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Ref: Denny Wishaw: Consultation on Early Construction Funding and proposed modification to electricity transmission licence

This consultation response is from SP Transmission (SPT), which holds the transmission licence for south and central Scotland. SPT is part of SP Energy Networks (SPEN) and the wider Iberdrola group. We welcome the opportunity to respond to the consultation on DWNO Early Construction Funding (ECF) and proposed modification to electricity transmission licence.

We agree with minded-to position to approve ECF for the DWNO project, one of the projects included in the NESO's recommendations to meet the Government's Clean Power 2030 targets¹. This is a welcomed decision given the criticality of delivering this project to meet CP2030. The ECF will allow us to secure critical assets with long lead time as well as proceed with strategic land purchase in timely manner which will enable us to maintain current delivery programme.

We agree with the proposed modification to adjust ASTIA¹ in Appendix 1 of SpC 3.41.

Lastly, we would like to reiterate to Ofgem the importance of the diligence for the publications and would like to urge not to publish commercially confidential information. We welcome Ofgem addressing the publication of confidential information quickly, however this information may have been accessed by a number of parties prior to the update of original version of the publication.

Please do not hesitate to contact me should you wish to discuss any of the points raised within this response.

Yours sincerely



Lauren Logan

Head of Transmission Regulation & Policy

¹ <https://www.neso.energy/publications/clean-power-2030>