

## **Call for input: Future of local energy institutions and governance**

**Submission by the Energy Capital team at the West Midlands Combined Authority, on behalf of the Regional Energy Systems Operator innovation project.**

### ***Introduction***

*Local energy governance has been the focus of an Innovate UK funded project called the Regional Energy Systems Operator project – RESO – for the past two years. The team behind this project, led by Energy Capital at the West Midlands Combined Authority, feel that the recent OfGEM call for information is the ideal opportunity to share our learning from this project to support OfGEM on its journey towards the inclusion of a local system planner and operator within the energy system.*

*As part of our response to this call for input, we ran a workshop for OfGEM on the 26<sup>th</sup> May 2022. The slides from this session are attached and the detailed outcomes of the RESO project are also available for further reference [here](#). The team would welcome further and ongoing engagement with the OfGEM team on this topic, to support the exploration and deeper understanding of the issues raised through this call for input.*

### ***A Regional Energy Systems Operator (RESO)***

*The critical question resulting from the RESO project was not, “what is the optimal technical pathway to net zero?”, but instead, “what is the regulatory and governance structure which is most likely to support and enable delivery of net zero at lowest cost, given a credible range of technical pathways?”.*

*The approach that the RESO project took to governance was to develop an organisation design, able to support a city wide smart local energy system, informed by relevant evidence. It was designed from an informed-place perspective with a detailed evidence base; through a lens that was not limited by existing organisational structures, and with the purpose to stimulate an informed conversation and contribution to the national debate.*

*The RESO project identified that delegating certain aspects of system management and governance to lower levels in the control hierarchy, enables the realisation of whole system benefits, which the national system cannot otherwise expose through current market mechanisms. From this, the project went on to determine the least-regrets options for a regional energy system operator, with established methodologies for this process to be replicated elsewhere.*

*The RESO project was carried out with specific decarbonisation and net zero goals in mind and understood that we need to transform the ways in which we heat our homes and power our vehicles to meet these ambitions in a cost-effective way. To achieve this there will need to be fundamental changes across the energy system to accommodate increased electricity demand, and strategic investment in electricity network infrastructure will be needed – especially at the distribution level.*

*The outputs of the RESO project showed that flexibility could drastically reduce the amount of network infrastructure required. Ofgem have identified that flexibility would potentially save consumers (nationally) between £6-10 billion per year by 2050. This will require strategic planning and effective coordination across the energy system by integrating distributed sources of generation, storage and flexibility to help drive efficient network investment decisions and reduce costs for consumers. Underpinning the success of this will be significant advancements in data and digitalisation. The RESO model has demonstrated that it would add value to the national model by improving information flows,*

*incentivising behaviours and removing uncertainty of roles. A key finding however was that technical pathways would remain conceptual until regulations, business models and incentives were put in place to enable the pathways to be realised on the ground.*

*We believe that these regulatory changes are possible within the new FSO structure proposed by BEIS and OfGEM. The key to this, as set out in the Smart Systems and Flexibility Plan, is to ensure that institutional and governance arrangements at a sub-national level are fit for purpose to meet the energy system needs in the long term, whilst bringing local benefits of participation and net zero growth.*

*Over the course of the RESO project, a global review of municipal energy governance models was conducted, concluding that the closest and most relevant model would be an adaptation of the New York Public Benefit Corporation model, which was used to estimate initial functional resource levels and costs for a RESO. It was determined that if replicated nationally, the revenue costs will be between £400-700M, which is commensurate with the existing costs of the national electricity system operator (ESO) (£2.1 billion) and thus the likely costs of the proposed future system operator (FSO).*

*Based on the findings of the RESO research and practicalities relating to incremental change of the energy system, an optimal governance structure for nationally replicated RESOs could be as regional arms of the national FSO (i.e. with the £400-700M coming out of the total £2.1 billion, and thus creating no additional costs for customers).*

*Critical to the success of such a model would be ensuring that the governance structures reflected the RESOs combined responsibility; to OfGEM on the impact of operations on the national energy system and the wider consumer base, and achieving local democratic accountability for delivery of energy services to the local community and delivery of infrastructure to support local decarbonisation and green growth objectives. To do this the governance structure of the regional FSO branch for example, would need to link into existing governance structures within Local and Combined Authorities, where the transport and spatial planning functions reside, to ensure democratic accountability, reduce operating costs and increase efficiency.*

*The RESO project went some way into identifying which aspects of the system planning and operation were best done through which governance structures based on existing regulations for the wide range of aspects impacting on the whole energy system, including transport, waste and buildings, as well as electricity, gas and district heating.*

### **An iterative approach to establishing the relevant structures**

*The least-regrets pathway for implementation was identified as prioritising data governance and whole-system planning functions, supported by rapid implementation of neighbourhood-level citizen engagement and consumer protection functions.*

*It was identified that alignment of administrative and physical boundaries for infrastructure networks, local authorities and RESOs would be beneficial to reduce the data and engagement costs. However, it is accepted that this would be huge challenge which would require major restructuring for minimal savings and therefore would not be necessary.*

*RESO demonstrated just how complex these structures are in the UK, and led us to the conclusion that although the 'Interacting Organisations' model looks attractive (as the base model would not require primary legislation), co-ordinating institutions alone would only take us so far towards harnessing the identified value. Our belief is that it would be impossible to reconcile legitimate boundary issues and divergence of interests fully within existing structures.*

*However, the creation of a Regional Systems Planner and Operator / RESO under revised regulations, could emerge from the initial step of enhanced collaboration in trial areas, which would enable OfGEM to map out the most appropriate future form of these roles and responsibilities going forward.*

*There is a compelling argument around focusing on greater energy system data and digitalisation and we applaud the efforts across the innovation space and being promoted through regulation as the first step in this process. It is a foundational element of future energy systems. Many system changes can be more effective, can be accelerated or lead to wider system benefits with appropriate data. However, there are significant challenges that will need to be addressed. Governance of data, the ability to access appropriate data, the curation of data and pooling of highly disparate data from different sectors (e.g. water, telecoms, planning, energy systems) have a set of complex challenges that will take time to find agreed approaches across different stakeholders. We believe data and digitalisation is important, but on its own will not address the challenges, or deliver the desired benefits.*

### **The cost of inaction**

*The cost of not addressing the governance aspects of the energy system locally was shown to be significant. The value that would be lost would be up to £721M over 30 years:*

- *Failing to provide clarity regarding governance and responsibilities, and integration of whole systems planning, including heat and transport, will result in continued inefficiency of energy system planning, wasted resources and higher costs.*
- *The energy system will continue to be blamed for the failure by local areas to decarbonise effectively, due to the absence of appropriate infrastructure to enable the transition.*
- *The failure to make the energy system smarter, will perpetuate and exacerbate inequalities and mean that investment into decarbonisation technologies such as electric vehicles, heat pumps, solar and energy efficiency measures, remain the privilege of the few. Creating a smarter local energy market, off the back of effective local energy planning, will mean there is the potential to spread the benefits much more equitably across society.*
- *Failing to prioritise the needs of place as the foundation of an effective energy system will result in the failure to secure significant co-benefits in the economy, transport, health and welfare.*

### **Specific question responses:**

- 1. Are the three-energy system functions we outline the ones we should be focusing on to address the energy system changes we outline?**

*The three functions outlined are an appropriate focus, however, there needs to be some deeper thought applied to the interaction of these functions, and the sequencing in which they need to be established.*

*Energy system planning needs to be aligned at several different scales related to different functions of the system operator and hard wired in from the start. For example - system balancing/constraint management by despatch of varying scales of distributed flexible assets - if only carried out nationally, the significant differences between place will be over-looked and inefficiencies will be introduced from the start.*

*Market facilitation of flexible resources also needs to consider local generation and supply that could be connected, to support the flexible operation of the network. The RESO project has demonstrated the value of non-firm connection capacity to operate the network flexibly and efficiently. For this the*

*real time operation of local energy networks needs robust systems and markets driven by appropriate data at the local scale.*

**2. Do you agree with the criteria we have set out for assessing the effectiveness of institutional and governance arrangements?**

Yes.

**3. Do you agree with our assessment of how far the current institutional arrangements are, or are not, well suited to deliver the three key energy system functions?**

*We agree with the assessment made.*

*Most of the unsuitability of the current arrangement is derived from inappropriate energy system planning processes, where not enough emphasis is placed on the specific needs of an area and how supply, distribution and demand come together. Where previously there has been a largely homogenised electricity and gas network across the country, with equal access regardless of location, the national energy system planning was adequate. However, the nature of achieving decarbonisation goals needs to take a holistic, place-specific approach, with tailored solutions to meet the needs and account for the existing assets of an area, however the current institutional arrangements do not support and enable this.*

*The Regional Energy System Operator project combined a number of local energy planning processes, including using Distributed Future Energy Scenarios. We tested a technology agnostic approach to energy system planning, providing a series of options and opportunities based on the areas needs and assets. This bottom-up process highlighted many flaws in the existing system and issues around assumed future roles and responsibilities. We feel the local government governance, as well as the energy system governance, needs to consider energy and decarbonisation and that the Government's Levelling Up agenda and Devolution Deal negotiations provide a route to test and achieve steps towards this. For this reason, Energy Capital at the WMCA are working closely with BEIS and DLUC through the Devolution Deal process, to seek clarification of roles and responsibilities within the current energy system (see annex 1).*

*Local area energy planning cannot be carried out at a national level, but we identified value in plans being aggregated to a regional/sub-regional level, where the responsibility to carry out this function needs to sit. Currently local government are not empowered, required, or incentivised, to engage with the energy system, so the assumption by DNOs that local authorities will deliver local area energy plans is currently flawed. The 'Interacting Organisations' model, if delivered in partnership with BEIS through the levelling up and devolution deal process, could require Combined and Local Authorities to take a more active role, but the way in which the network operators participate in this process and work with places also needs revision and clarification. A part of this would be to consider where the money comes from to deliver LAEPs and the upskilling of local teams to manage the ongoing process to refresh LAEPs in light of wider system changes and local priorities.*

*The conclusions of the RESO project demonstrated the significant economic value brought to places by taking a local governance approach, which the national system is not able to capture. It is this reason that although many local authorities do not currently engage proactively with energy system planning, if they were given the responsibilities and appropriate routes to harness value, this would be addressed, as it does help them to deliver on their local economic mandate. The importance of market facilitation and flexible resources, as well as the real time operation of local energy networks will also vary based on local factors. For a net importer of energy, such as the West Midlands, these elements will be significant parts of our future local energy system, providing a pivotal mechanism for local grid*

*balancing and security of supply. For an area identified as a net exporter of energy, the significance of these elements may not feel so important, but this is why the West Midlands is focusing so much attention on this issue now.*

**4. Overall, what do you consider the biggest blocker to the realisation of effective energy system planning and operation at sub-national level?**

*The biggest blocker to effective energy system planning will be ‘investment uncertainty’ in relation to aligning infrastructure investment decisions across transport, buildings, electricity networks, heat networks and hydrogen infrastructure to enable decarbonisation. Significant changes to governance need to be made, but these and issues of data and market regulation can be addressed by OfGEM if they are minded to. However, data and digitalisation alone will not be sufficient. Incentives and appropriate derogations are needed to enable local actors to increase the utilisation of networks on a dynamic basis and scale these markets.*

**5. Do you agree with the opportunities of change we outline and the potential benefits they may create?**

Yes.

**6. Are there additional opportunities for change and benefits that we have not set out?**

*A national approach results in lost opportunities to realise value; slower response to external changes; and less capability to support whole system solutions. However, these losses are acceptable because the cost of the national regulator acquiring and managing data to the level of detail required is believed to be higher than the value lost. To the contrary a local approach requires institutions and skills to be established and supported at these lower levels, but enables the realisation of benefits from local whole system solutions which a national system cannot otherwise even see. Places value the strong local economic multipliers, wider energy system participation (equity) and local economic growth that results.*

*The nine CBA value pools used in the RESO project CBA included six indirect sources of value: Carbon; NHS Cost savings; Social Service cost savings; Waste cost savings; local environment; local economy; and three direct value sources: transport savings; energy unit cost savings; energy consumption. All are quantified in the WP6 CBA report here.*



RESO WP6 CBA  
Report Final Dec 20;

*In addition, several more value sources were qualitatively considered suitable for evaluation of benefits, when governance and data permitted. These included:*

- *improved network planning in harmony with local economic growth plans;*
- *improved and locally harmonised engineering approaches to upgrading legacy 6.6kV networks still extensively present in the modelled city of Coventry;*
- *the wider use of local energy market trading of flexibility and further new market models to assist distribution network operation and maintenance;*
- *The markets design counted only value directly from this constraint avoidance. The value of other DNO cost avoidance (voltage constraints, phase balancing, reactive*



*power management, improved options for fault level management and First Circuit Outage compliance with EREP130) whilst not yet considered ready for counting CBA value, are all valid potential sources of benefits arising with a RESO.*

- *Co-value pools; once a RESO is established it will be possible to plan and evaluate further benefits to the ESO and energy system at a national level, by planning and ultimately harmonising local and network plans with infrastructure plans and market plans: acting together to deliver massively scaled-up flexibility, meeting whole system needs and unlock widespread responses to nodal/locational price signals.*

**7. We set out a number of risks associated with change. Do you agree with these risks and the potential costs they create? Are there additional risks of change and costs that have not been set out?**

*Some of today's very tightly measured costs and efficiencies would measure worse, however, these measures appropriateness need to be assessed in relation to the achievement of net zero and new measures should be introduced to properly reflect the missing whole systems benefits.*

*We believe it is premature to conclude that increased engagement complexity for stakeholders may result in decreased customer satisfaction, until the true scale of flexibility markets and business models are proven and new services models for new stakeholders are tested.*

**8. For each model, we have set out the key assumptions which need to be true for the model to offer the right solution. Which of these assumptions do you agree with? (Table 1, page 33)**

- *We query how well the DSO and DNO role can exist within one organisation with conflicts of interest effectively managed*
- *There should be a mandate for the system operator to work across multiple vectors and not just be accountable/responsible for the electricity network*
- *Synergies may not be maximised by assigning responsibility to institutions if that institution does not have the necessary experience or capacity to fulfil the role*
- *There are concerns that the system operator may not be mandated to feedback into the local authority to create a feedback/information loop where everyone is able to benefit.*

**9. Out of the framework models we have developed which, if any, offer the most advantages compared to the status quo? If you believe there is another, better model please propose it.**

*RESO in its purest sense fits best in the third option. We recognise practicalities and constraints and see that this could be a branch of the FSO if the governance was set up correctly. We effectively trialled option 4 and this could provide an interim solution with much clearer roles for the parties involved, however, there are issues in that it places "Market Facilitation" outside the scope of the interaction between LAs and IDSOs, the LAs only have a remit in providing information to the IDSO without also receiving contractive interaction in return. In terms of size, we feel that geographic areas based around DNO licence areas would be most appropriate.*

**10. What do you consider to be the biggest implementation challenges we should focus on mitigating?**

- *Deciding on the scale of the system operator and beginning to draw the boundaries around these*

- *Alignment of infrastructures and planning these as one system*
- *Finding the capacity to integrate improved data collection practices at the local level, that will be used by the new system operator to advise long-term planning and day-to-day operations*
- *How a local ecosystem of data services can support national level efforts in data and digitalisation*
- *UK local authorities are historically under-resourced and not immediately able to take on the range of specialist functionalities that a RESO would require of them. Whilst this doesn't impact the logical arguments for a RESO, it does make it challenging to ensure necessary linkages to detailed local planning authorities and local democratic accountability are made effectively, while also reassuring those responsible for the national energy system security that this will not come at the expense of increased risk*

**11. Taking into account the varying degrees of separation of DSO roles from DNOs under framework model 1, do you consider there are additional measures we should consider implementing, in particular in the short term (e.g. changes in accountability etc)?**

- *Stricter accountability on the internal governance that manages any potential conflicts of interest*
- *External management of plans to ensure that decisions made and carried out are for the interest of the consumer and vulnerable customers are protected*

**12. Are there other key changes taking place in the energy sector which we have not identified and should take account of?**

- *The changing UK energy map and the differential impact of the energy transition on places, based on their natural resources.*

**13. What do you consider to be the most important interactions which should drive our project timelines?**

- *The establishment of the FSO*
- *The role of Local Area Energy Planning to identify the needs of an area*
- *Interactions with stakeholders responsible for;*
  - *Market creation*
  - *System operation*
  - *Data management*

**Annex I: Draft West Midlands Trailblazing Devolution Deal Proposals 2022, which we would welcome OfGEM's views on as a first step towards revising local energy governance**

<b>1. TDD ask: A duty to co-ordinate LAEPs</b>			
<b>Powers we are seeking</b>	<b>Who from and how</b>	<b>Current status</b>	<b>The problem this solves</b>
1.1 A duty on the Combined Authority (CA) to raise funds and co-ordinate LAEP development across the region.	<p>A new duty would be created by BEIS clearly setting out roles and responsibilities of all parties, including the WMCA, local authorities and DNOs.</p> <p>Initial funding would need to be devolved from BEIS, or an agreed mechanism to raise this funding would need to be established, for example through agreed contributions from the DNOs, combined with transport planning funding.</p>	No powers currently exist and roles are currently unclear, with different approaches being taken, utilising different funding streams (see ESC research).	<p>By devolving these powers and funding through the Trailblazing Devolution Deal route, it will enable swift progress to be made by those in a good position to proceed; lessons to be learned on the way to establish a suitable mechanism for all areas to proceed and it will avoid vested interests shaping the outcomes of the LAEP process.</p> <p>The WMCA would provide support all its LAs in coordinating the procurement and contracting of LAEPs, providing the management and technical expertise to support this process.</p>
1.2 An ongoing duty on the CA to co-ordinate the integration of the outcomes of the LAEP process, with spatial planning, transport planning and energy planning functions.	<p>A new duty would be created by BEIS.</p> <p>The WMCA would have a duty to maintain the LAEP data platform to ensure that this investment retains its value.</p> <p>The WMCA would provide the expertise to ensure that the LAEP and Local Transport</p>	<p>No powers currently exist. There is also no clarity on how the value of LAEPs will be harnessed. This would be a key feature of the Trailblazing Devolution Deal.</p> <p>Trailblazing this in the West Midlands would enable BEIS to utilise the West Midlands Net Zero Infrastructure</p>	<p>Placing a duty to co-ordinate the integration of LAEP outcomes with transport planning, takes advantage of the powers already devolved to the WMCA as the local transport authority.</p> <p>Additional responsibilities to support the integration of the LAEP evidence</p>



	Plans are integrated; that Spatial Plans across the region use the LAEPs as part of their evidence base to inform policy development; and work with the DNO/GDNO/NG to integrate the outcome of these plans into the energy company business plans (or reopeners) and subsequent investments.	Delivery Panel (NZIDP) as an existing mechanism to support this process and identify where additional powers are needed to ensure its effectiveness.	<p>base into spatial planning will support LA's to take advantage of powers they already have to establish Local Development Orders and produce Supplementary Planning Guidance, where they lack specialist energy expertise to do this.</p> <p>The existing agreement between partners making up the NZIDP, will provide a mechanism to agree the LAEPs with the infrastructure providers and directly influence their investment plans, enabling place-specific delivery, proven to be more financially advantageous than when a place-agnostic approach is taken.</p> <p>The existing political make up of the WMCA will provide democratic accountability and support the adoption of the LAEPs locally, enabling enhanced engagement with stakeholders from communities to infrastructure providers.</p>
1.3 A duty to input the outcomes of the LAEP zoning processes into spatial planning considerations (Double Devolution).	We propose to trial Energy Capital being designated as a statutory consultee for the West Midlands, much like the role GLA	The WMCA currently has no powers in spatial planning.	As identified in the Heat Commission recently completed by the University of Birmingham, this will establish a mechanism to

	occupies within Greater London within the spatial planning process (similar to previous duties held by the old Regional Development Agencies).		continually and actively feed LAEP outcomes into existing spatial planning processes to overcome local barriers to delivery of heat and LAE Plans; supporting the national implementation of heat zoning.
1.4 The opportunity to advise the new independent FSO on how to work with local partners, based on the learning from the WM RESO project and this Trailblazing Devolution Deal.	Following the completion of our Innovate UK funded PFER project, WM RESO, we would welcome a route to formally feed the outcomes of this work into the formulation of the FSO and its operations.	No formal route for engagement, only informal engagement currently.	This would enable the learning from the WM RESO project, about the value of considering place in the energy systems operation to be considered as part of the FSO development, maximising the impact of BEISs PFER investment.

<b>2. TDD ask: A mandate to designate (Energy Innovation/ LEAP) Zones</b>			
<b>Powers we are seeking</b>	<b>Who from and how</b>	<b>Current status</b>	<b>The problem this solves</b>
2.1 The mandate to propose and co-ordinate (Energy Innovation) Zones, including zero carbon industrial zones, home retrofit zones and heat zones (aligned with BEIS's current heat zoning plans).	Recognising there may be the need to amend policy and regulations to support the net zero transition locally, the Mayor would be given powers to designate 'zones' based upon the outcomes of the LAEPs, where these regulatory flexes could be explored and applied. Following due process, of objective setting and collaboration, the process is detailed in our EIZ definition	No powers to establish EIZs currently exist, however the concept was developed following the 2017 devolution deal.  Government is currently exploring the role of heat zones, with 2 pilot areas in the West Midlands. Many of those who responded to the consultation recommended that heat zones be extended to incorporate other aspects of energy.	Zoning would overcome policy and regulatory barriers that make it difficult to achieve net zero goals locally, without having to change national policy everywhere, making the changes politically more palatable (e.g. the potential for community wind zones etc?)  As highlighted by the recent Heat Commission, by the University of Birmingham, it is not feasible to provide

	study, undertaken in partnership with Cornwall Council, funded by BEIS.		electrical network upgrades, heat networks and hydrogen via the gas network to all homes to enable consumer choice. Choices have to be made by infrastructure providers.
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<b>3. TDD ask: A duty to target infrastructure investment where it is needed</b>			
<b>Powers we are seeking</b>	<b>Who from and how</b>	<b>Current status</b>	<b>The problem this solves</b>
3.1 A statutory role to work with the DNOs to agree where energy infrastructure investment is needed in the West Midlands through the price control process.	The WMCA will require designation as a statutory consultee by BEIS and OfGEM.	No powers currently exist. All parties have to opt into consultation processes, which assumes they have the ability to. DNOs are required to consult, but there are no requirements on local government to respond.	By giving the WMCA statutory consultee status and requiring DNOs to consult effectively, the results of the LAEP process will be considered and infrastructure investment targeted effectively to support the net zero transition and levelling-up.
3.2 The ability to trigger consideration of the use of Net Zero Reopeners and statutory role in agreeing what energy infrastructure investment is needed through the net zero reopener process.	Currently the Net Zero Reopener process remains unclear, but it is expected that reopeners will be triggered by the DNOs. We believe that this does not provide an adequate route to challenge investment plans of DNOs.	The reopener process for ED2 remains unclear.	This power would enable places to provide ongoing challenge as to whether DNO business plans are providing suitable investment to enable local net zero transitions.
3.3 To pilot, place-based organisations as statutory consultees in the OfGEM code review process, seeking to represent the best interests of	Energy Capital would trial being a statutory consultee, to represent the best interests of communities (informed by LAEP and EIZ processes)	No current powers exist.	This would enhance the consideration of communities, rather than just individual consumers, when OfGEM re-evaluate their practices.

communities, as opposed to individual consumers.	as opposed to just individual consumers.		
3.4 The mandate and support to establish pilot public - private investment mechanisms to target investment into specific zones, including investment into Net Zero Neighbourhood /Home Retrofit Zones through the UKCCIC model; investment from BEIS into the expansion of industrial clusters and trialling investment in reserving grid capacity within EIZs for demand or supply side needs with the DNO.	This would be enabled by the above processes of LAEP zoning, identifying clear areas where action will take place, but allowing these to be aggregated across a region to create market demand to attract finance and stimulate supply chain investment.	<p>With no mandate to act, capacity within the public sector is limited, making attracting investment very challenging.</p> <p>National studies are looking into the reasons why schemes aren't coming forward for investment, which the Energy Capital and Innovate UK SLES Investor Panel are supporting.</p>	<p>By working with both public and private investors the result will be that the EIZ can become self-sustaining and will not rely on public sector investment following early de-risking of innovative technologies/methodologies etc.</p> <p>In doing this the EIZs will support the levelling-up mission by regenerating local area economic activity, boosting community engagement and experience more inward investment for innovative activities by being viewed as an attractive and productive location to invest.</p> <p>This will result in a reduced dependence on central government funding for the area.</p>
3.5 The devolution / allocation of a proportion of OZEVs funding to Trailblazing CA's, to replicate the Project Rapid approach for rapid charging facilities on the key route network, enabling CAs to reserve capacity specifically to be	A reallocation of funding from OZEV.	Project funding already allocated nationally.	This would provide a mechanism to apply the same logic that has been applied to MSA's to the key route network, to support the development of a national network.

allocated to rapid charging stations to support fleet and haulage to support national objectives.			
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