



MAINSTREAM
RENEWABLE
POWER



Transmission Access
Future Electricity Networks Team
Department of Energy & Climate Change
3 Whitehall Place
London
SW1A 2HD

Dear Sir,

RE: Improving Grid Access – Technical Consultation

Mainstream Renewable Power is a leading global renewable energy company. We are developing onshore wind projects in North America, South America and South Africa. In the German North Sea, we are developing the 1000 MW Horizont offshore project.

In the UK, we are developing two large offshore wind projects. In Scottish territorial waters we are developing the 450 MW Neart Na Gaoithe project. Additionally, through the SMart Wind consortium, we are taking forward the 4000MW Hornsea Round 3 zone with our partners Siemens Project Ventures.

Mainstream welcomes this consultation as we believe that accessing the grid is one of the most significant challenges in developing offshore wind farms.

Mainstream supports the implementation of Connect and Management on an enduring basis. Our comments on some of the specific points raised in the consultation are addressed below.

Market Power Licence Condition

Mainstream supports the concept of a new Market Power Licence Condition to protect consumers from exploitation of market power.

Enabling Works

Mainstream is satisfied with the current definition of enabling works. In implementing Connect & Manage, it will be important to ensure National Grid properly distinguishes between enabling and wider works in order to provide an appropriate grid connection date.

Derogation

Mainstream supports the concept of self-derogation managed by Transmission Operators (TO's). This would enable TO's to look at their assets and quickly assess whether connecting additional generation is feasible or not. However, there is currently a lack of clarity as to the process by which self-derogation would operate and we look forward to clarification here.

User Commitment

DECC's proposal to extend the notice given by generators from 5 days to 1 year and 5 days is welcomed by Mainstream. However, we think this could be further extended in order to assist with future grid planning.

Transition Arrangements

Mainstream see little difference between Interim Connect & Manage and the enduring Connect & Manage regime. However, we urge DECC to clarify the application of transition arrangements in terms of current and future offshore connections as at this moment it is unclear.

Transmission Charging

Although DECC indicated that changes to the transmission charging arrangements are outside the scope of this consultation, Mainstream believe that for an efficient and expansive system and mix of renewables, the charging methodology needs to be reconsidered.

Summary

Mainstream supports the viewpoint taken by DECC in this consultation. However, we stress that even with Connect and Manage, some generators will still likely be offered with unacceptable grid connection offer dates and this will need to be addressed. Furthermore, the current grid charging methodology could limit offshore wind development and should be revisited.

If you have any queries regarding the response please do not hesitate to contact me.

Nick Fedorkiw

Mainstream Renewable Power