

Consultation

RIIO-ET3 Load Re-opener: May 2026 submission window Draft Determinations - Eligibility Assessment annex

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We are consulting on our Draft Determination of Load Re-opener applications submitted by Electricity Transmission Owners (ETOs) in the May 2026 submission window.

This document sets out our decision-making regarding Eligibility Assessment applications received from National Grid Electricity Transmission plc (NGET) and Scottish Hydro Electric Transmission plc (SHET). For each application received, we confirm whether or not the project is eligible for the Load Re-opener, our justification behind the decision, as well as the determined Assessment Track.

We are consulting on our proposals to award Pre-Construction Funding (PCF) for all projects we consider eligible to apply for full project funding under the Load Re-opener. We are also consulting on the needs case of any proposed Assessment Track 2 projects. For Assessment Track 2 projects, the next Assessment Stage will be Project Assessment (PA), where full project funding will be determined. The next Assessment Stage for any projects confirmed as Assessment Track 3 will be Needs Case Assessment (NCA). We will consult on the needs case for those Assessment Track 3 projects at a later date, following receipt of NCA applications from the ETOs.

Once the consultation is closed, we will consider all responses. We particularly welcome responses from people with an interest in electricity transmission (ET) networks. We would also welcome responses from other stakeholders and the public.

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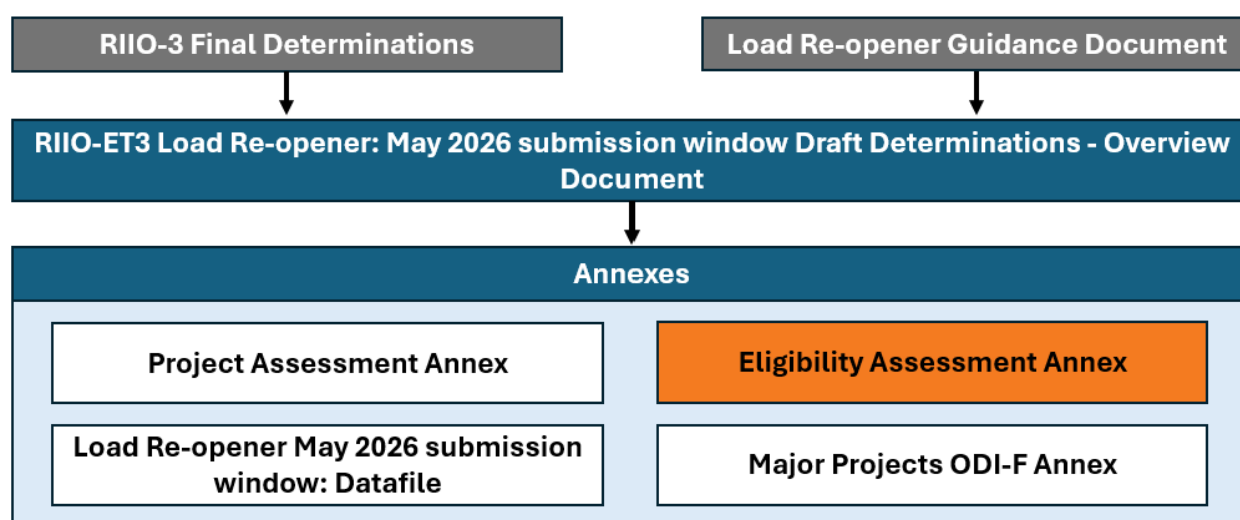
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1. Introduction

- 1.1 This document is one of the annexes published alongside the RIIO-ET3 Load Re-opener May 2026 Draft Determinations. It focuses on the Eligibility Assessment (EA) stage of the Load Re-opener regulatory process.
- 1.2 Please refer to the RIIO-ET3 Load Re-opener May 2026 submission window Draft Determinations - Overview Document (as set out in Figure 1 below) for general information on:
- our¹ consultation approach, stages, and how to respond; and
 - the Load Re-opener regulatory processes and assessment approach.

Figure 1: Navigating our Draft Determinations



What are we consulting on?

- 1.3 We are consulting on:
- any Pre-Construction Funding (PCF) allowances and our associated methodology;
 - any decisions relating to needs cases (ie Early Options Needs Case approval as part of Assessment Track 2 or NCA as part of Assessment Track 3); and
 - specific decisions relating to individual projects where required (eg where we propose to reject the eligibility of a project).
- 1.4 Additionally, for PCF associated with our EA decision-making, we have included draft directions in Appendix 3 of this document, which sets out for consultation

¹ The terms 'we', 'us', 'our' refer to the Gas and Electricity Markets Authority (the Authority). Ofgem operates under the direction and governance of the Authority.

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the text of our proposed directions for NGET and SHET. We will issue directions to set out any adjustments alongside our Final Determinations.

Related publications

1.5 This document is intended to be read alongside:

- RIIO-ET3 Load Re-opener: May 2026 submission window Draft Determinations - Overview document
- ETO published May 2026 Load Re-opener applications:
 - NGET - [RIIO T3 Re-openers | RIIO-T3](#)
 - SHET - [Our RIIO-T3 Business Plan - SSEN Transmission](#)
 - SPT - [RIIO-T3 Load Re-openers - SP Energy Networks](#)
- Load Re-opener Guidance and Submission Requirements Document: [Network price control 2026 to 2031 \(RIIO-3\) guidance | Ofgem](#)
- Re-opener Guidance and Application Requirements Document: [Network price control 2026 to 2031 \(RIIO-3\) guidance | Ofgem](#)
- RIIO-3 Final Determinations: [RIIO-3 Final Determinations for the Electricity Transmission, Gas Distribution and Gas Transmission sectors | Ofgem](#)
- RIIO-3 electricity transmission licences: [Modifications to the RIIO-3 licences and associated documents | Ofgem](#)

2. Summary of our Draft Determinations

- 2.1 Assessment of a project's eligibility is the first stage for all Load Re-opener projects, irrespective of the Assessment Track.
- 2.2 Some projects were confirmed as eligible for the Load Re-opener in our RIIO-ET3 Final Determination (FD) (Assessment Track 1 projects). For all other projects, eligibility is determined during the RIIO-ET3 price control period. ETOs must submit Eligibility Letters, which we assess to determine the project's eligibility for the Load Re-opener, as well as the appropriate Assessment Track (either 2 or 3).
- 2.3 Eligibility Letter submissions must meet the requirements set out in the Load Re-opener Guidance, dependent on the proposed Assessment Track, in order to be eligible. Through an Eligibility Letter, ETOs may apply to:
- determine whether the project is eligible for the Load Re-opener; or
 - determine whether the project is eligible for the Load Re-opener and get approval of early optioneering and needs case (referred to as 'Early Options Needs Case').
- 2.4 A project will be allocated to Assessment Track 2 if the preferred option is PASE² aligned or, where the preferred option is not PASE-aligned, the ETO has demonstrated that the justification for its proposed solution is clear and uncomplicated, and the estimated total project direct costs are below the materiality threshold of £300m.
- 2.5 A project will be allocated to Assessment Track 3 if there is not yet a preferred option, the preferred option is non-PASE aligned and cannot be justified without the requirement for a detailed optioneering assessment, and/or the estimated total project direct costs are above the materiality threshold of £300m.
- 2.6 If we determine a project is eligible for Assessment Track 2 or 3, a Pre-Construction Funding (PCF) allowance will be set, with a Price Control Deliverable (PCD) applied in line with Special Condition 3.15 (Pre-Construction Funding Re-opener and Price Control Deliverable). PCF provides ETOs with funding at early stages of project development to continue to design and seek consent for large ET investments.

² PASE (Pre-Approval of Solutions by Engineering) is Ofgem's framework for pre-approved engineering design solutions. A project being PASE aligned will minimise our need for detailed optioneering and engineering reviews. See the Load Re-opener Guidance Document for more details.

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- 2.7 Once a project has been developed further, the ETOs must submit the project for the next Assessment Stage of the relevant Assessment Track (ie Needs Case Assessment (NCA) or Project Assessment (PA)).
- 2.8 Table EA1 lists all the Eligibility Letter submissions received in the May 2026 Load Re-opener submission window. It summarises the ETO proposals, our view on eligibility and Assessment Track, as well as the proposed PCF funding to be granted for eligible projects. Our approach for setting proposed PCF allowances is set out in further detail in the Thematic Issues section.

Table EA1: Summary of the May 2026 Load Re-opener Eligibility Letter submissions

Project Name	ETO	Proposed Assessment Track by ETO	Assessment Track proposed/decided by Ofgem	Submitted forecast project cost (£m)	Adjusted forecast project cost (£m)	PCF Allowance (£m)
Aberthaw – Site Strategy	NGET	Track 2	Track 3	530.300	503.744	40.219
Banwen (Rhigos B)	NGET	Track 2	Track 2	196.500	186.660	14.692
Berkswell	NGET	Track 2	Track 2	76.600	72.764	5.831
Blyth 400kV Site Strategy	NGET	Track 2	Track 3	400.900	380.824	29.733
Bodelwyddan 400kV Extension	NGET	Track 2	Track 3	194.700	184.950	14.717
Bolney 400kV Site Strategy	NGET	Track 2	Track 2	102.600	97.462	7.736
Bridgend	NGET	Track 3	Track 3	319.500	303.500	23.946
East Claydon – Enderby – Patford Bridge 1 and 2 OHL	NGET	Track 2	Track 2	167.800	159.397	12.439
ETRE	NGET	Track 2	Rejected	40.670	N/A	N/A
Farmoor	NGET	Track 2	Track 3	136.200	129.380	10.164
Feckenham – Hams Hall OHL	NGET	Track 2	Track 2	54.300	51.581	3.985

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Project Name	ETO	Proposed Assessment Track by ETO	Assessment Track proposed/decided by Ofgem	Submitted forecast project cost (£m)	Adjusted forecast project cost (£m)	PCF Allowance (£m)
Feckenham – Ironbridge OHL	NGET	Track 2	Track 2	79.700	75.709	5.908
Imperial Park 400/132kV Upgrade	NGET	Track 2	Track 2	60.450	57.423	4.632
Ince SGT Extension	NGET	Track 2	Track 2	61.520	58.439	4.597
Keadby (KEAD4)	NGET	Track 2	Track 2	53.690	51.001	4.088
Kingsnorth 400kV Extension	NGET	Track 2	Track 2	96.700	91.858	7.291
Laleham 132kV Extension	NGET	Track 2	Track 3	217.400	206.513	16.392
Lower Frankton 400kV AIS Substation	NGET	Track 3	Track 3	347.700	330.288	25.694
North West London	NGET	Track 2	Track 3	400.500	380.444	29.995
SCRE (COTT4 – STAY4) and WRRE (WBUR4 – RATS4) OHL	NGET	Track 2	Track 2	157.800	149.898	12.039
Tees Dock Substation	NGET	Track 2	Track 3	657.500	624.574	49.081
Tilbury 275kV Rebuild - RIIO T3 Holistic Site Strategy	NGET	Track 3	Track 3	231.770	220.164	17.472
Warley 275kV Substation Replacement	NGET	Track 2	Track 3	389.090	369.606	29.053
Willington 132kV Rebuild	NGET	Track 2	Track 2	43.200	41.037	3.250
Energy Isles (Shetland)	SHET	Track 2	Track 2	52.369	52.038	3.967

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Project Name	ETO	Proposed Assessment Track by ETO	Assessment Track proposed/decided by Ofgem	Submitted forecast project cost (£m)	Adjusted forecast project cost (£m)	PCF Allowance (£m)
Knocknegael Farigaig HVP	SHET	Track 2	Track 2	215.392	204.822	15.955
Loch Na Cathrach Cluster	SHET	Track 2	Track 2	162.618	162.618	12.956
Shetland on Island Infrastructure	SHET	Track 2	Track 3	1160.995	1033.330	81.462

3. Our Eligibility Assessment decision-making

Our assessment process

- 3.1 In accordance with the Load Re-opener Guidance and Submission Requirements, ETOs must provide an Eligibility Letter that includes early-stage project information, such as project drivers, shortlisted options, costs, PCF requirements, delivery timelines, technical details, and project interactions with other projects. If the ETO is applying for Assessment Track 2, and so requesting eligibility and Early Options Needs Case approval, a preferred option must be proposed, as well as a high-level Cost-Benefit Analysis (CBA) and Whole Life Cost Analysis (WLCA).
- 3.2 Our approach to assessing Eligibility Letters varies depending on the purpose of the ETO's application (eg whether it is eligibility only or eligibility and Early Options Needs Case). This approach ensures that a proportionate amount of regulatory scrutiny is applied to each application, accelerating our assessment where certainty exists while ensuring robust consumer protection for projects with greater uncertainty.
- 3.3 Where the purpose of the ETO's application is to establish eligibility only (ie Assessment Track 3), our assessment focuses on:
- confirming the network need the ETO is seeking to address;
 - understanding the credible options under consideration; and
 - reviewing indicative or average cost ranges associated with those options to enable us to set an appropriate Pre-Construction Funding (PCF) allowance.
- 3.4 This level of assessment is appropriate for us to determine that the project meets the criteria for the Load Re-opener mechanism and can progress to NCA stage.
- 3.5 Where the purpose of the application is to establish eligibility and Early Options Needs Case (ie Assessment Track 2), our assessment will consider in addition to paragraph 3.5:
- the suitability of the preferred design choice of the ETO and quality of optioneering;
 - whether the project is PASE aligned, and if not, whether a non-PASE aligned option is justified sufficiently; and
 - the economic case for the project from the perspective of energy consumers.
- 3.6 Given the nature of ETO applications at the eligibility stage, our assessment approach is largely qualitative. This reflects both the early stage of project development, where there is greater uncertainty around costs, and our focus on

the optioneering process and the project's needs case. It also reflects the relatively limited risk to consumers at this stage, as eligibility assessment does not confirm the needs case or provide full project funding. To obtain Early Options Needs Case approval, projects must meet predefined requirements that help mitigate consumer risk by ensuring that only appropriate projects progress to PA.³

- 3.7 Where feasible, we also undertake quantitative assessment, including consideration of early cost estimates and analysis of CBA and Whole-Life Cost Analysis (WLCA) assessments where provided. Although costs remain uncertain at this stage, high-level estimates help inform more detailed analysis at subsequent Assessment Stages and allow us to identify and address any initial concerns or anomalies. This assessment is required to ensure we set appropriate PCF allowances. A more comprehensive quantitative analysis is carried out at PA, where final costs are set and granted PCF allowances can be reconciled.

Combined Eligibility Letter and Needs Case Assessment (NCA) applications

- 3.8 A number of applications were submitted by NGET in the May 2026 window with the intent of combining two Assessment Stages into a single re-opener assessment window. These Assessment stages consist of:

- Stage 1: Eligibility Assessment; and
- Stage 2: Needs Case Assessment (NCA).

- 3.9 The next proposed Assessment Stage by NGET for these applications is PA. As such, we consider there is no material difference between these 'combined' applications and an Eligibility Letter application in Assessment Track 2. Accordingly, we have classified these 'combined' applications in this document as proposed Assessment Track 2 (despite NGET proposing Assessment Track 3 in its submission documents). We consider this proportionate given this is the first application window of a new re-opener mechanism, however, in the future we will not accept 'combined' applications and will treat applications solely based on the proposed Assessment Track.

- 3.10 The projects which were submitted as combined Eligibility Letter and NCA are:

- Berkswell.
- East Claydon - Enderby – Patford Bridge 1 and 2 OHL.

³ Requirements for Eligibility Letters, including the specific requirements if the ETO is seeking to establish Early Options Needs Case, are listed in the Load Re-opener Guidance and Submission Requirements document, under 'Stage 1 Template – Eligibility Letter'. More information can also be found in 'Appendix 3 – Justification guide' in the same document.

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- Feckenham – Hams Hall OHL.
- Feckenham – Ironbridge OHL.
- Imperial Park 400/132kV Upgrade.
- SCRE (COTT4 – STAY4) and WRRE (WBUR4 - RATS4) OHL.

4. Details of individual projects

- 4.1 In their May 2026 Load Re-opener Eligibility Letter submissions, NGET and SHET set out their initial plans to deliver the projects outlined below. There were no Eligibility Letter submissions from SPT in this application window.
- 4.2 NGET submitted 24 eligibility applications with a total proposed cost of £5,017.090m.
- 4.3 SHET submitted 4 eligibility applications with a total proposed cost of £1,591.374m.

Assessment Track 2 provisional approvals

NGET submissions

Consultation questions

- EAQ1. Do you agree that these NGET projects are eligible for PCF funding under Part F of Special Condition 3.15?
- EAQ2. Do you agree with our assessment of the needs case for these NGET Assessment Track 2 projects?

Banwen (Rhigos B)

- 4.4 This project is to construct a new 400kV Air-Insulated Switchgear (AIS) double busbar substation for NGED Grid Supply Point (GSP) and Battery Energy Storage System (BESS) customer connection in South Wales. With 393.1MW demand for a new GSP as the primary driver, and 200MW connection for the BESS secondary driver.
- £196.500m project forecast costs
 - £14.692m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
 - Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
 - Proposed Assessment Track by the ETO: Track 2
 - Confirmed Assessment Track by Ofgem: Track 2
- 4.5 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold and is classified as Load Related Expenditure as it is primarily driven by the need for an NGED GSP.

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- 4.6 NGET proposed Assessment Track 2 for the project as it considers its proposed solution, to build a new outdoor double busbar 400kV AIS, to be PASE Primary aligned. We agree that this project is a PASE Primary design. We are also satisfied that an option to extend the existing Rhigos substation is not feasible due to space constraints, and that a new substation build is therefore justified.
- 4.7 As the preferred solution is PASE aligned, we are satisfied with the need and optioneering, and the forecast project costs are <£300m, we propose to accept the needs case and allocate this project to Assessment Track 2.

Berkswell

- 4.8 This project is to deliver a contracted Highspeed Rail 2 (HS2) demand connection by extending the existing 275kV AIS mesh substation at Berkswell. NGET originally submitted this project as part of its RIIO-ET3 business plan, where we approved the need but not NGET's proposed solution, to extend the existing 275kV compound and install three Super Grid Transformers (SGTs) within the extended substation footprint. NGET has since revised its design requirements and preferred solution. The SGT requirement has reduced from three to two, and the preferred solution is now to locate the SGTs in a new remote compound located within the HS2 land boundaries and connected by cabling.
- £76.600m project forecast costs
 - £5.831m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
 - Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
 - Proposed Assessment Track by the ETO: Track 2
 - Confirmed Assessment Track by Ofgem: Track 2
- 4.9 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure, as it is driven by changes in system demand and generation - in this case a new customer connection.
- 4.10 NGET propose that, although non-PASE aligned, Berkswell should be assigned to Assessment Track 2 and proceed directly to PA. We agree with NGET's assessment that the project is non-PASE aligned, as it is an extension to an existing 275kV AIS mesh substation and mesh extensions are not a Primary or Variant intervention within the PASE framework. We also agree with its proposal to assign it to Assessment Track 2 for Early Options Needs Case approval. We believe sufficient justification has been provided to evidence why, although not PASE aligned, the proposal is the best option from a consumer perspective.

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- 4.11 Our assessment at the time of RIIO-ET3 FDs was that NGET needed to provide further detail on alternative options to justify the proposed siting within the existing site boundaries, with related concerns regarding asset health and long-term requirements of the site.
- 4.12 NGET's revised design locates the connecting SGTs in a separate compound, whilst remaining within HS2 land boundaries, which addresses our concerns around future proofing for potential HS2 demand growth. Our concerns remain regarding extending an ageing mesh substation as opposed to rebuilding with a PASE aligned design (eg double busbar). However, NGET have indicated there are no drivers for rebuilding the substation. We do not consider this issue can be resolved whilst delivering the customer connection by the required date, with NGET evidencing site restrictions and land and consenting arrangements established through High Speed Rail (London – West Midlands) Act 2017 that additionally prevent alternative options from being progressed. In future, we expect licensees to consider PASE aligned solutions when engaging with 3rd parties who are obtaining consents on behalf of the licensee. To ensure more streamlined future assessments, we expect licensees to be able to provide evidence that they provided PASE aligned solutions to those obtaining consents on their behalf.
- 4.13 The total project cost of Berkswell has increased since the RIIO-ET3 FDs submission, despite the new SGT need reducing from three to two. At PA we expect to see robust, well-justified cost estimates and detailed delivery plans as per the Load Re-opener Guidance requirements.

Bolney 400kV Site Strategy

- 4.14 An extension of the existing 400kV AIS substation to support contracted customer connections requirements by increasing capacity and operability at a constrained node. This includes c.1.37 GW low carbon transmission customers (1200MW offshore wind and 47.5MW solar), 60MVA of synchronous compensation, specific DNO customers (250MW BESS), and DNO embedded generation and demand.
- £102.600m project forecast costs
 - £7.736m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
 - Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
 - Proposed Assessment Track by the ETO: Track 2
 - Confirmed Assessment Track by Ofgem: Track 2

- 4.15 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure, as it is required to facilitate customer connections and directly supports the Clean Power 2030 (CP2030) and delivery of the UK's net zero targets.
- 4.16 NGET proposed that Bolney 400kV should proceed to Assessment Track 2 as it considers its preferred option, an extension to double busbar AIS, is a PASE variant. This option is preferred over others due to a reduced requirement for new equipment and a lower cost than the other shortlisted options. As the preferred option keeps the existing AIS technology and extends the current substation arrangement, we agree that this is aligned to the PASE variant option "Substation Extension – Atypical Extensions (including Strategic Investment) to Double Bus AIS."
- 4.17 As the preferred solution is PASE Variant aligned, we are satisfied with the need and optioneering, and the forecast project costs are <£300m, we propose to accept the needs case and allocate this project to Assessment Track 2. At PA we expect to see robust, well-justified costs estimates and detailed delivery plans as per the Load Re-opener Guidance requirements.

East Claydon – Enderby – Patford Bridge 1 and 2 OHL

- 4.18 A National Energy System Operator (NESO) driven⁴ overhead line reconductoring project in the South East region to increase boundary capacity across the B8 and B9 boundary by 500MW and 250MW respectively, and increase the thermal capacity on the circuits. The project will also replace and refurbish aging assets to extend the operational life of the circuits, reduce the likelihood of faults and improve reliability.
- £167.800m project forecast costs
 - £12.439m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
 - Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)

⁴ The term 'NESO-driven project' refers to projects driven by recommendations or outcomes from NESO's network planning processes, including the Holistic Network Design and the Network Options Assessment 7 Refresh (2021/22). The NOA process identifies and recommends electricity transmission reinforcement projects for progression where they are needed to meet system requirements and deliver consumer value. These projects typically involve major reinforcements to the electricity transmission network.

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- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 2
- Minded to apply the Major Projects ODI-F

4.19 We have decided that this project is eligible for the Load Re-opener as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and is Load Related Expenditure as it is required to reinforce the network and increase boundary capacity.

4.20 NGET stated that its proposed solution was not PASE aligned, as it has not selected the highest rated conductor. NGET, however, proposed that East Claydon – Enderby – Patford Bridge should proceed through Assessment Track 2.

4.21 We have decided that the evidence provided is sufficient to explain why NGET considers its conductor selection (which is non-PASE) offers long-term consumer benefits, particularly in terms of lower capital cost compared to the higher rated PASE-aligned option, reduced delivery risk, NGET being more familiar with the operational needs of this conductor, and avoidance of repeat works.

4.22 We therefore propose to approve the needs case and assign this project to Assessment Track 2, with the next Assessment Stage being PA.

4.23 As this project is designated as critical for delivering CP2030 and will deliver material consumer benefit we are minded to apply the Major Projects ODI-F. More information can be found in the Major Projects ODI-F annex.

Feckenham – Hams Hall OHL

4.24 A NESO driven overhead line reconductoring project in the Midlands region to address thermal limitations of the existing circuit by increasing the B8 boundary capability and the B9 boundary capability by 1050MW and 950MW respectively. The project is identified in the transitional Centralised Strategic Network Plan 2 (tCSNP2) as supporting the CP2030 pathway. The project will also replace and refurbish aging assets to extend the operational life of the circuits, reduce the likelihood of faults and improve reliability.

- £54.300m project forecast costs
- £3.985m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 2
- Minded to apply the Major Projects ODI-F

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- 4.25 We have decided that this project is eligible for the Load Re-opener as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure, required to reinforce the network and increase boundary capacity.
- 4.26 In its submission, NGET highlighted other overhead line (OHL) project interactions at Hams Hall 400kV substation, namely the reconductoring of Drakelow – Hams Hall (ZF) route. It clarified that Drakelow- Hams Hall reinforcement has been removed from its Load Re-opener submission as initial indications are that reinforcement on Drakelow- Hams Hall is not required before 2030. For the avoidance of doubt, and in light of the above, our assessment relates to the Feckenham–Hams Hall 400kV OHL project only.
- 4.27 NGET stated that its proposed solution was not PASE aligned, as it had not selected the highest rated conductor. NGET proposed that Feckenham – Hams Hall OHL should proceed through Assessment Track 2.
- 4.28 We consider that the evidence provided is sufficient to explain why NGET considers its conductor selection (which is non-PASE) offers long-term consumer benefits, particularly in terms of lower upfront cost than the PASE-aligned option, reduced delivery risk, NGET being more familiar with the operational needs of this conductor, and avoidance of repeat works. We, therefore, propose to approve the needs case and assign this project to Assessment Track 2, with the next Assessment Stage being PA.
- 4.29 As this project delivers a strategically important capacity uplift to the B8 and B9 boundaries, which aligns with CP2030, and will deliver material consumer benefit, we are minded-to apply the Major Projects ODI-F. More information can be found in the Major Projects ODI-F annex.

Feckenham – Ironbridge OHL

- 4.30 A NESO driven overhead line reconductoring project to address thermal limitations of the existing circuit by increasing SC1Rev boundary capacity by approximately 700MW. The project will also replace and refurbish aging assets to extend the operational life of the circuits, reduce the likelihood of faults and improve reliability.
- £79.700m project forecast costs
 - £5.908m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
 - Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
 - Proposed Assessment Track by the ETO: Track 2

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- Confirmed Assessment Track by Ofgem: Track 2
- Minded to apply the Major Projects ODI-F

- 4.31 We have decided that this project is eligible for the Load Re-opener as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure, required to reinforce the network and increase boundary capacity.
- 4.32 NGET stated that its proposed solution was not PASE aligned, as it had not selected the highest rated conductor. NGET proposed that Feckenham – Ironbridge OHL should proceed through Assessment Track 2.
- 4.33 We consider that the evidence provided is sufficient to explain why NGET considers its conductor selection (which is non-PASE) offers long-term consumer benefits, particularly in terms of lower upfront cost than the PASE-aligned option, reduced delivery risk, NGET being more familiar with the operational needs of this conductor, and avoidance of repeat works. We, therefore, propose to approve the needs case and assign this project to Assessment Track 2, with the next Assessment Stage being PA.
- 4.34 As this project has been signalled as essential by NESO as part of the Holistic Network Design, and will deliver material consumer benefit, we are minded to apply the Major Projects ODI-F. More information can be found in the Major Projects ODI-F annex.

Imperial Park 400/132kV Upgrade

- 4.35 An upgrade of the existing Imperial Park substation in south Wales by upgrading the existing 400/33kV SGTs to 400/132kV and associated works to deliver additional capacity to enable contracted downstream demand (including embedded data centre demand).
- £60.450m project forecast costs
 - £4.632m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
 - Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
 - Proposed Assessment Track by the ETO: Track 2
 - Confirmed Assessment Track by Ofgem: Track 2
- 4.36 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classified as Load Related Expenditure as it forms part of the wider

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infrastructure required to support increasing data centre demand and the UK's broader digital and economic growth ambitions.

- 4.37 NGET stated that Imperial Park is non-PASE aligned, as it is an extension of a single switch mesh substation which is not a PASE Primary or PASE Variant intervention within the PASE framework. We agree with NGET's assessment that the project is non-PASE aligned.
- 4.38 NGET proposed Assessment Track 2 for this project, with the next Assessment Stage being PA.
- 4.39 The preferred solution has been selected after NGET considered PASE-aligned new-build substation comparators, including new 400/132kV Air-Insulated Switchgear (AIS) and Gas-Insulated Switchgear (GIS) options. Those options were not taken forward as the preferred solution because of land, environmental, flood risk, access, consenting and programme constraints. Although the preferred option is not PASE aligned, NGET has provided a proportionate justification for using this design. The preferred option is materially cheaper than the new-build GIS option, has the highest net present value (NPV) among the shortlisted options, uses the existing site, avoids new land take, and supports earlier connection than a new substation. However, the option does not provide material future expansion beyond the immediate need and provides non-firm rather than firm capacity.
- 4.40 Therefore, as we consider the needs case to be justified, and the forecast project costs are <£300m, we propose to accept the needs case and allocate this project to Assessment Track 2.
- 4.41 At the PA stage, we require NGET to provide, as a minimum:
- Clarification on the discrepancy between the 242MW demand stated in the Needs Case and the 282MW demand stated in the Investment Summary.

Ince SGT Extension

- 4.42 Reinforcement to enable a contracted strategic demand connection at a DNO substation and to restore SQSS-compliance, requiring installation of a new 400/132kV, 240MVA SGT with new 400kV connection.
- £61.520m project forecast costs
 - £4.597m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and $PCFRE_t$)
 - Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
 - Proposed Assessment Track by the ETO: Track 2
 - Confirmed Assessment Track by Ofgem: Track 2

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- 4.43 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure, as it is driven by contracted strategic demand and increases capacity resilience at Ince.
- 4.44 NGET proposed that the Ince SGT Extension should proceed through Assessment Track 2. This is primarily because their preferred solution comprises a PASE Variant option due to the new circuit consisting of both overhead line and cable, and substation extensions with both AIS and GIS technology. We agree with the reasoning of preferred option being PASE variant due to site-specific constraints. We are satisfied with the needs case being evidenced in the submission, and the forecast project costs are <£300m, and therefore propose to accept the needs case and allocate this project to Assessment Track 2.

Keadby 132kV

- 4.45 A cable replacement project to maintain the transmission–distribution interface between Keadby 400kV substation and the Distribution Network Operator (DNO), Northern Powergrid’s (NPg) rebuilt 132 kV GIS substation. The cable replacement will increase capacity so that NPg can connect around 540MW of additional embedded generation, and will involve replacing existing TO–DNO cables with new higher capacity Cross-Linked Polyethylene (XLPE) cables.
- £53.690m project forecast costs
 - £4.088m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
 - Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
 - Proposed Assessment Track by the ETO: Track 2
 - Confirmed Assessment Track by Ofgem: Track 2
- 4.46 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure because the driver is a cable replacement to facilitate the DNO customer connection and enable 540MW additional embedded generation at Keadby.
- 4.47 NGET proposed that Keadby 132kV should proceed through Assessment Track 2, as the project is PASE variant and the asset is fully funded by the customer. We agree with this reasoning as the proposal most aligns with the PASE variant option for a new cable circuit “cable route stand alone” and is funded by the customer, and therefore we allocated the project to Assessment Track 2. The reason for this is that the cable route constitutes a new circuit between the 400 kV NGET

substation and the newly built 132kV NPg substation. The existing cables are not being replaced in-situ which means the new cables are not going in the same route as previously.

Kingsnorth 400kV Extension

4.48 This project is driven by a contracted demand connection for a 300MW data centre customer, located in proximity to Kingsnorth substation.

- £96.700m project forecast costs
- £7.291m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 2

4.49 We have decided that this project is eligible for the Load Re-opener as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure required to facilitate customer connection to the network.

4.50 NGET's proposed solution is to extend the existing Kingsnorth 400kV indoor double busbar AIS substation in the location of a spare AIS bay, and an extension of the GIS substation with one new SF6-free GIS bay, both feeding a new transformer compound. NGET also proposed that Kingsnorth 400kV should proceed to Assessment Track 2, as the project is PASE variant and most costs are to be borne by the customer.

4.51 Under PASE, the proposed works are most closely aligned with a Variant Option for a substation extension, specifically an atypical extension to a double busbar AIS substation. However, NGET's proposed solution is not limited to an AIS extension, as it also includes a GIS extension. The inclusion of GIS works means the preferred option does not align with the PASE framework.

4.52 Through our review, we consider that NGET has provided sufficient justification for the selection of its preferred option as the customer requested additional resilience which resulted in a new bay being required on either side of the bus section, therefore one AIS and one GIS. Additional resilience is customer funded. We therefore propose to approve the needs case and assign this project to Assessment Track 2, with the next Assessment Stage being PA.

SCORE (COTT4 – STAY4) and WRRE (WBUR4 – RATS4) OHL

4.53 'SCORE' and 'WRRE' are NESO references to specific schemes:

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- SCRE – Upgrading existing 400kV Cottam to Staythorpe 1 (A408) single circuit.
- WRRE – Upgrading existing 400kV West Burton to High Marnham (A403), High Marnham to Stoke Bardolph (A41E) and Ratcliffe-on Soar to Stoke Bardolph (A41F) single circuits.

4.54 A CP2030-driven upgrading of existing 400kV overhead lines in Nottinghamshire, to remove reliance on non-type registered conductors and deliver required winter post-fault ratings. The SCRE and WRRE schemes are also counted as ‘non-attributable’ enabling works for a number of customer offers. The project is also a critical enabler for the ASTI Brinsworth to High Marnham project (NESO reference: EDEU).

- £157.800m project forecast costs
- £12.039m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 2
- Minded to apply the Major Projects ODI-F

4.55 We have decided that this project is eligible for the Load Re-opener as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classified as Load Related Expenditure as it is needed to upgrade the network.

4.56 NGET stated that its proposed solution is not PASE aligned as it had not selected the highest rated conductor. NGET proposed that SCRE and WRRE should proceed through Assessment Track 2.

4.57 We have decided that the evidence provided is sufficient to explain why NGET considers its conductor selection (which is non-PASE) to be in the best interests of consumers. The higher-rated conductor, which would align with PASE, was not selected because it has limited existing use on the network, is available from only one supplier, and could lead to longer lead times, higher transmission losses and higher costs compared with NGET’s preferred option.

4.58 We therefore propose to approve the needs case and assign this project to Assessment Track 2, with the next Assessment Stage being PA.

4.59 As this project is CP2030 driven, and is a critical enabler for an ASTI project, we are minded-to apply the Major Projects ODI-F. More information can be found in the Major Projects ODI-F annex.

Willington 132kV Rebuild – Connection Assets

4.60 The transfer and reconnection of NGET SGT circuits into the new NGED Willington 132kV substation to address fault-level and capacity constraints.

- £43.200m project forecast costs
- £3.250m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 2

4.61 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure, as it is driven by the NGED connection assets project. NGET's Willington connection assets enable NGED's rebuild to address capacity constraints and supports efficient provision for future network growth. NGET's preferred option is PASE Variant.

4.62 NGET proposed that Willington 132kV should proceed through Assessment Track 2, as the proposed solution is assessed as a PASE Variant Option as the technical scope is a new cable route and the assets are being paid for by the connecting customer. We agree with this reasoning and have decided to allocate the project to Assessment Track 2 as the needs case is sufficiently evidenced in the submission and the project cost is £43.2m and therefore below £300m.

SHET submissions

Consultation questions

- EAQ3. Do you agree that these SHET projects are eligible for PCF funding under Part F of Special Condition 3.15?
- EAQ4. Do you agree with our assessment of the needs case for these SHET Assessment Track 2 projects?

Energy Isles (Kergord) Windfarm Connection

4.63 Connection of a 120.3MW onshore windfarm on the island of Yell via the installation of one 132kV feeder bay at the new 220/132kV Yell substation. The project includes 21.1km single circuit made up of 18.6km of overhead line and 2.5km of underground cable (UGC). Yell substation is being delivered under the Shetland on Island Infrastructure project.

- £52.369m project forecast costs

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- £3.967m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 2

4.64 We have decided that this project is eligible for the Load Re-opener as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure as it is needed to connect a contracted customer.

4.65 SHET stated that its proposed solution was a PASE Variant option. SHET provides proportionate justification for the 132kV pole route and the hybrid overhead line and cable solution, including the customer's non-firm connection requirement, lack of direct boundary circuit interaction, turbine proximity at the circuit ends, the extent of peatland on Yell, and the higher cost and greater construction and consenting challenges of a full underground cable solution. We therefore agree that the proposed solution meets the requirements for PASE Variant.

4.66 SHET proposed that Energy Isles should proceed through Assessment Track 2. As the preferred solution is PASE Variant aligned and we are satisfied with the need and optioneering, and the forecast project costs are <£300m, we propose to accept the needs case and allocate this project to Assessment Track 2.

4.67 At the PA stage, we require SHET to provide, as a minimum:

- More information on the interactions between the Yell substation build (delivered under the Shetland On-Island Infrastructure project), and the additional bay delivered under this project.

Knocknagael Farigaig HVP

4.68 High voltage reinforcement at Knocknagael 275kV substation in the Inverness area to address steady-state voltage and system operability requirements. The needs case was determined to be justified at RIIO-T3 FDs as works are required for compliance. The solution involves extension at the Knocknagael site and installation of a static synchronous compensator (STATCOM) at a satellite location.

- £215.392m project forecast costs
- £15.955m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)

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- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 2

4.69 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and is classified as Load Related Expenditure as it provides essential reinforcement.

4.70 SHET noted that its preferred solution, to locate the STATCOM at a satellite site, is not a PASE aligned option. The extension of the substation to accommodate the bay to connect the STATCOM is an AIS double busbar extension which is PASE aligned. However, we determine that the preferred option overall is not PASE aligned.

4.71 SHET proposed that Knocknagael should proceed through Assessment Track 2. SHET provided justification on the selection of a satellite option compared to a full extension of the existing double busbar substation to accommodate the STATCOM. Constraints associated with an extension to also include the STATCOM were discounted due to the volume of earthworks required, interactions with existing underground cables and overhead lines, environmental impacts, and risk of interaction with the ongoing planning application for the Knocknagael extension driven by the Loch Na Cathrach customer. Given the information provided, and that the forecast costs are <£300m, we propose to accept the needs case and allocate this project to Assessment Track 2. However, more information is required at the next Assessment Stage.

4.72 At the PA stage, we require SHET to provide, as a minimum:

- Optioneering of the satellite site siting and 275kV cable route, and selection of the preferred option;
- Optioneering of satellite site layout, and development of the preferred option; and
- Costings for extensions and new infrastructure.

Loch Na Cathrach Cluster

4.73 Connection of a 500MW pumped-storage hydro scheme to Knocknagael 275kV substation in the Inverness area. The solution involves extension of the existing substation to create one new 275kV AIS bay and 7.5km UGC. The UGC cost is being covered by the customer as part of the one-off works costs.

- £162.618m project forecast costs

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- £12.956m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and $PCFRE_t$)
 - Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
 - Proposed Assessment Track by the ETO: Track 2
 - Confirmed Assessment Track by Ofgem: Track 2
- 4.74 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and is classified as Load Related Expenditure as it is necessary for a contracted customer connection.
- 4.75 SHET stated the substation element was PASE Variant aligned, as the project extends an existing AIS double busbar substation, and the sole-use UGC is also PASE Variant because the customer will fund the difference between the cable solution and an overhead line solution. Based on the details provided within the submission we determine that the two elements of the project are PASE Variant options.
- 4.76 SHET proposed that Loch Na Cathrach should proceed through Assessment Track 2. As the preferred solution is a PASE Variant option, we are satisfied with the need and the project costs are <£300m, we propose to accept the needs case and allocate this project to Assessment Track 2.
- 4.77 This project is connecting into Knocknagael 275kV substation, which is the subject of another Eligibility Letter submitted by SHET. Within the optioneering provided for the Loch Na Cathrach connection, two options were developed for an extension at Knocknagael and the selected option will have interactions with the Knocknagael STATCOM submission. We require further clarifications around the cost interactions between the Loch Na Cathrach connection and the other works proposed for Knocknagael 275kV substation, which should be addressed by SHET in the next Assessment Stage.
- 4.78 At the PA stage, we require SHET to provide, as a minimum:
- more information in the interactive costs between the Loch Na Cathrach project and the Knocknagael STATCOM project. For instance, if SHET is planning to use the same contractor for both schemes, how are the costs being proportioned? Or if the civil extension of the substation is being completed in one physical construction work effort, how are the costs for this work being separated between the schemes; and
 - detailed delivery plans also outlining the project interactions.

Assessment Track 3 approvals

NGET submissions

Consultation questions

EAQ5. Do you agree that these NGET projects are eligible for PCF funding under Part F of Special Condition 3.15?

Aberthaw – Site Strategy

4.79 This project is to construct a new 275/132kV double busbar indoor GIS substation at the existing Aberthaw site to enable near-term, contracted customer connections on the network at a critical supply point. With 480MVA demand from two demand customers (data centres), one 249MW photovoltaic (PV) connection and National Grid Electricity Distribution (NGED) growth as the primary investment drivers. Asset health interventions including decommissioning of a legacy asset is considered as a secondary investment driver.

- £530.300m project forecast costs
- £40.219m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 3

4.80 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure, as it is principally driven by changes in system demand and generation (ie contracted customer connections), supports development within a government-designated AI Growth Zone, and enables significant investment in the region.

4.81 NGET proposed that Aberthaw Site Strategy should proceed through Assessment Track 2. We disagree and have decided that this project should be assigned to Assessment Track 3 and proceed to standalone NCA for additional scrutiny. This is because the project forecast costs exceed the £300m materiality threshold under the Load Re-opener Guidance for Assessment Track 2 projects.

4.82 In its submission, NGET acknowledged that the PASE guidance does not include 275kV infrastructure as a PASE aligned option. It argued that the preferred solution would align with a future PASE variant, if the framework were expanded to include 275kV, citing coastal location for informing its choice of indoor GIS.

However, proximity to the coast alone is not sufficient justification for the selection of a PASE Variant GIS option. While it provides some design justification, it does not make the project PASE aligned under the current framework because the transmission design voltage remains outside the stated PASE categories.

4.83 NGET highlighted uncertainty around the strategic importance of the generation and demand connection customers and has indicated that optioneering may need to be revisited following the outcome of Connections Reform.⁵ It has also noted uncertainty surrounding the South Wales Regional Strategy.⁶ While there is currently no identified driver to uprate the network to 400kV, should the chosen approach of 275kV subsequently prove to be sub-optimal, future assessments may take account of the information provided as part of this submission.

4.84 At the NCA stage, we require NGET to provide, as a minimum:

- explanation of how the proposed solution provides sufficient flexibility for future supply and demand scenarios.
- detailed CBA for the options;
- detailed cost build-up of the proposed solution;
- final programme assumptions; and
- an update on customer status following Connections Reform.

Blyth 400kV Site Strategy

4.85 A reinforcement at Blyth 400kV substation in the North East of England to enable multiple large demand and generation connections, totalling 1.1 GW and 1.4 GW respectively. Works involve a temporary AIS extension of the existing substation to enable a quicker connection of the customer, followed by a new SF6-free GIS substation.

- £400.900m project forecast costs
- £29.733m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)

⁵ Demand Connections Reform is a coordinated, multi-year regulatory programme led by Ofgem, working with the UK Government, NESO and network companies. Its objective is to reform the demand connections process so that viable projects can secure timely connections and strategic projects can be prioritised. This will deliver benefits for consumers, support economic growth while maintaining system security and operational integrity.

⁶ South Wales Regional strategy paper: As part of its Load Re-opener submission for the Abethaw – Site Strategy, NGET provided documentation to update on its South Wales regional transmission strategy, including the case for progressing near-term 275kV investments while preserving flexibility for future network evolution. The paper sets out the analysis, options and discussion points for Ofgem consideration, particularly on whether and when a potential 400kV uprating could become justified.

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- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 3
- Minded to apply the Major Projects ODI-F

4.86 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure as it is a reinforcement to allow for connection of demand and generation customers.

4.87 NGET proposed that Blyth 400kV should proceed through Assessment Track 2. However, we have decided to allocate it to Assessment Track 3. This is primarily due to the high materiality of the project. The project exceeds the materiality threshold for Assessment Track 2 projects (>£300m) and therefore requires a standalone NCA to allow us to further scrutinise the options presented.

4.88 In its submission, NGET have indicated the preferred solution is a PASE Variant option due to its proximity to coast. We agree the preferred option is a PASE variant, however, proximity to coast alone is not sufficient justification for the selection of a PASE Variant GIS option. Further work is required on the siting and development of the temporary AIS substation. Additionally, there is uncertainty on the required diversion of the North Sea Link interconnector to accommodate the new GIS substation and whether it would connect to the new substation.

4.89 NGET also note that the existing 400kV GIS substation has advanced signs of corrosion due to its proximity to the coast and therefore could be decommissioned if the North Sea Link cables were terminated into the new GIS substation. Concerns remain on the early asset write-off of this substation.

4.90 At the NCA stage, we require NGET to provide, as a minimum:

- clarity on the siting and development of the temporary AIS substation;
- agreements on the diversion of the North Sea Link cable and proposed designs to accommodate this; and
- details on the degradation of the existing substations and how this would be mitigated on the new substation.

4.91 Blyth is a strategically important project which facilitates the connection of CP2030 critical generation projects and supports a nationally significant investment in digital infrastructure within the government designated AI Growth Zone. Therefore, we are minded-to apply the Major Projects ODI-F. More information can be found in the Major Projects ODI-F annex.

Bodelwyddan 400kV Extension

4.92 An extension of the existing 400kV Bodelwyddan substation in North Wales to facilitate a large package of offshore wind, interconnector, solar and Battery Energy Storage System (BESS) connections. NGET's preferred solution is an offline build (SF6-free) GIS hall adjacent to and connected to the existing substation, with modification of the OHL connections to create a double turn-in of the existing 4ZB route.

- £194.700m project forecast costs
- £14.717m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 3
- Minded to apply the Major Projects ODI-F

4.93 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure, as it is required to facilitate customer connections and directly supports CP2030 objectives and delivery of the UK's net zero targets.

4.94 Although we propose to approve project eligibility, we do not agree with NGET's proposed Assessment Track 2 classification. NGET submitted the project on the basis that the preferred solution is a PASE Variant and therefore suitable for Assessment Track 2. Specifically, NGET considered the preferred option to be an SF6-free extension of an existing double-busbar substation.

4.95 We consider this to be a misinterpretation of the PASE category as the relevant PASE category relates to the extension of an existing SF6-free substation using additional SF6-free equipment. However, the proposed investment involves the extension of an existing SF6 GIS installation using new SF6-free technology. This differs materially from the relevant PASE category and therefore falls outside the scope of the pre-approved engineering solutions envisaged under the PASE framework. We will continue working with stakeholders to improve clarity on the intent of our PASE framework as it becomes more embedded.

4.96 At the NCA stage, we require NGET to provide, as a minimum:

- further evidence on land constraints that led to the selection of GIS over AIS;

- further justification demonstrating that sufficient space would remain to accommodate a future rebuild of the existing substation, given the proximity of the proposed new substation.

4.97 As Bodelwyddan is a strategically important project and facilitates the connection of CP2030 critical generation projects, we are minded to apply the Major Projects ODI-F. More information can be found in the Major Projects ODI-F annex.

Bridgend

4.98 A new 400kV transmission connection node in South Wales to accommodate up to 860MW of contracted demand customer (data centre) and to provide capability for anticipated further generation needs, including expected offshore wind generation.

- £319.500m project forecast costs
- £23.946m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 3
- Confirmed Assessment Track by Ofgem: Track 3
- Minded to apply the Major Projects ODI-F

4.99 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure as it is driven by contracted demand, future generation requirements, wider network development requirements, and the need to establish an enduring transmission solution for the South Wales West region.

4.100 NGET proposed that Bridgend 400kV development should proceed through Assessment Track 3. This is primarily because the optioneering is currently ongoing, with no preferred option currently identified. We agree with this reasoning and have decided it will be allocated to Assessment Track 3 and proceed to standalone NCA stage.

4.101 At the NCA stage, we expect NGET to provide, as a minimum:

- the comparative assessment of the AIS and GIS solutions, including comprehensive Cost Benefit Analysis;
- detailed evidence supporting the generation driver including the underlying system studies and planning evidence; and

- updated delivery and programme evidence, including confirmation of access arrangements and environmental constraints.

4.102 As Bridgend is a strategically important project and aligns with government priorities on growth and net zero, we are minded to apply the Major Projects ODI-F. More information can be found in the Major Projects ODI-F annex.

Farmoor

4.103 A new 400kV substation to enable three contracted connections (one solar and two combined solar and BESS) totalling 2,120MW. The preferred solution is a new 11-bay SF6-free 400kV GIS substation south of the Farmoor Reservoir, selected for a smaller footprint compared to AIS options due to the project's proposed location in the Oxfordshire Green Belt⁷ and other land constraints related to the site.

- £136.200m project forecast costs
- £10.164m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 3

4.104 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and is classified as Load Related Expenditure, as it is driven by changes in system demand and generation (in this case contracted generation connections).

4.105 NGET proposed that Farmoor should be assessed under Assessment Track 2. NGET's preferred option is a new 11-bay SF6-free 400kV GIS substation, with allowance for six additional bays. It considers a new substation is required because existing substations are physically constrained and cannot accommodate the contracted connections. The evidence supports the need for new infrastructure; however, we disagree with NGET's proposed Assessment Track and have decided that Farmoor should be assigned to Assessment Track 3 for a subsequent NCA.

⁷ Green Belts are areas of land subject to strict controls on development. As outlined in [National Planning Policy Framework 4 \(NPF4\)](#), "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

- 4.106 A key concern is that NGET has not yet fully evidenced why the preferred site inside the Green Belt was selected over options outside the Green Belt. The preferred site has significant land and planning challenges that mean a non-PASE aligned GIS design is preferred by NGET due to reduced footprint. Sites outside of the Green Belt would likely mitigate the planning challenges and mean AIS design options are more viable. NGET explains that the distance required to connect the new substation to existing infrastructure would be greater for non-Green Belt options, however, it is not fully evidenced that these options would be against consumer interests (eg costs and timeline impacts).
- 4.107 Another concern is tied to a driver for this project being the connection of two combined solar and BESS customers. In light of the issues in relation to the oversupply of battery storage projects in the connection queue (highlighted in the joint [open letter from DESNZ and Ofgem on connections reform delivery](#) and discussed further in paragraphs 4.169-4.172), we need to be sure that NGET's preferred option is the best one from a consumer perspective. This means ensuring that it is the best option to allow NGET to fulfil its customer connection obligations, whilst minimising the risk to energy consumers of paying for work that might not be needed should any of the connecting customers leave the connections queue. In response to our engagement on this issue, NGET addressed some scenarios in which the BESS elements do not connect. However, the connections at Farmoor are for joint solar and BESS projects, and it remains uncertain how changes to BESS needs may impact the associated solar connections.
- 4.108 At the NCA stage, we require NGET to provide, as a minimum:
- more detailed justification of why non-Green Belt AIS options were not further developed, as opposed to the Green Belt GIS/AIS options;
 - CBA of non-Green Belt AIS options in comparison to the considered Green Belt options;
 - evidence that provides confidence that planning consent challenges will be successfully managed by NGET so as to avoid risking customer connection delivery requirements, as part of a more detailed risk and mitigation submission;
 - evidence that supports claims that PASE-aligned AIS options in the Green Belt would face materially greater planning challenges compared to GIS;
 - detailed scenario planning regarding how BESS-related customer connections may be impacted by changes to the connection queue; and
 - confirmation regarding the Gate maturity of customer connections, with some contradiction regarding one customer between the original application and subsequent engagement with NGET.

Laleham 132kV Extension

4.109 Extension of Laleham substation in West London, which has existing GIS and AIS components, with a new 132kV SF6-free GIS hall. This is to facilitate connection of five contracted data centre demand customers totalling 393MVA as well as 290MW of BESS. There is a secondary driver of system compliance, as NGET states that contracted demand at Laleham exceeds the capability of the existing SGT arrangement and that investment is required to maintain compliance with Chapter 3 of the Security and Quality of Supply Standards (SQSS), resolving pre- and post-fault overloads on the SGTs.

- £217.400m project forecast costs
- £16.392m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and $PCFRE_t$)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 3

4.110 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure as it is needed to connect five contracted customers.

4.111 NGET stated that its proposed solution was PASE Variant as an atypical SF6-free GIS double busbar substation extension. However, NGET's view is due to a misinterpretation of the PASE guidance that designates 'extensions to SF6 free GIS Double Bus Bar Substations' as PASE Variant. To be PASE Variant, both the existing substation and the extension must be SF6-free GIS. An SF6-free extension to an existing SF6 GIS substation, as in this case, does not meet the requirement for PASE Variant. Therefore, the proposed solution is not PASE aligned.

4.112 We also have some concerns regarding the futureproofing of the Laleham site, given a strong likelihood that the network in west London will require uprating to 400kV in the future to cater for increasing demand. The Laleham substation will be central in any potential future strategic uprating of the West London 275kV network to 400kV.

4.113 NGET has recognised this but argues that the Laleham project needs to go ahead as planned as a near term solution to connect the contracted customers. We are concerned that if Laleham needs to be uprated to 400kV in the future, any investment that does not cater for this will be written off at significant cost to consumers.

4.114 NGET proposed that Laleham 132kV Site Strategy should proceed through Assessment Track 2. However, we have decided that it should be assigned to Assessment Track 3. This is due to the fact that the proposed solution does not align with PASE, and that there is a need to further test the justification for this option.

4.115 At the NCA stage, we require NGET to provide, as a minimum:

- detailed CBA for the options;
- detailed cost build-up of the proposed solution;
- final programme assumptions;
- consideration of the interface with potential future needs to uprate the network in west London to 400kV, including the potential for a rebuild of the new substation; and
- an update on customer status following Connections Reform.

Lower Frankton 400kV AIS Substation

4.116 The Lower Frankton project involves the construction of a new 400kV AIS substation in Shropshire to provide an enduring transmission connection for a 132kV Independent Distribution Network Operator (IDNO) substation and its associated onshore wind generation portfolio, representing approximately 943MW of Transmission Entry Capacity.

- £347.700m project forecast costs
- £25.694m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and $PCFRE_t$)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 3
- Confirmed Assessment Track by Ofgem: Track 3

4.117 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure as NGET has demonstrated that the investment is driven by a contracted customer connection requirement and provides a clear network need.

4.118 NGET's provisional preferred option is for a new 24 bay 400kV AIS substation because it seeks to accommodate both current and future system requirements through a single intervention, consistent with a "build once" strategy. However, NGET has not yet formally confirmed the selection of a preferred option. NGET considers the provisional preferred option to be PASE Primary aligned. We agree

that the provisional preferred option project is a PASE Primary design, and we are satisfied with the need and optioneering of technology choice for this option.

4.119 As the project has forecast total cost of greater than £300m, it must proceed through Assessment Track 3, as proposed by NGET.

4.120 At the NCA stage, we require NGET to provide, as a minimum:

- confirmation of the preferred option;
- comparison of siting options and the preferred site;
- further evidence on the scale of proposed investment across a range of future demand and generation scenarios;
- updated evidence on confirmed customer status, outcome of siting reassessment, and available for commercial load (ACL) dates following connections reform; and
- confirmation of whether the wider strategic drivers remain in scope; and
- Quad Booster (QB) scope, and the value-for-money case for the larger 24-bay solution.

North West London

4.121 A multi-technology reinforcement package to increase capacity along the North West London (NWL) network by delivering two schemes: ESC1 (install a second 400kV circuit between Elstree and St John's Wood) and SER4 (reconductoring Sundon–Elstree route). Both schemes are NESO driven investments that are critical for increasing import capability into London and to reduce constraint costs.

- £400.500m project forecast costs
- £29.995m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 3
- Minded to apply the Major Projects ODI-F

4.122 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. This project is above the £40m materiality threshold, and classifies as a Load Related Expenditure required to reinforce the network, increase boundary capacity, reducing constraints across LE1 and B14 and supports CP2030 objectives.

4.123 NGET proposed that the North West London project should proceed through Assessment Track 2. We disagree and have decided that this project should be assigned to Assessment Track 3 and proceed to standalone NCA stage for additional scrutiny. This is because the project forecast costs exceed the £300m materiality threshold under the Load Re-opener Guidance for Assessment Track 2 projects.

4.124 NGET's proposed solution combines three elements:

- For ESC1, NGET proposes reusing the existing Elstree–St John's Wood tunnel to install a second 400kV cable. This avoids a new surface route, tunnel or overhead line infrastructure. We therefore consider the cable element to be best characterised as a Variant PASE cable option.
- For SER4, the preferred option is to reconductor the existing Sundon to Elstree overhead line route using a GAP conductor.
- For the Elstree and St John's Wood connection (ie substation elements), NGET proposes an SF6-free GIS extension at Elstree and modification of the existing GIS arrangement at St John's Wood. These options do not directly align with a PASE Primary Option, however NGET has provided supporting rationale, including site constraints, limited space, planning considerations and reduced disruption compared with alternative options.

4.125 Overall, we consider the project is PASE-variant aligned, comprising a Primary Option element for SER4 and Variant Option elements for the cable and substation works.

4.126 In its submission, NGET notes that the proposed technology choice for the NWL project has significant dependencies on, and interactions with, another related project in its portfolio: the Letchmore Heath project. NGET submitted the Letchmore Heath project for Final Needs Case assessment in January 2026 under the RIIO-T2 Large Onshore Transmission Investment mechanism. NGET has indicated that it is likely to request allowances for the NWL project at PA stage through a combined submission with Letchmore Heath, as both projects are expected to be delivered jointly as a single programme. Considering this, we propose that NGET combine both projects as one standalone NCA submission under the Load Re-opener. This approach would support a smoother alignment in the application process.

4.127 At the NCA stage, we require NGET to provide, as a minimum:

- greater specificity regarding the interactions with ASTI schemes (ie North London Reinforcement (HWUP) project) and other regional London projects. This must include details on how each project interacts to deliver the various project drivers, how the varied maturity of project drivers (eg what is contractually fixed or is dependent on other projects) interaction and how delay across different projects may impact delivery;
- the consequences of delay, including critical path and sequencing impacts, risk to Q4 2030/31 delivery and potential exposure to the reported £300m to £800m annual constraint costs from 2030; and
- impacts on third parties (UKPN) interfaces and if there are opportunities for the potential of holistic site interventions.

4.128 As the North West London project is a strategically important project, we are minded-to apply the Major Projects ODI-F. More information can be found in the Major Projects ODI-F annex.

Tees Dock Substation

4.129 The project is to deliver a new 400kV node at Tees Dock, Teesside (“Tees Dock Substation”) to support major new demand and generation connections. The primary customer is an AI data centre with a contracted demand of 1,400MW, and a 1,000MW Battery Energy Storage System (BESS).

- £657.500m project forecast costs.
- £49.081m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 3
- Minded to apply the Major Projects ODI-F

4.130 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and is classified as Load Related Expenditure as the project demonstrates clear consumer and system value through facilitating significant contracted demand and enabling timely connections aligned to contractual commitments.

4.131 NGET proposed that Tees Dock should proceed through Assessment Track 2 on the basis that the preferred option is considered a PASE variant, stating that it is an indoor double bus GIS substation at 400kV in proximity to the coast.

- 4.132 We have decided that it should be assigned to Assessment Track 3. The preferred solution represents a major strategic investment with forecast costs of approximately £657.5m. This exceeds the £300m maximum value permitted under the Load Re-opener Guidance for Assessment Track 2 projects.
- 4.133 Proximity to coast alone is not sufficient justification for the selection of a PASE Variant GIS option. Additionally, further work is required on system design, routing and consenting for Phase 2 after Connections Reform outcomes are clearer. There are also questions that need to be answered relating to risks around land acquisition, brownfield remediation, equipment lead-times, resource availability, outage availability and delivery of the compressed programme.
- 4.134 Given the scale, complexity and materiality of the project, we consider that a more detailed review of the preferred option is required before any PA funding decision can be made.
- 4.135 At the NCA stage, we require NGET to provide, as a minimum:
- an update on customer requirements following connections reform, including confirmation of connection dates, capacity requirements and any impacts on the scope for phases 1 and 2;
 - a more mature design for phase 2 including the system design, circuit routing and consenting work; and
 - up-to-date details on land acquisition, remediation requirements and programme delivery risks including evidence of how land and site-related risks are being managed and mitigated.
- 4.136 As Tees Dock is a strategically important project, we are minded to apply the Major Projects ODI-F. More information can be found in the Major Projects ODI-F annex.

Tilbury 275kV Rebuild – RIIO T3 Holistic Site Strategy

- 4.137 The project has multiple drivers, including new customer connections, NESO identified network operability and LE1 boundary uplift requirements, and significant asset health issues. Specific connection needs include a 215MW data centre demand connection, a 200MVA voltage control connection, and feeder circuit reconfiguration of the Warley circuit bays to support new connections at Warley substation. NGET has not yet settled on its preferred design option. Options currently under consideration include construction of a new substation offsite to reconfiguration of the existing 275kV AIS substation to 400kV.
- £231.770m project forecast costs.

Consultation: RIIO-ET3 Load Re-opener May 2026 Draft Determinations: Eligibility Assessment annex

- £17.472m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 3
- Confirmed Assessment Track by Ofgem: Track 3
- Minded to apply the Major Projects ODI-F

4.138 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold (with this true of all shortlisted options), and classifies as Load Related Expenditure, as it is driven by changes in system demand and generation – in this case NESO-driven recommendation and customer connections. Although the project also has non-load related drivers in the form of asset health issues, it still qualifies for the Load Re-opener given the other drivers.

4.139 NGET proposed that Tilbury 275kV Rebuild should proceed through Assessment Track 3. This is primarily because the optioneering is currently in early stages, with no preferred option currently identified. We agree with this reasoning and have decided it will be allocated to Assessment Track 3 and proceed to the standalone NCA stage.

4.140 At the NCA stage, we require NGET to provide, as a minimum:

- confirm selection of a preferred option, with associated evidence of scope and design maturity, as well as quantitative comparative analysis (eg detailed CBA given the significant range of costs between options shortlisted);
- if a non-PASE aligned option is to be recommended, detailed justification of the reasoning why the PASE-aligned options considered were dismissed.
- maturity of optioneering narrative, with some inconsistencies between option narrative across the eligibility submission;
- greater specificity regarding the interactions of the Tilbury substation rebuild with ASTI (eg TWNC) and other regional projects (eg Warley). This must include details on how each project interacts to deliver the various project drivers, how the varied maturity of project drivers (eg what is contractually fixed or is dependent on other projects) interact, and how delay across different projects may impact delivery; and
- evidence of stakeholder engagement, which is acknowledged by NGET as currently minimal.

4.141 As Tilbury is a strategically important project through delivering NESO identified network operability and LE1 boundary uplift, we are minded-to apply the Major

Projects ODI-F. More information can be found in the Major Projects ODI-F annex.

Warley 275kV Substation Replacement

4.142 The Warley project proposes the replacement of the existing Warley 275kV substation, close to London, with a new 400kV SF6-free GIS double-busbar substation. The investment is intended to facilitate customer connections, address asset health and reliability concerns associated with the existing infrastructure, and support the NESO's strategy to uprate the regional transmission network from 275kV to 400kV.

- £389.090m project forecast costs
- £29.053m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)
- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 3
- Minded to apply the Major Projects ODI-F

4.143 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure as it addresses a combination of load-related drivers and wider system planning needs.

4.144 NGET selected its preferred solution (new indoor 400kV GIS substation) as it provides a balance between technical performance, environmental impacts, deliverability, cost and stakeholder considerations. The proposed GIS solution is also intended to accommodate future expansion requirements and support NESO's longer-term plans for regional network development. NGET identified that the preferred solution as not being PASE-aligned. We agree that the project is not PASE-aligned.

4.145 NGET proposed that Warley should proceed through Assessment Track 2. We disagree and have decided that this project should be assigned to Assessment Track 3 and proceed to standalone NCA stage for additional scrutiny. This is because the project forecast costs exceed the £300m materiality threshold under the Load Re-opener Guidance for Assessment Track 2 projects.

4.146 Additionally, there remain limitations and uncertainties in the provided submission. The preferred design is still being refined because of Connections Reform outcomes and other future system needs. The cost benefit analysis also uses assumptions that will need further testing at later stages. There are delivery

dependencies and risks, including planning consent in the Green Belt, land rights, interacting outages, and stakeholder interfaces.

4.147 At the NCA stage, we require NGET to provide, as a minimum:

- updated assumptions and evidence following connections reform and any customer point-of-connection changes;
- consenting engagement and mitigations of identified challenges;
- increased certainty regarding future system requirements, including potential reactive compensation, series reactors and additional circuits;
- greater specificity regarding the interactions with other regional projects (eg Tilbury). This must include details on how each project interacts to deliver the various project drivers, how the varied maturity of project drivers (eg what is contractually fixed or is dependent on other projects) interact, and how delay across different projects may impact delivery; and
- consumer value associated with the preferred solution.

4.148 As Warley is a strategically important project driven by system planning, and customer connections, we are minded to apply the Major Projects ODI-F. More information can be found in the Major Projects ODI-F annex.

SHET submissions

Consultation questions

EAQ6. Do you agree that this SHET project is eligible for PCF funding under Part F of Special Condition 3.15?

Shetland On-Island Infrastructure

4.149 The second of three stages of work to expand the Shetland Transmission network via 220kV and 132kV networks. This project encompasses a new Yell substation, Northern Shetland substation and Central Shetland substation (Kergord 2), a connection from Yell to mainland Shetland including new subsea cable, and connections between the other substations and to the existing Kergord substation on mainland Shetland. This reinforces the Shetland network, and facilitates the connection of new generation customers, including Energy Isles (subject of a separate EA) at 120MW, Beaw field at 102MW, hydrogen demand totalling 856.8MW and battery storage of 55MW (subject to connection reform outcomes).

- £1,160.995m project forecast costs
- £81.462m proposed PCF funding under Part F of SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable (PCF_t and PCFRE_t)

Consultation: RIIO-ET3 Load Re-opener May 2026 Draft Determinations: Eligibility
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- Eligible for the Load Re-opener under Part D of SpC 3.18 Load Re-opener and Price Control Deliverable (LR_t)
- Proposed Assessment Track by the ETO: Track 2
- Confirmed Assessment Track by Ofgem: Track 3

4.150 We have decided that this project is eligible for the Load Re-opener, as it meets the requirements set out in SpC 3.18. The project is above the £40m materiality threshold, and classifies as Load Related Expenditure as it reinforces the Shetland Network.

4.151 SHET proposed that Shetland on Island Infrastructure should proceed through Assessment Track 2. We disagree and have decided that this project should be assigned to Assessment Track 3. This is because the project forecast costs are over the £300m materiality threshold for a project to be assigned to Assessment Track 3 for additional scrutiny.

4.152 SHET states that its preferred solutions are either PASE Variant or PASE Primary options. Through our assessment we determine that the preferred design is a mix of PASE Variant and non-PASE-aligned as summarised below:

- SHET has stated that its GIS substations are PASE Variant due to proximity with the coast. Our assessment has determined that the evidence provided is not sufficiently detailed to justify the use of indoor GIS, as coastal proximity alone is not a relevant criterion for PASE alignment.
- SHET has stated that its 132kV OHL design is PASE Primary however the proposed circuits between Central and Kergord require three OHL circuits, two of which will be a double circuit and one that is a single circuit. This is considered non-PASE-aligned as the PASE Primary criteria requires double circuit OHL only.
- The UGC section at 220kV require further justification to consider them as PASE Variant.
- The 220kV OHL sections are PASE Variant.

4.153 SHET has consistently opted for 400kV switchgear equipment due to limited supply chain availability of SF6-free 275kV equipment. The rationalisation of 220kV circuits and substations therefore remains insufficient and further analysis on the option to increase to 400kV is required. This should also include optioneering around the refurbishment, uprating or replacement of the existing Kergord converter station and 600MW HVDC cable when it reaches end of life.

4.154 Additionally, there is a very high uncertainty on cost for this project. We would expect the project development and costs to be at a higher maturity before the next Assessment Stage.

4.155 At the NCA stage we require SHET to provide, as a minimum:

- Further justification of the proposed solution, including rationalisation for indoor GIS beyond proximity to the coast, and a comparison of the proposed 220kV option with 400kV option;
- Evidence of end-of-life consideration of the current HVDC link and how that might impact Shetland transmission infrastructure;
- Clarification on the lengths and routes of 132kV OHL and UGC between Central and Kergord; and
- A cost benefit analysis on the proposed towers vs standard towers.

Ineligible applications

NGET submissions

Consultation questions

EAQ7. Do you agree with our assessment that the ETRE project is ineligible for the Load Re-opener?

ETRE - Eggborough to Thorpe Marsh reconductoring

4.156 A reinforcement project involving reconductoring of the Eggborough–Thorpe Marsh 400kV single circuit in Yorkshire, to increase capacity and unlock upstream constraints, including uplift on the B8 boundary.

- £40.670m project forecast costs

4.157 We do not consider the ETRE project to be eligible for the Load Re-opener, as it did not meet the requirements set out in SpC 3.18. In the RIIO-ET3 licences, for a Load Re-opener output under SpC 3.18 ‘investment is expected to cost more than £40m of capital expenditure’. We do not consider that the ETRE project meets this requirement.

4.158 Our assessment indicates that ETRE only exceeds the £40m materiality threshold because of the inclusion of a substantial 32% risk and contingency allowance. In our view, the risk and contingency allowance is too high. It is well above the standard 10% that we set at RIIO-ET3 FDs, and NGET has not provided sufficient evidence to justify a risk and contingency allowance above this level. In response to our questions NGET indicated that ETRE is not materially riskier than comparable transmission projects. With the proposed 32% risk and contingency allowance, the total project cost is only marginally above the materiality threshold. A lower risk allowance would therefore bring the total forecast project cost below the £40m materiality threshold.

4.159 Our view is that the ETRE project is ineligible for funding under the Load Re-opener as we expect the total project cost to be lower than the £40m materiality threshold, and that the submitted total project cost includes a high risk and contingency allowance that has not been sufficiently justified.

Thematic issues

Pre-Construction Funding (PCF)

Consultation questions

EAQ8. Do you agree with our approach to setting PCF allowances for eligible projects?

4.160 RIIO-ET3 FDs set the funding level for PCF at 8.2% of forecast project costs for load and shared-driver projects. PCF is also subject to the RIIO-ET3 FDs 1% per annum ongoing efficiency challenge. Our assessment of PCF for Eligibility Letters submitted in the May 2026 Load Re-opener window continues to apply the funding level and ongoing efficiency challenge set at RIIO-ET3 FDs for eligible projects.

4.161 ETOs included estimates of the PCF for each submitted project that differed from the 8.2% funding level, reflecting the specific circumstances of each project and the maturity of forecast costs. NGET's requested PCF used 8.2% of forecast costs for each project, whereas SHET used project-specific PCF estimates.

4.162 In our assessment of the May 2026 Load Re-opener Eligibility Letter submissions, we have reviewed the composition of submitted forecast costs and assumptions used to develop these estimates. Through this review we have identified variations in the assumptions used to develop forecast costs and have applied adjustments to address this when calculating PCF allowances. In particular, we propose to apply adjustments for risk and contingency allowance and biodiversity cost estimates in total forecast costs, discussed in further detail in the following sections. We have followed a consistent approach to adjusting forecast costs and setting PCF across all eligible May 2026 Load Re-opener Eligibility Letter submissions.

4.163 As specified in the Load Re-opener Guidance and Submission Requirements Document, ETOs should include details of historical funding interactions where funding has been provided for the same underlying need. Where relevant, we have taken into account historical funding interactions when setting PCF. For May 2026 Load Re-opener Eligibility Letter submissions, this only applies to one SHET project (Energy Isles) that received some prior funding in ET2.

Consultation: RIIO-ET3 Load Re-opener May 2026 Draft Determinations: Eligibility Assessment annex

4.164 Our adjustments to forecast costs and the proposed PCF allowances for each project, reflecting the approach discussed above, are set out in Table EA1.

Risk and Contingency allowance

Consultation questions

EAQ9. Do you agree with our approach to Risk and Contingency Allowance for projects submitted to the Load Re-opener?

4.165 Each May 2026 Load Re-opener Eligibility Letter submission included an estimated allowance for risk, ranging from less than 1% to over 30% of estimated direct costs. The approach set out in RIIO-ET3 FDs is to cap the risk and contingency allowance for load and non-load capex at 10% of direct project costs. The estimate of direct costs we have used depends on the data available in the Eligibility Letter submissions. We have either used submitted costs attributed to specific assets (e.g. substation, OHL, or cable works) as direct costs, or used submitted direct costs and adjusted for biodiversity costs and risk and contingency allowance included within these estimates. This is consistent with the approach we have followed in our PA, discussed in further detail in the accompanying Project Assessment Annex.

4.166 All but two Eligibility Letter submissions included a risk and contingency allowance above the level set at RIIO-ET3 FDs. From the information provided in ETOs' applications we do not consider that sufficient justification has been provided to include a project risk and contingency allowance above the level set at RIIO-ET3 FDs. Therefore, we propose to apply an adjustment to forecast costs, setting a cap at 10% of direct project costs, consistent with RIIO-ET3 FDs.

Biodiversity costs

Consultation questions

EAQ10. Do you agree with our approach to Biodiversity costs for projects submitted to the Load Re-opener?

4.167 Each May 2026 Load Re-opener submission included estimated costs for meeting biodiversity legislative requirements related to the project, ranging from less than 1% to over 4% of submitted forecast costs. The early stage of project development means that detailed information on specific biodiversity impacts, and proposed enhancement, is not available. Therefore, we do not have sufficient information to undertake a detailed assessment of these estimates.

4.168 However, we propose to address the variation observed in biodiversity estimates across projects by applying a cap at 3.5% of forecast costs when calculating PCF allowances for each project. The cap is set at the percentage of biodiversity costs included in submitted forecast costs, across all May 2026 Load Re-opener Eligibility Letter submissions. As there is limited data available at present on biodiversity-related costs in project forecasts, we intend to continue to review the efficient level for biodiversity costs as further data becomes available in future Load Re-opener application windows.

Battery Energy Storage System oversubscription

4.169 In the joint open letter from [DESNZ and Ofgem on connections reform delivery](#), we highlighted concerns about the oversupply of Battery Energy Storage System (BESS) projects in the connections queue. This exceeds both the Clean Power 2030 deployment range and projected 2035 system needs. The surplus is largely driven by protections afforded to advanced projects under the connections methodology established post connection reform. This creates a risk that non-viable projects could drive unnecessary network investment, increase costs for consumers, or delay other projects if they do not exit the queue in a timely manner.

4.170 Several May 2026 Load Re-opener Eligibility Letter submissions proposed extending or developing new substations, citing battery storage customer connections as needs case drivers. Given the level of battery oversubscription, we have assessed these applications with this risk in mind. In particular, we have considered whether the TOs' preferred options meet customer connection obligations while reducing the risk that consumers fund network investments that may not be needed should connecting customers later leave the queue.

4.171 We are also continuing to work with NESO, network companies and project developers to better understand the impact of the battery surplus. This supports our wider aim of ensuring connections reform minimises consumer costs and enables timely issuance of high-quality, robust connection offers across all technologies, in support of clean power and growth objectives.

4.172 Overall, we consider BESS to minimally impact our EA of projects where it was a driver. BESS is not the sole driver or primary driver on any of the projects in this re-opener window, meaning that the risk to consumers of committing investment on projects that will later turn out to be not needed appears to be small at this stage in the Load Re-opener regulatory process. Should circumstances change between now and PA decision we can revisit our assessments through the Material Change process set out in the Load Re-opener Guidance and Submission Requirements Document.

Cross-project feedback for ETOs

4.173 Overall, we were satisfied with the quality of applications by ETOs, with no applications ruled out due to missing content or quality concerns. However, there are some areas we expect to see improved in future applications, noting this is the first application window and so improvement is expected over time.

4.174 The key areas for improvement are:

1. Full compliance with publication requirements, including adherence to the [Redaction Policy](#). ETOs should publish full re-opener applications in accordance with the Re-opener Guidance and Application Requirements. Redactions should only be made where necessary, and ETOs should explain the nature of the redaction and the reasons for them.
2. Assessment Track 2 should not be proposed if the project does not meet the relevant criteria. For example, there were several applications for Assessment Track 2 that were over the £300m materiality threshold.
3. No applications should be submitted that combine Assessment Stages. In such instances, we will assess the first Assessment Stage of the application only.
4. The relationship of projects to other funding mechanisms should be fully transparent. For example, why the project is not eligible for funding through the Connections Volume Drivers should be clearly explained.
5. Cost changes between different applications should be clearly explained and justified. This includes different Application Stages within the Load Re-opener, as well as relative to other submissions made to Ofgem as part of wider engagement (eg the Load Board or RIIO-ET3 business plans).
6. The recommendation of the ETO as to whether the Major Projects ODI-F and/or ITA should be applied to the project or not should be provided, with accompanying reasoning. Only some ETOs included this detail in their applications.
7. CBAs, particularly those submitted under Assessment Track 2 for non-PASE-aligned Early Option Needs Case approval, should be more robust. Methodologies should stress-test a wider range of uncertainties and future scenarios, and provide clearer evidence for key inputs, including long-term maintenance assumptions.

5. Conclusions and next steps

- 5.1 We welcome your responses to this consultation, both on the proposals set out in this document and on the specific questions included in Chapter 4. Please send your response to: ReopenerConsultations@ofgem.gov.uk. The deadline for response is 24 September 2026.
- 5.2 We will carefully consider all consultation responses and aim to conclude our assessment of the projects under the Load Re-opener mechanism with a decision by November 2026, in line with the six-month assessment period set out in the Load Re-opener guidance.
- 5.3 To give effect to our decision, we have included a draft direction in the appendices of the EA Annex, which sets out for consultation the text of our proposed direction. We will issue directions to set out any adjustments alongside our Final Determinations.

Send us your feedback

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

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

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

Appendix 1. Further information on optioneering

A1.1 Below we have listed the options which were considered by the ETO for the projects.

NGET applications

Aberthaw – Site Strategy

- A: Do nothing
- B: Market-based solution
- C: Non-transmission, whole systems solutions (DNO).
- D-1: Utilise existing AIS substation with ‘do minimum’ approach.
- D-2: Utilise existing AIS substation, whilst providing a GIS or AIS extension for additional bays.
- E-1: New substation build, AIS, cabled to existing OHL towers.
- E-2: New substation build, GIS, cabled to existing OHL towers.
- E-3: New substation, AIS, OHL realignment to the rebuilt substation.
- E-4: New substation, GIS, OHL realignment to the rebuilt substation.
- E-5: New GIS substation – minimal land take. Phased build to allow for the demolition of old 275 kV and rebuild 132 kV in place.
- E-6: New GIS substation – minimum land take. Phased build to allow for demolition of old 132 kV first.
- E-7: New substation, transmission voltage built at 400kV, interbus transformers provided locally.
- E-8: New substation, transmission voltage built at 275kV, 400kV interbus transformers provided locally or remotely.

Banwen (Rhigos B)

- A: Do minimum, with the network kept in its current state and no new connections facilitated.
- B: Market-based solution, accommodating increased customer demand through the procurement and use of ancillary services only.
- C: Non-transmission whole-systems solution, with the required customer connection accommodated by a DNO instead of NGET.
- D: Extension of the existing Rhigos 400kV substation.
- E-1: New 400kV double busbar, double circuit turn-in AIS substation on the eastern side of the preferred site.
- E-2: New 400kV double busbar, double circuit turn-in AIS substation on the western side of the preferred site.
- E-3: New 400kV GIS substation.

Berkswell

- A-1: Do nothing, with no new connections facilitated.
- B-1: Accommodate increased customer demand through the procurement and use of ancillary services only.
- C-1: Accommodate the required customer connection through a Distribution Network Operator solution.
- D-2: Mesh corner connection from an extended substation with SGTs located remotely in a separate compound to the existing 275kV substation.
- D-3: Mesh corner connection from an extended substation with SGTs located within the extended existing 275kV compound.
- E-4: New offsite double busbar substation to meet HS2 needs and provide additional capacity.

Blyth 400kV Site Strategy

- A: Do minimum
- B: Market-based solution
- C: Non-transmission, whole systems solution
- D: Extension or rebuild of Blyth substation.
- E-1: New permanent 400kV GIS substation at Blyth (NEP1 Land).
- E-2: New Standalone 400 kV GIS Substation with NSL Diversion and 400kV Layout Rationalisation (NEP1 Land).
- E-3: Permanent 400kV DBB Indoor AIS Substation (NEP1 Land).
- E-4: Permanent 400kV Wrap around AIS Substation (NEP1 Land).
- E-5: Phased Connection Approach – Temporary AIS Extension followed by New Indoor 400kV AIS Substation (Off-site).
- E-6: New Indoor Standalone 400kV AIS Substation (Off-Site).
- X1A: Phased Connection Approach - Temporary AIS Extension followed by New 400 kV GIS Substation (NEP1 Land).
- X1B: Phased Connection Approach - Temporary AIS Extension followed by New 400 kV GIS Substation (NEP1 Land), without NSL Diversion.
- X2: Phased Connection Approach –Permanent GIS Extension and Build New 400kV GIS substation (NEP1 Land).

Bodelwyddan 400kV Extension

- A: Do minimum, maintaining the network in its current state and not facilitating the new connections.
- B: Market-based solution, accommodating customer demand through the procurement and use of ancillary services only.

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- C: Non-transmission whole-systems solution, with the required customer connection accommodated by a DNO instead of NGET.
- D-1: Extension of Bodelwyddan substation to the west, retaining the existing circuit arrangement.
- D-2: New GIS extension to the west and reconfiguration of the existing 4ZB connection to form a new double turn-in arrangement.
- D-3: New GIS extension to the west and three new OHL circuits into new bays, reusing an existing bay and cable circuit.
- D-4: New GIS extension to the west with two new OHL circuits, reusing the existing 4ZB infrastructure and uprating the existing 4ZB cable section.
- D-5: New detached GIS substation to the west, connected via GIB to the existing substation, with a new double turn-in of the 4ZB circuits.
- D-6: Offline-built SF6-free GIS hall adjacent to the existing site with a double turn-in arrangement.
- D-7: Offline-built SF6-free GIS hall and single-bay extension of the existing GIS hall with a double turn-in arrangement.
- D-8: Offline SF6-free GIS substation with repurposing of an existing redundant feeder bay into a customer bay.
- E-1: New AIS substation at Bodelwyddan with a new double turn-in of the 4ZB circuits.
- E-2: New remote AIS substation near Bodelwyddan with a new double turn-in of the 4ZB circuits.

Bolney 400kV Site Strategy

- D-1: AIS extension of existing 400kV busbar with tertiary connection.
- D-2: AIS extension of existing 400kV busbar with a new Bus Coupler 1 Bay and Grid Park Connection.
- D-3: AIS extension of existing 400kV busbar with new Super Grid Transformer (SGT) 6 Bay and Grid Park Connection.
- D-4: Extension of 400 kV Substation by AIS busbar connection with new GIS Substation.
- E-1: Complete New AIS/GIS Substation.

Bridgend

- A: Do minimum, maintaining the network in its current state and not facilitating the new connections.
- B: Market-based solution
- C: Non-transmission, whole systems solution

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- D-1: Reinforce existing substations and circuits to accommodate new demand and generation, including significant uprating at Pyle, Margam, Swansea North, Cilfynydd and Baglan Bay.
- E-1: DEV6 outdoor AIS substation with double-circuit turn-in of the Swansea-Cilfynydd 1 and 3 circuits.
- E-2: DEV6 GIS substation with double-circuit turn-in of the Swansea-Cilfynydd 1 and 3 circuits.
- E-3: DEV6 AIS double-busbar wrap-around / triple-in-line substation.
- E-4: DEV7 AIS substation (south-facing 132kV) with upgrades to the existing B4280 road.
- E-5: DEV7 AIS substation (south-facing 132kV) with a new access road connecting to the A4061 through common land.
- E-6: DEV7 GIS substation with double-circuit turn-in of the Swansea-Cilfynydd 1 and 3 circuits.
- E-7: DEV7 AIS substation (north-facing 132kV) with upgrades to the B4280.
- E-8: DEV7 AIS substation (north-facing 132kV) with a new access road through common land.
- E-9: DEV7 AIS double-busbar wrap-around / triple-in-line substation.
- E-10: DEV7 reduced-footprint AIS 400/132kV substation with demand connected at the transformer low-voltage side.
- E-11: DEV7 reduced-footprint SF₆-free GIS 400/132kV substation with demand connected at the transformer low-voltage side.

East Claydon – Enderby – Patford Bridge

- A: Do nothing, with the network kept in its current state and no circuit upgrades made.
- B: Hotwiring, meeting the increased rating by operating the circuit at a higher temperature.
- C: Install power flow control devices, enabling active control and redistribution of power flows on the network circuit.
- D: Reconducting and hotwiring, meeting the increased rating by hotwiring where possible and reconducting where necessary.
- E-1: Reconductor the ZL circuit with Matthew GAP and the 4WP route with Araucaria conductors.
- E-2: Reconductor with Warwick and Araucaria conductors.
- E-3: Reconductor with TS Bersfort and Araucaria conductors.
- E-4: Reconductor with Curlew and Araucaria conductors.
- E-5: Reconductor with Curlew and Redwood conductors.
- E-6: Reconductor with Matthew GAP and Redwood conductors.
- E-7: Reconductor with Twin Totara conductor.

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- E-8: Reconductor with Twin Sorbus conductor.
- E-9: Reconductor with Twin London conductor.
- E-10: Reconductor with Collybia conductor.
- E-11: Reconductor with Holmes conductor.
- F: Build a new 400kV overhead line.
- G: Dynamic line rating using real-time monitoring and dynamic calculation of line capacity.

Farmoor

- D-1: Extension of Cowley Substation.
- D-2: Extension of Didcot Substation.
- E-1A to E-1D: New 4-bay AIS single circuit turn-in substation variants.
- E-2: New 11-bay AIS substation with double circuit turn-in between towers 4TE043 and 4TE044.
- E-3: New 11-bay AIS substation with double circuit turn-in at tower 4TE039.
- E-4: New 11-bay GIS substation with double circuit turn-in at tower 4TE039.
- E-5: New 11-bay AIS substation with four future bays and double circuit turn-in at tower 4TE040.
- E-6: New 11-bay SF6-free GIS substation with six future bays and double circuit turn-in at tower 4TE040.
- E-7: New 11-bay SF6-free GIS substation with six future bays and double circuit turn-in between towers 4TE040 and 4TE041.

Feckenham – Hams Hall OHL

- A: Do nothing, with the network kept in its current state and no circuit upgrades made.
- B: Hotwiring, meeting the increased rating by thermally uprating the existing line to safely operate at a higher conductor temperature.
- C: Install power flow control devices, enabling active control and redistribution of power flows on the network circuit.
- D-1: Reconductor the existing circuit with Matthew GAP conductor.
- D-2: Reconductor with Warwick conductor.
- D-3: Reconductor with TS Bersfort conductor.
- D-4: Reconductor with Curlew conductor.
- D-5: Reconductor with Twin Zebra conductor.
- D-6: Reconductor with Twin Collybia conductor.
- D-7: Reconductor with Twin Totara conductor.
- D-8: Reconductor with Twin Sorbus conductor.
- D-9: Reconductor with Twin London conductor.

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- D-10: Reconductor with Twin Araucaria conductor.
- D-11: Reconductor with Holmes conductor.
- E: Upgrade the 275 kV network to 400 kV.
- F: Build a new 400 kV overhead line.
- G: Dynamic line rating using real-time monitoring and dynamic calculation of line capacity.

Feckenham – Ironbridge OHL

- A: Do nothing, with the network kept in its current state and no circuit upgrades made.
- B: Hotwiring, meeting the increased rating by thermally uprating the existing line to safely operate at a higher conductor temperature.
- C: Install power flow control devices, enabling active control and redistribution of power flows on the network circuit.
- D-1: Reconductor the existing circuit with Matthew GAP conductor.
- D-2: Reconductor with Warwick conductor.
- D-3: Reconductor with TS Bersfort conductor.
- D-4: Reconductor with Curlew conductor.
- D-5: Reconductor with Twin Zebra conductor.
- D-6: Reconductor with Twin Collybia conductor.
- D-7: Reconductor with Twin Totara conductor.
- D-8: Reconductor with Twin Sorbus conductor.
- D-9: Reconductor with Twin London conductor.
- D-10: Reconductor with Twin Araucaria conductor.
- D-11: Reconductor with Twin Holmes conductor.
- E: Upgrade the 275kV network to 400kV.
- F: Build a new 400kV overhead line.
- G: Dynamic line rating using real-time monitoring and dynamic calculation of line capacity.

Imperial Park 400/132kV Upgrade

A1.2 Stage 1

- A: Do nothing, with the network kept in its current state and no new connections facilitated.
- B: Market-based solution, accommodating increased customer demand through the procurement and use of ancillary services only.
- C: Whole-systems solution, with the required customer connection accommodated by a DNO instead of NGET.
- D-1: Connection of the current mesh corner.

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- E-1: New-build substation using alternative mesh-based layouts, including a 2-switch mesh on NGET land adjacent to the existing substation.
- E-2: New 400/132kV AIS/GIS substation on land adjacent to the existing Imperial Park substation.

A1.3 Stage 2 – New-build substation options

- E-3: New 400/132 kV AIS substation with space for a CDM area.
- E-4: New 132 kV AIS and 400kV GIS using a larger compound with space for a CDM area.
- E-5: New 132 kV/400kV GIS using a smaller compound and without space for a CDM area.
- E-6: Construction of a new 400/132kV GIS substation at alternate sites (areas 9-2 and 4-2 of the siting study).
- E-7: Construction of a new 400/132kV GIS substation on Welsh Government land (NGED land).
- E-8: Construction of a new 400/33kV GIS substation by building SGTs and 33kV switchgear on customers' land.
- E-9: Construction of a new 400/33kV GIS substation on NGED's land.
- E-10: Construction of a new 400/132kV GIS substation adjacent to the existing Imperial Park substation consisting of 3 x 240 MVA SGTs.

A1.4 Stage 3 – Existing-site upgrading options

- D-2: Upgrade existing 400/33 kVSGTs to 400/132kV and install a third 400/132kV transformer.
- D-3: Install two new double-wound 400/132/33kV transformers.
- D-4: Upgrade existing SGTs (400/33kV to 400/132kV) using one AIS DCB bay and one conventional AIS bay.
- D-5: Upgrade existing SGTs (400/33kV to 400/132kV) using DCB bays.

Ince SGT Extension

- A: Do nothing, with the network kept in its current state and no new connections facilitated.
- B: Market-based solution, accommodating increased customer demand through the procurement and use of ancillary services only.
- C: Whole-systems solution, with the required customer connection accommodated by a DNO.
- D-1: New SGT at Capenhurst 275kV with long 132kV export to Ince via a ducted cable along the A5117.

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- D-2: New SGT at Capenhurst 275kV with an alternative long-route 132kV ducted cable export broadly parallel to the Frodsham-Capenhurst 400kV OHL.
- D-3: Hybrid 132kV export solution from Capenhurst 275kV (OHL/cable).
- D-4: Ince-sited SGT with a hybrid 400kV connection [three route variants A, B, D]
- D-4 A: OHL route connection at tower 4ZE020.
- D-4B: Direct OHL route avoiding railway development land.
- D-4D: Hybrid OHL-cable route connection at tower 4ZE020.
- D-5: Ince-sited SGT with fully underground 400 kV cable [two route variants A, B]
- D-5A: Fully underground 400kV cable route connection at tower 4ZE021.
- D-5B: Fully underground 400kV cable route with extended HDD from tower 4ZE021.
- E-1: Complete new standalone AIS/GIS transmission substation.

Keadby 132kV

- A: Do nothing, with the network kept in its current state and no new connections facilitated.
- B: Market-based solution, accommodating increased customer demand through the procurement and use of ancillary services only.
- C: Non-transmission whole-systems solution, with the required customer connection accommodated by a DNO.
- D: Re-use of the existing cable from the LV side of the 400/132kV transformers at the Keadby 400kV Substation to the corresponding transformer bays at the Keadby 132kV GIS substation.
- E: Installation of new XLPE cable from the LV side of the 400/132kV transformers at the Keadby 400kV Substation to the corresponding transformer bays at the Keadby 132kV GIS substation.

Kingsnorth 400kV Extension

- A: Do nothing, with the network kept in its current state and no new connections facilitated.
- B: Market-based solution, accommodating increased customer demand through the procurement and use of ancillary services only.
- C: Whole-systems solution, addressing the identified need through coordinated interventions across the wider electricity system instead of constructing new transmission assets.
- D-1: Extend the existing 132kV AIS Kingsnorth substation for the addition of 2 x 240MVA SGTs and additional customer bays.

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- D-2: Extend Kingsnorth 400kV substation via x2 dedicated bays to 4 x 400/33kV 150MVA transformers feeding x8 33kV AIS bays within the SGT compound.
- D-3: Extend Kingsnorth 400kV substation via x2 dedicated bays to 2 x 400/132kV 460MVA transformers feeding x2 132kV AIS bays.
- E-1: Construct a new 400/132kV AIS substation.

Laleham 132kV Extension

- A: Do nothing, with the network kept in its current state and no new connections facilitated.
- B: Market-based solution, accommodating increased customer demand through the procurement and use of ancillary services only.
- C: Whole-systems solution, with the required customer connection accommodated by a DNO.
- D-1: Extension of the existing 132kV GIS building and installation of a new busbar section.
- D-2: Extend the existing GIS hall with a new 132kV GIS building and connection with a new busbar section.
- E-1: Replace the existing Laleham 132kV GIS substation with a new 132kV AIS substation in the golf course area north of the existing substation.
- E-2: Replace the existing Laleham 132kV and 275kV substations with new 132kV and 400kV AIS substations.
- E-3: Build a new 400kV AIS substation and extend the existing Laleham 132kV GIS substation.
- E-4: Build a new 132kV AIS substation in the quarry area south of the existing Laleham 275kV substation.

Lower Frankton 400kV AIS Substation

- A: Do nothing, with the network kept in its current state and no new connections facilitated.
- B: Market-based solution, accommodating increased customer demand through the procurement and use of ancillary services only.
- C: Whole-systems solution, with the required customer connection accommodated by a DNO instead of NGET.
- D-1: Connection to Legacy Substation.
- D-2: Connection to Ironbridge Substation.
- E-1: Provision of a grid connection for GGC only, without full substation build-out via a 10 bay, 400kV AIS substation.
- E-2: New-build 18 bay 400kV AIS substation providing sufficient firm capacity for forecast growth.

- E-3: Larger new-build 24 bay 400kV AIS substation providing maximum future capacity and operational flexibility.

North West London

A1.5 SER4 Optioneering

- A: Do minimum, maintaining the network in its current state and not addressing the investment drivers.
- B: Market-based solution, meeting the investment drivers through the procurement and use of ancillary services only.
- C: Non-transmission whole-systems solution, meeting the investment drivers through DNO flexibility rather than NGET infrastructure investment.
- Y-1: Hotwire the existing Sundon-Elstree 2 circuit.
- Y-2: Reconductor the existing OHL route between Sundon and Elstree with a GAP conductor.
- Y-3: Reconductor the existing OHL route between Sundon and Elstree with a Rubus conductor.
- Y-4: Reconductor the existing OHL route between Sundon and Elstree with a Sorbus conductor.
- Y-5: Reconductor the existing OHL route between Sundon and Elstree with a Curlew conductor.
- Y-6: Reconductor the existing OHL route between Sundon and Elstree with a Warwick conductor.

A1.6 ESC1 Circuit Optioneering

- A: Do minimum, maintaining the network in its current state and not addressing the investment drivers.
- B: Market-based solution, meeting the investment drivers through the procurement and use of ancillary services only.
- C: Non-transmission whole-systems solution, meeting the investment drivers through DNO flexibility rather than NGET infrastructure investment.
- X-1: Use the existing cable tunnel.
- X-2: Construct a new surface line route between Elstree and St John's Wood substations.
- X-3: Construct a new OHL route between Elstree and St John's Wood substations.
- X-4: Construct a new tunnel between Elstree and St John's Wood.

A1.7 ESC1 Elstree Connection Optioneering

- E-1: 400kV SF6-free GIS extension of the existing building.

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- E-2: 400kV SF6-free GIS extension in the 132kV AIS area.
- E-3: 400kV SF6-free GIS extension in Greenfield northeast of the site.
- E-4: 400kV SF6-free GIS extension in the 275kV AIS compound.
- E-5: New 400kV AIS substation.

A1.8 ESC1 St John's Wood Connection Optioneering

- S-1: 400kV GIS busbar extension.
- S-2: 400kV GIS busbar extension into the SVC area.
- S-3: Tee-off into 400kV Shunt Reactor 1.
- S-4: Tee-off into 400kV SGT 7A.
- S-5: New 400kV GIS into the 275kV AIS building.
- S-6: Elstree 2 connection into ex-Shunt Reactor 1 bay.
- S-7: New 400kV AIS substation.

SCRE (COTT4 – STAY4) and WRRE (WBUR4 – RATS4) OHL

- A: Do nothing.
- B: Hotwire the existing circuit.
- C: Install power flow control devices.
- D-1: Reconductor with Matthew conductor.
- D-2: Reconductor with Warwick conductor.
- D-3: Reconductor with TS Bersfort conductor.
- D-4: Reconductor with Curlew conductor.
- D-5: Reconductor with Twin Zebra conductor.
- D-6: Reconductor with Twin Collybia conductor.
- D-7: Reconductor with Twin Totara conductor.
- D-8: Reconductor with Twin Sorbus conductor.
- D-9: Reconductor with Twin London conductor.
- D-10: Reconductor with Twin Araucaria conductor.
- D-11: Reconductor with Holmes conductor.
- E: Build a new 400kV circuit.
- F: Dynamic Line Rating.

Tees Dock

- A: Do minimum, maintaining the network in its current state and not facilitating the new connections.
- B: Market-based solution, accommodating customer demand through the procurement and use of ancillary services only.
- C: Non-transmission whole-systems solution, with the required customer connection accommodated by a DNO instead of NGET.

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- D-1: Extension or rebuild of Lackenby substation.
- D-2: Extension or rebuild of Greystones substation.
- E-1: New indoor AIS substation built on Teesworks estate land.
- E-2: New indoor GIS substation built on Teesworks estate land.
- E-3: New outdoor AIS substation built on other grantors' land.
- E-4: New outdoor AIS substation built on Teesworks estate land.

Tilbury

- D1: Targeted replacement of critical-risk 275kV assets.
- D2: Refurbishment of the existing 275kV substation.
- D3: Refurbishment of the existing 275kV substation with Warley circuits moved to the existing 400kV substation.
- D4: Refurbishment of the existing 275kV substation with interbus SGTs installed on the Warley circuits.
- D5a: Full in-situ rebuild and rationalisation of Tilbury 275kV as a 400kV AIS substation.
- D5b: Full in-situ rebuild and rationalisation of Tilbury 275kV as a 400kV GIS substation.
- D6a: Staged rationalisation of Tilbury 275kV to a 400kV AIS substation.
- D6b: Staged rationalisation of Tilbury 275kV to a 400kV GIS substation.
- E7a: Full off-site rebuild of the Tilbury 275kV and 400kV substations as a 400kV AIS substation.
- E7b: Full off-site rebuild of the Tilbury 275kV and 400kV substations as a 400kV GIS substation.

Warley 275kV Substation Replacement

- A: Do nothing, with the network kept in its current state and no new connections facilitated.
- B: Market-based solution, accommodating increased customer demand through the procurement and use of ancillary services only.
- C: Whole-systems solution, with the required customer connection accommodated by a DNO.
- D: Make use of existing assets by utilising the existing substation through extension, uprating or rebuild.
- E-1: In-situ replacement of the existing Warley 275kV substation.
- E-2: New offline 275kV GIS substation on existing NGET land.
- E-3: New offline 400kV GIS substation on existing NGET land.
- E-4: New 400kV AIS substation with 400kV cable connections.
- E-5: New 400kV AIS substation with 400kV OHL connections.
- E-6: New 400kV GIS substation with 400kV cable connections.

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- E-7: New 400kV GIS substation with 400kV OHL connections.
- E-8: New 400kV AIS substation with 400kV OHL connections and ZB OHL re-routing.
- E-9: New 400kV AIS back-to-back substation with OHL connections.

Willington 132kV Rebuild – Connection Assets

- A: Do nothing, with the network kept in its current state and no new connections facilitated.
- B: Market-based solution, accommodating increased customer demand through the procurement and use of ancillary services only.
- C: Whole-systems solution, with the required customer connection accommodated by a DNO.
- D: Re-use existing 132kV-side cables from the 400/132kV transformers at Willington to the corresponding transformer bays in the rebuilt substation.
- E-1: Northern SGT6/SGT7 routing and southern SGT1/SGT2 routes.
- E-2: Northern SGT6 routing and re-use of existing SGT7 trough.
- E-3: Dual northern SGT6/SGT7 routing.
- E-4: Northern SGT6 routing and re-use of existing SGT7 trough (alternative bay arrangement).
- E-5: Southern/eastern SGT6/SGT7 routing and re-use of existing SGT7 trough (original bay arrangement).
- E-6: Alternative bay arrangement with southern/eastern SGT6/SGT7 routing and re-use of existing SGT7 trough.

SHET applications

Energy Isles (Kergord) Windfarm Connection

- 1: Hybrid OHL and 132kV cable circuit between Yell 132kV substation and Energy Isles.
- 2: Full 132kV OHL circuit between Yell 132kV substation and Energy Isles.
- 3: Full 132kV UGC solution between Yell 132kV substation and Energy Isles.

Knocknagael Farigaig HVP

- Option A: Offline satellite STATCOM site connected to Knocknagael via a new 275kV underground cable.
- Option B: West extension of Knocknagael substation with the STATCOM contained within the substation.
- Option C: East extension of Knocknagael substation with the STATCOM contained within the substation.

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- Option D: West extension with a stepped platform and the STATCOM contained within the substation.
- Option E: East extension with a stepped platform and the STATCOM contained within the substation.

Loch Na Cathrach Cluster

A1.9 Shared Use Options:

- 1: Busbar extension to the east of Knocknagael 275kV substation.
- 2: Busbar extension to the west of Knocknagael 275kV substation.
- 3: Busbar extension to the Beaully 275kV busbar.
- 4: Farigaig 275kV substation connection.
- 5: Fasnakyle 275kV substation connection.

A1.10 Sole Use Options:

- 1: Approximately 7.5km of single-circuit 275kV UGC.
- 2: Approximately 7.5km of single-circuit 275kV OHL.

Shetland On-Island Infrastructure

- Option 1a: 132kV strategy with a single circuit between Yell and Northern substation, and three circuits from Northern substation to Kergord.
- Option 1b: 132kV strategy with two circuits between Yell and Northern substation, and three circuits from Northern substation to Kergord.
- Option 2a: 220kV strategy with a single circuit between Yell and Northern substation, and two circuits from Northern substation to Central substation, with three 132kV circuits to Kergord.
- Option 2b: 220kV strategy with a single circuit between Yell and Northern substation, and three circuits from Northern substation to Central substation, with three 132kV circuits to Kergord.
- Option 3: 275kV strategy.
- Option 4: 400kV strategy.

Appendix 2. Consultation questions overview

- A2.1 EAQ1. Do you agree that these NGET projects are eligible for PCF funding under Part F of Special Condition 3.15?
- A2.2 EAQ2. Do you agree with our assessment of the needs case for these NGET Assessment Track 2 projects?
- A2.3 EAQ3. Do you agree that these SHET projects are eligible for PCF funding under Part F of Special Condition 3.15?
- A2.4 EAQ4. Do you agree with our assessment of the needs case for these SHET Assessment Track 2 projects?
- A2.5 EAQ5. Do you agree that these NGET projects are eligible for PCF funding under Part F of Special Condition 3.15?
- A2.6 EAQ6. Do you agree that this SHET project is eligible for PCF funding under Part F of Special Condition 3.15?
- A2.7 EAQ7. Do you agree with our assessment that the ETRE project is ineligible for the Load Re-opener?
- A2.8 EAQ8. Do you agree with our approach to setting PCF allowances for eligible projects?
- A2.9 EAQ9. Do you agree with our approach to Risk and Contingency Allowance for projects submitted to the Load Re-opener?
- A2.10 EAQ10. Do you agree with our approach to Biodiversity costs for projects submitted to the Load Re-opener?

Appendix 3. Draft Direction for NGET and SHET's Pre-Construction Funding

Introductory note

- A3.1 Following our assessment of Load Re-opener submissions under Special Condition (SpC) 3.18 Load Re-opener and Price Control Deliverable, we have set out our Draft Determinations. Any decision to change existing or add additional Pre-Construction Funding (PCF) allowances for a project will be implemented into the Licensees' licence via a direction. This Appendix provides a draft of the direction that will implement our Final Determinations, as required by SpC 3.15 Pre-Construction Funding Re-opener and Price Control Deliverable. We intend to confirm the direction at the same time as setting out our Final Determinations.

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A3.2 Any representations with respect to the draft direction below must be made on or before 24 September 2026 to: ET Investment Determinations Team, Office of Gas and Electricity Markets, 10 S Colonnade, London, E14 4PU or by email to ReopenerConsultations@ofgem.gov.uk.

Draft Direction

To:

National Grid Electricity Transmission Plc

Scottish Hydro Electric Transmission Plc

Date: [to be inserted]

Proposed direction issued by the Gas and Electricity Markets Authority (“the Authority”) under Special Condition (“SpC”) 3.15 of the Electricity Transmission Licence held by the licensees listed above to adjust existing and provide new funding for projects eligible for the Pre-Construction Funding Re-opener.

5.4 Each of the licensees to whom this document is addressed (“the Licensees”) is the holder of an Electricity Transmission licence (“the Licence”) granted or treated as granted under section 6(1)(b) of the Electricity Act 1989 (“the Act”).

5.5 SpC 3.15 provides re-opener mechanism by which the Licensees may apply to adjust existing funding allowances or seek additional funding during the RIIO-3 price control period for pre-construction works associated with load-related projects. It also allows the Authority to direct a final value to reflect efficiently incurred expenditure, when full costs for the projects are established in SpC 3.18.

5.6 The Licensees applied under SpC 3.15 to add additional pre-construction funding for load-related projects in May 2026. The Authority publicly consulted on its Draft Determinations between 27 August 2026 and 24 September 2026. This document included a draft of the text of the proposed direction, as required by Part K of SpC 3.15.

5.7 We received [to be inserted] representations and have placed all non-confidential responses on our website. Having considered those responses, we have decided to proceed with making this direction.

5.8 This direction is issued pursuant to SpC 3.15 and sets out approved funding, adjustments to the value of relevant terms ($PCFA_t$ and PCF_t), the Regulatory Years to which that adjustment relates, approved outputs and the delivery dates. These are set out in Annex 1 (for NGET), Annex 2 (for SHET), and Annex 3 (for SPT) of this direction.

5.9 This direction will take effect immediately. This Direction constitutes notice stating the reasons for the purposes of section 49A(2) of the Act.

.....

Yours Sincerely,

Anita Payne

Deputy Director, Network Price Controls

For and on behalf of the Authority

[Date]

Annex 1: National Grid Electricity Transmission plc, Electricity transmission licence, Special Condition values and tables modified by this draft direction

New text is double underscored and text removed is double struck through.

Appendix 1 of Special Condition 3.15 Pre-Construction Funding allowance (PCFAt) (£m)

Total: <u><u>[300.14673.09]</u></u>
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Appendix 2 of Special Condition 3.15 Pre-Construction Funding Price Control Deliverable Allowance (PCFt) (£m)

EJP OSR	Output	Delivery date	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	Total Allowance
NGT500 440	Barking	31 March 2031	3.12	3.09	3.06	3.03	3.00	15.31
NGT500 538	East Claydon Rebuild	31 March 2031	4.52	4.47	4.43	4.38	4.34	22.14
NGT500 435	Fawley Strategy (Chilling - Fawley and Fawley S/S)	31 March 2031	5.09	5.04	4.99	4.94	4.89	24.94
NGT500 387	KEGWORTH 400KV S/S	31 March 2031	3.17	3.14	3.11	3.08	3.04	15.54

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103632-207168	Kirkstall 'A' - Skelton Grange Cable Replacement	31 March 2031	1.32	1.31	1.30	1.28	1.27	6.48
NGT500 541	Llandyfaelog (Camarthan) New Build	31 March 2031	5.27	5.21	5.16	5.11	5.06	25.81
NGT500 117	New Navenby 400kv S/S	31 March 2031	2.47	2.44	2.42	2.39	2.37	12.09
NGT400 034	Pembroke 400kV S/S	31 March 2031	2.42	2.39	2.37	2.35	2.32	11.86
NGT300 007	Sizewell 400kV Rebuild	31 March 2031	5.99	5.93	5.87	5.81	5.75	29.34
NGT500 439	St Johns Wood 275 kV Rationalisation	31 March 2031	0.95	0.94	0.93	0.92	0.91	4.66
103622-207157	West London Cables Strategy (Ealing - Laleham, Iver - North Hyde, Ealing Willesden)	31 March 2031	4.29	4.24	4.20	4.16	4.12	21.00
NGT500 381	WILLINGTON EAST 400KV S/S	31 March 2031	2.15	2.13	2.11	2.08	2.06	10.53
NGT500 381	WILLINGTON EAST 400KV S/S - Construction	31 March 2031	2.15	2.13	2.11	2.08	2.06	10.53
NGT500 472	DEESIDE - LEGACY - TRAWSFYNYDD 1, DEESIDE - LEGACY - TRAWSFYNYDD 2, IRONBRIDGE - LEGACY - SHREWSBURY, IRONBRIDGE - LEGACY 2	31 March 2031	2.82	2.79	2.77	2.74	2.71	13.83
NGT300 086	Ickenham HS2 - OHL and Cable Turn In/Tee Infrastructure	31 March 2031	0.00	0.00	0.00	0.00	0.00	0.00
NGT300 088	Ickenham HS2 - Substation Infrastructure	31 March 2031	0.88	0.87	0.86	0.85	0.84	4.31
NGT300 087	Ickenham HS2 Connection Work	31 March 2031	0.68	0.67	0.66	0.66	0.65	3.32

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NGT500 135	MIDL4 ENWL GSP BB Ext / SGTs / Turn-in	31 March 2031	1.26	1.25	1.24	1.22	1.21	6.19
NGT500 614	MIDL4 Green Energy Centre IRL Gen Bay	31 March 2031	0.00	0.00	0.00	0.00	0.00	0.00
NGT500 560	MIDL4 ENWL GSP BB Ext / SGTs / Turn-in	31 March 2031	0.46	0.46	0.45	0.45	0.44	2.27
NGT500 561	ENWL MIDL4 GSP CONNECTION	31 March 2031	0.25	0.25	0.25	0.25	0.24	1.24
NGT500 562	ENWL MIDL4 GSP Intertrip	31 March 2031	0.00	0.00	0.00	0.00	0.00	0.00
NGT500 468	NS Hinksey Cable	31 March 2031	1.55	1.53	1.52	1.50	1.49	7.58
NGT200 54	Quainton HS2 - OHL and Substation Infrass	31 March 2031	0.99	0.98	0.97	0.96	0.95	4.85
NGT200 52_01	Quainton HS2 Connection Assets - Sub wor	31 March 2031	0.61	0.60	0.60	0.59	0.58	2.98
103623- 207158	Imperial Park - Melksham and Cilfynydd - Whitson - Seabank – Construction	31 March 2031	5.92	5.87	5.81	5.75	5.69	29.04
tCSNP2	Feckenham to Minety 400kV A589 Circuit Reconductoring	31 March 2031	0.81	0.81	0.80	0.79	0.78	3.99
tCSNP2	Reconductoring of Carrington - Penwortham & Padiham - Penwortham 400kV circuits	31 March 2031	0.85	0.84	0.83	0.83	0.82	4.17
tCSNP2	Reconfigure Stalybridge - Thorpe Marsh 400kV circuit	31 March 2031	1.48	1.46	1.45	1.43	1.42	7.23
tCSNP2	Reconductor double circuits Norton “ Osbalwick (A347 & A355)	31 March 2031	1.93	1.91	1.89	1.87	1.85	9.45

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<u>NGT500</u> <u>535</u>	<u>Aberthaw - Site</u> <u>Strategy</u>	<u>31 March</u> <u>2031</u>	<u>40.21</u> <u>9</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>40.219</u>
<u>NGT500</u> <u>509</u>	<u>Banwen (Rhigos B)</u>	<u>31 March</u> <u>2031</u>	<u>3.247</u>	<u>6.321</u>	<u>5.124</u>	<u>0.000</u>	<u>0.000</u>	<u>14.692</u>
<u>NGT300</u> <u>089</u> <u>NGT200</u> <u>55_02</u>	<u>Berkswell</u>	<u>31 March</u> <u>2031</u>	<u>5.831</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>5.831</u>
<u>NGT500</u> <u>557</u>	<u>Blyth 400kV Site</u> <u>Strategy</u>	<u>31 March</u> <u>2031</u>	<u>0.795</u>	<u>2.041</u>	<u>26.89</u> <u>7</u>	<u>0.000</u>	<u>0.000</u>	<u>29.733</u>
<u>NGT300</u> <u>372</u> <u>NGT300</u> <u>425</u>	<u>Bodelwyddan 400kV</u> <u>Extension</u>	<u>31 March</u> <u>2031</u>	<u>11.44</u> <u>8</u>	<u>3.269</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>14.717</u>
<u>NGT500</u> <u>497</u>	<u>Bolney 400kV Site</u> <u>Strategy</u>	<u>31 March</u> <u>2031</u>	<u>4.601</u>	<u>3.135</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>7.736</u>
<u>NGT600</u> <u>099</u>	<u>Bridgend</u>	<u>31 March</u> <u>2031</u>	<u>4.120</u>	<u>18.01</u> <u>9</u>	<u>1.808</u>	<u>0.000</u>	<u>0.000</u>	<u>23.946</u>
<u>NGT500</u> <u>473</u>	<u>East Claydon – Enderby</u> <u>– Patford Bridge 1 and 2</u> <u>OHL</u>	<u>31 March</u> <u>2031</u>	<u>0.000</u>	<u>0.919</u>	<u>11.52</u> <u>0</u>	<u>0.000</u>	<u>0.000</u>	<u>12.439</u>
<u>NGT300</u> <u>431</u>	<u>Farmoor</u>	<u>31 March</u> <u>2031</u>	<u>2.766</u>	<u>1.674</u>	<u>4.297</u>	<u>1.427</u>	<u>0.000</u>	<u>10.164</u>
<u>NGT500</u> <u>470</u>	<u>Feckenham – Hams</u> <u>Hall OHL</u>	<u>31 March</u> <u>2031</u>	<u>0.000</u>	<u>0.000</u>	<u>0.291</u>	<u>3.694</u>	<u>0.000</u>	<u>3.985</u>
<u>NGT500</u> <u>430</u>	<u>Feckenham –</u> <u>Ironbridge OHL</u>	<u>31 March</u> <u>2031</u>	<u>0.000</u>	<u>0.434</u>	<u>5.474</u>	<u>0.000</u>	<u>0.000</u>	<u>5.908</u>
<u>NGT500</u> <u>280</u> <u>NGNLT3</u> <u>0660</u>	<u>Imperial Park</u> <u>400/132kV Upgrade</u>	<u>31 March</u> <u>2031</u>	<u>4.632</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>4.632</u>
<u>NGT500</u> <u>193</u> <u>NGT500</u> <u>112</u>	<u>Ince SGT Extension</u>	<u>31 March</u> <u>2031</u>	<u>0.777</u>	<u>1.982</u>	<u>1.838</u>	<u>0.000</u>	<u>0.000</u>	<u>4.597</u>
<u>NGT300</u> <u>206</u>	<u>Keadby (KEAD4)</u>	<u>31 March</u> <u>2031</u>	<u>4.088</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>4.088</u>

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<u>NGT300</u> <u>205</u> <u>NGT500</u> <u>626</u>								
<u>NGET10</u> <u>2038</u>	<u>Kingsnorth 400kV</u> <u>Extension</u>	<u>31 March</u> <u>2031</u>	<u>4.351</u>	<u>2.940</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>7.291</u>
<u>NGT500</u> <u>539</u>	<u>Laleham 132kV Site</u> <u>Strategy</u>	<u>31 March</u> <u>2031</u>	<u>9.761</u>	<u>6.630</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>16.392</u>
<u>NGT500</u> <u>040</u> <u>NGT500</u> <u>041</u>	<u>Lower Frankton - LFRA4</u> <u>400kV AIS Substation</u>	<u>31 March</u> <u>2031</u>	<u>0.000</u>	<u>4.285</u>	<u>10.99</u> <u>8</u>	<u>10.41</u> <u>1</u>	<u>0.000</u>	<u>25.694</u>
<u>NGT500</u> <u>432 /</u> <u>NGT500</u> <u>438</u>	<u>North West London</u>	<u>31 March</u> <u>2031</u>	<u>6.450</u>	<u>12.80</u> <u>9</u>	<u>10.73</u> <u>6</u>	<u>0.000</u>	<u>0.000</u>	<u>29.995</u>
<u>NGT500</u> <u>445</u> <u>NGT500</u> <u>446</u>	<u>SCRE (COTT4 – STAY4)</u> <u>and WRRE (WBUR4 –</u> <u>RATS4) OHL</u>	<u>31 March</u> <u>2031</u>	<u>12.03</u> <u>9</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>12.039</u>
<u>NGT500</u> <u>427</u>	<u>Tees Dock/ Teeside</u> <u>Connection Node A</u> <u>(Previously LACKENBY</u> <u>B) 400KV S/S -</u> <u>Construction</u>	<u>31 March</u> <u>2031</u>	<u>8.470</u>	<u>20.06</u> <u>2</u>	<u>20.54</u> <u>8</u>	<u>0.000</u>	<u>0.000</u>	<u>49.081</u>
<u>NGT500</u> <u>441</u> <u>NGT500</u> <u>528</u>	<u>Tilbury 275kV Rebuild -</u> <u>RIIO T3 Holistic Site</u> <u>Strategy</u>	<u>31 March</u> <u>2031</u>	<u>12.39</u> <u>7</u>	<u>5.075</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>17.472</u>
<u>NGT500</u> <u>546</u>	<u>Warley 275kV</u> <u>Replacement - Site</u> <u>Strategy</u>	<u>31 March</u> <u>2031</u>	<u>4.850</u>	<u>12.43</u> <u>0</u>	<u>11.77</u> <u>3</u>	<u>0.000</u>	<u>0.000</u>	<u>29.053</u>
<u>NGT500</u> <u>411</u>	<u>Willington 132kV</u> <u>Rebuild</u>	<u>31 March</u> <u>2031</u>	<u>1.026</u>	<u>2.224</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>3.250</u>

Annex 2: Scottish Hydro Electric Transmission Plc, Electricity transmission licence, Special Condition values and tables modified by this draft direction

New text is double underscored and text removed is double struck through.

Appendix 1 of Special Condition 3.15 Pre-Construction Funding allowance (PCFAt) (£m)

Total: [492.33606.67]

Appendix 2 of Special Condition 3.15 Pre-Construction Funding Price Control Deliverable Allowance (PCFt) (£m)

EJP OSR	Output	Delivery date	2026/27	2027/28	2028/29	2029/30	2030/31	Total Allowance
SHT20313	Dundee City Strategy Phase 1	31 March 2031	0.91	0.90	0.89	0.89	0.88	4.48
SHT20314	Dundee City Strategy Phase 1	31 March 2031	3.23	3.20	3.16	3.13	3.10	15.83
SHT20629	Dundee City Strategy Phase 1	31 March 2031	0.34	0.33	0.33	0.33	0.32	1.64
SHT20368	East Coast Network Investment	31 March 2031	7.89	7.81	7.73	7.66	7.58	38.67
SHT20346	Taynuilt – Creag Dhubh Reinforcement	31 March 2031	2.60	2.57	2.54	2.52	2.49	12.72
SHT20069	Coire Glas PSH Connection	31 March 2031	4.10	4.06	4.02	3.98	3.94	20.11
SHT20073	Coire Glas PSH Connection	31 March 2031	0.89	0.88	0.88	0.87	0.86	4.38
SHT20150	Coire Glas PSH Connection	31 March 2031	0.25	0.24	0.24	0.24	0.24	1.21

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SHT200689	Coire Glas PSH Connection	31 March 2031	0.04	0.04	0.04	0.04	0.04	0.19
SHT20083	Melgarve Cluster	31 March 2031	0.47	0.46	0.46	0.45	0.45	2.29
SHT20084	Melgarve Cluster	31 March 2031	0.16	0.16	0.16	0.16	0.16	0.80
SHT20092	Melgarve Cluster	31 March 2031	0.04	0.04	0.04	0.04	0.04	0.19
SHT20093	Melgarve Cluster	31 March 2031	0.41	0.41	0.40	0.40	0.39	2.01
SHT20289	Melgarve Cluster	31 March 2031	0.99	0.98	0.97	0.96	0.95	4.85
SHT20071	Strathy Cluster	31 March 2031	0.20	0.20	0.20	0.20	0.20	1.00
SHT20072	Strathy Cluster	31 March 2031	0.45	0.45	0.44	0.44	0.43	2.21
SHT20085	Strathy Cluster	31 March 2031	0.48	0.48	0.47	0.47	0.47	2.37
SHT20086	Strathy Cluster	31 March 2031	0.57	0.56	0.56	0.55	0.54	2.78
SHT20370	Strathy Cluster	31 March 2031	0.45	0.44	0.44	0.44	0.43	2.20
SHT20371	Strathy Cluster	31 March 2031	1.45	1.43	1.42	1.40	1.39	7.08
SHT20101	Mossy Hill	31 March 2031	0.05	0.05	0.05	0.05	0.05	0.26
SHT20102	Mossy Hill	31 March 2031	0.01	0.01	0.01	0.01	0.01	0.06

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SHT20522	Mossy Hill	31 March 2031	0.94	0.93	0.92	0.91	0.90	4.60
SHT20327	Tealing Solar and Storage Connection	31 March 2031	0.07	0.07	0.07	0.07	0.06	0.33
SHT20328	Tealing Solar and Storage Connection	31 March 2031	0.07	0.07	0.07	0.07	0.07	0.36
SHT20329	Tealing Solar and Storage Connection	31 March 2031	0.59	0.58	0.58	0.57	0.57	2.90
SHT20088	Clash Gour	31 March 2031	0.11	0.11	0.11	0.11	0.11	0.55
SHT20089	Clash Gour	31 March 2031	0.04	0.04	0.04	0.04	0.04	0.20
SHT20613	Clash Gour	31 March 2031	2.15	2.13	2.11	2.09	2.07	10.55
SHT20157	D'REAY GILLSBAY 132KV	31 March 2031	2.91	2.88	2.85	2.82	2.80	14.26
SHT20151	TCA Elchies Windfarm	31 March 2031	0.18	0.18	0.18	0.18	0.17	0.89
SHT20074	H1- Elchies Windfarm	31 March 2031	0.81	0.80	0.79	0.79	0.78	3.97
SHT20191	LT000366 - Loch Kemp Pumped Storage - TCA	31 March 2031	0.22	0.22	0.22	0.22	0.22	1.10
SHT20190	LT000367 - Loch Kemp Pumped Storage - H1	31 March 2031	1.07	1.06	1.05	1.04	1.03	5.26
SHT20281	LT000398 - Salamander Offshore Windfarm Connection - TCA	31 March 2031	0.13	0.13	0.13	0.13	0.13	0.64

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SHT20282	LT000399 - Salamander Offshore Windfarm Connection - H1 (Sole Use)	31 March 2031	0.00	0.00	0.00	0.00	0.00	0.00
SHT20283	LT000400 - Loch Nan Eun Pumped Storage - TCA	31 March 2031	0.18	0.18	0.18	0.18	0.18	0.90
SHT20284	LT000401 - Loch Nan Eun Pumped Storage - Sole Use (H1)	31 March 2031	1.53	1.51	1.50	1.48	1.47	7.49
SHT20495	LT000499 - Shin - Loch Buidhe OHL Reconductor	31 March 2031	1.54	1.52	1.51	1.49	1.48	7.54
SHT20505	LT000522 - Strathy Switching Station - TORI191	31 March 2031	1.36	1.35	1.33	1.32	1.31	6.66
SHT20156	LEWIS INFRASTRUCTURE	31 March 2031	1.58	1.56	1.55	1.53	1.52	7.73
SHT20306	LT000468 - Glendye Wind Farm TCA	31 March 2031	0.23	0.23	0.22	0.22	0.22	1.12
SHT20307	LT000469 - Glendye Wind Farm H1	31 March 2031	1.02	1.01	1.00	0.99	0.98	5.01
SHT20643	Arnish to Balallan 132 kV second Single Circuit	31 March 2031	1.69	1.67	1.66	1.64	1.62	8.28
SHT20281 A	Salamander Tee /Salamander Offshore Windfarm Connection	31 March 2031	1.44	1.43	1.42	1.40	1.39	7.08
SHT20691	Greens 400kV Sync Comp	31 March 2031	2.74	2.71	2.68	2.65	2.63	13.40

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SHT20692	Coachford 400kV Sync Comp	31 March 2031	3.03	3.00	2.97	2.94	2.91	14.84
SHT20693	Banniskirk 400kV Sync Comp	31 March 2031	2.84	2.81	2.78	2.75	2.72	13.90
SHT20694	Carnaig 400kV Sync Comp	31 March 2031	2.89	2.86	2.83	2.80	2.78	14.16
SHT20627	0	31 March 2031	0.63	0.62	0.62	0.61	0.60	3.08
SHT20628	0	31 March 2031	3.65	3.61	3.57	3.54	3.50	17.88
tCSNP2	Longside - Peterhead 400kV upgrade	31 March 2031	0.90	0.89	0.88	0.87	0.86	4.39
tCSNP2	Dounreay - Banniskirk 400kV Reinforcement	31 March 2031	4.66	4.61	4.57	4.52	4.48	22.84
tCSNP2	Blackhillock - Cairnford - Kintore 400kV Upgrade	31 March 2031	5.96	5.90	5.84	5.78	5.73	29.21
tCSNP2	Peterhead - Persley - Kintore 400kV Upgrade	31 March 2031	6.52	6.45	6.39	6.32	6.26	31.94
tCSNP2	HNDFUE HVDC Project. Shetland to Aberdeenshire 2GW HVDC link	31 March 2031	20.80	20.59	20.39	20.18	19.98	101.94
<u>SHT20163</u>	<u>Energy Isles (Kergord) Windfarm Connection</u>	<u>31 March 2031</u>	<u>0.181</u>	<u>2.472</u>	<u>1.314</u>	<u>0.000</u>	<u>0.000</u>	<u>3.967</u>
<u>SHT20687</u> <u>SHT20687 A</u>	<u>Knocknagael & Farigaig area voltage management (Shunt Reactor/STATCO M)</u>	<u>31 March 2031</u>	<u>0.640</u>	<u>1.870</u>	<u>8.400</u>	<u>5.045</u>	<u>0.000</u>	<u>15.955</u>

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<u>SHT20070</u> <u>3</u> <u>SHT20115</u> <u>SHT20114</u>	<u>PT001164 - Loch</u> <u>na Cathrach PSH</u>	<u>31</u> <u>March</u> <u>2031</u>	<u>11.804</u>	<u>1.152</u>	<u>0.000</u>	<u>0.000</u>	<u>0.000</u>	<u>12.956</u>
<u>SHT20081</u> <u>SHT20069</u> <u>9</u>	<u>Shetland On-</u> <u>Island</u> <u>Infrastructure</u>	<u>31</u> <u>March</u> <u>2031</u>	<u>9.432</u>	<u>65.016</u>	<u>7.014</u>	<u>0.000</u>	<u>0.000</u>	<u>81.462</u>

Appendix 4. Privacy policy

Personal data

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

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

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

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

2. Why we are collecting your personal data

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

3. Our legal basis for processing your personal data

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

4. With whom we will be sharing your personal data

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

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

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

6. Your rights

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

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas (Note that this cannot be claimed if using Survey Monkey for the consultation as their servers are in the US. In that case use “the Data you provide directly will be stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in term of data protection will not be compromised by this”.

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system. (If using a third party system such as Survey Monkey to gather the data, you will need to state clearly at which point the data will be moved from there to our internal systems.)

10. More information For more information on how Ofgem processes your data, click on the link to our “[ofgem privacy promise](#)”.