

James Dunshea  
Ofgem  
Commonwealth House  
32 Albion Street  
Glasgow  
G1 1LH

By email:

RIIOElectricityTransmission@ofgem.gov.uk

Date

24<sup>th</sup> November 2023

Contact / Extension

Lauren Logan

07385 346208

Dear James,

#### Consultation on Yorkshire GREEN project Early Construction Funding

This consultation response is from SP Transmission (SPT), which holds the transmission licence for the south and central Scotland. SPT is part of SP Energy Networks (SPEN) and the wider Iberdrola group. We welcome the opportunity to respond to the consultation on Yorkshire GREEN project Early Construction Funding (ECF).

We are supportive of Ofgem's minded to position to grant the requested ECF request given it aligns with the activities of the ECF as set out within Special Licence condition 3.41 Accelerated Strategic Transmission Investment Re-opener and Price Control Deliverable term, Part C: ASTIA<sub>t</sub>.

We welcome Ofgem's support in accelerating Transmission infrastructure investment in light of Net Zero targets including access to ECF for TOs. Our understanding from recent RIIO-T3 workshops is access to ECF funding will become more 'automatic' under the major projects regime, negating the need for Ofgem approval and consultation. Given the acceleration required for Transmission infrastructure now and the benefit of reducing the regulatory burden of processing and consulting on applications we would encourage Ofgem to consider this for the remaining ASTI schemes ahead of the RIIO-T3 period.

Please do not hesitate to contact me should you wish to discuss any of the points raised within this response.

Yours sincerely,



Lauren Logan

Head of Transmission Regulation & Policy