

## Offshore Coordination project

### Consultation feedback form

We launched our consultation on **30 September 2020** and it closes on the **28 October 2020**.

Please use this form to send in your written feedback. If you would like to feedback via this route. We are also working with stakeholders to receive verbal feedback. Please contact us if you would prefer to provide feedback verbally.

We would like to publish responses to our consultation following its closure. Please can you confirm whether you would like us to treat your response confidentially by selecting one of the options below: (delete those that do not apply)

- **Confidential – please do not share the feedback or company**
- **Confidential – you can publish the feedback without our name or sector included**
- **Confidential - you can publish the feedback without our name but you are welcome to identify which sector we come from**
- **Non-confidential – you can publish the full response**

*Throughout the consultation document we have asked some questions on our three reports that we would like your feedback on to shape our final documentation. These are below and do not need answering if you do not have views. If you would like to provide any other feedback, please feel free to do so.*

## Holistic Approach to Offshore Transmission Planning Report

Q1. Do you agree with our assessment of the key technology and system risk barriers coming from the Holistic Approach to Offshore Transmission Planning Report?

*We agree with the findings that high voltage direct current (HVDC) technology will play a key role in achieving the net zero targets for offshore wind. We also note the value that offshore infrastructure would add to the security of the Great Britain (GB) transmission system through diversion of north-south power flows from the onshore infrastructure. While we agree with the key technology assessments, we are of the view that the risk of delays in deployment of DC circuit breakers (DCCBs) by 2030 has not been adequately addressed. DCCBs are a key HVDC technology to facilitate the significant deployment of offshore wind in an integrated approach. Although the report acknowledges the existing barriers for DCCBs on limited standards and specifications it lacks clear steps to address the barriers to meet 2030 targets and beyond.*

*A sensitivity analysis which considers a scenario with limited deployment of DCCBs by 2030 would help to highlight the risk (if any) it may present to achieving net zero targets.*

Q2. Do you have any proposals on how to most effectively bring the technology to market for when needed?

*There is need to develop adequate technical capabilities in operation and maintenance of meshed offshore networks, including DCCBs, to match skills requirements for 2030 and 2050 targets. National Grid Electricity System Operator (ESO) may facilitate trial projects with transmission owners (TOs) and/or offshore project developers to support the deployment of novel grid technologies that would enable extensive technology deployment from 2030 onwards for integrated offshore networks.*

*We would like to see ESO's leadership in facilitating offshore coordination even for projects contracted to connect by 2030 to an extent possible within the current offshore regime. A considerable number of contracted projects are being developed by the same developer or same group owning multiple developer entities, which would make offshore coordination easier than otherwise.*

Q3. Do you have any additional evidence to inform the assessment we have made?

*None*

Q4. Do you have any further feedback on the report?

*None*

## **Cost-benefit Analysis Report**

Q1. Do you agree with our assessment of the costs and benefits?

*We welcome the initial findings on potential benefits from offshore coordination approach. While we agree that the use of aggregate infrastructure would reduce the number of onshore landing points, there is lack of clarity on the entity to develop the aggregate infrastructure, which in some cases would require anticipatory investment considering different development programmes between multiple offshore wind farm projects.*

*There is therefore a potential risk that committed projects, currently planned for point-to-point radial connections, may sterilise landing points by 2030 and affect the realisation of potential benefits by 2050.*

Q2. Do you have any other evidence to support or challenge the assessment made?

*Around 30GW of offshore wind is contracted to connect by 2030 as per the latest TEC Register dated 15 October 2020. We are of the view that if all of this capacity is connected through point-to-point radial connections, it may sterilise the onshore landing points, especially on the GB east coast. This may affect potential benefits from integrated offshore designs to meet 2050 targets despite meeting the 2030 target of 40GW, assuming all offshore wind projects contracted to connect by 2030 are delivered on time, in addition to the existing circa 10GW offshore wind generation.*

Q3. What do you see as the potential impact on the environment of these proposals, particularly the reduction in the number of assets and landing points?

*We anticipate a potential reduction in planning risks for both onshore and offshore transmission assets for TOs and project developers although the sheer volumes of renewable generation to be connected to meet net zero targets may still result in increased infrastructure activities in the coastal areas than ever before.*

Q4. Do you have any further evidence on the potential social and community impacts of these proposals? We would particularly welcome responses from local authorities on this question.

*None*

Q5. Where do you see value for further work to build on and test these findings? Either from the proposed list or beyond?

*As indicated in our responses to Q1 and Q2 above, we would like to see an assessment on how offshore coordination would work if committed projects up to 2030 proceed as single radial connections. A sensitivity analysis which considers a scenario with radial committed projects up to 2030 would help to highlight the risk (if any) it may present to achieving net zero targets.*

## Offshore Connections Review Report

Q1. Do you think that if the areas we are highlighting were improved, that the ability to coordinate projects would be significantly increased?

*We agree with the concept of regional CIONs as we believe it would support offshore integration. However, for the concept to be effective it needs to address issues around anticipatory investment for shared use offshore assets, including associated regulatory framework. It would also be helpful to learn lessons from the current framework on why coordination has not been done and what can be done to remove those barriers.*

*We also support the proposals to package connection application offers with other processes like seabed leasing and codification of the CION into the CUSC. This would help to minimise uncertainty for offshore project development.*

*For each area of improvement identified, we would like to see the degree of socialisation and associated benefits.*

Q2. Do you think we have missed anything in our offshore connections review that would add value and increase coordination?

*Considering that offshore connections are affected by onshore transmission system capacity, you may further consider whole transmission system approach to the connections review to ensure that the offshore coordination delivers the intended targets.*

*In addition, uncertainty exists for onshore shared use infrastructure asset development for contracted generation. This occurs when key project milestones have not been met to allow network companies to progress with the pre-construction stage of the shared use assets projects which are enabling works. There is a risk that this uncertainty may exist for integrated offshore networks where the shared offshore assets are developed by a third party, without appropriate funding mechanism for early stage project development. We would like to see the connections review addressing this uncertainty in order to provide project developers with clarity for connection timescales.*

*We would also like to see how the connection review can facilitate an increased offshore transmission owner (OFTO) role in the design, planning and delivery of offshore networks similar to the onshore approach where TOs lead the development of*

*transmission infrastructure assets in collaboration with the ESO. The connection review should provide clarity on how an early-OFTO model would work with competition and minimal delay risk. This would support whole system approach and provide consistency in transmission system development and certainty for offshore developers.*

Do you have any other feedback, if so please add below. Many thanks for taking the time to provide written feedback. When we publish our final documentation, we will let you know what we have done with the feedback and how it has shaped our work.