

**To:** Transformation to Integrate Distributed Energy (TIDE) Team, National Energy System Operator (NESO)

**From:** Energy Networks Association (ENA), on behalf of Distribution Network Operators

**Subject:** Formal Consultation Response: NESO DER/CER Visibility and Access Roadmap

**Date:** 30 April 2026

Dear NESO TIDE Team

This response is written on behalf of the Distribution Network Operators listed below. This response sets out the collective views of ENA members, each of whom may be providing their own company specific responses to the questions contained in the consultation.

If you would like to discuss any of the points raised in this submission, please contact Helen.Jarva@energynetworks.org.

Yours sincerely

Energy Networks Association

On behalf of the following Distribution Network Operators:

1. National Grid Electricity Distribution
2. Northern Powergrid
3. SP Electricity North West
4. Scottish & Southern Electricity Networks
5. SP Energy Networks
6. UK Power Networks

## Executive Summary

The Energy Networks Association (ENA) welcomes the opportunity to respond formally to NESO's consultation on the DER/CER Visibility and Access Roadmap, published in March 2026. We submit this response on behalf of our member Distribution Network Operators (DNOs).

ENA and its members are fully aligned with the strategic imperative that underpins this roadmap. Achieving proportionate visibility of and access to Distributed Energy Resources (DERs) and Consumer Energy Resources (CERs) is a prerequisite for delivering a secure, cost-efficient, and decarbonised power system by 2030. Our members are active partners in this effort and have, for several years, been investing in monitoring, data infrastructure, and Distribution System Operator (DSO) transition activities that directly support NESO's stated objectives.

However, while ENA is broadly supportive of the roadmap's direction of travel, our response raises substantive concerns regarding the distribution of implementation costs and the adequacy of technical planning detail provided to industry. Specifically, the roadmap as currently presented does not provide the granularity of information to undertake rigorous cost-benefit analyses, develop credible internal business cases, or meaningfully challenge NESO's assumptions where appropriate. These are not peripheral concerns, but challenge the deliverability and proportionality of the roadmap itself.

We urge NESO to address these issues in the finalised roadmap and in the governance arrangements established for its ongoing delivery. ENA stands ready to work constructively with NESO to develop the technical specifications and bilateral engagement processes necessary to resolve them.

## Consultation Response

### Cost Burden, Benefit Attribution, and the TIDE Programme

ENA's primary concern with the roadmap as presented relates to the structural asymmetry between where implementation costs fall and where the resulting operational benefits accrue. The activities described under NESO's TIDE programme and the broader data-sharing obligations contemplated throughout the roadmap impose considerable implementation burdens on distribution businesses, while the operational benefits (improved balancing accuracy, reduced reserve procurement costs, enhanced situational awareness) are realised primarily by NESO in its capacity as system operator.

We believe the assessment and case for change needs wider whole system considerations to address both transmission and distribution challenges. In particular, the report only quantifies NESO costs and benefits from greater visibility and access, whilst costs borne (and benefits realised) by other industry parties are not considered which gives an incomplete picture of consumer and system impact.

### Need for a Detailed Technical Implementation Plan

Whilst DNOs are broadly supportive of and recognise the need to increase visibility of assets, NESO must address real technical concerns and provide detail of the implementation without delay. ENA formally requests that NESO work with DNOs to co-develop a detailed technical implementation plan, disaggregated by programme activity and distribution network boundary, before any enduring data-sharing obligations are finalised or incorporated into regulatory settlements.

There is a risk that the top-down approach being pursued by NESO through TIDE and RNP (Reformed National Pricing) will reduce liquidity in the DSO flexibility markets and create unduly onerous requirements (technical

and/or contractual) on smaller market participants. This is in direct opposition with national ambition for more local and community energy resources.

DNOs and other stakeholders additionally need to see the detail of what is in and what is out of scope, the detail of the technical implementation, and how progress will be measured and continuous improvement/lessons learned will be implemented as the programmes of work develop.

### **Governance, Transparency, and Industry Input**

The roadmap acknowledges that its successful delivery is highly dependent on industry co-ordination. ENA endorses this framing but notes that the current governance proposal (activity-by-activity management through existing working groups and code processes) does not provide adequate visibility or ability to input for DNOs of the pipeline of obligations flowing towards them, nor a clear mechanism for escalating cross-programme dependencies.

ENA members have highlighted the concerns noted in this response to NESO previously through engagement with the TIDE programme team across 2025 and 2026 in TIDE Challenge Group sessions and DNO-specific engagement. We have not been able to gauge from the published Roadmap or consultation how NESO have considered and addressed our concerns, and request NESO to carry out additional in-depth engagement with DNOs as part of developing their implementation plan and further cost-benefit analysis.

We recommend that NESO establish an engagement process with DNOs to review roadmap progress, surface emerging cost and deliverability risks, and co-ordinate the interaction between roadmap activities and regulatory processes including ED3, FMAR, and DSI development. Annual roadmap review cycles, as proposed by NESO, are insufficient during the critical 2026–2028 Phase 1 period.

### **Two-Way Data Sharing Must Be Operationally Reciprocal**

ENA welcomes NESO's stated commitment to two-way data sharing as part of the roadmap's delivery. The Planning and Outage Data Exchange (PODE) and Operational Data Sharing (ODS) MVPs are practical demonstrations of this principle and are supported by our members. We urge NESO to formalise this commitment: where DNOs are required to share operational, asset, or network flow data with NESO, a reciprocal obligation to share relevant transmission-side data with DNOs should be established as a baseline programme requirement, not treated as an optional enhancement. Distribution businesses require transmission constraint data, outage planning information, and system-state visibility to make effective operational decisions, as the value of data exchange is fundamentally bilateral.

## **Next Steps and Call to Action**

ENA requests that NESO respond substantively to the concerns raised in this response, and commit to the following actions prior to publication of the finalised roadmap:

- Work with DNOs to co-develop a detailed, activity-level technical implementation plan for the TIDE programme and associated data-sharing obligations;
- Commission a refreshed joint cost assessment developed in collaboration with DNOs as the primary evidence base for cost-proportionality judgements;
- Formalise the principle of reciprocal two-way data sharing as a programme baseline, with specific transmission-side datasets to be identified through bilateral engagement with DNOs.

ENA is committed to constructive engagement with NESO on this agenda. The integration of distributed energy assets into system operations is a shared objective, and our members are investing significantly to enable it. We ask that the framework for collaboration reflects a fair and transparent allocation of responsibilities, costs, and accountability, and is developed in collaboration with industry.