

Decision

Decision on the Early-Stage Assessment for Anticipatory Investment

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Contact:	Aliabbas Bhamani / Zahira Rafiq / Raquel Hughes
Team:	Offshore Coordination
Telephone:	020 7901 3902 / 020 3263 2755
Email:	offshore.coordination@ofgem.gov.uk

In May 2023 we launched a consultation seeking stakeholder views on our proposed approach to the implementation of the Early-Stage Assessment in the application of our Anticipatory Investment policy for offshore transmission (**our May 2023 Consultation**). This document summarises the responses we received to the consultation and provides our final policy positions.



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Any enquiries related to the text of this publication should be sent to Ofgem at:

10 South Colonnade, Canary Wharf, London, E14 4PU.

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Contents

Decision on the Early-Stage Assessment for Anticipatory Investment.....	1
Executive Summary	5
1. Introduction	6
Background.....	6
The OTNR and Early Opportunities	6
Anticipatory Investment	7
Anticipatory Investment and the Early-Stage Assessment.....	9
What we consulted on	10
Consultation Responses	10
Overview of Responses.....	10
Related Publications	12
General Feedback.....	13
2. Decision on our Approach to the Early-Stage Assessment	14
Decision Summary	14
Stakeholder Feedback and Ofgem Response.....	15
Question 1: Do you agree that the later user should assume responsibility for the construction of the coordinated solution should be the initial user become delayed? .	15
Question 2: Do you have any views on the Draft Early-Stage Assessment Guidance Document?	19
3. Decision on Output, Cost Allowances and Material Change	25
Decision Summary	25
Stakeholder Feedback and Ofgem Response.....	26
Question 3: Do you have any views on what should constitute material change for projects?	26
Question 4: Do you agree with Ofgem’s proposed approach to projects which experience material change?.....	27
Question 5: Do you agree with Ofgem’s proposed approach to cost disallowances in Anticipatory Investment?.....	28
4. Variations to Anticipatory Investment Policy.....	32
Coordinated Solutions with Multiple Later Users.....	32
Split Capacity Projects.....	33
5. Next Steps	35
Ancillary Documents and Guidance	35

6. Appendix 36
Appendix 1 – Glossary 37

Executive Summary

In our May 2023 Consultation¹, we sought views on our approach to the Early-Stage Assessment (**ESA**). The ESA has been established as part of the development of our policy of Anticipatory Investment. The purpose of the ESA is to provide developers with confidence that any Anticipatory Investment spent on coordinated infrastructure for offshore transmission will be treated as an allowable cost in any future cost assessment process. In doing so, we aim to reduce barriers to coordination.

We consulted on the design of this assessment, the interchangeability of the initial user of the assets and later user, our approach to cost allowances and material change.

The objective of this decision is to clearly set out the ESA and the policies which underpin it. This decision supports our ambition to enable investment in low carbon infrastructure at a fair cost for GB consumers as outlined in our Forward Work Programme published on 15 December 2021², and also supports Action 3 of Ofgem's Decarbonisation Action Plan published on 3 February 2020 to have more effective coordination in the delivery of low-cost offshore networks.³

The key outcomes from this decision are:

- We are giving developers the option to split the ESA into two stages, where costs can be submitted at a later point to account for the potential cost fluctuations and uncertainties at the initial stages of a project.
- We are increasing our cost allowance threshold to a 10% overspend, and we are upholding our position on a 10% underspend threshold.

Developers who have had their connection agreements split as a result of the Holistic Network Design (**HND**), Holistic Network Design Follow-up Exercise (**HNDFUE**) and the Centralised Strategic Network Plan (**CSNP**) will be considered for Anticipatory Investment.

¹ [Consultation on the Early-Stage Assessment for Anticipatory Investment | Ofgem](#)

² [Forward work programme 2021/22 Consultation | Ofgem](#)

³ [Ofgem decarbonisation programme action plan | Ofgem](#)

1. Introduction

Background

The OTNR and Early Opportunities

- 1.1. The Offshore Transmission Network Review (**OTNR**) was launched in July 2020.⁴ It had the objective of ensuring that transmission connections for offshore wind generation are delivered in the most appropriate way, considering the increased ambition for offshore wind to achieve net zero. In doing so, the OTNR aimed to find the appropriate balance between environmental, social and economic costs.
- 1.2. The Ten Point Plan for a Green Industrial Revolution published in November 2020 set out an ambitious target of 40GW of offshore wind by 2030.⁵ In April 2022, the government published a new British Energy Security Strategy⁶ which built on the previous offshore wind target and announced the government's ambition to deliver 50GW of offshore wind by 2030.
- 1.3. The OTNR was divided into four separate and distinct workstreams, two of which are specifically relevant for the scope of this publication. The Early Opportunities workstream sought to enable the developers of in-flight projects to pursue greater coordination and thereby realise the benefits of coordination in the near future. The intent was to achieve this by leveraging flexibility within the existing regulatory framework or by making near-term changes to it.
- 1.4. Pathway to 2030 (**PT2030**) was the medium-term workstream, covering largely the projects delivered the Crown Estate (**TCE**) Leasing Round 4 and Crown Estate Scotland (**CES**) Scotwind leasing round. These will make a significant contribution to the government's 50GW ambition for offshore wind by 2030.

⁴ [Offshore transmission network review - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/offshore-transmission-network-review)

⁵ [The Ten Point Plan for a Green Industrial Revolution](https://www.gov.uk/government/news/ten-point-plan-for-a-green-industrial-revolution)

⁶ [British Energy Security Strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/british-energy-security-strategy)

Anticipatory Investment

- 1.5. We use the term 'Anticipatory Investment' to refer to investment in offshore transmission infrastructure to support the later connection of a specific offshore development or developments. This is investment which goes beyond the needs of the immediate offshore development or developments.
- 1.6. We refer to the developers making the investment in the shared asset as the 'initial user'. We refer to the developer or developers that will use the shared asset in the future as the 'later user(s)'.
- 1.7. In our April 2022 consultation on our minded-to decision on Anticipatory Investment and the implementation of policy changes (**our April 2022 Consultation**)⁷, we identified that, under current regulatory arrangements, the management of the risk associated with Anticipatory Investment was one of the biggest barriers to greater coordination of offshore projects. The regulatory framework meant that developers were unable to recover any Anticipatory Investment through the cost assessment process, meaning that developers were not incentivised to build coordinated infrastructure which could be shared with later users.
- 1.8. We addressed this in our decision in October 2022⁸, where we upheld our minded-to position on the allocation of Anticipatory Investment risk between the consumer and later user(s) of shared transmission infrastructure. This policy is designed to enable developers to make Anticipatory Investment to deliver coordination while at the same time managing and mitigating the risk to consumers of that Anticipatory Investment.
- 1.9. Originally, the changes to our policy on Anticipatory Investment were applied specifically to projects within the scope of the Early Opportunities workstream, being those projects which were already in-flight.

⁷ [Offshore Coordination - Early Opportunities: Consultation on our Minded-to Decision on Anticipatory Investment and Implementation of Policy Changes | Ofgem](#)

⁸ [Decision on Anticipatory Investment and Implementation of Policy Changes | Ofgem](#)

- 1.10. Within the PT2030 workstream and undertaken by the Electricity System Operator (**ESO**), the HND was published in July 2022. The HND set out a single, first-of-its-kind, integrated design for connecting 23GW of offshore wind and represented a first step towards more centralised, strategic network planning. The HND will include non-radial offshore transmission assets. These may be for the benefit of later windfarms or may be used for wider network benefit, being used for the transmission of power from offshore generation to shore, but also for facilitating the dispatch of power from north to south.
- 1.11. These assets could potentially be built by developers making Anticipatory Investment on behalf of later users and in our public consultations on this workstream, stakeholders noted that there would be a benefit to the application of our Anticipatory Investment policy beyond the scope of the Early Opportunities workstream only. We recognised that by enabling the initial user to make Anticipatory Investment to complete these assets independently, we can better facilitate timely delivery.
- 1.12. In March 2023, we published a decision in relation to the extension of Anticipatory Investment to projects beyond the Early Opportunities workstream of the OTNR (**our March 2023 Decision**)⁹. Originally, Anticipatory Investment was only intended for in-flight projects, but in our March 2023 Decision we extended the policy to projects in earlier stages of development. We confirmed our position to extend the application of the AI policy developed in the Early Opportunities workstream to projects within scope of the PT2030 workstream, including all those projects in the HND and the soon-to-be published HND FUE. The HND FUE aims to provide in-scope developers with follow up recommendations on the integrated network design described in the HND.
- 1.13. The CSNP will be a plan for all load related network planning on the transmission network. In the future, we expect that any coordination between offshore assets will be decided through the CSNP. In due course, we plan to consult on extending our Anticipatory Investment policy to include projects within the scope of the CSNP.

⁹ [Decision on Pathway to 2030 | Ofgem](#)

Anticipatory Investment and the Early-Stage Assessment

1.14. The ESA will provide developers with confidence on whether any Anticipatory Investment spent on coordinated infrastructure will be recoverable through the final transfer value at the time of asset transfer to an OFTO. In particular the ESA will consider whether the Anticipatory Investment will:

- be an economic and efficient cost;
- be treated as an allowable cost in any future cost assessment process; and
- For developers in the PT2030 workstream, meet the needs set out in the HND/HNDFUE.

1.15. Our April 2022 Consultation considered that an appraisal at a sufficiently early stage to inform subsequent decision by developers relating to design, planning and procurement would be beneficial, leading to our commitment to introduce an ESA process. In our October 2022 decision on Anticipatory Investment and the implementation of policy changes¹⁰, we upheld our decision to introduce an ESA. In December 2022, we conducted a series of stakeholder engagement sessions to further consult on the ESA. Stakeholders requested clarity and guidelines on what should be submitted as part of this process and the framework for assessing submissions.

1.16. Our May 2023 Consultation set out our views on various aspects of the assessment framework and submission guidelines. A draft ESA guidance document¹¹ was published alongside this consultation as a supplementary document. This consultation sought views on the guidance document and provided reasoning on our approach to the ESA process. The feedback received to the consultation, alongside a series of subsequent stakeholder engagement sessions have informed this decision and our final guidance document.

¹⁰ [Decision on Anticipatory Investment and Implementation of Policy Changes | Ofgem](#)

¹¹ [Offshore Coordination - Early Opportunities: Draft Early-Stage Assessment Guidance Document | Ofgem](#)

What we consulted on

1.17. On 25 May 2023 we launched a 4-week consultation on our proposals for the ESA framework and submission guidelines, as well as how we apply our Anticipatory Investment policy. Within our May 2023 Consultation, we sought views on two key areas:

- Our approach to the ESA; and
- Output, Cost Allowances and Material Change

1.18. We set out each of the proposals above in greater detail in sections 2 and 3 of our May 2023 Consultation and asked a series of questions to stakeholders:

Our Approach to the Early-Stage Assessment

Question 1: Do you agree that the later user should assume responsibility for the construction of the coordinated solution should the initial user become delayed?

Question 2: Do you have any views on the Draft Early-Stage Assessment Guidance Document?

Output, Cost Allowances and Material change

Question 3: Do you have any views on what should constitute material change for projects?

Question 4: Do you agree with Ofgem’s proposed approach to projects which experience material change?

Question 5: Do you agree with Ofgem’s proposed approach to cost disallowances in Anticipatory Investment?

Consultation Responses

Overview of Responses

1.19. Our May 2023 Consultation closed on 26 June 2023 and received a total of seventeen responses from stakeholders.

- 1.20. Feedback received demonstrated broad agreement with our general approach to the ESA, acknowledging the value of providing early comfort to developers and of using a joint application format to encourage early cooperation between the initial user and the later user(s). Most respondents requested further consideration to our cost allowance and material change approach, calling for further flexibility given the newness of the Anticipatory Investment policy.
- 1.21. Although stakeholders were generally supportive of shared responsibility between users, they requested further clarity on how the transfer of responsibility between users will happen in practice. Stakeholders expressed concern at the viability of the later user(s) assuming construction responsibility. Respondents also requested greater emphasis on mitigating the risk of having to transfer the responsibility for construction to the later user altogether when possible.
- 1.22. Eleven out of the seventeen respondents found the draft ESA Guidance Document to be a useful basis for submitting an ESA application. There was consensus that the guidance should be subject to periodic review and some stakeholders suggested that the Guidance Document should address how the ESA process will apply to complex coordinated solutions, such as multiple later user(s), or when the initial and later user are the same entity.
- 1.23. Most stakeholders requested more detail on what constitutes material change in Anticipatory Investment and expressed concern over potential delays stemming from the proposed material change approach. These stakeholders often included their own examples of what should constitute material change. The most commonly proposed material change definitions referenced project timelines, cost projection and scope of the project.
- 1.24. The primary concern raised by stakeholders was that the proposed 5% overspend threshold is not adequate for an Early-Stage Assessment, where costs would still be at a premature stage in the development of the project. Most stakeholders expressed worries about inflation, uncertainty and risk leading to unforeseen price fluctuations. Many stakeholders also suggested alternative structural arrangements to our cost assessment framework altogether.
- 1.25. We conducted further stakeholder engagement sessions in the months which followed the consultation.

Related Publications

- 1.26. In July 2013, we published a [policy statement](#) on our previous approach to Anticipatory Investment.
- 1.27. In August 2020, the former Department for Business, Energy & Industrial Strategy (**BEIS**)¹² and Ofgem issued a [joint Open Letter](#) in which we called for stakeholder views to support the OTNR. In December 2020, we published a joint response to the Open Letter [response to the Open Letter](#) engagement.
- 1.28. In December 2020, the ESO published the [final report and supporting annexes](#) as part of Phase 1 of its Offshore Coordination Project. In Phase 1, the ESO assessed the costs and benefits of a coordinated offshore network, the technical considerations to achieve that, and how the offshore connections regime could change to support that.
- 1.29. In January 2022, we provided a summary of responses and an [update following our consultation](#) on changes intended to bring about greater coordination in the development of offshore energy networks.
- 1.30. In October 2022, we published our [decision on asset classification](#).
- 1.31. In December 2022, we published our [Revised Minded-to Decision and further consultation on delivery models in Pathway to 2030](#). This publication expanded the Anticipatory Investment policy to the PT2030 workstream.
- 1.32. In March 2023, we published our [Decision on the delivery model\(s\) for non-radial offshore transmission assets under the PT2030 workstream](#).
- 1.33. In May 2023, we published our [Consultation on the Early Stage Assessment for Anticipatory Investment](#). This decision responds to the feedback received in this last consultation.

¹² On 7 February 2023, the Department for Energy Security and Net Zero was established which took over energy policy responsibilities from the former BEIS.

General Feedback

1.34. We believe that feedback is at the heart of good policy development. We are keen to receive your comments about this report. We'd also like to get your answers to these questions:

1. Do you have any comments about the overall process of this report?
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. Are 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

2. Decision on our Approach to the Early-Stage Assessment

Section Summary

In this section, we outline the key feedback received from stakeholders and provide our final policy positions on our approach to the ESA. We largely focus on the interchangeability of the initial user and later user, and on the ESA Guidance Document.

Decision Summary

- 2.1. On initial user and later user interchangeability, we consider that it is the applicant's responsibility to determine whether an interchange is appropriate. Applicants are not mandated to undertake an interchange in the event that the initial user is delayed. Applicants should determine the roles and responsibilities of each user on a project-specific basis, and these should be captured in the required joint letter. As noted in our May 2023 Consultation, a joint letter will be required in which the later user acknowledges and accepts the initial user's intent to submit an ESA application, at a specific point in time, on their behalf. The joint letter should also include any transfer of responsibilities by the later user to complete the construction in the event of a delay to the initial user.
- 2.2. In respect of variations to the application, if a proposal materially changes after our assessment, then applicants will need to re-submit the parts of their application which are affected by the change. Applicants are encouraged to engage with us as early as possible so that we can determine if a re-assessment is required. We will ensure any such discussions are only to the extent necessary to fully assess the application. It is also important to note that none of the commercially sensitive information submitted to us as part of the ESA process will be available to the public.
- 2.3. We will now also consider ESO's HND Impact Assessment as part of the ESA process. It will be considered by us as supplementary information to support the applicant's proposal if they wish to refer to it.¹³

¹³ [Holistic Network Design Impact Assessment Process | August 2023](#)

- 2.4. Lastly, on the 'Eligibility Assessment', and the possibility of amending criteria so that applicants will need either an Agreement for Lease (**AfL**) or a connection agreement, we maintain that both items are required for the initial user and the later user(s). We will take into consideration any specific issues that may arise such as delayed connection agreements when assessing and applying the requirements. If a project fails to meet the eligibility criteria, we reserve the right to apply our discretion on this. We encourage any potential applicants who feel they may not meet the criteria to come forward and discuss their Anticipatory Investment proposals with us.

Stakeholder Feedback and Ofgem Response

Question 1: Do you agree that the later user should assume responsibility for the construction of the coordinated solution should the initial user become delayed?

- 2.5. We received seventeen responses to this question. Responses on whether the later user should assume responsibility for the construction of the coordinated solution should the initial user become delayed were mixed. Although nearly half of the total respondents agreed in varying capacities that the later user should assume responsibility, respondents also highlighted a number of key challenges which will need to be addressed should the later user take responsibility for building the shared asset.
- 2.6. Out of the seventeen respondents, seven agreed that the later user should assume responsibility for the construction of the coordinated solution should the initial user become delayed. Feedback from respondents who agreed largely indicated that by transferring the responsibility to the later user, project(s) can continue to move forward, and the benefits of the coordinated solution can be realised without significant disruption.
- 2.7. More than a quarter of the respondents who agreed believed that the later user should also be responsible for the delivery of an alternative coordinated solution, should the initial user be delayed, and should be allowed to amend the original Anticipatory Investment proposal. Respondents argued that the later user should have flexibility in changing infrastructure expected to be delivered if made responsible for delivery. Further information on what constitutes material change can be found in Chapter 3.
- 2.8. More than half of the respondents who agreed also requested greater clarity on what would happen if the initial user and later user(s) fail to reach an agreement on their

Anticipatory Investment proposal. One respondent stressed the need for a back-stop procedure for resolving disputes between developers and, where applicable, TOs. The respondent suggested that either Ofgem or the ESO should act as the mediator for the ESA process.

- 2.9. Eleven respondents also stressed how the practicalities of transferring ownership should not be underestimated, noting that it is essential that the later user(s) is an active participant in the process to ensure full buy-in and efficient transfer of responsibilities should the initial user delay or fall away.
- 2.10. One respondent also stressed the need for solutions to challenges such as large-scale liabilities at the very early development stage, or the unlikelihood of the later user having the financial resources needed to deliver the coordinated solution depending on the level of delay that is experienced. Similarly, the initial user may become delayed after having already negotiated the contracts for the shared infrastructure. In light of these challenges, the respondent suggested that the 'delay' should be assessed and quantified in terms of timelines and related liabilities. Another respondent recommended Ofgem clarify what level of delay would constitute a replacement of the initial user.
- 2.11. Out of the seventeen respondents, seven respondents neither agreed nor disagreed that the later user should assume responsibility for the construction of the coordinated solution should the initial user become delayed.
- 2.12. One of these seven respondents was conscious of the significant number of new risks to consider that are associated with delivering coordinated grid solutions via Anticipatory Investment. The respondent was especially concerned with the increased complexity of interfaces between multiple offshore wind developers and potentially onshore TOs. The respondent noted that further clarity on the roles and responsibilities of the different parties and at different stages of the development process may help better understand the feasibility of the later user's ability to assume responsibility.
- 2.13. Echoing the feedback of many, another respondent who neither agreed nor disagreed, noted that the complexity of "assuming responsibility" cannot be underestimated, especially in the instances in which multiple later user(s) are involved, meaning that multiple projects may connect to a shared asset built by a single initial user.

- 2.14. The same respondent also requested Ofgem to clarify whether the initial user should make the application jointly with the later user who is most likely to use the Anticipatory Investment or all the later user(s). The respondents also requested guidance on how these later user(s) should be determined. Further details on the feedback received and our approach to the multiple user concept can be found in Chapter 4.
- 2.15. Alternatively, one respondent expressed that the later user should have the option to consider whether they wish to take over the ESA process and associated Anticipatory Investment cost allowances or not as the later user may determine it is more appropriate to delay their project as opposed to assuming responsibility.
- 2.16. Similarly, one respondent stated that if the initial user withdraws from the process, is delayed indefinitely or if the coordinated design in development remains at an early stage of development, it may be more beneficial for the project to “pivot” into a radial counterfactual as this may produce a better outcome for consumers as opposed to proceeding with the original Anticipatory Investment proposal.
- 2.17. Another respondent suggested that any costs incurred by the later user for assuming responsibility for the delivery of the coordinated solution should be allowed in the cost assessment process. The respondent stated that it may not be appropriate for the later user (when assuming responsibility) to have to work within the cost allowances set for the initial user.
- 2.18. Out of the seventeen respondents, only three disagreed that the later user should assume responsibility for the construction of the coordinated solution should the initial user become delayed.
- 2.19. Feedback from respondents who disagreed mainly discussed how interchangeability between the initial user and the later user is extremely challenging because it will inevitably lead to delays in the whole transmission system. One respondent referred to the difficult interfaces which come with handing over permitting, land rights, contracting, procurement and engineering expertise. The respondent argued that the later user would need to consider and unpack a significant number of these factors to ensure that the project and those leading it are compliant. Committing to taking over responsibility for the construction of co-ordinated assets, given level of risk, is unlikely to be approved by an investment board, therefore the respondent concluded that that this would not be a feasible option for any later user.

Ofgem Response

- 2.20. We acknowledge that the later user should have flexibility in changing infrastructure expected to be delivered if it takes over responsibility for delivery. Although if a proposal materially changes, whether it be in size, location or costs associated with the proposed infrastructure, then applicants will need to re-submit the parts of their application which are affected by the change. Further information on what constitutes material change can be found in Chapter 3.
- 2.21. In response to feedback on the initial user and later user failing to reach agreement and requests from respondents for some form of dispute resolution, we consider that commercial agreements should be in place between the initial user and later user to manage such risks, and that the parties should be able to establish and agree on the responsibilities of each user between themselves, prior to signing the required joint letter.
- 2.22. Similarly, although we understand the concerns regarding the feasibility of transferring ownership, the onus is on the parties to work together responsibly and only share what is necessary without compromising their own positions. We maintain the same position that in the event of a delay, it is the responsibility of the applicant to determine whether a transfer of responsibilities is appropriate in the circumstances. The ESA allows for later user(s) to assume responsibility for the delivery of shared assets should that be required. The responsibility of when this happens is subject to discussion between the initial user and the later user(s) and should be covered in the joint letter which is submitted as part of the ESA; we will not mandate how and when the later user assumes responsibility for delivery.
- 2.23. Equally, while we understand the importance of clarity on the roles and responsibilities of each user, as each project will be unique, the initial user and later user(s) should work together to determine the roles and responsibilities of each user on a project-specific basis, and capture these in the required joint letter. All later users who are expected to use the coordinated asset and contribute towards the Anticipatory Investment should be included in the joint letter.
- 2.24. In response to the feedback received on the challenges associated with the later user assuming responsibility for delivering the shared assets, we believe applicants are equipped to manage these challenges. We have also included further detail on material change in our Final Guidance Document so that if the later user considers

that the project is undeliverable as set out in the original application and requires changes to be made, they have the right to review the proposal and resubmit the application.

Question 2: Do you have any views on the Draft Early-Stage Assessment Guidance Document?

- 2.25. We received seventeen responses to this question. Eleven respondents generally found the guidance to be a useful basis for submitting an ESA application. However, the majority of respondents also suggested that the Draft ESA Guidance Document did not include a sufficient level of detail to allow prospective applicants to fully understand how the ESA process would apply to coordinated designs. A number of concerns were raised, one being the lack of guidance to address the multiple user concept.
- 2.26. Three respondents stated that the Draft ESA Guidance Document does not account for the possibility for multiple later user(s) not all of whom are generators. The respondents requested that information be provided on how Anticipatory Investment will interact with the multiple user concept.
- 2.27. Three respondents also expressed their concerns regarding commercial sensitivity, noting that given the amount of information being requested from applicants, Ofgem needs to ensure that the process protects the information being shared. One respondent believed that they should be given the opportunity to propose the redaction of any commercially confidential information before any decision is published.
- 2.28. Similarly, another respondent also expressed how the initial user responsible for developing and building the shared infrastructure may be reluctant to share, or prevented from sharing, information deemed confidential and commercially sensitive with the later user(s). Given future Contracts for Difference (**CfD**) auctions or the bid to secure contracts with stretched supply chain providers, many respondents believe that sharing commercially sensitive information will impact competition and compromise the level playing field.
- 2.29. Concerns were also raised by respondents regarding the proposed cost allowance threshold. Several respondents stated that the cost allowance threshold should be kept under review to reflect the interface of risks and costs associated with constructing non-radial transmission assets. Many respondents highlighted the

inadequacy of the traditional benchmarking process due to a number of factors, most critically supply chain pressures and global inflation rates. One respondent also expressed that where projects are coordinating and using High-Voltage Direct Current (**HVDC**) technology there is likely to be limited data available in the United Kingdom due to a lack of historic projects, making the benchmarking data not statistically robust.

- 2.30. One respondent urged Ofgem to consider uncertainty in the market with the need to deliver timely, commercially viable projects which are aligned with the interests of consumers.
- 2.31. Further clarity was also requested on how Transmission Network Use of System (**TNUoS**) charges will work for the later user, how TNUoS charges will be shared between the initial user and later user(s), as well as how TNUoS for the recovery of the sums due from the later user in respect of the Anticipatory Investment will be spread over the Tender Revenue Stream (**TRS**).
- 2.32. General feedback was also received on the 'Eligibility Assessment'. The majority of respondents agreed with the requirements of the 'Eligibility Assessment.' However, two respondents expressed that the conditions for applying should be *either* an AfL or connection agreement, not both, as some projects may have an AfL but not a connection agreement. They believe that this is likely to be the case for a significant number of projects given the wider industry delay in issuing connection agreements.
- 2.33. Another respondent noted that the Draft ESA Guidance Document does not specify whether it is only the initial user that will be required to submit an 'Eligibility Assessment' for its own project or whether both the initial user and later user will be expected to submit an 'Eligibility Assessment'.
- 2.34. One respondent also requested Ofgem clarifies whether an applicant whose project fails to meet the 'Eligibility Assessment' criteria will be able to appeal the assessment's outcome. The respondent suggested that some form of dispute resolution would be appreciated so that an application which would otherwise not meet the set criteria can be reconsidered. Given the range of projects which applicants may decide to apply for, the respondent stressed that this is an important consideration for Ofgem.

- 2.35. Many respondents also suggested that Ofgem could set out the specific requirements and information required to be submitted as part of the application for projects from different OTNR workstreams more clearly.
- 2.36. The ESO's Impact Assessment and its potential intersection with the ESA process was also a core discussion point for many respondents. The ESO's Impact Assessment intends to capture and assess potential deviations from HND/HNDFUE recommendations that developers and/or TOs may identify. Many respondents stressed that Ofgem should consider the ESO's Impact Assessment when undertaking any further cost-benefit analysis appraisal.
- 2.37. Like the 'Eligibility Assessment', the 'Technical Assessment' was received positively by most respondents. However, four respondents found the 'Technical Assessment' lacking some crucial details. For example, one respondent noted how the 'Technical Assessment' includes the requirement for applicants to submit a description of the assets and a detailed cost breakdown but does not define the criteria which will be used to classify spend in respect of the different parts of the proposed infrastructure as either Anticipatory Investment or non-Anticipatory Investment.
- 2.38. The same respondent highlighted that a failure to address this issue could lead to applicants submitting proposals that they consider justifiable but might subsequently be assessed as not cost-efficient by Ofgem. This could ultimately cause delays to the development, consenting, and construction of projects that are critical to meeting government targets.
- 2.39. Feedback was also provided on our proposals for the 'review period'. The majority of respondents welcomed our proposal for a shorter review period. Specifically, most respondents agreed that the timing of the assessment should be at the developer's discretion and agreed that this should be led by the initial user with the formal sign-off from the later user. They also welcomed the commitment to twenty-eight calendar days for reviewing the 'Eligibility Assessment' and a four-month window for the 'Technical Assessment'.
- 2.40. Five respondents also requested clarity on whether the result of ESA will be made public.

Ofgem Response

- 2.41. The Final Guidance Document applies the Anticipatory Investment policy to all projects seeking Anticipatory Investment approval. Where relevant, we have provided further detail for specific projects in our Final Guidance Document, most notably HND and HNDFUE projects.
- 2.42. We acknowledge that the multiple user concept was not covered in the Draft ESA Guidance Document and because of feedback requesting further clarity on the concept, we have now accounted for it in our Final ESA Guidance Document, and also discusses multiple users further in Chapter 4 of this document.
- 2.43. In response to concerns regarding commercial sensitivity, as mentioned in our May 2023 Consultation, we will discuss matters relating to the proposed Anticipatory Investment with other interested parties, including The Crown Estate and Crown Estate Scotland, the ESO and the Department for Energy Security and Net Zero.
- 2.44. To ensure that the information shared by applicants is protected, we will engage in any such discussions only to the extent necessary to fully assess the application. It is also important to note that none of the commercially sensitive information submitted to us as part of the ESA process will be available to the public.
- 2.45. Similarly, on CfDs, we do not consider that the Anticipatory Investment policy will breach the competitive nature of the CfD regime, but we strongly recommend that applicants take their own legal advice on this.
- 2.46. In response to feedback received on the cost allowance threshold and more notably, the need to balance consumers interests and the timely delivery of commercially viable projects, we agree that some assurance and flexibility should be provided to applicants and we have increased the cost allowance threshold to 10%. More information on this can be found in Chapter 3.
- 2.47. On TNUoS and the questions raised regarding charging, these are currently being addressed by code modification CMP411: '*Introduction of Anticipatory Investment within the Section 14 Charging Methodologies*', which is currently going through the code modification process. We intend to make a decision on this in Q1 of 2024.

- 2.48. On the 'Eligibility Assessment', and the possibility of amending criteria so that applicants will need either an AfL or a connection agreement, we maintain that both items are required for the initial user and all later user(s). We will take into consideration any specific issues that may arise such as delayed connection agreements when assessing and applying the requirements.
- 2.49. Applicants whose projects fail to meet the eligibility criteria as set out in the ESA Guidance Document will be able to contact us to discuss the assessment's outcome. We reserve the right to apply our discretion in relation to the outcome of any ESA assessment, each application will be assessed on its eligibility and technical assessment, although we will also take into account the context and conditions likely to affect the competitiveness of the energy markets in which the applicant operates. No factor alone will be decisive and further factors may be relevant to our ability to exercise discretion. We would encourage developers to come forward to discuss their Anticipatory Investment proposals with us before submitting an application.
- 2.50. We will also consider the ESO's Impact Assessment as part of the ESA process. It will be considered as supplementary information to support the applicant's proposal if they wish to refer to it.
- 2.51. We consider that the Final ESA Guidance Document includes sufficient detail for applicants to complete a submission to the ESA with all the details we require.
- 2.52. We maintain our position on the 'review period' insofar as we will assess and provide a response for the Eligibility Assessment within twenty-eight calendar days, and after confirming whether a proposal satisfies the conditions of the Eligibility Assessment, we will then progress onto the Technical Assessment.
- 2.53. We will conclude the Technical Assessment within four months of the original submission provided that we have been given all information necessary to make that assessment. If the information provided is considered to be 'incomplete' by us, we will request additional information to complete our assessment.
- 2.54. Where we request further information, we will indicate a date by which that information is to be provided. When additional information is requested, the review period will be paused. This will, therefore, extend the review period by the number of days the applicant takes to provide the additional information.

Decision on the Early-Stage Assessment

- 2.55. The outcome will be issued in a private decision letter. The ESO will also receive the Anticipatory Investment figure. Where we consider the consumer benefit of an application is not clear, we may choose to consult on the decision of the application, but with due consideration to confidentiality and commercial sensitivity.
- 2.56. We will take into account the sensitivity of the information we have been provided and the urgency of making a decision when deciding whether or not to consult and how long for.
- 2.57. It is important to note that regular engagement with applicants will help mitigate the impact of any timing delays. We encourage clear and efficient communication between applicant and the reviewer to facilitate the process.

3. Decision on Output, Cost Allowances and Material Change

Section Summary

In this section, we outline the key feedback received from stakeholders and provide our final policy positions on the cost review aspect of the ESA. We also provide our final policy positions on material change provisions.

Decision Summary

- 3.1. Given the responses to the consultation and the analysis undertaken, we are upholding our views on material change and how it will be implemented in the ESA process. Whilst we consider it impractical to compile a complete list of events which we would consider to be material changes, we encourage developers to come forward and discuss their circumstances with us wherever possible so we can advise applicants on whether they should apply for re-assessment.
- 3.2. We acknowledge the need for any re-assessment to be efficient and to minimise any delay to developers as far as possible. As a result, we will only re-assess the areas of the application which have changed materially rather than the application as a whole.
- 3.3. Following stakeholder feedback to our proposals for the 'cost review' section of the ESA, we consider it appropriate to increase the ring-fenced amount for developer overspend from 5% to 10%. We have increased the threshold to 10% in response to concerns from respondents regarding uncertainty and risk leading to unforeseen price fluctuations.
- 3.4. We also consider it appropriate to give applicants the opportunity to submit detailed costs at a later date when the project(s) are at a more advanced stage of development. A preliminary view on costs would still be required as part of the primary submission.

Stakeholder Feedback and Ofgem Response

Question 3: Do you have any views on what should constitute material change for projects?

- 3.5. In total, we received fourteen responses to this question. Three respondents agreed or strongly agreed with our proposal for including material change provisions as part of the ESA. All three acknowledged the difficulties in providing a fixed scope for examples of material change. The same respondents also agreed that the threshold for materiality should be considered on a project-by-project basis. Some respondents also stated that projects will be first of their kind and so what constitutes material change should have a wide scope.
- 3.6. The remaining eleven respondents neither agreed nor disagreed with our proposal for material change provisions. Of these 11, eight of the respondents stated that there was insufficient detail in the guidance regarding what would constitute material change. Many respondents included their own examples of what should constitute material change. The most common examples referenced included:
- Project's timelines
 - Cost projections
 - Scope of the project
- 3.7. In general, respondents also stated that if the responsibilities of the initial user were to transfer to the initial user, this should also constitute material change. One respondent disagreed with this and said that the shift in responsibility for construction should not constitute material change. One developer suggested the process of re-applying should not be too onerous.

Ofgem Response

- 3.8. In the event that the responsibilities of the initial user and later user have to switch over, we would consider this a material change. However, if this has no adverse impact on the needs case or cost benefit analysis, the later user, who will now be the applicant, will benefit from a streamlined re-assessment. In this instance, the

re-assessment would consist of Ofgem ensuring costs have not changed and assessing any variations required.

- 3.9. Given the level of coordination expected to be delivered and the novelty of Anticipatory Investment policy, we believe it is impractical to provide an exhaustive list of events which would constitute a material change. Having said this, in our Final ESA Guidance Document we have included more information on what we will consider as material and have provided some examples.

Question 4: Do you agree with Ofgem’s proposed approach to projects which experience material change?

- 3.10. We received sixteen responses to this question. Eleven respondents agreed with our proposed approach to projects which experience material change. One stakeholder agreed with our streamlined approach to projects which had experienced material change with no adverse impact on the overall needs case.
- 3.11. Five respondents neither agreed nor disagreed with our approach. These respondents, along with some of those who agreed with our approach, did however query when applicants should inform Ofgem of any material change. One developer stated that our use of the word ‘timely’ was too ambiguous while another stated that an ‘iterative’ ESA process could cause delays.
- 3.12. One respondent suggested that a third party should be consulted if there is a disagreement between Ofgem and the developer regarding whether a change should be considered material.
- 3.13. Several respondents also queried what a re-assessment would look like. One respondent suggested that resubmission information should be kept as light as possible and encouraged Ofgem to reuse elements of the original submission where appropriate.

Ofgem Response

- 3.14. It is in an applicant’s best interests to inform us once they become aware of any material changes to their original application. The ESA will typically be used by projects at an early stage, however once the project has progressed further in its development, applicants will be best placed to understand whether any changes are likely to happen and are significant enough for them to come forward and

inform us. As stated in the consultation, if the material change is not notified to us, any additional cost above the 10% threshold may be disallowed as Anticipatory Investment.

- 3.15. To reduce the possibility of delay, applicants should engage with us on potential material changes that may arise as this will help reduce the time taken for Ofgem to analyse any material changes in the revised application.
- 3.16. We disagree with the proposal made in paragraph 3.12 to have a third party to decide whether a change is material or not. We consider that we are best placed to make this decision given our role, remit and expertise.
- 3.17. We appreciate that a re-assessment could potentially lead to delay. We will limit our reassessment to the areas of the original submission which have been impacted by the material change. For example, if the cost of the coordinated solution has increased significantly, we will review the cost increases and the impact on consumer benefit.

Question 5: Do you agree with Ofgem’s proposed approach to cost disallowances in Anticipatory Investment?

- 3.18. We received sixteen responses to this question. Four respondents agreed with our proposed approach to cost disallowances in Anticipatory Investment, and twelve respondents disagreed with our proposals.
- 3.19. Ten respondents disagreed with the proposed 5% overspend threshold, many of whom considered that the nature of the ESA means that costs would still be at a premature stage in the development of the project.
- 3.20. One respondent stated that costs which are outside the control of the developer or inflationary should not contribute towards the 5% threshold. Another respondent argued that a 5% threshold would be an “insurmountable barrier” to coordination. Another respondent stated they believe the overspend and underspend thresholds should be reduced to 2% and 5% respectively. Five respondents also questioned the reasoning behind a 10% underspend threshold.
- 3.21. Three respondents proposed a staged ESA where applicants could submit their costs at a later date. Some of these respondents also suggested a ‘threshold funnel’, where costs would have a larger threshold at the initial cost review stage

and would then reduce as the project advances. One stakeholder considered that the projects in question will carry a lot of uncertainty and risk, and having a staged ESA would help address the resulting cost fluctuations.

- 3.22. Two stakeholders enquired about how we will account for inflation, uncertainty and risk leading to price fluctuations at an early stage. Another two stakeholders pointed out that due to this uncertainty, traditional price benchmarking is not appropriate, as there are no similar projects to compare costs to, especially for those using HVDC technology. One stakeholder asked Ofgem to consider the different set of risks and costs for non-radial vs radial transmission systems, and to reflect them in our cost disallowance protocol.
- 3.23. Three stakeholders proposed an ex-ante approval of AI costs rather than the proposed ex-post. One respondent used the Cap & Floor regime and Large Onshore Transmission Investments as examples of Ofgem using an ex-ante method to assess costs. Respondents mentioned that using an ex-ante method would allow applicants to amend their scope and eliminate inefficient costs at an earlier stage and provide them with increased certainty in cost recovery.

Ofgem Response

- 3.24. We agree that costs submitted for the ESA, depending on the time at which the submission is made, may be at a high level and could carry a high probability of fluctuation. We accept that increasing the threshold would further promote developers coordinating assets. For this reason, we have increased the overspend threshold to 10%. The increased threshold should account for the increased uncertainty for applicants applying at an early stage in their development.
- 3.25. We expect developers to take actions to mitigate inflationary cost increases in advance of their submission to Ofgem. Provided any such provisions are identified up front as part of the developer's cost submission, we would consider whether these are economic and efficient and allow for any associated increase to be included as Anticipatory Investment.
- 3.26. We will also maintain the 10% underspend threshold. The underspend threshold mechanism has been included to ensure applicants do not provide over inflated estimates, which represent a lack of value for consumers. Should developers overinflate the figures to such an extent where in their final cost submissions the

Anticipatory Investment portion is more than 10% less than what was initially submitted at the ESA, then all costs for the Anticipatory Investment will be subject to the normal cost assessment process.¹⁴

- 3.27. We agree with those respondents who proposed that a phased approach to the ESA would allow developers to submit costs at a stage where they may be less likely to be disallowed. We will allow applicants to undertake the cost review at a later stage, should they wish to. Developers will be able to submit their application to the ESA for an agreement in principle and then provide a detailed cost breakdown for the cost review at a later stage. Should developers decide to submit a detailed cost breakdown at a later stage, a preliminary view on costs would still be required as part of the primary submission. Alternatively, should developers wish to submit their application at the same time as the cost breakdown, they will be able to. This aims to ensure flexibility in approach, acknowledging that projects will be unique and may be at different levels of maturity at the point of application.
- 3.28. Applicants who choose to complete the cost review at a later date will still be able to have their eligibility, scope, technical parameters and other aspects of their ESA application reviewed by Ofgem in order to have their proposed coordinated solution agreed (in principle) at an earlier stage.
- 3.29. In paragraph 3.22, we highlighted a few requests from respondents regarding the different risks that may be associated with non-radial projects. We do not consider that we need to address different sets of risks and costs for non-radial transmission systems as separate parameters in the ESA. This is because in all cost assessments, we deal with all aspects of a project, on an individual basis and, by default, part of that would be taking into account different factors, such as risks and costs, amongst others.
- 3.30. In response to the suggestion of a 'threshold funnel' (paragraph 3.21) given the increased threshold and ability to submit costs at a later date, we do not consider this to be necessary and have therefore not included it as part of the ESA process.

¹⁴ [Offshore Transmission: Guidance for Cost Assessment \(2022\)](#)

3.31. Finally, the cost review, as part of the ESA, is an ex-ante process. Any cost submitted to Ofgem, as part of the ESA, that meets the requirements set out in the guidance will be ringfenced with a 10% allowance for increases. If the costs associated with a proposed coordinated solution increase above the 10% allowance (and where the cost allowance has not been increased as a result of an approved material change request), the cost will then undergo an ex-post review as per our usual cost assessment protocol used to determine the Final Transfer Value.

4. Variations to Anticipatory Investment Policy

Section Summary

In this section, we consider some variations to our Anticipatory Investment policy, which has come up through the consultation responses. We consider the possibility of multiple later users and the same developer having split connection offers as a result of the HND, HNDFUE and CSNP.

- 4.1. We understand that Offshore Coordination is a novel area for all stakeholders. As such, there are circumstances which we may not have considered when developing and consulting on our Anticipatory Investment policy. We have maintained a flexible approach towards Anticipatory Investment to promote coordination between developers and unlock the consumer benefit that follows.
- 4.2. During the consultation period for the ESA, and through bilateral engagement, stakeholders raised a number of scenarios which may require a modification to the original policy. These have arisen from changes in their circumstances, outside of their control which relate to developments in the HND or HNDFUE. We have engaged with developers and consider that adjustments to our Anticipatory Investment policy should be made to enable coordination.
- 4.3. Where developers consider that they have a coordinated solution which can benefit from Anticipatory Investment policy and which meets the principles set out in our Decision on Anticipatory Investment and Implementation of Policy Changes¹⁵, they should discuss this with Ofgem. We reserve the right to allow projects to benefit from Anticipatory Investment policy provided their coordinated solution meets the requirements set out in the ESA and meets the principle of the policy.

Coordinated Solutions with Multiple Later Users

- 4.4. In our previous publications, we have considered a single user being responsible for developing a coordinated solution, which would benefit another single project when they connect at a later stage. However, with the developments in the

¹⁵ [Decision on Anticipatory Investment and Implementation of Policy Changes | Ofgem](#)

HNDFUE and CSNP, it is now possible that multiple projects may connect to a shared asset built by a single, initial user.

- 4.5. We will allow any developer responsible for realising the coordinated solution to benefit from Anticipatory Investment policy provided they meet the conditions set out in the ESA. It will be the initial user's responsibility to provide a joint letter with all associated later user(s).
- 4.6. We will work closely with ESO to reflect this variation in the ongoing code modifications if necessary. The ESO will be responsible for allocating proportional User Commitment profiles to the relevant later user(s).

Split Capacity Projects

- 4.7. In our previous consultations, we developed the Anticipatory Investment policy on the basis that two different developers, who are competing, have several barriers to coordination, despite it being in their own interests and the interests of consumers. One example of this is that the initial user has no guarantee that the later user will connect. If the later user does not connect, the initial user will have incurred costs in constructing an oversized asset which cannot be recovered. The Anticipatory Investment policy would not typically apply to a single developer who opted to split their capacity and construct an oversized asset to accommodate an increase in capacity happening at a later date.
- 4.8. However, the development of the HND and HNDFUE has meant that some projects have been given two different connection offers. This means that part of the project may be delivered earlier while the remaining capacity would be delivered at a later date.
- 4.9. Typically, an asset being built out by a single developer for their own use at a later stage would not fall under the scope of the Anticipatory Investment policy. Some developers came forward following developments in the HND and HNDFUE sharing the difficulties that two different connection offers present. Anticipatory Investment policy has been implemented to give effect to offshore coordination, and a key part of that coordination has been driven by the HND and HNDFUE. In addressing this issue, we considered the importance of ensuring that our policy supports the delivery of projects within the scope of the HND and HNDFUE. We therefore agree that projects which have been given two separate connection

agreements (therefore “splitting” the project) should be able to seek to benefit from Anticipatory Investment.

- 4.10. Consumers stand to benefit from a single asset being built rather than two separate radial connections from the same project. Consumers benefit from reduced costs as a result of the coordination in the HND. If projects are forced to build multiple radial connections due to split connection agreements, the consumer benefit resulting from the HND will be reduced.
- 4.11. To ensure consumer benefit and promote coordination, we will allow projects, which have been given two different connection offers as a result of the HND and HND FUE to benefit from Anticipatory Investment policy. The developer must still meet the criteria set out in the ESA and demonstrate that the split connection offers were outside of their control.

5. Next Steps

Section Summary

In this section, we outline the next steps, including when projects should submit their applications for the ESA.

- 5.1. This document has outlined our final policy decisions in relation to how we will assess projects applying through the ESA and what the outcome will look like. We have considered all stakeholder responses to our May 2023 Consultation, as well as responses to our 2022 consultation on Anticipatory Investment policy before arriving at our final position. Applicants should refer to our Final ESA Guidance Document, which reflects the final policy positions discussed in this decision, before making an application through the ESA process.
- 5.2. We are currently working closely with the ESO on charging related matters. Questions related to Anticipatory Investment are currently being addressed by code modification CMP411: '*Introduction of Anticipatory Investment within the Section 14 Charging Methodologies*', which is currently going through the code modification process. We intend to make a decision on this in Q1 of 2024.
- 5.3. We invite developers who are looking to send an application as soon as the code modification process is complete, to engage with us informally on the contents of their submission. This will help reduce the risk of delay and allow applicants to provide an adequate application.

Ancillary Documents and Guidance

- 5.4. In our May 2023 Consultation, we set out our intention to review ancillary documents and cost assessment guidance that may require modification in order to give effect to our changes in how Anticipatory Investment is treated. This remains our intention and will be completed in due course.

6. Appendix

Index

Appendix	Name of appendix	Page no.
1	Glossary	37-39

Appendix 1 – Glossary

A

AfL

Agreement for Lease

Applicant

By “applicant” or “applicant(s),” we refer to the person(s) making a formal application for the Early-Stage Assessment. The terms “applicant,” and “developer” are used interchangeably in this document.

Anticipatory Investment

Investment that goes beyond the needs of immediate generation project, reflecting the needs created by a likely future generation project or projects.

Authority

The Gas and Electricity Markets Authority established by Section 1(1) of the Utilities Act 2000. The Authority governs Ofgem. “Ofgem,” “the Authority” and “we” are used interchangeably in this document.

C

CSNP

Central Strategic Network Plan

CfD

Contracts for Difference

D

DESNZ

Department for Energy Security and Net Zero

Developer

In respect of a generator build offshore transmission project Section 6D(2)(a) of the Electricity Act 1989 defines such a person as ‘the person who made the connection request

for the purposes of which the tender exercise has been, is being or is to be, held'. In practice, such person is also the entity responsible for the construction of the generation assets and, under generator-build, the transmission assets. Under generator-build, this is the person who requests that Ofgem commences the tender process in respect of a proposed project. The developer in this case will be responsible for the construction of the generation assets as well as the transmission assets. The developer will make submit the ESA application and the terms "developer" and "applicant" are used interchangeably in this document.

E

ESA

Early-Stage Assessment

ESO

Electricity System Operator

H

HND

Holistic Network Design

HNDFUE

Holistic Network Design Follow-Up Exercise

HVDC

High-Voltage Direct Current

I

Initial User

We refer to the developer making the investment in the shared asset as the initial user.

L

Later User

We refer to the developer or developers that will use the shared asset in the future as the later user.

O

Ofgem

Office of Gas and Electricity Markets. Ofgem, “the Authority” and “we” are used interchangeably in this document.

OFTO

Offshore Transmission Owner

OTNR

Offshore Transmission Network Review

P

PT2030

Pathway to 2030

T

TNUoS

Transmission Network Use of System

TRS

Tender Revenue Stream