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BY EMAIL

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Dear Mr Ananad

Centralised Strategic Network Plan: Consultation on framework for identifying and assessing transmission investment options.

Suffolk County Council welcomes this opportunity to comment on the development of processes and systems for the Centralised Strategic Network Plan (CSNP). The development of new transmission network infrastructure in Suffolk and the wider East Anglian region is a matter of significant public concern, and the current system planning, governance, consenting and engagement arrangements, have done little to effectively ameliorate those concerns.

The development of the Future System Operator (FSO), and a new approach to system planning, is an opportunity to engage with both the public and decision makers afresh, on the planning for, and consenting of, transmission infrastructure.

The confidence of the public and decision makers in the planning and delivery of electricity transmission infrastructure is essential, and the emerging new system must do all it can, to establish and maintain, procedural fairness; relationship quality; and public trust.

In summary, the response to this consultation is as follows:

- The emerging Future System Operator has the chance to secure greater trust and confidence, around the delivery of transmission infrastructure, by engaging effectively with decision makers and the public, it must grasp that opportunity.
- It is essential that the Future System Operator ensures that in the development of its methodologies and processes, it is transparent and robust in its consultation with relevant stakeholders and interested parties.

- It is essential to communicate the extent and magnitude of the system change required, to both decision makers and the wider public. Therefore, using a 2050-time horizon for system planning is appropriate.
- The Future System Operator should seek to develop a high profile, both generally with the public, and with decision makers, and not, as it has usually done to date, focus its communications on industry stakeholders, whilst leaving Transmission Operators to engage with decision makers and the wider public.
- Proposals for a consistent and robust approach to consideration of environmental and community impacts is essential and welcome. Given that this will be an important component of the CSNP, the methodology used, and the consultation and engagement processes around the development of that methodology, must be effective.
- The Future System Operator would be well placed to conduct Strategic Environmental Assessments (SEA). These are essential to allow the network plan to be given appropriate weight in the planning process, as suggested in the recent consultation on Energy National Policy Statements. However, the processes for consultation on the plan level SEA, with relevant non-departmental public bodies, *and local authorities as democratically accountable consultees*, must be robust, and transparent to the wider public.
- Material changes must trigger a re-evaluation of projects in the pipeline, to both respond effectively to change, and establish public confidence, that strategic system planning is responsive to change.
- It is essential that the Future System Operator has the capacity and skills to properly consider the climate resilience of the network in the long term, and the regulator can respond to, and support, the need for a climate change resilient transmission network.

Detailed responses to the questions in this consultation are appended to this letter.

Yours sincerely,



Richard Rout

Deputy Leader of Suffolk County Council and
Cabinet Member for Finance & Environment

Appendix A

Qn 1. Do you agree with our broad regulatory approach to establishing the FSO's obligations to deliver the CSNP products?

Whilst the broad regulatory framework proposed for the delivery of CSNP products is acceptable, governance of, and methodology for, the creation and operation of the CSNP is likely to be of significant public interest, given the extent and magnitude of transmission system change that is required now and in the future. It is essential that the Future System Operator ensures that development of these processes includes transparent and robust consultation with relevant stakeholders and interested parties.

Qn 2. What are your views on the types of system need that we have proposed are covered by the CSNP? Are there any gaps?

Proposals to change how system need is assessed appear likely to be significantly more granular and relevant to current needs, with year-round nodal assessment.

Qn 3. Do you agree that the time horizon for system need assessment should be extended to 2050?

Yes, to communicate the extent and magnitude of change required to reach net zero, to both decision makers and the wider public, a time horizon for system need assessment to 2050 is essential.

Qn 4. Do you agree that the FSO should move to a year-round nodal assessment of system need as part of the CSNP?

Yes

Qn 5. We welcome stakeholders' views on how the FSO can communicate effectively about future system needs?

It is likely that, given the uncertainties around the changes that will be required to the network in a dynamic generation environment, whilst it will be possible to effectively communicate the direction of travel, the specific outcomes or projects required, beyond a fairly short time horizon will be tentative, to a greater or lesser degree.

Decision makers, both locally and nationally, will need to clearly understand the limits of certainty regarding potential network configurations in the medium and long term.

However, once significant network changes in the short term become highly likely, it will be essential to communicate those effectively to both decision makers and the wider public, particularly in the affected areas, as soon as reasonably practicable.

The Future System Operator should seek to develop a public profile both generally with the public, and with decision makers, and not, as it has generally done to date, focus its communications on industry stakeholders, whilst leaving Transmission Operators to engage with decision makers and the wider public.

National Grid Electricity System Operator has made significant progress in this regard over the last decade, and it is essential that the Future System Operator builds significantly on that progress.

Qn 6. What are your views on the FSO establishing minimum design requirements for high-level option designs and are there areas where exceptions are needed?

Minimum requirements on high level designs are essential to ensure consistency and clarity of approach.

Qn 7. Do you have any views on our proposals for considering environmental and community impacts as part of high-level design of options?

Proposals for a consistent and robust approach to consideration of environmental and community impacts is essential and welcome. Given that this will be an important component of the CSNP, the methodology used, and the consultation and engagement processes around the development of that methodology, must be effective.

Subject to the development of an effective and robust CSNP methodology, it is agreed that the Future System Operator would indeed be well placed to conduct Strategic Environmental Assessments. These are essential to allow the network plan to be given appropriate weight in the planning process, as suggested in the recent consultation on Energy National Policy Statements. However, the processes for consultation on the plan level SEA with relevant non-departmental public bodies and local authorities as democratically accountable consultees must be robust, and transparent to the wider public.

Qn 8. Do you have any views on our proposal for the FSO to independently decide which network needs it may lead the high-level design of?

Given its overview of the GB grid it is reasonable for the FSO to develop system need options independently of Transmission Operators

Qn 9. Do you have any views on our proposal for the FSO to set out how and when third parties can be involved within the CSNP?

It is agreed that FSO should work with stakeholders to develop a section on identifying third party-led solutions as part of its CSNP Methodology

Qn 10. Do you have any views on our proposals on data exchange to enable the implementation of CSNP?

No comment

Qn 11. Do you have any views on our proposals regarding the principles to be followed in the CSNP decision-making framework?

It is agreed that improvement to the level of transparency and effective engagement are essential and that it should be as suggested; • Transparent • Based on open stakeholder engagement • Adaptive to change • Robust, consistent, and reproducible.

It is considered that such an approach is essential in order to foster trust, and support wider public consent, or social licence, for the transformational changes necessary to mitigate and adapt to the impacts of a changing climate.

Qn 12. Do you have any views on our proposals on the decision-making framework for selecting potential projects to address longer-term system needs?

No comments

Qn 13. Do you have any views on the decision-making framework to bring potential projects into the 'delivery pipeline' for nearer-term needs?

No Comments

Qn 14. We would welcome views on our proposal to not re-evaluate projects that are in the delivery pipeline, and whether a materiality trigger is appropriate and what criteria might be used?

A materiality trigger for revaluation of projects in the CSNP pipeline is essential. Clearly such a trigger will need to include changes to generation demand and in particular the operational date of relevant generation. However, material changes may also include other factors, such as significant and genuinely substantive new environmental information, or genuinely deliverable technological changes which mean that a pipeline project can be re-evaluated.

Qn 15. Do you have any views on our proposal on inclusion of environmental and community impacts in the CSNP CBA?

It is considered essential to include environmental and community impacts in the CSNP cost benefit analysis. It is also essential that the development of the methodology for the cost benefit analysis, as part of the CSNP methodology, secures public confidence and the confidence of decision makers.

The development of the CSNP supported by effective consideration of environmental and community impacts is an important opportunity to improve public confidence in the delivery of transmission infrastructure.

Qn 16. Do you have any views on our proposal for the CSNP to include a methodology for assessing and taking forward system operability solutions?

No Comments

Qn 17. Do you agree with our proposal for the ESO to review its current approach to assessing short- and long-term solutions, and for the FSO to set out its approach in the CSNP Methodology?

No Comments

Qn 18. Do you have views on our proposals for FSO to develop capabilities to consider different combinations of options and how this should be implemented?

It is agreed that FSO should develop capabilities to consider different combinations of options. The Council has no comments to make on how these should be developed or implemented.

Qn 19. Do you agree with our proposal to introduce a requirement, as part of the new CSNP licence condition, for the FSO to make recommendations on additional interconnection and OHAs opportunities between GB and other markets?

Yes

Qn 20. Do you agree with our proposal that the FSO should use reasonable endeavours to support relevant stakeholders as part of the offshore asset development process?

Yes

Qn 21. Do you agree with our proposal that the FSO assess third-party options under the CSNP and recommend delivery by competition where proposed solutions meet the relevant competition criteria?

No Comments

Qn 22. What are your views on whether changes to the SQSS or obligations on licensees are needed to support the CSNP – where specifically are these changes needed and when do they need to happen by?

No Comments

Qn 23. Do you agree that the FSO should evaluate the climate resilience of the long-term whole-system CSNP?

It is essential that the FSO build capacity to look at the climate resilience of the longer-term whole system CSNP.

Qn 24. Do you agree with the proposed position on the treatment of connections in the CSNP?

No Comments