



Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

SuperNode Ltd
4 Burton Hall Park
Burton Hall Road,
Sandyford, Dublin 18.
Ireland

20 February 2020

Dear Mr Perkins,

We are delighted to see new leadership and initiative undertaken by Ofgem in the area of optimal grid planning in the context of decarbonisation. We welcome this opportunity to share some of our views and to inform the important issue of grid planning for the UK. We have restricted our submission on both FWP and DAP to the actions most pertinent to SuperNode Ltd.

Below are our comments on some key aspects of your recently released plans; three related to the Decarbonisation Action Plan (DAP) and one related to the Forward Work Programme. We hope you appreciate us combining into one submission as we feel the two documents are very closely related.

Action 2

1. “We will set up a new strategic innovation fund focussed on the challenge of decarbonisation”

This is a welcome development and acknowledgment that innovation can benefit consumers and that existing solutions can be improved upon and indeed sometimes very significantly.

The fund initiative in turn raises some questions:

Will this fund extend explicitly to transmission technologies themselves?

If so, what type of funding do Ofgem foresee?

Will incentives be placed upon licenced entities to ensure an openness to the ideas and innovation of the private sector?

Action 3

2. **“We do not consider that individual radial offshore transmission links for this amount of offshore generation are likely to be economical, sensible or acceptable for consumers and local communities”** p19, DAP.

Was this Ofgem’s opinion with the NECP-committed target of 30GW by 2030 or is this a new opinion based on the recently increased political targets of 40GW by 2030?

What is the level, in terms of capacity, that Ofgem sees as the “tipping point” for changing the topology? We see that tipping point being now. Perhaps as early as Round 5 there should be provision / advantage given to projects which include anticipatory investment. Against what scenarios (e.g. 2050 exports?) might some level of future proofing or anticipatory investment be considered?

3. **“...working with government and industry to review the frameworks...”** p19, DAP.

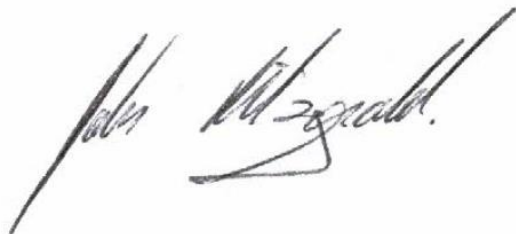
What format will this work take and in what timeline? In general, we feel strongly that companies that can contribute, like SuperNode, should have a strong voice in the design.

4. **“Key milestones – April to June 2020 Issue a call for evidence on barriers to growth of low carbon flexible technologies”** p21, FWP.

From what we can see, this is focussed on new tech in the Heat and Transport categories, new regulatory models for Nuclear and Capacity Market reform. How might we describe the barriers to growth which are implicit in the grid code and existing network technology and architecture? For example, HVDC and meshed grids?

We would welcome the opportunity to engage directly with Ofgem and with other stakeholders.

Kind Regards,

A handwritten signature in black ink, appearing to read "John Fitzgerald".

John Fitzgerald
CEO, SuperNode Ltd