From: Vincent (ESO), Marc

To: East Anglia ONE North; East Anglia Two

Cc: Greenhalgh (ESO), James

Subject: NGESO Response to ISH2 and CAH1 Actions.

Date: 15 December 2020 17:07:47

Attachments: image001.png

image001.png NGESO Responses to ExA for EA1 & EA2 final version .pdf

FAO RYND SMITH.

Please see the attached responses from NGESO to the published actions/questions from ISH2 and CAH1 in relation to the EA1 and EA2 planning application.

If you have any further questions NGESO is more than happy to help.

Kind regards Marc Vincent

NGESO Responses to Compulsory Acquisition Hearing 1 (CAHs1)

- Application by East Anglia ONE North Limited for an Order Granting Development Consent for the East Anglia ONE North Offshore Wind Farm.
- Application by East Anglia TWO Limited for an Order Granting Development Consent for the East Anglia TWO Offshore Wind Farm.

Actions arising from the Compulsory Acquisition Hearings 1 (CAHs1) held virtually on Tuesday 1 December 2020.

NGESO Provides the following response(s) to CAHs1

Action 2	(i)	Please respond in	NGESO refers this question to NGET
		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.	
	(ii)	Please address	As operator of the national electricity transmission
		possible circumstances	system, NGESO is the party that parties apply to
		in which connection	when they want to connect to/use the system. Offers
		proposals (over and	for connection/use have to be made by NGESO as
		above the currently	required by its transmission licence. NGESO doesn't
		proposed	control in any way who and when a party can apply.
		developments) may	In relation to connection applications for offshore wind
		become additional	farms the process for identifying the connection
		and/or dominant users	location is described in response 2d (iii) below. On
		of the transmission	the NGESO website there is a list of applicants in a
		system connection;	signed connection position.

NGESO Provides the following response(s) to ISHs2:

Action 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.

(ii)

There was also discussion around whether a connection in the Leiston Area means Friston. (iii)

Also, why Friston was chosen (including why a brownfield site was not selected).

(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 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 through the planning process to deliver the identified option.

Parties to the CION process are also subject to amenity duties under Schedule 9 of the Electricity Act 1989. 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, NGESO 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 The response to Action 3, agenda item 2d part (iii) 3 (a) The choice to make a new should address this question. onshore connection, as opposed to utilising/expanding existing connections at Bawdsey [and Sizewell or Bramford] or creating new connections elsewhere. 3(b)NGESO refers this question to NGET and the The specific need for, and Promoter justification of, locations of landfall at Thorpeness and substations/transmission systems connections, including the proposed National Grid substation and connections to the grid at land north of Friston. To include details of the strategic decisionmaking process for the proposed locations and their generation

	capacities – why were the sites	
	chosen, and in what order?	
	3(c)	NGESO refers this question to the Promoter
	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?	
	4(b)	NGESO refers this question to the Promoter
	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	
Action 8	(i)	(i)
	Explain why the proposed	The connection point is the output of the CION
	connection to transmission	process as explained in Action 3, agenda item 2d
	system at Friston was chosen and	part (iii). Further explanation of the RAG status will
	analysis of adverse effects that	be covered in the promoter Action 14
	took place to inform the decision	(ii)
	from the CION and related RAG	It is not proposed to develop a strategic connection
	(Red, Amber, Green) processes.	hub at Leiston. Under the current regulatory
	(ii)	framework system reinforcements are generally
	Explain why, if there is a need for	identified by NGESO and transmission owners in an
	a strategic connection hub in the	incremental manner as offers are made, taking
	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 an seeking a planning approval/development consent in their own right.

(iii)

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.

opportunity for efficiencies where practicable, rather than on an anticipatory basis of future need.

(iii)

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.

Action 9

(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.

(ii)

Outline potential projects requiring connection and their planning and legal status (including Nautilus, Eurolink, Five Estuaries, North falls and SCD1 and 2),

(iii)

Explain the information held on the NGV website appearing to commit

- (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.

(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.

 Nautilus – the connection contract is signed and the connection point is at Leiston 400kV substation. The project status is currently 'Scoping'

to connecting several project to a connection at Friston.

(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.

(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?

- 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'.

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 recommends the most economic reinforcement to resolve wider network issues." download

(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-discrimatory manner

(iv)

		NGESO refers this question to NGET
		(v)
		NGESO refers to NGET and SPR.
Action 12	Specification and capacity of the	NGESO refers this question to NGET
	Existing Transmission system	·
	OHL's out of Sizewell.	
Action 15	NG ESO are asked to supply	See response to Question 2(d)(iii) above.
	relevant references supporting	NGESO understands that a redacted version of the
	the operation of the CION	CION has been provided to the planning
	process.	inspectorate
	p. cocco	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)
		<u>trianorialgriaoco.com/</u>
Action 16	Reference was made in the	See response to question 2(d)(iii) above.
7.00.011 10	hearings (by Counsel for SASES)	200 100p01100 to quoditori 2(a)(iii) abovo.
	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	
i .		
	NPS EN-5.	