

Long duration electricity storage window 1: minded-to decisions

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Electricity Storage Network

The **Electricity Storage Network (ESN)** is the industry group and voice for grid-scale electricity storage in GB. The ESN has 100 members who have a mission to promote the use of energy storage and flexibility to support the net-zero transition. The ESN membership includes clean energy developers, owners, investors, optimisers, and academic institutions. This includes representation from publicly listed specialist funds focusing on storage and independent developers that have raised several billion pounds to invest in this new technology.

This response is based on input from our members involved in developing grid-scale electricity storage projects in GB, as well as feedback received via our Markets and Revenues working group.

About Regen

Regen manages the ESN. Regen provides independent, evidence-led insight and advice supporting our mission to transform the UK's energy system for a net zero future. We focus on analysing the systemic challenges of decarbonising power, heat and transport. We know that a transformation of this scale will require engaging the whole of society in a just transition.

Regen is also a membership organisation, managing the Regen members' network and the Electricity Storage Network (ESN). We have over 200 members who share our mission, including clean energy developers, businesses, local authorities, community energy groups, academic institutions, and research organisations.

Continuing engagement

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Summary and general views

The Electricity Storage Network (ESN) welcomes the opportunity to respond to this consultation. The Electricity Storage Network has been engaging extensively around the development of Long Duration Electricity Storage (LDES) policy support, including via our Innovation and Technology working group. The points made in those meetings, member surveys and workshops – as well as feedback from bilateral conversations with members – have fed into our consultation response.

While we recognise the benefits of deploying long duration energy storage at scale, we are increasingly concerned that this and several other significant market reforms are being developed in isolation, despite their combined impact on storage projects. Taken together, reforms to national pricing, locational procurement of response and reserve services, network charging, CMP470, BSC P462 and repetitive re-trading solutions could fundamentally reshape the commercial and operational environment for storage. Window one LDES projects, many of which are in northern Scotland (67% of power capacity), will be particularly impacted by network charging reform, BSC P462 and changes to the treatment of repetitive re-trading.

Without a coordinated approach, there is a real risk that individual reforms create conflicting investment signals, increase complexity and lead to unintended consequences that undermine confidence at a time when rapid deployment of storage is essential to meet Clean Power 2030 targets. Recent research by LCP Delta suggests GB is not on track to meet its deployment targets for battery storage by 3 GW¹.

ESN therefore believes there is an urgent need for a holistic review of the policy and market framework for storage projects. This should assess how these reforms interact, establish a clear direction for implementation and provide investors with greater certainty over the future market landscape.

Recommendation: DESNZ, Ofgem and NESO should undertake a holistic review of the policy and market framework for storage, assessing how national pricing, locational procurement, network charging, CMP470, BSC P462 and repetitive re-trading reforms interact with one another, to establish a clear direction for implementation.

Alongside this, ESN members have also highlighted the importance of providing clarity on the operational and licence conditions applicable to LDES assets. While we note the ongoing consultation on special licence conditions, greater transparency is needed on how LDES projects will be expected to operate. This clarity should be provided as soon as possible to support both projects that have secured LDES contracts and shorter-duration storage assets

¹ LCP Delta, 2026 [The GB Power Market Outlook 2026](#)

currently in operation or development. Providing certainty on the regulatory framework is critical to maintaining investor confidence and ensuring continued deployment of energy storage technologies across all durations.

Recommendation: Ofgem and DESNZ should provide urgent clarity on the operational and licence conditions for LDES assets.

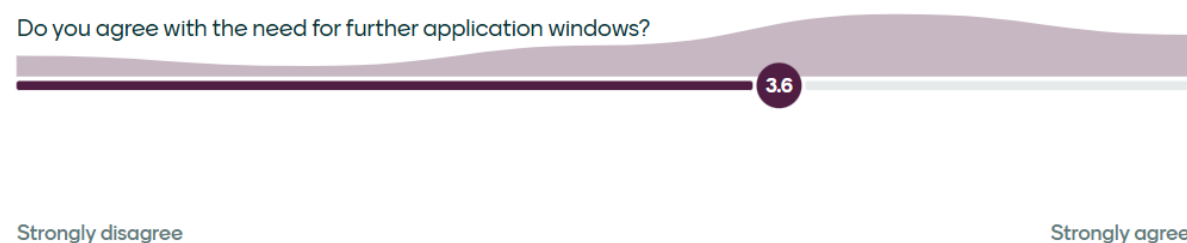
Responses to consultation questions

Our response to specific questions in the consultation focuses on Question 4 concerning the need for further LDES cap and floor windows. This is due to a range of views from ESN members regarding the other three questions. Engagement with ESN members has indicated that a clear majority support the need for further application windows.

Question 4: Do you agree with opening further applications windows?

During a recent member working group on LDES we polled members present on the need for further application windows. There was clear majority support for further LDES cap and floor application windows (as shown in Figure 1). Our members would welcome clarity on the plans for further windows beyond what is already published, as no firm commitment on timing has been given, though we appreciate that the number of projects awarded cap and floor contracts will be a factor.

Figure 1. ESN member poll results on the need for further application windows



A further LDES cap and floor window in 2028 may make sense, which would allow time to evaluate the attrition of window one projects. Future windows should be informed by lessons learned from window one, attrition levels and the NESO Strategic Spatial Energy Plan (SSEP). If the delivery of alternative low-carbon flexible capacity technologies, such as CCUS or hydrogen for power generation, falls short of the targets identified in the SSEP, it may be appropriate to procure LDES above the SSEP capacity target in future windows.

Recommendation: Ofgem and DESNZ should confirm a further LDES cap and floor window and the scale of LDES capacity that may be required.

Recommendation: Ofgem and DESNZ should clarify the timings and design of the next window of LDES cap and floor procurement as soon as possible.