

Consultation

RIIO-ET3 Load Re-opener: May 2026 submission window Draft Determinations – Major Projects ODI-F Annex

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Team:	ET Investment Determinations
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Email:	ReopenerConsultations@ofgem.gov.uk
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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, as governed by Special Condition 3.18 (Load Re-opener and Price Control Deliverable (LR_t) of the electricity transmission licence).

This document sets out our minded-to positions on the application of the Major Projects ODI-F to these submissions. For each project we propose to apply the incentive to, we have included our assessment and justification for our decision.

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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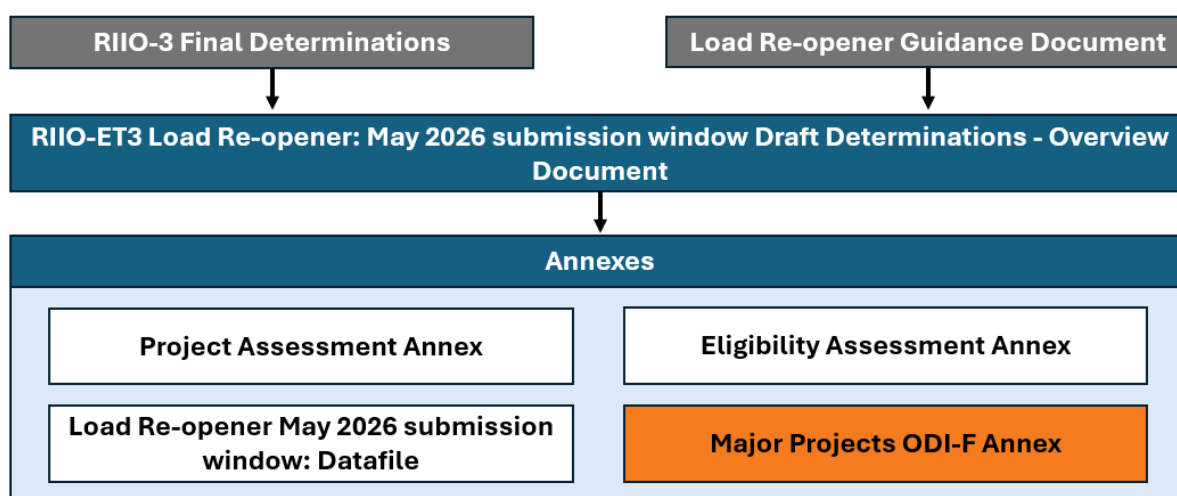
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1. Introduction

- 1.1 This document is one of the annexes published alongside the RIIO-ET3 Load Re-opener May 2026 Draft Determinations (DDs). It focuses on decisions regarding the application of the Major Projects ODI-F¹ (MP ODI-F).
- 1.2 Please refer to the RIIO-ET3 Load Re-opener May 2026 Draft Determinations: Overview Document (as set out in Figure 1 below) for general information on:
- our consultation approach, stages, and how to respond; and
 - the Load Re-opener regulatory processes and assessment approach.

Figure 1: Navigating our Draft Determinations



- 1.3 The MP ODI-F was introduced in RIIO-ET3 to incentivise the timely delivery of strategically important projects. On projects where the MP ODI-F applies, ETOs are financially rewarded where they deliver the project on-time or early, and penalised where they deliver late.
- 1.4 Electricity Transmission (ET) projects submitted through the Load Re-opener can be subject to the MP ODI-F if they meet the following criteria: provide consumer benefit, are strategically important, and practically whether we have, or are likely to obtain, the necessary inputs for the ODI-F.
- 1.5 The key inputs to the MP ODI-F are:

¹ An ODI-F is a financial output delivery incentive. The Major Projects output delivery incentive is a RIIO-ET3 incentive in place to incentivise the timely delivery of significant new infrastructure projects through aligning ETOs' financial interests with consumers' interests. ETOs can receive financial rewards for the on-time or early delivery of projects. Financial penalties will apply to ETOs if projects are delivered late.

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- Optimal Delivery Date (ODD) – developed independently by the National Energy System Operator (NESO) and reflects an assessment of the date on which delivery of the project would bring the most benefit for the consumer. An ODD is not a requirement for this incentive, but where one has been developed by NESO, it will be used to calibrate the incentive.
- P50 Delivery Date – an estimate of the date by which a given project has a 50% chance of being delivered, determined using statistical methods and project-specific factors. When setting the incentive for a project we will use the P50 Delivery Date as estimated at the time that the project is entered into the delivery incentive and in accordance with the requirements set out in our RIIO-ET3 Final Determinations.

These inputs are used to determine the Target Delivery Date (TDD) for the incentive.

- 1.6 Projects can be assessed against the MP ODI-F criteria at any of the Assessment Stages of the re-opener - Eligibility Assessment, Needs Case Assessment or Project Assessment.
- 1.7 At Eligibility Assessment Stage or Needs Case Assessment Stage we may propose a minded-to position to apply the MP ODI-F which means that the information we have now indicates that an incentive will be beneficial, but we need more information before making a final decision on its application and design. For projects where we are minded-to apply the incentive, we will propose a final decision on its application and the design at Project Assessment Stage.
- 1.8 For projects where we have indicated that we do not intend to apply the MP ODI-F at this stage, we may propose a minded-to apply position at a later Assessment Stage.
- 1.9 At any Assessment Stage we may propose to apply the MP ODI-F, which means we have evidence that the MP ODI-F will be beneficial, and we have the information to set the incentive design. This will be subject to consultation.

What are we consulting on?

- 1.10 This document sets out our minded-to positions and proposed decisions in relation to applications received under the Load Re-opener in the May 2026 window from NGET, SHET and SPT.
- 1.11 For 11 projects, we have proposed a minded-to position to apply the MP ODI-F. This reflects our assessment of the applications, including our views on how the applications have met the MP ODI-F eligibility criteria. We do not have the information needed at this stage to consult on final decisions to apply the MP ODI-F, or propose project-specific designs for the incentive. For these projects, final

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decision on the application of the MP ODI-F will be taken at the Project Assessment stage as part of a future Load Re-opener window.

- 1.12 There is one project where we are consulting on the decision not to apply the MP ODI-F.
- 1.13 For all other projects submitted in the May 2026 window, we do not consider that they meet the criteria for the application of the MP ODI-F. We propose to not apply the incentive at this stage. If, at a future Assessment Stage, we are minded-to apply or propose a decision to apply the MP ODI-F for these projects, we will consult again at that stage.
- 1.14 We would welcome views on:
- For the 11 projects where we have indicated that we are minded-to apply the MP ODI-F, whether stakeholders agree with this assessment?
 - Whether there are any additional projects where stakeholders consider the MP ODI-F should be applied?
 - For the one project where we have proposed to not apply the MP ODI-F, whether stakeholders agree with this assessment?

Submissions overview

- 1.15 The ETOs submitted their re-opener applications between 5 – 8 May 2026 under Special Condition (SpC) 3.18 Load Re-opener and Price Control Deliverable (LR_t). We have assessed their eligibility for the Major Projects ODI-F under SpC 4.8.
- 1.16 We received 28 Eligibility Letter submissions and two Project Assessment submissions in the May 2026 window.
- 1.17 One of these Project Assessment submissions, NGET's Woolavington project, was not considered for the MP ODI-F at this stage. NGET previously submitted the Woolavington project for Final Needs Case (FNC) approval under the ET2 Large Onshore Transmission Investment (LOTI) mechanism. It will be eligible for funding through the Load Re-opener once the FNC decision has been published. We will publish a consultation on the FNC shortly and will consult on full project funding under the Load Re-opener as soon as possible after the FNC decision is published later this year. We will assess suitability of the project for the MP ODI-F at this later stage.
- 1.18 We have considered all other submissions for the application of the MP ODI-F.

Related publications

- 1.19 This document is intended to be read alongside:

Consultation: RIIO-ET3 Load Re-opener May 2026 Draft Determinations: Major Projects ODI-F annex

- Major Project ODI-F Governance Document: [Electricity transmission price control 2026 to 2031 \(RIIO-ET3\) guidance | Ofgem](#)
- 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 Document: [Electricity transmission price control 2026 to 2031 \(RIIO-ET3\) 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](#)

Consultation stages

1.20 This consultation will run for 28 days and will close on 24 September. We will endeavour to review responses before finalising and publishing our decision in November 2026. The key stages are:

- **Stage 1:** Consultation open: 27 August 2026.
- **Stage 2:** Consultation closes (awaiting decision). Deadline for responses: 24 September 2026
- **Stage 3:** Responses reviewed and published: with decision
- **Stage 4:** Consultation outcome (decision or policy statement).

How to respond

We want to hear from anyone interested in this consultation. Please send your response to the person or team named on the front page of this document.

We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website.

Your response, data, and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information. For example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations, or where you give us explicit

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permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the United Kingdom's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 2.

If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

How to track the progress of a consultation

1. Find the web page for the call for input you would like to receive updates on.
2. Click 'Get emails about this page', enter your email address and click 'Submit'.
3. You will receive an email to notify you when it has changed status.

A consultation has three stages: 'Open', 'Closed (awaiting decision)', and 'Closed (with decision)'.

2. Our assessment process

Summary of assessments

- 2.1 We use the information within the ETOs applications to the Load Re-opener to assess a projects suitability for the application of the MP ODI-F.
- 2.2 In the May 2026 Load Re-opener window, we assessed 29 submissions for the MP ODI-F: 1 Project Assessment and 28 Eligibility Assessments. These projects are summarised in Table MP1 below, along with our proposed decision on application of the MP ODI-F.
- 2.3 NGET's ETRE submission has been listed as NA as we consider it to be ineligible for the Load Re-opener. More information on this proposal can be found in the Eligibility Assessment Annex.

Table MP1: Summary of the May 2026 Load Re-opener submissions, and proposed decision on MP ODI-F

Project Name	ETO	Assessment Stage	Submitted forecast project cost (£m)	Proposed decision on MP ODI-F
Aberthaw – Site Strategy	NGET	Eligibility	530.300	Do not apply at this stage
Banwen (Rhigos B)	NGET	Eligibility	196.500	Do not apply at this stage
Berkswell	NGET	Eligibility	76.600	Do not apply at this stage
Blyth 400kV Site Strategy	NGET	Eligibility	400.900	Minded-to apply at a future stage
Bodelwyddan 400kV Extension	NGET	Eligibility	194.700	Minded-to apply at a future stage
Bolney 400kV Site Strategy	NGET	Eligibility	102.600	Do not apply at this stage
Bridgend	NGET	Eligibility	319.500	Minded-to apply at a future stage

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ODI-F annex

Project Name	ETO	Assessment Stage	Submitted forecast project cost (£m)	Proposed decision on MP ODI-F
East Claydon – Enderby – Patford Bridge 1 and 2 OHL	NETG	Eligibility	167.800	Minded-to apply at a future stage
ETRE	NETG	Eligibility	40.670	NA
Farmoor	NETG	Eligibility	136.200	Do not apply at this stage
Feckenham – Hams Hall OHL	NETG	Eligibility	54.300	Minded-to apply at a future stage
Feckenham – Ironbridge OHL	NETG	Eligibility	79.700	Minded-to apply at a future stage
Imperial Park 400/132kV Upgrade	NETG	Eligibility	60.450	Do not apply at this stage
Ince SGT Extension	NETG	Eligibility	61.520	Do not apply at this stage
Keadby 132kV	NETG	Eligibility	53.690	Do not apply at this stage
Kingsnorth 400kV Extension	NETG	Eligibility	96.700	Do not apply at this stage
Laleham 132kV Extension	NETG	Eligibility	217.400	Do not apply at this stage
Lower Frankton 400kV AIS Substation	NETG	Eligibility	347.700	Do not apply at this stage
North West London	NETG	Eligibility	400.500	Minded-to apply at a future stage
SCRE (COTT4 – STAY4) and WRRE (WBUR4 – RATS4) OHL	NETG	Eligibility	157.800	Minded-to apply at a future stage

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Project Name	ETO	Assessment Stage	Submitted forecast project cost (£m)	Proposed decision on MP ODI-F
Tees Dock Substation	NGET	Eligibility	657.500	Minded-to apply at a future stage
Tilbury 275kV Rebuild - RIIO T3 Holistic Site Strategy	NGET	Eligibility	231.770	Minded-to apply at a future stage
Warley 275kV Substation Replacement	NGET	Eligibility	389.090	Minded-to apply at a future stage
Willington 132kV Rebuild	NGET	Eligibility	43.200	Do not apply at this stage
VSRE XH & XJ Routes 400kV Major Refurb	SPT	Project Assessment	158.792	Do not apply
Energy Isles (Kergord) Windfarm Connection	SHET	Eligibility	52.369	Do not apply at this stage
Knocknagael Farigaig HVP	SHET	Eligibility	215.392	Do not apply at this stage
Loch Na Cathrach Cluster	SHET	Eligibility	162.618	Do not apply at this stage
Shetland On-Island Infrastructure	SHET	Eligibility	1160.995	Do not apply at this stage

- 2.4 In reaching our minded-to position, we assessed whether these projects met the eligibility criteria set out in the [Major Projects ODI-F Governance Document](#). We considered: consumer benefit, strategic importance, and practicalities such as whether we have, or are likely to obtain, the necessary inputs to calibrate the incentive. We qualitatively assessed each project against each of these criteria based on information we have about them at this stage, with no single criterion necessarily being determinative. Ultimately, we will judge whether applying an incentive is necessary to suitably protect consumers from late delivery, and/or to additionally incentivise the ETO to deliver on time or early.

- 2.5 Where we have proposed a minded-to position to apply the MP ODI-F, this is indicative and may change, either to a proposed decision to apply or potentially not apply, as project information develops through Needs Case Assessment and Project Assessment in future re-opener windows.
- 2.6 When making the final decision on the application of the MP ODI-F, we will consult on the decision and the design of the incentive.

Our minded-to position for projects at Eligibility Assessment stage

- 2.7 Following our assessment of the projects in Table MP1 against the eligibility criteria set out in the Major Projects ODI-F Governance Document, we have decided that:

- Blyth 400kV Site Strategy,
- Bodelwyddan 400kV Extension,
- Bridgend,
- East Claydon – Enderby - Patford Bridge 1 and 2 OHL,
- Feckenham – Hams Hall OHL,
- Feckenham – Ironbridge OHL,
- North West London,
- SCRE and WRRE OHL,
- Tees Dock Substation,
- Tilbury 275kV Rebuild, and
- Warley 275kV Substation Replacement,

meet the eligibility criteria for the MP ODI-F, and our minded-to position is that these projects should have the MP ODI-F applied.

- 2.8 For this assessment we used the following criteria:

- Strategic importance: we assess whether the project is NESO-recommended for delivery, or is part of government or legislative targets?
- Consumer benefit: is there consumer benefit in timely or accelerated delivery of this project, for example if a project delivers material constraint relief, or conversely if there will be consumer detriment, such as network constraint costs, associated with late delivery?
- Other considerations were made such as whether the project enables timely delivery of NESO Gate 2 connection offers?
- Practicalities: do we have, or will be able to obtain, the inputs required for the MP ODI-F (eg a P50 Delivery Date)?

Practicalities

- 2.9 For all projects considered eligible for the MP ODI-F, we reasonably expect to be able to obtain the necessary inputs to inform the MP ODI-F, including a P50 date, a NESO provided or verified ODD, and a supporting delivery plan. Where assumptions or inputs remain subject to change, we will keep these under review as part of the subsequent Assessment Stages.
- 2.10 In cases where the MP ODI-F would otherwise be appropriate but cannot be applied due to the unavailability of necessary inputs, we may consider whether the underlying risks or uncertainties can be addressed through our Project Assessment decisions. Any such considerations would be assessed taking account of the specific circumstances of the project and the evidence available.
- 2.11 When we assessed the eligible projects submitted in the May 2026 Load Re-opener window against these ‘Practicalities’ criteria, we did not have the inputs required to calibrate the incentive at this stage. We have therefore proposed minded-to positions.
- 2.12 After this consultation has concluded, we will review responses and publish our final minded-to positions. We do not expect to make a proposal on the specific parameters and finalised design for the incentive until Project Assessment stage for each project.
- 2.13 For all projects listed below, we expect the ETOs to provide a P50 delivery date developed in accordance with the methodology approved by the authority at their next Assessment Stage. Where NESO has developed or verified an ODD, we will use this to calibrate the incentive.

NGET Blyth 400kV Site Strategy

Strategic importance

- 2.14 We considered whether Blyth 400kV is strategically important by assessing the wider system need of delivering a new 400kV Gas-Insulated Switchgear (GIS) substation. We consider that Blyth 400kV is strategically important as it is needed to connect a strategic demand customer, which will connect 1.45GW of offshore wind, and support Clean Power 2030 (CP2030). Furthermore, the connection of a data centre campus supports government’s ambition of developing the North East AI Growth Zone. On this basis, we are minded-to conclude that the strategic importance criterion is met.

Consumer benefit

2.15 We consider that there is consumer benefit in timely or accelerated delivery of Blyth 400kV or conversely consumer detriment from late delivery. The connection of the wind farm facilitates a greater amount of renewable power connected to the transmission network. In turn, consumers will benefit from greater energy security and a reduced risk of network access constraint payments. Likewise, the sooner connection of the data centre campus would result in a sooner realisation of the socio-economic benefits associated with the investment. The application indicates that timely delivery would enable contracted strategic generation and demand connections to proceed, relative to later delivery.

NGET Bodelwyddan 400kV Extension

Strategic importance

2.16 We considered whether Bodelwyddan is strategically important by assessing whether delivering an extension to the existing Bodelwyddan substation contributes to government or legislative targets. We have concluded that it is strategically important based on two of the six generation customer connections connecting 2.6GW of offshore wind, both of which are critical to CP2030 ambitions. This is in alignment with government's ambition to connect 43-50GW of offshore wind by 2030. On this basis, we are minded to conclude that the strategic importance criterion is met.

Consumer benefit

2.17 We considered whether there is consumer benefit in timely or accelerated delivery of Bodelwyddan or conversely consumer detriment from late delivery. We consider that Bodelwyddan is likely to deliver consumer benefit if delivered on time (or earlier). This view is based on the consumer benefit of connecting critical CP2030 offshore wind to the transmission network. In particular, the application indicates that late delivery would result in major offshore wind and interconnector customers being unable to connect to the transmission network in time to meet CP2030 ambitions. This would increase the risk of high curtailment which would result in consumers paying unnecessary constraint costs. We consider the avoidance of constraint costs as a consumer benefit unlocked by the timely delivery of Bodelwyddan, relative to later delivery.

Other considerations

2.18 In addition to the eligibility criteria above, we have considered whether Bodelwyddan is expected to enable the timely connection of relevant projects. In our assessment, we found that Bodelwyddan does enable the timely connection

of relevant projects, as four of the six customer connections hold Gate 2 offers from NESO. This indicates that the customer projects have a high technical readiness and are in alignment with national carbon and clean power targets.

NGET Bridgend

Strategic importance

2.19 We considered whether Bridgend is strategically important by assessing its role in facilitating demand and generation connections and whether the project provided wider system benefits through the creation of a new 400kV compliant connection node in South Wales. We have concluded that it is strategically important based on evidence that the project would accommodate up to 860MW of contracted strategic demand, including data centres, and provide capability for around 1.5GW of offshore wind integration. This includes alignment with wider government priorities: strategic demand infrastructure, net zero, and future offshore wind development. On this basis, we are minded to conclude that the strategic importance criterion is met.

Consumer benefit

2.20 We considered whether there is consumer benefit in timely or accelerated delivery of Bridgend or conversely consumer detriment from late delivery. We consider that Bridgend is likely to deliver consumer benefit if delivered on time or earlier. This view is based on the project unlocking new demand connections, enabling generation connections, supporting wider economic activity associated with those connections, and reducing the risk that network access constraints delay the realisation of those benefits. In particular, the application indicates that timely delivery would enable contracted strategic demand and future generation connections to proceed, relative to later delivery.

Other considerations

2.21 We have considered that Bridgend appears capable of meeting the strategic importance and consumer benefit criteria because it would create a new 400kV connection node in South Wales, accommodate up to 860MW of contracted strategic demand, and provide capability for around 1.5GW of offshore wind integration. The evidence shows that the project is at an early stage of maturity, with GIS emerging as the direction of travel. However, this option is not the confirmed preferred solution, and delivery dates are dependent on option choice. We therefore consider that Bridgend's alignment with the MP ODI-F application criteria is conditional on further evidence at the next Assessment Stage, including confirmed scope, delivery assumptions, and a credible TDD.

NGET East Claydon – Enderby - Patford Bridge 1 and 2 OHL

Strategic importance

2.22 We considered whether East Claydon – Enderby - Patford Bridge OHL is strategically important by assessing the wider system benefit of increasing the B8 Boundary capacity by 500MW and the B9 Boundary by an additional 250MW. We have concluded that it is strategically important based on NESO's signalling in the NOA7 Refresh and its classification as a CP2030 project. This is in alignment with government's national priorities of delivering net zero infrastructure and energy security through a resilient and reliable transmission network. On this basis, we are minded-to conclude that the strategic importance criterion is met.

Consumer benefit

2.23 We considered whether there is consumer benefit in timely or accelerated delivery of East Claydon – Enderby - Patford Bridge OHL or conversely consumer detriment from late delivery. We consider that East Claydon – Enderby - Patford Bridge OHL is likely to deliver consumer benefit if delivered on time (or earlier). This view is based on the expected outcome of increased capacity on the B8 and B9 boundary, which separate the Northern generation zones and the Southern demand centres. The increase in boundary capacity will see consumers benefit from an increased ability to connect renewable generation sources, which should result in a reduction in curtailment of renewable generation sources, ultimately leading to an increase in energy security and an avoidance of constraint payments. This indicates that timely delivery would be in consumers' benefit, relative to later delivery.

NGET Feckenham - Hams Hall OHL

Strategic importance

2.24 We considered whether Feckenham - Hams Halls OHL is strategically important by assessing the wider system benefit of increasing the B8 boundary capacity by 1050MW and the B9 boundary by 950MW. We have concluded that it is strategically important based on NESO signalling the need for an increase in the B8 and B9 boundary capacity in the NOA7 Refresh 2021/22 and the Transitional Centralised Strategic Network Plan (tCSNP). This project will contribute towards meeting the transfer power requirements of almost 31GW and 26GW across the B8 and B9 boundaries by 2035, addressing existing overloading issues in the high north to slow flow conditions. This is in alignment with CP2030 ambitions, which contribute to government's national priorities. On this basis, we are minded-to conclude that the strategic importance criterion is met.

Consumer benefit

2.25 We considered whether there is consumer benefit in timely or accelerated delivery of Feckenham - Hams Halls OHL, or conversely consumer detriment from late delivery. We consider that Feckenham - Hams Halls OHL is likely to deliver consumer benefit if delivered on time (or earlier). This view is based on the existing thermal limitations of the existing overhead line (OHL) infrastructure on the Feckenham – Hams Hall circuit, and the overloading issues typically driven by interconnector exports. Consumers will benefit from a smoother connection of new generation sources, as well as greater network reliability and stability by preventing overloads during fault conditions. This indicates that timely delivery would avoid consumer detriment, relative to later delivery.

Other considerations

2.26 In addition to the eligibility criteria above, we have considered that NESO has provided an ODD of 2033 for Feckenham – Hams Hall OHL. This indicates that we will likely have the information required to suitably calibrate the MP ODI-F. At Project Assessment stage, we expect NGET to provide a P50 Delivery Date which will be used to determine incentive parameters.

NGET Feckenham – Ironbridge OHL

Strategic importance

2.27 We considered whether Feckenham – Ironbridge OHL is strategically important by assessing the wider system benefit of delivering an increase to the SC1 boundary capability by approximately 700MW, and an increase to the thermal capacity on the Feckenham – Ironbridge circuit from 2010MVA to at least a winter post fault rating of 3100MVA. We have concluded that it is strategically important based on NESO’s essential signal for this project as part of the Holistic Network Design (HND) and confirming the project as a necessary part of the tCSNP2 Plan in the Beyond 2030 Report. This is in alignment with CP2030 ambitions, which contribute to government’s national priorities. On this basis, we are minded-to conclude that the strategic importance criterion is met.

Consumer benefit

2.28 We considered whether there is consumer benefit in timely or accelerated delivery of Feckenham – Ironbridge OHL or conversely consumer detriment from late delivery. We consider that Feckenham – Ironbridge OHL is likely to deliver consumer benefit if delivered on time (or earlier). This view is based on the existing thermal limitations of the existing Feckenham – Ironbridge OHL circuit, and the current overloading issues, typically driven by interconnector exports. Feckenham

– Ironbridge OHL will deliver an increase of power transfer across the SCR 1Rev boundary and increase capacity in the high north to south flow conditions. As a result, consumers will benefit from an increase in network resilience, a reduction in constraints caused by the current bottlenecks on the transmission network, and a greater ability to connect renewables, increasing energy security. This indicates that timely delivery would avoid consumer detriment, relative to later delivery.

Other considerations

2.29 In addition to the eligibility criteria above, we have considered that NESO has provided an ODD of 2030 for Feckenham – Ironbridge OHL. This indicates that we will likely have the information required to suitably calibrate the MP ODI-F. At Project Assessment stage, we expect NGET to provide a P50 Delivery Date which will be used to determine incentive parameters.

NGET North West London

Strategic importance

2.30 We considered whether North West London reinforcement is strategically important by assessing its role in reinforcing the import capability into the London region, improving power flows on the Sundon–Elstree circuits, and supporting boundary upgrades across LE1 and B14. We have concluded that it is strategically important because the project aims to deliver two NESO schemes identified as HND Essential Options: ESC1, a second 400kV circuit between Elstree and St John’s Wood, and SER4, reconductoring the Sundon–Elstree route. This project is aligned with CP2030 ambitions through increased offshore wind integration, regional demand growth, and the reduction of forecast constraint costs. On this basis, we are minded-to conclude that the strategic importance criterion is met.

Consumer benefit

2.31 We considered whether there is consumer benefit in timely or accelerated delivery of North West London or conversely consumer detriment from late delivery. We consider that North West London project is likely to deliver wider consumer benefit if delivered on time (or earlier). This view is based on the project increasing London import capability, improving network operability, supporting wider boundary capability, and avoiding consumer detriment from delayed reinforcement. Our assessment indicates that timely delivery would help avoid significant constraint costs relative to later delivery.

Other considerations

2.32 We consider that North West London appears capable of meeting the MP ODI-F eligibility criteria if it is treated as a single integrated programme, given its strategic role in London's import capability, CP2030 delivery, constraint-cost reduction, and delivery of the full ESC1 and SER4 capability. However, the case is more conditional if ESC1 and SER4 are treated as separate Load Re-opener schemes or if key delivery risks are outside NGET's control. On this basis, we are minded-to accept North West London subject to conditions on output definition, dependency treatment, and interface management.

NGET SCRE (COTT4-STAY4) and WRRE (WBUR4-RATS4) OHL

Strategic importance

2.33 We considered whether SCRE and WRRE OHL is strategically important by assessing the wider system benefit of uprating SCRE and WRRE 400kV single circuits. We have concluded that it is strategically important based on evidence that the project would deliver an uplift of 1075MW to the B8 Boundary and an uplift of 1739MW to the B7a Boundary, to relieve the network constraints. The project is also a critical enabler of the Accelerated Strategic Transmission Investment (ASTI) EDEU project, which in turn facilitates two further ASTI projects: EDN2 and CGNC. We consider that delivery of SCRE and WRRE will relieve the current pressure on the network caused by large volumes of electricity generation. NESO has identified this project as essential under the HND and is designated as CP2030. This is in alignment with the government's national priorities of delivering net zero infrastructure and greater energy security for consumers. On this basis, we are minded-to conclude that the strategic importance criterion is met.

Consumer benefit

2.34 We considered whether there is consumer benefit in timely or accelerated delivery of SCRE and WRRE OHL or conversely consumer detriment from late delivery. We consider SCRE and WRRE OHL is likely to deliver consumer benefit if delivered on time (or earlier). This view is based on the relief of forecast north-south power flow constraints, as well as enabling the delivery of critical ASTI projects, which SCRE and WRRE OHL will unlock. In contrast, late delivery of SCRE and WRRE OHL would create system constraints and jeopardise the EDEU ASTI ODI delivery date. Consumers would face the detriment of constraint costs should the delivery of SCRE and WRRE OHL be delayed.

NGET Tees Dock Substation

Strategic importance

2.35 We considered whether Tees Dock Substation is strategically important by assessing the wider system benefit of delivering a new 400kV double busbar GIS substation. We have concluded that the proposed project is strategically important based on the evidence that the project will accommodate 1000MW of contracted Battery Energy Storage System (BESS). This will provide additional flexible capability on the transmission network to support the decarbonisation of the industry, as well as future network needs. Furthermore, the project will accommodate 1400MW of strategic demand, targeted to support AI Growth Zone ambitions in the region. This includes alignment with government priorities to build a resilient and reliable transmission network, to increase national energy security, as well as developing strategic demand infrastructure and AI Growth Zones. On this basis, we are minded to conclude that the strategic importance criterion is met.

Consumer benefit

2.36 We considered whether there is consumer benefit in timely or accelerated delivery of Tees Dock Substation or conversely consumer detriment from late delivery. We consider that Tees Dock Substation is likely to deliver consumer benefit if delivered on time (or earlier). This view is based on the anticipated growth in demand in the next 20 years in the North East, with demand estimated to increase by 2.5-3.2GW in the future. Consumers will benefit from the increased reliability and security of supply associated with the network reinforcements enabled by the Tees Dock Substation. Likewise, the application indicates that timely delivery would accelerate the realisation of the socio-economic benefits of connecting the data centres, relative to later delivery.

Other considerations

2.37 In addition to the eligibility criteria above, we have considered whether Tees Dock Substation is expected to enable the timely connection of relevant projects. In our assessment, we found that Tees Dock Substation does enable the timely connection of relevant projects, as both of the demand connection customers hold NESO confirmed Gate 2 offers. Timely delivery of Tees Dock Substation will enable the connection of projects which have a high technical readiness and are in alignment with national carbon and clean power targets.

NGET Tilbury 275kV Rebuild - RIIO T3 Holistic Site Strategy

Strategic importance

2.38 We considered whether Tilbury is strategically important because of its role in supporting customer connections, tCSNP2 boundary uplift, NESO operability needs, and future network capacity. We have concluded that because of its links to the TWNC tCSNP2 project and its role in supporting LE1 boundary uplift, including the repositioning of Warley 1 and 2 feeder circuits within the Tilbury substations, the project is of strategic importance. On this basis, we are minded to conclude that the strategic importance criterion is met, provided further evidence confirms the project's role in enabling tCSNP2/TWNC outputs rather than primarily addressing asset health or site rationalisation.

Consumer benefit

2.39 We considered whether there is consumer benefit in timely or accelerated delivery of Tilbury or conversely consumer detriment from late delivery. We consider that Tilbury is likely to deliver consumer benefit if delivered on time (or earlier). In particular, the application indicates that timely delivery would support wider contracted connections and tCSNP2-related network capability relative to later delivery.

Other considerations

2.40 No preferred technical option has been selected for Tilbury; therefore, no P50 delivery date is available, and the project's rationale could weaken if it is ultimately driven mainly by asset replacement, site rationalisation, or civil condition issues. We would therefore need further evidence on the preferred option, defined scope, delivery plan, TDD assumptions, final cost estimate, and the specific strategic network outputs to be incentivised before confirming.

NGET Warley 275kV Substation Replacement

Strategic importance

2.41 We considered whether Warley is strategically important by assessing whether there are wider system benefits through the creation of a new 400kV GIS busbar substation. We have concluded that it is strategically important based on NESO's identification of the need to boost the transmission network from 275kV to 400kV via the TWNC project. This will unlock power flows west-east and east-west and support the uptake of renewable, nuclear, and interconnector sources of energy. This contributes to wider government national priorities of decreasing dependency on fossil fuels and increasing energy security by enabling the

transition to clean energy sources. On this basis, we are minded-to conclude that the strategic importance criterion is met.

Consumer benefit

2.42 We considered whether there is consumer benefit in timely or accelerated delivery of Warley, or conversely consumer detriment from late delivery. We consider that Warley is likely to deliver consumer benefit if delivered on time (or earlier). This view is based on the increased circuit capacity in the high demand North London region, as well as the power exports along the South Coast, that Warley will deliver. Consumers will benefit from the connection of renewable energy to provide greater energy security, as well as the economic benefits associated with connecting data centres. In particular, the application indicates that timely delivery would reduce system costs and accelerate the realisation of benefits relative to later delivery.

Other considerations

2.43 In addition to the eligibility criteria above, we have considered whether Warley is expected to enable the timely connection of relevant projects. In our assessment, we found that Warley does enable the timely connection of relevant projects, as four of the ten connection customers hold Gate 2 offers from NESO, indicating that they have a high technical readiness and are in alignment with national carbon and clean power targets.

Consultation Question

MPQ1. For each project where we are minded-to apply the Major Projects ODI-F, do you agree with our proposal?

Our proposed decision for projects at Project Assessment stage

SPT VSRE XH & XJ Routes 400kV Major Refurb

- 2.44 Following our assessment of the projects in Table MP1 against the eligibility criteria set out in the Major Projects ODI-F Governance Document, we propose that VSRE XH & XJ Routes 400kV Major Refurb does not meet the eligibility criteria for the MP ODI-F. We propose not to apply the MP ODI-F to this project.
- 2.45 While the VSRE project is a significant investment, it is primarily an asset replacement and refurbishment project rather than a strategic network expansion or reinforcement project. We therefore consider that it falls outside the primary policy intent of the incentive, which is to encourage timely delivery of projects where delays could lead to significant consumer detriment.
- 2.46 In reaching this view, we note that the project's need has already been established through existing planning and approval processes, and there is currently limited evidence that delayed delivery would result in material impacts on network capability, security of supply, connections, or other strategic system outcomes.
- 2.47 We recognise that the project is substantial in value and may have wider system importance. We would therefore reconsider this position if stakeholders provide evidence demonstrating that delayed delivery would result in clear, material and quantifiable consumer harm or significant strategic system impacts beyond those normally associated with asset health projects.

Consultation Question

MPQ2. For the VSRE XH & XJ Routes 400kV Major Refurb project, do you agree that this project does not meet the criteria for the Major Projects ODI-F, and that the ODI-F should not be applied?

Projects which do not meet the criteria for application of the ODI-F at this stage

- 2.48 Following our assessment of the projects in Table MP1 against the eligibility criteria set out in the Major Projects ODI-F Governance Document, we consider that the following projects do not meet the criteria for the application of the MP ODI-F at this stage:
- NGET Aberthaw – Site Strategy
 - NGET Banwen (Rhigos B)

Consultation: RIIO-ET3 Load Re-opener May 2026 Draft Determinations: Major Projects ODI-F annex

- NGET Berkswell
- NGET Bolney 400kV Site Strategy
- NGET Farmoor
- NGET Imperial Park 400/132kV Upgrade
- NGET Ince SGET Extension
- NGET Keadby 132kV
- NGET Kingsnorth 400kV Extension
- NGET Laleham 132kV Extension
- NGET Lower Frankton 400kV AIS Substation
- NGET Willington 132kV Rebuild – Connection Assets
- SHET Energy Isles (Kergord) Windfarm Connection
- SHET Knocknagael Farigaig HVP
- SHET Loch Na Cathrach Cluster
- SHET Shetland On-Island Infrastructure

2.49 For these projects we consider that there is not a significant strategic driver for delivery, and there is not a consumer benefit in incentivising a timely or accelerated delivery.

2.50 We may revisit this position in future Assessment Stages for these projects as we receive more information.

Consultation Question

MPQ3. Do you consider any projects we have proposed not to apply the Major Projects ODI-F at this stage should be applicable?

3. Conclusions and next steps

- 3.1 We welcome your responses to this consultation, both on the proposals set out in this document and on the specific questions included in Chapter 2. Please send your response to ReopenerConsultations@ofgem.gov.uk. The deadline for your response is 24 September 2026.
- 3.2 We will carefully consider all consultation responses and aim to conclude our assessment and publish our final positions and decisions by November 2026, in line with the six-month assessment period set out in the Load Re-opener guidance.
- 3.3 Where we have set a minded-to position, we expect the relevant ETO to provide the necessary information to set the incentive design at the next Assessment Stage for that project.

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. Consultation questions overview

- A1.1 MPQ1. For each project where we are minded-to apply the Major Projects ODI-F, do you agree with our proposal?
- A1.2 MPQ2. For the VSRE XH & XJ Routes 400kV Major Refurb project, do you agree that this project does not meet the criteria for the Major Projects ODI-F, and that the ODI-F should not be applied?
- A1.3 MPQ3. Do you consider any projects we have proposed not to apply the Major Projects ODI-F at this stage should be applicable?

Appendix 2. 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.

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](#)”.