

EnBW and bp joint response to Ofgem “Revised Minded-to Decision and further consultation on delivery models in Pathway to 2030”

Executive summary

- We welcome interventions to speed up grid delivery and connection dates for offshore wind (OFW) projects.
- We believe that commercial arrangements resulting from the required grid works need to be suitably socialised so that OFW developers are not burdened with excessive costs.
- We support the introduction of a late competition OFTO build model for non-radial offshore transmission assets but have concerns on cost allocation and recovery and the ability of generators to finance both the generation asset and the shared transmission assets.
- We seek further detail on the late competition OFTO build model and how responsibilities and legal obligations are allocated between developers and OFTOs.
- We support the extension of AI policy to the projects within the scope of the PT2030 workstream.
- We recommend early and regular application of AI principles to protect developers from disallowed cost post construction.
- ESO and Ofgem should be part of the early-stage assessment / gateway assessment to endorse both AI and the project design when any part of the AI is attributable to bypassing onshore network constraints.
- More work is required on the proposed mechanics of charging to take account of coordinated infrastructure.
- We would encourage a more fundamental review of whether TNUoS remains fit-for-purpose.