

Consultation

Informal consultation on the assessment of five 2023 Medium Sized Investment Project initial needs case submissions from SP Transmission

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We are consulting on five of SP Transmission's (SPT's) initial needs case submissions under the Medium Sized Investment Projects (MSIP) re-opener mechanism. We particularly welcome responses from people with an interest in electricity transmission and distribution networks. We also welcome responses from other stakeholders and the public.

This document outlines the scope and purpose of the consultation, the consultation questions, and explains how you can get involved. Once the consultation is closed, we will consider all responses. We want to be transparent in our consultations. We will publish the non-confidential responses we receive alongside a decision on next steps on our website at [ofgem.gov.uk/consultations](https://www.ofgem.gov.uk/consultations). If you want your response – in whole or in part – to be considered confidential, please tell us in your response and explain why. Please clearly mark the parts of your response that you consider to be confidential, and if possible, put the confidential material in separate appendices to your response.

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1. Introduction

- 1.1 Network companies are natural monopolies. Effective regulation of privatised for profit monopolies is essential to ensure they cannot unfairly exercise their monopoly power to the detriment of their customers. This is particularly important in the case of essential utilities, such as energy, where consumers have no choice on whether or not to pay what they are charged. It is therefore crucial that an effective regulator protects energy consumers by controlling how much network companies can charge their customers. Ofgem does this through periodic price controls that are designed to ensure network companies are properly incentivised to deliver the best possible outcomes for current and future energy consumers. This includes ensuring that consumers only pay for investments that are needed and do not overpay for those investments.
- 1.2 The current price control model is known as RIIO (Revenue = Incentives + Innovation + Outputs). RIIO-ET2 is the second electricity price control under the RIIO model and runs from 1 April 2021 until 31 March 2026. It includes a range of Uncertainty Mechanisms (UMs) that will allow us to assess applications for further funding during RIIO-ET2 as the need, cost or timing of proposed projects becomes clearer. This ensures that consumers fund projects only when there is clear evidence of benefit, and we have clarity on likely costs and cost efficiency. These mechanisms also ensure that the RIIO-ET2 price control has flexibility to adapt as the pathways to Net Zero become clearer.
- 1.3 Where possible, we have set automatic UMs, such as the Generation and Demand Connection Volume Drivers, which provide Electricity Transmission Owners (ETOs) with immediate funding when they are required to undertake new customer connection works. In other areas, where the degree of uncertainty is too great to allow for an automatic mechanism, we set “re-openers” which will allow us to assess ETO proposals robustly, once information with sufficient accuracy is made available.
- 1.4 The MSIP re-opener provides ETOs with an annual opportunity to request additional funding for sub £100m projects, many of which may be critical for achieving Net Zero targets. It was developed to ensure that ETOs are able to undertake necessary investments in the transmission network, funding for which has not been provided in RIIO baseline allowances.
- 1.5 An ETO can submit a request for additional funding via the MSIP re-opener during specific “windows” (between 24 and 30 April 2021 and between 25 and 31

January in each subsequent regulatory year of the price control period) where it considers and the Authority agrees that a project is covered under the areas listed in RIIO-ET2 Final Determinations (FDs), as implemented by Special Condition 3.14.6 of its licence.¹ Projects within the scope of that licence condition will be considered and scrutinised by Ofgem to establish the level of efficient costs to be remunerated. For the applications covered in this consultation, we have only assessed SPT's initial needs cases and we will assess the full submissions, including costs, when SPT submits them at a later date.

1.6 In the January 2023 reopener window, SPT submitted eight applications, of which five are initial needs case submissions and the remaining three are full applications. This document summarises our assessment of the five initial needs case submissions as listed below. We will separately consult on our assessment of the full applications at a later date.

- 1) Kincardine North 400kV Substation: construction of a new 400kV substation near Kincardine and decommissioning of the Longannet 275kV substation
- 2) Kincardine - Wishaw (Clyde's Mill) 400kV Reinforcement: construction of a new 400kV substation at Clyde's Mill and a single circuit from Kincardine North to Clyde's Mill
- 3) XH and XJ Routes Overhead Line (OHL) Upgrading Works: upgrading of the existing 73.6km OHL conductor system on the strategic east-west Strathaven-Smeaton corridor
- 4) Glenglass 132kV Substation: reinforcement of the existing Glenglass 132kV substation for the connection of 2 x 132/33kV grid transformers, 4 circuits and 3 wind farms
- 5) Enoch Hill Collector Substation and Associated 132kV Circuit: construction of a new 132/33kV substation at Enoch Hill (equipped with one 132/33kV transformer), installation of a new 132kV feeder bay at New Cumnock 132kV substation and an approximately 5km 132kV cable circuit from New Cumnock to Enoch Hill.

1.7 We welcome views from stakeholders on our draft determinations concerning the projects outlined in Chapters 2 to 6, which propose acceptance of the initial needs cases for all projects.

¹https://www.ofgem.gov.uk/sites/default/files/docs/2021/02/final_determination_nget_annex_revised.pdf (Table 12: Areas covered by the MSIP re-opener)

MSIP submission, assessment, and approval process

1.8 ETOs have a duty to provide connections to users and to develop and maintain an efficient, co-ordinated and economical transmission network. Therefore, it is for an ETO to decide when it is the right time to initiate a new project that may be needed during the RIIO-ET2 price control period.

1.9 Transmission projects can be driven by factors outside the direct control of the ETOs, for example where a customer requires a grid connection, and can mean that there is insufficient clarity over project need, optimal solutions, timing, and and/or efficient costs to align with:

- the fixed business planning timeframes of a periodic price control (such as RIIO-ET2) and
- the fixed submission window provided for in the licence.

Uncertainty can have a disproportionately adverse impact on development activity and work deemed necessary by ETOs to deliver a connection in a timely manner. Delays to work to progress the connection of low carbon generation, which would contribute towards meeting the Net Zero target, may lead to additional costs for GB consumers or adversely affect our ability to meet our targets.

1.10 As mentioned above, the MSIP re-opener² has been designed to allow ETOs to submit applications when there is more certainty over both needs and costs. Initial needs case submissions seek agreement in principle for the initial needs case and preferred option ahead of the full application.

1.11 We have not determined the efficient costs of the projects at this stage because the costs provided are only indicative. Efficient costs will be determined following our review of the full application when there will be sufficient information to allow us to assess the final needs case, project costs, associated outputs, and delivery dates. The licensee's full application must include all the information and evidence as set out in Chapter 3 of the Reopener Guidance³.

² Further details can be found in the MSIP licence condition ([Statutory consultation on modifications to the RIIO-2 Transmission, Gas Distribution and Electricity System Operator licence conditions | Ofgem](#)) and in Final Determinations ([RIIO-2 Final Determinations - Core Document \(REVISED\) \(ofgem.gov.uk\)](#))

³ Re-opener Guidance and Application Requirements Document (Version 3), 3rd April 2023: <https://www.ofgem.gov.uk/publications/re-opener-guidance-and-application-requirements-document-version-3>

- 1.12 It should be noted that although we accepted and assessed some initial needs case submissions during the 2022 and 2023 MSIP submission windows, we expect that future MSIP submissions will include all the information necessary for us to assess both the need and the efficient costs together.

What are we consulting on?

- 1.13 The MSIP licence condition⁴ provides for companies to make re-opener applications during the RIIO-2 price control period for projects planned to deliver 11 activities as specified in SpC 3.14.6.⁵ SPT considers that all of these projects relate to one or more of the specified activities and we agree. SPT's submission provides evidence that it considers sufficiently demonstrates a need for the projects, and for its preferred options, during RIIO-ET2.
- 1.14 SPT expects to submit the full applications for these projects in the 2024 re-opener window. However, ahead of the full applications it has submitted details of the initial needs case. We are informally consulting on the initial needs cases, and preferred options for the five projects.

Context and related publications

- 1.15 The scope of this consultation is limited to SPT's 5 initial needs case MSIP submissions listed above in paragraph 1.6. Additional information on these MSIPs can be found in the MSIP re-opener submission documents⁶ on SPT's website.
- 1.16 This document is intended to be read alongside:
- 1) RIIO-ET2 Re-opener Guidance and Application Requirements Document⁷
 - 2) SPT Electricity transmission licence Special Conditions (SpC 3.14).⁸

⁴ SPT Special Licence Conditions can be found in Licence Conditions – Zip File accessible at: [Statutory consultation on modifications to the RIIO-2 Transmission, Gas Distribution and Electricity System Operator licence conditions | Ofgem](#)

⁵ The MSIP activities under SpC 3.14.6 are listed in Appendix 1 for reference.

⁶ [MSIP Reopeners - SP Energy Networks](#)

⁷ <https://www.ofgem.gov.uk/sites/default/files/2023-03/Reopener%20Guidance%20and%20Application%20Requirements%20Version%203.pdf>

⁸ <https://www.ofgem.gov.uk/publications/decision-proposed-modifications-riio-2-transmission-gas-distribution-and-electricity-system-operator-licence-conditions-1-april-2022>

Consultation stages

- 1.17 This consultation will open on 28 June 2023 and close on 26 July 2023. We will review and publish the responses 14 days after the consultation closes. We will endeavour to publish our decision by September 2023.

Figure 1: Consultation stages

Stage 1	Stage 2	Stage 3	Stage 4
Consultation open	Consultation closes (awaiting decision). Deadline for responses	Responses reviewed and published	Consultation decision/policy statement
28/06/2023	26/07/2023	Mid-August 2023	September 2023

How to respond

- 1.18 We want to hear from anyone interested in this consultation. Please send your response to the person or team named on this document's front page.
- 1.19 We've asked for your feedback on each of the questions throughout. Please respond to each one as fully as you can.
- 1.20 We will publish non-confidential responses on our website at www.ofgem.gov.uk/consultations.

Your response, data and confidentiality

- 1.21 You can ask us to keep your response, or parts of your response, confidential. We'll respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.
- 1.22 If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we'll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.
- 1.23 If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in

domestic law following the UK's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

- 1.24 If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

General feedback

- 1.25 We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:

1. Do you have any comments about the overall process of this consultation?
2. Do you have any comments about its tone and content?
3. Was it easy to read and understand or could it have been better written?
4. Were its conclusions balanced?
5. Did it make reasoned recommendations for improvement?
6. Any further comments?

Please send any general feedback comments to stakeholders@ofgem.gov.uk

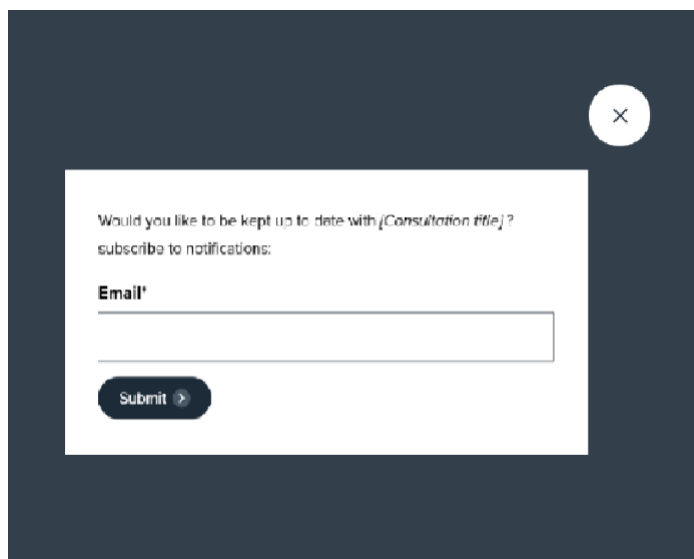
How to track the progress of the consultation

You can track the progress of a consultation from upcoming to decision status using the 'notify me' function on a consultation page when published on our website.

[Ofgem.gov.uk/consultations](https://www.ofgem.gov.uk/consultations)

Notify me +

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Once subscribed to the notifications for a particular consultation, you will receive an email to notify you when it has changed status. Our consultation stages are:

Upcoming > **Open** > **Closed** (awaiting decision) > **Closed** (with decision)

2. Kincardine North 400kV Substation project

Questions

- Q1. Do you agree with our draft view on the initial needs case for the Kincardine North 400kV Substation project?
- Q2. Do you agree with our draft view on the preferred option proposed by SPT?

- 2.1 In its January 2023 MSIP Re-opener submission, SPT set out its plan to construct Kincardine North 400kV Substation. The purpose of the project is to facilitate increased power transfer into and through the SPT network from renewable developments across the north of Scotland and to enable the decommissioning of Longannet 275kV Substation, which is now approaching its end of life.
- 2.2 We consider this project is eligible for application under the MSIP as it is “a Boundary Reinforcement Project that has received a NOA (Network Options Assessment) Proceed Signal in the most recent NOA” (MSIP specified activity c. under SpC 3.14.6).⁹ This project was given a ‘Proceed’ recommendation in January 2022 NOA (ref. NOA7 code LWUP)¹⁰ as well as in the July 2022 NOA refresh¹¹.

SPT’s initial needs case submission

- 2.3 Each year National Grid Electricity System Operator (NGESO) publishes its Future Energy Scenarios (FES), which provide an indication of the capacity requirements of the system based upon the potential future connection of generation and changing demand profiles. The 2021 and 2022 FES indicate that significant additional transmission capacity will be required through central and southern Scotland in order to accommodate the increases in onshore and offshore wind generation that are necessary to meet Net Zero targets.
- 2.4 This project has subsequently been given a NOA ‘Proceed’ recommendation (see paragraph 2.2 above) and identified as ‘Required for 2027’ through the Offshore Transmission Network Review (ONTR) Holistic Network Design (HND)¹².

⁹ The MSIP activities under SpC 3.14.6 are listed in Appendix 1 for reference.

¹⁰ <https://www.nationalgrideso.com/document/233081/download>

¹¹ <https://www.nationalgrideso.com/document/262981/download>

¹² <https://www.nationalgrideso.com/future-energy/pathway-2030-holistic-network-design> (ref. Appendix 1)

- 2.5 Replacement of Longannet 275kV Substation was originally included in SPT's RIIO-ET2 business plan. The need was accepted at that time, but due to interaction with other load-related drivers that were uncertain at the RIIO-ET2 FDs, we decided that it would not be appropriate to provide upfront funding and instead included it as a specified re-opener project under SpC 3.29. The intention was that SPT would apply for funding under SpC 3.29 if and when there is more certainty over the load-related drivers. This enabled SPT to consider integrating the load and non-load related drivers in an economic, efficient and co-ordinated manner. SPT has considered the load-related drivers as described from 2.2 to 2.4 above and proposed to include the decommissioning of Longannet 275kV Substation in this project. SPT has confirmed the re-opener under SpC 3.29 will not be required if the MSIP application is approved.

Our draft view of the initial needs case

- 2.6 Our draft view is that the initial needs case put forward by SPT is valid.
- 2.7 This position is supported by the following reasons:
- It enables significant reinforcement of transfer capacity through central Scotland. The additional transfer capacity is essential to connect planned onshore and offshore wind generation, and
 - The project integrated load investment drivers (ie the need for reinforcing transfer capacity) and non-load related investment drivers (ie the need for replacement Longannet 275kV substation) in an economic, efficient and co-ordinated manner.

Assessment of options and justification for the preferred option

- 2.8 SPT has considered the following five options:
- 1) Do Nothing or Delay
 - 2) New 400kV substation at Longannet
 - 3) New 400kV substation at/near Kincardine
 - a) New 400kV substation at existing Kincardine site
 - b) New 400kV substation at Kincardine North (preferred option)
 - 4) New 400kV and 275kV Air-insulated Switchgear (AIS) or Gas-insulated Switchgear (GIS) substations at/near Letham
- 2.9 We have undertaken a technical review of the solutions considered by SPT and are satisfied that SPT has suitably considered all viable options. The materials we

reviewed comprised of SPT's initial submission under the MSIP re-opener and responses to supplementary questions.

Option 1: Do nothing or Delay

- 2.10 SPT rejected this option because in its view it would be inconsistent with its various statutory duties¹³ and licence obligations. Timely replacement of Longannet 275kV Substation and the uprating of transfer capability through the SP Transmission system is crucial to ensure continued security and reliability of supply, to alleviate constraints on the GB transmission system, and to enabling necessary growth in renewable electricity in support of the transition to Net Zero.
- 2.11 We agree with SPT's rationale for rejecting this option as do nothing would not comply with its duty to develop and maintain an efficient, co-ordinated and economical system of electricity transmission.

Option 2: New 400kV substation at Longannet

- 2.12 This option involves constructing a new 10-bay 400kV GIS substation at Longannet, located in proximity to the existing 275kV substation. The indicative cost of this option is about £124m.
- 2.13 This option was proposed by SPT for further consideration by SPT. It was finally rejected by SPT because of its highest overall capital cost required among all feasible options considered and there are no additional benefits associated with the higher costs. The higher cost is due to the requirement of flood protection for Longannet site and the significant reconfiguration of overhead line routes.
- 2.14 We agree with SPT's consideration and rationale for rejecting this option.

Option 3: New 400kV substation at/near Kincardine

- 2.15 SPT has considered two sub-options:
- Option 3a: New 400kV substation at the existing Kincardine site
 - Option 3b: New 400kV substation at approximately 1.5km north of the existing Kincardine site (preferred option)

Option 3a: New 400kV substation at existing Kincardine site

- 2.16 This option involves constructing a new 10-bay 400kV substation at the existing

¹³ Statutory duties under section 9(2) of the [Electricity Act 1989 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1989/29/section/9)

Kincardine substation site. Although this option was proposed for further consideration, it was rejected by SPT prior to a detailed cost estimate being prepared.

2.17 SPT rejected this option because of its feasibility associated with the requirement for significant flood mitigation works, with associated cost, programme, environmental and ongoing operational risk. Its scope of work is also larger when compared to Option 3b.

2.18 We agree with SPT's rationale for rejecting this option.

Option 3b: New 400kV substation at Kincardine North (preferred option)

2.19 This option involves constructing a new 10-bay 400kV substation at, or in proximity to, the existing Kincardine substation site. The indicative cost of this option is about £98m.

2.20 Option 3b was selected by SPT as the preferred option to meet the initial needs case for this project. It has significantly lower capital cost relative to Option 2. Compared to Option 3a, this option avoided the requirement for significant flood mitigation works, and the associated cost, programme, environmental and operational risk.

2.21 We agree with SPT's consideration and rationale for selecting this option as the preferred option. There are a range of benefits that the option brings:

- It fulfils the NGESO's requirement for increasing the transfer capability of the SPT network.
- The site is above the flood plain, so no flood mitigation works are necessary.
- Future NOA schemes can be easily connected into the Kincardine North site utilising the existing circuits connecting to Longannet (these will be de-energised but retained when Longannet is decommissioned as proposed).
- There is a potential cost reduction if both this project and the Kincardine-Wishaw (Clyde's Mill) 400kV MSIP (details in Chapter 3) are approved because of the reduced requirement for a switchgear bay and associated cable systems at Kincardine 275kV substation.

Option 4: New 400kV and 275kV substations at/near Letham

2.22 This option involves constructing a new 10-bay 400kV substation at, or in proximity to, Letham.

- 2.23 SPT rejected this option prior to a detailed cost estimate being prepared, as the development of new 400kV and 275kV substation and overhead line infrastructure near Letham, on the western side of the Firth of Forth, would involve a significantly greater scope of work as compared to Options 2 or 3, with both cost and programme implications.
- 2.24 We agree with SPT's rationale for rejecting this option.

Our draft determination

- 2.25 We are satisfied that there is a need for the Kincardine North 400kV substation project, that SPT has considered all viable options, and that it has correctly rejected all options but one.
- 2.26 We are therefore proposing to accept the initial needs case for the Kincardine North 400kV substation project and the preferred option presented by SPT in addressing this needs case.

3. Kincardine - Wishaw (Clyde's Mill) 400kV Reinforcement project

Questions

- Q3. Do you agree with our draft view on the initial needs case for the Kincardine – Wishaw (Clyde's Mill) 400kV Reinforcement project?
- Q4. Do you agree with our draft view on the preferred option proposed by SPT?

- 3.1 The project proposed to establish a 400kV single circuit corridor, maximising the use of existing OHL assets prior to future NOA projects involving building new transmission routes, and to establish the Clyde's Mill 400kV substation. It assumes Kincardine North 400kV substation will be constructed, including a 400kV connection to Denny North substation as proposed in the Kincardine North 400kV substation project as detailed in Chapter 2.
- 3.2 We consider this project is eligible for application under the MSIP as it is "a Boundary Reinforcement Project that has received a NOA (Network Options Assessment) Proceed Signal in the most recent NOA" (MSIP specified activity c. under SpC 3.14.6).¹⁴ This project was given a 'Proceed' recommendation in January 2022 NOA (ref. NOA7 code DWUP)¹⁵ as well as in the July 2022 NOA refresh¹⁶.

SPT's initial needs case submission

- 3.3 SPT explained that the purpose of this project is to facilitate increased power transfer into and through the SPT network from renewable developments across the north of Scotland as mentioned in paragraph 2.3.
- 3.4 This project has subsequently been given a NOA 'Proceed' recommendation (see paragraph 3.2 above) and identified as 'Required for 2026' through the Offshore Transmission Network Review (ONTR) Holistic Network Design (HND)¹⁷.

Our draft view of initial needs case

- 3.5 Our draft view is that the initial needs case put forward by SPT is valid.

¹⁴ The MSIP activities under SpC 3.14.6 are listed in Appendix 1 for reference.

¹⁵ <https://www.nationalgrideso.com/document/233081/download>

¹⁶ <https://www.nationalgrideso.com/document/262981/download>

¹⁷ <https://www.nationalgrideso.com/future-energy/pathway-2030-holistic-network-design> (ref. Appendix 1)

- 3.6 We agree that the reinforced transfer capacity is essential for the connection of the planned onshore and offshore wind generation.

Assessment of options and justification for the preferred option

- 3.7 SPT has considered the following three options:
- 1) Do Nothing or Delay
 - 2) Construct a 400kV single circuit south from Kincardine North, on existing OHL routes, to Wishaw substation
 - 3) Construct a 400kV single circuit south from Kincardine North, on existing OHL routes, to a new Clyde's Mill 400kV substation (preferred option)
- 3.8 We have undertaken a technical review of the solutions considered by SPT and are satisfied that SPT has suitably considered all viable options. The materials we reviewed comprised of SPT's initial submission under the MSIP re-opener and responses to supplementary questions.

Option 1: Do nothing or Delay

- 3.9 SPT rejected this option because in its view it would be inconsistent with its various statutory duties and licence obligations. Timely uprating of transfer capability through the SP Transmission system is crucial to ensure continued security and reliability of supply, to alleviate constraints on the GB transmission system, and to enable necessary growth in renewable electricity in support of the transition to Net Zero.
- 3.10 We agree with SPT's rationale for rejecting this option because doing nothing would not be compliant with its duty to develop and maintain an efficient, co-ordinated and economical system of electricity transmission.¹⁸

Option 2: Establish a 400kV single circuit south from Kincardine North to Wishaw substation

- 3.11 This option involves constructing a 400kV single circuit connection, utilising existing overhead line routes as far as possible, from Kincardine North 400kV Substation to Wishaw 400kV Substation. The indicative cost for this option is around £61m.

¹⁸ Statutory duties under section 9(2) of the [Electricity Act 1989 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1989/29)

3.12 SPT considered this option to be a feasible option to delivering the required increase in transfer capability. After further consideration, SPT rejected it because:

- its capital cost was marginally higher than Option 3,
- it required a new section of OHL asset to be built, which would subsequently become a stranded asset in later stages of system reinforcement. This work also presented consenting and programme risk, and
- it reduced the number of supplying circuits, and therefore security of supply, to the demand groups in the proximity.

3.13 We agree with SPT's consideration and rationale for rejecting this option.

Option 3: Establish a 400kV single circuit south from Kincardine North to a new Clyde's Mill 400kV substation (preferred option)

3.14 This option involves establishing 400kV single circuit connection, utilising existing overhead line routes as far as possible, from Kincardine North 400kV Substation to a new Clyde's Mill 400kV Substation. The indicative cost of this option is around £59m.

3.15 This option was selected by SPT as the preferred option because, compared to Option 2, it delivers additional benefits and at a marginally lower capital cost. It retains the current number of supplying circuits to the demand groups in the proximity and hence the security of supply. It also avoids the need for a new section of OHL asset, which would be required in Option 2 (but will be stranded in later stages) as mentioned in paragraph 3.12.

3.16 We agree with SPT's consideration and rationale for selecting this option as the preferred option. There are a range of benefits that the option brings:

- It fulfils the NGESO's requirement for increasing the transfer capability of the SPT network.
- The scope of works proposed can accommodate future network expansion as required.
- There is a potential cost reduction if both this project and the Kincardine-North 400kV substation project (details in Chapter 2) are approved because of the reduced requirement for a switchgear bay and associated cable systems at Kincardine 275kV substation.

Our draft determination

- 3.17 We are satisfied that there is a need for the Kincardine - Wishaw (Clyde's Mill) 400kV Reinforcement project, that SPT has considered all viable options and that it has correctly rejected all options but one.
- 3.18 We are therefore proposing to accept the initial needs case for the Kincardine - Wishaw (Clyde's Mill) 400kV Reinforcement project and the preferred option presented by SPT in addressing this needs case.

4. XH and XJ Routes Overhead Line Upgrading

Works project

Questions

- Q5. Do you agree with our draft view on the initial needs case for the XH and XJ Routes Overhead Line Upgrading Works project?
- Q6. Do you agree with our draft view on the preferred option proposed by SPT?

- 4.1 XH and XJ routes are 400kV double circuit OHL routes that together form a strategic east - west corridor through the central belt of Scotland. XH and XJ routes connect Strathaven 400kV Substation in the west (XH route) to Smeaton 400kV Substation in the east (XJ route).
- 4.2 We consider this project is eligible for application under the MSIP as it is "a Boundary Reinforcement Project that has received a NOA (Network Options Assessment) Proceed Signal in the most recent NOA" (MSIP specified activity c. under SpC 3.14.6).¹⁹ This project was given a 'Proceed' recommendation in January 2022 NOA (ref. NOA7 code VSRE)²⁰ as well as in the July 2022 NOA refresh.²¹

SPT's initial needs case submission

- 4.3 Each year National Grid Electricity System Operator (NGESO) publishes its Future Energy Scenarios (FES), which provides an indication of the capacity requirements of the system based upon the potential future connection of generation and changing demand profiles. The 2021 and 2022 FES indicate that significant additional transmission capacity between Scotland and England will be required in the period to the end of the current decade and beyond in order to accommodate the increases in onshore and offshore wind generation that are necessary to meet Net Zero targets.
- 4.4 SPT explained that the purpose of this project is to facilitate increased power transfer from Scotland to England and to ensure timely modernisation of two strategic 400kV OHL routes.

¹⁹ The MSIP activities under SpC 3.14.6 are listed in Appendix 1 for reference.

²⁰ <https://www.nationalgrideso.com/document/233081/download>

²¹ <https://www.nationalgrideso.com/document/262981/download>

Our draft view of the initial needs case

- 4.5 Our draft view is that the initial needs case put forward by SPT is valid.
- 4.6 This position is supported by the following reasons:
- The completion of the XH and XJ OHL route uprating and modernisation work is required to maintain and operate an economic, efficient, and fit for purpose transmission system, and to allow SPT to satisfy network users' requests for connection, consistent with their statutory and licence responsibilities.
 - Replacing the existing phase conductor on XH and XJ routes with a High Temperature Low Sag (HTLS) conductor system will alleviate constraints on the GB transmission system and help to ensure the network is ready for the changes required by Net Zero targets.

Assessment of options and justification for the preferred option

- 4.7 SPT has considered the following six options:
- 1) Do Nothing or Delay
 - 2) Refurbish XH and XJ Routes with twin 425mm² All Aluminium Alloy Conductor (AAAC) (Totara)
 - 3) Refurbish XH and XJ Routes with twin 500mm² AAAC (Rubus)
 - 4) Refurbish XH and XJ Routes with a twin High Temperature Low Sag (HTLS) Conductor (preferred option)
 - 5) Replace XH and XJ Routes with new route of construction with twin 700mm² AAAC (Araucaria)
 - 6) Underground XH and XJ Routes
- 4.8 We have undertaken a technical review of the solutions considered by SPT and are satisfied that SPT has suitably considered all viable options. The materials we reviewed comprised of SPT's initial submission under the MSIP re-opener licence condition and responses to supplementary questions.

Option 1: Do nothing or Delay

- 4.9 SPT rejected this option because it does not comply with its various statutory duties²² and licence obligations. Due to OHL conductor condition, the lack of timely intervention would result in considerable risk to two of the most critical

²² Statutory duties under section 9(2) of the [Electricity Act 1989 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1989/29)

400kV double circuit OHL routes within the SPT area. Moreover, it would lead to accelerating deterioration of the OHL conductor and other OHL components.

- 4.10 We agree with SPT's rationale for rejecting this option because doing nothing would not be compliant with its duty to develop and maintain an efficient, co-ordinated and economical system of electricity transmission.²³

Option 2: Refurbish XH and XJ Routes with Twin 425mm² AAAC Totara

- 4.11 This option would involve major refurbishment of the routes with a twin 425mm² AAAC (Totara) conductor system due to the condition of the existing conductor.
- 4.12 It was rejected by SPT because the refurbishment no longer meets the transmission requirements identified via the NOA and the Offshore Transmission Network Review Holistic Network Design (OTNR HND).
- 4.13 We agree with SPT's rationale for rejecting this option.

Option 3: Refurbish XH and XJ Routes with Twin 500mm² AAAC Rubus

- 4.14 This option would involve the major refurbishment of the routes with a twin 500mm² AAAC (Rubus) conductor system.
- 4.15 It was rejected by SPT because the refurbishment would not comply with the transmission requirements identified via the NOA and the OTNR HND. This solution also involves additional steelwork and foundation reinforcement works and therefore leads to increased capital cost.
- 4.16 We agree with SPT's rationale for rejecting this option.

Option 4: Refurbish XH and XJ Routes with twin HTLS Conductor (preferred option)

- 4.17 This solution involves the major refurbishment of the routes with a twin HTLS conductor system and including the northern circuit on XH route. The major refurbishment removes the risks associated with the condition of the existing ACSR²⁴ conductor and meets the transmission system requirements identified via the NOA and the OTNR HND while delivering a significant incremental thermal capacity of not less than 880MVA per circuit.

²³ Statutory duties under section 9(2) of the [Electricity Act 1989 \(legislation.gov.uk\)](https://legislation.gov.uk)

²⁴ ACSR stands for "Aluminium Conductor Steel Reinforced"

- 4.18 This option was selected by SPT as the preferred option because it provides full functionality required to give XH and XJ routes a further 40 years of service without further major intervention.
- 4.19 We agree with SPT's consideration and rationale for selecting this option as the preferred option to meet the initial needs case. There are a range of benefits that the option brings:
- It is consistent with the transmission requirements identified via NOA and the OTNR HND.
 - It delivers a significant incremental thermal capacity of at least 880MVA per circuit.
 - It provides full functionality required to give XH and XJ routes a further 40 years of service without further major intervention.

Option 5: Replace XH and XJ Routes with new route of construction with twin 700mm² AAAC (Araucaria)

- 4.20 This option would involve the complete replacement of the existing XH and XJ routes with two new routes of construction with twin 700mm² AAAC (Araucaria).
- 4.21 SPT rejected this option because of its highest overall capital cost among all the options involving conductor replacement and does not deliver additional benefits.
- 4.22 We agree with SPT's rationale for rejecting this option.

Option 6: Underground XH and XJ Routes

- 4.23 This option would involve the replacement of XH and XJ OHL routes with 400kV underground cable circuits.
- 4.24 This option was rejected due to being uneconomic and not providing progress for further engineering consideration.
- 4.25 We agree with SPT's rationale for rejecting this option.

Our draft determination

- 4.26 We are satisfied that there is a need for the XH and XJ Routes Overhead Line Upgrading project, that SPT has considered all viable options and that it has correctly rejected all options but one.
- 4.27 We are therefore proposing to accept the initial needs case for the XH and XJ Routes Overhead Line Upgrading Works project and the preferred option presented by SPT in addressing this needs case.

5. Glenglass 132kV Substation project

Questions

- Q7. Do you agree with our draft view on the initial needs case for the Glenglass 132kV Substation MSIP project?
- Q8. Do you agree with our draft view on the preferred option proposed by SPT?

- 5.1 Glenglass 132kV substation is located near Sanquhar within a rural location with an adjacent water course named as Euchar Water. It comprises of seven feeder bays, two Transformer bays and a bus coupler bay.
- 5.2 We consider this project is eligible for application under the MSIP as it is “a Generation Connection project, including all infrastructure related to that project, the forecast costs of which are at least £4.24m more or less than the level that could be provided for under Special Condition 3.11 (Generation Connections volume driver)” (MSIP specified activity a. under SpC 3.14.6).²⁵ The indicative cost of this project is about £18m. The estimated difference between the forecast cost and the level of allowance under Generation Connections volume driver is £10.164m, which is higher than the above threshold.

SPT’s initial needs case submission

- 5.3 SPT advised that the construction of a new 132kV GIS substation at Glenglass will facilitate the connection of new renewable generation and the future extension of the southwest Scotland 132kV OHL network from Glenglass 132kV substation to the proposed Glenmuckloch 400/132kV substation. This will help maintain system resilience and operability.
- 5.4 SPT explained that reinforcement work at Glenglass 132kV Substation will enable the connection of an additional 321.6MW of contracted renewable generation capacity in the surrounding area. This will alleviate the need to constrain the renewable generation sources and will contribute towards a reduced reliance on fossil fuel electricity generation sources.

Our draft view of initial needs case

- 5.5 Our draft view is that the initial needs case put forward by SPT is valid.

²⁵ The MSIP activities under SpC 3.14.6 are listed in Appendix 1 for reference.

5.6 This position is supported by the following reasons:

- SPT is required to provide a connection in accordance with the statutory and regulatory requirements²⁶ under the terms of SPT's licence, including Licence Condition D4A²⁷, which requires SPT to offer to enter into an agreement with the ESO upon receipt of an application for connection.
- The proposed connection of low carbon generation supports legislated Net Zero targets.

Assessment of options and justification for the preferred option

5.7 SPT has considered the following five options:

- 1) Do Nothing or Delay
- 2) New 132kV AIS Substation at Glenglass
- 3) New 132kV AIS/GIS Substation at Alternative location between Blackhill and Glenglass 132kV substations
- 4) New 132kV AIS/GIS Substation at Alternative location to Glenglass between Glenglass and the future Glenmuckloch 132kV substation
- 5) New 132kV GIS Substation at Glenglass (preferred option)

5.8 We have undertaken a technical review of the solutions considered by SPT and are satisfied that SPT has suitably considered all viable options. The materials we reviewed comprised of SPT's initial submission under the MSIP re-opener licence condition and responses to supplementary questions.

Option 1: Do nothing or Delay

5.9 SPT rejected this option because it does not comply with its various statutory duties²⁸ and licence obligations. This includes Licence Conditions D3 and D4A, which require SPT to offer to enter into an agreement with the ESO upon receipt of an application for connection.

5.10 We agree with SPT's rationale for rejecting this option.

Option 2: New 132kV AIS Substation at Glenglass

5.11 This solution would involve the reinforcement of the Glenglass 132kV substation with the introduction of a 10 Bay, double busbar, 132kV AIS substation at the site. The indicative cost for this option is around £37m.

²⁶ Statutory duties under section 9(2) of the [Electricity Act 1989 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1989/29/section/9)

²⁷ [Electricity Transmission Standard Licence Conditions 24 07 2021 \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/consult/condld/standard/standard24072021/)

²⁸ Statutory duties under section 9(2) of the [Electricity Act 1989 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1989/29/section/9)

5.12 This option was rejected because it would require significant earthworks to provide a suitable substation platform to accommodate the 10 bay, 132kV AIS switchboard. This option also suffers from significant technical, economic, environmental, and potential programme disadvantages relative to Option 5 (preferred option).

5.13 We agree with SPT's rationale for rejecting this option.

Option 3: New 132kV AIS/GIS Substation at Alternative location between Blackhill and Glenglass 132kV substations

5.14 This option would involve the construction of a new 132kV AIS or GIS substation located between the Glenglass 132kV substation and Blackhill 132kV substation.

5.15 This option was rejected prior to an assessment of indicative cost because no location that would avoid extensive and costly earthworks or Blackhill - Glenglass OHL circuit modification could be identified for the development of a new 132kV AIS/GIS substation between Glenglass and Blackhill 132kV substations. This solution would also require some customers to have their existing 'Firm' connection agreement contracts changed to 'Non-Firm' connection agreement contracts.

5.16 We agree with SPT's rationale for rejecting this option.

Option 4: New 132kV AIS/GIS Substation at Alternative location to Glenglass between Glenglass and the future Glenmuckloch 132kV substation

5.17 This option would involve the construction of a new 132kV AIS or GIS substation located in an area between the existing Glenglass 132kV substation and the future Glenmuckloch 132kV substation.

5.18 This option was rejected prior to an assessment of indicative cost due to programme timeframe for this project to be delivered.

5.19 We agree with SPT's rationale for rejecting this option.

Option 5: New 132kV GIS Substation at Glenglass (preferred option)

5.20 This option would involve the reinforcement of the Glenglass 132kV substation with the introduction of a 10 Bay, double busbar, 132kV GIS switchboard at the site. The indicative cost of this project is about £18m.

- 5.21 This option was selected by SPT as the preferred option because it is the most economical solution, with the indicative cost significantly lower than option 2. There were also other technical and environmental advantages for this option including:
- The switchboard can be accommodated by extending the existing Glenglass 132kV substation footprint into land adjacent to the existing site.
 - It required significantly less earthworks and movement of spoil than other option.
 - The switchboard and substation building could accommodate further extension for future connection applications.
- 5.22 We agree with SPT's consideration and rationale for selecting this option as the preferred option to meet the initial needs case. There are a range of benefits that the option brings:
- It provides a more economical solution than the alternative option with lower capital cost.
 - It provides significant economic and technical benefits at the least risk to the environment in comparison to other options.

Our draft determination

- 5.23 We are satisfied that there is a need for the Glenglass 132kV Substation project, that SPT has considered all viable options and that it has correctly rejected all options but one.
- 5.24 We are therefore proposing to accept the initial needs case for the Glenglass 132kV Substation project and the preferred option presented by SPT in addressing this needs case.

6. Enoch Hill Collector Substation and Associated 132kV Circuit project

Questions

- Q9. Do you agree with our draft view on the initial needs case for the Enoch Hill Collector Substation and Associated 132kV Circuit project?
- Q10. Do you agree with our draft view on the preferred option proposed by SPT?

- 6.1 Enoch Hill Wind Farm is a proposed onshore wind development located approximately 6km southwest of the town of New Cumnock and 7km northeast of the town of Dalmellington in the East Ayrshire council area. It is approximately 3.5km east of SPT's existing New Cumnock 275/132kV Substation.
- 6.2 An application for connection in respect of the proposed 69MW Enoch Hill Wind Farm was first received in late 2014. The developer requested the new 132kV circuit from New Cumnock to Enoch Hill to be delivered via an underground cable as opposed to via an overhead line.
- 6.3 A bilateral connection agreement is currently in place between NGESO and the developer, RWE Renewables UK Onshore Wind Limited (RWE).
- 6.4 We consider this project is eligible for application under the MSIP as it is "a Generation Connection project, including all infrastructure related to that project, the forecast costs of which are at least £4.24m more or less than the level that could be provided for under Special Condition 3.11 (Generation Connections volume driver)" (MSIP specified activity a. under SpC 3.14.6).²⁹ The indicative cost of this project is about £14m. The estimated difference between the forecast cost and the level of allowance under Generation Connections volume driver is £7.67m, which is higher than the above threshold.

SPT's initial needs case submission

- 6.5 SPT advised that the construction of Enoch Hill 132/33kV collector substation will help maintain system resilience and operability by enabling the connection of new sources of renewable generation.
- 6.6 The Enoch Hill 132/33kV collector substation within the RIIO-T2 period will enable the connection of 79MW of contracted onshore wind generation. The timely

²⁹ The MSIP activities under SpC 3.14.6 are listed in Appendix 1 for reference.

connection of low carbon generation, such as onshore wind, plays a vital role in reaching legislated net zero targets.

Our draft view of the initial needs case

6.7 Our draft view is that the initial needs case put forward by SPT is valid.

6.8 This position is supported by the following reasons:

- SPT is required to complete the Enoch Hill collector substation in accordance with the statutory and licence responsibilities³⁰, including Licence Condition D4A³¹, which requires SPT to offer to enter into an agreement with the ESO upon receipt of an application for connection.
- Investing in transmission infrastructure at Enoch Hill 132/33kV Substation, and between Enoch Hill 132/33kV and New Cumnock 275/132kV Substations was identified as the most economic and efficient option.
- The proposed connection of low carbon generation supports legislated Net Zero targets.

Assessment of options and justification for the preferred option

6.9 SPT has considered the following three options:

- 1) Do Nothing or Delay
- 2) New 33kV circuit from Enoch Hill to New Cumnock
- 3) New 132kV circuit from Enoch Hill to New Cumnock (preferred option)

6.10 We have undertaken a technical review of the solutions considered by SPT and are satisfied that SPT has suitably considered all viable options. The materials we reviewed comprised of SPT's initial submission under the MSIP re-opener licence condition and responses to supplementary questions.

Option 1: Do nothing or Delay

6.11 SPT rejected this option because it does not comply with SPT's various statutory duties³² and licence obligations. This includes Licence Conditions D3 and D4A, which requires SPT to offer to enter into an agreement with the ESO upon receipt of an application for connection, or for modification to an existing connection.

6.12 We agree with SPT's rationale for rejecting this option.

³⁰ Statutory duties under section 9(2) of the [Electricity Act 1989 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1989/29/section/9)

³¹ [Electricity Transmission Standard Licence Conditions 24 07 2021 \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/consult/condld/standardlicenceconditions/standardlicenceconditions24072021)

³² Statutory duties under section 9(2) of the [Electricity Act 1989 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1989/29/section/9)

Option 2: New 33kV circuit from Enoch Hill to New Cumnock

- 6.13 This solution would involve the construction of a new 33kV underground cable circuit from Enoch Hill to New Cumnock 132kV 'Board C'. The indicative cost for this option is around £16m.
- 6.14 SPT rejected this option because this solution does not offer a lower cost option (capital costs for this alternative are higher relative to the preferred solution). This solution requires further extension of the New Cumnock substation and the installation of up to four cables per phase to achieve the required circuit rating. This resulted in higher cost without providing additional benefits.
- 6.15 We agree with SPT's consideration and rationale for rejecting this option.

Option 3: New 132kV circuit from Enoch Hill to New Cumnock (preferred option)

- 6.16 This solution involves the construction of a new 132kV underground cable circuit, requiring the installation of one 800mm² Aluminium cable per phase, from Enoch Hill to New Cumnock 132kV 'Board C'. The indicative cost for this option is around £14m.
- 6.17 This option was selected by SPT as the preferred option because it delivers the additional transmission capacity required at minimum overall capital cost.
- 6.18 We agree with SPT's consideration and rationale for selecting this option as the preferred option to meet the initial needs case. There are a range of benefits that the option brings:
- It provides a more economical solution than the alternative option (option 2) and delivers the additional transmission capacity required at minimum overall capital cost
 - The proposed solution allows the connection of an additional 79MW of contracted low carbon generation to New Cumnock 275/132kV Substation, of which 69MW is already consented.

Our draft determination

- 6.19 We are satisfied that there is a need for the Enoch Hill Collector Substation and Associated 132kV Circuit project, that SPT has considered all viable options and that it has correctly rejected all options but one.

- 6.20 We are therefore proposing to accept the initial needs case for the Enoch Hill Collector Substation and Associated 132kV Circuit project and the preferred option presented by SPT in addressing this needs case.

7. Conclusion and next steps

Next steps

- 7.1 We welcome your responses to this consultation, both generally, and in particular on the specific questions in Chapters 2 to 6. Please send your response to: Eliska.Antosova@ofgem.gov.uk. The deadline for response is 26 July 2023.
- 7.2 We will carefully consider all consultation responses and endeavour to conclude our assessment of the five SPT's MSIP initial needs case submissions with a provisional decision in September 2023. If our view does not move away from the draft determination, our provisional decision will confirm that SPT should be funded for the efficient delivery of the projects, subject to receipt of appropriate evidence regarding the project delivery and the associated costs.
- 7.3 Once the full applications including project costs with associated outputs, delivery dates and allowances to be detailed as PCDs are submitted in January 2024, we will assess and consult on the final needs case and efficiency of the proposed costs accordingly.

Appendices

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Appendix 1 – List of Activities under MSIP re-opener

The activities under MSIP re-opener are stipulated in SpC 3.14.6 and are listed below for reference.

- (a) a Generation Connection project, including all infrastructure related to that project, the forecast costs of which are at least £4.24m more or less than the level that could be provided for under Special Condition 3.11 (Generation Connections volume driver);
- (b) a Demand Connection project, including all infrastructure related to that project, the forecast costs of which are at least £4.24m more or less than the level that could be provided for under Special Condition 3.12 (Demand Connection volume driver);
- (c) a Boundary Reinforcement Project that has received a NOA Proceed Signal in the most recent NOA;
- (d) a Flooding Defence Project, the purpose of which is to follow:
 - i. updates to the Energy Networks Association's report titled 'Engineering Technical Report (ETR138)' guidance on flooding; or
 - ii. a request from government, or a body which has responsibility for flood prevention, to protect sites from flooding;
- (e) an Electricity System Restoration Project following the establishment of an Electricity System Restoration Standard;
- (f) a system operability or constraint management project that has been requested by the System Operator;
- (g) projects that are needed in order to meet NETS SQSS requirements regarding security, or system operability;
- (h) Harmonic Filtering projects that are needed following:
 - i. requests from the licensee's customers to aggregate and deliver Harmonic Filtering requirements; or
 - ii. system studies by the System Operator or the licensee showing a need for additional Harmonic Filtering on the National Electricity Transmission System;
- (i) protection projects that are needed following:
 - i. system studies by the System Operator or the licensee showing a need for changes to the protection settings or replacement of protection relay with inadequate range;
 - ii. system studies by the System Operator or the licensee showing a need for dynamic line ratings; or
 - iii. system studies by the System Operator or the licensee showing a need for an operational intertrip;
- (j) data transformation and improvement projects, to implement recommendations regarding specific outputs required to meet principles developed by industry data working groups; and
- (k) SF6 asset interventions, where the licensee can demonstrate a well-justified SF6 Intervention Plan.

Appendix 2 – Consultation Questions

Kincardine North 400 kV Substation

- Q1. Do you agree with our draft view on the initial needs case for the Kincardine North 400kV Substation project?
- Q2. Do you agree with our draft view on the preferred option proposed by SPT?

Kincardine-Wishaw (Clyde's Mill) 400 kV Reinforcement

- Q3. Do you agree with our draft view on the initial needs case for the Kincardine – Wishaw (Clyde's Mill) 400kV Reinforcement project?
- Q4. Do you agree with our draft view on the preferred option proposed by SPT?

XH/XJ Routes Overhead Line Upgrading Works

- Q5. Do you agree with our draft view on the initial needs case for the XH and XJ Routes Overhead Line Upgrading Works project?
- Q6. Do you agree with our draft view on the preferred option proposed by SPT?

Glenglass 132kV Substation

- Q7. Do you agree with our draft view on the initial needs case for the Glenglass 132kV Substation project?
- Q8. Do you agree with our draft view on the preferred option proposed by SPT?

Enoch Hill Collector Substation and Associated 132kV Circuit

- Q9. Do you agree with our draft view on the initial needs case for the Enoch Hill Collector Substation and Associated 132kV Circuit project?
- Q10. Do you agree with our draft view of the preferred option proposed by SPT?

Appendix 3 – Privacy notice on consultations

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, "Ofgem"). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

No external agencies.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for six months after the consultation is closed.

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services

- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas.

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system.

10. More information

For more information on how Ofgem processes your data, click on the link to our "[ofgem privacy promise](#)".