

SSEN Distribution - Draft Determination EJP Response		
Name of Scheme	Fleet and Bramley 400/132kV substation group	
Primary Investment Driver	The group demand exceeds the highest band in P2/7	
Scheme reference	44/SEPD/LRE/SCO	
Reporting Table	CV1: Primary Reinforcement	
Ofgem EJP Comments	<p>The needs case is based on demand growth causing P2/7 non-compliance. The delivery of the preferred solution is proposed for 2027/28. However, Consumer Transformation Distribution Future Energy Scenarios (DFES) forecast shows peak demand >1500MW by 2024/25. The paper provides no explanation of how the proposed date was reached, or what steps would be taken in the event that the demand group became non-compliant ahead of delivery.</p> <p>The paper also states that investigations into a whole system option with National Grid Electricity Transmission (NGET) will remain ongoing into 2022. It is understood that if this option was to have merit the preferred solution would be superseded. The paper provides no information on how such a potential change would be managed. We consider there is a risk related to the delivery date as the EJP does not present sufficient justification. There is also uncertainty over the preferred solution due to ongoing assessment of the NGET whole system option, which presents a further risk.</p>	
	Final Business Plan Submission	Latest Position (July 2022)
Need Case	The group demand exceeds the highest band in P2/7	The group demand exceeds the highest band in P2/7 and reinforcement works are now customer triggered under EUM545
Demand Forecasts	As per EJP	New customer demand in excess of 100MW including a large customer demand of 70MW since final submission
Connections		<p>Project triggered by customer acceptance for EUM545 offer – 3MW load increase Further customer connection offer acceptances now contracted as second-comers</p> <p>EUM557 – 12MW demand connection</p> <p>EVK735 – 70MW Battery energy storage connection EVF878 – 16MW data centre connection</p> <p>All these schemes require connection as soon as we can make the capacity requirements available</p>

		Various small new connection acceptances (less than 1MW) across group totalling ~40MW since December 2021				
Stakeholder Impact	RenGen load forecasts			Additional new customer connection acceptances as identified		
Preferred Option	Explore the Whole System solution with NGC and keep this under continual review			The recommendation (option 3) aligns with the customer acceptance EUM545 and second-comer acceptances which meets a whole system approach		
Output reference/type	132kV UG Cable (Non Pressurised) 30km 132kV CB (Gas Insulated Busbars)(ID) (GM) 28 Switchroom Build 2 Compulsory Purchase Order (Land purchase) 1 Agricultural compensation 1			132kV UG Cable (Non Pressurised) 30km 132kV CB (Gas Insulated Busbars)(ID) (GM) 28 Switchroom Build 2 Compulsory Purchase Order (Land purchase) 1 Agricultural compensation 1		
Cost	£54,238m			£54,238m		
Delivery year	2027/28			2027/28		
Outputs included in RIIO ED1 Business Plan	No			No		
Spend apportionment £m	ED1	ED2	ED3+	ED1	ED2	ED3+
	0	£54,238m	0	0	£54,238m	0
Deliverability & Risk	Delivery now potentially before 2027/28 due to volume of connections work.					
Summary	<p>This project has now been triggered by a contracted customer connection along with further second-comer contracted large customer connections with a total additional capacity requirement of 101MW since the original EJP. We have completed our opportunity assessment for this project and are now issuing this scheme into development stage of our investment process to facilitate the customer connections.</p> <p>The need is to maintain P2/7 security of supply standards economically across the group, which is best achieved by splitting the Fleet-Bramley group, ultimately into three smaller demand groups within the existing Bramley and Fleet GSP sites instead of establishing a new GSP. This has the added benefit of resolving 132kV distribution network constraints to meet current demand forecasts in addition to known and new large contracted connections across the group in the shorter term. This also provides a phased approach to ultimately split the current Fleet Bramley demand group into three smaller demand groups in conjunction with National Grid as a whole system solution in the medium term.</p> <p>Previous experience indicates establishing a new GSP is likely to result in delay in increasing the network capability to meet forecast demand and new customer connections as consents were not forthcoming (negotiated or compulsory), and would need additional 132kV circuits to those planned to meet customer connections and integrate into the network. Overall splitting the group is the best whole system solution that can be delivered to meet the connection timelines.</p> <p>The cost is unchanged from the original EJP solution, which is the best overall whole system solution to meet the customer connections.</p>					

	We request that Ofgem re-considers its assessment of this scheme with a view to supporting full justification for inclusion in our ED2 Business Plan on the basis of the contracted new connections and phased approach to developing a whole system solution with NG.
Relevant Attachments	PROMIS Job technical reports for connection applications can be provided on request.