

Consultation

Statutory Consultation on Norwich – Tilbury (AENC/ATNC) Early Construction Funding application and corresponding proposed modification to Special Condition 3.41 of NGET's electricity transmission licence

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Executive summary

Under National Grid Electricity Transmission plc (NGET) electricity transmission licence, Special Condition (SpC) 3.41 'Accelerated Strategic Transmission Investment Re-opener and Price Control Deliverable term (ASTIRt)' - Part C: Early Construction Funding¹, we can provide Transmission Owners (TOs) with Early Construction Funding (ECF) to enable permitted early construction activities that are required to accelerate projects before an ASTI Project Assessment (PA) Decision. The permitted early construction activities are:²

- Strategic land purchases;
- Early enabling works;
- Early procurement commitments; and/or
- Other activities approved in advance by Ofgem.

In September 2025, NGET submitted its ECF application to us in line with SpC 3.41.73 and the ASTI Guidance and Submission Requirements Document⁴ for the Norwich – Tilbury project with Network Option Assessment (NOA) codes AENC and ATNC. This is the second ECF application for the Norwich to Tilbury project following the decision⁵ to approve 2.93% spend on AENC in April 2025. As part of our assessment of this ECF application we have undertaken a high-level analysis of the proposed early construction activities to determine whether they are justified and eligible. The application is for 45% of the licence cost, which is above the default 20% threshold of the total forecast project cost as set out in the ASTI Confidential Annex. As per the ASTI licence referenced above, we are permitted to allow ECF in excess of this where the TOs have demonstrated to us that the expenditure is necessary to accelerate project delivery or where not investing will increase the risk of project delay. We must also be satisfied the consumer benefit of providing additional allowances outweighs the increased risk to consumers should the project not ultimately secure planning permission. Additionally, NGET must demonstrate that they have sufficient consumer protections in place to reduce consumer exposure to financial loss in the event the project is cancelled.

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¹ <u>Licences and licence conditions | Ofgem</u> Electricity licences and conditions, Transmission Licence, National Grid Electric Transmission Plc – Special Conditions

² <u>Decision to modify the special licence conditions in the electricity transmission licences: Accelerated Strategic Transmission Investment | Ofgem Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document, paragraph 4.13</u>

³ <u>Licences and licence conditions | Ofgem</u> Electricity licences and conditions, Transmission Licence, National Grid Electric Transmission Plc – Special Conditions

⁴ <u>Decision to modify the special licence conditions in the electricity transmission licences: Accelerated Strategic Transmission Investment | Ofgem Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document, paragraph 3.12</u>

⁵ Norwich Tilbury: Early Construction Funding decision | Ofgem

Our minded-to position is to amend the allowances set out for this project in Appendix 1 (ASTIAt) of SpC 3.41 'Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIRt)' in NGET's electricity transmission licence (the Licence) to reflect NGET's ECF expenditure request for the following categories:

- Strategic land purchases;
- Early enabling works
- Early procurement commitments
- Other (Biodiversity Net Gain)

Our minded-to position is to adjust the allowances set out in Appendix 1 (ASTIAt) of Special Condition 3.41 'Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIAt)' in NGET's electricity transmission licence to allow NGET's ECF expenditure request. The term will have the value given in the corresponding updated version of the ASTI Confidential Annex. The statutory notice of our proposed modification to adjust the ASTIAt term as referenced in Appendix 1 SpC 3.41 is included in Appendix 1 of this consultation.

We do not undertake a detailed cost assessment at this stage and we do not form a view on whether the proposed expenditure is efficient. We undertake these assessments as part of a full cost assessment, including of early construction costs, at the Accelerated Strategic Transmission Investment (ASTI) Project Assessment (PA) stage. TOs can ultimately only recover costs considered to be efficient following a project assessment.

1. Introduction

Purpose of this consultation

This consultation seeks stakeholder views on Ofgem's minded-to position to amend the allowances set out in Appendix 1 (ASTIAt) of Special Condition 3.41 of NGET's electricity transmission licence, to reflect the full Early Construction Funding (ECF) request for the Norwich to Tilbury (AENC/ATNC) project. NGET's application is for 45% of the total project forecast cost, as stated in the ASTI Confidential Annex, and submitted under Part C of SpC 3.41. This corresponds to 22.7% of the updated project cost.

As per the ASTI guidance, we can consider allowing ECF in excess of 20% in exceptional circumstances. This would be where expenditure is justified and necessary in order to accelerate project delivery or where not investing will increase the risk of project delay, and where we are satisfied the consumer benefit of providing additional allowances outweighs the increased risk to consumers should the project not ultimately secure planning permission. This consultation sets out our rationale for exceeding the cap originally set in the ASTI Confidential Annex.

Respondents are asked to consider whether the activities set out in this ECF request are in the consumer's interest and support timely delivery of strategic infrastructure. We have included the specific consultation questions in Chapter 3.

We note that the purpose of ECF is to enable permitted early construction activities prior to the project receiving planning consents and being finalised. We are not involved in the planning decision and awarding of ECF should not influence the outcome of the relevant planning processes. We encourage stakeholders to engage directly with the planning process, as this remains the most appropriate place to voice any comments on project design or scope.

What we are consulting on

This document sets out our minded-to position on NGET's ECF application for the Norwich-Tilbury construction project⁶ which consists of the network reinforcements under the Network Options Assessment (NOA⁷) codes AETNC/AENC. The accompanying appendices outline our proposed modifications Special Condition 3.41 of the electricity transmission licence held by National Grid Electricity Transmission Plc and our notice of statutory consultation on our modification.

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⁶ <u>Decision on accelerating onshore electricity transmission investment | Ofgem</u>

⁷ Network Option Assessment (NOA)

This document will refer to the "Norwich – Tilbury project" and "AENC/ATNC" to capture the entirety of the construction project. The separate NOA codes may be referred to when discussing specific reinforcements.

Chapter 2 summarises our view on the ECF application for the Norwich-Tilbury project and our minded-to position.

Our minded-to position is subject to feedback and responses to our questions, and so we welcome stakeholders and community members to respond using the contact details set out on the front page of this document.

The consultation questions are:

Q1: Do you agree with our minded-to position to provide ECF for the project?

Q2: Do you agree with our proposed modification to adjust ASTIAt in Appendix 1 of SpC 3.41?

Related publications

Decision on accelerating onshore electricity transmission investment: <u>Decision on accelerating onshore electricity transmission investment | Ofgem</u>

Accelerated Strategic Transmission Investment Guidance And Submission
Requirements Document: <u>Accelerated Strategic Transmission Investment Guidance</u>
<u>And Submission Requirements Document</u>

Norwich Tilbury – Early Construction Funding consultation: Norwich Tilbury – Early Construction Funding consultation | Ofgem

Norwich Tilbury: Early Construction Funding decision: Norwich Tilbury: Early Construction Funding decision | Ofgem

Consultation stages

Stage 1 Consultation open: 14 November 2025

Stage 2 Consultation closes (awaiting decision). Deadline for responses: 20 December 2025

Stage 3 Responses reviewed and decision published: 30 January 2026 (indicative date subject to change)

Stage 4 Modification decision comes into force - approximately 56 days after the decision by virtue of S.11A(9)

How to respond

We want to hear from anyone interested in this consultation. Please send your response to the person or team named on the front page of this document.

We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website.

Your response, data, and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information. For example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations, or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the United Kingdom's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

How to track the progress of a consultation

- 1. Find the web page for the call for input you would like to receive updates on.
- 2. Click 'Get emails about this page', enter your email address and click 'Submit'.
- 3. You will receive an email to notify you when it has changed status.

A consultation has three stages: 'Open', 'Closed (awaiting decision)', and 'Closed (with decision)'.

2. Norwich to Tilbury Early Construction Funding assessment

This section sets out NGET's ECF application and our minded-to position.

Questions

- Q1. Do you agree with our minded-to position to provide ECF for the project?
- Q2. Do you agree with our proposed modification to adjust ASTIAt in Appendix 1 of SpC 3.41?

Brief description of the project

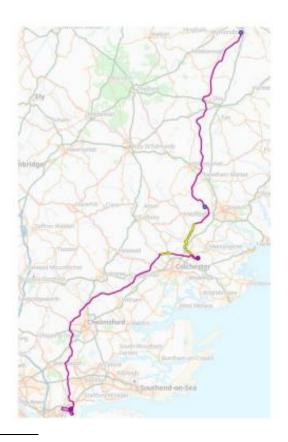
- 2.1 The Norwich to Tilbury construction project is comprised of the Northeast Anglia (AENC) and Southeast Anglia (ATNC) reinforcements and was formerly progressed under the Large Onshore Transmission Investments (LOTI) re-opener.
- 2.2 AENC and ATNC have been approved for inclusion in our ASTI framework because the network reinforcements they proposes are crucial for the safe, resilient and efficient transmission of electricity through the energy system. These reinforcement will also help alleviate constraint costs that the consumer is currently billed for. The needs case and benefits of these projects have been set out in NESO's Network Options Assessment 2021-228 and the Holistic Network Design⁹.
- 2.3 Norwich Tilbury is part of a coordinated design of projects to create a regional solution to enable the efficient transmission of large volumes of power from the east of England. Both AENC and ATNC have been identified as essential network enhancements in NESO's clean power 2030 report¹⁰. The report also recommends that the construction project be accelerated in order to meet the Government's goals of reaching clean power by 2030.
- 2.4 The Norwich to Tilbury project consists of the following:
 - Approximately 180km of new 400kV electricity transmission connection from Norwich Main Substation to Tilbury Substation via Bramford Substation.
 - New East Anglia Connection Node (EACN) and Tilbury North 400kV
 Substations. The former is proposed to be an Air Insulated Switchgear (AIS) substation, and the latter to be a Gas Insulated Switchgear (GIS) substation.

⁸ Network Options Assessment Refresh 2021-22

⁹ <u>A Holistic Network Design for Offshore Wind | National Energy System Operator</u>

¹⁰ NESO Clean Power 2030

- Modification works to connect into the existing Norwich Main Substation and a substation extension at the existing Bramford Substation.
- Approximately 159km of new overhead line (OHL) transported with approximately 509 pylons, which will either be standard steel lattice pylons, low height stell lattice pylons, or gantries.
- Approximately 21km of 400kV underground cabling, partly located in the Dedham Vale National Landscape.
- Up to seven new Cable Sealing End Compounds (CSECs) to connect the overhead lines to the underground cables.
- Modifications to the existing National Grid Electricity Transmission (NGET)
 OHL to facilitate the connection of the existing network into the new Tilbury
 North Substation to provide connection to the Tilbury Substation.
- 2.5 The project currently has an operational date of 2031 but NOA identified that its earliest in service date can be 2030¹¹. NESO's Clean Power 2030 report shows significant constraint costs in 2030 if the project is not accelerated¹². NGET has committed to delivering the project as early as possible.



¹¹ Network Options Assessment Refresh 2021-22

¹² NESO Clean Power 2030 Annex 2 - Networks, Connections and Network Access Analysis

Figure 1: Proposed project route

ECF application

2.6 In September 2025, NGET made an application for ECF under Part C of SpC 3.41 of their licence to enable funding of early construction activities for the project. These activities are early enabling works, and early procurement commitments. Table 1 below outlines the total percentage against the original project cost estimate set in December 2022 and against the projected cost in today's estimates.

Norwich Tilbury (AENC/ATNC)	Total percentage of requested ECF, including previously approved ECF	Percentage requested in this ECF submission	
Percentage of AENC against total project forecast cost as originally set out in the NGET licence	2.93%	63%	
Percentage of ATNC against total project forecast cost as originally set out in the NGET licence	n/a	39%	
Percentage of the whole project against total project forecast cost as originally set out in the NGET licence	45.7%	45%	
Percentage of the whole project as translated against updated total project cost according to current estimates	23.2%	22.7%	

Table 1: requested ECF percentage

- 2.7 As part of this ECF application, NGET has confirmed to Ofgem that the current total project forecast cost is higher than the total forecast project cost listed in the ASTI Confidential Annex of NGET's licence. NGET explained that the cost is driven by scope refinement and further project development, and they have completed backchecks confirming similar or higher cost increases for strategic alternatives.
- 2.8 As a result of the higher forecast project cost total, this ECF request makes up 45% of the forecast project cost originally set in the NGET licence. This translates to 22.7% of the updated forecast project cost.
- 2.9 We have accounted for the previous ECF request in our analysis of this application. We note that NGET annot receive funding for the same activity twice and the activities considered as part of this ECF complement and do not duplicate works permitted under the existing ECF decision.
- 2.10 The ECF funding considered in this consultation would allow NGET to carry out the activities that we consider to be in the consumer's interest, and will help to accelerate delivery of the project. This would be awarded ahead of a full Project Assessment (PA), where we will complete a full cost assessment and assess the efficiency of the project spend.
- 2.11 In the event of cancellation, the project will still be subject to a PA to ensure only efficient costs are recovered. Any unspent ECF will be returned to the consumer.
- 2.12 The activities identified by NGET fall within the permitted activity categories as set out in the ASTI guidance¹³ and are set out below:

Strategic land purchases

- Land purchase
- Easement and land options

Early Enabling Works

- Great Grid Partnership (GGP) early enabling works
- UK Power Network (UKPN) third-party utility diversions
- Openreach third-party utility diversions
- Road widening works
- Programme management resources

¹³ Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document.pdf

Logistic and storage hubs

Early Procurement Commitments

- Road aggregate
- OHL structures, conductor and fittings
- Gas Insulated Switchgear (GIS)
- Air Insulated Switchgear (AIS)
- Protection and Control Systems
- Boundary Fencing
- HV Cable and Accessories

Other – costs associated with Biodiversity Net Gain requirement.

Strategic land purchase

Activities proposed

2.13 NGET is proposing to fully acquire the land needed for the proposed site for the ATNC substation. NGET is also proposing to secure land option agreements to secure access for OHL structures and cables.

Consumer benefit and protections in place

- 2.14 NGET intends to seek voluntary agreements rather than rely on the compulsory acquisition powers that would come following a DCO. This would allow more time and flexibility for both NGET and the landowers and ensure a solution that delivers an optimal outcome for both parties.
- 2.15 NGET has explained that early purchase benefits the consumer by preventing potential increases in cost, which are likely to materialise in the event of a delay. NGET has advised that a delay could result in a higher cost caused by increased legal fees, injurious affection claims, and higher compensation due to contested access if someone else purchases the land for other purposes.
- 2.16 Additionally, early acquisition of the land will avoid unnecessary delays if the project secures Development Consent Order as set out in its DCO application. If the land is already available, this would allow for more flexibility in the design of the substation.
- 2.17 Due to the large scale of this project and the number of landowners involved, there are benefits to early advancement of land option agreements. It will enable phased access for further surveys and allow prompt access for construction, should the DCO be granted. This approach prioritises early engagement with

- landowners and reduces the risk of delays and higher costs associated with the use of compulsory acquisition powers.
- 2.18 NGET has provided assurances that in the event of project cancellation, the purchased land can be resold at market prices, with the money returned to the consumer. This activity would therefore pose a low risk of the consumer incurring financial loss.
- 2.19 Option agreements would represent a greater risk to the consumer in the event of project cancellation, as the spend is not recoverable. NGET has committed to limiting the risk to the consumer as much as possible with the following mitigations:
 - Where possible, payments will be made in structured instalments aligned with key project milestones. This ECF would grant only 25% of the funding required for easement payments under option agreements to ensure that payments reflect actual progress and readiness.
 - Where paying in instalments is not possible, such as for CSECs and Tilbury North, NGET is confident that the agreements can be repurposed for future infrastructure projects or long-term network development.
- 2.20 We agree that there are benefits to the early purchase of land for this project, such as reducing the risk of delays and providing higher degree of cost certainty. Additionally, it allows greater flexibility in the final substation layout and the alignment of OHL and underground cable entry points. This could potentially simplify civil works, reduce construction complexity and optimise the placement of key infrastructure. These opportunities may be lost if the land is subdivided or developed in the interim.
- 2.21 We are satisfied that the above activities meet the criteria for ECF, and that NGET have sufficient protections in place to limit consumer exposure to unnecessary costs.

Early enabling works

Activities proposed

- 2.22 NGET is proposing to commence a range of design, planning and early construction activities as part of the enabling works delivered through the Great Grid Partnership (GGP). It argues that these activities are essential to maintain the current delivery schedule and ensure readiness to begin construction, pending the decision of the DCO. The activities include:
 - Design and planning activities (detailed design and design assurance, offsite preassembly, work allocation package - Stage 2 Activities, construction and temporary works design, construction programme development)

- Early construction and preparation works (bellmouth and primary acess routes, utility mitigation, early compound set-up, straight overs (crossover bellmouths), consents, environmental inputs and design coordination for pre-DCO works, preparation and discharge consents)
- Surveys (archaeological, engineering, ground investigation surveys site access arrangements, pre-construction environmental surveys)
- 2.23 NGET is proposing activities to support design and construction works required from the local distribution network operator UK Power Network (UKPN). This includes undergrounding 11 sections of 132kV OHL and approximately 115 additional lower-voltage interactions. Part of the project intersects with existing UKPN infrastructure. Enabling works would include scheduling provisional outages, engaging with landowners and securing necessary materials, which have long lead times.
- 2.24 NGET is proposing activities to support the detailed design, specification and priority enabling works with Openreach. As with UKPN, some of this project intersects with a significant number of existing Openreach fibre optic cables and supporting infrastructure. To enable safe and unobstructed construction, these assets must be diverted or protected.
- 2.25 NGET is proposing to deliver approximately 2.5km of road widening, subject to a successful Town and Country Planning Application (TCPA). NGET explained that the road works are essential for accessing the East Anglia Connection Node (EACN) substation site and would allow for enabling works to be carried out ahead DCO decision. NGET state that the road widening works are critical for the acceleration fo the project to 2030.
- 2.26 NGET has requested funding for logistics mobilisation and storage as an alternative to the traditional approach of relying solely on compounds during the construction of the project. It intends to set up strategically located storage and logistic areas along the project route and develop a comprehensive logistics solution based on a logistics hub model to enable the efficient delivery of the activities included in this ECF. NGET has explained that the model reflects the complexity and scale of the project, and can keep transportation and other logistics costs down by maximising efficiency. Norwich Tilbury is NGET's largest onshore electricity transmission project, spanning c180km with multiple construction interfaces (overhead lines, substations, underground cabling) across numerous rural locations.
- 2.27 Compounds are usually designed for welfare and small-scale storage. Setting up the logistics hub solution will help NGET secure efficient access to site without the environmental impact of using more land for larger compounds. However,

- setting up this logistics hub solution in advance of the DCO outcome will require planning approvals, and engagement with relevant third parties and contractors.
- 2.28 The logistics hub model will support the receipt, storage and distribution of long-lead and high-volume materials in advance of construction mobilisation. Establishing this ensures materials are available when needed, reduces delivery interface risks, and avoids delays linked to procurement or storage once site access is granted. Given the long lead times of many items, they may need to be manufactured off-site in advance. Storage solutions therefore need to be available to ensure the quality of the products does not deteriorate and reduces the risk of theft.

Consumer benefit and protections in place

- 2.29 NGET argues that the activities carried out by GGP are essential to maintain the current delivery schedule and ensure readiness to begin construction, pending the decision of the DCO. NGET seeks to progress these activities early in order to mitigate delivery risks to the project. This will reduce uncertainty, improve design maturity, and ensure pre-construction activities can be properly coordinated ahead of full mobilisation. Some of the activities also have long lead times, require further third-party approvals or are governed by seasonal constraints.
- 2.30 The majority of the early enabling costs delivered through GGP are unique to the project and not recoverable. However, where possible, NGET will phase costs and will be able to scale them down quickly where a delay or cancellation risk materialises. NGET has stated that any material procurement and enabling construction prior to project assessment determination will be as limited as possible, and only carried out under governance procedures that assess cancellation risk.
- 2.31 Some of the work conducted by GGP partners may also be repurposed for other projects, subject to geographic and programme alignment. Where possible, site establishment materials could also be repurposed to other sites in the geographical area.
- 2.32 The enabling works conducted around UKPN and Openreach infrastructure are intended to mitigate the risk of delays, additional costs and last-minute interface issues. Delaying commercial arrangements would introduce delivery uncertainty and increase the risk of programme delay, increasing delivery costs by potentially paying premiums for urgent orders. The scope of recoverable funds in the event of project cancellation is limited, however NGET has put the following mitigations in place:
 - NGET have stated that a significant portion of the design and survey output work completed by UKPN can be repurposed by UKPN for future distribution network reinforcement or customer-driven works in the region. While this cost

- may not be immediately recoverable for the consumer, it will still provide a wider system benefit by supporting future distribution investment needs.
- Where items have long lead times, NGET have committed to ensuring contractual arrangements allow for the transfer or repurposing of materials to other UKPN capital programmes, or other NGET projects.
- NGET have phased the delivery of works conducted by Openreach, prioritising activities with the greatest impact on programme delivery and, where possible, scheduling work to avoid unnecessary spend in areas that may be subject to late-stage scope changes.
- 2.33 The road widening works proposed by NGET are a key for supporting other early enabling works and will be required for the acceleration of the project to 2030. A portion of these costs will be recovered from North Falls and Five Estuaries, subject to each project receiving its own DCO approval and investment approval to proceed. Early delivery would enable the works to be completed in a controlled and integrated way, reducing the cumulative peak impact of all projects on the community.
- 2.34 The logistics hub model will support the receipt, storage and distribution of long-lead and high-volume materials in advance of construction mobilisation. Establishing this ensures materials are available when needed, reduces delivery interface risks, and avoids delays linked to procurement or storage once site access is granted. Given the long lead times of many items, they may need to be manufactured off-site in advance. Storage solutions therefore need to be available to ensure the quality of the products does not deteriorate and reduces the risk of theft.
- 2.35 Ofgem understand the proposed logistics model to be a more economic option than the use of compounds to store products. There are additional benefits to local residents as NGET have assured us that this will increase the efficiency of transportation and construction works around the project, thus minimising disruption to local communities.
- 2.36 In the event of project cancellation, NGET assesses the risk of sunk costs related to logistics and storage to be low. The logistics hubs and associated assets can be repurposed for other projects required in the area, and assets can be re-sold. NGET has also committed to including contractual provisions in its contracts with third parties to further minimise consumer risks, as is the approach with other costs described in this ECF.

Early procurement commitments

Activities proposed

2.37 NGET is requesting funding to enable the procurement of critical substation and overhead line components required. The specific items NGET intends to procure are listed in para 2.12. Lead times for these items range from 55 to over 100 weeks, and securing production slots and initiating OEM-led design activities often requires deposits or capacity reservations 12 to 24 months in advance.

Consumer benefit and protections in place

- 2.38 The supply chain for transmission infrastructure is currently highly constrained with increasing prices and significantly greater lead times for critical assets. Capacity Reservation Agreements (CRA) are becoming increasingly common globally to secure contractor commitment and continued engagement on projects. Early procurement commitments for long-lead time items are essential to maintain delivery milestones and mitigate supply chain risks, ensuring the items are available at the time they are needed.
- 2.39 Delaying these procurement activities may jeopardise the achievement of 2030 delivery date, which analysis from the NESO CPP2030 report confirms would be detrimental to consumer interests.
- 2.40 There are financial benefits to completing these activities earlier, such as shielding the programme from potential supplier price increases or volatility. NGET would also be able to secure more favourable commercial terms by avoiding price premiums associated with urgent orders.
- 2.41 Early procurement of these items does carry some risk to the consumer in the event of project cancellation. NGET has put the following mitigations in place:
 - Since most early procurement items are standardised, they can be repurposed to other projects.
 - Where possible, NGET will work with suppliers to structure payment profiles that limit early financial commitment. This will include using milestone payments, which helps limit the financial risk to consumers because payments can be stopped if the project gets cancelled or delayed.
 - At any point in time, the total financial exposure is limited to the value of payments made up to that point.

GIS eligibility

- 2.42 While we accept that early procurement of GIS meets the eligibility criteria for ECF, this does not prejudge or fetter our discretion in relation to wider regulatory assessments.
- 2.43 We would expect to take account of the strength of justification provided ahead of final determinations when undertaking our efficiency assessment of the project at PA stage.

Other activities

Activities proposes

- 2.44 NGET is proposing to make advance payments on the purchase of biodiversity units (BUs) in order to meet their Biodiversity Net Gain (BNG)¹⁴ commitments.
- 2.45 From May 2026, BNG requirements under the Environment Act (2021) will come into effect, and require developers to deliver at least 10% BNG. The purpose of this is to reduce any negative impacts projects may have on biodiversity, and to ensure that the habitats for wildlife are left in a measurably better state than they were before the development.

Consumer benefit and protections in place

- 2.46 It is likely that an approved BNG strategy will be required before a DCO is accepted. We agree that securing a significant amount of the required BUs early demonstrates a credible BNG strategy and will help to avoid delays to the project, should this be delayed, which is we have permitted for BNG costs to be considered under the ECF category of "other".
- 2.47 NGET have assured us that the risk to exposing the consumer to additional costs in the event of project cancellation is low. While advance payments are not recoverable, the purchased BUs can be repurposed for other nearby projects.

Our minded-to position

- 2.48 In accordance with our ASTI Decision, and as explained in the ASTI guidance, we can consider ECF requests above 20% of total forecast project costs in exceptional circumstances as per paragraph 4.8 of the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document where the expenditure is justified and necessary to accelerate project delivery, or where not investing will increase the risk of project delay.
- 2.49 We are satisfied that the activities are eligible under the ECF guidelines, that they are in the consumers interest and will help to accelerate delivery of the project.
- 2.50 We are minded-to allow the full ECF spend requested by NGET, to commence the activities detailed in this document. The full ECF amount would represent 45% of total project forecast cost as set out in the NGET licence or 22.7% of updated costs, according to the estimates submitted by NGET alongside this ECF reqest. Compound with the ECF already approved for AENC, this would make the total ECF 45.7% of the licence cost or 23.2% of the current forecast cost.

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¹⁴ Biodiversity net gain - GOV.UK

- 2.51 We recognise that this is above the usual threshold of 20% of project costs.

 Overall, we are satisfied that there are sufficient protections in place to protect the consumer in the event of cancellation and that, on balance, it is in the consumer's interest to proceed with these activities.
- 2.52 NESO's current position is that the needs case and impact of this project remains as reported in the CP2030 report. We accept NESO's analysis that emphasises the importance of this project and the cost to the consumer should it be delayed beyond 2030. We are therefore minded to allow this ECF funding in order to assist acceleration of the project to 2030.
- 2.53 We expect NGET to take all reasonable steps to accelerate the project and ultimately ensure timely and successful delivery of the project. NGET has outlined that it is putting in place a range of consumer protections to mitigate consumer risks in the event the project was delayed, amended or cancelled. We will therefore expect NGET to ensure that consumer risks in every scenario are kept as low as practical, including through negotiations with its suppliers.

3. Conclusions and next steps

We have detailed our minded-to position to accept NGET's request for ECF for the Norwich to Tilbury project. We have summarised NGET's justification for the activities, as well as the associated consumer benefits and protections in place for each category. This decision is subject to consultation and may change as a result of evidence submitted in the consultation feedback. This consultation is strictly about the eligibility and risk mitigation impact of the proposed activities. We welcome responses from consumer groups, stakeholders impacted by the project, stakeholders with an interest in the costs of electricity transmission infrastructure, and Transmission Owners.

We note that the purpose of ECF is to enable permitted early construction activities prior to the project receiving planning consents and being finalised. The objective is to ensure that the network reinforcements required to deliver benefits to consumers begin construction at pace once relevant planning authorities reach a decision on the project.

We are not involved in any planning decisions, and awarding of ECF should not influence the outcome of the DCO process or any other consenting process. Feedback related to any aspect of NGET's DCO application will therefore not be forwarded to the relevant planning authorities. We encourage stakeholders to engage directly with the planning process, as this remains the most appropriate place to voice any comments on project design or scope.

Next steps

We welcome responses to our consultation on the specific questions we have included in Chapter 3. If you would like to respond to this document, then please send your responses to: MajorProjects.LTPD@ofgem.gov.uk. The deadline for responses is 20 December 2025. We aim to publish our ECF decision and the decision to modify NGET's licence in January 2026.

Send us your feedback

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this consultation. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Do you have any further comments?

Please send your feedback to stakeholders@ofgem.gov.uk.

Appendix 1. Notice of statutory consultation to modify SpC 3.41

To: National Grid Electricity Transmission Plc Electricity Act 1989 Section 11A(2)

Notice of statutory consultation on a proposal to modify the Special Conditions of the electricity transmission licence held by National Grid Electricity Transmission

- 1. The Gas and Electricity Markets Authority ('the Authority') proposes to modify the Special Conditions (SpC) of the electricity transmission licence held by National Grid Electricity Transmission Plc (NGET) granted or treated as granted under 6(1)(b) of the Electricity Act 1989 by amending an allowance value (ASTIAt) referenced in Appendix 1 (ASTI Price Control Deliverable) of SpC 3.41 (Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIRt)).
- 2. In line with SpC 3.41.10 and the Accelerated Strategic Investment Guidance and Submission Requirements Document, we are proposing this modification because we are satisfied that NGET's Early Construction Funding (ECF) application:
 - a. have provided clear and convincing justification for exceeding the 20% threshold of total forecasted project cost as set by SpC 3.41.8 and have demonstrated the appropriate balance between assisting acceleration and protecting consumers from potentially excessive cost exposure in the unlikely event that the projects do not progress;
 - b. was pre-empted by a notice in writing of NGET's intention to make the application under section 3.41.7 at least 8 weeks before NGET made the application; and
 - c. there is a clear justification for why it is in consumers' interests to provide funding for the proposed activities to take place ahead of our cost assessment as part of the PA process as the early construction activities will aid in accelerating project delivery.
- 3. The effect of the proposed modification is to adjust the allowances contained in the ASTI Confidential Annex as referenced in Appendix 1 (ASTIAt) of Special Condition 3.41 'Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIAt)' and to insert "ECF" into the "ECF/PA" column for SCD1 in Appendix 1 to SpC 3.41 in NGET's electricity transmission licence to allow NGET's ECF expenditure application. The proposed modification will be reflected in what will become the latest version, v1.1, of the ASTI Confidential Annex.
- 4. With the exception of the ASTI Confidential Annex, a copy of the proposed modification and other documents referred to in this Notice have been published on our website (www.ofgem.gov.uk). Alternatively, they are available

from information.rights@ofgem.gov.uk

- 5. The full text of the proposed modification to Appendix 1 of SpC 3.41 is set out below in Appendix 2 with the new text to be inserted shown double underscored. For reasons of commercial sensitivity, details of the amended allowance are confidential but will be issued to NGET in the updated ASTI Confidential Annex.
- 6. Any representations with respect to the proposed licence modification must be made on or before 20 December 2025 to: Thomas Johns, Office of Gas and Electricity Markets, 32 Albion Street, Glasgow, G1 1LH or by email to RIIOElectricityTransmission@ofgem.gov.uk and marked for the attention of Thomas Johns
- 7. We normally publish all responses on our website. However, if you do not wish your response to be made public then please clearly mark it as not for publication. We prefer to receive responses in an electronic form so they can be placed easily on our website.

8.	If we decide to make the proposed modification, it will take effect not less than
	56 days after the decision to modify the licence is published.

Thomas Johns

Deputy Director of Major Projects Delivery

Duly authorised on behalf of the Gas and Electricity Markets Authority

14 November 2025

Appendix 2. Special Condition 3.41

Deletions are shown in strikethrough and new text is double underlined.

Special Condition 3.41 Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIR_t)

Introduction

- 3.41.1 The purpose of this condition is to specify the value of the term ASTIR_t (the accelerated strategic transmission investment Re-opener term). This contributes to the calculation of the Totex Allowance.
- 3.41.2 The effect of this condition is to:
 - (a) specify the ASTI Outputs, delivery dates and allowances for the Price Control Deliverable;
 - (b) establish a Re-opener for the licensee to apply for an adjustment to the ASTI Outputs, delivery dates and allowances in Appendix 1 and the Minimum circuit availability standard after delivery in Appendix 2;
 - (c) provide for an assessment of the Price Control Deliverable; and
 - (d) establish the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document.
- 3.41.3 This condition also sets out the process the Authority will follow when making changes to Appendix 1 as a result of the Re-opener.

Part A: Formula for calculating the accelerated strategic transmission investment Re-opener term (ASTIR_t)

3.41.4 The value of ASTIR_t is derived in accordance with the following formula:

$$ASTIR_t = ASTIA_t - ASTIRA_t$$

where:

 $ASTIA_t$ means the allowances in Appendix 1; and

ASTIRA_thas the value zero unless otherwise directed by the Authority in accordance with Part G.

Part B: ASTI Outputs

3.41.5 The licensee must deliver the ASTI Outputs no later than 12 months after the delivery dates specified in Appendix 1.

3.41.6 After the ASTI Output has been delivered it must be operational and available for use by the ISOP for the period specified in Appendix 2 after application of the exclusions set out in Chapter 4 of the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document.

Part C: Early Construction Funding

- 3.41.7 The licensee may, in respect of any ASTI Output, apply for an Early Construction Funding decision to adjust ASTIA_t.
- 3.41.8 Unless the Authority directs otherwise, the aggregate allowances provided under paragraph 3.41.7 for any ASTI Output may not exceed 20% of the total forecast project cost listed in the ASTI Confidential Annex.
- 3.41.9 The licensee must notify the Authority in writing of its intention to make an application under 3.41.7 at least 8 weeks before making an application, unless the Authority directs otherwise.
- 3.41.10 A modification under this Part will be made under section 11A of the Act.

Part D: ASTI Project Assessment Decision

- 3.41.11 The licensee may, in respect of any ASTI, apply for an ASTI Project Assessment Decision and an associated modification of Appendices 1 and 2 to:
 - (a) specify or amend an ASTI Output, a delivery date and associated allowances; and
 - (b) specify the minimum circuit availability standard after delivery for the relevant ASTI Output.
- 3.41.12 Unless the Authority otherwise directs, the licensee may only apply for an ASTI Project Assessment Decision after submission of all material planning consent applications.
- 3.41.13 A modification under this Part will be made under section 11A of the Act.

Part E: ASTI Cost And Output Adjusting Event

- 3.41.14 The licensee may apply for a modification to the ASTI Outputs and allowances in Appendix 1 where it considers that there has been one or more ASTI Cost And Output Adjusting Event.
- 3.41.15 The licensee may only apply under this Part to modify allowances in Appendix 1 where:
 - (a) expenditure has been caused to increase or decrease by at least the percentage specified in, or in accordance with, paragraph 3.41.17, calculated before the application of the Totex Incentive Strength, relative to

the relevant allowance in Appendix 1 by the event or if there has been more than one event:

- i. by each event;
- ii. if the Authority has directed that the events in relation to the relevant ASTI Output should count cumulatively towards the percentage threshold,; and
- (b) the increase or decrease in expenditure is expected to be efficiently incurred or saved.
- 3.41.16 The licensee may apply under this Part to modify the ASTI Outputs in Appendix 1 only where there is a material change to the scope of the relevant ASTI project.
- 3.41.17 The percentage referred to in paragraph 3.41.15(a) is:
 - (a) 5%; or
 - (b) such other percentage as the Authority may specify by direction.
- 3.41.18 An application under this Part must be made in writing and must:
 - (a) include detailed supporting evidence that an ASTI Cost And Output Adjusting Event meeting the requirements set out in paragraphs 3.41.15, or where applicable 3.41.16, has occurred;
 - (b) set out the modifications requested to the ASTI Outputs or associated allowances in Appendix 1;
 - (c) explain the basis of the calculation for any proposed modification to the allowances in Appendix 1, which must be designed to keep, so far as is reasonably practicable, the financial position and performance of the licensee the same as if the ASTI Cost And Output Adjusting Event had not occurred; and
 - (d) include a statement from a technical adviser, who is external to and independent from the licensee, whether, considered in the context of the value of the ASTI Output, the proposed modification to the ASTI Output or associated allowances fairly reflects the effects of the ASTI Cost And Output Adjusting Event.
- 3.41.19 The Authority may make a modification under this Part where:
 - (a) there has been an application under this Part;
 - (b) there has been an ASTI Cost And Output Adjusting Event in relation to the relevant ASTI;
 - (c) the requirements of paragraphs 3.41.14 to 3.41.18, where applicable, have been met; and

- (d) the proposed modifications to Appendix 1 have the effect so far as is reasonably practicable of keeping the financial position and performance of the licensee the same as if the ASTI Cost And Output Adjusting Event had not occurred.
- 3.41.20 A modification under this Part will be made under section 11A of the Act.

Part F: Modification of delivery date in Appendix 1 further to an ASTI ODI Penalty Exemption Period decision or ASTI ODI Target Date decision under Part B of Special Condition 4.9 (Accelerated strategic transmission investment output delivery incentive)

- 3.41.21 The Authority will modify the delivery dates in Appendix 1 where it decides under Part B of Special Condition 4.9 (Accelerated strategic transmission investment output delivery incentive) to make a modification to the ASTI ODI Penalty Exemption Period or ASTI ODI Target Date in Appendix 1 of Special Condition 4.9.
- 3.41.22 A modification under this Part will be made under section 11A of the Act.

Part G: Assessment of the Price Control Deliverable (ASTIRAt)

3.41.23 The Authority will, in accordance with the assessment principles set out in Part A of Special Condition 9.3 (Price Control Deliverable assessment principles and reporting requirements), consider directing a value for ASTIRA_t where the licensee has not Fully Delivered an output in Appendix 1.

Part H: What process will the Authority follow in making a direction?

- 3.41.24 Before making a direction under Part G the Authority will publish on the Authority's Website:
 - (a) the text of the proposed direction;
 - (b) the reasons for the proposed direction; and
 - (c) a period during which representations may be made on the proposed direction, which will not be less than 28 days.
- 3.41.25 A direction in respect of Part G will set out:
 - (a) the delivery status of the ASTI Output that has not been Fully Delivered;
 - (b) the value of the ASTIR_t term and the Regulatory Years to which that adjustment relates; and
 - (c) the methodology and data that has been used to decide the delivery status and value of any adjustments to the ${\sf ASTIR}_t$ term.

Part I: Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document

- 3.41.26 The licensee must comply with the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document.
- 3.41.27 The Authority will issue and amend the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document by direction.
- 3.41.28 The Authority will publish the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document on the Authority's Website.
- 3.41.29 The Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document will make provision about the detailed requirements for Parts C, D, E and F.
- 3.41.30 The Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document will also make provision about the detailed requirements under Special Condition 3.40 (ASTI Pre-Construction Funding Re-opener, Price Control Deliverable and Use It Or Lose It Adjustment) and Special Condition 4.9 (ASTI output delivery incentive).
- 3.41.31 Before directing that the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document comes into effect, the Authority will publish on the Authority's Website:
 - (a) the text of the proposed Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document;
 - (b) the date on which the Authority intends the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document to come into effect; and
 - (c) a period during which representations may be made on the text of the proposed Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document, which will not be less than 28 days.
- 3.41.32 Before directing an amendment to the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document, the Authority will publish on the Authority's Website:
 - (a) the text of the amended Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document;
 - (b) the date on which the Authority intends the amended Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document to come into effect;

- (c) the reasons for the amendments to the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document; and
- (d) a period during which representations may be made on the amendments to the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document, which will not be less than 28 days.

Appendix 1

ASTI Price Control Deliverable

ASTI Output	Delivery Date	Allowance (ASTIAt, £m)	ECF/PA
New 400 kV double circuit in north East Anglia (NOA Code: AENC)	31 December 2031	Have the values given in the ASTI Confidential Annex.	ECF
New 400 kV double circuit in south East Anglia (NOA Code: ATNC)	31 December 2031	Have the values given in the ASTI Confidential Annex.	<u>ECF</u>
New 400 kV double circuit between Bramford and Twinstead (NOA Code: BTNO)	31 December 2029	Have the values given in the ASTI Confidential Annex.	
New 400 kV double circuit between Creyke Beck and the souh Humber (NOA Code: CGNC)	31 December 2031	Have the values given in the ASTI Confidential Annex.	
Eastern subsea HVDC link from Torness to Hawthorn Pit (NOA Code: E2DC)	31 December 2028	Have the values given in the ASTI Confidential Annex.	
Eastern Scotland to England link: Peterhead to Drax offshore HVDC (NOA Code: E4D3)	31 December 2030	Have the values given in the ASTI Confidential Annex.	

ASTI Output	Delivery Date	Allowance (ASTIAt, £m)	ECF/PA
Eastern Scotland to England 3rd link: Peterhead to the south Humber offshore HVDC (NOA Code: E4L5)	31 December 2031	Have the values given in the ASTI Confidential Annex.	
400 kV upgrade of Brinsworth to Chesterfield double circuit and Chesterfield to High Marnham double circuit. New High Marnham and Chesterfield 400 kV substations (NOA Code: EDEU)	31 December 2029	Have the values given in the ASTI Confidential Annex.	
New Chesterfield to Ratcliffe-on- Soar 400 kV double circuit (NOA Code: EDN2)	31 December 2031	Have the values given in the ASTI Confidential Annex.	
New 400 kV double circuit between the south Humber and south Lincolnshire (NOA Code: GWNC)	31 December 2031	Have the values given in the ASTI Confidential Annex.	
Uprate Hackney, Tottenham and Waltham Cross 275 kV to 400 kV (NOA Code: HWUP)	31 December 2028	Have the values given in the ASTI Confidential Annex.	ECF
New 400 kV double circuit between the existing Norton to Osbaldwick circuit and Poppleton and relevant 275 kV upgrades (NOA Code: OPN2)	31 December 2028	Have the values given in the ASTI Confidential Annex.	ECF
Pentir to Trawsfynydd cable replacement (NOA Code: PTC1)	31 December 2029	Have the values given in the ASTI Confidential Annex.	ECF

ASTI Output	Delivery Date	Allowance (ASTIAt, £m)	ECF/PA
North Wales reinforcement (NOA Code: PTNO)	31 December 2030	Have the values given in the ASTI Confidential Annex.	ECF
New Offshore HVDC link between Suffolk and Kent option 1 (NOA Code: SCD1)	31 December 2031	Have the values given in the ASTI Confidential Annex.	ECF
Eastern subsea HVDC Link from east Scotland to south Humber area (NOA Code: TGDC)	31 December 2031	Have the values given in the ASTI Confidential Annex.	
Tilbury to Grain and Tilbury to Kingsnorth upgrade (NOA Code: TKRE)	31 December 2029	Have the values given in the ASTI Confidential Annex.	ECF

Appendix 2

ASTI Output availability standard

Minimum circuit availability standard after delivery (%)

ASTI Output	0-6m	6-12m	12-24m
New 400 kV double circuit in north East Anglia (NOA Code: AENC)			
New 400 kV double circuit in south East Anglia (NOA Code: ATNC)			
New 400 kV double circuit between Bramford and Twinstead (NOA Code: BTNO)			
New 400 kV double circuit between Creyke Beck and the south Humber (NOA Code: CGNC)			
Eastern subsea HVDC link from Torness to Hawthorn Pit (NOA Code: E2DC)			
Eastern Scotland to England link: Peterhead to Drax offshore HVDC (NOA Code: E4D3)			
Eastern Scotland to England 3rd link: Peterhead to the south Humber offshore HVDC (NOA Code: E4L5)			
400 kV upgrade of Brinsworth to Chesterfield double circuit and Chesterfield to High Marnham double circuit. New High Marnham and Chesterfield 400 kV substations (NOA Code: EDEU)			
New Chesterfield to Ratcliffe-on-Soar 400 kV double circuit (NOA Code: EDN2)			
New 400 kV double circuit between the south Humber and south Lincolnshire (NOA Code: GWNC)			
Uprate Hackney, Tottenham and Waltham Cross 275 kV to 400 kV (NOA Code: HWUP)			

ASTI Output	0-6m	6-12m	12-24m
New 400 kV double circuit between the existing Norton to Osbaldwick circuit and Poppleton and relevant 275 kV upgrades (NOA Code: OPN2)			
Pentir to Trawsfynydd cable replacement (NOA Code: PTC1)			
North Wales reinforcement (NOA Code: PTNO)			
New Offshore HVDC link between Suffolk and Kent option 1 (NOA Code: SCD1)			
Eastern subsea HVDC Link from east Scotland to south Humber area (NOA Code: TGDC)			
Tilbury to Grain and Tilbury to Kingsnorth upgrade (NOA Code: TKRE)			

Privacy policy

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, "Ofgem"). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

Information: Include here all organisations outside Ofgem who will be given all or some of the data. There is no need to include organisations that will only receive anonymised data. If different organisations see different set of data then make this clear. Be a specific as possible.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for (be as clear as possible but allow room for changes to programmes or policy. It is acceptable to give a relative time e.g. 'six months after the project is closed')

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data

- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- · ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at https://ico.org.uk/, or telephone 0303 123 1113.
- **7. Your personal data will not be sent overseas** (Note that this cannot be claimed if using Survey Monkey for the consultation as their servers are in the US. In that case use "the Data you provide directly will be stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in term of data protection will not be compromised by this".
- 8. Your personal data will not be used for any automated decision making.
- **9. Your personal data will be stored in a secure government IT system.** (If using a third party system such as Survey Monkey to gather the data, you will need to state clearly at which point the data will be moved from there to our internal systems.)
- **10. More information** For more information on how Ofgem processes your data, click on the link to our "ofgem privacy promise".