**Submission to Ofgem’s call for evidence RIIO3[[1]](#footnote-2)**

a. Organisation: Pentrich Council

b. Commenting on National Grid Electricity Transmission’s (NGET) RIIOT3 business plan[[2]](#footnote-3)

c. Response is not confidential

d. Issues identified and e. evidence or justification, below, as follows:

We set out in this document our concerns that NGET’s business plan pledges are not reflected in reality, with examples below:

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| **NGET’s pledges to communities** | **Our experience with the Amber Valley section of the National Grid Pylon rollout project** |
| it is consulting with communities early in the planning process | Not true - NGET consulted after it had decided on a preferred option and discarded other options. This was clear in the meetings arranged when we were told the route from Chesterfield to Willington was already decided upon and only the routing within the chosen swathe was to be discussed. This is NOT what we had been led to believe. |
| We make changes to our proposals where possible and if we cannot, we explain why | The changes sought by stakeholders including local communities, parish councils, district councils, County Councils and MPs were:   * for HVDC under-grounding the entire route. This has not been investigated by NGET despite being technically feasible, popular, less harmful to the environment, less harmful to businesses including tourism and agricultural and potentially cheaper over the lifetime than pylons * For any other options such as T-Pylons to be considered * No-one to date has mentioned how things like SMNR’s (Small Modular Nuclear Reactors) could alleviate the need to push energy around the country from North to South, although Labour seems to have raised this very recently. |
| 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.  Digital (5.2). We enhanced our digital channels to improve customer experience by providing more information through the connections process. 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 | The staff we questioned at the initial meetings seems to be very junior and couldn’t answer anything we asked.  The only 3D tools available have been via a single screen at public information events, with no information to take away. This meant that only people who were able to attend an event could see the impact of the project. Given that the events were mostly during working hours and some at a distance from the route/communities, this severely restricted numbers who could understand the impact of the N2T project.  Further, some of the visualisations contained in the Statutory consultation pack were of an incredibly poor standard to the extent that 50m-high pylons were shown to be much smaller than trees.  There was limited information available and it did little to assuage any fears, in fact it exacerbated the situation negatively. |
| We aim to deliver the highest standards of public consultations and community relations so we can develop infrastructure proposals that are shaped by local input and create a greater level of community acceptance | We have consistently asked for a more holistic set of thinking to be used and for greater engagement with ourselves, this hasn’t been forthcoming to date  There is no community acceptance of the N2T proposal as presented. Community relations have gradually degraded and are now very negative |
| We try to make it convenient and easy for local communities to find out about our planned network upgrades and to tell us what matters to them | NGET has made it very difficult for people. The majority of the drop-in events were during working hours. Many of them were far from affected areas. Many were accessible only by car. Answers to questions were hard to come by.  Staff appeared to have limited knowledge and were incredibly guarded over anything we asked. |
| Online webinars, community update newsletters, social media advertising, consultation documents and information in local libraries, briefings for parish councils and elected members, one-to-one stakeholder briefings, telephone call-backs and language translation where necessary, really help we reach as many people as possible in the community | Many of the documents has several inconsistent revisions that were sent to ourselves, the statutory response forms completely missed our locale in its early drafts even though Pentrich is squarely in the middle of the proposed swathe. Even though Pentrich is a site of historical significance.  We have seen little of the many features NGET mentioned regarding enabling communications.  Many of the packs / docs sent to ourselves required responses in very short time frames and the documents were large, and required a great deal of research to gain an understanding of. This seems a deliberate attempt to obfuscate the data presented. |
| Building trust through data transparency C4.4  Customers 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 | * Redacted data in business plan; * Non-publishment of Investment Decisions Pack, Engineering Justification Papers and CBA with the business plan for stakeholder scrutiny; * Refusal of NGET to share risk register * Refusal to share any detailed costings of the solution proposed even though the chosen solution is NOT the cheapest option and may well become much more expensive over time if any of the residents requests are considered * NGET’s media spokespeople are often economical with the truth, for example, regularly stating that government policy requires them to build pylons and that under-grounding costs anything from 4 to 14 times the cost of overhead lines. When asked for more up to date data to be used for costings this was not forthcoming. Requests for information from Ofgem did enable ourselves to show that under-grounding could be much cheaper than suggested in NGET’s analysis. |

1. <https://www.ofgem.gov.uk/sites/default/files/2024-12/RIIO-3_Call_for_Evidence.pdf> [↑](#footnote-ref-2)
2. https://www.riiot3.nationalgrid.com/document/30069/download [↑](#footnote-ref-3)