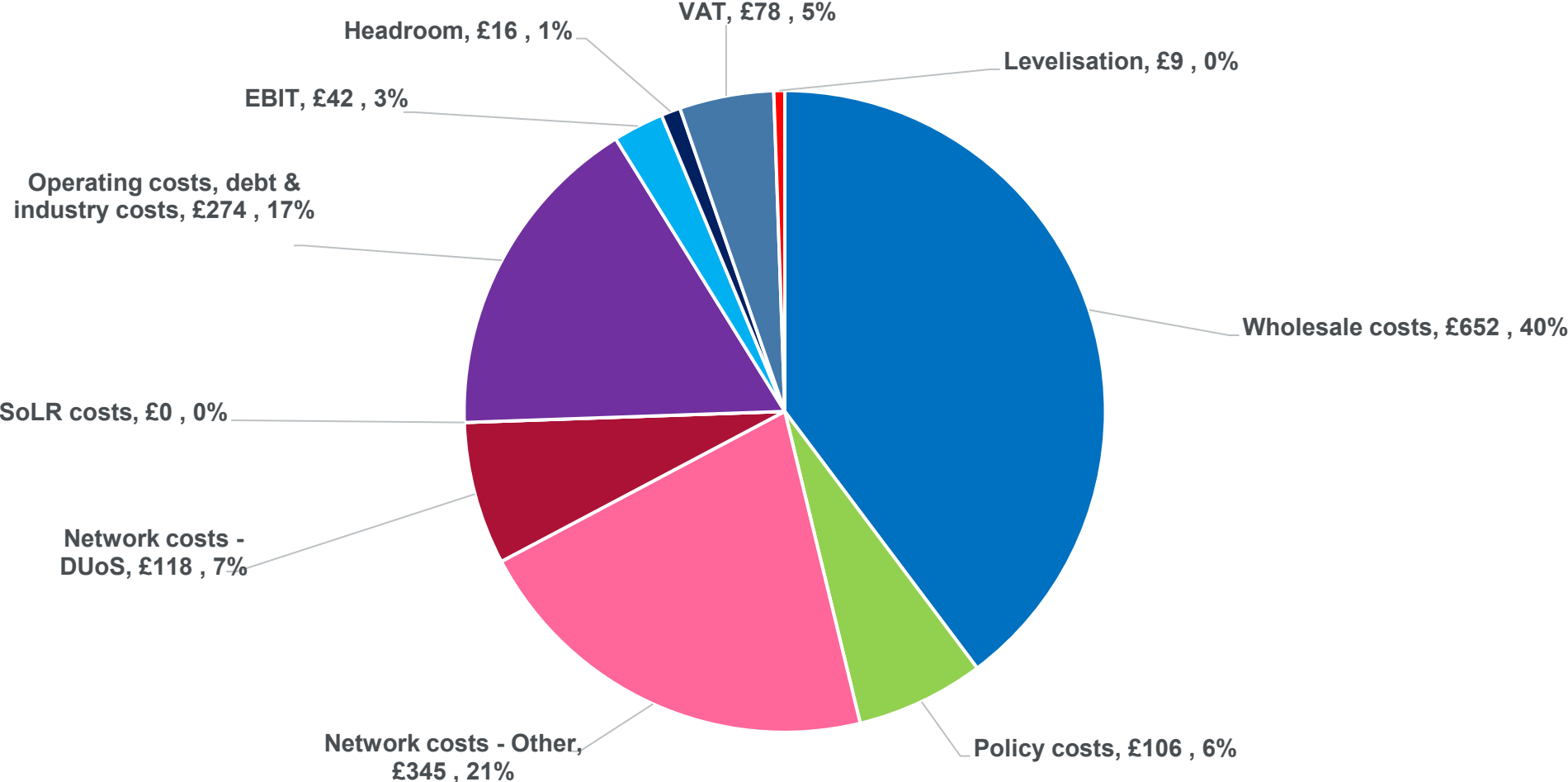
Breakdown of Ofgem's default dual fuel tariff cap components



- **DUoS costs are a small part of the overall UK dual fuel bill.** Whilst DUoS charges have remained relatively stable in recent years their proportion of the dual fuel energy bill has varied significantly (2% → 9%) dependent on the movement in wholesale prices. Currently around only 7%.
- Based on electricity bills only DUoS charges currently account for only circa 13% of the bill.
- A derogation to waive the 15-month notice would likely have a minor impact (circa +/- 1%) on the small DUoS element of a dual fuel bill.

Supplier charges are capped by the Ofgem Energy Price Cap

Ofgem April 2026 Energy Price Cap Breakdown – £1,641



- In 2021, Ofgem consulted on a request from DNOs for a temporary disapplication of the 15-month charge notification requirement
- Ofgem's decision at the time was to reject this request on the grounds that:
 - *Reducing the notice periods represents a transfer of risk from DNOs to suppliers and consumers*
 - *DNOs are better placed to manage forecasting risks associated with RIIO-ED2 than suppliers and consumers*

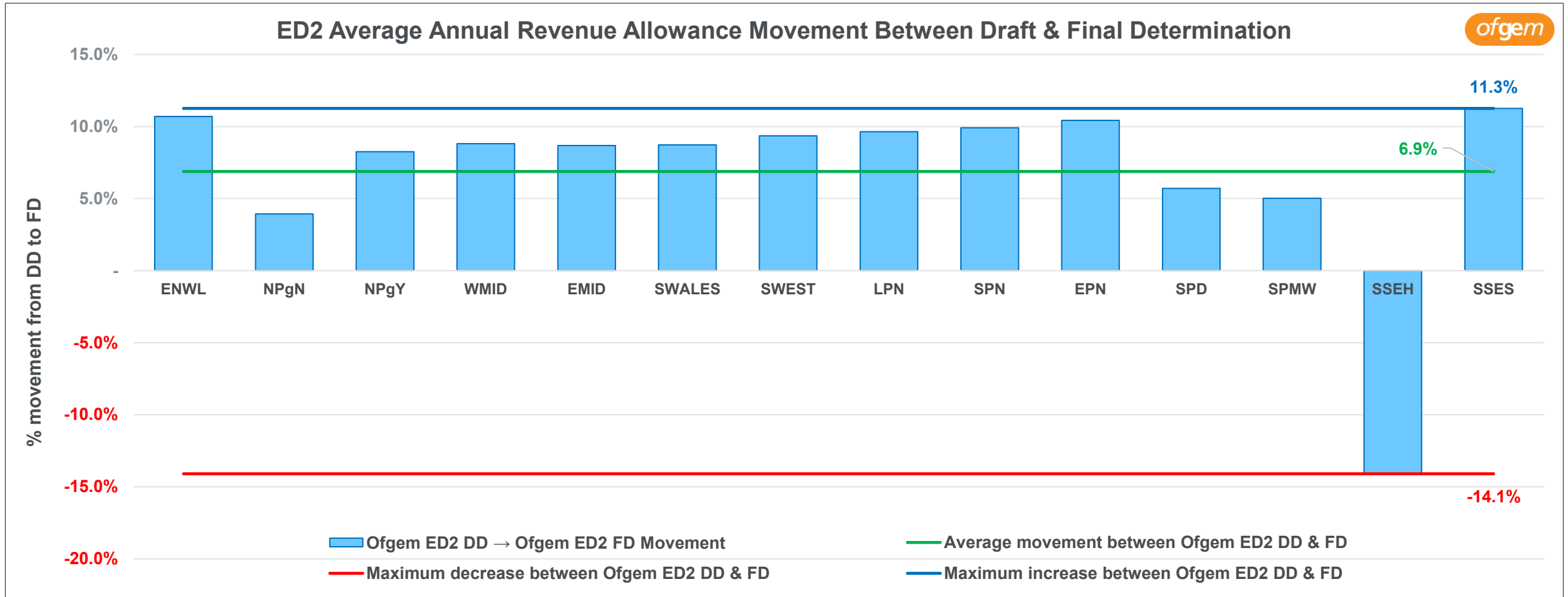
Discussion points

- With the benefit of hindsight, we can observe that the 15-month notice implementation did not shield suppliers and consumers from allowed revenue volatility risk (see slide 2).
- As slides 6 and 7 demonstrate, DUoS charges represent a relatively small and stable proportion of energy bills.
- Since the implementation of the 15-month notice periods, the competitive landscape has evolved, we see history repeating in terms of economic uncertainty coming into the next price control, and the affordability challenge intensifying against a backdrop of Net Zero mobilisation, and increased in-flight uncertainty in Allowed Revenues.

Discussion points (cont.)

- Ofgem's position on implementation of DPC178 (the code mod which introduced the 15-month requirement), was that implementation should be deferred from Nov-14 to Nov-15 given the degree of uncertainty over final allowed revenues.
- There have been historical instances where charges have been re-published to accommodate the implementation of policy initiatives (e.g. Supplier of Last Resort) and it is possible this may be required again within the planning horizon (e.g. Debt Relief Scheme)
- The RIIO framework includes time value of money adjustments on the correction term making DNOs financially neutral to upward and downward revenue timing adjustments. This being the case, is there truly a transfer at risk at play? Indeed the intention of exploring the 15-month derogation is to reduce revenue volatility risks to **suppliers and consumers**.

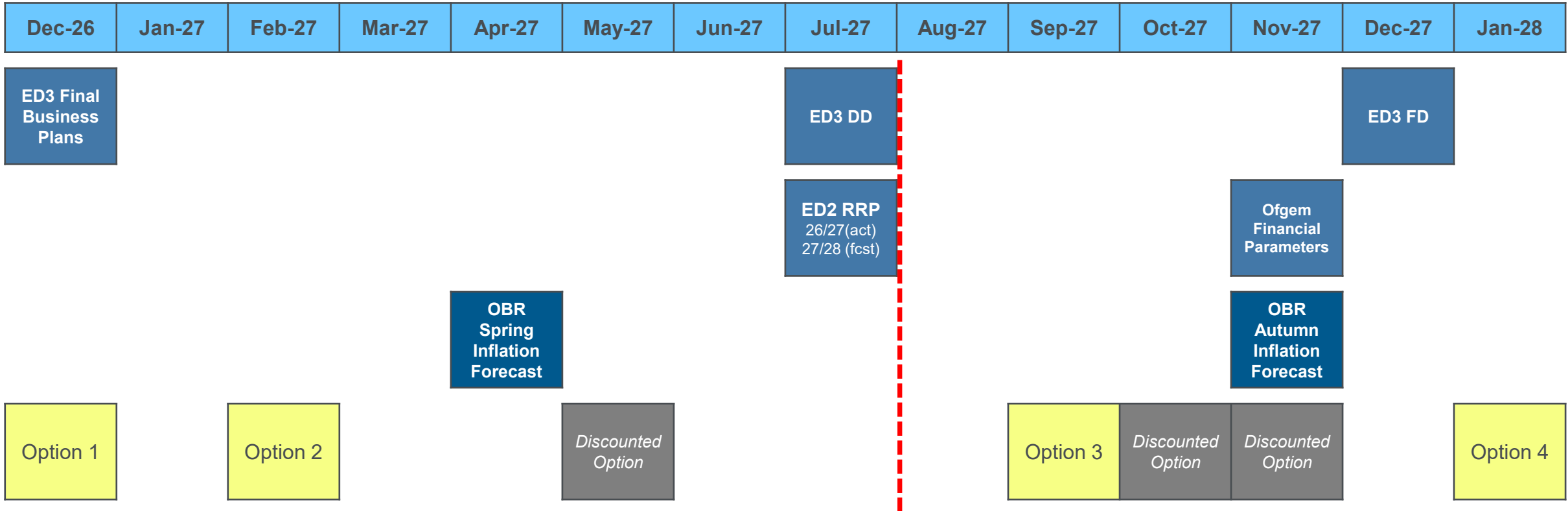
There were significant movements between Draft and Final ED2 Determinations



- There can be significant movement between the draft and final determinations. In ED2 the final determinations were on average 6.9% higher than the draft determinations with the maximum DNO increase being 11.1% and compared to the maximum reduction being 14.1%.

What are the options?

- As the objective is to improve accuracy and reliability in year 1 allowed revenue forecasts, the options are driven by the regulatory process timetable and the availability of better information...



- Additional options considered but discounted on basis of value add in proximity to major information updates (e.g. at May-27 would be preferable to wait for ED3 DD and ED2 RRP updates given the positive impact to Allowed Revenue certainty).
- Consensus amongst DNOs there is a natural “red line” for options post Jul-27 driven by information certainty & ED3 PCFM availability.

Option Assessment

#	Risk	Option 1	Option 2	Option 3	Option 4	Comment
	High	ED3Draft Business Plan Submission	ED3 Final Business Plan Submission	Ofgem ED3 Draft Determination	Ofgem ED3 Final Determination	
	Medium					
	Low					
1	ED3 Publication Date	Jul-26	Dec-26	Jul-27	Dec-27	Date at which the plan/determination would be available
2	Notice Period	15-months (Dec 2026)	13-month (Feb 2027)	6-Month (Sep 2027)	60-day (Jan 2028)	Option 1 normal notice period. Options 2, 3 and 4 assume 2-months required post publication to review information, undertake data assurance, obtain internal sign-off and prepare material for publication.
3	ED3 PCFM	X	X	✓	✓	We are assuming that Ofgem will publish an ED3 PCFM alongside the draft and final determinations. Prior to draft determination no ED3 PCFM will be available. Final PCFM should be most accurate.
4	OBR Inflation	Nov-26	Nov-26	Mar-27	Nov-27	More accurate OBR forecast can be used in option 4. This is more important given the current geopolitical uncertainty.
5	Competing Obligations	Standard	Standard	High	Standard	Option 3 has numerous competing regulatory obligations such as the SLC46 regulatory return, the Losses calculations and ED3 workload.
6	Uncertainty (Data Unavailability)	High	High	Medium	Lower	Data becomes more accurate and many unknowns become knowns in option 4. Options 1 and 2 are based on extremely limited data. Option 3 still has many unknowns that could be big movers on allowed revenues.
7	Tariff Volatility (ED3)	High	High	Medium	Lower	Setting tariffs on more accurate data should lead to lower under/over recoveries and provide more stable and predictable tariffs through the ED3 price control period. This also has the potential to reduce supplier risk premiums.
8	Industry Alignment	X	X	X	✓	Option 4 would align with on-going DCUSA change proposals (e.g., DCP 469) and standardise with other industry sectors (e.g., TNUoS).

#	Criteria	Why does this matter?	Scoring Definitions		
			Low Risk (1)	Medium Risk (2)	High Risk (3)
1	ED3 PCFM Maturity	An Ofgem developed PCFM provides a consistent calculative methodology on which to base allowed revenue.	Fully developed PCFM populated with Final Determinations outcomes	Substantially developed PCFM populated with Draft Determinations outcomes	No ED3 PCFM formally released, only draft WIP via Ofgem working groups.
2	Latest OBR forecasts	Allowed revenue highly sensitive to inflation assumption. More remote forecasts are less reliable	Accommodates autumn 2027 OBR inflation updates	Accommodates spring 2027 OBR inflation update	Does not accommodate any additional OBR information vs BAU (autumn 2026 OBR)
3	Competing Obligations	Charge setting is a complex process where precision and robust assurance are paramount. Coinciding with other major deliverables may introduce higher risk of error.	No process risk relative to BAU		Reduced process time and / or coincidence with other major deliverables creates high risk of material error
4	Uncertainty (Information Quality)	Allowed revenue accuracy is influenced by the extent to which it is based on Authority decision making.	Based on Final Determinations. 2026/27 Finalised. Strong view of 2027/28 performance outturn.	Based on Draft Determinations. 2026/27 Finalised. Limited view of 2027/28 performance outturn.	Based on SSMD and DNO Business Plans. Incomplete view of 2026/27 performance outturn. Forecast only view of 2027/28 performance outturn.
5	Tariff Volatility	Volatile tariffs are unhelpful to suppliers and end customers	Based on Final Determinations.	Based on Draft Determinations	Based on SSMD and DNO Business Plans
6	Industry Alignment (nb TNUoS and GDNs are 60 days)	Ofgem has encouraged DNOs to consider industry standardisation	Align with on-going DCUSA change proposals (e.g., DCP 469) and standardise with other industry sectors (e.g., TNUoS).		Not standardised with other industries

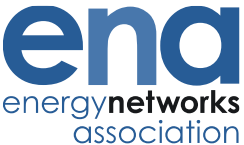
Option 4 – 2028/29 Charge setting and communication timeline

#	Description	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Jun-27	Jul-27	Aug-27	Sep-27	Oct-27	Nov-27	Dec-27	Jan-28	Feb-28	
Key milestones																						
1	DNO Business Plan submissions		◆ Draft				◆ Final															
2	Ofgem determinations													◆ Draft						◆ Final		
3	OBR inflation publications					◆ Autumn				◆ Spring									◆ Autumn			
4	2028/29 charge setting options						◆ Opt 1		◆ Opt 2								◆ Opt 3				◆ Opt 4	
Option 4 - Charge setting timeline																						
5	Gather Standard Charging Inputs (excluding allowed revenues)	→												→								
6	Dry Run – Charging Model Testing based on Ofgem Draft Determination														→							
7	Raise/resolve any potential modelling issues with Ofgem																→					
8	Calculate 2028/29 charges based on Ofgem Final Determination																			→		
9	Calculate 2029/30 charges based on Ofgem Final Determination																			→		
10	Publish final 2028/29 and 2029/30 charges																				◆	
Stakeholder communications																						
11	Ofgem determination														◆ Draft					◆ Final		
12	DNO Cost information Review Pack (CIRP) publications (Indicative charges)				◆		◆						◆				◆			◆		
12	Publication of final charges																				◆	

Option 3 – 2028/29 Charge setting and communication timeline

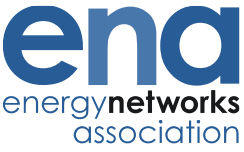
#	Description	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Jun-27	Jul-27	Aug-27	Sep-27	Oct-27	Nov-27	Dec-27	Jan-28	Feb-28	
Key milestones																						
1	DNO Business Plan submissions		◆ Draft				◆ Final															
2	Ofgem determinations													◆ Draft						◆ Final		
3	OBR inflation publications					◆ Autumn				◆ Spring									◆ Autumn			
4	2028/29 charge setting options						◆ Opt 1		◆ Opt 2								◆ Opt 3				◆ Opt 4	
Option 4 - Charge setting timeline																						
5	Gather Standard Charging Inputs (excluding allowed revenues)	→												→								
6	Dry Run – Charging Model Testing based on Ofgem Draft Determination	→																				
7	Raise/resolve any potential modelling issues with Ofgem	→																				
8	Calculate 2028/29 charges based on Ofgem Final Determination														→							
9	Calculate 2029/30 charges based on Ofgem Final Determination																			→		
10	Publish final 2028/29 and 2029/30 charges																◆				◆	
Stakeholder communications																						
11	Ofgem determination														◆ Draft					◆ Final		
12	DNO Cost information Review Pack (CIRP) publications (Indicative charges)			◆			◆						◆				◆			◆		
12	Publication of final charges																◆				◆	

Option 2 – 2028/29 Charge setting and communication timeline



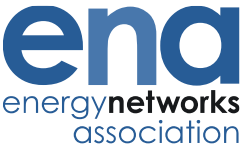
#	Description	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Jun-27	Jul-27	Aug-27	Sep-27	Oct-27	Nov-27	Dec-27	Jan-28	Feb-28	
Key milestones																						
1	DNO Business Plan submissions		◆ Draft				◆ Final															
2	Ofgem determinations													◆ Draft						◆ Final		
3	OBR inflation publications					◆ Autumn				◆ Spring									◆ Autumn			
4	2028/29 charge setting options						◆ Opt 1		◆ Opt 2								◆ Opt 3			◆ Opt 4		
Option 4 - Charge setting timeline																						
5	Gather Standard Charging Inputs (excluding allowed revenues)	→												→								
6	Dry Run – Charging Model Testing based on Ofgem Draft Determination	→																				
7	Raise/resolve any potential modelling issues with Ofgem	→																				
8	Calculate 2028/29 charges based on Ofgem Final Determination							→														
9	Calculate 2029/30 charges based on Ofgem Final Determination																			→		
10	Publish final 2028/29 and 2029/30 charges									◆											◆	
Stakeholder communications																						
11	Ofgem determination														◆ Draft					◆ Final		
12	DNO Cost information Review Pack (CIRP) publications (Indicative charges)				◆			◆						◆						◆		
12	Publication of final charges									◆											◆	

Option 1 – 2028/29 Charge setting and communication timeline



#	Description	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Jun-27	Jul-27	Aug-27	Sep-27	Oct-27	Nov-27	Dec-27	Jan-28	Feb-28	
Key milestones																						
1	DNO Business Plan submissions		◆ Draft				◆ Final															
2	Ofgem determinations													◆ Draft						◆ Final		
3	OBR inflation publications					◆ Autumn				◆ Spring									◆ Autumn			
4	2028/29 charge setting options						◆ Opt 1		◆ Opt 2								◆ Opt 3			◆ Opt 4		
Option 4 - Charge setting timeline																						
5	Gather Standard Charging Inputs (excluding allowed revenues)	→												→								
6	Dry Run – Charging Model Testing based on Ofgem Draft Determination	→																				
7	Raise/resolve any potential modelling issues with Ofgem	→																				
8	Calculate 2028/29 charges based on Ofgem Final Determination				→																	
9	Calculate 2029/30 charges based on Ofgem Final Determination																			→		
10	Publish final 2028/29 and 2029/30 charges						◆														◆	
Stakeholder communications																						
11	Ofgem determination														◆ Draft					◆ Final		
12	DNO Cost information Review Pack (CIRP) publications (Indicative charges)			◆			◆						◆				◆			◆		
12	Publication of final charges						◆														◆	

Options: Assumptions / Pros / Cons (1 of 2)



#	Option	Publication	Assumptions	Pros	Cons
1	Option 4	Jan-28	<ul style="list-style-type: none"> • 2028/29 and 2029/30 charges set based on Ofgem's Final Determinations 	<ul style="list-style-type: none"> • All information available <ul style="list-style-type: none"> ➢ Updated ED2 actuals and forecast via RRP vs Options 1 & 2 ➢ All 2025/26 and 2026/27 charging model inputs available for both years ➢ Fully developed PCFM populated with Final Determinations outcomes. ➢ Accommodates Autumn 2027 OBR inflation update • More stable tariffs for suppliers and consumers (less volatility) • Less political pressure and media attention • Limited competing obligations • Allows time for model testing (Dry run to ensure no negative residuals) • Industry alignment • Charges for both years run together 	<ul style="list-style-type: none"> • Derogation required for both 2028/9 and 2029/30 charges • Suppliers get less than 15-months' notice
2	Option 3	Sep-27	<ul style="list-style-type: none"> • 2028/29 charges set based on Ofgem's Draft Determinations • 2029/30 charges set based on Ofgem's Final Determinations 	<ul style="list-style-type: none"> • Most information available <ul style="list-style-type: none"> ➢ Updated ED2 actuals and forecast via RRP vs Options 1 & 2 ➢ 2025/26 charging model inputs available for 2028/29 charges ➢ 2026/27 charging model inputs available for 2029/30 charges ➢ Substantially developed PCFM populated with Draft Determinations outcomes. ➢ Accommodates Spring 2027 OBR inflation update • Tariff volatility partially improved 	<ul style="list-style-type: none"> • Derogation required for both 2028/9 and 2029/30 charges • Suppliers get less than 15-months' notice • PCFM values and calculative methodology can still change as we transition to Final Determinations • Cost allowances can still change as we transition to Final Determinations • Inflation could only be based on the March 2027 OBR forecast • Numerous competing regulatory obligations such as the SLC46 regulatory return, the Losses calculations and ED3 workload. • Less stable tariffs for suppliers and consumers (volatility reduced but still significant) • Continued political pressure and media attention • Allows no time for model testing (Dry run to ensure no negative residuals) • Charges setting run twice

Options: Assumptions / Pros / Cons (2 of 2)

#	Option	Publication	Assumptions	Pros	Cons
1	Option 2	Feb-27	<ul style="list-style-type: none"> 2028/29 charges set based on Final DNO Business Plan submissions 2029/30 charges set based on Ofgem's Final Determinations 	<ul style="list-style-type: none"> Limited competing obligations 	<ul style="list-style-type: none"> Limited information available <ul style="list-style-type: none"> ➤ 2025/26 charging model inputs available for 2028/29 charges and 2026/27 model inputs available for 2029/30 charges Derogation required for both 2028/9 and 2029/30 charges Suppliers get less than 15-months' notice PCFM not available – only partially developed via Ofgem working groups Cost more developed but may not be approved/accepted by Ofgem in their determinations Inflation could only be based on the November 2026 OBR forecast Unstable tariffs for suppliers and consumers (tariff volatility likely to be high) More political pressure and media attention Allows no time for model testing (Dry run to ensure no negative residuals) No industry alignment Charges setting run twice
2	Option 1	Dec-26	<ul style="list-style-type: none"> 2028/29 charges set based on DNO Draft Business Plan submissions 2029/30 charges set based on Ofgem's Final Determinations 	<ul style="list-style-type: none"> Limited competing obligations 	<ul style="list-style-type: none"> Limited information available <ul style="list-style-type: none"> ➤ 2025/26 charging model inputs available for 2028/29 charges and 2026/27 model inputs available for 2029/30 charges Derogation required for 2029/30 charges Suppliers get less than 15-months' notice for 2029/30 charges PCFM not available – only partially developed via Ofgem working groups Cost still in embryonic status and could move significantly as we progress through the ED3 process Inflation could only be based on the November 2026 OBR forecast Unstable tariffs for suppliers and consumers (tariff volatility likely to be high) More political pressure and media attention Allows no time for model testing (Dry run to ensure no negative residuals) No industry alignment Charges setting run twice

- A derogation against the DCUSA 15-months notice period in 19.1A required for both 2028/29 and 2029/30 charges.
- The default notice period would defer to 40-days (19.1B), but DNOs would use best endeavours to publish charges for both years by the end of January 2028.

Use of System Charges

19.1A The Company may vary the Use of System Charges at any time by giving the requisite period of written notice to the User. The requisite period of notice is (subject to Clause 19.1B):

19.1.1 where the Company is a DNO Party acting within that DNO Party's Distribution Services Area:

- A. in the case of the charges to apply from 1 April 2016 only, 3 months; or*
- B. in the case of the charges to apply on or after 1 April 2017, 15 months; or*

19.1.2 where the Company is an IDNO Party or a DNO Party acting outside of that DNO Party's Distribution Services

- A. in the case of the charges to apply from 1 April 2016 only, 2 months;*
- B. in the case of the charges to apply on or after 1 April 2017, 14 months.*

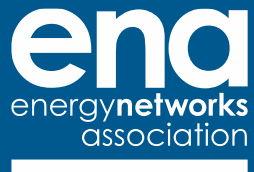
19.1B The periods of notice described in Clause 19.1A shall apply unless the Authority directs the Company that those periods of notice need not apply. Where the Authority directs the Company that those periods of notice need not apply, the notice period shall be 40 days (without prejudice to any longer notice requirements prescribed by the Distribution Licence).

Key Point Summary

- **DNO's have considered four potential options for setting 2028/29 charges, all based around the ED3 timeline (following the DNO business plan submissions (draft and final) and after Ofgem's determinations (draft and final)).**
- **DNO's have a "red line" between Options 1 & 2 based on business plan submissions and Options 3 & 4 following Ofgem determinations due to:**
 - The accuracy of the data available.
 - The level of maturity of the price control settlement and its key decision points.
 - The level of development of the associated models (e.g. the PCFM).
- **The later we set tariffs the more accurate the information they will be based on.**
- **The advantages of Option 4 over option 3 are:**
 - A retrospective analysis of ED2 revenues shows much greater stability under a 2-month notice period, which would be advantageous to suppliers and customers in the light of economic and ED3 framework uncertainty. This is also supported in the historic path of prices.
 - DUoS charges remain a relatively small and stable proportion of supplier and household energy bills.
 - There are historical examples of where 15-month notice has been reduced to accommodate policy implementation (SoLR) with possible further initiatives on the horizon (debt relief scheme).
 - Implementation of 15-month notice was deferred specifically due to allowed revenue uncertainty at the start of ED1.
 - We saw significant volatility at the start of ED2 when the 15-month notice was not deferred.
 - There can be significant movement between the draft and final determinations. In ED2 the final determinations were on average 6.9% higher than the draft determinations with the maximum DNO increase being 11.1% and compared to the maximum reduction being 14.1%.
 - For Option 4 all information is available: Updated ED2 actuals and forecast via RRP, all 2025/26 and 2026/27 charging model inputs available for both years; fully developed PCFM populated with Final Determinations outcomes and it could accommodate the Autumn 2027 OBR inflation update.
 - It will result in more stable tariffs for suppliers and consumers (less volatility).
 - Less political pressure and media attention.
 - Limited competing other regulatory and business obligations.
 - Allows time for model testing (Dry run to ensure no negative residuals).
 - Aligns with the notice periods in other industry sectors.
 - We are operating in a more uncertain geopolitical environment than any time in recent history.
 - Charges for both years run together and communicated to Suppliers.
- **The above means that an Ofgem derogation would be required against the DCUSA obligation to provide 15-months notice for both 2028/29 and 2029/30 charges.**
- **The default notice period would defer to 40-days, but DNOs would use best endeavours to publish charges for both years by the end of January 2028.**

Additional considerations

- Plan for BAU delivery:
 - Availability of financial models
 - Input assumptions to ensure DNO consistency
 - Interactions with ED2 licence obligations in respect of AIP process and PCFM publication



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