



Highlands and Islands Enterprise  
Iomairt na Gàidhealtachd 's nan Eilean

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Dear Ms. Nugent

**Response to Ofgem impact assessment on CUSC Amendment Proposal CAP 170,  
Category 5 System-to-Generator Operational Intertripping Scheme**

Highlands & Islands Enterprise (HIE) welcomes the opportunity to respond to the impact assessment on CAP170. Transmission access is considered highly important by HIE for the economic development of the Highlands and Islands of Scotland. HIE has responded to a number of consultations on issues affecting development, access and management of grid infrastructure. We are working closely with Scottish Government (SG) in relation to a wide range of regulatory issues and are supporting its efforts to challenge barriers currently blocking renewables development across Scotland.

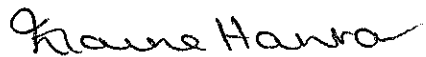
HIE welcomes the use of intertrips as a system management tool as part of a policy to use existing assets efficiently whilst allowing new generators to connect ahead of system reinforcement. This is certainly very helpful under a Connect and Manage policy.

HIE is also aware of concerns expressed by industry that the remuneration for installing intertrips, and the risks and costs associated with being tripped off the system, have not been adequately reviewed as part of CAP 170. HIE shares these concerns.

HIE also note that the use of administered payments is as much a commercial as it is a system management tool for National Grid. We think this requires some very careful consideration and we would tend to support industry comments that cite a preference for commercially negotiated contracts.

We hope you find these comments useful and look forward to viewing the outcomes of this consultation on the impact assessment in due course

Yours sincerely

A handwritten signature in black ink, appearing to read 'Elaine Hanton', with a stylized, cursive script.

Elaine Hanton  
Head of Energy  
Key Sectors  
Highlands and Islands Enterprise