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OfGem
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To whom it may concern,

Enquiry Re : Ofgem's draft determination implications for SSEN Transmission's sustainability ambitions

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

The period running from 2026 – 2031 comes at a critical juncture in Scotland's transition to a cleaner, more secure and more affordable energy system, enabling the north of Scotland's pathway to Clean Power 2030 and unlocking high quality, skilled jobs.

I understand that SSEN Transmission's sustainability proposals which, if rejected, 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. I also understand that this could have a consequential impact on high quality, nature-based jobs, risk investment, stifle innovation and undermine supply chain confidence.

The climate and nature crises are inextricably linked and SSEN Transmission's proposed investment in Scotland's electricity transmission network aims to go hand in hand with restoring Scotland's natural environment.

Ofgem's current funding proposal does not support a nature positive future for Scotland, nor does it meet its own biodiversity duty to align with Scottish Government targets of halting biodiversity loss by 2030 and restoring and regenerating biodiversity by 2045.

I understand that SSEN's proposed Low Carbon Construction Fund would support 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 SSEN Transmission's proposals are undoubtedly ambitious, they meet public expectations when it comes to developing and constructing infrastructure of this scale. Not delivering best practice nature enhancement risks eroding public trust and support for vital electricity infrastructure delivery.

I would urge Ofgem to re-evaluate their position on this matter.

Yours sincerely,

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