

GLA response to Ofgem ED3 Sector Specific Methodology Consultation (SSMC)

This consultation is timely and welcome, given our shared ambition to ensure the infrastructure is in place to support the transformation of our energy system, while concurrently delivering sustainable economic growth and keeping the costs of infrastructure development as low as possible.

In London, our key priorities include the provision of safe and affordable housing, and achieving net zero by 2030 while strengthening climate resilience. We also acknowledge and agree with the key contextual drivers for change in the upcoming price control period, namely the significant increase in electricity demand that is expected in the 2030s, decentralisation of the energy system, the evolving role of strategic planning, and the impacts of climate change. It is imperative that stakeholders' efforts are aligned to facilitate a coherent approach to planning for and meeting these demands. This should include consideration of how the key driving objectives are interconnected, such as the shift in the balance of risk in favour of more proactive investment to ensure capacity is available at the critical time when it is needed.

Below, we raise our strategic points within each of the themes of the proposed changes to SSMC. Much of our response is informed by our experiences with the following –

- **The development of the Local Area Energy Plans (LAEPs):** Subregional plans developed by the GLA, with subsequent more detailed LAEPs taken forward by some London Boroughs, have offered a robust evidence base on the projected electricity demand and long-term investments needed to support decarbonisation. Where available, these should inform the outputs for DNO business plans to offer a local perspective on future investment needs.
- **west London capacity constraints:** The rapid influx of large demand customers that created capacity constraints on both the distribution and transmission networks in three west London boroughs, absorbing the remaining capacity in the area for the remainder of the decade and impacting housing delivery. As such, any reforms to the redefinition of connection categories should take into account the varying risk profiles of different developments, with the aim of producing greater equity in connection experiences of customers.
- **Collaboration incentive:** There are opportunities in ED3 to take into consideration lessons learned from similar area-based approaches in other sectors, such as the RIIO-ED2 Collaboration Incentive. The adoption of this approach has facilitated the successful collaboration of multiple utilities and stakeholders in delivering infrastructure works, minimising disruption and generating cost savings.

Long-term integrated network development plans

Q1. What are your views on our regulatory guiding principles that will inform the development of accountable investment planning and delivery?

- As acknowledged in our response to the Ofgem ED3 Framework Consultation, the UK's energy needs will continue to grow as a result of decarbonisation, as well as the growth in housing delivery, and in innovative and energy intensive sectors such as data centres.
- The strategic alignment as a guiding principle for ED3 focuses on national decarbonisation goals, but not the other core missions for government such as economic growth and housing delivery targets.
- As an example, there could be a requirement for Long-term Integrated Network Development Plans (LINDP) planning horizons to align with national net zero targets as well as national growth targets, which for London includes a new target of 88,000 new homes per year for the next 10 years.

Q4. Do you agree with the proposed use of tRESP outputs in DNOs' network impact assessments?

- The GLA supports in principle the development of LINDPs for DNOs as part of ED3 to facilitate better planning and proactive investment.
- However, we have concerns regarding the use of tRESP outputs for the ED3 period, particularly in the context of the nascent status of the RESP and the shortcomings of the tRESP approach.
- In our tRESP consultation response, the GLA highlighted a number of concerns around the lack of use of locally-available data, quality of engagement processes, and accuracy of assumptions for the London-region. Examples of these concerns include – not requiring the use of available Local Area Energy Plans (LAEPs) evidence, poor response rates to engagement activities from key stakeholders, and incorrect presentation of key London-based policies and initiatives.
- These may create gaps in Ofgem's assessment of London-based DNO business plans, and by extension, risk preventing London's ability to secure strategic investment when and where it is required.
- We recommend that Ofgem adopt a pragmatic view of the quality of tRESP evidence and seek to supplement this with a stronger weighting towards DNO evidence inputs, which are built on more robust data collection and engagement processes than what the tRESP was able to achieve in its short timeframes of development.
- Given the competing timelines, the RESP evidence should be integrated at latter stages of ED3. For example, they can be linked to re-openers, rather than to appraise investment requirements early in the ED3 process. This will enable sufficient time for the RESP to build up capacity and improve its processes.

Q5. What are your views on the guidelines for proactive investment decision-making across all DNOs?

- Where available, strategic area-based planning inputs, such as completed subregional LAEPs, should be used as guidelines for proactive investment to allow for consistency.
- In the GLA's recent experience with attempting to facilitate proactive investment in the Royal Docks, the misalignment with the DNO's build timeframes is delaying the development of a project identified as a local priority.
- For "low-regret" investment opportunities, there should be a consideration of investments where it is planned for and addressed by local growth priorities, such as considering Local Plan site allocations within the Scottish and Southern Electricity Network's Strategic Development Plans¹, where planning applications would not yet have been submitted. We would signpost SSEN's Strategic Development Plans as a useful mechanism for outlining a more spatial approach to network development and investment that is more aligned to broader spatial planning processes.
- As part of the requirement for DNOs to provide a consistent set of indicators to identify low-regret proactive investment opportunities, there is an indicator of "connection delays to projects with societal benefits". Further clarity is needed on what would specifically fit within this category. If the definition is left broad, different sectors with unique drivers may pursue these mechanisms despite having varied societal impacts. For examples, data centres are major energy connections that have the potential to attract investment and growth opportunities. However, the GLA's experience in the case of the electricity capacity constraints that are ongoing in west London demonstrate that as major energy connections, their large energy consumption may have adverse impacts on competing developments such as affordable housing should they take up large capacity in the electricity queue.
- To address this potential risk of inequitable outcomes, the GLA suggests that societal benefits is further expanded. For example, affordable housing, retrofit, decarbonisation, community energy, EV charging, and social infrastructure (including NHS estates) programmes can be included within this definition.
- When considering investments that bring wider societal benefits, it would be helpful to request for specific links to be made to existing plans such as the London Growth Plan, the forthcoming London Infrastructure Framework, as well as national growth targets, the 10-Year-Infrastructure Strategy, and the NISTA infrastructure projects pipeline.
- For certain sectors with unique infrastructure considerations, the GLA suggests requiring a consistent planning assumption alongside growth pathways to assess network impact (such as data centres, electric vehicles, heat pumps, and energy efficiency). In the case of data centres, their rapid growth and disproportionate impact on the distribution network across London poses particular risks to broader electricity planning.

¹ [Strategic Development Plan \(SDP\) - SSEN](#)

Q6. Do you agree that LV network reinforcement and unlooping of legacy service connections are suitable areas for a programmatic, area-based approach in ED3? Why or why not?

- When considering a “structured, programmatic approach” to reinforcement in an area-based manner, it should be considered that beyond smart technologies deployment there are other infrastructure-related works at the local level (e.g., gas disconnection, heat networks).
- This presents an opportunity for ED3 to consider learnings from other sectors. The collaborative streetworks incentive in the GD2 price control period has demonstrated significant results. By focusing the incentive to touch the customer once, rather than touch the network once, there have been important benefits to customers, efficiency gains and value for money improvements.
- Preliminary data available across GD2 Years 1-3 indicates that over 1,012 days of disruption have been saved, equating to £5.03 million in resident wellbeing. This Output Delivery Incentive (ODI) has underpinned the scaling of collaborative delivery in London, with these efforts providing a blueprint of how bespoke, innovative regulation can empower infrastructure providers to embed social, economic, and environmental priorities as part of their capital delivery operations.

Q7. What are your views on the need for national consistency in the delivery of proactive unlooping programmes?

- We would appreciate further clarity on how a proactive approach to unlooping supports efficient planning and delivery, including reducing disruption to customers, if it involves properties that do not request unlooping. Reducing disruption would be best achieved through facilitation of RIIO-ED2 Collaboration Incentive, through which a ‘dig-once’ approach is pursued through the collaboration of multiple utilities.
- Beyond the requirement for “an inclusion of data-driven mapping to identify high density areas and priorities upgrades”, ED3 should also include requirements for areas where additional collaboration could be undertaken due to the presence of other infrastructure providers works to minimise disruption to the customer.
- Ofgem mentions that the proposed proactive approach to unlooping reflects lessons learned from RIIO-ED2. They should also consider lessons learned from similar area-based approaches in the gas sector, as explained in the GLA’s response to Question 6.
- The “dig once” approach adopted across London was central to enabling multiple utilities and stakeholders to collaborate on delivering works, minimise disruption, and share resources. The Collaboration Incentive across GD2, ED2 and AMP8 provided the governance and framework encouraging joint planning and delivery. As a result, utility partners saved more than 2,500 days of disruption, over £1.8 million in delivery costs, while residents benefited from

£12.9 million in increased social value and wellbeing, and 500,000 hours of journey time saved worth £3.9 million. Businesses avoided £3.2 million in losses, and 168 tCO₂ emissions were prevented through reduced trips.

- A more area-based, regional perspective would bring benefits to enabling local authorities to participate and support this approach as illustrated by the GLA's role in the GD2, ED2 and Amp 8 Collaboration Incentive that has been adopted across London. For example, if an area has access to funding and expresses interest in supporting this approach, they could concurrently undertake broader area-based decarbonisation.
- **Case Study: EV charging hub**
 - The recent connection experience of a London EV charge hub demonstrates key considerations for looped connections. While this case concerns looped high-capacity EV infrastructure rather than domestic low-voltage looped service connections that are referenced in the ED3 consultation, it highlights similar challenges – unclear thresholds, cost barriers, and lack of future-proofing.
 - Background:
 - DNO advised that looped connections are typically only required once demand approaches or exceeds 4 MVA, providing enhanced security and resilience.
 - Looped schemes involve a dedicated feeder and incur significant ongoing Operating and Maintenance (O&M) charges.
 - Decision Factors:
 - Below ~3–4 MVA, connections can often be accommodated on an existing feeder.
 - Beyond 4 MVA, a dedicated feeder and a looped arrangement is usually required.
 - Despite looped connections being standard for this developer's other EV charging sites across Europe, they opted for a single 4MVA cable connection at this significantly sized London site due to the increased O&M costs of a looped connection.
 - The developer also explored installing a spare duct for future flexibility without committing to a looped scheme upfront, but this was not permitted by the DNO.
 - Key Insights for ED3:
 - **Threshold clarity:** DNO guidance on when looped connections are required (e.g., above 4 MVA) may help developers plan effectively and avoid multiple applications.
 - **Cost impact:** High ongoing O&M charges for looped schemes often deter developers, even where looped resilience may have benefits.

- **Future-proofing:** Developers may wish to upgrade to looped connections as demand grows; current approaches may undermine a “dig once” approach and increase future disruption.
- **Regional variation:** London-specific constraints can force developers to adopt different approaches compared to other European cities.

Strengthening delivery accountability

Q10. Are additional delivery incentives needed, or can a combination of accountability mechanisms and output-based incentives sufficiently ensure delivery performance?

- The GLA broadly supports the proposed output-based metric proposed by UKPN – the “Timely Additional Network Capacity Indicator”, which would measure the net asset capacity added through delivered intervention in ED3.
- This approach can potentially help create an additional mechanism for DNOs to be adaptable to changing network needs to upgrade the overall health of the network and increase capacity. This could improve the overall quality of services delivered to customers.

Adapting for additional investment needs during the ED3 period

Q14. What are your views on the proposed timing of the RESP reopener windows in years 2 and 4 of ED3?

- Please refer to our response outlined under Questions 6 and 15.

Conceptual models for ED3 delivery

Q15. What are your views on the combination of mechanisms presented in the two conceptual models? Do they effectively illustrate how different regulatory tools could be packaged to support strategic delivery in ED3?

- GLA would prefer Model 1 – Plan and adapt – as it reflects the significant uncertainty present in the London region in regard to future energy needs. We agree with the principle of strengthening DNO delivery accountability, on the basis that potential consumer harm from under-delivery is greater than ever before given significant investment needs to meet decarbonisation and growth targets.
- We are aware of several instances where delays to essential reinforcements have had knock-on impacts to connection timeframes, creating additional impacts on investments and customers within the Greater London area.

- This has also manifested in a few instances where small connections requests in key growth areas within London have indicated enormous customer reinforcement costs because of the High-Cost Cap (HCC). We recognise the need of an HCC to protect consumers from the cost of less efficient network investment. However, we believe that the HCC should not be acting as a financial disincentive to customers where they are bringing forward reasonable development in areas that benefit from robust spatial growth forecasts and adopted spatial plans. We believe this example emphasises the need for strengthening DNO delivery accountability and the importance of a more proactive approach to investment, in the interests of reducing burdens to customers looking to connect.
- Regarding the assessment of delivery accountability options, please refer to the concerns outlined in our response to Question 6 as to the shortcomings with the robustness of the tRESP to inform investment need by the networks for ED3. As such, we do not believe that delivery accountability options that primarily measure delivery against tRESP would be effective in securing the best outcome for customer connections in the London region.
- In terms of the balance between certainty and flexibility, flexibility should be prioritised only where this results in greater ambition and speed of network delivery.
- We would also expect Ofgem to provide clarity as to how proposed urgent need for intervention within the demand connection queue would be factored into the emerging ED3 approach for delivery accountability. This emphasises the need for flexibility in the chosen approach, particularly given the uncertainty and impact of major demand connections such as for data centres, of which London faces a significant queue with many looking to connect at distribution level.
- As a result, we would see greater value within Ofgem's conceptual model of Plan and Adapt to best respond to emerging demand growth and uncertainties, acknowledging our previous concerns with the tRESP.

Q16. In the context of ED3, do you consider that we should put more emphasis on Plan and Adapt or Plan and Deliver — to be more appropriate for achieving the guiding principles set out in Paragraph 3.5? Please explain your reasoning.

- Please refer to our response outlined under Question 15.

Connections

Q18. Do you agree that the connection types of 'minor' and 'major' should be redefined? If so, do you have thoughts on how they should be redefined, via voltage works required, customer type, a blend of the two, or a split not considered here?

- Further clarification would be helpful on the recategorization of connections. Option 1 requires splitting connections by voltage work required – ‘Major’ for everything about or requiring a Transmission Impact Assessment (TIA). How would this be implemented given that the TIA threshold is different for generation and demand connection projects, and that the presence of access products in London (e.g., the ramping solution introduced to address the capacity constraints in west London) allows for some schemes to avoid a TIA?

Q19. Do you have views or suggestions on how redefining connection types, with potentially more types being introduced, will be able to be operationalised at this level of granularity? See Paragraph 4.18.

- Customers tend to seek connections at different stages of project progression. For example, data centres tend to seek connections earlier in the process, prior to securing planning permissions, whereas housing developers do so at a later stage given the cost associated with securing power connections.
- On the proposal to redefine connection types by customer types, further clarification is needed on how the risk of different customer types and their behaviours would be considered. Given the varying risk profile of different development types (e.g., affordable housing versus data centres), the process should ultimately aim to produce greater equity in connection access.
- Further, our regular engagement with the development industry shows a widespread concern around technical complexity in navigating the connection process.
- For this reason, we believe Option 2 (splitting connections by customer type) may best serve customers by providing a clearer, non-technical and transparent categorisation. This would also help reduce risk on behalf of customers as there would be much greater transparency as to their connection process from initial steps.
- Option 1 will introduce complexity and uncertainty to customers, given it may not be clear what process a connection is expected to take until initial feasibility is undertaken to confirm what voltage level of works may be required. Option 2 can also form a stronger basis for create a more transparent and understandable framework for engagement with development and industry more broadly on a wide range of other aspects. This includes better signposting the role of flexibility and relevant connection products (such as ramped) to particular development and technology types.
- Within Option 2, we would like to propose that Ofgem consider further distinguishing between customer types based on their varying impact on the network. For example, ‘commercial’ and ‘industrial energy intensive’ customer types can be further broken down into major energy users and non-major

energy users, to account for the unique considerations affiliated with users such as data centres.

- The November 2025 Ofgem letter² on the demand connections update illustrates the risks associated with the recent surge in demand connection application, particularly with demand projects such as data centres. Given Ofgem's intention to explore the opportunity for development-type specific queue management criteria, we believe an additional connection type definition for 'major energy users / data centres' would set clearer expectations to these more bespoke customers. This would also bring benefit to Ofgem in enabling better alignment with broader development and planning processes, which can help support Ofgem's intention to consider different data identifiers for less viable projects that may lead to inefficient network investment.
- Considering a more nuanced approach to categorising connection types can support better allocation of resources and overall network planning. This can create more equitable outcomes and more timely connections, which is in the interest of all customers.

Q26. Do you think we should financially incentivise the TTC metric in order to accelerate connections and achieve the right outcomes? Are there other changes we should consider? How would any change sit alongside the current incentives?

- GLA engagement with London developers and industry indicates that timeliness as well as certainty of connection timeframes is critical, alongside cost. This contrasts with Ofgem's statement in paragraph 4.67 that "the timeliness of connections is not always the most pressing matter for customers".
- It should also be considered that delays in connections can have knock-on impacts on securing investment and project viability, particularly for housing schemes. This reinforces the need for TTC to remain a core metric, along with the quality of offer and the process offered to applicants.
- We are strongly supportive of the intended outcome to accelerate connections and would welcome Ofgem to consider different options to achieve this, including the NIC recommendation to financially incentivise the TTC metric to improve outcomes for customers.

² [Demand connections update](#)

Q27. Do you see value in incentivising SLAs/minimum standards? How should it be done and are there any associated risks or impacts?

- On the value of Service Level Agreements, we agree that there needs to be benchmarks to understand what is an acceptable TTC for different projects. Please see our response to Question 19 for further details on the value of ensuring timeliness in connection offers.
- This may need to take into account regional issues such as where time to connect is extensive due to transmission constraints, such as in the case of the west London capacity constraints, and how this feed upwards to transmission to encourage more proactive investment.

Consumer vulnerability

Q39. Do you think the targets for the CVI metrics should be made common across DNOs? Why?

- Consistency in terms of Consumer Vulnerability Indexes for DNOs would be highly beneficial. It will make it easier for consumers to understand what they can expect and importantly make it easier for organisations, like advice giving organisations and representative groups like Deaf and Disabled Peoples Organisations, to raise awareness of what people can expect and improve access.
- A recent report from Policy in Practice, Missing Out 2025³, showed that social tariffs and energy support account for the highest number of missed claims across all benefit types. A major reason for low take up is lack of awareness amongst vulnerable households. Any policy change, such as a move to consistency for Consumer Vulnerability Indexes, would therefore be welcome.
- Further, alignment between DNOs would enable better sharing of learning across the sector by allowing meaningful comparisons.

Q40. Do you think the AVR should be carried forward as an ODI-R to ED3, and why? If it is carried forward, are there any changes you think should be made to the structure and content?

- We support an Annual Vulnerability Report for DNOs based on the principle of accountability and transparency.
- An Annual Vulnerability Report can act as a focal point for analysis and learning which might otherwise be lost. Such reports can also act as points of comparison across the sector and allow external stakeholders to scrutinise DNOs in terms of responding to the needs of vulnerable customers.
- A consistent CVI, as proposed in Q39, would improve comparisons between DNOs and help share best practice.

³ [Missing Out 2025 | Policy in Practice](#)

Energy efficiency

Q41. Do you have any views on our proposal for DNOs to play a bigger role in the delivery of energy efficiency and low carbon measures?

- The consultation indicates that several stakeholders argued in favour of DNOs working in partnership with local and regional actors, drawing on their physical presence in their network areas to enable a more area-based focus. GLA would also prefer this approach.
- Given the concurrent changes with the introduction of the RESP, SSEP, and CSNP, GLA is strongly in favour of the critical role that existing LAEPs can offer as an important factor.
- We await details on the expanded role of the DNOs in energy efficiency to provide further views.

Environmental framework

Q43. What criteria should be prioritised in a structured evaluation of DNOs' EAP for ED3?

- Regarding the criteria for the “Flexible use of underground allowance in EAPs” – DNOs are to receive an undergrounding UOLI allowance to support removal of overhead lines in protected landscapes such as national parks and areas of outstanding natural beauty. Further clarity is requested on whether included in this are urban areas where growth has seen new OHL in dense urban areas that now present amenity issues to residential developments and critical growth areas.
- Regarding the best practice measures – each DNO is to set out a potential measure available to address each of the EAP, such as collaborative initiatives (e.g., shared methodology, industry-agreed standards). It would be useful to understand how this can link to the LNRS and Nature Recovery more broadly.

Q44. Is the proposed approach to SF_6 - focusing on reducing both absolute emissions and the total SF_6 bank - appropriate and proportionate?

- Within this approach, it should be considered that while the environmental impact of reducing polluting gases is important, it also needs to be recognised that within areas such as London, competition for space is high. There needs to be a balance in supporting more compact substation designs, given that air insulated substations can be significantly larger.

Digitalisation and data

Q53. Do you agree that DSAPs should include outcome-linked digital spend? Why?

- The GLA supports Ofgem's proposals to leverage data and innovation to deliver smarter networks. We agree that strengthening digitalisation foundations and enhancing data sharing are essential to creating a more resilient and efficient energy system.
- The measures outlined in the Smarter Networks section align closely with the Mayor's Upgrading London's Infrastructure strategic programme, which prioritises data-driven infrastructure planning to enable coordinated investment and minimise disruption. Modernising London's infrastructure, including its data, is critical to unlocking economic growth and supporting the city's transition to net zero.
- We also support Ofgem's proposals to maintain innovation incentives and recognise the role of AI in network optimisation. However, as highlighted in our previous response, AI-driven growth (such as the expansion of data centres) must be carefully balanced against grid capacity constraints. Ofgem should ensure that innovation funding and regulatory frameworks take account of the cumulative impact of energy-intensive sectors on network planning.
- Furthermore, we welcome Ofgem's efforts to improve interoperability through the Data Sharing Infrastructure (DSI). While the GLA currently has access to some sensitive energy data from boroughs and DNOs via bespoke legal agreements, this access is limited to boroughs and utilities within London.
- Such restrictions hinder opportunities for third-party innovation and creative solutions. We therefore strongly support the development of the DSI, which will enable secure, standardised, and interoperable data sharing across the energy system. This will allow innovators, industry bodies, and market participants to access critical energy data, helping accelerate decarbonisation and deliver better outcomes for consumers.

Distribution System Operator (DSO)

Q 63. How should DSOs incorporate flexibility services and connection process improvements into their network planning approach to ensure timely, efficient, and predictable connections? Should this be incentivised, and if so, how?

- The GLA supports the proposal for the DSO to play a central, strategic role in planning their network on an enduring basis through the price control, ensuring that local energy systems are developed in a way that is proactive, data-driven, and aligned with whole system outcomes and strategic plans.
- We suggest that this be aligned to regional and local priorities as well to consider available bottom-up data.
- For example, where available, local insights such as LAEPs can support the proposal for "the creation of long-term integrated network development plans by identifying future system need via tRESP", as well as "collaborating across the energy system and contributing relevant data and insights".

- Further clarity would be appreciated on the expanded scope of “Facilitating efficient connections by ensuring network planning supports to show clear visibility of available capacity.” There should be clear alignment between what the Open Data demonstrates compared to the experience of submitting and receiving connection offers in particular areas. Open data currently shows broad availability of capacity. However, these do not always reflect the reality when people come to make investment decisions and follow up with DNOs.

Flexibility

Q 67. Are further incentives required to incentive and encourage the use of flexibility in line with our approach for ED3?

- On flexibility, the consultation indicates that DNOs are to use flexibility for important use cases such as “rapid connection times where network build out cannot happen fast enough, or to smooth a programme of network reinforcement, to avoid supply chain constraints or an inefficient spend profile”.
- In the case of the latter, DNOs should not be using flexibility to defer the delivery of infrastructure that has been planned for ED3 into future control periods. It would be helpful to understand how this is prioritised in the context of different types of customers potentially receiving different connection times in different areas. For example, the ongoing capacity experience in west London where there is significant uncertainty from smaller demand projects in progressing to connection in a timely manner, compared to the experience of the data centre industry more nationally featuring significant timeframes in excess of expectations⁴.
- The consultation indicates that we want to avoid an outcome where the use of flexible connections could be prioritised at the expense of network build, and customers end up paying more. The GLA would like to emphasise that the solution should consider that both flexibility and investment are triggered at the same time, with the former acting as a short-term solution and the later as long-term. The SSEN Community Smart Access programme⁵ is an illustrative example of this approach.
- We can signpost to SSEN’s Strategic Development Plans (SDPs) as a useful exemplar of a more spatial approach to network planning that is useful in tying together a longer-term view of network need in particular locations. It may be beneficial to support the wider rollout of these strategic plans. SDPs provide a critical link with Local Planning processes given similar timeframe and spatial perspective.

⁴ [Report: Powering Great Britain’s Data Centre Ambitions](#)

⁵ [New SSEN-led project offers options of faster connections for decarbonised new homes - SSEN](#)

Network Asset Risk Metric (NARM)

Q 90. Do you agree with our approach to enabling the future effects of climate change on asset deterioration to be modelled in NARM?

- As indicated in the GLA's response to the RIIO-T3 consultation, we would support approaches to improve the NARM framework where this leads to better outcomes in relation to resilience and risk management across the electricity and gas sectors.
- Further clarification would be beneficial on expectations within NARM as to the calculation of risk where it comes to system and network consequences.
- We would welcome an approach where differentiated funding mechanisms are introduced to protect vulnerable consumers and ensure additional costs are not disproportionately impacting customers.

Resilience re-opener

Q 109. Do you agree with our proposal approach to introduce a resilience re-opener? Why?

- The proposed single consolidated re-opener mechanism should consider vulnerable consumers to ensure better resilience of the grid does not come at the expense of household resilience to a wider set of potential shocks. Disproportionate impacts on vulnerable people are a key chronic risk. Please see our response to Q 39 and 40 under Consumer Vulnerability.

Cyber

Q 110. Do you agree with our proposed approach to cyber resilience in ED3, and do you have any suggestions for improvements?

- As indicated in the GLA's response to the RIIO-T3 consultation, we support the inclusion of a resilience re-opener which recognises the need for flexibility with the on-going work by NESO and Government (including the recently published UK Government Resilience Action Plan and the forthcoming Cyber Security and Resilience Bill).
- We would like to see further rationale as to the timing of the proposed reopener windows (April 2028 and April 2030). These windows should reflect the pace of work by Government on the establishment of new resilience standards.

Supply Chain and Workforce

Q 118. Are there features of the price control framework that create barriers to sourcing from UK suppliers or SMEs? How could Ofgem enable greater social value

in a way that protects consumers, ensures value for money, and remains compliant with trade obligations?

- Welcome the government's Clean Energy Jobs Plan⁶ which responds to the NIC report's recommendation that Government should identify the skills challenges and actions required to ready the workforce to deliver the energy transition.⁷
- The Plan expects London to see significant growth in demand for clean energy jobs (direct jobs) to 2030 with the strongest increases in Construction and building trades and Skilled metal, electrical and electronic trades.
- Key actions of the London Growth Plan⁸ are investment to decarbonise London's infrastructure and build climate resilience; a skills system that is employer led and trains people for the jobs to deliver this.
- The Mayor set out his ambitions for London's skills and employment system in the October 2025 Inclusive Talent Strategy⁹, published jointly with London Councils.
- Employers are the centre of this approach through new Sector Talent Boards. The Mayor will launch a Construction and Built Environment Talent Board in Spring 2026. The Board will bring employers together from the sector to identify priority skills needs, including those important for the clean energy transition, and shape training provision delivered in London, prioritising that funded by the GLA.
- We would recommend further changes to national skills policy to support the work of the Boards. These include:
 - Regional flexibility for the Growth and Skills Levy to allow London to pilot local levy pooling to expand SME access and investment in apprenticeships and training support the clean energy transition and building climate resilience.
 - Allowing for further funding and full regional flexibility to be built into the Skills & Employment pillar of the Integrated Settlement. This will allow London to align devolved funding behind green growth and join up employment, skills and health outcomes.

⁶ [Clean energy jobs plan \(HTML\) - GOV.UK](#)

⁷ [\[ARCHIVED CONTENT\] Electricity distribution networks: Creating capacity for the future - NIC](#)

⁸ [London's growth plan - London Growth Plan](#)

⁹ [Inclusive Talent Strategy | London City Hall](#)