


From: [Dempsey, Michael](#)
To: [Mona Offshore Wind Project](#); [Jones, Charlotte](#)
Subject: RE: Enquiry in relation to Examination Timetable [ADDGDD-LIVE.FID4589617]
Date: 17 December 2024 18:04:43
Attachments: 

Importance: High

Dear Jake

Thank you for your e-mail.

It is certainly NGET's intention to make a further written submission prior to Deadline 6 in order to respond to the Promoter's Response to the Examining Authority's Written Question 2.6.9 regarding Statutory Undertakers (ExQ2) (the Promoter's Response) and the accompanying set of protective provisions for the benefit of NGET submitted at Deadline 5. This submission also goes to issue 28 in the action points from ISH6.

The reason for such submission and for enquiring about a possible appearance/hearing date is because NGET has a number of concerns about the Promoter's account of the position with NGET set out in section 1.5 of the Promoter's Response - in particular, its summary of NGET's position, negotiations to date, the outstanding issues and the adequacy of the Promoter's suggested protective provisions. NGET's written submission will address these matters in detail. However, in summary, NGET does not accept the Promoter's assertion that the Promoter's suggested protective provisions would avoid serious detriment to NGET's undertaking. A fundamental concern for NGET is the omission of safeguarding provisions in respect of NGET's future projects to extend and upgrade Bodelwyddan substation and the associated overhead lines to enable the connection of multiple projects at this location (including, indeed, the Promoter's own project). The omission of such safeguarding provisions will be to the serious detriment of not just NGET but multiple connectee projects reliant on those future upgrades.

The first time that NGET had sight of the Promoter's Response and suggested protective provisions was after the same had been uploaded to the PINS website after Deadline 5. Up until that point, NGET had understood the Promoter's position to be as set out in NGET's written representation of 7 August 2024, i.e. that the Promoter was essentially reserving its position on the draft protective provisions that NGET first provided to the Promoter in June, pending ongoing discussions between the parties. Given those ongoing discussions and the fact that the protective provisions that NGET was seeking had recent precedent in the Awel Y Mor DCO (another connectee project at this same location), NGET had no reason to believe that these protective provisions would become contentious.

NGET was therefore caught by surprise by the Promoter's Response and the accompanying set of protective provisions, whereby the Promoter is clearly no longer reserving its position on the protective provisions for the benefit of NGET. It is this late change of position by the Promoter

to NGET's detriment that has prompted NGET to approach the Examination about possible further hearing dates.

Whilst we take on board your comments below about timings and reasonable notice of further hearings, this request is the result of the Promoter's actions and, whilst the protective provisions are likely to be of little interest to third parties/the public, there is a fairness point that arises here in respect to NGET as a statutory undertaker who will be directly affected by the DCO project. There is also a month until the Examination closes. Notwithstanding the Christmas break, it surely would be possible to provisionally accommodate a hearing during either of the weeks commencing 6 or 13 January 2025 before the Examination closes?

We would be grateful if you could liaise with the ExA accordingly and, if it would assist, we can provide some suggested dates during this period when the NGET team would be available to appear at the Examination.

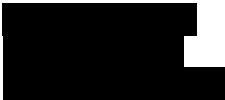
We look forward to hearing from you.

kind regards

Michael Dempsey
Legal Director

Addleshaw Goddard LLP

Tel
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From: Mona Offshore Wind Project <MonaOffshoreWindProject@planninginspectorate.gov.uk>
Sent: Tuesday, December 17, 2024 11:35 AM
To: Jones, Charlotte [REDACTED]@addleshawgoddard.com>
Cc: Dempsey, Michael [REDACTED]@addleshawgoddard.com>; Mona Offshore Wind Project <MonaOffshoreWindProject@planninginspectorate.gov.uk>
Subject: RE: Enquiry in relation to Examination Timetable [ADDGDD-LIVE.FID4589617]

Dear Charlotte,

Thank you for your email.

Given the time remaining within the Examination, the Examining Authority (ExA) are of the

opinion that reasonable notice cannot be given to ensure that all parties would have a fair chance of being able to attend/ participate in any other hearings. Please note that National Grid Electricity Transmission PLC (NGET) were invited to hearings held throughout the Examination.

The ExA also issued [ExQ2](#) on 19 November 2024, which contained written questions aimed at Statutory Undertakers (including NGET) at [Q2.6.5](#) and [Q2.6.10](#).

Finally, it may be worth looking at Action 28 from the [ISH6 Action Points](#). This was placed on the Applicant, but NGET are also welcomed to respond.

Please note Deadline 6 closes 23:59 on Friday 20 December 2024.

Kind regards,
Jake



Jake Stephens | Rheolwr Achos / Case Manager
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From: Jones, Charlotte [REDACTED] [\[REDACTED\]@addleshawgoddard.com](mailto:[REDACTED]@addleshawgoddard.com)>

Sent: Friday, December 13, 2024 3:41 PM

To: Mona Offshore Wind Project <MonaOffshoreWindProject@planninginspectorate.gov.uk>

Cc: Dempsey, Michael [REDACTED] [\[REDACTED\]@addleshawgoddard.com](mailto:[REDACTED]@addleshawgoddard.com)>

Subject: Enquiry in relation to Examination Timetable [ADDGDD-LIVE.FID4589617]

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Good afternoon

We act for National Grid Electricity Transmission PLC in relation to the Mona Offshore Wind Farm DCO.

We note that the Examination timetable does not make provision for any further hearings prior to the close of Examination on 16 January. However, we would like to enquire whether further hearings can be called and on what basis? If further hearings can be called, when could the timetable accommodate it?

Kind regards

Charlotte

Charlotte Jones

Associate

Addleshaw Goddard LLP

Tel [REDACTED]

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