

Regional Energy Strategic Plan policy framework.

[Regional Energy Strategic Plan policy framework consultation \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/regional-energy-strategic-plan-policy-framework-consultation)

OFGEM Consultation Questions

Appendix 5 – Full list of consultation questions

1. What are your views on the principles (in paragraph 2.8) to guide NESO's approach to developing the RESP methodology? Please provide your reasoning.

Overall they seem reasonable, however there are some shortcomings:

It is not clear why ofgem continuously and rather insultingly continue to exclude the main areas from which the future of the UK's energy will come. None of the maps within this document contain Orkney or Shetland. This perpetuates the impression that Orkney has that ofgem is out of touch with developments underway and planned. An explanation, or rectification of this omission would be in order.

The need for regional planning is clear. It is not clear however that the local authority would be a competent contributor to discussions on energy planning and so other actors should also be sought. Some funded local committees would appear to be in order if this is not to be centrally driven and prone to the inadvertent gaffs already alluded to. Local knowledge will improve planning and delivery.

2. Do you agree that the RESP should include a long-term regional vision, alongside a series of short-term and long-term directive net zero pathways? Please provide your reasoning.

Yes.

3. Do you agree there should be an annual data refresh with a full RESP update every three years? Please provide your reasoning.

Yes although online tracking of progress should also be enabled to help maintain a sense of progress.

4. Do you agree the RESP should inform the identification of system need in the three areas proposed? Please provide your reasoning, referring to each area in turn

Strategic direction setting: modelling supply and demand	Strategic direction setting: identifying system need	Technical coordination
<p>Component</p> <ul style="list-style-type: none"> • A long-term vision and agreed priorities. • Short-term pathway and multiple long-term pathways that show energy supply and demand projections. 	<p>Component</p> <ul style="list-style-type: none"> • Information to guide system needs including consistent assumptions. • Spatial context of projections. • A narrative to steer strategic investment. 	<p>Component</p> <ul style="list-style-type: none"> • A set of coherent plans (RESPs and network plans) which resolve gaps and inconsistencies and identify whole system opportunities.

Broadly yes, however there are significant risks that this will result in a ‘one size fits all’ approach when local needs will be different. The means by which local matters will be accommodated remains a significant concern.

There is however a need for a degree of central planning and vision, something that has been sorely missing in the UK since privatisation. OREF supports the drive to create the vision and plans to deliver it, provided the means to provide input are in place and that the vision is honest and in service of both net zero and the population.

5. Do you agree technical coordination should support the resolution of inconsistencies between the RESP and network company plans? Please provide your reasoning.

Yes.

6. What are your views on the three building blocks which come together to form the RESP in line with our vision? Are there any key components missing?

See above.

7. Do you agree with the framework of standard data inputs for the RESP? Please provide your reasoning.

Yes.

8. Do you have any suggestions for criteria to assess the credibility of the inputs to the RESP?

Yes, however there is not time enough to outline them here. We would be willing to do so if you would find that useful. In addition it will be necessary for these to be co-created with the community over time.

9. Do you agree with the framework for local actor support? Please provide your reasoning.

Broadly yes, however 3.57 seems a bit cheap. If we accept that planning will be better with local input then it seems reasonable to recognise that this betterment will have value. To not pay for betterment seems perverse and cheese paring. As a remote community we are used to being asked our opinions by paid consultants and by paid members of the DNO etc, but we are not paid or even compensated for expenses. This imperious approach of expecting locals to rally round to hear the great words of the visitors needs to stop.

You will need local input and you should pay for it just as you pay for other professional input. We may not be expert on the matters for which you employ consultants, but we are experts in our area and that needs to be respected and remunerated.

10. Do you agree with the purpose of the Strategic Board? Please provide your reasoning.

Yes.

11. Do you agree that the Strategic Board should include representation from relevant democratic actors, network companies and wider cross-sector actors in each region?

Definitely yes, however the range stated runs the risk of failing to engage local expertise. If you limit local involvement to local authorities then it will fail to receive the expert input that the tasks will require.

12. How should actors (democratic, network, cross-sector) be best represented on the board? Please provide your reasoning, referring to each in turn.

See 9. above.

13. Do agree with the adaptations proposed for Option 1? Please provide your reasoning.

No comment

14. Do you agree with our assessment that Option 1 is a better solution than Option 2? Please provide your reasoning.

No comment

15. Do you agree a single region for Scotland is optimal? If you think a two region solution is better, do you agree the split should occur at the SSEN and SPEN DNO boundary? If not, please provide your reasoning and alternative option(s)

OREF is torn on this matter as the dealings with the SSE as the DNO has been consistently disappointing, lacking in empathy or vision and of poor quality over many years. SPEN as the adjacent DNO seem more competent and so a conjoined planning boundary might mitigate some of the shortcomings we have seen locally. On the other

hand, the conditions in the Isles is dramatically different to other parts of Scotland and limiting it to 2 areas for Scotland also seems too crude and OREF would propose more granularity still.

Since it is unlikely that more than 2 areas will be countenanced for Scotland, there seems to be a slight advantage in a unitary approach because although the Planner will be more remote, it is likely to be less worse than we have seen to date with SSE.

Neil Kermode OBE
OREF Joint Chair.