

31st March 2017

Dear Mr Place,

RenewableUK is the trade and professional body for the wind, wave and tidal energy industries. Formed in 1978, and with more than 400 corporate member companies, RenewableUK is the country's leading renewable energy trade association.

Ofgem's vision for the future arrangements of the system operator includes a clear focus upon industry frameworks supporting innovation. In line with this ambition, we propose that a working group is established to review the National Electricity Transmission System Security and Quality of Supply Standard (SQSS) Chapter 7 on connecting offshore wind farms.

The SQSS chapter was written at a significantly less mature stage in the offshore wind industry's development. As a result, design variations, intended for exceptional circumstances, are currently sought on a regular basis for design practices that are standard practice within this industry – unnecessarily increasing project risk and development programmes whilst also constraining the industry's ability to innovate and reduce costs. This and the urgency of reviewing this matter are highlighted by a number of recent modifications; including GSR014, GSR019 and GSR020 which were not included in recent updates to Chapter 7 made when version v2.3 of the SQSS was issued on 8th February 2017.

We consider the principal role of a working group would be to update the standard to reflect recent developments and to review how flexibility and innovation can be more appropriately accommodated in the chapter, thus bringing the standard more in line with the development of the sector. This work should reflect and be sure to not bring uncertainty to decisions to date. Similarly, it is important that this review is carried out in a timely manner to avoid unnecessary uncertainty.

There is significant support for this review among RenewableUK's membership. These companies include DONG Energy, innogy, JDR Cables, Mainstream RP, Scottish Power Renewables, Siemens and the ORE Catapult.

Kind regards,



Emma Pinchbeck
Executive Director