

17th June 2020

Dear Mr Norman

## **Shetland Transmission Project: Consultation on Final Needs Case and Delivery**

I have read this consultation document and my responses are set out as follows;

Question 1: What are your views on the generation scenarios developed and updated by SHE-T? We are particularly interested in views on the likelihood of wind generation on the Shetland Isles developing to the levels predicted by SHE-T's scenarios and any further changes or updates since SHE-T's October 2018 Final Needs Case submission that you think should also be considered.

Viking Energy Wind Farm should not be constructed for a whole range of reasons from environmental destruction to the welfare of the people who live in or near the proposed project.

Destruction of carbon-sink peat bogs defeats the object of wind energy generation. The infrastructure that would be required, let alone the turbines, and all the damage of the construction phase will be hugely expensive and is underestimated.

The huge scale of VEFW is out of proportion. If it and therefore the interconnector should go ahead other windfarms will jump on the bandwagon and cover the islands with turbines totally destroying the way of life here, economically, socially, physically and mentally.

Turbine technology is rapidly developing and despite the recent increase in size of VEFW proposed turbines large offshore wind farms positioned near centres of energy consumption are the future as SSE itself recognises and also has an interest in.

Question 2: What are your views on the demand sensitivity explored by SHE-T?

Energy demand locally from the oil and gas industries is unlikely to increase any time soon given the economic downturn.

Question 3: What are your views on the link options considered by SHE-T? We are also interested in views on the options proposed by SHE-T to mitigate against the risks of a second link being needed.

Without the VEWf there is no need for any interconnector.

Furthermore, there is no need for an interconnector to supply Shetland with electricity when the Lerwick Power Station comes to an end. The Western interconnector link between Scotland and Wales demonstrates unreliability and therefore the need for a local back-up power station.

There is a proposal for one run on LNG, a fossil fuel for sure, but its use would decline with the increase of small-scale wind and, more importantly, tidal energy generation for local use to the degree that Shetland becomes truly carbon neutral and sustainable.

Question 4: What are your views on the technical design and costs of the proposed Shetland link?

Shetland's geographical position in the middle of heavy seas hundreds of miles from where the energy is actually needed makes the proposed link an unnecessary expense.

The Western Link as mentioned in Question 3 above illustrates the unreliability and difficulties which would add to the already high costs.

Fishing and aquaculture interests are also concerned about adverse impacts on their livelihoods

Question 5: What are your views on the CBA put forward by the ESO?

The proposal for the gas fired Power Station hasn't been evaluated but certainly would be considerably cheaper than the interconnector and would be needed in any case given the history of interconnector failures, eg the Western Link, "to keep the lights on" in Shetland.

Constraint costs counterfactuals - seems like Shetland has become a pawn in a bigger SSE "game".

Question 6: What are your views on other approaches we have taken to assess the costs and benefits to GB consumers?

See Question 4 re unreliability and costs of the proposed interconnector. There are no other proposed alternatives in your paper so the costs to UK consumers is not satisfactorily assessed.

Question 7: What are your views on our minded-to position to conditionally approve the revised Final Needs Case? Specifically:

- i) Do you agree with our proposal to approve a 600MW link subject to Ofgem being satisfied, by the end of 2020, that Viking Energy Wind Farm is likely to go ahead?

No, this should not go ahead as already stated

- ii) Do you have any views on the type of evidence we should expect to see that would confirm that Viking Energy Wind Farm is likely to go ahead?

More clarity as to its finances while preparatory works appear to be going ahead regardless eg the Sandwater road widening

- iii) Do you agree with the factors we have considered to reach our minded-to position?

There is not enough certainty around costs and concerns about constraint counterfactuals

- iv) Are there any other factors that you consider we should take into account when assessing this proposal?

I would just like to add that VEWf has changed over the years since it was first approved by the local Council, a controversial decision even then, with the majority of local people opposed. Not only have technical specifications been altered but it is no longer a community based project with SSE so deeply involved.

It is in SSE's interests for the interconnector to proceed but increasingly doubtful whether for those of the UK energy consumers.