



Via email:

RIIOElectricityTransmission@ofgem.gov.uk

Email: Tom.Steward@RWE.com

20th December 2021

**Ref: Consultation on the initial findings of our Electricity Transmission
Network Planning Review**

Dear Konark Anand,

RWE Renewables is one of the world's leading renewable energy companies. With around 3,500 employees, the company has onshore and offshore wind farms, photovoltaic plants and battery storage facilities with a combined capacity of approximately 9 gigawatts. RWE Renewables is driving the expansion of renewable energy in more than 20 countries on five continents. From 2020 until 2022, RWE Renewables targets to invest €5 billion net in renewable energy and to grow its renewables portfolio to 13 gigawatts of net capacity. Beyond this, the company plans to further grow in wind and solar power. The focus is on the Americas, the core markets in Europe, and the Asia-Pacific region.

Thank you for the opportunity to respond to this consultation on the future of transmission network design. We agree with OFGEM that the timely delivery of Net Zero, and other climate objectives, necessitates strategic, anticipatory investment across the onshore and offshore transmission networks, coordinated with other energy networks.

We welcome OFGEM's acknowledgement that we are not able to wait for the enduring solution to be introduced to begin such work – that an interim arrangement based on today's governance framework is necessary to deliver the 40GW of offshore wind by 2030. To do otherwise would significantly risk meeting this 2030 target, and in turn net zero by 2050 (or 2045 in Scotland).

We believe that strategic anticipatory investment of this type should not be limited to the Main Integrated Transmission System, but extend to other circuit types where appropriate. For example, where offshore leasing zones have been identified by The Crown Estate and Crown Estate Scotland, the anticipatory development of local circuits for avoid delays to connections may be necessary. We acknowledge that alterations to the TNUoS regime may be necessary to ensure that the TOs are able

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to recover appropriate revenues ahead of generation sites coming online, however obstacles such as this should not preclude necessary anticipatory investment from taking place.

We propose that any future Central Network Planner, be that the FSO or an alternative body, must have a clear focus on delivery of a cost-efficient transition to Net Zero, with such a focus reflected in its primary duties.

Given the synergies between this consultation and BEIS' recent consultation 'Offshore Transmission Network Review: Enduring Regime and Multi-Purpose Interconnectors', please find attached our response to the BEIS consultation, which sets out many of our views on the topic.

Yours sincerely,

Dr. Tom Steward

Senior Regulatory Affairs Manager
RWE Renewables