

**SUFFOLK ENERGY ACTION SOLUTIONS'****SEAS REBUTTAL of APPLICANT'S RESPONSE TO SEAS WR  
NEEDS CASE**

SEA LINK: EN020026

SEAS IP: [REDACTED]

DEADLINE: 3 – January 9, 2026

Date: 9 Jan 2026

RE: SEAS rebuttal of 9.79: Applicant's Comments on Written Representations [[REP2-034](#)]  
Page 363 to 378 - Table 2.42 Suffolk Energy Action Solutions – Needs Case [[REP1-281](#)] refers

**1. NEEDS CASE**

SEAS has reviewed the Applicant's response [[REP2-034](#)] to the SEAS Needs Case [[REP1-281](#)] and maintains that the Applicant has failed to properly engage with, or give due weight to, material and relevant facts underpinning the Needs Case. Instead, the Applicant's response relies on outdated data and historical circumstances that do not accurately reflect the current Application or the evidence before the Examining Authority.

SEAS therefore submits this rebuttal to address the material deficiencies in the Applicant's assessment of the SEAS Needs Case and to draw the Examining Authority's attention to what SEAS considers to be a serious misrepresentation of the evidence by the Applicant.

**2. Refs: 1-7, Table 2.42****2.1 The Applicant states that in the South East:**

*"Sea Link will address a shortfall in the capacity of the existing network in Kent to carry power out of the region at times of low wind and high interconnector imports. This is driven by the interconnectors landing in Kent due to its proximity to mainland Europe".*

Yet, as the Applicant's APP-320 Back Check Report clearly says on page 4, Para 1.4.7:

*"Peak demand by 2030/31 in the East Anglia area is anticipated to be approximately 1,281 MW (total for demand substations of Walpole, Norwich Main and Bramford and with only minor demand being consumed at Sizewell."*

**This means that generation in East Anglia will significantly exceed local demand, even before both Sizewell C reactors become operational towards 2040 with a further increase of about 2.839GW of scaled output into the region.**

**Given the clear & unambiguous statement by the Applicant of "only minor demand ...at Sizewell", what possible need can Sea Link satisfy by taking power from Kent to East Anglia as there will be a significant surplus there? The Applicant's "Need" is clearly a nonsense construct and is part of the sophistry being used by the Applicant, whenever it is demonstrated that the needs case presented in APP-320 is illusional. In the quoted circumstances of "high interconnector imports", the Applicant should be looking to move**

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**any such excess energy out of Kent to parts of the UK that need the energy, which East Anglia most clearly does not and will not at any foreseeable future time.**

2.2 The Applicant then turns to East Anglia and says:

*“Sea Link will support the connection of additional low carbon generation in East Anglia by providing an additional route for power to flow out of the region at times of higher wind. Sea Link has to connect in the Sizewell area in order to enable power flow from the generators connecting in this area (referred to as the Sizewell Generation Group) in a scenario where there is a fault between Sizewell and Bramford”.*

As SEAS has repeatedly demonstrated, the Sizewell Generation Group deficit is not 1852MW as has been misleadingly referred to throughout APP-320, but only **352MW** which can easily be accommodated by a reconductoring of the Sizewell to Bramford double circuit that will have to be done, in any event, before Sizewell C 's reactors are commissioned. Increasing the thermal and load capacity of the conductors of those double circuits can be accomplished easily, at an incremental cost of only £ tens of millions rather than £billions for Sea Link with two onshore HVDC converters etc

Even that small deficit amount only occurs if ALL of the connection contracts materialise (ie EA1 & EA1N, both Sizewell C reactors plus Sizewell B remaining in operation until 2055 plus 1.6GW for the LionLink interconnector).

2.3 In April 2025, NESO<sup>1</sup> acknowledged that the previous system of connection contracts often led to “zombie” contracts which would never be built or connected, ever.

At the time of this Sea Link DCO, there is no presumption that LionLink will ever be consented, as it is not part of any grid reinforcement, but rather a profit-driven arbitrage opportunity with electricity prices between the UK and European Mainland by a non-regulated subsidiary of National Grid, NGV. LionLink could be connected elsewhere, just as Nautilus was moved from Friston to the Isle of Grain in November 2024.

It's clear that if LionLink is not consented, then even approaching 2040, there will still be a sizeable surplus of almost 1.25GW available to export electrical energy from the Sizewell Generation Group, according to the data presented in APP-320.

2.4 So, the only case for believing there could be any deficit (which the Applicant is relying on to support its case for this Application) is to build a regulated ie consumer funded asset (Sea Link) but that would only be required to support the connection of an interconnector being proposed by National Grid Ventures for the arbitrage export of excess power from the region. **That is clearly a cross subsidy from public purse to private purse and wrong.**

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<sup>1</sup> <https://www.neso.energy/industry-information/connections-reform/about-connections-reform>

If LionLink needs to connect to the region for export arbitrage and that connection would create a deficit, then LionLink/NGV should be required to pay to rectify that deficit, not rely on the UK consumer to subsidise National Grid shareholder's profits.

### 3. Ref 24 -Table 2.42

3.1 The Applicant yet again restates (even though it knows this figure is wrong) that

*“The worst-case fault for the Sizewell Generation Group would indeed be a fault affecting one of the double circuits connecting Bramford to Sizewell. The needs case states a shortfall in capacity of 1,852MW based on the information taken from the NESO Transmission Entry Capacity (TEC) register and Interconnector register prior to the publication of APP-320.”*

So, even if it is accepted that there *might* have been technical or legal requirement to maintain the Nautilus fiction until late February 2025, there can be no excuse for maintaining that fiction into this Application. The Applicant knew that Ofgem had consented to Nautilus being moved from Friston as of 12 November 2024 that National Grid had published on its website as of 27<sup>th</sup> February 2025 that the Nautilus connection agreement in Suffolk had been removed. Yet, it maintained the fiction of Nautilus. That is a material deception and cannot be tolerated.

3.2 Finally, the Applicant admits

*“It is noted that the connection for the National Grid Ventures (NGV) Nautilus interconnector has been terminated and Nautilus’ 1,500 MW no longer contributes to the future power transfers out of this area.”*

Yet, the Applicant does not admit the need to revise or restate the purported Sizewell Generation Group Deficit. As SEAS have repeatedly shown, it is no longer 1852MW, but the very considerably smaller 352MW, which can be readily rectified even in a worst-case basis of every connection agreement being honoured. Even a capacity & load upgrade of the Sizewell to Bramford double circuit might not be required, if either LionLink or A N Other windfarm is not connected.

### 4. Ref: 29 – Table 2.42

4.1 Later, the Applicant tries to defend the misleading data contained in APP-320 by stating it

*“...is based on information correct at the time it was authored, prior to the submission of the application. Connection offers may be terminated, modified, or added to the relevant registers by NESO at any time, and this is kept under review by the Applicant. A shortfall in scaled generation of 352MW out of the Sizewell Generation Group nonetheless represents an issue that needs to be addressed. National Grid must comply with its transmission licence and meet requirements set out in the NETS SQSS, and this shortfall would be non-compliant.”*

See the SEAS response to Row 24 above.

4.2 The Technical team behind this Application would be well aware that the Sizewell to Bramford double circuit OHL will need to be reductored (their own document APP-320, & IET guidelines)

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before Sizewell C is commissioned. So, the limited worst case deficit of 352MW could easily be resolved at minimal cost, as compared to the £billions for this Sea Link project, not to mention the saving in the areas of ecology, economic damage to tourism, noise & vibration, traffic etc.

## **5. Ref: 30 – Table 2.42**

5.1 Despite the clear timelines shown by SEAS of Ofgem formally moving Nautilus from Friston on 12<sup>th</sup> November 2024 and the connection agreement being formally cancelled (and notified on the NG website) on 27<sup>th</sup> February 2025, the Applicant still seeks to defend its reprehensible behaviour and duplicity by stating:

“The Nautilus interconnector had a connection offer at Friston until March 2025 (weeks before the submission of the Sea link DCO application and after Application Document 7.2 Strategic Options Back Check Report [APP-320] was finalised), meaning that NGET was required under its licence to consider a potential Nautilus connection at Friston.”

This is a clear example of how the Applicant had made its decision and stuck rigidly to key assumptions made years earlier, in the face of the current (and relevant) facts.

5.2 This is not the only example the ExA will have encountered- Alternative Sites is another glaring example of the failure by the Applicant to be open-minded & undertake appropriate due diligence, plus ignoring local expert guidance from SCC and ESC and National Highways about the adverse traffic implications of its chosen site & especially Benhall Bridge.

## **6. Ref: 35 – Table 2.42**

6.1 The Applicant states:

*“The Sea Link application was submitted in March 2025, not June 2025. The Nautilus interconnector had a connection offer at Friston until March 2025. The inclusion of Nautilus was not an error, as set out in the response in row 30”.*

It's deeply regrettable that the Applicant simply cannot acknowledge its failure to update its APP-320 document to include the decision by Ofgem to move Nautilus to Grain in November 2024, acknowledged by its parent company National Grid on its website on 27<sup>th</sup> February 2025. Even if there were some “technical/legal reason why it was still shown even in March the Applicant knew the reality and should have presented the future of the Sizewell Generation Group deficit clearly and unambiguously to the ExA, rather than an underhand attempt to deceive.

## **7. Ref: 41 – Table 2.42**

7.1 The Applicant states:

*“A shortfall in scaled generation of 352MW out of the Sizewell Generation Group represents an issue that needs to be addressed. This does not change the conclusions of the needs case. Furthermore, depending on the realistic scenarios that may occur when considering the Sizewell Generation Group on a more local level, the capacity deficit may indeed exceed 352MW (see the response in row 29).*

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SEAS's previous Needs case RR-5210 dated 9 December 2025, showed on pages 13 & 14, paras 49 to 53 just how this worst-case deficit of 352 MW can easily be met at minimal incremental cost and practically no environmental or societal damage, yet the Applicant continues to ignore such details and "ploughs-on" regardless.

7.2 In the interest of brevity (and the eyesight of the ExA), SEAS will not repeat its case any further, despite the Applicants repeated restatement of the same points later in their response.

## **8. Conclusion**

For the reasons set out above, SEAS submits that the Applicant's assessment of need does not adequately engage with the relevant and up-to-date evidence and, does not provide a reliable basis upon which sound conclusions on need can be drawn. SEAS respectfully invites the Examining Authority to take these matters into account when considering the weight to be attributed to the Applicant's assessment, alongside the evidence submitted by SEAS, in its examination of the Proposed Development.

end

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