



LineVision Inc.
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10 February, 2025

Office of Gas and Electricity Markets
Network Price Controls, RIIO T3 Team
10 South Colonnade
Canary Wharf, London, E14 4PU

Dear all,

On December 18, 2024, the Office of Gas and Electricity Markets (Ofgem) opened a stakeholder Call for Evidence for the RIIO T3 price controls that will run from 2026 to 2031. LineVision, Inc. (LineVision) is pleased to submit these comments with respect to the Electricity Transmission (ET) provider's draft Business Plans (BPs).

LineVision is a Grid-Enhancing Technology (GETs) company that provides electric utilities around the world with monitoring solutions for high-voltage transmission lines which can unlock as much as 40% additional capacity on existing lines through Dynamic Line Ratings (DLR). LineVision's non-contact sensors and sophisticated analytics enable actionable insights into the real-time status and long-term health of transmission lines while improving situational awareness, helping to ensure optimal, safe, and reliable operation.

LineVision has worked with National Grid Electric Transmission (NGET) since 2022. To date, we have deployed DLR on 5 circuits of the NGET network and have won the Institute of Asset Management Eason Award for Digital Innovation in 2023 for our collaboration together.¹ These projects are increasingly important as thermal constraint costs have risen to over £500 million in the last full year of data from the National Energy System Operator (NESO).²

NGET's role as a global leader in deploying DLR has provided significant benefits to U.K. consumers. For example, an NGET co-authored paper presented at the 2023 CIGRE Sendai Colloquium identified a 19% increase in average capacity on the SSHARN B7a boundary from our DLR project on the Kirkby – Penwortham – Washway Farm circuit.³

These projects deliver real benefits to U.K. consumers, and as highlighted in the NGET Business Plan summary: their work around DLR has saved customers in excess of £150

¹<https://theiam.org/news/iam-asset-management-excellence-awards-2023/>

² https://www.neso.energy/data-portal/thermal-constraint-costs/thermal_constraint_costs_data_23-24

³<https://4412998.fs1.hubspotusercontent-na1.net/hubfs/4412998/Reducing%20Low%20Carbon%20Generation%20Curtailment%20with%20Dynamic%20Line%20Ratings%20on%20the%20England%20and%20Wales%20Transmission%20System.pdf>



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million under RIIO T2, which is one of the reasons we are excited to more than double the size of our partnership with NGET in 2025 to additional circuits.⁴

We know from experience that scaling DLR from small innovation projects to use in regular grid operations is challenging, so we are encouraged by proposals in many of the Business Plans to expand the deployment of DLR under RIIO T3. Examples include NGET's Atypical EJP Enhanced Ratings Strategy and Scottish Hydro-Electric Transmission's (SHE-T) identification of the "Deployment of Dynamic Line Ratings" under BaU activities as opposed to NIA or SIF funding requests.^{5 6} All BPs should be required to examine how GETs like DLR can relieve congestion to the benefit of customers. We also support many of the comments and Ofgem's initial BP guidance to continue the SO:TO framework that aligns ET incentives for deploying DLR to those who benefit from congestion savings: customers.

Finally, we encourage Ofgem and the ET providers to work diligently through RIIO T3 consultations to establish consistent processes that ensure a comprehensive and timely evaluation of GETs and their deployment to identify where these technologies like DLR will significantly benefit customers and improve the network's reliability and affordability. This is a key policy area where standard rules can accelerate DLR deployment, increase grid capacity, and ultimately deliver valuable cost savings for Britons.

My colleagues Garretson Oester (goester@linevisioninc.com) and Eli Asher (easher@linevisioninc.com) are available to engage further with Ofgem, other stakeholders, and the ET providers on this topic. This response is not confidential.

Respectfully yours,

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⁴<https://www.riiot3.nationalgrid.com/document/30069/download>

⁵ <https://www.riiot3.nationalgrid.com/document/30042/download>

⁶<https://www.ssen-transmission.co.uk/globalassets/documents/riio-t3-documents/innovation-strategy.pdf>