

Comment on the Applicant's Response to RFI paragraph 69

REQUEST FOR INFORMATION

Request for evidence of the viability constraint associated with reduced installed capacity.

APPLICANT'S RESPONSE [[Response to SoS Consultation 1](#), page 143]

The Applicant argues that the OHA recommendation would reduce installed capacity to below the threshold of economic viability. The table [page 144] shows the calculations supporting a minimum viable installed capacity of 935 MWp.

IP COMMENT

Are the calculations demonstrating that

- a) solar farms below 935 MWp are not financially viable, or that
- b) a solar farm connected to a substation at Farmoor is not viable below 935 MWp?

If a), many NSIP solar farms have been consented below 935 MWp. Cleve Hil (373 MWp) is operational today.

If b), then the Applicant is arguing that the environment around Botley West (geography, heritage assets, RVAA issues, etc) makes BWSF unsuitable for a conventionally sized NSIP solar farm. If this is the case, an alternative location should have been selected.

The Applicant also claims that:

3. Independent criterion: contractual connection capacity

... 685 MWp would not enable the Applicant to meet its contractually agreed connection capacity with National Grid of 840 MW.

Incorrect.

BWSF is not required to meet the agreed connection capacity. NGET is required to import up to 840 MW from BWSF; BWSF must not attempt to supply more than 840 MW.

Cleve Hill has a 350 MW connection agreement. It rarely meets 250 MW (see below).

APPENDIX B

The Applicant's Response draws attention, for the first time, to a related design failing.

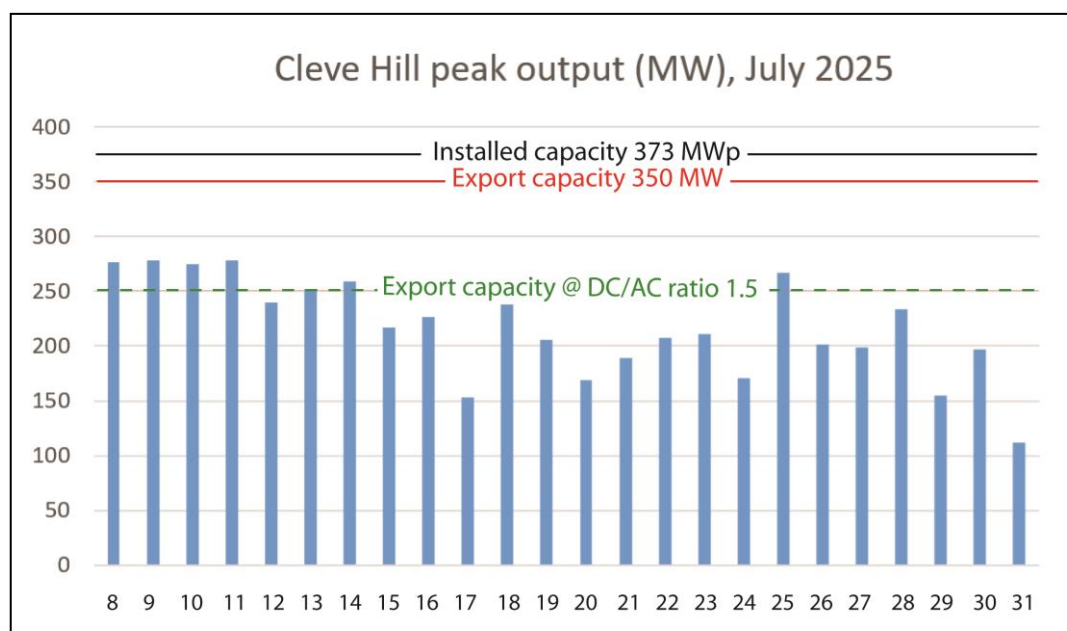
The proposal initially had a DC/AC ratio ("overplanting ratio") of 1.6. Overplanting is encouraged by EN-3 (2025) 2.10.47.

Although the installed capacity had reduced over the course of the examination, the output specification (840 MW) did not. Overplanting was progressively eliminated [Appendix B, page 158].

This is not in anyone's interest, as Cleve Hill Solar Park demonstrates.

Cleve Hill (373 MWp) had an agreed export capacity of 350 MW. It started export at full power on July 8th 2025. It rarely achieves 250 MW.¹

If its inverters had been capped for a peak export of 250 MW (i.e. DC/AC ratio 1.5), 0.08% of its annual energy production would be sacrificed,² and NGET would have been spared having to install the additional 100 MW of substation capacity.



This real-world example illustrates why EN-3 promotes overplanting.

Electricity customers should not be funding NGET to install an additional 200–300 MW of unusable capacity at NG’s proposed Farmoor substation. PVDP (and whoever buys its DCO) should rejoice at the significantly reduced CAPEX of a sensibly spec’d BWSF substation and AC cabling network.

If the SoS is still considering approval of the BWSF proposal – with or without the OHA recommended panel reduction – the Applicant should be instructed to reinstate the DC/AC ratio and revise down the export capacity agreement (**Output at POI** in the Appendix). The SoS might consider a ratio of 1.3 to be the minimum acceptable.

Installed capacity	Modules	DC/AC Ratio	AC Before Loss	Losses	Output at POI
1422 MWp	2,122,410	1.6	890 MW	50 MW	840 MW
935.31 MWp	1,395,981	1.06	890 MW	50 MW	840 MW
Performance @ Ratio = 1.3					
935.31 MWp	1,395,981	1.3	719 MW	39 MW	680 MW
685 MWp	1,022,385	1.3	527 MW	27 MW	500 MW

¹ Data from [Flexon](#): combined peak generation for BM Units CLVHS-1 and -2.

² 373:250 = 1.5. First year energy loss = 0.03%; less (then nil) in subsequent years.