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25 August 2025

**Joint WLB/WLA Response to RIIO-3 Draft Determinations for the Electricity Transmission,
Gas Distribution and Gas Transmission sectors**

We the undersigned are collectively writing this Draft Determination response as a coalition between the [West London Alliance](#) (WLA), a partnership between West London local authorities and [West London Business](#) (WLB), a business leadership forum that works to maintain the area's global economic competitiveness, whilst catalysing action for people and planet. WLA and WLB have worked in close collaboration on shared interests for over twenty years – one of the longest running partnerships of its kind in the country.

West London is a £70bn economy – bigger than the cities of Birmingham and Manchester combined – and is an emerging leader in sustainability and clean technologies that will help deliver the government's Clean Power 2030 Action Plan. With ambitious targets for residential and commercial growth, it is home to Park Royal – London's largest industrial and business location – and Heathrow Airport, the UK's largest single employment site. West London is at the confluence of other major transport infrastructure such as HS2's Old Oak Common station and the West London Orbital, as well as a high concentration of energy-intensive industries such as manufacturers, logistics, data centres and engineering firms that are critical to the UK economy. Perhaps unsurprisingly, therefore, West London's electricity networks urgently need substantial reinforcement to meet growth and decarbonisation targets.

We welcome the more open and transparent dialogues we have had with Ofgem and National Grid representatives through 2024/25 – and are pleased that representatives of both the regulator and TNO will be present to meet with West London Corporate and Council Leaders on Wednesday 10 September when they meet in Wembley to review progress on energy supply constraints in the sub-region. In September WLA/ WLB are also meeting with Office for Investment and DESNZ colleagues, alongside West London industry representatives, to discuss the need to address energy supply constraints urgently, and will be happy to update Ofgem on these discussions where relevant. We welcome and note that you have advised local MPs in recent correspondence that *"The challenges in obtaining timely connections to the network, particularly in areas like West London, remain a key strategic priority for Ofgem."*

We continue to support open information exchange and the incorporation of data from the [West London Local Area Energy Plan \(LAEP\)](#) into transmission and distribution network demand

forecasts. To this end we have now commissioned ARUP to dissect the LAEP demand forecast by GSP area. Most of our boroughs are also in varying stages of developing their Phase 2 LAEP reports; London Borough of Hounslow published their [Phase 2 LAEP report](#) earlier this month.

As Ofgem finalises the National Grid RIIO-3 Draft Determinations, we would stress the following ongoing concerns:

- **Pace of investment** – In your responses to West London MPs' recent queries you note: *"This [next] set of investments will increase the capacity of the existing 'western ring' and enable the connection of a tranche of contracted customers."* I.e. the next wave of new supply is booked. National Grid responses to West London MPs queries on the RIIO-3 business plan state: *"we are currently conducting a review of our network strategy for West London... to ensure that we are making the appropriate investments on the right timescales to meet West London's needs."* We hope this network strategy review will complete in time to further positively influence the final draft of National Grid's RIIO-3 business plan and ask you to encourage this.
- **The lack of synchronicity between planning/ review cycles** – Your responses to West London MPs also state: *"wider industry processes (including through NESO's strategic planning updates and reform of the connections arrangements) will review capacity, connection points and timelines across the region. This later process is expected to conclude in March 2026."* The length of time this process is taking means that there may be insights/ conclusions reached that have bearings on the National Grid plans for West London. If this is the case are we right in assuming that this may also demand require reopeners to the RIIO-3 business plan?
- **The need for Ofgem and wider stakeholder clarity on West London transmission supply / network funding gap** – We have an outstanding request for National Grid to share any modelling they have undertaken to ascertain the cumulative additional electricity supply that will reach constrained GSP areas as a result of the T3 and T4 project pipeline, and timing. Without this it seems impossible for Ofgem, NESO and West London stakeholders to ascertain whether the scale of the investments proposed are sufficient and consumer needs will be served. This is also vital insight to ensure the DNO investment plans are aligned.
- **West London GSP capacity split between TNO and DNO** – We are observing Data centres either having to run stretch cables from the UKPN DNO area into the SSSEN geography or connect directly into the transmission network. Given how National Grid split GSP capacity (and headroom) between DNOs and other direct customers we would welcome Ofgem getting the industry to develop a simple dashboarding tool for local stakeholders to review and monitor this.
- **Resilience** – The North Hyde GSP fire and subsequent reports highlight the critical importance of National Grid and Ofgem ensuring that there is a robust maintenance regime for network assets, alongside the growth programme.



Since 2021 West London stakeholders have been building the evidence-base for substantial growth in electricity demand over the next decade. We are now living with the consequences of a lack of required electricity supply contributing to a slowdown in our economic growth and productivity. West London provides an ideal testbed for whether Ofgem's current reforms to enable more strategic, anticipatory investment, can deliver the results West London consumers need – and for you to ensure that National Grid rises to both the challenge and opportunity.

Yours sincerely,

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