

Energy UK  
120 Cannon Street  
London  
EC4N 6AS

RESP Team  
Ofgem  
10 South Colonnade  
E14 4PU

8<sup>th</sup> August 2025

Dear Ofgem colleagues,

### **Energy UK support for the Regional Energy Strategic Plan consultation on Licence Modifications**

Energy UK is the trade association for the energy industry, representing companies investing billions of pounds to secure our country's current and future energy needs.

From growing start-ups to major electricity generators, grid and infrastructure developers and energy suppliers, our members are driving change across power, heat, transport and flexibility. We provide a collective voice for the sector, working with governments, regulators, charities and other organisations to provide crucial insight that shapes policy, offers solutions and promotes best practice.

Our broad view across the whole system supports evidence-based positions which are not tied to particular technologies, and are focused on delivering strategic benefits for people, businesses and the economy.

Energy UK supports Ofgem's proposals for licence conditions for NESO, DNOs, and GDNs to deliver Regional Energy Strategic Plans (RESPs). These conditions should be delivered swiftly to ensure effective and timely implementation of national energy system planning.

As RESPs are a relatively new focus area for NESO and Ofgem, the licence condition may need to be adjusted to reflect any future needs as they emerge. Any amendments to the license should avoid future revision of RESP planning documents. A period beyond the suggested 28 days may be needed to ensure meaningful engagement with the consultation process.

Clear processes should therefore be established for how industry can contribute to the ongoing development of the license framework, particularly for stakeholders to raise concerns.

[www.energy-uk.org.uk](http://www.energy-uk.org.uk)

A route to recourse is needed to ensure local consumers and industry are not left without a voice in strategic meetings, particularly for local authorities with very disparate resourcing. Ofgem should clearly define the roles of different organisations (e.g. NESO, Ofgem, DESNZ) in ensuring industry alignment and resolving points of conflict.

Similarly, clarity is needed on what 'cross-sector actors' refers to. This should explicitly refer to emerging high-energy users on the demand side (e.g. data centres, freight electrification) and generators on the supply side.

Finally, the licence condition should not inadvertently lead to increased costs for consumers. In line with this principle, we suggest that requiring licensees to use 'all reasonable endeavours' represents a more proportionate and balanced approach. This would better serve consumer interests by avoiding the potentially higher costs associated with a stricter 'best endeavours' obligation.

If you would like to discuss this response with Energy UK or its members, please do get in touch.

Yours sincerely,

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