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Ocean Winds' Response to the Ofgem Consultation on the Draft Centralised Strategic Network Plan Guidance

Ocean Winds develops, finances, builds, and operates offshore wind farms around the globe and is a 50-50 joint venture with Engie and EDP Renewables. The UK is one of our key markets with nearly 2GW of operational assets and an additional 4GW of projects in our development pipeline.

Consultation Response

Q: We're proposing that offshore connections should be planned within the scope of the CSNP. We set out our requirements on the licensee with regards to this additional scope (see chapter 10: Electricity - offshore network planning in the CSNP). What are your views on this proposal?

While we support the principle of combining spatial and electrical coordination in offshore network development, we are concerned about the inclusion of electrically coordinated options where no clear regulatory framework or delivery body currently exists to facilitate implementation.

The Holistic Network Design (HND) and the Holistic Network Design Follow Up Exercise (HNDFUE) have not been successful. They have created many years of uncertainty regarding generation connections because detailed designs have altered the recommendations from the published HND/HNDFUE reports. What initially appeared to be coordinated designs have become separate radial connections through detailed assessment. It remains uncertain whether this issue will persist under the proposed Centralised Strategic Network Plan (CSNP). For the CSNP to be effective for its intended purpose, it is essential that these issues experienced with the HND and HNDFUE are not replicated.

We believe that any electrically coordinated options included in the CSNP must be supported by a clear and viable delivery pathway. One practical step could be the early

appointment of Offshore Transmission Owners (OFTOs) for coordinated offshore designs. Early OFTO involvement could help de-risk delivery, streamline coordination, and provide greater confidence to investors.

Additionally, offshore coordinated network planning requires a regulatory framework aligned with the options discussed in paragraph 10.22 of the Electrical Coordination vs Spatial Coordination section. These options include meshed offshore networks, bootstraps, windfarm-to-windfarm links, and Offshore Hybrid Assets (OHAs). However, it remains unclear who will be responsible for delivering these offshore coordinated networks.

The cost-benefit analysis proposed in paragraph 10.23 for evaluating different forms of coordination must be comprehensive enough to account for the consequential costs of coordinated designs on offshore wind. This includes the potential impact on electricity pricing for the end consumer as generators would need to price into its Contract for Difference price the risk associated with the reliance on a third-party (e.g. other wind farm developers or interconnector developers) to deliver the generator's grid connection with no commercial protection available for late delivery.

Given the scope of works that must be completed in the coming years to provide a coordinated, whole-system approach to planning the electricity transmission network, the risk profile for grid delays is significantly increasing, and developers are currently left entirely exposed. Developers need commercial protections in the event of delays caused by transmission operators (TOs) to account for lost revenue, unforeseen construction costs, and other financial impacts—which are quite material so early on in a project's operation.