

Workgroup Consultation Response Proforma

CM094: Amendment to Bi-annual estimate provisions

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to stcteam@nationalgrideso.com by **5pm on 14 February 2024**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Milly Lewis milly.lewis@nationalgrideso.com or stcteam@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Sarah Graham	
Company name:	Ocean Winds	
Email address:	sarah.graham@oceanwinds.com	
Phone number:	07464675593	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration)

For reference the Applicable STC Objectives are:

- efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act
- development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission
- facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity
- protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees
- promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.
- facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;
- compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitate the Applicable Objectives?	<p>Mark the Objectives which you believe the solution better facilitates:</p> <p>Original <input type="checkbox"/>A <input checked="" type="checkbox"/>B <input checked="" type="checkbox"/>C <input type="checkbox"/>D <input type="checkbox"/>E <input checked="" type="checkbox"/>F <input type="checkbox"/>G</p> <p>Ocean Winds supports the Original Proposal as this better facilitates STC objectives. The modification is expected to substantially enhance the number of customer connections that become feasible and the number of projects being able to go ahead. The imposition of steep initial securitisation demands in grid connection agreements poses an enormous obstacle to entry and risks impacting offshore wind deployment scenarios. If this modification was not taken forward, certain projects may face abandonment.</p> <p>Facilitating the involvement of additional market players, particularly those hindered by the hefty financial load of early securitisation requirements will facilitate competition among generators and better facilitate objective C.</p> <p>Facilitating competition and access to the NETS also serves towards delivery of STC objectives B and F.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>
3	Do you have any other comments?	<p>It is important that any decision made on this proposal provides clarity concerning the implementation of amendments introduced by CM094 in relation to any interaction with the CUSC and to current agreements, especially in those instances where liabilities have been deemed "fixed".</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/>Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>

Specific Workgroup Consultation questions		
5	Do you agree that the Construction Approval should be based on the needs case approval rather than funding approval?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
6	Do you agree that it's non material when customers contract?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
7	Do you agree that the next security period is a reasonable time for the change?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
8	Is it clear that prior to Construction Approval (needs case) that customers will still need to provide securities for construction works?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
9	Does the legal text satisfy the intent of the modification in improving the security process in a transparent way?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No We have not conducted a legal review of the proposed text but support the intention of the text based on our understanding of the consultation proposal.