COMMON WEALTH

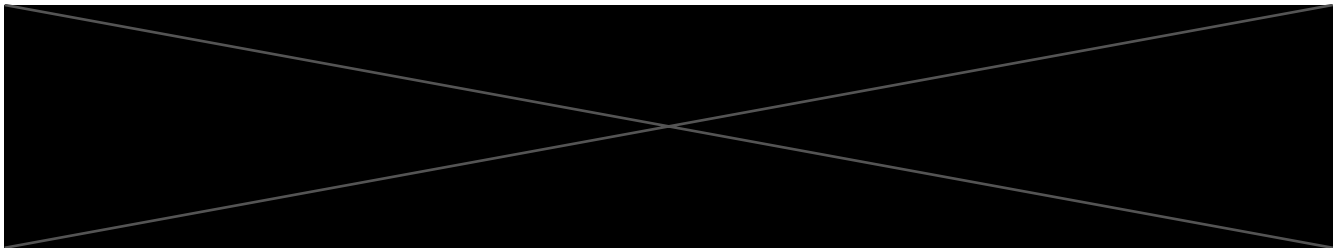
CWAM response to Ofgem's RIIO-3 Load Re-opener Draft Determination

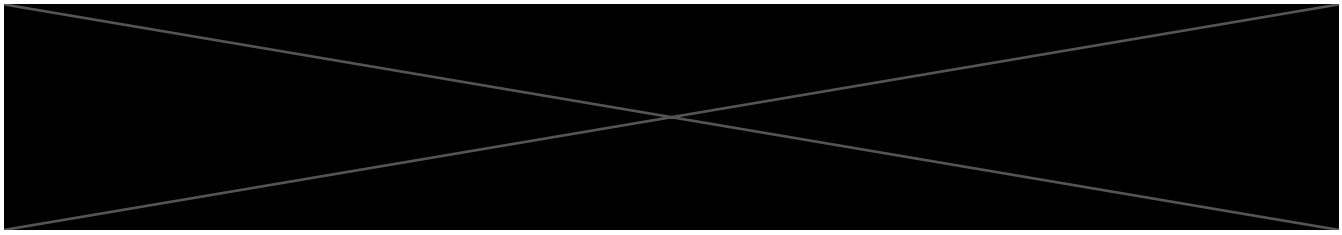
Dear ET Investment Determinations Team

CWAM is pleased to respond to Ofgem's consultation on its Draft determinations for the RIIO-ET3 Load Re-opener. Our answer should be read as a response to question ***MPQ1: For each project where we are minded to apply the Major Projects ODI-F, do you agree with our proposal?***

CWAM agrees with Ofgem's proposed treatment of NGET's East Claydon – Enderby – Patford Bridge 1 and 2 OHL project.

Transmission network investment is critical to increasing the capacity of the UK's network so that it can meet the challenges of the future – in particular the growth of renewable energy and the growth in demand, including from vital digital infrastructure.





We are pleased that Ofgem is minded to apply the MP ODI-F at a later stage and that the project has been accepted by Ofgem into Track 2 thereby benefiting from fast track assessment and bypassing the Needs Case Assessment stage.

Ofgem's assessment of the consumer benefit of the project currently focuses on increased boundary capacity, reduced curtailment of renewable generation and avoided constraint payments. Those benefits are of course of vitally important. However, we consider a crucial element missing from the assessment is the benefit of enabling strategically important demand

connections. Ofgem does account for this in its assessment of other projects (eg Blyth) and it is remiss to not account for these for the East Claydon – Enderby – Patford Bridge 1 and 2 OHL project.

Given the importance of the East Claydon – Enderby – Patford Bridge 1 and 2 OHL project, we ask Ofgem to confirm the application of the Major Projects ODI-F at the first Project Assessment opportunity, rather than defer the decision to a later application window. Further, it is crucial that the Target Delivery Date is suitably ambitious, ideally pre-2030, to ensure the works are completed in time to support both CP30 and strategically important demand sites.

Should you have any questions about this response, please do not hesitate to contact us. We would be glad to provide further evidence on the connection and its economic impact, including on a confidential basis, should that assist Ofgem's assessment at Project Assessment stage.

Kai Victoria
CWAM