

Ocean Winds (UK) Limited

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Ofgem

Attn: Irina Dihanova / Transmission Acceleration Team

Electricity Connections Policy Development

Delivered to: Transmission.Acceleration@ofgem.gov.uk

10 April 2026

Ocean Winds' response to Statutory Consultation on eight SHET Early Construction Funding applications and corresponding proposed modification to Special Condition 3.41 of their electricity transmission license

Dear Irina,

Ocean Winds is an experienced offshore wind developer with a 6GW portfolio of operational and development projects in the UK. We have a track record of delivering two highly complex large-scale projects in Scotland – our 950MW Moray East Offshore Wind Farm and 882MW Moray West Offshore Wind Farm. Both projects were delivered in UK waters and are now well-established in the communities where they will continue to operate providing clean power and economic opportunity for decades to come. In addition, we have two significant ScotWind projects in development – 2GW Caledonia offshore wind farm located in the Moray Firth, and 1800MW Arven floating offshore wind farm in Shetland. With these projects in the pipeline, Ocean Winds has the potential to contribute significantly to the UK's energy transition net zero ambitions.

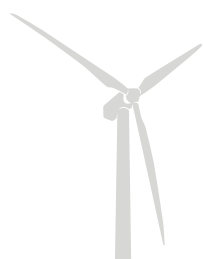
Ocean Winds welcomes the opportunity to respond to this consultation and strongly supports the timely delivery of critical Scottish grid infrastructure improvements. Transmission upgrades are essential to meeting the UK's 2030 clean power targets and broader net-zero goals. Expanding grid connectivity will directly accelerate Scottish offshore wind buildout and in turn reduce costs for electricity customers.

Sincerely,

Dr. Sarah Graham

Engineering Associate Director

Ocean Winds



Ocean Winds' Response to Questions

Q1.1. Do you agree with our minded-to position to provide ECF for the eight projects?

Yes, Ocean Winds supports Ofgem's minded-to-position to provide ECF for the eight projects highlighted in this consultation and allow them to exceed the 20% threshold for ECF spend. Early construction funding is essential to accelerating a portfolio that is critical to unlocking Scottish wind capacity and enabling power transfer from the north and west of Scotland to demand centres in England.

Q1.2. Do you agree with our proposed modification to adjust ASTIAt in Appendix 1 of SpC 3.41?

Yes, Ocean Winds agrees with Ofgem's proposed modification to adjust ASTIAt in Appendix 1 of SpC to reflect SHET's full ECF expenditure request. Updating the allowances accurately reflects approved funding commitments and provides SHET with the clarity needed to proceed with early procurement and enabling works without delay.

Ocean Winds also welcomes SSEN-T's "Housing Our Works" strategy, as set out in paragraph 2.43 of the consultation. Providing adequate accommodation for construction workforces is a practical measure that supports the timely and sustainable delivery of large-scale infrastructure projects. We encourage Ofgem to recognise workforce accommodation costs as a legitimate component of ECF-eligible expenditure where appropriately justified.

