

Electricity Transmission Operations Team
Ofgem

17 May 2021

By email to: RIIO2@ofgem.gov.uk

Dear colleagues

National Grid Electricity Transmission (NGET) Bengeworth Road Grid Supply Point (GSP) Project

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three licensed distribution companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. It is not confidential and may be published on Ofgem's website.

We have reviewed the consultation document and have the following responses to the consultation questions:

Question 1: Do you agree with our view of the validity of the needs case for the Bengeworth Road GSP Project?

We agree that the needs case demonstrated is valid.

Question 2: Do you agree with our technical assessment of the range of solutions to meet the needs case?

Yes, in addition we would add the following comments in reference to the following consultation document paragraphs:

3.7 – The delivery of long open cut cable routes within Inner London has been extensively tested with stakeholders through both the LPT1 and LPT2 tunnel programmes. These major schemes and Ofgem's endorsement of them demonstrates the difficulty in installing open cut cable routes within Inner London.

3.9 – In addition, similar difficulties to those noted have been experienced by National Grid in the design and procurement phases of the LPT2 project. This National Grid project follows broadly the same route as the UK Power Networks tunnel would have followed, and they experienced significant cost increases. Based on this awareness of route difficulty, if a parallel tunnel following the LPT2 tunnel route were to be installed, this would represent a much greater risk compared to the alternatives listed.

Question 3: Do you agree with our minded-to view of the solution proposed by NGET?

We agree with the minded-to view of the solution proposed.

Question 4: Do you agree with our cost assessment of NGET's proposed new GSP at Bengeworth Road?

We agree with the cost assessment of the new GSP at Bengeworth Road.

I hope that our response is helpful. If you have any questions, please do not hesitate to contact David Pang.

Yours sincerely



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