Good afternoon

Thank you for publishing your draft determinations on DNO business plans for RIIO-ED2. I am writing with comments on your determinations from the perspective of a county council which is actively engaged with both of the DNOs that serve our county.

West Sussex County Council have set a target of achieving net zero emissions by 2030 and our [energy strategy](https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.westsussex.gov.uk%2Fabout-the-council%2Fpolicies-and-reports%2Fenvironment-planning-and-waste-policy-and-reports%2Fenergy-strategy%2F&data=05%7C01%7CRIIOED2%40ofgem.gov.uk%7Cfe6a8eca1b414535dda108da8697421c%7C185562ad39bc48408e40be6216340c52%7C0%7C0%7C637970281454083290%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=Gnam%2Bfliwy8j8SVUhhAz4r6xx5uExy0TxzXHDa6e1ME%3D&reserved=0) describes the bold approaches that will be needed to ensure a reliable and cost efficient supply of low carbon energy. Our strategy is modelled on the ‘Leading the Way’ future energy scenario and we recognise that rapid transformation is needed within both the electricity systems and consumer behaviour. In the midst of a complex and volatile context, we have identified collaboration as a key enabler of achieving the strategy, and have been building closer relationships with both UKPN and SSEN. In the coming year we expect to benefit from their planned investments in resources to support Local Area Energy Planning, and work with them to connect new generation and flexibility assets, charge points, and heat pumps.

We were surprised to hear that SSEN proposals for investment in net zero technologies have been scaled back by Ofgem. Their analysis is that this would result in reduced engagement with local authorities and delayed investment. The outcome of which would be fewer grid connections for renewable energy, flexibility and low carbon heating technologies. While we want a lower cost of energy for our residents, we don’t believe that a rapid transition is possible without significant investment. Most seriously, we understand that investment to support local authorities in developing Local Area Energy Plans would be threatened by these cuts. We believe that this would delay a comprehensive and cohesive transition plan, with the risk that vulnerable people are left behind, resulting in a fragmented energy system that does not deliver reliable or low cost energy.

We support the Association for Decentralised Energy’s (ADE) analysis for the DNO’s business plans which are broadly positive, while also identifying opportunities for stronger commitments to flexibility and active network management.

Should you need any further detail to support these comments, please do get in touch.

Yours,

Phil Morris