

James Dunshea
Ofgem – Price Control Operations
10 South Colonnade
Canary Wharf
London
E14 4PU

Electricity North West
Hartington Road, Preston,
Lancashire, PR1 8AF

Power cut? Call 105
General enquiries: 0800 195 4141
Email: enquiries@enwl.co.uk
Web: www.enwl.co.uk

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Email: paul.auckland@enwl.co.uk

Dear James,

ENWL response to Harker - Consultation on the project's final needs case

We are the electricity Distribution Network Operator (DNO) for the North West with our operating area covering Lancashire, Cumbria and Greater Manchester as well as parts of Yorkshire and Derbyshire. Our area covers a diversity of landscape and communities from the Lake District to urban Manchester and all the cities, towns and villages in-between. As the DNO for the North West we are responsible for maintaining and upgrading £12bn of electricity infrastructure across the region including 13,000km of overhead power lines and more than 44,000km of underground electricity cables and much more. We deliver over 25 terawatt hours of electricity through our network which is relied upon by over 5 million people across an area of 12,500km² whilst also investing one million pounds per day to provide a reliable, affordable, and sustainable network.

The proposed reinforcement works at Harker are critical to an increasing number of our customers and we have continued to work closely with NGESO and NGET to deliver the reinforcement project at Harker. It is key that delivery is assured for this project to ensure Distributed Energy Resource (DER) customers with acceptances can connect in the Cumbria area. A high-level overview of our response is outlined below with a detailed response in the Appendix of this letter.

- Harker is a **critical project** to enable DER connections for our customers and regional stakeholders in the wider Cumbria region
- We therefore **support the Harker project final needs case** and will continue to work with both NGET and the NGESO to ensure delivery of the project in 2026.

Should Ofgem wish to discuss our response further please don't hesitate to contact myself or Paul Auckland (Paul.Auckland@enwl.co.uk) in the first instance.

Yours sincerely

Gavin Anderson
Strategic and Compliance Planning Manager



Appendix – ENWL detailed response to consultation questions

This appendix expands on our summarised message in our covering letter and contains our detailed response to the specified questions in the published consultation document – ‘*Harker Consultation on the project’s Final Needs Case*’.

1. Do you agree with the need for investment on the transmission network?

We agree that the need for investment remains at Harker, driven by both the asset condition issues identified on the NGET 132kV infrastructure and the need for additional capacity to facilitate DER uptake in the wider Cumbria region. Currently ENWL customers have connection dates of 2026, and it is important from an ENWL stakeholder point of view that these dates are met.

2. Do you agree with our conclusions on the technical options considered?

We agree with the conclusions and technical options considered. In addition, we refer to paragraph 2.33, assurances on the use of SF6 free switchgear and assets from the consultation document.

While we see no issue with the 132kV Switchgear we don’t believe that the 400kV Switchgear has been assessed and passed conformity but based on the advance approval funds that NGET are preparing to commit to they appear positive. ENWL would be disappointed if this issue had a significant Impact and caused a potential delay to our customers 2026 connection dates.

3. Do you agree with the conclusions on the CBA?

We agree with the conclusions of the CBA, noting the cost difference between a greenfield build with GIS versus AIS. In addition, we refer to the following paragraph, 2.35 level of uncertainty over the generation.

ENWL believe that the ongoing works to facilitate further DER connections via the Strategic Connections Working Groups will continue to ensure the pipeline of DER remains strong across the country. DER applications remain buoyant in this area with ENWL now having a pipeline of connected and accepted to connect DER at Harker totalling 1.7GW, with a further 640MW offered. Please see table below for a high-level overview –

Status	Total MW
Connected	765
Accepted can connect	88
Accepted awaiting reinforcement	153
Accepted in Project Progression	723
Application offered not yet accepted	640

Therefore, ENW do not have any concern over uncertainty with generation here at Harker with reference to the figures above. Indeed, what we are seeing with greater needs for connections at Harker leads us to conclude the needs case for the work is growing stronger over time.

4. Do you agree with our minded to decision to retain the Harker project within the LOTI arrangement under RII0-ED2?

ENW believe that the timely delivery of the capacity is critical, and our key concern is that any additional time required to deliver a solution at Harker via arrangements other than the LOTI, will potentially have a damaging impact upon our customers’ ability to connect in 2026.

5. Do you agree with our proposed approach to LPD for Harker?

No Response - Insufficient information in the consultation document to allow us to form a view with regard to this question.