

Skye Reinforcement Consultation Response – 21st January 2022

Community Power Outer Hebrides (CPOH)

Community Power Outer Hebrides (CPOH) is a collective of community generators situated throughout the Western Isles (WI) and facilitated by Community Energy Scotland. This submission represents the view of:

Urras Oighreachd Ghabhsainn

Point and Sandwick Development Trust

Tolsta Community Development

Horshader Community Development

Storas Uibhist

Barra and Vatersay Community Limited

Community Energy Scotland

Question 1: Do you agree with the technical need for investment on the transmission network?

CPOH agree that there is a technical need for investment on the transmission network and fully support additional investment being spent to add capacity to the Skye circuit.

We would however urge OFGEM and the Government to review their current policy of only building the network to suit the current demand as this is not value for money in the longer term, it does not support the decarbonisation/electrification of heat and transport and it fails to future proof our electricity networks. There needs to be more factors taken into account such as the available renewable resource in that area, the strength and experience of community organisations to deliver projects, how supportive planning departments are and the ability of areas to support and meet net zero objectives. Communities in particular face an extremely challenging environment when developing energy projects and therefore the need for additional capacity, and support, to be in place to allow them to connect in the future is essential.

Question 2: Do you agree with our initial conclusions on the three drivers for the Skye project?

Yes. We would emphasise that the security of supply and also the ability of our generators to export generation is dependent on the Skye – Fort Augustus link and therefore we feel it is important that WI generators are taken into account fully as part of this consultation exercise.

We did note that there are no plans to remove any of the diesel generator sets from the distribution network and we would argue that there needs to be an immediate shift towards adapting plans so as to fully consider how low carbon options could be playing a bigger part now in working alongside, and with the aim of phasing out, these generators in the future.

Question 3: Do you agree with our initial conclusions on the technical options considered?

No. The reason for this is that we feel not all the options have been explored fully and utilising all the relevant information. CPOH had asked SSEN for a review of additional options to improve the

resilience of the Western Isles network in the summer of 2021. This was met with a promise that a 'Plan B' Study would be completed and used as part of the analysis of the various options for the Skye upgrade. This was not completed on time and has not been factored into the options, therefore leaving significant questions around the resilience of the WI network for generation unanswered. We are also concerned as to whether the new cable from Uist/Barra to Skye which has now been committed to as part of SSEN's ED2 plans have been factored in to the planning stages for this new link through Skye, as the new infrastructure to Uist would have been decided upon after the options appraisals for the Skye reinforcement was likely to have been carried out. This link is essential to the resilience of the WI grid for those who live there and also for our Uist and Barra generators – it is therefore essential that this link is included in all further planning regarding the Skye upgrade works.

The agreed Plan B study was commissioned to explore a second 33kV link being built from Harris to Skye which would have a direct implication on the various options being looked at as part of this Needs Case. We are at a loss as to why this was not done, or if it has then why we haven't been informed about the study's completion. This additional link would improve the overall resilience of the connection to Lewis and Harris as well as provide opportunities for additional generation from one of the most renewable rich locations in the country.

We also urge SSEN and OFGEM as part of this review to ensure that the existing embedded generation on the Western Isles remains connected to the new 33kV link which has just been built to Skye, regardless of the proposals for a larger interconnector from Lewis to the mainland. We have been promised that the existing generation would be able to be sent via the Skye link in the instance where the interconnector, if built, was suffering from an outage. To have the embedded generation redirected from the Skye link where they are connected currently, to the interconnector and then back to the Skye link during outages seems to us unnecessary and would leave around 30MW of renewable generation in Skye with a non-firm connection or at worse it would lead to a stranded asset for that amount of generation.

Question 4: Do you agree with our initial conclusions on the cost benefit analysis and the appropriateness of the option taken forward?

As above we not feel that all the options have been considered due to the lack of evidence provided by SSEN regarding further upgrades to the WI links to Skye.

We continue to urge Government, OFGEM and DNOS to look at having a more joined up and holistic review of the grid networks which properly links renewable resource with options for local use and export, particularly focused on the benefits these projects can bring to our communities be it economically or environmentally, rather than the whole system being weighted purely on the option of 'least worst regret' for the consumer.

Question 5: Are there any additional factors that we should consider as part of our Initial Needs Case assessment?

Community Power Outer Hebrides remain committed to the review and progression of a much more resilient system for the Western Isles as a whole, looking not only at electricity but also the decarbonisation of heat and transport through bespoke local whole system solutions. We would urge SSEN and OFGEM to review legislation and process in order to further encourage DNOs to explore and support opportunities for smarter whole system grid networks, battery and other storage options, and the need to support community generation to be connected - rather than the current situation in the WI where developments are hampered for coming on 20years due to the focus on one solution, a

solution which is currently not progressing due to the nature of how the grid system is regulated coupled with increased costs/complications.