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**Citizens Advice's response to Ofgem's consultation 'Consultation on our minded-to decision and draft impact assessment on the initial findings of the Electricity Transmission Network Planning Review'**

Dear Ofgem,

Thank you for the opportunity to respond to this consultation.

We are supportive of the general approach set out by Ofgem. There are some areas where we wish to highlight concerns Ofgem should address in the detailed design:

- We encourage Ofgem to prioritise the development of the network user and wider stakeholder role in challenging the FSO to deliver additional value from the Centralised Strategic Network Plan (CSNP).
- We think negotiated settlement model with local communities and stakeholders is likely to be a powerful tool in improving the transparency, engagement and efficacy of the CNSP. This should be considered as part of the approach for considering the environmental and community impacts of new infrastructure.

We provide below our responses to the questions Ofgem have set out.

We look forward to continuing to engage on this important reform that will support a more strategically planned and accountable development process for transmission networks.

Kind regards

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Senior Policy Researcher  
Citizens Advice

**Question 1: Do you have any concerns with our minded-to decision?**

We have a concern that the Future System Operator (FSO) is being relied upon for diversity and innovation in efficient network design. We do agree that the FSO represents an important role as an objective decision maker and has scope for a more holistic and impartial view. We see a major risk is that the FSO will not be sufficiently challenged in its network design to pursue innovative and non-network solutions and deliver a more effective design approach than currently exists.

We welcome Ofgem's view that the FSO needs to work with others. However, Ofgem appears to perceive network design residing with either the FSO or TO, although it is not clear how the responsibilities will be divided at this stage. We would favour clarity over a dual approach that encourages innovation by TOs as proposers and FSO as the decision-maker. The Transmission Operators (TOs) have the expertise and market position to provide CSNP with proposals that drive the FSO process and quality design inputs will support the FSO in effective decision-making.

Given the issues highlighted around skills for the FSO being given a medium risk of occurring with high impact, it would seem sensible to have a formal dual role at least in transition.

We also want to see an indication of how to assure the FSO's performance over time in delivering quality in the CSNP. This requires transparency and iteration to show how the CSNP will be robustly challenged ahead of delivery if it is to be fixed for several years. This is a particularly important planning step as Ofgem is currently seeking approval without assessing the quantitative benefits of the approach.

**Question 2: Do you agree with how we have estimated the scale of load-related investments?**

We think this is an acceptable approach as an indicative measure.

**Question 3: Do you agree with the impacts of introducing the CSNP that we have identified? Do you think there are other impacts not currently addressed?**

We think the CSNP will complement other initiatives such as the development of the FSO, acceleration of transmission development, planning reform and reform of market arrangements including network charging.

A key deliverable is the transparency it provides to network users of the current and anticipated capabilities of the energy network. This visibility combined with locational price signals should support better demand location and management. We see it as vital that a collaborative local approach is taken in planning and designing networks. It is therefore critical that the CSNP is well connected to local area planning and distribution network requirements to ensure efficacy and support for design decisions. We welcome that Ofgem *'are seeking to address concerns around transparency at earlier stages in the planning process, such as when estimating future load'*.

**Question 4: Have we omitted any inputs, activities, outputs, or impacts that should be included?**

No response provided.

**Question 5: Have we included any inputs, activities, outputs, or impacts that should be omitted?**

No response provided.