



John Greasley
North Sea Stakeholder Manager
National Grid Ventures
35 Homer Road
Solihull
B91 3QJ
John.greasley@nationalgrid.com
07836 357137

Ofgem
10, South Colonnade
Canary Wharf
London
E14 4PU

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Dear Ofgem,

National Grid Ventures (NGV) welcomes the opportunity to respond to the Ofgem document **‘Minded-to Decision and further consultation on Pathway to 2030’**. NGV has successfully developed and now successfully operates several point to point (P2P) interconnectors into GB. We are developing a number of multi-purpose interconnectors (MPIs) and have put these projects forward, opting into the “Early Opportunities” workstream as part of the Offshore Transmission Network Review process. NGV notes that MPIs are not specifically covered by the Pathway to 2030 workstream of the OTNR.

The consultation highlights the work that has been led by the ESO to develop the Holistic Network Design (HND) and that this consultation is contemplating how Ofgem intends that network to be delivered. As the HND has now been published and discussed in detail at an industry webinar on 12 July 2022, it is possible to consider how the proposals set out in the consultation will apply to the real-life challenges to deliver this network in a timely and efficient manner.

The consultation states that there will need to be a delineation between onshore and offshore assets and that this delineation will be established following completion of the HND. It is hard to comment comprehensively on the proposals in the consultation – particularly for co-ordinated non-radial assets for delivery by the very late competition model – without knowing what assets required to deliver HND will be in or out of scope, and we urge Ofgem to complete this delineation as soon as is possible.

NGV notes that for non-radial offshore assets connecting more than one windfarm, the proposals in this consultation rely on developers cooperating and coordinating connection solutions amongst themselves. Whilst there should be an aspiration that this is able to happen, there could be valid circumstances where cooperation and hence coordination is not possible. The proposals in the consultation do not seem to consider this outcome, and NGV recommends that Ofgem provide guidance on what would happen if this were to be the case. For example, if two developers had two

competing designs (perhaps from different technology providers) and could not agree which one to take forward, who would be the arbiter to make the decision?

Decision on delivery of radial assets and non-radial assets in scope of Pathway to 2030 (sections 2 and 3, questions 1 and 2)

NGV understands the rationale of retaining the existing generator build and OFTO build models for Developers where the HND indicates a radial solution. We consider that this is the best way to facilitate timely delivery of those projects in scope.

NGV notes the proposal of also using the 'very-late' competition model for non-radial assets and the rationale that has been developed to support it. NGV considers that the urgency of delivering a co-ordinated process for Pathway to 2030 projects outweighs other issues and hence the 'very-late' model is likely to be the only model that can deliver in time due to the similarities with the existing processes for radial solutions. We note above the practical issues associated with identifying the assets to be delivered by the very late competition model and the cooperation between developers that will be required.

NGV does not consider that this delivery model should be used in the enduring regime, and notes that there will be future consultations on this topic. NGV recommends that the projects in scope of Pathway to 2030 (and hence this consultation) are clearly identified as soon as possible and that this scope should not be extended ahead of the development of the enduring regime.

Pathway to 2030 - Gateway assessment process (section 4)

NGV notes Ofgem's proposals for introducing a gateway assessment process. We agree that further detail on the proposals is needed, and welcome Ofgem's comment to publish more detailed guidance and submission requirements document. Our responses to the consultation questions are provided below noting that further detail is required to comment comprehensively.

Question 3: Do you agree with the proposed introduction of a new Tender Entry Condition in the Tender Regulations requiring the confirmation of the offshore transmission system as 'economic, efficient and coordinated'?

NGV agrees with this proposal.

Question 4: Do you agree with the introduction of the proposed gateway stage assessment process?

NGV agrees with this proposal.

Question 5: Do you think the information sought as part of the gateway assessment process is appropriate and proportionate? Is anything missing?

The information sought as part of the gateway assessment process seems reasonable and proportionate. NGV considers that Ofgem should seek to provide absolute clarity on these requirements as soon as is possible to provide certainty to Developers, particularly to cover circumstances where proposals differ significantly from the HND.

Question 6: Do you have any views on the timing of the gateway assessment process?

The consultation (paragraph 4.13) states that Ofgem would aim to conclude its assessment 'as soon as reasonably practicable'. NGV agrees that this assessment needs to be concluded as soon as is possible, but that clear timescales should apply to Ofgem to provide certainty to Developers.

Question 7: Is there any other information which you believe should be included in the confirmation to developers?

The information set out in the consultation document appears to be appropriate.

Very Late Competition Model Tender policy and Policy considerations for implementing non-radial offshore transmission (section 5 and 6, questions 8, 9 and 10)

NGV has no specific comments to make on these sections/questions other than to say that any new processes need to be carefully designed to ensure that any delays they introduce into existing processes are minimised.

This response is not confidential, and we are happy for Ofgem to publish it on its website. Please contact me if you require any further information.

Yours faithfully

John Greasley

North Sea Stakeholder Manager

National Grid Ventures