Supplementary objection on consumer bill savings and grid deliverability

Whitestone Solar Farm EN0110020

Interested Party Shane Oxer | Reference [redacted]
2 November 2026 | Revision 1

Summary

I maintain my objection. The Budget policy announced on 28 October 2026 makes overall bill reduction and grid connectivity explicit procurement objectives. I ask the examination to test the evidence for any Whitestone-specific affordability benefit, distinguish contractual dates from deliverable network capacity, and reconcile solar output, storage availability and equipment renewal with the claimed benefits. The applicant should provide an updated statement and the network delivery evidence needed to assess those claims. This submission distinguishes published facts from illustrative calculations and requests evidence, rather than asserting an established monetary loss to consumers.

1 Purpose and new policy evidence

1.1 This supplements my existing representations under [redacted]. It develops the grid-deliverability concerns already raised and adds the Budget announcement made after Procedural Deadline A. I request acceptance as additional written evidence and consideration within the examination of the project's claimed benefits.

1.2 HM Treasury's Budget 2026 states that government will ensure it "only procures clean power when it lowers bills overall and can connect to the grid". The central question is whether Whitestone would reduce the costs borne by electricity customers compared with meeting the same demand and reliability requirements without it. [P1]

1.3 I recognise the distinction between procurement/support decisions and development consent. EN-1 paragraph 3.3.14 does not require a development-consent value-for-money assessment; paragraphs 4.1.22-23 address applicant viability judgements. I seek scrutiny of benefits advanced for this particular proposal, under the planning balance in paragraphs 4.1.5-7, and an explanation of the relevance of the new policy. [P2]

1.4 The applicant should identify each project-specific bill-reduction claim, its supporting analysis, and any reliance on future public support. If necessary, I ask the Examining Authority to seek DESNZ's position on the Budget announcement's relevance. A general assertion that solar is inexpensive does not quantify Whitestone's net effect on customer costs.

2 Published project evidence and unresolved delivery

2.1 The Funding Statement estimates £500m-£600m for the combined development, including BESS and the project's own grid connection. This is prospective expenditure, not a verified subsidy or consumer charge. Shared reinforcement must be assessed separately using an explained attribution method; neither the whole regional upgrade nor an arbitrary project share should be assumed. [E1]

2.2 The climate assessment refers to approximately 44 TWh over 60 years, equivalent to about 733 GWh annually and 84 MW averaged across the year. These derived figures are not continuous output or an independently verified first-year yield. The 750 MW AC connection ceiling should not be treated as guaranteed generation. [E2, E4]

2.3 The proposed 60-year operating life includes equipment renewal. Table 5.10 supplies the following ranges. My 25-year module and 12-year battery cycles are reasonable sensitivities within those ranges, rather than fixed technical expiry dates. [E3]

Equipment	Applicant lifespan	Sensitivity
Solar modules	25-40 years	Renew in years 25 and 50
Batteries	5-15 years	Renew in years 12, 24, 36 and 48
Inverters	10-25 years	Separate renewal allowance required

2.4 The Environmental Statement already recognises component replacement, including replacement emissions in its climate inventory. I request reconciliation of the assumed renewal cycles, resulting output and environmental effects with the claimed lifetime benefits, including traffic, waste, carbon and restoration provisions. [E2, E3]

2.5 The August 2026 Grid Connection Statement records an earlier October 2029 agreement, a solar Gate 2 Phase 1 position up to and including 2030, and a separate BESS Gate 1 offer with the indicative date unconfirmed. The revised offer was expected in the second half of 2026. The latest executed position is therefore needed. [E4]

2.6 I request an integrated applicant/NGET programme identifying the necessary Long Lane bay, both relevant uprated line sections, terminal interfaces, protection, booked outages, testing and commissioning. It should identify the earliest usable partial and full solar export, and battery import/export, with capacities and restrictions. A contractual effective date is not evidence of completed electrical infrastructure.

2.7 An end-2031 network availability case should be tested, with 2032 as the first full operating year, alongside any earlier stage claimed by the applicant. The network owner should confirm the current programme and any recovery case. This sensitivity is not presented as an independently verified official energisation date. EN-1 allows planned network arrangements, while paragraph 4.11.12 requires appropriate arrangements to be or become available. [P2]

3 Evidence requested and examination action

3.1 I ask the Examining Authority to request a consolidated response addressing the following matters, with underlying assumptions and source documents.

3.2 Delivered electricity. Reconcile first-year and lifetime solar output with degradation, availability, inverter clipping, replacement downtime, curtailment and storage losses. Provide the seasonal/hourly evidence used to support project-specific benefits.

3.3 Battery contribution. Confirm MW, usable MWh, duration, losses, degradation and the latest connection position. Separate solar charging from grid charging and assess a solar-only operating stage if the battery is later. Avoid double counting services.

3.4 Costs and savings to customers. Where bill savings are claimed, compare customer costs and avoided purchases on a consistent demand/reliability basis, identifying support settlements, network recovery, balancing and incremental firm-supply costs. Reconcile these with project capital costs to avoid double counting financing transfers.

3.5 Dependable supply. Credit gas fuel and other generation actually displaced. Identify additional capacity, cycling and efficiency effects attributable to Whitestone. Existing costs required in both cases should remain common costs.

3.6 Whole-life delivery and mitigation. Explain component renewal costs and output assumptions, the environmental assessment of renewal works, and the enforceable maintenance, waste and restoration arrangements. Distinguish installation dates from first export where equipment could age while awaiting the grid.

3.7 Timing and planning weight. Reconcile current network readiness with claimed 2029/2030 benefits, assess later connection and phased operation, and identify any programme changes affecting cumulative construction impacts or secured mitigation.

3.8 Until these issues are answered, I ask that any additional Whitestone-specific bill-saving or early-delivery benefit is given only the weight justified by its evidence. This request concerns the evaluation of this proposal against its impacts; it does not assume that a later connection automatically removes the national need for low-carbon electricity.

Shane Oxer
Interested Party Reference [redacted]

4 Cost evidence and source references

Status of the cost evidence

4.1 The published construction estimate is not a whole-life consumer-cost assessment. A credible comparison would need verified support and purchasing terms, component renewal, attributable shared-network expenditure, operating costs, delivered output and displaced supply. It must identify who pays and which costs are already included elsewhere.

4.2 Illustrative cost screens can expose sensitivity to these inputs, but this representation advances no stand-alone monetary forecast of a loss to consumers. It relies on the published policy and application evidence below. The applicant is asked to substantiate any project-specific affordability claim using a transparent comparison which others can scrutinise.

Official policy

[P1] HM Treasury, Budget 2026, published 28 October 2026, Chapter 5, subheading Bringing down energy costs for business, paragraph beginning Cheap, clean power benefits billpayers. The relevant 15-word passage is reproduced in paragraph 1.2 above.

[P2] DESNZ, Overarching National Policy Statement for Energy EN-1, December 2025 edition, in force 6 January 2026: paragraphs 3.3.14, 4.1.5-7, 4.1.22-23 and 4.11.5-12.

Documents already in the examination library

[E1] APP-021, 4.2 Funding Statement, Revision 01, June 2026: paragraphs 2.2.1 and 2.3.4-5; printed pages 3-4.

[E2] APP-063, 6.11 Environmental Statement Chapter 11 Climate Change and Greenhouse Gas Assessment: PDF page 19 for the 44 TWh statement; printed pages 62-63 for lifecycle and replacement emissions.

[E3] APP-057, 6.5 Environmental Statement Chapter 5 The Proposed Development: paragraphs 5.6.1-2 and Table 5.10, printed page 24.

[E4] AS-062, 7.1.1 Grid Connection Statement, clean Revision 02, August 2026: paragraphs 5.1.2-5, printed pages 8-9.

[E5] APP-041, 5.8 Statement of Need, Revision 01, June 2026: Chapters 8-10, including network/economic curtailment and affordability arguments. These are the applicant's claims requiring the project-specific explanation requested above.

[D1] PD-004, Rule 6 letter dated 6 October 2026: Annex D draft timetable, Deadline 1 on 24 November 2026; Annex F AI directions; Annex H submission instructions. The final Rule 8 timetable will govern once issued.

Artificial intelligence declaration

OpenAI ChatGPT assisted with research, calculations, organisation and drafting throughout this supplementary representation. Its sources are the official policy and examination documents identified above. Factual propositions were checked against those texts; illustrative assumptions and unresolved matters are expressly identified. This is an interested-party representation, not independent expert testimony.