**Presentation to NeuConnect** 

### NeuConnect socio-economic welfare impact

Results of socio-economic welfare analysis





FINAL

19 May 2022

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## **Executive summary**



#### F N E R G FTI-CL has been engaged to perform an independent analysis of the socioeconomic welfare impact of the NeuConnect interconnector

Asset overview

#### **Proposed NeuConnect interconnector**



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### We have analysed the impact of the interconnector on GB socioeconomic welfare using NeuConnect's Policy Scenario, developed in 2021

#### Introduction and methodology

- FTI-CL has analysed the impact of NeuConnect on GB's socio-economic welfare (SEW) using the following equation: (i) change in consumer surplus; *plus* (ii) change in producer surplus; *plus* (iii) change in IC (non-NeuConnect) rents; *plus* (iv) NeuConnect Congestion rents; *less* (v) NeuConnect's cost.
- Additional benefits of NeuConnect, such as contribution to ancillary services and to the GB Capacity Market have not been quantified in this
  assessment, but these factors could enhance the benefits of the link to GB consumers.
- We have estimated the SEW impact using FTI-CL's in-house power market model (that runs on Plexos<sup>®</sup> Market Simulation Software a well known and widely used power market model), calibrated with a detailed representation of the European power market.
- Using the formula and the projected components of socio-economic welfare mentioned above, we calculate the net impact on GB's socio-economic welfare, if NeuConnect was to be approved and construction completed by 2028.

#### **Policy Scenario**

- To perform the assessment of NeuConnect, we have developed a set of assumptions regarding demand, generation mix, commodity prices, and others that we refer to collectively as the 'Policy Scenario'.
- This scenario reflects a decarbonisation pathway consistent with the Net Zero ambitions / legal commitments of European (including UK) governments. We use these assumptions to project the components of socio-economic welfare (mentioned above) to 2050.
- The Policy Scenario has been developed using a range of third-party projections, FTI's expert judgement, as well as NeuConnect's input on specific issues.
- Examples of third-party projections include, among others:
  - European Network of Transmission System Operators for Electricity's ("ENTSO-E's") Ten-Year Network Development Plan ("TYNDP")
  - National Grid Electricity System Operator's Future Energy Scenarios ("FES"); and
  - Germany's National Energy and Climate Plan ("NECP").
- The Policy Scenario (version from 2020) has been used in the past in publicly available reports, such as <u>here</u>.

### E N E R G Y

# The Policy Scenario used in our analysis reflects a range of external benchmarks to provide a consistent and credible pathway to Net Zero

### **Development process for the Policy Scenario**



### Comparison of the Policy Scenario to NG ESO's Future Energy Scenarios ("FES")

FES 2021	FES 2022	Policy Scenario	
<ul> <li>Scenarios published by NG ESO (which may make them more 'familiar')</li> <li>Three out of four FES scenarios are consistent with Net Zero by 2050</li> <li>Developed prior to July 2021, so are out of date (relative to developments in late 2021 and 2022). Indeed they:</li> <li>do not reflect the 2021 energy supply issues and associated policy responses; and</li> <li>do not reflect the Russia-Ukraine conflict and BESS<sup>2</sup></li> </ul>	<ul> <li>Have yet to be published</li> <li>and are not expected to be available until later in 2022</li> <li>Unclear which recent energy market developments will be included</li> </ul>	<ul> <li>Consistent with Net Zero targets</li> <li>Credible and internally consistent assumptions, based on external benchmarks</li> <li>Developed in Autumn 2021, hence reflects the energy supply issues (notably gas) that were already apparent</li> <li>Developed to support FID</li> </ul>	The Policy Scenario provides a more relevant representation of the future power markets in GB and Germany compared to the FES 2021 scenarios.

*Note:* 1) Namely ENTSO-E, National Grid ESO, European Commission, and a range of European TSOs. 2) British Energy Security Strategy, available here: <u>https://www.gov.uk/government/publications/british-energy-security-strategy</u>

## Of the four NG ESO FES Scenarios, the Policy Scenario is most comparable to (but remains distinct from) the System Transformation Scenario

Input assum	ption Policy Scenario	System Transformation (FES 2021)	Commentary
1 CO2 prices	s €66/tCO2 in 2030 €250/tCO2 in 2050	<ul> <li>FES 2021 mid-case:</li> <li>€51/tCO2 in 2030 (FES high-case is €50.9/tCO2)</li> <li>€122/tCO2 in 2050 (FES high-case is €255.8/tCO2)</li> </ul>	<ul> <li>Policy Scenario is closer to the FES high-case, than the FES mid-case.</li> </ul>
2 Gas prices	<ul> <li>€22.5/MWh in 2025</li> <li>€23.4/MWh in 2030</li> <li>€27.6/MWh in 2050</li> </ul>	<ul> <li>FES 2021:</li> <li>€16.9/MWh in 2025</li> <li>€19.3/MWh in 2030</li> <li>€24.1/MWh in 2050</li> </ul>	<ul> <li>Close to FES 2021</li> </ul>
3 GB nuclea	<ul> <li>3.7GW in 2025</li> <li>3.7GW in 2030</li> <li>10.2GW in 2050</li> </ul>	<ul> <li>5.4GW in 2025</li> <li>5.8GW in 2030</li> <li>14.9GW in 2050</li> </ul>	<ul> <li>Greater level of caution over the build-out of new GB nuclear capacity under the Policy Scenario</li> </ul>
4 GB RES ca	<ul> <li>Onshore wind: 23GW in 2030, 41GW in 2050</li> <li>Offshore wind: 38GW in 2030, 93GW in 2050</li> <li>Solar: 25GW in 2030, 63GW in 2050</li> </ul>	<ul> <li>Onshore wind: 23GW in 2030, 31GW in 2050</li> <li>Offshore wind: 38GW in 2030, 95GW in 2050</li> <li>Solar: 25GW in 2030, 57GW in 2050</li> </ul>	<ul> <li>GB RES capacities are largely in line with the FES 2021 System Transformation Scenario</li> </ul>
5 GB IC capa	<ul> <li>acities</li> <li>11.7GW in 2030</li> <li>15.1GW in 2050</li> </ul>	<ul><li>15.9GW in 2030</li><li>19.6GW in 2050</li></ul>	<ul> <li>Lower expected build-out of new GB interconnectors under the Policy Scenario</li> </ul>

## We make use of the Plexos Integrated Energy Model<sup>1</sup> platform to estimate the impact of NeuConnect on GB wholesale markets



**Note:** 1) The Plexos<sup>®</sup> Integrated Energy Model platform is a dispatch optimisation tool used to forecast power market outcomes at an hourly granularity for a given set of inputs and constraints. The Plexos<sup>®</sup> platform is external to both FTI and NeuConnect, and is widely used by practitioners and Transmission System Operators globally.

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# Under NeuConnect's Policy Scenario, the cable's socio-economic welfare impact is greater than at IPA stage, and its consumer impact is positive

€m 350 324 300 251 250 200 171 133 174 150 100 50 2030 2035 2040 2045 2050 ——Congestion rents (2030 - 2050)

- The Policy Scenario reflects a state of the world in which European countries pursue accelerated decarbonisation policies ...
- ...such that Net Zero is achieved by 2050.

NeuConnect rents, Policy Scenario (€m)

- As a result, the penetration of renewables capacity is assumed to be significant and growing across Europe from 2030 to 2050...
- …while high CO2 prices prompt a decommissioning of existing thermal plants over time.

NeuConnect socio-economic welfare impact, Policy Scenario (Present value over 25 years, €m)<sup>1</sup>

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	Ofgem IPA (2017)	Policy Scenario (2021/2022)
NeuConnect costs	As per IPA submission	As per FPA submission
GB net socio- economic welfare impact	(€314m)	€127m
GB consumer welfare impact (incl. C&F impact)	€3,803m	€2,094m

- All figures above in 2020 prices, in €m
- Net socio-economic welfare impact takes into account NeuConnect's impact on: (i) consumer surplus; (ii) producer surplus; (iii) congestion rents earned by other interconnectors; (iv) its own congestion rents; and (v) its annualised costs.
- Under the Policy Scenario, NeuConnect has a greater net socioeconomic welfare impact in GB, relative to modelling performed at the IPA stage.

**Note:** 1) FTI-CL figures calculate the present value based on an interpolation of NeuConnect's socio-economic welfare impact between modelling years. We extend the analysis backwards to 2028 (setting the years 2028 and 2029 equal to the average of all five modelled years), and forward to 2052 (setting the year 2051 and 2052 equal to 2050). The total is discounted to 2028 at 3.5% discount rate.

## Wholesale price impact



### E N E R G Y

# Across most modelled years, NeuConnect has a downward impact on GB wholesale prices

### Average annual wholesale prices with and without NeuConnect, Policy Scenario (€/MWh)



#### Annual wholesale prices (2030 – 2050)

 Annual wholesale prices are expected to rise in both GB and Germany over time, due to expected increases in carbon prices and electricity demand, and a reduction in French nuclear capacity.

#### Annual wholesale price differential, earlier years (2030s)

- Across the 2030s the average yearly difference between GB and German prices is around €5/MWh.
- Throughout this period, average GB prices are higher than average German prices. Germany has a relatively higher RES mix than GB, with high DE solar output often leading to lower daytime prices in the 2030s.

### Annual wholesale price differential, later years (2040s onwards)

- The fall in French nuclear capacity in later years (from the early 2040s onwards) has a strong upward impact on German prices (to the point that they exceed GB prices).
- Prices continue to rise in both GB and Germany in later years, due to an increase in carbon prices.

## Average price differentials in hours when NeuConnect is flowing increase across the modelling period, and are greater for flows from GB to DE

#### NeuConnect flows and utilisation, Policy Scenario



The average price differentials are calculated for the periods when NeuConnect is flowing in the relevant direction (e.g. the highlighted figure of €18.1/MWh is the average price differential between GB and DE in the hours when NeuConnect flows from DE to GB in 2030).

- While average annual wholesale prices are broadly similar between GB and DE across the modelling period (see previous slide), the average price differential in hours when NeuConnect is flowing more than doubles by 2050...
- ...reflecting increased volatility in wholesale prices in the two countries.
- Volatility is driven both by an increased reliance on variable output from intermittent renewable generators...
- ...and rising carbon prices (which increases the marginal cost of the remaining thermal plants, and thereby the clearing price, when those thermal plants act as the marginal plant).
- With NeuConnect's annual flows relatively consistent across the modelling period, the increased price differential in periods when NeuConnect is flowing is a key driver of the increasing revenues in later years.
  - Across the 2030s, the majority of flows on NeuConnect are imports into GB, with relatively cheaper German power helping to lower prices in GB.
  - In 2045 and 2050, exports from GB make up a greater proportion of flows on NeuConnect. However, GB is still a net importer, and across the year cheap imports from DE outweigh the upward impact of GB exports on GB prices.

# Average price differentials in hours when NeuConnect is flowing increase across the modelling period, and are greater for flows from GB to DE

### NeuConnect flows and utilisation, Policy Scenario



	2030	2035	2040	2045	2050
countries GB /olatility	€64.8 is driven bot	€74.6 h by an inc	€72.2	€81.6	€98.5 riable
o <mark>b</mark> eput fr	om i€46.8	€49.8 eW	€47.0	€51.7	€57.9
when the With Neu Math Neu Mat	ining thermal ose thermal p Connect's a ge GB and D (ports), Poli	plants act a nnual flows DE prices, N Cy Scenari	s the marg relatively when pow	the clearing inal plant). consistent er flows o of the inci	across t out of reasing
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### E N E R G Y

### A significant volume of congestion rents can be earned on NeuConnect even when average wholesale prices converge

#### Congestion rents and wholesale prices – 1<sup>st</sup>-7<sup>th</sup> October 2030



Weekly average GB Hourly prices Rent (€ 000s) price = €83.5/MWh (€/MWh) 200 00 Weekly average DE price = €92.9/MWh 150 150 100 100 50 50 **7**7 0 0 Oct 02 Oct 03 Oct 04 Oct 06 Oct 07 Oct 01 Oct 05 GB-DE rent (€) ---- GB price (€/MWh) ---- DE price (€/MWh) Weekly avg GB price (€/MWh) Weekly avg DE price (€/MWh)

Congestion rents and wholesale prices – 1<sup>st</sup>-7<sup>th</sup> October 2050

- Interconnectors, including NeuConnect, can earn significant congestion rents even when the average wholesale prices of the countries they connect appear to converge.
- These graphs show hourly wholesale prices in GB and DE, and congestion rents forecasted for NeuConnect from 1<sup>st</sup> to 7<sup>th</sup> October in 2030 and 2050, respectively. Average GB and DE prices in those weeks are similar.
  - If in 2030 NeuConnect were to earn only the "weekly average" price differential of €6.2/MWh (€62.4 minus €56.2 per MWh), this would lead to a total weekly congestion revenue of €1.5m (168 hours x 1,400MW capacity x €6.2/MWh), assuming a 100% utilisation.
  - By contrast, in our modelling, hourly price volatility means that NeuConnect is forecast to earn €3.5m congestion revenues.
  - For **2050** the equivalent numbers are **€2.2m and €7.5m**.
- NeuConnect is therefore able to earn significant congestion rents, as it benefits from the volatility of GB and DE wholesale prices (rather than just their average levels) – driven both by the low correlation of RES output in GB and DE and rising carbon prices (increasing absolute prices).

Total rent earned in the week = €7.5m

### Socio-economic welfare impact



## The socio-economic welfare impact of NeuConnect is made up of five separate elements





# NeuConnect has a positive impact on GB social welfare in most modelled years, largely to the benefit of GB consumers

- In most years, NeuConnect facilitates GB consumer savings in wholesale electricity prices, providing an additional source of flexible supply that helps address periods of 'tightness' in the GB power system:
  - Across the 2030s, average wholesale prices are higher in GB than in Germany. With NeuConnect, the GB network makes use of relatively cheaper German generation, to the detriment of GB generators, with consumer surplus outweighing the lower producer surplus.
  - In 2035, NeuConnect helps to significantly lower prices during periods of low wind output, with the GB system particularly reliant on RES in the Policy Scenario.
- In 2040, consumers benefit from a slight fall in average wholesale prices across the year driven by imports on NeuConnect. GB producers also benefit, with NeuConnect allowing the export of GB wind power (in periods of relatively high German prices) that would otherwise be curtailed.
- In 2045, with NeuConnect, German prices rise above GB prices, causing increased exports of GB power to Germany. This drives a corresponding increase in GB prices (relative to a scenario without NeuConnect), to the benefit of GB producers and the detriment of GB consumers.
- In 2050, the average price differential between DE and GB narrows from €4.0/MWh to €1.6/MWh, reducing this impact on consumers. Furthermore, GB consumers benefit across the year, as the effect of imports lowering prices during system tightness in the spring months outweighs increased summer prices (when consumption is lower).

#### Impact of NeuConnect on GB social welfare (€ million)<sup>1,2</sup>



#### Impact of NeuConnect on GB wholesale prices (€/MWh)

	2030	2035	2040	2045	2050
Without NeuConnect	€57.2	€68.9	€72.8	€82.9	€94.3
With NeuConnect	€56.9	€66.3	€72.8	€83.1	€94.1
Impact of NeuConnect	(€0.2)	(€2.6)	(€0.0)	€0.2	(€0.2)

**Notes:** 1) Consumer surplus does not include the impact of the GB Cap & Floor regime's Floor contributions and Cap benefits; 2) Figures presented here exclude the impact of 7 outlier hours in 2035, which were manually removed from the GB and DE results; 3) The total is based on an interpolation of the in-year 'Change in consumer surplus' between modelling years. We extend the analysis backwards to 2028 (setting the years 2028 and 2029 equal to the average of all five modelled years), and forward to 2052 (setting the year 2051 and 2052 equal to 2050). The total is discounted to 2028 at 3.5% discount rate.

# Impact of the GB Cap & Floor on GB consumer welfare



# GB consumer welfare is also affected by payments made to, and received from, NeuConnect under the GB Cap & Floor regime

#### Assessing the additional impact on GB consumer welfare

- FTI-CL has analysed the impact of NeuConnect on GB's socio-economic welfare using two different sets of costs received from NeuConnect:
  - Cost estimates consistent with those submitted as part of the FPA (as of December 2021).
  - Cost estimates consistent with NeuConnect's latest cost estimates (as of April 2022).
- These cost estimates are used to estimate the Cap & Floor level applicable to NeuConnect, and in turn, affect the payments to GB consumers if revenues are above the Cap, and payments from GB consumers to NeuConnect if revenues are below the Floor.

Estimated NeuConnect costs, Cap and Floor, £m (FPA and revised estimates) <sup>1</sup>		We understand from NeuConnect that, in the course of March 2022, some contracts were signed and actions undertaken by NeuConnect's contractors (such as booking metals) that, in th context of disruptions to the supply chain caused by the war i Ukraine, led to price increases and hence changes in costs.	
	Units	FPA cost estimates – and corresponding Cap & Floor I	d Latest cost estimates – and level corresponding Cap & Floor levels
Total Costs	£m	3,284	3,409
Floor	£m	72.2	75.1
Сар	£m	146.5	153.9

## With Cap and Floor levels consistent with <u>FPA cost estimates</u>, a small volume of Floor payments may be required from consumers in early years



- We have assumed specific Cap and Floor levels as directed by NeuConnect, which we understand reflect NeuConnect's own cost estimates as at the FPA stage.
- NeuConnect's revenues are expected to stay within the Cap and Floor for most of its asset life.
- We assume a Cap of £146.5m based on the 2022 FPA (converted to €171.7m). NeuConnect revenues are forecasted to be below the Cap across the asset's life, although close to exceeding the Cap in the final years of the modelling period.
- We estimate a Floor of £72.2m, again based on the 2022 FPA (converted to €84.6m). NeuConnect's revenues are expected to fall slightly below the Floor in the early 2030s, but stay above the Floor from 2035 onwards.
- The cost base used to calculate the Cap and Floor levels include a developer premium. Excluding these costs would reduce both the floor and the cap levels. To the extent that NeuConnect may be able to earn revenues close to the cap levels, this approach would tend to reduce the returns to the project (as a greater share of revenues would be passed on to GB consumers).

## With Cap and Floor levels corresponding to NeuConnect's <u>latest cost</u> <u>estimates</u>, the volume of Floor payments remains small

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- NeuConnect's revised cost estimates result in a small increase in the estimated level of the Cap and Floor.
- We have assumed specific Cap and Floor levels as directed by NeuConnect, which we understand reflect NeuConnect's own latest cost estimates.
- NeuConnect's revenues are expected to stay within the Cap and Floor for most of its asset life.
- We assume a Cap of £153.9m (converted to €180.3m). NeuConnect revenues are forecasted to be below the Cap across the asset's life, although close to exceeding the Cap in the final years of the modelling period.
- We estimate a Floor of £75.1m (converted to €88.0m). NeuConnect's revenues are expected to fall slightly below the Floor in the early 2030s, but stay above the Floor from 2035 onwards.
- We understand that Ofgem is currently reviewing NeuConnect's costs as part of the FPA process. The Cap & Floor levels shown in the figure above are dependent on the costs allowed by Ofgem. If Ofgem were to disallow certain costs, the impact on consumers would be positive (as both the cap and floor levels would be reduced). Our analysis therefore shows the most conservative estimate of likely benefits of NeuConnect for GB<sup>22</sup> consumers from the C&F regime.

## Under NeuConnect's Policy Scenario, with <u>FPA costs</u>, GB consumers are expected to benefit by a total of €2.09bn<sup>1</sup>

- Due to NeuConnect, the total wholesale cost of electricity faced by GB consumers (also known as the cost to load) falls by €2.11bn on a present value basis.
  - This is equivalent to a €2.11bn increase in consumer surplus.
- However, in the early 2030s, NeuConnect's intrinsic congestion revenues fall below the estimated Floor level (based on FPA cost estimates), requiring small payments from consumers. These transfers total €15m on a present value basis.
- After deducting these transfers, we estimate that NeuConnect leads to a net increase in GB consumer surplus of €2.09bn.
- Note that, for GB overall, the net impact of the C&F regime is nil, since these payments represent a transfer between NeuConnect and GB consumers.

Impact of NeuConnect on GB consumer surplus (€ million)



Change in GB consumer welfare due to Cap & Floor transfers

- Change in GB consumer welfare due to wholesale prices
- Total GB consumer welfare impact

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## With NeuConnect's latest cost estimates, the benefit to GB consumers falls slightly, to a total benefit of €2.08bn<sup>1</sup>

- Due to NeuConnect, the total wholesale cost of electricity faced by GB consumers (also known as the cost to load) falls by €2.11bn on a present value basis.
  - This is equivalent to a €2.11bn increase in consumer surplus.
- However, in the early 2030s, NeuConnect's revenues fall below the estimated Floor level. This impact is slightly increased under NeuConnect's revised cost estimates, requiring transfers from consumers totalling €25m on a present value basis.
- After deducting these transfers, we estimate that NeuConnect leads to a net increase in GB consumer surplus of €2.08bn.
- Note that, for GB overall, the net impact of the C&F regime is nil, since these payments represent a transfer between NeuConnect and GB consumers.

Impact of NeuConnect on GB consumer surplus (€ million)



Change in GB consumer welfare due to Cap & Floor transfers

- Change in GB consumer welfare due to wholesale prices
- Total GB consumer welfare impact

**Note:** 1) FTI-CL figures calculate the present value based on an interpolation of NeuConnect's socio-economic welfare impact between modelling years. We extend the analysis backwards to 2028 (setting the years 2028 and 2029 equal to the average of all five modelled years), and forward to 2052 (setting the year 2051 and 2052 equal to 2050). The total is discounted to 2028 at 3.5% discount rate.

## **Other benefits of NeuConnect**



# Interconnectors (including NeuConnect) are able to provide additional benefits beyond their impact on wholesale markets

Additional benefits of NeuConnect

### Security of Supply

- Reliable contributor to GB system security, as evidenced by interconnector participation in the GB Capacity Market
- Reducing clearing price for capacity market auctions and enables GB to achieve security of supply more affordably
- Diversification of energy sources insures against isolated system stress events/failures
- Relatively low correlation between GB and German renewables generation (i.e. when climate conditions in GB are such that windfarms/solar plants are not generating, it is more likely that their German equivalents are generating) allows security of supply to be maintained with fewer GB thermal plants.

### **Ancillary services**

- Provides balancing services such as frequency response or reactive power
- Provides Black Start services to supply electricity for system restoration in the event of a grid outage
- Increases competition in provision of ancillary services which reduces cost necessary to maintain system stability

### Environmental

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- Increases access to renewable generation capacity by allowing the UK to gain access to German renewables
- Each country benefits from the other's surplus, helping to maximise the proportion of low-carbon electricity each system uses
- Reduces carbon emissions as renewable generation in DE can displace thermal generation in GB, and vice versa

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## The revenue estimates for NeuConnect are subject to several upside and downside risks



**Note:** For #1, #4 and #6, corresponding parameters are also likely to continuously change (in addition to changes to the mechanism). For example, GB CM de-rating factors and clearing prices are likely to change annually, and the volume of ancillary services procured by SOs is likely to change frequently.

### NeuConnect flows consistently reduce GB emissions by displacing thermal alternatives, and reduces offshore wind curtailment in DE



Change in GB and DE emissions with NeuConnect (MtCO<sub>2</sub>)

- Across the modelling period, flexibility provided by NeuConnect consistently lowers annual emissions in GB by displacing fossil-fuel powered alternatives.
- In Germany, this leads to an increase in emissions across the 2030s, with the power exported from DE to GB occasionally replaced by increased thermal generation. However, Europe-wide emissions fall in every year.
- Across Europe, the total impact of NeuConnect on carbon emissions is expected to be a reduction of 13.3 MtCO2<sup>1</sup>

Note: 1) Total impact on carbon emissions calculated by interpolating between modelling years. We extend the analysis backwards to 2028 (setting the years 2028 and 2029) equal to the average of all five modelled years), and forward to 2052 (setting the year 2051 and 2052 equal to 2050).

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Offshore wind curtailment with and without NeuConnect

## NeuConnect increases competition in the provision of ancillary services, which is likely to reduce costs

### Interconnectors may be able to provide several types of ancillary services

#### **Frequency management**

Rapid delivery or off-take of power from the transmission system

**Restoration services (a.k.a. Black Start)** 

The ability to supply power without relying on power from the transmission network

#### **Voltage control**

Maintaining system voltage within predetermined limits through the absorption and injection of reactive power In recent years, System Operators in GB and Germany have spent significant amounts on ancillary services

> Between 2013 and 2019, German TSOs spent between €270 million and €870 million per year, with no clear trend

#### 

NG ESO expenditure on ancillary services, 2015 – 2019 (£m)



Increased competition in provision of ancillary services is likely to reduce cost of maintaining system stability

### nationalgrid

#### From NGET's analysis:

"The potential consumer benefit is quantified by assessing the potential cost savings of procuring this service from the interconnector instead of more costly commercial frequency response products" <sup>1</sup>

"All three Window 2 projects [including NeuConnect] potentially generate considerable consumer benefit from the provision of Frequency Response services"<sup>1</sup>

## We have not included a quantitative estimate of ancillary services in our analysis, but it is reasonable to expect NeuConnect to be able to provide ancillary services (e.g. frequency response), to the benefit of GB consumers

# By participating in the GB Capacity Market, NeuConnect would increase supply which may lead to a decrease in the GB CM clearing price



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