

Received 10 February 2025

Dear FWP team

I attach the response prepared by the ESN Pylons team to your call for Forward work Programme consultation.

I would add that the number of call/consultations is high. This in part reflects the National Grid strategy of multiple projects, treated individually with no overarching spatial plan to link them. This enables their obfuscation and Ofgem's "light touch" oversight to disenfranchise those most impacted.

We in this part of East Anglia agree with the need for new infrastructure for green energy and have been trying to communicate with National Grid, Ofgem and government (both regimes) for 3 years, with little result.

If Ofgem provided robust scrutiny of operational and development areas of work, and ensure proper consultation that brought consumers along with plans, there would be less resistance to change – no nimbies or blockers but supporters

Yours

Jane Lushington

Offton & Willisham Team – ESN Pylons

Dear FWP Team

We welcome the opportunity to respond to this consultation and we note that Ofgem is seeking views on whether:

- you are proposing to tackle the right set of problems in the sector
- if anything major is missing, and
- any sense of the relative priorities between different problems.

And we note that Ofgem's strategic priorities are:

1. Shaping a retail market that works for consumers
2. Enabling infrastructure for net zero at pace
3. Establishing an efficient, fair and flexible energy system
4. Advancing decarbonisation through low carbon energy and social schemes
5. Strengthening Ofgem as an organisation.

Our submission is based on our experience in East Anglia of dealing with Ofgem.

We do not believe that Ofgem is addressing the problems in the sector and we believe that the relative priorities are wrong and need to be addressed.

Ofgem has been unwilling to take on board community concerns about the impact that a transmission operator (in this instance, National Grid Electricity Transmission) is having on consumers, communities and the environment.

Consumers and communities (and the environment, which has no-one to speak for it) need Ofgem to require NGET to be transparent, to appraise projects using the Treasury Green Book and to consult on alternatives which are presented to stakeholders on a like-for-like basis.

Instead, we have seen throughout our nearly three year campaign that Ofgem takes at face value proposals submitted by NGET, despite concerns raised by us.

Ofgem has not been acting as a regulator. It has been acting as a facilitating partner to NGET.

This means that consumers will be exposed to higher and higher bills over the years. This is firstly because Ofgem refuses to insist upon cost-saving coordination of infrastructure offshore. The total cost to consumers of this in the North Sea alone, at 2020 costs, is £2billion.

Secondly, because Ofgem refuses to analyse NGET's Norwich to Tilbury pylons submission, it is allowing NGET to progress with a project which does not include huge costs such as biodiversity net gain, community benefits, Green Book compliant contingency and full compensation. This allows NGET to claim that other project costs are seemingly much higher than they are in reality.

Thirdly, nor is Ofgem looking at comparable projects such as Hinkley overhead lines, which show that the N2T project is suspiciously cheap, or Eastern Green Link 3/4 in which NGET state that HVDC underground and sub-sea has lower lifetime costs and will be quicker and less risky to deliver than overhead lines.

Ofgem is failing consumers now and in the future. It is failing to deliver infrastructure fit for the future. It is failing to regulate and instead facilitating a deeply unpopular, expensive and harmful project which will be mired in delay in the courts

We remain, as ever keen to discuss our concerns and to see NGET held to account.