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Sam Cope Policy Manager, Regulatory Regime Development Ofgem 9 Millbank London SW1P 3GE

12th February 2010

Dear Mr. Cope,

Consultation on Offshore Electricity Transmission Enduring Regime

Acciona Energy UK Ltd is the UK subsidiary of Acciona Energy, a world leader in renewable energies with almost 9,000 MW installed for its own account or for third parties, in the main clean technologies. It has set up 271 wind farms, 79 hydroelectric plants, three biomass plants, three concentrating solar power plants and a large number of photovoltaic facilities of different types.

Acciona Energy fully supports the competitive tendering of offshore transmission licensees required to deliver the significant expansion of the offshore transmission network to 2020 and beyond. We fully support the regimes goals of driving down costs and improving efficiency through innovation and competition.

We highlight the need to continue the commitment of running the first enduring tender this year and urgently request that greater flexibility is incorporated into the regime by allowing developers to design and construct their own grid connection before transferring it to an OFTO. This flexibility is required for a number of reasons:

- Increases supply chain confidence and therefore essential investment.
- Allows Round 2.5 to become a reality where a grid connection is required by 2016.
- Reduces delay uncertainty to initial enduring projects, thus giving developers more control over qualifying for DECC's 2 ROC enhancement which is available until March 2014.

Furthermore this additional flexibility could be easily implemented into the existing regime without any major changes. Our key request to you is that **both** early and late OFTO processes are incorporated into the enduring regime. This brief submission is to be read in conjunction with the response submitted by the BWEA which we fully support.

Yours sincerely

Simon Morgan Project Development Manager