

Decision

Accelerated Strategic Transmission Investment: Material Scope Change and Early Construction Funding - EGL3, EGL4 and GWNC

Publication date:	09 December 2025
Contact:	Jon Sharvill, Principal Policy Expert
Team:	Major Projects Delivery
Email:	MajorProjects.LTPD@ofgem.gov.uk

Following our consultation in September 2025,¹ this document outlines our decision on the request from the Transmission Owners (TOs) to update ASTI Outputs, ASTI ODI Target Dates and funding arrangements for three Accelerated Strategic Transmission Investment (ASTI) projects following a Material Scope Change (MSC) to the original network design:

- Eastern Green Link 3 (EGL3): Eastern Scotland to England 3rd link Peterhead to West Norfolk offshore HVDC
- Eastern Green Link 4 (EGL4): Eastern subsea HVDC link from East Scotland to West Norfolk
- Grimsby to Walpole (GWNC): New 400kV double circuit between South Humber and West Norfolk

This document also confirms our decision on the provision of Early Construction Funding (ECF) in respect of EGL3 and EGL4 and the recalibration of Pre-Construction Funding (PCF) for all three ASTI projects.

This decision is taken in line with the TOs' electricity transmission licences, Special Condition (SpC) 3.41 'Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIRt)'.

This document outlines our consultation position, the responses to the consultation, our view of the responses and our final decision. Non-confidential responses are published alongside this decision.

¹ [Accelerated Strategic Transmission Investment: Material Scope Change and Early Construction Funding - EGL3, EGL4 and GWNC | Ofgem](#)

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1 Introduction

Section summary

This section provides background information regarding the regulatory framework and an overview of our decisions on the Material Scope Changes (MSCs) to large onshore electricity transmission projects. It also provides links to documents related to the decision, explains the decision-making process and timelines for next steps.

Background

- 1.1. In 2022 the government set out its ambition in the British Energy Security Strategy to connect up-to 50GW of offshore generation to the electricity network by 2030.
- 1.2. In December 2022 we decided to introduce a new regulatory approval and funding framework for onshore transmission projects required to deliver the government's 2030 offshore wind ambitions, known as the Accelerated Strategic Transmission Investment (ASTI) framework.
- 1.3. The ASTI framework includes an Output Delivery Incentive (ODI) that either rewards the TOs for each day an ASTI project is delivered earlier than the ASTI ODI Target Date or penalises them for each day an ASTI project is delivered later than the ASTI ODI Target Date. Under ASTI, the TOs also have a Licence Obligation (LO) to deliver the projects no more than 12 months later than the ASTI ODI Target Date.
- 1.4. For further information regarding the ODI and LO, and further general background to this decision, please see our consultation document² along with Chapter 7 of our ASTI decision document³ and the ASTI Guidance and Submission Requirements Document (ASTI Guidance).⁴

² [Accelerated Strategic Transmission Investment: Material Scope Change and Early Construction Funding - EGL3, EGL4 and GWNC | Ofgem](#)

³ [Decision on accelerating onshore electricity transmission investment | Ofgem](#)

⁴ [Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document.pdf](#)

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MSCs under ASTI

- 1.5. The ASTI Guidance states that ‘where there are significant changes to the scope of an ASTI project which means the delivery date is no longer considered achievable, we will consider whether there is sufficient evidence to suggest that it is appropriate to update the ASTI ODI Target Date through a Section 11A licence modification’ and that ‘if we agree that (the project) is suitable for funding under ASTI, we will consider setting a new ASTI Output and setting a new ASTI ODI Target Date’.
- 1.6. In November 2024, the TOs made requests for the ASTI Outputs and ASTI ODI Target Dates in their Licences to be modified following an MSC impacting the outputs and delivery dates of the following projects:
- EGL3⁵: Eastern Scotland to England 3rd link: Peterhead to West Norfolk offshore HVDC
 - EGL4⁶: Eastern subsea HVDC link from East Scotland to West Norfolk
 - GWNC: New 400kV double circuit between South Humber and West Norfolk

ASTI funding

- 1.7. In September 2024, in line with SpC 3.41.9⁷ and the ASTI Guidance,⁸ the EGL3 Joint Venture (JV) submitted the required minimum eight-week advance notice of intention to make an ECF application regarding EGL3. The formal Early Construction Funding (ECF) application was made by the EGL3 JV⁹ on 11 October 2024 with an updated submission provided to Ofgem on 31 July 2025.

⁵ This project is referenced as E4L5 in the Holistic Network Design, however, is referred to by the TOs, and throughout this document, as EGL3

⁶ This project is reference as TGDC in the Holistic Network Design, however, is referred to by the TOs, and throughout this document, as EGL4

⁷ [Licences and licence conditions | Ofgem](#) Electricity licences and conditions, Transmission Licence, Special Conditions

⁸ [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

⁹ EGL3 JV is used in this document to refer to the Joint Venture (JV) between NGET and SHET to deliver EGL3.

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- 1.8. Similarly, in September 2024 the EGL4 JV¹⁰ also submitted notice that they intended to make an ECF application in respect of EGL4. The application was made on 2 September 2024 with an updated ECF application submitted on 11 July 2025.
- 1.9. In November 2024, alongside the MSC requests, the TOs provided their proposal for recalibrating Pre-Construction Funding (PCF) allowances to reflect the revised scope and costs of the three ASTI projects. This approach would include updates to SpCs 3.15 and 3.40 to implement revised PCF values for all three projects. It also proposed a change in regulatory treatment for the PCF element of EGL3 and GWNC, which prior to the establishment of ASTI had already received PCF via the SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCFt and PCFREt). The proposal was to move the funding and outputs from SpC 3.15 into SpC 3.40 Accelerated strategic transmission investment Pre-Construction Funding Re-opener, Price Control Deliverable and Use It Or Lose It Adjustment (APCFt).
- 1.10. Following our assessment of information provided by the JVs as part of their MSC request, in September 2025 we consulted¹¹ on our minded-to position. Specifically, we consulted on updating the ASTI Outputs and ASTI ODI Target Dates for EGL3, EGL4 and GWNC as well as our proposed approach for the provision of PCF for the three ASTI projects and ECF in respect of EGL3 and EGL4 only.
- 1.11. The chapters below summarise the stakeholder views in response to our consultation and detail Ofgem's consideration of these views, which informed our policy decision on the MSC in chapters 2 and 3, and the ECF and PCF decisions in chapters 4, 5 and 6.

¹⁰ EGL4 JV is used in this document to refer to the Joint Venture (JV) between NGET and SPT to deliver EGL4.

¹¹ [Accelerated Strategic Transmission Investment: Material Scope Change and Early Construction Funding - EGL3, EGL4 and GWNC | Ofgem](#)

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Decision

- 1.12. This document details our decision to update ASTI Outputs, ASTI ODI Target Dates, and PCF/ECF funding arrangements for EGL3, EGL4 and GWNC following MSCs.
- 1.13. This document confirms our decision to move the PCF allowances for EGL3 and GWNC from the Large Onshore Transmission Investment (LOTI) mechanism (under condition SpC 3.15) to the ASTI framework (under condition SpC 3.40). We are also recalibrating the ASTI PCF allowances for EGL3, EGL4 and GWNC in line with our decision to approve the MSC as set out in chapter 3 of this document.
- 1.14. This document also confirms our decision to adjust the allowances set out in Appendix 1 of SpC 3.41 'Accelerated strategic transmission investment Reopener and Price Control Deliverable term (ASTIAt)' in the TOs' Licences to allow the JVs to receive the requested amounts of ECF for EGL3 and EGL4.

Our decision-making process

- 1.15. Our consultation opened on 11 September 2025 and closed on 9 October 2025. We received eight responses to the consultation. Three were from the incumbent TOs, two were from members of the public, and three from transmission industry participants. The non-confidential responses have been published on our website.
- 1.16. In addition to the consultation, we have held regular meetings with the TOs to review and scrutinise the MSC requests. We also established a supplementary questions process following the ECF submission in July 2025 where the TOs were required to provide further information and evidence to further justify their ECF requests.
- 1.17. We have also sought feedback from the TOs on the proposed licence amendments which will be included as part of the statutory licence modification consultation for RIIO-3, due to be published in December 2025.

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Decision-making stages

Stage 1	Stage 2	Stage 3	Stage 4
Consultation opened	Consultation closed (awaiting decision)	Responses reviewed and published	Decision
11 September 2025	09 October 2025	October - November 2025	09 December 2025

Table 1: Decision making stages

Next steps

- 1.18. Based on our recent engagement with the EGL3 JV and EGL4 JV, we expect to receive requests to submit ASTI Project Assessments (PA) towards the end of 2027. We will undertake a full cost assessment, including ECF costs, at the PA stage and review whether ECF expenditure was efficient at this point.
- 1.19. On 14 November 2025 we published our consultation on the ECF request for GWNC. This consultation closes on 20 December 2025 and we expect to publish our decision in early 2026.¹²

Licence modifications

- 1.20. To give effect to our decision, we propose to amend the following licence conditions:
- SpC 3.40 Accelerated strategic transmission investment Pre-Construction Funding Re-opener, Price Control Deliverable and Use It Or Lose It Adjustment (APCfT)
 - SpC 3.41 Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIRt)

¹² [NGET portfolio for six construction projects: Early Construction Funding | Ofgem](#)

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- SpC 4.9 Accelerated strategic transmission investment output delivery incentive (ASTIIt)

1.21. These proposed modifications will be consulted on formally as part of the statutory licence modification consultation for RIIO-3, which will be published in December 2025.

Context and related publications

The following documents are relevant to this consultation:

- Material Scope Change Consultation: [Accelerated Strategic Transmission Investment: Material Scope Change and Early Construction Funding - EGL3, EGL4 and GWNC | Ofgem](#)
- ASTI decision: [Decision on accelerating onshore electricity transmission investment | Ofgem](#)
- ASTI licence modification decision: [Decision to modify the special licence conditions in the electricity transmission licences: Accelerated Strategic Transmission Investment | Ofgem](#)
- ASTI Guidance and Information Submissions Requirement Document: [Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document](#)
- British Energy Security Strategy: [British energy security strategy - GOV.UK](#)
- Holistic Network Design: [A Holistic Network Design for Offshore Wind | National Energy System Operator](#)
- NESO Beyond 2030 report: [Beyond 2030 | National Energy System Operator](#)
- Clean Power 2030 Action Plan: [Clean Power 2030 Action Plan - GOV.UK](#)
- Transitional Centralised Strategic Network Plan 2: [Transitional Centralised Strategic Network Plan \(tCSNP\) | National Energy System Operator](#)
- Transmission Acceleration Action Plan: [Electricity networks: transmission acceleration action plan - GOV.UK](#)

2 Summary of consultation position for the Material Scope Change request: EGL3 / EGL4 / GWNC

Section summary

This chapter summarises the purpose of each of the projects, the reasons for the MSC requests being made, and our consultation position.

Brief description of the projects

- 2.1. EGL3 is a High-Voltage Direct Current (HVDC) transmission project that will connect Peterhead in Aberdeenshire, Scotland, to a new Walpole B substation in West Norfolk, England. EGL3 is designed to deliver up to 2GW of transmission capacity via a combination of subsea and onshore HVDC and High-Voltage Alternating Current (HVAC) cables, supported by converter stations at each end.
- 2.2. EGL4 is a HVDC transmission project that will connect Westfield in Fife, Scotland, to the same proposed Walpole B substation in West Norfolk. It forms part of a coordinated effort in Great Britain to expand east coast transmission capacity. EGL4 comprises converter stations at both ends, subsea and onshore cable infrastructure, and shared landing and connection assets at Walpole. Once operational, EGL4 is expected to deliver up to 2GW of firm transmission capacity.
- 2.3. GWNC is a 400kV double circuit of approximately 140km of overhead lines (OHL) between Grimsby West and Walpole substations via Lincolnshire Connection Substation-A (LCS-A), Lincolnshire Connection Substation-B (LCS-B) and Weston Marsh substation. This integrated network reinforcement creates a better coordinated and holistic Grimsby to Walpole project compared to the original design.
- 2.4. EGL3, EGL4 and GWNC are key Net Zero projects that will contribute towards the government's objective to decarbonise the electricity networks. The current electricity transmission network has insufficient capacity to accommodate expected increases in renewable generation and customer demand, and to avoid consumers being exposed to material constraint costs, additional network

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capacity is required. These projects provide high-capacity, low-loss transmission circuits that will alleviate network constraints and enable the integration of large-scale offshore wind generation from Scottish waters. Further detail regarding these projects is included in our consultation to this decision.¹³

Material scope changes

- 2.5. Due to evolving system needs, an increase in customer demand, environmental factors and potential consenting challenges delivering the original Holistic Network Design (HND) recommended by NESO, TOs have developed an alternative proposed network design around Lincolnshire which requires MSCs to EGL3, EGL4 and GWNC.
- 2.6. Under the new network design, the location of the onshore connection point for EGL3 and EGL4 has moved from the Lincolnshire Connection Node (LCN) to a new Walpole B substation in Norfolk, England. The design of GWNC has also changed, with the original HND recommendation for a 400kV OHL double circuit between South Humber and South Lincolnshire replaced with a new route from Grimsby West to Walpole via a series of new substations, including Weston Marsh and the LCN.
- 2.7. TOs' deterministic delivery dates based on their updated programme delivery assumptions for GWNC, EGL3 and EGL4, and also the TO-proposed ODI Target Dates (set on the basis of the P50¹⁴ dates assumed in their Quantified Schedule Risk Analysis (QSRA)) are listed below in Table 2:

Project	Deterministic delivery date	P50 date based on QSRA	Proposed ASTI ODI Target Date
GWNC	09 Feb 2034	9 Oct 2034	31 Dec 2034

¹³ [Accelerated Strategic Transmission Investment: Material Scope Change and Early Construction Funding - EGL3, EGL4 and GWNC | Ofgem](#)

¹⁴ A forecast date that statistical analysis suggests has a 50% probability of being achieved, meaning there is an equal chance that actual delivery will occur earlier or later than this estimate.

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Project	Deterministic delivery date	P50 date based on QSRA	Proposed ASTI ODI Target Date
EGL3	13 Dec 2033	22 Dec 2034	31 Dec 2034
EGL4	13 Dec 2033	1 Dec 2034	31 Dec 2034

Table 2: Project delivery estimates and proposed ASTI ODI Target Dates

MSC consultation position

2.8. In the consultation we stated our support for the revised network design around the Lincolnshire area. We recognised that the proposed options have been tested and recommended by NESO, and that NESO's Cost Benefit Analysis (CBA) indicates a £3-6 billion benefit to consumers compared to the original network design, based on the TOs' central case assumptions.

2.9. In our minded-to-position, we proposed setting new ASTI Outputs and ASTI ODI Target Dates as listed below in Table 3:

Project	Description	ODI Target Date	Delivery Body
GWNC	New 400kV double circuit between South Humber and West Norfolk	31 Dec 2033	NGET
EGL3	Eastern Scotland to England 3rd link: Peterhead to West Norfolk offshore HVDC	31 Dec 2033	NGET/SSE
EGL4	Eastern subsea HVDC link from East Scotland to West Norfolk	31 Dec 2033	NGET/SPT

Table 3: Proposed ASTI Outputs and ASTI ODI Target Dates

2.10. We noted that EGL3, EGL4 and GWNC were among the more challenging projects to deliver within the original ASTI framework with the ODI Target Dates originally set equal to their respective Earliest In Service Dates (EISDs). Therefore, it was our view that reverting to the P50 2034 dates following the

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scope change, as requested by the TOs, would unfairly tip the balance of the overall ASTI incentive regime in favour of the TOs at a cost to consumers.

- 2.11. We did not propose changing the daily reward/penalty value under the ASTI ODI and considered that the LO on the TOs to deliver ASTI projects no later than 12 months after the ODI Target Date remained appropriate, as this would maintain the same consumer protections and requirements on the TOs as the ASTI framework did from the outset.
- 2.12. Our view, and intention, was that our proposed ODI Target Dates and LO dates for EGL3, EGL4 and GWNC would represent the same degree of challenge and not put TOs at any greater risk of being penalised through the ODI or being in licence breach than when ASTI was first introduced.

3 Response to the consultation and decision on Material Scope Change request: EGL3 / EGL4 / GWNC

Section summary

This chapter summarises consultation feedback on the MSC requests for EGL3, EGL4, and GWNC and Ofgem’s consideration of the consultation responses. It also sets out our decision on the MSC requests and our rationale behind the decision.

Consultation questions

- Q1. Do you agree with the revised network design in the Lincolnshire area?
- Q2. Do you agree with the TOs’ proposal to set ODI Target Dates at the end of 2034 based on their Quantified Schedule Risk Analysis?
- Q4. Do you agree with our proposal to set revised ODI Target Dates at the end of 2033?
- Q5. When setting a new date as part of a material scope change should we prioritise ensuring that the new date represents a “fair bet” for the TOs delivering the project, or the date maintains an overall fair balance of risk across their portfolio of projects?

- 3.1. Overall, respondents were broadly supportive of the revised network design. TOs argued in favour of a December 2034 ASTI ODI Target Date based on QSRA analysis, whereas industry stakeholders favoured a 2033 date which they considered better aligned with consumer interests, Net Zero goals and with connection offers for offshore wind generators.

Q1: Do you agree with the revised network design in the Lincolnshire area?

High level summary of responses:

- 3.2. Six responses were received for Q1: three from TOs, two from offshore industry members (a generator and a generator/developer), and one from an individual. All respondents broadly supported the revised network design in Lincolnshire, although one industry member expressed disappointment with the need for the redesign. TOs stated that the changes were optimal for the region and that ASTI projects maintained strong consumer value despite increased costs.

Ofgem view:

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- 3.3. We maintain our consultation position that, as supported by NESO's Impact Assessment, the new design should deliver more benefit to consumers. There were no concerns raised with the proposed regional configuration around Lincolnshire and no information provided in response to the consultation to make us reconsider our consultation position to support the MSC to EGL3, EGL4 and GWNC, as proposed by the TOs.

TO response:

- 3.4. TOs highlighted that these changes to the scope of the projects will have significant impacts on risk, cost, and delivery timing, including a need for EGL3 and EGL4 to be commissioned sequentially - as commissioning each project in tandem would pose too great of a risk to system stability. In particular, they argued that the significant increase in undergrounding, as well as the co-delivery of the southern landing point for each project, adds additional risk in comparison to the original design.

Ofgem view:

- 3.5. We note the additional costs required to deliver the revised scope of work and are satisfied that, despite these additional cost drivers, it is still in consumers' interests to deliver the proposed programme of work around Lincolnshire, as demonstrated by the cost-benefit analysis undertaken by NESO and submitted by the TOs in support of the MSC. We note the TO view that delivering the revised scope of work carries additional delivery risk in comparison to the original project designs due to the additional works required. While we accept there are some additional works that need to be undertaken compared to the original designs, which carry additional delivery risks, the target delivery date is being set materially later than the original 2030 dates to account for such works. Following further engagement with NESO we are also satisfied that EGL3 and EGL4 will need to be commissioned sequentially to allow for system testing and ensure that system stability is maintained. We recognise, following further engagement since the consultation, that EGL3 and EGL4 share the same critical path. As a result, the TOs cannot determine at this stage which project should be

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commissioned first. We agree with the TOs that the most sensible approach is to determine the commissioning sequence closer to the time, once project delivery timings are more precise.

Q2: Do you agree with the TOs' proposal to set ODI Target Dates at the end of 2034 based on their Quantified Schedule Risk Analysis?

Q4: Do you agree with our proposal to set revised ODI Target Dates at the end of 2033?

High level summary of responses:

3.6. Seven responses were received for Q2 and Q4: three from TOs in support of 2034 ASTI ODI Target Dates based on their Quantified Schedule Risk Analysis (QSRA), three from the offshore industry (one generator and two generator/developers) favouring 2033 ASTI ODI Target Dates, and one from an individual who did not give a clear preference for either of the two options. We have collated responses across these two questions as many of the views shared were repeated as they were relevant to both.

TO response:

3.7. The TOs view was that, in the absence of Ofgem guidance stating otherwise, QSRA is the most appropriate method for setting delivery dates post-MSA, which they argue aligns with government Teal Book recommendations.

Ofgem view:

3.8. We acknowledge that we have not set out explicit guidance on how ASTI ODI Target Dates will be recalibrated following MSAs. We disagree, however, that this means ASTI ODI Target Dates should be set at P50 using QSRA; this approach does not consider target date setting across the wider ASTI portfolio, nor delivery of the government's Net Zero ambitions. It also risks creating an incentive to rescope the more challenging projects in the ASTI portfolio. We consulted on what we considered to be an appropriate basis to set ASTI ODI Target Dates for EGL3, EGL4 and GWNC following the MSA and non-TO respondents were supportive of the principle that the new ASTI ODI Target Dates

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should not place the TOs in a more favourable position on a portfolio basis than when ASTI was first implemented. We acknowledge that the Teal Book recommends using QSRA for estimating project delivery timelines but disagree that this therefore means it should be the basis to set ASTI ODI Target Dates, given this would mean that at a portfolio level the ASTI ODI was no longer balanced. We also note that ASTI was introduced to facilitate the delivery of the government's 2030 Net Zero ambitions not to introduce a general project delivery incentive, and no other projects in the ASTI framework had their ASTI ODI Target Dates set using QSRA P50s.

TO response:

- 3.9. TOs proposed an ASTI ODI Target Date of 31 December 2034 which, based upon their QSRA, gives them a 50/50 (P50) balance of opportunity for reward or penalty. They argue the December 2034 date would still deliver benefits to consumers as the project design will be delivered earlier than the original design and provides greater system benefit.

Ofgem view:

- 3.10. We agree that this new design provides greater benefit versus the original design based on the TOs' delivery assumptions and NESO's CBA, and this holds true whether the ASTI ODI Target Date is set at 31 December 2033, as proposed in our consultation, or at 31 December 2034, as proposed by the TOs. These projects were required as part of the original HND for 2030 and we want them delivered as close to 2030 as possible to maximise consumer value. While there is still consumer value to delivering the projects by 2034 versus the original design (which TOs do not consider could be delivered by this date), this date is significantly later than when the project is optimally required by the system, and as such would still be at a cost to consumers due to the delay in addressing significant network constraints. We must consider what a fair and reasonable reward for TOs would be for delivering projects in 2034 that were originally required by 2030, particularly as the constraint cost impact of this delay is ultimately paid for by consumers. We note the TO view that their P50 date of 31

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December 2034 reflects an equal chance of earning a reward or penalty for EGL3, EGL4 and GWNC, however as per our consultation position, we retain the view that setting ASTI ODI Target Dates on a P50 basis now would mean the overall balance of the incentive at a portfolio level would shift in favour of TO rewards, which was not the intention when ASTI was introduced and we do not consider to be in the interests of consumers.

TO response:

- 3.11. TOs strongly opposed a 2033 ASTI ODI Target Date which their QSRA deemed as unachievable (P0) and rejected Ofgem's methodology which asserted that EISDs are comparable to deterministic dates used in the QSRA.

Ofgem view:

- 3.12. When ASTI was introduced the TOs were clear that the EISD represented the earliest date a project could be delivered if no major risks materialised. We acknowledge that the proposed deterministic dates for EGL3, EGL4 and GWNC may be more robust than the original EISDs given the greater project maturity and understanding of delivery timelines. However, we have not seen evidence or explanation from the TOs that convincingly explains that there should be distinction between the two terms nor why it is unreasonable to consider the deterministic date as a proxy for the EISD. We also question the QSRA output that suggests that it is impossible (P0) that these projects could be delivered by their deterministic dates. The deterministic date was based on existing benchmark data and TOs' own in-house experience, and although the timeline assumptions used were generally lower than the averages from historical benchmarks, the analysis did not model the fastest possible delivery scenarios, nor did the QSRA model any acceleration opportunities. Through further engagement with the TOs they have also acknowledged that it is not impossible to deliver the projects by their deterministic dates and there is some potential to outperform these dates and earn rewards through the ASTI ODI. While in general the TOs approach to the QSRA appears reasonable, we have remaining concerns around the suitability of relying on TO QSRA information for setting delivery dates

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for TO projects since they rely upon in-house TO assumptions that have not been independently verified.

TO response:

- 3.13. TOs argued that Ofgem had not provided any quantitative evidence to support the claim that the original ODI Target Dates were set on a portfolio basis. They say that at the time of setting ASTI, Ofgem acknowledged that these projects would require MSCs and Ofgem therefore could not have assessed that the original ODI was balanced because these original dates were known to be uncertain/subject to change.

Ofgem View:

- 3.14. All TOs were involved in the development of the ASTI framework, and the portfolio aspect of the framework was discussed, and supported by TOs at the time. Ofgem did not undertake quantitative analysis to ensure that the original portfolio was balanced; the balance was based on qualitative factors, principally that there was a mix of projects – some with challenging dates to be hit (EISD or earlier) and others (the majority) with less challenging dates required, and the TOs signed up to ASTI in full knowledge of this. Our 2023 ASTI Licence Decision¹⁵ acknowledges the rationale for the proposed changes to these three projects, it does not however guarantee or assure that there would be a change to the ASTI ODI Target Date, nor that such a date would be reset to an updated P50 date.

TO response:

- 3.15. TOs also argued that setting a LO delivery date at P50 (31 December 2034) would expose them to a greater than 50% risk of licence breach, which they consider unreasonable and misaligned with ASTI principles. TOs suggested that unrealistic ASTI ODI Target Dates could limit innovation and create perverse incentives, deterring future MSCs that are in consumers' interests due to fear of penalties.

¹⁵ [Decision to modify the special licence conditions in the electricity transmission licences Accelerated Strategic Transmission Investment.pdf](#) Paragraph 4.17

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Ofgem view:

- 3.16. Notwithstanding concerns around our ability to assure the delivery and risk assumptions that underpin the deterministic dates and the QSRA, we agree with the principle that the ASTI ODI Target Date should not put the TOs at immediate risk of being in licence breach. However, we do not consider that our proposed ASTI ODI Target Date of 31 December 2033 necessarily puts the TOs at immediate risk, especially given the Delay Event protections available within the ASTI framework to protect them against delays outside of their control. As explained in our consultation, our view is that the new ASTI ODI Target Dates for EGL3, EGL4 and GWNC should reflect the same challenge to deliver the projects as when ASTI was introduced, and TOs should face the same risk exposure of incurring ODI rewards/penalties, or being in licence breach, as they were originally. We consider this very much in line with ASTI principles, which allow for large potential rewards for accelerating project delivery and delivering the government's Net Zero ambitions, while ensuring strong consumer protection measures are in place to guard against late delivery. We are not clear what potential innovation would be inhibited by setting the ASTI ODI Target Date in December 2033 rather than December 2034 and no further information has been provided on this by the TOs. Concerning the response that setting challenging dates may discourage potentially beneficial MSCs in the future: ASTI was introduced to facilitate delivery of projects required to deliver the government's ambition to connect up to 50GW of offshore wind by 2030 – as we enter 2026 any scope changes to other ASTI projects at this stage are likely to result in long delays to delivery which could potentially undermine delivery against the government's targets and expose consumers to significant constraint costs, and we would have to give extremely careful consideration before determining that MSCs to other ASTI projects are likely to be in consumers' interests.

TO response:

- 3.17. TOs opposed our view shared in the MSC consultation that we considered the three projects had a less than 50% chance of meeting their original ASTI ODI

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Target Dates. They argue that Ofgem had not conducted analysis and therefore could not justify this position.

Ofgem view:

- 3.18. This view was based on the analysis shared by NGET in 2022 which showed that for each of the three projects in question, the P50 date was later than the ASTI ODI Target Date, implying they had less than 50% chance of meeting their original ASTI ODI Target Dates.

Industry response:

- 3.19. Industry (non-TO) responses broadly agreed with our view that a 2033 ASTI ODI Target Date would better protect consumer interests and maintain the credibility of the ASTI framework. One respondent cautioned against further slippage in delivery timelines, noting that 31 December 2033 is already later than their planned connection date, which they say should have been formally communicated sooner. Another respondent noted that they remain concerned about the delay from the original 2031 targets, raising uncertainty for the wider industry in relation to Clean Power 2030 ambitions, and that TOs should still aim for delivery earlier than the proposed dates. Two generator/developers argued that a 2034 ODI Target Date would undermine consumer interests by weakening the ASTI framework, put Net Zero targets at risk, and unfairly favour TOs with easier conditions than originally intended. The individual respondent outlined the strengths and limitations of the QSRA framework and proposed an alternative methodology that neither aligned with TOs nor Ofgem's proposal.

Ofgem view:

- 3.20. We agree with the response from industry and consider that setting a suitably ambitious date for these projects best aligns with the intent of ASTI. We also broadly agree with the response that a 2033 date delivers the best outcome for consumers and generators by ensuring that TOs are not rewarded for dates slipping further back and that generation is connected as quickly as possible. As mentioned above, data provided by NGET in 2022 showed that the TOs accepted

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a high level of challenge on these projects – with ASTI ODI Target Dates being earlier than P50 estimates – we consider that it is appropriate to maintain an equally high degree of challenge now on these projects following the MSC. We understand the frustration of developers looking to connect to the network and the impact that project delays have on their own projects. We are setting dates that we consider maintains a reasonable level of challenge to the TOs and expect them to aim for delivery of the projects as early as possible – ideally significantly earlier than the new ASTI ODI Target Dates. We expect TOs to keep generators informed of any planned changes to project scopes that could affect connection dates as early as possible once these changes are identified.

Q5 When setting a new date as part of a material scope change should we prioritise ensuring that the new date represents a “fair bet” for the TOs delivering the project, or the date maintains an overall fair balance of risk across their portfolio of projects?

High level summary of responses:

3.21. Six responses were received for Q5: three from the TOs supporting a “fair bet” approach to setting ASTI ODI Target Dates based upon current P50 estimates; two from the offshore industry (generator/developers) in favour of our proposed approach to maintaining a fair balance of risk across TOs’ portfolios; and one from the offshore industry (generator) supporting an individual project approach to prevent ASTI project delays.

TO response:

3.22. TOs strongly opposed the use of a portfolio approach to reset ASTI ODI Target Dates under the ASTI framework MSC process, stating Ofgem’s decision to adopt a portfolio approach was not clearly communicated or reflected in the ASTI decision, Guidance or Licence Conditions. This lack of transparency, they argue, undermines the feasibility and fairness of applying such an approach. They asserted that to implement a portfolio approach fairly, Ofgem would need to undertake a financial analysis demonstrating that its post-MSC ASTI ODI

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Target Dates ensure each TO has an even chance of facing rewards and penalties across its portfolio of projects.

Ofgem view:

- 3.23. We consider that balancing the original ASTI incentive on a portfolio basis, rather than setting P50 dates for each project, was clearly communicated when ASTI was introduced. This is very clearly reflected in the fact that the original ASTI ODI Target Date was set significantly after the project EISD for some projects in ASTI, whilst being set on or before the EISD for other projects in ASTI. It would not be logical therefore to suggest that each of these original project ODI dates were equally likely to be delivered against. As such, we consider it appropriate to consider the overall balance of risk across the TO portfolios when ASTI was introduced compared to once the scope change has applied. Our ASTI guidance did not set out a detailed methodology for setting dates in the circumstances of a MSC and how we would consider the overall portfolio. Equally, we said nothing in our 2022 ASTI decision that would set the expectation that the revision of ASTI ODI Target Dates following a MSC would be made on the basis of P50 dates following QSRA, as proposed by the TOs. The MSC consultation clearly explained our proposed methodology and rationale, which has received broad support from non-TO respondents.

TO response:

- 3.24. TOs argued the original 2031 delivery dates were now unrealistic and urged Ofgem to account for the additional scope of work impacts when resetting ASTI ODI Target Dates and reviewing PCF and ECF conditions, advocating for a 'fair bet' approach i.e. for the new ASTI ODI Target Date to be based on a P50 delivery estimate. They agreed that the other elements of the ASTI incentive framework (e.g. incentive rates, and licence requirements) should remain unchanged, provided ASTI ODI Target Dates are set appropriately.

Ofgem view:

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3.25. We accept that the original scope of work included in the HND is not deliverable by 2031 and acknowledge that the actual work TOs need to deliver is a relevant consideration when setting an appropriate ASTI ODI Target Date. We note the TO responses around incentive rates and LOs and, consistent with our consultation position, do not consider it necessary or appropriate to revise these as part of this decision. We also acknowledge the TOs' view that ASTI ODI Target Dates for EGL3, EGL4 and GWNC should be set on the basis of the P50 date determined by each project's own QSRA, however we maintain our view that setting delivery dates on this basis would result in the ASTI incentive no longer being balanced at a portfolio level (see Chapter 3 of the consultation document for a more detailed explanation of our position regarding portfolio balancing). Instead, it would be weighted more in favour of TOs and against consumers than when ASTI was introduced, which we do not consider reasonable or to be in consumers' interests.

TO response:

3.26. TOs suggested the portfolio approach proposed by Ofgem does not align with the approach set out in the ASTI Guidance,¹⁶ which they say indicates the resetting of ASTI ODI Target Dates would be based on project-specific factors.

Ofgem view:

3.27. Stating that our decision will be based on project-specific factors does not preclude us from considering the project's impact within the wider portfolio. Indeed, a portfolio approach inherently requires attention to project-specific factors to maintain overall balance. Furthermore, whether a project's original ODI date was particularly challenging or not is a project-specific factor that has informed our decision. The ASTI Guidance also states that we would consider other factors including *the level of confidence we have in the revised date and*

¹⁶ ASTI Guidance: [Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document.pdf](#)

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the extent to which consumer benefit can be demonstrated from delivering the project later than the original ASTI ODI Target Date.¹⁷

TO response:

3.28. TOs highlighted that Ofgem had not developed any regulatory tools to assess how new delivery dates should be reset as part of MSCs, despite stating that these tools were important and under development. In the absence of these mechanisms, TOs assumed ASTI ODI Target Dates would continue to be determined on a project-specific basis as they assert is outlined in the ASTI Guidance.

Ofgem view:

3.29. The ASTI Guidance¹⁸ noted that we would work with NESO to develop a mechanism for assessing TO proposals for MSCs, specifically to determine whether an MSC delivers consumer benefit. This did not imply creating a tool to set new ODI dates following MSCs. Since the publication of our ASTI guidance, NESO has developed an impact assessment tool, which was applied in this MSC to evaluate consumer benefit. As noted above, our commitment to consider project-specific factors when setting new ODI Target Dates does not preclude us from assessing the project within the broader portfolio context.

TO response:

3.30. TOs noted that as projects mature, new challenges typically extend delivery timelines. They argue structural features of the ASTI framework, such as Delay Events, create systemic downside risk and undermine fairness, leaving portfolios skewed against TOs, as Delay Events only offset penalties without resetting incentives.

Ofgem view:

¹⁷ ASTI Guidance Paragraph 5.31

¹⁸ ASTI Guidance Paragraph 5.32

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3.31. These factors were fully considered when developing the ASTI ODI framework, with input from TOs. Measures such as annual penalty caps and extending all ODI target dates by 12 months from our original 2022 consultation position were introduced to mitigate these risks and ensure that at a portfolio level it was a ‘fair bet’ for TOs with an assumed equal chance of earning rewards or incurring penalties. We are not re-visiting ASTI framework decisions that have already been consulted on and implemented in the TOs’ licences as part of this MSC decision.

TO response:

3.32. TOs noted that differing portfolio sizes limit their ability to manage risk and that TOs with smaller ASTI portfolios have less opportunity to earn rewards through the ASTI ODI. They add that as two of these projects are joint-ventures, this means Ofgem cannot consider the impacts of TO-specific portfolios by setting the same date for each TO.

Ofgem view:

3.33. We consider that our approach to maintaining portfolio balance, consistent with the original ASTI framework, remains the fairest way to ensure each TO bears the same level of risk as when ASTI was introduced. We acknowledge that a smaller portfolio provides less opportunity to earn ASTI rewards, however the scale of the challenge to deliver a smaller portfolio is also markedly less than simultaneously delivering a much larger volume of work. EGL3 and EGL4 were JVs with the same delivery dates across TOs when ASTI was established. Our approach is to maintain the same level of challenge for these projects now as before, not to seek to re-balance TOs’ portfolios so as to create an equal balance relative to each other.

3.34. TOs argue that a financeability impact assessment that considers the potential incentive impact of a Dec 31 2033 delivery date has not been conducted ahead of RIIO-ET3.

Ofgem view:

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- 3.35. Ofgem has undertaken full financeability assessments as part of the RIIO-ET3 Final Determinations, including modelling maximum plausible downside incentive performances to ensure TO financeability.

TO response:

- 3.36. TOs argued that ASTI was set on pre-ASTI EISDs which were more uncertain and didn't consider new delivery framework that allows for acceleration i.e. there was more room to outperform these versus the new deterministic dates.

Ofgem view:

- 3.37. We accept that there is likely to be less room for acceleration against the new deterministic dates compared to the original ASTI EISDs as these original EISDs did not account for new methods of project delivery; we expect the new deterministic dates to be more robust as the projects are further developed at this point. However, given the greater certainty in the project delivery estimates we would expect risk of delay is lower now versus when ASTI was being set.

Industry response:

- 3.38. Industry generator/developer responses in favour of a portfolio approach argued new ODI dates must remain challenging to drive innovation and efficiency in line with the ASTI framework and Net Zero targets.

Ofgem view:

- 3.39. We support these views shared by industry participants.

TO response:

- 3.40. While the TOs were clear that they do not consider it appropriate that ASTI ODI Target Dates are set in a way that maintains overall portfolio balance, as part of their consultation response they also jointly submitted a report from an economics consultancy that implies our consultation position - setting the ODI Target Date equal to the proposed deterministic date - does not represent the same challenge to the TOs as delivering the original scope of work when ASTI was set. This demonstrates, they say, that our proposed ODI Target Dates of 31

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December 2033 do not achieve a balanced incentive at a portfolio level and increases risk to the TOs. This analysis compared P50 data from the MSC QSRA against P50 data provided by NGET in 2022 during the development of the ASTI framework. Using the same daily reward/penalty rate and calculating the number of days between the EISD/deterministic and P50 dates, it calculated that for EGL3 and EGL4 our minded-to position would make delivery approximately eight-to-nine months more challenging than before, and for GWNC approximately two months less challenging.

Ofgem view:

3.41. Using the before and after QSRA data, we have calculated the dates where TOs would face the same level of financial exposure on EGL3, EGL4 and GWNC as when ASTI was introduced, outlined in Table 4 below:

Project	2022 ASTI ODI Target Date vs 2022 QSRA P50	2025 consultation position vs 2025 QSRA P50	Difference between our consultation position and original 2022 position.	Balanced date¹⁹
EGL3	110 days earlier	365 days earlier	255 days more challenging	3 September 2034
EGL4	113 days earlier	365 days earlier	252 days more challenging	10 August 2034
GWNC	366 days earlier	304 days earlier	62 days less challenging	8 October 2033

Table 4: Comparison of ASTI ODI Target Dates relative to P50 estimates, before and after the MSC

¹⁹ This date is calculated by Ofgem from the data provided in the report. We consider this date achieves portfolio balance, as this is the point at which the ASTI ODI Target date would be equally offset from the current P50 estimate as it was when the ASTI ODI Target Dates were originally set.

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3.42. We welcome the report submitted by the TOs which provides a quantified economic analysis and appears to reinforce our consultation position that setting ODI Target Delivery Dates at 31 December 2034, as proposed by the TOs, would tip the overall balance of the incentive in favour of TOs compared to when ASTI was originally introduced – which would be to the detriment of consumers. We recognise there are some issues with the analysis, notably that the QSRA included in the TOs’ 2022 delivery plans was undertaken at quite a high level given that the projects were in an earlier stage of development and is therefore likely to be less robust than the current QSRA data. The consultancy report concluded that due to the better quality of the current QSRA data this should be the basis upon which the ODI Target Dates are set, however our view remains that to do this would not maintain our objective of ensuring the incentive remains balanced at a portfolio level. Whilst we acknowledge the 2022 QSRA may not be as robust as the current QSRA, it was the only statistical analysis available at the time, and to date, that provided insight into the balance of risk/reward within the ASTI portfolio that was accepted at the time. On balance, we do not consider it unreasonable to use this analysis as a benchmark when determining an appropriate ODI Target Date.

Our decision

3.43. Following consideration of all consultation responses and further engagement with industry, we have decided to approve the revised network design around Lincolnshire proposed by the TOs, including major scope changes to EGL3, EGL4 and GWNC (and LRN#)²⁰. The revised ASTI Outputs to reflect the updated scope of work is set out in Table 5 below. We have also decided to set the ODI Target Delivery Date for EGL3, EGL4 and GWNC as follows:

²⁰ Although not included in this decision as it is not part of the ASTI framework, the LRN# project is design interlinked with and in geographical proximity to EGL3, EGL4 and GWNC, and Ofgem supports the further development of the LRN# option (please see chapter 2 of the consultation document for more details).

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Project	Description	ASTI ODI Target Date	Delivery Body
EGL3	Eastern Scotland to England 3rd link: Peterhead to West Norfolk offshore HVDC (EGL3) (NOA Code: E4L5)	31 August 2034	NGET / SSE
EGL4	Eastern subsea HVDC link from East Scotland to West Norfolk (EGL4) (NOA Code: TGDC)	31 August 2034	NGET / SPT
GWNC	New 400kV double circuit between South Humber and West Norfolk (NOA Code: GWNC)	31 December 2033	NGET

Table 5: Updated project descriptions and ASTI ODI Target Dates

Rationale for our decision

- 3.44. Our approach to setting delivery dates and funding arrangements for EGL3, EGL4, and GWNC has been guided by the principle of maintaining portfolio balance of risk across each of the TOs and ensuring that an MSC should not unfairly tip this balance of risk versus reward across the ASTI regime in favour of the TOs at the disbenefit to consumers. Following consideration of all consultation responses we remain of the view that this is an appropriate approach to ensure consumers are adequately protected and note that it was only TO respondents that considered it more appropriate to base updated ODI Target Delivery Dates on current QSRA P50 dates.
- 3.45. We consider that maintaining our consultation position of setting the ODI Target Delivery Date to December 2033 for GWNC, and moving the date to August 2034 for EGL3 and EGL4, achieves our objective of ensuring at a portfolio level the ASTI incentive remains balanced. In our consultation, we stated that ‘we will consider any evidence and justification that supports the selection of an

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alternative ODI Target Delivery Date between 31 December 2033 and 31

December 2034' and that 'such evidence would need to sufficiently justify how the relevant date achieves a fair overall risk balance in terms of the individual projects and the wider ASTI framework'.²¹ The revised ODI Target Delivery Dates for EGL3 and EGL4 have been set based on our analysis of the economic data provided to us by the TOs in response to the consultation. The consultancy report that they jointly provided indicated that the minded-to dates we proposed for EGL3 and EGL4 would have placed these projects in a more challenging position than when ASTI was originally set. For GWNC, the revised delivery date represents a marginally less challenging position compared to the original commitment.

- 3.46. We recognise there are some limitations with this analysis and the QSRA as discussed above, however this is the most robust information and the best methodological basis available to set new ASTI ODI Target Dates in a way that meets the objective of ensuring the challenge to TOs remains most comparable to when ASTI was introduced. We have had further engagement with the TOs concerning the current QSRA to interrogate the analysis and assumptions that lie behind it, and based on this we are content to take the analysis and the data provided to us by the TOs at face value. As such, we are satisfied that the dates in Table 5 above broadly reflect the same challenge for TOs to deliver by as when ASTI was set, and consequently consider the overall ASTI incentive remains balanced at a portfolio level.
- 3.47. We acknowledge the commissioning sequencing issues highlighted by the TOs and accept that this would likely pose a challenge to delivering EGL3 and EGL4 simultaneously by their deterministic delivery dates. We remain unclear however, on the extent to which the commissioning requirements will delay the projects, as well as which project is expected to be commissioned first. We also note a high degree of uncertainty around the additional time required to commission the EGL projects sequentially, with TO estimates from around 40

²¹ Paragraph 3.20

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days if there are no major commissioning issues to potentially up to 6 months.

Setting a considerably later delivery date than consulted on for both of these projects allows TOs opportunity to consider an appropriate approach to sequencing their delivery in a manner which factors in the respective system needs and level of project development.

- 3.48. We have also considered the risk of licence breach in setting these dates. We do not intend to automatically take enforcement action where an ASTI licence breaches occurs due to late delivery, and before initiating any enforcement action we would consider a range of factors as set out in the ASTI Guidance.²² The LO is to deliver projects no later than 12 months after the ODI Target Dates; this decision means that the new LO is later than the P50 estimates for each of the projects, and as such we consider the risk of licence breach is certainly no greater than when ASTI was introduced.
- 3.49. We maintain our position that the individual project ‘fair bet’ approach advocated by the TOs, where delivery dates are set at the P50, does not provide the appropriate balance of risk and reward across the portfolio – skewing it further into TO reward than when ASTI was originally established. Instead, our approach seeks to ensure that incentives remain challenging but fair, that consumer interests are protected, and that TOs are incentivised to deliver these projects as close as possible to when they were originally required in support of the government’s decarbonisation ambitions.
- 3.50. We consider ensuring the incentive mechanism is not skewed in favour of TO reward is particularly pertinent given the fact that each of these projects is now being delivered significantly later than their original optimal dates of 2030, with consumers already exposed to considerable constraint costs as a result of the delay in reinforcing the onshore transmission network. It is important to emphasise that our overarching objective is to see these projects delivered as

²² Further details included in the ASTI Guidance paragraph 4.89

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soon as possible to maximise benefits for consumers and support the government's decarbonisation ambitions.

- 3.51. Going forward, we wish to see the time between identifying the need for scope changes and approving preferred solutions reduced and will continue to work jointly with TOs and NESO to streamline this process where possible.
- 3.52. While we consider it appropriate to maintain overall incentive balance across the ASTI portfolio, in the future, when setting new ODI target dates for projects outside of the ASTI regime we expect QSRA and robust P50 estimates to be a key feature in how we set incentive target delivery dates and as such we need to ensure that the analysis is robust and based on a transparent and shared set of assumptions around project delivery timelines and risk. We will continue working with the TOs and NESO to further develop the approach to QSRA to ensure that in future it will provide Ofgem with sufficient confidence to use the QSRA outputs when setting target delivery dates.

4 Eastern Green Link 3 (EGL3) Early Construction Funding Assessment

Section summary

This chapter summarises our September 2025 consultation position on EGL3 Early Construction Funding as well as the consultation responses and our decision following consideration of those responses.

Consultation question

Q7. Do you agree with our minded-to position to provide ECF for the EGL3 project as set out in Chapter 4?

EGL3 ECF application

- 4.1 In September 2024, the EGL3 JV made a formal application for ECF under Part C of SpC 3.41 of the TOs' licences to enable it to undertake early construction activities. It made an updated submission in July 2025.
- 4.2 The MSC request, outlined in Chapter 2, progressed alongside the ECF submission for EGL3 and indicated a change in the forecast project costs. Following our decision in Chapter 3 to approve the revised network design around Lincolnshire proposed by the TOs, we note the updated forecast costs submitted and intend to amend the ASTI Confidential Annex to reflect these revised costs. The ECF application is therefore being considered based on the project's updated forecast costs as set out in Table 6 below. These costs are commercially sensitive and not included in this document.
- 4.3 For the avoidance of doubt, final project allowances will be determined at PA stage following a full efficiency assessment.

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Project	Percentage of total project spend
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Eastern Green Link 3 (EGL3)	8%
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Table 6: ECF Application

Funding application (percentages rounded up / down to the nearest whole percent)

ECF category	Summary of works
Early procurement commitments	<ul style="list-style-type: none"> • Converter technology • Cable financial commitment • Cable civil south • Cancellation Exposure*
Strategic land purchases	<ul style="list-style-type: none"> • North – Netherton Hub Land Costs • North – Netherton Cable Servitude Rights • South – Converter Site • South – Landfall Site – Anderby Creek

Table 7: Summary of works submitted for each of the ECF categories

**No specific cancellation costs have been included within the total project spend in*

Table 6

Consultation position

4.4 The EGL3 JV's application sought ECF of 8% of the updated total project cost, to cover activities from FY 2024/25 to 2027/28.

4.5 The requested allowance did not exceed 20% of the total forecast project cost, as stipulated in SpC 3.41.8.

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- 4.6 The ECF activities include early procurement, design, surveys, and strategic land acquisition, to support timely delivery of the EGL3 project. We consider that the activities identified by the EGL3 JV fell within the ECF permitted activity areas.²³
- 4.7 The EGL3 JV identified a range of potential cancellation costs based on supplier inputs in line with the requirements of paragraphs 4.20 to 4.23 in the ASTI guidance. In our consultation we proposed to allow recovery of efficiently incurred and well-justified cancellation costs through a PA if the project is cancelled for reasons outside the JV's control up to the point of DCO decision (expected by December 2027). Recovery will be subject to evidence of effective risk management, efficiency, and strong consumer protection mitigations.

Summary of consultation responses

- 4.8 For Q7, we received comments on the EGL3 ECF from two industry stakeholders and one from the EGL3 JV.
- 4.9 The two industry stakeholders were favourable towards providing ECF for EGL3, with one acknowledging that the ECF request will help accelerate delivery while maintaining strong accountability for cost-effective project management and successful completion.
- 4.10 The EGL3 JV agreed with the position to approve the ECF request, acknowledging the importance of early commitments to secure HVDC supply chain capacity and critical civils and land packages. It agrees that the proposed activities fall within ASTI's permitted categories and supports Ofgem's proposal to approve ECF funding at 8% of the updated forecast project cost.
- 4.11 The EGL3 JV's response is also in favour of Ofgem's position on the cancellation cost element. The response also provided detail on the EGL3 JV's intention to continue towards concluding contract negotiations for HVDC cables and converters, and work to make consumers' exposure from a project cancellation

²³ [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

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scenario as low as practicable whilst aiming to provide efficient delivery of the project.

Our decision

- 4.12 We are satisfied that the ECF the EGL3 JV has requested will help accelerate the delivery of the wider EGL3 project and that it is in consumers interests for costs to be incurred early.
- 4.13 Therefore, after consideration of stakeholder responses, we have decided to maintain our minded to consultation position, including in relation to treatment of cancellation costs, and approve the EGL3 JV's full ECF request of 8% of the updated total forecast project cost listed in the ASTI Confidential Annex as permitted under SpC 3.41 following this decision.
- 4.14 Based on our recent engagement with the EGL3 JV, we expect an ASTI PA submission request by mid-2027. We will undertake a full cost assessment, including ECF costs, at the ASTI PA stage and will review whether ECF expenditure was efficient.

5 Eastern Green Link 4 (EGL4) Early Construction Funding Assessment

Section summary

This chapter summarises our September 2025 consultation position on EGL4 ECF as well as the consultation responses and our decision following consideration of those responses.

Consultation question

Q8. Do you agree with our minded-to position to provide ECF for the EGL4 project as set out in Chapter 5?

EGL4 ECF Application

- 5.1. In September 2024 EGL4 JV made an application for ECF under Part C of Special Condition (SpC) 3.41 of the TO's licence to enable funding of early construction activities for EGL4. It made an updated submission in July 2025.
- 5.2. The MSC request outlined in Chapter 2, progressed alongside the ECF submission for EGL4 also indicates a change in forecast project costs. Following our decision in Chapter 3 to approve the revised network design around Lincolnshire proposed by the TOs, we note the updated forecast costs submitted and intend to amend the ASTI Confidential Annex to reflect these revised costs. The ECF application is being considered based on the project's updated forecast cost as set out in table 8 below. These costs are commercially sensitive and not included in this document.
- 5.3. For the avoidance of doubt, final project allowances will be determined at the PA stage following a full efficiency assessment.

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Project	Percentage of total project spend
Eastern Green Link 4 (EGL4)	13%

Table 8: ECF application

Funding application (percentages rounded up / down to the nearest whole percent)

ECF category	Summary of works
Early procurement commitments	<ul style="list-style-type: none"> • Converter OEM • Cable OEM • Converter Platform Civils • Cable Civils South • Insurance • Project Management/Legal • Cancellation Exposure*
Strategic land purchases	<ul style="list-style-type: none"> • North – Three Converter Sites and an AC Cable Route • North – Landfall Site – Kinghorn • South – Converter Site • South – Landfall Site – Anderby Creek
Early enabling works	<ul style="list-style-type: none"> • North – undergrounding of OHL in Converter Field (across the proposed northern converter site (Westfield))
Other activities	<ul style="list-style-type: none"> • Unexploded Ordnance (UXO) activities

Table 9: Summary of works submitted for each of the ECF categories

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**No specific cancellation costs have been included within the total project spend in*

Table 8

Consultation position

- 5.4. The EGL4 JV's application sought ECF of 13% of the updated total project cost, to cover activities from FY 2025/26 to 2027/28
- 5.5. The requested allowance did not exceed 20% of the total forecast project cost as stipulated in SpC 3.41.8.
- 5.6. The ECF activities included early procurement, strategic land access, enabling works, and a standalone Unexploded Ordnance (UXO) survey contract. We consider that the activities identified by the EGL4 JV fell within the ECF permitted activity areas.²⁴
- 5.7. The EGL4 JV identified a range of potential cancellation costs based on supplier inputs in line with the requirement of paragraphs 4.20 and 4.23 in the ASTI guidance. In our consultation we proposed to allow recovery of efficiently incurred and well-justified cancellation costs through a PA if the project is cancelled for reasons outside the JV's control up to the point of DCO decision (expected by December 2027). Recovery will be subject to evidence of effective risk management, efficiency, and strong consumer protection mitigations.

Summary of consultation responses

- 5.8. For Q8, we received comments on the EGL4 ECF from two industry stakeholders and one from the EGL4 JV.
- 5.9. The two industry stakeholder responses support providing ECF for EGL4 with one respondent emphasising the importance of timely delivery within budget constraints. It acknowledges the coordinated approach between EGL3 and EGL4 for shared southern infrastructure, including common facilities, as a demonstration of efficient project management and appropriate risk allocation.

²⁴ [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

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The response highlights that ECF should help accelerate delivery in line with Clean Power 2030 objectives.

- 5.10. The EGL4 JV welcomes Ofgem's assessment and engagement on its ECF request, recognising the need for early commitments to secure HVDC supply chain capacity, civils packages, and land purchases. It agrees that the proposed activities fall within ASTI's permitted categories and supports Ofgem's proposal to approve ECF funding at 13% of the updated forecast project cost.
- 5.11. The EGL 4 JV also supports Ofgem's recognition of cancellation risks and its proposal to allow recovery of efficiently incurred cancellation costs, subject to assessment. It highlights its use of National Grid's HVDC framework contracts and its efforts to limit consumer exposure through contract structures and land acquisition strategies. In the event of cancellation, the JV would seek to repurpose or dispose of land assets to further protect consumers.

Our decision

- 5.12. We are satisfied that the ECF the EGL4 JV have requested will help accelerate the delivery of the wider EGL4 project and that it is in consumers interests for the costs to be incurred early.
- 5.13. Therefore, after consideration of stakeholder responses, we have decided to maintain our minded to consultation position, including in relation to treatment of cancellation costs, and approve the EGL4 JV's full ECF request of 13% of the updated total forecast project cost listed in the ASTI Confidential Annex as permitted under SpC 3.41 following this decision.
- 5.14. Based on our recent engagement with the EGL4 JV, we expect an ASTI PA submission request by mid-2027. We will undertake a full cost assessment, including ECF costs, at the ASTI PA stage and will review whether ECF expenditure was efficient.

6 Pre-construction Funding

Section summary

This chapter summarises our September 2025 consultation position on Pre-construction funding for EGL3, EGL4 and GWNC as well as the consultation responses and our decision following consideration of those responses.

Pre-construction funding request

- 6.1. The TOs requested a reallocation of the PCF allowance for EGL3. Originally approved under the LOTI framework, the TOs proposed moving this allowance into the ASTI framework.
- 6.2. Due to the MSC to EGL3, the EGL3 JV stated that they have had to undertake significantly more Pre-Construction Works than originally expected and that it will now cost more, and take longer than originally assumed, to secure all material planning consents and deliver the PCF PCD.
- 6.3. The EGL3 JV made a request to remove the existing EGL3 PCF PCD from Appendix 2 of SpC 3.15 and to insert a new EGL3 PCF PCD into Appendix 2 of SpC 3.40 (and revising Appendix 1 accordingly).
- 6.4. The EGL3 JV have also requested an increase to their already-provided PCF allowances for EGL3. The EGL3 JV have undertaken an assessment of expected pre-construction costs for EGL3 and have requested revised PCF allowances that equate to a higher figure than the default 2.5% of forecast project costs, with the amount requested instead around 3.5% of EGL3's updated forecast costs (exact figures are confidential and not stated within this document).

Consultation position

- 6.5. In our minded-to position, we supported the EGL3 JV's proposal to transfer the EGL3 PCF allowance from the LOTI framework to ASTI. We agreed with the rationale that the scope and delivery of EGL3 have materially changed, and the project now falls within ASTI's remit. We considered this reallocation appropriate to maintain regulatory coherence and to ensure that the funding mechanisms reflect the current project structure.

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6.6. We noted that the EGL3 JV's PCF request for EGL3 is in excess of the default 2.5% of project value provided under ASTI. The ASTI Guidance²⁵ states that when providing PCF for a new ASTI Output we will 'either (i) set allowances based on our view of the specific work required for the new project or projects; or (ii) set allowances at the same average proportion of total estimated project costs across the portfolio'. We had not undertaken a detailed assessment of EGL3 pre-construction costs and therefore considered it more efficient to set initial allowances at 2.5% of the forecast project cost initially and assess additional PCF requests in future at the ASTI portfolio level. Theoretically, EGL3 JV should then only need to trigger the re-opener once, rather than on multiple occasions.

6.7. In our consultation, we proposed the following:

- EGL3 (LOTI) PCF PCD is removed from Appendix 2 of Special Condition 3.13²⁶ and the allowance in Appendix 1 is revised accordingly;
- EGL3 is added as an ASTI PCF PCD to Appendix 2 of Special Condition 3.40 and the allowance in Appendix 1 is revised accordingly;
- Allowance for the ASTI PCF PCD set at 2.5% of the new total forecast cost of EGL3, net of PCF allowances already provided under Special Condition 3.13; and
- TOs can trigger the ASTI PCF re-opener and adjust allowances for all ASTI projects (including EGL3) at a portfolio level in accordance with Special Condition 3.40.

Summary of consultation responses

6.8. Seven responses were received for Q3 and Q6: one from each of the TOs, two from the offshore industry participants, and two from individuals.

²⁵ [Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document](#) Paragraph 3.19

²⁶ In the consultation, we incorrectly referred to SpC 3.13 as the condition to be amended. This should have been SpC 3.15. Our decision and the proposed licence changes reflect the correct condition SpC 3.15

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- 6.9. The industry participants and individuals were broadly supportive of moving EGL3 PCF allowances from the LOTI PCF condition SpC 3.15 to ASTI PCF condition SpC 3.40. One industry participant in particular acknowledged the benefits of moving the EGL3 PCF allowance from LOTI to ASTI but expressed concern over the reduced planning and consent requirements under ASTI. They requested robust assurances from Ofgem that the change would not compromise project certainty or the integrity of the regulatory framework.
- 6.10. For EGL3, the EGL3 JV agreed with our approach of setting PCF at 2.5% for EGL3 with any additional PCF request to be made under the ASTI PCF re-opener at the ASTI portfolio level. The EGL3 JV further recommended removing the existing LOTI PCF PCD from Appendix 2 of SpC 3.15 in both NGET and SHET's licences and updating Appendix 1. The EGL3 JV also proposed inserting a new ASTI PCF PCD into Appendix 2 of SpC 3.40, with an updated output and delivery date of 31 March 2028 updating Appendix 1 of the condition accordingly.
- 6.11. For EGL4, the EGL4 JV requested for clarification that a consistent approach to resetting PCF on the updated total project costs following MSC would be applied for both EGL3 and EGL4. The EGL4 JV also proposed revising the PCF PCD delivery date for EGL4 from 31 March 2026 to 31 March 2028 in both NGET's and SPT's licences.
- 6.12. For GWNC, NGET's proposal included removing the existing LOTI PCF PCD from Appendix 2 of SpC 3.15 and updating Appendix 1. A new ASTI PCF PCD would be inserted into Appendix 2 of SpC 3.40, with a PCF PCD delivery date of 27 February 2029 and Appendix 1 would be updated accordingly. Following the publication of our consultation, NGET have asked for the LOTI PCF value for GWNC to be moved across to the ASTI Special Condition and not to base GWNC PCF allowance on the 2.5% of forecast costs approach, as it has already previously been cost assessed. NGET also noted that it had requested the SHNS allowance under RIIO-T2 to be built into the final ASTI PCF position for this project.

Our consideration of the consultation responses

- 6.13. We note the TOs' request to provide clarification on the approach for PCF allowances across all three projects. In our consultation, we stated 'TOs can trigger the ASTI PCF re-opener and adjust allowances for all ASTI projects (including EGL3) at a portfolio level in accordance with Special Condition 3.40'²⁷. As EGL3, EGL4 and GWNC are all ASTI projects, PCF will be provided through the ASTI PCF mechanism in Special Condition 3.40.
- 6.14. In Chapter 4 and 5, we noted the updated forecast costs submitted following the MSC and clarified our intent to amend the ASTI Confidential Annex to reflect these forecast costs for EGL3 and EGL4 respectively. We also agree with the impact of the MSC on the three ASTI projects' PCF activities in relation to the original forecast costs. Therefore, the PCF requests are being considered based on these three ASTI projects' updated forecast costs respectively. These costs are commercially sensitive and not included in this document.
- 6.15. For the avoidance of doubt, final project allowances will be determined at the PA stage following a full efficiency assessment.
- 6.16. With regards to the EGL3 JV's request for EGL3 which is in excess of the default 2.5% of project value provided under ASTI, we still consider it a more efficient use of resources to set initial allowances at 2.5% of the forecast project cost initially. We will assess additional PCF requests in future at the ASTI portfolio level. Theoretically, the TOs should then only need to trigger the re-opener once, rather than on multiple occasions.
- 6.17. We agree with the EGL4 JV's position to recalibrate the ASTI PCF allowance for the EGL4 project to 2.5% of the updated forecast project cost.
- 6.18. We agree with NGET's proposal that PCF for GWNC should be provided through the ASTI PCF mechanism rather than the LOTI PCF mechanism. We note that NGET's request for PCF for GWNC includes additional funding to enable the

²⁷ [Material Scope Change And Early Construction Funding GWNC EGL3 and EGL4.pdf](#), paragraph 3.29, bullet point 4

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incorporation of incremental wider works identified in earlier Network Options Assessments into the project scope, namely the SHNS and WWNC projects for substation reinforcement and network links, respectively. As there is no increase in PCF for the core need proposed by NGET for GWNC, we have decided to set initial allowances to match the PCF value currently included in Appendix 2 of SpC 3.15, with an uplift to cover the additional request for inclusion of the incremental wider works noted above (under SHNS and WWNC).

- 6.19. We acknowledge the request from the TOs to amend the PCF PCD Delivery Dates in appendix 2 of SpC 3.40, following the MSC. In accordance with Appendix 6 of the Price Control Deliverable Reporting Requirements and Methodology Document,²⁸ efficient ASTI PCF allowances, on a project-by-project basis, will be set to allow TOs to deliver outputs as part of RIIO-3, as the Delivery Date falls within the period covered by this price control. Based on the request from the TOs in the respective responses for EGL3, EGL4 and GWNC and subsequent engagement following this consultation, we agree with the proposed PCF PCD Delivery Dates as set out in table 10 below.

Project Name	Output	Delivery Date
Eastern subsea HVDC Link from east Scotland to West Norfolk (EGL4) (NOA Code: TGDC)	Submission of all material planning consent applications for TGDC	31 March 2028
Eastern Scotland to England 3rd link: Peterhead to West Norfolk offshore HVDC (EGL3) (NOA Code: E4L5)	Submission of all material planning consent applications for E4L5	31 March 2028

²⁸ Price Control Deliverable Reporting Requirements and Methodology Document [Appendix 6 to the PCD Reporting Requirements and Methodology Document.pdf](#)

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Project Name	Output	Delivery Date
New 400kV double circuit between South Humber and West Norfolk (NOA Code: GWNC)	Submission of all material planning consent applications for GWNC	27 February 2029

Table 10: ASTI Pre-Construction Funding Price Control Deliverables (£m)

6.20. We have also considered the feedback from industry participants requesting robust assurances that this change would not compromise project certainty or the integrity of the regulatory framework. We maintain the view that, although PCDs under ASTI and LOTI differ slightly, this does not constitute a material issue. We consider that the additional benefits of using ASTI PCF, particularly the flexibility of substitutability and the ability to trigger re-openers to adjust allowances at a portfolio level, outweigh the potential risks associated with a slightly less stringent PCD requirement under ASTI compared to LOTI.

Our decision

- 6.21. Following consideration of feedback to the consultation, we have decided to:
- Remove EGL3 (LOTI) PCF PCD from Appendix 2 of SpC 3.15 and the allowance in Appendix 1 is revised accordingly
 - Add EGL3 as ASTI PCF PCD to Appendix 2 of SpC 3.40 and the allowance in Appendix 1 is revised accordingly
 - Amend ASTI PCF PCD Delivery Dates in appendix 2 of SpC 3.40 to reflect our decision
 - Set the allowance for the EGL3 ASTI PCF PCD at 2.5% of the new total forecast cost, net of PCF allowances already provided under SpC 3.15

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- Allow TOs to trigger the ASTI PCF re-opener and adjust allowances for all ASTI projects (including EGL3) at a portfolio level in accordance with SpC 3.40
- Recalibrate the allowance for the EGL4 ASTI PCF PCD to 2.5% of the new total forecast cost of EGL4 and amend Appendix 1 of SpC 3.40 accordingly
- Remove EGL4 ASTI PCF PCD from Appendix 2 of SpC 3.15 and revise the allowance in Appendix 1 of SpC 3.40 accordingly
- Remove the GWNC LOTI PCF PCD from Appendix 2 of SpC 3.15 and revise the allowance in Appendix 1 accordingly
- Add GWNC as an ASTI PCF PCD to Appendix 2 of SpC 3.40 and revise the allowance in Appendix 1 accordingly
- Set the allowance for the ASTI PCF PCD for GWNC at the value based on that previously allowed under LOTI PCF PCD with an adjustment to enable inclusion of wider works (under NOA codes SHNS and WWNC), net of PCF allowance already provided under SpC 3.15

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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 decision. 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.