

Consultation on SHET's Gremista Grid Supply Point Project

I wish to respond to this consultation as a consumer with legitimate concerns regarding the escalating costs associated with electricity generation projects and associated infrastructure connections on the Shetland Islands.

I have already responded to other consultations over the past few years and this seems to be one more in what appears to be an endless succession of proposals brought to Ofgem in a piecemeal fashion by subsidiaries of Scottish and Southern Energy.

My responses to the questions in the consultation are as follows:

Question 1. *Do you agree with our view on the validity of the needs case for the Gremista GSP MSIP Project?*

Lerwick Power Station was upgraded by the installation of a new generator fairly recently and its operational lifespan was extended to 2035, at least ten years more than originally forecast by Scottish Hydro Electricity Transmission (SHET). Considering the fact that the Gremista GSP is for connecting the Scottish and Southern Energy Viking Energy Windfarm (with associated HVDC subsea cable to the Scottish mainland) to the Shetland transmission system, it can not be described as a means of providing "continued security of supply to Shetland" as stated in paragraph 3.9.

Electricity generation from renewables is variable and at times intermittent, requiring a backup solution at all times. Subsea cables have proved to be unreliable and prone to failure, as evidenced by the multiple failures of the Western Link, which by the way, were still being investigated by Ofgem when approval was given to the cable link to Shetland. Added on to that is the recent catastrophic failure of the link between the Isle of Skye and the Western Isles which had to be completely replaced. A cable between the Scottish mainland and the Orkney Islands also failed and, as far as I know, has not been replaced. As a result, there is no reason whatsoever to assume that an even longer cable link to Shetland will contribute to providing the Islands with a secure electricity supply.

The Gremista GSP, therefore, is only part of a proposal put forward by SHET and no doubt another will soon follow regarding a backup solution for when failures occur which will simply add on increasing costs for consumers.

Question 2. *Do you agree with our technical assessment of the range of solutions to meet the needs case?*

It is interesting to note that a full Cost Benefit Analysis was not done by SHET on their chosen option of linking up SSE Viking Energy Windfarm to the Grid Supply Point at Gremista. If the cost is to be passed on to consumers then surely that should be a known quantity. Also, the reason given for running two 132kV circuits parallel with each other as a requirement in case one circuit fails (point three in paragraph

4.10) does not make much sense to those of us who live here and are accustomed to the vagaries of the winter weather. There is no reason at all to assume that if damage is caused

to one circuit, especially overhead lines, that the other circuit will somehow escape unscathed.

Question 3. *Do you agree with our minded-to view on the solution proposed by SHET?*

I do not agree with your minded-to view on the solution proposed by SHET as it is geared towards providing a link between SSE Viking Energy Windfarm and the Scottish mainland and not about providing a secure supply of electricity to customers in Shetland. Other solutions to replacing the diesel power station with a locally produced lower carbon electricity supply were put forward by other agencies in a previous consultation but were rejected by Ofgem.

I am curious as to how SHET are going to conduct market testing before submitting another Medium Sized Investment Project request for funding in 2023. It is a fact that electricity produced a long distance away from where it is needed is far more expensive than that which is produced near to a main consumer base. No wonder SHET put forward a case for dividing their application for MSIP funding into two stages. It will give them more time to forge ahead with “preparatory works” while Ofgem will find it increasingly difficult to ensure that “consumers fund projects only when there is clear evidence of benefit” and there is “clarity on likely costs”.

In the meantime, a subsea cable-laying vessel has been seen undertaking a survey of the seabed in an area for another proposed cable link between the island of Yell and the Shetland Mainland. This will no doubt lead to another SHET application for additional connections to the Shetland transmission network with all the associated costs involved with the required infrastructure.

Yours sincerely

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