

Submitted online to NESO

Consultation platform

16 January 2026

### **NESO RESP Draft Methodology Consultation**

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](mailto:Helen.Jarva@energynetworks.org).

Yours sincerely

Energy Networks Association

On behalf of:

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

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## Engagement

### 1. Do you agree with our approach to engagement as we develop the RESPs?

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

### 2. Please provide your reasoning?

ENA members are broadly supportive of the engagement approach for developing RESPs. In particular, we would like to call out the importance of NESO providing clear feedback to stakeholders on the inputs they have gathered, and the subsequent outcomes and actions. ENA recommend NESO to further consider taking a coordinated approach with distribution networks to customer communications to avoid stakeholder fatigue and ensure that messages are clear and aligned.

We thank NESO for their engagement to date and recognise the efforts in one-to-one relationships with DNOs as well as the RESP technical working group and ad hoc DNO workshops.

Additionally, considering the very high value and impact of this policy area, we see great value in continued multilateral strategic senior level engagement across DNOs, NESO, Ofgem, and DESNZ as relevant through the ENA-led Directors' roundtables to bring together different threads of guidance and collaboratively develop successful strategies incorporating our shared knowledge and expertise.

## Local Actor Support

### 1. Do you agree with the approach we have outlined on local actor support, and how we have phased the delivery?

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

### 2. Please provide your reasoning?

ENA members are broadly supportive of the staged approach laid out for local actor support; however, we recommend further consideration on the level of support and more in-depth reflection of DNO offerings.

We strongly support NESO's ambition to build on existing offerings such as Local Area Energy Planning guidance and tools, collaborative platforms and support networks. However, we believe that existing DNO offerings could be reflected in the methodology more explicitly to avoid duplication and ensure NESO activity complements what networks already deliver. We propose NESO should share the mapping exercise of support they have undertaken with networks so that we can offer support.

Further, we recommend facilitation of multilateral engagement between NESO, local actors, and DNOs to ensure clear messages and guidance and efficient information sharing. ENA members are ready to collaborate with NESO on achieving aligned stakeholder messaging.

Finally, we invite NESO to give additional consideration to the varying support needs of different RESP regions, as some local authorities will have extensive coverage of LAEPs and some may not. This may cause barriers for some regions to get involved with RESP.

## Governance

**1. Do you agree that local authorities should be able to decide whether to send a political representative or officer to the strategic board?**

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

**2. Please provide your reasoning?**

While ENA members take no strong stance on the inclusion of political representatives from local authorities on strategic boards, we recommend NESO to consider a clear selection criteria for political representatives, alongside a procedure that will support the avoidance of potential disruptions, such as from elections.

**3. Do you feel any changes should be made to the proposed terms of reference?**

- Yes
- Maybe
- No

**4. Please provide us the details?**

We recommend adding a clause for Board members to name alternates and delegate responsibility where they are unable to fulfil their duties due to diary clashes, illness, and annual leave.

**5. Do you agree with our proposals for appointing members of the strategic boards?**

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

**6. If you think we should change it, please provide your reasoning?**

We broadly support the process for appointing members to Boards, however, welcome more detail in this area on the selection criteria and self-nominations as well as organisational nominations.

**7. Do you agree with our proposed design for working groups?**

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

**8. If not, what changes would you propose and why?**

We broadly agree with the approach set out for working groups and NESO's move away from the multiple function working groups as set out in the Ofgem RESP policy decision.

Additional clarity is needed on some areas of the approach, including:

- Confirmation that all DNOs will be invited to join working groups, subject to clarity on expectations and agendas for different working groups;
- Whether a decision-making framework is planned for when new working groups should be established;
- Working groups' role in reviewing data sets, as this may impede their ability to perform;
- We anticipate similar topics to be discussed across working groups - NESO should clarify how messaging, priorities and objectives will be aligned to avoid contradictions and duplication of effort. It is also important that insights and outcomes from each working group are promptly shared with members to maintain transparency and alignment;
- Confirmation of timelines on when recruitment for working groups and strategic boards will commence.

We thank NESO for their engagement with networks to date and recognise the efforts in one-to-one relationships with DNOs as well as the RESP working group and ad hoc DNO workshops. While the RESP working group is a useful forum for a whole system view across electricity and gas networks, we urge NESO to include frequent additional DNO-only working group sessions in their engagement plan to allow technical and operational details of implementing RESPs to be discussed in more detail to ensure a successful and aligned implementation across DNOs.

**9. Do you agree with the proposed representation for the GB Steering Committee?**

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

**10. If not, are there other participants you feel we should consider?**

ENA Members strongly welcome the inclusion of ENA representation on the GB Steering Committee, particularly as the GB Steering Committee is responsible for the continued development of the RESP methodology, which has direct implications for networks.

We note the TOR states that the GB Steering Committee is already operating, yet we don't believe there is clear visibility of minutes or agenda items. We ask that NESO make this process more transparent.

**11. Do you agree that we should not be making major changes to the RESP methodology within cycle? If not, please can you give examples of circumstances where you think this may be necessary?**

We are supportive of no planned updates within the RESP cycle, however, recommend that an avenue for change should exist to account for unforeseen circumstances that would have a material change on RESP outputs or a material flaw is identified within the existing methodology. Based on the tRESP experience, we note that the RESP methodology may need to evolve during the first RESP cycle based on new information arising from implementation, and the process should allow for that.

## RESP Components

### Nations & Regions Contexts

**1. Do you agree with the approach for the Nations and Regions Contexts?**

- Strongly Agree
- Somewhat Agree
- Neither agree nor disagree
- Somewhat Disagree
- Strongly Disagree

## 2. Please provide your reasoning?

ENA members welcome the inclusion of local data sets, which recognise distinct regional nuances and are reflective of RESPs being place based. The effectiveness of this approach will be subject to data being assured via a transparent process. We recommend that NESO provide clarity on the methodology and criteria for data, while keeping in mind the regularly maintained up to date information already available on DNO data portals to avoid contradicting information for stakeholders.

We invite NESO to provide additional clarity on the local stakeholders that have been engaged and the impact of their contributions. This could take the format of a stakeholder engagement register which provides a consolidated overview of stakeholder groups, what insights have been gathered, from which areas, and how they have been acted on by NESO.

We welcome the role of working groups and Boards in offering an oversight and review function for the Nations and Regions Contexts.

## Pathways

### 1. Do you agree with the approach for the RESP Pathways?

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

### 2. If not, please provide your reasoning?

There remains a lack of clarity on the exact meaning and expected use of the pathway. It is important for NESO to offer this clarity and inform stakeholders to avoid misinterpretations. Additionally, it is currently unclear which aspects of FES will be used to create the RESP pathways, e.g. naming convention, assumptions, scenarios, frameworks, and how the RESP pathways will loop back together with FES, DFES, SSEP, Week 24, and other relevant forecasts, plans, industry processes and frameworks.

## Spatial Context

### 1. Our preferred approach is to move the RESP delivery dates back to enable option 2 (page 75). Do you support this approach and are there any other wider factors we should consider?

- Yes
- Maybe
- No

## 2. Do you agree with our proposed approach for the Spatial Context?

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

## 3. Please provide your reasoning?

ENA members are very supportive of option 2 over option 1, as it makes use of existing DNO capabilities, and the limitation regarding timings is no longer relevant due to RESP delays. It is important to consider the role of RESP in other reporting processes such as Week 24 as other uses of forecasts and associated headroom.

## Strategic Investment Needs

### 1. Do you agree with our description of the three types of complexity and the examples indicated?

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

### 2. What additional considerations should we take to categorise complex strategic energy needs. Please provide your reasoning.

We agree that strategic energy needs should include projects or clusters that are nationally or regionally significant, of high economic and/or system value, require network investment ahead of certain need, and that NESO should assess the level of geographical and time complexity of projects. However, we note that a certain level of certainty is required on the size, location, and timing of a project for network planning and responding to capacity needs in the right place at the right time. Therefore, we would encourage further detail in how NESO are defining and assessing geographical and time complexities in their assessment.

In identifying strategic energy needs, we urge NESO to take a collaborative approach by gathering qualitative data from stakeholders and working closely with DNOs, who should be included in advance of the energy needs being confirmed.

Aligned with the tRESP approach, we recommend that the RESP specifies Strategic Energy Needs, irrelevant of network capacity. The RESP should not specify Strategic Investment Needs based on consideration of network capacity because they could be quickly outdated due to new connection applications. All energy needs which are considered strategic should be included in the RESP so that they can then be integrated by DNOs with the latest connections information for network planning when creating business plans.

Additionally, ENA members support the clustering of energy needs as a low regret opportunity to accelerate capacity and would welcome further clarity on how clustering is expected to work between strategic energy needs and pathways.

**3. What further considerations should we take as we develop the approach for specifying and categorising Strategic Investment Needs to ensure consistent regulatory treatment of network investments? Please provide your reasoning.**

While the ownership of this area lies with Ofgem, we flag that clear definitions and worked examples are needed in Business Planning Guidance for clarity on how strategic energy needs are expected to be treated when creating a plan and arrangements for delivering associated network developments in period. Implications for price control periods should be collaboratively agreed between Ofgem, NESO and DNOs.

## Supporting Functions and Considerations

### In-Development Register

**1. What measures could help build confidence in sharing information?**

ENA recommend that NESO weave in a way for stakeholders to consent to the data they submit to be shared with their local DNO as well as NESO. This is a quick win to enable data sharing while reducing stakeholder fatigue.

We further invite NESO to provide additional detail on the circumstances for projects moving from the in-development register to RESP pathways or the connections queue, and how this relates to DESNZ's Connections Accelerator Service.

### Network Planning Assurance

**1. Do you support the selection of option 2 (page 156) as delivering best value in assuring alignment?**

- Yes
- Neutral
- No

**2. If not, please provide your reasoning.**

ENA members support a moderate approach to assurance, however, the comparison of DNO peak forecasts to NESO's indicative forecasts should not be a part of the assurance process as it would not yield meaningful results. We believe that NESO should design the Network Planning Assurance process focused on where it adds the most value to consumers, therefore, we strongly recommend a more pragmatic approach where DNOs continue to produce their peak forecasts and NESO provide assurance by auditing and testing the DNO's approach and checking their calculations.

It also remains unclear how DNOs are expected to evidence application of strategic energy and/or investment needs, creating a risk of multiple interpretations. This should be mitigated by a clearly documented methodology.

Timelines should be clarified for the application of the assurance approach, and how it will work for ED3 business plans that take both tRESP and enduring RESP into account for their network planning.

## Digital and Data Approach

### 1. Do you have any observations or suggestions on our proposed approach to managing RESP data?

We welcome NESO's recognition of the need to share stakeholder data with distribution networks and recommend that a consent form be provided to stakeholders at the time of data collection.

### 2. How frequently do you believe data refreshes should occur to ensure the RESP remains accurate and useful? What criteria should trigger a data refresh? Please provide your reasoning.

NESO should consider the risk of ED4 business plans being based on 2028 RESPs as the next RESP won't be available early enough to support business planning, and subsequent equivalent impacts of the cycle. The potential for extraordinary updates due to significant policy changes and disruptive events, such as political unrest or global health crises should also be considered.

## Timelines and Next Steps

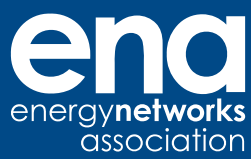
### 1. Overall, do you agree with the approaches proposed across the RESP methodology? Are there any elements of the methodology that you would like to see in more detail?

Following delays to the SSEP and RESP, we request NESO to set out revised timelines considering interactions with DNO business planning processes and price control periods.

For example, if NESO maintain a 3-year cycle starting in Dec 2028, then the next RESP would be published in Dec 2031, at the same time when ED4 business plans are submitted.

Additional clarity in the methodology should be provided on what constitutes a RESP cycle, its cadence, and the trigger for when a new cycle begins.

ENA members welcome continued engagement with NESO to discuss areas of the RESP methodology and implementation not included in the consultation in more detail.



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