



Climate-i Ltd  
[climate-i.co](https://climate-i.co)

26th August 2025

To: [RIIO3@ofgem.gov.uk](mailto:RIIO3@ofgem.gov.uk)

## RIIO-3 DRAFT DETERMINATIONS CONSULTATION

Dear Ofgem,

Climate-i is an early-stage start-up developing technology to capture leaks of sulphur hexafluoride (SF<sub>6</sub>) from electricity transmission, distribution and generation facilities. In line with this focus, our response addresses the consultation questions related to TOs' environmental reporting i.e. OVQ2 and ETQ9.

We welcome the fact that all TOs have adopted validated Science Based Targets and are pleased that Ofgem assess TOs' IIG strategies to be "broadly in line with their SBTi targets".

We note that the RIIO-3 Environmental Reporting Guidance will be consulted on more fully following Ofgem's Final Determinations. We would welcome that guidance facilitating TOs to use their AERs to report their use of:

- i. Reclaimed or recycled SF<sub>6</sub> in place of virgin SF<sub>6</sub> gas.
- ii. Novel emissions reduction technologies, such as SF<sub>6</sub> leak capture, should such technologies become available within the RIIO-3 period.

Yours sincerely,

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