

Scottish Hydro Electric Power Distribution

Operation, Inspection, Maintenance and Decommissioning Strategy

ED2 Loch A' Choire

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1. Definitions and Abbreviations

The following definitions are used within this document:

SHEPD	Scottish Hydro Electric Power Distribution plc
SSEN	Scottish and Southern Electricity Networks
Cable	SHEPD submarine electricity cable network
Coiling	Where the submarine cable is wrapped in a circular manner for storage or transportation
Mechanical Strength	The physical capacity of the submarine cable to undergo forces generally in tension (horizontal, lifting) or compression (vertical weight above the cable)

The following abbreviations and definitions may be used within this document:

AUV	Autonomous Underwater Vehicle
CFLO	Company Fisheries Liaison Officer
HDD	Horizontal Directional Drill
KIS-ORCA	Kingfisher Information Service Offshore Renewables and Cable Awareness
LAT	Lowest Astronomical Tide
MBES	Multibeam Echosounder
MCA	Maritime and Coastguard Agency
MLWS	Mean Low Water Spring
NLB	Northern Lighthouse Board
ROV	Remotely Operated Vehicle
RPL	Route Position List
SBP	Sub Bottom Profiler
SSS	Side Scan Sonar
UKHO	United Kingdom Hydrographic Office

2. Introduction

2.1. SHEPD propose to replace two existing cables in Loch Linnhe at Loch A'Choire as the existing cables have been identified as requiring replacement following asset inspections. Two longer 33kV cables are proposed to be installed to allow for removal of 4 km of Overhead Lines (OHL) on each circuit, the majority of which is inaccessible and unmaintainable.

2.2. The purpose of this document is to outline our strategy in relation to the following aspects of the project:

- Operation: Following installation of the cables, connection and energisation to the SHEPD network.
- Inspection: The visual inspection or tracking of the cables following installation.
- Maintenance: Remedial works driven by condition-based information following inspections in the marine, inter-tidal and/or land environments.
- Decommissioning: Follows de-energisation of the cables at the end of its operational life.

2.3. This document should be read in conjunction with the Marine Construction Licence pack.

3. Operation strategy

3.1. Following successful completion of the cable installations within both marine and land environments, the cables will be commissioned and energised onto the SHEPD network. Under normal operation, the cables will remain energised until replaced or following a fault occurrence on the cables or network itself (this includes onshore faults). The cable(s) may also be de-energised to carry out planned maintenance on the cable or SHEPD network.

3.2. The effects of cable operation on the environment are covered within the *Marine Environmental Appraisal*.

4. Inspection strategy

General

4.1. As part of the planned cable replacement, as-built records will be prepared and recorded as part of the project handover documentation. This will form the baseline data for the cables. This is also applicable for any planned maintenance or emergency repairs on the cables.

4.2. Following installation of the cables, our inspection strategy will be used to monitor the behaviour and integrity of each cable. Each subsequent inspection will help to build a better understanding of operational risk and condition of the cables. This will therefore dictate the ongoing maintenance plan and influence cable replacement decisions.

Cable inspections - Offshore

4.3. The cable inspection in the marine environment allows us to record:

- accurate cable position
- any degradation, damage, exposure, suspensions, burial or other significant events which may affect the integrity of the cables
- external condition of the cables, including any external protection in place
- condition of any cable crossings including third party crossings
- depth of burial, both in terms of adjacent seabed levels and absolute levels
- visibly locate any debris in contact or close proximity to the cables

4.4. Asset monitoring inspections include geophysical surveys comprising the following methods:

- Multibeam Echosounder (MBES)
- Side Scan Sonar (SSS)
- Video and still images
- Magnetometer
- Cable tracker

4.5. The surveys and inspections will utilise either vessel-based instruments or traditional methods such as divers. Survey platforms may also include Remotely Operated Vehicles (ROVs), Unmanned Surface Vehicles (USVs) or Autonomous Underwater Vehicles (AUVs) which have been equipped with suitable sensor packages.

4.6. The frequency of marine inspections will be risk dependant; based on ongoing gathering of asset data and network operational risks. We typically undertake an as-built survey as part of cable installation activities to firstly ensure the installation meets the expectations of our own internal standards and specifications and those of Marine Directorate but also to ensure the safety of navigation for legitimate users of the sea.

4.7. All subsequent inspections are proposed to take place within a period of four to eight yearly intervals. Following any evidence of wear/abrasion or interference, the frequency of inspections may be increased. No repeat surveys will be conducted on cables already determined to be in critical condition and where previous surveys have demonstrated that no useful data can be acquired due to environmental conditions.

4.8. Survey timing within any year may be influenced by restrictions relating to environmental considerations including breeding seasons for marine and coastal ecological features. An assessment of potential impacts of survey operations on marine and coastal ecological features and designated sites will be undertaken with appropriate mitigation measures identified where necessary. The assessment will be used to support applications for European Protected Species (EPS) and Basking Shark (BS) licenses where a requirement for these has been identified.

4.9. Route Position Lists (RPLs) of cables and landfall locations will be communicated to the UKHO and KIS-ORCA in order that relevant charts are updated and disseminated.

4.10. Prior to the commencement of, during and after any route surveys or cable inspections, the Company Fisheries Liaison Officer (CFLO) shall establish and maintain effective communications between SHEPD, any contractors or sub-contractors, and legitimate sea users and this is documented in the *Fishing Liaison Mitigation Action Plan*.

Cable inspections – Onshore

4.11. We will ensure that shore end condition inspections are undertaken for all our cable locations. This will include the warning signs/beacon. For cable shore ends, or landfalls, inspections are proposed to take place once per year throughout the operational life of the cable. The inspection will be undertaken during a period of low water after spring tides to ensure that any cable exposure has been captured down to the MLWS limit.

4.12. During this inspection, the cable warning markers at the landing sites will be inspected for condition to ensure that they are fit for purpose and if necessary, replaced and thereafter maintained in good condition.

4.13. Where we observe a requirement for increased shore end inspection frequencies, we shall modify our practices as required.

5. Maintenance strategy

5.1. Maintenance requirements are driven by physical information gathered on our assets. This information is obtained through inspections of our cables both in the marine environment and at shore end landfall locations where the cables come ashore.

5.2. Maintenance solutions will be project dependant on the nature of the issue. We will enter into discussion with Marine Directorate and relevant parties to determine the licencing and communication requirements for undertaking any maintenance or remedial works where necessary through the operational life of the cable.

5.3. Where our inspection programme identifies that either cable has become a danger to navigation or protection of legitimate users of the sea, we will immediately inform Marine Scotland, Maritime and Coastguard Agency (MCA), UKHO, Northern Lighthouse Board (NLB) and KIS-ORCA to communicate the hazard to the maritime community.

5.4. Where shore end landfall inspections reveal that either cable is exposed down to the tidal level of MLWS, we will enter into discussion with Marine Directorate and relevant parties to determine the licencing and communications required for undertaking any remedial works where necessary.

5.5. We will ensure that appropriate steps are taken to minimise disruption and damage to the beach, foreshore and seabed by any remedial works and aim to restore to the current condition prior to the works commencing.

6. Decommissioning strategy

6.1. The existing Loch A' Choire cables have been identified as being at the end of their operational life during routine inspection, but as of February 2025 remain live, in-service cables. Upon commissioning of the replacement cables, the existing Loch A' Choire cables will remain in-situ with the exception of those sections required to be removed to facilitate installation of the replacement cable, for the reasons provided below.

6.2. Where a cable is in poor condition, cable recovery operations can be very difficult due to a lack of mechanical strength and coiling ability. Where mechanical strength of the cable is compromised the lifting operation will likely cause the cable to break. If rock bags or concrete mattresses have been utilised, cable recovery is further complicated as these would also have to be moved and/or recovered.

6.3. The operations are time consuming to undertake resulting in increased offshore working for personnel involved and vessel presence in the marine environment.

6.4. The physical cable handling on board the vessel is hazardous to personnel involved with the recovery operations. It is not possible to re-coil the cable on board the recovery vessel. Once the cable is recovered on-board, this would need to be cut into shorter, manageable lengths.

6.5. In situations where an existing cable is not recovered, there is the potential for the cable to present a navigational hazard to mariners and sea users. To manage this potential health and safety issue, periodic inspections are required to ensure the cable does not pose a risk to snagging. The position of the cable can also be accurately recorded and updated onto navigational charts. The expenditure incurred through continued inspection of the cables is assessed in relation to the cable recovery costs within the Cost Benefit Analysis model.

6.6. Similarly, to cable recovery, cable dismantling is a difficult and hazardous task requiring a large space on land. With the cable cut into sections, there will be numerous lifting operations to deliver the cable to a disposal contractor. The dismantling of the cable is difficult due to the cable's physical construction and layered design. The costs incurred for dismantling of the cable greatly outweigh the conductor material scrap value.

6.7. With the high costs associated with a cable recovery and disposal operation, the overall project costs would increase and the representative element of SHEPD distribution customer's bills. The socio-economic impact of this has been modelled in the Cost Benefit Analysis and informs our engineering decision making.

6.8. An additional important consideration for the removal of cables is the environmental impact and disruption that can be caused by the cable recovery process due to the length of time that the asset has been in place. We have heard conflicting views from statutory stakeholders in relation to cable recovery operations. Stakeholders have recognized that recovering cables may lead to more damage to the environment than leaving the cable in-situ particularly in areas with sensitive habitats and marine features.

6.9. A grapnel (cable hooking device) will likely be needed to intentionally snag the cable for recovery to the vessel. The grapnel is much smaller than most commercial fishing gear and is pulled across the seafloor. If existent, seabed vegetation may be uprooted in a very narrow corridor defined by the grapnel size.

6.9.1. In summary, based on these issues and potential effects, SHEPD propose that the existing cables will remain in-situ. We will continue to inspect these within the marine environment and at shore landfall locations.

For the replacement Loch A' Choire cables which are subject to the present Marine Licence application, a decommissioning plan shall be developed at the end of their economic life. This shall be submitted to the regulator for their approval.