

**WESTERN ISLES TRANSMISSION PROJECT - OFGEM Needs Case
Consultation**

Consultation Response from:

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Question 1: Do you agree that the current network on the Western Isles needs reinforcing in order to connect additional generation?

Absolutely - The Western Isles are an area of significant renewable energy potential, but it currently remains untapped with the current network operating at capacity. This opportunity will continue to be lost unless a larger 600MW link is installed to allow for a variety of community schemes to be connected to the grid – a 450MW link will not alter the current limiting status quo.

Question 2: What are your views on the generation scenarios developed by SHE-T? We are particularly interested in views on the likelihood of wind generation on the Western Isles developing to the levels predicted by SHE-T's scenarios.

We believe the SHE-T scenario's are completely achievable. The Pairc Trust has commissioned a feasibility study (funded by the CARES Innovation fund) looking at the potential for a Pumped Storage Hydro Scheme on the community owned Pairc estate, on the East coast of Lewis. While it has been discussed with the Comhairle planning team with a mid-range generation of 24MW, the feasibility study has already identified alternative options for the scheme to well exceed this – in some cases with generation potential of 105MW according to the technologies and location used.

The community benefit that could arise if any of the scheme options were connected to the grid has the potential to be life-changing for the residents of Pairc – we are a remote rural community facing problems of fuel poverty and social isolation, but we are determined to pursue a community energy project which could bring real lasting socio-economic change to our area.

Question 3: What are your views on SHE-T's approach to optioneering, specifically relating to the routes and link capacities considered, and are there other options that SHE-T could have considered?

We agree that the HVDC link route from Beaulieu to Arnish is the right route to have taken.

Question 4: What are your views on the CBA put forward by the ESO, particularly in relation to the results it produces?

No comments.

Question 5: What are your views on the technical design and costs of the proposed Western Isles link?

We fully support keeping costs down for consumers but the unique conditions of the Western Isles must also be taken into account. Development on Islands is more expensive than on the mainland, but the positive outcomes that can be achieved from currently untapped resources are worth it.

Question 6: What are your views on the following points:

- i. **Do you agree with our minded-to position to reject the 600MW link conditional on only the two Lewis Wind Power projects securing CfDs?**

No, not at all. To support a 450MW link instead of the 600MW would hugely disadvantage community led projects such as ours, which is contrary to key government policy aims. It is short sighted and does not acknowledge the very real opportunities being discovered here in the Western Isles for transformative socio-economic benefits and for the government to meet key carbon reduction targets and grow decentralised energy.

- ii. **What are your views on our analysis of the information, which suggests a 450MW link would represent the best outcome for existing and future consumers if only the two LWP projects secure CfDs?**

Again, this is a short-sighted strategy as the potential for renewables energy generation on the islands is huge and would not be limited to the two LWP projects. It does nothing to consider the best outcome for consumer's environmental concerns and only considers the immediate financial bottom line – which in itself only delays further inevitable expense to the consumer later on.

- iii. **Do you consider that consumers could be appropriately protected from the costs of funding a potentially significantly oversized link if we were to approve the needs case for a 600MW link? If so, how could this be achieved?**

Firstly we do not believe that the 600MW link is oversized bearing in mind the confidence and support that community trusts on the islands have in pursuing energy developments. Otherwise - Yes, consumers can be protected and we believe that measures outlined by SHE-T to underwrite any additional costs offer that perfect opportunity. They have demonstrated their belief that a 600MW link is justified and are willing to bridge the cost differential.