

9th July 2015

By email

Dear Ms. Scott,

Criteria for onshore transmission competitive tendering—RenewableUK response

We welcome the opportunity to comment on this consultation. Our response is below. RenewableUK is the trade and professional body for the UK wind and marine renewables industries. Formed in 1978, and with over 600 corporate members, RenewableUK is the leading renewable energy trade association in the UK. Wind has been the world's fastest growing renewable energy source for the last seven years, and this trend is expected to continue with falling costs of wind energy and the urgent international need to tackle CO₂ emissions to prevent climate change.

Please feel free to contact me on 020 7901 3046, or at nik.perepelov@RenewableUK.com should you require any additional information.

Yours sincerely

Nik Perepelov
Onshore Wind Development Manager
RenewableUK

1. No specific comment.
2. A fixed £100m threshold has the benefit of simplicity and clarity compared to a range of £50-100. It also precludes non-SWW assets (i.e. assets in SPT's patch worth £50-100m), which keeps simpler processes (it is not clear how to introduce tendering to the NDP process). On the other hand, the number still appears to be somewhat arbitrary. On this basis, it is difficult to judge whether it should apply to whole-life or just CAPEX. Indeed, a decision on the latter would better inform analysis of the appropriate threshold, as it would give some clarity on the type of asset likely to be subject to tender. We therefore ask that more justification for the threshold is provided, which pre-supposes a decision on whole-life or CAPEX having been taken (but in that context, the actual decision is not particularly significant).
3. Introduction of any new process risks destabilising projects that are already in train. The proposed definition of 'new' would seem to apply to a number of projects that have undergone some level of design and assessment within the incumbent TO's teams. This risks unsettling these projects, potentially causing TOs to reconsider their processes and timescales. To avoid this risk and safeguard such projects, we would suggest that appropriate transitional provisions are introduced.
4. No comment, though final criteria should be as clear as possible to avoid delay/dispute.
5. As (4).
6. Any uncertainty around application of the criteria on a project basis will feed into risk for generators. We would therefore suggest, though reducing scope for flexibility, strict and unambiguous criteria reduce scope for disputes and delay and would therefore best achieve the relevant objectives.
7. No.