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STATKRAFT'S RESPONSE TO CONSULTATION ON PROPOSED MODIFICATIONS TO STANDARD LICENCE CONDITIONS 14 AND 15 OF THE ELECTRICITY GENERATION LISENCE

This letter contains Statkraft's response to the consultation on proposed licence modifications to Standard Licence Conditions 14 and 15 of the electricity generation licence.

Statkraft is a developer and investor in the UK since 1983 – operating several onshore wind farms and the Sheringham Shoal offshore wind farm. The company is a development partner in the Dudgeon offshore wind farm which now is being constructed. Statkraft has acquired half of the planned Triton Knoll offshore wind park, also off the Norfolk coast. Statkraft is also a Partner in the Forewind consortium, developing the Dogger Bank offshore wind project. We are among the largest providers of Power Purchase Agreements a to independent renewable power generators in the UK.

Statkraft has major operations in Norway, and active in more than 20 countries and 3600 employees worldwide.

Statkraft responded in January to the original consultation published in November last year and welcomed the modifications. We are still of the view that the proposed modifications are positive and important. Developing offshore wind farms is lengthy, complicated and costly process. There is hence significant cost at risk. There is in particular a risk that the offshore wind farm is unable to secure necessary consents and arrangements, or is unable to secure a CfD through the auction based allocation mechanism. Reducing time, cost and risks associated with offshore wind power development will be critical in securing continued successful deployment of offshore wind going forward. In this context, access to land for offshore wind developers to do preliminary works in relation to electric lines for the offshore wind park is of importance.

We agree that the current wording of SLC 14 and SLC 15 are unsatisfactory in relation to ensure necessary rights for compulsory entry powers for land surveys for electric line works.

Statkraft has not in detail considered the exact wording of the modification as proposed in Annex 1 to the consultation document, but our general assessment is that the suggested changes should be accommodating the intent of clarification and strengthening of compulsory powers.

What we miss in the consultation document is the timing of when the modifications are expected to take place and what process steps will be taken before any changes are formally adopted. We would urge that the modifications should be carried through without delay.

Yours sincerely,
for Statkraft UK Ltd



Bjorn Drangsholt
Managing Director