T3 Load Reopener: [redacted]

Eligibility Letter

Document Classification | **Highly Confidential**

Scottish & Southern Electricity Networks

TRANSMISSION

Contents

Executive Summary

Following approval of the Need in Ofgem's Final Determination, this Eligibility Letter under Special Licence Condition (SpC) 3.18 within our Transmission Licence, sets out our request for Ofgem approval for the preferred option for the [redacted] request for Track 2 pathway and to set a PCD covering Pre-Construction Funding. In support of the project, SSEN Transmission (SSENT) is requesting an additional PCF allowance of [redacted] under SpC 3.15. The estimated project cost is [redacted]

The [redacted] is the second of three stages, to expand [redacted]

To maintain programme, the project has been progressing with development of a [redacted] solution, with preferred sites and routes identified and Pre-Construction Funding required to support further investigations (including Ground Investigations, Marine Surveys and Environmental Impact Assessments) to confirm these sites/routes and mitigate key risks in further work to refine designs for consent submissions.

Without approval of the preferred option, and the subsequent release of Pre-Construction Funding, we are unable to progress this project, potentially delaying a number of contracted generation and demand Customers who have offers pending in the Connections Reform Gate 2 to whole queue (G2tWQ) process and have been assessed as needed for the achievement of Clean Power Plan 2030. [redacted]

The project was captured in RIIO - T3 Business Plan and supporting documentation submissions to Ofgem and in the Final Determination Ofgem assessed the need was 'justified', however, the optioneering view was 'partially justified,' due to concerns regarding our voltage selection of [redacted]. We have continued to engage on this point ahead of this eligibility letter submission and our position remains that a [redacted] is required and is the value for money option because:

- **Future proofed** to future generation and demand requirements, with no evidence of need for a higher voltage. [redacted] that is beyond the known project pipeline (i.e. not currently part of G2TWQ process), in line with the [redacted] developed by [redacted] as well as significant [redacted] All of which would be developed to the [redacted]
- **Reduced consenting risk –** [redacted] is unique from both an environmental and landscape perspective, with no existing [redacted]. The reduced footprint and land take of the [redacted] manages the challenging environmental constraints on [redacted], particularly

[1] [redacted]

minimising the disturbance of Class 1 peatland and international environmental designations which are extensive across the [redacted]. The reduced [redacted] also mitigates potential visual impact, a key sensitivity in feedback to date with stakeholders, with [redacted]. Managing both environmental and stakeholders' concerns as far as reasonably practicable, is critical to successful consent submissions and minimises the risk of lengthy consenting challenges which would delay Customer Connection dates.

- **Reduced Delivery and safety challenges –** The increased footprint and size of [redacted] is challenging to deliver on [redacted] due to the unique topography, geographic and environmental constraints, particularly the extensive coverage of Class 1 Peatland on an undulating landscape, creating significant slope stability and associated safety challenges.
- **Cost effective, value for consumer –** a higher voltage solution (such as [redacted]) would cost the consumer more. Our [redacted] shows that there is no additional operational or economic benefit to either a higher voltage solution or additional circuits down the [redacted]

Our preferred project pathway is Track 2. Following completion of the Eligibility Letter Assessment, the project should progress directly to Project Assessment, without the need for further need and option assessment. While the project has costs [redacted], detailed justification and optioneering has previously been provided via the submission of a full Engineering Justification Paper as part of our RIIO-T3 Business Plan submission. The need is clear and we have addressed Ofgem concerns about our optioneering therefore there is no need for additional assessment through a Needs Case submission. Track 2 is also required to maintain programme, with the additional Track 3 requirement for a Needs Case submission delaying statutory Public Consultations, which would impact consent submission dates and ultimately project completion. As a result of this, an Independent Technical Assessor (ITA) is not required given the significant amount of Ofgem review on this project and introducing one now would delay the project and associated Customer Connection dates.

[redacted]

We ask that Ofgem:

- Confirm eligibility for the LR
- Confirm Track 2 pathway for regulatory funding, with progression straight to Project Assessment
- Amend SpC 3.15 Pre-Construction Funding in line with the Final Determination decision of [redacted]
- Confirm that an ITA [redacted] will not apply

This submission is made in accordance with SpC 3.15 ("Pre-Construction Funding Re-opener and Price Control Deliverable") and SpC 3.18 ("Load Reopener and Price Control Deliverable") of SSENT's Licence. The content within this submission is aligned to the requirements in Ofgem's "Re-opener Guidance and Application Requirements Document Version 4" (dated 28th October 2025).

We are applying to Ofgem for a direction to amend the outputs and associated allowances in Appendix 2 of SpC 3.15 of our Licence. This is permissible in respect of new Load Re-opener Outputs. SSEN-T may apply to the Authority for a direction amending the outputs, delivery dates, or associated allowances by submitting an Eligibility Letter for the relevant Load Re-opener as set out in Part D of Special Condition 3.18 Load Re-opener and Price Control Deliverable (LRt).

Reference Table

Project Title:	[redacted]	**Delivery Year**	[redacted]
BPDT/Scheme Reference Number	[redacted]	**Applicable Reporting Tables**	[redacted]
RRP References	[redacted]	**Connections**	[redacted]
Cost (23/24):	[redacted]	**Total MW of Clean Power Generation**	[redacted]
Load Board Reference	[redacted]		
Investment Driver	*CP2030 - Load Reinforcement*		
PASE alignment	[redacted]		

	[redacted]
Outputs	[redacted]
Extension Cost *(applicable only to substations)*	[redacted]
Historic Funding Interactions	Not Applicable
Interactive Projects	[redacted]

Table 1: Reference Table

Project Summary Table

Name of Scheme	[redacted]
Investment Driver	[redacted]
Solution(s)	[redacted]

[2]To support the development of a strategic network plan for [redacted], we used developer and stakeholder feedback to create strategic future energy pathways for [redacted] modelled after the NESO's Future Energy Scenarios (FES) for 2024. The Clear View pathway represents the contracted and offered project pipeline across [redacted] for the next decade. More information on our future energy pathways for [redacted] is provided in Justification of Need.

	[redacted]
PASE Compliance	Yes, with PASE variant options.
PASE Evidence Variant Option	[redacted]
Spend Apportionment	[redacted]

Table 2: Project Summary Table

1. Introduction

This eligibility letter sets out our plans to expand the existing [redacted]

[redacted] SSEN Transmission has developed a [redacted] investment strategy for [redacted] that balances the risks of investment with the need to deliver a coordinated, future-proof and economically viable network for net zero. An overview of the [redacted] strategy for [redacted] is provided in Figure 1 below.

[redacted]

Figure 1: [redacted] *Transmission Strategy (Overview)*

To strengthen regulatory confidence in SSEN Transmission proposed solution, this paper aims to address Ofgem's outstanding concerns related to optioneering and scope. It complements our previous EJP submission ([redacted]) and Draft Determinations response addendum ([redacted] and provides the updated position with regards to the ongoing Connections Reform process and Gate 2 to whole queue (G2TWQ) exercise.

2. Regulatory Treatment

This submission is made in accordance with Special Licence Condition (SpC) 3.15 ("Pre-Construction Funding Re-opener and Price Control Deliverable") of SSENT's Licence. The content within this submission is aligned to the requirements in Ofgem's "Re-opener Guidance and Application Requirements Document Version 4" (dated 28th October 2025).

We are applying to Ofgem for a direction to amend the outputs and associated allowances in Appendix 2 of SpC 3.15 of our Licence. [redacted]

2.1. Pre-Construction Funding

To support the [redacted] Project, SSEN Transmission is requesting [redacted] of pre-construction allowances in order to fully fund the development of activities necessary to reach a constructable solution, secure all material planning consents and ensure connection delivery dates.

[redacted]

Based on the conclusion of the [redacted] Strategy assessment, further pre-construction activities have been completed to [redacted]

Expected Pre-Construction Activities include [redacted]

In line with SpC 3.15.24 e), the activities are required to develop the project up to the point of construction, including delivering critical path items related to ground investigations, preparation of

consenting application and submission, and discharge of consenting. [redacted]

In line with SpC 3.15.24 c), A full breakdown of our PCF is included within the cost estimate provided in Appendix F and provides a detailed summary of the PCF spend to date and forecast broken down into Pre-Construction Works Categories. Table 3 proposes the amendments to be made to Appendix 2 of SpC 3.15 Pre-Construction Funding Price Control Deliverable Allowance. [redacted]

In line with SpC 3.15.24 d), A PCD covering pre-construction activities should be set following approval of this Eligibility Letter. This should be done through modification to SpC 3.15 Pre-Construction Funding, our proposed amendments are listed in the table below.

[redacted]

Table 3: Summary of PCF PCD

We expect a PCD covering the shared use infrastructure works to be added to SpC 3.18 Load Reopener as part of the Project Assessment. The current delivery year is [redacted] to align with the Governments Clean Power Action Plan for 2030.

Our preconstruction activities will develop these projects to the point which they can be consented and derisk the design and construction programme such that delivery timelines can be met. We will use preconstruction funding to mitigate the following risks:

[redacted]

[redacted]

2.2. Eligibility

The projects meet the criteria[3] for the load reopener:

- Capital expenditure exceeds [redacted]
- The project is load-related and excluded from the Volume Driver given the costs [redacted]
- The project will begin construction within the RIIO-ET3 price control period; and is expected to complete in [redacted]

The project was previously assessed within the RIIO-3 business plan and Ofgem has requested an eligibility letter be submitted to place it within the Load Reopener.

[redacted]

2.3. Preferred Assessment Track and Rationale

The projects should be confirmed as Track 2. Following Eligibility Letter Assessment and the unlocking of Pre-Construction Funding this project should progress to Project Assessment, without further requirement for Needs Case Approval.

[redacted] we have provided detailed optioneering via an Engineering Justification Paper submitted as part of our RIIO-T3 business plan and submitted further information as part of our response to Draft Determinations. The evidence submitted previously, and as part of the eligibility letter would constitute a Needs Case submission and therefore, we do not see the need, or benefit, for further Ofgem assessment as part of a Track 3 needs case. We have engaged extensively with Ofgem on our rationale for a [redacted] solution and have provided evidence that it is the most value for money solution:

- **Future proofed** to future generation and demand requirements, with no evidence of need for a higher voltage. Our [redacted] preferred strategy can efficiently accommodate significant additional prospective onshore wind generation on [redacted] (an [redacted] has been assessed) [redacted] All of which would be developed to the [redacted] where we will deliver [redacted]
- **Reduced consenting risk –** [redacted] is unique from both an environmental and landscape perspective, with [redacted] The reduced footprint and land take of the [redacted] manages the challenging environmental constraints [redacted], particularly minimising the disturbance of Class 1 peatland and international environmental designations which

[3] The criteria is the project must have capex >£40m, be load related and excluded from the volume driver and begin construction within the T3 period.

are extensive across the island. The [redacted] also mitigates potential visual impact, a key sensitivity in feedback to date with stakeholders, with no existing steel lattice towers on the [redacted] currently. Managing both environmental and stakeholders' concerns as far as reasonably practicable, is critical to successful consent submissions and minimises the risk of lengthy consenting challenges which would delay Customer Connection dates.

- **Reduced Delivery and safety challenges** – The increased footprint and size of [redacted] towers is challenging to deliver on [redacted] due to the unique topography, geographic and environmental constraints, particularly the extensive coverage of Class 1 Peatland on an undulating landscape, creating significant slope stability and associated safety challenges.
- **Cost effective, value for consumer** – a higher voltage solution (such as [redacted]) would cost the consumer more. [redacted]. This is because, [redacted]

[redacted]

[redacted]

[redacted]

2.5. Qualitive Justification: Maturity, Optioneering and PASE

The project has already progressed through the submission of a full EJP ([redacted]) and an optioneering EJP Addendum ([redacted]), both focused on strengthening the

Needs Case. While Ofgem raised some concerns regarding optioneering depth and voltage selection, the core need has been approved, demonstrating that the foundation of the project is sound and well-developed. The remaining points of clarification relate to optioneering refinement rather than the fundamental justification for the reinforcement.

The [redacted] is broadly PASE compliant, although several elements fall under PASE variant options due to local environmental and system-driven considerations. [redacted]

[redacted]

The need and preferred option is clear and there are risks to delivery if Ofgem decide to place the project in Track 3. We have provided justification on the need and option and therefore there is no need for additional Ofgem assessment of Need and Option.

2.6. Major Project ODI Eligibility

The project does not currently meet the criteria for the setting of a Major Projects ODI.

[redacted] To finalise sites selected and refinement of routes to a final alignment, further studies and more detailed investigations are required to inform further refinement of design, the associated programme and risk register maturity. [redacted] are being accelerated in our programme to further inform mitigation.

These investigations are scheduled to commence [redacted] to provide earlier insight and opportunity to mitigate potential impacts. Upon completion of these works, we will kick off [redacted]

[redacted]

Alongside this, connections reform is ongoing, with offers being sent to customers who require the shared use infrastructure to connect. [redacted]

As this project is not part of the CSNP (Centralised Strategic Network Plan) the NESO will not be developing an Optimal Delivery Date (ODD) for [redacted] as there are [redacted]

Furthermore, we will be incentivised to deliver the connection in line with Ofgem policy associated with the Connections ODI. Although the [redacted], we expect Ofgem policy to remain unchanged and that [redacted]

Therefore, as [redacted] We are supportive of reconsidering this at the point of Project Assessment.

2.7. Independent Technical Advisor (ITA)

It is our view that appointment of an Independent Technical Advisor (ITA) following the eligibility letter would not provide any benefit to the consumer at this stage.

- Ofgem has undertaken significant assessment and analysis of the proposed projects, including assessing an EJP and associated addendums. Introducing an ITA now to assess the optioneering would delay the project as we would not be able to progress detailed design and development works for the [redacted] solution.
- The project is complex and material, with novel use of [redacted] infrastructure, however we see no benefit of involving an ITA in later stages of development after detailed optioneering has taken place.
- The project is strategically important in achieving CP2030 and government offshore wind targets, however significant engagement has occurred with Ofgem on our strategy for some time.

We recognise that Ofgem may want to apply an ITA at a later state, if for example, it has concerns about deliverability. We are happy to discuss this further at the Project Assessment phase.

3. Needs Case

3.1 Justification of Need

As covered in both our previous EJP submissions to Ofgem ([redacted]), the [redacted] we have received [redacted]

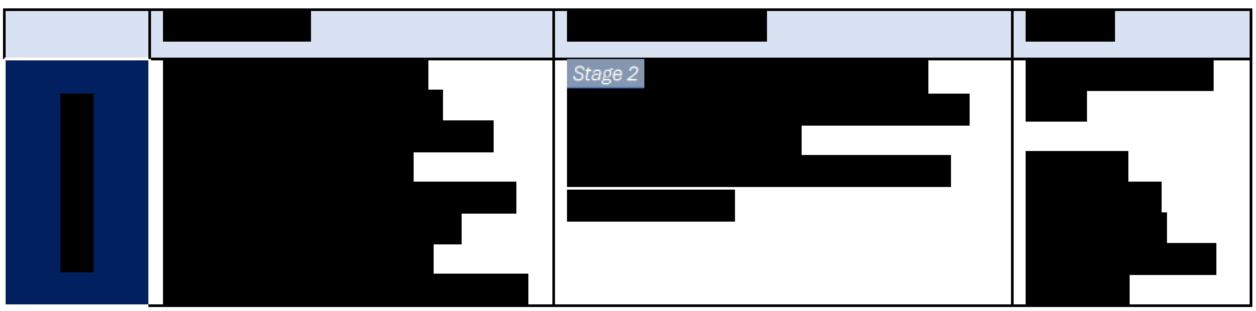
[redacted]

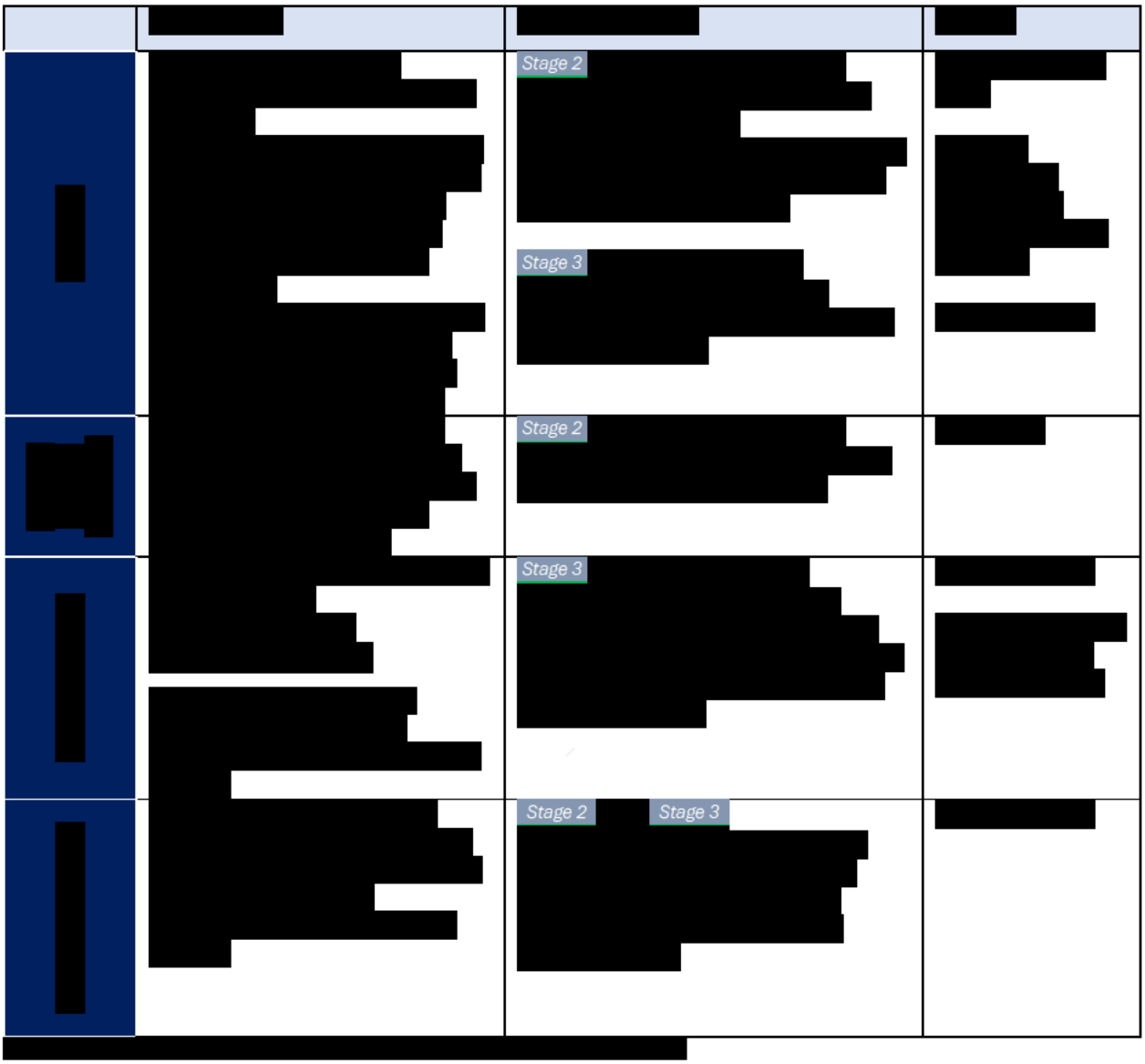
The NESO identified [redacted] as one of the areas where large-scale strategic demand could be located as an alternative to asset build [redacted] transmission infrastructure is therefore of strategic importance to realise the 'Beyond 2030' recommendations of the NESO. [redacted]

[redacted]

Prior to the [redacted], there was [redacted]

[redacted]





A 'do nothing' option is not credible as we will not be able to provide a connection [redacted] nor meet the NESO's strategic recommendation from the 'Beyond 2030' report without new on-island infrastructure.

As described in our previous full EJP submission to Ofgem [redacted] to determine the right network in the right place at the right time, we sought stakeholder feedback to understand the potential of clean energy projects as well as the development plans and ambitions of key stakeholders, including the [redacted] we held a webinar with

developers and issued a detailed questionnaire to existing and prospective energy developers on and around the [redacted]

To support the development of a strategic network plan for [redacted], we used this developer and stakeholder feedback to create strategic future energy pathways for [redacted]

[redacted]

Figure 2[redacted] Strategic Energy Pathways Installed Generation and Demand Capacity by technology (out to [redacted])

The Clear View pathway represents the contracted and offered project pipeline across [redacted] for the next decade. To determine the Clear View Pathway, a likelihood of connection assessment was [redacted]

1. Progressing through the application process on [redacted]
2. Part of the project pipeline of future generation and demand projects in [redacted] (supported by extensive stakeholder engagement with developers and other interested parties); or

3. Includes additional [redacted]

[redacted]

As covered in both our previous submissions to Ofgem ([redacted]), we have undertaken [redacted] We have summarised the optioneering and outcome from this assessment in the 'Optioneering' section below.

3.2 Project Benefits

The [redacted] transmission strategy delivers a significant uplift in [redacted] network capacity and enables significant benefits to system resilience and [redacted] decarbonisation by [redacted] Our preferred [redacted] strategy [redacted]

The [redacted] strategy, [redacted]

The [redacted] is broadly PASE compliant, although several elements fall under PASE variant options due to local environmental and system-driven considerations. [redacted]

[5] The [redacted] designates spatial zones that are potentially suitable for onshore wind farm development. We used [redacted] to quantify the area of land on [redacted] suitable for development and adjust the area to account for additional factors that impact development suitability.

[redacted]

[redacted]

Overall, the [redacted] strategy proposed provides a future-proof, resilient and decarbonisation-aligned transmission solution that enables current and future connections, supports integration of the [redacted] reduces long-term consumer costs, and delivers the right infrastructure in the right place at the right time to meet GB-wide Net Zero objectives.

3.3 Economic Benefits

The [redacted] economy has historically benefited from the [redacted] This has resulted in excellent infrastructure, particularly [redacted] and an experienced supply chain in the delivery of large projects, [redacted] It has a [redacted] with [redacted] playing a large role in the economy, [redacted]

As with other parts of the [redacted]

[redacted] has outstanding natural resources and as such has a huge opportunity to benefit from [redacted]

Brief description of the approach

This analysis uses [redacted]

GVA by project and combined

[redacted]

[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

[redacted]

Jobs Supported

[redacted]

[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

[redacted]

4. Optioneering

4.1 Environmental Considerations

All proposed [redacted]

The need to transition to [redacted]

The [redacted] is divided into [redacted] Across [redacted], extensive areas of Class 1 peatland – designated as nationally important carbon-rich soils – require careful consideration (see Figure 3). In line with the Scottish Governments National Planning Framework 4, all design proposals must include appropriate mitigation for peatland impacts.

Figure 3: Environmental Constraints (left) and Class 1 peatland map (right) for [redacted]

Aligning network design with the wider GB transmission system remains a key priority for SSEN Transmission. However, the unique environmental conditions in [redacted] make the development of [redacted] infrastructure particularly challenging – especially where [redacted] The [redacted] with only one road corridor which runs from [redacted] As stated in our previous EJP submissions [redacted] It is therefore critical that the [redacted] transmission strategy minimises the visual impact of this line route from the [redacted]

[redacted]

The hilly, peat-rich landscape of the [redacted] presents [redacted] As a result, we are [redacted] where possible, [redacted]

Offshore, the [redacted] which are more compatible with spatial and environmental constraints. Further, as noted in our previous EJP submissions [redacted] working on an island presents [redacted] This is expected to be particularly challenging on [redacted] We are currently developing a plan, with [redacted]

4.2 Stakeholder Engagement

SSEN Transmission is a stakeholder-led business, and we engage with stakeholders, operate and advocate on their behalf to deliver a network for net zero. We understand the critical role that our business plays in addressing customer, societal, environmental, and economic issues in Scotland and the UK. In parallel with the NESO's Holistic Network Design (HND) process and ahead of the 'Beyond 2030' publication, we launched a questionnaire in July 2023 (provided as an additional supporting document), and carried out an online seminar, to gather [redacted] The feedback was positive, and we obtained a high response rate on the questionnaire issued. This information, along with our generation and demand connections pipeline and [redacted] based on which we developed our transmission [redacted] network strategy.

We have also collaborated with [redacted]

Regular meetings have also been held with [redacted] to discuss the [redacted] Strategy. [redacted] have confirmed that they see net zero as an opportunity for the [redacted]

The [redacted] are keen to balance the opportunities of the energy transition with the need for greater support for [redacted] and are keen to coordinate energy developments on and around [redacted] to minimise community and environmental impact. They highlighted [redacted] The [redacted] aims to encourage collaboration and ensure continued focus on local benefits for [redacted] In addition, a [redacted] report has been published by the [redacted] which outlines guiding principles for achieving the best possible outcomes for [redacted] from the energy transition.

Further, due to the extent of energy development proposed on [redacted] has developed and shared their Energy Development Principles which are focused on Environmental Protection, Sectoral Co-existence, Local Supply Chain Integration and achieving Benefits to the [redacted] These principles reflect common themes from our public and stakeholder engagement to date, particularly relating to the need to minimise adverse impacts from developments on the [redacted] natural environment, recognising potential impacts on [redacted] from developments, and managing and containing detrimental effects by taking a cumulative view.

Reflecting the extent of development required to deliver our strategy and scale of existing infrastructure (currently [redacted]), we have taken a proactive approach to community engagement on [redacted] we hosted a series of early engagement events, with around [redacted] across all events. These events introduced the [redacted] Strategy and initial route and site considerations to the public, welcoming feedback, and further discussion (prior to events to meet statutory planning requirements). The first was a collaborative event, bringing together many of the [redacted] and members of the public, providing opportunity to share SSEN Transmission's [redacted] strategy in a clear and coordinated manner alongside [redacted], allowing stakeholders to see the full picture of how the different projects and infrastructure fit together.

Following this event, we proceeded with a round of localised events, [redacted] to the local communities and Statutory Stakeholders. Aligned with [redacted] key themes from these engagements were the importance of mitigating visual impact, highlighting the environmental sensitivities on [redacted], economic importance of the marine environment and the need for tangible benefits to the community. There was [redacted] This reflects the challenge we anticipate in consenting and the importance of a solution which minimises visual impact, as far as

reasonably practicable, considering future capacity requirements, supporting the case for a [redacted] Following these engagements, we are reviewing feedback and identifying and assessing suitable alignments and site arrangements to mitigate impacts.

4.3 List of Considered Options

As explained under the Justification of Need section, the existing [redacted] This requires a strategic [redacted] transmission solution that enables connection of contracted projects, supports CP2030 delivery, and integrates efficiently with the [redacted]. The optioneering process summarised below sets out how the preferred technical solution was identified.

We have had extensive stakeholder engagement through questionnaires, site consultations, developer workshops, and engagement with [redacted] which led to the creation of four strategic energy pathways out to [redacted]

1. Clear View
2. Holistic Development
3. High Electrification
4. High Hydrogen.

These pathways informed the capacity requirements, environmental constraints and system integration needs for the future [redacted] network.

Using our [redacted] approach, SSEN Transmission developed a [redacted], covering [redacted] These were assessed through an initial multicriteria assessment considering [redacted] We then undertook further detailed optioneering [redacted] to arrive at a [redacted] as detailed in Table 7.

[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]

6 [redacted]

[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]

Table 7: Considered Options [redacted]

To address Ofgem concerns in the draft determinations on the consideration of a high voltage solution, we included additional evidence on [redacted] strategy (as detailed in Section [redacted] and brought this forward into the option shortlist for direct comparison. The [redacted] strategies had a total [redacted] respectively, which is approximately [redacted] Our multi-criteria assessment for the [redacted] strategies (as detailed in section [redacted]) evidences the significant consentability and deliverability challenges associated with these strategies.

4.4. Optioneering Justification

A comprehensive [redacted] was undertaken and is fully detailed within the previously submitted Engineering Justification Papers [redacted] The qualitative and quantitative results, presented in Tables 10 to 14 of [redacted] show that Option 2a is justified as the preferred [redacted] transmission solution because it offers the best balance of cost, capacity, deliverability and environmental suitability when compared against

all alternative options assessed. [redacted] reinforces this conclusion, with Option 2a achieving the [redacted] The combined qualitative and quantitative evaluation presented in Table 14 of [redacted] identifies Option 2a as the leading solution across all assessment categories.

The [redacted] within the submitted EJP demonstrates that although the [redacted], they result in significantly higher levels of unserved energy under [redacted] for the [redacted] would [redacted] creating [redacted] (these are detailed in [redacted]). As a result, the apparent [redacted]

Our EJP addendum [redacted] includes an updated option shortlist table and updated qualitative and quantitative assessment which compares the [redacted] against the [redacted] alternatives. See Table 3 of [redacted] for the updated overall qualitative and quantitative assessment outcome. As can be seen, [redacted] than Option 2a, and Option 2a also scores the best for 'acceptability' and 'deliverability'. Our proposed [redacted] (as covered in more detail below) is significantly shorter and less visually intrusive than [redacted] has a reduced footprint and achieves longer spans [redacted] reducing tower numbers and construction impact. This is particularly important given [redacted], extensive Class 1 peatlands, and steep slopes which create [redacted]

In addition, our original [redacted] already concluded that there is no additional operational or economic benefit (for either [redacted]) to either a [redacted] as the [redacted] of [redacted] (which has [redacted]) was identical to Option 2a. This is because, at the level of capacity provided by Option 2a, [redacted]

In summary, our comprehensive multi-criteria assessment (MCA) and [redacted] undertaken in both EJP submissions ([redacted]) show that:

- [redacted]
- [redacted]
- [redacted]

Ofgem request further justification, on specific aspects of the submitted EJP [redacted] and Addendum [redacted] and these are further discussed below.

4.5. Voltage Selection [redacted]

The [redacted] was selected because [redacted] system needs are fundamentally shaped by the export limits of the [redacted] (please note that our energy pathways include significant capacity of 'prospective' onshore wind on the island, as covered in 'Justification of Need', which is why we are confident on future [redacted] requirements).

We have evidence which shows that we need the future capacity for a [redacted], but we do not have evidence which shows the need for a higher voltage [redacted] higher capacity solution, which is why we consider these solutions to have a red RAG for 'Acceptability' and 'Deliverability' and ultimately consider them to not be consentable on [redacted]. As part of our stakeholder engagement, [redacted], reflecting strength of feeling from the community that visual impact should be mitigated as far as reasonably practicable.

[redacted]

4.6. Tower Design and Span Length

As [redacted] for SSEN Transmission for OHL (or switchgear, as detailed in both previous EJP submissions) an assessment was completed considering a range of bespoke tower structures to identify the most suitable solution to support the delivery of the [redacted] transmission network. The assessment considered each option's technical performance, environmental impact, constructability, operational and maintenance requirements, programme risk, and cost-effectiveness, concluding that the [redacted] offer a reliable, proven solution with existing designs, operational familiarity, and acceptable adaptability for [redacted] environmental and topographical conditions.

In comparison to an equivalent [redacted] design provides a longer span and as all circuits can be carried on a single structure (rather than multiple structures in parallel) requires significantly fewer towers, reducing visual and environmental impact. As shown in Figure 4 [redacted] substantially increasing visual impact and ground disturbance, with a wider footprint and more substantial foundation requirements. [redacted]

[redacted]

5. Solution

Our previous EJP submissions to Ofgem ([redacted]) concluded that [redacted] is the best option for the [redacted] project because it is the only solution that is credible, deliverable, future-proof, community-aligned and economically optimal, providing sufficient capacity to support [redacted] near-term and long-term role in the UK's net zero transition while mitigating cost and planning risks.

In Ofgem's Draft Determination response, the need was 'justified' however, the optioneering view was 'partially justified, due to concerns regarding our voltage selection of [redacted] Following this, as part of our Draft Determinations response we submitted further information titled [redacted]. Following further engagement and a site visit to [redacted], this helped to reduce some uncertainty on our whole system optioneering, however Ofgem still remain concerned that the current bespoke solution may not sufficiently meet future system requirements so the optioneering remains 'partially justified'.

This Eligibility letter re-emphasises the previously concluded solution ([redacted]) and our explanation of why [redacted] is the best solution for [redacted].

6. Early Cost Views and Estimates

An estimate of the project cost for the preferred option is progressing towards Gate 1 in our LCP process. The costs have been prepared on the criteria and accuracy correlated to the stage of the project in our delivery process.

[redacted]

[redacted]

This Eligibility Letter is seeking approval for need and preferred solution only, costs provided are for illustrative purposes only. Once [redacted]

The current estimate is [redacted] Final costs will be submitted at Project Assessment. [redacted] We have provided a breakdown of early cost estimate for the project in Appendix F and a high level summary below.

[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

	[redacted]			
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

Table 8: Summary of Costs

7. Delivery Timescales and Risks

To progress the development of the on-island infrastructure project, multiple project teams will collaborate - including Project Management, Engineering, Environmental, Consenting, Land, Risk, Quality, Operations, and Safety and Health.

[redacted] in parallel to the T3 price control and Load Reopener process. Activities have included constraint analysis, surveys and design development which has informed identification and assessment of suitable substation sites, overhead line, cable, and marine routes. These route and site options have been shared and discussed with stakeholders through various forums and initial public consultation events which were completed in October 2025. Feedback has informed our ongoing development of proposals and areas for further targeted surveys and investigations [redacted]

The landscape, ground conditions and extensive environmental designations on [redacted] have presented significant challenges in identifying suitable sites to accommodate the necessary space and connection requirements. [redacted]

[redacted] creating construction challenges. Geophysical studies and Ground Investigations are being prioritised to further understand [redacted]

[redacted]

Our preferred option ([redacted]) is estimated to be delivered by [redacted] A high-level summary of the delivery programme for [redacted] is provided in Table 9. The full programme is provided in Appendix D.

[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]

Table 9: High-level delivery programme for the preferred [redacted] strategy ([redacted])

Key risks and mitigations associated with our investment proposals are outlined in Table 13. Due to possible supply chain constraints and associated delivery risk of the preferred solution, we require pre-construction funding under the Clean Power 2030 Plan for the [redacted]

Given the extent of peat on [redacted] and challenging terrain, [redacted] Ground investigations are being prioritised to [redacted] mitigate impacts through adjustment to design. The extent of Class 1 peatland also [redacted] (as detailed in the Environmental Considerations section below).

7.1. Planning Requirements

Several formal planning consents are required to enable the project, as summarised in Table 10 below. [redacted]

[redacted]

[redacted]

Table 10: Summary of Planning Requirements

7.2. Interactive Projects

The [redacted] infrastructure forms a key part of [redacted] Strategy and provides the foundational transmission capability required to support current and future developments. It interfaces with

several major projects that are essential to the wider [redacted] transmission solution, each contributing distinct functions to system operability, capacity, and long-term system planning.

[redacted]

The [redacted] infrastructure is [redacted] strategy, [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

8. Conclusion & Next Steps

This eligibility letter sets out the need, optioneering and preferred solution to deliver on [redacted] on [redacted] to fulfil our [redacted] Strategy. The infrastructure will enable the connection of significant amounts of on island generation and demand.

The need is justified by the need to connect generators [redacted] and support the achievement of CP2030. Without the necessary shared use infrastructure on island, we will not be able to fulfil our connections obligations [redacted]

We have undertaken a detailed optioneering assessment and our preferred solution is the most economic and efficient option and presents significant value for money to the end consumer. Our preferred solution satisfies the NETS SQSS and all relevant technical requirements while remaining deliverable by the energisation date. Our optioneering is justified by a robust CBA which clearly supports the proposed [redacted] solution.

The solutions proposed are PASE variant options and we have provided significant justification for these technological solutions within the letter.

Our preconstruction activities will develop these projects to the point which they can be consented and derisk the design and construction programme such that delivery timelines can be met.

The need is clear and the option is justified therefore the project should be placed in Track 2.

We ask that Ofgem:

- Confirm eligibility for the LR
- Confirm Track 2 pathway for regulatory funding, progressing straight to Project Assessment
- Amend SpC 3.15 Pre-Construction Funding in line with the Final Determination decision of [redacted]
- Confirm that an ITA [redacted] will not apply

Appendix A - System Design Table

System Design Table	Circuit/Project	[redacted]
Thermal and Fault Design	Existing Voltage (If Applicable)	[redacted]
Thermal and Fault Design	New Voltage	[redacted]
Thermal and Fault Design	Existing Continuous Rating	[redacted]
Thermal and Fault Design	New Continuous Rating	[redacted]
Thermal and Fault Design	Existing Fault Rating	[redacted]
Thermal and Fault Design	New Fault Rating	[redacted]
NESO Dispatchable Services	Existing MVAR Rating	[redacted]
NESO Dispatchable Services	New MVAR Rating	[redacted]
NESO Dispatchable Services	Existing GVA.s Rating	[redacted]

NESO Dispatchable Services	New GVA.s Rating	[redacted]
System Requirements	Present Demand	[redacted]
System Requirements	2050 Future Demand	[redacted]
System Requirements	Present Generation	[redacted]
System Requirements	Future Generation Capacity	[redacted]
Initial Design Considerations	Limiting Factor	[redacted]
Initial Design Considerations	Strategic Investment	[redacted]

Table 11: System Design Table

Appendix B – Single Line Diagram (SLD)

[redacted]

Appendix C – Risks

There are [redacted] key risks that are outside of our control that may impact our ability to deliver against our programme, these include:

[redacted]

Table 12: [redacted]

In addition, the key project risks are:

[redacted]

[redacted]

[redacted]

Appendix D – Programme

[redacted]

Appendix E – Glossary of Terms

Acronym	Definition	Description
[redacted]	[redacted]	[redacted]
BESS	Battery Energy Storage System	An advanced energy storage solution that utilises batteries to store electricity.
CAI	Closely Associated Indirect	Indirect Costs which are more directly tied to construction and operation of network assets such as project management and network design as defined within the Regulatory Instructions and Guidance (RIGs).
CAPEX	Capital Expenditure	The funds allocated to acquire, upgrade, and maintain the electricity network.
CBA	Cost Benefit Analysis	A systematic approach used to evaluate benefits and costs of a project.
CP2030	Clean Power 2030	The UK Governments Clean Power by 2030 Plan
CSNP	Centralised Strategic Network Plan	A long-term strategic approach to network planning, taking a broad, whole energy system view transforming the pace and scale of planning. Developed by the NESO.
CV	Clear View	Represents the near-term project pipeline with the Holistic Development (HD), High electrification (HE) and High Hydrogen pathways representing different potential future energy landscapes.
ECU	Scottish Government Energy Consents Unit	• Applications for consent for the construction, extension, and operation of electricity generation stations with capacity in excess of 50MW. • Installation of certain OHL and associated infrastructure • Application for necessary wayleaves • Compulsory purchase orders under the Electricity Act 1989

EJP	Engineering Justification Paper	Submission made to Ofgem by ETOs setting out the scope, costs and benefits for projects or aggregated investment programmes.
EUE	Expected Unserved Energy	A key metric used in electricity planning to assess the adequacy of generation resources.
FES	Future Energy Scenarios	Pathways to Net Zero produced by the NESO, providing a view of future pathways for the whole energy system exploring energy demand and supply.
G2TWQ	Gate 2 to Whole Queue	NESO developed process as part of connection reform, ensuring only projects meeting specific readiness and Strategic alignment criteria progress through the reform queue.
GW	Gigawatt	A unit for measuring electrical power
GIS	Gas Insulated Substation	A compact, high voltage substation where key components are enclosed in SF^6 gas for insulation and arc-quenching. Suitable for space constrained areas or harsh environments.
GSP	Grid Supply Point	Interface between the transmission network and the distribution network facilitating the supply of electricity at the distribution level.
GVA	Gross Value Added	A key economic indicator that measures the value of goods and services produced in an area, industry, or sector.
HE	High Electrification	Future energy pathways modelled after the NESOs Future energy scenarios.
HD	Holistic Development	Future energy pathways modelled after the NESOs Future energy scenarios.
HH	High Hydrogen	Future energy pathways modelled after the NESOs Future energy scenarios.
HND	Holistic Network Design	An integrated approach aimed at connecting offshore wind energy to GBs electricity network.
HVDC	High Voltage Direct Current	Technology used for transmitting electricity over long distances using direct current.

ITA	Independent Technical Advisor	Responsible for providing assurance to Ofgem on design decisions, procurement processes, cost, and overall project delivery of selected load projects across Transmission Owners.
kV	Kilovolt	Unit of electric potential or voltage.
LOLE	Loss of Load Expectation	A metric that estimates the expected number of hours per year when electricity supply is insufficient to meet demand.
LR	The RIIO-T3 Load Re-opener Framework	The Load Re-opener provides Electricity Transmission Owners (ETOs) with a mechanism to request funding for load driven reinforcements.
MCA	Multi-criteria assessment	An assessment methodology to consider trade-offs between a range of objectives.
MW	Megawatt	A unit for measuring electrical power
MVA	Mega Volt-Amperes	A unit of apparent power in electrical systems
NESO	National Energy System Operator	The independent body responsible for the planning and operation of the electricity system in Great Britain
NOA	Network Options Assessment	A methodology used by the Electricity System Operator to evaluate the required levels of network transfer and assess options provided by ETOs to meet this requirement.
NPV	Net Present Value	The difference between the present value of cash inflows and the present value of cash outflows over a period of time.
[redacted]	[redacted]	[redacted]
ODD	Optimal Delivery Date	Reflects an assessment of the date on which delivery of a project would bring the most benefits for the consumers.
ODI	Output Delivery Incentive	ETO's are eligible for financial rewards if projects are delivered on or before the set date. ETO's are liable for penalties if those projects are delivered late.

OEM	Original Equipment Manufacturers	Produces equipment, parts, and components on behalf of another company.
[redacted]	[redacted]	[redacted]
OHL	Overhead Line	Typically, steel lattice towers, steel or wood poles used to carry high voltage conductors over distance.
OPEX	Operational Expenditure	Costs incurred for operational activities.
PASE	Pre-approval of solution by Engineering	A framework set by Ofgem. A set of pre-approved optioneering designs, preferred technology types and configurations that are typically efficient, deliver the lowest whole-life cost to consumers and, where applicable, build capacity for future network expansion.
PCD	Price Control Deliverable	Set by Ofgem, PCDs are used to set expectations for the outcomes of projects and to manage the timing and delivery of these outcomes.
PCF	Pre-Construction Funding	Provides Transmission Owners with funding at early stages of project development to continue to design and seek consent for large ET investments.
ScotWind	Crown Estate Scotland's ScotWind seabed leasing auction	The first round of offshore wind leasing round in Scottish waters. Resulted in 20 projects securing seabed option agreements.
SF^6	Sulphur Hexafluoride	A synthetic gas that insulates and switches electrical current in switchgear.
OSR	Ofgem Scheme Reference Number	The Ofgem provides a unique value for all non load and load related schemes.
[redacted]	[redacted]	[redacted]
SSENT	Scottish and Southern Electricity	Responsible for the electricity transmission network in the north of Scotland.

	Networks Transmission	
[redacted]	[redacted]	[redacted]
TCA	Transmission Connection Assets	Assets used to connect a customer to the grid. These are paid for by the customer.
tCSNP1	transitional Centralised Strategic Network Plan 1	Holistic Network Design for Offshore Wind and Networks Options Assessment 7 Refresh published in July 2022. The NESO's transitional Centralised Strategic Network Plan.
tCSNP2	transitional Centralised Strategic Network Plan 2	Beyond 2030: A national blueprint for a decarbonised electricity system in Great Britain published on 19 March 24. The NESO's second transitional Centralised Strategic Network Plan.
TDD	Target Delivery Date	A determined date utilising the P50 delivery date and Optimal Delivery Date (ODD). Part of the Major Projects ODI-F framework.
TOCA	Transmission Owner Connection Agreement	The formal agreement between Transmission Owners, the NESO, and the Customer. Outlining the terms and conditions for connecting to the electricity transmission network.
UGC	Underground Cable	Insulated conductors used to transfer high voltage electricity below ground. Offers reduced visual impact and utilised when OHL solution is not possible.

Table 14: Glossary of Terms