Question 1 The highest scenario posited now, at 818 MW is an improvement to the 704MW in the previous consultation.

Although this is an improvement in our opinion it is, in our view, still too pessimistic. In our previous response of May 28th
2019 we wrote "...even a 800MW connector is now insufficient, We strongly believe that the case for a 1GW connection is
clearly not just desirable but in all parties' best interest." We have not changed our opinion.

Question 2 Views on the demand sensitivity explored by SHE-T

We cannot determine what the likely demand will be - given that the discussions between SHE-T and NGESO and parties
seeking connections are confidential.

Question 3 Views on link options considered by SHE-T.

See Q1. .... but if the choice is between a 600 MW interconnector or nothing we will support the 600 MW "option."

Regarding the proposed mitigation options - we believe that the SHE-T statement in 2.40 is unacceptable and
contradicts the Cost Benefit Analysis presented. The CBA shows that, even if demand does not materialise, no mitigation
is necessary until generation exceeds at least 818MW.

Additionally, the CBA clearly shows that in all scenarios (without having to apply mitigation measures such as ANM or
Queue Management) it is cheaper for the consumer to connect at least 818MW of generation to the 600MW link rather
than it would be to build an 800MW link.

Any proposal by SHET to build a new link, at an additional capital cost of at least 100% for anything less than 818MW
of generation would be contrary to the Least Worst Regrets analysis presented in the CBA.

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of generation would be contrary to the Least Worst Regrets analysis presented in the CBA.

Given that the CBA selects a 450MW link as the best option for connecting 818MW of wind in several of their scenarios
we would expect a 600MW link would be the best option for connecting 818/450*600 = 1091MW of generation with
constraints payments to impacted generators would be the best value for consumers before any consideration of an
additional HVDC link.

Further comments on the proposed mitigation options:

2.40.1 Active Network Management

We believe that turning off viable and economic renewable energy generation because the proposed link is too small is completely
unacceptable - unless impacted generation is compensated via constraint payments.

2.40.2 New Demand

Both Ofgem and SHET are basing the size on new demand. If the new demand does not materialise in a timely manner we would
expect Ofgem, SHE-T and NGESO to fulfil their commitment and to make constraint payments to the impacted generation.

2.40.3 New Energy Storage

How can SHE-T propose this as a mitigation when it is not within SHE-T's power and is a role for the market? We, therefore disagree
that this is a relevant mitigation.

2.40.4 Queue Management

We believe this process has not been developed or yet received industry or regulatory approval - and, therefore we reject it as an option.

Question 4: Views on the technical design and costs of the proposed Shetland Link

Given that the existing converter station at Spittal is 800MW it may be the case that an identical station at Kergord would give rise to a
lower cost and quicker delivery.

Question 7: What are your views on our minded-to position to conditionally approve the revised Final Needs Case? Specifically:
i) Do you agree with our proposal to approve a 600MW link subject to Ofgem being satisfied, by the end of 2020,
that Viking Energy Wind Farm is likely to go ahead?

Yes we support this position, provided that Ofgem, NGESO and SHE-T follow the CBA which clearly shows that the 600MW link can connect
at least 818MW of wind generation with constraint payments as the lowest cost scenario (even with no additional demand) and that the
SHE-T statement in 2.40 must therefore be rejected.
ii Do you have any views on the type of evidence we should to see that would confirm that Viking Energy Wind Farm is likely to
go ahead ?

We would expect Ofgem to have confirmation from the Board of Directors of Viking Energy.

iii Do you agree with the factors we have considered to reach our minded-to position

In their response to this consultation Ofgem should make it clear to SHE-T that the CBA shows that there is no case for a second HVDC link until at least 818MW generation has connected.

Yours Sincerely,