

OFFICIAL

From: Andrew Snowden MP [REDACTED]@parliament.uk>

Sent: 11 August 2026 11:47

To: DESNZ Correspondence <correspondence@energysecurity.gov.uk>

Subject: RE: Cllr Keith McKay, [REDACTED] (Case Ref: AS14112)

Dear all

Further to my previous correspondence, please find attached the document provided by my constituent, Cllr Keith McKay, containing his correspondence with the Chair of Ofgem.

I would be grateful if this could be considered alongside the information already provided.

Many thanks, and I look forward to hearing from you.

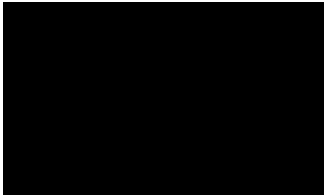
Kind regards

Andrew

Andrew Snowden MP

Member of Parliament for Fylde

House of Commons, London, SW1A 0AA



Sir Lindsay Hoyle, MP
Speaker,
House of Commons,
London, SW1A 0AA

13th July, 2026

Dear Sir Lindsay,

Concerns Regarding a Possible Systemic Oversight Failure of Ofgem's Current Approach to Energy Connection

I have been trying to have a dialogue with  regarding observations about the performance and behaviour of Ofgem in relation to the handling of ongoing NSIP electrical power generation projects.

My initial contact was dated 28th February 2026, to which a reply from his department was received on 30th March, but which totally failed to address the question raised by myself and merely recited information that had already been published in response to queries made during examination of the Morgan & Morecambe Wind Farm Development Consent Order application, which is still ongoing.

I therefore sent a second letter on 6th April 2026, spelling out clearly what my concerns were, with copies made to the Ofgem Board members.

A copy of this second letter is included with this letter at attachment 1.

I still await a response to this second letter.

As a consequence, the letter at attachment 2 was delivered to Ofgem on 13th July 2026 requesting an answer.

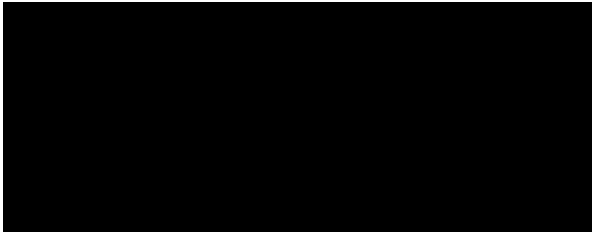
The absence of a response, combined with some of the statements that have recently been made in Parliament and as reported in the Press, could lead me to a conclusion that there are indeed systemic process issues and a level of "group think" involved. If so, this has serious implications and not just for my particular area of concern, which relates to Lancashire and the Fylde.

It would appear that the declared objective of reducing cost to the end Customer has been lost in the process of achieving the goal laid down by the Electricity Act 1989 - Section 9, i.e. to develop and maintain an "efficient, co-ordinated and economical system of electricity transmission".

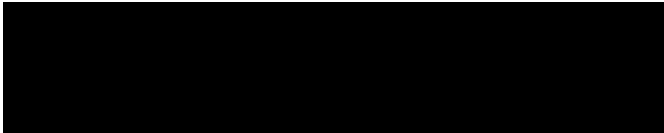
Clearly, the available evidence points the opposite direction of increasing energy costs unnecessarily, with options for reducing costs to the Consumers being ignored.

Can I ask that, in your role as process owner for the procedures that should be followed, you can obtain the clarification requested by myself?

Yours Faithfully,



Consultant Engineer,
Freckleton Parish Council Member



cc: Rt Hon Bill Esterson, MP, Chair, Energy Security & Net Zero Committee
Rt Hon Andrew Snowden, MP, Fylde

Attachment 1

For the Attention of [REDACTED] cc. Ofgem Board Members

Chair, Ofgem,
10 South Colonnade,
Canary Wharf,
London, E14 4PU

7th April 2026

Concerns Regarding a Possible Systemic Oversight Failure of Ofgem's Current Approach to Energy Connection

Dear [REDACTED]

Introduction

I thank you for the response to my letter of 28th February 2026, received on 30th March 2026 via e-mail.

However, I must express my profound disappointment with the response. The answer provided by Mr Ward has not addressed the issues raised to Ofgem as the sector regulator. I ask once again that the points that have been raised are actively addressed in the limited time left. Ofgem may otherwise be faced with defending wholly avoidable "costs to the consumer, investors, economy and sustainable development", as well as failing to realise economic growth and risk losing opportunities in delivering Net Zero.

There appear to be systemic issues at multiple levels across the sector, that urgently need addressing.

The key issues and questions that I raised remain unanswered. Is anyone taking a complete overview of where the system costs that find their way to the consumer costs of living are being incurred?

The answer received demonstrates to me that this is not happening and therefore there is a systemic problem, in that no one is taking a wider view of the possibilities that exist and the resultant options for saving significant costs that will be passed on to the Consumer. This applies to Ofgem as the overseer and to NESO as the responsible design organisation.

It is noted that Mr Brearley has now left Ofgem and it is possible that some may feel compromised due to his new position. It was however noted that Ofgem advertised that it was strengthening its Board in 2023 with the appointment of **5** new members. To ensure you have support in positively addressing the points raised, I have shared this letter with those Board members. In recognition of Ofgem's accountabilities to Parliament, I have also shared this with the ESNZ Select Committee, the Speaker of the House of Commons and the Lord Speaker. I aim then to update the Parliamentary members once I have received your response in accord with the Civil Service Code and undertakings on the Ofgem website.

My original letter of 28th February makes clear that I understand what Ofgem is accountable for which including ensuring that NESO are meeting the requirements of minimising costs overall, whilst maximising the ability to achieve the Net Zero aspirations whilst encouraging growth and regeneration.

From other investigations and questions, I had already understood how the HND had been carried out and how the results had been used.

This process is partly the cause of the current concerns as the initial HND assumptions were flawed in relation to this locality of Northwest Lancashire. The underlying assumptions have never been reviewed for correctness or current validity, as should be good practice prior to engaging on the next steps of the development cycle leading to the current examination.

For example, had the guidance and requirements of the NPS been fully assessed and applied, the proposed transmission access route for the Wind Farms that have given rise to the questions would never have been permitted to follow the proposed route as they would have infringed on the selection criteria that has been laid out. Blackpool Airport would have been rated as Red, whilst the adverse impacts of the risk of death from bird strikes associated with the military air activity conducted at Warton Aerodrome would have been rated as Black under the criteria defined in the HND. In addition, Mooir Vannin was not included in the HND, and the joint Morgan and Morecambe Transmission Assets proposals do not comply with the HND criteria or assumptions relied upon for its output.

No account had been taken of the existence of the Hillhouse Technology Enterprise Zone, the 138 hectare site, created in 2016, is already designated for re-development, including projects aimed specifically at energy generation and storage.

Part of the Stanah Substation and Walney 2 offshore wind energy connection system infrastructure sits within the Hillhouse boundary. The site already has 400kV power lines to both Heysham and Penwortham. This is clearly known to the industry, NESO, National Grid, Ofgem. It has been approved nationally and forms an integral part of local and regional economic and development plans.

Prioritising the reinforcement of the existing infrastructure, in accord with NESO CP2030 advice to Government, including new substation facilities at this site would be significantly cheaper and more cost effective than three sets of 30km buried underground cables, especially as it has now been shown that Penwortham also would need expansion to accommodate the proposed developments.

If the Hillhouse option were to be adopted, then the expansion of Penwortham is no longer a necessity and would offer Net Zero growth opportunities to an area of national levels of socio-economic deprivation, referred to in both local and regional economic development plans. This is an apparent failure to comply with the HND.

Sadly, the regional energy strategic planning processes, which should have identified these issues, had would appear not to have been completed before the current projects entered the detail application stage. With the information that has become evident through the project planning processes, this could have and clearly should have continued to be acted upon. The result is counter to Ofgem's stated required outcomes, as it takes no account of an obvious material alternative option which offers significantly lower cost.

I note that Mr Ward refers to "Regional Energy System Plans". I assume he means the NESO Regional Energy Strategic Plans, but perhaps you could clarify if that is not the case. There already exist Local and regional development & growth plans. It remains unclear why these do not appear to have been consulted at the outset and to date.

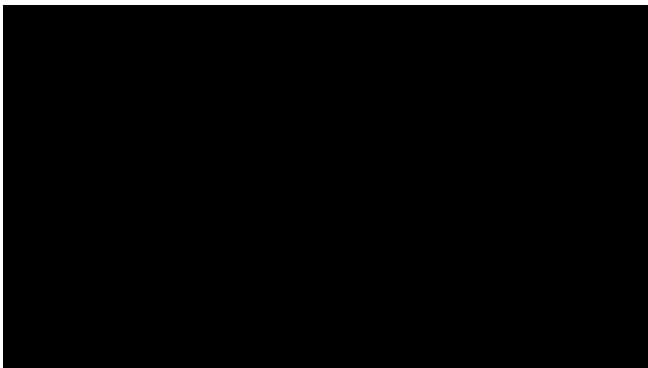
There also appears to be a misunderstanding of what the Sandbox technique is appropriate for. The system is commonly used in many areas as a means of overcoming problems via examination of alternatives to an existing proposal. It does this by examining the alternatives off-line from the

mainstream in an environment where the alternatives may be prototyped and assessed. Then, if deemed suitable, a mature design can be inserted into the relevant development programme at the appropriate stage of the Design Life Cycle. Its adoption will assist the sector's continuous improvement requirement and precludes development being delayed due to avoidable constraints. The approach is globally adopted and included within the UK Government and Ofgem, but for more details see "How Big Things Get Done"¹.

In summary, I reiterate, that there appear to be systemic issues at multiple levels across the sector, that urgently need addressing.

I look forward to hearing from you shortly replying to the points I have originally & herein raised. I repeat my offer of engaging with you so that these matters can be resolved positively in the interests of consumers and our country."

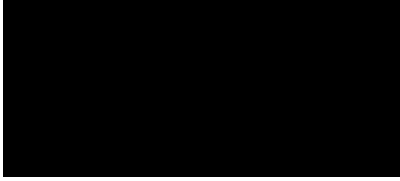
Yours sincerely,

A large black rectangular redaction box covering the signature and any accompanying text.A series of five black rectangular redaction boxes of varying sizes, likely covering contact details such as a phone number, email address, and company name.

¹ How Big Things Get Done – Bent Flyvbjerg and Dan Gardner, Macmillan Business Press, Published 2023

Attachment 2

For the attention of 



10th July, 2026

Chair, Ofgem,
10 South Colonnade,
Canary Wharf,
London, E14 4PU

Re-Concerns Regarding a Possible Systemic Oversight Failure of Ofgem's Current Approach to Energy Connection

Dear 

I last wrote to you on this matter on 6th April 2026 and, as yet, I have still to receive any response whatsoever.

Given your silence and the combination with reports in the press regarding the overall situation regarding Energy Supply and the Grid Balancing, I can only arrive at the conclusion that there is something in the concerns that have been raised.

As a direct consequence of your or your team's failure to engage, I am also copying this letter to Rt Hon Sir Lindsay Hoyle MP, Speaker of the House of Commons, Rt Hon Bill Esterson, MP, Chair of the Energy Security and Net Zero Committee and Rt, Hon Andrew Snowden, my local MP, requesting their assistance in either extraction of an answer or some form of meaningful engagement.

Kind Regards,



Consultant Engineer
Member, Freckleton Parish Council