

RIO-ED2 Distribution System Operation Incentive Report 2025/26

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A Distribution System Operation (DSO) Output Delivery Incentive (ODI) was introduced as part of our RIO-ED2 Final Determinations. The purpose of the DSO incentive is to drive licensees to more efficiently develop and use their network, considering flexible alternatives to network reinforcement. From 1 April 2024, Ofgem is required to publish a Distribution System Operation (DSO) Incentive Report by 30 September each year.

This DSO Incentive Report for the reporting year 2025/26 sets out the distribution network companies' DSO Stakeholder Satisfaction Survey scores; the DSO Performance Panel scores; detailed Performance Panel feedback and the overall financial reward or penalty that each distribution network company will receive for the DSO incentive.

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

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RIIO-ED2 Distribution System Operation Incentive Report 2025/26

Contents

Executive summary	4
1. Background	6
Overview	6
The DSO Incentive Evaluation Criteria	7
2. DSO Stakeholder Satisfaction Survey Scores	8
The DSO Stakeholder Satisfaction Survey	8
The results of the 2026 survey	9
3. DSO Performance Panel	11
Introduction	11
Purpose of the Panel	11
Contextual factors to this year's assessment	12
Panel scoring summary	12
Areas for improvement	13
Best practice	15
Guidance for future DSO Performance Panel iterations	16
The results of the 2025/26 Panel Assessment	17
4. Overall Financial Reward or Penalty	18
Send us your feedback	19
Appendix 1. SP ENW feedback	20
Appendix 2. NPg feedback	25
Appendix 3. NGED feedback	31
Appendix 4. UKPN feedback	37
Appendix 5. SPEN feedback	44
Appendix 6. SSEN feedback	50

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

Executive summary

We introduced a new Distribution System Operation (DSO) Output Delivery Incentive (ODI) as part of our RIIO-ED2 Final Determinations. The purpose of the DSO incentive is to drive licensees to more efficiently develop and use their network, considering flexible alternatives to network reinforcement. This can help avoid or defer network reinforcement while uncertainty remains around future demand growth, reducing costs within the price control period.

We are required to publish a DSO Incentive Report by 30 September each year for the previous regulatory year ending 31 March and which sets out the following:

the distribution network companies' DSO Stakeholder Satisfaction Survey scores and rankings, including a breakdown by question, and the associated financial reward or penalty for each distribution network company.
distribution network companies' DSO Performance Panel scores and rankings, including a breakdown by DSO Performance Panel assessment criteria, and the associated financial penalty or reward for each distribution network company.
detailed DSO Performance Panel feedback for each distribution network company. This explains how the scores were decided, subject to redaction of confidential information.
the overall financial reward or penalty each distribution network company will receive for the DSO incentive.

This is the third DSO Incentive Report, and this document fulfils the requirement to publish a report on the outcome of the DSO incentive for the regulatory year commencing 1 April 2025.

The DSO incentive consists of two equally weighted Evaluation Criteria. These are:

the DSO Stakeholder Satisfaction Survey, which intends to drive distribution network companies to become more responsive to their stakeholders' needs and improve service levels.

the DSO Performance Panel assessment that helps to reduce the information asymmetry between distribution network companies and Ofgem, brings in additional expert views, and provides industry with a platform to hold distribution network companies to account.

Table 1 below shows the total reward or penalty broken down by the two components of the incentive.

Table 1: RIIO-ED2 DSO incentive total reward or penalty¹

DSO	Survey value (£m)	Panel value (£m)	Total (£m)
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¹ Figures in this report are sourced from Regulatory Reporting Packs submitted by licensees on 31 July 2026. Figures may not sum exactly due to rounding.

RIO-ED2 Distribution System Operation Incentive Report 2025/26

SP ENW ²	1.75	1.50	3.24
NPg	1.78	3.09	4.86
NGED	7.46	7.46	14.92
UKPN	5.53	5.53	11.05
SPEN	3.51	3.00	6.51
SSEN	3.58	3.58	7.16

² Electricity North West Ltd (ENWL) was acquired by SPEN's parent company, Iberdrola in 2025 and subsequently rebranded as SP Electricity North West (SP ENW). We continue to treat SP ENW separately from the other SPEN licensees for the purposes of the DSO incentive.

RIO-ED2 Distribution System Operation Incentive Report 2025/26

1. Background

Overview

- 1.1 The RIO-ED2 price control sets the outputs that the 14 Distribution Network Operators (DNOs) need to deliver for their consumers and the associated revenues they are allowed to collect for the five-year period from 1 April 2023 to 31 March 2028.³ Outputs and incentives are a key part of the RIO framework. They are designed to drive companies to focus on delivering the objectives that matter to existing and future consumers.
- 1.2 We introduced a new DSO incentive as part of RIO-ED2. The aim of the DSO incentive is to drive licensees to more efficiently develop and use their network, considering flexible alternatives to network reinforcement.
- 1.3 Specifically, the DSO incentive framework is intended to evaluate performance against the Baseline Expectations for DSO that were set out in our RIO-ED2 Business Plan Guidance, as well as the associated delivery of DSO benefits that emanate from these activities.⁴ It does so by embedding robust performance measures, capturing stakeholder views and incorporating a more holistic assessment from a performance panel of technical and industry experts. The DSO Baseline Expectations correspond to the three DSO roles and five DSO activities set out in Table 2 below. The DSO roles and Baseline Expectations underpin the design of the DSO incentive framework.

Table 2: DSO roles and activities

Role	Activity
Role 1: Planning and network development	1.1. Plan efficiently in the context of uncertainty, taking account of whole-system outcomes, and promote planning data availability.
Role 2: Network operation	2.1. Promote operational network visibility and data availability
Role 2: Network operation	2.2. Facilitate efficient dispatch of distribution flexibility services
Role 3: Market development	3.1. Provide accurate, user-friendly and comprehensive market information
Role 3: Market development	3.2. Embed simple, fair and transparent rules and processes for procuring distribution flexibility services

³ RIO stands for Revenue = Innovation + Incentives + Outputs.

⁴ [Business Plan Guidance- chapter 4](#)

R110-ED2 Distribution System Operation Incentive Report 2025/26

- 1.4 In this report we refer to the regulated companies as DSOs as it is DSO capabilities and activities that are being assessed. We do, however, recognise that DNO-DSO operating models vary across licensees.

The DSO Incentive Evaluation Criteria

- 1.5 The DSO incentive is made up of two Evaluation Criteria. These are:
- the DSO Stakeholder Satisfaction Survey which drives the DSOs to become more responsive to their stakeholders' needs and improve service levels.
 - the DSO Performance Panel assessment which helps reduce the information asymmetry between distribution network companies and Ofgem, brings in additional expert views, and provides stakeholders with a platform to hold distribution network companies to account.

2. DSO Stakeholder Satisfaction Survey Scores

This section describes the outcome of the DSO Stakeholder Satisfaction Survey for 2025/26.

- 2.1 The aim of the DSO Stakeholder Satisfaction Survey is to encourage DSOs to engage proactively with DSO Stakeholders to become more responsive to their needs and improve service levels. We expect that each DSO will use this feedback to inform their current business operations and in planning for future decision making.
- 2.2 For the purposes of the DSO incentive, DSO Stakeholders are defined as individuals or organisations that affect or can be affected by the DSO activities of the distribution network company. They may have a direct or indirect interest in DSO activities, and their interaction could vary in frequency.
- 2.3 This report includes each DSO's Stakeholder Satisfaction Survey scores with rankings, including a breakdown by question, and the associated financial reward/penalty for each distribution network company.

The DSO Stakeholder Satisfaction Survey

- 2.4 Each DSO is required to commission their own online survey from an independent and reputable market research company, which will undertake the DSO Stakeholder Satisfaction Survey on their behalf. Surveys were conducted in accordance with the guidance set out in the DSO Incentive Governance Document.
- 2.5 The DSO Stakeholder Satisfaction Survey had five detailed questions asking DSO Stakeholders to score their experience. Each of the DSO Stakeholder Satisfaction Survey questions asked DSO Stakeholders to score their experience on a scale of one to 10. A score of one indicates that the DSO Stakeholder is very dissatisfied and a score of ten indicates that the DSO Stakeholder is very satisfied. DSO Stakeholders also had the ability to indicate if the scored question is not applicable. The questions were as follows:
 - 2.6 question 1: What is the stakeholder's experience of the DSO's coordination with other network and system operators?
 - 2.7 question 2: What is the stakeholder's experience of the provision of data and information provision?
 - 2.8 question 3: What is the stakeholder's experience of the DSO's support for flexibility market development?
 - 2.9 question 4: What is the stakeholder's experience of DSO decision making performance; and

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

- 2.10 question 5: What is the stakeholder's experience of the DSOs approach to network planning.
- 2.11 The average (mean) score is based on the average (mean) score for each of the five DSO Stakeholder Satisfaction Survey questions. An example of this is provided in Table 9 in Appendix 3 of the DSO Incentive Governance Document.
- 2.12 The target score for the DSO Stakeholder Satisfaction Survey is set at 7.70/10, but with a lower deadband at 7.50/10 and an upper deadband at 7.90/10. The maximum reward applies to a score greater than or equal to 9.00/10, and maximum penalty applies to a score less than or equal to 6.40/10.

The results of the 2026 survey

- 2.13 The DSO Stakeholder Satisfaction Survey scores for each company are ranked in Table 3. Table 4 shows a breakdown by question and Table 5 outlines the associated financial reward or penalty for each DSO.

Table 3: DSO ranked Stakeholder Satisfaction Survey scores

Rank	DSO	Survey score
1	UKPN	9.52
2	SPEN	9.38
3	NGED	9.29
4	SP ENW	9.23
5	SSEN	9.20
6	NPg	8.53

Table 4: DSO Stakeholder Satisfaction Survey scores by question

Question	SP ENW	NPg	NGED	UKPN	SPEN	SSEN
Q1	9.32	8.54	9.29	9.53	9.61	9.16
Q2	9.23	8.79	9.33	9.50	9.22	9.16
Q3	9.07	8.39	9.34	9.39	9.33	9.11
Q4	9.28	8.41	9.27	9.42	9.33	9.15
Q5	9.26	8.53	9.29	9.74	9.39	9.41

Table 5: The associated financial reward or penalty ranking for each DSO

RIO-ED2 Distribution System Operation Incentive Report 2025/26

Rank	DSO	Value (£m)
1	NGED	7.46
2	UKPN	5.52
3	SSEN	3.58
4	SPEN	3.51
5	NPg	1.77
6	SP ENW	1.75

2.14 All DSOs achieved the minimum response rate threshold of 5% of its DSO Stakeholder population.

2.15 In March 2025 we updated the DSO Incentive Governance Arrangements. Where DSOs receive responses to the survey which they do not believe reflects a fair assessment of DSO activities in the relevant regulatory year, they could request that a response be removed by making a submission to Ofgem. We received requests from four DSOs to remove a total of 17 survey responses. We reviewed each of these requests and allowed these to be removed from the final scores.

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

3. DSO Performance Panel

The Panel assessed DSO performance during 2025/26 against the established assessment criteria. All six DSOs received a higher overall score than in 2024/25. The Panel identified sector-leading performance in specific assessment areas, but maturity remained uneven, particularly in the scale and operational use of flexibility markets. Across submissions, the Panel continued to seek clearer evidence of delivered outcomes, stronger attribution and reconciliation of benefits, and a clearer line of sight between previous commitments and current delivery.

Introduction

3.1 This chapter sets out the DSO Performance Panel’s (“the Panel’s”) assessment of DSO performance for the year 2025/26. Individual feedback from the Panel for each DSO can be found in the Appendices to this report.

Purpose of the Panel

- 3.2 The Panel is formed from a mix of independent experts and DSO Stakeholder representatives. The Panel’s role is to challenge and evaluate DSO performance in each year of RIIO-ED2 against the predetermined DSO Performance Panel assessment criteria.
- 3.3 When a DSO clearly demonstrates that its performance against the DSO Performance Panel assessment criteria has gone beyond Baseline Expectations, then this should be reflected in an incentive reward. Equally, where a DSO has clearly failed to demonstrate that it has taken the necessary actions against the DSO Performance Panel assessment criteria to meet Baseline Expectations, then this should result in an incentive penalty.
- 3.4 The Panel provides a performance recommendation (in the form of a Panel Score) for each DSO to Ofgem, which reviews the available evidence to determine whether to impose a financial penalty or reward. For further details on the Panel’s assessment process, please see the DSO Incentive Governance Document.

Panel members

3.5 The Panel is made up of the following individuals. Further information on each Panel member is available on our website.

Independent experts:

- Gary Swandells, Director, Smart Grid Consultancy
- Jacopo Torriti, Professor of Energy Economics, University of Reading
- Jason Brogden, Director, Jason Brogden Consulting

Stakeholder representatives:

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

- Citizens Advice - represented by Andy Manning
- Association for Decentralised Energy (ADE) - represented by Gemma Stanley

Chair (non-scoring):

- Jack Presley-Abbot, Interim Director, Energy Systems Management and Security, Ofgem

Contextual factors to this year's assessment

- 3.6 The 2025/26 regulatory year is the third time the DSO Performance Panel assessment and review process has taken place. There was some variation across DSOs' approaches to their submission this year, including in the type of evidence used to demonstrate performance (eg what Key Performance Indicators (KPIs) were used, what key information was included and how information was presented). The Panel acknowledges that the evidence provided by DSOs has continued to increase in quality and that submissions were more standardised than in previous years.
- 3.7 Regarding the call for evidence, stakeholder views are seen as a valuable part of the process going forward in RIIO-ED2. The DSO Panel Submissions and DSO Sessions made up the bulk of the Panel's evaluation this year, with the call for evidence supporting the Panel's decision-making. In total 18 responses were received to the call for evidence, which was one less than last year.
- 3.8 The subsequent sections of this report highlight general trends across DSOs from the Panel's evaluation, before detailing individual company feedback in the Appendices to this report. The general feedback also details the Panel's preferences for future submissions regarding the type and format of evidence that should be included. The general feedback in this chapter should be considered by all DSOs, even if not specifically referenced in individual feedback.

Panel scoring summary

- 3.9 All DSOs received an overall score of "Good" or "Excellent" this year, showing continued improvement from previous years, with all DSOs receiving a higher overall score for the Performance Panel than last year. Average scores were high across all scoring criteria, and DSOs had different areas of relative strengths and weaknesses across them.
- 3.10 The Panel identified sector-leading performance from some companies in specific assessment areas, with evidence of strong performance to be found across several DSOs. All companies demonstrated progress during the year, although the maturity of markets and processes remains uneven and some activities remain at trial or development stage.

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

Areas for improvement

1. Providing clearer practical evidence

- 3.11 While a lot of good progress has been made on improving processes around flexibility market development, options assessment, conflict of interest mitigation and whole-system coordination, it is important to ensure that these activities are delivering positive results. To that end submissions could have been improved by providing more practical evidence of outcomes, rather than primarily describing processes.
- 3.12 This could take the form of worked examples of where planning and operational decisions have materially changed because of whole-system coordination, governance processes or other DSO activities. Some submissions did provide concrete examples of where DSO/NESO dispatch conflicts were resolved, decisions have changed because of cross-vector coordination, and conflicts of interests have been identified and resolved. However, more explicit practical examples in these areas would generally improve the quality of submissions across the board.
- 3.13 It is evident that progress has been made on data provision, but many submissions could have provided more evidence linking this work to customer outcomes and described how customers rely on these datasets in practice. An increase in the number of datasets published is positive and demonstrates progress in transparency and data provision, but dataset growth alone is not evidence of stakeholder value. Greater weight should be placed on evidence that the data improves decision-making, planning, forecasting accuracy, flexibility participation or customer outcomes.
- 3.14 Similarly, it is important that initiatives to improve market access and participation lead to reductions in participation barriers and provider costs in practice, and so more evidence to demonstrate this in submissions would be beneficial.
- 3.15 It is important to note that this descriptive evidence should be seen as a complement to, rather than a replacement for, quantitative evidence where it can be provided.

2. Benefits attribution and reconciliation

- 3.16 The Panel acknowledges that progress has been made on the quantification and consistent valuation of benefits and recognises the difficulty in completely standardising benefits methodologies across all DSOs. However, it was felt that submissions could have benefited from more clarity on the relationship between previous years' ambition and this year's reported delivery.

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

- 3.17 Where DSOs have changed the methodology or reporting basis for benefits calculation from previous years, a reconciliation is required to ensure consistency. It should be clear to see how ambition and foundational work from previous years has translated into realised benefits in the current year.
- 3.18 If activities, benefits or KPIs have underperformed relative to targets, then submissions should acknowledge this and provide explanation and detail of any course-correcting action that is needed. For instance, some DSOs experienced lower benefits than forecast due to connections reform delays and the Panel appreciated where this was clearly acknowledged, explained and in some instances where the opportunity was taken to redeploy resources or investigate other areas of DSO benefit.
- 3.19 Some submissions reported benefits, particularly around accelerating connections, where it was unclear how far they were uniquely attributable to DSO activities rather than wider connections policy or DSO processes. Clearer articulation of causal pathways between DSO-led activities and delivered benefits would help to ensure consistent assessment of benefits.
- 3.20 It was also not always clear from submissions when benefits represented additional value delivered this year, versus which were a continuation of the same portfolio for previous years. For instance, many DSO's reported benefits related to accelerated connections, and in some submissions, it was unclear whether the number of accelerated connections related to new accelerated offers given this year, or the total number of accelerated assets being supported on their network.
- 3.21 Finally, some submissions reported benefits which were heavily future-facing and it was not always clear what benefits have been realised to date, versus which are unlocked future benefits. The Panel felt that it would be helpful for submissions to be clear on this point, and about where assumptions were being used to estimate future benefits.

3. Ensuring evidence is clearly mapped to the scoring criteria

- 3.22 Submissions were generally well structured and feedback from last year about focusing on information relevant to the assessment criteria was clearly taken on board. Some submissions, however, could still have done more to clearly map evidence specifically to the scoring criteria.
- 3.23 Many submissions were light on detail about how far flexibility services and products are standardised, whether industry standard practice is being followed and how Open Network Project deliverables are being used in practice. Even if DSOs have provided evidence in previous years' submissions that full standardisation and integration of industry standards have been achieved, information is still required in each year's submission about how the DSO is currently performing against those criteria.

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

- 3.24 It is also worth noting that in the context of the establishment of the Market Facilitator role, evidence of how far DSOs have engaged with and implemented Market Facilitator deliverables should be provided to demonstrate that industry standard practice is being followed.
- 3.25 The existing DSO Performance Panel assessment criteria already require DSOs to demonstrate performance in areas that may involve engagement with wider regulatory and industry initiatives. In particular, the scoring guidance in Appendix 6 of the DSO Incentive Governance Document includes expectations relating to the promotion of wider-system benefits under Delivery of DSO Benefits; the use of common formats, industry standards and standardised APIs under Data and Information Provision; and the adoption of standardised arrangements, support for third-party market services and the reduction of barriers to participation in flexibility markets. Where wider initiatives are relevant to these existing expectations (for example, but not limited to, Flexibility Market Asset Registration), DSOs should provide clear evidence of their engagement and delivery against them. Ahead of next year's assessment, Ofgem will consider how evidence relating to wider regulatory and industry initiatives can be gathered and considered within the existing assessment framework.

4. Flexibility market development

- 3.26 In general, there have been material improvements in flexibility market development across DSOs, but for some there is still limited evidence of market scaling or system-wide optimisation, indicating that flexibility is not yet delivering its full potential.
- 3.27 For some DSOs, much of the activity in this space is innovation-linked, or flexibility-adjacent rather than conventional market development. Submissions should be clear about which activities are live BAU products, and which are trials, development activity and innovation-funded work.

5. Cross-vector and cross-sector working

- 3.28 Cross-vector and cross-sector working is a key element to several of the scoring criteria, but this was not strongly evidenced in several reports. The Panel had to ask questions to several DSOs for the panel interview sessions to gather more evidence to support scoring against those criteria.

Best practice

- 3.29 Although there are still areas for improvement, the Panel judged there to be clear improvements in the quality of submissions and strong examples of DSOs exceeding expectations in individual assessment areas. In this section, the Panel would like to highlight some of the stand-out activities and strengths demonstrated:

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

- **benefits:** Several DSOs demonstrated a significant year-on-year increase in realised benefits, with particularly strong evidence in some cases of delivery against or above previous feedback. Feedback from previous years has also been taken on board as stronger and more quantified evidence of benefit delivery was provided within a more standardised framework.
- **flex market development:** Participation in flexibility markets has improved substantially for some DSOs, with a clear growth in providers and volumes available. There has also been further development of day-ahead markets and demand turn-up markets across several DSOs as well as trials into new areas like voltage and outage management. Progress has also been made in implementing market standardisation and improving coordination with NESO.
- **data and information provision:** This was a particularly strong area across several DSOs, with the publication of even more actionable datasets supported by stronger stakeholder feedback loops and improved portal functionality. Several companies also demonstrated increased integration of third-party data (in particular Local Authority data) into their systems.
- **DER visibility, dispatch and whole-system coordination:** The Panel saw strong examples of mature DER visibility and automated dispatch, supported by improved operational coordination and data exchange with NESO. In the strongest cases this translated into clear evidence of whole-system outcomes and operational delivery at scale.

Guidance for future DSO Performance Panel iterations

3.30 This section provides an overview of panellist guidance for future iterations of the DSO Performance Panel. Although this guidance is not mandated, the Panel strongly encourage its adoption to improve submission quality, resultant evaluation, and the broad value of the Panel process. Ofgem will take this guidance into consideration in any future consultations regarding the DSO Incentive Governance Document.

Submission evidence expectations

3.31 Future submissions should provide a clear line of sight between commitments made in previous years and current delivery, including where commitments have been delayed, changed or remain at trial stage. This should apply across the relevant assessment criteria and not only to benefits or KPI reporting.

Standardisation of KPIs

3.32 Significant progress has been made on standardising the reporting of benefits, but for future submissions it would also be helpful to see more standardisation of KPIs and other reporting metrics across DSOs. Companies should build on the progress made on benefits standardisation by collaborating on the development of more standardised KPIs to improve the quality of reporting and assessment in future years.

RIO-ED2 Distribution System Operation Incentive Report 2025/26**The results of the 2025/26 Panel Assessment**

3.33 The Panel's recommended score rankings are as follows.

Table 6: DSO Panel assessment scores

Rank	DSO	Score
1	UKPN	9.56
2	NGED	9.02
3	SSEN	8.79
4	NPg	8.00
5	SP ENW	7.72
6	SPEN	7.71

3.34 We have assessed the recommendations of the Panel and agree with their conclusions. The table below outlines the associated financial reward or penalty following Ofgem's acceptance of the Panel's conclusions.

Table 7: associated financial reward or penalty ranking for each DSO⁵

Rank	DSO	Value (£m)
1	NGED	7.46
2	UKPN	5.52
3	SSEN	3.58
4	NPg	3.08
5	SPEN	3.00
6	SP ENW	1.50

⁵ Rewards are calculated based on a % of the return on regulatory equity (RoRE). RoRE varies between companies meaning that the ranking in terms of scores and associated reward may differ.

RIO-ED2 Distribution System Operation Incentive Report 2025/26

4. Overall Financial Reward or Penalty

4.1 The overall financial reward or penalty each distribution network company will receive for the DSO incentive for 2025/26 is outlined in Table 8 below.

Table 8: The overall financial reward or penalty for each DSO.⁶

DSO	Survey Value (£m)	Panel value (£m)	Total (£m)
SP ENW	1.75	1.50	3.24
NPg	1.78	3.09	4.86
NGED	7.46	7.46	14.92
UKPN	5.53	5.53	11.05
SPEN	3.51	3.00	6.51
SSEN	3.58	3.58	7.16

⁶ Figures may not sum exactly due to rounding.

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

Send us your feedback

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this decision. We would also like to get your answers to these questions:

1. do you have any comments about the quality of this document?
2. do you have any comments about its tone and content?
3. was it easy to read and understand? Or could it have been better written?
4. are its conclusions balanced?
5. did it make reasoned recommendations?
6. do you have any further comments?

Please send your feedback to stakeholders@ofgem.gov.uk.

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

Appendix 1. SP ENW feedback

Criteria	Comments	Score
Delivery of DSO Benefits	For level of ambition: the Panel thought SP ENW's submission had set out a clear and increasingly outcome-led ambition, reporting substantial realised and forecast benefits and linking its activities to green growth, regional decarbonisation, efficient long-term capacity and a social DSO role. As per last year, it is important to note that delivery and ambition was measured against the ED2 business plan which reflects the characteristics of their network and customer base. The Panel considered the benefits framework to have been structured and based on recognised appraisal principles, with evidence covering consumers, distributed energy resources, local authorities, communities and wider system value. The Panel viewed cross-vector and regional engagement as a particular strength, including work with local authorities, transport and health bodies, gas networks and wider strategic planning. The Panel raised recurring questions about attribution and additionality. Accelerated connections had accounted for a large share of benefits, but the evidence had not always distinguished DSO-led value from connections policy, wider DSO delivery or BAU processes. Similar questions have arisen around Smart Street, innovation outputs and social value. The Panel thought clearer counterfactuals, separation of realised and forecast benefits and controls against double counting would have strengthened the case. The lead role of the DSO in decision-making was well set out, but this only came through in the Panel presentation, rather than the report itself. For benefits realisation: the Panel thought SP ENW had clearly reported and tracked benefits against its RIIO-ED2 transition plan and KPI framework, with strong year on year improvement and evidence of realised value from deferred reinforcement, accelerated connections, Smart Street, coordinated network development and flexibility dispatch. The Panel also noted examples where methodologies had been refined and plans had been adjusted following stakeholder feedback. have been mixed: flexible connections energised and flexibility services procured remained below target, despite other indicators meeting or exceeding expectations. The Panel sought clearer explanations of the causes, whether the	7.8

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	shortfalls had been temporary or structural, the mitigation undertaken and any effect on the end-of-period forecast. It also thought the documented link between benefit and KPI monitoring and management action had not always been clear. Clearer separation of DSO outcomes from DSO delivery, innovation activity, passive voltage optimisation and wider social value would have increased confidence in attribution.	
Data and information provision	For scope, granularity and accuracy of data: the Panel thought SP ENW had expanded the scope and granularity of data across planning, operational and market roles. It highlighted increased publication, LV monitoring, smart-meter and third-party data integration, the property level LCT Readiness Checker, E-Connect, forecasting tools, live fault data and published methodologies. The Panel noted that the data had supported capacity assessment, local area planning, connections and flexibility identification, and that validation, metadata, triage and governance processes had been established. The Panel thought some evidence had focused more on dataset numbers and platform improvements than on demonstrated outcomes. It sought clearer dataset level evidence on accuracy, completeness, reliability, refresh frequency, validation, suppression and limitations, together with measurable examples showing how data had improved forecasts, investment choices, operational decisions or customer outcomes. The Panel presentation delivered a very clear articulation of the value of a single source of data from source systems used across the business and in DSO data reporting. The Panel did not consider sector leadership to have been demonstrated consistently across all assessments. For accessibility of data: the Panel thought SP ENW had made its data accessible through a central open-data portal, machine-readable formats and APIs, supported by network models, heatmaps, spatial mapping, persona-led navigation, an education hub and search tools. It highlighted the LCT Readiness Checker and noted that user engagement and collaboration with other network companies had informed presentation, visualisation and publication frequency. The Panel also recognised the use of common standards, including a CIM-aligned network model and standardised metadata, and considered growing user and API activity to have supported the accessibility case.	8.2

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	However, the Panel sought stronger evidence of actual stakeholder use and benefit, including user numbers, repeat use, downloads or API calls, feedback and accessibility issues. It also asked for examples where local authorities, installers, developers or flexibility providers had saved time, reduced costs or made better decisions. The update frequency of some datasets had not always been clear.	
Flexibility market development	For design of distribution flexibility products, contracts and processes: the Panel considered SP ENW to have made good progress in the development of its flexibility markets using ENA standard agreements and products, lower participation thresholds, an independent market platform, monthly procurement cycles, LV flexibility procurement and plans for day-ahead markets. Members also noted growth in tender locations, registered assets, provider participation and dispatch activity, alongside initiatives such as ElectronConnect, BiTraDER and demand turn-up trials. The Panel sought further clarity on areas including procurement performance, the role of innovation activities in supporting market development, product standardisation and the practical impact of stakeholder engagement on market design. Through the panel discussion, SP ENW provided additional context on how market outcomes have been aligned with stakeholder and regional needs, the actions taken in response to market performance and the steps being taken to support the continued growth and maturity of flexibility markets, including at LV level. For facilitation of market access: the Panel considered SP ENW to have introduced a range of measures to simplify and widen participation, including a 5 kW threshold, an automated MPAN eligibility checker, open participation routes, support for revenue stacking, an absence of exclusivity clauses, clearer information and targeted engagement with smaller, community and local authority participants. Members noted growth in active providers and registered assets, increased dispatch activity, more frequent procurement cycles and developing coordination with NESO through conflict-risk information, APIs, Technical Limits processes and ICCP links. The Panel discussed the distinction between registered assets, tendered opportunities, contracted capacity and delivered flexibility, and welcomed further information on how participation and market activity had evolved over time. Members also sought additional evidence on the impact of	7.3

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	market access initiatives, including their effect on participation costs, onboarding and new market entrants, as well as further examples of operational coordination and data sharing with NESO. The panel discussion provided helpful additional context on these areas and the progress being made to support wider participation and market development.	
Options assessment and conflicts of interest mitigation	For assessment of network options: the Panel thought SP ENW's options assessment approach had been structured and transparent, using published DSOA and network development material, the Operational Decision-Making Framework, cost tools, modelling and scenario analysis to compare reinforcement, flexibility and other interventions. It noted systematic assessment of network needs, substantial signposting to flexibility, coordinated development schemes and engagement with local authorities, network users and regional bodies. The Panel also recognised consideration of long-term uncertainty, option value and whole-system planning. However, views had been mixed on the depth of cross-sector and cross-vector evidence (although the presentation expanded on examples for transport including charge point data sharing and support to Local Authority LEVI funding) and on whether flexibility had consistently been treated as a genuine alternative rather than a complementary measure. The Panel sought worked examples showing the need, full range of options, counterfactual, valuation method, selected and rejected solutions, stakeholder input, delivery status and quantified cost, carbon and capacity outcomes. The conversion of flexibility signposting into tenders, contracts, dispatch or deferred reinforcement had not always been evident. For management of conflicts of interest: the Panel thought SP ENW had strengthened its formal governance framework through functional separation, defined decision rights and escalation routes, executive and board visibility, independent scrutiny, published policies, conflict logging and external review. It considered the CLASS and primacy work to have provided a useful example of considering actual and perceived market conflicts, while published DSOA outcomes and governance reporting had supported transparency. However, the Panel thought the submission had not consistently provided detailed operational documentation showing DNO-DSO hand-offs, and some assessments had regarded the functional-separation model as lighter-touch	7.4

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	than those used elsewhere. Evidence of broad stakeholder validation, independent assurance outcomes and practical cases where a conflict had changed a decision had also been limited. The Panel sought anonymised examples showing how conflicts had been identified, risk-scored, escalated, mitigated and resolved, including conflicts between reinforcement and flexibility, and clearer evidence of stakeholder confidence following organisational changes. The DSO lead in decision-making was made clearer within the Panel presentation, with the connected benefits of DSO driven action set out, particularly for accelerated connections. It was positive that there had been an independent review of SP ENW's DSO model, but the results of this were not published or shared.	
Distributed energy resources (DER) dispatch decision making framework	The Panel thought SP ENW had made significant progress in DER visibility and dispatch through improved monitoring, a structured and published dispatch framework, integration of ANM, merit-order management and ElectronConnect, common dispatch interfaces, technical-limits capability and developing or live ICCP links with NESO. It highlighted the first real-time ANM connection as a strong practical example that had accelerated a battery connection, avoided a higher-voltage solution, limited curtailment and demonstrated coordinated automated control. The Panel noted that ANM deployment had remained at an early stage, ICCP coverage and operational use had not always been clear and no material DSO–NESO dispatch conflicts had yet occurred. It sought evidence of scale, including dispatch and curtailment events, participating DER, use in NESO services, live application of primacy rules, data exchanged through ICCP and examples showing whole-system conflict resolution and consistent dispatch logic in practice.	8

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

Appendix 2. NPg feedback

Criteria	Comments	Score
Delivery of DSO Benefits	For level of ambition: the Panel thought NPG's submission had set out a coherent, regionally grounded ambition focused on economic growth, industrial decarbonisation, efficient use of existing network headroom and support for areas with comparatively low uptake of low carbon technologies. It noted that the strategy had linked benefits to flexible connections, active network management, flexibility services, open data, forecasting and regional planning, supported by an established appraisal methodology. The Panel highlighted local authority use of LAEP+, engagement on heat, transport and industrial development, and coordination with NESO and transmission owners through delegated technical limits. The Panel thought much of the benefits case had remained future facing or dependent on external enablers, with realised benefits materially below unlocked and long-term ambitions. It sought clearer explanation, sensitivity analysis and attribution for large regional economic assumptions. The evidence had not always traced benefits to individual customer and network-user groups or distinguished business as usual activity from innovation funded projects. The Panel also sought evidence that long term ambition had been stress-tested against Connections Reform and transmission delivery uncertainty. For benefits realisation: the Panel thought NPG's benefits realisation framework had been transparent and supported by defined KPIs, year on year reporting and formal governance. Presentation evidence had strengthened the link between KPI monitoring, assumptions, sensitivities, challenge and review and ran through the allocation of benefits for Technical Limits. The Panel noted adaptation through self-funded deployment of LAEP+, Open Data Portal (ODP) improvements, changes to flexibility procurement and replanning following the Connections Reform pause. It also recognised the focus on vulnerable customers, industrial users and local authorities. However, the Panel found realised benefits modest compared with unlocked and forecast values and thought the written evidence had focused more on methods and enabling activity than outcomes. The relationship between KPI performance and specific reprioritisation or course correction decisions had not always been clear. Reduced contracted peak flexibility and dispatched volumes, despite growth in registered assets and providers, required explanation. The	7.8

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	Panel sought clearer reconciliation between prior commitments, current delivery and outputs that had remained pilots, trials or innovation funded activities.	
Data and information provision	For scope, granularity and accuracy of data: the Panel thought data provision had been a strong area for NPG. It highlighted broader planning, operational and market datasets; increased LV monitoring; greater use of smart-meter and third-party data; near real-time information; network models; forecasting and planning tools; LAEP+; and additional published methodologies. The Panel considered governance to have been strengthened through domain-level assessments, metadata, quality assurance, triage, formal sign-off, common standards and risk-based prioritisation. External user evidence had supported the richness, consistency and practical value of the data, and the presentation had provided examples of automated cleansing and stakeholder requests leading to new datasets. However, some LV data had remained modelled or indicative, and the written submission had not always defined the standards, controls and assurance processes used to establish accuracy and impartiality. The Panel sought dataset-level evidence on limitations, audit trails, quality measures and independent assurance, plus examples showing how data had changed stakeholder or investment decisions and there was a good explanation of data quality processes within the Panel presentation with examples. Whilst strong on data, NPG were not deemed to be industry leading (eg Sector leading claims required comparison and separation of NPG specific improvements from common platform functionality). For accessibility of data: the Panel thought accessibility had been a clear strength. It noted that the ODP had provided a structured route to datasets, network models, dashboards, feature pages, guidance and interactive outputs. Data had been available in machine-readable formats, with consistent APIs, CIM aligned network information and tailored tools for local authorities and other users. The Panel highlighted engagement through the Open Data User Club, webinars, technical deep dives, data surgeries and collaborative sessions, with feedback informing roadmap priorities and presentation. High and growing portal use, downloads and API calls had supported the case that provision had been accessible in practice.	8.8

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	The Panel sought evidence that outcomes had gone beyond usage statistics, including time saved, decisions supported, barriers encountered by less resourced users and reliance on tools for automated or high value decisions.	
Flexibility market development	For design of distribution flexibility products, contracts and processes: the Panel thought NPG had demonstrated close alignment with industry standard products, contracts and Open Networks arrangements, with justified deviations for specific propositions. It noted an independent end-to-end platform, standard scheduled products, Market Facilitator arrangements, week-ahead dispatch, more frequent tenders and stakeholder feedback leading to documentation and product changes. The Panel also recognised broader use cases including outage management, LV constraints, Empower Flex, Flex Advance, demand turn-up and dynamic network pricing, particularly efforts to broaden participation and address vulnerable customers. Several initiatives had remained pilots, derogated products or innovation funded activity rather than established business as usual delivery. The market growth narrative had not been fully matched by contracted and dispatched volumes, which had declined on some measures despite growth in registered assets and available capacity. However, it was explained in the Panel presentation that the overall figures are significantly reduced by demand turn-up deployed and that if this is stripped out, the figures are on target. The Panel recognised the progress NPG had made in developing and expanding its flexibility markets. It noted that additional information on the progression from tendered opportunities through to contracted, dispatched and realised flexibility outcomes would have provided greater visibility of market performance and maturity. Members also welcomed further discussion on how successful trials and innovation activities were expected to scale into business-as-usual delivery. For facilitation of market access: the Panel thought NPG had facilitated access through open registration, standard contracts, an independent market platform, more frequent procurement, week-ahead dispatch, revised qualification arrangements, provider engagement and tools simplifying eligibility and bidding. It noted that contracts had generally avoided exclusivity and supported service stacking, while registered assets, providers and available capacity had increased. The Panel also noted the reported current lack of	7.8

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	market appetite and value for a day ahead market in the NPG areas. Empower Flex had also sought to enable vulnerable household participation. Coordination arrangements had included contracted schedule notifications, monthly conflict-risk reporting, delegated technical limits and interim data sharing with NESO. The Panel stressed that registrations and theoretical capacity had needed to be distinguished from active providers, contracted assets, dispatch and settlement. Evidence that participation had become simpler or cheaper in practice had remained limited, while contracted and dispatched flexibility had reduced on some measures. Full real-time whole-system coordination had also depended on completion of the ICCP link. The Panel sought before and after evidence on costs, barriers, smaller provider involvement, stacking and the data shared with NESO and how it had changed outcomes.	
Options assessment and conflicts of interest mitigation	For assessment of network options: the Panel thought NPG's options-assessment framework had been clearly defined and accessible through published forecasting, network development, DSOA, governance and evaluation material. It noted consistent use of the Common Evaluation Methodology, supported by forecasting and outage risk tools, and a substantial expansion in assessment scope. The Panel highlighted proactive engagement with local authorities, government, transport, heat networks, industrial users, NESO, transmission owners and other network companies. Delegated technical limits, Yorkshire GREEN and the Starbeck example had illustrated coordinated planning and use of flexibility alongside longer-term reinforcement. The Panel thought evidence had remained stronger on process, tools and engagement than quantified decision outcomes. Significant flexibility opportunities had been identified, but comparatively few sites had been deferred, raising questions about conversion rates, ceiling prices and whether flexibility had been systematically selected. The Panel sought worked examples covering need, options, counterfactual, valuation, stakeholder input, selected and rejected solutions, delivery status and quantified benefits, plus reconciliation of current accelerated-connection figures with the previous year's portfolio. For management of conflicts of interest: the Panel thought NPG had strengthened governance and conflict management through a published DNO-DSO framework, five stage decision	8

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	model, role matrices, operational agreements, escalation routes, executive and board visibility, independent panel oversight and an enhanced conflict risk register. It noted that independent reviews and stakeholder consultation had informed the framework, while published DSOA outputs, methodologies and the Operational Decision-Making Framework had supported transparency. The Panel sought stronger evidence that the DSO model had been justified with evidence and broad stakeholder support and confidence. The Panel presentation provided some evidence of how stakeholder engagement has driven and validated the DSO approach and the role of the DRP. The confidence measures remained moderate and had not materially improved, while evidence had been limited on actual or perceived conflicts being identified, escalated, mitigated or changing a decision. The scope and findings of independent reviews, including whether additional risks had been identified and incorporated, had been unclear. The Panel requested further evidence on integration benefits, practical conflict cases, publication of outcomes beyond DSOA and how feedback had changed governance or operational behaviours.	
Distributed energy resources (DER) dispatch decision making framework	The Panel thought NPG had improved DER visibility through extensive LV monitoring, smart-meter data, a consolidated generation database, the Embedded Capacity Register, active network management records and operational data feeds. It noted that the published Operational Decision-Making Framework had provided transparent primacy and dispatch logic, while an independent dispatch platform had supported scalable, non-proprietary operation. Week-ahead forecasting, successful dispatch events, delegated technical limits and regular coordination with NESO demonstrated practical progress. The Panel also recognised substantial flexible capacity managed through active network management and earlier connections enabled at the transmission-distribution boundary. However, the ICCP link had remained in development (noting that NPG has completed their preparatory activities), so evidence had related to readiness and interim coordination rather than fully live automated exchange. Evidence of DER participation in NESO markets and whole-system conflict resolution had remained limited, and reported utilisation efficiency figures and dispatch-event totals had not always been clear. The Panel sought operational examples showing	7.4

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	how data, forecasting, dispatch rules or coordination had changed outcomes and contingencies for ICCP delay.	
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RIIO-ED2 Distribution System Operation Incentive Report 2025/26

Appendix 3. NGED feedback

Criteria	Comments	Score
Delivery of DSO Benefits	For level of ambition: the Panel thought NGED's submission had set out a clear, ambitious and increasingly outcome-led strategy, supported by a structured benefits framework and strong quantitative evidence. The Panel noted that NGED had reported substantial realised benefits, had considered impacts across household customers, GB consumers, distributed energy resources, flexibility service providers, local authorities and carbon emissions, and had aligned its appraisal with Green Book principles and external assurance. The Panel also recognised evidence of wider system coordination, local area energy planning, industrial engagement and work with NESO and other network companies. However, the Panel sought some additional clarification on the attribution and presentation of certain benefits. In particular, Flexible Connections had become a significant source of reported benefit in 2025/26, and panel members welcomed further explanation of the DSO-specific contribution, the counterfactual applied and how potential overlap with wider connections and network planning activities had been considered. The Panel also noted that some benefits associated with Technical Limits had been affected by wider Connections Reform developments and welcomed additional context on the relationship between previous forecasts, realised benefits and the remaining pipeline of benefits. Following the panel discussion, NGED provided further evidence of its engagement with gas, transport and other stakeholders, reinforcing the company's proactive approach to whole-system and cross-vector planning. Based on the evidence presented, the Panel considered NGED to demonstrate a highly mature and ambitious DSO approach. For benefits realisation: the Panel thought NGED had clearly articulated substantial benefits realised during RIIO-ED2 and had supported these with a defined KPI framework, senior leadership oversight and detailed reporting. The Panel highlighted benefits from reinforcement deferral, primary network options, flexible connections, enhanced outage planning, reduced curtailment and additional network capacity. The Panel also considered that NGED had adapted its plans when Technical Limits delivery had been delayed, had developed a dedicated curtailment capability and had	9

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	used stakeholder feedback to refresh its strategy and increase benefits. The Panel had concerns from the report that the uplift in benefits had depended heavily on connection related activity whose DSO attribution required further clarification. The Panel sought clearer evidence separating DSO led benefits from DSO and connections activity, explaining how double counting had been avoided and reconciling current categories with prior year reporting. The Panel also noted underperformance against heat pump uptake and short-term load forecasting KPIs and asked how NGED had course corrected, whether weather effects had been accounted for and how delayed Technical Limits benefits were expected to materialise. The Panel presentation provided good supporting evidence for how NGED has changed direction with Technical Limits and Connections Reform and prepared for customers being ready. There was a clearer articulation of how the benefits reporting has changed with traceability through to the ED2 business plan and DSO ambitions, including an explanation of flexible connections benefits.	
Data and information provision	For scope, granularity and accuracy of data: the Panel thought NGED had provided comprehensive and highly granular data across planning, operational and market roles. The Panel highlighted the expansion of open datasets, the publication of extensive curtailment data, network loading and CIM information, flexibility-market insights, connections-reform data and self-service tools. It also recognised NGED's use of smart meter and third-party data, including collaborations relating to electric vehicle charging, digital technology and weather information, and noted that new datasets had been selected in response to stakeholder value. The Panel considered that NGED strengthened data governance through data quality rules, cloud platform controls, validation, rationalisation and alignment with data best practice guidance. The Panel welcomed the breadth, granularity and accessibility of NGED's data provision and sought further insight into the processes supporting data quality and governance. In particular, members were interested in understanding the standards, assurance arrangements and governance processes used to promote accuracy, completeness and consistency across datasets. The panel session provided additional detail in this area, including clear examples of data quality controls and the	9.2

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	application of recognised standards such as Icebreaker One. The Panel also welcomed further information on dataset management, including refresh arrangements, methodology, limitations and quality assurance practices, alongside examples demonstrating how published data and tools had informed stakeholder decision-making in areas such as planning, connections, curtailment and investment. While the evidence presented was considered strong, the Panel noted that any assessment of sector-leading performance would ultimately need to be considered in the context of comparisons across all DSOs. For accessibility of data: the Panel thought NGED had made its data readily accessible through a central portal, machine-readable downloads, APIs, CIM network models, dashboards, visualisations and self-service tools. The Panel highlighted the redesigned portal, the Curtailment Estimator, FlexPortal, CIM Explorer and customer-facing connections information, together with a three-layer approach covering raw data, interpretive insights and decision support tools. It also noted strong usage figures and stakeholder engagement through webinars, user journey analysis, feedback loops and targeted capability building sessions. The Panel considered that NGED had applied recognised standards, including CKAN, Dublin Core metadata and CIM, and had consistently provided APIs. However, the Panel sought stronger evidence that improved accessibility had changed outcomes rather than only increased downloads or interactions. It asked for information on repeat use, API use, stakeholder decisions, time saved and barriers faced by less-resourced users.	
Flexibility market development	For design of distribution flexibility products, contracts and processes: the Panel thought NGED had demonstrated strong flexibility market development, with extensive use of standardised products and Open Networks arrangements, an independent and non-proprietary market structure, day-ahead procurement, improvements to Market Gateway and rapid growth in procured energy, registered assets, available capacity and dispatch events. The Panel highlighted FlexUp, Joint Utilisation Competition, revenue stacking and activity at high and low voltage levels and considered that stakeholder feedback had influenced platform functionality and product design. It also recognised work to include heat pumps, storage heaters and vulnerable households. The Panel welcomed the significant growth in NGED's flexibility markets, including increased procurement volumes,	9.1

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	participation levels and the continued development of products such as FlexUp and day-ahead flexibility. Members sought additional insight into the composition of activity across different voltage levels and use cases, including a more detailed breakdown of tendered, procured, contracted, dispatched and settled volumes. The Panel was also interested in understanding the distinction between BAU activities, trials and innovation-funded initiatives, the application of any Market Facilitator derogations, and the evolution of products such as FlexUp and demand turn-up. In addition, members welcomed further context on how NGED assessed industry-leading or first-of-a-kind claims relative to similar initiatives across the sector. For facilitator of market access: the Panel considered NGED to have demonstrated a strong commitment to reducing barriers to market access, supported by continued enhancements to Market Gateway, its Piclo partnership, day-ahead procurement, self-service onboarding, multiple participation routes and support for revenue stacking. These improvements were reflected in substantial growth in registered assets, available flexibility capacity and active flexibility service providers. The Panel also recognised NGED's efforts to broaden participation, including through the registration of heat pumps and vulnerable households, the removal of unnecessary exclusivity provisions, and closer operational coordination with NESO through data sharing and aligned dispatch arrangements. During the panel discussion, NGED provided further evidence of its use of standardised products, facilitation of stacking arrangements and coordination with NESO markets, reinforcing the strong performance evidenced in its submission. The Panel noted that additional evidence on areas such as active participation rates, realised customer benefits and participation by specific customer groups could further strengthen an already strong position and provide additional support for consideration against the highest scoring thresholds.	
Options assessment and conflicts of interest mitigation	For assessment of network options: the Panel thought NGED had established clearly defined and publicly available options assessment methods, including the Common Evaluation Methodology, DSOA, network development planning, DFES, secondary network planning and supporting analytical tools. It recognised the scale of the assessment	8.7

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	undertaken and highlighted evidence of coordinated planning with NESO, transmission and distribution companies, local authorities, industrial users and regional initiatives. The Panel considered the Grassmoor example to have shown how reinforcement and flexibility had been used together to maximise whole system value, and noted further examples involving mid-Wales, Walpole, LAEPs and strategic demand growth. However, the Panel thought the evidence had remained stronger on the number of schemes, tools and engagements than on how decisions had changed. It sought worked examples showing the original need, all options considered, counterfactual, valuation, selected and rejected solutions, stakeholder influence, delivery status and quantified cost, capacity and carbon outcomes. The Panel also asked for clearer evidence of cross-vector planning, the outcome of coordinated local-authority forecasting and how emerging demand, including data centres, had been translated into specific flexibility or investment decisions. This clarity was provided in the Panel presentation with a clear articulation of cross-vector engagement and how this has informed options assessment, decision-making, realising DSO Ambition and benefits. There was also a good description of working with NESO and delivering wider system benefits at lowest cost. For management of conflicts of interest: the Panel thought NGED had presented a mature formal governance model, including functional separation, published policies, executive and board oversight, a DNO-DSO steering group, independent scrutiny, defined operational interfaces, training, change management, three lines of defence and second-line assurance. The Panel also recognised that investment decisions and supporting information had been published and that stakeholder engagement and independent review had informed NGED's approach. It noted the introduction of a Directed versus Added KPI as a practical example of monitoring the DSO–DSO interface and improving delivery. The Panel considered NGED's governance framework to be well established, with clear evidence of functional separation, executive oversight, independent challenge and formal processes for identifying and managing conflicts of interest. Members welcomed the continued development of governance arrangements, including enhanced monitoring and reporting mechanisms, and recognised NGED's proactive	
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RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	approach to maintaining transparency as the DSO role evolves. The Panel sought further practical examples illustrating how the framework had operated in practice, including how actual or perceived conflicts had been identified, reviewed and managed, and how governance processes had informed decision making. Members were also interested in understanding how NGED continued to assess and refine its approach over time, including consideration of stakeholder feedback, the operation of the DSO Curtailment team alongside wider business functions, and the sharing of learning and best practice across the sector. Overall, the Panel considered NGED to have demonstrated a strong and mature approach to conflict of interest management, with additional practical examples potentially providing further support against the highest scoring threshold.	
Distributed energy resources (DER) dispatch decision making framework	The Panel thought NGED had demonstrated strong and improving visibility of distributed energy resources through telemetry, metering, LV monitoring, smart-meter data, Market Gateway information and forecasting tools. It recognised the published Operational Decision-Making Framework, updated primacy and dispatch rules, scalable digital infrastructure, extensive dispatch activity and daily publication of dispatch results. The Panel also highlighted reduced curtailment, improved constraint forecasting, the ICCP link, MW Dispatch, PODE and enhanced Risk of Conflict reporting as evidence of coordination with NESO and wider system value. However, the Panel sought a clearer breakdown of dispatch events by product, voltage level, asset type, constraint, procurement route, success and settlement. It also asked for examples in which primacy rules, Risk of Conflict reporting, MW Dispatch, PODE or other arrangements had changed a live operational decision, resolved an actual conflict or enabled participation in NESO markets. The Panel considered the evidence close to sector leading but thought leadership claims required comparison and stronger demonstration of operational conflict resolution and whole-system optimisation in practice.	9.2

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

Appendix 4. UKPN feedback

Criteria	Comments	Score
Delivery of DSO Benefits	For level of ambition: the Panel felt that UKPN's ambition remains very high, and is supported by large realised and forecasted benefits, which remain materially above the business plan forecast. It has delivered £223m of benefits in total in 2025/26, representing a 23% increase on 2024/25. The submission shows a strong articulation of benefits with transparent, bottom-up accounting of realised benefits, and causal pathways clearly outlined. These benefits are also explicitly mapped across consumers, DERs, system and environmental categories. Benefits have been quantified in line with established Green Book and Ofgem CBA methodologies, and appraisals are built on robust independent models. The submission is also transparent that the forecast for some benefits related to technical limits and connections acceleration has been revised due delayed connections reform timelines. UKPN has provided evidence of delivering wider system and environmental benefits through dynamic outage management and has worked with NESO and NGET to deliver system benefits through unlocking transmission constrained connections. The Panel also welcomed UKPN's support for local authorities through the integration of six new Local Authority Energy Plans (LAEPs), achieving the deepest integration in the sector, and the development of a charge point navigator tool. For benefits realisation: the Panel felt that UKPN demonstrated strong evidence of delivery of DSO benefits, supported by a clear benefits framework, robust performance tracking and evidence of proactive course correction. Realised benefit is clearly articulated in the submission, with detailed tracking across the RIIO-ED2 period and consistent reporting. Actual benefits are clearly and directly linked to DSO activities and mapped against UKPN's strategy for RIIO-ED2. The Panel did, however, consider that more detail on benefits attribution, counterfactuals and the impact of connections reform changes would have been beneficial. UKPN has established a comprehensive KPI framework covering key DSO activities, including forecasting, flexibility,	9.6

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	curtailment and connections, with an independent assurance framework in place to support credibility. The Panel considered UKPN to have proactively adapted its approach to maximise benefits across several areas, with evidence of KPI-driven changes, including improvements to demand forecasts and support provided for high curtailment sites. and changes in direction following delays to connections reform to prepare for customer readiness. The Panel also recognised UKPN's delivery of additional outputs to maximise benefits for customers, including the Connections Lab, demand turn-up initiatives and outage optimisation activities. UKPN has also pioneered the Local Authority Common Ask framework alongside neighbouring networks to standardise data templates nationwide.	
Data and information provision	For scope, granularity and accuracy of data: the Panel felt that UKPN demonstrated a strong expansion of datasets and analytical tools, as well as clear improvements in data quality, governance and integration and strong expansion of datasets and analytical tools. UKPN provides a wide range of datasets spanning all core planning, operational and market facilitation roles, supported by APIs, methodology statements and data quality information. The panel also recognises the significant progress UKPN has made in improving data quality and governance, with its Ofgem's Data Best Practice maturity score improving from 62% in 2023/24 to 84% in 2025/26. It has achieved this using automated quality controls, unified systems and enhanced metadata completeness. The Panel saw strong evidence of the use of third-party data and advanced analytics, with smart meter data and external datasets integrated into the forecasting and planning processes. UKPN has collaborated with NESO using smart-meter power-factor data, cable information and reactive power modelling to improve understanding of the whole-system impacts of LCT connections and combined multiple third-party datasets through LAEP+. The Panel welcomed the publication of additional datasets and tools in response to stakeholder needs, including datasets for large demand, data centres and local planning, and the development of a tool to streamline the site selection process for rooftop solar. UKPN also provided strong evidence of sector leadership using open-source tools, shared methodologies and	9.7

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	advanced modelling capabilities, including through the development of the UKPN Python toolkit. For accessibility of data: the Panel felt that UKPN demonstrated strong performance, with evidence of extensive data availability through APIs, tools and dashboards, strong user engagement and adoption, and a clear stakeholder-oriented approach to data provision. It has seen high usage levels of its Connections Lab and ODP and made technology improvements to the ODP to significantly reduce download times for large datasets. Stakeholder needs have been met through additional support for data centre planning and the development of tools such as Opportunity Finder. Data is available via APIs in a standardised, machine-readable format and hosted in a logical, secure, centralised repository. UKPN provided evidence of stakeholder engagement driving improvements in data provision, with the development of local dashboards and customer specific tools and dynamically tailored data provision via structured annual open data surveys. This feedback loop informed the launch of the Regional Energy Dashboard and enhancements to the Network Planning Tool have also improved queue data quality within Connections Lab, supporting customers through Connections Reform. UKPN has demonstrated strong performance in the provision of network models and APIs, including by publishing its Long-Term Development Statement this year in a fully digital, machine readable Common Information Model format.	
Flexibility market development	For design of distribution flexibility products, contracts and processes: the Panel felt that UKPN demonstrated a mature and industry-leading approach to flexibility market development, supported by strong operational evidence and stakeholder input. It has achieved strong alignment with industry rules and frameworks, including implementation of the Market Facilitator standard flexibility market rules, with 99% of flexibility volumes being tendered through standard Open Networks products. UKPN has shown evidence of extensive stakeholder engagement and feedback-driven design. Feedback gathered through its Flexibility Council has been used to inform proposals on metering and standard contract implementation, and collaboration with flexibility providers	9.4

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	helped provide investment signals to deploy batteries in strategic locations. UKPN provided evidence of unlocking value from flexibility services in more nascent use cases such as voltage management and constraint management on the low-voltage network, which they have expanded to 50 sites. It has also delivered lower costs for consumers through effective competition, achieving a 53% reduction in average long-term contract utilisation fees over the past six years and a 63% reduction in day-ahead dispatch prices. With strong participation levels, a range of opportunities available across markets and innovation in areas such as demand turn-up and day-ahead markets, the Panel considered UKPN to be setting an industry-leading benchmark. For facilitation of market access: the Panel felt that UKPN demonstrated strong performance, with clear evidence of improved access for new customer groups, strong growth in participation, and effective coordination with NESO. It has built on existing day-ahead market provision, demonstrated new value drivers for flexibility, including voltage management solutions, and increased participation across domestic and distributed energy resource providers. UKPN has provided evidence of market openness and revenue stacking, with flexibility contracts avoiding exclusivity clauses. It also supports whole system market access through automated daily checks across 350,000 meter points to enable more assets to provide demand turn-up to NESO in the Demand Flexibility Service. UKPN has also demonstrated ambition extending beyond distribution network requirements to wider system optimisation, through its support for demand turn-up, innovation in voltage management, active operational data sharing, stacking opportunities, growth in flexible connections capacity, and strong whole-system market coordination.	
Options assessment and conflicts of interest mitigation	For assessment of network options: the Panel felt that UKPN demonstrated a strong and systematic approach to network options assessment, with a robust DSOA and forecasting framework supported by extensive integration of local and national planning inputs. UKPN's evaluation methodology is clearly defined and accessible through its published DSOA outcomes and methodology, and the Planning Decision-Making Framework,	9.3

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	which is accessible online. This supports transparency and stakeholder understanding of decision making. It also provides transparency on potential future flexibility needs through the System Needs Register. Planners follow a robust and consistent approach to assessing network options, by applying standardised ENA Common Evaluation Methodology cost-benefit tools alongside sensitivity modelling and site-by-site and portfolio optimisation. The submission provided evidence of proactive engagement across the energy sector and with network users. This year, NESO inputs including the tRESP and CP2030 inputs were incorporated into UKPN's network forecasting, along with 15 LAEPs covering 66 local authorities and housing data covering all 133 local authorities. Joint options development was conducted with NESO and NGET and further data was shared with NESO to support whole-system decision-making. It also conducted extensive stakeholder engagement through DSOA roundtables, flexibility forums, DER customer forums and events targeted at IDSO customers. UKPN has demonstrated tangible outcomes and consumer benefits from this approach. This year, its DSOA has market tested £244m of investments and awarded £1.2m of flexibility to deliver 30MW of capacity and defer £55m of traditional reinforcement. For management of conflicts of interest: the Panel felt that UKPN continues to demonstrate a strong approach to managing conflicts of interest through its strong governance framework and legally separate, independent DSO structure. Governance arrangements are clear, independently scrutinised and transparent, with impartiality secured via executive-level accountability, an independent Supervisory Board, external assurance, and a formalised DNO-DSO Operational Agreement. This year, UKPN expanded its Operational Agreement through additional service level agreements covering curtailment, long-term forecasting and DSOA input data. UKPN also evidenced structured processes for identifying, tracking and managing emerging conflicts, including horizon scanning and board-level consideration of new risks associated with evolving sector roles and interactions with NESO. UKPN has provided clear evidence that investment decisions, methodologies and supporting datasets are published and accessible to stakeholders, supporting transparency and challenge. While using this approach, UKPN has	
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RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	demonstrated strong performance outcomes, reporting lower DSO related costs per customer than the industry average, while achieving the highest customer satisfaction score among DSOs. The Panel would, however, like to highlight the need for more causal evidence of how this operational structure is driving exceptional delivery performance, or examples of specific operational decisions altered as a result of identified conflicts. Whilst UKPN provided evidence of external validation of its approach and described how its business separation arrangements support deliver and customer outcomes, it did not clearly demonstrate that the legal separation approach is backed up by compelling evidence. UKPN demonstrated extensive stakeholder engagement and a proactive approach to identifying emerging sector risks and potential conflicts associated with changing national roles and responsibilities.	
Distributed energy resources (DER) dispatch decision making framework	UKPN continues to demonstrate sector-leading performance in DER visibility, dispatch and integration with NESO. The Panel noted a high level of DER visibility and monitoring, with comprehensive visibility of almost 10GW of installed DER capacity, physical telemetry at 100% of 33kV+ sites, metering at 68% of 11kV nodes, and 11,768 active low-voltage monitors. Detailed monitoring is supported by control room integration, continuous customer engagement and the provision of operational data to customers to help them make business decisions. UKPN has a clearly defined and transparent operational decision-making framework, validated through stakeholder engagement and its Flexibility Forum, and supported by published dispatch logic and auction processes. Real-time dispatch is governed by an objective framework that evaluates choices day-ahead across standard primacy rules, while active monitoring and management of curtailment supports customer outcomes. The Panel welcomed strong evidence of scalable and fully automated dispatch systems, with more than 15GWh dispatched through automated processes in 2025/26. UKPN provided evidence of a high level of coordination and communication with NESO, with operational ICCP links across all licence areas, MW dispatch, and enhanced bi-directional data exchange capabilities for both operational and planning use cases. Evidence demonstrated advanced whole-system optimisation and coordination to enable earlier	10

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	connections, enhanced outage management and cross-market participation.	
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RIIO-ED2 Distribution System Operation Incentive Report 2025/26

Appendix 5. SPEN feedback

Criteria	Comments	Score
Delivery of DSO Benefits	For level of ambition: the Panel felt that SPEN demonstrated a clearer level of ambition and stronger benefits framework compared to last year, with £14m in net direct benefits delivered in 2025/26. This brings the cumulative RIIO-ED2 total for SPEN to £37m in direct benefits, with a further £608m in indirect benefits. However, in general, the Panel found that evidence was light and at summary level in many areas and would have liked to have seen more substantive evidence, use cases and examples linked to demonstrating the criteria. SPEN provides a structured and internally consistent benefits framework linking DSO activities, KPIs and monetised outputs, with theory of change models supporting clear segmentation across beneficiary groups. The benefits framework is aligned with Green Book principles and standardised ENA methods, but the benefits narrative relies heavily on indirect benefits, retrospective recalculation and assumptions that are not fully transparent, making it difficult to distinguish operational performance improvements from methodology changes in some areas. SPEN also evidenced wider system ambition through the expansion of Constraint Management Zones, deployment of demand turn-up to reduce curtailment and the acceleration of connections. As part of its work to improve coordination across the transmission-distribution boundary, SPEN has been progressing several joint initiatives with NESO to improve DER participation in NESO markets. Some of these initiatives, however, are still in progress SPEN demonstrated evidence of quarterly engagement with local authorities and provided some case studies of cross-vector operations with the gas sector. For benefits realisation: the Panel found that SPEN's submission demonstrated continued improvement in its approach to benefits realisation and appeared to respond positively to previous feedback by introducing more detailed KPIs and clearer activity-level evidence. SPEN provided clear reporting of realised and enabled benefits, quantified using the ENA benefits framework and a social value framework, and with links between DSO strategy, activities and benefits clearly explained. However, the panel noted that a significant share of the reported value remains in enabled or indirect benefits rather than directly realised value.	7.9

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	A strong KPI process is set out with structure collection, validation, dashboard tracking and theory of change integration providing a robust monitoring framework, although more detail on the KPIs themselves is required to demonstrate outcomes, rather than simply describing the process. SPEN reported £14m of net direct benefits in 2025/26 and £608m of indirect benefits, with realised benefits coming from flexibility deferral, planned outage management, LV monitoring and fault prediction. The Panel welcomed evidence of adapting plans to increase benefits, including through the SocialFlex initiative to integrate vulnerable social housing communities into demand response, and course-correction through improvements to LV monitoring deployment and demand turn-up development. SPEN has also expanded the capacity delivered through StormFlex. While progress is evident, more evidence of material customer-level benefits being delivered at scale would be required for a higher score. Stronger evidence distinguishing new DSO capabilities from the scaling of existing activities would also increase confidence in realised customer value.	
Data and information provision	For scope, granularity and accuracy of data: the Panel recognised SPEN's strong year-on-year improvement in data provision and quality. SPEN demonstrated comprehensive data provision across planning, operational and market roles, including the publication of all DSO Baseline Expectation datasets and several new ones. SPEN also addressed several stakeholder Open Data Requests and refreshed its stakeholder-informed Data Roadmap using evidence from surveys, webinars, DSO events and direct stakeholder feedback. The Panel noted improvements in data quality management, including the deployment of data governance platform Informatica, the completion of large volumes of data quality checks, and publication of Data Quality Assessments. However, data quality is self-assessed by a separate internal team and not independently assessed. Evidence showed Embedded Capacity Register completeness improving to 99.99% and data validity improving to 86.5%. The Panel also welcomed the development of the network digital twin tool NAVI, and the increased use of smart meter and third-party data to support network planning and forecasting, although more quantification of the value of this data for decision making is needed. While SPEN has demonstrated strong	8

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	progress in this area, the evidence did not support the Panel scoring SPEN as sector leading. For accessibility of data: the Panel recognised that SPEN has made significant improvements in the accessibility of its data and information provision. SPEN demonstrated a structured, stakeholder-led approach, using evidence from its Open Data Survey, webinars, DSO events and direct engagement to identify priorities and usability barriers. This resulted in new datasets, alongside new feature pages, dashboards and an interactive Data Release Roadmap. SPEN has strengthened its Open Data Portal as the primary access point for open data, consolidating datasets, documentation and tools into a single platform with improved navigation, filtering, and visualisations. The submission outlines that data is made available in standard machine-readable formats with expanded API functionality and custom API generation to support integration into stakeholder workflows, although more clarity on the extent of API coverage and user impact is needed. SPEN also demonstrated alignment with industry standards through the publication of its LTDS network model in Common Information Model format. The Panel noted that stakeholder satisfaction remains mixed and considered that stronger evidence of how feedback directly changes data provision priorities would strengthen the submission.	
Flexibility market development	For design of distribution flexibility products, contracts and processes: the Panel found SPEN to have shown an increase in flexibility market scale and activity compared with last year, with 710MW tendered, 185MW contracted and 3,196MWh delivered. However, there is a continued reliance on pilot or emerging products which are not yet being delivered at scale. SPEN has furthered market standardisation through early adoption of Elexon's Flexibility Market Rules and full implementation of Open Networks deliverables. Evidence was provided of stakeholder engagement through events, webinars and individual engagements leading to the removal of provider-specific barriers and the development of flexibility service provider personas to tailor standard contracts to providers' needs. There is also some evidence of progress in more nascent areas through the introduction of its day-ahead demand turn-up market and the expansion of low-voltage flexibility	7.1

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	markets. SPEN has also expanded its StormFlex initiative to support storm response and shared learnings with other DSOs to drive wider adoption. More work is needed, however, to scale up these offerings and transition services into business as usual. SPEN's improvement in this area is clear, but the evidence provided still suggests that it is behind other DSOs in some areas of flexibility market development. For facilitation of market access: the Panel felt that SPEN has also demonstrated progress in facilitating flexibility market access and supporting participation, with significant increases in both the number of registered providers and registered capacity. The submission provided a clear explanation of enabling services which have contributed to this increase such as market engagement and persona-based guidance, alongside a clear explanation of platforms and onboarding arrangements. SPEN also outlined improvements to registration processes, contractual arrangements and stakeholder engagement, which has helped to reduce barriers to participation, although more practical evidence of how this has made participation easier was needed. Market stacking and participation has also been supported by maintaining markets without exclusivity clauses. SPEN provided some evidence of coordination with NESO, but not yet fully realised operational integration. SPEN is using ICCP links to coordinate with NESO in one licence area and outlined plans to develop further links in another, although this is not yet in place. Operational coordination and data sharing is focused on existing reports (eg Week 24, Week 50 and tRESP engagement) rather than new data or channels. The Panel would require evidence of fully realised operational integration of NESO coordination and delivered system benefit outcomes to meet the scoring criteria for a higher score. SPEN also presented evidence of Constraint Management Zone operation and associated coordination with NESO. The submission clearly outlined an ambition to further increase coordination with NESO and scale up the delivery of demand turn-up markets, although these outcomes remain prospective.	
Options assessment and conflicts	For assessment of network options: the Panel considers SPEN to have substantially improved its options assessment narrative compared with last year, with a clearly defined	7.9

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

of interest mitigation	approach to DSOA, regional planning and whole-system engagement outlined in the submission. The methodologies for DSOA, DFES, LTDS and NDP are all published and stakeholder access is supported by feature pages and dashboards in the ODP. SPEN's options assessment methodologies provide a consistent approach to valuing alternatives to reinforcement, with a decision making framework supported by the Ofgem CBA and CEM tool. An independent audit of its DSOA and decision making framework further supports credibility. The evidence demonstrates extensive cross-sector engagement with local authorities, regional bodies, GDNs, transport bodies, NESO industrial clusters and other network operators. This has enhanced the options assessment process through assumptions alignment, joint solutions identification and the incorporation of regional and cross-boundary developments. Through this SPEN has achieved strong alignment of assumptions, with regional forecasts within 1% of tRESP outputs. While strong modelling and process evidence was provided, the Panel felt that stronger practical demonstration of how the methodology has changed investment choices and delivered least-cost whole-system outcomes would be required for a higher score. For management of conflicts of interest: the Panel felt that SPEN demonstrated a significantly strengthened approach to managing conflicts of interest this year, supported by an expanded DNO-DSO Operating Framework, a conflict of interest management plan and the establishment of a DSO Advisory Group to provide independent oversight. SPEN provided strong evidence of formalised governance and transparency. It uses a structured governance framework with executive accountability and board-level visibility embedded within the approvals process. It has also updated its DNO-DSO Operating Framework with two new codes of practice for Network Planning and Network Operations. Investment decision outcomes are publicly available through planning publications and the Open Data Portal, increasing transparency and accessibility. SPEN also provided evidence of stakeholder engagement being used to develop its conflict of interest mitigation plan and operating framework, although the Panel considered that further detail of how this evidence base is used in practice is needed.	
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RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	SPEN also provides some evidence of applying best practice from other DSOs and sharing best practice internationally through ongoing benchmarking sessions with European DSO design teams. While the submission outlined a strong governance model, the Panel considered that further evidence of practical application, including examples of conflicts being logged, escalated or influencing decisions, would improve the quality of the submission and scoring. The DNO-DSO Framework is also still at a high level in comparison to other DSOs and more evidence of practical validation of the model is needed.	
Distributed energy resources (DER) dispatch decision making framework	SPEN has made significant progress in strengthening DER visibility, dispatch frameworks and infrastructure. The submission provided evidence of improvements in ECR completeness, LV monitoring and flexibility asset visibility, enabling data-led flexibility dispatch decisions. SPEN has improved its decision-making framework by separating planning and operational activities, clarifying how curtailment and flexibility dispatch are triggered, prioritised and communicated. It has provided evidence of using an efficient flexibility dispatch platform which provides automated dispatch with clear contractual rules to avoid hard coding operational capabilities and has implemented the Common Dispatch API to standardise dispatch instructions. SPEN provided evidence of progress in coordination with NESO through greater operational data sharing via ICCP links, but whole-system coordination remains evolving and is partly dependent on future ICCP delivery in SPM. It has embedded ENA primacy rules within control room operations and is in the process of implementing Market Facilitator primacy rules, but more operational examples of conflict resolution are needed. It is also undertaking cross-voltage simulation studies inside the NAVI model to understand how consumer-led flexibility impacts transmission constraints. Further evidence of live operational outcomes arising from whole-system coordination, such as increased DER participation in NESO markets, would be needed to improve scoring in this area.	7.4

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

Appendix 6. SSEN feedback

Criteria	Comments	Score
Delivery of DSO Benefits	For level of ambition: the Panel felt that SSEN provided a strong narrative linking its DSO strategy to delivered outcomes, clearly articulating how its DSO Accelerator Programme and wider business-as-usual activities have translated into measurable benefits. It has also demonstrated evidence of increased benefits from DSO activities year-on-year, including a substantial increase in Year 3 reported benefits, and a strong increase in the use of flexibility services. The Panel did, however, note that the theory of change methodology used could be more clearly explained. The benefits presentation also changed materially this year, and more clarification was needed on gross/net benefit and benefit accrual treatment, alongside an explicit reconciliation of connections reform impacts on forecasts from previous years. The submission provides a structured and well evidenced breakdown of benefits by stakeholder group, including domestic and commercial customers, distributed energy resource developers, flexibility service providers, local authorities, whole-system partners and wider societal benefits. Benefits are reported using consistent price bases and are calculated using standardised ENA methodologies which are aligned with Ofgem CBA and HMT Green Book principles. The use of independent assurance and transparent assumptions further supports the credibility of the assessment. SSEN has demonstrated promotion of wider-system benefits, particularly through accelerating connections ahead of both distribution and transmission reinforcement and strengthening coordination with NESO, which together has delivered £103m of whole-system benefits in 2025/26. SSEN has also shown a proactive and structured role in regional cross-vector investment planning through the publication of Strategic Development Plans covering all Grid Supply Points, engagement with local authorities on Local Area Energy Planning and the use of the LENZA tool. There was, however, less articulation of cross-vector coordination outside Local Authority engagement (eg with GDNs and transport bodies). For benefits realisation: the Panel felt that SSEN's submission demonstrated strong improvements in the	8.9

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	delivery and articulation of DSO benefits, with £131.44m net benefits delivered in 2025/26 and £288.26m net benefits across ED2 to date. This includes 331.4MW of accelerated connections, 1,335MWh of dispatched flexibility, and £354m of deferred reinforcement. Quantified benefits were demonstrated on a year-by-year basis and assessed against DSO strategic RIIO-ED2 outcomes, although the submission would benefit from a clearer explanation of how MW of accelerated connections translate into reported net benefits. The connection between individual delivery actions and aggregated benefit metrics could also be more explicitly narrated. The Panel found good evidence of robust monitoring and governance arrangements for tracking benefits. SSEN reports performance through a structured framework for benefit identification, tracking and reporting, underpinned by a Theory of Change and a defined KPI suite. Performance is monitored internally monthly by the DSO Sub-Committee and published externally every quarter, with oversight provided through DSOAB review. Its metrics are also consistent with the ENA framework. The submission also demonstrated evidence of learning and adaptation, with some evidence of course-correction. This includes improvements SSEN has made to benefits reporting, KPI refinement following stakeholder feedback and adjustments to flexibility markets to improve utilisation and realised value, rather than purely focussing on volume-led outcomes. It has also adapted in response to delays to Connections Reform to still realise benefits from additional connected capacity. SSEN has also delivered additional customer-focused outputs including through the acceleration of affordable housing and the development of the HOMEflex scheme.	
Data and information provision	For scope, granularity and accuracy of data: the Panel felt that SSEN provided strong evidence of expanded data provision and quality improvement, which appears to respond directly to last year's feedback on data quality and accessibility. The submission evidenced comprehensive data provision across planning, operational and market roles, exceeding baseline DSO expectations, with enhancements driven by stakeholder feedback. This includes datasets pertaining to DFES, DSOA, NeRDA, flexibility market opportunity data, outage and curtailment data and dispatch outcome data. It	8.9

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	has also demonstrated extensive use of third-party datasets through the LENZA platform. The Panel recognised clear steps to improve data quality through enhanced internal modelling reviews, improved asset annotation standards, network-wide data clean-up, and an automated Data Quality Engine. It also reported 50% of datasets being independently Icebreaker One Level-1 assured. The Panel did, however, feel that the approach to managing data compatibility and consistency across diverse datasets could have been better articulated. The panel noted the provision of daily-updated street-level half-hourly usage data via an open API and the strong position of SSEN, but overall, the evidence did not support scoring SSEN as the sector leading DSO. For accessibility of data: the Panel felt that SSEN has demonstrated strong data accessibility through its API provision, network models and ODP, which provides structured navigation, user-specific entry points and a new insights tool. It has also improved alignment with wider industry standards, including through publishing LTDS datasets using the latest ENA aligned version of the Common Information Model. The Panel recognised evidence of extensive stakeholder engagement, including data surgeries, feedback surveys and use-case mapping for local authorities, developers and flexibility market participants. This directly informed a refresh of its RIIO-ED2 data strategy, portal improvements and the co-design of the Centralised Network View geospatial tool. The panel noted evidence of extensive API-based access to support automated decision making and third-party integration at scale but felt further evidence to demonstrate consistent API use across high-value datasets was needed.	
Flexibility market development	For design of distribution flexibility products, contracts and processes: the Panel felt that SSEN has demonstrated strong evidence of mature flexibility products, contracts and processes, supported by increasing operational use of flexibility markets. The submission reported nearly 1GW of flexibility procured, 1,335MWh dispatched, an 82.5% bid acceptance rate and a utilisation rate of 73%. The Panel noted SSEN's broad range of routes to market, including long-term, monthly, daily and Day-Ahead markets, alongside domestic load management and island stability services.	8.7

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	The submission provided evidence of alignment with Market Facilitator rules and products, use of standardised products and contracts, and continued improvements in response to stakeholder feedback. Evidence of extensive engagement with flexibility providers was supported by examples of changes in response to stakeholder feedback including simplifying onboarding processes and day-ahead market changes. The Panel also welcomed some evidence of activity in nascent areas, including the development of Smart Signal as an implicit flexibility framework, RTS transition support and Community Smart Access initiative. Again, SSEN had a very strong submission, but could not be marked as the industry leading DSO. For facilitation of market access: the Panel felt that SSEN provided strong evidence that it is improving market access and enabling effective participation in flexibility markets, achieving a 37% increase in flexibility procured compared to 2024/25. The submission demonstrates how SSEN enables third-party participation through open platforms, transparent processes, API functionality, 24-hour registration and stakeholder-led platform development. The depth and breadth of market access, participation and take-up are also well evidenced, and the Panel considered the introduction of Day-Ahead markets, contract simplification and reduced barriers for domestic and small-scale providers to be positive developments. The Panel did, however, consider that further evidence of how participation is simpler in practice and on the approach to limiting exclusivity clauses was needed. Strong evidence was also provided of DSO-NESO coordination through ICCP links, real-time operational data sharing, conflict identification and support for whole-system optimisation. SSEN provided evidence of using flexibility as a whole-system tool, with the implementation of Bilateral Connection Agreement variations to enable 429MW of DER dispatch in NESO markets and work to optimise DER dispatch across boundaries. Some elements of this coordination are early stage, however, and more examples of things like avoiding risk conflicts would improve the quality of the submission.	
Options assessment and conflicts	For assessment of network options: the Panel felt that SSEN demonstrated good performance in this area, with	8.7

RIIO-ED2 Distribution System Operation Incentive Report 2025/26

of interest mitigation	evidence of extensive collaboration with stakeholders and other system actors in the options assessment. There is strong evidence that SSEN has improved the maturity of its options assessment processes through its published DSOA methodology, Strategic Development Plans (SDPs) covering the entire licence area, Whole-system Register and the 10-year DSOA horizon. However, the Panel felt that more evidence of the practical value of these interventions, especially at the secondary network would improve the quality of the submission. The submission demonstrates a consistent approach to assessing reinforcement, flexibility and energy efficiency options, supported by independent assurances to confirm the process is being consistently followed. This year, SSEN consulted on its DSOA methodology and incorporated stakeholder feedback by increasing SDP granularity. It has provided evidence of active engagement with NESO and local authorities and made improvements to ICCP data sharing off the back of transmission sector engagement. There was, however, limited evidence of engagement with other cross-sector partners (eg GDNs). SSEN's strategic development plans demonstrate long term planning and efficiency in decision making, and the link between different processes and methods across short and long term timescales are well set out. SSEN also demonstrated evidence of iterative processes which can drive long-term economic and efficient solutions. For management of conflicts of interest: the Panel considered this to be one of SSEN's most improved areas, with a broader and more transparent governance approach set out in the submission. SSEN set out clear governance, executive accountability and conflict identification processes. The Distribution Governance and Investment Framework, DSO Advisory Board, DSO Sub-Committee, conflicts-of-interest register, independent assurance and functional separation provide strong evidence of a formalised DNO-DSO relationship and proportionate oversight. More practical examples of conflicts being identified and mitigated, or leading to a change in decision are needed, however. Clear, separate and published decision-making frameworks continue to be independently scrutinised by the DSO Advisory Board, with 95 board recommendations actioned, demonstrating independent challenge translating directly into delivery.	
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RIIO-ED2 Distribution System Operation Incentive Report 2025/26

	Decisions are published and clearly accessible including the DSOA, SDP, associated methodologies and assurance reports. It also publishes a quarterly DSO Interests Report detailing pre- and post-mitigation risk scoring across its three primary roles. SSEN provided some evidence on stakeholder engagement leading to improvements to its approach, although more evidence of wide-ranging stakeholder buy-in could have been provided. The submission also could have provided a clearer evidence base and justification for the DNO-DSO operating model used. SSEN also demonstrated clear liaison with other DSOs, NESO and the ENA, and other sectors. It has also launched a centrally managed, public conflicts of interest register with quarterly independent assurance.	
Distributed energy resources (DER) dispatch decision making framework	SSEN provided evidence of robust and mature DER integration and coordination. The submission clearly demonstrates comprehensive and robust visibility of DER characteristics to inform accurately, timely and coordinated dispatch instructions. This is supported using ANM, DERMS, SCADA and the NeRDA system. SSEN demonstrated a clear and transparent Operational Decision Making Framework, with published rules and optimisation processes. The Panel also noted evidence of automated, interoperable dispatch systems, with merit-order logic fully embedded into control room decision making, enabling delivery at scale. Evidence was provided that SSEN's coordination with NESO has deepened through improved real-time data sharing, enhanced forecasting and clearer governance, leading to significant increases in DER participation in NESO markets. SSEN has also evidenced large-scale identification and mitigation of NESO-DSO conflicts, with over 2,000 potential conflicts identified and mitigated through enhanced risk of conflict reporting in live operations, although further detail on how these risks were handled would have improved the quality of the submission.	8.6