

Ofgem

By email to: RIIOElectricitytransmission@ofgem.gov.uk

22nd May 2025

Dear Ofgem,

Response to the consultation on the ASTI ODI Penalty Exemption Period request for EGL1

EDF is the largest low carbon energy generator, as well as the only nuclear generator in the UK. EDF operates low carbon nuclear power stations and has a large and growing portfolio of renewables, including onshore and offshore wind, solar and energy storage. EDF has a large customer base and will be integral to Britain achieving net zero by building a smarter energy future that will support delivery of net zero carbon emissions, including through digital innovations and new customer offerings that encourage the transition to low carbon electric transport and heating.

We welcome the opportunity to respond to this consultation on the ASTI ODI Penalty Exemption Period request for EGL1.

We recognise both the need for effective incentives on Transmission Owners to deliver transmission works to time; and the need to avoid perverse incentives on the treatment of existing connected users when completing works.

In December 2024 EDF confirmed the lifetime extension decision for Torness out to 2030, which means Torness' generation will be affected by reconfiguration works in the local area to support EGL1. We are thankful to Scottish Power Transmission for their efforts to-date in facilitating enhanced visibility of the required works and continuing to work with us to mitigate the impacts.

Substations in Scotland, including that used by Torness, for historical reasons do not have the same level of redundancy as those in England. For example, Torness' Bilateral Connection Agreement has specific outage conditions that are commercially worse than those at equivalent AGR sites in England. This position was recognised by Government and Ofgem at the point of BETTA implementation, with enhanced requirements for outage coordination with nuclear sites.

We are concerned that strong incentives on delivery only, based on a measure of wider consumer detriment, may unintentionally lead to direct financial loss on impacted system users in the area. In any assessment and decision Ofgem need to take into the specific impacts as well as the broader need for the TOs to deliver much-needed infrastructure in a timely manner.

We look forward to continuing to work with Ofgem in the post-consultation stages. Should you wish to discuss any of the issues raised in our response or have any queries, please contact me or Matthew Ball at Matthew.Ball2@edfenergy.com.

Yours sincerely,



Mark Cox, Head of Nuclear and Wholesale Market Policy