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Dear Angelita,

Consultation on changes to National Grid Electricity Transmission plc's electricity transmission licence to publish the Electricity Ten Year Statement (ETYS) – submission by the John Muir Trust

The John Muir Trust is the leading wild land conservation charity in the United Kingdom. Working with people and communities to conserve, campaign and inspire, the Trust is a membership organisation that seeks to ensure that wild land is protected and enhanced and that wild places are valued by and for everyone.

The UK's wild land is an asset of national and international significance but it is a finite resource. Wild land plays a vital role for carbon storage in trees and peatland, gives us clean air, water and food and is home to valuable wildlife. Wild land also plays a vital role in supporting tourism and a wide range of other economic and leisure activities.

The Trust is committed to policy principles that support the current targets of the UK Government and devolved governments for greenhouse gas emissions reduction, as these are the primary public policy tools directed at climate change mitigation. However, the Trust does not support the construction of industrial-scale wind energy developments on wild land or developments that would impact adversely on wild land and does not believe that it is necessary to allow such development to achieve emissions targets.

Energy infrastructure continues to be the biggest factor causing the loss of wild land, and a huge programme of grid reinforcement is imminent. The Trust is therefore calling for **all** factors to be properly evaluated in cost/benefit analyses of strategic energy schemes, including estimates of their likely material impact on the reduction

of CO2 emissions, and for all possible alternatives to be considered before new infrastructure is permitted on wild land.

We are grateful for the opportunity to respond to this important consultation. Overall we welcome the shift of emphasis in scenario planning to security of supply and affordability, and the more long-term approach to grid infrastructure planning signalled by the ETYS. Our response focuses particularly on **Q5** ('do you have any comments on the type of information provided in the ETYS?')

We note the ETYS will include:

'licensee's best view under each scenario of the development of the National Electricity Transmission System, considering likely capacity, location and timing of the development of onshore and offshore generation and interconnection; likely location of feasible connection points for new offshore transmission; possible routing options for new transmission circuits that might be used to connect generation in offshore waters to the National Electricity Transmission System; licensee's best view under each scenario of the potential reinforcements to the National Electricity Transmission System that may be required to connect onshore and offshore generation and interconnection; licensee's best estimates under each scenario of the costs associated with connecting onshore and offshore generation and interconnection.'

We assume the interconnectors for Scottish island renewables are included in this.

Clearly good market competition is needed to keep prices down and there needs to be a quantity and mix of plant that is likely to meet demand. It follows that it is vital to have reliable estimates of the total cost of electrical energy.

We therefore welcome the requirement for licencees to provide their best estimate of the cost of interconnectors and ongoing grid integration as set out above. However, such estimates will need to be compiled in a consistent way in order provide National Grid and other authorities with meaningful information and to properly inform decision making on strategic energy schemes. It would be helpful to know what factors licencees will be required to provide in their estimates, and whether they will include security of supply and likely CO2 emissions reduction. Such an approach would properly test the economic viability of some of the large scale, remotely sited energy schemes currently envisaged that will be extremely costly both to consumers and the environment.

If you have questions on any of these points please do not hesitate to get in touch. Thank you again for the opportunity to comment on the consultation and we look forward to hearing from you.

Yours sincerely

Sheila Wren