



The Scottish Parliament
Pàrlamaid na h-Alba

Brian Whittle MSP
Member of the Scottish Parliament for South Scotland Region

Ofgem
Network Price Controls
By email – RIIO3@ofgem.gov.uk

CC - Secretary of State for Energy Security and Net Zero
The Rt Hon Ed Miliband MP
By email - Secretary.State@energysecurity.gov.uk

25th August 2025

To whom it may concern,

RE: Ofgem's draft determination implications for SSEN Transmission's and Scotland's sustainability ambitions

I am writing in response to Ofgem's consultation on its Draft Determinations for the RIIO-T3 price control period.

Through discussions with my constituents and other local stakeholders, it has become increasingly clear that initiatives on sustainability and biodiversity to support a low-carbon economy are becoming more and more important to them.

I would urge Ofgem to reconsider any sustainability proposals that would support those aims, including those put forward by SSEN Transmission. SSEN reports that, if their proposals are rejected, it will result in the loss of £70 million of funding designated for vital nature restoration across the north of Scotland and £140m to deliver low carbon construction. This could have a consequential impact on the availability of high-quality nature-based jobs, risk investment, stifle innovation and undermine supply chain confidence.

The climate and nature crises are inextricably linked and any proposed investment in Scotland's electricity transmission network must go hand in hand with efforts to restore Scotland's natural environment. I have found that many communities and individual constituents are interested in any Environmental Impact Assessments and environmental management plans for sites proposed alongside planning applications.

I would encourage Ofgem to ensure that any future funding proposals support a nature positive future for Scotland and meet their own biodiversity duty to align with Scottish Government targets of halting biodiversity loss by 2030 and restoring and regenerating biodiversity by 2045.

The built environment, including construction, accounts for roughly 40% of the UK's carbon emissions, with construction stubbornly hard to decarbonise. Proposals that seek to reduce carbon emissions within the built environment and strengthen low carbon supply chains need to be seriously considered. For example, SSEN's proposed Low Carbon Construction Fund would support

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the wider UK Industrial Strategy, stimulating low-carbon sectors and giving the supply chain confidence to invest in low carbon solutions and innovations. This will create economic growth and unlock jobs in both the construction and energy sectors, whilst cutting the carbon footprint of electricity network expansion.

While I recognise these proposals are undoubtedly ambitious, it appears to me that the public are supportive of greater ambition when it comes to developing and constructing infrastructure of this scale. Failing to adopt best practice nature enhancement risks eroding public trust and support for the construction of vital electricity infrastructure.

I am supportive of SSEN's proposals, and more broadly believe greater efforts should be made to address the climate and nature crises alongside the development of the next generation of energy infrastructure.

I hope Ofgem will take this opportunity to reflect on their current approach and reconsider their position.

Yours sincerely,

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