

OFGEM

Submitted via email only.

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Elia Transmission Belgium response to:
"OFTO build: ways forward for an early competition model"

Dear Mr. Nevin,

Elia Transmission Belgium welcomes the possibility to answer to Ofgem's call for input for OFTO Build: Ways Forward for an Early Competition Model.

As the Transmission System Operator (TSO) of Belgium, Elia developed Nemo Link together with interconnector developer NGV and the same partnership received an approval of Ofgem in its IPA stage for the pilot NSI Nautilus, a first of a kind hybrid interconnector with offshore wind farms in Belgian waters. Elia is also part of the Offshore TSO Collaboration, that together with system operators of the Northern Seas aim to create a planning exercise based on regional cooperation.

Through this response, Elia wishes to emphasise the important links between the proposed early competition OFTO build model, NESO's CSNP, and the regional planning work being advanced within the OTC. Accordingly, our feedback addresses those areas of the consultation with a potential impact on these interrelated activities.

It is important to note that our position is based on the vision, shared with other OTC TSOs and supported by national and regional studies, that future offshore development in the North Sea will see an increasing number of interconnections between onshore systems and offshore wind farms across neighboring countries. The envisioned "meshed" offshore network, whereby offshore wind farms are connected to multiple parties, will optimise asset utilisation, increase redundancy, and reduce the number of onshore landing points. Conversely, the complexity of such a network will require enhanced coordination between participants and new technological solutions such as multi-terminal/multi-vendor platforms and DC circuit breakers.

While a meshed grid is a long-term aspiration, offshore hubs offer a more tangible example of complex offshore projects. In an offshore hub, multiple OWF are connected to the same offshore substation and connected to the same offshore transmission.

Increasing the level of complexity, Offshore Hybrid Assets introduce the need for coordination among different countries and actors. OHAs with offshore generators in GB waters (previously called Multi-Purpose Interconnectors), will require a connection to the GB onshore network through radial or non-radial assets, and an interconnection other North Sea Countries. In its [Multiple Purpose Interconnectors Pilot Scheme](#), Ofgem identified different kinds of delivery model, OFTO led and Interconnector's led.

Therefore, in the context of this call for input, Elia wants to highlight that if Ofgem will pursue an OFTO build approach, independently from the delivery model, it will have to be consistent and harmonized with other alternative options such as the MPI regime, in support of the UK's and North Sea's shared offshore ambitions.

An early competition OFTO build model has the risk of adding an extra role among the existing offshore transmission project developers such as generation developers and interconnector developers. Such complexity and superimposition of roles would require a careful design of the individual incentives so that they would not create misalignment among parties or over time.

While the early competition OFTO build model is a step forward to tackle the challenges of offshore coordination, Elia believes that a more holistic approach would be needed in order to deliver the Northern Seas and British offshore grid of the future. As an example, a single actor could be entrusted with the development of a shore-to-shore offshore hybrid assets, from GB shore to the third country's shore with a windfarm connected in between. This single actor, guided by NESO's development plans will also be subject to a unified regime.

As a practical starting point, a competitive interconnector-led development model driven by a centralised tender approach could be applied on both lines of the OHA, before evolving to the single actor model.

The same model and step-wise approach would apply to a more complex topology in which an interconnector to a third country is linked to an existing non-radial asset or to an offshore hub in GB waters. The centralised tender approach proposed by Ofgem, in which the technical standards for future connections and the regimes for the IC are defined, moves closer to the ambition of enabling coordinated network planning between transmission developers and interconnector parties and in minimising potential disputes between generators.

To Elia's view however, it is key that such a centralised tender process is organised in alignment with NESO's CSNP, provided this plan fully integrates the regional outcomes delivered through the OTC's collaborative planning efforts.

In previous Ofgem consultations, Elia has highlighted the importance of ensuring CSNP alignment with European and regional planning processes, in order to coordinate domestic and North Sea-wide offshore grid development. We strongly encourage that the electrical coordination approach for GB's offshore network is based on the broader Northern Seas regional plan.

The regional, TSO-led planning carried out within the OTC does not preclude competition in delivery. However, a centralised, Ofgem-driven approach would foster consistency with the wider European practice, whereby TSOs are entrusted with delivering offshore transmission projects.

Such centralisation will streamline cooperation with interconnector developers and continental TSOs, reducing the complexity faced when engaging with multiple generation developers independently.

Elia remains committed to supporting a collaborative, well-coordinated approach to North Sea offshore transmission, and appreciates Ofgem's efforts in seeking stakeholder input as these new models are developed.

Yours sincerely,

Stefano Meneghello

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