

Hartlepool Borough Council
Civic Centre
Hartlepool
TS24 8AY

Tel: 01429 266522
www.hartlepool.gov.uk

Our Ref:
Your Ref:



Contact Officer/Email:

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The Office of Gas and Electricity Markets
10 South Colonnade
Canary Wharf
London E14 4PU
connections@ofgem.gov.uk

Dear Sirs

Response to Open Letter on Future Reform to the Electricity Connections Process

I am writing on behalf of seven Councils in the North East region (Darlington, Durham, Hartlepool, Middlesbrough, Newcastle, Redcar & Cleveland, Stockton). For the past few years, these Councils have been working together to find a sustainable long-term solution for municipal waste disposal by seeking to develop a major new Energy From Waste facility ("EFW") located at a site in the Tees Valley.

I previously copied to Jonathan Brearley a letter dated 11th March 2022 which I sent to the Chief Executive of Northern Power Grid (NPG) from whom we have a conditional grid connection offer. This is required to enable the development of our project. This letter made representations regarding substantial delays to the timescales for this grid connection due to transmission reinforcement works being implemented by National Grid. For completeness this letter is attached as Appendix 1 to this response ("*Appendix 1 - Phil Jones - NPG - NGESO 220311.pdf*").

I also wrote to National Grid ESO (NGESO) about the issue and the urgency of the situation. For completeness this letter is attached as Appendix 2 to this response ("*Appendix 2 - NGESO Susana Neves E Brooks 220318.pdf*").

We are therefore very pleased to see that both Ofgem and NGESO are now recognising the need for reform of the electricity connections process to enable prioritisation of connections.

Priority of Connections

As part of this review, we would encourage any prioritisation process to take account of the following positive attributes of our project:

- a) our project is not being developed for commercial gain – rather it is required to discharge a statutory duty of the Councils to dispose of waste generated by c.1.5 million residents in the North East;
 - b) at the same time, we are exporting c.42MW of substantially renewable electricity;
 - c) we are planning to implement carbon capture, utilising CO₂ transport and storage infrastructure being developed by the East Coast Cluster adjacent to our EFW.
- Combined with the renewable electricity generation referred to above, this will result

in carbon emissions from our EFW being negative, thus making a significant contribution to the net zero agenda;

- d) our electricity generation contributes to a steady base load (with planned outages scheduled at times when demand is lower). This obviates the need for duplication of national grid capacity which would be required associated with more intermittent power sources; and
- e) we are ready to move forward, subject to confirmation of the grid connection arrangements and time scales.

We would be very surprised and disappointed if Ofgem and NGESO did not agree that such attributes are both strategically important and consistent with national policy objectives and should thus be prioritised.

Timescales

It is already over a year since we first raised our concerns with NPG, NGESO and Ofgem, and in a best case scenario our project has already suffered a c.2 year delay due to the existing constraints of the National Grid and the connections process. We would therefore encourage all parties to progress and resolve the reforms to the electricity connections process as quickly as possible. This could also include early prioritisation of projects such as ours which so clearly align with national policy objectives.

Embedded Generation

We are reliant on a grid connection via NPG as opposed to a direct connection to the national grid. We would hope that Ofgem and NGESO would prioritise projects based on their attributes, irrespective of whether the generation was direct or embedded.

We hope that this is helpful in informing the next stage of your work. I would be happy to speak to you on behalf of the seven Councils if such a discussion would help inform your decision making.

Yours faithfully



Denise McGuckin
Managing Director, Hartlepool Borough Council and Chair of Project Board