

Gareth Atkins
Partner, European Wholesale
Ofgem
9 Millbank
London
SW1P 3GE

Your ref

Our Ref

Date 4 March 2013

Contact / Extension

Alan Michie
0141 614 1958

Dear Gareth,

Consultation on a Proposed Framework to Enable Coordination of Offshore Transmission

SP Transmission Ltd welcomes the opportunity to respond to this consultation. As an onshore Transmission Owner ("TO"), SP Transmission must comply with its transmission licence and focus on delivering its RIIO T1 outputs. This includes complying with the SO-TO Code, which includes making TO Construction Offers to National Grid as SO for new connections, including offshore developments. It also includes compliance with the NETS SQSS.

Due to the scale of renewable generation connecting in Scotland, we have a series of major reinforcement projects underway. This includes building the offshore Western HVDC link, which is currently under construction, and pre-construction work for an offshore Eastern HVDC link. These offshore "bootstraps" are Main Interconnected Transmission System (MITS) reinforcements required to ensure a compliant GB transmission network.

Preliminary Works

We believe the proposal for onshore TOs to undertake 'preliminary works' relating to WNBI needs further clarification as much depends on the role, scope and scale of work required.

The issue of liability also needs to be considered.

As an onshore TO we would be involved in the "offshore process" through being involved in connecting offshore networks to the onshore network. We would ensure that any offshore connection aligns with our TO Construction Agreement with the SO, and that offshore connection/s do not lead to a non-compliant GB transmission network, in which we are well placed to assess given our understanding of the NETS SQSS relating to our transmission network and also adjacent networks.

Our extensive RIIO T1 work programme means that it would be extremely challenging to allocate scarce engineering resources to support the design and development of offshore networks being developed by others. Although funding is being offered by Ofgem to undertake preliminary

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works, there is a risk that in reallocating staff to this activity it could compromise on the delivery of our RIIO T1 outputs.

The Eastern HVDC Bootstrap

Our involvement in both the Western HVDC and Eastern HVDC projects has highlighted the practical difficulties in connecting offshore wind farms and transmission assets on a common system. An offshore integrated transmission network will be significantly different from existing onshore networks with commonplace onshore apparatus simply not available for a DC network, or severely challenged by the offshore environment. We believe that it is important that windfarm developers, OFTOs, onshore TO's and Ofgem have a common understanding of the technological challenges and opportunities that are emerging in integrating offshore generation.

Working with NGET and SHETL, we are currently undertaking pre-construction work on an Eastern HVDC "bootstrap". We would comment that this link does not qualify as WNBI as there are no plans for offshore connections to connect to this link through offshore hubs. In effect, this link does not align with the example in Figure 2.1 of this consultation.

If you have any queries please do not hesitate to get in touch with myself or Alan Kelly on 0141 614 1736.

Yours sincerely,

A handwritten signature in black ink that reads "Alan Michie". The signature is written in a cursive, slightly slanted style.

Alan Michie
Transmission Policy Manager