

Robert Hull
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Dear Mr Hull

Consultation: Connecting the Islands of Scotland

Thank you for the opportunity to submit some short comments on the consultation above. RSPB Scotland has over 75,000 members in Scotland and over 1 million across the UK. On their behalf, we engage in a broad spectrum of activities including managing nature reserves, educational projects, research, policy advocacy and, of particular relevance in this instance, matters relating to the issue of climate change. We believe climate change to be the most serious long-term threat to wildlife in the UK and that renewable energy generation is one of the means by which the greenhouse gasses that cause climate change can be reduced. One means of doing this has been the development of our Green Energy scheme which is operated by Scottish and Southern Energy (SSE).

We support the ambitious targets for renewable generation set by the Scottish Executive and as an organisation regularly consulted by renewable energy developers we have seen our casework load grow in tandem with the sector overall. We are currently involved with approximately 400 proposals a year of which the majority are renewable developments.

Some of these proposals are located on Scottish Islands, including those highlighted in your consultation – Orkney, Shetland and the Western Isles. Our views on any proposal are based entirely upon the potential environmental impacts arising from individual developments and as a result, we have outstanding objections sitting with the Scottish Executive in relation to two of the large wind farm applications on the Western Isles. We are in close discussion with Viking Energy regarding the proposals for Shetland and we are hopeful that the constructive working relationship we have developed will allow for a positive outcome, however, we are not yet in a position to comment in detail as the application has yet to be submitted. On Orkney we have been working closely with the European Marine Energy Centre to ensure that the trial projects are subject to an appropriate level of monitoring but not to the extent that innovative ideas are hampered by unreasonable costs.

We have also been part of the Scottish Executive Group overseeing the Marine Wave and Tidal Strategic Environmental Assessment and we are keen to promote the responsible and informed development of future renewables both on and offshore.

From this background, it is perhaps no surprise that the extent to which the transmission and distribution system can either help or hinder the development of renewables has become a matter of some interest to us.

In general terms the precise mechanism for regulating or facilitating the development of Island connections is perhaps of less importance to the RSPB than the conditions imposed upon it.

In broad terms, our concerns relating to the provision of grid infrastructure focus on the following issues:

- The extent to which the location or capacity of additional grid capacity in any area will encourage future proposals. In particular we are concerned that grid infrastructure could place undue pressure on sensitive locations to accommodate additional development;
- We are anxious that the provision of grid infrastructure should not be considered as any indication that applications for development consent must be granted;
- Developers must take on the full risk that generation capacity could be refused for any number of reasons – including environmental;
- That, regardless of the regulatory mechanism selected there must be an obligation to accommodate micro-generation or generation from community developments on a fair basis;
- That whichever approach is selected it must facilitate the development of next-generation renewable technologies, including wave and tidal.

The consultation paper identifies three options currently under discussion. The first of these, the 'status quo' is not something we wish to comment upon specifically other than to highlight the bullet points above. The second option 'Merchant Approaches' does appear to offer the possibility of some duplication of effort and/or expenditure. It is also unclear how this approach could effectively address the potential future demand arising from next-generation technologies.

The final proposal, that of 'Tendering to build a connection and obtain a regulated revenue', does, on balance offer some advantages, particularly in terms of the licensing of Transmission Operators (TOs). We would be supportive of the idea of conditions that would need to be met were a licence to be granted (again – see bullet points above). We are also supportive of the suggestion that determining a winner would hinge on factors wider than price alone. It would seem logical and necessary for the tendering process to reflect the legal duties placed upon Ofgem including those relating to sustainable development and the environment.

I trust these observations are helpful and hope that we can remain involved in the consultation process as it progresses.

Yours sincerely



Anne McCall
Head of Planning and Development