



**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on National Grid Electricity Systems Operator's Deadline 3 Submission

Applicant: East Anglia TWO and East Anglia ONE North Limited

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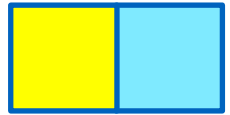
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Applicable to East Anglia ONE North and East Anglia TWO



Revision Summary

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01	13/01/2021	Rich Morris	Lesley Jamieson / Ian Mackay	Rich Morris

Description of Revisions

Rev	Page	Section	Description
01	n/a	n/a	Final for Deadline 4 Submission



Table of Contents

1	Introduction	1
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Glossary of Acronyms

NGESO	National Grid Electricity Systems Operator
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Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO project / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO project / East Anglia ONE North project.



1 Introduction

1. This document presents the Applicants' comments on National Grid Electricity Systems Operator's Deadline 3 submission (REP3-110).
2. This document is applicable to both the East Anglia ONE North and East Anglia TWO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.



Table 1 Applicants' Comments on NGESO's Deadline 3 Submission

ID	Written Representation	NGESO Response	Applicants' Comments
Compulsory Acquisition Hearing 1			
1.	(i) Please respond in writing to points raised under item 3 in relation to linked NSIP's and the justification for the applicants to be applying for the overhead line NSIP's.	NGESO refers this question to NGET	Noted
	(ii) Please address possible circumstances in which connection proposals (over and above the currently proposed developments) may become additional and/or dominant users of the transmission system connection;	As operator of the national electricity transmission system, NGESO is the party that parties apply to when they want to connect to/use the system. Offers for connection/use have to be made by NGESO as required by its transmission licence. NGESO doesn't control in any way who and when a party can apply. In relation to connection applications for offshore wind farms the process for identifying the connection location is described in response 2d (iii) below. On the NGESO website there is a list of applicants in a signed connection position.	Noted
Issue Specific Hearing 2			
3	Under Agenda Item 2(d) the examining authority asked for: (i) the clearest position of public knowledge (not commercially confidential information) around projects proposed to connect in the Leiston Area.	(i) This question is addressed under question 9(ii) below. (ii) This is addressed in response to question 8(ii) below (iii) The Connection and Infrastructure Options Note (CION) process (a licence	(i) Noted (ii) Noted (iii) The site selection process was presented and discussed at Issue Specific Hearing 2 and is presented in detail within Chapter 4 of the ES (APP-052).



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	<p>(ii) There was also discussion around whether a connection in the Leiston Area means Friston.</p> <p>(iii) Also, why Friston was chosen (including why a brownfield site was not selected).</p>	<p>requirement delivered through STCP 18-1 Issue 009 Connection and Modification Applications) is used to identify a connection location following an application for a connection agreement. This industry approved procedure documents the role and responsibilities of the parties responsible for offshore grid connections, who comprise the Developer (in this case the Applicants), the Transmission Owner (TO) (in this case NGET) and NGESO (in its role as System Operator (SO)). The CION is a collaborative process resulting in a preferred point of connection to the transmission system to inform the connection offer and scope of the transmission works. The CION records the output of the work between the Developer, TO and NGESO to identify the overall most economic, efficient and coordinated connection option. Planning and environmental considerations are inherent in the process as the Developer must accept the connection offer and following the CION process the option identified must be feasible in terms of consenting and deliverability. All parties to the CION are mindful that the necessary consents must be subsequently obtained</p>	



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		<p>through the planning process to deliver the identified option.</p> <p>Parties to the CION process are also subject to amenity duties under Schedule 9 of the Electricity Act 1989.</p> <p>In this case, the Applicants led on site selection within the Leiston area, accepted the connection offer, and are taking on responsibility to obtain consents. As such, NGENO consider that the Applicants are best placed to justify to the ExA the connection proposal from a planning perspective (both alone and in the context of the Applicants' projects as a whole), including the consideration of brownfield options within the Leiston area. NGET has a technical input in the CION process including identification of connection options, which led ultimately to the output of the CION process identifying the Leiston area for the connection.</p>	
	<p>3 (a) The choice to make a new onshore connection, as opposed to utilising/expanding existing connections at Bawdsey [and Sizewell or Bramford] or creating new connections elsewhere</p>	<p>The response to Action 3, agenda item 2d part (iii) should address this question.</p>	<p>The site selection process was presented by the Applicants and discussed at Issue Specific Hearing 2 and is presented in detail within Chapter 4 of the ES (APP-052).</p>



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	3(c) Justification for the proposed cable alignments – was this as a result of the chosen landfall and substation locations? What rationale was used in the decision-making process of routes or ways to link up the chosen locations?	NGESO refers this question to the Promoter.	The proposed cable routing was presented by the Applicants at Issue Specific Hearing 2 as part of the site selection process
4	4(b) Design and impact of the proposed substations/transmission systems connections, including the proposed National Grid substation and connections to the grid, specifically in terms of: a. Overarching siting and design issues b. Landscape and Visual Impact, including upon PRowS c. Historic Environment d. Achieving good design	NGESO refers this question to the Promoter.	The topics outlined under 4(b) were presented by the Applicants at Issue Specific Hearing 2 Onshore Siting, Design and Construction and is presented in detail within Chapter 4 of the ES (APP-052).
8	<p>(i) Explain why the proposed connection to transmission system at Friston was chosen and analysis of adverse effects that took place to inform the decision from the CION and related RAG (Red, Amber, Green) processes.</p> <p>(ii) Explain why, if there is a need for a strategic connection hub in the Leiston area accommodating multiple connections in addition to the connections for the proposed developments, entities in the National Grid Group of companies have not taken the lead in identifying its location and seeking a planning</p>	<p>(i) The connection point is the output of the CION process as explained in Action 3, agenda item 2d part (iii). Further explanation of the RAG status will be covered in the promoter Action 14</p> <p>(ii) It is not proposed to develop a strategic connection hub at Leiston. Under the current regulatory framework system reinforcements are generally identified by NGESO and transmission owners in an incremental manner as offers are made, taking opportunity for efficiencies where</p>	Noted



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	<p>approval/development consent in their own right.</p> <p>In the event that the decision to connect at Friston was made solely or principally by the Applicants, explain your view of the proposal. Does leadership site selection and initial development by the applicants raise any relevant implication or risks for your strategy and purpose in seeking to develop a transmission connection location for multiple uses at or around Leiston.</p>	<p>practicable, rather than on an anticipatory basis of future need.</p> <p>(i) NGESO does not have a strategic plan for connections around Friston. Each application to NGESO is assessed on its own merits and where applicable NGESO will aim to coordinate network development across various parties. See response to question 2(d)(iii) for explanation of the CION process which is intended to identify the connection location following an application for a connection agreement.</p>	
8	<p>(i) Explain the planning assumptions in relation to (a) a connection at Leiston; and (b) the development of a strategic connection hub in the Leiston area in the next 10 years.</p> <p>(ii) Outline potential projects requiring connection and their planning and legal status (including Nautilus, Eurolink, Five Estuaries, North falls and SCD1 and 2),</p> <p>(iii) Explain the information held on the NGV website appearing to commit to connecting several project to a connection at Friston.</p>	<p>(i) (a) see response to 2(d)(iii) above. (b) There is no planned strategic connection hub at Leiston and so no planning assumptions have been made in respect of this.</p> <p>(ii) For details of the planning and legal status of the projects generally it may be better to approach the Applicants. From NGESO's viewpoint our understanding of the current status is as follows and the following is an extract from NGESO's website as of 09/12/2020.</p> <ul style="list-style-type: none"> • Nautilus – the connection contract is signed and the connection point is at 	<p>(i) Noted</p> <p>(ii) Noted</p> <p>(iii) Noted</p> <p>(iv) Noted</p> <p>(v) It is the Applicants view that there are no projects at a sufficiently developed stage to allow a cumulative assessment to be undertaken. None of the projects listed at (ii) have submitted a Scoping Report.</p>



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	<p>(iv) Confirmation of location of the proposed Leiston Connection point. Is it one and the same as the Applicants proposed connection point at Friston? If more than one point of physical connection is envisaged then please make this clear.</p> <p>(v) Please identify where there is sufficient information to allow a cumulative impact assessment to be undertaken of adverse effects of projects likely to be planned to be connected at Friston. When will this assessment be carried out?</p>	<p>Leiston 400kV substation. The project status is currently 'Scoping'</p> <ul style="list-style-type: none"> • Eurolink – the connection contract is signed and the connection point is at Leiston 400kV substation. The project status is currently 'Scoping' • Five Estuaries – the connection contract is signed and the connection point is Galloper North 132/33kV. The project status is 'currently awaiting consents' • North Falls – the connection contract is signed and the connection point is Greater Gabbard Extension Offshore Platform. The project status is 'scoping'. <p>NGESO assumes the reference is to NOA reinforcement SCD1 & SCD2. In the 2019/20 Network options assessment SCD1 was given a proceed signal and SCD2 was put on hold. This decision is referencing spend between April 2020 and April 2021. The needs case is investigated annually. The ExA may wish to note the role and status of the NOA, for example as explained section 1.4 "The NOA cannot [...] provide recommendations for customer connection. The NOA only recommends the most economic reinforcement to</p>	



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		<p>resolve wider network issues.” download (nationalgrideso.com)</p> <p>(iii) NGESO cannot comment on information appearing on other party’s websites and this question should be addressed to NGV. NGV, although part of the National Grid group, is a separate legal entity and in terms of connection applications is treated in the same manner as any other applicant for connection and use of system. NGESO’s transmission licence requires it to act in a non-discriminatory manner.</p> <p>(iv) NGESO refers this question to NGET NGESO refers this question to NGET and SPR</p>	
12	Specification and capacity of the Existing Transmission system OHL's out of Sizewell.	NGESO refers this question to NGET.	Noted
15	NG ESO are asked to supply relevant references supporting the operation of the CION process.	See response to Question 2(d)(iii) above. NGESO understands that a redacted version of the CION has been provided to the planning inspectorate The ExA is also referred to the following CION guidance note of 2018: Connection and Infrastructure Options Note (CION) Process Guidance Note - Issue 004 (nationalgrideso.com)	Noted



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16	Reference was made in the hearings (by Counsel for SASSES) to the duties on licensed bodies under s9 and sch 9 of the Electricity Act 1989 (as amended) please set out your response to these duties in terms of their applicability and (where applicable) your siting and design response to them when making siting and design decisions relating to onshore infrastructure. Specifically provide your response in relation to Schedule 1(1) and equivalent policies in NPS EN-5.	See response to question 2(d)(iii) above.	Noted