

Investing for growth. Delivering responsibly. Strengthening communities.

RIIO-ED3: Our Emerging Thinking
2028 – 2033

INTRODUCTION

Every five years, Ofgem requires us to publish a business plan setting out how we intend to develop, operate and maintain our electricity distribution networks over the next regulatory period.

Our next five-year business plan, known as RIIO-ED3, covers the period from 2028 to 2033. ScottishPower became the majority shareholder in Electricity North West in 2025, bringing a third electricity distribution licence into our organisation. RIIO-ED3 will be the first business plan we have developed jointly, marking an important milestone in bringing our businesses together.

This booklet sets out some of our emerging thinking ahead of our full business plan in November 2026. It explains the context shaping our plan, shares our approach and invites further views before it is finalised.

The plan is being developed against a backdrop of change in several areas. Planning by the National Energy System Operator (NESO) anticipates significant growth in electricity demand and generation, a picture supported by our own regional forecasts and reflected in the plans we are developing. This means more electricity will need to flow through our networks, requiring additional capacity and changing how our networks are used. At the same time, we must

maintain the reliability and resilience consumers and businesses depend on, respond to increasing threats from climate change and cyber attacks, and deliver a significantly greater programme of investment despite pressures on supply chains and skilled resources.

The investment we are proposing will mean fewer and shorter power cuts, preparing more homes for electric vehicles and heat pumps, and a quicker, easier connections process. It will mean consistently better service, more tailored support for customers in vulnerable circumstances and networks better able to withstand the effects of a changing climate. We will also reduce the impact our activities have on the environment.

Our RIIO-ED3 plan is also a plan for growth. By investing in our networks, we create the capacity needed for new homes, businesses and industry, and support jobs, skills and supply chains across our regions. In doing so, we will contribute to the wider Electricity Networks Sector Growth Plan¹ and support the ambitions of the UK Government's Modern Industrial Strategy².

¹www.energynetworks.org/newsroom/energy-network-operators-and-manufacturers-set-out-collaborative-plan-to-shape-a-blueprint-for-national-growth

²www.gov.uk/government/publications/industrial-strategy

We must do this as well as keeping bills as low as possible. Affordability remains a pressing concern for many households, making it more important than ever that every pound we invest delivers value. This means controlling what we spend today while recognising that delaying necessary investment can increase costs over the longer term. We therefore need to invest efficiently, innovate and combine work where this delivers better value.

Developing our business plan requires us to balance a range of evidence and considerations. Consumer and stakeholder engagement provides important insight into what matters to the people and organisations we serve and can influence our approach where choices and trade-offs exist. We consider this alongside our technical and operational expertise, our regulatory policy, licence obligations, legal obligations and economic analysis.

Getting this balance right presents a significant opportunity. We want to support economic growth and the changing needs of our regions and ensure today's investment delivers lasting value. Our ambition is to leave future generations a network that is reliable, resilient and ready for their needs, while avoiding the higher costs that delaying necessary investment could create.

We welcome your feedback on our emerging thinking and proposals as we continue to develop our plan. Your views will help inform the choices we make before it is finalised, with details of how to provide your feedback at the end of this booklet.

WHO WE ARE

We operate within three electricity distribution licence areas: SP Distribution (SPD), SP Electricity North West (SP ENW) and SP Manweb (SPM).

Together, our licence areas form a continuous electricity distribution footprint spanning central and southern Scotland, North West England and North Wales, serving around six million homes and businesses. Understanding the different needs and priorities of the regions we serve is essential to how we are developing our business plan.

The regions we serve are diverse. They are home to world-leading universities, advanced manufacturing, major ports, chemical industries, digital businesses and emerging clean energy clusters. Our licence areas also span the jurisdiction of the UK, the Scottish and Welsh Governments and regional combined authorities each with their own policy priorities and ambitions for the energy sector. At the same time, the regions we serve face different opportunities and challenges, from supporting growing demand for electric vehicles and low-carbon heat to maintaining resilient networks across remote rural areas.

Our larger organisation combines shared strengths with a continued focus on regional needs. Every investment decision begins with an understanding of the communities, consumers and businesses we serve. Combining strong local knowledge with shared engineering expertise enables us to develop solutions that reflect the different opportunities, priorities and challenges across our three licence areas.



SP Distribution (SPD) serves central and southern Scotland.

Number of customers:
c.2 million



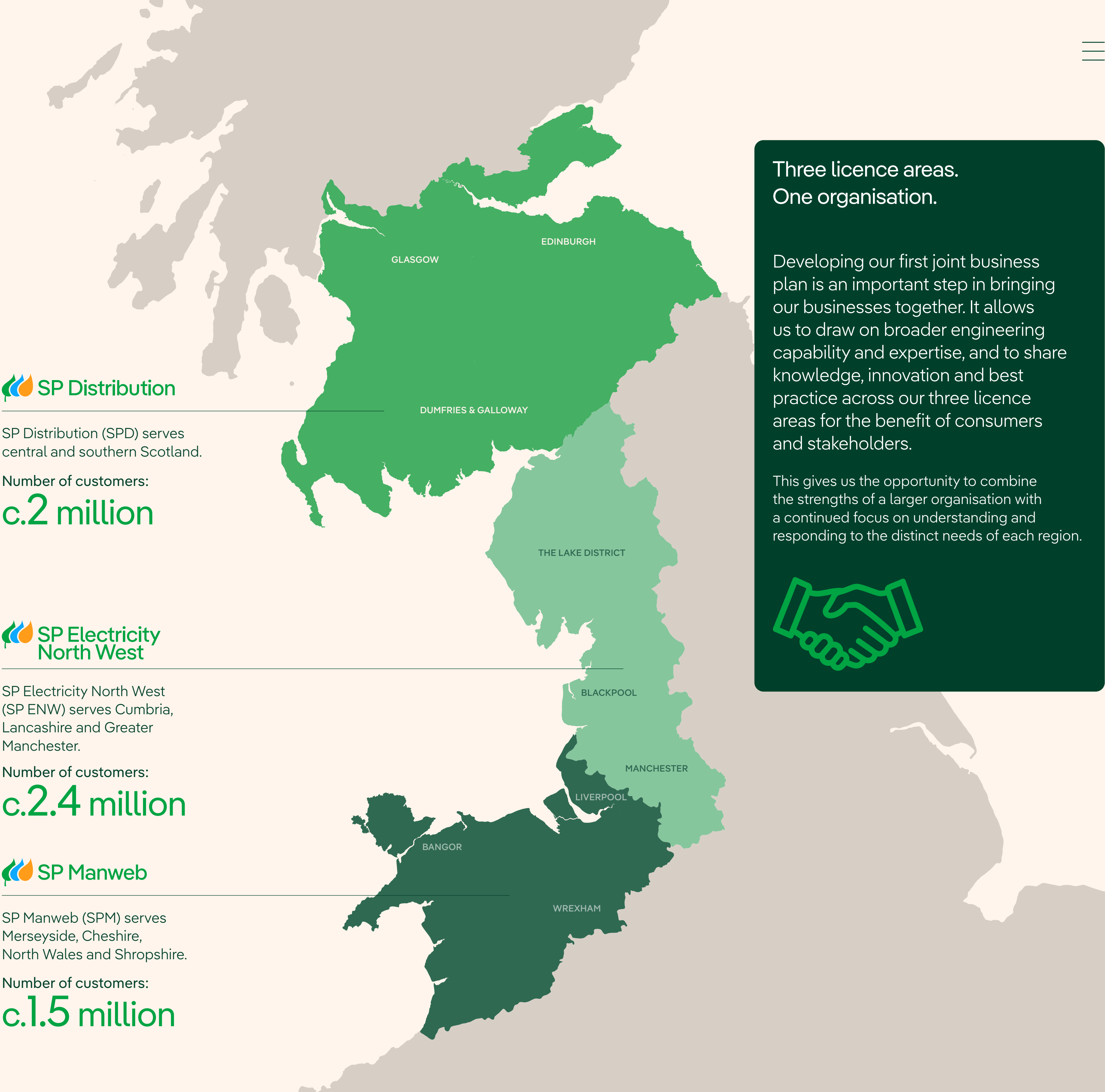
SP Electricity North West (SP ENW) serves Cumbria, Lancashire and Greater Manchester.

Number of customers:
c.2.4 million



SP Manweb (SPM) serves Merseyside, Cheshire, North Wales and Shropshire.

Number of customers:
c.1.5 million



OUR ROLE

The role of our distribution networks has changed significantly. They were originally designed mainly to carry electricity in a single direction – from large power stations, through the transmission system, into our distribution networks and on to homes and businesses.

Today, the electricity system is much more complex. More generation, including solar PV and wind, as well as battery storage, is connected directly to our distribution networks. Electric vehicles, heat pumps and new sources of demand are also changing how and when electricity is used.

This means electricity increasingly flows both to and from those connected to our networks. The networks themselves are also becoming more actively managed, using monitoring, data and new technologies to manage changing power flows and make better use of the capacity available.

Our role is therefore broader than moving electricity from one place to another. Amongst other things, we need to create capacity for new demand and generation, manage increasingly dynamic flows of electricity, make better use of existing capacity and enable flexibility.

Distribution networks are also critical to regional economic growth, enabling new homes, businesses and industry to connect and supporting investment in the communities we serve. Without the necessary capacity and capability, growth can be constrained and new development and connections delayed. Increasing demand and generation would also become harder to manage safely and efficiently across the electricity system.



What we do:

Keep the network safe and reliable
We operate and maintain the network 24/7 to keep the lights on and respond quickly when faults occur.

Invest and maintain our assets
We upgrade and replace equipment to improve performance and extend asset life.

Build resilience
We strengthen the network to better withstand severe weather and other environmental risks.

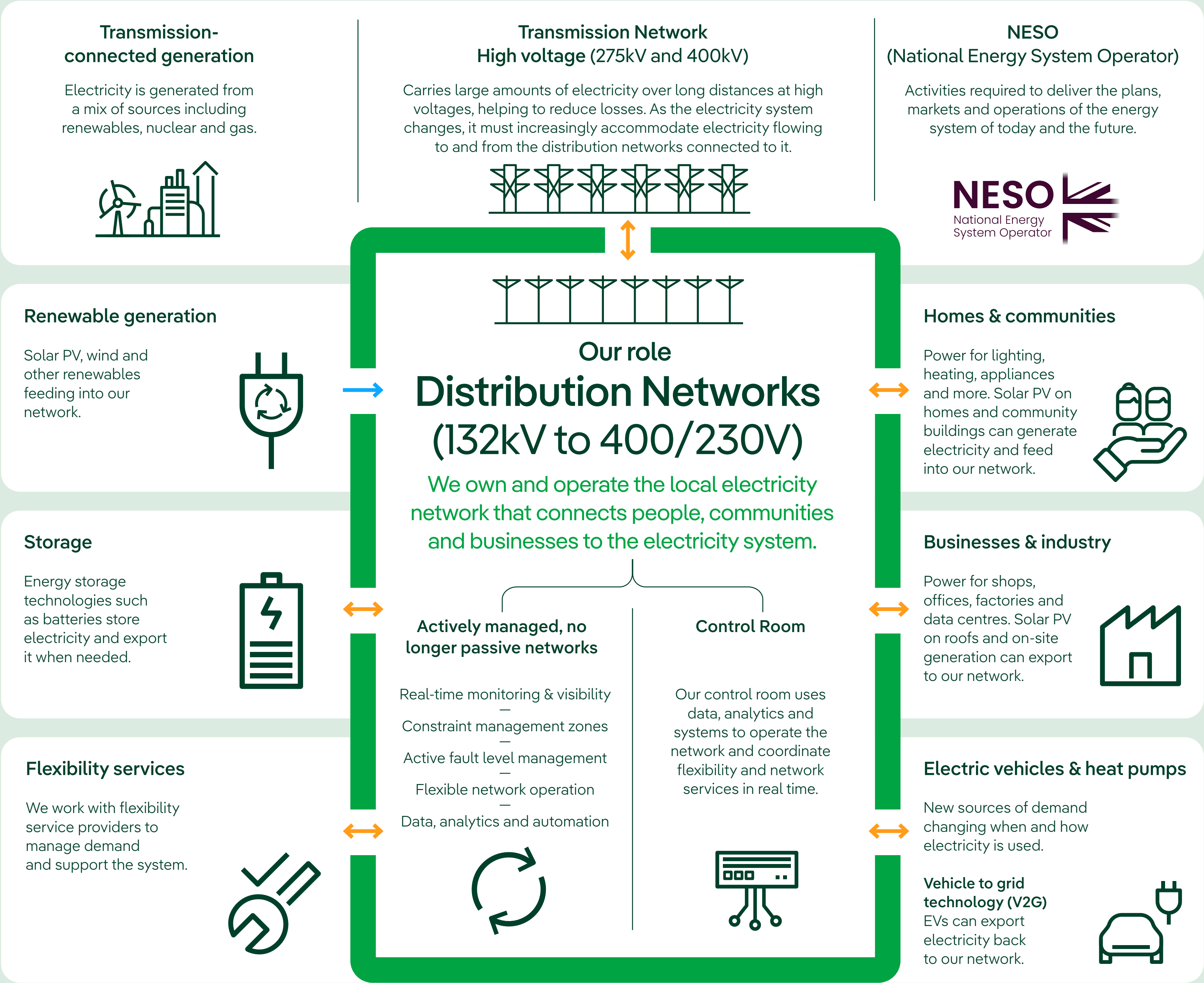
Support customers in vulnerable circumstances
We identify and support vulnerable customers, providing extra help and priority services when they need it most.

Drive innovation
We trial and adopt new ideas and technologies to solve problems and improve the way we work.

Use data and digitalisation
We use data and digital technologies to monitor the network in real time and make better decisions.

Work with our stakeholders
We work closely with consumers, communities, local authorities and industry partners.

Traditionally, distribution networks were designed to move electricity in one direction – from large, centralised power stations through the network to homes and businesses – with limited need to actively manage power flows. Today, increasing levels of generation connected to the distribution network and flexible use of electricity mean that power can flow in both directions and change rapidly. Real-time data, automation and flexibility help us optimise existing network capacity, manage constraints and fault levels, and maintain a safe and reliable network.



DEVELOPING OUR PLAN

How we are developing our plan

Developing our RIIO-ED3 business plan requires us to bring together a range of evidence and judgement. We have grouped these into five sources, shown opposite.

Each source has a role in shaping our plan, although the relative weight we give to the sources will vary across different parts of it. For example, where legal obligations require us to take a particular course of action, there may be little or no choice over what we must do. In other areas, we have greater choice over what we do, when we do it and how we deliver it.

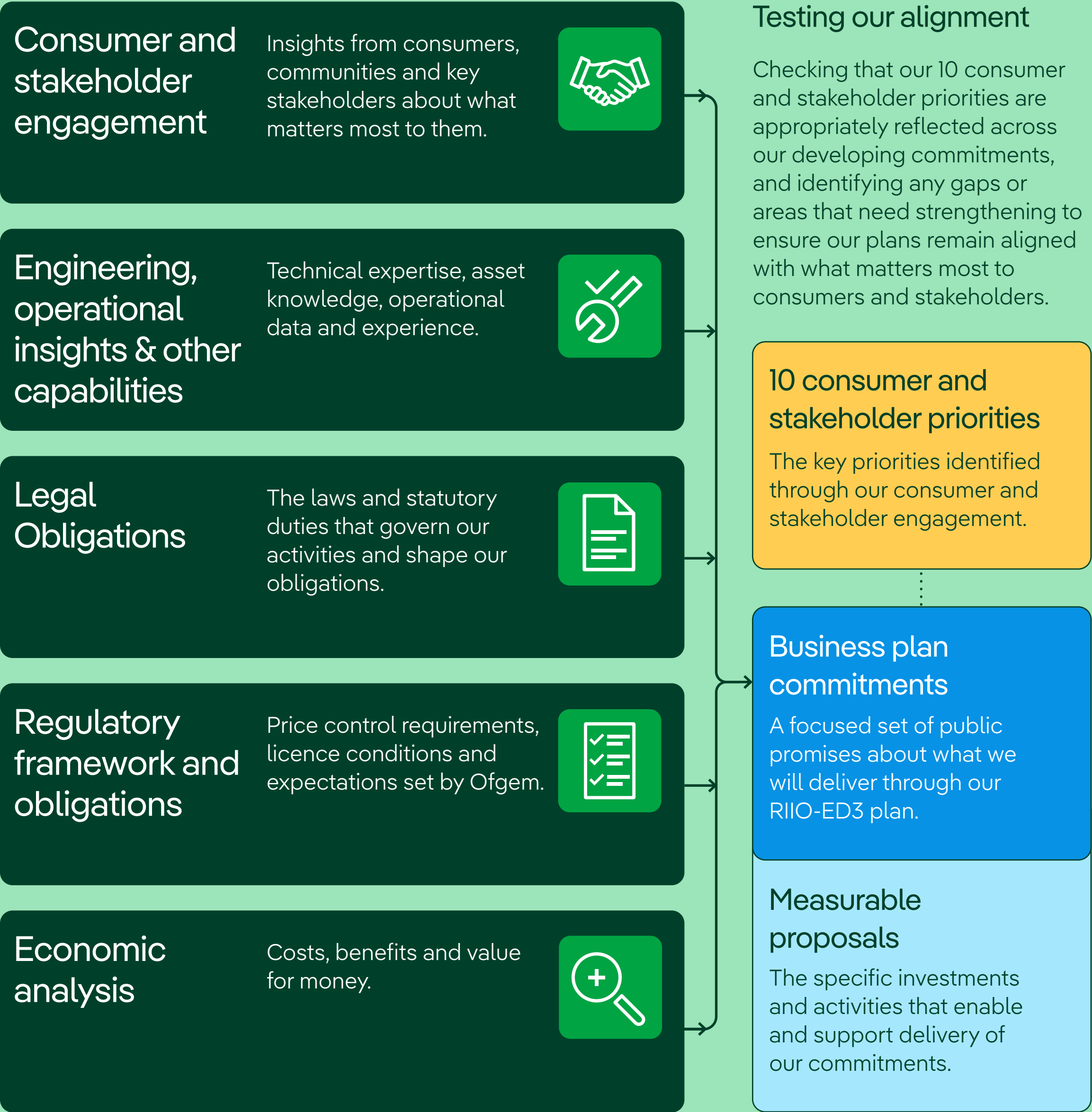
Together, these sources will shape our business plan commitments – the public promises we make about what we will deliver through RIIO-ED3 – and the measurable proposals that sit beneath them. The proposals set out the specific investments and activities that will enable us to deliver those commitments.

Our commitments and proposals are still being developed. On the following pages, we set out some of our emerging commitment areas and indicative proposals, which will continue to evolve as we work towards our final plan.

The 10 consumer and stakeholder priorities play a different role. We check that these priorities are appropriately reflected across our developing commitments, and identify any gaps or areas that need strengthening, to ensure our plans remain aligned with what matters most to consumers and stakeholders.



We draw on a range of evidence and judgement with five sources informing the development of our business plan:



CONTEXT

A change in how we plan

The way we plan our networks is changing, with greater emphasis on national and regional energy system planning.

For the first time, our five-year investment plan is being developed within the new strategic planning framework led by NESO. This means looking well beyond the five years of RIIO-ED3, taking a longer-term view of how the energy system and the needs of our regions could change out to 2050.

NESO’s transitional Regional Energy Strategic Plan (tRESP) sets out how electricity demand and generation are expected to grow across our regions. This matters because the scale and location of that growth directly influence the capacity our networks will need and, therefore, the investment we need to make. Increasingly, this requires us to plan strategically and coordinate with others across the energy system, using better data and analysis to inform where and when investment is needed.

Importantly, our own bottom-up forecasts of demand and generation are closely aligned with the projections set out in NESO’s tRESP. This gives us confidence that the investments we are planning respond to a credible view of future network needs.



The wider environment shaping RIIO-ED3

Electricity is becoming increasingly central to everyday life

- Transport and heating are becoming increasingly electrified.
- AI, digital services and data centres are driving new demand.
- Smart technologies are changing how consumers use electricity.
- Network capacity is key to unlocking regional economic growth, enabling new homes, businesses and industry to connect and expand.

What this means for RIIO-ED3:

We need to anticipate how our networks will be used and how we operate, manage and maintain them. This means planning further ahead and drawing on a range of evidence to make the right investments at the right time – including investing ahead of need where necessary.

➔

1.

A more coordinated energy system

- Clean Power 2030 is guiding the transition to a more decarbonised energy system.
- NESO is leading integrated system planning and operation.
- Regional Energy Strategic Plans set out regional pathways and priorities.
- Connections reform is prioritising projects ready to deliver for the system.

What this means for RIIO-ED3:

How we plan our networks is becoming more closely connected with how the wider energy system is planned. This requires greater coordination with others – including NESO, other network companies and regional stakeholders – and more rigorous alignment of the data, assumptions and systems that underpin our plan. This helps ensure that decisions made across the energy system are joined up.

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2.

Meeting changing consumer needs and keeping costs affordable

- Affordability and value for money remain critical as the scale of investment in our network increases.
- Consumer expectations are increasing, including around reliability, information, service and how networks support their future needs.
- Some consumers need additional, targeted support, particularly those in vulnerable circumstances.

What this means for RIIO-ED3:

We need to understand and respond to changing consumer needs and rising expectations. This means listening to consumers, recognising that their needs are not all the same and continually improving how we communicate with and serve them. Throughout this, affordability needs to remain a key consideration, alongside demonstrating that our investments deliver lasting value.

➔

3.

Resilience in a more challenging world

- More frequent and intense severe weather events.
- Evolving cyber threats increase operational risk.
- Supply chain constraints and global uncertainty persist.
- Demand for skilled people and expertise is high and growing.

What this means for RIIO-ED3:

We need to strengthen climate and wider network resilience as the risks we face continue to evolve. We also need to plan ahead for the people, skills and supply chain capacity needed to deliver a larger and more complex investment programme.

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4.

WHAT MATTERS

What matters to consumers and stakeholders

Understanding what matters to the people, businesses and communities our networks serve is an important part of developing our plan for RIIO-ED3.

To inform that plan, we are undertaking one of our most extensive programmes of consumer and stakeholder engagement, with engagement continuing as our proposals evolve. To date, we have engaged over 16,000 consumers and stakeholders, including:



Our programme combines consumer research, stakeholder workshops, advisory panels, bilateral engagement and collaborative industry research. We have also sought to ensure that a diverse range of voices is represented, including consumers experiencing fuel poverty, those with health conditions or additional communication needs, digitally excluded consumers, rural communities and future bill payers.

Rather than repeatedly asking questions where we already have strong evidence or have a regulatory or legislative obligation, we have focused new engagement on areas where there are genuine choices, gaps in our understanding or opportunities for consumer and stakeholder insight to influence our approach. Our Independent Stakeholder Group has provided challenge throughout, helping us test the quality of the evidence and the focus of our engagement.

What we have learned

Our engagement has helped us build a detailed understanding of what consumers and stakeholders value and expect from us during RIIO-ED3.

We have brought these together into 10 Priorities. They capture what consumers and stakeholders have told us matters most and provide an important lens through which we can test the plans we are developing.



Consumer and Stakeholder Priorities	What we consistently heard	Consumer and Stakeholder Priorities	What we consistently heard
1 Build the network consumers can count on – today and tomorrow	Reliable electricity supplies remain the foundation of trust, but consumers and stakeholders also want confidence the network is being prepared for future challenges such as climate change and electrification.	6 Open up data so everyone can plan with confidence	Consumers, communities and developers want accessible and timely network information to help them make informed decisions and plan for the future with confidence.
2 Deliver dependable service as standard – and when it matters most	Consumers judge us as much by the quality of service and support they receive as by network reliability itself, expecting clear communication and personalised help when they need it most.	7 Create jobs, skills and supply chains that power the transition locally	The energy transition should create tangible local benefits through jobs, skills and supply chain opportunities that strengthen regional economies.
3 Invest once, invest right – deliver efficiently and minimise disruption	Consumers want investment to be coordinated and delivered efficiently, avoiding repeat works and unnecessary disruption which creates lasting benefits for their communities.	8 Make smarter networks deliver real benefits consumers can feel	Consumers and stakeholders support smarter ways of operating our networks where they deliver tangible improvements in service, resilience and affordability, rather than technology or innovation for its own sake.
4 Keep bills as low as possible – and prove the value	Affordability remains a dominant concern, with consumers expecting investment to be justified, proportionate and fair, particularly for those least able to pay.	9 Deliver a fair transition – make sure no one is left behind	The benefits of the energy transition should be available to everyone, with additional support for those in vulnerable circumstances, fuel-poor and underrepresented communities.
5 Unlock connections and remove the barriers to growth	Stakeholders consistently identified connection times, uncertainty and lack of transparency as barriers to investment, development and decarbonisation.	10 Put communities at the centre – listen first, then plan	People want to be involved early in our decision-making and see clear evidence that their views have influenced priorities, plans and investments.

How we use these priorities

The 10 Priorities provide a lens through which we can test whether our developing plan reflects what consumers and stakeholders have told us matters most. Not every Priority will be relevant to every part of the plan.

The next section explains the wider evidence and judgement we draw on to develop our plan, and how we use the 10 Priorities to check its alignment with what we have heard.



DEVELOPING OUR PLAN

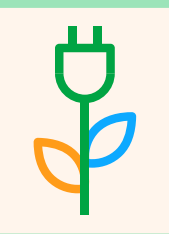
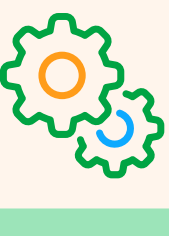
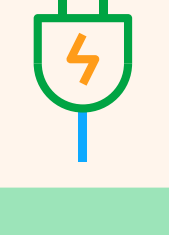
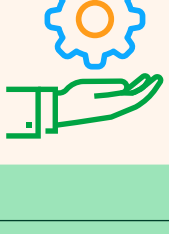
Emerging commitment areas

Bringing together the different sources of evidence and judgement described on the previous page is helping us identify the areas in which we expect to make commitments through our RIIO-ED3 business plan.

We call these our ‘emerging commitment areas’. These areas are still evolving and do not yet represent the full set of commitments we expect to make in our final business plan.

They are also not yet the specific, measurable commitments that will appear in our final business plan. We have shared and tested these emerging commitment areas through recent engagement and welcome further feedback as we continue to develop them.



Emerging commitment areas	Our direction of travel	Aligned consumer and stakeholder priorities
 A network safe for everyone	Continue to improve public safety by targeting investment at the areas of greatest risk and addressing equipment that could present a hazard to the public.	1
 Helping every home and business go green	Prepare our networks for growing use of electric vehicles, heat pumps and other low-carbon technologies, making it easier for consumers and businesses to make the switch when they are ready.	1 7
 Fewer and shorter power cuts	Improve network reliability so that power cuts happen less often and, when they do occur, supplies are restored more quickly, with particular focus on those experiencing the poorest service.	1
 A network built for the future climate	Strengthen our networks against the increasing risks from severe weather, heat and flooding, investing today to improve resilience over the longer term.	1
 Fast, simple and transparent connections	Make it quicker and easier to connect to our networks, with clearer information and greater transparency throughout the connections journey.	2
 Service that sets the standard	Provide a more proactive and consistent service across our three licence areas, making it easier to get information and support through the channel that works best for each customer.	3 4 6 9
 No community left behind	Provide additional support for those who need it most, including during power cuts, and help ensure that consumers in vulnerable circumstances can participate in the transition to cleaner energy.	5 8 10
 A cleaner, greener, more sustainable nature-positive network	Reduce the environmental impact of operating and developing our networks, cutting emissions and pollution while delivering positive outcomes for nature.	10

1. Build the network consumers can count on – today and tomorrow

2. Deliver dependable service as standard – and when it matters most

3. Invest once, invest right – deliver efficiently and minimise disruption

4. Keep bills as low as possible – and prove the value

5. Unlock connections and remove the barriers to growth
6. Open up data so everyone can plan with confidence

7. Create jobs, skills and supply chains that power the transition locally

8. Make smarter networks deliver real benefits consumers can feel

9. Deliver a fair transition – make sure no one is left behind

10. Put communities at the centre – listen first, then plan

From emerging commitment areas to proposals

Our emerging commitment areas are the starting point for the business plan commitments we will make. As our plan develops, and as further engagement is undertaken, they will help shape a final set of specific and measurable public commitments about what we will deliver during RIIO-ED3.

Our commitments will be underpinned by measurable proposals setting out the investments and activities through which we will deliver them. These proposals sit across the different strategies and plans that make up our RIIO-ED3 business plan.

The following section provides an early view of some of these proposals. They represent only part of our developing plan and will continue to evolve as we complete our analysis. We welcome your feedback as we refine them ahead of our final business plan.



What this could mean in practice

Our emerging commitment areas indicate where we expect to make commitments in our final business plan. The following pages bring some of these to life through examples of investments and activities we are proposing.

These are a selection of our developing proposals rather than a complete account of our plan. Where sufficiently developed, we have included an indication of their potential scale. Our final business plan will set out the specific and measurable commitments and proposals against which our progress during RIIO-ED3 can be assessed.

We welcome your feedback on these proposals as we refine our plan.

A network safe for everyone



Keeping our networks safe

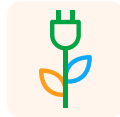
What we're proposing
Continuing to invest in the safety across our business, investing in our networks, working practices and capabilities to protect our people, contractors and the public and to manage safety risks effectively.

What this could mean
Maintaining high standards of safety as we increase the scale and complexity of our investment programme, while continuing to strengthen our safety culture and keep our people, contractors and the public safe.

Indicative scale
Deliver up to 40 schemes to underground overhead lines or divert them away from high-risk recreational sites such as playing fields and parks, reducing the risk of inadvertent contact incidents.



Helping every home and business go green



Capacity ahead of need

What we're proposing
Invest in our networks so that capacity is available when and where it is needed, informed by regional forecasts and local needs. We will consider anticipatory investment alongside flexibility and other alternatives to conventional reinforcement.

What this could mean
Our networks are better prepared for growth, reducing the risk that insufficient electricity capacity becomes a barrier to new homes, businesses, low-carbon technologies and regional economies.

Indicative scale
By the end of RIIO-ED3, no more than 4.5% of primary network substations would be constrained.

Preparing homes for electrification

What we're proposing
Increase the capacity available to homes as electric vehicles, heat pumps and other low-carbon technologies become more widely adopted.

What this could mean
More households can adopt low-carbon technologies when they choose to, without the local network becoming a barrier.

Indicative scale
More than 130,000 shared connections separated.

Better use of network capacity

What we're proposing
Use flexibility, improved monitoring and more active network management to make better use of the capacity already available on our networks and help us identify where conventional reinforcement can be avoided or deferred.

What this could mean
More capacity made available to support electrification and growth, helping us to deliver investment.

Indicative scale
c.£500m of reinforcement could be deferred.

Fewer and shorter power cuts



Improve network reliability

What we're proposing
Target investment to improve day-to-day reliability, reducing both the frequency and duration of interruptions and focusing additional attention on customers experiencing the poorest levels of service.

What this could mean
Fewer consumers experience power cuts, supplies are restored more quickly when faults occur and the gap between the best and poorest levels of reliability narrows.

Indicative scale

- 10% fewer customers experiencing unplanned interruptions
- 10% improvement in average interruption duration
- 7,500K+ worst-served customers targeted

A network built for the future climate



Strengthening climate resilience

What we're proposing
Use improved climate modelling, forecasting and asset intelligence to understand how acute hazards such as storms, flooding, heatwaves and wildfires, as well as longer-term changes in climate, could affect our networks. This will help inform our investment, asset standards and operational preparedness.

What this could mean
A network better able to withstand the changing conditions it may face over time, while acting today where doing so can avoid greater costs in future.

Indicative scale
Reduce the risk of faults in the summer through the targeted removal of around 300 ageing cable joints identified as particularly vulnerable to high temperatures.



Fast, simple and transparent connections



Improving the connections experience

What we're proposing
Create a more consistent connections experience across our three licence areas, with better pre-application support, clearer information and greater visibility throughout the connections journey.

What this could mean
Homes, businesses, developers and generators have greater certainty about their connection and can make investment decisions with greater confidence.

Indicative scale
Enable customers to track the real-time progress of all connection applications using digital tools by the middle of RIIO-ED3.



One proactive service for every customer



Faster, better resolution

What we're proposing
Provide a more proactive and consistent service across our three regions, making it easier to get information and support through the channel that works best for each customer.

What this could mean
Customers receive timely information and support, with issues resolved quickly and effectively.

Indicative scale
One SPEN customer service model across all three licence areas from the start of RIIO-ED3, combining technology and human support to anticipate needs and resolve issues more quickly.

No community left behind



Reaching and supporting consumers who need us

What we're proposing
Increase Priority Services Register reach and improve the quality of the information we hold, allowing us to identify needs more effectively and provide increasingly targeted and personalised support.

What this could mean
More eligible consumers are known to us before something goes wrong and receive support better tailored to their circumstances.

Indicative scale
90% PSR coverage of eligible households.

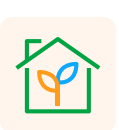
Tackling fuel poverty and widening participation

What we're proposing
Expand support for consumers in or at risk of fuel poverty and provide tailored help for those who may otherwise struggle to access or benefit from low-carbon technologies.

What this could mean
More consumers receive practical help with affordability today while being better able to participate in the transition to cleaner energy.

Indicative scale
300,000 fuel-poverty support services.

A cleaner, greener, more sustainable nature-positive network



Reducing our environmental impact

What we're proposing
Reduce the environmental impact of operating and developing our networks through action on carbon emissions, pollution, resource use and nature.

These areas correspond closely to the four environmental themes in the RIIO-ED3 framework: climate mitigation, pollution and nuisance reduction, responsible resource use and supporting nature.

What this could mean
The expansion and renewal of our networks supports the transition to a low-carbon economy while reducing the environmental footprint of the network itself.

Indicative scale
Remove up to 115km – around 20% – of the oil-filled cable on our networks during RIIO-ED3, as part of our longer-term commitment to remove it all by 2045.



WHAT HAPPENS NEXT

Developing our RIIO-ED3 business plan is an ongoing process and we will continue to evolve our thinking ahead of final submission to Ofgem in November 2026. Ofgem will then assess our plan, with its final decision expected in November 2027 and RIIO-ED3 commencing in April 2028.

This document is part of that process. We want to hear your views on the emerging commitment areas and indicative proposals we have shared. Your feedback will help us understand where we have got it right, the elements of our plan that still need work and what else we should consider.

In September, we will host an online survey to test our emerging commitment areas.

You can tell us what you think about the contents of this document, find out about our September consultation and see other ways to get involved using the links opposite.

Alongside this, we will engage with regional government bodies and growth deals, reflecting the evolving devolution landscape and the growing role of regions in shaping economic and infrastructure priorities.

Tell us what you think

We welcome your feedback on the emerging thinking set out in this document.

We will also be sending a survey to registered stakeholders in September, giving you another opportunity to comment as our business plan develops.

If you would like to provide your views to us or take part in our survey, please contact either of our teams by email and they will be happy to help:

SP Electricity North West: stakeholderengagement@enwl.co.uk

SP Energy Networks: stakeholderengagement@spenergynetworks.co.uk

Get involved in other ways

Attend one of our stakeholder events, register as a stakeholder or even share your views directly with the teams shaping the plan.

If you are in Central and Southern Scotland, Merseyside, Cheshire, North and Mid Wales or North Shropshire please visit the SP Energy Networks [engagement page](#).

If you are in Cumbria, Lancashire, Greater Manchester, Derbyshire or North West Cheshire please visit the SP Electricity North West [engagement page](#).

	Research and engagement November	Submission of data tables to Ofgem July			Final submission November	Draft determination June	Final determination November	Start of ED3 April
	2025	2026				2027		2028
Consumer research	Phases 1 & 2 Understand customers’ priorities and expectations Q4 25 – Q2 26	Phase 3 & 4 Value testing Jul – Sep			Ongoing engagement			
Stakeholder engagement	Phases 1 & 2 Identify stakeholders’ needs and views on ED3 direction Q4 25 – Q2 26	Phase 3 Initial test Jul – Aug	Phase 4 Final test Aug – Sep		Ongoing engagement			
		Develop initial proposals	Refine proposals	Final proposals				

