



HOUSE OF COMMONS

LONDON SW1A 0AA

Jonathan Brearley  
Chief Executive  
Ofgem  
9 Millbank  
London  
SW1P 3GE

Our Ref: AM8270  
24 August 2022

Dear Jonathan,

I am writing to you regarding OFGEM's consultation on RIIO-ED2. In October 2021 I welcomed SSE's business plan for 2023-2028 which they submitted to OFGEM and I, as well as other stakeholders, are supportive of their plans. Particularly their proactive approach to managing their subsea infrastructure. However, following the Draft Determinations by OFGEM it would appear that OFGEM have not taken into account the unique nature of the north of Scotland and in particular the unique nature of Scottish islands.

I am particularly concerned that OFGEM have reservations over the proposed replacement of the existing Skye to Uist subsea cable, as this cable is a lifeline electricity supply for communities in Uist, Benbecula, Barra, Berneray, Eriskay and Vatersay and requires proactive intervention. I am disappointed by the decision to reduce the subsea cable baseline allowances overall for Scottish islands by around 26%. SSEN proposed replacing the existing cable in the baseline because it is in a similar condition to the old Skye-Harris cable and would look at a second cable via the Hebrides and Orkney re-opener. As it stands, the existing cable now also has to go forward via the re-opener, which is suboptimal for consumers and if this decision is in the Final Determination then investment by SSEN would be delayed. I have welcomed SSEN's approach to managing similar risks going forward.

Furthermore, it was disappointing that OFGEM rejected the costs to replace diesel generators at Battery Point in Stornoway, particularly as this funding would have reduced emissions and improved efficiency. In supporting the transition to net zero it is important that significant investment is made now in electricity distribution networks which would support the transition.

I hope that OFGEM will recognise these points, and reconsider your stance, when making your final determination later this year.

Yours sincerely

**Angus B MacNeil MP**  
**Member of Parliament for Na h-Eileanan An Iar (SNP)**  
**31 Bayhead Street, Stornoway, Isle of Lewis HS1 2DU**  
**Tel: 01851 70 2272**  
**[angus.macneil.mp@parliament.uk](mailto:angus.macneil.mp@parliament.uk)**  
**[www.angusmacneilsnp.com](http://www.angusmacneilsnp.com)**

Angus B MacNeil MP  
Na h-Eileanan an Iar