



www.sustainableshetland.org

info@sustainableshetland.org

Chair: Frank Hay
Hellister, Weisdale.

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F.A.O. Jack Schuler,
Ofgem.

Consultation – SHET Gremista Grid Supply Point Project

I wish to respond to this consultation on behalf of Sustainable Shetland, a campaign group concerned about very large scale renewable energy projects proposed for Shetland. We have been an interested party in the various consultations leading up to Ofgem's approval of the Shetland Subsea Link.

We are well aware that this is a consultation in name only, as approval is already assumed by SHET, and indeed investigative work has commenced on the route of the proposed cabling and overhead lines. It is clear that this is an essential part of the already approved subsea link to Shetland which could not fulfil the reasons for approval without this GSP. In fact, this should have been included as part of the subsea cable proposal and its cost included in the Cost Benefit Analysis of that.

We have concerns about the following statements that are included in the consultation documentation.

1.3 Shetland is not currently connected to the mainland transmission system. It is instead served by an isolated distribution network with two main generation sources, a diesel-generated power station at Lerwick and a small wind generation station. With the Lerwick Power Station (LPS) nearing the end of its operational life, security of supply for Shetland must be ensured via alternative means.

It is now clear that LPS is far from the end of its operational life. At least one new engine has recently been installed and it scheduled to remain as a backup for Shetland's power supply until at least 2035. So much for security of supply being ensured by the transmission link and Viking Energy Windfarm.

1.4 *Scottish Hydro Electric Power Distribution (SHEPD), the Distribution Network Operator (DNO) that run the low voltage system on Shetland, submitted analysis which they believed demonstrated that the most economic and efficient solution to deliver enduring security of supply was by utilising the Shetland HVDC Link. SHET aim to facilitate this connection by establishing a GSP in Gremista.*

We fail to see that this is the most economic way to ensure security of supply on Shetland. The main reason behind this whole charade is an attempt to facilitate renewable energy projects, notably SSE's Viking Energy, irrespective of the costs involved. SSE clearly have an interest in upgrading the network so that their project can market the energy it hopes to produce.

Question 1: Do you agree with our view on the needs case for the Gremista GSP project?

The needs case seems to be based on flawed evidence from SSE. Their plans do not ensure security of supply for Shetland when subsea cables have a questionable track record. Any failures in subsea cables take a long time to repair, especially in winter. It is worth pointing out that the link to Shetland requires two long subsea cables to be utilised.

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

Whilst technically correct we feel that the Shetland grid upgrade works should all be underground. With 103 oversized turbines dominating the landscape of Central Shetland the least SSE should do is minimise other impacts. Given that the total cost of the windfarm, subsea cable and other requirements will be over £1.3 billion the extra cost of undergrounding would be a very small percentage of that. There are also concerns about the GSP at Gremista being very near to peoples' homes and businesses.

Question 3: Do you agree with our minded-to view of the option proposed by SHET?

No, but no doubt it will be approved regardless.

Further grid upgrades are clearly in the pipeline, the add on approach works well for SSE as projects which would have been unlikely to have been approved in their entirety sneak through by this approach. In particular, ground investigations are also underway for grid connections to Yell. We look forward to seeing your consultation on that.

Frank Hay,
Chairman,
Sustainable Shetland.