

## **WRITTEN REPRESENTATION**

### **ALTERNATIVE GRID CONNECTION POINT**

**Deadline 8: 17th JULY 2023**

### **Norfolk Parishes Movement for an OTN**

Madam Chair, on behalf of the Norfolk Parishes Movement for an Offshore Transmission Network ("The Norfolk Parishes Movement") we now provide further information relevant to the current examination of the SEP and DEP proposals.

We refer to Principal Issues raised at the Preliminary Meeting held on 17<sup>th</sup> January 2023 (EN010109-000712, paragraph 6). It was accepted by the parties that an alternative grid connection point was an agreed Principal Issue. The submissions made by The Norfolk Parishes Movement to the ExA at Deadline 1 (REP1-145), Deadline 2 (REP2-066), Deadline 3 (REP3-151), Deadline 4 (REP4-054) and Deadline 7 (EN010109-001911) set out our concerns at the approach taken by the Applicant, in conjunction with National Grid ESO and National Grid ET, in failing to properly disclose the alternative grid connection points considered for SEP and DEP and the adequacy of the evaluations carried out to determine Norwich Main as the chosen Grid Connection Point.

In response to these representations, the Applicant continues to reiterate its view that consideration of grid connection alternatives is outside the scope of this Examination.

We now present to you a letter dated 13 July 2023 signed by Andrew Bowie MP, Parliamentary Under Secretary of State (Minister for Nuclear and Networks) at the Department for Energy Security and Net Zero. We wish to draw the attention of the ExA to the sentence highlighted in paragraph 5 of the letter.

We consider this letter is relevant to the current examination in respect of SEP and DEP for the following reasons:

- The letter reinforces our view that there is a clear responsibility on developers to properly and fairly consider alternatives
- The ExA will shortly be making a recommendation to the Secretary of State in the government who has overall responsibility for the Department for Energy Security and Net Zero.

In making the recommendation to the Secretary of State on the suitability of the SEP and DEP projects, we respectfully suggest that the ExA will wish to ensure that the DCO application is in fact compliant with the legal requirements and also the expectations of the Department for Energy Security and Net Zero.

**Please see below letter from Andrew Bowie, MP.**



## Department for Energy Security & Net Zero

Andrew Bowie MP  
Minister for Nuclear and Networks

Department for Energy Security  
& Net Zero

[www.gov.uk](http://www.gov.uk)

Our ref: MCB2023/16192

Ms Rosie Pearson  
Founder  
Essex Suffolk Norfolk Pylons

Email: [pylons@mail.com](mailto:pylons@mail.com)

13 July 2023

Dear Ms Pearson,

Thank you for your letter dated 16 June addressed to the Prime Minister, the Rt Hon Rishi Sunak MP, regarding energy infrastructure in East Anglia. As your letter concerns networks, it has been transferred to the Department for Energy Security and Net Zero and I am responding as this matter falls within my Ministerial portfolio.

My priority for the region is to ensure that all options are considered, by the correct and responsible organisations, and that the eventual outcome is consistent with and undertaken through the impartial planning process, which is in place to consider community concerns. Among many factors, I put great importance on continued dialogue with communities hosting this infrastructure in achieving this.

The Government remains committed to coordination and is working closely with a number of late-stage projects to achieve this. Some of these coordinated options will be offshore, but only in circumstances where there is an appropriate balance between costs to consumers, deliverability and the minimisation of community and environmental impacts. Even with offshore solutions, onshore infrastructure will still be needed, such as cabling and substations, to connect to the national grid at landing locations and take energy from where it is generated to where it is needed.

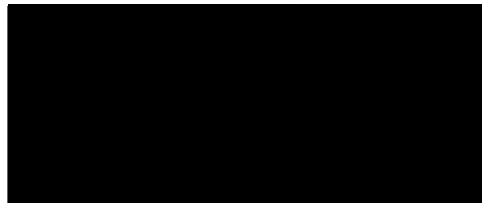
Regarding adherence to the Treasury Green Book, you note in your letter, the Green Book provides standard guidance for evaluating the benefits and outcomes of projects. The Electricity System Operator's (ESO) cost benefit analysis used for Large Onshore Transmission Investment submissions is built on the Green book principles and spackman methodology. Ultimately, Transmission Operators (TOs) proposals are subject to independent appraisal by the ESO in line with the Green book guidance. Ofgem expect TOs to reference the Green Book in their submissions, particularly when providing evidence on the forecast benefit of their projects. However Ofgem do not expect or look for an exhaustive implementation of it. Our processes are both broader in terms of focussing on the needs of consumers and more industry-specific than the scope of the Green Book which is necessarily generic.

The Government does not make planning applications or choose precise routes for energy transmission infrastructure but does set the rules for a robust and independent planning process. As such, it is not the role of government to undertake any assessment of alternatives to the locations chosen by the National Grid Electricity System Operator (ESO) or transmission operators and developers. Individual developers must demonstrate how their proposal meets nationally set criteria and has fairly considered alternatives. Each project holds statutory consultations to ensure community views are considered.

You may wish to write to NGET as the responsible party for the transmission and ESO as system designer to highlight the points you raise in relation to specific locations with the potential to host connections to the grid. As the responsible organisation, independent of Government, they are best placed to respond in full on these matters.

I hope you will find this reply helpful.

Yours aye,



**Andrew Bowie MP**  
**Minister for Nuclear and Networks**