



Independent Networks
Association

To:
Ofgem Forward Work Programme Team

Email: FWP@ofgem.gov.uk

10 February 2025

Ofgem Forward Work Programme – 2025/26

Thank you for the opportunity to comment on this consultation. I am writing on behalf of the Independent Networks Association (INA) who represent Independent Distribution Network Operator (IDNO) licence holders and Independent Gas Transporter licence holders (IGTs) that operate across Great Britain providing networks for customers in new housing developments, commercial and public sector facilities, EV charging, generation and storage facilities. Independent networks compete against themselves and incumbents to provide networks for their customers. The use of competitive networks has grown significantly in popularity as, in order to win the business, they provide a tailored service to developers, working with them to provide agile solutions to enable them to progress their projects and enable growth that supports net zero goals in a timely fashion, at a time when we require a more dynamic and innovative approach to network provision.

Strategic Priority 1: Shaping a retail market that works for consumers

The INA supports the focus in this area. As we commented on the Debt Relief Scheme consultation, we support a review of the retail market to ensure the Debt Relief Scheme is a one-off policy and steps are taken to understand the causes and solutions to debt.

We would like to understand how Ofgem intends to take forward the proposal to have a 'tell us once' priority services register across energy, water and telecoms. Ofgem worked with Ofwat and the Information Commissioner to support the sharing of priority services registers between DNOs and incumbent water companies. This did not include the independent sector and as they have around 4 million customers, this represents a gap in the ensuring priority customers are best identified and supported. The lack of a 'tell us once' scheme also places the onus on priority and vulnerable customers to tell multiple utility providers each year. There are clearly benefits to customers from progressing this policy and we would like to see this as a clear priority for Ofgem.



Independent Networks
Association

Strategic Priority 2: Enabling infrastructure for net zero at pace

We agree with the priorities set out.

Strategic Priority 3: Establishing an efficient, fair and flexible market

We support the focus on REMA, which will unlock the ability for Distribution Use of System (DUoS) charges to be reviewed. DUoS charges have been paused for some years and were out of date even when the Significant Code Review was started. This should be prioritised in the work plan.

We welcome the licencing and regulation of aggregators to enable these services to flourish. Independent networks connect 80% of new homes to the electricity network. These increasingly have EV charging capability and will be fitted with low carbon technologies and, potentially, solar under the Future Homes Standard. New housing developments will therefore be early flexible hubs, able to contribute to local energy markets. In the interests of future customers, the ability and trust from appropriate regulation of aggregation services will enable customers to benefit from providing flexibility and support the affordability of the net zero transition.

Nicola Pitts
Executive Director