

By e-mail, sent on 10/11/2014

Dear Sir/Madam

Warwick Energy Limited (WEL) is pleased to provide feedback to the above consultation and the draft conclusions published on 29th September 2014.

WEL are supportive of the draft conclusions in the paper, particularly those around adopting a developer-led approach to such proposals and the flexibility surrounding the assessment of any requests for underwriting of costs by UK consumers on a case-by-case basis. The range of potential initiatives, particularly those involving non-GB generation sources, is so wide that a 'one size fits all' solution would clearly not be appropriate.

The default position against consumer underwriting of the new offshore transmission assets seems reasonable as long as the connection application process relating to the point of connection onshore in the UK is not affected, particularly involving the financial security aspects of BCA's, to avoid any undue discrimination. We would be grateful for confirmation of the position in this regard.

The proposed changes to the role of the SO, and the formalisation of the CION process, both look reasonable.

Some concerns exist about the presumption to classify all non-GB connections as 'Interconnectors' in UK territorial waters even when grid-to-grid connections are not part of the design. We are not sure we agree with your interpretation of the 1989 Electricity Act in this regard. This might potentially involve unintended consequences that could act against sourcing the lowest possible cost renewable energy for UK consumers, though the willingness to assess each project on its merits should hopefully mitigate against this risk.

Please contact me if you wish to discuss this subject further.

Regards

Mark Petterson
Executive Director
Warwick Energy Limited

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