Decision

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

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In August 2026, we published 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 decisions on the application of the Major Projects ODI-F to these submissions.

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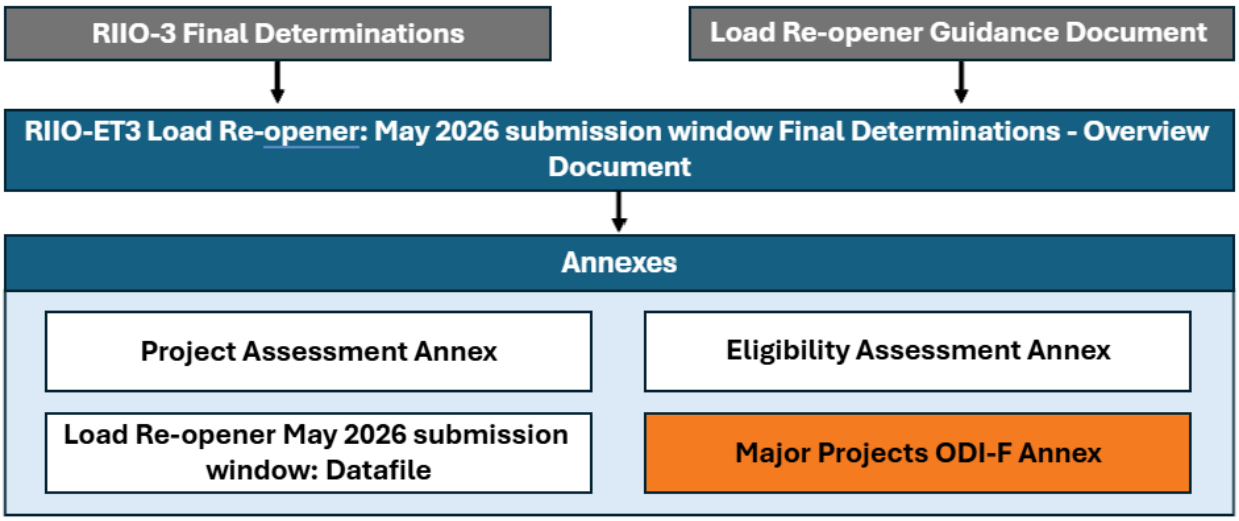
1. Introduction

1.1 This document is one of the annexes published alongside the RIIO-ET3 Load Re-opener May 2026 Final Determinations. It focuses on decisions regarding the application of the Major Projects ODI-F[1] (MP ODI-F).

1.2 Please refer to the RIIO-ET3 Load Re-opener May 2026 Final Determinations: Overview Document (as set out in Figure 1 below) for general information on:

- our consultation approach, stages, and summary of all related decisions; and
- the Load Re-opener regulatory processes and assessment approach.

Figure 1: Navigating our Final Determinations



1.3 The MP ODI-F was introduced in RIIO-ET3 to incentivise the timely delivery of significant Electricity Transmission (ET) projects. On projects where the MP ODI-F applies, Electricity Transmission Owners (ETOs) are financially rewarded where they deliver the project on-time or early, and penalised where they deliver late.

1.4 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[2] have, or are likely to obtain, the necessary inputs for the ODI-F.

[1] An ODI-F is a financial output delivery incentive.
[2] 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.

1.5 The inputs to the MP ODI-F are:

- 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.
- Target Delivery Date – 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. Where there is not a robust P50 Delivery Date available, we may use a best equivalent date as the Target Delivery Date.

1.6 Projects can be assessed against the MP ODI-F criteria at any of the Assessment Stages of the Load 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 intend to propose a final decision on its application and the design at the next 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 decide 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 did we consult on?

1.10 In August 2026, we published our Draft Determinations in relation to applications received under the May 2026 window of the Load Re-opener. This included:

- 11 projects at Eligibility Assessment stage where we were minded-to apply the MP ODI-F;
- 17 projects at Eligibility Assessment stage where we were not minded-to apply the MP ODI-F (including one project we deem not eligible for the Load Re-opener); and
- one project at Project Assessment stage where we proposed to not apply the MP ODI-F.

1.11 We received nine responses to our Draft Determinations in total – one from each ETO, Citizens Advice, four from data centre developers and interest groups, and one independent individual.

Applications overview

1.12 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 MP ODI-F under SpC 4.8.

1.13 We received 28 Eligibility Letter applications and two Project Assessment applications in the May 2026 window.

1.14 One of these Project Assessment applications, 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) re-opener. 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. We will assess suitability of the project for the MP ODI-F at this later stage.

1.15 We have considered all other submissions for the application of the MP ODI-F.

Related publications

1.16 This document is intended to be read alongside:

- RIIO-ET3 Load Re-opener: May 2026 submission window Final Determinations - Overview document
- Draft determinations for the RIIO-ET3 Load Re-opener May 2026 submission window | 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
- Major Project ODI-F Governance Document: Electricity transmission price control 2026 to 2031 (RIIO-ET3) guidance | Ofgem
- 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

Decision: RIIO-ET3 Load Re-opener May 2026 Final Determinations: Major Projects ODI-F annex

- 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 and Final Determinations

Summary of assessments

2.1 We have used the information within the ETOs' applications to the Load Re-opener to assess the suitability of a project for the application of the MP ODI-F.

2.2 In the May 2026 Load Re-opener window, we assessed 29 applications for the MP ODI-F: One Project Assessment and 28 Eligibility Assessments. These projects are summarised in Table MP1 below, along with our decision on application of the MP ODI-F.

2.3 We have changed one decision following our consultation on our Draft Determinations. We now intend to apply the MP ODI-F to SPT's VSRE XH & XJ Routes 400kV Major Refurb project. All other decisions on the MP ODI-F remain the same as published in our Draft Determinations.

2.4 NGET's ETRE application has been listed as Not Applicable (N/A) as we consider it to be ineligible for the Load Re-opener. This is the same as in our Draft Determinations. More information on this decision can be found in the Eligibility Assessment Annex.

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

Project Name	ETO	Assessment Stage	Decision on MP ODI-F	Change since DDs
Aberthaw – Site Strategy	NGET	Eligibility	Minded-to not apply at any stage	No
Banwen (Rhigos B)	NGET	Eligibility	Minded-to not apply at any stage	No
Berkswell	NGET	Eligibility	Minded-to not apply at any stage	No
Blyth 400kV Site Strategy	NGET	Eligibility	Minded-to apply at a future stage	No
Bodelwyddan 400kV Extension	NGET	Eligibility	Minded-to apply at a future stage	No
Bolney 400kV Site Strategy	NGET	Eligibility	Minded-to not apply at any stage	No

Project Name	ETO	Assessment Stage	Decision on MP ODI-F	Change since DDs
Bridgend	NGET	Eligibility	Minded-to apply at a future stage	No
East Claydon – Enderby – Patford Bridge 1 and 2 OHL	NGET	Eligibility	Minded-to apply at a future stage	No
ETRE	NGET	Eligibility	N/A	No
Farmoor	NGET	Eligibility	Minded-to not apply at any stage	No
Feckenham – Hams Hall OHL	NGET	Eligibility	Minded-to apply at a future stage	No
Feckenham – Ironbridge OHL	NGET	Eligibility	Minded-to apply at a future stage	No
Imperial Park 400/132kV Upgrade	NGET	Eligibility	Minded-to not apply at any stage	No
Ince SGT Extension	NGET	Eligibility	Minded-to not apply at any stage	No
Keadby 132kV	NGET	Eligibility	Minded-to not apply at any stage	No
Kingsnorth 400kV Extension	NGET	Eligibility	Minded-to not apply at any stage	No
Laleham 132kV Extension	NGET	Eligibility	Minded-to not apply at any stage	No
Lower Frankton 400kV AIS Substation	NGET	Eligibility	Minded-to not apply at any stage	No
North West London	NGET	Eligibility	Minded-to apply at a future stage	No
SCRE (COTT4 – STAY4) and WRRE (WBUR4 – RATS4) OHL	NGET	Eligibility	Minded-to apply at a future stage	No

Project Name	ETO	Assessment Stage	Decision on MP ODI-F	Change since DDs
Tees Dock Substation	NGET	Eligibility	Minded-to apply at a future stage	No
Tilbury 275kV Rebuild - RIIO T3 Holistic Site Strategy	NGET	Eligibility	Minded-to apply at a future stage	No
Warley 275kV Substation Replacement	NGET	Eligibility	Minded-to apply at a future stage	No
Willington 132kV Rebuild	NGET	Eligibility	Minded-to not apply at any stage	No
VSRE XH & XJ Routes 400kV Major Refurb	SPT	Project Assessment	Apply at this stage	Yes
Energy Isles (Kergord) Windfarm Connection	SHET	Eligibility	Minded-to not apply at any stage	No
Knocknagael Farigaig HVP	SHET	Eligibility	Minded-to not apply at any stage	No
Loch Na Cathrach Cluster	SHET	Eligibility	Minded-to not apply at any stage	No
Shetland On-Island Infrastructure	SHET	Eligibility	Minded-to not apply at any stage	No

2.5 In reaching these positions, 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 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 to incentivise the ETO to deliver on time or early will provide tangible benefits to GB consumers. Our specific considerations are set out in Chapters 3 and 4.

2.6 Where we are minded-to apply the MP ODI-F in future, 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. Similarly, where we are currently not minded-to apply the incentive, this could change.

3. Decisions for projects at Eligibility Assessment stage

3.1 In the May 2026 Load Re-opener window, we assessed 28 Eligibility Letter applications for the MP ODI-F.

Projects where we are minded-to apply the MP ODI-F

3.2 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:

- NGET Blyth 400kV Site Strategy,
- NGET Bodelwyddan 400kV Extension,
- NGET Bridgend,
- NGET East Claydon – Enderby - Patford Bridge 1 and 2 OHL,
- NGET Feckenham – Hams Hall OHL,
- NGET Feckenham – Ironbridge OHL,
- NGET North West London,
- NGET SCRE and WRRE OHL,
- NGET Tees Dock Substation,
- NGET Tilbury 275kV Rebuild, and
- NGET 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 in future. This list of projects is the same as proposed in our Draft Determinations.

3.3 Stakeholder responses provided a range of views on our proposals. NGET and SPT raised concerns that our application of the MP ODI-F was inconsistent, and NGET requested we consult on the specifics of the incentive application for each project. Citizens Advice recognised the need for a strong financial incentive to reflect consumer interest in the delivery of electricity transmission infrastructure. It was suggested that the MP ODI-F only be applied where there is an evident and immediate case for consumer benefit. Citizens Advice requested more information on the consumer benefits associated with Blyth, Tees Dock, and Bridgend. We also received responses from one data centre developer and one data centre interest group regarding specific projects, each agreeing with the application to those projects (NGET's East Claydon – Enderby - Patford Bridge 1 and 2 OHL project, and NGET's Feckenham – Hams Hall OHL project).

3.4 We also received one response from an independent individual, which provided extensive commentary on the Load Re-opener, MP ODI-F and other associated mechanisms, as well as the individual projects set out in our Draft

Determinations. The response did not provide clear views on the consultation questions or indicate agreement or disagreement with our proposals. Rather, it largely focused on broader evidential, procedural, and definitional considerations, supported in places by hypothetical scenarios. As such, while we have considered the points raised, they have not directly informed our conclusions on the matters consulted upon, with many of the topics already considered at RIIO-ET3 Final Determinations and in the mechanism design, and so the response is not referenced further below.

3.5 For each project listed in paragraph 3.2, we stated in our Draft Determinations that we expect ETOs to provide a P50 Delivery Date developed in accordance with the methodology approved by Ofgem at their next Assessment Stage. NGET stated that they will be unable to provide P50 Delivery Dates at the next stage, the Needs Case Assessment, for those projects which we have determined are eligible for Assessment Track 3. Setting the Target Delivery Date later means that ETOs have more certainty on project timelines and delivery schedules. However, the sooner we are able to set the Target Delivery Date according to consumer interest, the more clarity the ETOs will have on our expectations for project delivery. As set out in RIIO-ET3 Final Determinations, we consider that there is consumer benefit in incentivising decision-making during the period leading up to the ETO's Project Assessment applications. As such, we maintain our position that ETOs must provide robust P50 Delivery Dates at their next Assessment Stage.

3.6 For assessment details on each of the projects listed in paragraph 3.2, see the MP ODI-F Annex of our Draft Determinations published on 27 August 2026.

Projects where we are not minded-to apply the MP ODI-F

3.7 Following our assessment of the projects in Table MP1 against the eligibility criteria set out in the Major Projects ODI-F Governance Document, we 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)
- 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

3.8 We do not consider these projects meet the criteria for MP ODI-F application; this list of projects is the same as proposed in our Draft Determinations.

3.9 Stakeholder responses demonstrated either neutral or positive views on our proposals. SHET supported our proposals not to apply the incentive to any of their projects, whilst NGET stated that it needed more information to understand Ofgem's decisions. We also received a response from a group of data centre developers who recommended keeping NGET's Berkswell under assessment, highlighting strategic elements for Ofgem to consider.

3.10 NGET stated that it was not clear how we had applied the assessment criteria for projects where we are not minded-to apply the MP ODI-F. We set out further clarification below for why projects may not be eligible for the MP ODI-F.

3.11 When deciding whether projects would be eligible for the MP ODI-F, we looked across the eligibility criteria holistically to determine whether application of the MP ODI-F would be in the consumer interest. Where a project did not clearly demonstrate the criteria of consumer benefit, strategic importance, and practicality requirements were not met, we decided to not apply the MP ODI-F. Factors which contributed to our decision to not apply the MP ODI-F include but are not limited to:

- lack of strategic system need: where applications did not demonstrate how the project would materially support the delivery of wider strategic system needs;
- project driver of single connection customer: where the investment driver was a single, non-strategic connection customer, or the project is funded by the Connection Customer;
- lack of urgency: while important to the system, it wasn't clear that delivery needed to be accelerated;
- uncertainty over future need: where applications highlighted a high degree of uncertainty around project need or investment drivers; and
- deliverability concerns: where we considered that we would be unlikely to obtain a credible P50 Delivery Date to calibrate the incentive.

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

4. Decisions for projects at Project Assessment stage

SPT VSRE XH & XJ Routes 400kV Major Refurb

4.1 In our Draft Determinations, we proposed not to apply the MP ODI-F to SPT's VSRE XH & XJ Routes 400kV Major Refurb project. We identified VSRE as primarily an asset replacement and refurbishment project rather than a strategic network expansion or reinforcement project. We therefore considered that it was not within the policy intent of the incentive. However, we stated that we would reconsider this position if stakeholders provided 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.

4.2 Whilst Citizens Advice agreed with our proposal not to apply the MP ODI-F, SPT disagreed with our decision and the rationale behind it. SPT disagreed with our assessment of the project as an asset replacement and queried why the other OHL reconductoring projects could qualify as a strategically important network enhancement that deliver consumer benefit, but VSRE did not. SPT signalled that VSRE is included the Holistic Network Design and is essential for delivering Clean Power 2030 and therefore could meet the criteria for strategic.

4.3 We agree that VSRE delivers an increase of transfer capability across the East-West corridor in Scotland, which is part of a wider portfolio of work to reduce system balancing and constraint costs to consumers. Late delivery of VSRE will be associated with additional costs through constraint payments, which is a detrimental outcome for consumers. Conversely, early or timely delivery of VSRE will provide consumer benefit, through the avoidance of constraint costs. Therefore, we consider that VSRE meets the criteria of strategic importance and consumer benefit to apply the MP ODI-F. On this basis, we have changed our position from Draft Determinations, and we now intend to apply the MP ODI-F to VSRE to incentivise timely delivery.

4.4 VSRE is at Project Assessment stage, which is the final regulatory step for Load Re-opener projects, and in conjunction with this we are cognisant that VSRE is into the delivery phase. This means setting the MP ODI-F any later dilutes the policy intent of driving SPT's delivery decisions to meet a Target Delivery Date that delivers maximum impact for consumer interest and strategic goals. Therefore, we are proceeding with applying the MP ODI-F now.

4.5 Our RIIO-ET3 Final Determinations set out three different designs for the incentive, and that we will decide which design will apply to each Major Project at the time of introducing that project to the ODI-F incentive. The availability of a P50

Delivery Date and ODD determines which design we select. We intend to apply Design B[3] of the MP ODI-F to VSRE because we do not have a NESO-provided ODD. Under Design B, we use the P50 Delivery Date as the Target Delivery Date. In RIIO-ET3 Final Determinations, we said that the P50 Delivery Date should be verified by either NESO or by us. While NESO is still developing the methodology for P50 Delivery Dates, we will propose a revised P50 Delivery Date determined through regulatory judgement on the best available evidence.

4.6 We are not comfortable using the P50 Delivery Date submitted by SPT as the Target Delivery Date. The submitted P50 Delivery Date raises material concerns around robustness because the date has been provided to us in a form that cannot be independently reproduced or undergo sensitivity analysis. Although we have concerns around the credibility of the submitted P50 Delivery Date, we still consider that there are consumer and strategic benefits of incentivising the delivery of VSRE. Therefore, we will proceed with setting the incentive calibration, but we will use a Target Delivery Date which is informed by regulatory judgement. For VSRE, alongside the consultation on the statutory licence modifications, we will consult on options for setting the Target Delivery Date for VSRE, which will in turn impact the overall value assigned to the project under the incentive.

[3] See the Major Projects ODI-F Governance Document for more information on the designs: Electricity transmission price control 2026 to 2031 (RIIO-ET3) guidance | Ofgem

5. Other Responses to our Draft Determinations

5.1 SHET and NGET raised an overlap between the Connections ODI-F[4] and the MP ODI-F. NGET stated that six of the 11 projects within the MP ODI-F 'minded-to apply' list could become subject to the Connections ODI-F, given their connection drivers. This potential overlap was addressed in RIIO-ET3 Final Determinations, where we recognised that there might be instances of projects being eligible for both the MP ODI-F and the Connections ODI-F. If there are instances where a project is eligible for both the MP ODI-F and the Connections ODI-F, we consider this to be justified given the differing outcomes that each incentive is driving. The timely delivery of a project incentivised under MP ODI-F will relieve constraint costs and timely delivery incentivised by the Connections ODI-F will ensure the contracted connection dates are met. For all the six projects in this re-opener window which may be subject to both the MP ODI-F and the Connections ODI-F, we consider that applying both incentives will drive different ETO behaviours which are in the consumer interest. This is consistent with our position in RIIO-ET3 Final Determinations. We will continue to assess the potential application of the MP ODI-F and Connections ODI-F on a case-by-case basis.

5.2 Citizens Advice asked for clarity on the scope of the incentive, specifically asking about the whether the incentive covers demand connections projects (such as Blyth, Tees Dock and Bridgend) as well as low-carbon generation projects. The policy intent behind this ODI is to incentivise timely delivery of new ET projects where there is consumer interest in doing so. The purpose of the MP ODI-F is not focused solely on connections but considering where the ET project will deliver wider consumer interest, regardless of load drivers. Therefore, the incentive design covers a broader scope than connecting low-carbon generation projects, as other types of connections deliver consumer value, such as socio-economic benefits.

[4] The Connections ODI-F is a RIIO-ET3 incentive mechanism designed to incentivise ETOs to deliver connections projects in a timely manner, such that they meet contractual arrangements with customers.

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.