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**Green Gen Cymru response to Electricity Transmission Advanced Procurement Mechanism (APM) consultation**

Dear Margaret,

Thank you for the opportunity to reply to this important consultation.

Green Generation Energy Networks Cymru (Green GEN Cymru) is part of the Windward Energy Group which was founded in 2018. The group is looking to invest over £3.6bn to unlock over 3GW of renewable energy in Wales by 2030. The group's plans are a key part of the NESO / UK Government CP2030 delivery plan.

Proudly based in Wales, Green GEN Cymru has been granted an Independent Distribution Network Operator (IDNO) Licence from Ofgem (July 2024) and is developing around 300km of new grid infrastructure to unlock Wales' energy capability and meet the future needs of its' people, communities, and businesses.

**Key Feedback Points on the APM**

1. Green Generation is fully supportive of the UK Government Net Zero pathway and also fully behind the CP2030 mission.

We were therefore really excited to see the Ofgem published headline on November 20<sup>th</sup> .....

***“Fast track funding to give Britain a head start in global race for clean power parts”***

***“Ofgem is consulting on introducing a new investment fund worth between £5 billion and £8 billion that will help Britain’s energy transmission owners cut delays, control costs and beat other nations to attract international investment in the drive to net zero.”***

2. We agree with advantages to this “first-of-its-kind” framework; including reduced risks, supporting growth and accelerated project delivery.
3. Along with the Transmission networks, we are “part of the race”; as outlined by Akshay Kaul to meet the Governments 2030 Clean Power targets. We also agree with the quote from Energy Minister Michael Shanks:

***“The independent National Energy System Operator has said that clean power by 2030 is achievable and can create a cheaper, more secure energy system.***

***“To get there, we need to give developers a head-start to secure the essential equipment needed for new clean energy infrastructure.***

***“By getting ahead of the global race for these materials, developers will be able to avoid costly delays to projects and ensure nothing stands in the way of our clean power mission.”***

4. We are a newly established IDNO and investing (at risk) circa £0.5bn on 300km of new 132kv electricity network infrastructure in Mid Wales by 2030. As we are an IDNO we do not have the luxury of a Regulatory Asset Base nor do we have a Price Controlled Allowed Revenue.
5. As a significant investor in Grid, we are now facing the challenge and risk of significant advance procurement and would therefore like to access this welcome fund.
6. Without access to this fantastic fund, it clear that Green Gen Cymru as an IDNO will be at a significant disadvantage to the RIIO T3 Networks and indeed may lose out on access to vital supply chain that are able to contract with certainty to the RIIO T3 networks.
7. It is our view, that this £5bn to £8bn fund should be open to all those networks who will provide new Grid by 2030 – and not just ring fenced to the RIIO T3 regulated networks.
8. Therefore, our proposal would be that this is not a ring fenced, ex ante allowance for RIIO T3 networks but a wider fund that could be accessed by all networks who are delivering and face the same risks to 2030

We would be delighted to discuss this response with you and we are happy for our response to be published in full.

Yours sincerely



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