

# Submission to Ofgem's call for evidence RIIO3<sup>1</sup>

- a. Organisation: Save Our Mearns
- b. Commenting on Scottish and Southern Energy business plan<sup>2</sup>
- c. Response is not confidential
- d. Issues identified and e. evidence or justification, below, as follows:

We set out in this document our concerns that SSEN's business plan pledges are not reflected in reality, with examples below:

SSEN's pledges to communities	Our experience with the TKUP project
We are committed to ensuring the energy transition provides exceptional value for current and future generations. While our ambitions are high, decarbonising while keeping the lights on is not enough. Electricity consumers, the communities in which we operate, and wider stakeholders expect us to achieve these goals responsibly, leaving a positive lasting legacy.	<p>SSEN have refused to consider alternative, and in the long term cheaper technology solutions which would have far lower community socio-economic and environmental impacts. The proposals put forward by SSEN will have severe negative impacts on the North East of Scotland, including:-</p> <ul style="list-style-type: none"> <li>• removal of prime agricultural land, risk taking with biosecurity endangering the UK seed potato industry,</li> <li>• a downturn in the important tourism industry due to visual and audio nuisance and occupation of tourism based accommodation by transient workers.</li> <li>• Loss of local spending power due to property market depression.</li> <li>• Loss of local recreational facilities by the felling of very large areas of forest and obstruction of outdoor access.</li> <li>• Increased flooding risk due to the removal of a very large area of carbon rich soil and large scale deforestation.</li> </ul>
As expected by national and local Government and by local communities, we are dedicated to ensuring the benefits of the energy transition are shared with our communities, leaving a lasting positive legacy.	<p>SSEN have failed to demonstrate any lasting community net benefits to the area impacted by TKUP. The socio-economic argument made in the, currently open, planning application for the Hurlie substation has been severely criticised by the local authority with unacceptable or poor responses to all issues mentioned in Aberdeenshire Council Community Wealth Building Strategy and Charter for new Energy Developments. On the subject of compensating rural residents negatively impacted, SSEN continue to refuse to even</p>
Throughout the lifecycle of our projects, we aim to work positively with local communities and keep people informed about what we are doing. This is particularly important when we are developing a proposal. We want to take the time to understand what local stakeholders think about our plans, listen to their feedback and where possible adjust our	<p>The SSEN consultation process has been a complete fiasco, so bad it was discussed by MSPs in the Scottish Parliament.</p> <p>In an Infrastructure Stakeholder Engagement Survey (ISES) created by SSEN for submission to OFGEM, 7% of respondents said they were satisfied (compared with 34% in last year's (2023)survey) and 70% said they were dissatisfied (14% in last year's survey). Nearly half (48%) gave a score of 1/10.</p> <p>SSEN have consistently failed to understand the concept of consultation being a two-way communication. They have totally refused to listen to the pleas of rural populations who have requested time and time again that SSEN provide a long-term costings comparison between their</p>

<sup>1</sup> [https://www.ofgem.gov.uk/sites/default/files/2024-12/RIIO-3\\_Call\\_for\\_Evidence.pdf](https://www.ofgem.gov.uk/sites/default/files/2024-12/RIIO-3_Call_for_Evidence.pdf)

<sup>2</sup> <https://www.ssen-transmission.co.uk/globalassets/documents/riio-t3-documents/ssent-riio-t3-business-plan.pdf>

proposals to reflect this.	preferred option , monster onshore pylons/ substiations and an integrated offshore grid with energy islands and subsea cabling and underground HVDC cabling when there is no alternative to shore based routes. SSEN have also refused to listen to demands for an independent medical study of the mental health and other health effects of their planned projects on the communities. They describe the mental health impacts as “uncertainties”. The so called consultations have simply been SSEN informing the population of their already formulated plans.
We want to hear people’s views, concerns, or ideas and harness local knowledge so that our work brings positive benefits to the communities where we are working, today and long into the future. We deliver this engagement at scale across our network area with over 50 ASTI and 22 RIIO-T2 project consultation events undertaken in 2024 with around 4,500 attendees at these events.	SSEN have heard people’s views, but they have generally ignored them. SSEN say they moved the Fiddes substation to Hurlie in response to public opinion, not admitting that they wanted to move the substation in order to expand the development area from 120 acres to 720 acres in order to provide even more connections to windfarms, solar farms, battery storage and other industrialisation. In their January 2025 report of consultation for the TKUP project SSEN have to admit “feedback from the community was generally not supportive of SSEN Transmission’s approach to delivering the Pathway to 2030 programme, or of the Potential Alignment for the Proposed Development in each of the Sections A to F and / or the Alternative Alignments that were considered at eight locations”
In RIIO-T3, we will not only continue to deliver BNG (now a planning requirement) but commit to: Deliver at least 10% biodiversity net gain and leave a positive legacy for nature.	The SSEN interpretation of biodiversity net gain appears to amount to planting an unknown number of trees at an unknown location, probably miles away from the area where they have created massive negative environmental impacts.
A thorough understanding of stakeholder needs and expectations of us and our network has been gathered through ongoing relationship-based engagement and gathering of insight and feedback in the development of strategies that will apply during the RIIO-T3 period and beyond. Our stakeholder-led strategies have defined our plan’s content, with expert challenge and benchmarking ensuring ambitious and efficient targets and outcomes. Given the scale of infrastructure to be delivered in the RIIO-T3 period, we are necessarily adopting new approaches in our engagement, digitally enhancing the customer and stakeholder experience and increasing partnership approaches.	SSEN have a very delusional view of the customer and stakeholder experience. Their arrogant assumption that their preferred solution is the only possible outcome and will be rubber stamped by the Scottish Government regardless of how badly conceived it is and the unnecessary negative environmental and community impacts probably make them the most unpopular and least trusted company in Scotland.