

From: [John Cunningham](#)
To: [Offshore Coordination](#)
Subject: OTNR Consultation Response from Comhairle nan Eilean Siar
Date: 07 September 2021 19:55:15

Dear Mr Copeland,

Here is a response to your Offshore Transmission Network Review consultation from Comhairle nan Eilean Siar, Local Authority for the Western Isles of Scotland.

There is 420MW of Onshore Wind generation already consented and contracted to Grid in the Western Isles of Scotland and SSEN Transmission has been unable to connect this generation to Grid for some 12 years now.

In 2019, SSEN Transmission submitted its latest Needs Case for the Transmission Link to OFGEM based on a 600MW cable which would allow headroom for pipeline energy projects over and above the 420MW currently consented. It is important to note that SSEN's Needs Case design and early procurement work is based on a 600MW cable and downsizing cable capacity would require design and procurement to be re-started, adding years to the process.

In response to the 2019 Needs Case, OFGEM directed that the required Transmission Link could go ahead if both principal Onshore developers – Lewis Wind Power (180MW) and Uisenis Power (180MW) – secured Contracts for Difference in the 2019 Allocation Round. In the event, Uisenis Power secured a Contract but Lewis Wind Power did not. OFGEM then agreed to keep the Needs Case open but were minded to approve a 600MW cable only if the additional cost of a 600MW cable over a 450MW cable did not fall on the GB consumer.

A 600MW cable is essential for two reasons: a) it provides capacity for connecting additional planned Net Zero schemes to Grid in the UK's area of best renewable resource; and, b) the Transmission Network Use of System charges paid by connecting generators are a reflection of the proportion of cable capacity that that generator takes up where the additional cost of a 600MW cable over a 450MW cable is negligible (a 180MW Wind Farm will pay 30% of total TNUoS on a 600MW cable but 40% of total TNUoS on a 450MW cable and this uplift renders the already marginal Wind Farm non-viable).

Comhairle nan Eilean Siar is in detailed discussion with prospective ScotWind Offshore Wind developers who have bid into ScotWind Area N4, 6km off the west coast of our principal island Lewis but 180km from Dounreay. Both developers bidding into ScotWind Area N4 have indicated an eagerness to connect 200MW of generation (and more if it is available) through Lewis and into the planned 600MW Transmission Link by 2027 in order to support the case for the new Transmission Link. The remainder of generation from ScotWind Area N4 (circa 800MW) could then connect to Dounreay. While we recognise that SSEN have developed an exclusive 600MW solution, we urge you, through the OTNR, to consider a doubling of this capacity for ScotWind by supporting SSEN to instal a second 600MW cable alongside the existing cable or to instal a second 600MW cable in the seabed section and ducting in the overland section which will allow a second 600MW cable to be installed and energised as required, upgrading the link to 1,200MW with ScotWind generators providing guaranteed generation. With ScotWind developers now in play and demonstrating developer commitment through multi-million pound Option Fee payments, a composite 1,200MW cable could be filled from 2027 with 420MW from

consented and contracted Onshore Wind and 800MW from ScotWind Area N4. This provides a route to market for the entire capacity of ScotWind Area N4 generation, many years ahead of SSEN's proposed Dounreay Hub, and contributes to major Net Zero projects in the Western Isles around Green Hydrogen production, storage and distribution from shared ownership in early ScotWind generation.

There is precedent for the dual cable concept since SSEN, in the early days of the Western Isles Transmission Link, initially proposed two 450MW HVDC cables with two 450MW cables installed in the subsea section and capability to retrofit a second 450MW cable in the overland section, through ducting, for later energisation as demand developed. We feel that this provision, but at 2 x 600MW rating, would signal a real intent by OFGEM, BEIS, NG ESO, SSEN and Scottish Power to take Net Zero seriously and to access as much ScotWind generation as possible as early as possible, all in the national interest.

The Comhairle was surprised and disappointed to hear that SSEN Transmission has been informing ScotWind developers in Area N4 that, based on OTNR direction of travel, their only connection option is through Dounreay when 200MW of spare capacity will be sitting on a Transmission Link in the neighbouring island of Lewis – 800MW if the dual cable solution described above is activated.

This situation is particularly concerning on two counts: a) the 200MW of generation freely offered by ScotWind developers will finally make the case for the required 600MW cable, delivering £2bn of private project value through the Transmission Link and associated Onshore Wind Farms; and, b) the benefits the Comhairle anticipates from ScotWind are based to a large extent on these schemes connecting through Lewis. If these islands are bypassed in favour of an enforced connection to Dounreay, the socioeconomic benefits from ScotWind for our fragile island communities will be meagre indeed.

The Comhairle and the five communities which will be most affected by deployment in ScotWind Area N4 have concluded a detailed Memorandum of Understanding with both ScotWind developers. These Memoranda will deliver transformational investment in population stabilisation, Low Carbon skills development, Climate Action, community wealth building and local Green Hydrogen production, storage and distribution. Participation in these programmes by the ScotWind developers is in response to the inevitable disruption caused by through-island connection to Grid. If the islands are bypassed, the benefits promised by these Memoranda will be lost.

The Comhairle accepts that, following the experience in England where multiple new Offshore Transmission connections came ashore in close proximity impacting significantly on visual amenity, the ESO will want to consolidate ScotWind connections through a number of regional hubs. However, the opportunity in the Western Isles is around connecting 200MW of ScotWind generation to an EXISTING Transmission Link which happens to have spare capacity. There will be no negative visual impact from connecting to this Link.

The Comhairle urges you, through the Offshore Transmission Network Review, to build in provision for solutions such as described above which strengthen the case for existing infrastructure, support Net Zero deployment in the UK's area of best resource by containing TNUoS costs for onshore developers and commit ScotWind developers to transformative

community benefit.

We would be happy to discuss this matter with you in more detail if that is required.

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