

Our Ref: DSCT/RS BRL/ADM-2

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Forward Work Programme  
Ofgem  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

**BY POST & EMAIL:**  
**[fwp@ofgem.gov.uk](mailto:fwp@ofgem.gov.uk)**

Dear Ofgem

## **BANKS GROUP RESPONSE TO OFGEM CONSULTATION ON FORWARD WORK PROGRAMME 2020-2022**

Thank you for the opportunity to respond to your consultation on your Forward Work Programme 2020-2022.

Banks Renewables is an independent renewable generator with 223MW of operational onshore wind generation assets.

We are really pleased with the government's commitment to net-zero and the changes this is driving in your forward plan. We are part of decarbonising the electricity system to date and wish to play our part in further decarbonising at lowest cost. We have come a long way but need to plan to ensure we deliver for 2050.

Finalisation and implementation of the energy network reforms (TCR, Access SCR) are essential to the delivery of the carbon reduction targets. We are concerned that previous decisions have not fully taken into account the impact on investment in onshore wind and solar, slowing progress, and would not want this to happen again.

The volume of network charging change has also increased uncertainty adding an additional barrier to the growth of low carbon generation.

There is no specific mention of a replacement for the small generators discount for generators connected at 132kV in Scotland post 2021, is this expected to be covered by the Access SCR work and implementation of the TCR?

The price control reviews are an excellent opportunity to ensure that network owners are incentivised to support and drive the change to net-zero. We would encourage Ofgem to consider new and innovative incentives to make full use of this opportunity. The late or unreliable delivery of works and/or outages have significant impacts on consumers and generators e.g. Western HVDC link.

We support your work planned to review interconnector funding to ensure there is a level playing field for UK projects. In our view the lack of charges on interconnectors and the availability of subsidies gives them unfair advantages and there is not presently a level playing field with European competitors where generators pay less transmission charges and consumers more.



Overall, we support the focus on decarbonisation at the lowest cost, please help us by playing your role to provide a stable and positive investment environment.

Yours sincerely



**Dan Thomas**  
Operations and Grid Director

DD: 0191 378 6289

E: dan.thomas@banksgroup.co.uk

CC: Richard Dunkley  
Barney Pilgrim  
Andrew Liddell  
Mark Rowcroft  
Yonna Vitanova Yonna.vitanova@renewableuk.com