

Alex Walmsley
Senior Manager
DSO and Whole Systems
Office of Gas and Electricity Markets,

06/01/2020

Dear Alex,

Key enablers for DSO programme of work and the Long Term Development Statement

Forbury Assets Limited welcomes the opportunity to comment on this consultation on key enablers for DSO programme of work and the Long Term Development Statement (LTDS). As a prospective IDNO, we are supportive of IDNOs having a requirement to produce a LTDS, with content and format to be as consistent as possible with that produced by the DNOs. This will ensure uniformity and accessibility of the data. To ensure that this requirement does not become a barrier to market entry we suggest Ofgem considers a threshold level at which IDNOs become obliged to provide this information. This would safeguard against small and new IDNOs incurring disproportionate costs (in terms of hardware, software and resource).

One of the key factors for IDNOs would be the condition/utilisation/demand on the upstream DNO network. It would be beneficial for DNO-specific data to be shared in a consistent manner with IDNOs to support IDNO statements. A standard set or range of assumptions could be produced to feed into this, rather than IDNOs having to make forecasts of connections or load growth. IDNOs face potentially greater challenges than DNOs in terms of diversity of network areas and types, therefore region-by-region input would be beneficial.

We are supportive of the aims of this consultation as leading towards decarbonisation and the democratisation of energy. Our view is that the LTDS and the processes to produce it should be standardised, and that the data is widely accessible, both in format and content.

We look forward to receiving Ofgem's decision notice in due course.

Yours sincerely

Louise Murphy
Business Partner for Regulation