

RIO-3 team, Ofgem

8th January 2026

Dear Ofgem,

Response to **Ofgem's Statutory Consultation on the RIO-3 Licence Drafting Modifications**

EDF is the UK's largest producer of low carbon electricity. EDF operates low carbon nuclear power stations and is building the first of a new generation of nuclear plants. EDF also has a large and growing portfolio of renewables, including onshore and offshore wind and solar generation, as well as energy storage. EDF is therefore driving the transition towards 'an Electric Britain' – a secure, affordable, low-carbon future for everyone. As Britain's biggest generator of zero carbon electricity, we are investing more than £100 million weekly in Britain's electricity infrastructure. We supply millions of customers with electricity and help homes and businesses switch to electricity for heating, transport and industrial processes.

The RIO-3 price control covers a critical period as the electricity networks scale up to meet the Clean Power 2030 challenge. This is also coming in the context of ongoing consumer affordability and debt challenges in the sector. As a developer of new generation and a supplier, we know how important it is that the network companies are subject to effective scrutiny on cost and delivery.

This next period will see a significant step-change in the number of transmission projects being delivered. As mentioned in our response to Ofgem's RIO-3 Draft Determinations, we are significantly concerned about cost uncertainty stemming from long-term network expansion when setting tariffs for domestic and non-domestic customers. We are also concerned about the ongoing consumer costs associated with network constraints while that expansion is still underway. A key issue for suppliers is visibility of the cost and timing of large network reinforcement projects that drive demand tariff changes and these constraints. We believe this requires an urgent and radical improvement in the level of transparency.

Ofgem should mandate the TOs to provide full, ongoing transparency over project progress and the future pipeline. This could take the form of a central register of projects with TO's providing mandatory updates to spend profiles and operational timing. This enhanced information should be used by NESO to provide more accurate long-term charging forecasts. This will help ameliorate issues regarding transmission charge stability and allow suppliers to set customer tariffs without pricing in excessive cost risk.

We think this could be appropriately reflected in the ET licences' Special Conditions Section 9, with wording to the effect of:

The licensee must ensure full, ongoing transparency through an accessible register of the Licensee's planned network reinforcement investments exceeding £[50] million. This should include mandatory updates every [6] months to forecast spend profile per project and current estimates of the major delivery milestones of each planned project.

We look forward to continuing to work with Ofgem in the post-consultation stages. Should you wish to discuss any of the issues raised in our response or have any queries, please contact me or Matthew Ball at Matthew.Ball2@edfenergy.com.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "AM Cox".

Mark Cox
Head of Nuclear and Wholesale Market Policy