Konark Anand & Dayna Rodger

Network Planning Review Team

Ofgem

***East Anglian Alliance of Amenity Groups 18/8/22***

Ofgem OTNR consultation, July/August 2022

**Consultation on Ofgem’s minded-to decision and draft impact assessment on the initial findings of the Electricity Transmission Network Planning Review**

The East Anglian Alliance comprises an informal association of amenity groups, countryside organisations and community representatives in Essex, Norfolk and Suffolk.

While each group has specific interests in relation to Ofgem’s consultation, they share common concerns about the significant impact on the region’s communities and countryside.

Views and concerns shared by members include the following.

* Alliance members welcome Ofgem’s acceptance that the TOs and other developers “need to take account of community and environmental constraints… when developing proposals…” (2.42) and the need for transparency (2.43). Members are concerned that such awareness is absent in some other recent OTNR strategy documents[[1]](#footnote-1) from BEIS and Ofgem.
* While commendable for its clarity, the document is not clear on how the transition to a CSNP system will be managed, nor how the process will affect in-flight and near-flight projects. Some of these projects will determine future transmission development in East Anglia. Due to the timeframe of projects that will fall within the HND, some major developments are excluded from consideration in the holistic design. Pathfinder arrangements also seem unlikely to facilitate adequate coordination. There is thus a real danger that key projects will ‘fall through the gap’. If the HND is an “ad hoc arrangement” (2.16) rather than the long term solution intended for CSNP, is it a useful step? A comprehensive CSNP may be a more effective and efficient alternative.
* In light of the above concerns, it seems essential that a fully transparent CSNP system is implemented as quickly as possible. Having accepted the need for change, it seems illogical to persist with an outdated current regime for projects that will determine what follows.
* The report seeks, once again, to deal with the prospect of stranded assets, weighing this risk against the problem of constraint costs. Given that NGESO estimates constraint costs could reach £2.5 bn annually[[2]](#footnote-2), further detailed analysis of these issues should be placed in the public domain.
* A review of FES, ETYS and NOA is urgently required (6.1). Current methodology is anything but transparent and the least worst regret methodology is a poor aid to holistic modelling, quite apart from being inappropriate in its current application.
* While the CSNP and FSO objectives are worthy concepts, there is a danger that if coupled with some of the proposed changes to the NPS, the result would be ‘planning by decree’ on a scale not seen in the UK outside wartime. This is not a consideration for Ofgem. Nevertheless, Alliance members will oppose any steps that give even greater planning control to centralised bodies.

John Foster

For the East Anglian Alliance of Amenity Groups

1. BEIS/Ofgem: *Electricity Networks Strategy: Enabling a secure, net zero energy system - August 2022* [↑](#footnote-ref-1)
2. Ibid p29 [↑](#footnote-ref-2)