



# **STATEMENT OF COMMON GROUND BETWEEN NATIONAL GRID ESO AND DRAX POWER LIMITED**

## **Drax Bioenergy with Carbon Capture and Storage**

The Planning Act 2008 (as amended)

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## **EXECUTIVE SUMMARY**

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A Statement of Common Ground (SoCG) is a written statement produced during the application process for a Development Consent Order (DCO). It is prepared jointly by the applicant and another party, to assist the Examining Authority in examining the DCO application by providing an understanding of the status of discussions or negotiations between the applicant and the other party.

This SoCG has been prepared between National Grid ESO (NGESO) and Drax Power Limited (the 'Applicant') (jointly referred to as the Parties) to show where agreement has been reached to date in relation to the Applicant's application (the Application) for a DCO for their Bioenergy with Carbon Capture and Storage (BECCS) project (referred to as the 'Proposed Scheme'). The SoCG represents an accurate and up to date reflection of matters discussed between the Parties. It is a document which has evolved during the examination, and concludes with this version which confirms the Parties' agreement on all relevant matters.

NGESO is interested in the Proposed Scheme as the organisation responsible for network system control to the Drax Power Station through the existing 132 kV air insulated switchgear and 400 kV substation at the Drax Power Station.

# **1. INTRODUCTION AND PURPOSE**

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## **1.1. PURPOSE OF THE STATEMENT OF COMMON GROUND**

1.1.1. A Statement of Common Ground (SoCG) is a written statement produced during the application process for a Development Consent Order (DCO) and is prepared jointly by the applicant and another party or parties.

1.1.2. Paragraph 58 of the Department for Communities and Local Government's (DCLG, now Department for Levelling Up, Housing and Communities) guidance entitled 'Planning Act 2008: examination of applications for development consent' (26 March 2015) (DCLG, 2015) hereafter referred to as DCLG Guidance) describes a SoCG as follows:

*"A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence."*

1.1.3. The aim of a SoCG is to assist the Examining Authority in examining the DCO by providing an understanding of the status of discussions or negotiations between the applicant and the other party. The effective use of SoCGs aids an efficient examination process.

1.1.4. A SoCG is updated as necessary or as requested during the examination.

## **1.2. DESCRIPTION OF PROPOSED SCHEME**

1.2.1. A full description of the Proposed Scheme description is included in Chapter 2 (Site and Project Description) of the ES submitted with the DCO Application (APP-038) as amended by the Change Request - 8.5.1 Proposed Changes Application Report (AS-045) and Change Request - 8.15 Second Change Application Report - Rev 1 (AS-126).

1.2.2. Of particular relevance to NGENSO and this SoCG are the required upgrade works to the existing 132 kV air insulated switchgear and possible required upgrade works to the 400 kV substation, both located at the Drax Power Station Site. Further details of the relevant works are provided in section 1.4 below.

## **1.3. THIS STATEMENT OF COMMON GROUND WITH NGENSO**

1.3.1. This SoCG has been prepared between NGENSO and the Applicant (jointly referred to as the Parties) in relation to the Application.

1.3.2. NGENSO manage the electricity transmission network to ensure the system is balanced and ensure that as the energy mix (types of generation) changes and more

flexibility is required on the network, electricity can still be distributed to homes / business at all times.

- 1.3.3. As part of this SoCG, reference has also been made to the National Grid Electricity Transmission (NGET), who own the electricity transmission network and are responsible for undertaking any modification works to their electricity transmission network assets. However, as NGENSO manage the electricity transmission network and as any new Modification Application (Mod App) is required to be made to NGENSO, they will represent the main party for this SoCG. A separate SoCG has been prepared between NGET and the Applicant (document reference 8.1.10).
- 1.3.4. This SoCG addresses topics of interest to NGENSO. NGENSO is interested in the Proposed Scheme as the organisation responsible for network system control to the Drax Power Station through the existing 132 kV air insulated switchgear and 400 kV substation at the Drax Power Station.
- 1.3.5. NGENSO would be responsible for processing the Mod App and requesting NGET undertake the required system studies to define the required modification works that would be needed to facilitate the increase in import capacity. It is noted that NGENSO will provide input from a system assurance perspective only and shall not provide a view on the build of physical assets required for the upgrade works.
- 1.3.6. It is noted for reference that NGET will also be undertaking new installation and upgrade works for a separate project at and around the Drax Power Station Site, the Scotland to England Green Link (SEGL2) project. The project comprises a 2 GW electricity transmission network connection which proposes to increase the capability of our network between Scotland and the rest of the UK with a link between Peterhead and Drax and involves installation of a converter station to the east of Drax Power Station, across New Road and approximately 500m of underground cabling between the converter station and the 400 kV substation at Drax Power Station. There will be also works to be undertaken at the 400 kV substation. Ofgem has approved the initial needs case and the final needs case for the SEGL2 Project, with the final needs case approved in the Eastern HVDC – Conditional Decision: Final Needs Case dated 8 July 2022 (the Ofgem FNC Decision). In the Ofgem FNC Decision, Ofgem confirmed that the SEGL2 Project is necessary and will deliver significant benefits for consumers by allowing additional renewable generation to connect to the network and reduce constraint costs. There is a national need for the SEGL2 project.
- 1.3.7. National Grid has submitted a planning application (ref: 2022/0711/EIA) to Selby District Council and a planning application (ref: 22/01990/STPLFE) to East Riding of Yorkshire Council for the delivery of the SEGL2 project.
- 1.3.8. Any discussions had with NGENSO, which are relevant to the modification works for the Proposed Scheme, have been included in Table 2.1.
- 1.3.9. Section 3 summarises the topics of relevance to this SoCG and Section 4 then details whether matters are agreed, not agreed or under discussion between the

Parties. All matters are currently under discussion until NGENSO's position is set out, so it is envisaged this document will be updated as the Examination progresses.

- 1.3.10. In respect of environmental topics covered in the Environmental Statement submitted with the Application but not referred to in this SoCG, NGENSO has no comments to make at present.
- 1.3.11. Following the Applicant's consultation on the Proposed Changes to the Application, and the acceptance of them into the Examination by the Examining Authority, NGENSO agrees that the statements in this SoCG apply to the application inclusive of those Proposed Changes. If NGENSO have any concerns in respect of the Proposed Changes, these will be expressed through the Relevant Representation process currently being undertaken.
- 1.3.12. This SoCG has been prepared in accordance with the DCLG Guidance.

## **1.4. DESCRIPTION OF THE ELECTRICAL WORKS REQUIRED FOR THE DRAX BECCS PROJECT**

- 1.4.1. This section provides an overview of the electrical works to be implemented under this DCO application, indicating responsibility and providing reference to the required NGENSO procedures to be followed.
- 1.4.2. Steam, which is required for several processes within the Proposed Scheme, will be extracted from the existing biomass units. To maximise efficiency, the steam will be passed through two new Combined Power Turbines, which will supply steam at the required process conditions.
- 1.4.3. The Combined Power Turbines will also generate electricity to be used by the Proposed Scheme. The Combined Power Turbines will be connected through new distribution voltage infrastructure to be constructed near to the BECCS plant equipment. The new distribution voltage infrastructure will be installed by the applicant as part of this DCO application.
- 1.4.4. To ensure uninterrupted operation of the Proposed Scheme during start-up/shutdown, transient and fault conditions (when power from the Combined Power Turbines is not available), an alternate secondary electrical supply is required.
- 1.4.5. Reusing the existing Flue Gas Desulphurisation (FGD) 5 and 6 connections, the secondary electricity supply will be provided from the 132 kV air insulated switchgear on the Drax Power Station Site. With respect to ownership of the 132 kV switchgear, the Applicant owns and manages the circuit breakers, bus bar disconnectors and earth switches prior to the bus bar connection and NGET owns and manages the bus bars, the 400/132 kV supergrid transformers, associated cabling and telemetry.

- 1.4.6. To enable the required secondary electricity supply, upgrade works will be required to the 132 kV air insulated switchgear and possibly to the adjacent 400 kV substation if NGESO determines this is necessary.
- 1.4.7. To understand the extent of the upgrade works, a Mod App will be submitted to NGESO, which will enable NGESO to request that NGET conduct system studies to determine the exact upgrades required on both the 132 kV air insulated switchgear and 400 kV substation. This process will generally take three months to complete. Notwithstanding the pending conclusions from the Mod App, an outline description of the upgrade works has been included in Schedule 1 of the draft DCO, specifically Work No. 1F (i), which covers the potential upgrade to the existing 400 kV National Grid substation, and Work No. 1F (ii) which covers the modifications and upgrade to the 132 kV air insulated switchgear including but not limited to circuit breakers, busbar disconnectors, and earth switches. The areas in which these works can be undertaken have been indicated on the Works Plans (document reference AS-073) under the wider Work No. 1F.
- 1.4.8. Preliminary work undertaken by the Applicant indicates upgrades will be required on the Applicant owned circuit breaker, bus bar disconnectors and earth switches within the 132 kV air insulated switchgear however this will be confirmed following submission of the Mod App. It is acknowledged that any work undertaken within the 132 kV air insulated switchgear will need to be carried out under NGET safety rules by NGET approved contractors and in accordance with protective provisions in the form required by NGET.

## 2. RECORD OF ENGAGEMENT UNDERTAKEN TO DATE

### 2.1. RECORD OF ENGAGEMENT

2.1.1. The tables below set out a summary of the key meetings and correspondence between the Parties in relation to the Proposed Scheme.

**Table 2.1 – Schedule of Meetings and Correspondence during the Pre-application Stage**

Date	Form of Contact and Attendees	Summary
<b>5 October 2021</b>	<u>Teams Meeting</u> (BECCS Project)  Drax;  NGET; and  NGESO.	Discussion points included: <ul style="list-style-type: none"> <li>• Overview of BECCS supply</li> <li>• If Carbon Capture plant trips, could we transfer the CHP power onto the 132 kV air insulated switchgear? Implications commercial/technical</li> <li>• Metering requirements</li> <li>• Boundary of ownership in 132 kV air insulated switchgear for asset condition. (tying in outages for breaker replacement/cable replacements)</li> <li>• Consequence of 2 x 100MVA supplies on wider network and timings of new solar/battery projects into Drax.</li> </ul>
<b>9 December 2021</b>	<u>Email</u>  From NG to Drax.	National Grid response to the Section 42 Planning Act 2008: Statutory Consultation.

**Table 2.2 – Schedule of Meetings and Correspondence during the Pre-Examination and Examination Stages**

Date	Form of Contact	Summary
<b>October – November 2022</b>	<u>Emails</u>  From WSP to NGESO.	WSP have sought to reach agreement on relevant matters and shared a draft SoCG to NGESO for review.



<b>22 November 2022</b>	<u>Email</u> From WSP to NGESO.	WSP provided an updated version of a draft SoCG, for NGESO to review and comment, which included updates arising from the drafting of a separate SoCG with NGET.
<b>26 January 2023</b>	<u>Online Meeting</u> NGESO; and <u>WSP.</u>	Following their review of the draft SoCG, NGESO provided an update on position and agreed actions to undertake to ensure draft SoCG was in a position to submit to the ExA at Deadline 1 (02 February 2023).
<b>26 January 2023</b>	<u>Email</u> From NGESO to Drax and WSP.	Following the above online meeting, NGESO provided written clarification of the key point of discussion undertaken meeting.
<b>26 January – 02 February 2023</b>	<u>Emails</u> Between WSP and NGESO.	Agreement of Revision 01 of the SoCG.
<b>March – July 2023</b>	<u>Emails</u> Between WSP and NGESO.	Agreement of Revision 02 of the SoCG.

### 3. SUMMARY OF TOPICS COVERED BY THIS STATEMENT OF COMMON GROUND AND RELEVANT DOCUMENTS

#### 3.1. TOPICS COVERED IN THIS STATEMENT OF COMMON GROUND

3.1.1. The following topics discussed between the Parties are covered by this SoCG, noting this list may change as discussions continue:

- Upgrade works to the 132 kV air insulated switchgear and possibly to the adjacent 400 kV substation to enable an increase in import capacity to Drax Power Station.

#### 3.2. RELEVANT DOCUMENTS FOR THIS STATEMENT OF COMMON GROUND

3.2.1. Table 3.1 provides a list of documents of particular relevance to this SoCG. This list will be updated to keep a record of the most recent version of the relevant document.

**Table 3.1 – List of Relevant Application Documents for this SOCG**

<b>Document Reference</b>	<b>Document Name</b>
<b>REP8-005</b>	3.1 Draft Development Consent Order (dDCO) (Clean) - Rev: 8
<b>AS-105</b>	2.2 Land Plans - Rev: 03
<b>AS-106</b>	2.3 Works Plans - Rev: 04
<b>APP-038</b>	6.1.2 Environmental Statement - Volume 1 - Chapter 2: Site and Project Description
<b>REP6-017</b>	6.6.1 Outline Landscape and Biodiversity Strategy - (Clean) – Rev: 05
<b>APP-181</b>	6.6.2.1 Outline Landscape and Biodiversity Strategy - Volume 2 - Figure 1: Landscape and Biodiversity Mitigation Plan
<b>APP-182</b>	6.6.2.2 Outline Landscape and Biodiversity Strategy - Volume 2 - Figure 2: Off-site Habitats Provision Area
<b>APP-183</b>	6.6.2.3 Outline Landscape and Biodiversity Strategy - Volume 2 - Figure 3: Existing Retained Vegetation

<b>Document Reference</b>	<b>Document Name</b>
<b>REP2-018</b>	6.3.5.1 Environmental Statement - Volume 3 - Appendix 5.1: Outline Construction Traffic Management Plan (Clean) - Rev: 05
<b>APP-036</b>	5.6 Grid Connection Statement
<b>AS-045</b>	Change Request - 8.5.1 Proposed Changes Application Report - Accepted at the discretion of the Examining Authority

## 4. CURRENT POSITION

### 4.1. KEY MATTERS

Table 4.1 – Key Matters

Ref.	Description of Matter	Applicant – Current Position	NGESO – Current Position	Position
4.1	Submission of Modification Application (Mod App) to NGENSO – To inform upgrade requirements to enable an increase in import capacity to Drax Power Station.	<p>The Proposed Scheme proposes a connection to Drax Substation. A Mod App is required to the current agreement to enable an increase in import capacity to Drax Power Station.</p> <p>The Applicant is working with National Grid to enter into connection agreements and other commercial arrangements via the Mod App to amend the existing Bilateral Connection Agreement (BCA) between the Applicant and NGENSO.</p> <p>It is agreed that the Mod App will enable NGENSO to request that NGET undertake the required system studies to define the works required to be undertaken at the 132 kV air insulated switchgear and possible works required to be undertaken at the 400 kV</p>	<p>NGESO are considering the Mod App and consider this can be determined in its usual fashion. It is agreed that the Mod App does not need to be determined before the DCO Application and therefore all matters are agreed.</p>	Agreed

Ref.	Description of Matter	Applicant – Current Position	NGESO – Current Position	Position
		<p>substation, both located at the Drax Power Station.</p> <p>An outline description of the upgrade works has been included in Schedule 1 of the draft DCO. Work No. 1F (i) covers the potential upgrade to the existing 400 kV National Grid substation and Work No. 1F (ii) covers the modifications and upgrade to the 132 kV air insulated switchgear including but not limited to circuit breakers, busbar disconnectors, and earth switches.</p> <p>The areas in which these works can be undertaken have been indicated on the Works Plans (document reference AS-073) under the wider Work No. 1F.</p> <p>The Mod App does not need to be determined prior to the determination of the DCO Application. Therefore, these discussions do not need to delay the consideration and determination of the DCO Application.</p>		

## 4.2. OTHER CONSENTS AND LICENCES

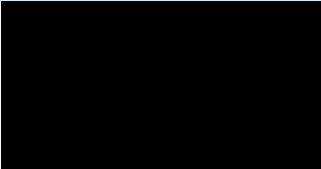
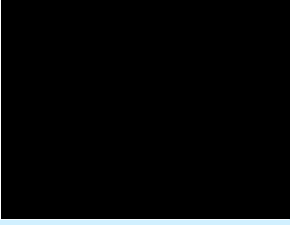
Table 4.2 - Other Consents and Licences

Ref	Consent / Licence	Applicant – Current Position	Anticipated Submission Date / Timescales	NGESO – Current Position	Position
4.2	Energy Licence Modification Application (Electricity Act (1989))	Submission of a Modification Application to increase import capability to support the BECCS start up and transient events.	Application submitted September 2022.	NGESO considers that there is no impediment to it being able to consider and determine this consent in its usual fashion.	Agreed

## 5. SIGNATURES

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**Table 5.1 – Signatures**

<b>Ref.</b>	<b>National Grid Electricity System Operator (NGESO)</b>	<b>Drax Power Ltd (the Applicant)</b>
<b>Signature</b>		
<b>Printed Name</b>	Joseph Martin	Dr James Doyle
<b>Title</b>	England & Wales Onshore Generation Connections Manager	Planning and Consents Manager
<b>On behalf of</b>	National Grid ESO	Drax Power Ltd
<b>Date</b>	12 July 2023	10/07/2023