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Submitted via email only.

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Bruxelles, le 01/09/2025

Elia Transmission Belgium response to:

“Consultation on the draft Centralised Strategic Network Plan Guidance”

Dear Mr. Bishop,

Elia Transmission Belgium, as Belgian TSO and as member of the Offshore TSO Collaboration (OTC), welcomes NESO's CSNP methodology, especially its commitment to coordinated planning and the harmonisation of offshore and onshore design phases, with a view to facilitating the integration of OHAs into the GB system.

The OTC, established in 2022, brings together transmission system operators from the countries bordering the Northern Seas to advance the development of offshore network infrastructure in alignment with the objectives set by the Esbjerg and Ostend declarations. Over the past three years, the OTC has worked collectively to support the vision of transforming the Northern Seas into “The Green Power Plant of Europe.” A particular area of focus has been regional cooperation in planning, through which the OTC seeks to identify and promote offshore hybrid interconnectors (or Offshore Hybrid Assets, OHAs, in GB terminology) across the Northern Seas. The initial outcomes of these efforts were published in April 2025 in the OTC's third expert paper [“Joint Planning in Europe's Northern Seas”](#).

To date, cross-border interconnector planning in GB has primarily followed a market-driven, developer-led model. This is a peculiarity in relation to the approach applied by other TSOs in the EU, which are following a centralised planning also for interconnectors. While the GB approach has fostered innovation and flexibility in offshore infrastructure development, the recent Ofgem Window 3 process in 2024 highlighted certain limitations. In particular, a number of cross-border project proposals were rejected due to the considerable constraint costs they would have imposed on the GB system, illustrating the low level of strategic coordination with broader GB transmission and generation plans.

We therefore recognise and support NESO's efforts to address these challenges by adopting a holistic, top-down planning approach. In this way, continued coordination will help to ensure that projects jointly identified and endorsed by the OTC can be effectively integrated and developed within the GB system, thereby maximising their value and feasibility for both Great Britain and the wider Northern Seas region.

Looking ahead to the implementation of the first CSNP cycle, we welcome NESO to continue its active engagement with the OTC, as has been the case to date, to ensure that OTC's regional work and contributions are fully integrated into the CSNP planning process and consequently to clarify the interfaces between the NESO's and OTC's planning process.

Yours sincerely,

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