

Transmission licensees,
Generators, suppliers, and-
consumer groups

Date: 9 May 2025

Dear Colleague,

**Consultation on minded-to decision for an Insulation and Interruption Gas
Exceptional Event Claim for Scottish and Southern Electricity Networks (SSEN) at
Blackhillock**

Background

Ofgem received a notification from SSEN on 1 November 2024 regarding a leakage event of 6.115kg of sulphur hexafluoride gas (SF₆) at its Blackhillock substation, which occurred on 19 October 2024.

The claim was submitted under Part C of Special Condition 4.3 Insulation and Interruption Gas emissions output delivery incentive (IIG Incentive) and allows for Transmission Operators (TOs) to make a claim that a leakage event meets the definition of an IIG Exceptional Event. Subsequent information regarding the event was provided by SSEN to Ofgem on 29 November 2024.

Details of the claim made by SSEN are provided below:

Details of claim provided by Licensee	
Licensee	SSEN
Date(s) of IIG leakage event	19 October 2024
Event cause & Location	Sulphur hexafluoride (SF ₆) leak at Blackhillock 400kV substation which started on 19 October 2024. The leak occurred on the RB2G3 gas zone of the Reserve Busbar 2 of the 400kV Metal-enclosed Gas Insulated Switchgear (GIS) installation. The leak was caused by a missing O Ring seal on the gas density monitor.
Total IIG leakage associated with event	6.115kg of SF ₆ (148.95 tonnes CO ₂ e)
Value of IIG volume in claim, using the central carbon value price per tonne of CO ₂ e ¹ (£)	£39,971.92

¹ As set out in the Green Book Supplementary Guidance

Date of notification to the Authority	1 November 2024
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Ofgem's view and 'minded-to' position

The claim was made to the Authority within 14 days of the incident, and as a result, complies with Special Condition 4.3.12(a). We also agree that SSEN met the criteria under Special Condition 4.3.12(b) for further evidence to be submitted within 30 days of the notification. Lastly, we consider that SSEN has met the criteria set out within Special Condition 4.3.13, in that the value of the volume of leakage exceeded the value of making the claim to Ofgem.

Under condition 4.3.12, the licensee must provide any evidence available which demonstrates that the event was not attributable to any error on the licensee's part; and any evidence available that the licensee took reasonable preventative and mitigating actions before and after the event to limit its effect. Based on the evidence provided, our view is that SSEN has not demonstrated this, and the event could have been reasonably foreseen and prevented.

For an event to be beyond a company's reasonable control the company should demonstrate that its actions or inactions (including those of its agents, employees, contractors etc. working on its behalf) in respect of the trigger event did not materially contribute to the failure event. SSEN's report notes that an installation error during construction was the primary cause of the leak, and the absence of an operational online gas density monitoring system likely exacerbated the leak's impact. The absence of a functioning gas density monitoring system was within SSEN's reasonable control and this precludes the concern about foreseeability of the installation error. In addition, whilst the installation error was committed by a contractor, this contractor was working on behalf of SSEN which falls under SSEN's responsibility.

Therefore, our minded-to position is to reject the claim made by SSEN.

Should you like you make any representations on the proposed direction, please direct them to John.Kennedy@ofgem.gov.uk by **6 June 2025**. We will consider all responses before making a decision on SSEN's IIG Exceptional Event claim.

Yours sincerely,

David McCrone

Head of Price Control Operations Policy
Duly authorised on behalf of the Authority
9 May 2025