

Jon Parker  
Offshore Coordination Policy  
Ofgem  
9 Millbank, London  
SW1P 3GE

24 November 2014

Dear Jon,

I would like this letter to be considered alongside your request for consultation on “Integrated Transmission Planning and Regulation (ITPR) project”.

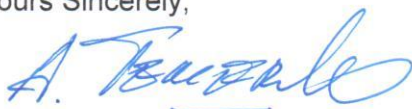
Offshore Group Newcastle (OGN Group) is currently developing a new interconnector scheme that would link strong nuclear generating facilities on the north coast of France to the UK market. This interconnector will improve security of supply, lower cost of generation and provide cheaper electricity for the consumer.

OGN Group appreciates Ofgem intentions to provide an update to the regulatory framework governing the planning and delivering the onshore, offshore and cross-border electricity transmission network in GB. OGN Group also welcomes Ofgem decision to keep the developer-led approach in developing new interconnection.

At the same time we are concerned with the enhancement of System Operator role in planning and coordinating interconnection to the United Kingdom. National Grid already operates 2 interconnectors (France and Netherlands) out of existing 4 and has further plans to develop another 4 (France, Belgium, Norway and Denmark). Granting additional powers to the NGC to assess and decide on viability of each scheme may unintentionally hinder competition and provide an unfair advantage to a single developer. OGN Group believes that these powers should be reserved to an independent body and therefore support the creation of an Independent System Operator (ISO) or Independent Design Authority (IDA) as muted in your Emerging Thinking and further outlined in the Draft Conclusions.

However if the proposals outlined in the consultations are to be taken forward, NGC and specifically National Grid Electricity Transmission must become more transparent and public with its decision-making and how it handles information with other parts of NGC. We support the proposals outlined in Chapter 4 of the consultation, but we also strongly believe that further transparency can be archived by **making NGET subject to Freedom of Information Act 2000**. This will allow external bodies to further scrutinize the work of regulated arm of NGC and will help prevent NGC from gaining an unfair advantage over other developers.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Temerko'.

Alexander Temerko  
Vice-Chairman