

Decision

Final Determinations: Advanced Procurement Mechanism Re-opener 2026 (RIIO-ET3)

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Ofgem (the office of the Gas and Electricity Markets Authority) has made Final Determinations on the 2026 Advanced Procurement Mechanism (APM) Re-opener applications from National Grid Electricity Transmission Plc (NGET), Scottish Hydro Electric Transmission Plc (SHET), and SP Transmission Plc (SPT) (the electricity Transmission Owners).

We considered all seven responses to our consultation and have decided to:

- increase Bespoke Procurement allowances for all three Transmission Owners (TOs) by approximately £835m without changing the envelope of overall APM allowances; and
- add 'Permanent Modular Substations' as a new, Flexible APM Cost Category, with consequential amendments to the APM Governance Document.

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1. Introduction

Context and related publications

- 1.1 Ofgem consulted on our [Draft Determinations for the Advanced Procurement Mechanism \(APM\) Re-opener](#) on 13 July 2026. That consultation closed on 31 July 2026. The APM was [consulted on and introduced](#) during RIIO-ET2.
- 1.2 These APM Draft and Final Determinations are made in accordance with the Special Condition (SpC) 3.16 of the [Electricity Transmission \(ET\) licence](#), and the [APM Governance Document](#). **Appendix 1** includes a list of relevant defined terms in SpC 1.1 of the ET licence.
- 1.3 Our Final Determinations must be read alongside the following Annexes and the consultation responses:
 - Annex 1 – Direction for NGET
 - Annex 2 – Direction for SHET
 - Annex 3 – Direction for SPT

Decision-making stages

Stage 1 Consultation open: 13 July 2026

Stage 2 Consultation closes (awaiting decision). Deadline for responses: 31 July 2026

Stage 3 Responses reviewed and published: 02 October 2026

Stage 4 Consultation outcome (decision): 02 October 2026

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2. Bespoke Procurement allowances

This section sets out our Final Determinations to increase Bespoke Procurement allowances for all three electricity Transmission Owners (TOs).

What did we consult on?

- 2.1 In our Draft Determinations, we proposed increasing Bespoke Procurement allowances across all three TOs by approximately £850m (2023/2024 prices). This would result in an increase in the overall value of Bespoke Procurement allowances to approximately £1.4bn (2023/2024 prices) across all TOs, from approximately £550m currently.
- 2.2 This increased value of Bespoke Procurement allowance forms part of the overall APM Cap of approximately £4bn across all three TOs. Our Draft Determinations did not propose amending this APM Cap.
- 2.3 We received seven responses to our proposal to increase Bespoke Procurement allowances. The following sections describe how we have considered those responses in reaching our Final Determination in relation to each area requested by the TOs.

Summary of our Final Determinations

Approved Bespoke Procurement allowances

- 2.4 We revise our Draft Determinations and approve approximately £835m (2023/2024 prices) in Bespoke Procurement allowances across the TOs. This represents approximately 20% of the expected contract costs (the cost of all units of Equipment and/or Related Services under the TO's procurement contract).
- 2.5 The decrease from our proposed £850m approval is the result of a correction to the identifying and reporting of customer-funded connection assets, which are currently excluded from APM funding. This error occurred in the TO's responses to our supplementary questions that informed our Draft Determinations which resulted in customer funded asset being incorrectly included in our Draft Determinations.
- 2.6 The approved allowances are to procure the following Equipment and Related Services:
 - Flexible AC Transmission System (FACTS) Equipment
 - Gas Insulated Switchgear (GIS) (incl. Circuit Breakers)
 - GIS Bays 132kV, 275kV and 400kV
 - Busbar (GIB)

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- High-Voltage Direct Current (HVDC)
 - HVDC Cable
 - HVDC Converter
- Wound Plant
 - Shunt Reactor
 - Quad Booster

2.7 This Equipment and Related Services is for use in 22 different projects to be delivered by 2036. Six of these projects are expected to be delivered by 2030. The project expected to be delivered by 2035-2036 requires HVDC equipment and the known procurement lead time for HVDC equipment, as reported by TOs, is currently between six to eight years.

Declined Bespoke Procurement allowances for GIS where the request is premature relative to known procurement lead times

- 2.8 In our Draft Determinations, we proposed declining Bespoke Procurement allowances GIS for four projects on the basis that the projects are not due to energise until 2034 to 2036, GIS procurement lead times (as reported by TOs) are currently up to 36 months, and the ongoing need for the projects remains subject to alignment with the Government's Strategic Spatial Energy Plan for Great Britain (SSEP).
- 2.9 In response, the TO noted current delays in procurement engagement with suppliers and that equipment is required on site in advance of energisation. The TO also noted that procurement in 2026 was needed for early and detailed design, which is an essential part of the consent process and inextricably linked by planning requirements. Planning and consenting is planned for 2029/2030.
- 2.10 The APM is intended to mitigate the risk of project delays arising from supply chain constraints and equipment lead times by enabling earlier procurement of critical assets. The evidence provided by the TO in its consultation response suggests that the principal driver for the *timing* of its APM application in 2026 is the need to support project design, planning and consenting activities by 2029/2030, rather than to address an imminent procurement need driven by GIS lead times.
- 2.11 We currently do not consider that TO procurement (and thus APM use) should be driven by planning and consenting timeframes. We do not agree that TOs are required to have started procurement or placed contracts in order to secure planning consent, and we have seen no evidence to indicate that this is the case. We are concerned that TOs linking procurement and consenting activities would create additional consumer risk of stranded procurement beyond what has otherwise been required on projects to-date.

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- 2.12 We also note our preference that TOs prioritise lower-emissions, Air Insulated Switchgear (AIS) technology where possible, and do not want to encourage earlier than necessary purchases of GIS equipment through the APM.
- 2.13 We therefore do not consider it appropriate to provide Bespoke Procurement allowances at this stage and confirm our decision to decline. Should procurement lead times create a credible risk to project delivery, TOs may submit a future APM Re-opener application supported by updated evidence.

Declined Bespoke Procurement allowances for projects with existing funding in the price control

- 2.14 In our Draft Determinations, we proposed declining Bespoke Procurement allowances for GIS equipment associated with projects that are expected to be funded through the Load Use-It-Or-Lose-It (UIOLI) fund in RIIO-ET3. The Load UIOLI provides funding for lower-materiality load-related projects (£40m or less), including direct construction costs. It is subject to an ex-post assessment against the relevant eligibility, delivery, and cost efficiency criteria.¹ With TOs not subject to ex ante assessments on Load UIOLI projects we did not consider that extending the APM to those projects is necessary – TOs are able to procure for those projects in advance without waiting for allowances to be approved.
- 2.15 TOs disagreed with our reasons for declining. They consider that the APM should provide flexibility to undertake advanced procurement where there is uncertainty over whether a project will remain eligible for the Load UIOLI due to potential future cost increases. Under the TOs' proposed approach, eligible Equipment and Related Services could initially be procured using the APM, with eligibility for the Load UIOLI determined at a later stage, once project scope and costs are more certain. This approach would apply to APM Expenditure on bespoke and flexibly-procured assets.
- 2.16 Having considered these responses, we remain of the view that the licensees' proposed approach is not consistent with the current licence framework and the APM's policy intent. The APM was introduced to address circumstances where efficient advanced procurement needs to occur ahead of project assessment and funding because of supply chain delays. This would not apply to projects of £40m or under, as funding is already available through the Load UIOLI. In addition, the APM is not intended as a way to mitigate the risk of potential future cost increases on lower-materiality load projects that may make these projects ineligible for the Load UIOLI.
- 2.17 We have therefore decided to confirm our Draft Determination not to provide Bespoke Procurement allowances (or any APM allowances) for projects expected

¹ See the Load UIOLI Governance Document here: [Electricity transmission price control 2026 to 2031 \(RIIO-ET3\) guidance | Ofgem](#)

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to be funded through the Load UIOLI. We consider any APM Expenditure on flexible or bespoke Equipment and Related Services intended to be used on Load UIOLI-eligible projects as ineligible because it is eligible for funding via the Load UIOLI allowance.

Declined Bespoke Procurement allowances for customer-funded projects and assets

2.18 Transmission investment can broadly be categorised according to the beneficiaries of the assets and how costs are recovered:

- Infrastructure assets (H1 assets) provide wider network benefits and serve multiple users. TOs procure, own and operate these assets, with costs recovered from domestic consumers through transmission network charges.
- Connection assets (A1 assets) are constructed to serve a specific customer connection and are generally paid for by that customer, either through ongoing connection charges or an upfront capital contribution.
- One-off works (C1 assets) comprise customer-requested enhancements beyond the standard connection offer, with the additional costs typically borne by the requesting customer.

2.19 In our Draft Determinations, we proposed declining Bespoke Procurement allowances for A1 and C1 connection GIS assets, reflecting our view that these assets are expected to be funded by connection customers rather than by consumers.

2.20 TOs disagreed with our reasons for declining, noting that portfolio-based procurement and evolving project scope can result in assets moving between funding categories over time, eg from A1 to H1 and vice versa. They note that APM eligibility should be determined by the need for advance procurement, the fact that licensees procure and own these assets, and the ability to trace expenditure, rather than by the ultimate funding route.

2.21 These responses raise broader questions regarding the interaction between the APM and customer-funded connection assets, and whether and to what extent consumers should bear the risk of advance procurement for assets that are solely for use by a single customer. We want to consider these questions in the context of any protections available to TOs through securities under customer contracts for procuring customer assets in advance, and the potential rewards that TOs could achieve through the new Connections financial output delivery incentive to take on some risk and deliver timely connections.

2.22 We have therefore decided to confirm our Draft Determinations not to provide APM Bespoke Procurement allowances for customer-funded A1 and C1 assets.

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- 2.23 We intend to engage further with TOs and stakeholders following publication of our Final Determinations to better understand these issues and assess whether any future changes to the APM framework would be in the interests of existing and future consumers.

Conditions associated with approved Bespoke Procurement allowances for customer connections projects

- 2.24 In our Draft Determinations, we proposed approving Bespoke Procurement allowances for infrastructure GIS assets (H1) for several customer connections projects. These approvals are subject to conditions that TOs must satisfy themselves of before incurring any APM Expenditure. TOs do not need further Ofgem approval.
- 2.25 Our conditions are designed to mitigate the risk of stranded procurement and ensure that any Equipment and Related Services are procured once customers sign Gate 2 offers through the reformed connections process. Gate 2 applies to projects that meet the requirements for readiness and strategic alignment with the UK's energy goals. These projects can secure a confirmed connection date, connection point, and queue position. We consider that the risk of stranded procurement is lower where Gate 2 offers have been issued and signed. However, we recognise the ongoing delays in issuing Gate 2 offers.
- 2.26 TOs raised concerns that waiting to procure until Gate 2 offers are signed risks delays to project delivery.
- 2.27 The majority of the customer connections projects that we proposed approving Bespoke Procurement allowances for have delivery dates in 2030 and beyond. Our conditional approval therefore remains an important protection against the risk of stranded procurement in these instances. For these projects, we have decided to maintain our conditional approval.
- 2.28 However, there are three projects with delivery dates in 2029 where relevant assets must be procured before Gate 2 offers are issued and accepted in order to avoid delays to project delivery. For these projects, we have decided to remove the proposed condition. All three are strategic and necessary projects, and one in particular facilitates connections of CP2030-critical generation projects. We are satisfied that this sufficiently mitigates the risk of stranded procurement.

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3. Modular Substations

This section sets out our Final Determinations to include Permanent Modular Substations as a new APM Cost Category.

What did we consult on?

- 3.1 We consulted on adding ‘Modular Substations (33kV, 132kV, 275kV)’ as a new APM Cost Category. We sought views on the benefits of deploying modular substations on the network, their eligibility for the APM, and whether they should be classified as ‘Bespoke-only’ under the APM or be eligible for Flexible Procurement.
- 3.2 Appendix 2 includes a summary of responses to our consultation questions.

Summary of our Final Determinations

- 3.3 We have decided to include ‘Permanent Modular Substations (33kV, 132kV, 275kV)’ as a new, Flexible APM Cost Category.
- 3.4 Consultation responses indicated that permanent modular substations face similar supply chain constraints as other substation technologies and would therefore meet eligibility criterion 1 of the APM. While we acknowledge that modular substations can be deployed in a temporary way to support network operations, we consider that the APM’s expenditure and recovery framework is best suited to assets that are deployed permanently to specific projects. Assets that are intended for repeated deployment across multiple projects are more appropriately treated as strategic assets and are therefore outside the scope of this APM Cost Category.
- 3.5 Various considerations underpin our decision to include permanent modular substations as an APM Cost Category eligible for Flexible Procurement:
 - We expect TOs to undertake robust optioneering before selecting a permanent modular substation solution for a project. This should include consideration of alternative options, including AIS substations, taking account of future network requirements and the ability to accommodate future expansion.
 - We expect TOs to procure permanent modular substations using alternatives to SF6 where these are available and technically suitable.
 - Although permanent modular substations contain some standardised components, consultation responses highlighted that they also include project-specific elements. We therefore do not consider them to be fully fungible assets. For this reason, we expect permanent modular substations to

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only be procured through contracts with optionality, where project-specific design decisions can be deferred until project certainty has increased.

- Where a permanent modular substation cannot reasonably be procured using contract optionality, or where it is highly bespoke to a specific project, we expect TOs to seek approval through an annual APM Re-opener. The APM Governance Document provides for ‘Bespoke procurement of an otherwise flexible APM Cost Category’ in paragraphs 2.30 to 2.31.

Decision Advanced Procurement Mechanism Re-opener 2026 (RIIO-ET3)**Appendix 1. Glossary of defined licence terms**

We use the following defined terms in this decision document (see Special Condition 1.1 of the ET licence):

Term	Definition
APM Allowance (APM _t)	means the allowance established by Part A of Special Condition 3.16(Advanced Procurement Mechanism (APM) Allowance and APM Re-opener (APM _t)).
APM Cap (APMC _t)	means the cap on the APM Allowance established by the Authority and specified in Appendix 1 of Special Condition 3.16 (Advanced Procurement Mechanism (APM) Allowance and APM Re-opener (APM _t)).
APM Cost Category	means an expenditure category that the Authority has deemed eligible for the licensee to use its APM Allowance against as set out in the APM Governance Document.
APM Expenditure (APMS _t)	means the amount that the licensee has spent for the purpose of booking supply chain capacity for the procurement of Equipment or Related Services in relation to an APM Cost Category, and which the licensee has reported or intends to report as APMS _t through the Regulatory Reporting Packs.
APM Governance Document	means the document issued by the Authority in accordance with Part J of Special Condition 3.16 (Advanced Procurement Mechanism (APM) Allowance and APM Re-opener (APM _t)).
APM Recovered Expenditure (APMR _t)	means the allowances initially incurred and reported as APMS _t that have been added to Allowed Revenue through other special conditions of this licence. In any given Regulatory Year, APMR _t for all Regulatory Years to date cannot be larger than APMS _t for all Regulatory Years to date.
APM Register	means a licensee-specific document held and updated by the Authority based on information provided by the licensee in relation to its use of APM Allowances, and which is shared only with the relevant licensee and will otherwise be kept confidential.
APM Re-opener	means any of the Re-openers established by Part B, Part C, Part D and Part E of Special Condition 3.16 (Advanced Procurement Mechanism (APM) Allowance and APM Re-opener (APM _t)).

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Bespoke Procurement	means, for the purpose of Special Condition 3.16 (Advanced Procurement Mechanism (APM) Allowance and APM Re-opener (APM _r)), procurement that is not Flexible Procurement, or that is procurement that the Authority otherwise decides to be bespoke and is thus assessed for APM eligibility on a project-specific basis by the Authority, and is specified as such in the APM Register.
Equipment	means, for the purpose of Special Condition 3.16 (Advanced Procurement Mechanism), any equipment specified as an APM Cost Category in Appendix 1 of the APM Governance Document.
Flexible Procurement	means, for the purposes of Special Condition 3.16 (Advanced Procurement Mechanism), procurement for Equipment or Related Services which, at the time APM Allowance was used to secure the Equipment or Related Services, did not have project-specific design characteristics that would prevent the Equipment or Related Services being used on multiple different projects.
Related Services	means, for the purpose of Special Condition 3.16 (Advanced Procurement Mechanism), services provided in connection with the delivery, installation, or commissioning of the Equipment, where these services are necessary to ensure or support the proper functioning of the Equipment.

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Appendix 2. Summary of consultation responses on Modular Substations

Q1. How do the whole-of-life costs of modular substations compare with traditional solutions?

- A2.1 Many respondents highlighted potential capital expenditure savings arising from standardisation, factory assembly, reduced on-site construction activity, shorter construction programmes, and reduced labour requirements. They argued that repeatable designs can reduce engineering effort, facilitate bulk procurement and deliver economies of scale. Some respondents also noted that reduced site works could lower construction risks and reduce exposure to local labour constraints.
- A2.2 Several respondents further noted that any cost assessment should consider programme benefits in addition to direct asset costs. They argued that earlier project delivery could reduce wider system costs by accelerating customer connections, reducing delays to network reinforcement, and bringing forward the benefits associated with new generation and storage projects.
- A2.3 However, respondents also highlighted a number of potential drawbacks and uncertainties:
- Maintenance requirements may differ from traditional substations, particularly where modular solutions utilise GIS technology or enclosed equipment.
 - Replacement of individual components may be more complex and could require outages or interventions that are more difficult than in conventional Air Insulated Switchgear (AIS) substations.
 - Asset owners may face additional obligations relating to enclosure maintenance, specialist expertise, and inventory management.
 - Some respondents raised questions about fault rectification, repair times and long-term operational expenditure, suggesting these factors should be considered alongside any capital cost savings.
- A2.4 One respondent noted that, because modular substations remain relatively novel within transmission applications, there is limited operational experience on which to base robust whole-life cost comparisons.

Q2. To what extent can modular substations provide flexibility for future network needs?

- A2.5 Many respondents submitted that modular substations can provide significant flexibility because they are standardised assets that can be procured before final project requirements are fully known and subsequently allocated to

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projects as certainty increases. Respondents described them as fungible assets that could potentially be used across multiple customer connection or network reinforcement projects.

A2.6 Respondents highlighted several sources of flexibility:

- Standardised designs allow assets to be reassigned between projects.
- Modules can potentially be stored until required.
- Procurement decisions can be separated from final project allocation, allowing projects to progress despite uncertainty regarding future connection portfolios.
- Standardisation may support a wider programme approach rather than project-by-project procurement.

A2.7 Other respondents, however, challenged the extent of this flexibility. Several argued that redeployment prospects depend heavily on technical compatibility and project characteristics. They noted that while modules themselves may be transferable, site-specific elements such as foundations, cable routes, earthing systems, protection settings, and system studies remain unique to each location.

A2.8 Additional concerns were raised regarding:

- Whether modular substations can easily accommodate future extensions.
- Whether use for a single connection project could constrain future network development in the surrounding area.
- The extent to which modular substations become project-specific once detailed engineering decisions have been made.

Q3. What are the current supply chain constraints and procurement lead times for modular substations?

A2.9 Several respondents reported that modular substations are already experiencing long lead times, with evidence suggesting procurement periods of up to around two years and the potential for lead times to increase further as demand grows.

A2.10 However, respondents frequently submitted that modularisation itself is not the primary source of supply chain constraints. Instead, constraints arise from the availability of key equipment and manufacturing capacity within the wider power systems supply chain. In particular, respondents pointed to constrained availability of electrical equipment and specialist manufacturing capacity.

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A2.11 A notable theme was that modular substations may themselves help mitigate certain supply chain risks. Respondents submitted that standardisation, repeatability and bulk procurement could reduce reliance on bespoke engineering and enable suppliers to manufacture products more efficiently.

Q4. How flexibly can modular substations be redeployed and how can stranded procurement risk be mitigated?

A2.12 Respondents submitted that stranded procurement risks can be mitigated through:

- Standardisation of module designs and reassignments of modules between projects.
- Bulk procurement of common designs.
- Ability to store completed assets pending future need.
- Reassignment of modules between projects.
- Separation of repeatable and site-specific elements.

A2.13 Some respondents proposed practical measures to improve redeployability, including maintaining configuration records, separating site-specific engineering from standard modules, and adopting staged procurement approaches under which standard equipment is secured early while project-specific elements are committed later.

A2.14 However, respondents raised substantial caveats. Several respondents submitted that redeployability depends on the asset remaining sufficiently standardised. Once project-specific design requirements are embedded, reassignment opportunities may become significantly more limited.

A2.15 Others submitted that:

- Modular substations may not be suitable for temporary deployment.
- Deployment volumes could be relatively low, limiting opportunities for reassignment.
- Technical compatibility assessments would still be required before redeployment.
- Network approval and system studies would remain necessary even where assets are physically transferable.

Q5. What proportion of modular substation costs would be licensee-funded and therefore eligible for the APM?

A2.16 A number of respondents submitted that eligibility should not depend solely on the ultimate funding classification of the project because procurement

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decisions often need to be made before final funding arrangements are known. They highlighted circumstances where customer connection projects may evolve over time or where procurement needs arise before project certainty has been achieved.

- A2.17 Some respondents emphasised that modular substations could help manage uncertainty associated with future connection portfolios, arguing that assets may need to be procured before it is clear which individual projects will ultimately require them.

Q6. Should modular substations be included within the scope of the APM as a Flexible Procurement or Bespoke Procurement category?

- A2.18 Most respondents supported inclusion within the APM but did not advocate an unconditional "Flexible Procurement" designation. Instead, many submitted that classification should depend on the characteristics of the procurement.

- A2.19 Respondents supporting Flexible Procurement argued that modular substations:

- are standardised and repeatable;
- can be deployed across multiple projects;
- provide procurement optionality;
- can be redeployed if project needs change; and
- align with the underlying objectives of Flexible Procurement under the APM.

- A2.20 Many respondents therefore supported a hybrid approach whereby:

- standardised and transferable modular substations would be treated as Flexible Procurement; and
- heavily customised or project-specific modular substations would be treated as Bespoke Procurement.

- A2.21 A minority of responses argued for bespoke treatment. These respondents questioned whether modular substations would in practice be procured at sufficient scale to justify flexible treatment and raised concerns regarding permanent deployment, limited expansion capability, and the potential for project-specific design requirements to constrain redeployment.

- A2.22 Several respondents also drew attention to unresolved policy questions. These included:

- the interaction between modular substations and GIS equipment already classified as bespoke under the APM;

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- whether permanent modular installations should be treated differently from temporary modular substations; and
- whether classification should depend on intended use, technical design or redeployment potential.

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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 decision. 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.