



SPR EA1N and EA2 PROJECTS

DEADLINE 10 – RESPONSES TO APPLICANTS COMMENTS ON SASES D8 SUBMISSIONS

Interested Party: SASES PINS Refs: 20024106 & 20024110

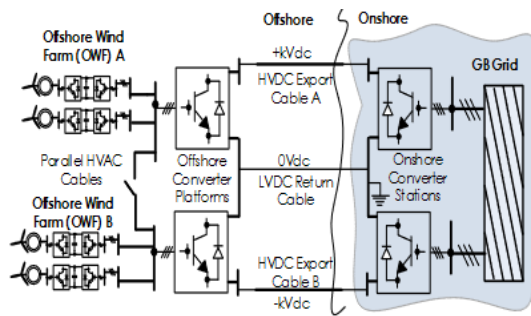
Date: 6 May 2021 Issue: 1

INTRODUCTION

1. The following comments are made on the Applicants Responses (REP9-013) submitted at D9 to SASES D8 submissions to which SASES has only responded by exception.
2. The fact that SASES has not responded to any particular comment made by the Applicants does not mean that SASES agrees with the comment.

2.1 SASES COMMENTS ON APPLICANTS D7 RESPONSES TO SASES D5 SUBMISSIONS

3. To clarify the comments below are on the Applicants' comments submitted at Deadline 9 on SASES' comments submitted at Deadline 8 on the Applicants' responses submitted at Deadline 7 on SASES submissions which were submitted at Deadline 5.
4. For obvious reasons there seems little point in perpetuating this exchange other than to observe that the Applicants' comments are not drafted with the clear purpose of clarifying or informing but rather to obfuscate and deflect. The majority of SASES comments are in respect of the comparison with the existing substation site at Bramford and in addition there is a comment on the Leiston airfield site. These relate to the topic of alternatives.
5. In addition with regard to the Applicants' comment on the BEIS OTNR Pathfinder Clarification note submitted by SASES at Deadline 5 please note SASES submitted an Updated Pathfinder Clarification Note at Deadline 9 (REP9-076) and awaits the Applicants' comments on that note. In the interim SASES points out that the argument made by the Applicants in their comment to the effect that HVDC Bipole is not applicable to wind farms then Figure 3-13 from page 38 of <https://www.nationalgrideso.com/document/182931/download> (part of the NGESO Offshore Coordination report) shows as the bottom left example the configuration that SASES has in mind, with clear notation as to Offshore Wind Farms being connected and the use of three cables for offshore to onshore connection. SASES would expect the onshore converter stations to be located together on one site and the offshore platforms might be combined.



6. In addition SASES observes that the comment which the Applicants have made on the Rt Hon Dr Therese Coffey's submission (REP9-026) at ID4 is misleading. The applicants state

“there is currently a cap on project size for Contracts for Difference (CfD) auctions”

7. It is understood that this cap is 1.5 GW therefore given these projects are a maximum of 900 MW and 800MW respectively then they are well within the CfD cap.

2.2 ISH11 SUBMISSION - FLOOD RISK AND DRAINAGE

8. SASES made a further flood risk submission at Deadline 9 (REP9-080) and awaits the Applicants' comments on this submission before responding.

2.3 ISH12 SUBMISSION - NOISE

9. SASES made a further noise submission at Deadline 9 (REP9-082) and awaits the Applicants' comments on this submission before responding.

2.5 DRAFT DCO

10. SASES made a further submission on the draft DCOs at Deadline 9 (REP9-079) and awaits the Applicants' comments on this submission and the ExA's commentary on and/or schedule of changes to the dDCOs before responding.

2.6 CAH3 SUBMISSION

11. SASES made a further submission in respect of CAH3 at Deadline 9 (REP9-077) and awaits the Applicants' comments on this submission before responding.

2.9 COMMENTS ON RESPONSES TO ACTION POINTS

12. ID 1 – The Applicants' comment is an example of obfuscation and deflection. Action Point 10 related to the operational noise requirements in the DCO not construction issues. SASES commented in its submission on Noise at Deadline 9 (REP9-082) on the Applicants' non-compliance with Action Point 10.