

1 September 2025

Ofgem
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London E14 4PU

By email: strategicplanning@ofgem.gov.uk

GB Interconnectors' Forum response to Ofgem's consultation on Draft Centralised Strategic Network Plan (CSNP)

Dear Sir/Madam,

The GB Interconnectors' Forum (**GBIF**) appreciates the opportunity to respond to the consultation (**Ofgem CSNP Consultation**) on the Draft Centralised Strategic Network Plan (**CSNP**).

GBIF is an industry group representing interconnector projects with a Great Britain connection point. Our membership represents interconnectors at various stages of their lifecycle, from development and construction to operational. Our members are international and are a mix of private developers and TSO subsidiaries engaged in interconnector development. GBIF serves as a collective voice for the interconnector sector, advocating for policies and frameworks that support the efficient development and operation of these important transmission assets. Interconnectors play a vital role in enhancing GB's energy security, enabling renewable energy integration, and delivering affordable and reliable electricity to consumers.

Members of GBIF have previously considered the CSNP in the context of NESO's consultation on CSNP¹ (**NESO CSNP Consultation**).

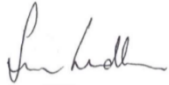
Please find attached GBIF's response to the NESO CSNP Consultation. GBIF's responses to the NESO CSNP Consultation also apply to this Ofgem CSNP Consultation and we request Ofgem considers the attached response as if it was a response to this Ofgem CSNP Consultation.

¹ [CSNP draft methodology Consultation](#)

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We are available to discuss further any of the points made above.

Yours faithfully,



Simon Ludlam
Chairperson

GB Interconnector Forum
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1 August 2025

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Dear Sir/Madam,

The GB Interconnectors' Forum (**GBIF**) appreciates the opportunity to respond to the consultation on the Centralised Strategic Network Plan (**CSNP**).

GBIF is an industry group representing interconnector projects with a Great Britain connection point. Our membership represents interconnectors at various stages of their lifecycle, from development and construction to operational. Our members are international and are a mix of private developers and TSO subsidiaries engaged in interconnector development. GBIF serves as a collective voice for the interconnector sector, advocating for policies and frameworks that support the efficient development and operation of these important transmission assets. Interconnectors play a vital role in enhancing GB's energy security, enabling renewable energy integration, and delivering affordable and reliable electricity to consumers.

We outline below our key observations and recommendations.

CSNP Consultation Survey: Whole System Network Planning

- 1. Do you agree that NESO is intending to engage with the right stakeholder categories to successfully deliver the CSNP? (Page 18) - Do you have any additional comments on the stakeholder categories we are planning to engage with for the CSNP?**

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In general terms, we agree with the categories of stakeholders set out in the consultation, however we note that it will be of critical importance to develop which stakeholders are captured within each category. In particular, “Energy Industry” and the concept of “third parties” is very broad and it is important to ensure that all key stakeholders are captured here. For interconnector projects, it is crucial to ensure that private capital is consulted and that the CSNP is developed in a way to incentivise investment in further interconnector projects. We note that there is a lack of certainty around exactly how interconnector development will be impacted by the CSNP, as it could potentially lead to developers being required to pursue NESO-defined opportunities rather than playing a role in determining the optimal opportunities to pursue. GBIF’s members are keen to maintain as much flexibility as possible to allow private capital to assess and pursue opportunities as they arise rather than only selecting from pre-determined projects. This may unnecessarily limit potential projects which private capital might otherwise develop. In addition to maintaining as much flexibility as possible, it will be important to ensure that private developers have the opportunity to engage at an early stage and throughout the various stages under the CSNP.

It will also be important to engage with industry groups representing developers of projects, including in the case of electricity interconnectors the GB Interconnector Forum (**GBIF**). GBIF should be considered a key stakeholder and third party for the purpose of engagement at all stages of the CSNP.

In addition, we note that the CSNP would benefit from development of the approach to co-ordination with the EU and its Member States, particularly as it relates to the development of further offshore hybrid assets (**OHAs**) and cross-border interconnectors. While European engagement is captured as one of the inputs to the Strategic offshore analysis (figure 27, page 66), the extent of the proposed engagement is unclear and GBIF is of the view that this should be developed further to ensure that the CSNP is fit for purpose in the context of planning connections with GB’s European neighbours.

ENTSO-E has recently signed new Working Arrangements with the UK transmission system owners and operators, which marks a significant step in formalising post-Brexit co-operation. GBIF remains hopeful that the UK will continue to work with the EU following the May 2025 UK-EU summit with a view to the UK participating in the EU Internal Electricity Market. If this is achieved, the UK and NESO as the ENSTO-E representative for the UK TSOs and TOs will have an obligation to consider European initiatives and plans. It would be beneficial for the CSNP to plan for this level of engagement with ENTSO-E, which will be particularly important for the offshore grid, OHAs and interconnectors. However, if NESO does not become a member of ENTSO-E then NESO will continue to have limited insight into the development of interconnector projects within Member States. Since Brexit non-TSO developers have demonstrated an ability to foster relationships

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with neighbouring countries and their institutions, outside of any political constraints, to develop interconnector projects such as NeuConnect and Greenlink. This entrepreneurship and the ability to get projects done should not be discouraged by CNSP.

In addition, the UK is part of the Offshore TSO Collaboration (**OTC**) initiative under which offshore TSOs have been working together over the past three years on unlocking the potential of the North Seas. OTC have collaborated to advance infrastructure development in line with the objectives of the Esbjerg and Ostend Declarations (NSEC - North Sea Energy Cooperation). Both declarations aim to significantly increase the combined offshore wind capacity of the Northern Seas. The initial results of the joint study demonstrate how a regional approach to offshore grid development in the Northern Seas can offer both economic and environmental benefits for all Europeans.

The analysis includes a grid map that outlines promising cross-border projects. These projects are not considered in isolation but as part of a broader offshore regional grid in the Northern Seas, maximising synergies and cost efficiencies.¹ The consultation on the CNSP does not currently address how this type of European engagement will be captured in the future planning methodologies.

There is an opportunity for the CNSP to anticipate the UK, via ENTSO-E and OTC, to work with Northern Seas countries (and the European Commission) to develop an ambitious regional grid plan including offshore cooperation project sets. This planning exercise should be complemented by structured involvement of private developers and private capital providers.

- 2. Do you agree with our current position that the SEA/HRA assessment should not be extended to cover gas and hydrogen? (Page 28) - If you do not agree, can you provide a reason why? (Page 28)**

No response to this question.

- 3. Do you agree that the methodology steps (drive, identify, develop, appraise, deliver & plan publications) outlined in the whole system CSNP overview are appropriate for developing a whole system CSNP? (Page 29) - Do you have any comments on the specific assessment steps shared within the whole system CSNP overview? (Page 30)**

The methodology set out in the consultation is relatively high level and lacking in the clarity that GBIF members were expecting to see at this stage on inputs, CSNP outputs and the overall strategic planning process for further interconnectors and OHAs.

¹ [Expert Paper III Offshore TSO](#)

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In particular, there is a lack of clarity regarding how the methodology will interact with the development processes for real infrastructure projects, rather than theoretical opportunities. This limits the ability to provide detailed feedback on the methodology steps at this stage.

The UK's interconnector development has historically followed a developer-led model, supported by regulatory frameworks such as the Cap and Floor. The CSNP methodology, while logical in principle, lacks clarity on how it integrates with this existing model, particularly for real-world project development. Implementing the CSNP effectively will require wider reform, which lies outside the CSNP and NESO's remit.

4. Do you agree that the whole system approach for the centralised strategic network planning has been clearly set out in the CSNP draft methodology? (Page 30)

Disagree.

5. Do you agree that the outlined governance structure proposed in the methodology is appropriate to support the delivery of the whole system CSNP? (Page 34)

Neutral.

6. Do you agree that the membership, roles, and responsibilities set out for the governance process will support the delivery of a whole system CSNP? (Page 34)

Neutral.

7. Do you have any additional comments on the whole system approach we're taking for the CSNP? (Page 35)

The CSNP methodology has not been clearly or consistently set out for interconnectors, and key integration points remain unclear. GBIF members have identified the following issues with the approach as currently set out:

- Further detail is required to include cross-border coordination and interactions with existing development frameworks (e.g. engagement with connecting market TSOs and GB regulation alignment or the Offshore Transmission Coordination (OTC) process).
- The offshore design process is not well-articulated - it lacks detail on how interconnectors and neighbouring markets will be modelled and how

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outcomes will align with real-world interconnector development pathways.

- There is a risk of overly prescriptive offshore designs and connection point assumptions, as well as limited understanding of regulation alignment. For example, will the proposed approach require any changes to the current Cap & Floor regulation available to interconnector projects. If so, what changes will be made? How will Ofgem approach the regulation of interconnectors identified as needed by NESO under the CSNP but which are not commercially attractive to developers and investors?
- The methodology fails to reflect the unique characteristics of interconnector technologies.
- Interconnectors are inherently an international activity requiring the consent of a connecting country. Post Brexit NESO has a predominantly national remit with limited access to neighbouring energy institutions. The successful development of future interconnections should embrace a broader set of stakeholders, including private developers and capital, to improve the planning process.

8. Do you have any other comments on the overview of the whole system CSNP draft methodology that you would like to share?

None.

CSNP Consultation Survey: Electricity Network Planning

1. Do you agree with the scope and framework, consisting of the options funnel and delivery pipeline, for electricity transmission network planning? (Page 47) - Do you have any additional comments regarding the scope and framework for electricity planning in the CSNP?

GBIF members have identified the following issues with the proposed scope and framework:

- The methodology lacks clarity on key inputs, outputs, and how it will engage with real interconnector projects.
- Prescribed connection points, dates, connecting markets, cable routes and technologies, derived from theoretical assumptions, may not reflect

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real-world feasibility or a project's economic viability and could in turn restrict viable interconnector development.

- There is a risk that these rigid CSNP assumptions could unintentionally limit innovation and investment, especially for complex cross-border infrastructure.

Further engagement with interconnector developers is essential to ensure that the CSNP supports, rather than hinders, viable project delivery.

2. Do you agree with our approach to use both spatial and electrical coordination to develop offshore networks? (Page 66) - Do you have any additional comments regarding spatial and electrical coordination of offshore networks?

- The methodology lacks detail on how interconnectors and offshore hybrid assets (OHAs) will be assessed, with most of the focus placed on offshore wind
- There is concern regarding the assumption that interconnectors share the same spatial/electrical requirements as offshore wind or that wind-focused design models (e.g. Celtic Sea Round 5) can be applied to interconnectors. These assumptions risk misrepresenting the real-world nature of cross-border infrastructure.
- Further engagement with interconnector developers is essential to ensure that these issues are considered and addressed.

3. Do you agree with our plan to design using current cable standards to provide certainty for connections? (Page 66) - Do you have any additional comments regarding using common cable standards for the CSNP?

Flexibility must be retained to accommodate real-world infrastructure. Standardisation could restrict project viability; framework should remain open to non-standard designs where technically or commercially necessary and allow justified deviations from baseline standards. Many HVDC systems cross international borders requiring cable standards to be agreed with a broader set of stakeholders outside of NESO's control.

4. Would it be helpful to see the indicative offshore design before the system requirements publication? (Page 78) - Do you have any additional comments regarding the offshore design process?

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- GBIF supports early visibility of indicative offshore designs to promote transparency and enable stakeholder understanding of CSNP assumptions and real-world impacts.
- We note that there is ambiguity around the use of terms - “landing point” vs. “interface point” vs “connection point”. These should be clarified in future proposals.
- It is unclear what the limits are on the “viability” criteria for interconnector projects. There is potential for perceived subjectivity by NESO if not defined and released for review.
- GBIF recommend NESO defines electrical characteristics of partner markets in coordination with EU TSOs, not via assumptions, to ensure accuracy.
- We would like to reiterate that for interconnectors, the CSNP represents a shift away from the historic developer-led model, so cannot be reviewed or implemented in isolation. Further clarity is needed from Ofgem and DESNZ on how CSNP will interact with existing regulatory frameworks

5. Do you agree with the scope of analysis under the identify step? - Do you have any additional comments regarding the scope of analysis under the identify step? (Page 98)

- There is limited clarity on how European markets will be represented within the analysis, particularly which SSEP modelling approach, of the two consulted on, will be adopted.
- The CSNP methodology lacks sufficient detail and focus on interconnectors as a distinct technology class.

6. Do you have any feedback to improve the presentation of system requirements, as shown in the Identify chapter? (Page 98)

No response to this question.

7. What information would be useful to enable you to submit an option in the Expression of Interest window? (Page 110)

No response to this question.

8. How would you like that information to be communicated? (Page 110)

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For interconnectors, in addition to other communication routes, we request that NESO engage directly with GBIF as the industry group for interconnection to ensure that it can disseminate information to developers.

9. What additional support would you need to develop options? (Page 112)

No response to this question.

10. Do you agree with the options development process and the required information? (Page 118) - Do you have any questions regarding the options development process?

No response to this question.

11. Are there any other elements that we should include within the economic assessment? (Page 123)

- NESO is not best placed to assess all factors influencing interconnector deliverability and economic efficiency in isolation. Direct input from industry should be sought to ensure a comprehensive assessment.

12. Do you agree with our approach regarding sensitivities? (Page 124) - Are there any other specific sensitivities you think we should consider? (Page 124)

No response to this question.

13. Do you agree with the proposed scoring approach for environmental and community? (Page 129)

Neutral

14. Do you agree with the proposed flag system to highlight when an individual indicator within an impact category has reached the maximum score? (Page 130) - Do you have any additional comments on the proposed flag system?

15. Do you agree with the deliverability and operability sub-criteria listed and their scoring characteristics (Appendix C2 and C3)? (Page 137)

Neutral

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16. Are there any new criteria you believe should be included, or any existing criteria that you think could be removed? (Page 137) - Do you have any additional comments regarding the deliverability and operability sub-criteria and their scoring characteristics?

No response to this question.

17. Do you agree with our approach to the GB design decision-making framework? (Page 143) - Do you have any additional comments on the GB decision-making framework?

No response to this question.

18. Do you agree with the approach to progressing required reinforcements into the delivery pipeline? (Page 156) - Do you have any additional comments regarding the approach to processing required reinforcements into the delivery pipeline? (Page 157)

No response to this question.

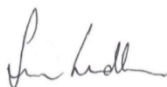
19. Do you agree with the change control process? - Do you have any additional comments on the change control process? (Page 157)

No response to this question.

20. Thank you for completing the survey. Are there any additional comments you would like to share?

None.

Yours faithfully,



Simon Ludlam
Chairperson

GB Interconnector Forum

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E-mail: chair@gbif.org.uk

