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Date: 26 August 2025

**Subject: Response to RIIO-3 Draft Determinations – National Grid Electricity Transmission (NGET)**

Dear Jonathan,

On behalf of the Greater Manchester Combined Authority (GMCA), we welcome the opportunity to respond to Ofgem’s consultation on the RIIO-3 Draft Determinations for National Grid Electricity Transmission (NGET). This proposal aligns directly with the ambitions of the Greater Manchester Strategy 2025–35, which sets out a vision for a thriving city region where everyone can live a good life. Our strategy commits to fixing the foundations of life—shelter, safety, mobility, opportunity, and support—through collaborative, place-based infrastructure delivery.

**1.Support for Regional Infrastructure and Strategic Alignment**

GMCA strongly supports Ofgem’s continued focus on ensuring that the RIIO-3 framework delivers for consumers, communities, and the transition to net zero. The Draft Determinations’ emphasis on innovation, digitalization, and decarbonization aligns with our own regional ambitions. We particularly welcome the recognition of key North West projects, including the Middleton 400kV substation, Feckenham–Ironbridge OHL, and interventions affecting the Carrington corridor.

The North West’s energy needs are significant and growing, driven by population, industrial demand, and our net zero commitments. The proposed investments in substation upgrades, overhead line reconductoring, and enhanced asset health are critical for supporting growth, resilience, and decarbonization in Greater Manchester and beyond.

**2. Regional Coordination and Whole-System Planning**

We welcome NGET’s commitment to whole-system planning and stakeholder engagement, as outlined in the North West Regional T3 Presentation and the NGET Business Plan which was presented to the Greater Manchester Strategic Infrastructure Board (SIB) a few months ago. The collaborative approach to developing Future

Network Blueprints and aligning with local distribution networks (DNOs) is essential for delivering efficient, timely, and coordinated infrastructure upgrades.

GMCA is actively working with regional partners—including the NESO, United Utilities, SP ENW, and Transport for Greater Manchester—to align infrastructure investment pipelines and support the delivery of the 10-Year Growth Plan. We urge Ofgem and NGET to continue to prioritise regional coordination, data sharing, and early engagement with local authorities to maximise the benefits of RIIO-3 investments.

### 3. Key Issues and Areas for Clarification

While we support the overall direction of the Draft Determinations, we wish to highlight several areas where further clarity or action is needed:

- **Optioneering and Justification:** Ofgem’s assessment notes that some interventions (e.g., Middleton substation, Ironbridge upgrades) require clearer justification and a wider range of options, including consideration of alternative technologies and routes. We encourage NGET to provide additional detail on long-term strategies and to work with regional stakeholders to ensure that investment decisions are robust, resilient and future-proofed.
- **Asset Health and Investment Triggers:** The consultation identifies a need for greater transparency around asset health triggers and the rationale for replacing or refurbishing assets. We support Ofgem’s call for NGET to provide more granular data and to align asset interventions with regional growth and decarbonisation priorities. Furthermore, we urge Ofgem to encourage NGET to strengthen investment in continuous condition monitoring of their transmission equipment particularly in high consequence failure locations, consistent with the recent NESO investigation into the North Hyde incident involving Heathrow Airport.
- **Uncertainty Management:** Several projects are flagged as “partially justified” due to unclear triggers or lack of optioneering. We recommend that Ofgem and NGET work with regional partners to manage delivery risks and ensure that funding mechanisms are flexible enough to respond to changing needs.
- **Community and Environmental Benefits:** We welcome the commitments to biodiversity net gain, carbon reduction, and community benefit schemes. It is important that these are delivered in partnership with local authorities and tailored to the needs of host communities.
- **Engagement:** We urge Ofgem and NGET to continue engaging with GMCA and other regional stakeholders as the Final Determinations are developed, particularly on projects directly affecting Greater Manchester (e.g., Carrington, Rochdale, Trafford, South Manchester).

- **Alignment with Local Plans:** We recommend that RII0-3 investments are closely aligned with local development frameworks, energy strategies, and transport electrification plans.
- **Monitoring and Reporting:** We support Ofgem’s proposals for annual reporting on Price Control Deliverables (PCDs) and Output Delivery Incentives (ODIs), and request that regional data is made available to support local monitoring and evaluation.
- **Flexibility:** Given the pace of change in the energy sector, we support the inclusion of uncertainty mechanisms and reopeners to allow for adjustments as new information emerges.

## 5. Conclusion

We welcome the direction of the RII0-3 Draft Determinations and the recognition of the North West’s strategic importance. We have a strong and reliable track record of delivery in Greater Manchester, representing the largest economic area in the UK outside of London. We look forward to working with Ofgem, NGET, and regional partners to ensure that the final framework delivers resilient, future-proofed infrastructure that supports inclusive growth, net zero, and community benefit in Greater Manchester and the wider region.

We would welcome the opportunity to discuss these points further and to contribute to the development of the implementation framework ahead of the Final Determination.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Caroline Simpson', with a small dot at the end.

**Caroline Simpson**

Group Chief Executive

GMCA, GMFRS & TfGM

**Peter Emery**

Chair Greater Manchester Strategic Infrastructure Board