

To: The Rt Hon Miatta Fahnbulleh MP, Secretary of State for Energy Security and Net Zero

c/o: Energy Infrastructure Planning Delivery Team, Department for Energy Security and Net Zero (DESNZ)

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PINS Project Reference: EN020026 (Sea Link)

Submission Category: Response to the Secretary of State's Request for Information (RFI) of 28 August 2026, and Urgent Post-Examination Representation

Interested Party Reference: Rhett Griffiths (IP Ref: [REDACTED])

Date: September 2026

Dear Secretary of State,

RE: URGENT NEW EVIDENCE ON SEA LINK (EN020026) – £2.9BN CONSUMER SAVING, INCOMPLETE APPLICATION, AND UNRESOLVED GRID RISKS

I am writing following your letter of 28 August requesting further information on the Sea Link DCO. While individual questions were addressed to specific bodies, I feel compelled to submit this representation in light of two major official reports published in September 2026: Ofgem's Sea Link Project Assessment (1 September 2026) and the National Audit Office (NAO) Report *Upgrading the electricity transmission network* (11 September 2026).

On *The Martin Lewis Money Show* this week, you rightly acknowledged that energy is an everyday essential and stressed that we must reform the system so that every part works in the interest of consumers. That commitment mirrors the joint open letter from DESNZ and Ofgem ([REDACTED]) which made clear that network delivery must protect consumers and deliver genuine value for money.

The new evidence shows that approving Sea Link in its current form fundamentally undermines that principle: it commits bill payers to a confirmed £3.2bn outturn for an asset with unresolved technical operability defects, tipping the planning balance decisively against consent when a deliverable onshore alternative exists that saves consumers £2.9bn.

1. Ofgem's Updated £3.2bn Cost vs. £300m Alternative Transforms Planning Balance

During the Examination, National Grid Electricity Transmission (NGET) presented an early capital baseline of approximately £1.15bn (in 2018/19 prices). While DCO procedures allow applicants to use historical baseline estimates, the recent update of actual project cost is critically relevant to your statutory decisions under the Planning Act 2008.

On 1 September, Ofgem's Project Assessment confirmed that the actual consumer cost exposure for Sea Link is £3.2 billion (at 2023/24 prices), confirming the estimated cost figures of >£3bn that Suffolk Energy Action Solutions (SEAS) put forward during the Examination. This nearly triples the costs at risk for consumers and fundamentally transforms both the government's energy policy (NPS EN-1) requirement that network solutions must be economical and efficient, and the core requirement of the Planning Act

2008 to balance public benefits against adverse impacts on communities and the environment.

Throughout the Examination, SEAS presented fully costed evidence for an alternative onshore solution, upgrading the existing pylon corridors in Suffolk and Kent. This would achieve a full security standard compliant solution for under £300 million.

Choosing this alternative onshore solution would give an immediate saving in excess of £2.9 billion, equivalent to c.£100 for every household. A saving of this scale would provide direct, long-term relief to help offset recent price cap increases hitting family budgets. Crucially, because Sea Link's £3.2bn cost has not yet been locked into consumer bills, you have a clear and timely opportunity to intervene before this multi-billion-pound liability is sealed for decades to come. Taking decisive action now would give the Government a tangible, highly visible demonstration of taking action to protect consumers, showing that ministers are prepared to step in and stop unnecessary infrastructure costs before they hit people's pockets.

2. An Unresolved Technical Defect Excluded from the Application and Examination

Ofgem's report highlights a critical "Harmonics Issue" that was never revealed to the Examining Authority or participants during the DCO examination.

NGET cannot guarantee that the project can operate stably under all network conditions. Electrical distortion from Sea Link risks equipment failures across the wider grid network. Because the reliable capacity of Sea Link cannot be guaranteed, system operators cannot depend on it to relieve power bottlenecks during an ordinary power line fault, leaving the project unable to guarantee compliance with national grid security standards. As Ofgem warns, if the link must be restricted to protect the network, it fails to deliver the core benefits consumers are being forced to fund.

National Grid also admits that to run at capacity, it will need to carry out further unspecified works elsewhere on the grid. These external, off-site works were excluded from NGET's DCO application. They have never been located, designed, costed or assessed for environmental impacts on communities. Approving a project that relies on undefined, unassessed additional infrastructure elsewhere on the grid network bypasses the scrutiny intended by the planning system.

3. NAO Report, Stale Figures and Systemic Regulatory Failure

As a recap for context, NGET's original case relied on a 1,852MW deficit linked to the Nautilus interconnector. Ofgem formally relocated Nautilus four months *before* NGET submitted its DCO application, yet in full knowledge of that change, NGET left Nautilus in its calculations. The correct residual worst-case deficit is 352MW (as admitted by NGET during ISH1), and will not arise until the late 2030s. NGET pressed ahead with a multi-billion-pound link designed for a deficit that had largely disappeared; this runs directly contrary to its transmission licence duty to develop economic and efficient solutions. In addition, SEAS demonstrated that NGET also failed to reflect other planned network upgrades (e.g. Bramford-Twinstead, Norwich-Tilbury), which if included mean that any deficit disappears.

The recent National Audit Office (NAO) report confirms a systemic regulatory oversight failure. Nobody is checking whether these multi-billion-pound grid upgrades actually make sense for bill payers. The NAO revealed that projects funded by consumer bills went ahead without a full business case, proper options appraisal, or testing of cheaper alternatives by the government, Ofgem, or the system operator (NESO).

NESO has failed to update the network configuration required for Clean Power 2030 following the material change of Nautilus's relocation, and refused to update constraint figures, judging them 'not necessary to support planning decisions'. What is NESO's job if not to ensure the network plan is up to date, economic, and efficient? In turn, despite updating project costs, Ofgem did not independently update constraint costs (surely relevant if project costs are) or scrutinise the need for a project still mistakenly treated as 'fast-track'.

In short, not one public body has independently tested whether Sea Link is still needed, or whether it offers value for money compared to a simpler onshore alternative. This is a visible opportunity for Government to begin to reform the system to better serve consumers.

4. Conclusions and Requests

I urge you to refuse development consent for two fundamental reasons:

- **An incomplete application:** As Ofgem's findings make plain, NGET has submitted an incomplete application. Sea Link cannot deliver its promised capacity without undefined, unassessed off-site works elsewhere on the grid. Consent cannot be lawfully granted for an incomplete scheme, when the full cumulative environmental and community impacts have never been subjected to statutory planning scrutiny.
- **Unjustified cost and lack of need:** The applicant has failed to demonstrate that this project is economic, efficient, or necessary when compared to deliverable onshore alternatives.

If you are not inclined to refuse consent immediately, natural justice and good governance require you to pause your decision and use your powers to direct that the missing facts are put on the record:

1. **Require NESO** to provide an up-to-date, transparent assessment of actual grid capacity and revised constraint cost figures, properly reflecting that Nautilus is no longer landing in Suffolk alongside committed onshore upgrades.
2. **Require Ofgem** to publish an updated, project-specific Cost-Benefit Analysis reflecting the confirmed £3.2bn outturn against current network conditions, rather than relying on outdated assumptions.
3. **Require NGET** to formally identify the scope, location, and environmental impacts of the off-site infrastructure needed to fix these stability defects. This will confirm whether this situation requires a formal reopening of the Examination or a separate DCO to prevent unlawful 'splitting' of the project.
4. **Commission an independent review** comparing the cost, delivery speed, and environmental impact of the <£300m onshore alternative against this £3.2bn scheme, ensuring you have the verified facts before any irreversible decision is taken.

Yours sincerely,

Rhett Griffiths

Interested Party Reference: [REDACTED]