The voice of the energy industry

# Energy UK response to Enhancing asset visibility: Distribution Network Operator Options

**06/01/2026**

**Energy UK is the trade association for the energy industry, representing companies investing billions of pounds to secure our country's current and future energy needs.**

From growing start-ups to major electricity generators, grid and infrastructure developers and energy suppliers, our members are driving change across power, heat, transport and flexibility.

We provide a collective voice for the sector, working with governments, regulators, charities and other organisations to provide crucial insight that shapes policy, offers solutions and promotes best practice.

Our broad view across the whole system supports evidence-based positions which are not tied to particular technologies, and are focused on delivering strategic benefits for people, businesses and the economy.

We champion initiatives such as our Vulnerability Commitment, which pushes suppliers to go beyond regulation to support customers with additional needs, and TIDE, the industry's drive for greater inclusion and diversity. Through our Young Energy Professionals Forum, we support the development of future leaders.

We are equally committed to our team and are proud to be recognised as a 'Gold' Investors in People employer.

If you have any questions about this response or wish to engage with Energy UK and its members, we would welcome further engagement.

Kind regards,
Samuel Adekanle
samuel.adekanle@energy-uk.org.uk

## Consultation Questions

## Improving DNO Asset Registration: The case for change

### Q1. Do you agree with our case for change and that policy intervention is needed for DNO asset registration?

Yes. There needs to be authoritative alignment via a common framework to share and store data regarding the number of Low-Carbon Technologies (LCTs) and Consumer Energy Resources (CER) on the low voltage (LV) network to facilitate strategic energy planning, such as Regional Energy System Plans (RESPs) and grow the flexibility market into a more mature market.

### Q2. Do you agree with our priority use cases, and are there any other use cases we should consider?

Yes. The proposed priority use cases will allow Distribution Network Operators (DNOs) to have better visibility of the network, which would allow them to better act like and transition to DSOs via data-led decision-making, as well as make better planning decisions and avoid overbuild of the distribution network. Also, there would be increased flexibility, which means more efficient use of existing networks and a clearer indication of where and where not network reinforcements are required at both distribution and transmission levels, allowing for a more overall cost-effective network build out.

As the UK moves to a centralised planning of the energy system as a means to provide investment signals under the Spatial Strategic Energy Plan (SSEP), it makes sense for this approach to be expanded to the distribution level to ensure the entire energy industry is coordinated. A core part of this includes creating a common framework for DNO asset registration to make whole-system centralised energy planning accurate and effective.

Furthermore, increased data accessibility, quality and consistency would allow policy makers and academia to research and offer more and greater solutions to creating a desired future energy system as well as provide local authorities, especially those across multiple DNO boundaries, with better information on decarbonisation progress in their areas. This could aid in directing resources surrounding RESP, SSEP, and Local Area Energy Plans (LAEP), and allow for smoother interactions between LAEP and RESP. Increased visibility of the network will also allow for better strategic energy planning, providing investment signals for providers and consumers.

Another priority use case that should be considered is that of independent DNOs (iDNOs). iDNOs often base Asset Adoption Value (AAV) assessments on net import assumptions, which can make them risk-averse to LCTs that materially alter import and export behaviour. Without visibility of these assets, iDNOs are required to rely on conservative assumptions at the iDNO–DNO boundary, particularly in networks with high levels of on-site generation, storage, and electrified demand. Improved LCT asset visibility would enable evidence-based boundary and scenario modelling, allowing iDNOs to assess realistic power flow conditions across different seasons and operating states rather than assuming worst-case outcomes.

This, in turn, would support more proportionate AAV settings, enable conditional or managed connection offers, and allow greater levels of electrification to be accommodated safely on networks with high LCT uptake. Enabling a greater level of LCTs to connect, up to the true network limit and not the assumed one, would be beneficial to networks, consumers, and providers.

**Q3. Are there any other policy or industry initiatives that we should seek to align with?**

The goal of increased asset visibility on the DNO network should align with the Future Homes Standard as electrified homes become the standard. This will allow DNOs to anticipate Future Homes Standard-linked LCT uptake and plan for network reinforcement and management accordingly, rather than react to it. This prevents housing policy from being ahead of the electricity system, preventing electricity networks from presenting a bottleneck.

As Capacity Market (CM) reforms propose creating dedicated generating technology classes for different types of consumer-led flexibility, increased asset visibility will help aggregators provide confidence to the CM that assets are real, locatable and controllable, enabling flexibility to play more of a role in the CM.

## Defining the DNO asset registration scope and key considerations

**Q4. Do you agree with the scope proposed for assets, data, entities, and data stages, should anything else be considered?**

Yes**.** The assets in scope are relevant in today's context of flexibility and are the main sources of flexibility currently being taken up at the demand side.

It could be argued that thermal energy storage, such as hot water tanks, should be in scope, as they are part of the plans of the Future Homes Standard, and asset visibility must align with existing and related policies for maximum effectiveness.

Home thermal energy storage paired with heat pumps allows heat pump profiles to behave differently, and so should be considered for added visibility over the context of the asset. Thermal storage in homes is capacity-relevant even if indirectly, and would allow network operators not to assume worst-case scenarios for heat pumps, smoothing heat pump demand and allowing for more precise modelling of flexibility capabilities.

While recognising the need to consider the additional cost and complexity associated with dynamic data, there is a case for exploring the introduction of a limited form of dynamic information from the outset, rather than deferring all dynamic capability to a later phase.

Establishing a modest dynamic baseline early on could reduce future transition barriers, support system design choices compatible with more advanced use cases, and smooth the pathway toward fuller dynamic data utilisation over time. As an initial step, incorporating a simple operational status indicator for registered assets could

provide material benefits without introducing full real-time monitoring. This would improve confidence in the availability and reliability of assets participating in flexibility procurement at specific points in time, while remaining proportionate to the primary objectives of asset registration and planning.

The data stages, collection, storage and sharing, cover the whole journey required for effective asset visibility.

However, there is a case for prioritising the accuracy of data for larger assets, as these can materially distort network planning and operational decisions. A focus on ensuring robust, verified data for larger assets, before extending requirements to smaller installations, could provide a more proportionate and effective route to improving overall asset visibility.

**Q5. Do you agree with our enablers and dependencies, and are there any others we should consider?**

All the entities, enablers and stakeholders mentioned, DNOs, the National Energy System Operator (NESO), Elexon, installers, Original Equipment Manufacturers (OEMs), and others, are all relevant to the scope. The proposed scope in this context is already comprehensive and does not need to be expanded.

**Q6. Do you have any suggestions for collecting legacy data, or for integration of other datasets into DNO registers?**

A mix of reconciling DNO registers against existing datasets, for example, the Micro-generation Certification Scheme (MCS) Installation Database and Department for Transport (DfT) electric vehicle (EV) charging data, would be welcome. This should also include targeted use of anonymised network and smart meter data to infer likely unregistered assets. Measures should be taken to ensure the data is upgraded to new standards to improve legacy data coverage.

## Options for improving DNO asset registration

**Q7. Do you agree with the advantages and disadvantages for the proposed options, are there others or any wider aspects we should consider?**

Yes.

A comprehensive view of the advantages and disadvantages is provided in the consultation. The risk of whether each pathway allows or hinders Clean Power 2030 and the flexibility capacity target should be considered as a metric.

**Q8. Are there any changes you would make to any of the proposed options to enhance them?**

No.

**Q9. Have we missed or discounted any options that you think are suitable? In particular, for option 4 is there a preferable alternative to FMAR for expansion, and why?**

No, all suitable options have been explored.

**Q10. Which option is your preferred option, and why?**

Option 4b is preferred by Energy UK.

Option 4b builds on an existing programme of work with established governance and delivery accountability through Elexon's Market Facilitator role, and keeps DNOs embedded in Flexibility Market Asset Registration (FMAR) stakeholder engagement, improving the likelihood that the solution is designed in a way that works for both flexibility market and network planning use cases.

Integrating DNO asset registration into FMAR offers a pathway to a true 'single source of truth' for asset data across the sector, avoiding the coordination and consistency risks associated with six separate DNO registers and reducing duplication over time (while recognising DNOs may still require operational local copies).

Allowing FMAR to go live on its current timetable, while preparing it for later integration of DNO asset visibility, is a pragmatic sequencing choice. It enables quicker improvements to flexibility market participation and efficiency, and supports wider flexibility capacity objectives, including those within the Clean Power by 2030 ambition, even if full asset visibility benefits are realised later through a planned expansion.