



Offshore Wind Farms

EAST ANGLIA ONE NORTH

PINS Ref: EN010077

and

EAST ANGLIA TWO

PINS Ref: EN010078

**SEAS response to
SPR's Deadline 4 Project Update
ISH4, ACTION POINT 2
Deadline 4 – 3 February 2021**

SEAS (Suffolk Energy Action Solutions)

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

Unique Ref. No. EA2: 2002 4496



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DEADLINE 4 SUBMISSION

SEAS RESPONSE to

SPR's Deadline 4 Project Update

ISH4, ACTION POINT 2

SEAS would like to respond to ScottishPower Renewables Deadline 4 Project Update Note with regard to Section 1.5 on Grid Connection Dates.

We quote from the above document (page 5):

"In 2019 the Applicants reviewed the Projects' delivery programme in order to identify opportunities to bring forward their delivery programme and assist the UK in deploying much-needed renewable energy capacity as soon as possible. Towards the end of 2019, the Applicants engaged with National Grid regarding the potential to revise the Projects' grid connection dates. This facilitated the submission of an application to National Grid to modify the East Anglia TWO project's Connection Agreement in December 2019, and towards the end of 2020 the East Anglia TWO project's Connection Agreement was amended to reflect a grid connection date of November 2024.

An application to modify the East Anglia ONE North project's Connection Agreement was submitted to National Grid towards the end of 2020. East Anglia ONE North Limited await the outcome of the application. Should a modified connection date be acceptable to both parties, it is anticipated that the East Anglia ONE North project's Connection Agreement will be modified in mid-2021."

This timetable, also noted by [NGESO](#) and [NGET](#) in their latest Written Submissions, is a **major** change from that submitted on December 15th 2020 by SPR in their document [Submission of Oral Case, Compulsory Acquisition Hearing 1 on 1st December 2020: The Applicant's Strategic Case](#).

We quote from the above document (page 20):

The seven-year time limit is requested in order to maximise the window for the Projects to commence construction and exercise compulsory acquisition powers, particularly in light of the uncertainties associated with the current Contracts for Difference support mechanism regime the industry operates in, which is outwith the control of the Applicants.

Taking into account project funding, Final Investment Decisions and contracting (all post CfD activities), a seven-year time limit is appropriate in order to ensure sufficient time for the Projects to participate in further CfD allocation rounds, should they not be successful in the immediate allocation rounds post consent.

It is possible that the Projects may not be able to participate in the CfD Allocation Round 4 in late 2021. A realistic assumption is that the next allocation round might be in late 2023. Based on that an example timeline is set out below:

Q4 2023 – CfD Allocation Round 5 opens

Q2 2024 – CfD Allocation Round 5 awarded

Q4 2025 – CfD Significant Financial Commitment milestone met / Final Investment Decision

Q2 2026 – Onshore construction commences (the Applicants have assumed this will commence six months after the Financial Investment Decision to allow for placement of contracts and mobilisation)

Q2 2028 – Onshore construction completes

Q4 2028 – 7 year compulsory acquisition rights period elapses (assuming that the Projects obtain consent in October 2021).

This is based on the assumption that CfD Allocation Round 5 will open two years after CfD Allocation Round 4. There is no obligation for allocation rounds to be held every two years and therefore this period could be longer. An example of this is CfD Allocation Round 4 which is being held two and a half years after CfD Allocation Round 3.

SEAS believes this recently altered timetable for EA2 is unrealistic, disingenuous and environmentally negligent.

As SPR acknowledges this project may well miss the 2021 CfD Allocation Round 4, which will immediately throw this new timeline out. All contracts will need to be put into place which takes time. It is worth mentioning that whilst Siemens Gamesa Renewable Energy Limited has been selected as the preferred bidder by SPR to supply and install the turbines for these Projects, they currently have a lawsuit filed against them which if successful, could interfere with the construction of these projects.¹

The Applicant claims that this new timetable was incentivised by their desire to "[assist the UK in deploying much-needed renewable energy capacity as soon as possible](#)". Similarly [Ofgem](#), in their latest Written Submission, assert, "*neither we nor Government want to act as a barrier to developments that are already in flight. This could prevent the achievement of Government's targets*". Let us be clear, the governments 2030 wind energy targets enshrined in the [Energy White Paper: Powering Our Net Zero Future](#) are to build back greener, to work towards net zero emission targets and to fight climate change. This White Paper and the Offshore Coordination Phase 1 Final Report clearly and unequivocally state the case that radial point to point projects, like those currently proposed for EA1N and EA2, lead to a far greater environmental impact. If SPR are genuinely committed to the government's 2030 targets of reducing carbon emissions, they should be pursuing a timeline that would result in the least environmental damage. That is a longer term timetable with the opportunity to benefit from the emerging policy of offshore integration as outlined in the Energy White Paper and BEIS Review. There are 9 years to go until the government's 2030 targets which SPR claim they are working towards. There is time to get this right. Following on from the Offshore Transmission Network Review,

¹ <https://renewablesnow.com/news/analysis-ge-files-uk-patent-lawsuit-against-sgre-in-attempt-to-derail-east-anglia-three-hornsea-two-729052/>



and taking stock of the Energy White Paper, there is clearly a better timeline to reduce adverse impacts and meet the Government's key decarbonisation objectives.

To conclude, the sudden presentation of what seems to be an unworkable timetable which contradicts all past timing Representations brings into question SPR's motivations. We believe this timetable has been brought to the table for two reasons:

1. to convince decision makers that these projects are too far advanced to engage with the BEIS Review Pathway Projects and the emerging government policy of the Energy White Paper, and
2. to put pressure on decision makers to consent to this Application promptly to meet the 2021 CfD Allocation.

It draws into question SPR's credibility and integrity; we have been left with the feeling that they will say anything to get the outcome that they would like. Regardless of their motivations, we believe that SPR's new timetable for EA2 should be called into question by the ExA on the basis that it does not provide the best solution to meet the government's overarching decarbonisation objective as set out in the government's Energy White Paper.

End