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By email:
RIIOElectricityTransmission@ofgem.gov.uk

Dear Karen,

Eastern HVDC - Consultation on the project's Final Needs Case

SSE welcomes the opportunity to respond to this consultation, however, please note that this represents the views of SSE Renewables only, with 'SSE' utilised in this response interchangeably.

SSE is a leading generator of renewable electricity and one of the largest electricity network companies in the UK. We develop, own and operate low carbon infrastructure to support the net zero transition. This includes onshore and offshore wind, hydro power, electricity transmission and distribution grids, and efficient gas-fired generation, alongside providing energy products and services for businesses. We have interests across Great Britain and Northern Ireland, the Republic of Ireland, Japan, Spain, Portugal, Denmark, Poland and the United States of America.

SSE recently announced a £12.5bn Net Zero Acceleration programme which will see the company expand on its ambition to be the UK's clean energy champion. The new programme will see SSER deliver over a fifth of the UK's 50GW offshore wind target by 2030, including the world's largest offshore wind farm at Dogger Bank. We will also deliver investment in critical technologies such as onshore wind and hydro pumped storage.

Our Position

The transmission network has a fundamental role to play in achieving the UK's net zero ambitions by 2050. Urgent investment in transmission system reinforcements is necessary to accommodate the significant growth in generation and relieve an already constrained network. As such we are

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fully supportive of, and agree with, Ofgem's considered view that there is a clear consumer benefit in the Eastern HVDC projects progressing in the context of the proposed E2DC and E4D3 links.

In addressing the energy trilemma, namely the provision of secure, sustainable, and affordable energy, the Network Options Assessment (NOA) 20/21 report explored for the first time, wider offshore works in detail and the bridging NOA document issued in January 2022 further acknowledges the importance of incorporating the results of the Offshore Transmission Network Review (OTNR) and impact of the Holistic Network (HND) design proposals due to be announced later this year. SSE agrees with the acknowledgement of significant consumer and environmental benefits to be derived from a more integrated approach that includes co-ordination of offshore infrastructure but is eager to emphasise the time criticality of completing these links to support the rapid deployment of both offshore wind and the additional onshore renewable developments necessary to meet net zero targets. SSE therefore firmly supports Ofgem's conclusion that "*there is no reason to think that future offshore network co-ordination will have a material impact on the consumer benefit case for the TOs*" proposals for the two HVDC links that are part of the Eastern HVDC projects. In light of the urgent need for these projects to be delivered on time and the existing risk analysis already indicating the likelihood for delay to the E2DC project, SSE are keen to ensure that no additional delay is attributed to the selection of the delivery model. SSE therefore agrees with Ofgem's minded-to-decision to retain the two Eastern HVDC projects within the LOTI arrangements under RIIO.

We look forward to further engagement where appropriate as the EHVDC project progresses.

Yours sincerely,

Fiona Morrison
Regulation Manager