Dear Mr Norman

Please find below my contribution to your consultation on the Western Isles Transmission Project Final Needs Case Consultation.

Please confirm receipt of this email.

Best
Angus

Angus B MacNeil MP
Na h-Eileanan an Iar

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

Yes – there is a lack of capacity on the current network for additional generation and so new infrastructure is essential for the development of renewables in the Western Isles.
There are projects ready to go and there are many more in the planning stages which require the interconnector to go ahead.

Approval of a 450MW link means it is unlikely that projects will go ahead.

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.

I think the generation scenarios developed by SHE-T are realistic and based on a huge amount of engagement and discussion with developers and local agencies here in the Western Isles.

There are firm plans already in place with the relevant consents and grid connections and others in the pipeline. With another CfD allocation planned for 2021, the go ahead for the interconnector infrastructure will give confidence for developers which has been lacking.

The lack of firm plans for the interconnector and, until recently, doubt over the inclusion of Remote Island Wind in the CfD auction, may have affected confidence of developers.

Overcoming those hurdles will undoubtedly bring more plans to the Western Isles which are the best wind resource in Europe.
Ofgem state in the consultation there is a risk that progressing with a 600MW link risk consumers paying for a 'significantly underutilised link'. I think this is extremely unlikely with the industry and the all local agencies in the Western Isles stating the opposite.

In addition, Ofgem have, in correspondence with me, stated that the 450MW link to the Western Isles would add around 39 pence per household for 45 years to the average consumers' annual bill. The 600MW link would add a further 4 pence to this.
All energy consumers pay for the cost of investment in new capacity and the regulator ensures it obtains the best deal possible for them. The best possible deal for consumers is that the additional 4p would achieve so much more in economic and environmental benefit.

The risk for Ofgem is that backing the 450MW option, they risk preventing significant wind generation

in the Western Isles and does risk being in the situation of consumers having to pay for an additional cable in the future to connect that generation.

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?

I have confidence in the methods used by SHE-T and that they have spent many years working on all the possibilities in terms of routes and link capacities. The 600MW link has been concluded by all as the best option in terms of its capacity, location and construction date.

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 I do not agree with this position.

There is still massive potential and interest in moving forward other projects. If you build it, they will come.
In addition the next CfD allocation in 2021 will allow for more future development. There is also the option that projects could still progress down a different route from the CfD path.

It is exceptional value for money that for just 5% extra costs, you will get more than a third more capacity for the cleanest source of energy to tackle global warming.

The 450MW permission means nothing will go ahead and therefore no effort is made to reduce grams of carbon per megawatt that will have been made in UK's electricity production.

Current grams per kilowatt hour are double what the target should be in a few years time.

ii. 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?

The 450MW option would mean nothing goes ahead and reduce scope for further extension.
If the UK is serious about dropping its carbon levels in electricity production then having good connections to the best wind resource in Europe is key.

iii. 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?

Additional capacity on the network could lead to lower prices for consumers and so approving the 600MW link is the best way to ensure the best possible deal for consumers.

The costs provided to me by Ofgem state that the 450MW option would add 39p to annual bills and the 600MW would add 43p. That small additional cost would bring massive economic development and opportunity for additional generation to an area which has the best wind resource in Europe.

The focus by Ofgem on consumers isn't really a focus on consumers at all but a focus on consumers' bills.
What is best of consumers is not to live in a warming up planet or with increased pollution from electricity production.

What is best for consumers is to be able to live sustainably and Ofgem needs to take into account of the holistic need of the consumer. Even without that approach, the 4p extra annually is not a significant sum.

Angus B MacNeil MP
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