

Save Shetland
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30th September 2021

Ofgem

riioelectricitytransmission@ofgem.gov.uk

Contact: James Norman

Head of Electricity Transmission Development

Dear Sir

Shetland HVDC Link – Project Assessment

I wish to respond to the above consultation, on behalf of Save Shetland, a small group which was formed to oppose the industrialisation of Shetland, which is currently taking place under the guise of green energy.

This consultation is too little too late and any meaningful input should have taken place prior to approval being granted for the HVDC link. However, we have reviewed the 40-page document and comment as follows;

Unreliable Technology

There has been a series of failures in other subsea cables and we are aware that insurers are leaving the market or declining to provide cover. The Shetland link will be even more exposed to physical damage and any repairs will be complex and could take months.

Back-Up Energy Supply

Contrary to the date of 2025 stated, the Lerwick Power Station has recently had a replacement 6MW engine installed and will be used as a back-up supply until 2035 with similar staff levels as currently in place. Start-up costs from standby mode are considerable.

Further Additional Costs

In addition to the costs referred to in the document, there are further grid updates and connections planned, which will result in further substantial costs. SSEN have recently held consultations regarding this, and assuming that Ofgem have been kept in the loop, the costs stated in the document are incomplete and the initial cost benefit analysis for the cable is meaningless and totally unrealistic.

We have answered below, the questions in the consultation document;

1. Agree with proposed cost allowance.
2. Agree with treatment of risks.
3. Agree with proposed output and delivery date.
4. Agree with implementation of the re-profiling and LPD mechanisms. ?
5. Agree with proposed modification 1.1.

6. Agree with proposed modification 3.31.

Lastly, Ofgems role “is to protect consumers by working to deliver a greener, fairer energy system” and we would argue that Ofgem has failed in its responsibilities. Consumers are not being protected when there are substantial increases in energy charges with fuel poverty at record levels. Also, it is glaringly obvious that the industrialisation currently taking place in Shetland is more akin to environmental vandalism than green.

Yours faithfully

Ernie Ramaker

On behalf of Save Shetland