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By email to: resp@ofgem.gov.uk
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Our case ID: 300075319
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Dear Fiona Campbell

Ofgem Regional Energy Strategic Plan policy framework consultation

Thank you for consulting us on the above policy framework.

Historic Environment Scotland is the lead body for protecting, understanding and sharing Scotland's historic environment, for today and for the future. Our vision as expressed in our corporate plan [Heritage for All](#) is that we want to use the past to make a better future. We want the historic environment to make a real difference to people's lives: to our health, to our economy, to our culture, to our environment. We want heritage to involve everyone so that we all benefit.

We also lead and enable the delivery of [Our Past Our Future](#), Scotland's historic environment strategy.

We have focussed our response on two of the consultation questions, and our comments are as follows.

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.

We agree that there is a need for the Regional Energy Strategic Plan (RESP) to take a place-based approach to energy system planning. We welcome the inclusion of this as the first principle.

Following on from this, it is unclear from the consultation document how it is envisaged that the plan will take account of devolved matters, including planning, at the implementation phase. This should be clarified in the final plan.

We welcome the proposed whole system approach, although we note that the plan does not include reference to reducing demand and the implementation of energy efficiency measures. Instead, the RESP appears to focus on growth in terms of both demand and



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the need for more infrastructure. It would be helpful if the glossary definition were amended in the final plan to clarify whether these measures form part of a whole system approach or not.

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

We welcome reference in chapter 3 to Local Heat and Energy Efficiency Strategies (LHEES) as a key reference in the development of the RESP. LHEES delivery plans should also form a key part of the evidence base for the development of the RESP. However, energy efficiency is a key aspect LHEES and this is currently missing from the RESP policy framework. It is not clear how this will be taken into account in the final plan and it would be helpful if this could be clarified.

Yours sincerely

Historic Environment Scotland