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9th December 2022

By email:
offshorelicensing@ofgem.gov.uk

Dear Stuart,

Consultation on proposed modifications to Offshore Transmission licences

SSE Renewables (SSER) welcomes the opportunity to respond to this consultation, please note that this represents the views of SSER only as a separate response may be submitted by other SSE businesses.

About SSE

SSER is the UK and Ireland's clean energy champion with plans to expand globally to deliver the green energy the world needs. Its strategy is to lead the transition to a net zero future through the world-class development, construction and operation of renewable power assets and it is building more offshore wind energy than any other company in the world.

SSE Renewables is part of SSE plc, the UK-listed integrated energy group which is investing £12.5bn over the next five years, or £7m a day, to deliver a Net Zero Acceleration Programme to address climate change head on. This includes plans by SSE Renewables to double its installed renewable energy capacity to 8GW by 2026 and ambitious targets to treble capacity to over 13GW by 2031, increasing output fivefold to over 50TWh annual – enough to be able to power around 20 million homes each year.

Proposed modifications to Offshore Transmission Licences (OFTO Licences)

SSE Renewables is a trading name of SSE Renewables Limited which is a member of the SSE Group.

The Registered Office of SSE Renewables Limited is Inveralmond House 200 Dunkeld Road Perth PH1 3AQ. Registered in Scotland No. SC435847. [sserenewables.com](https://www.sserenewables.com)

1. Consequential licence modifications due to the end of the transition period

Minor changes to Amended Standard Condition E12-A1: Definitions and Interpretation (ASC E12-A1) in four OFTO licences, to make changes required to ensure that the licences are consistent with UK law at the end of the transition period following the United Kingdom's (UK) exit from the European Union.

SSER response

We recognise that this modification represents a levelling up exercise for the 4 OFTO licence holders granted licences during the period between Ofgem giving notice of its intentions and publishing the decision and therefore have no objections or additional comments.

[redacted]

4. Incremental capacity arrangements Part C of ASC E12-J4 (ASC E12-J4 Part C), to make it clear that all OFTOs can seek to recover costs where they have entered into an agreement with the system operator under Standard Licence Condition E17: Obligations in relation to offers for connection etc. (SLC E17) and the OFTO has incurred costs as a result of that agreement.

SSE Response

We acknowledge the need to clarify the wording in relation to the recovery of costs associated with the obligation to enter into agreements with the system operator and are comfortable that this modification will facilitate that.

We look forward to the opportunity to engage with Ofgem and BEIS further on this and related subjects.

Yours sincerely,

Julianne Duncan

Regulation Manager - Renewables