07/06/2020

James Norman,
Head of New Transmission Investment,
Ofgem.

Dear Mr Norman,

Shetland Transmission Link Second Consultation.

I write as a concerned individual and ……..to express my concerns and objections to the proposed transmission link and the ramifications such a scheme will have on the quality of life, energy costs and general amenity this enabling technology will have on myself and many other concerned locals on these islands.

The proposed interconnector will enable the development of several large industrial windfarm projects, taking up over 20% of the Shetland Islands landmass having been granted planning consent by the Scottish government. These developments threaten the bio-diversity, social cohesion, human and animal health and will permanently alter a globally important carbon sink by ripping up viable carbon sequestering peatlands, against the government's own climate crisis policies. The projects were rejected for subsidy in the recent CfD auctions but the local council and main developer Scottish & Southern Energy are determined to plough ahead despite huge local opposition, which has never been properly consulted. The 25 year lifespan of these projects is at best short-sighted and at worst environmentally devastating.

Of particular concern both as an individual and to voice that of any local people with whom I have spoken, is the issue of extreme fuel poverty (these islands have one of the worst records in the UK) and how the huge cost of these developments will push up energy prices to an ever more unsustainable level, while contributing negatively to UK grid stability, and certainly adding a large risk factor for Shetland consumers, with cable breakage, damage and maintenance, all with known precedence.

I understand that is part of the OFGEM brief to protect consumer interests and on the above point alone, this scheme will have an extremely adverse effect on the cost of living here in Shetland, which is already the highest in the UK, and in the wider community. In these uncertain economic times such a project is, in my opinion foolhardy and speculative and could adversely affect many important local industries such as aquaculture and tourism with attendant consequences on employment, depopulation and bio-diversity.

I would therefore urge you, in your deliberations, to consider the alternative proposal, recently mooted for an island only LNG solution by Danish power station specialist BWSC at a fraction of the cost, substantially reducing carbon emissions and enabling lower carbon freight and passenger ship and ferry propulsion.

Question 1: *What are your views on the generation scenarios developed and updated by SHE-T? We*
are particularly interested in views on the likelihood of wind generation on the Shetland Isles developing to the levels predicted by SHE-T's scenarios and any further changes or updates since
SHE-T's October 2018 Final Needs Case submission that you think should also be considered.

With the exception of Viking Energy, no meaningful investigations have been undertaken. Local knowledge tells us that in several areas where these projects are to be sited there are areas of extremely deep peat deposits requiring massive excavation further exacerbating carbon release and invasive infrastructure.
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Question 2: *What are your views on the demand sensitivity explored by SHE-T?*

I think that the signalling by the Oil and Gas Industry to use renewable energy to meet the manufacturing need is simply a PR exercise to "green" their manufacturing credential. With the fall in oil based prices globally due to Covid-19 it is unlikely that these huge players will ultimately go down this route, at least till there is a significant upturn in demand for their products.

Question 3: *What are your views on the link options considered by SHE-T? We are also interested in*
views on the options proposed by SHE-T to mitigate against the risks of a second link being needed.

The proposed link is simply a vehicle to enhance SSE's shareholder offering by tapping into the lucrative constraint payment system and other such subsidy. This link will be vulnerable to disruption from a plethora of causes, natural and otherwise and therefor to ensure robust redundancy a 2nd link would be essential, again at huge cost to the consumer.

Question 4: *What are your views on the technical design and costs of the proposed Shetland link?*

See Above.

Question 5: *What are your views on the CBA put forward by the ESO?*

I did not understand the contents of this paper, it having been redacted beyond my comprehension, therefore I cannot, as a lay person comment on it. Suffice it to say however, that in my experience in business, capital costs of any business always increase exponentially once the project has started. Just look at HS2 and the Channel Tunnel. Given the almost certain need for on-island backup and a second cable the project is ludicrous when a perfectly viable alternative is on the table. (see covering note)

Question 6: *What are your views on other approaches we have taken to assess the costs and benefits to GB consumers?*

I fail to see how such a capital intensive project with such a limited operational lifespan could represent value for money to the UK consumer and taxpayer who will ultimately be footing the bill, whether or not power is generated by these windfarms. It is corporate shareholders who will benefit and indeed, this is the whole premise on which this scheme has been developed.

Question 7: *What are your views on our minded-to position to conditionally approve the revised*
Final Needs Case? Specifically:
i) Do you agree with our proposal to approve a 600MW link subject to Ofgem being satisfied, by the end of 2020, that Viking Energy Wind Farm is likely to go ahead?

I believe this proposal is wrong for the reasons stated above, will be detrimental to our economy and should not proceed.

ii) Do you have any views on the type of evidence we should expect to see that would confirm that Viking
Energy Wind Farm is likely to go ahead?

Given the uncertainty during these times and into the foreseeable future it is highly unlikely that investors will have the confidence to underwrite the huge costs of this project, particularly as the final estimated cost will be cast into doubt.

iii) Do you agree with the factors we have considered to reach our minded-to position?

Further work needs to be done by your department in the light of present circumstances, which, in my opinion change everything and will require further scrutiny and re- assessment.

iv) Are there any other factors that you consider we should take into account when assessing this proposal

In the quest for a net-zero carbon energy future, onshore wind power is only one (albeit well tried throughout history) form of renewable generating potential. It is my view that the money saved by NOT consenting this proposal could be better diverted to developing further offshore wind and emerging technologies which will be of far greater potential benefit toward this aim.

Question 8: *Do you agree with the findings of our analysis?*
I do not believe that your analysis properly considers alternative proposals and more work needs to be done.

Question 9: *Are there any additional factors that we should consider as part of our analysis and/or*
decision on whether to apply the CPM for the Shetland transmission project?

I cannot comment on this as I do not have the requisite technical knowledge.

In conclusion I would like to state that, as a concerned citizen of the UK, I believe that as a country and resident of a fragile Island community we simply cannot afford the lucrative subsidies and payments being exploited by wealthy Renewable Energy companies for inefficient and intermittent production of electricity.

Signed