

Awel Y Mor DCO (the Project)

Written Statement on behalf of National Grid Electricity Transmission Plc (NGET)

1 Introduction

- 1.1 As set out in NGET's previous representations, NGET has a number of assets that form an essential part of the electricity transmission network in England and Wales either within, or in close proximity to, the Project (including Bodelwyddan substation, various overhead lines and underground apparatus). Bodelwyddan substation is essential to serve a number of existing and future power generation projects, including the Project. For this reason the NGET project team has been negotiating with the Promoter to agree suitable protective provisions.
- 1.2 The purpose of this written statement is to update the Examination on the progress of these negotiations, and specifically the outstanding issue referred to in NGET's response to the Examining Authority's Second Written Questions, namely the safeguarding of the future extension of the Bodelwyddan substation.

2 NGET's Existing Apparatus

- 2.1 As part of the Project RWE proposes to undertake works (being Work Nos. 36, 39, 39A and 40) to enable the connection of the Awel Y Mor Project into the existing Bodelwyddan substation (the **Connection Works**). In this regard, the Order Limits of the Project include part of the existing Bodelwyddan substation as well as land immediately to the west of the substation.
- 2.2 NGET and the Promoter have therefore been negotiating protective provisions to be included in the DCO which are now largely agreed insofar as they relate to NGET's existing apparatus.

3 Future Extension of the Bodelwyddan substation

- 3.1 The key outstanding issue in the negotiations between NGET and the Promoter is the safeguarding of the future extension of the Bodelwyddan substation.
- 3.2 As indicated in NGET's previous representations, NGET is bringing forward a project to upgrade the existing Bodelwyddan substation in the near future (the **Bodelwyddan Upgrade**). These upgrade works comprise the physical extension of the Bodelwyddan substation and associated works and infrastructure (including new overhead line gantries and the related diversion of an existing gas pipeline to facilitate the substation extension). The area required for the Bodelwyddan Upgrade is an area of land within the Order Limits for the Project situated immediately west of the current substation. (In broad terms, the required area for the permanent infrastructure associated with the substation extension will indicatively comprise the area running 108m westwards from the existing substation and 80m north to south. In addition to the permanent works a temporary construction/laydown area is anticipated to extend a further 50m to the west with the same width in north-south direction as the permanent works i.e. 80m).
- 3.3 The Bodelwyddan Upgrade is critical infrastructure to enable the connection of multiple projects at this location, with the Project being only one of a number of projects requiring a future connection to the Bodelwyddan substation. NGET has entered into connection agreements with each of the relevant customers obligating NGET to provide a connection for each of their individual projects. A similar connection agreement is in place with the Promoter.
- 3.4 At the present time NGET anticipates that it should be possible to provide the Promoter's connection via the existing substation but this is dependent upon the relative timings of the different projects and which project comes first. However, without the Bodelwyddan Upgrade,

the existing substation simply does not have the capacity to connect all of the aforementioned projects.

- 3.5 The Bodelwyddan Upgrade is therefore essential infrastructure that is required for multiple projects. As such it cannot be prejudiced by any of the projects that need to connect at this location and it certainly should not be treated as a 'rival' to the Project. Critically, there is also a technical solution available to ensure the extension and the Project can both come forward effectively.
- 3.6 For this reason, NGET has been seeking to agree protective provisions with the Promoter to safeguard the Bodelwyddan Upgrade. These provisions are based on the safeguarding provisions included in the recent DCO for Keadby 3 where a similar scenario arose. Whilst they do give NGET an approval right over the Connection Works in line with the Keadby 3 provisions, the wording proposes a collaborative approach by both parties to deliver both schemes in an appropriate manner and in the exceptionally unlikely event that relevant matters cannot be agreed then there are the Arbitration provisions within the Protective Provisions to resolve any disagreement. As such, the provisions do not prohibit the Promoter's connection to either the existing or extended substation at Bodelwyddan and the ultimate comfort for the Promoter is the fact that NGET is obliged to provide the requisite connection as per the connection agreement.
- 3.7 In order to give the Promoter further comfort regarding the Connection Works, NGET has been exploring the possibility of geographically limiting the safeguarding protective provisions that explicitly prohibit works from being carried out without NGET's prior approval to a defined "Exclusion Zone" area within the Order Limits, rather than such restriction applying to the whole of the Order Limits within the relevant Works Drawings. Ultimately NGET's aim is to ensure that both projects can come forward appropriately; plainly it is in neither NGET nor the Promoter's interests for the Project's connection to be installed in an inappropriate position within the Order Limits where it would then need to be moved because of the Bodelwyddan Upgrade.
- 3.8 Notwithstanding all of this, at the present time the Promoter has provided no indication that it agrees the principle of such safeguarding provisions.

4 Conclusion

- 4.1 As per NGET's last update to the Examination, the key outstanding issue in the negotiations between NGET and the Promoter is the safeguarding of the future extension of the Bodelwyddan substation.
- 4.2 NGET will continue to work with the Promoter on the form of protective provisions to be included in the DCO and will provide a further update to the Examination at Deadline 8. In the event that an agreed position has not been reached by that stage, NGET will provide the Examination with the form of protective provisions that it requires be included in the DCO for the Project in order to safeguard both existing apparatus and the Bodelwyddan Upgrade, along with the precedent for such wording.

Addleshaw Goddard on behalf of NGET

27 February 2023