

Email to: RIIO3@ofgem.gov.uk

10th February 2025

Dear RIIO-3 Team,

Response to the Call for Evidence on the Electricity Transmission Business Plans for RIIO-3

EDF is the largest low carbon energy generator, as well as the only nuclear generator in the UK. EDF operates low carbon nuclear power stations and has a large and growing portfolio of renewables, including onshore and offshore wind, solar and energy storage. EDF has a large customer base and will be integral to Britain achieving net zero by building a smarter energy future that will support delivery of net zero carbon emissions, including through digital innovations and new customer offerings that encourage the transition to low carbon electric transport and heating.

We welcome the opportunity to respond to this call for evidence.

Transmission investment

From our review, the transmission owners (TOs) business plans set out a broad range of investments in the transmission network that are both ambitious and necessary. We welcome focus from Ofgem on deliverability, and we have used recent engagement with TOs to emphasise the importance of getting those works completed on-time and to budget.

Government's plans for Clean Power 2030 (CP30) are dependent on the TOs delivering their works on time. For example, the NESO's advice to Government in November 2024 stated: *"To meet clean power in an efficient way in 2030, we recommend a total of existing 88 wider transmission schemes that deliver clean power and minimise constraints. **80 must be delivered by 2030 to deliver the clean power metric. 9 of these have already been built**".* We would welcome ongoing reporting and transparency from TOs on the progress of the remaining projects necessary for CP30.

We consider that successful delivery of project encompasses both its physical construction and also its successful energisation and integration into the wider transmission network. We note that there may be challenges with system access as a significant number of transmission and user connection projects come online in the run-up to 2030. We would welcome further scrutiny from Ofgem on the roles of TOs and NESO in facilitating this system access as part of the deliverability assessments.

We look forward to seeing the outcome of Ofgem's assessment of the business plans and needs cases in the draft determinations.

Impact on consumer bills

The nearly £80bn of spending in T3 proposed by the TOs will begin to flow through into consumers bills quickly, and we note TO's own estimates of at least a doubling of the cost of transmission in an average consumer bill. We would welcome greater visibility of the forecast impact on consumer bills to enable suppliers to set competitive retail tariffs for the coming years.

We look forward to continuing to work with Ofgem in the post-consultation stages. Should you wish to discuss any of the issues raised in our response or have any queries, please contact me or Matthew Ball at Matthew.Ball2@edfenergy.com.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'AM Cox'.

Mark Cox
Head of Nuclear and Wholesale Market Policy