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Jon Parker
OFGEM
9 Millbank
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Our Ref: EN01-004955

24 November 2014

Dear Jon,

Re: RES Response to ITPR Project draft conclusions

Renewable Energy Systems Ltd (RES) welcomes the opportunity to respond to the Ofgem “*Integrated Transmission Planning and Regulation (ITPR) project: draft conclusions*” document of 29 September 2014. RES is one of the world’s leading independent renewable energy project developers with operations across Europe, the Americas and Asia-Pacific. RES has been at the forefront of wind energy development since the 1980s and has developed and/or built more than 8GW of wind energy capacity worldwide, including projects in the UK, Ireland, France, Scandinavia and the United States.

RES has contributed to and supports the response to this consultation submitted by RenewableUK (REUK). In addition to the points raised in the REUK response, RES would emphasise that it supports the direction of travel of the draft conclusions but, in particular, would note the following additional observations.

1. Enhanced System Operator: RES would encourage Ofgem to consider the extent to which existing arrangements set out under regulated industry codes, especially those provided under the SO-TO Code (STC) Investment Planning provisions, currently enable system operator co-ordination of system planning.
2. Competition in Onshore Transmission: RES would note that prices and costs quoted by existing onshore transmission licensees indicate that the introduction of competitive market forces to onshore transmission would realise significant benefits to industry participants and, ultimately, the energy consumer.
3. Processes to support competition in Onshore Transmission: RES understands that the introduction of competition in onshore transmission will require clearly defined rules and processes in order to provide necessary investor and market confidence. However, in developing the new rules and processes, RES would encourage Ofgem to be mindful of associated potential project delays and costs.

RES looks forward to providing more substantive input to further consultations on ITPR.

Yours sincerely,

Registered in England & Wales Number 4913493
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