



**Offshore Wind Farms**

**EAST ANGLIA ONE NORTH**

**PINS Ref: EN010077**

**and**

**EAST ANGLIA TWO**

**PINS Ref: EN010078**

**SEAS Response to OFGEM at  
Issue Specific Hearing, 2 Dec 2020  
Deadline 3 – 15 December 2020**

**SEAS (Suffolk Energy Action Solutions)**

**Unique Ref. No. EA1(N): 2002 4494**

**Unique Ref. No. EA2: 2002 4496**



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## DEADLINE 3

### SEAS Response to OFGEM at Issue Specific Hearing, 2 Dec 2020

#### ISH2 – 2 December – AM Session 2 – OFGEM

SEAS would like to register its disappointment regarding Ofgem's response to the questions posed by the Examiners regarding the timing for alternative solutions to current plans for wind energy infrastructure and the BEIS Review.

SEAS believe that Ofgem's oral responses at the Open Floor Hearings were dissonant with the objectives of the BEIS Review. Neil Copeland, Ofgem, stated that "*these projects are probably too soon for our policy changes to have an effect*". Yet, the Applicant is asking for a seven year commencement window, so we could be looking at 2027/28 before these projects might even begin and therefore it would be reasonable to conclude that they may not be connected until around 2030. These projects then clearly fall within the time frame for the medium-term workstream of the BEIS Review. That is, they clearly fall within the following medium-term objectives;<sup>1</sup>

- identify and implement changes to the existing regime to facilitate coordination in the short-medium term
- assess the feasibility and costs/benefits of centrally delivered, enabling infrastructure to facilitate the connection of increased levels of offshore wind by 2030
- explore early opportunities for coordination through pathfinder projects, considering regulatory flexibility to allow developers to test innovative approaches
- focus primarily on projects expected to connect to the onshore network after 2025

The overarching objective of the BEIS Review is to "*ensure that the transmission*

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<sup>1</sup> <https://www.gov.uk/government/publications/offshore-transmission-network-review/offshore-transmission-network-review-terms-of-reference>



*connections for offshore wind generation are delivered in the most appropriate way, considering the increased ambition for offshore wind to achieve net zero. This will be done with a view to finding the appropriate balance between environmental, social and economic costs".<sup>2</sup> We still believe that there are alternative sites more suited to industrialisation and that BEIS is now obliged to factor in the issues relating to Biodiversity and the environment, not as an after-thought, but as an equal factor to the economic costs.*

Given the recent increase in ambitious targets for wind energy (40GW by 2030, not 30GW), BEIS has every reason to step change now and to reassess how to deliver that greater amount of wind energy. It would be a shameful dereliction of duty if no meaningful change came into effect until after 2030, by which time, according to government targets, 40GW of wind energy would already be connected to the Grid. EA1N and EA2 clearly must be included in the BEIS Review.

Finally and perhaps most importantly, we would like to go back to Chris Wheeler's question. He asks Ofgem,

*"that if ScottishPower were willing, they could coordinate their EA1N and EA2 wind farms and deliver the power from those two wind farms together to a single site using HVDC, rather than using HVAC. This would facilitate a connection to a site, which was far distant from the pristine site that is currently being considered. And what I would like to do is for the Ofgem representative to comment on whether or not ScottishPower, bearing in mind they have control over both projects, (and) were willing to do that, whether the current regime could support them in doing so".*

Ofgem's response was,

*"Indeed, with regard to the comment from Mr. Wheeler, there is scope for the development of shared assets and that can be considered within the existing regime.*

*"There are perhaps commercial disincentives to how anticipatory investment might*

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<sup>2</sup> <https://www.gov.uk/government/publications/offshore-transmission-network-review/offshore-transmission-network-review-terms-of-reference>



*be treated at the moment, which might stop a developer from developing infrastructure in the way he suggested. And those are some of the things that we are thinking about in terms of that tactical work stream, which I referenced".*

If this is indeed possible then why is Chris Wheelers proposal not being given more serious consideration.

*"My proposal is that by linking the outputs of the proposed East Anglia 1 North and East Anglia 2 projects the combined power could reasonably be delivered with HVDC using just one cable trench with three conductors and one converter station. And given the long distance capability of HVDC that converter station, which might be 24m high, could be sited on brownfield land, for example at Bradwell or perhaps Bramford, where a suitable site is almost certainly available. And the Applicant may even have residual consent under their East Anglia 1 DCO for a cable route to Bramford." <sup>3</sup>*

We have witnessed in the Westminster debate on 5 November 2020 that there are an increasing number of MPs calling for the necessary legislation and reform to remove these barriers and “disincentives” without delay, indeed with a sense of urgency (“maximum thrust”).

As we have stated in previous Written Representations, we know from the CEO of Elia, Didier Wiot, that there are excellent offshore solutions using HVDC technology which can be implemented in the way that Chris Wheeler is promoting and that Bramford is an obvious candidate choice for Grid connection, in view of the agreed plans for EA1 and EA3.

What happened to Ofgem's vision "*We will become more adaptive in the way we work and in our regulatory approaches in order to take decisions in the face of significant uncertainty.*" Oh, but in 10 years time ...

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<sup>3</sup> <https://www.suffolkenergyactionsolutions.co.uk/news/chris-wheeler-open-floor-hearings-3-friday-9-october>