



RWE Renewables UK Ltd
Robin Rigg Offshore Windfarm
Robin Rigg Operations Facility
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RWE Renewables UK Ltd

Ref.	MS-00009035
Contact	Colleen Owens
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1212/08/2024

Request for Marine Licence Variation
Reference: MS-00009035

Dear Claire McGregor

Following on from recent consultation on the 19 June 2024 with Marine Scotland, Robin Rigg Offshore Windfarm (RROW) formally requests a variation to the Projects Marine Licence MS-00009035 - Potential export/inter-array cable replacement works. Original licence was granted under ML 05442/150. The below variations are requested:

1. Inclusion of Cable Repairs as per the original Marine Licence Application (MLA)

The original application proposed “cable testing, de-burial, jointing and removal of defective cable, cable laying, ploughing/trenching. Cable protection installation as required.” The later variation to MS-009035 was to vary the Licensee name and correct cable copper core from 32kV to 132kV and to extend the expiry date of the licence from 05 November 2020 to 05 November 2035. It was not identified on either of these licences that 2.3 Description of the Licenced Activity title only included cable replacement. “

5.4 of the Method Statement (September 2013) that accompanied the MLA describes the ‘Cable repair length inserted into array cable operations’ and 5.5 of the same Method Statement describes the ‘replacement of the entire Array Cable’. Depending on factors such as the length of the faulted inter array cable, proximity of the fault to the turbine and age of the cable at time of the fault, a technical and economic decision would be made on the repair strategy for either cable repair or full cable replacement. Therefore, the inclusion of both repair and replacement option is imperative to reduce the down time of the cable and regain RROWs ability to gain full production availability to transmit electricity.

For both repair and replacement, deburial of the cable is required. With repair being a short section of cable unburied to a full cable deburial for cable replacement. The cable repair requires cable joints to connect the new section of cable to the current cable. For both repair and replacement, the cable will be lowered down to the required burial depth. Various

systems such as Mass Flow Excavator (MFE), Standard trencher using a chain cutter or Controlled Flow Jetting may be used for trenching repaired/replaced cable depending on suitability for the seabed conditions. The activities described in the existing licence will comply with the methodology presented within the original MLA, (as confirmed in the Method Statement 2013), however a different contractor and vessel may be employed to carry out the work.

Vessel types and anchor spread are included in the Method Statement (September 2013) that accompanied the MLA under section 3. Vessels and Equipment, however under section 5 Method of Work, it only refers to the Forth Guardsman and a 4-anchor spread. We would like to highlight that as per the “Vessels and Equipment” list, there will be various vessels and varied anchor spreads used for the repair and replacement works.

RROW is ultimately responsible for all the work carried out at the RROW site and are responsible for any contractors undertaking work at RROW on their behalf. RROW will request and review Risk Assessments and Method Statements for all work carried out by contractors at RROW from an environmental, health and safety, licencing and technical perspective to ensure an acceptable risk level.

The already licenced materials and volumes to be used for cable replacement or repair does not require an amendment.

2. Removal of “Export Cable” from the description of works

The description also includes export cable replacement. This is not required as there is a marine licence in place for the export cable repairs/replacement L/2015/00209/1, granted by the Marine Management Organisation.

3. Amendment of the required submission timeline of the decommissioning plan from 2 years to ‘6 months prior to the end of life of the licenced works’, to align with the Section 36 consent.

The marine licence states:

05442/150 Part 2 Condition 26 *The Licensee shall two years prior to the end of life of the licenced works, submit a decommissioning plan to the licencing authority for approval. The plan shall be based on the best practise at that time...*

RROW would like to request alignment of this condition with the corresponding wording for a decommissioning plan, which includes for the export and array cables, within the Section 36 consent:

Condition 6.14 *...No later than six months from the expiry of the six-month cessation period or within such variation of this timescale as the Scottish Ministers shall agree in writing, the Company shall produce a scheme of works for all restoration works. For approval by the Scottish Ministers in consultation with such other parties as the Scottish Ministers shall deem appropriate;*

Condition 6.14 *No later than six months before the expiry of this consent, unless a further consent is granted, the Company shall place before the Scottish Ministers a decommissioning and restoration plan and scheme of restoration works for their written approval in consultation with our RRMG and any other party as they so direct.*

Please review our request to vary the description of licenced works to "Potential inter-array cable repair and replacement works, Robin Rigg, Solway Firth "and to align the decommissioning plan submission timeline to the Section 36 timeline of 6 months prior to end of life such that production and agreement of documentation can be aligned. RROW are continuing to engage with relevant authorities on decommissioning requirements such that production of relevant applications and documents are in accordance with regulatory requirements.

[Redacted]

Yours Sincerely,
Colleen Owens
Consent Manager
RWE Renewables UK