

# Central Asset Register Proposals: Draft Impact Assessment

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## Table of Acronyms

| <b>Acronym</b> | <b>Definition</b>                                    |
|----------------|------------------------------------------------------|
| BSC            | Balancing and Settlement Code                        |
| CAR            | Central Asset Register                               |
| DESNZ          | Department for Energy Security and Net Zero          |
| DNO            | Distribution Network Operator                        |
| ED3            | Electricity Distribution Price Control 3             |
| EMPRIS         | ElectraLink's data management and analytics platform |
| FMAR           | Flexibility Market Asset Registration                |
| IA             | Impact Assessment                                    |
| MVP            | Minimum Viable Product                               |
| PoC            | Proof of Concept                                     |
| RIIO           | Revenue = Incentives + Innovation + Outputs          |

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## 1. Executive Summary

### Purpose

- 1.1 The primary purpose of the Impact Assessment (IA) is to focus on the relative value for money of the Elexon and ElectraLink delivery models, rather than the broader policy case for improving asset visibility. To frame the relative value for money comparison, it also gives a brief overview of the benefits relative to the counterfactual.<sup>1</sup>

### Scope of this IA

- 1.2 Responses to the December consultation indicated broad support for improving asset visibility through a Central Asset Register (CAR), reflecting the challenges posed by the current fragmented data landscape. While respondents generally supported further intervention, many highlighted the need for additional evidence on costs, benefits and value for money before a final decision is taken.
- 1.3 Although stakeholders requested further evidence on costs, benefits and value for money, the purpose of this IA is not to revisit whether improving asset visibility could deliver benefits. Rather, it adopts a relatively *low-regrets* assumption that improved asset visibility is likely to deliver value and focuses on the comparative assessment of the two delivery approaches that emerged from consultation responses: an Elexon-led CAR and an ElectraLink-led CAR.

### Options Assessed

- 1.4 Accordingly, this IA focuses primarily on comparing the Elexon and ElectraLink delivery models, whilst providing contextual evidence on the potential incremental benefits associated with improved asset visibility relative to the counterfactual. It is not intended to provide a comprehensive assessment of the policy case for introducing a CAR.

### Evidence Base

- 1.5 The evidence draws on previous consultation responses, stakeholder engagement, provider submissions and Ofgem analysis. Where evidence differs across submissions, the latest available evidence is used. Confidence in the evidence base is considered explicitly, particularly where cost estimates, delivery assumptions or timelines differ materially between providers.

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<sup>1</sup> See Section 2: Benefits Relate to the Counterfactual.

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## Nature of this Assessment

- 1.6 This IA sets out Ofgem's emerging thinking on the relative merits of the assessed options. It is not intended to be a comprehensive cost benefit analysis or the final IA accompanying our decision.
- 1.7 This draft IA is intended to support consultation and inform Ofgem's decision-making. It applies relevant IA principles to the comparative assessment of the Elexon and ElectraLink delivery approaches, including consideration of costs, benefits, delivery risks and value for money.

## Assessment

- 1.8 The assessment compares the Elexon and ElectraLink delivery models in terms of cost, delivery confidence, implementation risk and overall value for money. It also provides contextual evidence on the scale of benefits associated with successful CAR implementation to help assess whether the costs of the alternative delivery models appear proportionate.

## 2. Benefits Relative to the Counterfactual

- 2.1 Existing asset visibility arrangements should show *some* continual improvements in the absence of a CAR through ongoing reforms and bilateral data-sharing arrangements; however, it is important not to over-state this, with data expected to remain fragmented in the absence of a CAR. These arrangements encompass the *counterfactual* (what would happen in the absence of a CAR).
- 2.2 Even so, stakeholders have identified continuing challenges associated with fragmented asset information, inconsistent standards and incomplete visibility. A CAR aims to address some of these challenges by creating a single source of truth for asset data and, thereby, improving asset visibility. The potential benefits described in this assessment should therefore be interpreted as incremental to the counterfactual.

## 3. Options and Delivery Models

- 3.1 The key characteristics of the two delivery models are summarised below. The reasons for considering Elexon and Electralink are given in the consultation.

### Option 1: Elexon FMAR-Based CAR

- **Delivery model:** CAR delivered by building on FMAR infrastructure following its completion.
- **Funding model:** Costs recovered through Balancing and Settlement Code (BSC) arrangements and targeted at DNOs via code modifications. DNOs would then recover those costs through RIIO-ED3.

- **Governance model:** Existing Market Facilitator and FMAR governance and accountability arrangements.

#### **Option 2: ElectraLink EMPRIS-Based CAR**

- **Delivery model:** CAR delivered through expansion of the existing EMPRIS platform.
- **Funding model:** DNO-funded approach with costs recovered through RIIO-ED3 arrangements.
- **Governance model:** New CAR-specific governance arrangements building on existing governance structures.

## **4. Costs, Benefits and Assessment Approach**

- 4.1 This IA is intended primarily to assess the relative value for money of the Elexon and ElectraLink proposals for delivering a CAR. Previous consultation and stakeholder engagement indicated broad support for intervention to address challenges associated with fragmented asset information, and identified centralised platform approaches, of which FMAR-based and EMPRIS-based were indicated as the most credible options. Accordingly, this assessment focuses on comparing the relative value for money of the Elexon FMAR-based and ElectraLink EMPRIS-based proposals.
- 4.2 While the assessment considers the potential benefits associated with improved asset visibility relative to the counterfactual, this is intended to provide context on the scale of impacts associated with successful implementation rather assess the policy case for a CAR. The purpose of this assessment is to compare the relative value for money of the Elexon-based and ElectraLink-based proposals and assess whether their delivery costs appear proportionate to the benefits expected from improved asset visibility.

### **Illustrative benefits relative to the counterfactual**

- 4.3 The benefits of CAR are expected to arise through improvements in network planning, forecasting and operational decision-making, enabled by providing a more complete and consistent understanding of connected assets. This can help network operators make more confident use of existing network capacity, better target reinforcement activity and avoid unnecessary investment driven by incomplete information.
- 4.4 Previous analysis suggests that even modest improvements in network utilisation could generate substantial benefits. For example, a 1% increase in network utilisation was estimated by DESNZ to avoid between £0.6bn and

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£1.4bn of network investment by 2050.<sup>2</sup> While there is uncertainty regarding the proportion of these benefits directly attributable to a CAR, the estimate provides an indication that even modest improvements in asset visibility could generate benefits materially larger than expected delivery costs. This estimate should also be considered conservative, reflecting only a modest increase in network utilisation and avoided reinforcement expenditure.

- 4.5 Given that both delivery models are intended to provide the same CAR functionality, benefits are assumed to be broadly equivalent between Elexon and ElectraLink. However, differences in when those benefits are realised affect their present value.<sup>3</sup> Earlier delivery increases the present value of benefits, all else equal. Therefore, delivery timing, implementation risk and costs are the key factors considered in the remainder of this assessment.
- 4.6 The assessment has not quantified any potential benefits arising from future alignment between a CAR and potential future installer obligations. Greater coordination could reduce duplication and administrative costs by enabling both functions to build on a common data source. However, the scale of any such benefits remains uncertain and depends on future decisions including the design and delivery of installer obligations. Accordingly, these potential benefits have been considered qualitatively but are not included in the central assessment. Ofgem is working closely with DESNZ to coordinate the two processes and communicate outcomes in a consistent manner. Benefits would also be expected to increase over time as asset coverage, data completeness and user adoption mature.

### **Cost Assessment**

- 4.7 ElectraLink's estimates are supported by a more detailed breakdown of activities and have been refined through its Proof of Concept (PoC) and internal governance processes. By contrast, Elexon's operating costs are derived using benchmark assumptions, with annual costs assumed to represent around 25-30% of FMAR capital expenditure, and limited evidence has been provided regarding the appropriateness of this assumption for CAR. The implications of these differences are considered in the Cost Confidence assessment below. At face value, Elexon's proposal appears lower cost.

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<sup>2</sup> Internal DESNZ analysis using the Distribution Network Model. Network headroom refers to the available capacity within an electricity network to accommodate additional demand or generation without causing network issues or requiring reinforcement. Thermal headroom is defined as the difference between peak demand and the safe operating limit (firm capacity) of network components. For example, 80% headroom designates 80% of the network capacity is unused.

<sup>3</sup> Present value reflects the time value of money. That is the preference to receive rewards sooner.

## Overall Cost Categories

| Cost Area              | Elexon's estimate | ElectraLink's estimate |
|------------------------|-------------------|------------------------|
| Build costs            | £3.22m            | £3.23m                 |
| Annual Operating Costs | £0.80m            | £1.65m                 |
| Total ED3 Costs        | £7.22m            | £11.50m                |

## 5. Comparative Assessment

### Delivery Risk and Delivery Confidence

- 5.1 Given that both options are expected to deliver the same underlying functionality and scale of benefits, the timing of benefits could differ, meaning delivery confidence is an important differentiator in the value-for-money assessment. This section assesses the relative delivery risks associated with the Elexon and ElectraLink proposals.

#### Elexon:

- **Overall assessment: Higher delivery risk.** Elexon's proposal is subject to a significant critical path dependency on the delivery of FMAR. Under Elexon's proposal, CAR functionality would be delivered through a future expansion of FMAR. Whilst FMAR is focused on registering assets participating in flexibility markets, CAR would have a broader scope covering a wider range of connected assets and asset visibility functions.
- Elexon's delivery plan for CAR is structured into stages. The initial design, feasibility assessment and solution build are scheduled to run in parallel with the final testing and delivery of FMAR, with both phases expected to complete in September 2027. CAR would then proceed through testing, integration and registration before final delivery in Q3'28. These timelines assume a Spring 2027 policy decision.
- Consequently, FMAR must first be successfully delivered and operational before CAR-specific capabilities can be implemented. Delivering FMAR and some aspects of CAR in parallel creates the risk that delays, scope changes or delivery challenges within FMAR affect CAR delivery.
- This dependency is particularly relevant given FMAR's recent delivery performance. In Ofgem's 2025-26 Market Facilitator and FMAR annual performance assessment, FMAR was assessed as **Poor (2/5)**, reflecting incomplete key deliverables, weaknesses in delivery planning and continuing

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uncertainty regarding programme scope and delivery.<sup>4</sup> Consequently, the current FMAR target date of September 2027 is already considered at risk, creating a corresponding risk to Elexon's proposed CAR delivery timetable.

- Alongside FMAR, Elexon is delivering several other significant industry programmes. These include its Market Facilitator role, the Smart Data Repository and data domain coordination activities. The breadth of these activities creates additional delivery dependencies and adds further uncertainty to the proposed CAR timetable.
- Elexon's planned CAR go-live date of Q3 2028 is contingent on successful completion of FMAR, alongside system build, testing, integration and industry onboarding activities.
- In addition, less implementation-specific evidence is available to support delivery assumptions compared to ElectraLink. Elexon's proposal would have benefitted from additional detail; for example, on how aspects of DNO data integration and standardisation would be handled. This additional detail would increase our confidence on implementation effort and delivery timelines.
- Elexon benefits from established regulatory and governance arrangements. However, this advantage is partly offset by greater complexity regarding the enduring funding route for CAR. Depending on the final approach adopted, implementation may require changes across regulatory and charging frameworks, introducing additional complexity.

#### **ElectraLink:**

- **Overall assessment: Lower delivery risk.** ElectraLink's proposal has fewer critical path dependencies because it is based on enhancement of an existing operational platform rather than the delivery of a new capability, and it is not dependent on other major programmes like FMAR.
- The proposal is primarily focused on configuring and enhancing a solution currently in development (EMPRIS) with elements of transferability that can be built on, as opposed to designing and implementing a solution from scratch. While delivery remains dependent on obtaining timely and complete data from DNOs, these dependencies do not appear to represent critical path risks to the same extent as the FMAR dependency within Elexon's proposal.
- Delivery confidence is also strengthened by evidence from ElectraLink's PoC which demonstrated that DNO datasets can be combined, standardised and

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<sup>4</sup> [Ofgem, Market Facilitator and Flexibility Market Asset Registration \(FMAR\) Annual Performance Assessment Report 2025-26](#).

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enhanced, and that the required governance, access control and data-sharing arrangements can be established.

- In addition, ElectraLink has provided a detailed delivery plan with defined milestones and delivery targets. Assuming a policy decision in Spring 2027, the plan envisages delivery of an MVP focused on priority DNO use cases by Q4 2027, an initial target-state deployment by early 2028, and transition to enduring operations by Q4 2028, with ongoing testing and refinement between deployment phases. Taken together, this provides a greater degree of confidence in the achievability of the proposed delivery timetable.
- ElectraLink's proposed funding arrangements appear more straightforward to implement. However, ElectraLink is not directly regulated, meaning additional governance and assurance arrangements may be required to provide an equivalent degree of accountability and oversight. No clear governance blocker has nevertheless been identified.

5.2 The implications of these delivery risks for cost uncertainty are considered in the Cost Confidence assessment below. At face value, Elexon's proposal appears lower cost, although the robustness of that apparent cost advantage is considered further below.

### Assessment of Cost Confidence

5.3 As discussed in the Cost Assessment section, the apparent cost differential between the two proposals is highly dependent on the degree of confidence that can be placed in the underlying estimates. This section therefore considers the robustness of those estimates and the likelihood of material cost overruns.

#### Elexon:

- **Overall assessment: Lower cost confidence and greater risk of cost escalation.** There is a greater degree of uncertainty around Elexon's cost estimates due to delivery and execution risks associated with the proposal.
- As set out in the delivery risk assessment, CAR delivery is dependent on FMAR, which has recently been assessed as **Poor (2/5)** in Ofgem's 2025-26 Market Facilitator and FMAR Annual Performance Assessment.<sup>5</sup> In addition, Elexon is currently delivering a number of significant industry programmes and responsibilities, including FMAR, its Market Facilitator role, the Smart Data Repository and data domain coordination activities. Taken together, this reduces confidence that current timelines can be achieved without further coordination, organisational resource and associated costs. Should delivery timelines prove optimistic, delivery challenges could also require

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<sup>5</sup> [Ofgem, Market Facilitator and Flexibility Market Asset Registration \(FMAR\) Annual Performance Assessment Report 2025-26](#).

additional project management, assurance, testing, integration and implementation activity beyond that currently reflected in estimates. Delays may also indicate that delivery complexity has been underestimated, increasing the likelihood of further development effort and cost.

- A further source of uncertainty relates to content. Less implementation-specific evidence is available regarding delivery complexity and the extent to which additional requirements may emerge during implementation. While a PoC was not required, ElectraLink's proposal was supported by additional evidence in this area. Hence, the lack of comparable evidence increases uncertainty around delivery assumptions and the potential for changes to scope, design or delivery activity, with associated cost implications.
- In addition, Elexon's operating costs are derived using benchmark assumptions, with limited evidence provided regarding the appropriateness of those assumptions for CAR.
- **Taken together, these factors reduce confidence in the robustness of Elexon's cost estimates and increase the likelihood of material cost overruns relative to the central estimate.**

#### **ElectraLink:**

- **Overall assessment: Higher cost confidence and lower risk of cost escalation.** ElectraLink's proposal benefits from a delivery model centred on the enhancement of the EMPRIS platform reducing exposure to execution risk.
- Furthermore, evidence has been provided that some key technical challenges have been explored and partially resolved. This has been done through the PoC and reduces uncertainty regarding the scope and complexity of implementation.
- Furthermore, ElectraLink has set out a detailed delivery plan, including monthly milestones and targets, which provides additional assurance over delivery planning and implementation sequencing.
- **Taken together, costs are less likely to increase materially relative to current estimates.**

## **6. Overall Assessment, Sensitivities and Preferred Option**

### **Distributional Impacts**

- 6.1 Under the ElectraLink model, costs would be expected to be recovered by DNOs through regulated network charges, subject to relevant RIIO-ED3 funding arrangements and cost scrutiny. Under the Elexon model, CAR costs would be recovered through BSC charging arrangements, targeted specifically at DNOs through code modifications. DNOs would then be expected to recover these costs through the same regulated network charges.

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- 6.2 For the purposes of this assessment, and to drive consistency with the proposed funding arrangements, any additional costs are assumed to be fully passed through to consumers.
- 6.3 There are no risk sharing arrangements in the proposed options. While alternative risk-allocation arrangements are theoretically possible, assessing alternative funding structures is outside the scope of this assessment.

### Sensitivity Analysis

- 6.4 The Cost Confidence assessment identified materially greater uncertainty around Elexon's cost estimates than ElectraLink's. Sensitivities have therefore been applied to both proposals to test how the assessment's conclusions change under different cost escalation scenarios. Consistent with the findings of the Cost Confidence assessment, larger uplifts have been applied to Elexon to reflect the higher uncertainty around delivery risk, implementation evidence, dependence on FMAR go-live, and the underlying cost estimates.
- 6.5 In the absence of provider-specific evidence on likely cost overruns, these sensitivities are *illustrative* and not intended to predict actual outturn costs. Nor should the uplift values be interpreted as Ofgem's view of expected cost overruns or the precise magnitude of any difference in delivery risk between the proposals. Rather, they are intended to test how differences in delivery confidence and cost certainty could affect the comparative value-for-money assessment.
- 6.6 Evidence from a McKinsey and University of Oxford study<sup>6</sup> covering more than 5,400 IT projects found that large IT projects ran, on average, 45% over budget and that approximately 17% experienced budget overruns more than 200%, with extreme cases reaching around 400%. Given the digital and data-platform nature of both delivery proposals, the sensitivities below are intended as illustrative stress tests. They assess the robustness of the assessment under increasingly challenging cost escalation scenarios and are not intended to represent likely outcomes.

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<sup>6</sup> [McKinsey & Company \(2012\), \*Delivering large-scale IT projects on time, on budget, and on value\*](#). The report identifies a higher risk of cost overruns and delays in large, complex IT projects, particularly where scope expands and interdependencies increase.

**Sensitivities: Low, Central, and High**

| <b>Scenario</b> | <b>Elexon uplift</b> | <b>ElectraLink uplift</b> |
|-----------------|----------------------|---------------------------|
| Low             | +100%                | +10%                      |
| Central         | +200%                | +50%                      |
| High            | +400%                | +200%                     |

- 6.7 The low and central sensitivities reflect *potential* cost increases arising from execution issues, schedule slippage and emerging implementation requirements. Larger uplifts have been applied to Elexon to reflect the higher levels of *uncertainty* surrounding this assessment, including FMAR dependency, lower delivery confidence and lower confidence in the underlying cost estimates. The high sensitivity reflects a *severe but plausible* cost-escalation scenario associated with significant delivery challenges. The specific uplift values are *illustrative* and are intended solely to test the robustness of the assessment under a range of assumptions. These scenarios should not be interpreted as estimates of likely outturn costs or as a quantified assessment of the relative delivery risks associated with either proposal.

**Illustrative Total Costs (£m)**

| <b>Scenario</b>   | <b>Elexon</b> | <b>ElectraLink</b> |
|-------------------|---------------|--------------------|
| Provider estimate | £7.2m         | £11.5m             |
| Low               | £14.4m        | £12.7m             |
| Central           | £21.6m        | £17.2m             |
| High              | £36.1m        | £34.5m             |

- 6.8 The analysis demonstrates that Elexon's apparent cost advantage is highly sensitive to delivery performance and cost overruns. Under all sensitivity scenarios, the difference in costs between the two proposals narrows materially and, in the low, central, and high scenarios, ElectraLink becomes the lower-cost option.
- 6.9 The high-sensitivity scenarios are presented for comparison because they represent the most severe cost assumptions considered in this assessment. If

benefits exceed costs under these scenarios, they will also exceed costs under the lower-cost scenarios presented above.

### Illustrative Comparison of Benefits and Delivery Costs

| Metric                                                       | Value                        |
|--------------------------------------------------------------|------------------------------|
| Indicative benefit from a 1% increase in network utilisation | £0.6bn - £1.4bn <sup>7</sup> |
| Elexon costs (high sensitivity)                              | £36.1m                       |
| ElectraLink costs (high sensitivity)                         | £34.5m                       |

- 6.10 Previous DESNZ analysis suggests that a 1% increase in network utilisation could avoid between £0.6bn and £1.4bn of network investment by 2050. This estimate should be considered indicative and conservative, as it reflects only avoided network reinforcement expenditure associated with a relatively modest improvement in utilisation and does not capture a range of wider operational, planning and system benefits that may arise from improved asset visibility.
- 6.11 While there is uncertainty regarding the proportion of these benefits directly attributable to a CAR, the highest sensitivity delivery cost estimate represents around 5% of the estimated benefits associated with improved asset visibility. Although this is an illustrative comparison rather than a formal discounted cost-benefit assessment, it suggests that only a relatively small proportion of those benefits would need to be realised through a CAR for benefits to exceed delivery costs. This suggests that successfully introducing a CAR is likely to generate benefits that exceed delivery costs.

### Statutory Duties

- 6.12 Ofgem has several statutory duties with which it must comply when exercising its regulatory functions. We briefly highlight below how the proposed intervention aligns with these duties.
- **Principal objective.** The proposed introduction of a CAR is expected to benefit existing and future consumers by improving visibility of assets connected to the electricity system. Improved asset information should support more efficient network planning and operation, helping network operators make better use of existing capacity and avoid unnecessary reinforcement expenditure. To the extent that this reduces long-run network

<sup>7</sup> DESNZ analysis using the Distribution Network Model and based on network headroom (available capacity within electricity network to meet additional demand or generation without reinforcement). Quoted in the Call for Evidence: [Improving the visibility of distributed energy assets: call for evidence](#). Updated 12 December 2025.

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costs and supports a more efficient electricity system, the proposal is expected to deliver benefits for consumers.

- **Growth duty.** The CAR is expected to support more efficient network planning and investment by improving visibility of connected assets and network capability. Furthermore, access to clearer, centralised data on consumer and distributed energy resources could support network innovation, including through new applications of existing flexibility technologies, and the development of novel market solutions. By reducing information barriers, supporting more informed infrastructure decisions, and potentially supporting innovation, the proposal may contribute positively to productivity growth, and, hence, economic growth.
- **Net zero duty and environmental impacts.** Improved visibility of assets connected to the electricity system may support more efficient network utilisation and planning, helping facilitate the integration of low-carbon technologies and reducing the need for avoidable network reinforcement. To the extent these outcomes are realised, the proposal may generate wider environmental benefits and support the delivery of the UK's net zero objectives.
- **Public Sector Equality Duty.** Ofgem must have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between groups. The introduction of a CAR is not expected to have material impacts in relation to these matters, and no differential impacts have been identified in relation to persons sharing protected characteristics.

### Competition Impacts

- 6.13 The introduction of a CAR is not expected to have a material adverse impact on competition. The CAR would provide a common industry data capability rather than creating a source of competitive advantage for individual parties. To the extent that standardisation of asset information reduces differences in how network companies manage and access asset data, any reduction in scope for differentiation is expected to be limited and outweighed by the benefits associated with improved asset visibility and more efficient system operation. Furthermore, implementation costs are not expected to be of a magnitude that would materially affect competition.

### Approach to Impact Assessment

- 6.14 This *draft* IA been prepared using relevant IA principles and is intended to support consultation and decision making. It considers the available evidence on costs, benefits, delivery risks, uncertainty, and value for money associated with the options under consideration.

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- 6.15 This *draft* IA is not intended to provide a comprehensive assessment of the policy case for introducing a CAR. Rather, it focuses on the comparative assessment of two potential delivery approaches that emerged through the responses to the December 2025 consultation.<sup>8</sup> As both options are intended to deliver the same functionality and broadly equivalent benefits, the assessment focuses primarily on differences in costs, delivery confidence, implementation risk and value for money.
- 6.16 Stakeholder feedback will inform the development of any final IA and Ofgem's subsequent decision-making.

### **Overall Assessment**

- 6.17 Based on the assumptions adopted in this assessment, the costs associated with either delivery model appear small relative to the scale of benefits expected from improved asset visibility. The principal purpose of the assessment, however, is to compare the relative merits of the alternative delivery approaches rather than to determine the underlying policy case for a CAR.
- 6.18 At face value, Elexon's proposal appears lower cost. However, the comparative assessment identifies higher delivery risk, lower confidence in cost estimates, greater implementation uncertainty and a significant dependency on successful FMAR delivery.
- 6.19 Sensitivity analysis indicates that Elexon's apparent cost advantage is highly sensitive to delivery performance and cost overruns, such that the two proposals become broadly comparable on cost under plausible delivery scenarios. Consequently, headline cost estimates alone are not considered a reliable basis for selecting between the two proposals.
- 6.20 ElectraLink benefits from an existing operational platform, successful PoC activity, a more detailed delivery plan and greater confidence in the robustness of its cost estimates. While additional governance arrangements would be required, no clear governance blocker has been identified.
- 6.21 On balance, the evidence suggests ElectraLink provides greater confidence that CAR can be delivered to the required functionality, within the proposed timetable and at the expected cost.

### **Preferred Option: ElectraLink EMPRIIS-based CAR**

- 6.22 This reflects ElectraLink's lower delivery risk, higher cost confidence and greater confidence that CAR can be delivered to the required functionality within the proposed timetable and at the expected cost. Taking costs, delivery confidence,

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<sup>8</sup> [Ofgem \(2025\), Enhancing asset visibility: Distribution Network Operator options consultation](#)

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implementation risk and sensitivity analysis together, ElectraLink represents the stronger value-for-money proposition.

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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Q1. Ofgem intends to take account of responses to this consultation when developing its final IA. <b>Do you have any views on the analysis, assumptions, evidence or conclusions set out in this draft IA?</b> Please provide supporting evidence where possible, particularly in relation to delivery risks, implementation costs, cost confidence and the sensitivity analysis.</p> |
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