



SAVE MINSTER MARSHES CAMPAIGN

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10 February 2025

Submission to Ofgem's call for evidence RIIO-T3¹

- a) Organisation: Save Minster Marshes campaign
- b) Commenting on National Grid Electricity Transmission's (NGET) RIIO-T3 business plan²
- c) Response is not confidential
- d) Concise summary of issues identified: Our experience of the Sea Link project consultation in Kent has shown us that NGET's business plan pledges are not reflected in reality. We provide evidence below.
- e) Evidence for our position is laid out with reference to relevant sections of NGET's business plan as applicable.

STRATEGY

We were interested to read about the overarching strategy for a sustainable and balanced mix of new types of power generation. We were disappointed to find:

- the "hydrogen strategy" appears once only on page 11 in relation to Humber Zero
- nuclear generation is mentioned in passing in the Executive Summary, in the summary of some of the regions' plans in relation to existing uranium driven nuclear provision only, despite it being a carbon free method of delivering power.
- there is no mention of investment and research into Thorium Nuclear power, which is being developed at scale in China and possibly India³ and which produces less long lived radioactive waste.

The DNV Energy Forecast⁴ states:

"Due to the high capital costs, nuclear power is expensive from a levelized cost perspective, as Figure 6.13 shows. As an illustration, it is almost always more than twice as expensive as offshore bottom-fixed wind through to 2050. High capital costs and lengthy lead times will continue to be important barriers for nuclear power. The absence of long-term, viable solutions for managing nuclear waste and the rising costs and construction times, especially because of increased safety concerns, will limit new nuclear power's ability to compete with other renewables in the short term from an exclusively economic perspective.

Policy is therefore the key driving force behind capacity additions in nuclear, especially given recently heightened energy security concerns following the Russian invasion of Ukraine and the ensuing energy crisis.

Many countries are once again considering nuclear as a viable option free of fluctuations and dependency on other countries. This has also led the UK government to consider extending nuclear plant lifetimes through upgrades and life-extension measures. The government is also set to announce up to £157 million in funding for nuclear projects. This includes up to £77.1 million for advanced nuclear business

¹ https://www.ofgem.gov.uk/sites/default/files/2024-12/RIIO-3_Call_for_Evidence.pdf

² <https://www.riio3.nationalgrid.com/document/30069/download>

³ [Thorium's Long-Term Potential in Nuclear Energy | IAEA](#)

⁴ <https://www.dnv.com/energy-transition-outlook/download/> h



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development and £58 million for the development of advanced modular reactors (AMRs) which run at higher temperatures.”

How is the plan addressing and contributing to Government Policy on this matter?

- Carbon Capture and Storage is mentioned only once in the document in relation to research in Wales and in an ellipsis on the graphic on the Executive Summary 1.3
- The DNV Energy Forecast⁵ predicts that “We expect installed solar capacity to grow from 16 GW today to 30 GW in 2035 and 57 GW in 2050”. Our experience of solar farm proliferation with associated large scale battery storage at Richborough (Kent end of Sea Link) highlights the lack of coordinated planning and contempt for the cumulative impact of these schemes. In the Executive Summary 1.3. an increase from 15 to 47 GW in solar is predicted. But it only warrants two other mentions in the plan.
- Biomass generation is only mentioned twice in the Business Plan, once in the graphic in the Executive Summary and once in passing on page 13 (Midlands Region plan). The DRAX facility has recently admitted to importing old growth primary forest for pelletising and burning at its facility in Yorkshire. See quotes below from BBC article accessed 09/02/2025⁶

“The government’s scientific advisors on the Climate Change Committee - an independent non-departmental public body - warned that subsidies for burning wood pellets should not be extended beyond 2027.”

“The company doesn’t dispute that it is still taking wood from old-growth sites that are not priority deferral areas.”

“In fact, the power station emits about 12 million tonnes of carbon dioxide a year, but under international rules the UK doesn’t have to count these emissions.”

“Drax helps the UK government meet its climate targets because, on paper at least, the power station is treated as emission-free. This is because international carbon accounting rules state that greenhouse gas emissions from burning wood are counted in the country where the trees are felled as opposed to where they are burned.”

Where is the planning for phasing out the use of use of Biomass, which has been proved to contribute directly to greenhouse gas emissions? NGET fail to mention this dirty part of the problem with their concentration on wind power. It is surely OFGEM’s responsibility to ensure that NGET consider and plan for phasing this out? The current ‘do nothing’ approach is not adequate.

- It appears that the driver for NGET’s disappointing programme is in the following statement from their Plan

“Up to c.£19bn for increasing network capacity, the majority of which is part of the ASTI regime which Ofgem created in 2023. This increase in network capacity is time critical. Consumers are bearing billions of pounds of constraint costs because the network to transport energy is not available yet.”

⁵ [Download our Energy Transition Outlook 2024](#)

⁶ <https://www.bbc.co.uk/news/science-environment-68381160>



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The ‘wild west’ that deregulation of the industry let loose on the UK has led to a proliferation of foreign owned wind power companies delivering power that cannot be used when at peak capacity leading to the government paying them constraint costs. This is the main driver of the current plan; reduce the constraint costs and become a net energy exporter.

What this plan fails to remark on (or plan for) is that all the other operators in this space in Europe are working to the same end - so the export market post 2050 may be a chimera.

We make further comments on two specific areas where we know that NGET does not deliver on its promises below: community engagement and transparency; and environment.

Community engagement and transparency

NGET’s commitments in RIIO-T3	Our experience with the Sea Link project consultation
<p>1.6 Delivery Constraint 4: Community acceptance</p> <p>We are consulting and communicating with communities early in the planning process.</p>	<p>We believe that National Grid (NGET) has breached the Gunning Principles in a number of ways and are taking legal advice on this⁷.</p> <p>NGET only consulted after it had decided on the preferred option at Richborough and discarded other options. See documentation online of the pre-inception meeting with the Inspectorate that show Richborough was the only option on the table in 2019 for the Kent landfall well before the consultation began. It is not a consultation if the outcome was already decided, and NGET is using the consultation as a ‘box ticking’ exercise.⁸</p> <p>A 10,500 signature petition against the scheme was completely ignored although we know that it was delivered within the deadline for the 2023/24 consultation.</p> <p>The only advertising about the consultation process that we are aware of was in the Isle of Thanet News online page and Kent Online. As news readership is now fragmented, we understand that it is difficult to engage. But there were no posters in any of the towns and door to door leafleting was haphazard.</p> <p>The majority of the Public Information Events were held during business hours, which limited those who work away being able to</p>

⁷ <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf> (accessed 03/02/25)

⁸ <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020026/s51advice/EN020026-Advice-00001> (see PDF accessed 03/02/2025)



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	<p>attend the meetings. Answers to questions were hard to come by from the staff who manned the events, some of whom appeared aggressive when challenged over the assumption that the project would go ahead without any amendment.</p> <p>Consultation documents that were available from libraries were only available on request. NGET excluded Broadstairs library from their distribution list for reasons which are not at all clear, particularly when Broadstairs is closer geographically to Richborough than Margate. While there was no legal requirement for NGET to provide information in either Margate or Broadstairs libraries, it is odd that Broadstairs was excluded while Margate was not, despite being further away. NGET also count Margate library twice as a consultation location (once called Margate and once called Thanet when they are the same library)⁹.</p> <p>Our own polling of all residents of Cliffsend (within the red target zone for the consultation) found that fewer than 1 in 10 people had received anything at all through their door about Sea Link. Many when questioned were aghast, as they had no idea about the project and its likely impact for the 5 years of the build. As the scale of the project and length of the construction period has become more apparent, residents of Cliffsend are now finding their houses are difficult to sell because of the Sea Link project blight.</p> <p>Hard copies of all the proposals can only be obtained from NGET at a cost of £350 – putting it outside the reach of those stakeholders who are not online and unable to afford such an outlay.</p> <p>Community relations are very poor. Emails to the project team with direct questions have gone unanswered. Some people have had responses that are trite and are clearly designed to stonewall. There has been no attempt to truly answer any of the questions raised and requests for meetings have been ignored.</p> <p>The last additional round of consultation in November 2024 was kept quiet. Stakeholders were narrowly described as those who had a ‘land interest’. Residents of Pegwell, Cliffsend and Minster were not made aware of the new consultation and indeed one affected land holder was also ignored.</p> <p>The new area of ‘mitigation’ for wildlife was not circulated to those who had previously commented and is widely believed to be totally unsuitable as it is not functionally linked land.</p>
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⁹ <https://www.nationalgrid.com/media-centre/press-releases/national-grid-undertaking-further-consultation-changes-its-proposals-reinforcing-network-between>



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	<p>Stakeholders who have responded to the consultation have been variously ignored, or fobbed off with stock phrases and none of their direct questions answered. Requests for meetings have gone unanswered.</p>
<p>1.6 Delivery Constraint 4: Community acceptance</p> <p>We make changes to our proposals where possible and if we cannot, we explain why</p>	<p>Stakeholders, including our two MPs for both constituencies impacted by the proposed landfall in Kent, have been asking for:</p> <ul style="list-style-type: none"> - A true examination of the alternative landfall points for Kent showing full and transparent cost comparisons between the alternative sites. - The rationale behind why an integrated offshore grid was discounted. This has not been explored by NGET despite offering known cost-savings and reductions in infrastructure. This is currently the approach taken in Europe. - The opportunity for co-location with Nautilus was discounted early on and then reinstated. This change has not been explained. - The last major change to the Richborough end of Sea Link is to plan for 20m deep piling across 9 hectares of the marsh to stabilise the unsuitable marsh land and then build up a concrete raft 2 meters in depth for the foundations of the converter station building. The additional cost of this part of the project has not been made public and would have a considerable bearing on their assertion that Richborough is the cheapest option. - The proposal for mitigation is arguably worse as it is not functionally linked land to Pegwell Bay and is surrounded by industry. The rationale for this change of mitigation is weak.
<p>1.6 Delivery Constraint 4: Community acceptance</p> <p>We are deploying digital tools, like 3D visualisations, to make it easier for people to engage with the developments we are proposing for their communities.</p> <p>5.3 Digitalisation and Data Strategy</p> <p>In RIIO-T2, we established a digital operating model, promoting a 'digital-first'</p>	<p>None of the stakeholders were aware of digital 3D visualisations. Virtual reality headsets were certainly not in evidence at any events and the original information packs failed to show how the converter would look from key vantage points.</p> <p>Indeed, the model at the public information events did not show any of the pylons, because it had apparently been too difficult to create them with the 3D printer – so they were simply not shown.</p> <p>The model at the public information events did not include the functionally linked saltmarsh land at Pegwell Bay, making it difficult for people to understand the location and its relationship to the RAMSAR, SSSI, SAC and NNR sites.</p> <p>Further, the visuals are from distant footpaths and little used roads where the lie of the land means the height of the converter station is</p>



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<p>approach to transforming processes. For our ASTI projects, we are using state-of-the-art 3D models and virtual reality headsets to show the public how proposals could look in the local landscape</p>	<p>concealed, rather than from locations where the converter will be easily seen, such as Sevenscore roundabout or Cottingham Hill. In fact, there are no visualisations at all from the major roads that are closest to the proposed site of the converter station, nor from those residential properties, recreation areas, businesses and open spaces identified in the PEIR as being most impacted by the development. This is not ‘showing the public how proposals could look in the local landscape’.</p> <p>In addition, the visualisations were created when the proposed height of the converter station was 26 metres. The latest proposals increase this height to 28 metres, but no additional visualisations have been created.</p>
<p>4.2 Making a positive contribution to our communities and supporting consumers in vulnerable situations</p> <p>Deliver both local community benefits and regional socioeconomic legacy benefits</p>	<p>Thanet is one of the most deprived communities in the South East as well as one of the most nature deprived. NGET has not made any assurance of delivering on social value for our community and the impact of the Sea Link project on our vital tourism industry will be immense. This has not been addressed, nor has any mitigation been suggested.</p> <p>Further, tourism plays a vital role in our local economy and is a major source of employment and income. In the PEIR published in October 2023, NGET concluded: ‘No effects to private or community assets including, residential properties, business premises, community facilities, development land, open space and tourism attractions have been identified.’</p> <p>We can only assume this is because of limited analysis or poor methodology on NGET’s part as the impact on residents, businesses, open spaces and tourism will be immense.</p>
<p>5 Building trust through data transparency</p>	<p>There has been a distinct lack of transparency in the way that NGET has approached the Sea Link project and in how it is sharing information with stakeholders in the RIOT3 Business Plan.</p> <p>Specifically, in its consultation on Sea Link:</p> <ul style="list-style-type: none"> ● Refusal to share granular costings, even in the event of clear changes to the cost basis such as the new concrete piling and foundation at Richborough ● Inability to supply the carbon footprint calculations whilst touting the project as a ‘green’ scheme, premised on green energy that is better for the planet ● Inability to supply a Cumulative Impact Assessment of additional building and solar schemes for the Richborough area when asked. <p>In the RIOT3 Business Plan:</p>



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	<ul style="list-style-type: none"> • There is a lot of redacted data, making it impossible to have a complete picture; • NGET has not published its Investment Decisions Pack, Engineering Justification Papers and CBA with the business plan for stakeholder scrutiny; • Refusal of NGET to share risk register.
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ENVIRONMENT

NGET's commitments in RIIO-T3	Our experience with the Sea Link project consultation
<p>02 Nature Positive</p> <p>To respond to the global biodiversity crisis, we are taking a proactive approach to preserve, restore and enhance the natural environment.</p> <p>We have a responsibility, demanded and expected by our stakeholders, to protect against species loss, ecosystem collapse and to prevent unintended consequences from our efforts to accelerate the transition</p>	<p>More than half the world's flora and fauna rely on wetland and the UK has lost 90% of our wetland in the last 100 years.</p> <p>Pegwell Bay has numerous legal protections such as RAMSAR, SSSI, NNR, SAC in recognition of its position as an internationally important wetland. Further, Minster Marshes are also a wetland, and are functionally linked to Pegwell Bay, meaning that numerous species of birds, including many on the UK's red list will suffer from further habitat loss. The Sea Link project will directly contribute to species loss. In fact, it is harder to find a site which would have a more detrimental impact on biodiversity than the one NGET has chosen.</p> <p>The section on the RIIO-T3 Environmental Investment has been heavily redacted so we are unable to comment further.</p>

Environmental commitments required by OFGEM

OFGEM to NGET	NGET states	Save Minster Marshes campaign response
Section 4.48 provides OFGEM's view of the minimum level of ambition they would expect should be set out in company business plans in relation to mitigating their environmental impact. Where these initiatives, measures, or templates are not	<p>At 2.3 of their Business Plan NGET states "Our research showed protecting and improving wildlife and natural environments is valued by consumers."</p> <p>"Notwithstanding calls for an increased percentage, our</p>	In NGET's EAP the word 'protection' appears only 5 times and never in respect of legal protections such as RAMSAR, SSSI, NNR, SAC, which they appear keen to ignore in the case of the Sea Link project's southern landfall at Richborough.



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thought to be appropriate or adequate, companies should provide clear justification for why they believe this to be the case in the notes section of the given table.	strategy is not to increase the target percentage over 10% across the broad range of our construction projects, but rather ensure that the maximum benefits and value can be extracted from the implemented consumer-funded BNG which is delivered – a focus on ‘quality’ rather than ‘quantity’. This is particularly important for new overhead lines and underground cables where BNG would need to be delivered on third party land, much of it which is often farmland used for crops or grazing. 10% is not seen as a specific target or cap and we will work with our strategic partners to seek opportunities to deliver in excess of 10% where viable.	<p>The Government is seeking to position the Sea Link project and the Great Grid Upgrade as a Green Energy Project directly contributing to Net Zero by 2030. However, the calculations that show how turning 16 hectares of important carbon sink marshland into concrete for the Sea Link project will reduce carbon emissions have not been provided despite our requests for them. The project has been going since 2019.</p> <p>Landfall at Kent for the Sea Link Project is via a site that has SSSI, RAMSAR, NNR and SAC protection because they say it is the cheapest. None of these important environmental protections are being respected and they are ignoring local consumers and stakeholders.</p>
4.49 Each company should submit an Environmental Action Plan (EAP) alongside its business plan which draws together the direct carbon impacts claimed in Investment Decision Pack submissions (eg leakage, losses, EV fleet) and will include a list of all IDP submissions where: <ul style="list-style-type: none"> • carbon reduction is the main driver of the proposal; 		<p>The carbon capture numbers within their business plan are redacted. NGET positions Sea Link and the Great Grid Upgrade as a requirement to get to net zero by 2030, but carbon calculations are not provided in any of the consultation packs for the project.</p> <p>There is nothing in the Sea Link project plan about the carbon footprint or turbine blades and the problems with disposal, showing how easy it is to write plans and then fail to deliver them during a project.</p> <p>There is no mention of circular economies and sustainability of the wind farms in their current plan 2030 is not covered because</p>



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		the companies are not directly owned by NGET and 'having a commitment to work with' these companies is not showing the leadership that is needed. OFGEM has a responsibility to push the companies to work together.
<p>4.50 In the EAP, companies should describe how they will mitigate and improve the environmental impact of their networks. An EAP should encompass activities network companies intend to undertake in RIIO-3 to decarbonise their network and to reduce the wider impact of network activity on the environment. EAPs should explain the methodology that has been used to assess the environmental impacts of the company's network and business plan. The EAP should set out the following:</p> <ul style="list-style-type: none"> • Analysis of the significant environmental impacts arising from its network activity. • The opportunities and challenges for addressing material impact areas. • An options analysis to identify the value for money of initiatives to reduce its environmental impact. • Evidence that consideration of impacts is coordinated with the company's wider business planning processes and decisions. • Evidence that wider stakeholders have been involved in the assessment. • The company's long-term overall targets/objectives for the network's environmental impacts, beyond the RIIO-3 period. 		<p>We have evidence from the most recently completed NGET project in our area NEMO LINK Ltd (2013) of significant harm to the environment that has not been mitigated 5 years later:</p> <ul style="list-style-type: none"> • There was no security on the temporary bridge NGET constructed across the Stour despite multiple requests from the landowner. Children were jumping into the notoriously dangerous river from the bridge on multiple occasions. • Following removal of the bridge, the bank was damaged. Despite continual requests, repairs have not been made. This has contributed to significant and increased flooding of the fields. Over 25 requests for repairs have been made and ignored. • Trees were planted without permission or consultation and have been left with no aftercare. The success rate is appalling. • The entrance holes to barn owl boxes (in use) were taped up without permission to prove that there were no nesting barn owls present. • The trenching through the salt marsh has left a large



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<ul style="list-style-type: none"> • Include an assessment of the network's potential environmental impacts in RIIO-3 without intervention, in comparison to its current impacts. • Set out the role the company envisages playing in supporting the low carbon energy transition. • Set out the deliverables, outputs and environmental benefits the company proposes to deliver from implementing the EAP over RIIO-3. • Set out clear links between the impact areas it has prioritised in the EAP, the deliverables and targets in RIIO-3, and how these are linked to the company's long-term environmental targets/objectives. 		<p>scar even after 9 years. The 'garage pool' was previously brackish water, rather than saline, but damage to this area has caused it to become tidal and saline, changing a habitat overnight that has taken decades to create.</p> <ul style="list-style-type: none"> • In agreement with the landowner and the local conservation organisation who manage Stonelees National Nature Reserve, NGET agreed to install the HVDC cables from the NEMO scheme on top of the land and cover them with a chalk bund. In a condition from Thanet District Council, it was agreed that this would "marry with existing levels" and that it would be left to self-seed naturally, rather than be turfed and re-seeded. However, the material used for the chalk bund that was created bears very little resemblance to chalk. It no longer functions like chalk. The resulting material is a highly compacted, very poorly drained material that bakes solid in the summer and then turns into a slippery mess in the winter, which is the key reason natural colonisation of plants has been so poor. It certainly doesn't marry with existing levels and is a somewhat dangerous eyesore with zero environmental benefit. This is yet another example of



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		<p>NGET's cavalier attitude to environmental mitigation.</p> <ul style="list-style-type: none"> • Thanet District Council also issued conditions requiring follow up monitoring of the condition of the salt marsh. As far as we can tell from our requests to TDC, this follow up monitoring has not been undertaken. • The current plans for Sea Link will, we believe, require significant quantities of bentonite to lubricate the drill. As drilling will be under the water table, we are dismayed to see no mitigation for these activities.
4.51 A network company's progress against its EAP will be detailed in its Annual Environmental Report (AER). This will comprise of a commentary document and a key performance indicator (KPI) document, as described in our SSMD.		We have been unable to find an Annual Environment Report on NGET's website
4.52 EAPs should be developed taking into account the baseline expectations set out below. The baseline expectations reflect the minimum level of ambition we expect companies to demonstrate for individual areas.	The items below are taken from NGET's EAP annex:	-
<p>4.53 Network companies should:</p> <ul style="list-style-type: none"> • adopt or retain an appropriate science-based target to reduce their business carbon footprint (BCF); • commit to efficient and economic actions to reduce their controllable BCF in RIIO-3; 	<p>B4.6</p> <ul style="list-style-type: none"> ▸ Improve our circular economy maturity levels, reduce waste and recycle /re-use more content in construction <p>B4.9</p>	<p>As far as we can see NGET has no power to influence the carbon waste footprint of the wind farm generators.</p> <p>Turbine Blades at end of life need a solution. They are currently made of fibreglass and are being buried in land based tips or buried at end of life. A rush to wind-power when they have no control</p>



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<ul style="list-style-type: none">report on BCF scopes 1 and 2, and progress towards science-based targets and net zero, using the GHG Protocol Corporate Accounting and Reporting Standard; andreport on scope 3 emissions on the basis of the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard.	<ul style="list-style-type: none">Disclose our nature-related risks and opportunities, and work with other transmission owners and common supply chain to manage nature and ecological risks	<p>over this will nullify this claim. They must be held to account over this.</p> <p>Whilst so much of the Business plan is redacted, we can have no confidence in its trustworthiness.</p>				
4.54 Where BCF targets are being developed or reviewed, we expect networks to work alongside their ISG in developing science-based targets in alignment with the Science Based Target Initiative (SBTi) methodology.	<div>Page 82 of the business plan</div> <div>Building trust through data transparency</div> <div>Views from stakeholders and customers</div> <ul style="list-style-type: none">Feedback from DNOs, NESO and customers is that it is crucial for them to have access to open and accurate data and greater transparency around the connection process and pipeline to inform planning and decision makingCustomers and stakeholders told us at our pathway to net zero events they need data from all industry players, and data needs to be more accessible, and once published, the datasets must be accurate for practical use <table><thead><tr><th>Our commitments:</th><th>Success measure / target</th></tr></thead><tbody><tr><td>C4.4 Unlock the full value of our data assets across the business and develop our Data Sharing Infrastructure to foster increased whole-system collaboration</td><td>Achieve seamless data flow between NGET, Ofgem, and the wider energy sector through integration of the Data Fabric with the DSI by the end of second year of RIIO-T3</td></tr></tbody></table> <p>The level of redaction means we have no confidence NGET will deliver on SBTIs.</p>		Our commitments:	Success measure / target	C4.4 Unlock the full value of our data assets across the business and develop our Data Sharing Infrastructure to foster increased whole-system collaboration	Achieve seamless data flow between NGET, Ofgem, and the wider energy sector through integration of the Data Fabric with the DSI by the end of second year of RIIO-T3
Our commitments:	Success measure / target					
C4.4 Unlock the full value of our data assets across the business and develop our Data Sharing Infrastructure to foster increased whole-system collaboration	Achieve seamless data flow between NGET, Ofgem, and the wider energy sector through integration of the Data Fabric with the DSI by the end of second year of RIIO-T3					
4.55 Network companies should: <ul style="list-style-type: none">report on embodied carbon in new projects (projects beginning in the given price control period)	<div>Page 44 of the business plan</div> <div><div>Carbon reduction and compensation in construction</div><div>Low-carbon materials: Investment targeting primary carbon hotspots of the construction portfolio including aluminium, cables, concrete, diesel and steel. Carbon benefit: 10-15% reduction across the portfolio</div><div>Emerging opportunities: Investment targeting materials where there is less certainty of cost and availability, such as copper and cable. Carbon benefit: 25-35% reduction</div><div>Compensation: Our strategy is grounded in best practice principles, including additionality, monitoring and permanence, underpinned by investing in projects that deliver social and nature benefits, supporting our environment and communities in the UK, such as woodland creation projects and supporting energy retrofits of low-income housing. Carbon benefit: 730 - 2,500 ktCO₂e</div></div> <div>No carbon data has been provided for the important Sea Link project despite this being a push for decarbonisation. The data in the Business Plan is redacted.</div> <div>Additionally important calculations for the Sea Link project such as the value of marshland as a carbon sink are ignored. Without the data and given their past performance, we have no confidence that they are able or willing to deliver carbon reduction truthfully.</div>					
<ul style="list-style-type: none">set baseline and adopt a target for reducing embodied carbon on new projects during RIIO-3;	As above	Baseline is redacted				



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<ul style="list-style-type: none">• commit to collaborating with the supply chain on addressing challenges to reduce embodied carbon in the network;		A commitment to collaborating with the supply chain is not enough. Requests for information about the sustainability and plans for turbine blades have been ignored.
<ul style="list-style-type: none">• set out the materiality threshold (ie a £m value) for qualifying new projects that require reporting in this area.		We cannot find ‘materiality threshold’ mentioned anywhere in their Business Plan, which speaks volumes in itself.

In conclusion, we believe that NGET is a short term low cost options at the expense of the environment, the British taxpayer and the UK government. Ofgem must take a much more decisive role in driving the ‘great grid upgrade’ to ensure it delivers maximum value to the people and environment of the UK. We have the potential to create the blueprint of how to deliver a net zero strategy which is the envy of every other nation seeking to balance environmental with growth and energy demands. We have one chance to get this right.

Let’s not blow it.