Response to consultation on an SF6 Asset Intervention Medium Sized Investment Project from National Grid Electricity Transmission

Dear Mr. Barton,

This is with regard to the consultation on subject matter as outlined in the pdf documentation ref "NGET_SF6_MSIP_Consultation_Aug22_Final.pdf".

We agree with the needs case proposed by NGET and OFGEM's "minded to" view thereof.

As an OEM products and solutions provider in the transmission and distribution market, we would like to express our views on Question 2 which investigates the range of options available to meet the needs case.
More specifically, our response is regarding the discounted options 9 & 10 and OFGEM's response under Clause 4.15.

The "future" portfolios for SF6-free alternatives for all major OEMs are very dynamic with shifts in R&D investments and changes in timeline being driven by market demands. As an example, of the assets that need replacement, 400kV CTs with SF6 free technology is already available in the market.

Furthermore, over the course of the T2 regulatory period, most of the major OEMs will have SF6 free alternatives in the market which may become viable for some of the asset replacement programmes, depending on the actual timeline of these projects.

While we understand OFGEM's expectation of NGET re-assessing these SF6 free options during detailed design, we are unsure if this is feasible given the relatively short duration of the regulatory period and the programme constraints of live projects in the detailed design stage versus the time taken to analyse the available options and assess their technical feasibility. This is made more challenging due to the fact that there are several distinct SF6-free technologies in the market with very different technical characteristics and constraints which increase the complexity of evaluating the various options.

Ultimately, our view is that discounting these options at this stage squeezes the timeframe available to NGET to review the emergent technologies and develop their strategy for evaluating these options with a long-term, sustainable view. This is especially important for High Voltage substation assets due to their long life which necessitates a detailed understanding of their technical performance as well as their impact on the environment over the lifetime of the products.

Best Regards
Abhishek Sarkar