

## Annex 01 – Greater Manchester Combined Authority Response to Consultation.

Question	
1	What are your views on the principles (in paragraph 2.8) to guide NESO's approach to developing the RESP methodology? Please provide your reasoning.
Response	<p>We agree with the core principles outlined in paragraph 2.8, as they represent a clear recognition of the critical role local actors play and emphasise a place-based approach. This focus is essential for the development of the RESP methodology, ensuring that the unique needs, strengths, and challenges of different regions are fully considered. In Greater Manchester, we have sought to overcome this place-based considerations through the development of LAEPs across the city-region. These aim to provide the level of local insight to enable delivery of our 2038 carbon neutral target and decarbonisation ambitions.</p> <p>Whilst we find the principles comprehensive, we acknowledge that there is greater clarity for some energy vectors than others. This disparity should not hinder action or result in an optimism bias, where assumptions are made that "if X happens, then Y will follow." The methodology needs to be effective both in the immediate and medium term.</p> <p>Place-based growth ambitions should also be a consideration. Any RESP needs to fit into this context for it to be adopted and maximised as part of wider development plans for an area. In particular, a multi-vector approach is fundamental to this process, considering the energy needs and development across the spectrum to decarbonise and grow local areas simultaneously.</p>
2	Do you agree that the RESP should include a long-term regional vision, alongside a series of short-term and long-term directive net zero pathways? Please provide your reasoning.
Response	<p>We broadly agree that the RESP should include a long-term regional vision alongside a series of short-term and long-term net zero pathways, as this provides a structured and forward-looking approach to achieving climate goals. However, several considerations must be addressed to ensure this approach remains effective.</p> <p>If RESPs are to be truly regional then they should reflect regional, not national, targets. Therefore there should be consideration given to accelerated delivery pathways where the local targets exceed the national ambition, understanding the particular local barriers and challenges that exist and how these could be overcome.</p> <p>One concern is how sub-regional differences, which may conflict with one another, will be managed. Different regions may have distinct timelines, e.g. our target for Greater Manchester is carbon neutrality by 2038, and it will be important to understand how these variations will be incorporated without creating inconsistencies. In addition, RESPs will need to tie into sub-regional areas to have an impact as Mayoral CAs will be implementing single settlement devolution agreement outcomes which will have an impact on delivery of outputs that the RESP is aiming to address. We would suggest that, given such anticipated differences to consider, Ofgem provides NESO with case studies of such differences and how they might be resolved in a RESP. This could be</p>

	<p>extended to other anticipated areas of conflict that the RESP might need to try to resolve.</p> <p>Additionally, we question whether Lower Super Output Areas (LSOAs) are the appropriate level of granularity for this work. It might be that greater granularity is needed where decisions need to be taken around electricity sub-stations or gas connections. It could also hide some issues in dense urban areas where requirements may need to be assessed very granularly. There is also ambiguity around how many pathways constitute "multiple" and whether having too many options could dilute the certainty needed for investment, potentially leading to inaction. It may be that SOA level is more appropriate as a result, this could be the same in rural areas where LSOA is a sizeable area.</p> <p>The 25-year time horizon is another factor to consider—will it continue to extend beyond 2050, or will it gradually narrow as part of each refresh? A clear answer to this would provide greater clarity in planning. We also believe that the first target period should extend to 2030, aligning with the Government's electricity grid decarbonisation target.</p> <p>Given that the NESO/RESP will be responsible for consistency and provision of assumptions and inputs used for modelling the pathways, it is important that they take on responsibility for this when network organisations may then be held responsible for the outputs of this work when used.</p> <p>Finally, the Government's 2026 hydrogen decision will likely play a material role in shaping the direction of these pathways and should be considered as part of the broader strategy, especially considering that the first RESPs are proposed to be developed in 2026.</p>
3	<p>Do you agree there should be an annual data refresh with a full RESP update every three years? Please provide your reasoning.</p>
Response	<p>We believe the decision to refresh the data annually and conduct a full RESP update every three years should depend on several factors, including the type of data being pulled. Key considerations would be the availability and accessibility of this data, the effort involved in collecting and processing it, and the relative benefit of updating the data more or less frequently. Balancing these aspects is essential to ensure the process remains both efficient and valuable. It is important that the effort and resource needed to pull data resources from a local government point of view is considered as part of this.</p> <p>Electricity Northwest are already collecting data from the LAs and transport for Greater Manchester. It may be that this illustrates the role of the CA/DNO/LA in creating a system to obtain data or intelligence and example of how such a process can be established.</p> <p>Moreover, if the annual data refresh indicates that adjustments to the plan are necessary, it wouldn't make sense to merely update the data without revisiting the RESP itself. Leaving a full RESP update for another one or two years could result in misalignment between the data and the strategic plans. In cases where significant changes or trends emerge from the refreshed data, more comprehensive updates might be required annually to ensure that the RESP</p>

	<p>remains relevant and accurately reflects the evolving landscape. This would prevent any disconnect between the data inputs and the actions taken as part of the overall planning process. It may be that there could be partial refreshes also made annually to a RESP, for example if a major development happened that had a big impact on the local area (over a certain threshold) such as a data centre or significant growth areas, that create a big shift in the regional energy landscape.</p>
4	<p>Do you agree the RESP should inform the identification of system need in the three areas proposed? Please provide your reasoning, referring to each area in turn</p>
Response	<p>We agree that the RESP should play a role in informing the identification of system needs in the three proposed areas.</p> <p>Creating consistent assumptions across network companies, particularly in translating LCT growth projections into peak demand, would be helpful, as current inconsistencies in this process can lead to suboptimal planning. It is important though to distinguish accountability here as the network companies, through their plans, would ultimately then be held responsible by Ofgem to assumptions that are taken by the NESO/RESP, this needs to be made explicitly clear and perhaps provide a route to challenge such assumptions where the network companies' responsibilities are thought to be compromised. For example, if research indicated that there were local variations in attitudes towards factors which affected regional energy market development. It may also be that local differences in supply chains need to be considered for the delivery of work impacted on the RESPs, including end-use technologies such as heating systems.</p> <p>Providing a spatial view and mapping this against investment needs is also beneficial. We have held conversations around developments requiring electricity supply locally that would have benefitted from such planning and visibility of constraints. As above, we have a system in place in Greater Manchester with ENWL to provide a pipeline of investment locations/sites over the long term 10-15 years and short term 1-3 years. The development of RESPs offers an opportunity for improvements in the accessibility of data and linking this to other vector data sets locally, through digital twin concepts.</p> <p>In addition, the proposals suggest that RESP will be providing capacity while the DFES will manage load. As load shifting, such as the proposals for Greater Manchester's Local Energy Market, emerge more fully, there will be an increasing intersection between capacity and load. Accountability for this should be assessed continually as this part of the market and new products develop. Once identified capacity need has been identified, what happens next? Are DNOs obliged to prioritise the RESP's recommendations? These questions will need answering to ensure accountability and RESP intent.</p> <p>Finally, taking a more directive role in identifying strategic investments will help align with long-term regional visions, making the RESP's involvement in these areas sensible and necessary.</p>

5	Do you agree technical coordination should support the resolution of inconsistencies between the RESP and network company plans? Please provide your reasoning.
Response	<p>We support the principles and rationale behind technical coordination to resolve inconsistencies between the RESP and network company plans. However, some questions remain unanswered, such as how conflicts will be addressed when the NESO identifies gaps or inconsistencies. Clarification on who will be responsible for filling these gaps is important. A formalised process for resolving trade-offs and identifying whole-system opportunities will move coordination forward, but further details are needed to fully assess its feasibility. This should include a clear definition of the role of local government/Combined Authorities, giving sight of any inconsistencies and potential trade-offs being proposed that may impact local/regional ambitions. The current position is perhaps overly optimistic that disagreements between actors in this space will not emerge and there could easily be a scenario where the NESO has to resolve a lot of these technical inconsistency, which risks losing the benefit of localised insight and regional planning.</p>
6	What are your views on the three building blocks which come together to form the RESP in line with our vision? Are there any key components missing?
Response	No response
7	Do you agree with the framework of standard data inputs for the RESP? Please provide your reasoning.
Response	<p>We are pleased to see that LAEPs and local plans are included in the framework. There is a balance between the burden this will place on local government and the value it creates, but overall, it seems that there will be a good level of local government influence on the plans. This could mean that the RESP may almost function to decide the threshold for evidence of documents such as LAEPs and the quality of the inputs, this could lead to differences in how regions are dealt with depending on existing LAEPs and the resources to produce these, at the risk of losing insight at a level the RESP is aiming for in principle. In addition, confirmation of the timings for RESP publication would also be valuable here, consideration is needed locally to how the RESP will inform any future LAEP work, needing to refresh in time to be useful, but not too early that it becomes outdated or less valuable.</p> <p>Some data points, such as local and community energy projects, may be difficult to obtain, and other data like housing stock might be better collected at the national level. Industrial decarbonisation and energy use seem to be missing, which is a gap worth addressing. As above we have a system in place in Greater Manchester with ENWL to provide a pipeline of investment locations/sites over the long term 10-15 years and short term 1-3 years. We would ask that there is a duty of cooperation on data sharing and integration so we can build on their work and vice versa across the parties needed to input into the RESP.</p>
8	Do you have any suggestions for criteria to assess the credibility of the inputs to the RESP?

Response	Given that the majority of local data will be derived through the LAEP process, we feel that developing an accreditation process for LAEP methodology would be useful, ensuring that it adheres to specific quality parameters. Government sources tend to be the most reliable, avoiding industry bias, especially where reporting is legally mandated, such as the MCS from grant schemes. The LAs should have a role in sense-checking any data coming through, making sure that it is consistent with planning and growth priorities.
9	Do you agree with the framework for local actor support? Please provide your reasoning.
Response	<p>We agree that local government involvement is crucial to the RESP's success. The provision of training is positive, but it does not fully account for the time commitment required from local authorities. Local governments already face competing priorities, so without additional resources or funding, it seems unrealistic to expect the required level of participation. Clearer guidance on time commitment and the level of seniority needed (see Q12 for more detail on this) would be helpful, and funding to support these roles would make the framework more viable. We would suggest that this would need input from Heads of Planning/project/programme directors at LA/CA/TfGM level. As above, we have a system in place in Greater Manchester with ENWL to provide a pipeline of investment locations/sites over the long term 10-15 years and short term 1-3 years that may provide a useful example for this.</p> <p>Representatives need enough confidence to ask questions (training for energy markets was useful for the DSO CEG process for example) and could be replicated as a successful example. LAs need resource for data collection, energy planning, RESP governance and review. This will likely be spread across multiple roles, therefore an allocation to cover costs would be a suitable vehicle for this. There may also be an opportunity to pool resources at the CA level, where appropriate.</p>
10	Do you agree with the purpose of the Strategic Board? Please provide your reasoning.
Response	<p>The overall approach to establishing a Strategic Board appears sensible, providing a forum for collaboration and oversight of the RESP process. The inclusion of democratic actors, network companies, and other key stakeholders should, in theory, foster transparency and ensure that regional priorities are well represented. While we have some concerns regarding the Strategic Board's ability to effectively resolve certain conflicts, particularly when network companies are involved, we are looking forward to further work with Ofgem to assist with the development and delivery of this important aspect.</p> <p>Network companies have a significant stake in the outcome of the RESP, and their accountability to shareholders may make it difficult for them to reach compromised agreements, especially when these agreements could affect their financial performance or long-term business strategies. Given the potential for such conflicts, we believe there may be a need for a more formal conflict resolution process to manage situations where compromises cannot be easily reached. Anticipated case studies of such conflicts to act as guidance could be</p>

	<p>useful for this. Relying solely on the Strategic Board to resolve these issues may be unrealistic, especially when the interests of different parties diverge significantly.</p> <p>It is sensible that the National Electricity System Operator (NESO) retains the role of ultimate decision-maker, providing the necessary regulatory backing to implement difficult decisions within the RESP framework. NESO's central role ensures that there is a consistent and authoritative body overseeing the process, which can enforce decisions that align with broader strategic and regulatory objectives. This top-down oversight is important for maintaining alignment with national energy and decarbonisation goals, ensuring that regional disparities or disagreements do not derail the overall objectives. If the responsibility were to sit with each regional RESP Strategic Board, the idea of an unelected body telling NESO/Ofgem and DESNZ what can and should happen in an area without any liability seems risky and unlikely to materialise.</p> <p>However, there is a notable gap in how the Strategic Board will handle conflicts outside Ofgem's direct jurisdiction. For instance, if the RESP were to conflict with local development plans or spatial planning considerations, it is unclear how these conflicts would be resolved. Such issues could arise if local authorities have planning priorities that diverge from the strategic energy needs identified by the RESP. There is an assumption that the RESP will be useful for LAs throughout the consultation, but it must fit in the planning and development context for each area for this to be the case, otherwise there is a risk that the RESP just ends up sitting on a shelf for LA work. This is an area that warrants further exploration, and we suggest raising this issue for discussion. It is important to consider the potential implications of such conflicts, as they could impact the successful implementation of both energy and development plans at the regional level.</p> <p>It would also be useful to have greater clarity on who/what process determines where the balance between top down and bottom-up inputs is struck i.e. how far should the strategy in the RESP influence local development plans and how far should local development plans influence the direction of the RESP?</p> <p>In conclusion, while the overall framework and purpose of the Strategic Board seem well thought out, a clearer conflict resolution process, especially for issues outside Ofgem's remit, is needed. The inclusion of NESO as the final decision-maker provides much-needed regulatory authority, but additional mechanisms may be required to address potential conflicts involving local authorities planning roles or other cross-sector interests.</p> <p>Consideration is also needed around existing Boards that act in a similar way to this. For example, there is already a GM Strategic Infrastructure Board. There is an opportunity to build upon existing, rather than duplicating another board.</p>
11	<p>Do you agree that the Strategic Board should include representation from relevant democratic actors, network companies and wider cross-sector actors in each region?</p>

Response	<p>Yes, we are broadly supportive of the approach outlined. The proposed mix of representative organisations seems like it gives the potential to achieve what the RESP is aspiring towards. However, there are a few considerations which are needed alongside this.</p> <p>Wider cross-sector actors need closer definition. We think that there is value in having independent experts on the Strategic Board, or represented in the NESO sign off process, to ensure that there is technical expertise that does not have to represent shareholder interests, for example. This needs to be balanced with the size of the group (see answer to Q12). It may be that these experts could be assigned by the NESO rather than LAs/ CAs so there is equality of access to that independent expertise.</p> <p>It is worth noting that we are supportive of Combined Authority (CA) representation as relevant democratic actors for a region, but that for any adoption of a RESP this would need to then be disseminated and noted/signed off through the usual CA processes. In order for the output to be useful, LPAs would then need to be aware of and want to use the value presented in the RESPs to assist with decision-making about energy in each LA area. This process can often be lengthy, resource intensive and require dissemination resource too.</p>
12	<p>How should actors (democratic, network, cross-sector) be best represented on the board? Please provide your reasoning, referring to each in turn.</p>
Response	<p>Firstly, it is important to consider weighting of representatives and votes/governance arrangements. We support representation from Combined Authority areas where they exist, but if they are represented on the Strategic Board by one member and a Unitary Authority is also represented by one member, if they were to be given equal voting rights then this would not be proportionate to the populations being represented by each. The governance arrangements of the Strategic Board need to consider the population represented by members and be proportionate to this. The same could also be applied to network companies, where more than one exists for the same energy vector in a region for example.</p> <p>Secondly, the size of the Strategic Board needs careful consideration. There is a balance between representation, knowledge continuity and ability to contribute. Any bigger than around 12 people and it can become a struggle for such a balance to be struck. In addition to this, the frequency of the meetings will be important. A balance needs to be struck between meeting frequently enough to avoid revisiting previous topics as reminders vs taking up too much time and resource without making a meaningful difference, we would suggest that perhaps monthly meetings would be suitable for this initially, progressing to quarterly meetings thereafter. Creating consistency of knowledge around the table to actually be able to make decisions is going to be a challenge.</p> <p>It is noted that Ofgem expect good ‘appetite’ for engagement due to the benefits for local spatial planning and energy system planning integration. For this integration to happen, and benefit to be realised, it is needed that any RESP fits</p>

	<p>into the development plans for an area, acting as a complementary document to bolster these existing from local areas.</p> <p>Accordingly, it is important to have the right level of representation on both the working groups and Strategic Board from local government. We would suggest that, depending on the eventual structure of the working groups, this would require involvement from officers with detailed knowledge of the topics, to allow this integration and eventual usefulness; this would likely consist of officers working in the Place and Environment Directorates at GMCA, for example. To achieve sufficient scrutiny and input it is likely that representation at Director-level is therefore then needed on the Strategic Board. For clarity, the focus of the Environment Directorate consists of carbon neutrality, decarbonisation, biodiversity and the Place Directorate focusses on delivering new houses, investment zones/regeneration and aligning infrastructure, including transport.</p> <p>Engagement with both group levels needs to deliver a tangible benefit in terms of efficiency of engagement, for example saving time engaging with network companies, given resource constraints, but also in terms of assisting with energy planning across the local area and how this fits in to the wider picture.</p>
13	Do agree with the adaptations proposed for Option 1? Please provide your reasoning.
Response	<p>We fully support the North West having its own RESP region and the adaptations proposed for this. This is because The NW has a strong track record of working together, decision making and data is at the right level. The rationale outlined in the consultation document for this change is also supported, making sure that there are similar population sizes represented across the RESP regions.</p> <p>We also understand that while the North as a whole would be too big for this, we will still need to collaborate with parts of the north to achieve our shared ambition, and there may be a need to incorporate elements of those shared ambitions into the NW RESP (transport mainly).</p>
14	Do you agree with our assessment that Option 1 is a better solution than Option 2? Please provide your reasoning.
Response	While there is no material difference between Options 1 and 2 for the North West, we believe Option 1 has a stronger rationale across England and should be supported.
15	Do you agree a single region for Scotland is optimal? If you think a two region solution is better, do you agree the split should occur at the SSEN and SPEN DNO boundary? If not, please provide your reasoning and alternative option(s)
Response	No response