

# TRANSMISSION CAPITAL PARTNERS

By email to NTIMailbox@ofgem.gov.uk.

Rebecca Barnet  
Deputy Director  
Systems & Networks  
Ofgem

20<sup>th</sup> January 2020

Dear Rebecca

## **C27 Statutory Consultation**

Transmission Capital Partners manages one of the largest offshore electricity transmission portfolios in terms of the capacity of offshore wind connected. Our managed portfolio of Offshore Transmission Owner (OFTO) assets includes the connections to the Robin Rigg, Gunfleet Sands, Barrow, Ormonde, Lincs, Westermost Rough and Dudgeon offshore wind farms, and we are preferred bidder on the Rampion and Beatrice OFTOs - a portfolio of circa 2.5GW and £2bn in capital employed.

We remain strong advocates of introducing competition into the delivery of onshore transmission and we continue to support the development of the required arrangements *inter alia* through industry groups, responding to consultations such as this one and providing evidence to parliament.

We are supportive of the licence amendment proposals and are not suggesting any changes to what has been proposed.

You will recall that we responded to the February 2019 consultation and our comments in that response, whilst not proposing any changes to the licence amendment proposals, are still relevant.

In respect of the development of projects which meet the criteria for competition, we note the change in the proposal to describe the ESO's role in early development works as "*desktop works*". We continue to believe that a "*late model*" for competition in networks would be beneficial for consumers, and could provide at least a transitional stage to an "*early model*" for competition. Whilst we understand no decisions have as yet been taken as to who should carry out early development works under a "*late model*" we note that the ESO is reluctant to perform these works, and we also understand that the three incumbent TOs are equally reluctant. In the absence of any of these parties performing the role, then clearly it would need to be a new party.

We are involved in the ESO's workstream to develop models for early competition. One of these models is to include a "*design-only*" element. We consider that if this "*design-only*" element was required to include early development, then this would both place upon the

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designer the risk and responsibility for delivering the consents for their proposed design (and so incentivise them to design consentable projects) and also provide a party to deliver these early development works.

Yours sincerely,



**Chris Veal**

Director, Transmission Capital Partners GP Limited,  
*On behalf of* Transmission Capital Partners Limited Partnership