

We thank you for your time spent taking this survey. Your response has been recorded.

Thank you for taking the time to respond to this consultation on the transitional Regional Energy Strategic Plan (tRESP).

Important: Please submit only one response to this form per organisation. Please respond via text in the form; each text box has a limit of 20,000 characters.

To help us process responses more quickly and ensure consistency, attachments cannot be accepted or submitted via this form. Attachments will only be accepted by exception - if you wish to submit a request, please contact: <a href="mailto:box.consultations.resp@neso.energy">box.consultations.resp@neso.energy</a>

To help you draft your responses, a PDF copy of the consultation questions is here for reference. However, please note all final responses will only be accepted via this online form.

The purpose of tRESP is to help make the transition from the way that electricity and gas distribution networks are currently planned, to the new Regional Energy Strategic Plan (RESP) approach, which will be in place from 2027. tRESP is focused on supporting the process to set the ED3 price control for the electricity distribution network operators (DNOs).

If you have comments on topics outside the scope of this tRESP consultation, please look out for our consultation on the full RESP Methodology, which will be published in November 2025. Further details will be published on <a href="NESO.energy">NESO.energy</a> and in our newsletter <a href="here.">here.</a>

These questions are split into six sections:

- 1. About you / your group / your organisation
- 2. Your engagement to date with RESP
- 3. Context for the Nations and Regions
- 4. Pathways
- 5. Consistent Planning Assumptions (CPAs)
- 6. Strategic Investment Need (SI Need)

Responses are saved as you progress through the form, so you don't have to complete all questions at once. However, please note that they are only saved as you go to the next

**page of the survey.** You will be able to download a copy of your responses as a PDF at the end.

#### About you / your group / your organisation (mandatory questions)

1. What is your name?
Kate Ashworth
2. What is your email address?
Kate.Ashworth@wmca.org.uk
3. What is your role / job title?
Head of Energy Infrastructure – Energy Capital Team

4. What is your organisation name?

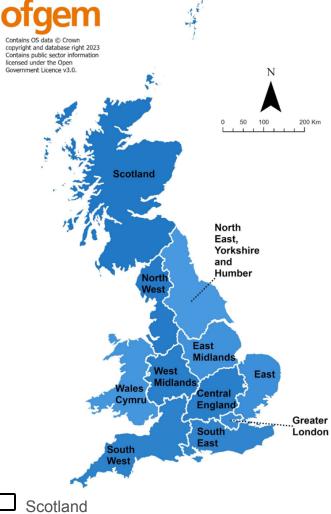
West Midlands Combined Authority

5. Please give a brief overview of your organisation:

The Energy Capital team's mission is to enable a just energy transition, where investment is appropriately channelled to meet the needs of our diverse communities, to enable timely decarbonisation and to create a thriving market for clean-tech innovation and economic growth. This will be achieved by working closely with the Energy Capital Partnership to enable, influence and deliver targeted regional programmes of activity, supporting both the delivery of the West Midlands Growth Plan, by ensuring investment in the region's energy infrastructure is planned effectively, and the regions Net Zero Strategy and ambition to decarbonise by 2041. This response has been prepared with the input from the Local Area Energy Planning Coordination Group which includes representatives from all Tier 1 Local Authorities and the wider non-constituent counties in the West Midlands Region.

6.	Which category best describes your organisation? (Select all that apply)
	1. Householder, community group or representative of a local community, inc. a local campaign group
	2. Local authority or a representative of local authorities
	3. Business or a representative of businesses
	4. Large energy user – e.g. industrial business, port, airport
	5. Housing or commercial developer
	6. Non-energy infrastructure provider – e.g. water, telecoms, transport
	7. National or GB-level campaign or interest group/organisation
	8. Network operator – distribution (electricity Distribution Network Operators (DNOs), Gas Distribution Networks (GDNs), independent Distribution Network Operators (iDNOs), Independent Gas Transporter (IGT) or trade association)
	9. Network operator – transmission (TOs, National Gas)
	10. Installer, operator or trade association for low carbon technologies e.g. EV chargers, heat pumps, solar, batteries, etc.
	11. Manufacturer of energy infrastructure equipment
	12. Flexibility provider inc. aggregators
	13. Renewable energy or storage project developer and/or operator
	14. Hydrogen producer
	15. Researcher, innovator, think tank or consultancy
	Other - please specify:

7. Which Nation or Region are you / your organisation located in, or interested in? (Select all that apply - for reference, a list of Local Authorities by nation / region is here)



Wales

Central England

East

East Midlands

**Greater London** 

North East, Yorkshire and Humber

North West

South East

South West

**West Midlands** 

8. Has your response been approved by your internal governance / approval process, where relevant?
<ul><li>Yes</li><li>○ No</li></ul>
9. Following your submission, are you happy to be contacted specifically in relation to this consultation, to further understand your views?
● Yes ○ No
10. How would you like us to treat your response?
<ul> <li>My response can be published</li> <li>My response is confidential - not to be published in an identifiable form</li> </ul>
Your engagement to date with RESP
1. Have you engaged with NESO on RESP before this consultation?
Yes - please explain how:
• Previous RESP consultations • Ongoing engagement with NESO through PRIDE to develop wider governance Further comment on RESP forums: The forums are a useful way of broadcasting NESO's process, but it needs to be one of a set of tools for engagement. Other modes should allow influence or challenge back into the hub to inform NESO's thinking. The Autumn RESP forum felt more like a briefing than engagement, but appreciated there was a promise to do something in person in Q2 2026.
Maybe - please explain how:
O No

<ul><li>Yes</li><li>Maybe</li><li>No</li></ul>
3. Do you feel the RESP Forums are an effective way to engage with you / your organisation?
<ul> <li>○ Strongly agree</li> <li>○ Somewhat agree</li> <li>○ Neither agree nor disagree</li> <li>○ Somewhat disagree</li> <li>○ Strongly disagree</li> </ul>
4. If you attended a RESP Forum before, which nation or region was it for? (Select all that apply)
Scotland Wales Central England East East Midlands Greater London North East, Yorkshire and Humber North West South East South West West Midlands

2. Are you planning to join the next RESP Forum in October 2025?

**Nations and Regions Contexts** 

1.	Are the Nations and Regions Contexts accessible, clear and easy to interpret? What
imı	provements would you like to see?
•	Yes - please suggest any improvements:
	Section 2 – Electricity transmission changes – could benefit from a map or pictorial to show what is planned here. Section 3 – Heat Networks. The London HeatMap model (linked below) is a more informative format in that it shows the major pipelines of existing heat networks, as well as future development / priority zones. It would also be helpful to present a 'heatmap' of heat demand, combining both gas and electricity demand estimates, in addition to separated out gas connection rates. Ideally, heat demand from gas (domestic and non-domestic) and electrified heat demand estimates should also be presented. This is essential for understanding the scale of heat use and the challenge to decarbonise it. If possible, major potential heat sources should also be included. Data is available from the British Geological Survey Geothermal Platform, as well as from DESNZ Waste Heat Mapping. https://apps.london.gov.uk/heatmap/ For heat pump installations, the data should go beyond that which is provided from MCS-registered heat pumps. Finally, should it be available, the latest National Zoning Model initial heat network zone areas should be included, with appropriate caveats noted.
0	No - please suggest any improvements:
	How well do the Nations and Regions Contexts reflect your understanding of your nation region?
0	Extremely well
0	Very well
	Moderately well
0	Slightly well
0	Not well at all

Maybe
We would appreciate being able to compare different regions and add context to the different layers. The context section is currently missing any reference to the West Midlands Combined Authority Regional Energy Strategy (signed off February 2025). https://www.wmca.org.uk/media/2mcjtntr/crt158863a-20241023-regional-energy-strategy-draft_v14.pdf Further comment on the Nations and Regions Context's understanding of our region: We would query whether it is intended to reflect only approved initiatives or those in planning stages too. For example, reference to the Coventry Green Power Park sites appears to be missing. Local Area Energy Plans – it should be noted that in the West Midlands we don't have these developed yet. We do have the PRIDE project which is currently developing 'LAEP-style' plans in a bottom-up approach, contributing to a 'patch work quilt', but this is not the same as a full LAEP. We aren't yet in the position to mark the homework of what is coming through the RESP.

3. Do you agree with the elements and topics included in the Nations and Regions Context

4. How do you envisage using the Nations and Regions Context(s)?

It is a useful section to identify potential risks around electricity transmission and power plant closures and view data from the Clean Power Plan (i.e. roll out of batteries, solar and wind compared to what is expected for the region). In the WMCA area we would look to use this section alongside our Regional Energy Strategy to inform local decisions on transport and other major capital investment projects. It would also potentially inform wider economic strategies.

5. Do you have any feedback on the data selected for the specific topics included for the Nations and Regions Contexts?

Yes – There is currently good inclusion of distribution connected technology, but we'd also like to see similar information on transmission connected technologies. For heat: • Major pipelines of existing heat networks should be included. • A 'heatmap' of heat demand, combining both real or modelled gas and electricity heat demand is missing. • Ideally, heat demand from gas (domestic and non-domestic) and electrified heat demand estimates should also be presented. • For heat pump installations, the data should go beyond that which is provided from MCS-registered heat pumps. For example, NESTA have produced an open data source of heat zones. • Finally, should it be available, the latest National Zoning Model initial heat network zone areas should be included, with appropriate caveats noted. • Clean Power Plan data ie Solar, Wind Turbines, Batteries – are these figures hard 'targets' in which case, we will need to consider how to break it up. These figures will be important for local authority planners. How many Wind turbines does the 9MW and 200MW equate to? • Data may also need to be considered in the context of the connections queue. Could we get data about the challenge to connect these so we can directly compare how hard it is to meet it.

6. Do you have any feedback on how the data was presented visually?

# Yes - please explain:

Yes - We liked the way the data visualisation emerges against the narrative. Most of it flows well, although there were a few bumpy points where maps not available and text in thin columns could be more widely spaced. Is there a recommended browser (we used Microsoft Edge)? It was not always immediately evident there were additional sections to the data until you continued scrolling but this became easier to navigate with practice. The Heat Networks map was very basic compared to some other publicly available platforms like the London Heat Map.

O No

7. What additional data do you think we should be considering either for tRESP or full RESP?

West Midlands Regional Energy Strategy https://www.wmca.org.uk/media/2mcjtntr/crt158863a-20241023-regional-energy-strategy-draft\_v14.pdf Pleased to see just transition being included, what metrics are being used to assess impact (could also relate to Strategic need themes)

### **Pathways**

'es - please explain:
flaybe - please explain:
Maybe – Because of the confusion around DFES vs strategic investment for RESP. Will there only be three building blocks considered – Batteries, PV and Domestic Hydrogen? We would be keen to see thermal and other energy storage included. Why are only EVs and domestic heat pumps considered in demand technology? Should this also include heat networks? It is unhelpful to equate hydrogen with electrification as for heating the steer has been strongly against this. We appreciate we are awaiting a clear steer and decision from Government, but it is unhelpful to have such diverging routes and lack of clarity particularly when this will be used to present data to non-energy specialists.
lo - please explain:
fill your organisation use the Pathways? If yes, which of the building blocks and for the purpose?  The second sec
t purpose?
t purpose? 'es - please explain:
res - please explain:  Maybe - please explain:  Maybe - See comment from previous question. We need to understand how pathways data
1

8. The purpose of the tRESP Pathways is to drive consistency across Distribution Network

Having data provided in GIS format would be preferred. We noted the map function appears to be powered by ESRI, which could allow some integration with other systems in use by the WMCA, but there may be licensing considerations to get full value.

## **Consistent Planning Assumptions (CPAs)**

for pur	ecasting as an input to DNOs' network impact assessment to create their business plans the ED3 period (2028-2033). Will your organisation use the tRESP CPAs for other poses? If so, for what purpose? Is the format of the CPA value workbook usable for this pose?
0	Yes
•	Maybe
	There are multiple questions here and it isn't clear which one to be responding yes/maybe/no. The value of Consistent Planning Assumptions is that different energy vectors will be able to make direct comparisons which should lead to a better whole systems approach. We would like providers of LAEP to apply the same consistent planning assumptions to provide direct comparison with their analysis products, however we are not in a position to say whether this is reasonable and whether the assumptions capture the wider benefits or disbenefits of certain technology choices.
0	No
	Are the definitions of the CPAs clear, as described in the tRESP methodology and ailed design document and the tRESP CPA value workbook?  Strongly agree - please explain:
0	Somewhat agree - please explain:
•	Neither agree nor disagree - please explain:
	We do not have the engineering expertise or in-house analysts to understand the implications of all the methodologies for all the technology types. When we commission work such as Local Area Energy Planning (LAEP) or energy infrastructure/utilities studies, we would want to have a detailed methodology that can be aligned to the inputs needed for RESP to ensure these can fed in directly.
0	Somewhat disagree - please explain:
0	Strongly disagree - please explain:

11. The objective of the tRESP CPAs is to drive consistency across DNO demand

13. Based on the methodology, do you agree with the values established as tRESP CPAs in
the value workbook? If not, are there any additional or alternative data sources which are
more appropriate? Answers should refer to specific CPA numbers e.g. EV01 and adhere to
these criteria:

- Be based on a reliable source
- Be relevant
- Be up-to-date
- Be location-specific
- Consider changes through time, and
- Consider weather and climate impact.

Reliability is quite subjective – tangible examples of what a reliable source does and doesn't look like would be helpful for us to understand the methodological standard expected of us.

14. Do you agree with the scope and granularity of the assumptions in the CPA value workbook, considering the materiality and complexity of implementation of a more detailed or granular approach? If not, can you provide evidence to support the use of a more or less detailed or granular approach? See the value workbook for an overview and further detail of the scope and granularity of the tRESP CPAs.

O	Strongly agree - please explain:
0	Somewhat agree - please explain:
	Neither agree nor disagree - please explain:
	See answer to Q12. We do not have the engineering expertise or in-house analysts to understand the implications of all the methodologies for all the technology types. When we commission work such as Local Area Energy Planning (LAEP) or energy infrastructure/utilities studies, we would want to have a detailed methodology that can be aligned to the inputs needed for RESP to ensure these can fed in directly.
0	Somewhat disagree - please explain:
0	Strongly disagree - please explain:

### **Strategic Investment Need (SI Need)**

This consultation sets out our emerging view of SI Need as part of the tRESP process. It includes draft narratives, hotspot examples, and spatial illustrations intended to test our developing approach and gather feedback that will inform both the final Q1 tRESP outputs and our full RESP framework. We are seeking views on several areas:

15. cle	Do you feel that the definition and framing of Strategic Investment Need (SI Need) is ar?
0	Strongly agree - please explain:
0	Somewhat agree - please explain:
•	Neither agree nor disagree - please explain:
	There remain ongoing issues around clearly defining what a 'strategic investment need' is, ensuring the evidence for this is clearly understood, and drawing a line against what is 'in development'. It probably needs more discussion than the previous tRESP RFI template and questions allowed.
0	Somewhat disagree - please explain:
0	Strongly disagree - please explain:

hav	ve set out, including the use of Strategic Value and Uncertainty as assessment criteria?
0	Strongly agree - please explain:
0	Somewhat agree - please explain:
0	Neither agree nor disagree - please explain:
•	Somewhat disagree - please explain:
	It isn't fully clear, but the SI Need section appears to be missing reference to the WMCA tRESP submissions sent in July, and presumably other regional submissions. The assessment criteria for what meets the bar to be considered strategic appears to be very energy system led. We agree with the criteria of uncertainty but think there is a sliding scale (rather than an in or out approach) as projects move through development cycles. Strategic value still seems very subjective and something that would need to be put to the RESP board to decide ultimately. It is not for the energy system in isolation to decide what is the right investment for a place. Pleased to see just transition being included, what metrics are being used to assess impact – and relating to all the other strategic themes.
0	Strongly disagree - please explain:

16. Are the emerging SI Need areas broadly aligned with the approach and framework we

$\bigcirc$	
	Strongly agree - please explain:
C	Somewhat agree - please explain:
	Neither agree nor disagree - please explain:
	Visually, it might be helpful – however the level of detail is very high level. Could there be an opportunity to expand on particular hot spots with further detail if the user wishes to know more? It would also be helpful to understand what makes up a hot spot, is it many small loads or a small number of large loads? What is the nature of the technologies envisaged? When are these loads looking to connect and ultimately what is the impact that having a hot spot in an area would have on the level of anticipated network upgrades?
C	Somewhat disagree - please explain:
C	Strongly disagree - please explain:
) 18.	Strongly disagree - please explain:  What level of geographic detail would be most useful in future versions? For example
8.	
8.	What level of geographic detail would be most useful in future versions? For examp
8.	What level of geographic detail would be most useful in future versions? For example Local authority boundaries
8	What level of geographic detail would be most useful in future versions? For examp Local authority boundaries Project-level details
	What level of geographic detail would be most useful in future versions? For example Local authority boundaries Project-level details Place-based clusters or zones
	What level of geographic detail would be most useful in future versions? For example Local authority boundaries Project-level details Place-based clusters or zones GSP (Grid Supply Point) boundaries
	What level of geographic detail would be most useful in future versions? For example Local authority boundaries Project-level details Place-based clusters or zones GSP (Grid Supply Point) boundaries Thematic areas (e.g. heat networks, industrial clusters)

17. Does the combination of RESP area narratives, maps, and hotspot descriptions provide

a clear and helpful picture of where emerging needs are arising? Is the level of detail

alig	gnment, investment proposals?
0	Yes - please explain:
•	Maybe - please explain:
	The outputs could help reinforce/test what is also being gathered through LAEP+ masterplan (or vice versa). It is helpful to see what has made the grade in terms of being assessed as strategic infrastructure. For these to influence local decision making, we would need to have more clarity around what the impact of being designated a hot spot would be in terms of accelerating connections. The hotspot data does not yet have any temporal data and therefore it is unclear if any result of this designation would improve waiting times for grid connectivity.
0	No - please explain:
cur	. Are there any locations you would expect to see identified as SI Need that are not rrently being assessed? Please highlight these and, where possible, provide supporting ormation.
	Yes - please explain:
	Yes - please explain:  We would expect to see more of the TRESP RFI submissions provided in July 2025 referenced. Supporting information is already provided.
0	We would expect to see more of the TRESP RFI submissions provided in July 2025
0	We would expect to see more of the TRESP RFI submissions provided in July 2025 referenced. Supporting information is already provided.
of t	We would expect to see more of the TRESP RFI submissions provided in July 2025 referenced. Supporting information is already provided.

You will be able to download a PDF copy of your responses on the next page.

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19. Do you see a role for these outputs in supporting local planning, infrastructure