

Jonathan Brearley
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

Sent via email to: Jonathan.Brearley@ofgem.gov.uk
CC: ED3@ofgem.gov.uk; [REDACTED]

9 January 2026

Subject: Sector Specific Methodology Consultation — Electricity Distribution Price Control (ED3)

Dear Jonathan,

I write on behalf of the Greater Manchester Combined Authority (GMCA), and would like to thank you and colleagues from Ofgem for facilitating a meeting with GMCA on the ED3 Sector Specific Methodology Consultation on 7th January 2026. We note that the consultation response deadline has passed but we trust that the information provided at that meeting and within this letter can be formally acknowledged and inform the final methodology.

GMCA welcomes ED3's focus on whole-system, place-led delivery and we believe that there is strong alignment with many aspects of the GMCA. The development of the Greater Manchester Infrastructure Plan which is aligned to new Mayoral CA statutory requirements and priorities such as;

- Spatial Development Strategy
- Our Integrated Pipeline and National Infrastructure Pipeline interface
- Implementation of Collaborative Street Works (place-based “dig once” coordination)
- Extending the Bee network (bus, tram, train and active travel travel)
- Developing the governance of the RESP/NESO (regional energy planning interfaces)
- Strengthening engagement and collaboration on strategic priorities with SP Electricity North West.
- Commitments to Social Value — delivering social benefits, skills and jobs from infrastructure investment

Collaboration

The GMCA Strategic Infrastructure Board (SIB) is a central convening mechanism through which we are strengthening delivery partnerships with regulators, government, local authorities and with key infrastructure providers to ensure that critical enablers like grid reinforcement, integrated water management, and collaborative street works are in place to meet the region's growth, housing, and sustainability targets.

Our collaboration with SP ENWL is a model of this approach:

- Structured bi-weekly engagement and a forward plan with agreed terms of reference.
- Joint development of a Local Authority engagement dashboard, supporting both GMS delivery and ENWL's DSO performance reporting.
- Evidence of partnership maturity and alignment, as demonstrated in submissions to Ofgem's DSO Performance Panel and ongoing work to formalise escalation routes and delivery standards.

Our collaborative approach supports government net zero, sustainable growth, and infrastructure goals in line with the National Infrastructure Strategy. Integrated, place-based energy planning aligns investments with national decarbonisation and local needs. RESP/tRESP engagement enables Greater Manchester to coordinate housing, transport, and energy projects. Proactive investment, flexible systems, and improved connections drive electrification and low-carbon delivery, while strong environmental and accountability measures ensure long-term sustainability. Efficient street works and "dig once" strategies provide future-ready infrastructure through 2050.

Within this context we have focused our response on the following elements of the methodology:

A. Strategic Network Planning and Investment

- **Regional Energy Strategic Plans (RESPs/tRESPs):** We are engaging with NESO's transitional plans (tRESPs) as a foundation for DNO planning, with strong integration of local and regional priorities, including those of GMCA.
- **Long-Term Integrated Network Development Plans:** We endorse expectations on DNOs to align investment with national decarbonisation goals and local growth, using RESP/tRESP outputs to ensure place-based needs are embedded.
- **Proactive Investment:** We welcome programmatic approaches for LV reinforcement and unlooping legacy connections—highly relevant to urban growth and electrification across Greater Manchester.
- **Flexibility and re-openers:** We encourage targeted uncertainty mechanisms and in-period re-openers so ED3 can align with the Greater Manchester Integrated Pipeline and the evolving integrated settlement from government—enabling timely responses to validated local need.
- **Long term planning:** Fully support the requirement to prepare long-term, integrated network development plans extending out to 2050—well beyond the traditional 5-year price control horizon.

B. Connections and Customer Service

- **Connections reform:** We support reforms to speed up and improve connections, especially for low-carbon technologies (LCTs) and growth-related developments (e.g., housing, data centres).
- **Redefining connection types:** Proposals to better reflect customer experience and streamline processes—with appropriate incentives for both smaller (domestic/LCT) and larger (industrial/commercial) connections—are welcome.
- **Vulnerable customers:** We support an enhanced focus on vulnerability, including changes to the Priority Services Register and targeted incentives that safeguard equity.

C. Responsible and Sustainable Business

- **Environmental framework:** Strengthened requirements to cut emissions (e.g., oil leaks), improve biodiversity, and standardise reporting will support resilient, responsible delivery.
- **Energy efficiency coordination:** We see value in DNOs playing a greater role alongside local authorities (including GMCA) to coordinate energy-efficiency and low-carbon measures.

D. Smarter and More Resilient Networks

- **Digitalisation and data:** We support stronger expectations for data sharing, interoperability, and digital tools that enable flexibility and whole-system outcomes.
- **Innovation:** Continued support for innovation funds and deployment—focused on consumer/system benefit—remains important for place-based problem-solving.
- **Resilience:** We welcome strengthened frameworks for climate resilience, asset health (NARM), and cyber security, with mechanisms that permit in-period adaptation to emerging risks.

E. Delivery and Accountability

- **Business Plan Incentive (BPI):** Stronger incentives for ambitious, deliverable plans and clear accountability for outcomes are essential.
- **Supply chain and workforce:** Requiring 10-year delivery strategies covering workforce and supply chains will help ensure timely, efficient execution and build local capability.

F. Collaborative Street Works and the “Dig Once” approach

- GMCA asks that the ED3 methodology explicitly recognizes and incentivizes **Collaborative Street Works** in Greater Manchester building on the “dig once” approach already supported by Ofgem (and Ofwat) in London - to reduce disruption, accelerate net-zero delivery, and maximise social value.

Ongoing Ofgem–GMCA engagement

We value ongoing dialogue with Ofgem and propose a regular dialogue and engagement through the ED3 design and implementation to ensure the smooth delivery of projects.

We appreciate the opportunity to contribute and would welcome acknowledgement of our response within your consultation report when this is published. We look forward to continued collaboration as you finalize the consultation response report and the ED3 methodology in Spring 2026.

Yours sincerely,

Caroline Simpson

Group Chief Executive, GMCA, GMFRS & TfGM

Peter Emery

Chair Greater Manchester Strategic Infrastructure Board