

# Consultation

## Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

---

Publication date: 17 March 2026

---

Response deadline: 15 April 2026

---

Contact: Irina Dihanova

---

Team: Transmission Acceleration

---

Email: [Transmission.Acceleration@ofgem.gov.uk](mailto:Transmission.Acceleration@ofgem.gov.uk)

---

We are consulting on our minded-to position on the Early Construction Funding (ECF) application submitted by Scottish Power Transmission Plc (SPT) for the Denny to Wishaw 400kV Reinforcement Project (DWNO) as governed by SPT's electricity transmission licence (the Licence), Special Condition (SpC) 3.41 'Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIR<sub>t</sub>)'. We are also consulting on our corresponding proposed modification to adjust the term ASTIA<sub>t</sub> referenced in Appendix 1 of Spc 3.41<sup>1</sup>.

We would like views from people with an interest in new transmission infrastructure, meeting the net zero challenge, and competition in onshore transmission networks. We particularly welcome responses from consumer groups, stakeholders impacted by the projects, stakeholders with an interest in the costs of electricity transmission infrastructure, and transmission owners.

This document outlines the scope, purpose, and questions of the consultation and how you can get involved. Once the consultation is closed, we will consider all responses. We want to be transparent in our consultations. We will publish the non-confidential responses we receive alongside a decision on next steps on our website at [ofgem.gov.uk/consultations](https://www.ofgem.gov.uk/consultations).

---

<sup>1</sup> [SPT Electricity Transmission Consolidated Licence Conditions](#)

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

© Crown copyright 2026

The text of this document may be reproduced (excluding logos) under and in accordance with the terms of the Open Government Licence.

Without prejudice to the generality of the terms of the Open Government Licence, the material that is reproduced must be acknowledged as Crown copyright and the document title of this document must be specified in that acknowledgement.

This publication is available at [www.ofgem.gov.uk](http://www.ofgem.gov.uk). Any enquiries regarding the use and re-use of this information resource should be sent to [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk).

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

## Contents

<b>Executive summary</b> .....	<b>4</b>
<b>1. Introduction</b> .....	<b>6</b>
Purpose of this consultation .....	6
Related publications .....	6
Consultation stages .....	7
How to respond .....	7
Your response, data, and confidentiality .....	7
How to track the progress of a consultation .....	8
<b>2. DWNO - Early Construction Funding Application Assessment</b> .....	<b>9</b>
Brief description of the project .....	9
ECF application overview .....	11
<b>3. Our Minded-to Position</b> .....	<b>17</b>
<b>4. Next steps</b> .....	<b>19</b>
<b>Send us your feedback</b> .....	<b>20</b>
<b>Appendix 1</b> .....	<b>23</b>
<b>Appendix 2. Privacy policy</b> .....	<b>30</b>

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

## Executive summary

Under Scottish Power Transmission Plc's (SPT) electricity transmission licence, Special Condition (SpC) 3.41 'Accelerated Strategic Transmission Investment Re-opener and Price Control Deliverable term (ASTIRt)' - Part C: Early Construction Funding<sup>2</sup>, Ofgem can provide Transmission Owners (TOs) with Early Construction Funding (ECF) to enable permitted early construction activities that are required to accelerate projects before an ASTI Project Assessment (PA) decision. The permitted<sup>3</sup> early construction activities are:

- Strategic land purchases
- Early enabling works
- Early procurement commitments
- Other activities approved in advance by Ofgem

In February 2026, in line with SpC 3.41.9<sup>4</sup> and the ASTI Guidance and Submission Requirements Document<sup>5</sup>, SPT submitted an application for ECF funding for the DWNO project. This is the second ECF assessment for this project and SPT has expressed confidence that the project has matured sufficiently to carry out the activities detailed in this application. Our decision on the first ECF application was published in December 2025<sup>6</sup>.

DWNO is a critical reinforcement on the Scottish transmission network, intended to increase north-to-south transfer capability across the B5 boundary, reduce constraint costs, and support delivery of the Clean Power 2030 objectives. SPT has requested additional ECF to enable strategic land purchases, early procurement of long-lead items, and early enabling works that are necessary to maintain programme momentum and facilitate timely delivery.

As part of our assessment of this ECF application, we will conduct high-level analysis of the proposed activities to ensure that they are eligible under the Licence and ASTI guidance, justified, and in the consumer's interest. We note that, at this stage, we do

---

<sup>2</sup> [Licences and licence conditions](#), Electricity licences and conditions, Transmission Licence, Scottish Power – Special Conditions

<sup>3</sup> [Decision to modify the special licence conditions in the electricity transmission licences: Accelerated Strategic Transmission Investment](#), Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document, paragraph 4.13

<sup>4</sup> [Licences and licence conditions](#), Electricity licences and conditions, Transmission Licence, Scottish Hydro Electric Transmission Plc – Special Conditions

<sup>5</sup> [Decision to modify the special licence conditions in the electricity transmission licences: Accelerated Strategic Transmission Investment](#), Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document, paragraph 3.12

<sup>6</sup> [Denny-Wishaw-Decision-on-Early-Construction-Funding.pdf](#)

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence not conduct a detailed cost assessment or take a view of the efficiency of SPT's spend. These assessments are completed at Project Assessment (PA) stage.

Our minded-to position is that the proposed activities are eligible for ECF and are, in principle, capable of delivering consumer benefit through acceleration of delivery and reduction in system constraints. We are also consulting on the amendments to the allowance set out for the project in Appendix 1 (ASTIAt) of SpC 3.41 'Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIRt)' in SPT's electricity transmission licence (the Licence) to reflect 55% of the total project cost for DWNO, as set out in SPT's licence. This represents the total sum of both ECF applications cumulatively. The term will have the value given in the corresponding updated version of the ASTI Confidential Annex. We are therefore consulting on whether ECF should be approved for DWNO and the corresponding proposed licence modification should proceed.

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

## 1. Introduction

### Section summary

This section details what this consultation is about, context and related documents.

### Purpose of this consultation

This consultation seeks views on Ofgem’s minded-to position in relation to the ECF application submitted by Scottish Power Transmission Plc for the Denny to Wishaw 400kV Reinforcement Project (DWNO). It also seeks views on the proposed modification to Appendix 1 of Special Condition 3.41 of SPT’s electricity transmission licence to reflect the provision of ECF.

We have provided a brief description of the project and the proposed activities SPT intends to carry out in Chapter 2. Respondents are asked to consider whether these activities are in consumers’ interest and support timely delivery of strategic infrastructure. We summarise our view on the ECF application and set out our minded-to decision. Our consultation questions are:

- Q1: Do you agree with our minded-to position to provide ECF for the SPT DWNO project?
- Q2: Do you agree with our proposed modification to adjust ASTIA<sub>t</sub> in Appendix 1 of SpC 3.41?

We note that the purpose of ECF is to enable permitted early construction activities prior to the project receiving planning consents and being finalised. We are not involved in any planning decisions and the award of ECF should not influence the outcome of the relevant planning processes. We encourage stakeholders to engage directly with the planning process, as this remains the most appropriate place to voice any comments on project design or scope.

### Related publications

Denny Wishaw: Consultation on Early Construction Funding: [DWNO ECF Consultation](#)

Denny Wishaw – Decision on Early Construction Funding: [Denny-Wishaw-Decision-on-Early-Construction-Funding.pdf](#)

Decision on accelerating onshore electricity transmission investment: [Ofgem.gov.uk/publications/decision-accelerating-onshore-electricity-transmission-investment](#)

Decision to modify the special licence conditions in the electricity transmission licences and corresponding Associated Document: Accelerated Strategic Transmission Investment, Accelerated Strategic Transmission Investment Guidance And Submission Requirements Document: [Ofgem.gov.uk/publications/decision-modify-special-](#)

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence [licence-conditions-electricity-transmission-licences-accelerated-strategic-transmission-investment](#)

## Consultation stages

**Stage 1** Consultation open: 17 March 2026

**Stage 2** Consultation closes (awaiting decision). Deadline for responses: 15 April 2026

**Stage 3** Responses reviewed and published: June 2026

**Stage 4** Consultation outcome (decision or policy statement): June 2026

## How to respond

We want to hear from anyone interested in this consultation. Please send your response to the person or team named on the front page of this document.

We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website.

## Your response, data, and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information. For example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations, or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the United Kingdom's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 1.

If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

## **How to track the progress of a consultation**

1. Find the web page for the call for input you would like to receive updates on.
2. Click 'Get emails about this page', enter your email address and click 'Submit'.
3. You will receive an email to notify you when it has changed status.

A consultation has three stages: 'Open', 'Closed (awaiting decision)', and 'Closed (with decision)'.

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

## 2. DWNO - Early Construction Funding Application Assessment

### Section summary

This chapter sets out SPT's ECF application and our minded-to position.

#### Questions

- Q1. Do you agree with our minded-to position to provide ECF for the SPT DWNO project?
- Q2. Do you agree with our proposed modification to adjust ASTIA<sub>t</sub> in Appendix 1 of SpC 3.41?

### Brief description of the project

- 2.1 As Scotland and the United Kingdom move toward a Clean Power and Net Zero future, there is an increasing need for power transfer from north to south and a need for significant transmission reinforcement within SPT's network boundaries. DWNO will allow an additional 1,000MW of green energy to flow through Scotland's central belt<sup>7</sup>.
- 2.2 DWNO has been approved for inclusion in our ASTI framework because it is crucial for the safe, resilient, and efficient transmission of electricity through the energy system. According to SPT, DWNO is one of its most strategically important projects from its onshore portfolio.
- 2.3 The proposed solution with DWNO will reduce boundary constraints across the B5 boundary. The NESO 2025 Constraint Cost Report<sup>8</sup> highlights that the principal B5 constraint incurred £96.4m in costs between April 2024 and March 2025, with a further £4.4m recorded between April and September 2025. The circuits identified for upgrade within the DWNO programme are some of the circuits most frequently restricted across the B5 boundary and are therefore primary drivers of these costs.
- 2.4 DWNO will establish a new north-to-south double circuit overhead line route through the Scottish Central Belt, with one circuit operating at 400kV and the other at 275kV, alongside associated substation works, uprating and refurbishment of existing assets.
- 2.5 DWNO consists of:

---

<sup>7</sup> [Denny to Wishaw Network Upgrade - SP Energy Networks](#)

<sup>8</sup> [Constraint Breakdown Costs and Volume | National Energy System Operator](#)

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

- A new north–south double-circuit overhead line corridor through the Scottish Central Belt, with one circuit operating at 400kV and the other at 275kV, providing additional transfer capability across the B5 boundary.
- 400kV overhead line between Bonnybridge and an existing overhead line north of Glenmavis.
- Extension and reinforcement of existing substations along the route, including works at Wishaw and Bonnybridge to support 400kV operation.
- Reconductoring and uprating of existing overhead line routes between Easterhouse, Newarthill and Wishaw.

2.6 In January 2022, National Grid Electricity System Operator (NGESO<sup>9</sup>) as part of the Network Options Assessment (NOA) highlighted DWNO as a ‘Required for 2028’ project due to the new 400kV double circuit from Bonnybridge to Newarthill and recommended to proceed in the associated NOA7 Refresh published in July 2022<sup>10</sup>.

2.7 Additionally, the project provides material protection against the expected escalation of constraint costs later this decade. Independent system analysis indicates that, even with planned transmission reinforcements, GB constraint volumes and associated consumer costs are forecast to rise through the late 2020s as renewable generation increases and spatial mismatches between supply and demand intensify<sup>11</sup>. Accelerating delivery of DWNO therefore aims to contribute to the growing future cost burden that would otherwise be borne by the consumer.

2.8 Since the original inclusion of the project in ASTI, SPT has updated the cost estimate of the project. SPT attributes the increase from the original licence cost to the following:

- Changes in market prices since original assumptions, including supply-chain constraints that have resulted in increased unit rates.
- Design evolution and increased design maturity, which has identified a more optimised solution that incorporates modern technologies, allows greater future capacity and can be more efficient in the longer term.
- Changes arising from overhead line routing and engagement with local communities prior to the consenting process.

---

<sup>9</sup> NGESO refers to the former National Grid-owned electricity system operator; NESO is its successor, established in October 2024 as a publicly owned, independent energy system operator with wider electricity and gas planning responsibilities

<sup>10</sup> [NOA Refresh 2021-22](#)

<sup>11</sup> [Constraint Management Report - Exec Summary original](#)

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

- Revised substation layouts and ratings, which have also led to increased land requirements.
- The inclusion of additional works to accelerate delivery and reduce risk., e.g. the proposal for an offline build<sup>12</sup> of the 400kV substation at Bonnybridge which will enable a significantly faster switch-over and would reduce project timescales by approximately 6–9 months.

2.9 SPT has engaged with Ofgem to explain the rationale behind the additional works that have resulted in higher total project cost estimates. The efficiency of these costs will be tested at Project Assessment (PA) stage and is not within the scope of this consultation. Our engineering teams have had initial conversations with SPT to discuss the detailed solutions proposed but they have not completed a detailed Technical Assessment for this project at the time of this consultation.

2.10 At the early stages of engagement, Ofgem’s engineering team has not raised immediate concerns with the updated solution, but we defer full judgement to the technical assessment, which will be completed ahead of the PA.

2.11 This consultation covers the second application for ECF for the DWNO project by SPT. Our decision to approve 15% was published in December 2025<sup>13</sup>. As stated in the decision for SPT’s first ECF request, SPT indicated that it would submit an additional ECF request for the DWNO project in early 2026. We are satisfied that the activities requested in the second submission are a continuation from the activities of SPT’s first ECF application and reflect that the project has advanced further, and that SPT has identified more opportunities to accelerate and minimise delivery risk. We will undertake a full cost assessment, including of all ECF costs, at the ASTI PA stage.

2.12 SPT assess the risk of the project being cancelled as “extremely low”. The reinforcement is identified as necessary for CP2030, and SPT is proactively engaging with the appropriate bodies to ensure that it is able to secure the necessary consents to deliver the project. We note the consenting process is ongoing with final consenting decisions expected in 2027. Ofgem’s decisions are fully independent and do not predetermine the outcome of the planning process.

## **ECF application overview**

2.13 In February 2026 SPT applied for ECF to support a programme of early activities prior to PA. These activities fall within the categories permitted under SpC 3.41, namely strategic land purchases, early procurement commitments, and early enabling works.

---

<sup>12</sup> “Offline build” refers to building new equipment separately from the existing system, then connecting it once finished so disruption is kept to a minimum.

<sup>13</sup> [Denny-Wishaw-Decision-on-Early-Construction-Funding.pdf](#)

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

2.14 The application reflects the need to secure long-lead equipment, undertake preparatory works within existing sites, and acquire land required to enable efficient construction and reduce delivery risk. SPT has indicated that without ECF, the project would be exposed to delays and increased costs, with adverse impacts on consumers through prolonged system constraints.

2.15 SPT’s application is for 55% of the DWNO project’s forecast costs as set out in SPT’s licence. We note that the value of the request equals 24% when based on the updated project cost estimate that SPT has shared with us as part of this application.

2.16 In our ASTI Guidance, we explained that we will consider approving ECF in excess of the 20% cap in exceptional circumstances where expenditure is justified and necessary, and where we are satisfied the consumer benefit of providing additional allowances outweighs the increased risk to consumers should the project not ultimately secure planning permission. We must be confident there are sufficient consumer protections in place to minimise consumer exposure to financial loss in the unlikely event of project cancellation.<sup>14</sup>

	<b>Requested % against the licence</b>	<b>Requested % against updated costs</b>
<b>ECF1</b>	15	7
<b>ECF2</b>	40	17
<b>Cumulative</b>	55	24

*Table 1: requested ECF percentage*

2.17 SPT has explained that this ECF application exceeds the maximum ECF allowance of 20% project cost as set out in its licence for the following reasons:

- An industry-wide increase in cost along with wholesale increase in supply-chain costs since the original inclusion of the project in the ASTI framework means that the cost likely to be incurred at ECF stage is greater than anticipated.
- Changes in the original scope of the project to include infrastructure enhancements that create greater capacity require additional construction works and procurement of more materials at early stages.
- Accelerated delivery of the project makes it necessary to incur certain costs earlier due to longer lead time items and constraints in the supply chain.

---

<sup>14</sup> [ASTI Guidance](#), para 4.8

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

2.18 As per the ASTI Guidance, we expect projects that exceed the 20% ECF cap to detail why the activities proposed are in consumers' interest when balanced against the risk of the project not proceeding and how these activities might accelerate delivery.

2.19 TOs must evidence and substantiate the costs within their submission as described in the ASTI Guidance. SPT has provided this evidence to inform our assessment.

2.20 The ECF funding is intended to allow TOs to carry out early construction activities where it is in consumers' interest for these costs to be incurred early and can help to accelerate the delivery of the project.

### **Strategic land purchase**

2.21 Strategic land purchases in ECF1 were limited and the full land requirements were not funded. Additional land is required at Cumbernauld, Wishaw and Bonnybridge substations to allow the extension of these sites.

2.22 Strategic Land Purchase Activities:

- King's and Lord Treasurer's Remembrancer (KLTR) land: additional land is required to complete the overhead line conducting which are located on land owned by the Crown.
- Bonnybridge: additional land is required to allow the connection of the new overhead line route at 400kV. This approach allows the uplift to the B5 boundary capacity at an earlier point than would otherwise be the case and also minimises outage time at the site.
- Cumbernauld: the purchase of land is required to allow the siting of a new 275/33kV Supergrid Transformer and associated plant.
- Wishaw: additional land is required to connect the new 400kV circuit from the updated XR Route to the 400kV GIS Substation.
- Compounds / Working Areas.

2.23 The land rights acquisition process for the project involves over 200 interested parties, including tenants and homeowners, making voluntary agreements impractical and necessitating a compulsory purchase order (CPO) process. SPT is actively engaging with the interested parties to explain the CPO process.

### *Consumer benefits and protections in place*

2.24 Purchasing the land at this stage helps to avoid costly delays to the project as it would be readily available to begin construction as soon as consents are in place and would avoid the need to re-design the project if the land was no longer available later.

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

2.25 Purchasing the land at this stage can help avoid paying higher cost for the land if prices increase over time, ultimately saving the consumer money.

2.26 SPT has confirmed that, if the project is cancelled, any land purchased could be resold with unspent money returned to the consumer. Some of the costs associated with land purchase would not be recoverable as they include non-refundable fees. The market value may also fluctuate, therefore the value at which it could be sold is not guaranteed.

2.27 Early land purchases can help manage consenting and landowner risks earlier in the process, which could subsequently prevent delays to construction and/or critical path activities.

### **Early enabling works**

2.28 While some of the activities requested here were detailed in the decision for ECF1, SPT has confirmed that this updated ECF request is for payments required prior to the project receiving its PA decision. This request does not represent a duplication of funding. This will be fully tested at PA cost analysis stage.

2.29 SPT proposes to carry out some early enabling works both to make use of existing outages already planned on the system and to facilitate other works associated with connections activities. ECF is required to facilitate:

- **Cumbernauld Substation Platform Extension:** SPT will begin works to extend and uprate Cumbernauld 132kV GSP to 275kV, including construction of the new extension platform.
- **Substation works within existing sites:** these are required to connect the new DWNO circuits into the live network, increase corridor capacity, accommodate uprated overhead lines, facilitate customer connections, align works with planned outages, and deliver asset health and system operability improvements.
- **SPD Diversion Works and Scottish Water Diversion Works:** required to divert a 30" Scottish Water main. These works are required to remove physical and operational constraints created by existing third-party utility assets that conflict with the proposed project design. Without these diversions, key elements of the DWNO scope could not proceed, or would be subject to unacceptable safety, programme, and cost risk.
- **EPC Design Activities:** SPT has stated the project has moved beyond high-level concept design into detailed, construction-ready design that must be undertaken early to maintain programme pace and manage risk.

*Consumer benefits and protections in place*

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

- 2.30 SPT has informed us that several of the activities being proposed in this category are deemed 'No Regret' works. This means even if the project were to be cancelled, they would be required for asset-health purposes, to facilitate system improvements independently of the DWNO project, or to facilitate customer connection works at various sites. The value for almost half of the activities in this category is therefore not likely to be at risk.
- 2.31 XX and XR routes are required to be re-conducted for asset-health reasons in the RIIO-T3 period in any case. All associated surveys and design works with this would still be required even in the event of project cancellation.
- 2.32 SPT has explained that the works associated with converting the Strathaven-Torness 400kV circuit to Wishaw (including the associated GIS bays and Bus Section CB) is no regret spend for the consumer as it will ensure that power flows from east to west within that section of the SPT system to keep it balanced. The design work activity within this application could be repurposed to deliver a similar outcome and avoid unrecoverable costs for the consumer in the event of project cancellation.
- 2.33 The installation of a Line Circuit Breaker and the replacement of gantries at Easterhouse will reduce circuit complexity in this area and facilitate a customer connection that has consents already granted. SPT has confirmed that all design works associated with this element are not likely to be redundant in any scenario.
- 2.34 The reconfiguration of Newarthill 275kV Substation will facilitate future connections activities at this site. The replacement of the existing Current Transformers and Disconnectors will also allow a higher power flow along the OHL corridor between Easterhouse and Wishaw. SPT has confirmed that all design works can be repurposed if necessary.
- 2.35 SPT has also stated that a proportion of the project's EPC design work could be reused on other schemes, further reducing any potential sunk costs. While not all design elements are transferable, several can be repurposed to support future projects, providing an additional safeguard for consumers.

### **Early procurement commitments**

- 2.36 We recognise that much of the procured items were also listed in ECF1. It is important to note that ECF is not expected to cover the full purchase of assets and ECF1 allowed SPT to place or initiate contracts for the most critical long-lead items, the requested activities below are a continuation and expansion of the same procurement activity and necessary to carry out procurement payments through to PA stage.
- 2.37 SPT require ECF to place purchase orders for the following plant and equipment to allow progression of site works at the earliest points possible. ECF is required to facilitate:

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

- GIS and GIB: Three bays of Gas Insulated Switchgear and a Bus Section Circuit Breaker for the extension of the 400kV Wishaw substation.
- Super grid Transformers: Two 400/132kV 360MVA Supergrid Transformers to facilitate the uprating of Bonnybridge 275kV substation to 400kV. Two 275/33kV 90MVA Supergrid Transformers to facilitate the uprating of Cumbernauld 132kV S/S to 275kV.
- Long-Lead Equipment (Air Insulated Switchgear and Protection and Control equipment): Required to deliver essential substation extensions and reconfigurations within existing sites and avoid costly delays to the project.
- OHL Conductor and Accessories: Needed to reconductor and uprate existing overhead line routes and construct new sections of line, increasing thermal capacity, addressing asset health drivers, and enabling higher north–south power transfers across B5.
- Underground Cable: 132kV Underground Cable (UGC) for AA Route undergrounding works and within Bonnybridge 400kV Substation.

*Consumer benefits and protections in place*

- 2.38 To protect consumers from unrecoverable spend in the unlikely event of project cancellation, SPT has provided assurances of protections in place such as milestone payments and asset transferability. Milestone payments can help limit the amount of risk that the consumer is exposed to - loss would only be incurred for the milestone payment already committed at the time of cancellation.
- 2.39 In the event of project cancellation, if GIS equipment in the works required for Torness – Strathaven 400kV circuit was no longer required, SPT can use these bays for future strategic connection opportunities. This means that the value can be transferred to a future project and the investment is unlikely to incur a loss.
- 2.40 Similarly, if Supergrid Transformer orders for Bonnybridge and Cumbernauld could not be cancelled, depending on the stage of the procurement process, at which the cancellation occurs, the transformers could be used for either customer connection works or for condition driven (non-load) transformer replacement projects.
- 2.41 The 132kV UGC for AA Route undergrounding works and within Bonnybridge 400kV Substation is standard equipment and SPT is confident that the item could be utilised on another project.
- 2.42 Procurement of long-lead equipment is required to secure manufacturing capacity within a constrained supply-chain. Global competition for high voltage equipment, including GIS, transformers and conductors, has led to increases in both cost and lead times of critical transmission components. Failure to secure manufacturing slots early could expose consumers to higher prices, delayed

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence delivery, and increased constraint costs. Early procurement enabled by ECF therefore delivers direct consumer value by mitigating the risk of price escalation and preventing potential delays driven by global supply chain constraints.

- 2.43 SPT also considers several of the activities being proposed in this category ‘No Regret’ works. SPT has confirmed that all long-lead items associated with reconductoring of OHL, Wishaw circuit, line circuit breaker, replacement of gantries, reconfiguration of Newarthill Substation and the replacement of the existing Current Transformers and Disconnectors can be repurposed among relevant SPT projects, as detailed above. This means that the funding for these items is unlikely to be awarded at risk to the consumer.
- 2.44 The ability to repurpose long lead items materially reduces consumer exposure to wasted spend, meaning early procurement represents a balanced and proportionate approach that is in consumers’ interests.

### 3. Our Minded-to Position

- 3.1 We have engaged with SPT extensively on the project and we are satisfied that the activities set out in SPT’s ECF request are justified and eligible to be funded under SpC 3.41 as early construction funding and that SPT has provided us with sufficient evidence to substantiate the claims.
- 3.2 The activities will help accelerate the delivery of the DWNO project, minimise delivery risk and provide opportunities to secure better value for the items and services procured early. This will also support the government’s Clean Power 2030 targets and deliver the benefits described in both NOA and NESO’s Clean Power 2030 Action Plan.
- 3.3 In accordance with our ASTI Decision, and as explained in the ASTI guidance, we can consider ECF requests above 20% of total forecast project costs in exceptional circumstances where the expenditure is justified and necessary to accelerate project delivery, or where not investing will increase the risk of project delay<sup>15</sup>. We must also be confident that there are sufficient consumer protections in place for each activity to minimise consumer exposure to financial loss in the event of project cancellation.
- 3.4 Delivering the project on time will reduce boundary constraints across the B5 boundary. Additionally, the project provides material protection against the expected escalation of constraint costs later this decade. Accelerating delivery of DWNO therefore will help alleviate constraint costs that would otherwise be borne by the consumer. Not investing in the activities proposed could result in the project missing its target delivery date, which will come at a cost to the consumer.

---

<sup>15</sup> as per paragraph 4.8 of the ASTI Guidance

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

- 3.5 SPT has provided us with details on the activities considered ‘no regret’ in both early enabling works category and the early procurement category. These include reconductoring of OHL and the reconfiguration of Newarthill Substation, and we are satisfied that these materially reduce consumer exposure to wasted spend.
- 3.6 We recognise the benefits of early procurement of long-lead time items and are satisfied by SPT’s assurances that a proportion of these are standard items that can be repurposed to other projects, further reducing consumer risk.
- 3.7 We acknowledge that there are benefits to carrying out the activities in each category. We are satisfied that SPT has placed sufficient consumer protections in place to limit the exposure to financial loss in the event of project cancellation.
- 3.8 Rejecting the ECF request would materially increase the risk of delivery delay by preventing early procurement, enabling works and land acquisition, with knock-on impacts on outages, supply-chain access and boundary constraint costs. In this context, it is proportionate to accept limited additional early-stage risk, given the project’s strategic importance, low cancellation risk, contractual safeguards and the ability to repurpose assets, in order to avoid higher costs and wider system impacts.
- 3.9 We are therefore minded-to approve the ECF funding for the DWNO project up to 55% of licence cost, which corresponds to 24% of the updated project forecast cost. This represents the cumulative total for both ECF requests.
- 3.10 We acknowledge that this is above the 20% threshold but we consider that delays to the project represent a greater and more certain risk to consumers than early investment in strategically critical assets. Constraint costs are incurred continuously and cannot be recovered, whereas ECF is subject to contractual protections, asset re-use, and resale value detailed in this document. In this context, approving additional ECF for DWNO represents a net reduction in consumer risk when assessed over the system lifecycle.
- 3.11 It is Ofgem’s view that this strikes a fair balance between protecting the consumer from excessive risk, while still promoting acceleration of the project and providing a safe, clean and stable energy network, which is ultimately in the consumer’s interest.
- 3.12 We expect SPT to take all reasonable steps to ensure timely and successful delivery of the project and to ensure that consumer risks in every scenario are kept as low as practical.

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

## 4. Next steps

### Section summary

This chapter sets out the next steps in our assessment under the ASTI framework.

- 4.1 Our consultation on the positions set out in this document will close on 15 April 2026.
- 4.2 We aim to publish our ECF decision in summer 2026 and, subject to the outcome of the consultation, this will be alongside the decision to modify SPT's licence in accordance with section 11A of the Electricity Act 1989.
- 4.3 The proposed modifications to Appendix 1 of SpC 3.41 are set out in the accompanying document to this consultation.

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

## Send us your feedback

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this consultation. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Do you have any further comments?

Please send your feedback to [stakeholders@ofgem.gov.uk](mailto:stakeholders@ofgem.gov.uk).

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

## **Annex I: Notice of statutory consultation to modify SpC**

### **3.41**

To: Scottish Power Electricity Transmission Plc

#### **Electricity Act 1989**

#### **Section 11A (2)**

#### **Notice of statutory consultation on a proposal to modify the Special Conditions of the electricity transmission licence held by Scottish Power Electricity Transmission Plc**

1. The Gas and Electricity Markets Authority ('the Authority') proposes to modify the Special Conditions (SpC) of the electricity transmission licence held by Scottish Power Electricity Transmission Plc (SPT) granted or treated as granted under 6(1)(b) of the Electricity Act 1989 by amending an allowance value (ASTIA<sub>t</sub>) referenced in Appendix 1 (ASTI Price Control Deliverable) of SpC 3.41 (Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIR<sub>t</sub>)).
2. As per Special Condition 3.41.8, the Authority hereby directs that the licence limitation for the ECF to not exceed 20% of the total forecast project cost listed in the ASTI Confidential Annex for the Denny to Wishaw (DWNO) project is not applicable for the reasons given in the licence modification decision.
3. In line with SpC 3.41.10 and the Accelerated Strategic Investment Guidance and Submission Requirements Document, we are proposing this modification because we are satisfied that SPT's Early Construction Funding (ECF) application for the Denny to Wishaw (DWNO) project:
  - a. has provided clear and convincing justification for exceeding the 20% threshold of total forecasted project costs as set by SpC 3.41.8 and has demonstrated the appropriate balance between assisting acceleration and protecting consumers from potentially excessive cost exposure in the unlikely event that the projects do not progress;
  - b. was pre-empted by a notice in writing of SPT's intention to make the application under section 3.41.7 at least 8 weeks before SPT made the application; and
  - c. there is a clear justification for why it is in consumer's interests to provide funding for the proposed activities to take place ahead of our cost assessment as part of the Project Assessment process as the early construction activities will aid in accelerating project delivery.

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

4. The effect of the proposed modification is to adjust the allowances contained in the ASTI Confidential Annex as referenced in Appendix 1 (ASTIAt) of Special Condition 3.41 ‘Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIAt)’ and to insert “ECF” into the “ECF/PA” column for DWNO in Appendix 1 to SpC 3.41 in SPT’s electricity transmission licence to allow SPT’s ECF expenditure application. The proposed modification will be reflected in what will become the latest version, v1.1, of the ASTI Confidential Annex.
5. With the exception of the ASTI Confidential Annex, a copy of the proposed modification and other documents referred to in this Notice have been published on our website ([www.ofgem.gov.uk](http://www.ofgem.gov.uk)). Alternatively, they are available from [information.rights@ofgem.gov.uk](mailto:information.rights@ofgem.gov.uk).
6. The full text of the proposed modification to Appendix 1 of SpC 3.41 is set out below in Appendix 2 with the new text to be inserted shown double underscored. For reasons of commercial sensitivity, details of the amended allowance are confidential but will be issued to SPT in the updated ASTI Confidential Annex.
7. Any representations with respect to the proposed licence modification must be made on or before 15 April 2026 to: Thomas Johns, Office of Gas and Electricity Markets, 32 Albion Street, Glasgow, G1 1LH or by email to [Transmission.Acceleration@ofgem.gov.uk](mailto:Transmission.Acceleration@ofgem.gov.uk) and marked for the attention of Thomas Johns.
8. We normally publish all responses on our website. However, if you do not wish your response to be made public then please clearly mark it as not for publication. We prefer to receive responses in an electronic form so they can be placed easily on our website.
9. If we decide to make the proposed modification, it will take effect not less than 56 days after the decision to modify the licence is published.

.....

**Thomas Johns**

**Deputy Director of Major Projects Delivery**

**Duly authorised on behalf of the Gas and Electricity Markets Authority**

**17 March 2026**

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

## Annex 2: Special Condition 3.41 Accelerated strategic transmission investment Re-opener and Price Control Deliverable term (ASTIR<sub>t</sub>)

### Introduction

3.41.1 The purpose of this condition is to specify the value of the term ASTIR<sub>t</sub> (the accelerated strategic transmission investment Re-opener term). This contributes to the calculation of the Totex Allowance.

3.41.2 The effect of this condition is to:

(a) specify the ASTI Outputs, delivery dates and allowances for the Price Control Deliverable;

(b) establish a Re-opener for the licensee to apply for an adjustment to the ASTI Outputs, delivery dates and allowances in Appendix 1 and the Minimum circuit availability standard after delivery in Appendix 2;

(c) provide for an assessment of the Price Control Deliverable; and

(d) establish the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document.

3.41.3 This condition also sets out the process the Authority will follow when making changes to Appendix 1 as a result of the Re-opener.

### Part A: Formula for calculating the accelerated strategic transmission investment Re-opener term (ASTIR<sub>t</sub>)

3.41.4 The value of ASTIR<sub>t</sub> is derived in accordance with the following formula:

$$ASTIR_t = ASTIA_t - ASTIRA_t$$

where:

*ASTIA<sub>t</sub>* means the allowances in Appendix 1; and

*ASTIRA<sub>t</sub>* has the value zero unless otherwise directed by the Authority in accordance with Part G.

### Part B: ASTI Outputs

3.41.5 The licensee must deliver the ASTI Outputs no later than 12 months after the delivery dates specified in Appendix 1.

3.41.6 After the ASTI Output has been delivered it must be operational and available for use by the ISOP for the period specified in Appendix 2 after application of the exclusions set out in Chapter 4 of the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document.

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

**Part C: Early Construction Funding**

- 3.41.7 The licensee may, in respect of any ASTI Output, apply for an Early Construction Funding decision to adjust ASTIA<sub>t</sub>.
- 3.41.8 Unless the Authority directs otherwise, the aggregate allowances provided under paragraph 3.41.7 for any ASTI Output may not exceed 20% of the total forecast project cost listed in the ASTI Confidential Annex.
- 3.41.9 The licensee must notify the Authority in writing of its intention to make an application under 3.41.7 at least 8 weeks before making an application, unless the Authority directs otherwise.
- 3.41.10 A modification under this Part will be made under section 11A of the Act.

**Part D: ASTI Project Assessment Decision**

- 3.41.11 The licensee may, in respect of any ASTI, apply for an ASTI Project Assessment Decision and an associated modification of Appendices 1 and 2 to:
- (a) specify or amend an ASTI Output, a delivery date and associated allowances; and
  - (b) specify the minimum circuit availability standard after delivery for the relevant ASTI Output.
- 3.41.12 Unless the Authority otherwise directs, the licensee may only apply for an ASTI Project Assessment Decision after submission of all material planning consent applications.
- 3.41.13 A modification under this Part will be made under section 11A of the Act.

**Part E: ASTI Cost And Output Adjusting Event**

- 3.41.14 The licensee may apply for a modification to the ASTI Outputs and allowances in Appendix 1 where it considers that there has been one or more ASTI Cost And Output Adjusting Event.
- 3.41.15 The licensee may only apply under this Part to modify allowances in Appendix 1 where:
- (a) expenditure has been caused to increase or decrease by at least the percentage specified in, or in accordance with, paragraph 3.41.17, calculated before the application of the Totex Incentive Strength, relative to the relevant allowance in Appendix 1 by the event or if there has been more than one event:
    - i. by each event;
    - ii. if the Authority has directed that the events in relation to the relevant ASTI Output should count cumulatively towards the percentage threshold,; and

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

- (b) the increase or decrease in expenditure is expected to be efficiently incurred or saved.
- 3.41.16 The licensee may apply under this Part to modify the ASTI Outputs in Appendix 1 only where there is a material change to the scope of the relevant ASTI project.
- 3.41.17 The percentage referred to in paragraph 3.41.15(a) is:
- (a) 5%; or
  - (b) such other percentage as the Authority may specify by direction.
- 3.41.18 An application under this Part must be made in writing and must:
- (a) include detailed supporting evidence that an ASTI Cost And Output Adjusting Event meeting the requirements set out in paragraphs 3.41.15, or where applicable 3.41.16, has occurred;
  - (b) set out the modifications requested to the ASTI Outputs or associated allowances in Appendix 1;
  - (c) explain the basis of the calculation for any proposed modification to the allowances in Appendix 1, which must be designed to keep, so far as is reasonably practicable, the financial position and performance of the licensee the same as if the ASTI Cost And Output Adjusting Event had not occurred; and
  - (d) include a statement from a technical adviser, who is external to and independent from the licensee, whether, considered in the context of the value of the ASTI Output, the proposed modification to the ASTI Output or associated allowances fairly reflects the effects of the ASTI Cost And Output Adjusting Event.
- 3.41.19 The Authority may make a modification under this Part where:
- (a) there has been an application under this Part;
  - (b) there has been an ASTI Cost And Output Adjusting Event in relation to the relevant ASTI;
  - (c) the requirements of paragraphs 3.41.14 to 3.41.18, where applicable, have been met; and
  - (d) the proposed modifications to Appendix 1 have the effect so far as is reasonably practicable of keeping the financial position and performance of the licensee the same as if the ASTI Cost And Output Adjusting Event had not occurred.
- 3.41.20 A modification under this Part will be made under section 11A of the Act.

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

**Part F: Modification of delivery date in Appendix 1 further to an ASTI ODI Penalty Exemption Period decision or ASTI ODI Target Date decision under Part B of Special Condition 4.9 (Accelerated strategic transmission investment output delivery incentive)**

3.41.21 The Authority will modify the delivery dates in Appendix 1 where it decides under Part B of Special Condition 4.9 (Accelerated strategic transmission investment output delivery incentive) to make a modification to the ASTI ODI Penalty Exemption Period or ASTI ODI Target Date in Appendix 1 of Special Condition 4.9.

3.41.22 A modification under this Part will be made under section 11A of the Act.

**Part G: Assessment of the Price Control Deliverable (ASTIR<sub>t</sub>)**

3.41.23 The Authority will, in accordance with the assessment principles set out in Part A of Special Condition 9.3 (Price Control Deliverable assessment principles and reporting requirements), consider directing a value for ASTIR<sub>t</sub> where the licensee has not Fully Delivered an output in Appendix 1.

**Part H: What process will the Authority follow in making a direction?**

3.41.24 Before making a direction under Part G the Authority will publish on the Authority's Website:

- (a) the text of the proposed direction;
- (b) the reasons for the proposed direction; and
- (c) a period during which representations may be made on the proposed direction, which will not be less than 28 days.

3.41.25 A direction in respect of Part G will set out:

- (a) the delivery status of the ASTI Output that has not been Fully Delivered;
- (b) the value of the ASTIR<sub>t</sub> term and the Regulatory Years to which that adjustment relates; and
- (c) the methodology and data that has been used to decide the delivery status and value of any adjustments to the ASTIR<sub>t</sub> term.

**Part I: Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document**

3.41.26 The licensee must comply with the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document.

3.41.27 The Authority will issue and amend the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document by direction.

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

3.41.28 The Authority will publish the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document on the Authority's Website.

3.41.29 The Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document will make provision about the detailed requirements for Parts C, D, E and F.

3.41.30 The Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document will also make provision about the detailed requirements under Special Condition 3.40 (ASTI Pre-Construction Funding Re-opener, Price Control Deliverable and Use It Or Lose It Adjustment) and Special Condition 4.9 (ASTI output delivery incentive).

3.41.31 Before directing that the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document comes into effect, the Authority will publish on the Authority's Website:

- (a) the text of the proposed Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document;
- (b) the date on which the Authority intends the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document to come into effect; and
- (c) a period during which representations may be made on the text of the proposed Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document, which will not be less than 28 days.

3.41.32 Before directing an amendment to the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document, the Authority will publish on the Authority's Website:

- (a) the text of the amended Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document;
- (b) the date on which the Authority intends the amended Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document to come into effect;
- (c) the reasons for the amendments to the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document; and
- (d) a period during which representations may be made on the amendments to the Accelerated Strategic Transmission Investment Guidance and Submissions Requirements Document, which will not be less than 28 days.

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

### Appendix 1

#### ASTI Price Control Deliverable

ASTI Output	Delivery Date	Allowance (ASTIA <sub>t</sub> , £m)	ECF/PA
Denny to Wishaw 400 kV reinforcement (NOA Code: DWNO)	31 December 2029	Have the values given in the ASTI Confidential Annex.	ECF
Eastern subsea HVDC link from Torness to Hawthorn Pit (NOA Code: E2DC)	31 December 2028	Have the values given in the ASTI Confidential Annex.	PA
Eastern subsea HVDC Link from east Scotland to south Humber area (NOA Code: TGDC)	31 December 2031	Have the values given in the ASTI Confidential Annex.	ECF
East Coast Onshore 400 kV Phase 2 reinforcement (NOA Code: TKUP)	31 December 2031	Have the values given in the ASTI Confidential Annex.	ECF

### Appendix 2

#### ASTI Output availability standard

ASTI Output	Minimum circuit availability standard after delivery (%)		
	0-6 months	6-12 months	12-24 months
Denny to Wishaw 400 kV reinforcement (NOA Code: DWNO)			
Eastern subsea HVDC link from Torness to Hawthorn Pit (NOA Code: E2DC)			
Eastern subsea HVDC Link from east Scotland to south Humber area (NOA Code: TGDC)			
East Coast Onshore 400 kV Phase 2 reinforcement (NOA Code: TKUP)			

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

## Appendix 1: Privacy policy

### Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

#### **1. The identity of the controller and contact details of our Data Protection Officer**

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at [dpo@ofgem.gov.uk](mailto:dpo@ofgem.gov.uk)

#### **2. Why we are collecting your personal data**

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

#### **3. Our legal basis for processing your personal data**

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

#### **4. For how long we will keep your personal data, or criteria used to determine the retention period.**

Your personal data will be held for six months after the project is closed.

#### **5. Your rights**

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3<sup>rd</sup> parties

**Consultation** Denny to Wishaw 400kV Reinforcement Project (DWNO) Statutory consultation on Early Construction Funding (ECF) and corresponding proposed modification to Special Condition 3.41 of their electricity transmission licence

- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

**7. Your personal data will not be sent overseas**

**8. Your personal data will not be used for any automated decision making.**

**9. Your personal data will be stored in a secure government IT system.**

**10. More information** For more information on how Ofgem processes your data, click on the link to our “[ofgem privacy promise](#)”.