
RIO-3 Draft Determinations Summary of Responses

We received 152 responses to the RIO-3 Draft Determinations consultation. This document sets out the responses that came in via email. Where respondents provided separate documents, these are published alongside this document. Responses where explicitly marked as confidential, have been excluded.

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Action to Protect Rural Scotland (APRS)

Please find below the APRS response to this consultation: RIIO-3 Draft Determinations for the Electricity Transmission, Gas Distribution and Gas Transmission sectors

APRS, Action to Protect Rural Scotland, is Scotland's Countryside Charity. We campaign to protect, enhance and promote Scotland's countryside and rural landscapes for everyone's benefit, and we support others to do the same. www.aprs.scot

Our Response to the Consultation

With over half (£4.7bn) of the proposed investment into GB's high-voltage electricity network allocated to Scotland (via SSEN and Scottish Power), and an overall ambition to deliver 3,500km of new circuits, we are concerned about the impact this will have on Scotland's communities, landscapes, and biodiversity. We appreciate the urgent need to modernise and build grid capacity in the transition to renewable energy, however this shift is happening without **adequate, holistic strategic planning that considers** the long-term impacts on landscapes, communities, and the environment. **It is crucial that we address the twin crises of biodiversity loss and climate change, ensuring that one is not expedited at the expense of the other.**

Energy infrastructure planning, including this proposed grid expansion, should be strategic and landscape-sensitive, ensuring that developments are proportionate, suitably located to minimise impact, and deliver lasting benefits to communities and the environment. Wherever possible, in areas of high landscape value, transmission infrastructure should be located underground, and we would like to see sufficient funding ring-fenced for undergrounding in national parks, national scenic areas (NSAs) and local landscape areas, to protect the value of these areas. This could be achieved through the continuation and expansion of [VISTA](#) (Visual Impact of Scottish Transmission Asset), fully funded by Ofgem into the RIIO-3 price control period.

We would also like to see renewed commitments from SSEN and Scottish Power to appropriately and fully engage with communities in affected areas to ensure their needs, and the needs of the local environment, are protected. We ask for Community Benefit Funds (e.g. [SSEN's CBF](#)) for all areas of transmission infrastructure at an adequate level to ensure that communities in Scotland hosting any new transmission infrastructure will benefit from the transition to renewable energy. Network operators and developers must

balance development with landscape protection, biodiversity recovery, community benefit, and long-term resilience to ensure a just and sustainable transition for Scotland.

APRS, July 2025

The Social Brokers

To whom It may concern,

In answer to the question- GDQ11. Do you agree with our proposed design of the VCMA UIOLI mechanism?)

This is our response:

The VCMA funding has had a profound impact on the communities we serve in North Liverpool, particularly in Kirkdale, one of the most deprived areas in the region. "We see the rise in poverty as a whole and the rising cost of living crisis, so any increase would have been welcome. However, the help provided has lifted the community up and given opportunities to help those in the most deprived area in North Liverpool."

The funding has enabled us to address critical issues such as fuel poverty, which continues to rise. In 2024, 36.3% of households were required to spend more than 10% of their income on domestic energy, and projections for 2025 indicate an increase to 11.2%. The provision of CO monitors has been particularly impactful. "We also feel the CO monitors helped us get over the threshold of the most vulnerable families."

"The VCMA has provided the space and funding to put money back into the residents of the most vulnerable people in North Liverpool. Using income maximisation and debt relief, we have put back over half a million pounds cash in 12 months back into the pockets of the community residents." This financial relief has not only alleviated immediate pressures but also created opportunities for long-term change.

"This also has given us the opportunity to have conversations around not being reliant on the state benefits and allowed us to upskill and fund part-time and full-time jobs in our local community for those furthest from the jobs market." By addressing both immediate needs and systemic challenges, the funding has empowered individuals and families to build a more sustainable future and allowed us to get over the threshold of those families that normally would have shut the door firmly to anyone who knocked.

While the current funding level has been instrumental in delivering these outcomes, any increase would have been welcome to further expand the reach and impact of these initiatives. The VCMA's support has been a lifeline for the most vulnerable residents, enabling us to deliver meaningful change and create opportunities for those who need it most.

If you would like any more information or feedback, please don't hesitate to contact us.

We thank you all.

Regards & Respect

Paul Walmley

Alan Roseweir

Response to Ofgem RIIO - T3 Draft Determination

My response is with reference to SPTQ1

Introduction

My name is Alan Roseweir I am responding in the capacity as Chair of The Fort Seafield and Wallacetown Community Association (SCIO) Registration Number SC05118 and as Project Lead for the Wallacetown Community Energy Project. This Project was partly funded by RIIO – T2 Net Zero fund.

To provide a bit more context and detail about our ambitious project, (4 years in development) I have attached a copy of a draft information leaflet that will give you an insight into our project. I should note that this project goes live this week.

The reason I have highlighted the 4 year timescale is specifically important in relation to the question. In the attached information leaflet you will have seen that we were able to secure, from another source funding to complete our feasibility studied. We then persevered with CARES to secure the capital Funding for the Project. Unfortunately the criteria (2021 -2024) set out for funding allocation did not align with our project. It was only when RIIO – T2 Net Zero funds became available we were able to accelerate and deliverer what is a bold an ambitious Project. I should point out that when we were preparing our bid CARES changed the scope of what projects were fundable, I pleased to report ours met the criterial. It is all important to state that a condition of the Net Zero funding was the match element. Therefore we were able to secure the full grant funding for this Community Project.

RIIO – T2 Net Zero fund provided the majority of this funding (2/3).

This is a 25 year partnership project with South Ayrshire Council.

If Ofgem decide to remove opportunities to access funding like this you will starve Communities, not just the funding but the opportunity to drive hope and determination for communities now and in the future. In our case Wallacetown one of the most deprived areas in Scotland where people want to leave not live. This, our project will help to change to be a place where people want to live not leave. The ambition being making Wallacetown a 'Net Zero Village'. Ofgem would want to be associated with projects like this.

So I would ask to think long and hard about cutting this lifeline to the future off. Without a doubt we would not be sitting with a live project today and the buzz and excitement this is generating. To that end we are producing a video that will tell the full story from concept- birth – delivery which we will openly share with all.

Happy to be contacted if required.

Kindest regards

Alan Roseweir Chair Fort Seafeld and Wallacetown Community Association and Project Lead for Wallacetown Community Energy Project

Shelter

Hello,

On behalf of Shelter, the national campaign for homeless people ltd, I am submitting a response to the VCMA draft determination released on 1st July 2025.

As an organisation we have seen huge positive benefits from receiving funding from VCMA in 2025. We have been able to fund some of our core but increasingly vital frontline services and offer training to staff to upskill them around CO awareness and the PSR. This amount of money has been transformational and has shone a light on fuel poverty and how this is part of the wider picture of economic instability that can lead to homelessness. We have never before had access to such a focus on energy despite it being an incredibly important part of home which is a direct area of ours. The VCMA funding in 2025 has opened conversations across the organisation about fuel poverty and what more we can be doing to support our service users. It has also led to key improvements in how we record certain aspects of our support and interactions with clients. The housing emergency is getting worse not better, as demonstrated by the July release of statutory homelessness statistics. It's vital that we can access funding such as this which allows us to plan for the long term and support some of the most vulnerable people in society.

We were delighted to see the proposed funding level for RIIIO-3 to be at a similar level to RIIIO-2. Unfortunately, fuel poverty and safe housing is getting worse, not better so it is vital funds are available to continue the work we have started and retain staffing and other resourcing levels in our organisation. We have poured a huge amount of internal resource into our 2025 contract so are delighted to see this work can continue and will have longer term benefits. We have realised through the last year where we have needed to make infrastructural changes at Shelter to ensure we can fulfil the reporting requirements for this contract and so that has been a key learning which we will ensure we seek to fund adequately when applying for funds in RIIIO-3. Whilst the level of funding announced is great to see, it is key to ensure that is not restricted any further and the terms of receiving funding can be left to partner organisations to determine their most impactful use. A suggested build and important shift would be for any assessment of impact to include a more holistic view of a client's journey with a charity. As Shelter is not a solely energy-based charity, the way we support our service users is to view a person's situation in the whole. The VCMA funding has led us to focus in on advice

around energy but this forms part of a wider conversation looking at a person's current housing situation. It is hard for us to talk about impact in an isolated way – we need to share the full picture to really demonstrate the value we are having and how funding is changing lives for the better.

It will be crucial for the RIIO-3 funding to be available in a multiyear format. Huge amounts of time are poured into funding applications and so it increases efficiency to enable organisations to apply for multiyear funds. The other benefits of multiyear funding include retaining staff talent through job security, securing greater levels of internal buy in, the ability to make changes and improvements over time through learnings in early stages.

Many thanks,

Annie

Evolve Nottingham

Impact of VCMA on Evolve Nottingham's Community Work

As an organisation serving one of the most deprived communities in Nottingham, the VCMA funding has been transformational for our ability to address fuel poverty through our warm hub initiative. Our warm hub serves as a vital community resource, welcoming 2,100 unique individuals each month and creating a comprehensive support network that extends far beyond basic warmth provision.

Direct Community Impact

The warm hub has become a cornerstone for energy education and safety awareness in our community. Through our programmes, residents gain practical knowledge about energy-saving techniques that can immediately reduce their household bills. We provide crucial education about carbon monoxide safety, potentially saving lives in our community where older housing stock and inadequate heating systems create heightened risks. Perhaps most importantly, the hub has fostered a network of informed community members who actively share energy-saving tips and safety information with their neighbours, creating a multiplier effect that extends our reach throughout the area.

Place-Based Approach to Fuel Poverty

Our strategic partnerships with local schools and foodbanks have enabled us to develop a truly place-based response to fuel poverty. This collaborative approach ensures that families facing energy hardship can access wraparound support, from emergency food assistance to energy advice, all coordinated through trusted local institutions. By working directly within our community rather than requiring residents to travel to distant support centres, we've been able to reach those most in need of assistance.

Funding Appropriateness

Given the stark reality that fuel poverty continues to escalate nationally, with current data showing 36.3% of households spending more than 10% of their income on energy and projections indicating this will worsen to 11.2% in 2025, we believe the current VCMA funding level is appropriate as a foundation but could justifiably be increased. The scale of need in our deprived community, combined with our proven ability to reach 2,100 unique individuals monthly, demonstrates that additional investment would yield proportional increases in community impact.

The rising tide of fuel poverty, as documented by National Energy Action, means that organisations like ours operating in the most disadvantaged areas require sustained and potentially enhanced funding to maintain our vital community support networks. Our warm hub model has proven effective at creating lasting change through education,

safety awareness, and community connection, but increased funding would allow us to expand these services to meet growing demand whilst maintaining the quality and personal approach that makes our work so effective.

Thanks

Director of operations

Evolve Nottingham CIC

North Warwickshire Citizens Advice

Dear Team

I would like to make the following observations based on the report and being a customer who is funded by a gas distributor network provider:-

- I understand that the funding level provided is similar but due to the timescale, the amount has to last longer. More people are in crisis, is this acceptable?
- The impact the funding has had on our clients is enormous. Literally lives have been changed for the better. Financial gains through our help have been moving towards 2 million pounds. Children that were affected by fuel poverty, are now through help provided to their parents, having a better start in life.
- More help is needed, not less if possible.
- It is projected that fuel poverty will increase by 10% plus in 2025, is enough being done?

Best Regards

Lorraine

Carents

RIIO-3 Draft determinations - Consultation response to GDQ11 by Carents®

Carents® warmly welcomes the proposals re the VCMA UIOLI mechanism. We believe they provide a crucial framework for enabling targeted support for vulnerable groups across the UK. We strongly support the enhanced funding levels but recommend these should be increased further to meet the rising demand we anticipate over the next five years.

Our collaboration with Cadent and NGN, initiated in late 2022, exemplifies the transformative power of VCMA investment. Through this partnership, we have developed and scaled an innovative support service which fills a recognised gap in support for older adults and their unpaid family carers whom we call "carents". These carents make up 57% of all unpaid carers in the UK and play a vital yet often invisible role in helping ageing loved ones remain safe, warm, and well at home.

Carents are a hidden backbone of our health and social care ecosystem. Despite delivering over £100 billion in unpaid care annually, they are frequently underserved, operating at the margins of public support. Many face significant financial hardship, emotional strain, and a heightened risk of fuel poverty, challenges which VCMA funding has helped us address head-on.

Thanks to VCMA support and the backing of the GDNs and other key stakeholders, we have been able to launch and grow an accessible, free 24/7 digital-first service tailored to carents' needs. We have a highly engaged community of over 50,000 carents which has grown 10 fold in the last 14 months (all vulnerable), many referred to us by GP practices across the UK, enabling Carents® to support a further 50-100000 'hard to reach' older adults. On a daily basis we provide resources to many more via our website which to date has reached over 1 million unique visitors. Our work bridges critical gaps in support, improving access to services, benefits, energy-saving schemes, and practical tools that help care-affected households remain resilient.

While VCMA funding is often viewed through a financial lens, we urge OFGEM to also consider its deep human impact. Our users describe Carents® as a "lifeline," a "godsend," or even the "fourth emergency service." For those facing exclusion, isolation, and crisis, our service delivers life-changing support. Whether it's navigating the Priority

Services Register, accessing carbon monoxide awareness resources, or unlocking energy efficiency grants, our integrated approach relieves pressure on public services and unlocks vital funds and resources for vulnerable households.

Our approach means that we can deliver social value at scale. Through our VCMA-backed work, we have generated meaningful synergies for the energy system and frontline services while improving outcomes for some of the UK's most at-risk communities.

We also recognise that similar impact is being achieved across other underserved groups through VCMA-funded initiatives. A reduction in funding would risk stalling or reversing this progress, particularly at a time when need is rapidly increasing. We therefore support the continuation and refinement of the VCMA UIOLI mechanism. However, we believe the proposed funding level should be increased due to rising demand.

Over the next five years, the UK will face growing challenges at the intersection of ageing, informal care, fuel poverty, and the energy transition. The number of people aged 65 or more will grow, a demographic shift which will be accompanied by rising levels of frailty, chronic illness, and mobility issues. These challenges will intensify household vulnerability to cold, energy insecurity, and service disruption.

Many older people live in hard-to-heat homes with poor insulation. Their family carers—often balancing employment with care—are struggling with financial pressures and energy-related stress. These households typically have higher energy needs but less capacity to absorb cost increases, access retrofit schemes, or navigate energy assistance programs.

In this context, fuel poverty transcends affordability. It encompasses unsafe indoor temperatures, lack of access to low-carbon heating, and heightened risk from power disruptions, especially for individuals dependent on medical equipment or home-based care. As informal care increasingly shifts into domestic settings, energy insecurity becomes a direct threat to health, wellbeing, and the sustainability of care arrangements.

Without a substantial uplift in VCMA funding, many of these households will be left behind. Investment is urgently needed to expand and embed trusted, targeted support that meets the real-world needs of older adults and carers. Prioritising inclusive, barrier-free interventions will empower care-affected households to engage safely and equitably with the energy system.

The VCMA has already demonstrated its power to deliver real, measurable impact in communities like ours but the work is far from done. With an ageing population, increasing energy complexity, rising fuel poverty and deepening inequality, a higher level of funding is essential. Only then can we safeguard the health, dignity, and energy security of the millions of households that are silently shouldering the burden of ageing, vulnerability and care in our communities.

We thank OFGEM for the opportunity to contribute to this consultation and remain committed to supporting a fairer, more resilient energy future for all.

Yours faithfully

Jackie Gray

Member of the Scottish Parliament for East Lothian Constituency

Subject - 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 RIIIO-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 would urge Ofgem to reconsider 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. 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 must 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.

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 agreed with SSEN Transmission's approach and would urge Ofgem to think again

Paul McLennan

MSP Maurice Golden

To whom it may concern:

Ofgem's consultation on its Draft Determinations for the RIIIO-T3 price control period is welcome.

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 would urge Ofgem to designate funding as part of this process for vital nature restoration and deliver low carbon construction. This will be critically important in establishing high quality, nature-based jobs as well as building the supply chain.

The climate and nature crises are inextricably linked and investment in Scotland's electricity transmission network must go hand in hand with restoring Scotland's natural environment.

Ofgem's current funding proposal represents a risk to establishing 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 would urge Ofgem to think again regarding these proposals.

Regards,

Maurice

Home-Start UK

Please find below our response to consultation question GDQ11 regarding the proposed design of the VCMA UIOLI mechanism, submitted from the perspective of [Home-Start UK](#), a charity stakeholder working directly with vulnerable families.

As a charity supporting families with young children who are disproportionately affected by rising energy costs and the growing threat of fuel poverty, we welcome Ofgem's continued commitment to the VCMA and value its recognition of the ongoing risks faced by these vulnerable households.

We strongly support the decision to retain the VCMA as a UIOLI allowance in RIIO-GD3. The flexibility it offers has allowed charities like ours to respond rapidly to the needs of the families that our local Home-Starts meet all year.

We welcome the proposed funding of £165 million which aligns closely with the GDN's business plan proposals. We urge Ofgem to:

- Maintain or increase this level of funding in future reviews, given the projected **rise in fuel poverty to 11.2% in 2025**
- Consider that in 2024, **36.3% of households** were spending over 10% of income on energy which are local volunteers are seeing among many of the families they work with.

The VCMA projects we run with our local Home-Starts across the Cadent and SGN regions allow our volunteers to:

- Deliver carbon monoxide safety education in home and group settings
- Provide free CO alarms for families who do not own one or understand their importance
- Offer energy advice and safeguarding support with tailored local needs and referral to organisations who can add enhanced support to the initial volunteer assessment.

"The majority of the families we support struggle financially, and the majority do not own their homes. Being able to provide support with debt advice, energy saving tips, mould and damp advice, and CO monitors gives our staff and volunteers the ability to help practically, not just emotionally. It makes all the difference to come with a CO alarm and some printed information and say, 'here's another thing we can do to help.'"
Family Support Worker, Home-Start Epsom, Ewell and Banstead.

We appreciate the opportunity to contribute to this important consultation and welcome any further engagement to help shape the final determinations.

Kind regards

Helen Curtis

MP Kirsty Blackman

Good morning,

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.

As an elected member within SSEN's operating region I recognise the importance of ensuring that any investment into our electricity transmission network goes hand in hand with restoring Scotland's natural environment and minimising carbon emissions. I believe that is also the expectation of the wider public.

On that basis, I would be grateful if Ofgem might reconsider SSEN Transmission's sustainability proposals. As I understand it, the rejection of these proposals risks resulting 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 high quality, nature-based jobs, risk investment and undermine supply chain confidence.

Indeed, Ofgem's own biodiversity duty commits to align with Scottish Government targets of halting biodiversity loss by 2030 and restoring and regenerating biodiversity by 2045. In order to achieve this, it is important that funding allocations facilitate best-practice in sustainable investment and network expansion.

As I say, I think these expectations align with those of the public and that SSEN is justified in raising concerns that failing to deliver best practice nature enhancement when constructing infrastructure of this scale will erode public trust in and support for the delivery of vital electricity infrastructure.

Given these considerations, I would be grateful if Ofgem might undertake to review their position on SSEN Transmission's sustainability proposals as set out in the Draft Determinations for the RIIO-T3 price control period.

I look forward to your reply.

Kind regards, Liam

Cloudberry Communities CIC

Hi there

As the organiser of a community project previously funded by the Net Zero fund I want to respond to the draft determination and outline my opposition to this vital source of funding for community projects being replaced with just support. I am happy for my response to be published.

I am responding to

SPTQ1 in the RIIIO-T3 Draft Determinations – SPT. 5.

Those who do not work at the forefront of community services are unlikely to see the absolute crisis our sector currently struggles to operate in. We are overwhelmed with support networks which suck energy from our activists and volunteers - who need funding (alongside support) to deliver community led projects. The latest raft of funds for climate action are all going to intermediary bodies to employ new unneeded staff to trickle down tiny funding amounts to communities, extracting their lived experience and skills, in order to grow their own bureaucracies - enough is enough - the net zero fund and its ability to deliver projects based on grassroots community needs is vital, it listens, it advises, it funds and it continues to support through networking grantees. It matches need to solution which is how we take communities with us on a journey to net zero, The scale of change we need on the climate emergency cannot be reached without grassroots needs based action, which is what this funding has achieved time and time again.

I concur with the assessment that the fund should not be open to those communities who are able to access the new community benefits offering.

Best Wishes

Claire Williams - Cloudberry Communities CIC

Fazakerley Community Federation

The VCMA is essential in enhancing our community's wellbeing by recognising the importance of grassroots organisations like the Fazakerley Community Federation. Our organisation is deeply rooted in the community and trusted by local residents. Many individuals benefit from our services, including welfare benefits, debt advice, the community pantry, warm hubs, and wellbeing activities, often facing complex challenges such as poor mental health. With the VCMA's support, we have been able to continue providing person-centred services that are culturally sensitive, inclusive, and grounded in the lived experiences of those we serve.

Any problem please let me know

Thanks

Colette

MSP Kevin Stewart

To Whom it May Concern,

Subject - 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 would urge Ofgem to reconsider 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. 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 must 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.

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 agreed with SSEN Transmission's approach and would urge Ofgem to think again.

Kind regards,

Kevin

Gordon McGlone

To whom it should concern.

Further to your consultation papers I wish to register extreme dismay at the likelihood of Ofgem refusing accept proposals for significant Biodiversity Net Gain at minimal cost to consumers. I write as a pensioner who finds fuel bills difficult however I am finding the biodiversity and climate change crises, which are happening in plain view, far more worrying. We face interlinked existential threats and as a society must take every effort to ensure that major industries and their associated infrastructures contribute solutions to these growing global / local problems. When major utility companies have the vision, capacity and organisational capacity to further biodiversity net gain it is the duty of you the regulator to seize the opportunity. Small minded jobsworth attitudes will do no more than help the Titanic of State head remorselessly onto the iceberg.

Please shown vision and leadership.

Yours Sincerely

Dr Gordon McGlone OBE MBA PhD BSc

MSP Audrey Nicoll

Good morning

I am a member of the Scottish Parliament for the north-east constituency of Aberdeen South and North Kincardine.

I am writing in response to Ofgem's consultation on its Draft Determinations for the RIIIO-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 affordable energy system, enabling the north of Scotland's pathway to Clean Power 2030 and unlocking high quality, skilled jobs.

Scotland boasts a unique and diverse land and marine environment. In recognition of its importance to biodiversity, well-being and our economy, a range of important legislation, policy and regulation exists to protect our landscapes, coastal and marine areas, freshwater habitats and mountain and moorland ecosystems.

I therefore write to urge Ofgem in the strongest possible terms, to reconsider SSEN Transmission's sustainability proposals which, if rejected, will result in the loss of £70 million of important funding designated for vital nature restoration across the north of Scotland and £140m to deliver low carbon construction.

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

Ofgem's current funding proposal simply 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.

With regard to SSEN's proposed Low Carbon Construction Fund, given the close alignment of this fund to the wider UK Industrial Strategy, I am extremely disappointed it has not been supported as part of the Draft Determination. This fund would enhance supply chain confidence to invest in low carbon solutions, unlocking 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. As you will know public trust is an essential ingredient for sustainable economic growth, well-being and importantly the delivery of sustainable energy for consumers.

I agreed with SSEN Transmission's approach and would urge Ofgem to think again.

Finally, I would be delighted to host Ofgem representatives in my constituency at any time to see some of our natural environment first hand and engage in a conversation with me regarding our sustainability ambitions in Scotland. Please don't hesitate to contact my office should you wish to do so.

Kind regards

Audrey

Alex Petter

In response to RII0-3 Draft Determinations:

- We need renewable energy infrastructure to decarbonise our energy system. We also need to restore nature to mitigate & adapt to climate change. National Grid's proposals help meet the government targets to deliver nature & climate commitments together
- As a public body, Ofgem should press for green ambition (which is of course a government aim), rather than bargain operators down to their minimum legislative requirements
- Ofgem's draft determinations would mean £millions missed investment in nature, but make scant difference to energy bills
- I encourage Ofgem to rethink its approach to funding biodiversity outputs in the next price control period.

With thanks,

Alex Petter

Parisa Danvers

Dear Sirs

Then National Grid has submitted plans showing joined up thinking and respecting the ethos and purpose of the green energy transition by planning to invest in biodiversity above and beyond pure legal requirements, including projects that may not necessarily require planning permission.

Ofcourse we need as much renewable energy infrastructure to carbonize our energy systems and beat climate changes we can, but we also need to restore nature to mitigate and adapt to climate change.

Happily, the National Grids proposals help to meet Mr. Miliband's promise joined up thinking around nature and climate commitments. Dealing with them both together, in an authentic and sensible way.

If a siloed and short-sighted approach is taken by ofgem to the National Grid's proposals, it will mean millions of pounds that could have been invested in nature, but are not, without any positive outcome to show for the mis-step eg tangibly and noticably reducing energy bills

From now, I'm going forward, the UK must have and will have significant critical infrastructure investment via those responsible for our energy and water networks. It is key that such investment is joined up in its approach and is respectful and boosting of nature and nature-based climate adaptation and solutions, as well as reducing our emissions from fossil fuels and our loss of water overall.

I am writing in to express my support for the National Grid's proposals to significantly invest in biodiversity net gain at its sites and projects, beyond pure and minimal legal requirement.

I look forward to hearing the conclusion of this consultation and hope very much that it will keep in mind that while we reduce our emissions, and seek to make Britain more independent and more equitable in its provision of energy to its people, we must also acknowledge and act upon the reality that without the natural world, human beings cannot exist. The National Grid has recognized its responsibility to take action on multiple levels and I hope you will respect and support such joined up thinking.

Kind regards

Parisa Wright

Alister Scott

Consultation response:

National Grid submitted plans to invest in biodiversity above and beyond biodiversity net gain in its infrastructure programme, including many projects that don't need planning permission.

Apparently Ofgem plans to say no.

I am writing to ask you to reconsider.

As we build the large amounts of renewable energy infrastructure to decarbonise our energy system and beat climate change we can also restore nature. National Grid's proposals help meet the current government's promise to deliver nature & climate commitments together.

Ofgem's letter-of-the-law response would mean £millions missed investment in nature, but make scant difference to energy bills.

Please try to think and act a little systemically.

With thanks,

Alister

Luci Isaacson

To whom it may concern,

National Grid submitted plans to invest in biodiversity above and beyond biodiversity net gain in its infrastructure programme, including many projects that don't need planning permission.

I understand from a significant trusted person and colleague, that Ofgem plans to say no.

<https://www.ofgem.gov.uk/consultation/riio-3-draft-determinations-electricity-transmission-gas-distribution-and-gas-transmission-sectors>

Please reconsider.

We need *lots* of renewable energy infrastructure to decarbonise our energy system and beat climate change. We also need to restore nature to mitigate & adapt to climate change. National Grid's proposals help meet Mr Miliband's promise to deliver nature & climate commitments together.

Ofgem's letter-of-the-law response would mean £millions missed investment in nature, but make scant difference to energy bills.

The UK is in the foothills of massive infrastructure investment, from critical sectors like energy and water. We mustn't do it at the expense of our Critical Natural Infrastructure.

Kind regards,

Luci Isaacson BEM BSc MSc

Leon Burdett

To whom it may concern,

National Grid submitted plans to invest in biodiversity above and beyond biodiversity net gain in its infrastructure programme, including many projects that don't need planning permission.

I understand Ofgem plans to say no.

<https://www.ofgem.gov.uk/consultation/riio-3-draft-determinations-electricity-transmission-gas-distribution-and-gas-transmission-sectors>

Please reconsider.

We need *lots* of renewable energy infrastructure to decarbonise our energy system and beat climate change. We also need to restore nature to mitigate & adapt to climate change. National Grid's proposals help meet Mr Miliband's promise to deliver nature & climate commitments together.

Ofgem's letter-of-the-law response would mean £millions missed investment in nature, but make scant difference to energy bills.

The UK is in the foothills of massive infrastructure investment, from critical sectors like energy and water. We mustn't do it at the expense of our Critical Natural Infrastructure.

Kind regards,

Cllr Leon Burdett Bsc(hons)

Mevagissey Climate Action Group

Warm Wales

Warm Wales would like Ofgem to consider the following points re RIIO-3 Draft Determinations

1. Use It Or Lose It (UIOLI) allowance:

We believe this is an effective approach to allow GDNs maximise the benefits of the VCMA, and the mechanism should be continued.

2. Reference to a further governance consultation regarding BAU and VCMA double funding:

Whilst we acknowledge the risk imposed of double funding between BAU activities and VCMA projects, we also recognise that many VCMA projects are built around consumer need and have established first hand links directly within vulnerable communities.

For many consumers VCMA projects are the first point of access and contact when seeking support and enabling some activity now classified as BAU to continue to be embedded into VCMA projects can play a vital role in ensuring vulnerable householders are informed of all available services designed to safeguard them.

In this, we ask consideration be given to allow GDN's to take a flexible approach to specific services and consider options such as enhanced top ups from the Baseline allowance to VCMA projects that could also reach and deliver BAU activities where they complement the VCMA activity in the community. This type of approach would reduce the risk of services being funded twice, enable a wider service coverage for both VCMA and BAU activities, enhance the levels of consumer awareness, engagement and access to services related to PSR and CO and reduce the likelihood of additional expenditure required to mobilise both BAU and VCMA services separately.

Best wishes

Jonathan

Transport for West Midlands

Good Morning

I am responding on behalf of Transport for West Midlands (TfWM), the transport delivery arm of West Midlands Combined Authority.

GDQ18. Do you have any views on the proposed expansion of the Collaborative Streetworks ODI-F across GB?

TfWM recognises the value and importance of Collaborative Streetworks in reducing disruption for our residents and road users in the West Midlands region. Streetworks collaboration can reduce the duration of disruption on our network to help keep the region moving, which in turn also contributes to improving air quality and bringing wider societal value to our communities. Consequently, TfWM would welcome and support the expansion of Collaborative Streetworks ODI-F.

This will require a step change in industry behaviours in the West Midlands and TfWM supports incentivisation to ensure the projects are completed efficiently and innovatively and benefits are fully realised.

TfWM have been working closely with TfL and can see the benefits the current model in London has demonstrated across multiple collaboration projects. We are continuing to work with and learn from TfL in preparation of taking on the central coordinator role for the West Midlands Combined Authority area to oversee the incentive and applicable projects should Collaborative Streetworks ODI-F be implemented across GB.

Should you require further information please contact me.

Kind regards

Carolyn Harris

Head of Key Route Network

Coram's Fields

To whom it may concern,

I am writing as an existing recipient of VCMA funding, through our partner GDN Cadent, and would like to provide some feedback on the recent draft determinations from Ofgem for future VCMA funding. We are a relatively new recipient in funding terms, with our funding period running for 2 years from 2024-2026. For further context, Coram's Fields is a small-medium sized community charity that has been in existence for 90 years, providing a wealth of community services for local children and families, principally across Camden, Islington, and Westminster – London.

Given the vital role that VCMA funding has had on the low income and vulnerable families we work with in such a short space of time, we were pleased to see Ofgem listen to the reflections of the GDNs and continue their commitment to future support for organisations like ourselves. Whilst as a sector, we would always advocate for further investment in our communities, particularly in the context of years of local authority cuts, tax rises, and rising household costs, the proposed investment from the VCMA is significant and has the potential to play a vital role in supporting vulnerable families.

Please see below a summary of our main feedback:

- **The need:** Our seven acre children's park sees over 150,000 visitors per year (nearly all local families) and through our community services, we work with around 700 children and families every week. The majority of the families we work with suffer high levels of deprivation, are often large families, living in flats and accommodation unfit for their family's size. Over recent years, high levels of existing poverty have been exacerbated by the cost of living crisis/inflationary rises. In particular food poverty and fuel poverty (10.7% according to NEA) have become the two most prominent issues for families, resulting in rising debts, increased stress, and anxiety within the home, which often leads to family breakdown, poor child welfare and reduced educational and employment outcomes for young people. In 2024, 36.3% of households (8.99 million) spent more than 10% of their income on domestic energy and it is projected that in 2025, fuel poverty will increase to 11.2% ([Annual fuel poverty statistics report 2025](#)). More than ever, families need additional support – many are unaware of the support that is out there, with support systems lacking coordination and interconnectivity and families struggling with the time and energy to find the support they need.
- **The impact the VCMA has had on our communities** – As a long established organisation embedded within the community we serve, Coram's Fields is a

trusted resource for the 150,000 + families that access our community services each year. Partnerships with families and the wider voluntary and public sector are fundamental to our work in supporting and reaching vulnerable families and getting support to them when they need it most. The VCMA funding from Cadent provides targeted funding towards our Community Outreach, through funding a Community Outreach Coordinator role and investing in our wider programme of services. The funding, even in just the last year has seen us significantly strengthen our current partnerships and opened up a wealth of new partnerships that have enabled us to reach many more families in need, across a wider geographical area - resulting in a significant shift in the impact we've been able to have on these families, through targeted support in areas such as debt/income maximisation, CO awareness and through the provision of energy advice. Our position as a local community resource, means that we are uniquely positioned to deliver support to the hardest to reach families – whether through direct support, or through working in partnership with other trusted and well established organisations, with whom we have existing relationships with. Many families, for various reasons, are mistrusting of statutory services, so the role of hyper local charities like ourselves in being a trusted source of support, is and continues to be essential in getting support to those that need it most.

In summary, the support provided through the VCMA has had a considerable impact on the families we work with and has enabled us to reach thousands more families than we have worked with previously - reducing debts and increasing financial and overall wellbeing for the most vulnerable.

Thanks you for considering the above feedback – if you have any questions on any of the above, please don't hesitate to get in contact.

Best Wishes

Stuart Woods

Seamus Logan MP

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 would urge Ofgem to reconsider 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. 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 must 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.

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 agreed with SSEN Transmission's approach and would urge Ofgem to think again.

I should be grateful if you would keep me informed on this matter.

Yours sincerely

Seamus Logan MP

Emma Roddick MSP

To Whom it May Concern,

I am writing to formally respond to Ofgem's consultation on the Draft Determinations for the RIIO-T3 price control period. The time between 2026 and 2031 is critical for Scotland's transition to a cleaner, more secure, and more affordable energy system, which in turn is essential for achieving Clean Power 2030 in the north of Scotland and creating high-quality, skilled jobs.

I strongly urge Ofgem to reconsider 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. This could have a consequential impact on high quality, nature-based jobs, risk investment, stifle innovation and undermine supply chain confidence.

It is crucial that the expansion of our electricity network goes hand in hand with the restoration of our natural environment. As a region, the Highlands and Islands is at the forefront of the energy transition, but that cannot come at the expense of our natural heritage. It is not just about meeting climate goals, but also about protecting the unique and precious ecosystems that define our home. The climate and nature crises are inextricably linked, and we must treat them as such.

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.

SSEN Transmission's proposals for a £70 million nature restoration fund and a £140 million low-carbon construction fund were ambitious and rightly so. They would have unlocked high-quality, nature-based jobs and stimulated economic growth in both the construction and energy sectors right here in the Highlands and Islands. The fact that this funding is now at risk is a grave concern, and I am calling on Ofgem to reconsider this decision.

Not delivering best practice nature enhancement risks eroding public trust and support for vital electricity infrastructure delivery.

I agreed with SSEN Transmission's approach and urge Ofgem to think again.

Kind regards,

Emma

Gary Treacy

Good Evening,

As a beneficiary of funding support from the SP Energy Networks Net Zero Fund (RIIO-T2), we would like to highlight the essential role that this funding has played in the success of our project.

Therefore, we are formally responding to the SPTQ1 in the RIIO-T3 Draft Determinations - SPT

Dunbar Parish Church Halls is a traditionally constructed stone building dating from the early 20th Century and is an important landmark within the historically significant setting of the Dunbar Conservation Area.

Our project is to deliver a range of decarbonisation and energy efficiency measures alongside parallel refurbishment investment to create and showcase a fit for purpose and future proof community facility for Dunbar in a culturally and historically significant heritage building.

Without the support of the Net Zero Fund for the project development support, we would not have been able to determine the most appropriate approach for this challenging building and to demonstrate the feasibility of a net zero approach over a gas heating system replacement strategy.

However, more importantly, the project would not have been a success without the capital funding support. This is required to deliver the recommendations of that development work and to demonstrate to the community of Dunbar that a Net Zero approach is the correct long term strategy for communities and their facilities and that it is clearly supported by the energy industry. Without the capital funding, in the current market, the project would not have been financially feasible and the development work would have remained a theoretical exercise.

Therefore, on the behalf of Dunbar Parish Church Halls and the community of Dunbar, we thank you for the support we have received and request that a further Net Zero Fund for Development and Delivery is secured for other ambitious local communities across Scotland.

Kind Regards,

Gary Treacy @ DPC Property Committee

Naomi Clarke

To Whom it May Concern

I am writing in response to Ofgem's consultation on its Draft Determinations for the RIIIO-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 would urge Ofgem to reconsider 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. 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 must 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.

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.

Dundee City Council agreed with SSEN Transmission's approach and would urge Ofgem to think again.

Yours Sincerely

Naomi Clark

Chris Baines

This is a personal submission, but based on the following key credentials:

- Firstly, and of greatest relevance, I have served continuously as the **independent chair of the National Grid Stakeholders' Advisory Group** (SAG) which was established in 2013 at the direction of Ofgem. This unique panel of director-level professionals from leading landscape NGOs and NDPBs was originally established to guide the delivery of National Grid's Visual Impact Provision (VIP) programme across England and Wales, with a combined budget through RIIIO-T1 and RIIIO-T2 of £965 million. This provision was made available by Ofgem in response to stakeholder demand. *(As a footnote I have listed the member-organisations, and I believe that many of them will be making submissions individually)*
- In the public sector I have also served as a trustee of the Heritage Lottery Fund and the National Heritage Memorial Fund, with a particular focus on landscape and natural heritage. I have also served as a member of Ofwat's environmental advisory board and as an occasional adviser to Defra ministers.
- As a self-employed professional of more than fifty years standing, I have worked as an independent adviser to senior executives in a wide range of national companies across the energy, water, minerals, built-development, environmental investment, forestry and farming industries.
- In the not-for-profit sector I have served pro-bono as a trustee or an honorary non-executive (president, patron or vice president) for several national conservation charities including the Royal Society of Wildlife Trusts, the Wildfowl and Wetlands Trust, The Countryside Management Association and the National Trust. I have been awarded lifetime achievement medals by both the RSPB and the British Association of Nature Conservationists.
- As an award-winning writer and broadcaster, I was one of the original presenters of BBC Countryfile, and I continue to write and broadcast nationally,
- I am a landscape architect, a Fellow of the Royal Institute of Biology (FRSB), an Honorary Fellow of the Chartered Institute of Water and Environmental Management (HFCIWEM) and a Freeman of the City of London.

Principal objection to the RIIIO-3 Draft Determination – Electricity Transmission

At the heart of my submission is a strong encouragement to Ofgem to review and reverse the proposal in the draft determination with regard to National Grid's approach to landscape impact and biodiversity.

Over the period of RIIO-T1 and RIIO-T2, Ofgem has fostered a growing commitment to sincere community engagement, cross-sectoral partnership working and exemplary nature recovery. In particular, the guidance from the Stakeholder Advisory Group has led to exceptional demonstrations of practical landscape enhancement in many of the UK's most sensitive and popular rural landscapes. As a measure of this success, National Grid has secured a number of national awards and even received personal congratulations from Sir David Attenborough. Given this 12-year record, the draft determination is very difficult for the Stakeholders and the public to understand. If upheld, then it would be a very serious setback, would contradict Ofgem's current support and would threaten to undermine the mutual trust that the SAG process has established.

Conflict with national and international policy and guidance

The proposed business plan from National Grid reflects the UK government's Environment Act 2021, and the Levelling up and Regeneration Act 2023 which require both regulators and the regulated industries actively to further nature recovery, biodiversity and sustainable land management. The Ofgem draft determination contradicts that requirement. It also appears to disregard the Wellbeing of Future Generations Act 2025 in Wales. The National Grid proposals offer an opportunity for this particular regulated company to contribute very directly to Biodiversity Net Gain whilst at the same time addressing the United Nations 2015 Kunming-Montreal protocol, with its government-endorsed commitment to 30% nature-positive land and sea management globally by 2030.

Landscape-scale intervention as a unique ecological opportunity

Most of the energy investment envisaged in RIIO -T3 will involve huge and disruptive interventions across stretches of the rural country in England and Wales. Already it is this landscape impact that is generating much of the local and national campaigning opposition. Through the work of the SAG, and the positive experience of the past 12 years, it has been shown very clearly that the National Grid approach to community engagement and partnership working can significantly moderate that opposition. This has already improved efficiency and forged creative partnerships in a number of particularly sensitive landscapes.

In 2023 the UK government's *State of Nature* report confirmed that England and Wales are now the most nature-depleted countries in Europe and among the 10% of most

nature-depleted countries anywhere in the world. In the government-commissioned *Making Space for Nature* review, generally referred to as the *2010 Lawton Report*, Sir John Lawton summarised the keys to UK nature recovery as “bigger, better and more joined-up” sustainable land management. In the intervening 15 years landscape management has begun to change in favour of nature conservation, regenerative farming etc. The techniques for habitat restoration and sensitive conservation land management have also improved substantially. However, the “more joined-up” element of the Lawton recommendations continues to be very challenging. The water industry has responded by embracing whole-river catchment practices in partnership with the leading conservation NGOs and encouraged by both Ofwat and the Environment Agency. Network Rail and National Highways are also taking practical action to ensure that their linear landscape management favours nature recovery.

The National Grid’s Energy Transmission investment offers some of the boldest opportunities of all, with new transmission lines threading their way through intensively-managed farmland, crossing the coast, and traversing large stretches of the currently damaged and disturbed seabed. The concept of *The Natural Grid* is immediately understandable. This, I believe, is the reason that National Grid’s business plan aims to exceed the 10% Biodiversity Net Gain target wherever possible, and most importantly, to promote practical and meaningful nature recovery, in partnership with third-party land managers, as a feature of *all* their linear landscape interventions. There really is a need to extend support to those aspects of the programme that are assumed to have “deemed consent” since this is the aspect of the new infrastructure that may threaten the greatest impact in the landscape.

Delivery through partnership

The draft determination suggests that National Grid would be overstretched in trying to deliver the proposed scale of biodiversity gain and landscape enhancement. This is to misunderstand the process. After 12 years of shared learning through the work of the SAG, National Grid has a robust relationship with several partner organisations that have well-established expertise in landscape protection and habitat restoration. Moreover, organisations such as the Wildlife Trusts, the RSPB and the National Trust are predisposed to work with communities, to involve volunteers and to carry their millions of members with them. The role of National Grid is vital in facilitating large-scale opportunities and forging positive partnerships. This pivotal role is already complemented by the conservation NGOs' land management expertise and implemented within frameworks that are fostered by key NDPBs including NRW and Cadw in Wales, and Natural England and Historic England.

Bill payer value for money

Over the past twelve years, customers' willingness to pay for landscape protection and improvement to their countryside experience has been confirmed a number of times. The value of access to nature is increasingly recognised as a significant benefit for mental and physical health and wellbeing. The almost universal local concern expressed by the public as the new energy infrastructure is rolled out is further testament to the value that people place on their local landscape. Ofgem's 10-year support for the Landscape Enhancement Initiative in National Landscapes and National Parks has enabled National Grid and its partners to demonstrate many times over, that modest investment in the landscape is extremely popular. I was delighted to see that Ofgem is minded to continue endorsing that programme, and it should serve as a practical model for future landscape enhancement beyond the boundaries of the nationally-protected landscapes.

Endorsing National Grid's wish to continue delivering landscape enhancement and nature recovery throughout all of its infrastructure network will undoubtedly help with community acceptance of any local and temporary disruption. It will leave a very valuable and improving legacy alongside the renewable energy infrastructure. I believe it is most certainly "in scope" for this industry at this time and in the current political circumstances, and that any small cost to electricity consumers will be repaid many times over for local families and for future generations.

Stakeholder acknowledgement

Ofgem's 2013 initiative to establish a national landscape-based Stakeholders Advisory Group was, I believe, a masterstroke. National Grid, Ofgem and the stakeholder

community are already in the position to which many other regulators and industries now aspire. Together we have established a track record of successful landscape and corporate culture-change in the context of extremely large-scale infrastructure investment. The stakeholder organisations have exhibited remarkable loyalty and voluntary commitment to the SAG. It therefore seems inconceivable that Ofgem would want to undermine all that shared success, just at a time when the general public, politicians and even the international community are calling for a much more proactive approach to sustainable development, nature recovery and the valuing of ecosystem services.

Conclusion

Ofgem's support for the Stakeholders Advisory Group, the VIP programme and the Landscape Enhancement Initiative over the past two price review periods has been extremely beneficial for both the British Landscape and for community relations. Members of The Stakeholders Advisory Group were delighted to see National Grid's determination to build on our positive shared experience through their business plan for RIIO-T3 - and then surprised and very disappointed to see Ofgem's draft determination and the apparent undermining of our work over the past twelve years. I very much hope that the regulator will recognise the huge commitment of the stakeholder organisations, will acknowledge the political and popular direction of travel, endorse the legislative framework in England and Wales, and support those elements of National Grid's RIIO-T3 business plan that are intended to aid nature recovery and improve public benefit across the entire investment programme.

FOOTNOTE. Members of the National Grid Stakeholders Advisory Group, August 2025:
Independent Chair, Professor Chris Baines

- The National Trust
- The Landscape Institute
- The Royal Society for the Protection of Birds
- The Royal Society of Wildlife Trusts
- CPRE (Campaign to Protect Rural England)
- CPRW (Campaign to Protect Rural Wales)
- The Ramblers
- The Campaign for National Parks

- The National Landscapes (AONB) Association
- The Association of National Parks in England
- The Association of National Parks in Wales
- The Coastal Partnership Network
- Natural England
- Natural Resources Wales
- CADW
- Historic England

Observers:

- Ofgem
- National Grid

Alan Roseweir

Response to Ofgem RIIO - T3 Draft Determination

My response is with reference to SPTQ1

Introduction

My name is Alan Roseweir I am responding in the capacity as Chair of The Fort Seafield and Wallacetown Community Association (SCIO) Registration Number SC05118 and as Project Lead for the Wallacetown Community Energy Project. This Project was partly funded by RIIO – T2 Net Zero fund.

To provide a bit more context and detail about our ambitious project, (4 years in development) I have attached a copy of a draft information leaflet that will give you an insight into our project. I should note that this project goes live this week.

The reason I have highlighted the 4 year timescale is specifically important in relation to the question. In the attached information leaflet you will have seen that we were able to secure, from another source funding to complete our feasibility studied. We then persevered with CARES to secure the capital Funding for the Project. Unfortunately the criteria (2021 -2024) set out for funding allocation did not align with our project. It was only when RIIO – T2 Net Zero funds became available we were able to accelerate and deliverer what is a bold an ambitious Project. I should point out that when we were preparing our bid CARES changed the scope of what projects were fundable, I pleased to report ours met the criterial. It is all important to state that a condition of the Net Zero funding was the match element. Therefore we were able to secure the full grant funding for this Community Project.

RIIO – T2 Net Zero fund provided the majority of this funding (2/3).

This is a 25 year partnership project with South Ayrshire Council.

If Ofgem decide to remove opportunities to access funding like this you will starve Communities, not just the funding but the opportunity to drive hope and determination for communities now and in the future. In our case Wallacetown one of the most deprived areas in Scotland where people want to leave not live. This, our project will help to change to be a place where people want to live not leave. The ambition being making Wallacetown a 'Net Zero Village'. Ofgem would want to be associated with projects like this.

So I would ask to think long and hard about cutting this lifeline to the future off. Without a doubt we would not be sitting with a live project today and the buzz and excitement this is generating. To that end we are producing a video that will tell the full story from concept- birth – delivery which we will openly share with all.

Happy to be contacted if required.

Kindest regards

Alan Roseweir Chair Fort Seafeld and Wallacetown Community Association and Project Lead for Wallacetown Community Energy Project

Alzheimer's Society

To whom it may concern,

We would like to submit responses to the consultation questions for the Draft Determinations:

GDQ11. Do you agree with our proposed design of the VCMA UIOLI mechanism?

Thank you for the opportunity to respond to the proposed design of the VCMA UIOLI mechanism. Whilst we welcome the continued commitment to supporting vulnerable consumers through the VCMA, we believe the **proposed funding level is not sufficient** given the **scale and urgency of need** across the communities we serve.

The VCMA has already demonstrated its **transformational impact**, enabling gas distribution networks (GDNs) to partner with charities and community organisations to reach those most at risk. These partnerships have delivered **life-changing support**, particularly ours for people living with dementia, their carers, and others facing complex vulnerabilities.

However, the **context has changed dramatically** since RIIIO-GD2. According to National Energy Action, **fuel poverty is at record levels**, and the **Annual Fuel Poverty Statistics Report 2025** highlights that:

- In 2024, **36.3% of households** (8.99 million) spent more than 10% of their income on domestic energy.
- This is projected to rise to **11.2% of households** in 2025.

This escalation places **unprecedented pressure on frontline charities**, whose services are increasingly relied upon to mitigate risks such as cold homes, CO exposure, and financial hardship. The current proposal, although higher than initially suggested, still represents a **reduction from RIIIO-GD2**, which risks limiting the **scope, scale, and sustainability** of vital initiatives.

We urge Ofgem to consider the following:

- **Charity partners like Alzheimer's Society** have unique reach into vulnerable communities that energy networks cannot directly engage. VCMA enables these partnerships, making it one of the most **cost-effective and socially impactful mechanisms** in the RIIO framework.
- People with dementia spend **on average 22 hours a day at home**, increasing their exposure to energy costs and CO risks. Their symptoms can lead to **mismanagement of energy use**, compounding financial and safety concerns.
- Carers of people with dementia face **significant financial strain**, and rising energy costs intensify this burden. VCMA-funded projects provide **trusted signposting and tailored support**, which is essential for these households.

To truly reflect the **scale of vulnerability** and enable **longer-term planning and innovation**, we recommend that VCMA funding be **increased** beyond the proposed £165m. This would allow GDNs and their partners to deliver **consistent, high-impact support** rather than being constrained to short-term or limited interventions.

In light of the rising fuel poverty statistics and growing complexity of consumer vulnerability, increasing VCMA funding means Ofgem can empower GDNs and their partners to deliver **sustainable, innovative, and inclusive support that meets the real needs of millions of households across the UK**. We stand ready to collaborate and share further evidence to support this case.

Kind regards,

Lizzie

Affric Highlands

To whom it may concern,

Please find below our objection to Ofgem's proposal to reject SHET's Species and Habitat UIOLI (SHETQ3) and our response to ETQ11:

SHETQ3. Do you agree with our proposal to reject SHET's Species and Habitat UIOLI?

No, we do not agree with Ofgem's proposal to reject SHET's Species and Habitat UIOLI. Their proposed Species and Habitat UIOLI would provide a much-needed source of funding for environmental charities currently working within funding structures that are not appropriate for what is actually needed from an ecological standpoint. Below I will outline some of the current funding mechanisms we can apply to, why they are often impractical ecologically and hopefully this will demonstrate why the Species and Habitat UIOLI is so badly needed;

Scottish Forestry – Forestry Grant Scheme

Scottish Forestry operates a Forestry Grant Scheme, but the scheme was designed to support commercial forestry rather than the creation of healthy and biodiverse woodlands. Even for commercial forestry projects, the grant usually does not cover the full costs and for the creation of native and biodiverse woodlands, the grant pays even less which pushes applicants towards the less ecologically sound options.

The following paragraphs describe in detail why the Forestry Grant Scheme is of very limited use to support the creation of near natural woodlands.

- The Forestry Grant Scheme **encourages tree planting over natural regeneration**. Payments are directly linked to the number of trees planted, which also encourages planting at relatively high densities. However, at no stage of the application process is there a requirement to identify any existing ancient woodland remnants which might be present on the landholding and protect these and their unique genetic material. **Across the Scottish Highlands, ancient woodland remnants are in very poor condition** due to chronic over-browsing which has caused woodlands to shrink in size and lose their diversity from trees and shrubs to herbs, grasses and lower plants. From an ecological standpoint, **natural regeneration of these areas would be far superior in terms of ecosystem benefits** (e.g. established mycorrhizal network are better able to support new tree growth, preserving the genetic diversity of plant species present). It is also cheaper and does not disturb the soil by mounding or other

invasive techniques. However, **there is no financial incentive for allowing natural regeneration of trees to take place** and the assumption is that natural regeneration would only occur in a very small buffer around existing, mature trees. Tree planting through the Forestry Grant Scheme has its place, however, to protect existing woodland remnants and their unique diversity and allow them to regenerate naturally, the scheme is not suitable.

- **Riparian woodland creation does not work well under this scheme.** The measure of success for the Forestry Grant Scheme is the number of stems per hectare that are established after a certain number of years. **Riparian woodlands do not fit well into this categorisation, as they are naturally scattered** along riverbanks where the ground conditions are highly variable (e.g. shallow flood plains, peaty soils, and various other natural processes can affect tree establishment which creates gaps along watercourses). However, they usually contain a high diversity of trees and ground flora, provide shade to watercourses (lowering their temperature on hot days helping salmon and trout populations), provide leaf litter which deposits nutrients in our burns and rivers, feeding invertebrates and roots and branches growing into water courses which creates complexity for fish life cycles. As riparian woodlands are naturally following a watercourse, they are usually long and narrow, resulting in high fencing costs for relatively small areas of enclosed land. In addition, they require water gates which, depending on the width of the watercourse can be very costly to build and maintain. As a result, the Woodland Grant Scheme is not suitable tool for riparian woodland creation at a large scale as the benefits of riparian woodlands for healthy rivers are of no relevance to the scheme.

Whilst SSEN has two funding streams: Biodiversity Net Gain and Irreplaceable Habitats, neither of them works well in the context of the Scottish Highlands or our work.

- **Biodiversity Net Gain does not work in the Scottish Highlands**

SSEN's Biodiversity Net Gain (BNG) metric was designed out with a Scottish context. Their model was developed by Natural England (a later version of which became the DEFRA metric) and modified to better capture Scottish habitats (e.g. upland areas, peatland). Nevertheless, it still does not work well in a Scottish context. Furthermore, there is an even more fundamental issue with the Biodiversity Net Gain approach. It is based on a habitat survey, carried out at the start of a project. **Identified habitats are then assigned a value based on their European rarity** (for

example Annex I habitats like dry heath and wet heath). Habitats of a low ecological value, such as farmland, can be modified and turned into something of a higher ecological value, however, habitats of a high ecological value, **such as dry or wet heath (in the eyes of European context), must be preserved and their condition improved.**

The issue is that **in the Scottish Highlands, we have an artificial overabundance of both dry and wet heath habitat.** This is a result of hundreds of years of poor land management practices (e.g. deforestation, burning) and overgrazing from sheep and deer. **Habitats here have often been degraded to the point in which where they are now dry/wet heath habitat,** but they may have previously been grassland, woodland or another habitat with greater biological diversity. This means as an organisation focused on ecosystem restoration, which is based on habitats being dynamic and developing, not being fixed entities, **it is almost impossible to implement any projects using the BNG stream.**

For example, if an SSEN project affects a badly degraded area of dry or wet heath, BNG would require them to reinstate the same area plus at least 10% extra of dry or wet heath somewhere else to balance out the calculations. This means, that protecting an area of dry heath along a river from grazing – which would result in natural regeneration of trees to occur – **would not be allowed under the BNG scheme** since the dry heath habitat would be lost over time to a woodland. (This is an example of project we previously discussed with SSEN along one of the OHL routes.)

- **We believe Irreplaceable Habitats are exactly that.**

One of SSE's current funding streams is under Irreplaceable Habitats whereby you can receive funding for a project that will **protect an area classified as 'irreplaceable'** because **another area classified as 'irreplaceable' has been disturbed or destroyed.**

One of our main goals as an organisation is to identify pockets of remnant ancient woodland, protect them, and help them expand out into the landscape. Some of these ancient woodland pockets are likely to have been there continuously since the previous ice age, approximately 11,000 years ago, setting seed for generations in the same place. We genuinely believe that **these pockets of ancient woodland are invaluable ecologically and culturally.** We appreciate that the route finding for SSE projects will at times result in the loss of irreplaceable habitats, however, as an organisation focusing on the preservation of irreplaceable habitats, we are ethically unwilling to work with the SSE **'Irreplaceable Habitats' funding stream and accept funding under it.**

ETQ11. Do you have any views on our proposed approach to biodiversity funding, notably whether it is appropriate or not for consumers to fund biodiversity outputs beyond legislative requirements?

Our view is that biodiversity funding is something that consumers will benefit from directly and indirectly. Biodiversity funding that would be available to protect and expand existing woodland remnants and allow for the creation for riparian woodlands and other native woodlands without the limitations of a Forestry Grant Scheme will create a resilient habitat mosaic in the Scottish Highlands – and this is essential in the light of the changing climate and the biodiversity crisis. We are already experiencing drier and warmer summers, with increased wildfire risks, to which the existing expanses of heather monoculture (dry heath/wet heath) have no resilience. Rainfall events are becoming less frequent, but heavier, which combined with dried out soils results in flooding and landslides. Diverse habitat cover is absolutely essential to stabilise the ground, reduce and slow down water run-off and prevent and reduce the impacts of these events.

Supporting these measures **will directly benefit all people living in the Highlands** by helping to manage the risks of wildfires, flooding and landslides to human life. Furthermore, these living and diverse landscapes have a huge value for recreation and wellbeing. Everybody who accesses the outdoors will benefit from such landscapes on a personal level.

Disproportionate effect of energy infrastructure on Highland Communities

It should also be considered that the Scottish Highlands have been, and still are, experiencing an unprecedented drive to harness renewable energy in the form of wind and pumped hydro schemes. The required infrastructure for these schemes and their connection to the grid has been growing continuously for over 20 years and some communities and areas in the Highlands have been affected disproportionately.

In the coming years, there will be even **more infrastructure being put into rural areas**, often on narrow/poor road infrastructure that will need to be upgraded to deal with the numerous HGVs, machinery and workers that will be travelling along them. In some areas, there are plans for temporary communities to house workers (e.g. Broadford in Skye is expected to host 1,000 temporary workers, doubling the population of the village). Naturally, this will cause **untold disturbance to residents** living in these areas. People living in rural communities in the Scottish Highlands can often travel long distances to access basic healthcare (e.g. driving a couple of hours to Inverness to go to the dentist) which can already take much longer in the summer due to the boom of tourism in the Highlands without any of these infrastructure projects taking place.

Scotland is net exporter of renewables, yet pays highest energy bills

Scotland currently produces an over-abundance of clean energy, 38.4 TWh in 2024, of which 19.7 TWh was exported to the rest of the UK. In the coming years, this is likely to increase even further. As we all know, renewables are the cheapest electricity available in the energy mix. Despite this, **consumers living in the Highlands must pay the highest energy bills in the UK**. Therefore, we believe that it is only fair, that more money is made available to help benefit communities and nature in these landscapes.

Due to the issues highlighted, there is a feeling of resentment towards energy companies and the perceived 'industrialisation of the Highlands'. It makes it tricky in general to accept money from SSEN, particularly through their BNG and irreplaceable habitat streams, especially if infrastructure has negatively impacted upon local communities we are trying to work with.

However, if you could provide additional funding so that SSEN could grant money through their Species and Habitat UIOLI, it would be much less contentious in the eyes of communities. Additional funding to restore habitats outside of any BNG and Irreplaceable Habitats considerations would be very welcome to support all efforts to protect the habitats and ecosystems in the Highlands. This could allow for the natural regeneration of woodlands, the creation of wetlands, river restoration project and more, above and beyond the compensation or mitigation for infrastructure projects that are affecting this part of the Highlands so heavily.

I would be happy to discuss any of these points in further detail. If you have any questions, then please feel free to ask and I will attempt to clarify.

Kind regards,
Jack Cunningham

Ramblers

I am writing on behalf of the Ramblers, Britain's largest walking charity, in response to the Ofgem Consultation on the RIIO-3 ET Draft Determination.

The Ramblers have signed up to the Wildlife and Countryside Link response to this consultation and this is a short addendum to that submission .

The benefits of walking are well known (see, for instance, this recent study published by the published in the [Lancet Public Health](#)). However, the quality of the spaces in which walking takes place is also crucial and, in this addendum, we want to highlight the importance of access to nature rich spaces. We believe that customer support for spending on nature, is a testament to the clear benefits that customers see from accessing nature – for instance, an analysis of the Natural England's Monitor of Engagement with the Natural Environment survey, undertaken by the [New Economics Foundation](#), found that having at least 120 minutes of contact with nature per week led to a significantly higher probability of reporting 'good health and well-being'.

Modest investment in landscape and nature improvement has minimal impact on customer's bills but have a long-term positive impact on the communities impacted by new energy infrastructure (and could offset initial opposition to such infrastructure). We urge Ofgem to reconsider their approach in the draft determination regarding National Grid's approach to landscape and biodiversity.

Best wishes,

Jack

GMB Union

To OFGEM RIIIO3 team

GMB Union Gas Distribution consultation response

GMB is a trade union representing over 500,000 workers and is the largest union in the gas distribution networks, representing employees in front line industrial/field force, supervisory and office roles. We believe it's important that those working in the sector, as key stakeholders have a voice and their views on the Gas Distribution draft determinations are heard and incorporated in the final determinations.

Two of the four gas distributions networks have already cut jobs in anticipation of the efficiency requirements in the draft determinations and this is worrying because necessary work will not be carried out or there will be fewer staff trying to do more work. The fear of efficiencies in each regulatory period results in GDN's making knee jerk reactions and job cuts.

We believe a different approach is required by OFGEM in relation to efficiencies. Asset maintenance and Workforce resilience is undermined by GDN's cutting jobs in anticipation of business plans cuts by OFGEM.

In RIIIO2, GDN'S argued that they needed to cut jobs, reduce pay & conditions of new starters and close defined benefit pension schemes to meet OFGEM funding requirements and efficiencies. This led to a race to the bottom but over the course of RIIIO2, these reductions in terms & conditions has meant that the GDN's have found it harder to attract, recruit & retain employees. The result has been that GDN's have relied on fewer employees doing longer hours and covering wider patches to cover rota's they cannot fill. This has meant GDN's have not made sufficient progress to reduce fatigue, which is a priority for the Health & safety executive.

We believe that more revenue is needed to ensure GDN's employee enough people to maintain and repair the networks. There should be more oversight by OFGEM to ensure workforce resilience and planning within the gas distribution networks.

We are concerned that asset health and maintenance will be undermined by GDN's looking to outsource work to meet reductions in GDN business plans. Overall the GDN's have been moving away from outsourcing and this has been beneficial to customers, the GDN's and the workforce. We don't want to see business plan revenue reductions in the final determinations which will increase outsourcing. This would be a retrograde step believe which will be less reliable, less cost effective and less safe way to deliver work for the customers.

We believe that there needs to be sufficient revenue funding provided to GDN's to ensure workforce resilience with a directly employed workforce.

With significant investment in electricity transmission, nuclear and water sectors over the next five years the gas distribution will need sufficient funding attract, recruit, and retain workers. Recently, Water UK said that the water sector will be looking to increase its direct labour workforce by 16, 900, supply chain by 15,000 and create 5,000 new apprenticeships over the next five years. The nuclear sector says it will require 30,000 to 40,000 more workers with Sizewell C and SMR development being given the green light by Government. The competition for labour in energy and water is going to be high. Already, Cadent has seen a drift in employees going to work for Severn Trent and to National Gas. Many workers in gas distribution have desirable transferable skills. The GDN's are going to have to offer better pay and conditions to compete.

We welcome the inclusion of workforce resilience plans in company business plans. We want to see the overall levels of revenues increased for gas distribution networks to ensure they can attract, recruit and retain employees.

Regards

Gary

Professions for Health

Subject: Objection to SP Energy Networks' RIIIO-T3 Business Plan (2026–2031)

Dear Sir/Madam,

I am writing to formally object to SP Energy Networks' proposed RIIIO-T3 Business Plan for the period 2026–2031. While I acknowledge the importance of improving energy infrastructure to support Net Zero targets, I am deeply concerned that the current plan underestimates the costs, risks, and cumulative social and environmental impacts that such extensive works will have—particularly across the rural Scottish Borders where I am a resident.

1. Consumer Cost Burden

Although the proposed increase to household energy bills is described as modest, these charges add to already high living costs and ongoing bill increases from other operators. For many households, especially in rural Scotland where energy bills are disproportionately high, even small annual rises are unsustainable.

2. Environmental and Community Impacts

The plan underplays the very real, long-term impacts of large-scale transmission corridors and substations. Communities in the Scottish Borders already face significant pressures from existing and planned renewable energy projects, including wind farms, solar farms, BESS and associated infrastructure. The cumulative effect of new pylons, substations, access roads, and cabling is a profound alteration of landscapes, biodiversity, and rural character. Visual intrusion, habitat loss, and construction disturbance threaten not just the environment but also tourism, which is a vital part of the Borders' economy.

3. Delivery and Planning Risks

Major projects of this scale frequently face delays due to local opposition, planning refusals, and legal challenges. The Scottish Borders has already seen resistance to infrastructure development where communities feel their voices have been marginalised. These risks could significantly inflate costs, which will ultimately fall back on consumers.

4. Financial Assumptions

The plan rests on uncertain long-term financial forecasts for inflation, credit ratings, and cost of capital. In the current economic climate, these assumptions are highly unstable, leaving households exposed to escalating costs if projections prove inaccurate.

5. Overdependence on Policy and Innovation

The plan assumes rapid deployment of renewable energy projects and enabling technologies. However, this ignores the uneven pace of development and the policy risks associated with shifting government priorities. Communities in the Borders are already facing a disproportionate share of renewable infrastructure, with no clear strategy to balance the regional impact.

6. Cumulative Impacts Ignored

What is most concerning is the lack of recognition of the accumulative effects of infrastructure projects already underway across the Borders. New transmission lines, substations, and renewable generation sites, when combined, impose far greater environmental and social costs than any single project in isolation. Rural communities are being asked to shoulder an unfair share of the burden for the UK's transition, with limited direct benefit to local people.

For these reasons, I believe the RIIO-T3 Business Plan, in its current form, is not in the best interests of consumers, rural communities, or the environment. I therefore urge Ofgem and decision-makers to:

- Re-evaluate the scale and timing of investment in areas already saturated with renewable and transmission projects.
- Undertake a thorough cumulative impact assessment for the Scottish Borders and similar rural regions.
- Strengthen cost-control measures to protect consumers.
- Ensure transparent and meaningful community engagement that goes beyond consultation and results in real change.

Until these issues are addressed, I cannot support this plan.

Please also note that our local Community Council was only made aware of this consultation on 21/08/2025 hence giving insufficient time for a community response.

Yours sincerely,

Jane Johnston

Nattergal

Dear Ofgem,

We are commenting on the proposed rejection by Ofgem (in paras 3.112 et seq of their electricity transmission document) of National Grid's proposal approach to biodiversity, which involves going beyond statutory biodiversity net gain.

There are many reasons that this proposed rejection would have terrible consequences, the main being that the minimum statutory net gain requirement is still likely to lead to nature loss and so the National Grid by going beyond it would actually be delivering a net gain for society. Nature is critical infrastructure and if we undermine it through underinvestment, the investments the grid are making will only be degraded quicker as we lose our ecosystems.

- National Grid's proposals had themselves been less ambitious than those which the environmental NGOs had suggested, seeking they say to achieve a balance for customers.
- Ofgem and National Grid both have statutory requirements to have regard to biodiversity, under the Environment Act, and to protected landscapes under the levelling up Act. Ofgem's draft determination appears to us inconsistent with these duties.
- There is clear customer support for and customer value from company spending on nature – some evidence suggests this support is even stronger than for spending on net zero.
- In the current regulatory period OFGEM had supported and incentivised biodiversity actions beyond legal compliance, as has Ofwat's recent price review. This is a step backwards

- The arguments that Ofgem should simply level up Scottish companies to the English statutory position is ignorant both of the devolution settlement and of the greater stress on English (and Welsh) biodiversity

National Grid's proposals could have greater benefits in rural areas – where they can help reduce opposition to new infrastructure and create 'biodiversity corridors'

The total costs of the changes proposed by National Grid are material but only add marginally to bills.

With kind regards

Ivan de Klee

Dear Sir / Madam

To ensure all the renewable energy being generated over the next few years can effectively reach around the country, the National Grid will need to upgrade and expand its network.

As a landscape professional, I am very concerned that this is done responsibly, taking full account of the likely impact of all this work on the environment. As such, it is reassuring to note National Grid's plans for significant "net gain" for wildlife, beyond the minimum biodiversity net gain requirement in planning law and also where the Grid's projects won't need planning permission.

It is too late for me to respond to the consultation, where Ofgem looks to be not supporting this initiative. Why? Nature decline tragically continues, so the least Ofgem should do is to encourage National Grid (and all energy companies) to deliver net gain + in their operations.

The combined climate and biodiversity crises can be greatly countered by government regulatory bodies using their powers to compel industry to do their bit. The appalling state of our waters is a classic example of a weak regulator (Ofwat). In contrast, Ofgem has National Grid's positive plans to help tackle the climate and biodiversity concerns, it needs to step up and be that effective regulator, to ensure that the millions of £pounds of investment includes a full commitment to nature recovery, which would make minimal difference to energy bills.

The Secretary of State for Energy and Climate Change is pushing hard for renewable energy as our future, to decarbonise the UK's energy system and combat climate change. This needs to go hand-in-hand with restoring nature. National Grid is aligning itself with the ministerial message, Ofgem needs to prove its worth by fully supporting and pushing further National Grid (and all energy companies) to deliver here, not weakly ignoring the climate and biodiversity crises.

Yours, much concerned,

Phil Belden

Roy Howard

Dear all,

I have scan read the above document having only received it I the last few days and wish to make a response under 13.10.

As someone concerned about cyber security I read that section with interest and those who know my concerns know something about why. Please respect that.

13.10.2 I pick up in the document that it is concerned with the costs for companies and consumers in the desire to reach net zero. The phasing out of gas will bring energy costs to the consumer down. Some concern is expressed about a dwindling number of consumers having higher bills as a result. Simplistic perhaps but concerning for that portion of the populace. I guess that RIIO-3 seeks in part to mitigate against that in the longer term. However, I find nothing about current costs being borne by the consumer through the taxes they pay to prop up the NHS because too many of us continue to use fossil fuels to heat and cook in our own homes.

It is that I would ask is addressed following this submission.

13.10.6

As I have little to add or capacity to challenge in the rest of the document, I hope someone within your organisation has the wisdom to take in the wider consideration of costs to the consumers other than appear in your document, and may even add a paragraph or two to acknowledge it, perhaps even charging the energy companies to incorporate this recognition of cost (and responsibility for addressing it) in their business plans.

Your reference to health seems to involve seeking to ensure heat etc is available to all, recognising the necessity for vulnerable groups. No focus is given, however, to the health of individuals affected by the dangerous emissions that cause:

1. An average of 2 deaths p.a. (HSE figures)

2. As many as 4000 A&E consultations p.a
3. Numerous consultations for people whose chronic conditions have CO identified history.
4. Far more, when those conditions have no known cause, but is not beyond the realms of possibly that CO or other in house pollutants are responsible.

The industry seems reluctant to take this concern seriously enough to ensure the safety of individuals who bear a personal, emotional and financial cost as victims (known or unknowingly) of poisoning.

I read with interest your own responsibilities, particularly 1.6

And also your expectations of network companies 1.9

Would it be inappropriate for me to ask / require you to take this submission seriously, and work together with the HSE, the Network Companies and the charitable sector, trying hard to ensure the safety of consumers, and recognise the costs identified above and seek to mitigate the damage done to human lives, relationships and at least this consumer's confidence in the structures of society which prevent the NHS from fulfilling its charter to prevent disease, concentrating on trying to treat often untreatable conditions caused by poisoning.

Perhaps you will be kind enough to forward to me the finalised copy of RIIO -3

Yours sincerely,

I am not a robot

RH