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Major Projects  
Ofgem

Dear Major Projects Team,

**NCAccelerated Strategic Transmission Investment:  
Material Scope Change and Early Construction  
Funding - EGL3, EGL4 and GWNC  
Closing Date 9 October 2025**

I write as someone who follows the roll out of the wind farm fleet and I am somewhat irritated by the lost power we currently suffer caused by the lack of investment and foresight in the transmission system from the north of Scotland. The publicity given to the cost of firing up gas turbines whilst at the same time wind farms are constrained is an own goal for the 'green energy revolution'. It needs to be sorted and quickly.

We have the wind farms with the highest performance locked behind poor grid connections. SHET is suffering delays in its enhancement to the grid caused by resistance to overhead line upgrades and new sub stations in Aberdeenshire, Kincardineshire and Angus. But upgrading the 275kV circuits will not be nearly enough.

The circuits in SPEN area will never get to transmit all the potential power that is available from the north without new circuits across the Central Belt of Scotland. The significant wind resources in the upper Clyde areas, the southern Western Isles and in the Borders will far exceed the potential demand in the region served by SPEN such that the region itself will have surplus power to transmit south in addition to power crossing from the north; it is therefore essential that the region be bypassed by HVDC links.

The National Grid for England needs to be capable of transmitting power from the Far North on a pass through basis to reach the Interconnectors to Europe. It is blindingly obvious that we will frequently have surplus power to sell on as the seabed areas already leased get their wind farms built out. I see that the Buchan wind farm has lodged its planning applications, that will add 1 GW of power into the Grid at Peterhead.

Spreading the transmission system to cover a wider spread of wind and solar generation is important as a matter of National Security. We ought not to rely on LNG

tankers crossing the Atlantic in the present state of security. Russia or another bad actor could disrupt the traffic and the US may not be the reliable source of LNG that we see it as now. As the price of oil falls, the profit in fracking for oil will fall too low to be economic; can we be guaranteed that gas will remain to be available?

There needs to be a means of promoting information as and when wind and solar power is switched off because supply exceeds demand. That appears to be happening for the first time this September yet the publicity has not caught up to the fact that gas fired generation is only there to support grid stability. That is not the point of this consultation but is something that needs to be borne in mind and promoted to stop the naysayers from pointing out that gas is being burnt and wind and solar power wasted.

### EGL3

The case for rapid deployment of EGL3 is easy to make. There is currently about 4 GW of on-shore wind available from wind farms north of Inverness and in an arc from Peterhead round to Fort William. Add to this the power from Viking wind farm and offshore in the Moray Firth, a further 3 GW and we can see that there will be curtailment even after the present upgrade of Eastern Green Link 2. Eastern Green Link 3 together with Eastern Green Link 2 will provide 4 GW of HVDC transmission. A further 4-5 GW might be available passing through the upgraded Scottish circuits as they are moved from 275 kV to 400 kV. This capacity is already spoken for, there are already advanced plans for the West of Orkney, Buchan and Caledonia wind farms which together will add 5 GW of peak power. The whole cluster of wind farms in the far north are strategically important to GB's power supply going forward because the weather patterns up in the far north; often they have strong winds when the rest of the country doesn't and for these reasons alone early development of EGL 3 is important. It will also allow further unknown on shore wind farms to come forward. On shore is by far the cheapest of our electricity generation and there is the potential to unlock a further 2 GW up in the far north. At what point do these additional wind farms pay for their grid connection? Seems that we should be certain that they not only make a contribution but the public should be told where and how the cost of the new links is supported.

Will bringing EGL3 forward cost domestic consumers more, and if so, how much? We can foresee that gas prices will be stable now that LNG supplies are likely to outstrip demand from mid 2026 onwards. Gas stocks in Europe are filling for the coming winter, the UK has dispensed with its Rough storage and will need to rely on regasifying LNG that is in store. Replacing gas fired electricity by cheap wind to meet the peak winter demand is essential going forward for the savings it can offer on the gas transmission system. This saving should be taken from gas charges and passed to electricity.

### EGL4

The case for EGL 4 is more complex for the bystander, not in the industry to comment on. We already see the power from SeaGreen wind farm regularly curtailed and EGL1

should help stop that, but is there scope for more on shore wind in the Central Belt of Scotland? I see that the big on shore wind farms in Lanarkshire suffer curtailment too and there is no doubt scope for additional turbines or repowering old wind farms. The newer ones have a much higher output which could provide quicker growth than might have been expected in the past. There is also power from the Western Isles that need a route to market. The Ossian wind farm promoters are beating the grid bottleneck by connecting to the Grid in Lincolnshire. That is a welcome step. How much more power will Scotland need? With many homes off the gas grid in Scotland the switch to heat pumps coupled with the growth of electric transport is unlikely to cause a big growth in demand for electricity. Scotland needs to get its wind resources to where it can be used.

Looking at demand and going forward, 2024 was the first year that demand for electricity increased after years of reduction as more efficient items arrived for both industry and our homes. By 2030 when these 2 projects might come on stream, we can expect there to be:

- 7 million electric cars
- 2.5 million heat pumps both hydronic and air to air with uptake reaching 600,000 before 2030.
- 30,000 electric HGVs as the fleet of 500,000 start to get replaced with likely 50,000 a year coming into service from 2030 onwards.
- More electric buses and coaches with them being used on longer routes between urban centres
- Increased electric rail traction, new routes and bi-mode freight locos replacing the aging diesel fleet.
- several GW of data centres
- heavy industry transformation with 2-3 EAFs and induction heating of metals for manufacturing
- Electrification of the food industry, induction cooking in food processing.

So the demand for new electricity will be there and interestingly the difference between daytime use and overnight use might become less. The Grid assets will be worked much harder throughout 24 hours of the day than they are now.

And there should be no apology for slightly overshooting grid capacity over demand. The 4 Eastern Green Links might find themselves with some spare capacity at certain times of the year but the cost could be mitigated by the income from power sold via interconnectors.

Has Ofgem/DESNZ been actively talking to the industries that use gas about their plans for electrification? Can we couple electric fired brick kilns with district heating systems?

I am not contributing to the debate on GWNC at this point.

Yours faithfully

Brian Griffiths