Consultation

Eight SHET projects - ASTI Pre-Construction Funding and proposed Modification to special conditions of the electricity transmission licence

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Response deadline:	07 November 2025
Contact:	James Santos-Mansur
Team:	Major Projects Delivery
Telephone:	020 7901 7000
Email:	MajorProjects.LTPD@ofgem.gov.uk

We are consulting on our minded to position on the Accelerated Strategic Transmission Investment (ASTI) Pre-Construction Funding (PCF) submission application by Scottish & Southern Electricity Networks Transmission (trading as Scottish Hydro Electric Transmission Plc – 'SHET') for eight electricity transmission projects as governed by SHET's electricity transmission licence (the Licence), Special Condition (SpC) 3.40 'Accelerated strategic transmission investment Pre-Construction Funding Re-opener, Price Control Deliverable and Use It Or Lose It Adjustment ($APCF_t$)'. We are also consulting on our corresponding proposed modification of SpC 3.40 to adjust the 'Total Value' referenced in Appendix 1 and the 'PCF Allowance' referenced in Appendix 2.

We would like views from people with an interest in new transmission infrastructure, meeting the net zero challenge, and competition in onshore transmission networks. We particularly welcome responses from consumer groups, stakeholders impacted by the project, stakeholders with an interest in the costs of electricity transmission infrastructure, and transmission owners. We would also welcome responses from other stakeholders and the public.

This document outlines the scope, purpose, and questions of the consultation and how you can get involved. Once the consultation is closed, we will consider all responses. We want to be transparent in our consultations. We will publish the non-confidential responses we receive alongside a decision on next steps on our website at ofgem.gov.uk/consultations.

Contents

Executive summary

Under the Scottish Hydro Electric Transmission Plc (SHET) electricity transmission licence,[1] SHET can request additional Accelerated Strategic Transmission Investment (ASTI) Pre-Construction Funding (PCF) where costs are expected to exceed the initial allowance by more than the SHET's Materiality Threshold of £7m or where additional ASTI PCF Price Control Deliverables (PCDs) are being added to the framework. The starting ASTI PCF allowance for SHET's project portfolio was set at 2.5% of SHET's forecast total expenditure (totex) as set out in our ASTI decision.[2]

Pre-Construction Works are the activities undertaken for the purposes of narrowing down design options to develop an ASTI project, with the output being the submission of all material planning applications. The activities that constitute Pre-Construction Works that SHET is permitted[3] to incur expenditure on are:

- Surveys, assessments and studies
- Project design
- Engineering development
- Stakeholder engagement and consultation
- Tasks associated with acquiring land rights (which could include permanent rights and/ or wayleaves)
- Planning applications
- Tender activities
- Other activities as may be approved by Ofgem.

As part of the ASTI PCF re-opener mechanism, we form our minded to position and consult on whether the requested ASTI PCF activities are appropriate for submission of all material planning applications, will contribute to the acceleration of project delivery, and whether the relevant costs are efficient.

[1] Licences and licence conditions, Electricity licences and conditions, Transmission Licence, Scottish Hydro Electric Transmission Plc – Special Conditions
[Special Condition (SpC) 3.40 'Accelerated strategic transmission investment Pre-Construction Funding Re-opener, Price Control Deliverable and Use It Or Lose It Adjustment ($APCF_t$)' - Part C: Scope of the ASTI Pre-Construction Funding Re-opener]
[2] Decision on accelerating onshore electricity transmission investment, Table 5: ASTI funding and approval process
[3] Decision to modify the special licence conditions in the electricity transmission licences: Accelerated Strategic Transmission Investment, Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document, paragraph 3.2

On 13 February 2024, in line with SpC 3.40.7[4] and the ASTI Guidance and Submission Requirements Document,[5] SHET submitted the required minimum eight-week advance notice that it was going to make an ASTI PCF application regarding eight electricity transmission projects.[6] SHET's application[7] was subsequently made on 30 October 2024.

Minded to position

Our minded to position is to amend the allowances set out in Appendix 1 ('Total Value') and Appendix 2 ('PCF Allowance') of SpC 3.40 'Accelerated strategic transmission investment Pre-Construction Funding Re-opener, Price Control Deliverable and Use It Or Lose It Adjustment ($APCF_t$)' in SHET's electricity transmission licence (the Licence) to reflect SHET's full ASTI PCF expenditure request. The updated allowance values will be captured in the latest version of SHET's ASTI Confidential Annex.

Next steps

We welcome responses to our consultation on the specific questions we have included in Chapter 2. If you would like to respond to this document, then please send your responses to: MajorProjects.LTPD@ofgem.gov.uk. The deadline for responses is 07 November 2025. We aim to publish our ASTI PCF decision and the decision to modify SHET's licence in winter 2025.

[4] Licences and licence conditions, Electricity licences and conditions, Transmission Licence, Scottish Hydro Electric Transmission Plc – Special Conditions
[5] Decision to modify the special licence conditions in the electricity transmission licences: Accelerated Strategic Transmission Investment, Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document, paragraph 3.12
[6] See paragraph 1.1
[7] See paragraph 2.2

1. Introduction

Section summary

This section highlights the purpose of our consultation. It also provides links to documents related to the consultation, explains the consultation process, timelines and how you can respond, and explains how your personal data will be handled.

Purpose of this consultation

1.1 This document sets out our minded to position on SHET's ASTI PCF application related to the following eight 'Accelerated Strategic Transmission Investment' (ASTI) projects[8] which have the following Network Options Assessment (NOA)[9] codes:

Onshore (six projects)

- BLN4: Beauly to Loch Buidhe 400kV Reinforcement
- SLU4: Loch Buidhe to Spittal 400kV Reinforcement
- BBNC: Beauly to Blackhillock 400kV Double Circuit
- BPNC: Blackhillock and Peterhead 400kV Double Circuit
- BDUP: Beauly to Denny 275kV Circuit to 400kV
- TKUP: East Coast Onshore 400kV Phase 2 reinforcement

Offshore (two projects)

- PSDC: Spittal to Peterhead 2GW HVDC Subsea link
- BIDC: Arnish to Beauly (Western Isles) HVDC link

1.2 Chapter 2 summarises our view on the ASTI PCF application at this stage and our minded to decision. Our consultation questions are:

- Q1: Do you agree with our minded to position to provide additional ASTI PCF?
- Q2: Do you agree with our proposed modification to adjust Appendix 1 and 2 of SpC 3.40?

1.3 Our assessment and minded to position set out in this document are subject to our consideration of any consultation responses and we invite stakeholders to respond using the contact details set out on the front of this document.

[8] Decision on accelerating onshore electricity transmission investment, Table 2
[9] Network Options Assessment (NOA)

Context and related publications

1.4 Decision on accelerating onshore electricity transmission investment: Ofgem.gov.uk/publications/decision-accelerating-onshore-electricity-transmission-investment

1.5 Decision to modify the special licence conditions in the electricity transmission licences and corresponding Associated Document: Accelerated Strategic Transmission Investment, Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document: Ofgem.gov.uk/publications/decision-modify-special-licence-conditions-electricity-transmission-licences-accelerated-strategic-transmission-investment

Consultation stages

1.6 **Stage 1** Consultation open: 10 October 2025

1.7 **Stage 2** Consultation closes (awaiting decision). Deadline for responses: 07 November 2025

1.8 **Stage 3** Responses reviewed and published: Winter 2025

1.9 **Stage 4** Consultation outcome (licence modification decision): Winter 2025 (if applicable – licence modifications come into effect a minimum of 56 days after the licence modification decision).[10]

How to respond

1.10 We want to hear from anyone interested in this consultation. Please send your response to the person or team named on the front page of this document.

1.11 We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

1.12 We will publish non-confidential responses on our website.

Your response, data, and confidentiality

1.13 You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information. For example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations, or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

1.14 If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those

[10] Section 11A(9) of the Electricity Act 1989

that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential and which can be published. We might ask for reasons why.

1.15 If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the United Kingdom's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 3.

1.16 If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

How to track the progress of a consultation

1. Find the web page for the call for input you would like to receive updates on.
2. Click ‘Get emails about this page’, enter your email address and click Submit.
3. You will receive an email to notify you when it has changed status.

1.17 A consultation has three stages: ‘Open’, ‘Closed (awaiting decision)’, and ‘Closed (with decision)’.

2. ASTI PCF assessment

Section summary

This chapter summaries SHET's application and sets out our minded to position.

Brief description of the eight projects

2.1 A map displaying the existing network and proposed new infrastructure as well as a brief description of the eight SHET projects are included in Appendix 1.

ASTI PCF application

2.2 SHET made an application for ASTI PCF under Part C of SpC 3.40 of their licence to enable additional funding of Pre-Construction Works related to eight projects. Key Pre-Construction Work activities and ASTI PCF allocations are in Appendix 2.

Table 1: ASTI PCF application

Project	On/offshore	ASTI PCF allowance[11]	ASTI PCF spend to date[12]	ASTI PCF updated request
BLN4	Onshore	2.5%	2.7%	9.3%
SLU4	Onshore	2.5%	2.0%	7.7%
BBNC	Onshore	2.5%	2.3%	4.4%
BPNC	Onshore	2.5%	4.9%	10.5%
BDUP	Onshore	2.5%	8.0%	13.8%
TKUP	Onshore	2.5%	6.3%	16.6%
PSDC	Offshore	2.5%	1.5%	3.8%
BIDC	Offshore	2.5%	2.1%	3.9%
Portfolio		**2.5%**	**2.8%**	**6.5% (3.9%[13])**

[11] Decision on accelerating onshore electricity transmission investment, paragraph 5.18
[12] Expenditure incurred on ASTI PCF activities up to September 2024
[13] 3.9% is the ASTI PCF updated request using SHET's updated estimated actual project costs

Additional costs

2.3 SHET states that the key costs driving its updated ASTI PCF expenditure request are:

- completion of detailed design activities undertaken with its supply chain partners to support the accelerated timescales to submit planning applications.
- surveys to support the preparation of environmental impact assessments and understanding of Biodiversity Net Gain (BNG) requirements in line with the National Planning Framework 4 (NPF4).
- the additional recruitment associated with acceleration due to the need to conduct project development activities concurrently.
- undertaking multiple extensive consultations with stakeholders and the preparation of planning submissions to support timely consenting decisions.
- enhanced ground investigation (GI) for overhead lines (OHL), substations, and converter sites to provide greater certainty on project requirements and to reduce the risk of unexpected conditions in the construction phase.
- securing initial agreements for land and wayleaves across numerous landholders.

2.4 SHET states that the constrained and competitive supply chain for both equipment and contractors have necessitated that they engage in earlier completion of activities to initiate procurement works and that they commence early design for projects to provide design maturity and certainty, which in turn helps secure planning consents. SHET also highlights that there are higher costs associated with accelerated delivery, such as having to undertake multiple route surveys and onboarding contractors earlier into projects.

2.5 SHET notes that the level of enhanced pre-construction activity is occurring at an earlier stage in the process than for non-ASTI projects. SHET highlights examples of these activities such as:

- developing increased levels of accuracy in substation design at an earlier stage to provide greater clarity and certainty on land requirements. This facilitates agreements being reached with landowners earlier than typical timescales.
- conducting statutory environmental surveys across multiple sites ahead of the conclusion of the site selection process, where required, to ensure surveys are not delayed due to seasonal requirements. This mitigates the risk of delays to submission of planning applications.

- enhanced levels of GI works to reduce the risk of unexpected ground conditions causing delays in the construction phase, as well as providing greater certainty on project requirements which will lead to more certain costs come project assessment.
- undertaking offshore marine surveys during winter months – these are normally undertaken during the spring or summer months to reduce weather risk, however they have needed to occur during the winter months due to the need for acceleration under the ASTI regime.

2.6 SHET states that their updated ASTI PCF request is required to help ensure their portfolio of projects meet their required in-service dates (RISDs).

Our minded to position

2.7 We consider that the activities identified by SHET fall within the ASTI PCF permitted[14] work activity areas.

2.8 We recognise that the challenging supply chain situation across Europe coupled with ASTI projects' need for accelerated delivery is likely to have driven earlier engagement in terms of Pre-Construction Work activities and that this in turn helps mitigate risk and safeguard programme delivery. We also recognise that earlier completion of Pre-Construction Work activities helps provide a more informed submission towards securing planning consents.

2.9 We anticipate that the ASTI PCF requested will enable pre-construction activities required for project acceleration, thereby helping safeguard overall programme delivery and reduce potential constraint costs for consumers.

2.10 We are comfortable that the timing of these works will occur earlier within an accelerated project lifecycle to meet RISD, and that this timing has changed the expenditure profile of SHET's portfolio. The result of this is SHET requesting 6.5% ASTI PCF as per Table 1 above. At the time of our ASTI decision,[15] SHET had stated that their ASTI PCF requirements would exceed our ASTI PCF allowance of 2.5% citing costs associated with accelerating project development as a key driver.

2.11 The ASTI PCF is attached to a use it or lose it (UIOLI) regulatory mechanism. The aim of the mechanism is to protect consumers by ensuring that funding allocated to specific projects is used for that given purpose. In the case of the ASTI PCF, we have a required deliverable which is the submission of all material planning consent applications for the SHET projects listed in Table 1 by 31 March 2026. If

[14] Decision to modify the special licence conditions in the electricity transmission licences: Accelerated Strategic Transmission Investment, Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document, paragraph 3.2
[15] Decision on accelerating onshore electricity transmission investment, paragraph 5.18

this deliverable is not fully met, an assessment and proportional UIOLI adjustment will be made to protect the interest of consumers.

2.12 It should also be noted that SHET's ASTI PCF request reflects 6.5% of the indicative estimates for the delivery of ASTI projects back in 2022. When compared to the up to date, more market-informed cost estimates, the request is equivalent to 3.9% of SHET's estimated actual project costs.

2.13 Our minded to position is to approve SHET's full updated ASTI PCF request.

Questions

Q1. Do you agree with our minded to position to provide additional ASTI PCF?

Q2. Do you agree with our proposed modification to adjust Appendix 1 and 2 of SpC 3.40?

3. Next steps

3.1 Our consultation on the positions set out in this document will close on 07 November 2025.

3.2 We aim to publish our ASTI PCF decision in winter 2025 and, subject to the outcome of the consultation, this will be alongside the decision to modify SHET's licence in accordance with section 11A of the Electricity Act 1989.

3.3 The proposed modifications to Appendix 1 and 2 of SpC 3.40 are set out in the accompanying document to this consultation.

Send us your feedback

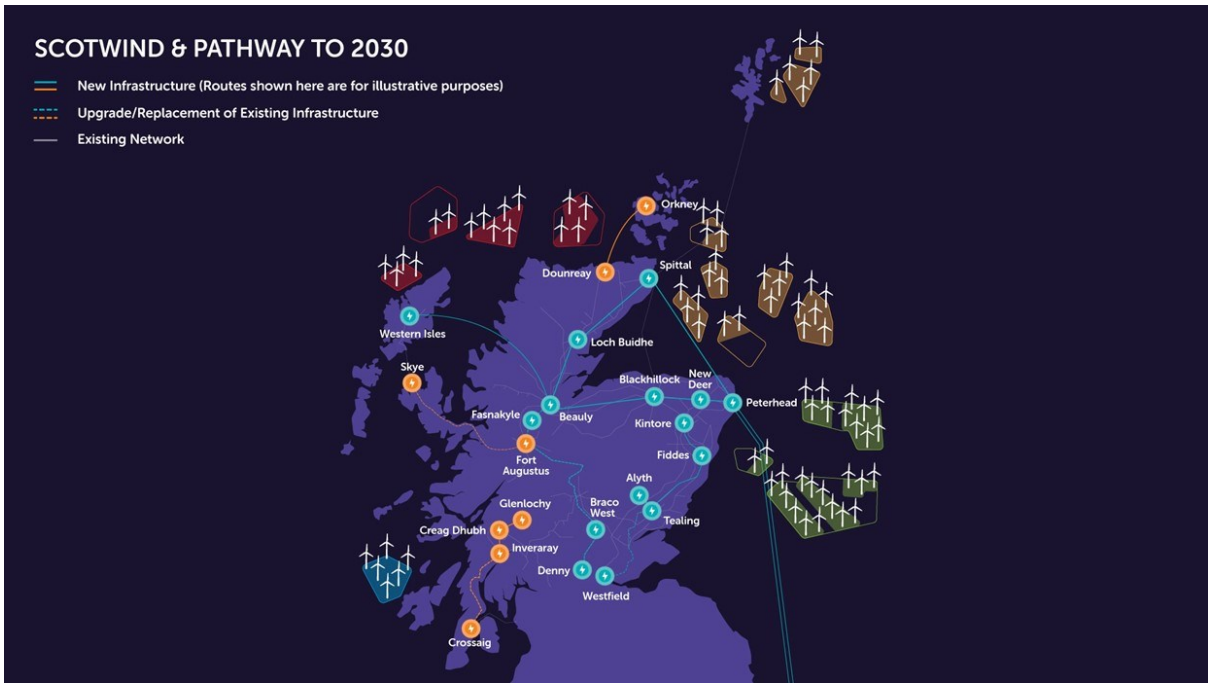
We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this consultation. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Do you have any further comments?

Please send your feedback to stakeholders@ofgem.gov.uk.

Appendix 1. Map and brief description of the eight SHET projects

A1.1 Existing network and proposed new infrastructure



A1.2 Brief description of the eight SHET projects. Note: NOA codes are in brackets.

Projects	Overview
Beauly to Loch Buidhe 400kV Reinforcement (BLN4)	Beauly to Loch Buidhe 400kV Reinforcement (BLN4) is an onshore electricity transmission project along with Loch Buidhe to Spittal 400kV Reinforcement (SLU4) to construct a new 170km 400kV double circuit OHL between Spittal 400kV substation and Beauly 400kV substation, a new 400kV substation at Loch Buidhe, a new 400 kV double busbar substation at Spittal, and reinforce existing substations at Loch Buidhe and Spittal. The project is triggered by the need for onshore transmission network enabling works for the connection of ScotWind schemes. Its aim is to enable significant power transfer capability required to transport power from onshore and offshore renewable generation connecting in Caithness to Beauly, and to the east via BBNC/BPNC, before onward transportation at Peterhead via Peterhead to Drax (E4D3) and Peterhead to South Humber (E4L5) to demand centres in England.
Loch Buidhe to Spittal 400kV Reinforcement (SLU4)	Same as above.

Projects	Overview
Beauly to Blackhillock 400kV Double Circuit (BBNC)	Beauly to Blackhillock 400kV Double Circuit (BBNC) is an onshore electricity transmission project, along with Blackhillock and Peterhead 400kV Double Circuit (BPNC), to construct new 110km 400kV double circuit OHL between new Beauly 400kV substation and new Blackhillock 400kV substation and 82km 400kV double circuit OHL between new Blackhillock 400kV substation, new New Deer 400kV substation and new Peterhead 400kV substation. Additionally, to construct new 400kV substations at Beauly, Blackhillock, New Deer, Peterhead, and a 132kV substation at Peterhead. The project is triggered by the need for onshore transmission network enabling works required to utilise E4D3 and E4L5. Its aim is to enable significant power transfer capability to transport power from onshore and offshore renewable generation connecting on the west – from the Arnish to Beauly 1.8GW HVDC link - and from connections north of Beauly (via BLN4/SLU4) – to the east before onward transportation at Peterhead via E4D3 and E4L5 to demand centres in England.
Blackhillock and Peterhead 400kV Double Circuit (BPNC)	Same as above.
Beauly to Denny 275kV Circuit to 400kV (BDUP)	Beauly to Denny 275kV Circuit to 400kV (BDUP) is an onshore electricity transmission project to install infrastructure with the aim of allowing the existing Beauly Denny OHL second circuit to change operation from 275kV to 400kV, to construct new 400kV substations at Beauly 2, Fasnakyle, Fort Augustus, and Braco West, and to aim to extend Kinardochy/ Errochty / Tummel substation. The project is triggered by the need for onshore transmission network enabling works for the connection of ScotWind schemes and Coire Glas. BDUP has key interactions with Beauly to Loch Buidhe 400kV reinforcement (BLN4) / Loch Buidhe to Spittal 400kV reinforcement (SLU4), Beauly to Blackhillock 400kV double circuit (BBNC) / Blackhillock and Peterhead 400kV double circuit (BPNC), Arnish to Beauly 1.8GW HVDC link. The Beauly 2 substation incorporates BLN4&SLU4 /BDUP/BBNC schemes.

Projects	Overview
East Coast Onshore 400kV Phase 2 reinforcement (TKUP)	East Coast Onshore 400kV Phase 2 reinforcement (TKUP) is an onshore electricity transmission project to construct 400kV substations at Tealing and Fiddes, extend Kintore substation, construct a new 106km 400kV double circuit OHL between Kintore-Fiddes and Tealing 400kV substations, reconductor and reinsulate the existing 38km of OHL to accommodate 400kV double circuit operation at Tealing to Glenrothes, reconductor and reinsulate the existing 38km of OHL to accommodate 400kV double circuit operation. The project is triggered by the need to enable significant power transfer capability required to transfer from onshore and offshore renewable generation in the North and Northeast of Scotland which cannot wholly be accommodated by E4D3 and E4L5. TKUP has key interactions with Beauly to Blackhillock 400kV double circuit (BBNC) / Blackhillock and Peterhead 400kV double circuit (BPNC), East Coast coordinated offshore network.
Spittal to Peterhead 2GW HVDC Subsea link (PSDC)	Spittal to Peterhead 2GW HVDC Subsea link (PSDC) is an offshore electricity transmission project to construct a 2GW HVDC subsea link from a new 400kV substation at Spittal to a 400kV substation at Peterhead, including to construct 2GW bi-pole HVDC converter stations within the Spittal and Peterhead areas, establish HVAC connections, and install c.200 km of HVDC cables. The project is triggered by the need for onshore transmission network enabling works for the connection of ScotWind schemes and its aim is to enable power transfer capability to transport generation from the far north of Scotland to the east coast of Peterhead.
Arnish to Beauly (BIDC - Western Isles) HVDC link	Arnish to Beauly (Western Isles) HVDC link is an offshore electricity transmission project to facilitate the transfer of 1.8GW of renewable generation from the Isle of Lewis in the Western Isles to the Beauly area in the North of Scotland. The project is triggered by the need for the Arnish to Beauly 1.8GW HVDC link to look to secure lower cost energy by connecting several onshore and offshore renewable wind projects.

Appendix 2. Key activities and ASTI PCF allocations

A2.1 Onshore overview

Key activities	Status
• Selection of substation sites • Concluded initial routing assessment using 'Optioneer' software and services • GI completed at substations • Baseline background noise surveys • LiDAR surveys undertaken for overhead lines on multiple route options • Concluded initial 3D models of substations for consultation events • Contractors have concluded Phase 2A of the Early Contractor Engagement 'Consultation Design' • Concluded at least two rounds of community and stakeholder consultation with support from consultants • Land referencing of landowners and initial engagements concluded • Pre-Application Consultation events	Completed
• Ornithological surveys • Environmental Impact assessment (including, Screening and Scoping) • Contractors have commenced Phases 2B and 2C of the Early Contractor Engagement 'Consultation Design' • Preparation of works information for Detailed Preconstruction Designs • Land negotiations and engagement with key stakeholders • Noise assessment • Preparation of Works Information for Detailed Preconstruction Designs • Service diversions prior to site works commencement dates • Network upgrades for Permanent and Temporary supplies for the substation site • Discharge of planning conditions • Engagement with specialist consultants to develop BNG & Peat Management Strategy	Ongoing / Upcoming

A2.2 Onshore overview: activity breakdown

Allowed ASTI PCF	Activities
Project design and Engineering development	• Providing specifications for the design and construction of new substation and OHL infrastructure, supporting the development and specification of GI works, liaising with external bodies e.g. Roads Authority and providing

Allowed ASTI PCF	Activities
	assessment of design deliverables submitted by external consultants and contractors
Stakeholder engagement and consultation	• Undertaking statutory consultations to support the submission of Planning Applications via in person and online events. These include provision of 3D modelling and various forms of information including booklets and banners. • In addition, undertaking engagement with stakeholders to gain support for the projects and to share information on these, undertaking campaigns and advertising to provide information on ASTI across our Transmission area
Tasks associated with acquiring land rights (which could include permanent rights and/or wayleaves)	• Key activities include managing GI Compensation, progressing of Wayleave/Servitude Options for OHLs, Construction Disturbance negotiations for those impacted by the proposed works, managing and working with Land Agents to agree access and necessary purchases, Compulsory Purchase Order progression and negotiating the agreements for the purchase of land for the substations
Environmental surveys, assessments and studies	• Progression of surveys and assessments to support the Environmental Impact Assessments required to be submitted with the relevant Consent Applications for Substations and Overhead Lines and assessment of requirements for Biodiversity Net Gain (BNG)
Tender activities	• Substation and OHL contractors have been appointed to provide the necessary level of detailed design to support the development of the Consent Applications to allow the projects to progress into construction and operation • In addition, identification of long lead items of equipment that require to be secured under Early Construction Funding is being progressed with the appointed supply chain • Allocation of further works including forestry felling is to be progressed via engagement with the supply chain
Other activities as may be approved by Ofgem:	• Internal SSEN-T staff providing services including Project Management, Environmental and Consenting support and management, Engineering Management and Design, Land Negotiations and Agreements, Risk Analysis,

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Allowed ASTI PCF	Activities
Staff costs across the PCF project portfolio	Quality Management, Programme Management, Financial Management, Procurement of Equipment and Services, Community and Stakeholder Engagement, Legal Services and Governance support

A2.3 Offshore overview

Key activities	Status
• Concluded initial DC cable routing assessment • Peat probing surveys completed • Initial site ground investigation (GI) undertaken • Concluded baseline background noise surveys • Concluded initial 3D models of substations and HVDC Converter for public engagement • Concluded statutory stakeholder consultation with multiple parties including local authorities, community councils and third-party developers for progression of design development for EIA and Planning Application • Land referencing of landowners and initial engagements concluded • Pre-Application Consultation events for Convertor locations • On-site non-intrusive UXO desktop surveys • Desktop UXO assessments • Additional offshore marine surveys for the DC cable route and for the Saballeria Spinulosa area off Aberdeenshire coast (PSDC) • Allocation of Tier 1 Delivery contractors – DC Cables, HVDC equipment, earthworks & civils and HVDC buildings	Completed
• Design development for submission of planning applications for the substations and HVDC Converter • Land and seabed lease negotiations and engagement with key stakeholders • Development of 3D models with options to assist the conclusion of site selection • Site selection conclusion • Topographic survey of mainland cable route • Anormal Load and Public Road Improvement Study for Cable Installation • Pre – Application Consultation events • Noise assessment • Environmental Impact assessment (including, Screening and Scoping) and associated surveys • Early Contractor Engagement ‘Consultation Design’	Ongoing / Upcoming

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Key activities	Status
• Preparation of Works Information for Detailed Preconstruction Designs • Ground Investigation works on cable route and selected site • Development of service diversions prior to site works commencement dates • Network upgrades for Permanent and Temporary supplies for the substation site • Discharge of Town and Country planning / marine licence conditions • Engagement with specialist consultants to develop BNG & Peat Management Strategy • Onshore DC cable route GI works • Feasibility studies for Horizonal Directional Drilling at both landfalls and crossings • Preparation of Voluntary Environmental appraisal for onshore cable routes	

A2.4 Offshore overview: activity breakdown

Allowed ASTI PCF	Activities
Project design and Engineering development	• Providing specifications for the design and construction of new substations and HVDC Converter station as well as Cable infrastructure • Supporting the development and specification of GI works, liaising with external bodies e.g. Roads Authority and providing assessment of design deliverables submitted by external consultants and contractors • Preliminary site works, i.e. site clearance, service diversions, new service connections, new road upgrades • Marine Geophysical and Geotechnical surveys • Marine and terrestrial UXO surveying • HDD feasibility assessments for all relevant land falls and crossing points • SME consultancy support for items listed above (as required)
Stakeholder engagement and consultation	• Undertaking voluntary and statutory consultations with local community groups and other statutory bodies to support the submission of Planning Applications via in person and online events. These include provision of 3D

Allowed ASTI PCF	Activities
	modelling and various forms of information including booklets and banners • In addition to these events, the project team have facilitated meetings with other stakeholders including third party developers, neighbouring businesses, statutory consultees and consenting authorities. The reasons for this include management of interfaces, to consider constructability issues, to understand the projects constraints and specific requirements to progress and to share information about the project's plans as well as the plans of the wider ASTI portfolio. GI Compensation, Wayleave/Servitude Options for cabling, Construction Disturbance, Land leasing fees, Agents & legal fees
Tasks associated with acquiring land rights (which could include permanent rights and/or wayleaves)	• Managing GI Compensation • Progression of Wayleave/Servitude Options for Cables • Construction Disturbance negotiations for those impacted by the proposed works • Managing and working with Land Agents to agree access and necessary purchases of land Compulsory Purchase Order progression and negotiating the agreements for the purchase of land for the substations • Offshore crown estate and marine licence fees. • Land negotiations for BNG offset
Environmental surveys, assessments and studies	• Progression of surveys and assessments to support the Environmental Impact Assessments required to be submitted with the relevant Consent Applications for Substations and cables and assessment of requirements for BNG • Environmental consultancy support • Proportionate share of production of Environmental Appraisals for converter sites • Production of voluntary Environmental Appraisal for land cable routes • Production of Marine Environmental Appraisal
Tender activities	• Supplier selection, appointment, and contract placement with providers of HVDC Convertor

Allowed ASTI PCF	Activities
	Equipment, HVDC Cable (onshore and marine), civils, employers civils design, and AC Substation equipment • Appointment and engagement of general procurement appointments including, but not limited to, FEED consultants, environmental consultants, Civil Engineering & Design Consultants, GI contractors, Marine Survey contractors and other SMEs to progress the design of the project to a suitable level required for development of the Consent Applications to allow the projects to progress into construction and operation • Further procurement activities may be required as identified following the works above being undertaken. A monthly project procurement plan meeting takes place, which interrogates ongoing works and future works required. The procurement plan feeds into the monthly hub reporting
Other activities as may be approved by Ofgem: Staff costs across the PCF project portfolio	• Internal SSEN-T staff providing services including Project Management, Environmental and Consenting support and management, Engineering Management and Design, Land Negotiations and Agreements, Risk Analysis, Quality Management, Programme Management, Financial Management, Procurement of Equipment and Services, Community and Stakeholder Engagement, Legal Services and Governance support

Appendix 3. Privacy policy

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, "Ofgem"). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

Information: Include here all organisations outside Ofgem who will be given all or some of the data. There is no need to include organisations that will only receive anonymised data. If different organisations see different set of data then make this clear. Be a specific as possible.

5. For how long we will keep your personal data, or criteria used to determine the retention period

Your personal data will be held for (be as clear as possible but allow room for changes to programmes or policy. It is acceptable to give a relative time e.g. 'six months after the project is closed').

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it

- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at https://ico.org.uk/, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas (Note that this cannot be claimed if using Survey Monkey for the consultation as their servers are in the US. In that case use "the Data you provide directly will be stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in term of data protection will not be compromised by this".

8. Your personal data will not be used for any automated decision making

9. Your personal data will be stored in a secure government IT system (If using a third party system such as Survey Monkey to gather the data, you will need to state clearly at which point the data will be moved from there to our internal systems).

10. More information For more information on how Ofgem processes your data, click on the link to our "ofgem privacy promise".