

Dear Sirs,

OpenHydro is a world-leading developer of tidal stream power generation technology and has been present at the EMEC test centre in Orkney since 2006 where it is now testing the 7th generation of its proprietary Open Centre Turbine. The company has a number of project development interests in the UK including the Brims Tidal Array located in the Pentland Firth, Scotland, and Tidal Ventures project off Antrim, Northern Ireland.

The Brims Tidal Array Limited (BTAL) project company is one of the two parties presently contracted with NGET for grid connections on Orkney and as such will be dependent upon delivery of a transmission reinforcements from Orkney to the Scottish mainland. BTAL is therefore extremely interested in the issues raised in the consultation regarding RIIO-T1 Strategic Wider Works (paras 2.22 – 2.37 inclusive); question 8, chapter 2.

Regarding Needs Case submissions at paragraph 2.25: We agree that TOs should submit the most economic and efficient proposal (having considered a reasonable range of alternatives) as this should be the proposal that is most likely to succeed. We note that a Needs Case takes some time to prepare and this can take place against a shifting technical, regulatory and political background. Hence, formalising the requirement to submit the most economic and efficient proposal assumes that the TO is able to make the judgement call in the first place. If the TO considers the background too uncertain then it will lead to increased risk of delays and extended periods of uncertainty for project developers and slower delivery of government ambition. This is a current issue for Scottish Island connections which are predicated upon significant volumes of renewable generation.

Irrespective of the merits of making this a formal requirement or not, we suggest that improvements to the Needs Case process are possible for contracted parties to help them manage their risk more effectively. This would include greater clarity around the evaluation of the economic and efficiency tests, improved TO interaction and engagement with dependent parties, including visibility of development programme and alternatives considered. We would welcome any moves in this direction.

Regarding ongoing assessment of approved SWW at para 2.30: While we agree that it is necessary to avoid stranded assets, we would be concerned about any additional uncertainty or risk exposure to developers arising. Any review of progress or continuing need must include an impact assessment of any mitigation (delay, re-design or cancellation) of SWW upon dependent contracted generators.

With respect to availability and security of island connections (para 2.37) we welcome this discussion and support further investigation of the issues identified.

Yours faithfully,
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