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Dear David,

RECCo response to: Enhancing asset visibility for Distribution Network Operator Options

We welcome the opportunity to respond to Ofgem's consultation on enhancing asset visibility for Distribution Network Operators. Our non-confidential response represents the views of the Retail Energy Code Company Ltd (RECCo) and is based on our role as managing the Retail Energy Code (REC) which governs the Retail Energy Market.

RECCo is a not-for-profit, corporate vehicle ensuring the proper, effective, and efficient implementation and ongoing management of the REC arrangements. We seek to promote trust, innovation and competition, whilst maintaining focus on positive consumer outcomes. Through the REC, the services we manage, and the programmes we run, we are dedicated to building a more effective and efficient energy market for the future.

We strongly support Ofgem's underlying objective in this consultation. Improving the visibility of small-scale distributed energy assets is increasingly important to enable efficient network planning, support the growth of flexibility, and facilitate the wider transition to a decarbonised energy system. We agree that current levels of asset visibility at low voltage are insufficient, and that there is a clear case for intervention to improve the consistency and completeness of asset registration arrangements.

At the same time, we consider it important that any future approach builds as far as possible on existing market-wide infrastructure and established governance arrangements, in order to minimise duplication, reduce delivery risk, and ensure that the sector develops a coherent "single source of truth" for core asset registration information.

In particular, we would welcome Ofgem's consideration of whether the REC Enquiry Services could play a useful and important role as part of the solution. The Electricity Enquiry Service (EES) already provides a trusted and widely used source of MPAN-linked information across the market, and all Distribution Network Operators are already parties to the REC. Similarly, the Gas Enquiry Service (GES) holds all MPRN data which could be used to hold additional data for future cases, potentially related to heat – which may be particularly important as we begin to see a reduction in gas heating. Knowing where assets exist may contribute to the better management of the system. In our view, extending this existing service to incorporate additional asset registration fields could represent a practical and efficient route to improving visibility, with appropriate onward interoperability with other platforms, including FMAR where relevant. We are working with Elexon in respect of the FMAR interactions with the Consumer Consent Solution and MHHS and these mechanisms will be crucial to meeting the government's net zero targets. Ensuring these are not siloed developments and realising both dependencies and re-use will strengthen the overall outcome of this policy initiative.

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We would also welcome clarification of the statement at paragraph 4.41 of the consultation document that "*DCC, Gemserv and RECCO were considered and discounted…*" on the basis that our remit is retail/metering-focused and that we have "*more limited experience in data storage and sharing*". This latter point does not accurately reflect RECCo's current role in governing and operating enduring, market-wide enquiry services (as described above), which provide core datasets relating to nearly 60 million Registered Meter Points, underpinning switching and wider market processes and are delivered through established governance, assurance and secure-access arrangements at scale.

We therefore consider that RECCo's capability in operating and assuring large-scale data services warrants explicit re-examination within the option appraisal, particularly for any approach that needs an authoritative, premise-/supply-linked anchor dataset and secure interoperability with other DSI-aligned platforms (including FMAR). More broadly, and consistent with our position on architectural coordination[1], we consider strong coordination and reuse across intersecting programmes to be essential to avoid duplicated solutions, inconsistent standards and higher costs for consumers. We set out below our responses to the consultation questions. Our answers reflect our support for Ofgem's objectives while offering some additional considerations from the perspective of RECCo's role in market-wide data services.

We are happy to discuss any of the points raised in this response.

Yours sincerely,

Jon Dixon
Director, Strategy and Development

[1] "RECCo response to open letter: Energy Digitalisation Governance – Architectural Coordination", 5 December 2025.

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Appendix: RECCo response to consultation questions

Q1. Do you agree with our case for change and that policy intervention is needed for DNO asset registration?
Yes. We agree with Ofgem's assessment that there is a strong case for change and that intervention is now needed to improve asset visibility. The pace of deployment of consumer energy resources (including EV charge points, heat pumps, domestic solar PV and battery storage) means that current registration levels are not sufficient to support efficient network planning or whole-system coordination. We also recognise that the challenge is not solely one of data collection, but of ensuring that asset information is captured consistently, updated appropriately over time, and made accessible in ways that support both operational and strategic use cases. In our view, intervention should therefore focus not only on creating new requirements, but also on ensuring the sector converges on a coherent and trusted "single source of truth" for defined core registration data elements (rather than proliferating overlapping registers that require continual reconciliation). We note that FMAR is being designed to act as the single source of truth for assets participating in flexibility markets, aligned with DSI approaches, with mechanisms to incorporate updates over time. For the broader asset visibility landscape (which extends beyond flexibility markets), we see value in anchoring core, household-/supply-linked registration data to established premise identifiers. In particular, linking asset records to MPANs is likely to be the most effective way to ensure consistency, and the REC Enquiry Service already holds the authoritative MPAN universe, providing a natural foundation for premise linkage and reducing the need for new premise-matching logic to be created repeatedly across systems. This can then support onward interoperability, via standardised interfaces and secure sharing patterns consistent with DSI, into FMAR and other authorised destinations where required. We also consider there is a practical implementation advantage in building on established retail-market assurance and installation-stage touchpoints. RECCo's Forward Work Plan highlights how market issues can originate from details captured at the point of installation (e.g. address or technical details), supporting the case for capturing core data at source rather than relying on retrospective population rules and reconciliation. In parallel, Ofgem's Preliminary SDS highlights reforms to the Safe Isolation Provider (SIP) role to make accreditation easier (with appropriate engineering oversight), and RECCo is developing REC changes to decouple SIP accreditation from MEM accreditation while maintaining robust technical, safety and assurance standards. Taken together with the REC's established assurance and governance arrangements, this places retail-market infrastructure in a strong position to support reliable data capture and "in-life" updates through real operational processes, rather than creating complex data population rules to infer asset location and status after the event. Finally, consistent with our wider position on digitalisation, we consider strong cross-programme coordination to be essential so that CCS/consent patterns, DSI interoperability, FMAR market onboarding and retail-market infrastructure evolve in a joined-up way. Without coordination there is a real risk of duplicated solutions, inconsistent standards and higher costs for consumers; the priority should be reuse and interoperability rather than parallel "solutions of record" emerging in different parts of the sector.

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Q2. Do you agree with our priority use cases, and are there any other use cases we should consider?

We broadly agree with Ofgem's priority use cases, particularly those linked to distribution network planning, operational decision-making, and enabling flexibility services.

We would also encourage Ofgem to consider the wider value that improved asset visibility could provide across the energy system. For example, enhanced information on electrification assets could support housing associations and retrofit programme delivery, help inform longer-term analysis of changes in gas demand, and provide useful insight into significant changes in premise-level consumption that may indicate asset installation or infrastructure impacts. The EES can already be accessed by third parties, such as housing associations and local authorities who will play a critical role in the installation and management of distributed assets. The REC governance arrangements ensure information is shared appropriately with strong safeguards.

These broader considerations reinforce the importance of ensuring that the asset visibility framework is designed to support multiple system needs, not solely flexibility market participation.

Q3. Are there any other policy or industry initiatives that we should seek to align with?

Yes. We encourage Ofgem to align with, and avoid inadvertently duplicating, key industry initiatives and data services that are already established or in active development for closely related purposes. In particular, we draw attention to the following:

- **REC services and data flows** – These operate on a GB-wide basis and are routinely used by energy suppliers, DNOs, Gas Distribution Networks and a range of third parties, including local authorities. REC-governed services support consistent data access and exchange across the retail market and are underpinned by established governance arrangements. Performance assurance mechanisms play a central role in maintaining data quality and compliance with market obligations, providing confidence that data is both accurate and appropriately managed.
- **REC Enquiry Service** – This provides a well-established operational service through which authorised market participants access MPAN-linked information. It is widely relied upon as a trusted reference point for premise-level data and already supports market-critical processes. All DNOs are existing REC parties and therefore already have the necessary contractual and governance relationships in place to engage with the service, reducing the need for new onboarding or parallel access arrangements.
- **Consumer Consent Service (CCS) and Data Sharing Infrastructure (DSI)** developments for consent/access approaches (to ensure interoperability and consistent governance).
- **Programmes and standards** that will shape retrofit delivery and installer assurance, including the emerging role of SIPs and associated standards activity, which RECCo expects to contribute to.
- **Broader compliance and certification routes**, e.g. National Inspection Council for Electrical Installation Contracting (NICEIC) or National Association of Professional Inspectors and Testers (NAPIT) that generate structured installation evidence Electrical Installation Certificate/Electrical Installation Condition Report (EIC/EICR), should be treated as potential sources for cross-validation and/or data enrichment rather than excluded from the ecosystem.

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Q4. Do you agree with the scope proposed for assets, data, entities, and data stages, should anything else be considered?

We broadly agree with the proposed scope, including the focus on improving visibility of small-scale consumer and distributed energy resources, where the current registration gap is most acute.

We particularly support the emphasis on ensuring that the framework captures assets such as EV charge points, heat pumps, domestic solar PV and battery storage, as these technologies are being deployed at scale and have material implications for low-voltage network planning and the delivery of flexibility. These assets are also those most likely to involve direct and ongoing interactions between consumers and energy suppliers, who may be involved not only in the initial provision of the asset but also in its financing, operation, optimisation and ongoing management.

Given this close and continuing relationship between consumers and suppliers, it is important that the asset visibility framework recognises the role of consumer-facing market participants and the systems through which those interactions are governed. Where assets are closely linked to supplier-led propositions and consumer engagement, there is a strong rationale for registration to be supported through REC-governed arrangements, ensuring consistency with existing retail market processes and providing a clear and trusted route for managing asset-related data alongside other consumer-linked information.

In addition, we encourage Ofgem to consider the following points as part of scope design:

- **Anchoring registration data to premise-level identifiers**: consumer energy assets ultimately relate to premises and connections that are already uniquely identified through MPANs. Linking asset registration data to MPANs from the outset will improve data quality, reduce duplication, and enable more effective validation across datasets.
- **A proportionate and extensible data model**: the initial registration dataset should focus on core “must-have” fields required for visibility (asset type, capacity, location/premise identifier, installation date). Over time, the framework should be capable of incorporating additional attributes where justified, such as certification references or operational characteristics.
- **Lifecycle stages beyond initial installation**: asset visibility is not a one-off requirement. The framework should support updates over time, including replacement, decommissioning, or material modification. It is important that the governance model identifies which actors are best placed to provide those updates (installers, data collectors, retrofit providers, etc.).

Overall, we agree with the scope proposed, but believe that premise-linked identifiers and lifecycle updating arrangements will be critical to ensuring the framework is robust in practice.

Q5. Do you agree with our enablers and dependencies, and are there any others we should consider?

We agree with Ofgem’s identified enablers and dependencies, particularly those relating to interoperability, governance, and the practical need to minimise burden on installers and other market participants. We would also highlight the importance of building on established market-wide services that already deliver these enablers in practice.

The REC EES is a mature, GB-wide operational service that already enables secure, standardised access to MPAN-linked information for authorised parties and is used routinely to support critical

market processes. The service operates within a well-established governance framework, with performance assurance arrangements that actively monitor compliance, data quality and service delivery. These features provide a high degree of confidence that obligations can be met consistently and at scale.

In our view, services such as the EES demonstrate how interoperability, strong governance and effective assurance can be delivered together, and should therefore be considered as key enablers in their own right when assessing dependencies and implementation pathways for enhanced asset visibility.

We would also highlight several additional enabling factors that may be important for successful delivery:

- **Established governance and participation**: a key dependency is whether the chosen approach sits within an industry framework where all relevant parties are already engaged. Solutions are more likely to succeed where governance, assurance, and access arrangements are mature and familiar.
- **The role of existing market-wide services**: asset visibility will require consistent data exchange across multiple actors. Leveraging services that already operate at scale across the sector may accelerate implementation and reduce delivery risk. In this context, the REC Enquiry Service already provides a trusted, operational data access service used widely across the market.
- **Broadening the range of data contributors**: asset data sources should not be limited to a narrow set of registries. Meter installers, data collectors, SIPs, and approved installer schemes (e.g. NICEIC/NAPIT) will increasingly play a role in gathering and evidencing asset information. Recognising these contributors can improve completeness and reduce reliance on a single reporting route.

In our view, governance maturity, trusted existing infrastructure, and inclusive data contribution pathways are critical dependencies for achieving Ofgem's objectives. The REC provides one such framework, and its enquiry services already operate at scale across the market.

Q6. Do you have any suggestions for collecting legacy data, or for integration of other datasets into DNO registers?

Yes. We agree that addressing legacy assets — those already installed but not registered — will be essential to achieving meaningful improvements in visibility.

We suggest that legacy uplift is likely to require a combination of approaches:

1. **Cross-referencing existing datasets**
   DNOs and industry could enhance register completeness through structured reconciliation against credible sources, such as:
   - MCS installation records (where applicable)
   - Installer certification evidence, including Electrical Installation Certificates and Condition Reports (EIC/EICR)
   - EPC-linked retrofit datasets where appropriate

While none of these sources are complete in isolation, together they can support validation and gap identification.

2. **Using established premise-level identifiers**
   Linking asset information to MPANs is likely to be the most effective way of ensuring consistency. The REC Enquiry Service already holds the authoritative MPAN universe and therefore provides a natural reference point for premise linkage.

3. **Embedding updates into operational touchpoints**
   Legacy visibility can also be improved through "in-life" updates, such as at maintenance visits, meter exchanges, retrofit works, or asset replacement events. Enabling trusted actors (installers, data collectors, SIPs) to submit updates through streamlined channels will improve accuracy over time.

We consider that a legacy uplift strategy anchored in MPAN linkage and supported by multiple contributor routes will be most effective. The REC Enquiry Service already holds the complete MPAN universe and therefore provides a natural foundation for linking asset records consistently to premises. Extending such a service to hold additional registration fields could help avoid the need for new premise-matching logic to be developed separately across multiple systems.

Q7. Do you agree with the advantages and disadvantages for the proposed options, are there others or any wider aspects we should consider?

We broadly agree with Ofgem's assessment of the advantages and disadvantages across the proposed options, particularly around the trade-offs between standardisation, deliverability, governance complexity and interoperability.

We would also encourage Ofgem to consider several wider aspects:

- **Avoiding multiple competing "sources of truth"**
  One of the key risks is that parallel registers emerge across different programmes, requiring ongoing reconciliation. Asset visibility will only deliver its intended value if the sector converges around a trusted core dataset.

- **Ensuring neutrality across use cases**
  Ofgem's objective is broader than flexibility market participation alone. Asset visibility is fundamentally a network planning and operational requirement. Register arrangements should therefore remain neutral and capable of serving multiple authorised stakeholders, not optimised solely for market onboarding.

- **Building on existing participation structures**
  Options that leverage existing industry frameworks where DNOs already participate may be more deliverable than those requiring entirely new engagement models.

Overall, we agree with Ofgem's framing, but emphasise the importance of avoiding fragmentation and ensuring the chosen approach supports system-wide needs.

Q8. Are there any changes you would make to any of the proposed options to enhance them?

Yes. We suggest that all options could be strengthened by explicitly recognising the potential role of existing enquiry infrastructure and market-wide services.

For example, one approach could involve holding core asset registration fields in an established MPAN-linked service, with appropriate interoperability to DNO systems and onward feeds to other destinations, including FMAR where relevant.

This could help reduce duplication, accelerate delivery, and ensure that the core "single source of truth" sits within an existing governance framework.

Q9. Have we missed or discounted any options that you think are suitable? In particular, for option 4 is there a preferable alternative to FMAR for expansion, and why?

We recognise the important objectives of the Flexibility Market Asset Registration (FMAR) programme, particularly its role in enabling assets to participate efficiently in flexibility markets and reducing duplication for market entry.

In our view, FMAR is fundamentally designed to support the operation and growth of flexibility markets; expanding its scope to act as the primary register for all Consumer Energy Resources (consumer assets) risks blurring this focus and potentially distracting from its core flexibility objectives.

We therefore encourage Ofgem to consider whether FMAR is best positioned as one component within a wider asset visibility landscape, rather than the sole destination for all asset registration data—recognising that the consultation scope is broader than flexibility markets alone, and is closely linked to households, supply arrangements and premise-level identifiers.

In this context, we suggest that REC governed Electricity Enquiry Services (formerly known as ECOES) could provide a complementary and efficient foundation for holding core, premise-/supply-linked asset registration information (including for assets that are not participating in flexibility markets), because:

- the service already holds the authoritative set of MPANs to which consumer energy assets are intrinsically linked;
- all DNOs are already parties to the REC – including specific contribution to EES funding - with established governance and access arrangements;
- and extending an existing, trusted service would reduce delivery risk and avoid creating a new register—and associated premise-matching logic—from first principles.

This approach would also support Ofgem's stated concern about avoiding parallel "sources of truth" and ongoing reconciliation overheads by anchoring a trusted core dataset in an established governance framework, while providing onward interoperability (e.g., via APIs/standardised feeds) to FMAR and other platforms where flexibility market participation or other authorised use cases require it—allowing FMAR to remain focused on flexibility market enablement.

Finally, consistent with our wider position on sector digitalisation, we think the greatest value will be unlocked through strong coordination and reuse across intersecting programmes (including CCS, DSI and FMAR) to avoid duplicated solutions, inconsistent standards and siloed developments; a light-touch, federated approach to interoperability, shared standards and dependency management would strengthen end-to-end outcomes for consumers and the system.

We therefore see value in Ofgem considering REC Enquiry Services as part of the option set, allowing FMAR to remain focused on enabling flexibility markets (and acting as the single source of truth for flexibility market participation), while core household- and supply-linked asset registration data is anchored through established retail market infrastructure and made interoperable with FMAR and wider DSI-aligned services.

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Q10. Which option is your preferred option, and why?
Our preference is for an approach that delivers Ofgem's objectives while minimising duplication, delivery risk and long-term reconciliation overheads. For clarity, we see this as most closely aligned to Ofgem's 'expansion of an existing or emerging industry platform' approach (Option 4), but with a defined scope: anchoring core premise-/supply-linked registration data in established retail-market infrastructure with secure onward interoperability to FMAR and other authorised services, rather than creating a wholly new standalone register. We see particular merit in models where DNOs retain operational responsibility for how asset information is used, but where core registration data is anchored in an established, governed service that already supports consistent premise linkage and interoperable data exchange. In this context, the REC Enquiry Service represents a credible and deliverable foundation for holding core asset registration fields. The service already operates as part of the retail market architecture and interfaces successfully with other central systems, including the Data Integration Platform (DIP) and the Central Switching Service (CSS), through established and proven data flows. This demonstrates that the Enquiry Service can support secure, reliable and scalable interoperability across market-wide platforms in practice, rather than in theory. Building on this existing capability would allow asset registration information to be integrated into the market using well-understood governance, assurance and change processes, reducing delivery risk and avoiding the need to recreate core infrastructure. Relevant data could then be shared onward, via APIs or standardised feeds, to other systems where needed, including FMAR. This approach would allow FMAR to remain focused on its primary role of facilitating participation in flexibility markets, rather than acting as a comprehensive register of all consumer energy assets. By separating core registration from market-specific enablement, Ofgem can support a clearer, more coherent and future-proof asset visibility framework that leverages existing market-wide infrastructure effectively.