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Our ref: PM11/CW18/56335.1/MUNRO

Your ref: EN010103

23 June 2022

When telephoning please ask for: Patrick Munro

Dear The Planning Inspectorate

Application by Net Zero Teesside Power Limited and Net Zero North Sea Storage Limited for an Order Granting Development Consent for the Net Zero Teesside Project
Planning Inspectorate Ref: EN010103
CATS North Sea Limited (Registration Identification Ref: 20029916)
Deadline 3 Response

This response is submitted on behalf of CATS North Sea Limited (“**CNSL**”) to the Examining Authority for Deadline 3 of the above examination.

Comments on Applicants’ responses to ExA’s ExQ1

CNSL has reviewed the Applicants’ responses to ExA’s ExQ1 and has the following further comments.

GEN.1.10

The Applicants’ response states, amongst other things, that whilst not planned at this stage, some key pre-work has been completed to ensure there remains the potential for future expansion up to three trains. It is further noted that there is plentiful gas supply with the CATS pipeline (1,700MMcf/d).

CNSL note that the Applicants would require the consent of CNSL to connect to CATS infrastructure directly. As detailed in section 4 of CNSL’s written representation, at this stage no agreement has been reached to do so.

MA.1.11

CNSL consider that the change requested submitted by the Applicants and accepted by the ExA has reduced, but not removed, the impact of the proposed development on the CATS pipeline and other operational land of CNSL.

CNSL’s concerns in this respect are outlined in its written representation submitted for Deadline 2.

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Classification: Confidential

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Comments on the Applicants' dDCO

As detailed in section 7 of CNSL's written representation, it is considered that the protective provisions contained in Part 5 of Schedule 12 of the draft DCO for protection of the CATS pipeline are inadequate. CNSL are continuing to engage with the Applicants with a view to agreeing suitable wording.

Statement of Common Ground

CNSL are discussing a Statement of Common Ground with the Applicants and expect to be able to be able to submit an agreed form SoCG on or before Deadline 4.

Yours faithfully

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BURGES SALMON LLP