

Balfour Beatty response to Ofgem *Consultation on a proposed framework to enable coordination of offshore transmission.*

CHAPTER 2: Overview of our proposed framework for the delivery of coordinated offshore transmission assets

Q2.1 Do you agree with our high-level framework for the development of coordinated offshore transmission assets?

Yes. The framework covers likely options and cost controls as well as developer, Ofgem and onshore TO involvement.

Q2.2 Do you agree with our expectations of how coordination opportunities will be identified for parties to progress? Are they consistent with existing roles and responsibilities of parties with regards to the development of the network?

Yes. We consider that onshore TOs and Netso would be the primary source of identifying coordination opportunities. We also think that Ofgem expectations are consistent with the existing roles and responsibilities of Netso and TOs.

Q2.3 Do respondents consider that changes to the CION process are needed, for example, should the CION be developed further to support coordination? If so, what changes are needed to the process or document? Would an improved CION assist in building developers' confidence in accepting coordinated connection offers?

Yes. We believe that the CION process would be a useful way to seek Developers' views and get their buy in to possible options.

Q2.4 Are there any barriers to improving the CION, if so, what barriers exist and how could they be addressed?

n/a

Q2.5 Do respondents anticipate issues with the design or delivery of transmission assets where generation projects are reliant on works to be undertaken by another developer? If so, what would be the appropriate mechanism to address such issues?

Yes, we would expect that there may be issues with timing and ratings and interfaces. We would propose that Netso is best placed to manage a coordinated approach.

Q2.6 To what extent could NETSO intermediation mitigate data confidentiality issues between developers? Are any further measures required?

We consider that Netso is best placed to mitigate data confidentiality issues between developers.

CHAPTER 3: Category 1: Generator-Focused Anticipatory Investment

Q3.1 Do respondents agree with our preferred option, to support the transfer of GFAI assets to the OFTO if security is provided to protect consumers against stranding risk?

Yes we agree with Ofgem preferred option.

Q3.2 To what extent do the current user commitment arrangements address the scenarios set out in table 3.1 and paragraph 3.13?

n/a

Q3.3 Are there any barriers to extending user commitment arrangements to address any gaps identified in question 3.2?

n/a

CHAPTER 4: Category 2: Developer-Led Wider Network Benefit Investment

Q4.1 Do you agree that the NETSO should support the needs case for developer led WNBI, drawing on relevant TO(s) as necessary? Do you consider changes to the NETSO licence or industry codes are needed to support this?

Yes we fully agree. It is not obvious to us why there would be a need to change the Netso licence.

Q4.2 Are there any specific barriers to the NETSO sharing information required to support the needs case for developer led WNBI with the appropriate developer?

We do not believe so.

Q4.3 What are your views on the criteria that Ofgem could use when assessing proposals for developer-led WNBI?

We agree with the assessment criteria listed in the consultation document.

Q4.4 Do you agree with our proposal for the timing of the Ofgem assessment gateways to support developer-led WNBI?

We agree that signing the BCA is a clear commitment and should trigger the first gateway. We agree that it is important to retain a flexible approach to the timing of the second gateway, providing the process does not, in itself, delay the project.

Q4.5 Are there some specific types of low regret WNBI that developers may be willing to take forward without a gateway assessment?

We would expect that engagement with Netso could give developers the necessary confidence to take forward certain schemes, especially where these promote future costs savings and network flexibility.

Q4.6 Do you consider that there should be a de minimis threshold for low regret developer-led WNBI? What are your views on how this should work, while

ensuring consumers are not exposed to significant stranding risk? Where possible, please provide evidence of the types and costs of WNBI that you consider should be captured by the threshold.

n/a

CHAPTER 5: Category 3: Non Developer-led Wider Network Benefit Investment

Q5.1 To what extent do you think it would be appropriate for onshore TOs to take forward preliminary works for non developer-led WNBI?

We believe that it is important that onshore TOs take forward preliminary works in support of wider network development.

Q5.2 What are your views on the criteria that Ofgem could use if assessing proposals at the first gateway for non developer-led WNBI?

We agree with the criteria listed in Ofgem consultation document, and would highlight the importance of ensuring that the process does not delay proposals.

Q5.3 What are your views on using two gateways for non developer-led wider network benefit investment?

We agree with the two gateway approach. We believe that where a scheme is considered viable, the emphasis should be on achieving a high degree of certainty at the first gateway.

Q5.4 What additional incentives and requirements should be placed on preliminary works funding for non-developer led wider network benefit investments?

As well as timing and stakeholder engagement, we consider that preliminary works activities should not be too narrowly focussed on detailed particular solutions.

Q5.5 What parties should onshore TOs be expected to engage, and what engagement processes should they follow before and during preliminary works? We consider the list in Ofgem consultation document to be appropriate and would support proactive engagement via consultations and workshops.