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Via email RIIO.T1@ofgem.gov.uk

Date: 4th February 2011

Dear Grant,

Consultation on RIIO-T1 RenewableUK and Scottish Renewables response

RenewableUK (formerly the British Wind Energy Association (BWEA)) is the trade and professional body for the UK wind and marine renewables industries. Formed in 1978, and with over 630 corporate members, RenewableUK is the leading renewable energy trade association in the UK, representing the large majority of the UK's wind, wave, and tidal energy companies.

Scottish Renewables is the representative voice for the renewable energy industry in Scotland, influencing the legislative, regulatory and financial framework to deliver the best possible conditions for the industry's growth on behalf of over 300 member organisations. The renewables industry is playing a crucial role in Scotland's efforts to tackle climate change and increase the nation's energy security, and must continue to do so in order to meet renewable energy and greenhouse gas emission reduction targets.

1) Summary:

We welcome RIIO and the aim to have sustainable networks delivering largely decarbonised electricity by 2030. A key step on that journey is delivery of the 2020 renewables targets and the growing contribution of renewables in the following decade.

We continue to develop and support our proposals for a Low Carbon Economy Incentive (LCEI) which will ensure that the network companies are engaged, innovating and playing their vitally important role in the 2020 renewables target and 2030 decarbonisation goal.

The Committee on Climate Change has determined that decarbonisation of electricity by 2030 is the most economic path for the UK economy to reach the Government's 2050 target for 80% reduction in greenhouse gas emissions, and hence this path is the lowest cost option for electricity consumers present and future.

We note Ofgem's assessment criteria in RIIO (section 6.13 of RIIO Handbook) but have not yet seen any assessments by Ofgem of the various proposals using these criteria. We look forward to seeing this analysis.

In Ofgem's process there has been an underlying assumption that certain output measures are already included and that others are optional. We want to see Ofgem conduct rigorous assessments of all proposed measures and only then determine which will be included and the associated levels of incentives.

Our LCEI will help the companies to find new and innovative ways of meeting market demands which will be primarily for low carbon generation. It does not mean that network companies will discriminate against the connection of fossil fuel generation as the companies have licence conditions to satisfy. In fact, other generation will also benefit from innovations, changes in practice etc. as can be clearly evidenced by Connect and Manage promoted by and for renewables, but which has also benefited significant amounts of fossil fuel generation.

2) Introduction

Our comments are focussed on electricity transmission and comprise the following sections responding to two of the consultation papers:

1. Summary
2. Introduction (this section)
3. Low Carbon Economy Incentive
4. Benefits to customer of RenewableUK proposals
5. Response on Overview Paper
6. Response on Outputs and Incentives Paper
7. Further engagement

We have not replied to all questions although we have listed them in our response. Some of our opening remarks under each chapter heading may be considered relevant to the questions listed.

3) Low Carbon Economy Incentive

RenewableUK's Low Carbon Economy Incentive (LCEI) is summarised starting in Section 5.24 of the T1 Outputs and Incentives Paper. It is more fully described in the attached RenewableUK Policy Paper.

4) Benefits to Customers from RenewableUK proposals

We put forward a view of the savings to customers which in our view would come from our LCEI output measures.

- 1) We expect that incentivising the companies would bring forward 1GW per annum with an expected >£500m in CO2 savings over the price control period.
- 2) Savings to customers due to meeting targets. If targets are not being met we assume that government would have to increase support mechanisms (e.g. ROC values, headrooms, FIT and/or proposed EMR support schemes). In addition a lack of competition in the market would result in higher prices for low carbon energy specifically and energy in general. However if targets are met there is a downward pressure on prices. For example if due to increasing deployment and meeting of targets the ROC value decreased from 50.00 to 49.00 £/MWh a saving of 2% on about £1billion per annum of support schemes would have a value of £20m per annum or £160m over the price control period..
- 3) Connection costs assuming that 3GW connected per annum with transmission costs (connection / local / wider) at £300k/MW = £900m/ annum. Assuming a 1% saving due to innovations = £9m/ammum savings which we assume will be passed through to consumers i.e. £72m over price control review period.
- 4) Operation and constraint costs. The incentive would drive improvements to system management and operation with innovation to reduce these costs.
- 5) Savings in development cost of projects and aborted projects due to better processes, engagement, information and innovations. Assume 5GW of new generation projects developed every year at a cost of £1m per 50MW – development cost is £100m/ annum. Saving of 2% supposed. Savings to industry with assumed pass through to customer in terms of competition and costs = £2m per annum and £16m over price control period.

In summary these saving are £748M over the 8 year price control review period. Hence the LCEI proposal includes a possible incentive of up to £320m over the price control review period for the three electricity transmission businesses.

We will carry out further consultations and analysis over the coming weeks to check and review these figures and assess an optimal value for the customer.

5) RIIO-T1 Consultation on strategy for the next transmission price control - RIIO-T1 Overview paper

CHAPTER: One Introduction

Question 1: Do you have any comments on the proposed process and timetable for the review?

We would have preferred more time to discuss RIIO in the round outside any particular price control review. RenewableUK proposals for a LCEI have been designed to be applicable to electricity transmission and distribution and in principle could be adapted or applied to gas transmission and distribution.

CHAPTER: Two Context

Question 1: Do respondents consider there are any interactions with other policy areas that have not been highlighted in this chapter?

No comment

Question 2: Do respondents consider that the transmission and gas distribution price control periods should remain aligned for future review periods?

It would ease resourcing in some companies, in Ofgem and in stakeholders if price control reviews were staggered. If there are advantages in being simultaneous then electricity distribution should be aligned as well.

CHAPTER: Three Making sure stakeholders' views are heard

Question 1: Do you have any comments of the overall approach to stakeholder engagement?

We welcome the efforts to stakeholder engagement made by Ofgem and the companies. We welcome increased involvement of the wider stakeholder community in the price control.

Question 2: Do you have any views on how our engagement process and that of the network companies could be made more effective?

Ofgem could have provided more background on the financial operation of price controls to help inform the development of output measures and incentives under RIIO. We would welcome increased transparency in relation to the process, where possible.

CHAPTER: Four Determining and incentivising output delivery

Question 1: Do you consider the proposed outputs and associated incentives, along with the other elements of the proposals, will ensure companies deliver value-for-money for consumers and play their role in delivering a sustainable energy sector?

We have proposed a LCEI which is necessary to ensure the companies will deliver in the sustainable energy sector. As the Committee on Climate Change has demonstrated in their economic modelling, decarbonisation of electricity by 2030 is the lowest cost means for the UK consumer to achieve the 2050 targets for 80% emissions cuts. The proposed LCEI output measure(s) will therefore deliver long term value to the consumer.

Question 2: Do you consider that the proposed outputs and incentive arrangements are proportionate?

No additional comment

Question 3: Do you have any views on the proposed outputs or incentive mechanisms?

No additional comment

CHAPTER: Five Assessing efficient costs

Comment under Question 4.

Question 1: Is our proposed approach to cost assessment appropriate?

Question 2: Do you have any views on our proposed process for proportionate treatment?

Question 3: Do you have any views on the criteria for assessing business plans? Are any of the criteria highlighted inappropriate? Should any additional criteria be added?

Question 4: Do you have any views on the proposed role for competition in third party delivery?

We welcome the role of third party delivery where it can bring extra investment and more effective delivery of network capacity.

In our view generators could be (or could appoint) those third parties. Where third parties are contracted by generators there is much more control of the contractual terms and a greater ability to manage the relationship between cost, timescales and specification. E.g. a generator may want to take time to identify a contractor who can deliver a lower cost

solution over a longer timescale or alternatively a heavily incentivised (liquidated damages) contract to deliver at a specific time. At the moment generators do not have any transparency or negotiating power in the contracts with the companies to secure either market priced solutions or firm connection dates with meaningful contractual penalties.

TOs should provide more transparent offers particularly in relation to non-contestable works. This would help generators to apply an element of competitive of competitive pressure. Vague non-negotiable terms give TOs a dominant position. However, flexibility is also very important so increased transparency should not lead to totally rigid standard terms.

CHAPTER: Six Uncertainty Mechanisms

We understand that forecasting the levels of generation connecting to an individual network is difficult and prone to a degree of uncertainty, and therefore the investment required in connection assets is also uncertain. The forecasting is even more challenging over an 8 year price control. In addition the planning process for new assets is not in the control of the companies (though they can influence outcomes). Therefore we think that a “volume driver” for the quantity of generation connected seems a sensible mechanism. Without such a mechanism, the companies may receive windfall revenue if they have connected less generation than forecast or could be in a potential deficit situation if more generation comes forward than was forecast.

No specific answers to the questions in addition to above.

Question 1: Do you have any views on the uncertainty mechanisms identified?

Question 2: Are there any additional uncertainty mechanisms required that we have not identified?

Question 3: Are there any mechanisms that we have included that are not necessary and, if so, why?

CHAPTER: Seven Innovation

We welcome the emphasis on innovation which is needed to integrate renewables and decarbonise electricity at the lowest cost to the consumer. Innovation is needed in all areas: in network design, reinforcements and delivery, network and system operation, contracts, ancillary services, codes rules and regulations and changing company cultures.

Innovation is not an end in its own right but is there to support some other goal. Therefore output measures are needed that will drive and deploy innovation. In the IFI for DNOs we have seen a focus on innovations which will reduce CMLs and CIs which is strongly incentivised. Hence DNOs have responded positively to an output measure in their innovation activities.

If rolling out particular innovations will cut company costs, the companies will implement these measures and increase returns.

However, if rolling out other innovations will cost the companies money there is no reason to deploy them, even if these innovations result in lower costs for users and hence lower costs elsewhere in the energy markets. However, if output measures are in place which will be satisfied by deploying innovations, such innovations are likely to be deployed.

If Ofgem wants the companies to innovate in order to deliver sustainable networks and move to the low carbon economy, an output measure will be necessary.

We note in Section 7.2 Ofgem expects companies to identify “innovative technology, techniques or commercial strategies” and their roll out in their business plans. Ofgem are not identifying innovation here but the deployment of existing innovations. By definition, true innovations are unknown to the companies at the time of writing the business plans. There must therefore be some mechanism to drive new innovations and their deployment even after the business plans are written.

No additional comments under the questions.

Question 1: Do you have any views on the role of innovation in RIIO-T1?

Question 2: Do you have any views on the time limited innovation stimulus?

CHAPTER: Eight Financing efficient delivery

No comments

Question 1: Do you consider that the package of financial measures identified will enable required network expenditure to be effectively financed?

Question 2: Do you have any views on our proposed approach to depreciation?

Question 3: Do you have any views on our preferred approach to implement any transition arrangements over one price control period where possible?

Question 4: Do you have any views on our preferred approach to remunerating the cost of debt?

Question 5: Do you have any views on our proposed approach to assessing the cost of equity and the associated range of 4.0-7.2 per cent?

Question 6: Do you have any views on other elements of our financial proposals?

6) RIIO T1 Consultation on strategy for the next transmission and gas distribution price controls - RIIO-T1 Outputs and incentives

Chapter 1 Introduction and context

Question 1: Do you have views on the approach we have undertaken to developing the outputs framework?

The stakeholder engagement has been positive. We suggest that in future Ofgem could do more to set the overall financial framework and to provide stakeholders with examples, guidelines and benchmarks in respect of previous incentives, price controls etc to help stakeholders formulate and assess proposals.

We note Ofgem's assessments criteria in RIIO (section 6.13 of RIIO Handbook) but have not yet seen any assessments by Ofgem of the various proposals using these criteria. We look forward to seeing this analysis.

In Ofgem's process there has been an underlying assumption that certain output measures are already included and that others are optional. We want to see Ofgem conduct rigorous assessments of all proposed measures and only then determine which will be included and the associated levels of incentives.

Question 2: Do any of our proposed output measures present potential difficulties in ensuring the submission of accurate and comparable data?

There are insufficient details in most of the proposals to assess this at this stage. Undoubtedly there will be challenges. The losses incentive in DRCP5 ran to 17 pages with additional regulatory guidance. The inevitable complexity of defining any output measure should focus Ofgem on assessing which measures are fundamental to RIIO and which best address the challenges.

Ofgem must strongly resist the temptation to select simple business as usual measures which may be well understood but which do not address the key challenges of RIIO.

Question 3: Are there any aspects of our proposed outputs framework where the reporting requirements are likely to lead to disproportionate regulatory costs?

All outputs have a regulatory cost therefore Ofgem should concentrate on a few material measures and avoid a plethora of micro-management measures.

Question 4: Do you have any views on whether in principle it is appropriate to consider requiring the companies to do more to verify their regulatory reports?

Disclosure reporting and verification should be in accordance with good practice in other industries and internationally.

Question 5: Should we introduce an independent examiner for the TOs to improve regulatory reporting?

No additional comments

Chapter 2 Safety outputs and incentives

Question 1: Do you have any views on the primary output and secondary deliverables for electricity and gas transmission safety?

Safety is of paramount importance but is already subject to legal requirements and penalties and therefore we believe should not be part of the RIIO regulatory incentives.

Question 2: Are these appropriate areas to focus on and are there any other areas that should be included?

No additional comments

Question 3: Do you agree with the proposed approach to setting safety incentives?

No additional comments

Chapter 3 – Reliability and availability – electricity transmission

We are generally supportive of the Energy Not Supplied (ENS) incentive. However we are very concerned if this and the secondary measures were to produce perverse outcomes detrimental to other objectives. We note that innovations, smart grids, connect and manage and reducing constraints all involve new risks, and whilst we would expect TOs to manage those risks, the incentive must not diminish progress toward these other activities.

No further comments on questions below except Question 4.

Question 1: Do you have any views on the primary output and secondary deliverables for electricity reliability and availability, including:

- (1) are these appropriate areas to focus on?
- (2) are there any other areas that should be included?
- (3) do you agree with the proposed approach to setting reliability incentives?

Question 2: Do you have any views on our proposed treatment of different loss of supply events when calculating ENS including:

- (1) events lasting three minutes or less?
- (2) events that cause electricity not to be supplied to three or fewer directly **connected parties?**
- (3) events resulting from actions to ensure public safety, third-party damage, severe weather and other exceptional events?
- (4) planned outages?
- (5) events on an adjacent system?

Question 3: Do you have any views on our proposed options for applying financial

consequences in the case of material under or over-delivery of secondary deliverables?

Question 4: Do you agree with our proposed approach to incentivising the TOs for the impact of planned outages on constraints, including:

(1) is it appropriate to incentivise TOs?

(2) if so, should the incentive be broadened to other areas - for example, unplanned interruptions?

(3) are the confidentiality issues around constraint costs material and if so, how might they be resolved?

(4) is there a need to review the procedure for incorporating the full cost of cancellation to the TOs?

We recognise that it is important for TOs to take appropriate measures to reduce constraints. However we are very concerned that a specific financial incentive will result in delays to “connect and manage” connections as this is by far the quickest and easiest way of controlling constraints. The “connect and manage” regime is very flexible and open to interpretation (and we support that approach) and therefore there is considerable scope for including or excluding schemes at the margins.

RenewableUK’s proposed LCEI would provide an incentive to reduce constraints wherever these aided the low carbon economy which would generally be the most expensive and common constraints.

Chapter 4 – Reliability and availability – gas transmission

No comment on this chapter

Chapter 5 Environmental Outputs

Question 1: Do you have any views on the environmental outputs outlined?

We welcome the separation of the of the TOs direct impact on greenhouse gas emissions and their role transporting electricity with its massively greater impact on greenhouse gas emissions (due to both carbon emitting generation and inefficient end use.)

We are pleased that Ofgem has recognised that power station emissions at 149MtCO₂ in 2009 dwarfed losses at 3MtCO₂. We are disappointed that Ofgem has not analysed and discussed the materiality of these contributions as the emissions for generation totally dwarf emissions due to losses, SF6 and BCF combined.

Question 2: Are these the appropriate areas to focus on and are there any other areas in which primary outputs and secondary deliverables should be set?

No other areas needed.

Question 3: Do you agree with the proposed approach to setting environmental incentives?

As per the RIIO handbook, the approach should focus on the Materiality of the impacts.

Question 4: Do you have any views on what the TOs 'full role' in a low carbon economy may involve by the year 2020?

We have set out a number of areas in our document [ANNEX 1] where the SO TOs and DNOs can impact on both 2020 and 2030. We expect an incentive on the businesses will deliver other behaviours and developments due to the processes of innovation.

Question 5: What role is there for a primary output in RIIO-T1 on TO's contribution to the UK's environmental and energy objectives and what type of incentive would be most effective to drive TOs delivery in this area?

A primary financial output is vital as the key paradigm change for networks is decarbonisation up to 2030 and the 2020 renewables targets as a stepping stone to that goal. Trying to develop a number of incentives on specific behaviours linked to the paradigm shift leads to a much greater risk of missing the targets especially given the 8 year price control timetable and the degree of innovation and change expected in that period.

Question 6: Do you have any additional views on RenewableUK's proposal for a specific low carbon economy output including the form and size of such a reward mechanism?

We note that support for our proposal is growing and we continue to develop and refine the proposals including the value for customers.

Question 7: Do you have views on the relative roles of the TO and SO in relation gas shrinkage and venting, and how we might align the incentives between the two parties?

No additional comments

Question 8: What incentives should companies face to manage their carbon footprint?

We could expect to see the BCF increase due to increased activity in transmission required to lower UK emissions overall. There are already incentives and requirements in place e.g. the CRC and which can provide much wider benchmarking with other industries. The companies can have an effect on BCFs across the industry e.g. by reducing travelling emissions for stakeholders and customers. These will be difficult to measure and benchmark. We suggest that a reputational measure is sufficient in this area.

Question 9: What incentive should be put on TOs in relation to losses?

The carbon impact of losses will be virtually zero by 2030 due to decarbonisation of electricity. Losses are most easily reduced by not connecting remote generation (i.e. renewables). Therefore a losses incentive, beyond any incentive to purchase appropriate low loss equipment (e.g. transformers) will serve no sustainable benefit for the networks of the future.

Question 10: What are the options to avoid any perverse impacts on network development to connect renewable generation?

The market (and associated incentives and disincentives) will determine what generation comes forward to seek connection to the networks. A LCEI will help the companies to find new and innovative ways of meeting market demands which will be primarily for low carbon generation. It does not mean that network companies will discriminate against the connection of fossil fuel generation as the companies have licence conditions to satisfy. In fact, other generation will also benefit from innovations, changes in practice etc. as can be clearly evidenced by Connect and Manage promoted by and for renewables, but which has also benefited significant amounts of fossil fuel generation.

Question 11: Do you agree with the principle of full internalisation of environmental costs? To what extent should the output for SF6 move towards this objective?

Assuming you are excluding the wider environmental impacts of industry GHG emissions, it would seem sensible for TOs to be able to trade off investments in e.g. office insulation and SF6 switchgear replacement taking account of the GHG impacts of both.

Any such incentive must not mean that TOs tend not to use outdoor gear (which uses less SF6) but which may delay planning of new substations compared to the reduced visual impact of using indoor Gas Insulated Switchgear with more SF6.

Chapter 6 Customer satisfaction outputs

We wonder how the views of different customers will be weighted - do all customer's count equally? Or are some more important than others?

We would like to understand who is considered a customer of the TO. E.g. DNO, OFTO, Interconnector, Generator, directly connected User, etc. To what extent is a domestic user who's supply is lost due to a transmission fault a customer of TO?

How are the views of prospective or frustrated customers to be canvassed and weighted - i.e. those customers who would like to connect but have not yet done so or who can't for various network reasons (e.g. planning, costs, timescales, and locations).

Customers can be very reluctant to complain to network companies as they are monopoly businesses and therefore there is no option for the customer to go elsewhere. A third party anonymous process would be needed to ensure such concerns did not obscure the results.

We have no specific responses to the questions except as relevant above.

Question 1: Do you have any views on the primary outputs outlined for customer satisfaction?

Question 2: Are these the appropriate areas to focus on and are there any other areas that should be included?

Question 3: Do you have comments on the proposed approach to setting incentives related to the customer satisfaction outputs?

Question 4: Should the incentives apply to National Grid for good performance as system operator as well as in its transmission operator role?

Chapter 7 Conditions for connection

The proposals suggest incentivising connections but do not give any proposals or outlines as to how this would be achieved. We have some initial thoughts which we would hope are expanded on if this incentive is to be seriously considered.

1. Set a target and incentivise/ penalise with cap and collar for under/over delivery. I.e. set a target of XGW/annum of connections.
 - In setting and measuring XGW/annum have consideration for Generators; Customers with demand and generation / import and export capacities; Connections of OFTOs; Interconnectors; Interconnectors via OFTOs; OFTOs via DNOs; DG and exporting GSPs; etc.;
 - There could be an issue of over incentivisation if generators are connected earlier than they require or are able to utilise;
 - There could be a potential to connect a generator earlier but in a sub optimal way for the generator;
 - Should average or project specific performance be used as a measure?
 - Is the measure a MW or project based incentive?
2. Set and incentivise speedy offer dates e.g. 80 days not 90 days. Savings of 10 days may seem irrelevant if the quality of the offer is compromised or if it forces “easy to offer” connections as opposed to well considered connection schemes designs and locations.
3. Incentivise by offer dates on individual projects: This could result in a perverse incentive to offer late dates so that the target date can be met or bettered.
4. From our perspective we do not see this output measure as in any way equal to our LCEI proposal. The amount of new connections in MW are not tied strongly enough to meeting renewables and then low carbon targets. For example there may be:
 - High levels of connection which does not meet targets (storage plant, flexible generation, or low capacity factor renewables e.g. solar PV – about 15GW has connected in 2 years in Germany alone). There could be connections with high constraints.
 - Or conversely in another scenario low levels of generation which do meet targets, (e.g. biomass fired in existing power stations which don't need any new connections).

Question 1: Do you have any comment on the key principles we have identified for the delivery for connections?

- “for both electricity and gas, TOs need to deliver connections to the timescales set out in existing codes”. The requirements for timescales in existing electricity codes relate only to offers not delivery therefore we would question this as a meaningful primary
- Connect and manage means connections have been brought forward compared to invest and connect. Whatever the regime TOs should be encouraged to connect on time and not to delay.
- Risk of early connection offers (improving 90 days) resulting is “easier to make offers” which may not be the best connection options / designs. However if quality can be maintained offers should be speeded up, provided connectees know when offers will be received in order that they can be ready to respond.
- TransmiT may change charges resulting in changes to the numbers of applications and the locations of those applications but should not fundamentally change the performance requirements of TOs. We might expect their business plans to consider possible outcome scenarios.

Question 2: Do you have any comment on the interactions with the other workstreams, in particular Project TransmiT, for electricity transmission connections?

No

Question 3: Do you have any views on the existing arrangements for gas transmission?

The incentives on TOs to connect gas on time seem be better than for electricity. However electricity usually involves overhead lines which are subject to greater planning uncertainty.

Question 4: Do you consider any specific obligations and /or incentives are required for gas transmission?

No comment.

Chapter 8 Secondary deliverables – electricity transmission wider works

Question 1: Do you agree that there is a need for secondary deliverables that relate to wider reinforcement work on electricity transmission networks?

We don't see any reason to pick out wider works for a selective incentive. They are only one part of the network that requires investment. An incentive on these works may have perverse results in determining how works are classified which may impact on ability to connect. They may be prioritised to the detriment of local or enabling works which could slow connections.

RenewableUK's LCEI would encourage TOs to carry out wider work reinforcements as such wider works would reduce constraints on renewable and low carbon generation outputs.

No additional comments on the questions below

Question 2: Do you agree with our proposed approach to the specification of these secondary deliverables?

Question 3: How should we encourage timely delivery and deal with non-delivery?

Question 4: Have we identified appropriate options for bringing flexibility, over the price control period, to the secondary deliverables that TOs should deliver and to the revenues that they receive for this delivery? Which options work best for consumer interest? How would this depend on the circumstances?

Question 5: Do you agree with our plan to not develop proposals for an asset utilisation incentive scheme (option (d)), and to focus, instead, on the other options?

7) Further engagement

We welcome the opportunity for further engagement with Ofgem and stakeholders to further hone our LCEI proposals into a fully workable set of measures which will operate alongside the company business plans and operate with company benchmarking and customer/ stakeholder feedback to deliver the value for electricity consumers which we have identified.

Yours sincerely,



Guy Nicholson, CEng, MIET, MEI, Head of Grid for RenewableUK

ANNEX - RenewableUK policy paper Initial proposals for RIIO and specifically RIIO-T1: The Low Carbon Economy Incentive (LCEI) Version 1.1