

Jon Sharvill, Head of ET Investment Strategy

Dear Mr Sharvill,

Re: Consultation on the proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

I am writing to comment on this short-period consultation, which came to me via a community group, and which is clearly aimed at industry and commercial stakeholders rather than the consumers and residents who will be impacted by these hasty and aggressive proposals. I cannot answer anything other than 'No' to each of your page of consultation questions, and write instead to explain why not.

For your information, I live in Suffolk and within a few miles of the proposed Sizewell C development and the National Grid's current glut of apparently uncoordinated and free-of-impact connection and conversion programmes, mainly around Friston and Saxmundham. We are used to our feedback being ignored or brushed aside down here, so my aspirations for this letter are not ambitious. However.

1 I am pleased to note that on the first page of your consultation document you say - "*We would like views from people with an interest in development of the electricity transmission network and Net Zero. We particularly welcome responses from the electricity transmission owners and the ESO and we also welcome responses from consumer groups, other stakeholders and the public.*"

The consultation is on relatively technical aspects of the financial regime that will govern projects designed to deliver by 2030, so it is superficially reasonable to put the industry at the top of the list. The impacts of the actions of those particular stakeholders will be felt by others, however, and I don't think your processes pass the Gunning Principles tests – we the consumers are entitled to a consultation which provides *available, accessible and intelligible information* so that we may make *an informed response*; and we are entitled to *adequate time for consideration and response*. If you write down that, under your principles, you welcome responses from a certain group, but then make it as difficult as possible for that group to respond, then your consultation is not effective and cannot be taken as evidence for one conclusion or another.

2 The proposals themselves are part of an apparently frantic and unnecessarily risky search for mechanisms to 'deliver' a zero carbon electricity industry by 2030 (*Clean Power 2030*). It is quite clear that this political target is not achievable, and Ofgem have stated that there is considerable uncertainty about what a CleanPower20230 network would consist of, and the strategic and practical actions required to deliver it. But, as I understand it, Ofgem have *also* said that a considerable proportion of the ESO's proposals in its transitional Centralised Strategic Network Plan (tCSNP2) are so likely to be part of the final proposals for Net Zero by 2050, that Ofgem should support action to accelerate financial support for these elements of the plan. This is irrational. Accelerating upgrade investments that will have a permanent effect on communities, ecologies and environments *certain* to be heavily impacted, on the grounds that the upgrades are *likely* to form part of a programme that is yet to be written down, consulted upon and approved is startlingly dictatorial.

3 I have not been given the time to track through your consultation document (and the substantial references) a line of argument that would allow me to foresee its potential impact in my area. Without a complete and coherent national Strategic Spatial Energy Plan, it would very likely be impossible to do that with any certainty, which makes it all the more irrational to accelerate progress towards undefined capacity and resource targets – let alone future consumer behaviour and technical progress.

4 My simple point is this – there is a generational transition in progress that needs to be carefully planned, and consulted upon whole-heartedly by politicians, their statutory agents and the energy industry. The impacts of the transition at a local level will be very severe in some cases, both for landscapes and ecologies and for human settlements and lives. These impacts must be justifiable, and openly so, if the process is to meet the standards of civil society. So far, here in Suffolk, our experience has been all otherwise; programmes are developed far along the path to option selection before any consultation takes place; feedback from communities and their representatives is ‘considered’ but never applied; the timing of consultations seems oddly linked to holiday periods and overlaps with similar projects, putting councils and action groups at all levels under impossible time constraints; and the deferral of honest and detailed impact appraisal, either straightforwardly or through factitious methodologies, has become an industry. This is not surprising - paragraph 3.29 of your consultation document mentions the risks of locking in *“designs that have not been thoroughly tested and may not be the optimal option. In the worst case, this could lead to excessive costs, poor routing choices, and poor design choices for the network.”* This is not a risk in Suffolk, it is already a reality.

With the downstream pressure of (say) Lionlink, Sealink, SPR’s EA1N and EA2, Nautilus and SZC proposals and planning on local councillors’ and politicians’ desks here, I guess that responses to your request for consultation responses within 30 days will not be numerous. We will try harder when you give us a better opportunity than you have on this occasion.