

From: [NectonSubstationAction Messenger](#)
To: [Norfolk Boreas](#)
Subject: Vanguard and Boreas Connection Points Deadline 13
Date: 16 July 2020 16:57:05

Dear ExA

You asked me to send you this after I mentioned it at the Necton OFH. This puts a whole new slant on the magnitude of the problem, and may be useful information.

“The Electricity Act 1989 requires National Grid, when formulating proposals, to be efficient, coordinated and economic whilst also having regard to the environment. When the development being connected is offshore, both the offshore and onshore aspects need to be considered in that evaluation too.”

References:

- A. National Grid Letter (30th October 2015) covering Connection & Infrastructure Options Note (CION) process effective 4th March 2015.
Link - <https://www.nationalgrid.com/sites/default/files/documents/43631-Connection%20and%20Infrastructure%20Options%20Note%20%28CION%29%20Process%20Guidance%20Note%20-%20Issue%20003.pdf>
- B. Ofgem Integrated Transmission Planning Regulation (ITPR) Final Conclusions – 17th March 2015.
Link - https://www.ofgem.gov.uk/sites/default/files/docs/2015/03/itpr_final_conclusions_decision_statement_publication_final.pdf
- C. Norfolk Vanguard & Norfolk Boreas– Pre-ExA Document & Covering Letter dated October 2018 - Strategic Approach to Selecting a Grid Connection Point.
Document EN010079-002147
Link - <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-002147-Additional%20Submission%20from%20Vattenfall%20-%20Strategic%20Approach%20to%20Selecting%20a%20Grid%20Connection%20Point%20and%20Cover%20Letter.pdf>
- D. Norfolk Boreas (Only) –
Document EN010087-000712
Link - <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010087/EN010087-000712-6.3.4.3%20Environmental%20Statement%20Appendix%204.3%20Strategic%20approach%20to%20selecting%20a%20grid%20connection%20point.pdf>

The regulation for the connection point process is at Reference A – Connections & Infrastructure Options Note (CION) which is governed by Ofgem’s Integrated Transmission and Planning Regulation (ITPR). Whilst the ITPR has been evolving, the relevant regulation at the time of Norfolk Vanguard & Boreas’s (then known as East Anglian North) initial grid connection planning was as per the document at Reference B. Of note, Ofgem identified that (Page 7 – Para. 1.10):

“1.10 These changes to the SO’s role could give rise to conflicts of interest for National Grid, for example by creating opportunities for the SO to share information with its associated delivery interests to confer an advantage, or give biased advice to favour its own commercial interests. We will implement a package of measures (transparency, scrutiny, conduct obligations, information ring-fencing and business separation) to mitigate these conflicts.”

National Grid’s (NG’s) ‘conflict of interest’ is demonstrated in the IOTP(E) 2015 Report (supplied previously) whereby NG decided that there would be a less than 10GW supply from offshore windfarms, thus ensuring that they could grant radial connections using the IOTP (E) Report’s Cost Benefits Analysis (CBA) regardless of Ofgem’s intent. The Round 3 Auction in 2009 announced the successful bidders, relevant to the East Coast were as follows: Dogger Bank Zone **9GW**, Hornsea Zone **4GW**, East Anglian Zone **7.2GW** (See attachment) **total 20.2GW**. Therefore, NG’s argument of 10GW or less from the East Coast windfarms, in their IOTP (E) 2015 Report is fundamentally flawed. Also, it could be argued, that NG have acted in their own best interests by ensuring that they could grant radial connections by hedging Ofgem’s regulation in the IOTP(E) 2015 Report.

A campaign colleague has waded through the Norfolk Vanguard & Boreas pre-examination connection point document (Reference C) and Norfolk Boreas examination document (Reference D). Although the text for both documents is the same, it is not clear why the documents provided to the ExAs for both projects are inconsistent being: the Norfolk Vanguard submission is for both projects and in the pre-examination documents but only for Norfolk Boreas within the Environmental Statement submission? However, could this indicate that the connection point was not given sufficient importance in the Norfolk Vanguard examination?

A precise of what we now know with regards to the development of the connection point offer for Vanguard is as follows:

- The southern zone was originally shared by Vattenfall and SPR (Scottish Power Renewables) as per the Round 3 auction in 2009.
- The East Anglian Zone was split into 6 areas with “grid agreements” as early as June 2013 (Reference C, Page 5, Para 20).
- The grid connection offers were already in place and planned by NG with 3.6GW (SPR) to Bramford, 1.8GW to Bacton, 1.0GW (Vattenfall) to Lowestoft
- In July 2015 Vattenfall and SPR decided to split the zone into separate projects with each company committed to 3.6GW of supply:
 - SPR got the southern portion with 3.6GW connection offer at Bramford.
 - Vattenfall got the northern portion with 3.6GW to Bacton and Lowestoft.
- National Grid then reneged on the Bacton and Lowestoft connections claiming they would take ten years to provide (note it was still only 2015).
- Vattenfall therefore looked for another grid connection, and ended up at Necton.

Of utmost importance, the set of grid connection offers in place at July 2015 corresponded to ‘Design 15c’ of the IOTP(East) study, Appendix 3, page 63. (Copy Attached). National Grid was then required to provide new substations (“new S/S”) at Bacton and Lowestoft but claimed it would take “10 years to develop”, this despite Vattenfall being on record as stating that they will have “windmills turning by 2025.” Somewhere there is a disconnect between the NGENSO requirements to manage the Grid and provided cost effective electricity for the consumer. What has transpired, since 2015, is a hash of radial connection agreements with very little investment from NG. We suspect that NG have failed in their clear legal requirements as the ESO whilst profiteering from the developers to improve the existing substations at Necton and Norwich Main.

The diagram at the attachments includes the 2GW connection from Hornsea (discussed previously) and the 3.6GW from both Vattenfall’s and SPR’s areas in an integrated design or ‘ORM’ as the campaign has named it. However, NG claimed it could not be done and have prevaricated every issue. There is no doubt that the onshore environment will be damaged by the use of radial connections which we maintain, were not, and still are not, necessary.

Compiled by Ray Pearce NSAG

Jenny Smedley
NSAG

-