

Ofgem Call for Evidence on RIIO-T3 Business Plans - Submission

- A Organisation is **Suffolk Energy Action Solutions (SEAS hereafter)**;
- B National Grid Electricity Transmission's RIIO-T3 Business Plan (*NGET BP hereafter*)
- C Nothing in this response is confidential

Our key areas of concern in submitting this evidence are within the following areas:

- 1 NGET failure to put community stakeholder views 'at the heart' of the process of Business Planning, and failure to deal adequately (or in some cases, at all) with consultative response;
- 2 NGET failure to engage with 'host' communities before '*option selection*' has become '*choice of option*';
- 3 The resulting overall accountability and transparency of the business process;
- 4 Environmental Impacts.

We will set out our concerns in these areas by reference to –

- Ofgem's mandatory requirements for the preparation of Business Plans;
- NGET's failures to reflect these requirements in their BP document, and
- the failure of NGET to comply with *either* the Ofgem requirements *or* their own BP processes, with specific reference to the Sealink statutory consultative process and the DCO processes for EA1N and EA2.

Introductory

In the Call For Evidence, Ofgem states clearly (para 5) that ‘...We expect companies’ BPs to reflect stakeholder views and ensure they are at the heart of their plans.’ This requirement is fundamental to the balance between the best interest of current and future consumers and the statutory requirements of net zero and carbon budgets. The Business Plan must clearly set out how this balance is to be achieved, and there must also be clear processes in the BP for ensuring transparency and stakeholder engagement.

An enhanced engagement framework (2.1) is central to these requirements, and should facilitate challenges to the Business Plan and to its implementation and delivery where there has been a failure to meet these requirements. We feel strongly that a challenge through the Independent Stakeholder Group is justified on the basis of NGET’s failure to comply with Ofgem guidance (4.38) that potentially impacted communities must be engaged. In section 1.5 of their Business Plan, NGET claim a comprehensive process of engagement and opinion-gathering has been part of its preparation:

Since 2022, we have listened to the views of 10,000 consumers, including households, small businesses and large industry, triangulating with available papers, publications and research. Through bilaterals, focus groups, workshops, summits, webinars and regional forums, we have gathered insights from more than 2,000 stakeholders. We have supplemented this with market research. As part of the Great Grid Upgrade, we have met with more than 23,300 community members in the areas where we are already expanding our network.

Our evidence, however, shows that however many times an opinion contrary to their already formed options is given, it is very much the exception rather than the rule that these responses are fully responded to, understood in context, and received as part of the development of the Plan. We show case studies below of this process in action, with simple refusal to listen a common factor over a range of DCO and consultation processes dating back over the last decade and more.,

There is no reason to suppose that under the pressure of Clean Power 30 and the huge development acceleration required by the Government and promoted and funded through Ofgem, there will be a change for the better in this approach to the cumulative impact of the current connections pipeline for the Suffolk Coastal area.

SECTIONS 1 & 2 COMMUNITY STAKEHOLDERS; OPTION SELECTION AFTER COMMUNITY ENGAGEMENT

| Ofgem requirement | NGET BP | Our experience | | | | | | | | |
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| <p>(1)Companies should continue to ensure that consumers and stakeholders remain at the heart of their RIIO-3 business planning process;</p> <p>(2)How do TOs assess an option's impact on the environment and local communities, how are the effects minimised (including requirements relating to visual amenity with reference to national and regional statutory requirements), and how do stakeholder inputs factor into the optioneering?</p> | <p>Chair’s Introduction:</p> <p>Our engagement programme across eight regions reached more than 12,000 people and over 1,000 organisations. This process informed our regional blueprints, which formed the basis of all our investment considerations and gives us a baseline to iterate from as society’s needs continue to evolve.</p> <p>.</p> | <p>SECTION 1 NATIONAL GRID’S LACK OF TRANSPARENCY and POOR CONSULTATION ;</p> <p>SECTION 2 FAILURE TO INCLUDE COMMUNITY STAKEHOLDERS IN THE DEVELOPMENT OF OPTIONS</p> <p>We have concerns that NGET ’s business plan pledges are not reflected in reality and believe that National Grid has breached the Gunning Principles in a number of ways. We are taking legal advice on this. We will show examples below as case studies where these principles have not been followed.</p> <p>Since 2005 Suffolk Coastal has had to go through a number of DCOs and have found National Grid’s engagement, transparency and behaviour to be furtive and their aims achieved by stealth.</p> <p>We give the evidence for the following energy projects in four case studies:</p> <table><tr><td>1 Consultation failure</td><td>EAST ANGLIA ONE (2000 to 2014)</td></tr><tr><td>2 Option failure</td><td>GREATER GABBARD (2005-2012)</td></tr><tr><td>3 Consultation failure</td><td>EAST ANGLIA ONE NORTH, EAST ANGLIA TWO (2017-22)</td></tr><tr><td>4 Option failure and Consultation failure</td><td>SEA LINK (2022 to date)</td></tr></table> | 1 Consultation failure | EAST ANGLIA ONE (2000 to 2014) | 2 Option failure | GREATER GABBARD (2005-2012) | 3 Consultation failure | EAST ANGLIA ONE NORTH, EAST ANGLIA TWO (2017-22) | 4 Option failure and Consultation failure | SEA LINK (2022 to date) |
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| <p>Strategic Optioneering (4.31, p28)</p> <p>Timings and risks: How do TOs consider the advantages and disadvantages around the delivery timings and risk of different options; and how do TOs consider the impacts of options across multiple price controls</p> <p>(1) Companies should continue to ensure that consumers and stakeholders remain at the heart of their RIIO-3 business planning process;</p> | <p>How we will accelerate connections for our customers (2.2 p 36)</p> <p>There is a clear imperative to deliver infrastructure quickly to achieve broader societal goals, including net zero. As we do, we need to stay flexible to respond to Clean Power 2030 and connections reform. We will invest in the network to provide the capacity required by NESO's 2024 Future Energy Scenarios Holistic Transition pathway</p> <p>1.6 (p27) We have to deliver the highest standards of public consultations and community relations so we can develop infrastructure proposals which are shaped by local input and create a greater level of community acceptance</p> | <p>By way of introduction to the studies, we first of all look at the actual needs case for this last project, Sealink, and its poor fit into the process of strategic optioneering set out in the Business Plan. In our concluding statements, we also refer back to other options that might have been available to reduce the impact of this and other current strategic options.</p> <p>NEEDS CASE – Sealink</p> <p>NGET positions SeaLink as a requirement to get to net zero by 2030, but there is no 'needs case' for Sea Link until 2035 or later when Sizewell is built. The same with the Pylons, it is too early to build new pylons and upgrading of the present grid should take precedence. This is detailed in two independent reports: Hiorns report: https://acrobat.adobe.com/id/urn:aaid:sc:EU:f91d1465-de2a-4049-bc37-6d1bc6981adc CPRE's Greening the Great Grid Upgrade: https://www.suffolksociety.org/greening-the-great-grid-upgrade/</p> <p>1. EAST ANGLIA ONE (2000 to 2014) A case study in technical obfuscation and concealment of long term intention, with the public left uninformed</p> <p>Below is an extract from Scottish Power Renewables final DCO submission for East Anglia One (EA1) windfarm for a non-material change. This was approved by the then Department of Energy and Climate Change, Ofgem, then the local authorities of Suffolk Coastal the Bramford area. Nowhere does it state WHY the change was required, only referring obliquely to "Contract for Difference", which is a commercial decision not a technical decision. The technical decision to change from HVDC to HVAC is blithely remarked upon as a "non-material change" carefully omitting to point out that this would</p> |
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| | | <p>necessitate the building of a completely new National Grid substation to accommodate the residue of EA1 subsequently called EA1(North) and EA2. To use an airline analogy where Boeing is contracted to supply 3 aircraft each capable of carrying 120 passengers to say Ryanair, I doubt that Ryanair would regard a change by Boeing to supply one aircraft seating just 70 passengers, (EA1), a second carrying 120 passengers (EA3) with the shortfall being met by two aircraft each carrying 80 or 90 passengers (EA1N and EA2) the latter needing to operate out of another airport, as a non-material change!</p> <p>Extract from Reference – EA1-CON-F-GBE-008553 – June 2016</p> <ol style="list-style-type: none"> 1. <i>East Anglia ONE Limited (EAOL) was awarded Development Consent Order (DCO) by the Secretary of State Department of Energy and Climate Change (DECC) on June 17th 2014 for East Anglia ONE Offshore Wind Farm (EA ONE). The DCO granted consent for the development of a 1200MW offshore windfarm and associated infrastructure.</i> 2. <i>In February 2015 EAOL secured a Contract for Difference (CfD) award to build a 714MW project</i> 3. <i>and ScottishPower Renewables announced its role in leading East Anglia ONE towards construction. In April 2015 EAOL submitted a non- material change application to DECC to amend the consent from direct current (DC) technology to alternating current (AC). In March 2016 DECC authorised the proposed change application and issued an Amendments Order.</i> <p><i>The onshore construction works associated with EA comprise the following, which is based on the AC technology with an installed capacity of 714MW and transmission connection of 680MW;</i></p> <ul style="list-style-type: none"> <i>o • A landfall site at Bawdsey, Suffolk</i> <i>o • Up to six underground cables, approx. 37km in length</i> <i>o • Up to four cable ducts for future East Anglia Three project</i> <i>o • An onshore substation located at Bramford next to existing National Grid infrastructure</i> <p>The extract carefully omits the fact that the use of AC requires access to 6 ducts (duplicated 3 phase). The later EA3 requires access to 4 ducts (duplicated HVDC bi-</p> |
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| <p>(2)How do TOs assess an option's impact on the environment and local communities, how are the effects minimised (including requirements relating to visual amenity with reference to national and regional statutory</p> | <p>(5.3 p79) We have five key objectives for our DSAP, based on our customer and stakeholder priorities...[...] (3) Delivering for customers and stakeholders <i>(4) Building trust through data Transparency</i></p> <p>(1.3 p5) We have a responsibility to consumers to deliver efficiently. This requires innovation and grid enhancing technologies to avoid the need to build more new network.</p> <p>(2.2 p38) We are adopting longer-term supply chain strategies, designed to create the certainty required for suppliers to invest in increasing the overall available capacity We will use competition to drive efficiency and support consumer value, selecting our partners using a more</p> | <p>polar). This leaves just 2 spare ducts 2 out of the original 12, which is insufficient for any meaningful power supply. No mention is made of the significantly greater power loss attributable to HVAC buried cables.</p> <p>Friston resident, Chris Wheeler who is sadly no longer with us, requested a FOI for NGET's Connection and Infrastructure Options Note (CION) document explaining the process of site selection of Friston. What came back was heavily redacted citing "commercial confidentiality" issues.</p> <p>On deciphering the CION document, it can be seen that National Grid had all along planned a new substation in the vicinity of Sizewell to accommodate Nautilus and Eurolink to be active in the same time frame as EA1(N) and EA2. No mention is made of SeaLink which we knew was being considered in NG longer term plans. Suffolk County, District, Town and Parish Councils were not consulted on this decision until 2017 and none of this stealth approach was accepted by the planning Inspectorate as evidence of cumulative impact.</p> <p>2. GREATER GABBARD (2005-2012) – a case study in settling options ahead of consultation or public engagement</p> <p>When the Greater Gabbard offshore windfarm was proposed the developer and National Grid representatives attended a meeting at Sizewell with the residents. Plans were at an advanced stage and the residents were pretty much told it was a fait accompli that cables and substations were coming. Residents were naturally appalled and dismayed and responded vociferously and gave the presenters a very hard time. Their concerns were not taken into account and the project went ahead regardless.</p> |
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| <p>requirements), and how do stakeholder inputs factor into the optioneering?</p> | <p>collaborative, partnership approach.</p> <p>(1.6 p27) The scale of network reinforcement we are undertaking requires early and constructive engagement with planning and consenting authorities. We have to deliver the highest standards of public consultations and community relations so we can develop infrastructure proposals which are shaped by local input and create a greater level of community acceptance.</p> | <p>3. EAST ANGLIA ONE NORTH and EAST ANGLIA TWO (2017 to 2022) – a case study in failing to take ownership and accountability</p> <p>During the early days of ScottishPower Renewables (SPR) East Anglian One North (EA1N) and East Anglia Two (EA2) offshore wind projects, attempts to engage with National Grid were met with resistance and reluctance to discuss any details with members of the public. Statements such as <i>'all correspondence on this matter are with the primary developer'</i> was their excuse.</p> <p>During SPR in-person consultation days for EA1N and EA2 there was no National Grid presence to explain the 'needs case' for a substation in Friston. Questions on the decision making process for substation location (CION) received responses such as 'commercially sensitive' or 'look at the Network Operating Assessment (NOA)' a highly technical document beyond residents comprehension. Resorting to an FOI for the CION document was the only recourse and even then, it was a heavily redacted copy.</p> <p>What was even more shocking during the National Strategic Infrastructure DCO examination, NGET refused the Government appointed Planning Inspectorate's requests to attend hearings. A further indication of their disregard for the process.</p> <p>National Grid's behaviour - Two excerpts from local resident's DCO Written Representations:</p> <p><i>"..... my observationsrefer to the lack of consultation by National Grid for the development of a Grid Sub Station "Hub" on the back of the SPR project. it is evident that National Grid are developing a Grid Connection Hub by stealth. They are using the work of SPR to deliver a National Grid project without any planning regulation or consultation. We know of many other energy projects planned for this area, such as Galloper, Gabbard, Nautilus, Eurolink etc. all being offered grid connections at Friston and to really demonstrate what a shambles it all is National Grid are even proposing 2 connections (SCDC1 & SCDC2) to relay the energy from</i></p> |
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| | (2.3 p42) We have balanced trade-offs between our | <p>here to Kent." 2.11.20 https://acrobat.adobe.com/id/urn:aaid:sc:EU:1ac97c42-1a3b-4703-96f2-71655c1d871a</p> <p><i>"As we all know... National Grid have been invisible in this process.... and I am interested to know how they got the Applicant to do their bidding? What incentivised the Applicant to take on National Grid's responsibilities? We need absolute transparency on this. I am also at a loss to understand why National Grid's... Friston Substation has not been classed as a separate NSIP D.C.O. So, I am asking the Examining Authorities to identify and highlight the relevant Government policy which allows a private developer, such as the National Grid, to side step the NSIP process and piggy back on another developers D.C.O." [These questions were never answered]. 5.11.2020</i></p> <p>https://acrobat.adobe.com/id/urn:aaid:sc:EU:c2a40fdb-858f-45fb-94e8-5ca1c4007b94</p> <p>National Grid has consistently avoided any contact with Stakeholders or local interest groups preferring to hide behind Scottish Power Renewables getting them to do their bidding, and behind a smokescreen of avoidance and obfuscation.</p> <p>In July 2019, SEAS sister campaign group SASES wrote to Ofgem with eleven detailed questions regarding Ofgem's role in the SPR EA1N and EA2, RIIO-ET1, CION and environmental impact.</p> <p>Question 4 asked: Is Ofgem aware that National Grid is refusing to fully engage with key stakeholders and Consultees? We understand that includes Suffolk County Council and Historic England. Mr Brearley's response to that question simply reminded SASES that SPR was leading stakeholder engagement as the party applying for DCO permission for development of the onshore connection. <u>Is this the response we will continue to receive from Ofgem or shall a new leaf be turned and Ofgem will start to regulate effectively.</u></p> <p>Ofgem has failed in its duty to ensure consumers/local communities were fully briefed on the National Grid plan for Friston to be a major energy HUB.</p> |
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| | <p>environmental goals and other critical elements of our RIIO-T3 plan. Our stakeholder engagement and understanding of priorities has informed our target setting and optioneering.</p> <p>1.6 (p27) We have to deliver the highest standards of public consultations and community relations so we can develop infrastructure proposals which are shaped by local input and create a greater level of community acceptance.</p> <p>(1.5 p18) Since 2022, we have listened to the views of 10,000 consumers, including households, small businesses and large industry, triangulating with available papers, publications and research. Through bilaterals, focus</p> | <p>4. SEA LINK (2022 to date) – a case study in closing options <i>before</i> engagement with communities, and the resulting poor consultative processes</p> <p>We would like to see NGET’s Sea Link Connection and Infrastructure Options Note (CION). If this has not been done then we request a full examination of the alternative landfall points for Suffolk and Essex be completed along with a transparent comparison of costs for a number of hub site options including Grain, Bradwell and others. We have always said that if an offshore grid was built then Sea Link would be redundant saving the tax payer £1.8bn. We believe that an offshore grid was discounted before it was ever examined because National Grid wanted to be the architect and the builder – unfortunately in its present monopolistic situation, this is exactly what happens.</p> <p>In November 2022, over 400 residents attended NGET’s first Sea Link consultation. The main complaint was that the staff present were largely technical or PR people tasked with carrying out the project, who were thus unable to respond to questions about alternative options such as an offshore grid and brownfield sites. It was once again a consultation about the physical details of an already formulated project rather than about the merits of the strategy. No Senior NGET executives were in attendance.</p> <p>Feedback forms were skewed to the benefit of the project - asking respondents to answer general statements is <u>not effective consultation and is misleading</u>. Of course, everyone will say they agree that delivering net zero should be a priority, and that the UK needs to improve its energy security, and we should keep energy prices down - but this project specifically in these locations will not be the only way to achieve this. We believe NGET were attempting to gain support for the project falsely.</p> <p>The Statutory consultation in October 2023 was attended by a Senior NGET Director who, when asked what NGET would do if Friston did not happen due to Judicial Reviews or other issues, confirmed it was possible to connect direct to Sizewell’s Substation and use the Bramford 400kv pylons. However, NGET representatives had obviously been tutored to say that Sea Link would apply for the Friston Substation should SPR not go ahead.</p> |
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| | <p>groups, workshops, summits, webinars and regional forums, we have gathered insights from more than 2,000 stakeholders. We have supplemented this with market research. As part of the Great Grid Upgrade, we have met with more than 23,300 community members in the areas where we are already expanding our network.</p> | <p>This so called ‘Statutory’ consultation took none of the Councils or Resident’s comments on board and ignored alternative suggestions. NGET stated they had listened to our feedback and then disingenuously carried on with the same plans put forward in the previous consultation. The level of trust in NGET is extremely low, because they have not demonstrated real regard to our concerns or to the protected internationally important habitats, or our impacted community. See SEAS Sea Link submission. The Sea Link PIER states impacts are “not significant” and this is false, considering the background levels and thresholds of harm.</p> <p>We believe also that they did not look at RAF Leiston, the perfect site for convertor stations (and substations) ignoring County, District, Town & Parish Councils because the cable route would be longer than siting them next to the 5,000 populated town of Saxmundham.</p> <p>SeaLink did not supply copies of their PIER documents to Councils or Libraries where they could be studied and responded to responsibly. When they were requested, the trite reply was ‘no, we are saving trees’. Instead, they had to be printed at great cost to residents and councils.</p> <p>PENDING SEA LINK DCO</p> <p>The most recent problem with Sea Link’s consultation process is a November 2024 non-material change consultation, being sent to a handful of impacted stakeholders. NGET may have perceived them as non-material changes but these changes, especially the re-location of a bridge, have a ripple effect and impact the whole of Suffolk Coastal.</p> <p>Also, Sea Link have not posted a Programme Document on their website which was requested by the Planning Inspectorate on 29 November. This document has important information and severely inhibits Councils and Communities participating in the process.</p> |
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| (2) How do TOs assess an option's impact on the environment and local communities, how are the effects minimised (including requirements relating to visual amenity with reference to national | | <p>CONCLUSION</p> <p>We do not believe NGET's consultation process has adhered to Ofgem's requirements. There is no community acceptance of Sea Link's proposals as presented. NGET's Claims that this many thousand or that many hundred have attended meetings or presentations, or contributed opinions, are not supported by any evidence that these opinions have been considered and acted upon, rather than just collected.</p> |
| | SECTION 3 | POOR CONSULTATIVE PROCESSES, ACCOUNTABILITY AND TRANSPARENCY – THREE CASE STUDIES |
| | 1.6 (p27) We are consulting and communicating with communities early in the planning process. We have put in place platforms which enable residents to raise their concerns and suggestions. We make changes to our proposals where possible and if we cannot, we explain why | <p>NGET's claim (opposite) is plainly incorrect, especially 'we make changes to our proposals where possible'. For examples, see the preceding case studies above - NGET did not consult at all for moving EA1N and EA2 to Friston, nor did they consult early for Greater Gabbard – both were <i>faits accomplis</i>. NGET hid Sea Link 1&2 (SCD1 & SCD2) from the EA1N/EA2 Planning Inspectorate so that the cumulative impact could not be taken into account along with Nautilus, Lionlink and Sizewell C – 6 NSIP Energy projects built over 12 years in 5sq mile, too much for any community to bear.</p> <p>NGET has not taken into account any of the alternatives that Community Groups have put forward. Time and time again a new consultation comes back with the same</p> |

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| and regional statutory requirements), and how do stakeholder inputs factor into the optioneering? | 4.2 (B3.1) 'As well as supporting local communities, to manage the risks to us being able to deliver this investment plan we also need to engage with them to build their understanding of the need and support for, new transmission infrastructure.' | <p>proposals as the previous consultation, but slightly tweaked. Explanations 'why' are weak and turned into mantras by NGET representatives.</p> <ul style="list-style-type: none"> - HVDC Cables technology 'is not there yet'. - Offshore Grid 'not possible' - 'No brownfield sites' in Suffolk - 'Sea Link will apply for the Friston Grid'.... <p>That is not consultation under any definition. Our case studies show that National Grid has consistently avoided any contact with Stakeholders or local interest groups preferring to hide behind Scottish Power Renewables getting them to do their bidding, and behind a smokescreen of avoidance and obfuscation.</p> |
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| | <p>2.3 (p 42) We have balanced trade-offs between our environmental goals and other critical elements of our RII0-T3 plan. Our stakeholder engagement and understanding of priorities has informed our target setting and optioneering</p> | <p><i>Case study - SF6 : SULPHUR HEXAFLUORIDE 6 TRADE OFF</i></p> <p><i>"The funding is to deliver physical intervention on existing and SF6 emissions forecasted / anticipated (palliative) SF6 leaks at sites with the Reduction highest risk of SF6 emissions. Carbon benefit 162,000 tCO2e</i></p> <p><i>We decided not to follow accelerated removal of SF6 from our network as this would prevent us being able to expand the grid to help decarbonise the economy. This is essentially a sequencing choice as we remain committed to 2050 targets. We will increase our use of other fluorinated gases (F gases), that have excellent electrical insulation capabilities, but substantially lower global warming potential than SF6."</i></p> <p><i>NGET Business Plan pp 42/43</i></p> <p>These two statements in the Business Plan are conflicting. The Dutch use manual switching gear – no harm to life or global warming. This January, National Grid are installing the first SF6-free technology at National Grid's new 400kV Bengeworth Road substation, so the technology is readily available. However, NGET's RII03 Plans are <u>not to accelerate removal of SF6, but replace with other harmful F-Gases</u>. These synthetic F-gases can last in the atmosphere many years or in the case of SF6 (24,000 times more dangerous than Co2) centuries. The gases cannot be seen and do not smell so how can we tell if there has been a leak?</p> <p>Here in Suffolk Coastal, 3 years on from consent of EA1N and EA2 we still have no idea whether NG's Friston Substation and those adjoined to it (up to 4 more) will be GFI/SF6 circuit breakers, thereby severely endangering the population of Friston, Saxmundham and surrounding communities. An important reason why substations and convertor stations be sited at brownfield or pre-industrialised sites. National Grid says the reason not to continue to accelerate SF6 from the network is that it would '<i>prevent us being able to expand the grid to help decarbonise the economy</i>' This is ludicrous and confirms the government Clean Energy 2030 target a pipe dream, especially if National Grid</p> |
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| | | <p>continually downgrade their promises and choose the cheapest method to reach 2030 at the expense of consumers and the environment.</p> <p>The other area National Grid have downgraded is Fire Safety - Even though challenged during the EA1N/EA2 DCO, neither National Grid or Scottish Power Renewables presented a fire precaution plan. For the 25 to 40 year lifespan of the substations, there is a likelihood of 1 or 2 fires within their operation. Sizewell C has an extensive plan, but National Grid will leave it up to the local voluntary fire services at the expense of the tax payer, taking them away from their daily duties of attending local fires.</p> <p>There seems to be some secrecy about any SF6 leaks as this article reports https://www.cambsnews.co.uk/news/scottishpower-1m-wind-turbine-blaze-at-coldham-cambridgeshire/34964/ when a turbine went on fire, SF6 escaped and workers had to be evacuated.</p> <p>Ofgem needs to be aware of such immoral and worst case of negligent behaviour that National Grid did <u>NOT</u> attend the DCO process to address these issues even though invited by the Planning Inspectorate to do so.</p> |
| | <p>1.6 (p27) We are deploying digital tools, like 3D visualisations, to make it easier for people to engage with the developments we are proposing for their communities. This is helping in some cases to assuage concerns.</p> | <p>Case Study – Presentation styles and materials for community engagement</p> <p>National Grid pulls the wool over Ofgem's eyes</p> <p>We have not seen and have certainly not been notified of any Sea Link digital 3D visualisations to make it easier to engage, nor are we aware of any concerns that have been assuaged in this way. NGET have deployed low resolution maps and illustrations that are biased in every way towards the effect they desire. We can't even check them as no PIER documents have been sent to Town/ Parish Councils or to Libraries and when requested they say no with excuses that they are trying to save trees.</p> |

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| | <p>(1.3 p7) This plan has been built on the foundations of NESO's analysis of consumer value, is aligned to government's ambitions, and is informed by</p> | <p>However, an NG VIDEO has been a useful tool. Their YouTube video declares that AN OFFSHORE GRID IS FASTER, CHEAPER AND REDUCES IMPACT ON COMMUNITIES - while NGET's Business Plan continues to promote outdated technology, with wind farms and interconnectors connected one by one to onshore electricity grids. However, in April 2024 National Grid produced a video declaring that the connection of offshore wind farms to MPIs (Offshore Hybrid Assets) 'means building the infrastructure is faster and cheaper and it reduces the impact on coastal communities.'.</p> <p>Since 2022 Community Campaign groups have been saying that an offshore grid is faster, cheaper and better – see the Great British Offshore Grid. It is no wonder that when this video was posted on Social Media in early February 2025 it was made private within 3 hours. A screenshot and transcript of the video is attached as annex A to this document; but the transcript includes, for example, the following statements:</p> <p><i>'We need a better way to connect offshore wind; MultiPurpose Interconnectors connect clusters of offshore wind farms to multiple countries via interconnectors, reducing the amount of infrastructure needed. This means building the infrastructure is cheaper and it reduces the impact on local communities.'</i></p> <p>Even Ofgem agreed in their March '24 report p.19 that Offshore Hybrid Assets are the way forward.</p> <p>Case Study – Inconsistency with, or concealment of, past planning outcomes</p> <p>NATIONAL GRID DOESN'T BELIEVE ITS OWN REPORTS</p> <p>NG ESO published a report in December 2020 showing a £2 billion CAPEX saving for East Anglia alone if offshore integrated solutions were adopted. Savings include sharing of infrastructure. Note this CAPEX saving is for all stakeholders, not just National Grid's narrow and simplistic figures which only cover their own costs. For Britain as a whole, THERE IS A SAVING OF AT LEAST £6 BILLION IF WE PIVOT NOW TO A MESHED OFFSHORE GRID. Ofgem needs to challenge NGET for transparency and commission an <u>independent</u> Cost Benefit Assessment of their own.</p> |
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| | <p>consumer research and deep stakeholder engagement.....Ofgem formally classifies projects as baseline (more certain) or pipeline (less certain). We have included in our baseline all projects where we have certainty on both the need for the project and its cost..</p> <p>(1.1 p2) The decisions we make in the next five years will shape the energy system and our society for generations to come. It is our collective responsibility to ensure that is done with long term consumer value as its foundation.</p> <p><i>[SEAS emphasis]</i></p> | <p>INTERCONNECTORS ARE PROFITABLE</p> <p>The Interconnector Register at 4.2.25 records that National Grid's commercial arm owns 38.24% of UK's Interconnectors which is a very good earner for the NG plc; in addition, every radial connection earns a connection fee for NGET. Whilst Sea Link is a mechanism for National Grid to continue to own the Grid. We can only surmise the reason for sticking with outmoded technology of radial point to point grid connections is that it is more lucrative for National Grid plc.</p> <p>https://www.suffolkenergyactionsolutions.co.uk/wp-content/uploads/2025/02/interconnector-register-04-february-2025-highlighted.xlsx</p> <p>CONCLUSION – National Grid Group plc have been disingenuous and furtive from the start of privatisation in 1990. It has run down the grid, not invested in upgrades and new technology, given (and continues to give) huge dividends to shareholders and enormous bonuses to CEOs and other executives.</p> <p>This lack of investment continues and we are ending up with an outdated grid system:</p> <ul style="list-style-type: none"> • choosing protected locations to site new infrastructure because it is easier and cheaper than rejuvenating brownfield sites closer to demand. • lack of investment in an Integrated Offshore Grid, • building unnecessary pylons and new substations • not investing in HVDC undergrounding, instead of Pylons. • not accelerating the removal of SF6 gas from infrastructure, <p>The transition from NG ESO to NESO is a missed opportunity to shake up the system, to question the lack of a robust master plan. It is a side step for National Grid - the same people work in the same positions and continue to have a vested interest in assuring that National Grid Group plc continues to profit in their various guises. Until we have full transparency and a true independent Cost Benefit Analysis for an integrated offshore grid, Ofgem should not approve NGET's RIIO3 Business Plan.</p> |
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| | SECTION 4 | ENVIRONMENTAL IMPACTS – REQUIREMENTS, COMMITMENTS AND OUR EXPERIENCE DURING CONSULTATION PROCESSES |
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| Ofgem requirement | NGET BP | Our experience |
| 4.48 provides OFGEM's view of the minimum level of ambition they would expect should be set out in company business plans in relation to mitigating their environmental impact. Where these initiatives, measures, or templates are not thought to be appropriate or adequate, companies should provide clear justification for why they believe this to be the case in the notes section of the given table. | <p>(2.3 P39) General commitments</p> <ul style="list-style-type: none"> - There is a diverse range of views amongst our stakeholders on environmental priorities, which is reflected in the number and detail of our commitments which goes further than just decarbonising our own activities. - Our research showed protecting and improving wildlife and natural environments is valued by consumers. | <ul style="list-style-type: none"> - There has been a consistent and unambiguous community response to NGET projects and programme consultation processes for the last decade; community stakeholders are by now aware that local environmental and biodiversity considerations are coming very low on the list of NGET's priorities - It is valued by consumers; but the Sea Link proposals choose a Suffolk landfall between Aldeburgh and Thorpeness which is within the National Landscape and crosses RSPB's North Warren nature reserve, SPA and SSSI, simply because it is claimed to be the cheapest route. The reserve is part of the East Atlantic Flyway and is nominated for UNESCO designation. <p>None of these important environmental protections are being respected and NGET are ignoring local consumers and stakeholders. vitiated,</p> |
| 4.49 Each company should submit an Environmental Action Plan (EAP) alongside its business plan which draws together the | <ul style="list-style-type: none"> - Feedback from our carbon neutral construction consultation supported us reducing construction emissions. | The carbon capture numbers within the business plan are redacted. NG positions SeaLink as a requirement to get to net zero by 2030, but carbon calculations are not provided in any of the consultation packs for the project, so this proposition cannot be justified. The calculations that show how turning a RSPB nature reserve and hectares of farmland into concrete for the SeaLink project can be considered carbon neutral have |

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| <p>direct carbon impacts claimed in Investment Decision Pack submissions (eg leakage, losses, EV fleet) and will include a list of all IDP submissions where: 'carbon reduction is the main driver of the proposal'</p> | | <p>never been provided. Nor has the guarantee that interconnectors do not bring in Fossil Fuels from across the North Sea.</p> <ul style="list-style-type: none"> - There is nothing in the Sealink project documents about the carbon footprint the amount of concrete used, truck movement emissions, soil removal and the problems with disposal, showing how easy it is to write plans and then fail to deliver them during a project. - There is no mention of circular economies and sustainability of the windfarms in their current plan 2030 because the companies are not directly owned by NG and 'having a commitment to work with' these companies is not showing the leadership that is needed. OFGEM have a role to do this and push the companies to do this. |
| <p>4.50 In the EAP, companies should describe how they will mitigate and improve the environmental impact of their networks. An EAP should encompass activities network companies intend to undertake in RIIO-3 to decarbonise their network and to reduce the wider impact of network activity on the environment. EAPs should explain the methodology that has</p> | <ul style="list-style-type: none"> - Our approach to compensating residual emissions was well received with a stakeholder clear preference for UK projects with local benefits. Government has signalled their support for communities hosting clean infrastructure to benefit from doing so. - A step change from RIIO2 to RIIO3 [Extract from NGET EAP section 4.6 'How we will do things differently', <i>Net Zero</i>, 'Additional Focus'] | <ul style="list-style-type: none"> - Extensive redaction throughout the EAP annex itself renders much of the material incomprehensible, and commitments unverifiable. |

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| <p>been used to assess the environmental impacts of the company's network and business plan.</p> | <p>Meeting our 2030 carbon targets will require proven and repeatable non-outage repair techniques, automated real-time monitoring of SF₆ leakage, and dynamic delivery frameworks.</p> | |
| | <p>EAP 4.3.2 'Nature Positive' – headline commitment: 'We will contribute to the preservation restoration and enhancement of the natural environment and contribute to the wider global Nature Positive goal to 'halt and reverse nature loss by 2030'.</p> | <p>In the detail, these bold commitments are not matched in programme outcomes. For example, at consultations, NGET Sea Link representatives said that the cable corridors will be back to normal within two years. Another respondent to this Call For Evidence has photographic evidence to the contrary from a farmer in North Norfolk that the heat from the HVDC Cables of Dudgeon Windfarm cause long term damage to the land.</p> <div data-bbox="1072 635 1760 887">  </div> <p>The Farmer said to the developer there would be long term effects undergrounded HVDC cables on the soil. There are! "...Although the Dudgeon Easement is only 7m width we are measuring a 2 degree C increase in soil temperatures. Soil structure hasn't recovered ten years after cabling. I am still measuring crop yield losses of up to 50%. The drainage system installed is already in need of repair. There is no sign that soils will recover. Hedges/trees have still not been replaced."</p> |
| <p>4.51 A network company's progress against its EAP will be detailed in its Annual Environmental Report (AER). This will comprise of a</p> | <p>From the Chair's foreword to AER 2024: 'We are an environmental leader in the energy sector thanks to all our employees who take proactive steps to drive positive change. They have a form (<i>sic</i>)</p> | <p>Local communities in Suffolk and along the East coasts of England and Scotland might doubt this claim of environmental leadership and sustainable business; if offshore hybrid assets were a sustainable, progressive and cost-effective option in April 2024, why was the NGET video making this claim taken offline as soon as it became public recently? The environmentally friendly and more sustainable offshore options for NGET projects have consistently been taken out of scope in consultation despite clear evidence</p> |

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| commentary document and a key performance indicator (KPI) document, as described in our SSMD. | focus on the long-term sustainability of our business.' | (including Ofgem's own reports) that they are an excellent proposition, widely in use elsewhere in Europe. |
| 4.52 EAPs should be developed taking into account the baseline expectations set out below. The baseline expectations reflect the minimum level of ambition we expect companies to demonstrate for individual areas. | <p>Sample Business Plan Commitments:</p> <p>B4.6 Improve our circular economy maturity levels, reduce waste and recycle/re-use more content in construction</p> <p>B4.9 Disclose our nature-related risks and opportunities, and work with other transmission owners and common supply chain to manage nature and ecological risks</p> | <p>As far as we can see NG has no power to influence the carbon waste footprint of their stakeholders and partners – for example, the wind farm generators. Turbine Blades at end of life need a solution. They are currently made of fibre-glass and are being buried in land based tips or buried at end of life. A rush to wind-power when they have no control over this will nullify this claim. They must be held to account over this.</p> <p>'Disclosure' of risks and opportunities is vitiated, when so much of the Business Plan is redacted. There can be no external stakeholder confidence in its trustworthiness as a result.</p> |

CONCLUSION

We believe National Grid's Business Plan has not fully complied with Ofgem requirements in a number of areas;

STAKEHOLDERS

- **stakeholders are not at the heart of NGET's plans.** We do not believe NGET's consultation process has adhered to Ofgem's requirements. NGET's Claims that this many thousand or that many hundred have attended meetings or presentations, or contributed opinions, are not supported by any evidence that these opinions have been considered and acted upon, rather than just collected. Presently, there is no community acceptance of Sea Link's proposals.

PROJECT SELECTION AND CONSULTATION

- **failure to engage with a 'choice of option'** – In Suffolk, there has been a consistent and unambiguous community response opposing NGET projects and programme consultation processes for the last decade; Early consultation has been non-existent, plans presented as a fait accompli, conflicting information from NGET representatives, difficulty in accessing information. Ofgem needs to enforce, through regulatory means, that NGET consult much earlier and discontinue their practice of presenting plans without alternative choices.

APPRAISAL and TRANSPARENCY

- **Lack of transparency in costings** – National Grid need to be transparent with costings so tangible scrutiny can be assessed by all. The East Anglia Study costings did not take into account a true comparison of an offshore grid v new onshore pylons, N2T. SEAS had to commission a cost benefit assessment on the suitability of Bradwell v Friston as NGET would not supply one.
- **lack of appraisal of an Offshore Grid** We believe that Offshore options are more environmentally friendly and more sustainable. We asked Ofgem to independently review National Grid's NG ESO report of 2020 and recent video illustrating the benefits of OHAs and a Modular Offshore Grid (MOG). *Our proposals were at that time (as we were told by DESNZ) aligned with governmental; thinking, and were considered to be a good basis for two pilot tests. We costed the potential savings, based on our original research and using NG's December 2020 report, and found potential £6bn savings across the UK, with £2bn in East Anglia.* Had NGET gone down the MOG route in 2020 when SEAS proposed that Friston energy projects should be a pilot for a MOG, NG would not have the vast and growing opposition from East Anglia and other regional consumers, and by now would be well on the way to Net Zero 2030. It is National Grid who are the BLOCKERS due to their monopoly, corporate greed and lack of investment and foresight.

- **The refusal to follow Treasury Green Book Guidance** – Ofgem need to enforce a level playing field where NGET and all other Transmission Owners have to comply with the Treasury Green Book Guidance. The system should not be “one rule for us, another rule for them”.

ENVIRONMENT

- **investment in these plans will be at the cost the environment.** Community stakeholders are very aware that local environmental and biodiversity considerations are coming very low on the list of NGET’s priorities. NGET needs to revisit its Environmental Action Plan to include an evaluation of the natural capital, carbon and biodiversity projects and their alternatives, taking new laws into account.

GENERAL STRUCTURAL CONCERNS ABOUT THE AIMS AND DELIVERY OF THE RIIO3 BUSINESS PLANS

- As a voluntary group that has been actively reviewing and challenging energy infrastructure plans for the last five years, we have arrived at **significant concerns over the governance of project design, consultative processes, and a lack of long term and balanced strategic planning.** We feel this review is a vital opportunity to describe these concerns, and to share our local and very detailed knowledge of how these concerns have arisen, and to make a few more general points illustrating NGET’s overall failure to comply with Ofgem guidance. To start with, in this National Grid Business Plan there is a total absence of discussion regarding the key issues raised by the Nick Winser Report:
 - Community involvement from the outset on the choice of hub sites. Local communities know their countryside better than anyone;
 - The need to apply Holistic Network Design criteria (HND) which is central to good planning. Other North Sea countries apply these criteria rigorously. Consumer short- term price is not the driver. Equal weight is given to ecology, economy, community disruption;
 - There is no point bringing in the CP30 collective and not asking them to question these National Grid plans which are flawed and not in the best interests of Britain. There are better solutions avoiding needless destruction.
- Why is CP30 not mandated to question these plans? From the Energy Security and Net Zero Select Committee discourse at the meeting on 5 February it was clear that there was no questioning of the basic plan. That means there is no organisation challenging what National Grid is proposing. That is absolutely wrong.
- There seems to be a conspiracy of silence around offshore grids. No one dare mention the words – and yet **Modular Offshore Grids** must be a central element of any future grid. The deafening silence on this solution will doom us in the medium term to fall behind our North Sea neighbours on one of the most pressing and complex issues we face as a country. For no reason.

- We suggest that there is another area where NGET's Business Plan fails to mention a very important element of their planning structure. It is simply that when the UK Grid was sold by the Thatcher Government to National Grid, they were gifted the name 'National' which is, of course, potentially very misleading. The majority of the public believe that National Grid is a tax-payer owned entity; and do not realise that it is a publicly listed company that never invested in the Grid - but has paid very large sums indeed to Executives and Shareholders. The advertising and PR suggest a very virtuous British company working in the interests of British communities. That is disingenuous and misleading. National Grid plc has a monopoly which allows them to ride roughshod over communities and there is no mitigation for the catastrophic permanent adverse impacts on specific communities in the Aldeburgh/ Thorpeness/ Friston/ Saxmundham area where 15% jobs in tourism will be lost each year of construction, habitats will be desecrated, landscapes will be scarred and broken, disenfranchised communities are being treated with disdain. We deplore this Business Plan. We object to it. We appeal to you the reader to join us in challenging the core design principles and ask objective advisers from outside the UK to be engaged to reassess these self-serving National Grid plc plans.

Thank you for inviting Community Stakeholders to respond to this consultation which will help to inform the next stages. We are happy to supply further information or documents should they be required.

SEAS wishes to be considered for inclusion in any future stakeholder engagement. SEAS represent over 20,000 people and have written many papers on the way forward such as the '[Great British Offshore Grid](#)' and '[Accelerating the Transition to Net Zero](#)'

We look forward to seeing how Ofgem will address our concerns above.

The SEAS Team

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ANNEX A

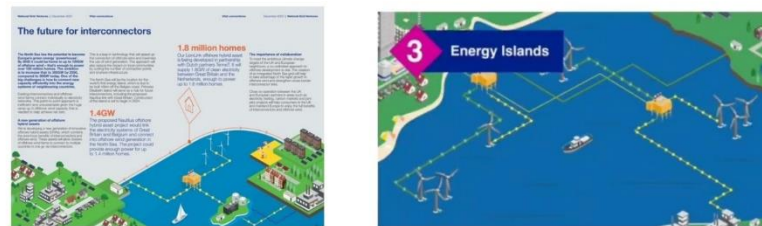
NGET VIDEO TRANSCRIPT

A more recent illustration of National Grid's furtive behaviour is when their 10 month old YouTube video was discovered & caught the attention of multiple campaign groups who shared it right across social media, only for it to be **made private 3 hours later!!**

<https://m.youtube.com/watch?v=jmmbLLTD3pw>

Our social media team was able to take a screen recording of the video which you can view below.

[See video here.](#)



HERE'S A SMALL SECTION OF THE TRANSCRIPT OF THE VIDEO NATIONAL GRID HAS DELETED.

YOU'LL SEE THAT IT READS EXACTLY AS WE HAVE BEEN PROPOSING FOR A BETTER ALTERNATIVE.

"The North Sea is incredibly windy, which makes it perfect for offshore windfarms to generate vast amounts of renewable electricity.

The UK & EU have set big targets for offshore wind generation and underwater electricity cables, interconnectors, that allow clean energy to be shared between countries.

Currently wind farms and interconnectors connect one by one to electricity grids. Given the amount of new wind farms needed, this approach isn't working any more.

We need a better way to connect offshore wind, Multipurpose interconnectors: connect clusters of offshore wind farms to multiple countries via interconnectors, reducing the amount of infrastructure needed.

This means building the infrastructure is faster and cheaper and it reduces the impact on coastal communities."