

Ofgem

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Dear Sir

SHET's proposed Gremista Grid Supply Point Project

I wish to respond to the above consultation on behalf of Save Shetland, a small group formed to oppose the industrialisation of Shetland, which is taking place as a result of very large scale "renewable" energy projects.

Firstly, it is questionable that this project should be considered under a Medium Sized Investment Project (MSIP), given that para 2.1, states "It is therefore possible that total costs may exceed the £100m upper materiality threshold for MSIP submissions."

We disagree with Ofgem's reasoning in para 2.2 which states "... it would be inappropriate to delay the project by initiating a separate process to reconsider the project under Large Onshore Transmission Investment (LOTI) re-opener given the need to provide security of supply by 2025....". This is in the knowledge that the Lerwick Power Station will be used as a back-up supply until at least 2035.

Ofgem provide little confidence or assurance that the materiality threshold will be implemented, when it states in para 2.3, "Should the costs exceed the accuracy range specified in the MSIP submission, we view that the Gremista GSP may need to be reconsidered under the LOTI re-opener.

Ofgem should also be aware of the further proposed grid connections to Yell, which will require future add on approval.

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

We do not agree that this project will ensure security of supply for Shetland, as we are aware that there have been a series of failures in other subsea cables. The Shetland link will be exposed to the severest weather conditions and any repairs will be complex and could take months, risking power outages and further increasing costs to the consumer.

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

We are of the opinion that any further negative visual impacts should be minimised and that all the proposed cabling should go underground, and do not agree with SHET that the least cost option is suitable for the section of the route south following A970. The height and design of the Trident poles, which consist of double poles which are approx. one third higher than the existing single ones, are totally unsuitable for a small island which has already been blighted by this project.

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

We do not agree with Ofgem's minded-to view of the option proposed by SHET.

There is little confidence that Ofgem treats communities with fairness and transparency, or listens to their concerns. Their agenda appears to be to approve the installation of largescale renewables, regardless of the costs to the communities concerned or to consumers who ultimately pay for these developments through higher bills. Although we totally disagree with the suitability of SHET's plans, it may have been more palatable if SHET had been up front and honest about the complete implications of their plans for Shetland, rather than the piecemeal approach taken to avoid full scrutiny of the complete development.

Yours faithfully

Save Shetland

Ernie Ramaker