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Tuesday, 8 February 2022

Dear Sirs

Call for Evidence—RIIO-ED2—SPEN

In the context of the published DNO business plans for RIIO-2, I wish to respond as the representative of a community organisation that has benefitted from the community funds that our local DNO (SP Energy Networks) has provided.

General comments and context

Without SPEN's Green Economy Fund, this co-operative would not have been able to establish. Teviot Electric Car Club offers self-service hire of electric vehicles in Hawick, Scottish Borders. We currently have about 45 members, many of whom have relinquished their private cars and rely on the club for their car transport needs. We also have members who joined the club with the intention of evaluating whether an electric vehicle would suit their own personal and business needs; they have now gone on to buy their own EV. There is much more potential to not only electrify the local private car fleet but reduce the number of vehicles involved by sharing cars—either through the car club or on a peer-to-peer basis.

We therefore applaud SPEN's Green Economy Fund and their desire to continue this good work through similar funding initiatives. We are conscious that GEF was funded through the transmission arm of the business rather than the distribution department and we recognise that ventures like ours divert energy use from fossil fuels onto the electricity network. Given that Scotland is often generating more electricity than is consumed north of the border, therefore exporting it to England and beyond, any increase in the Scottish electricity consumption helps to reduce the flow on the transmission connection to England, which we know is sometimes constrained. By using smart chargers for our vehicles and investigating V2G possibilities, we are positioned to play our part in providing a dispatchable energy resource that the future DSO can communicate with.

Call for Evidence

1

a. clearly state which section of the Business Plan or Plans the stakeholder is commenting on;

Chapter 4 / Part B—Work with our communities to facilitate the energy system transition

b. include a concise summary of the issue identified;

This whole section is very good and accurately describes the issues that communities face as well as proposing workable solutions.

The Distribution Net Zero Fund is a particularly important development.

c. include evidence or justification of the stakeholder's view;

As someone who has worked in community energy for over a decade and worked closely with the Scottish DNOs on various projects, it is encouraging to see a recognition of the importance of community energy, the challenges that community groups face and practical solutions to support groups in reducing their carbon footprint.

Important aspects of the GEF that deserve to be continued in the new, proposed DNZF include the ability of community groups to employ local people including paying a project manager to push forward the project. Many community projects languish or founder due to limitations on time and volunteers' other commitments; paying a project manager ensures that a responsible person can dedicate the time necessary to wade through the difficulties that appear along the way.

Another important aspect is the ability to flex as complications arise. All projects meet with unexpected surprises and even the most researched proposals can get blindsided by details that could not be known beforehand or third parties being unable to fulfil their earlier commitments. A rigid approach to goals and outcomes can cause such a project to unnecessarily fail. GEF demonstrated how a flexible approach can enable the project to adjust to the situation that it finds itself in and move forward, perhaps with adjusted goals or budgets. While goals or targets can be helpful to guide things, they can become counter-productive if they are focussed on to the exclusion of the larger picture.

2

a. clearly state which section of the Business Plan or Plans the stakeholder is commenting on;

Commitment 7—Be a neutral facilitator of an open and accessible distribution flexibility services market.

b. include a concise summary of the issue identified;

Excellent and very important

c. include evidence or justification of the stakeholder's view;

As SPEN becomes a DSO, the need for local a distribution flexibility services market will be crucial. This is an area that is not yet well developed. There are various assets in the area that could usefully be deployed, as dispatchable loads or generation but the flexibility market needs to be established so that people and organisations can participate for mutual advantage. I recognise that this is no easy task and integrating this with other flexibility markets—including half-hourly pricing—will be challenging but it needs to happen and it needs to be as simple as possible for individuals and organisations to participate. Only then can the client base develop to the scale necessary.

3

a. clearly state which section of the Business Plan or Plans the stakeholder is commenting on;

Commitment 13—Provide a team of specialists that will partner with Local Authorities and regional Governments to support Local Heat and Energy Efficiency Strategies (LHEES) and Local Area Energy Plans (LAEPS)

b. include a concise summary of the issue identified;

Why not include community groups?

c. include evidence or justification of the stakeholder's view;

There are various community groups that are active in developing and supporting energy efficiency and local heat initiatives. Many of these have a better understanding of the issues that people face than those within the Local Authorities or governments. It would therefore be important to work with such groups rather than exclusively with the official bodies.

I hope that these insights are helpful in the development and acceptance of these plans.

Many thanks



Andy Maybury
Chair