

EnBW/bp response: Offshore Transmission Network Review - Multi-Purpose Interconnectors:
Minded-to Decision on interim framework

Partner companies bp and EnBW are preferred bidders on two 60-year leases awarded by The Crown Estate in UK Offshore Wind Round 4 and have entered into an option to lease agreement for an 860km² lease by Crown Estate Scotland in the North Sea.

The partners intend to jointly develop and operate the leases to contribute to the UK's 50GW target and Scotland's 11GW target for 2030. The combined potential generating capacity of 5.9 GW is sufficient to power the equivalent of around 6 million UK households with clean electricity.

We will refer to "the JV" throughout our response, which refers to EnBW and bp's joint ventures in our UK Round 4 projects, Morgan and Mona and ScotWind project Morven as mentioned above. This response is from an EnBW/bp offshore wind perspective only.

1. Do you have any concerns with the minded-to decisions set out in Section 2?

The JV supports the conceptual ideas and the approach not to limit the framework to avoid limiting solutions applied within the MPI framework. It is noted that potential options presented within the HND process have included designs which allow for offshore transmission bootstraps combined with offshore generation and further present an option for future build out to incorporate interconnectors. Such an approach combines transmission licensing, OFTO, interconnectors and generators in one scheme. Will the framework be extended to accommodate transmission, OFTO and interconnector possibilities in one framework?

We would like to express our concern that trying to incorporate MPI within existing framework, might prove complicated and not implementable, so we are suggesting that a dedicated MPI licensee category would be more applicable.

At present only the OFTO licensing regime makes provision for a (generator) developer led infrastructure deployment with a clear auction process to enable unbundling in a scheduled approach. As MPI develops, the assets can be licensed under different regimes and may be necessary to extend auction process to MPIs, which do not fall under OFTO as their primary usage.

2. Do you have any comments or concerns with the updates provided on wider policy considerations, as set out in Section 3?

We do not have any concerns with wider policy consideration proposed on conceptual level in the consultation. However, we would be grateful if important policy changes could be consulted on in order for projects to be able to comment on the implementation and impact on our projects.