

28th March 2023

F.A.O. Lina Apostoli ,  
Heavy Scrutiny Projects,  
Ofgem.

Dear Ms Apostoli,

Having already experienced some of these Ofgem "consultations" in regard to the Shetland inter-connector cable I welcome the opportunity to comment on the plans for Orkney.

This consultation would appear to be even more of a foregone conclusion than the Shetland one. There is even a suggestion to fast track approval in some areas; such is the enthusiasm for all things "renewable" and there would again appear to be a desire to be supportive of the ambitions of a major energy company, SSE.

In common with the Shetland inter-connector, there seems to have been no proper cost benefit analysis published of all the implications of this approval. In Shetland we are continually seeing expensive add-ons to the original proposal in order for the system to work properly. It would appear that Ofgem's remit now is to ensure that renewable energy takes precedence over any cost considerations for consumers. It is quite staggering to see that the cost of the inter-connector to Orkney is now estimated to be £371 million. Ultimately this cost will be borne by energy consumers and, together with add-ons, will represent a cost of approximately £2 million per megawatt before any windfarm construction expenses.

SSEN's recent record in installing cables is also open to question. It has recently been revealed that the new £30 million Pentland East subsea cable, that failed soon after being commissioned in 2019, is not likely to be repaired. There have also been issues with cabling for the Viking Energy windfarm on Shetland, currently under construction, with the selected cabling failing tests and having to be replaced.

It seems doubtful that the full transmission grid implications of approval of this inter-connector have been considered. Can the grid further South on mainland Scotland handle yet more power from further North? There has been much publicity about constraint payments when power from wind farms cannot be utilised because grid capacity is limited. Will approval of the Orkney inter-connector simply add to the constraint problem, unless a full scale grid improvement is undertaken nationwide?

It is my opinion that there are too many unanswered questions about the need for this inter-connector and the alleged benefits that it will bring for consumers. The main impact for consumers is likely to be increased energy bills and questionable energy security due to cable vulnerability and the inherent weaknesses of wind power as a major energy source..

I hope that you will take my views into consideration when making a final decision on this proposal.

Yours faithfully,