

Ofgem

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**Tamasin Fraser**

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2023-09-01

Dear Sirs

**Centralised Strategic Network Plan: Consultation on framework for identifying and assessing transmission investment options**

ABO Wind UK Limited (ABO) is part of the ABO Wind group of companies, a globally successful project developer of renewable energies with over 1000 employees. Since 1996, the company has developed wind energy, solar and biogas plants with an output of c.4GW. We are currently working on the development of new projects with a total capacity of 21GW across sixteen countries on four continents. Our core business is the development and construction of onshore wind, solar and battery energy storage projects.

Ongoing engagement with stakeholders at all levels is a priority for ABO in support of our ambition, and we welcome the opportunity to respond to this important consultation. A detailed response to the questions set out in the consultation has been prepared and is enclosed at Appendix 1.

I trust the responses set out in our response will be given due consideration as the final policy is developed. We look forward to ongoing engagement with Ofgem.

Yours sincerely,



Tamasin Fraser  
Director

ABO Wind UK Limited

**Enc. Appendix 1**

## Appendix 1 – Detailed Response to Questions

Q 1. Do you agree with our broad regulatory approach to establishing the FSO's obligations to deliver the CSNP products?

- Broadly agree with the proposed regulatory approach
- However, there must be a clear interim approach that does not lead to delays while the enduring approach is finalised

Q 2. What are your views on the types of system need that we have proposed are covered by the CSNP? Are there any gaps?

- We welcome the intention to extend the types of system need beyond the current approach focusing on boundary constraints.
- We agree that there is a need for analysis to include longer-term system need, including an ability to respond to low regularity, high impact system events such as 'dunkelflaute' weather systems.
- We believe that more information should be given regarding what the input to the CSNP from 'day to day balancing operations' system need would be.
- Strategic connection exercises – these should not negatively effect other viable generation coming forward in the areas where the exercises are carried out. To some extent the PMO3 and PMO4 of connections reform will cover the connection exercises.

Q 3. Do you agree that the time horizon for system need assessment should be extended to 2050?

- We agree that the time horizon for the system need assessment should be extended.
- We propose that this should be on a rolling period (such as 25 years) with no fixed final date.

Q 4. Do you agree that the FSO should move to a year-round nodal assessment of system need as part of the CSNP?

- We agree that the FSO should move to a year-round nodal assessment.
- We support the potential for the availability of more granular information about network capacity at specific nodes, which will help inform network users and developers. In the long term this could also help reduce the transmission connections queue, by allowing developers to make better informed decisions on where to site their projects. This must however be done in conjunction with additional entry barriers to connections to avoid the capacity being allocated to unviable and speculative schemes, which could delay connection dates and increase reinforcement works.
- We also welcome the move to a year-round assessment as there is a need to address system stability events in low and high demand scenarios.

Q 5. We welcome stakeholders' views on how the FSO can communicate effectively about future system needs?

- We agree that there is a key requirement on the FSO to communicate effectively with stakeholders about both the inputs and outputs of the CSNP.
- Given the scale of the challenge and the required amount of new network that will be built, clear explanations of what is needed, when and why, that can be understood by a non-expert public is going to be essential, alongside any community benefits.

Q 6. What are your views on the FSO establishing minimum design requirements for high-level option designs and are there areas where exceptions are needed?

- Standardisation should be implemented across all sites where possible
- Sites should be developed with sympathy to further future expansion with high level design of how the site could be expanded.
- We believe that this is a vital step in reforming network planning.
- The need for having clear design standards has been highlighted in Nick Winser's report.
- Design standards will also need to be endorsed within the planning regime and should be explicitly referred to within the National Policy Statements (NPS) and Scottish National Planning Framework (NPF).
- These standards should also be clearly agreed with and endorsed by Ofgem.

Q 7. Do you have any views on our proposals for considering environmental and community impacts as part of high-level design of options?

- Requires weight within the planning regime and is recognised within the NPS/NPF documents.

Q 8. Do you have any views on our proposal for the FSO to independently decide which network needs it may lead the high-level design of?

- Which needs the FSO decides needs to be clear and documented going into the design.
- Any high level design will need a feedback loop between the FSO and TO's to ensure a well engineered design, meeting all parties needs
- High level designs should focus on existing accepted contracts due to these going in excess of 15 years of a 25 year rolling plan, or 11 years from 2050 plan, as per latest TEC register)
- High level designs should not negatively impact viable accepted schemes of today and the market should continue driving renewable and low carbon growth
- Cautions must be issued with the interaction to connections reform, TMO3 and TMO4 in connections reform does take away some of the high level design from the FSO, assuming the FSO does not want to be doing batch assessments with new and existing network.

Q 9. Do you have any views on our proposal for the FSO to set out how and when third parties can be involved within the CSNP?

- We support this proposal

Q 10. Do you have any views on our proposals on data exchange to enable the implementation of CSNP?

- We welcome the proposals on data exchange.
- Highlight data should be displayed in a uniform manner between all operators utilising standard templates.

Q 11. Do you have any views on our proposals regarding the principles to be followed in the CSNP decision-making framework?

- Welcome the proposals and agree that there have been issues with the transparency and execution of the NOA process.
- As such we are happy that the FSO will have to demonstrate how they will meet the principles of transparency, stake holder engagement, adaptive to change and robust and consistent.
- However, while we agree with the principles above, this must translate into concrete action and measurable deliverables.

Q 12. Do you have any views on our proposals on the decision-making framework for selecting potential projects to address longer-term system needs?

- We support the proposals mentioned
- In particular we support least worst options and proposals that support future substation growth,
- Long term systems needs must be looked at in line with todays needs, given we already have connection queues into 2039 and long term proposals should not hamper short term investment or the existing connection queues.

Q 13. Do you have any views on the decision-making framework to bring potential projects into the 'delivery pipeline' for nearer-term needs?

- The justification needs to be transparent and clear parameters set
- A timeline for firm decisions needs to be implemented, or trigger points identified in advance
- This will need to link to align with NPF and timescales for planning approval
- Any decisions should not delay customer funded works

Q 14. We would welcome views on our proposal to not re-evaluate projects that are in the delivery pipeline, and whether a materiality trigger is appropriate and what criteria might be used.

- Support the proposal
- Resources are scarce across the industry and the stop start nature of some projects does not drive forward a sustainable network development nor an efficient cost.
- Underlying assumption changes have meant a number of approved projects have been put on hold. Ultimately some have then proceeded.
- This will avoid unnecessary delays to development, with very few high-regret cases to date

Q 15. Do you have any views on our proposal on inclusion of environmental and community impacts in the CSNP CBA?

- We agree that environmental and community impacts are considered. However, these should facilitate new infrastructure work and not be a barrier.
- We agree that costs should include wider societal cost of not meeting Net Zero.
- This should set out clearly how stakeholders can influence the decision making process.

Q 16. Do you have any views on our proposal for the CSNP to include a methodology for assessing and taking forward system operability solutions?

- We agree.

Q 17. Do you agree with our proposal for the ESO to review its current approach to assessing short and long term solutions, and for the FSO to set out its approach in the CSNP Methodology?

- We welcome this proposal.

Q 18. Do you have views on our proposals for FSO to develop capabilities to consider different combinations of options and how this should be implemented?

- We broadly agree with the proposals but these need to not be made at the detriment to viable alternative generation schemes.
- We support the FSO not having the power to make decisions on location, capacity, technology type, size etc given the industry has already proven to be reliable in delivering schemes to the market, as shown by current reinforcement dates and TEC queue. The FSO should support in the quantity of future power required regionally.

Q 19. Do you agree with our proposal to introduce a requirement, as part of the new CSNP licence condition, for the FSO to make recommendations on additional interconnection and OHAs opportunities between GB and other markets?

- We support the proposal for a continued interconnector plan to support network growth and agree this would be best place to continue within CSNP to ensure a unity approach across interconnectors and alternative generators.

Q 20. Do you agree with our proposal that the FSO should use reasonable endeavours to support relevant stakeholders as part of the offshore asset development process?

- No comment

Q 21. Do you agree with our proposal that the FSO assess third-party options under the CSNP and recommend delivery by competition where proposed solutions meet the relevant competition criteria?

- We agree with the proposal, but the indication that competition will be used must be as early as possible to ensure that there is suitable supply chain visibility.

Q 22. What are your views on whether changes to the SQSS or obligations on licensees are needed to support the CSNP – where specifically are these changes needed and when do they need to happen by?

- We do believe changes could be made to SQSS, we would welcome a further industry review to identify potential options.

Q 23. Do you agree that the FSO should evaluate the climate resilience of the long-term whole-system CSNP?

- We support this approach.

Q 24. Do you agree with the proposed position on the treatment of connections in the CSNP?

- The FSO should be able to identify 'connections hubs', where large amounts of grid connections are known or are located and these should not be related to specific technologies, projects etc.

- As part of their regulation of the CSNP process, Ofgem must accept the principles of investing ahead of need. Even if investment leads to short term under-utilisation, the long term system benefits of 'plug and play' connections must be accepted with capacity issue carefully coordinated to avoid hoarding.
- Changes should work in conjunction with the Connections Reform work currently ongoing and the process identified and changes made under connections reform should remain largely static without further major changes.