

**Regulation & Commercial** 

By e-mail sheona.mackenzie@ofgem.gov.uk

Sheona Mackenzie, Senior Policy Manager, Electricity Transmission

3rd Floor, Cornerstone, 107 West Regent Street, Glasgow, G2 2BA Your ref

Our Ref

Date 12 June 2013

Contact/Extension Alan Kelly 0141 614 1736

Dear Sheona,

## Consultation on the needs case for the proposed Kintyre-Hunterston transmission reinforcement under the RIIO-T1 Strategic Wider Works process

SP Transmission Ltd (SPT) welcomes the opportunity to respond to this consultation as we have developed the project in partnership with Scottish Hydro Electric Transmission plc (SHE Transmission). The project comprises the installation of 2 x 240MVA 220kV AC cable circuits from the Kintyre peninsula to Hunterston. Each 220kV cable circuit will be approximately 46.2km end to end, of which 3.6km will be within the SPT area. SHE Transmission will own the subsea cable up to and including the underground transition joint at Ardneil Bay. The proposed scope of SPT's works is to install 2 x 240MVA 220kV 3.6km underground cable circuits from the transition joint to Hunterston.

Our contribution to this project is included in our RIIO-T1 baseline plans, and since Ofgem's fasttracked approval of our submission, we have been working closely with SHE Transmission to progress this project. We fully support Ofgems view that there is a demonstrable need for this proposed reinforcement and the timing and technical scope of the project are appropriate.

As evidence of the close working relationship with SHE Transmission on the development of the project so far I would like to highlight the progress we have been making:

In view of the technical challenges associated with transitioning from 220kV subsea to underground cable and recognising that SHE Transmission will own 42.6km of the 46.2km cable route length, we agreed with SHE Transmission that they would lead a competitive tender process for design, manufacture and installation of the end to end 220kV cable system from Crossaig to Hunterston and SHE Transmission will place cable contract. It is intended that following the tender process, SPT will procure the

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SP Transmission Ltd, Registered Office: 1 Atlantic Quay, Glasgow, G2 8SP Registered in Scotland No. 189126 Vat No. GB 659 3720 08 SP Manweb plc, Registered Office: 3 Prenton Way, Prenton, CH43 3ET Registered in England and Wales No. 2366937 Vat No. GB 659 3720 08 SP Distribution Ltd, Registered Office: 1 Atlantic Quay, Glasgow, G2 8SP Registered in Scotland No. 189125 Vat No. GB 659 3720 08 Hunterston land section of the 220kV cable system via a Commercial Agreement with SHE Transmission.

We are aware that a minor modification to the SHE Transmission licensed area is required to enable ownership of the cable and transition joint at Ardneil Bay. SPT support the recent application of a licence change by SHE Transmission to include the necessary assets in their licence area to accommodate this change.

SPT has a statutory duty to develop and maintain an efficient, coordinated and economic system of electricity transmission. We consider the proposed works by SHE Transmission and ourselves are the most appropriate engineering solution and at the optimum cost to satisfy technical and economic requirements.

If you have any queries please do not hesitate to get in touch with myself or Alan Michie on 0141 614 1958

Yours sincerely,

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Alan Kelly Transmission Policy Manager