

Received 10 February 2025

Dear FWP Team,

We welcome the opportunity to respond to this consultation and we note that Ofgem is seeking views on whether:

you are proposing to tackle the right set of problems in the sector

if anything major is missing, and any sense of the relative priorities between different problems.

And we note that Ofgem's strategic priorities are:

Shaping a retail market that works for consumers

Enabling infrastructure for net zero at pace

Establishing an efficient, fair and flexible energy system

Advancing decarbonisation through low carbon energy and social schemes

Strengthening Ofgem as an organisation.

Our submission is based on our experience in East Anglia of dealing with Ofgem.

We do not believe that Ofgem is addressing the problems in the sector and we believe that the relative priorities are wrong and need to be addressed.

Ofgem has been unwilling to take on board community concerns about the impact that a transmission operator (in this instance, National Grid Electricity Transmission) is having on consumers, communities and the environment.

Consumers and communities (and the environment, which has no-one to speak for it) need Ofgem to require NGET to be transparent, to appraise projects using the Treasury Green Book and to consult on alternatives which are presented to stakeholders on a like-for-like basis.

Instead, we have seen throughout our nearly three year campaign that Ofgem takes at face value proposals submitted by NGET, despite concerns raised by us.

Ofgem has not been acting as a regulator. It has been acting as a facilitating partner to NGET.

This means that consumers will be exposed to higher and higher bills over the years. This is firstly because Ofgem refuses to insist upon cost-saving coordination of infrastructure offshore. The total cost to consumers of this in the North Sea alone, at 2020 costs, is £2billion.

Secondly, because Ofgem refuses to analyse NGET's Norwich to Tilbury pylons submission, it is allowing NGET to progress with a project which does not include huge costs such as biodiversity net gain, community benefits, Green Book compliant contingency and full compensation. This allows NGET to claim that other project costs are seemingly much higher than they are in reality.

Thirdly, nor is Ofgem looking at comparable projects such as Hinkley overhead lines, which show that the N2T project is suspiciously cheap, or Eastern Green Link 3/4 in which NGET state that HVDC underground and sub-sea has lower lifetime costs and will be quicker and less risky to deliver than overhead lines.

Ofgem is failing consumers now and in the future. It is failing to deliver infrastructure fit for the future. It is failing to regulate and instead facilitating a deeply unpopular, expensive and harmful project which will be mired in delay in the courts

NGET must be held to account.

Yours faithfully

Mr P J Brown