

Eliska Antosova  
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Canary Wharf  
London  
E14 4PU

16 October 2023

Dear Eliska,

This response is prepared on behalf of SSEN Transmission<sup>1</sup>, part of the SSE Group, responsible for the electricity transmission network in the north of Scotland.

We welcome the opportunity to respond to Ofgem's consultation on its initial needs case assessment of the Southwest Harmonic Filter project.

Since our submission on the needs case for this project in January 2023, the forecast generation background in the Argyll and Kintyre region has strengthened significantly, as set out in the Final Needs Case submission for our Argyll and Kintyre 275kV strategy<sup>2</sup>. This has further reinforced the need for an enduring harmonic filtering solution in order to resolve power quality issues in the region and reduce the risks these issues create for the system and its users and prevent the need for new customer connections to implement mitigation solutions on a case-by-case basis.

Due to the change in forecast background generation, ongoing developments with the Argyll and Kintyre 275kV strategy and supply chain issues, we now hold the view that it would be most appropriate to make a final funding submission for this project in the 2025 MSIP window. This will ensure we have the best level of information available in terms of filter specification, site selection and maturity of cost estimate.

Yours sincerely

Craig Molyneux  
Senior Regulation Analyst

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<sup>1</sup> Following a minority stake sale which completed in November 2022, SSEN Transmission is now owned 75% by SSE plc and 25% by Ontario Teachers' Pension Plan Board. SSEN Transmission encompass the licenced entity Scottish Hydro Electric Transmission Plc Registered in Scotland No. SC213461

<sup>2</sup> <https://www.ssen-transmission.co.uk/projects/project-map/argyll-and-kintyre-275kv-strategy/>

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## Appendix 1 – Responses to Ofgem Questions on Southwest Harmonic Filter

Question 1: Do you agree with our initial view on the initial needs case for the Southwest Harmonic Filter project?

Yes, we agree with the need for investment. The existing network infrastructure and any new infrastructure installed in the region is at risk due to the presence of harmonic distortion above the planning threshold for the system and show no trend towards resolution without physical intervention in the network.

Question 2: Do you agree with our initial view on the preferred option presented by SHET?

Yes, we agree with Ofgem's initial conclusions on the technical options considered. The preferred option of installing a harmonic filtering solution in the Kintyre region represents the best long-term value for consumers.