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Dear Ofgem,

National Grid Ventures (NGV) welcomes the opportunity to respond to the Ofgem document **'Revised 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 three multi-purpose interconnectors (MPIs), which have satisfied Ofgem's eligibility requirements and two are progressing as Pilot projects.

NGV responded to the original minded-to decision on Pathway to 2030 in July 2022, and is pleased that, having considered the responses received, Ofgem has decided to revise its minded-to position. Our comments on the revised minded-to position, including our responses to the specific questions posed by Ofgem are set out below.

Chapter 2 – Amend scope of this workstream

NGV notes that, in Chapter 2, Ofgem states it will extend these PT2030 proposals to Celtic Seas projects (4GW by 2035). We understand and agree with the rationale that this will provide more certainty to bidders ahead of The Crown Estate's leasing round that will take place in 2023. NGV notes that the OTNR has effectively been split into pre-2030 arrangements (Early Opportunities and Pathway to 2030) and post 2030 arrangements (Enduring Regime). NGV also notes that the expected consultation on proposals for the Enduring Regime was not issued during 2022, and we would like to seek assurance that the revised minded-to position from Ofgem will not evolve into the enduring arrangements 'by default'. NGV believes that an early competition model should be considered for the Enduring Regime as this would encourage innovation and efficient outcomes for consumers.

Chapter 4. Revised Minded-to Decision on Delivery Models in PT2030

Question 1: Do you support the introduction of a late competition OFTO build model for non-radial offshore transmission assets?

NGV supports the introduction of a late competition OFTO build model for non-radial offshore transmission assets. We consider that increasing the options available to developers is a positive step in terms of meeting offshore wind targets.

We agree with Ofgem's statement that the development of a late competition OFTO build model for non-radial assets may take time. Development of this model needs careful consideration, especially in relation to the specific roles and responsibilities of all affected parties, and we look forward to further engagement from Ofgem on this.

Chapter 5. Minded-to Decision on Anticipatory Investment in PT2030

Question 2: Do you support the extension of AI policy to the projects within scope of the PT2030 workstream?

Yes, NGV welcomes the additional clarity provided by this consultation. Investor risks need to be covered appropriately, particularly if AI is being delivered in line with the HND.

Question 3: Do you agree with the proposed mechanics of charging (see Appendix 1) to take account of coordinated infrastructure

NGV does not have any comments to make on this question.

Additional remark

In our response to the original minded-to consultation on this, NGV raised concerns about the difficulty of ensuring efficient coordination between different (and sometimes, competing) organisations. The proposals for Pathway to 2030 now include offshore assets that could be delivered by TOs, OFTOs or developers (with eventual transfer to an OFTO). Indeed, some of the offshore nodes will have multiple different organisations connecting into them. NGV considers that this is a risk from a deliverability and operability angle, and careful consideration needs to be given as to how all these interfaces are managed.

Please contact me if you would like to discuss any aspect of this response.

Yours faithfully

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