Enhancing Asset Visibility

ENA Response to Consultation

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TABLE OF CONTENTS

Contents

Introduction

About ENA

Energy Networks Association (ENA) represents the owners and operators of licenses for the transmission and distribution of energy in the UK and Ireland. Our members control and maintain the critical national infrastructure that delivers these vital services into customers' homes and businesses.

ENA's overriding goals are to promote UK and Ireland energy networks ensuring our networks are the safest, most reliable, most efficient and sustainable in the world. We influence decision-makers on issues that are important to our members. These include:

- Regulation and the wider representation in UK, Ireland and the rest of Europe
- Cost-efficient engineering services and related businesses for the benefit of members
- Safety, health and environment across the electricity industry
- The development and deployment of smart technology
- Innovation strategy, reporting and collaboration in GB

As the voice of the energy networks sector, ENA acts as a strategic focus and channel of communication for the industry[1]. We promote interests and good standing of the industry and provide a forum of discussion among company members.

Our members and associates

Membership of Energy Networks Association is open to all owners and operators of energy networks in the UK.

- Companies which operate smaller networks or are licence holders in the islands around the UK and Ireland can be associates of ENA too. This gives them access to the expertise and knowledge available through ENA.
- Companies and organisations with an interest in the UK transmission and distribution market are now able to directly benefit from the work of ENA through associate status.

Executive Summary

ENA welcomes the opportunity to respond to Ofgem's consultation on enhancing asset visibility. Please note that this response is on-behalf of all of our electricity distribution network members only. Alongside this response, we refer you to individual electricity network company responses for their views on preferences of options and the specific questions posed through this consultation.

This response sets out ENA's position on Ofgem's consultation 'Enhancing asset visibility: Distribution Network Operator options'. Electricity networks strongly support Ofgem's objective to improve the completeness, consistency and usability of asset registration data, recognising that limitations in data availability and processing can increasingly constrain effective planning, operational assurance and the integration of distributed energy resources.

The unprecedented pace of evolution across distribution networks suggests that moving beyond individual, network-specific improvements will yield the best results for the industry. While DNOs continue to advance individually, a coordinated framework offers a proactive way to safeguard and future proof stability across license areas. By aligning early, we can avoid the complexities of disjointed systems and streamline long-term integration. Consequently, electricity networks support collaborative, strategic alignment that delivers clear, enduring value.

We propose that a new central DNO asset register delivered through ElectraLink offers the greatest confidence of a high-quality solution delivered at pace to meet Clean Power targets. A non-mutually exclusive approach to the options presented by Ofgem, in which standardisation is progressed alongside the development of a central register, is recommended to apply the merits of each option to a robust final solution.

ENA members welcome multilateral engagement across DNOs, Ofgem, and DESNZ to ensure policies and regulations from asset registration to visibility are complimentary and coordinated, and the current proposal is supported by a pragmatic funding approach.

Our Options Analysis

Option 1 – No intervention

ENA does not consider that a non-intervention approach alone would adequately address the case for change identified in the consultation. Ongoing digitalisation activity by networks will continue to improve local data quality, however, we recognise the risk of relying solely on existing initiatives leading to inconsistent outcomes and gaps, particularly for low-voltage assets and behind-the-meter technologies.

In the absence of a coordinated framework, individual networks may pursue different technical or commercial solutions to address visibility challenges. This may lead to a risk of reduced interoperability and higher long-term costs to reconcile solutions at a later stage.

We further note that Option 1 should only remain viable where a clear assessment demonstrates that the costs of intervention outweigh the benefits. At present, there is insufficient evidence that this threshold has been met.

Option 2 – Multiple standardised DNO registers

ENA members strongly believe that the standardisation of DNO registers is a necessary and unavoidable foundation for improving asset visibility. A common data standard enables interoperability, supports internal efficiency, and ensures that asset registers can be meaningfully compared and aggregated across licence areas. Historically, the inconsistent interpretation of standards by different parties has proven to be a significant barrier to achieving this alignment. Furthermore, a fragmented approach is inefficient, requiring costly, iterative cycles of comparison to reach consistency across multiple parties. Regardless of the long-term solution, networks are supportive of providing data in a consistent, standardised format.

Networks consider Option 2 alone insufficient to close visibility gaps, as it relies primarily on data held within individual licence areas and lacks mechanisms to identify assets missing from registers and receive coordinated input of additional data from third parties. This limitation is heightened where installer notifications are inconsistent or where assets have been connected historically under different regulatory frameworks. To address these legacy issues, networks advocate for a central capability that leverages broader, GB-wide datasets and proven machine learning to reconcile inconsistencies and identify unregistered low-carbon technologies.

Furthermore, current licence conditions, including limitations on the use of smart meter consumption data, further restrict the ability of networks to validate and backfill registers at scale using only local data. While Option 2 represents a minimum step forward and is required in any scenario, it does not fully address the underlying drivers of incomplete visibility.

Option 3 – Creation of a new central DNO asset register

We consider a central register, built on common data standards, the most effective route to enhancing asset visibility. This approach leverages Option 2 foundations while using GB-wide datasets to reconcile inconsistencies.

We propose that ElectraLink's EMPRIS platform should serve as the primary delivery model. As a DNO-owned joint venture, it already hosts a 26 million MPAN-level dataset. By appending DNO asset data to this existing infrastructure, the industry can reduce duplication and establish a single, trusted source for identifying invisible DER and CER assets on networks. Indeed, ElectraLink's capability effectively bridges the gap between Options 3 and 4, acting not only as a central register but also as an active data acquisition engine.

Furthermore, a centralised solution ensures consistent data validation. ElectraLink's methodology, applying machine learning to consumption data, offers a ready-made solution to identify unregistered assets and improve record confidence. Delivery through ElectraLink offers the most time efficient trajectory balanced with confidence in delivery. Accountability also remains central to this strategy. A central capability managed by an established industry body provides the transparent, auditable governance required for more advanced data management, with ElectraLink's governance structure having already been set up to support the delivery of DNO License Conditions.

To maximise effectiveness of this option, future evolution of license arrangements will be essential to unlock critical datasets, such as smart meter data, alongside regulation to support consistent registration of assets by installers.

Option 4 – Centralised data acquisition and population of asset registers

Networks recognise that Option 4 seeks to improve data completeness by centrally acquiring information from multiple sources to directly populate asset registers, rather than relying on network-provided datasets. However, this represents a complex intervention with high uncertainty regarding scope, complexity, and timelines. Centrally acquiring and processing data must be explainable, auditable, and capable of validation by the relevant licence holder.

Option 4a, expanding FMAR, is already a large-scale project where adding functionality risks the existing scope and delivery timelines. Option 4b offers a valid supporting mechanism for Option 3; by leveraging ElectraLink's established MPAN-level dataset, the industry can cross-reference and validate existing network data against consumption-based insights to improve registry accuracy. Consequently, networks consider that Option 3 delivers many of the same benefits with clearer responsibilities and lower cost, delivery time and risk.

Recommended Direction and Option

ENA supports a non-mutually exclusive pathway, in which standardised network-level registers are developed in support of a central DNO asset capability. In practice, this aligns most closely with Option 3, recognising that Option 2 is a necessary enabling step rather than an alternative.

Creating a new central DNO asset register provides the strongest assurance that asset visibility gaps can be addressed consistently, transparently and at scale, while avoiding the risk of non-standardised delivery. It also offers the greatest flexibility to evolve over time as data availability improves and system needs change.

We propose that ElectraLink is the most appropriate delivery partner for a centralised register, offering:

1) Confidence in the quality of delivery through significant expertise in the provision of energy data and existing technical solutions that can be built upon,
2) The most efficient delivery timeline that can be progressed at pace alongside FMAR, and
3) An appropriate existing model of governance for the delivery of DNO License Conditions,

A clearer understanding of costs, benefits and delivery timelines will be required as proposals are refined. A proportionate cost-benefit assessment should inform the final design and sequencing of any intervention, recognising that the benefits of coordination increase where data can be drawn from across multiple licence areas.

Additional Policy Direction Needed to Support Asset Visibility

Asset Registration

We note that some aspects of incomplete asset visibility sit outside the scope of this consultation. In particular, the absence of a consistent requirement on installers to notify asset installation means that gaps in registers will persist under any option unless addressed more holistically. Clear policy in this area is required to enhance the effectiveness of all options and to ensure that the solution built for storing and sharing asset data is fit for purpose.
ENA members welcome multilateral engagement across DNOs, Ofgem, and DESNZ to ensure policy and regulatory approaches and interventions across asset registration and visibility are complimentary and coordinated.

Funding

ENA members are committed to working constructively with Ofgem to agree a funding approach that supports delivery of the preferred option at pace. The introduction of a common, centralised approach to asset registration represents a significant change in scope; however, DNOs are keen to progress delivery earlier in order to support the achievement of 2030 clean power objectives. Establishing a clear funding route would enable coordinated industry delivery and provide the highest confidence that the preferred solution can be progressed without delay. We welcome further detailed discussions with Ofgem to identify a suitable funding approach.

Licence Conditions on Data Access

ENA members note that under Standard Licence Condition 10A, distribution network operators are limited in how they can access and use customer-level smart meter data. As the options are developed in more detail, we welcome discussions with Ofgem on how data can best be made available within these constraints to fill asset visibility gaps, or to discuss any required changes to SLC 10A and any other relevant Licence Conditions.

Conclusion

ENA is aligned in supporting Ofgem's ambition to enhance asset visibility across electricity distribution networks. While standardisation is an essential foundation, a coordinated central platform delivered through ElectraLink offers the most robust and efficient route to deliver a high-quality solution at pace, closing visibility gaps and reducing long-term delivery risk.

By progressing common standards alongside a central solution, the sector can move beyond incremental improvement and deliver a consistent, future-proof framework that supports effective planning, operational resilience and the evolving needs of the energy system. ENA members remain committed to working collaboratively with Ofgem to refine and implement this approach.

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