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**If you have difficulty reading this document please contact Ewan Wallace on 01467 536152**

Dear Sir/Madam

**RIIO-ED2 Draft Determinations Consultation**

I refer to your to the above which closed on 26 August 2022.

Please accept my apologies for the late submission, which will hopefully still be considered.

As you may be aware the Aberdeenshire Council are in the North East of Scotland is home to over 260,000 people and has extensive successful business sector comprising energy, farming, fishing and tourism.

As a Council we are making significant efforts to decarbonise our activities along with supporting our communities in making that transformation. We have also had significant challenges arising from recent storms that have highlighted the need for greater resilience in our energy and communication networks.

I would therefore make the following points regarding your proposals

- Aberdeenshire Council has a target of 75% by 2030 and Net Zero by 2045 from the 2010/11 baseline year. Extensive and resilient electricity networks will be vital in ensuring that we achieve these targets.
- We would encourage Ofgem to think again about the investment required in the North of Scotland's electricity network. The unique characteristics and requirements of the North of Scotland require a bespoke approach. Scotland has set a legally binding 2045 net zero target, five years ahead of the rest of the UK. We can only achieve this by accelerating electrification and greater investment is required in both network capacity and reliability to facilitate decarbonisation and support an ever-increasing reliance on the electricity network.



- We would also call on Ofgem to rethink its decision to revert to the conservative Future Energy Scenario for System Transformation. Aberdeenshire boasts strong energy credentials and there is significant demand in place from our residents to make the most of net zero technologies. We now need to see the investment in electricity networks to support this demand and avoid falling short of the trajectory needed to reach net zero.
- Finally, we would urge Ofgem to bring forward the proposed funding for resilience. Our communities endured three significant storms last winter and we welcome a discussion on resilience standards to minimise the impact of extreme weather on our communities wherever possible. We note that Draft Determinations include a re-opener for DNOs to apply to adjust their baseline allowances where they identify a change to the scope of work they expect to deliver, as a result of the E3C's or Ofgem's recommendations from the Storm Arwen review. We are concerned by Ofgem's decision not to allow this adjustment to be available until 2024 which will result in consumers having to wait for two winters before obtaining the benefits from additional works which could have been undertaken by DNOs.
- In summary, significant investment is required in electricity networks now to support the transition to net zero. Your proposals fall short of what is required and urge Ofgem to think again and work closely with all stakeholders to support our ambitions to achieve Net Zero.

Yours faithfully

**Ewan Wallace**  
**Head of Environment & Sustainability**