

Ikbal Hussain
Senior Manager, Commercial Interconnectors
Systems & Networks

The Office of Gas and Electricity Markets (Ofgem)
10 South Colonnade
London
E14 4PU

Wednesday, 15 July 2020

RE: Statutory consultation on proposed modifications to the standard conditions of the electricity interconnector licence and to the special conditions of the licences held by NGIL and NGESO

Dear Ikbal,

ElecLink Limited (“ElecLink”) welcomes the opportunity to respond to the consultation on proposed modifications to the standard conditions of the electricity interconnector licence and to the special conditions of the licences held by NGIL and NGESO.

This response is provided on behalf of ElecLink and is not confidential. ElecLink is constructing a 1000MW HVDC electricity interconnector between Great Britain and France.

ElecLink agrees with the proposed changes related to the CEP Electricity Regulation and believes that the changes accurately reflect the regulation and its principles.

ElecLink also agrees with the proposed changes related to the CACM Regulation but would like to get additional information on Condition 27. The licensee must submit a request setting out the proposed value for the ICP term and provide relevant information in accordance with paragraph 4 of Condition 27, including any other information as may be specified by the Authority. To ensure the licensee provides all required information in the request and avoid unnecessary exchanges between the licensee and the Authority, it would be appropriate for the Authority to provide some detailed guidance in this respect in a separate document.

In addition, it is stated in paragraph 6 of Condition 27 that *“following the cost assessment process, the Authority shall determine whether the licensee’s proposed values for the ICPn term is acceptable”*. ElecLink would like to highlight that, although in agreement with the principle, the Authority must ensure that all interconnectors are treated in a transparent and fair manner. The degree of ‘acceptability’ must be the same for all relevant parties. Additional guidance on the criteria used by the Authority to assess the proposed values would be welcomed.

If you have any queries regarding the response, please contact the ElecLink Regulation Team – regulation@eleclink.co.uk or Anais Main – anais.main@eleclink.co.uk.

Yours sincerely,

Anais Main

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