

Ofgem
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By email: oftobuild@ofgem.gov.uk

30 October 2025

Consultation on proposals for OFTO-Build: Ways Forward for an Early Competition Model

I am writing to you on behalf of Transmission Capital Partners (“TCP”), a consortium comprising Amber Infrastructure Group and Transmission Investment, in response to the above consultation. TCP manages, on behalf of International Public Partnerships Limited (“INPP”), one of the largest UK offshore electricity transmission portfolios, and currently acts as the OFTO for eleven transmission assets (including Robin Rigg, Gunfleet Sands, Barrow, Ormonde, Lincs, Westernmost Rough, Dudgeon, Beatrice, Rampion, East Anglia One and Moray East). TCP, with INPP, is one of the largest offshore wind transmission businesses in GB and currently has a portfolio of approximately 4.9GW transmission capacity and over £3.8bn capital deployed.

TCP welcomes the opportunity to provide evidence to assist Ofgem in developing proposals for an early competition OFTO-Build model (“the Consultation”). TCP has been involved in the OFTO regime from the beginning, when Ofgem originally consulted on the establishment of OFTOs in 2009 and has subsequently participated in every OFTO tender process. TCP’s proactive approach to asset management sets it apart from other industry operators and ensures both the highest availability and longest possible life is achieved from the transmission assets under TCP’s management. Our commitment to the regime, and performance within it, assists the UK in meeting its Net Zero targets.

TCP believes the OFTO Build model is appropriate for the delivery of non-radial assets, and as such of coordinated grids, and see no reasons as to why this model should be limited only to non-radial assets. Provided that the risks are well-defined and appropriately proportioned and allocated, there is potential to seek to replicate the success of the Generator-build OFTO model which currently exists.

In addition to the detailed responses set out in the confidential Annex, TCP would like to draw your attention to the following core elements of its response:

- (i) We were disappointed by Ofgem’s decision not to proceed with a pilot project, as in our view although such a project may not be a perfect representation of future tenders, pilots present a beneficial opportunity to learn invaluable lessons from participating and delivering a project. We address in turn some of the challenges that Ofgem noted in the consultation in the Annex, and would welcome further discussion with Ofgem to understand these challenges further;
- (ii) The success of a competitive model, such as OFTO-Build, is reliant upon there being a large and stable pipeline of projects to be competed, where learnings and efficiencies can be rapidly built upon by those involved. To support the development of such a pipeline transitioning to a framework whereby all non-radial systems are competitively tendered as OFTO-build would seem most appropriate, and aligned to the future direction of travel to centralised planning and coordinated offshore grids;
- (iii) The commercial model should use the CATO framework as a base but be appropriately tailored to meet the market conditions of offshore projects while ensuring there is sufficient incentive for potential OFTO build proponents to participate.

Thank you for the opportunity to respond to this consultation. We hope the contents of this letter are helpful and we would be pleased to discuss any points raised.



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Yours sincerely,

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A handwritten signature in blue ink, appearing to read 'C. Veal', with a long, sweeping horizontal stroke extending to the right.

Chris Veal

Director