



Environmental Audit Committee

House of Commons, London SW1A 0AA

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Rt Hon Clare Coutinho MP
Secretary of State for Energy Security and Net Zero
Department for Energy Security and Net Zero
55 Whitehall
London SW1A 2HP

Sent by email only

13th February 2024

Dear Secretary of State —

The Environmental Audit Committee has been examining small modular reactor technology and the factors impacting the deployment of these reactors in the inquiry Small modular reactors in the transition from fossil fuels, which has formed part of the Committee's workstream examining the contribution technological innovations can make to addressing current decarbonising challenges. We received 34 responses to our call for evidence, which we issued on 19th October 2023: these included a submission from your Department.ⁱ We are grateful to all those who took the time to submit written evidence to this inquiry.

On 13th December 2023 we held an evidence session at which we heard from Great British Nuclear, the Office for Nuclear Regulation, and various industry stakeholders.ⁱⁱ Following this session, I am writing to you with the Committee's observations.

The terms of reference and the timescale we adopted for this short inquiry necessarily excluded a full consideration for the case for nuclear as part of the UK's energy mix under current strategies. Current Government policy on the role of nuclear to 2050 is settled and we have made no assessment of the merits or otherwise of that policy in this specific inquiry. We have set out to examine whether the approach currently taken to delivery is likely to achieve the benefits stated, and to analyse what, if any, significant risks there are to successful delivery.

The Committee has noted the formation of Great British Nuclear and the recent announcement of the six shortlisted SMR companies from its Technology Selection Process.ⁱⁱⁱ The Committee has not sought to engage in that competitive process, and nothing in this letter ought to be construed as attempting to influence the operation of that process.

I set out below our observations on the evidence we have received, followed by a list of questions to which the Committee would be grateful to receive answers.

Since we received the evidence for this inquiry, the Government has issued its civil nuclear roadmap to 2050, a consultation on alternative routes to market for new nuclear projects, and a consultation on approaches to siting new nuclear power stations beyond 2025.^{iv} While we were not able to take the views of our witnesses on the strategy and proposals set out in these papers, you will of course wish to arrange for the response to draw on the Government's policy and approach as set out in them.

Observations on the Government's policy and approach

Small modular reactor technology and deployment

Small modular reactors (SMRs), by the UK's definition, utilise existing nuclear fission technology but have a lower ('smaller') power output than conventional nuclear reactors.^v Given that SMRs are based on technologies which we were assured is well-established, we were told that prototype SMRs are considered unnecessary, allowing quicker deployment of generating capacity.^{vi} However, in some of the written evidence the Committee received, concerns were raised that "no commercial order for an SMR design has yet been placed worldwide", raising questions about the commercial feasibility of this plan.^{vii} The majority of components of SMRs are expected to be factory-produced and assembled on site, reducing construction time and costs (hence the term modular reactors). Reduced construction time is expected by Government to result in a commensurate reduction in the cost of electricity to the consumer.^{viii}

The scientific and business case for the Government's policy on SMRs has been subject to sustained challenge, reflected in some of the written evidence we have received.^{ix}

The Government intends the deployment of SMRs to assist the UK in reaching a target of generating up to 24GW of nuclear power by 2050 set under the British Energy Security Strategy.^x In its Civil Nuclear Roadmap the Government has indicated that it will "aim to secure investment decisions to deliver" between 3 and 7GW of nuclear generating capacity every five years from 2030 to 2044.^{xi} The capacity range is considered "the right balance between maintaining flexibility to respond to the needs of the power sector, providing sector confidence and ensuring a low-cost energy system over the coming decades."^{xii}

The investment decisions sought between 2030 and 2044 are likely, on current plans, to realise generating capacity of between 9GW and 21GW, a range of 12GW (or half the Government's 24GW upper target for nuclear capacity by 2050). Great British Nuclear (GBN) told us that the Government's target of producing "up to" 24GW of nuclear power was not sufficient to give industry confidence about the scale of investment that would be required, and suggested that a specific programme would be required to facilitate this.^{xiii}

In our oral evidence session, witnesses from the industry told us that achieving net zero in the UK by 2050 would be hard to achieve without some form of nuclear power, whether that be gigawatt-scale nuclear reactors or SMRs.^{xiv} We received some contrary evidence stating that the UK could achieve energy security and deliver on its climate goals by, for example, pursuing renewable expansion, energy efficiency, storage technologies, grid modernisation and interconnection.^{xv}

The timeline for SMR deployment indicates that a final investment decision on the first SMR is expected to be taken in 2029.^{xvi} It seems unlikely that the reactor will be contributing generating capacity to the grid until 2035, which is the date by when the Government expects the GB electricity grid to have been decarbonised. The overall role of SMRs in replacing fossil fuel generation by 2035 is therefore called into question. While SMRs are said to benefit overall energy security, since they will be able to provide electricity during periods when renewables are

not generating power, concerns have been raised about the relative flexibility or otherwise of nuclear power generation and its place in a more agile energy system powered by renewables.^{xvii}

Since the energy mix in 2035 is likely to be dominated by renewables, supplemented by electricity from the gigawatt-scale nuclear facilities already commissioned and under construction, some witnesses questioned whether additional SMRs were likely to be surplus to the UK's energy requirements.^{xviii} We heard from industry witnesses that SMRs were expected to provide a stable power supply, reducing energy system costs, and that they also allowed flexibility and load-following: at times of peak demand, SMR fleets generate electricity, while at times of low demand a portion of a fleet would have the potential to switch to generating hydrogen or carrying out direct air capture to remove CO₂ from the atmosphere.^{xix} We note that the Government's current consultation on alternative routes to market for new nuclear projects is seeking views on uses for nuclear energy beyond the provision of baseload power, in the expectation that advanced reactor technologies will in time be available for deployment in modular form.^{xx}

In response to issues raised about the generation and disposal of waste from SMRs, we heard that safe and effective waste management was a key component of the UK's regulatory procedures. We heard from the National Nuclear Laboratory that SMRs were likely to have similar waste considerations as conventional pressurised water reactors of a similar design, such as the reactor at Hinkley Point C.^{xxi} We nevertheless received evidence to indicate that SMRs of the models contemplated for UK deployment were in fact likely to result in a greater amount of waste for storage and reprocessing.^{xxii}

We heard about the possible economic benefits of SMRs, including a large potential export market for SMR units.^{xxiii} The construction of nuclear power plants was also said to be a potential stimulus for local economic activity, creating well-paid, high-skilled jobs in areas where these may be lacking.^{xxiv} Witnesses also cited reputational benefits to the UK from being seen as an innovator in nuclear technology: we were told that the UK was in an advanced position among Western countries with regards to SMR deployment, a factor which witnesses contended placed the UK in a good position to take advantage of these benefits.^{xxv} We note that the views of witnesses were not unanimous on this point, and we received a sustained critique of the benefits claimed for the SMR programme.^{xxvi}

Costs

We note from the evidence we received that, despite claims that the modularity of SMRs would make up for lost economies of scale, these claims will not be able to be substantiated until production begins. Industry stakeholders observed that consistency of build tended to increase the efficiency of construction and therefore tended to decrease construction costs. Stakeholders observed that while the costs of building first-of-a-kind SMRs may be high, these costs would likely to decrease by as much as 40% as more units are built and the benefits of learning and standardisation were realised. However, we received written evidence observing that mass production raised challenges for project management and quality control, and that major civil engineering operations would be needed for site works, suggesting that overall cost reductions might not be so significant.^{xxvii}

We heard that decisions on construction of a factory to produce SMR components can only be taken by manufacturers on the basis of a commitment to order SMR units: this appears to require the Government to commit to expenditure on a number of SMR units before this crucial element of the supply chain can be put in place.^{xxviii}

We also heard that, despite the fact that the levelised costs of SMR-generated electricity were likely to be higher than for renewable technologies, the provision to the grid of an increased proportion of nuclear power from nuclear sources was expected to decrease energy system costs as a whole.^{xxix} Aurora Energy, in a report commissioned by Rolls-Royce SMR, estimated that integrating SMRs of the type Rolls-Royce proposes to construct into the grid in combination with renewables would be likely to reduce wholesale electricity prices by up to 28% by 2040.^{xxx} It is not clear whether this modelling fully takes into account the likely impact on wholesale and retail electricity prices from the use of the regulated asset base (RAB) model which the Government is contemplating as a means to fund the construction of SMRs.

Great British Nuclear and the SMR programme

Great British Nuclear currently plans for SMRs to be deployed in the UK by 2035, with at least one SMR project to be taken to Final Investment Decision by 2029.^{xxxi} We note the proposal to establish UK development companies to advance the implementation of the projects to be awarded government contracts.^{xxxii}

GBN explained to us that between one and four designs are to be selected for government contracts.^{xxxiii} The Office for Nuclear Regulation observed that the deployment of multiple SMR designs would reduce the risk of any design flaw or supply chain issue delaying the overall progress to operation.^{xxxiv}

Greenpeace UK highlighted to us the importance of value for money assessments of SMR projects which are to receive public investment, and called for these assessments to be published for scrutiny in advance of contracts being signed.^{xxxv} GBN confirmed to us that they are to consider value for money for the consumer as a significant component of their selection process, and have undertaken to publish all such assessments undertaken.^{xxxvi} **We trust that, in the interests of parliamentary and public confidence in the expenditure of public money and the timely delivery of its expected benefits, the programme will be fully subject to value for money audit by the National Audit Office, provided that this does not add delay to delivery.**

Regulatory procedures

Regulation of nuclear power plants in the UK is undertaken by the Office for Nuclear Regulation, in collaboration with the Environment Agency and Natural Resources Wales. We heard that the UK's regulatory procedures are considered to set a 'gold standard' internationally: this was said to increase the opportunity for export of UK-produced SMR components.^{xxxvii}

We note GBN's commitment to deliver SMRs at pace and at scale without compromising the necessary regulatory procedures. Other stakeholders, including the Institution of Mechanical Engineers and Spydr Public Policy Education, have nevertheless indicated the need for regulatory processes to be streamlined in order to ensure timely SMR deployment.^{xxxviii} The Nuclear Industry

Association contended that the pace of planning consent ought to be accelerated by at least half compared with the pace of consents granted between 2008 and 2023.^{xxxi} The Government has set out, in the Civil Nuclear Roadmap, a package of measures designed to streamline planning and regulatory processes. **Given the pressure for acceleration, the governance processes around the SMR programme must be sufficiently robust to ensure that regulatory procedures are not compromised.**

Planning decisions for new nuclear projects are controlled by the relevant national and local planning authorities.^{xi} The ONR explained that its Generic Design Assessment (GDA) process is a non-statutory site-agnostic process to assess the safety and environmental impact of designs which currently takes approximately five years.^{xii} In the regulator's view, this process enables the timely commencement of site-specific licensing. Imperial Policy Forum questioned why the GDA process could not be run in parallel with site-specific licensing.^{xiii}

We received a number of submissions which sought clarity on the capacity of the regulator to assess multiple SMR designs.^{xiiii} The ONR emphasised the role of the GDA in de-risking new nuclear projects and increasing investor confidence.^{xiv} The ONR indicated that SMR vendors awarded government contracts via GBN's technology selection process would be ensured GDA assessment, but explained they had resources to assess three or four GDA applications concurrently.^{xv} The ONR also highlighted their ongoing collaboration with Ofgem (the economic regulator) to ensure that the economic and environmental regulatory procedures are kept aligned.^{xvi} GBN stated that they were currently collaborating with the ONR to streamline processes like the GDA and Development Consent Order processes to maintain their regulatory excellence but to keep net zero targets in mind.^{xvii}

Many regulatory bodies are responsible for the regulation of nuclear power plants in the UK, though regulation is principally facilitated by the Office for Nuclear Regulation. The Institution of Mechanical Engineers observed to us that the current compartmentalisation of the UK nuclear industry, where separate bodies manage different stages of the nuclear life cycle, may prevent quick deployment of SMRs in the UK.^{xviii} GBN clarified that it was within their remit to ensure collaboration between these regulatory bodies to ensure that a common regulatory approach across the lifecycle of nuclear projects.

Skills, supply chains and infrastructure

No new nuclear reactors in the UK have come online since 1995: the Science, Innovation and Technology Committee has reported at length on the consequent skills deficit in the UK civil nuclear sector.^{xlix} In a 2015 report, the then Department of Energy and Climate Change estimated that the nuclear sector must recruit 8,600 people year in order to meet the requirements of the growing industry.^l In our oral evidence session we heard that investment was needed across the whole nuclear lifecycle in order to facilitate SMR deployment.^{li} Specifically, SMR deployment introduced skills requirements for factory work, on-site construction and plant operation. We note the proposals for skills development set out in the Civil Nuclear Roadmap.

The National Nuclear Laboratory emphasised the need for continuity in nuclear build to ensure that workers were able to maintain employment across multiple nuclear projects.^{lii} The Nuclear Industry Association and GBN highlighted the need for a nuclear skills programme to provide the necessary positive signals to industry for skills and supply chain development to occur.^{liii} Deficits in construction and civil engineering jobs were highlighted to the Committee in our oral evidence session.^{liv} Several submitters of written evidence asserted that British supply chains might not be ready to deploy SMRs. The Institution of Mechanical Engineers highlighted the fact that deploying SMRs without concurrent supply chain development could hinder deployment and increase the associated capital costs.^{lv} Several stakeholders highlighted that new grid infrastructure may be required to facilitate on-grid deployment of SMRs: Assystem Energy and Infrastructure Ltd termed it a “significant challenge” to deploying SMRs on the timescales proposed by Great British Nuclear.^{lvi} We expect to examine this issue in greater depth in the course of our current inquiry into *Enabling sustainable electrification of the UK economy*.^{lvii} We note the establishment of the Nuclear Skills Taskforce to address the nuclear skills gap, as well as the Green Industries Growth Accelerator Fund.

Financing

Several of the submissions we received offered the view that the Regulated Asset Base (RAB) model was likely to be the most appropriate for financing the construction of SMRs.^{lviii} Under this model, the burden of risk is distributed away from investors, since part of the financing is derived from a surcharge on consumer energy bills. The Government has argued that this model also reduces the overall cost of financing the plant (for example by reducing reliance on loans), and therefore the cost of electricity generated by the finished plant.^{lix} We note that while there are examples of large capital expenditure projects successfully funded in part through levies on consumer bills, RAB financing has the potential to impose heavy costs and substantial risks on consumers. The Ofgem response to the Government consultation on using the RAB model for new nuclear installations indicated that the Government ought to undertake an analysis exercise with suppliers “to minimise risks, impact and unnecessary disruption on suppliers and the wider energy market” from the use of RAB, and ought to “work and engage with all relevant parties and their representatives including consumers, regulators, suppliers and other parts of government to ensure consumer impacts are assessed, any adverse impacts identified and minimised, and that current and future vulnerable consumers are protected.”^{lx} **We would be grateful for an assurance that Ministers have conducted a full assessment of the potential risks to the energy market and to consumers of the use of a RAB model for the financing of SMR installations.**

GBN indicated that it was not yet entirely clear which funding models would be used to fund SMR projects in the UK, though it appeared likely that a RAB-based model would be used.^{lxi} We also heard that the shorter construction times of SMRs would allow for quicker learning and de-risking, meaning that private finance might be sufficient to fund construction after the first few SMR units had been deployed.^{lxii} GBN indicated that the ability of companies to attract private investment was to be considered in their technology selection process.^{lxiii}

Siting

We heard that siting SMRs in locations with existing grid infrastructure, whether in existing designated nuclear sites or as replacements for coal-fired power stations, was likely to reduce barriers to SMR deployment.^{lxiv} We also heard that nuclear power stations were likely to require less investment for integration with the grid than renewable technologies.^{lxv} We note the Government's recent consultation paper on approaches to siting new nuclear power stations beyond 2025.^{lxvi}

In the UK, nuclear power plants tend to be built coastally to allow access to cooling water. The Institution of Mechanical Engineers highlighted the importance of constructing new nuclear power plants with regard to the "worst case scenario" of the impacts of climate change—in effect, up to 3 metres of sea level rise and associated flooding risks.^{lxvii}

Questions

SMRs in the Government's Civil Nuclear Roadmap

1. Please set out the contribution in GW which power from SMRs is expected to make to the electricity generation mix in the UK by 2035, the date by which the UK's power system is expected to be decarbonised.
2. What assessment has the Government made of the cost to (a) the public purse and (b) consumers of (i) an electricity system with SMRs as part of the energy mix and (ii) a system based on variable renewables?
3. The Government is expecting investment decisions on nuclear generating capacity of between 3 and 7GW in each of the three five-year periods between 2030 and 2044. For each such period, please set out the (a) minimum and (b) maximum likely number of investment decisions in each of these periods which involve SMRs, and the Government's estimate of the (i) lowest and (ii) highest proportion of overall generating capacity represented by investment decisions involving SMRs.
4. Please set out the Government's overall assessment of the readiness for deployment of the designs for SMRs selected in the GBN competition, given that none are yet commercially available or licensed by any nuclear regulator.

Construction of SMRs

5. What account will the Government be taking of low carbon construction techniques in making a final decision on initial investment in the SMR programme and in developing the programme?

Cost of SMRs and the initial investment programme

6. What is the estimated overall cost of the initial SMR programme the Government is contemplating, and how much of this is likely to be borne by the public purse?
7. Under the Regulated Asset Base (RAB) model under consideration by the Government:
 - a) to what extent will the cost of constructing and operating SMRs be borne by electricity consumers; and what assessment Ministers have made of the effect this might have on consumer behaviour?
 - b) will the consumer contribution to SMRs be capped, and if so, what criteria will be taken into account when setting the cap?
 - c) what assessment have Ministers undertaken of the potential risks to the energy market and to consumers of the use of a RAB model for the financing of SMR installations?
8. Will Ministers undertake to publish each value for money assessment undertaken for Government on any or all elements of the SMR programme in advance of committing the Government to contracts; and will Ministers undertake to facilitate a review by the National Audit Office of the value for money of the programme in advance of any final investment decision involving public money?
9. What assessment has the Government made of the risks of escalating costs to the public purse of the proposed SMR programme? Will Ministers publish any assessment made?
10. What assessment has the Government made of the (a) effectiveness and (b) cost control of programmes in other countries to deliver modular nuclear reactors?

Planning and regulation

11. What governance arrangements does the Government plan to use to ensure that the proposed streamlining of planning and regulatory processes for SMRs does not compromise public safety and environmental protection?
12. What estimate have Ministers made of the quantity of waste expected to be produced annually by an SMR using PWR technology; how this compares with the quantity of waste produced by GW-scale reactors; and what arrangements are to be put in place for the (a) storage and (b) processing of waste from SMRs prior to the commissioning of the geological disposal facility envisaged in the Civil Nuclear Roadmap?

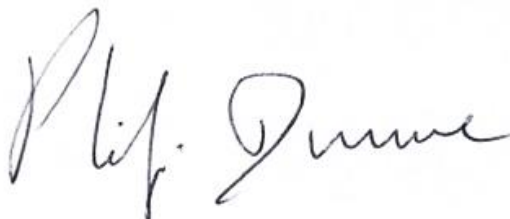
SMRs and the economy

13. How will the Green Industries Growth Accelerator Fund be deployed to facilitate development of the nuclear supply chain, and what consideration is being given to ensuring that the investment promotes growth across more green technologies?
14. What assessment has the Government made of the potential market for export of SMR units if an SMR construction facility is established in the UK; what is the earliest date such a facility might be operational following a final investment decision on construction of the first SMR in the UK in 2029; and to what extent does the potential for future exports underpin the value for money case for supporting SMR projects with taxpayer funding?

I should be grateful if you would arrange for the Committee to receive a response to the questions set out above not later than Thursday 21st March.

Copies of this letter go to the Chairs of the Science, Innovation and Technology Committee, the Energy Security and Net Zero Committee and the Committee of Public Accounts, to the Comptroller and Auditor General and to the Chair of Great British Nuclear.

Yours sincerely,



Rt Hon Philip Dunne MP
Chairman of the Environmental Audit Committee

ⁱ The published oral and written evidence received in the inquiry is available on the Committee's website at <https://committees.parliament.uk/work/7965/small-modular-reactors-in-the-transition-from-fossil-fuels/publications/>

ⁱⁱ [*Small modular reactors in the transition from fossil fuels*](#), Oral evidence taken before the Environmental Audit Committee on 13 December 2023, HC 281. In these notes Q refers to the question number in the oral evidence transcript.

ⁱⁱⁱ Department for Energy Security and Net Zero and Great British Nuclear, '[Six companies through to next stage of nuclear technology competition](#)', news release, 2 October 2023

^{iv} Department for Energy Security and Net Zero, [Civil nuclear: roadmap to 2050; Alternative routes to market for new nuclear projects](#), and [Approach to siting new nuclear power stations beyond 2025](#), January 2024

^v [Q3](#) (Dr Gareth Headdock, Chief Science and Technology Officer, National Nuclear Laboratory)

^{vi} [Qq72–73](#) (Simon Bowen, Chair, Great British Nuclear)

^{vii} Professor Stephen Thomas (Emeritus Professor of Energy Policy at University of Greenwich) ([SMR0004](#))

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- viii Department for Energy Security and Net Zero, [Alternative routes to market for new nuclear projects](#), January 2024
- ix Professor Stephen Thomas (Emeritus Professor of Energy Policy at University of Greenwich) ([SMR0004](#))
- x HM Government, [British Energy Security Strategy](#), April 2022, p. 21
- xi Department for Energy Security and Net Zero, [Civil Nuclear: Roadmap to 2050](#), January 2024, p. 21
- xii *Ibid.*
- xiii [Q81](#)
- xiv For example in [Q1](#) (Tom Greatrex, Chief Executive, Nuclear Industry Association)
- xv Nuclear Consulting Group ([SMR0017](#)), para 8.6
- xvi Department for Energy Security and Net Zero, [Civil Nuclear: Roadmap to 2050](#), January 2024, p. 22
- xvii UK and Ireland Nuclear Free Local Authorities ([SMR0005](#))
- xviii UK and Ireland Nuclear Free Local Authorities ([SMR0005](#)), paras 6.7–6.8
- xix [Q7](#) (Dr Gareth Headdock); [Qq29](#), [45](#) (Matthew Rooney)
- xx Department for Energy Security and Net Zero, [Alternative routes to market for new nuclear projects](#), January 2024, p. 11
- xxi [Q8](#) (Dr Gareth Headdock)
- xxii [Q12](#); Professor Stephen Thomas ([SMR0004](#)) para 4.3; UK and Ireland Nuclear Free Local Authorities ([SMR0005](#)) para 4.1; Nuclear Consulting Group ([SMR0017](#)) para 5.1; Greenpeace UK ([SMR0032](#))
- xxiii [Qq45–47](#)
- xxiv [Q53](#) (Matthew Rooney, Head of Policy, Institution of Mechanical Engineers)
- xxv [Q47](#) (Matthew Rooney)
- xxvi Professor Stephen Thomas ([SMR0004](#))
- xxvii Professor Stephen Thomas ([SMR0004](#)), para 4.1.3
- xxviii [Q30](#) (Dr Gareth Headdock)
- xxix [Q28](#) (Matthew Rooney)
- xxx Rolls-Royce SMR and Aurora Energy, [Benefits of integrating Rolls-Royce SMRs into the UK’s energy mix](#), July 2023
- xxxi [Q82](#) (Simon Bowen)
- xxxii [Q62](#)
- xxxiii [Q55](#), [Q58](#): Simon Bowen suggested that two designs might be selected.
- xxxiv Office for Nuclear Regulation ([SMR0034](#))
- xxxv Greenpeace UK ([SMR0032](#))
- xxxvi [Q78](#) (Simon Bowen)
- xxxvii [Q5](#) (Dr Gareth Headdock)
- xxxviii Institution of Mechanical Engineers ([SMR0020](#)); Spydr PPE (Spydr Public Policy Education) ([SMR0002](#))
- xxxix Nuclear Industry Association ([SMR0016](#))
- xl Office for Nuclear Regulation, [Licensing nuclear installations](#), November 2021, p. 13
- xli Office for Nuclear Regulation ([SMR0034](#))
- xlii Imperial Policy Forum ([SMR0006](#))
- xliii For example, Midlands Nuclear ([SMR0018](#)); Last Energy UK ([SMR0030](#)); Castletown Law ([SMR0012](#))
- xliv [Q63](#) (Donald Urquhart)
- xlv [Q67](#)
- xlvi Office for Nuclear Regulation ([SMR0034](#)); [Q79](#)
- xlvii [Q70](#)
- xlviii Institution of Mechanical Engineers ([SMR0020](#))
- xlx Science, Innovation and Technology Committee, [Delivering nuclear power](#), Eighth Report of Session 2022–23, HC 626, July 2023, chapter 5
- l Department of Energy and Climate Change, [Sustaining our nuclear skills](#), March 2015, p 4
- li [Q40](#) (Dr Gareth Headdock)
- lii National Nuclear Laboratory ([SMR0022](#))
- liii Nuclear Industry Association ([SMR0016](#)); [Q71](#)
- liv For example, [Q53](#)
- lv Institution of Mechanical Engineers ([SMR0020](#))
- lvi Assystem Energy and Infrastructure Limited ([SMR0028](#))

^{lvii} Details of this inquiry can be found at <https://committees.parliament.uk/work/7680/enabling-sustainable-electrification-of-the-uk-economy/>

^{lviii} For instance, Cwmni Eginio ([SMR0007](#)); Bangor University Nuclear Futures Institute ([SMR0009](#)); Nuclear Industry Association ([SMR0016](#))

^{lix} Department for Energy Security and Net Zero, [Alternative routes to market for new nuclear projects](#), January 2024, paras 96–98

^{lx} See [Ofgem’s response to the consultation on the Revenue stream for the Nuclear RAB model](#), 29 July 2022

^{lxi} [Q74](#) (Simon Bowen)

^{lxii} [Q74](#) (Simon Bowen)

^{lxiii} [Q75](#) (Simon Bowen)

^{lxiv} Nuclear Industry Association ([SMR0016](#))

^{lxv} [Q30](#) (Dr Gareth Headdock)

^{lxvi} Department for Energy Security and Net Zero, [Approach to siting new nuclear power stations beyond 2025](#), January 2024

^{lxvii} Institution of Mechanical Engineers ([SMR0020](#))