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22 September 2020

To whom it may concern

### **Implications of the RIIO-T2 Draft Determinations: Consultation Response**

I am writing in response to the RIIO-T2 Draft Determinations on SHE Transmission's (SHET) Business Plan and to share our concerns over the implications Ofgem approach will have to our industry and the ability to reach net zero targets.

3DW create interactive 3D solutions which make complex infrastructure projects easy to understand and have worked closely with SHET during their RIIO T1 framework, alongside many renewable energy developers. Our innovative 3D solutions support the design, planning and consultation activities associated with overhead power lines and power stations through services such as interactive 3D computer models, bespoke interactive 3D applications, multimedia video production and public consultations.

It is a worry that the level of RIIO-T2 budget reductions being applied to SHET will have an impact on the delivery of their sustainability policies and targets, including decarbonisation, biodiversity net gain, waste and increased local content in contracts. This includes having contracts with companies such as ours which assists the supply chain and employment at a critical and uncertain time with Covid 19.

When faced with a shortage of funding to deliver works, we expect SHET will be forced to concentrate on technical and safety requirements with insufficient funding for discretionary work which is required to deliver these goals.

This will have a direct impact on the consenting process for projects and utilising services such as ours. We have developed our 3D visual modelling tool with SHET over several years and have proven results of achieving successful planning applications with lower cost designs.

Development in innovation has been crucial for continuous improvement in preconstruction activities – most recently our technology has assisted the public consultation process in Argyll and Kintyre, where face to face engagement was not possible due to the current climate, via the implementation of a virtual consultation platform to allow community members and statutory consultees to effectively engage in SHET's planning process. Should preconstruction activities be impacted due to the cuts to which Ofgem propose, this will not only have a direct



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impact on businesses such as our own but will also have a detrimental impact to the local communities who see massive benefit in engaging with our technology in order to aid their understanding of these complex projects.

It is critical that SHET have sufficient funding in order to invest in technology now so long-term efficiency savings can be achieved which will then be passed on to consumers. We would ask Ofgem consider the points raised above and increase the allowances.

Kind regards

Andy Dennison  
Director, 3D Web Technologies Ltd.