

Ofgem
10 S Colonnade
London
E14 4PU

15 June 2023

Dear Representative of Ofgem

I am writing on behalf of Westmorland and Furness Council, responding to Ofgem's open letter published 16th May 2023 regarding future reform to the electricity connections process.

Firstly, for some context, Westmorland and Furness Council are a new unitary council, which operates in a largely rural area and has an ambitious target of Net Zero by 2037. We have large-scale challenges in securing grid capacity for a significant increase in renewable energy production in our area. We also have issues providing smaller scale, often rural, grid capacity improvements to complement a planned EV infrastructure network.

We share the concerns expressed in the 'challenge' section of the overview report, including the increased application volumes and attrition of the first come first served approach, and our council has experienced first-hand difficulty when trying to develop >1MW connections on our first solar farm project. We have also had difficulty with long lead times for connections during a recent EV charging project.

As an organisation, Westmorland and Furness intends to build more renewable energy facilities in the next 2 years and will continue to struggle to connect the size of infrastructure needed to meet our net zero objectives until either the network is improved, or connection limits are increased. The Council simply cannot afford to pay grid improvement costs associated with >1MW connections. We support the proposed changes to the first come first serve approach, however a further benefit to smaller developers would be to raise the limit before which grid upgrade costs are payable from

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<1MW to <3MW. This would allow construction of smaller scale renewable facilities which may be of particular use in rural areas.

We have heard from stakeholders with similar concerns around long connections times, and are engaging with Electricity Northwest to explore these issues through our strategic relationships. Long connection times makes it difficult for the council to confidently plan larger projects and interventions around renewable energy and electric charging infrastructure.

We have also had conversations with at least two other councils who have had their plans delayed by lack of capacity - at a time when we should be massively ramping up renewable energy supply.

We welcome and support the priority areas of focus set out by Ofgem, particularly providing clear strategic direction and driving license and incentive amendments. However, we urge Ofgem to ensure when engaging with industry and stakeholders that issues of rurality are considered. While we recognise the importance to scale up grid capacity nationally, and would like to engage with Ofgem, industry stakeholders and other rural councils to ensure that there is a balance between large-scale connection activity and targeted infrastructure for rural areas who are under threat of being left behind.

We also would like to see a greater role for local authorities when setting the strategic direction of the grid improvements, many of whom are setting more ambitious net zero targets than national government and are scaling up their activity. We are happy to be involved in further engagement activities with Ofgem, ESO, Electricity Northwest and national government.

We welcome the recent amendment to the Energy security bill, which provides a mandate and duty to Ofgem to support in the scaling up infrastructure work required to research regional and national net zero targets. We are open to continue support and engaging with Ofgem, providing local context from our rural council area.

Yours sincerely,



Cllr Giles Archibald,
Portfolio Holder for Climate Change and Biodiversity
Westmorland and Furness Council