

From:

Sent on: Saturday, August 31, 2024 4:14:40 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

CC:

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

To: Jon Sharvill, OFGEM Head of ET Investment
Strategy RIIOElectricityTransmission@ofgem.gov.uk

Date: 24 August 2024

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects.)

I am writing to OBJECT and call on OFGEM to pause and withdraw this consultation for the following reasons:

1) Its failure to conduct truly public widespread consultation both on this proposal; a thirty days online only consultation timeline is unacceptable (although the deadline is now extended). OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when public were ill-informed and uninvolved. The only online consultation disadvantages people who do not use the internet like my partner because of his age and infirmity and this breaches Equal Opportunities and lacks inclusivity of all people in the community.

OFGEM has a priority duty to protect energy consumers.

OFGEM must not enable this nor the ASTI framework and allow public funds to be spent in ways which are unaccountable and unacceptable by the public.

2) As a priority, ahead of this consultation, OFGEM MUST revisit and reconsider its Advanced Strategic Transmission Investment (ASTI) funding framework as this protects transmission companies from investment risk, giving them monopoly status while removing the benefits for the consumers.

3) Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (National Grid, SSE and Scottish Power etc). No consideration is given to environmental, landscape, community or health impacts.

ASTI status means the consumer/electricity bill payers will pay for the construction regardless of final cost. Inflation is not taken into account. Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the Transmission Owners themselves. OFGEM has given these companies a blank cheque.

If Transmission Owners deliver their projects by 2030 , OFGEM allows them to claim full cost – they name their own price on their own project, built their own way and free from competition.

ASTI was brought out by OFGEM without it ever being discussed properly in Parliament or in any other public debate.

The current set up tips infavour of the Transmission Owners and shareholders, the public and consumers are gravely disadvantaged.

OFGEM needs to undertake its responsibility to the British public, so that the rights and welfare of ordinary citizens are not compromised by easy and quick arrangements with Transmission Owners.

Public spending must conform to requirements of HM Treasury's GREEN BOOK rules which say public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to many of these requirements.

It is important that OFGEM upholds the greater interest of the public including those who do not have access to the internet, they have a moral and ethical responsibility to the British public.

Yours Sincerely,

From:

Sent on: Friday, August 30, 2024 8:47:56 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

To: Jon Sharvill, OFGEM Head of ET Investment Strategy

I write this email OBJECTING to **funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects** and calling on OFGEM to withdraw/pause this consultation as premature for reasons of:

- its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware.

- **OFGEM has a priority duty to protect energy consumers, so OFGEM must NOT enable this nor the ASTI framework, NOR ever allow public funds to be spent writing blank cheques to shareholder-owned, profit-focused transmission companies to pay for projects that these companies scheme up & set their own price on in the first place.**

- As a priority, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework which it approved previously that protects share-holder own transmission companies from investment risk and gives them monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them.

- MY further reasons are:

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION given to environmental, landscape, community or health impacts.

ASTI status means consumer electricity bill payers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't factor inflation and the cost has already shot up! Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. I think it is appalling that OFGEM has essentially given these companies a blank cheque.

If TO's deliver their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way -free from competition. If another provider company shows how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by OFGEM without it ever being discussed properly in Parliament or in any other public debate. It was mentioned once in Hansard, out of context in a minor debate. The 2023 so-called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it a brilliant idea. They've repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening. I

IN the real world private, profit -focussed companies BID/ compete to build infrastructure, - they have to take a risk. They need to raise capital, take the risk that they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government expecting consumers to pay whatever! The TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!

Public spending must conform to the requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been

reduced as much as possible and the spending should provide a benefit to the UK population. ASTI does not conform to many of those requirements.

These plans are a disgrace, and funding them with public money is absurd. We've had the infected blood scandal, the post office scandal, will this be the next great injustice to cause irreparable damage to the landscape of Britain and the lives of 100s of thousands of British Citizens now and for decades to come.

Sincerely,

From:

Sent on: Friday, August 30, 2024 8:44:35 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

To: Jon Sharvill, OFGEM Head of ET Investment Strategy

I write this email OBJECTING to **funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects** and calling on OFGEM to withdraw/pause this consultation as premature for reasons of:

- its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware.

- OFGEM has a priority duty to protect energy consumers, so OFGEM must NOT enable this nor the ASTI framework, NOR ever allow public funds to be spent writing blank cheques to shareholder-owned, profit-focused transmission companies to pay for projects that these companies scheme up & set their own price on in the first place.

- As a priority, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework which it approved previously that protects share-holder own transmission companies from investment risk and gives them monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them.

- MY further reasons are:

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION given to environmental, landscape, community or health impacts.

ASTI status means consumer electricity bill payers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't factor inflation and the cost has already shot up! Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. I think it is appalling that OFGEM has essentially given these companies a blank cheque.

If TO's deliver their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way -free from competition. If another provider company shows how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by OFGEM without it ever being discussed properly in Parliament or in any other public debate. It was mentioned once in Hansard, out of context in a minor debate. The 2023 so-called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it a brilliant idea. They've repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening. I

IN the real world private, profit -focussed companies BID/ compete to build infrastructure, - they have to take a risk. They need to raise capital, take the risk that they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government expecting consumers to pay whatever! The TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!

Public spending must conform to the requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide a benefit to the UK population. ASTI does not conform to many of those requirements.

How these plans can be allowed to proceed in a fair democracy, which puts not only the environment but the public purse first, is beyond me

Sincerely,

From:

Sent on: Friday, August 30, 2024 6:53:23 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed Regulatory Funding

To Jon Sharvill, OFGEM Head of ET Investment Strategy

RIIOElectricityTransmission@ofgem.gov.uk

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects.)

I write this OBJECTING and calling on Ofgem to withdraw/pause this consultation as premature for reasons of:

- its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware.
- OFGEM has a priority duty to protect energy consumers as so OFGEM must NOT enable this nor the ASTI framework NOR ever allow public funds to be spent writing blank cheques to shareholder-owned, profit-focused transmission companies to pay for projects that these companies scheme up & set their own price on in the first place.
- As a priority, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects shareholder own transmission companies from investment risk and gives the monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them.
- MY further reasons are:

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION given to environmental, landscape, community or health impacts.

ASTI status means consumer electricity bill payers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't take factor inflation and has already shot up! . Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects.

The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque.

If TO's deliver their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way -free from competition. If another provider company shows how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by OFGEM without it ever being discussed properly in Parliament or in any other public debate. It was mentioned once in Hansard, out of context in a minor debate. The 2023 so-called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it a brilliant idea. They've repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening.

In the real world private, profit -focussed companies BID/ compete to build infrastructure, - they have to take a risk. They need to raise capital, take risk they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government expecting consumers to pay whatever!

The shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!

Public spending must conform to requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population.

ASTI does not conform to a bunch of those requirements.

For more info go to Consultations page on Ofgem's website & sort by publication date 1st August 2024 Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

<https://www.ofgem.gov.uk/consultation/proposed-regulatory-funding-and-approval-framework-onshore-transitional-centralised-strategic-network-plan-2-projects>

From:

Sent on: Friday, August 30, 2024 6:33:04 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: FAO Jon Sharvill

Dear Mr Sharvill

My husband and I are very severely impacted by the proposed Norwich to Tilbury project. We have been expressing our concerns around National Grid's process around this project since we first became aware of it in April 2022. We have suffered immeasurably through this process and support the concept that TO processes for project planning and development must improve and be capable of identifying and developing the optimal solution which will seriously seek to minimise the impact on individuals, communities, wildlife and the environment.

National Grid's processes for the N2T project has raised very serious concerns about transparency, methodology, costings and consultation deficiencies. Concerns raised by stakeholders, including community groups about the work carried out by National Grid Electricity Transmission (NGET) with respect to the Norwich to Tilbury project have been ignored. NGET's costings are not transparent so it is not possible to make true comparisons of alternatives, they are also incomplete and unrealistic. Very significant costs have not been included in the N2T project costings including compensation to landowners and farmers, community benefits, any individual's compensation and biodiversity net gain. Not only could these add many hundreds of millions of pounds to the overhead lines cost, but these are not applicable offshore at all, and community benefits are substantially lower for underground options. The proposed contingency is totally unrealistic for such a large infrastructure project.

We welcome consideration of alternatives not in the Centralises Network Plan 2 (CSNP2). Some alternatives could address network needs and we welcome Ofgem's intention to help support TO's to explore whether these can be delivered at lower cost and/or greater speed. There are alternatives to N2T that could meet those criteria. The current proposal is highly destructive to individuals, communities and the environment, both in delivery and the end result. We therefore welcome the proposed flexibility to enable alternatives to be properly explored and we look to see this implemented in East Anglia at the earliest opportunity.

The current proposal will be a social, environmental and economic disaster. The short and long term damage that this will inflict is not justifiable.

Yours sincerely.

From:

Sent on: Friday, August 30, 2024 11:12:49 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Opposition

30th August 2024

Please accept this simple email as the expression of my opposition to the Kintore to Tealing project.

I do not know how group members of STIG can create the time (at their own expense) to marshal all the information that they provide to the rest of us.

I personally feel overwhelmed by the mighty juggernaut that is foisting this project on our country and feel for everyone living in areas that are to be similarly blighted.

Not enough care or preparation has gone into the decision-making process. Public opinion is receiving short shrift. Ofgem's approach to this important matter has to be challenged, and I urge Jon Sharvill of Ofgem to look carefully into the BEST interests of all concerned.

Thank you.

From:**Sent on:** Friday, August 30, 2024 11:03:46 AM**To:** RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>**Subject:** Consultation response.

Dear Sir/Madam

This is a narrative response to your consultation on proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects. But this is not a "General Feedback" (1.19) response regarding the overall process by which you conduct the consultation.

The UK does not have land features suitable to allow construction of sufficient hydro generation or pump storage which would render feasible any UK grid-connected intermittent generation (eg. wind or photovoltaic) at all in order to reach net zero. Nor would international interconnectors or electricity storage render feasible any UK grid-connected intermittent generation at all for that same purpose. In order to reach net zero, the UK therefore should have no grid-connected wind or photovoltaic generation at all. Essays at www.350.me.uk explain this more fully.

This concludes my response to the consultation. I do not request any confidentiality.

Yours sincerely,

From:**Sent on:** Friday, August 30, 2024 9:57:13 AM**To:** RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>**Subject:** Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

To Jon Sharvill, OFGEM Head of ET Investment Strategy

I write with regard to this consultation and to register my objection and call on OFGEM to withdraw or pause this consultation for the following reasons:

Its failure to conduct truly public widespread consultation - 30 days online only is unacceptable. OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware that a consultation was taking place.

OFGEM has a duty to protect energy consumers so it is unacceptable for OFGEM to enable this or the ASTI framework or ever allow public funds to be spent writing blank cheques to shareholder owned, profit-focused transmission companies to pay for projects that these companies set their own price on in the first place.

As a priority, OFGEM must revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework. This framework protects share-holder owned transmission companies from investment risk and gives them monopoly status, removing the benefits for the consumer of companies being required to compete in better ways of working and pricing thereby removing competition.

OFGEM applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemes by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) but no consideration was given to environmental, landscape, community or health impacts.

ASTI status means electricity bill payers / tax payers will pay for the construction regardless of final cost. This figure was estimated at £20 billion but didn't take into account inflation and these costs have already shot up. Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque.

If TO's delivers their projects by 2030, OFGEM allow them to claim full cost – they name their own price on their own project built their own way, free from competition. If another provider company were to show how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by Ofgem without it ever being discussed properly in Parliament or in any other public debate. It has been mentioned once in Hansard, out of context in a minor debate. The 2023 so called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it was a brilliant idea. That formula has been repeated with this consultation, 30 days of response window and nobody knowing what was happening.

In the real world private, profit focussed companies have to bid/compete to build infrastructure. They have to take a risk. They need to raise capital and take the risk that they will make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything

is underwritten by OFGEM & UK government expecting consumers to pay whatever the final bill may be. The TO shareholders have a guaranteed profit. OFGEM will just put the cost of these projects onto the bills of everyone paying for their electricity.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then. They are planning on using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay regardless.

Public spending must conform to requirements of HM Treasury's Green Book rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to most of those requirements.

I therefore call on OFGEM to widen this consultation to ensure that the bill payers throughout the country who are expected to pay for ASTI funding are given a chance to have their say.

From:

Sent on: Friday, August 30, 2024 9:00:18 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

I can't help thinking that all of your "consultations" are designed for people in the engineering, legal or corporate world and not for the likes of me, a retired registered nurse living in a beautiful part of rural Wales, just a few miles from the proposed sites for more so-called wind farms. The size of the document, the legalese and the short time frame from publication to closing date leads me to believe that you are actively discouraging dialogue.

I do, however, have a view on wind farms, no matter where they are; I am not a NIMBY more of a NIABY as I don't want to see wind farms in anyone backyard.

I'm no scientist but I am able to understand English and to me, needing 12-14 years for projects to go from conception to commission while somehow supporting CP2030, suggests that everything is already underway and this is a mere paper exercise.

Everyone is ignoring the fact that Britain has horrendously high energy price and while people may support the idea of more green energy in principle, the cost to the individual is too great.

A brake must be put on these plans.

From:

Sent on: Thursday, August 29, 2024 2:15:44 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: SSEN Beaulieu to Peterhead Powerline and associated infrastructure

Jon Sharvill, OFGEM Head of ET Investment Strategy

Dear Mr Sharvill

I am horrified at the way SSEN is proceeding with this project. I have been to several SSEN "consultation events", at which very little information has been given and little notice apparently taken of the serious concerns expressed by almost all those attending. A line of tall and very visible pylons will be constructed across good agricultural land, certainly in Aberdeenshire where I live. Even more worryingly large substations will be built, together with associated battery stores. Numerous offshore windfarm companies are being directed to feed into this network with their own substations and, mainly subsoil, cable connections. This again will result in the loss or serious degradation of agricultural land. Such information as is available has been drip fed and no one seems to have a clear idea of what anyone else is doing.

People living in the North East of Scotland are greatly concerned by what they see as the industrialisation of their countryside and by the lack of benefit that they are likely to receive in return. Much of the power generated both onshore and offshore will ultimately be transmitted subsea from Peterhead, and other points on the East Coast of Scotland, down to England. There is a strong case to be made for putting much more of the transmission offshore. This is not a rant against the development of renewable energy but a request that people directly affected by its development should be properly consulted and compensated for the intrusion and losses it will inflict. In Scotland we already pay some of the highest prices for our electricity.

As I understand it, OFGEM has a legal duty to uphold consumers' interests. This covers the regulatory approval and funding framework for onshore electricity transition projects. It seems that the ASTI funding framework, which was approved with minimal public consultation, protects the investment costs incurred by privately owned transmission companies at the expense of consumers and taxpayers. Of course consumers and taxpayers will ultimately have to pick up the tab but OFCOM should be there to protect the interests of consumers and ensure that HM Treasury rules that public money should be spent carefully are followed.

Your help with this would be much appreciated

Yours sincerely

From:

Sent on: Thursday, August 29, 2024 10:46:16 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Feedback on Consultation on the proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network

Jon Sharvill, Head of ET Investment Strategy

Team: Major Projects

I believe the accelerated target for a zero carbon electricity system by 2030 (also known as Clean Power 2030 or CPP2030), introduces unnecessary risks for energy security, the environment and the economy for the sake of political expedience and virtue signalling. To achieve CPP2030, the government asked the ESO to advise on the location and type of new investment and infrastructure needed to deliver this target. Ofgem have stated that considerable uncertainty remains about what an electricity network needed to support CPP2030 will look like, and the actions required for achieving this. However, Ofgem also state that despite this uncertainty, they are confident that a “significant proportion” of the transmission network upgrades recommended by the ESO in its tCSNP2 will play an integral role in meeting Net Zero by 2050 and will therefore be required to be delivered anyway. This is contradictory and not rational, especially in the context of accelerating the spending of £billions and damaging the landscape forever. Also, much of this is predicated on technologies, markets and anticipated consumer behaviour which are hard to predict with any degree of confidence. The undue haste in accelerating decarbonising of electricity generation eliminates a 5 year period which could have otherwise been used for more cautious and measured assessments of energy planning and longer term grid design. Also, accelerated funding plans are not based around a sufficiently complete Strategic Spatial Energy Plan (SSEP). The mix and locations of generation, storage and transmission depends largely on the SSEP which in turn provides the basis of a UK Centralised Strategic Network Plan (CSNP). Whilst the SSEP and CSNP aren't strictly sequential and can be developed and refined iteratively, there are key elements missing from the SSEP/CSNP.

- No mention is made for the continuation of the existing fleet of gas powered generation which will certainly be required as backup during periods of wind drought.
- No consideration is given for the opening up of generation in mainland England which should reduce the need for generation and transmission through Scotland
- The tCSNP2 is predicated on grid scaling of hydrogen and carbon capture which is impossible to realise before 2030.
- The 2030 Clean Power Plan (“CPP2030”) promoted by Ofgem is impossible to achieve because there will be insufficient storage in 2030. A 2 week wind drought in winter requires several hundred times the 2030 that ESO forecast for storage.
- Ofgem refer to the ESO’s HND and “Beyond 2030” report as "Transitional Centralised Strategic Network Plans” or (tCSNP2). These provide an analysis of such widely varying pathways, each with profoundly varying impacts on network design and cost that they cannot be considered as plans.
- There is no mention of the impact of ever increasing constraint payments associated with capturing even larger volumes of wind power. It is totally impossible to have in place by 2030 a level of storage capable of absorbing excess supply beyond demand.

- There is no discussion around the impact of REMA on network design and funding. This could have a profound impact on the energy mix, infrastructure and phasing of what is built and where.
- There is no reasonable correlation to UK Government Greenbook guidelines. Almost every guideline has been ignored.

Despite the enormous sums being committed in a very liberal manner to the acceleration program, there is no mention of accelerating funding for compulsory purchase or compensation for severely impacted properties. This is a key issue that just hasn't been addressed. If Ofgem were more proactive in providing assurances to property owners that they will be treated fairly, much of the growing unrest and protest, that I am sure you're aware of, would dissolve. Most property owners will be impacted in a very minimal way by new infrastructure in that their landscape views may be changed with very little impact on their way of life or property values. Where these owners complain, they can quite rightly be described as "nimbies". However, at the other end of the spectrum, where property owners have remote houses or tourism related businesses and where much of the value of their properties and their way of life is based on their location and amenity value, then placement of new infrastructure, in close proximity, or just the threat of this, will have a serious impact.

From:

Sent on: Thursday, August 29, 2024 10:24:43 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

I am writing to OBJECT to this and calling on OfGEM to withdraw or pause this premature consultation.

- Having an online only consultation for 30 days does not constitute a proper consultation. The outcomes of this policy have environmental implications. The UK has international obligations to adhere to the UN Aarhus Convention. OfGEM fails to comply with all 3 Pillars, and repeats the same errors of the 2023 consultation. Better and wider public consultation is required before OfGEM reaches a decision. For instance how many public libraries have hard copies of this consultation? Such lack of adherence by OfGEM could lead to an appeal to the UN in non-compliance.
- OFGEM has a priority duty to protect energy consumers. Allowing private companies whose revenue comes from consumers a carte-blanche without considering all the implications for the consumer is a failure of this duty.
- OFGEM MUST reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects share-holder own transmission

companies from investment risk and gives them monopoly status. For the benefits for the consumer, companies should be required to compete in better ways, something that OfGEM fails to address by supporting monopolies in the transmission network.

- OfGEM has failed to consider the environmental, landscape community and health aspects of their proposals. In light of a recent Supreme Court judgment failure to consult and consider the environmental implications of any proposals could be illegal and open up OfGEM to legal challenge. Proper consideration of ALL the environmental implications is mandatory and OfGEM have failed in this regard.
- Electricity consumers under the current proposals are due to pay the FULL cost of these proposals isolating monopoly Transmission Owners [TO] (private companies) from risk. This is a derogation duty by OfGEM who are required to protect energy consumers. This could be done by breaking the monopoly in the TO's and allowing companies to compete in building this infrastructure in any area. This could be done by a bidding process for instance.
- OfGEM must focus on getting consumers the best value for money. Allowing monopoly TO's to decide the price gives private companies a blank cheque. OfGEM needs to remedy this. Effectively OfGEM is asking the public to fund these proposals and need to be careful what they are proposing is complying with HM Treasury's rules that public money should be spent carefully, legally, openly and with evidence that the risk has been reduced as much as possible. OfGEM has failed with every count of these Rules.

From:

Sent on: Thursday, August 29, 2024 9:20:49 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

Jon Sharvil, Ofgem Head of ET Investment Strategy

29/8/2024

Consultation process.

It is only by joining a local group opposed to SSEN's transmission project that I have become aware of this "consultation process" at all. Surely if Ofgem was really intent on consulting with the public it would have made certain that most people were aware their views were being sought. Even so a 30 day window to gather these views seems very short almost a paper exercise rather than a real search for reactions.

As I understand it Ofgem has a duty to energy consumers to protest them & prevent public funding to be spent unwisely on projects which energy companies could fund themselves. It would seem that through the ASTI funding framework approved last year energy companies are protected from investment risk & given monopoly status thereby removing competition. This is hardly in the interests of the consumer.

What consideration has been given to the environmental, landscaping, community or health impacts? Surely these must be considered as well as the energy requirements. Certainly in this area the majority of the community are horrified by these very concerns as we realise the impact these developments will have.

It seems mad that ultimately the cost of all this will fall back on the public rather than the profit making companies. Transmission owners seem to get money as soon as they submit a planning application & then get the full cost if they deliver by 2030. This full cost appears to be the company's own calculation! This is a strange mixture of private companies versus public money where the privatised companies & their shareholders are guaranteed a very safe return of their expenditure.

Where in all this consultation is there a body looking after the interests of the public who are also the consumers? Surely there needs to be someone looking at the big picture not just the bottom line. The effect of transmitting all this power will be devastating on the areas affected & oddly enough these areas are least likely to benefit from this energy. Throughout this whole process there appears to be very little in the way of hard evidence or research. Surely SSEN should be expected to produce evidence for its proposals to show it has considered alternatives. In particular I would ask why the powerlines go subsea from Peterhead but not mainly to Peterhead? Why ruin good farmland here in Scotland but protect large swathes of the north of England?

If time allowed I could continue to express my concerns about how this project is being conducted but I am aware that the deadline is fast approaching. In addition SSEN also want feedback by 2/9/24. Not clever planning to have both deadlines so close but perhaps you are unaware of each other!

My email is at the top of this submission but I will sign off with my full contact details.

From:

Sent on: Wednesday, August 28, 2024 7:35:40 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed funding and approval for onshore Centralised Strategic Network Plan 2 projects

To: Jon Sharvil, Head of ET Investment Strategy,

Dear Jon Sharvil

As a resident and an electricity consumer in the north of Scotland I wish to object to the proposed electricity projects which are proposed throughout northern Scotland.

SSEN has run consultations throughout the area which were conducted as a done deal.

They were not able to provide the public with figures of how net zero could be achieved using alternative technologies to their proposed schemes. They chose to sidestep or ignore questions about how the Europeans are exporting electricity offshore and only making landfall close to the area of demand. They failed to explain how 1920's pylon transportation was better in the long term than using modern underground technology which works out cheaper over time and is widely used throughout Europe. They failed to show that consumers would benefit from cheaper electricity. The north of Scotland is leading the way in renewable energy but still has the highest unit costs in the UK. They also failed to demonstrate that their proposals were indeed green and that their plans were not simply exporting CO2 emissions to other countries especially China where much of the steel and perhaps concrete will be sourced,

They failed to show that their schemes would not have a serious detrimental effect on the following industries: tourism, agriculture, forestry. They glossed over the health concerns of those who have cared for Scotland's world-renowned scenery which will be seriously impacted. SSEN was at pains to conceal the fact that their infrastructure projects are to be paid for by the bill payer and that their community benefits are also paid for by the billpayers many of whom in the North of Scotland will be negatively impacted by their plans.

Much of SSEN's proposals are designed to export electricity from foreign companies' installations in Northern Scotland to the southern areas of demand. It is highly unusual for a producer to have others paying to have its product shipped to market.

SSEN presented their project as multiple smaller schemes so that it took some time for the population to be able to appreciate that they were proposing to seriously impact the tourism, agriculture, forestry, and residents from Wick to Beaully, from Lewis and Harris to Beaully, from Beaully to Keith and on to Peterhead and from Beaully to Kintore and down through The Mearns would all be affected.

The cumulative effect of SSEN's proposals with the additional on and offshore wind farms, solar farms, BESS storage and hydrogen plants will industrialize much of Northern Scotland spoiling its natural environment and beauty.

The laws of physics are not known to change quickly but it remains unexplained why so many of SSEN's proposals rapidly increased in size, e.g. Netherton Hub, Peterhead was proposed to require 100Ha in January 2023 and by autumn 2023 it had increased to 239Ha, similar increases at Keith and Beaully are also now evident. SSEN has not provided answers when asked about

this.

SSEN has failed to sufficiently alert the public about the build times of their schemes and the huge amount of disruption to areas close to them with many schemes have 4-year build times. On one of their Webinars SSEN had 500+ people where they programmed over 30 minutes for Q&A and then cut the time by half. They also had a moderator who selected the questions for the panel to answer and tricky or problematic questions and comments about the impact of the proposals were unseen by the attendees and not answered on the webinar or even after the event. At village hall meetings the SSEN panel used the tactic of several members answered the same question to reduce the number of questions and they also restricted the time for Q&A to approximately 20 minutes which .was insufficient for an audience of over 100 living close to a proposed installation which could cover an area 6 times the size of their village. They did not show scale models of their plans or scale models of their proposed pylons, preferring to use computer generated drive-through videos which showed scenery totally different to the area involved.

Although SSEN claims to listen to the public's concerns their consultations fell far short of what one would expect from a large PLC.

The idea that Ofgem appears to be willing to write blank cheques to shareholder profit focused transmission companies to pay for projects which the companies set their price is alien to best practice for allocating contracts. This is not in the consumers' best interest and Ofgem must protect consumers from this.

Prior to SSEN's consultation exercises the public and many politicians were unaware of the proposed Pathway to Net Zero 2030 and no consultations had been made about how Scotland should proceed to achieve the goal which had been set.

SSEN ran the consultation as a tick box exercise. Keen to log all attendees but then frequently provided vague answers to questions or didn't reply saying "this is still in planning".

The public is not being well served by this race to Net Zero. A proper competitive tendering process must be completed to ensure value for the consumer. There is nothing to show that SSEN's plans are being operated following UK Government guidelines in a careful, legal and open manner and in the public's interest. Much of Scotland will be seriously impacted by Ofgem and SSEN's proposals to export electricity south and will provide Scotland with little or zero long term benefit. The benefits will be realised by the many overseas investors in the windfarms and SSEN's shareholders (25% owned by Ontario Teachers' Pension Plan Board)

Ofgem must pause their race to Net Zero as currently the proposals fall far short of what is legally required .

From:

Sent on: Wednesday, August 28, 2024 7:18:43 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

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

Hi,

Really! I've just got sight of this with 3 days to go. What are doing, giving 31 days consultation and not telling anyone? The government standard is 6 weeks for minor changes, 12 weeks for anything significant. At 83 pages, it looks significant. OFGEM are supposed to protect us, the bill payer and tax payer, from the greed of big business and the stupidity of politicians. Not happening here! Instead of enjoying my retirement, I'm spending most of my time wrapped up in the machinations of TOs, Quangos and Government Departments trying to stop them from vandalising, through industrialisation, the last UK wilderness that is the Highlands of Scotland. Get a grip. Firstly, before I even look at the 83 pages, are you going to extend this supposed consultation which you've told no-one about?

Regards

From:

Sent on: Wednesday, August 28, 2024 6:56:37 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

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

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

Dear Mr Sharvill,

Please accept this as my objection and as a request that OFGEM withdraw / pause this flawed consultation.

* OFGEM has failed to conduct a truly public widespread consultation on this proposal, as it has not publicised this survey enough for the general public to notice the survey and be able to answer it within 30 days.

OFGEM is repeating the failure of its 2023 consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when it received very few responses, due to the above lack of notification, as the general public were unaware. There were only 2 responses from those who did not have a financial or political interest in covering the UK in pylons and substations.

* On Page 14 of this document it states "We have carefully considered each of these reports, along with our principal objectives as an independent regulator when deciding upon the framework and regulatory treatment proposed within this consultation."; however, the document portrays OFGEM as anything but independent and fully favours the developers. In at least one case, a current ASTI project was, scandalously, granted development consent by ESO

and ASTI status by OFGEM with absolutely no consideration of environmental, landscape, health, socioeconomic or community impacts. Ref: Treasury Green Book 3.14. In what way would any future funding scheme protect the public from such practices?

* On Page 21 of this document it states "We understand from TOs that in some cases, there could also be alternative options that have not been considered in tCSPN2, that could address the identified network needs. It is worth exploring these if they can do so at lower cost or greater speed. Where further detailed design results in material scope changes or increases to project costs then a refreshed assessment could explore if it is still economically beneficial to deliver the project." - There is more to this project than monetary value, so why are ordinary stakeholders, who are ultimately the bill payer, not allowed a similar say in how Net Zero / decarbonisation is achieved?

*OFGEM has a priority duty to protect energy consumers and we would ask OFGEM to pause / withdraw the ASTI framework, as this goes against the democratic rights of the ordinary consumer, who OFGEM are meant to protect. The ASTI framework is entirely focused on making things easier for transmission owners, electricity distribution operators, generating companies and other privately owned, profit focussed organisations.

On Page 28 of this document it states "Our ASTI framework has received support from stakeholders and is considered to be a key enabler for the timely delivery of transmission infrastructure."

It does not go into detail as to who these "stakeholders" are; however, we suspect that they will be "stakeholders" that are set to benefit from these projects going ahead.

Was a wide enough scope of "stakeholders" consulted to ensure that this consultation is not meaningless?

On Page 65 of this document it also states "As a minimum, we expect the TOs to have completed scoping and strategic optioneering works and identified a preferred solution to take forward to consenting."

It does not appear to state who the solution is preferred by, the developer or the ordinary person wholly affected by the installation of the infrastructure!

If decisions are made by developers, they will choose the route and method most beneficial to them, but there does not appear to be any insistence by OFGEM that ALL options be costed and proposed so that proper judgment can be made as to the solution that suits most, if not all, parties. NG-ESO have demonstrably failed to insist on holistic cost/benefit analysis before granting consent to projects. TKUP was granted ESO consent and OFGEM ASTI status without proper assessment of the impacts. Job losses and closure of businesses in tourism and agriculture have never been considered. Granting ASTI status is just a rubber stamping process performed by OFFGEM.

*In compiling this consultation, OFGEM does not appear to have taken the latest science into account, i.e., it states within the tCSPN2 proposals that this is seeking to "meet the wider network requirements of the next 10-15 years to facilitate connections of up to 86GW OWG, 45GW solar, 22GW batteries and 10GW of H2 electrolysis plants in Scotland, among other low carbon demand and generation."

As Hydrogen Electrolysis is only 33% efficient, i.e., for every 3 units of energy you put in, you will only get one unit of energy out, how can this be deemed to be as cost-effective?

It mentions above that this is for Scotland, yet Scotland is only expected to consume 9Gw of electricity in 2035, so we can only presume that the surplus energy is for export.

This means that it is being transmitted out of the area which is also a very inefficient method of moving the energy and it can lose up to 10% of the energy being transmitted.

Again, how can this be deemed to be cost effective? The endless building of grid infrastructure in order to provide capacity for ghost projects which will never be built, using billpayer's money is madness. There is no coordinated plan for the construction of infrastructure such as windfarms, BESS, hydrogen generators etc. it is just a wild west style goldrush for mainly overseas owned and registered profit focused companies. OFFGEM have totally failed to protect billpayers and communities.

The above statement "86GW OWG, 45GW solar, 22GW batteries and 10GW of H2 electrolysis plants in Scotland," is rather ambiguous as to whether only the "10GW of H2 electrolysis plants in Scotland" or if it is the full 50Gw (tCSPN1) plus the "86GW OWG, 45GW solar, 22GW batteries and 10GW of H2 electrolysis plants in Scotland" (tCSPN2) is in Scotland or is for the whole of the UK.

*Initially, the investment for the infrastructure projects was announced as £10Bn, then it went up to £20Bn and now £60Bn is being mentioned; however, there does not appear to be an upper limit on the level of investment.

As these projects are being paid for, in the majority, by the consumer / bill payer, where is the protection for the bill payer to ensure the costs do not rise too exorbitantly?

On Page 26 it states "Given the uncertainties set out above, we consider there could be significant risks to consumers from locking in immature project designs and delivery dates too early, before there is certainty of need and the optimal design has been identified."

Whilst it is prudent to not lock into a project too early, it also states "If there were significant changes to the location and volume of generation and demand, this could result in consumers being exposed to costs on assets that are not required or where the solution is economically suboptimal."

Does this mean that these plans are subject to change depending on where the location of the need is as against where the energy is being generated and may be subject to policy change depending on which political party is ruling at the time?

This appears to contradict the detailed statement "meet the wider network requirements of the next 10-15 years to facilitate connections of up to 86GW OWG, 45GW solar, 22GW batteries and 10GW of H2 electrolysis plants in Scotland, among other low carbon demand and generation."

* The ASTI Framework is trying to reduce planning decisions from an average of 5 years down to 6 months. Whilst we accept that there may be a lot of unnecessary administration within planning decisions, it is 5 years for good reason and should not be reduced down to 6 months as this gives an unfair advantage to the developers.

These developers have full-time personnel working on planning applications; however, most of the ordinary consumers that are commenting / objecting to these planning decisions can only

afford to work on them part-time, as they usually have full-time jobs as well. The planning system is already extremely biased in favour of developers e.g. no right of appeal against a decision to consent, but developers can appeal against refusal. Developers have as much time as they require to produce a planning application but objectors only have ~30 days to construct an objection. Instead of destroying the rights of communities and residents to actively contribute towards decisions regarding what happens in their neighbourhood, the current emphasis seems to be to rush through totally unsuitable projects which only benefit the developers and cause massive and long lasting negative impacts to the environment and communities.

Has an analysis of the availability of raw materials been carried out to ensure that the projects can still be completed within the timescales? It would appear to be a self-defeating exercise, if the planning decisions were reduced down to 6 months only for the raw materials to not be available for many, many months, if not years!

*OFGEM have supported ASTI Framework without it being properly debated in Parliament, which is another instance of the general public having their democratic rights removed.

Again, we would ask that OFGEM pause the instigation of the new ASTI Framework so that a full and frank debate be allowed to take place. This consultation is weighted very much in favour of the developers with little regard for the ordinary consumer which is extremely unjust and undemocratic.

*In compiling this consultation, OFGEM does not appear to have taken a number of factors into account, i.e., environmental considerations, landscape, effect on prime agricultural land, health issues, etc. as these are being overridden in the race to achieve Net Zero.

*In compiling this consultation, OFGEM does not appear to have taken the latest innovations into account, i.e., using HVDC instead of HVAC, using alternatives to OHL's, using alternatives routes for the OHL's and appears to be going by what they are told by the TO's.

The TO's appear to be allowed to write their own specification for their respective projects and, as such, can write their own budgets, which would not be allowed in an open market scenario. Even more ridiculously, the proposed new framework includes a proposal for an immediate grant of 2.5% of project costs to developers on a use it or lose it basis where they can use the funds on totally different projects. Where is the control of public spending? Why are the UK billpayers/taxpayers not only throwing money at private companies, but also removing business risk?

We understand that the TO's are operating under licence, however, this is an extremely non-competitive practice as no-one else appears to be allowed to tender for these projects, thus removing competition.

*Public spending must conform to the requirements of HM Treasury's 'GREEN BOOK' rules, which states that public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible.

The spending should provide benefits to the UK population; however, if ASTI is continued it would ignore a number of the requirements within the Green Book and other HM Treasury guidance and regulation.

Fundamentally the relationship between OFGEM, NG-ESO and the TOs is highly questionable. It is at best immoral and more than probably corrupt. I realise that NG-ESO is going to be replaced at some time in the future but the decisions regarding consent for the current ASTI projects, and those to be considered by a replacement, tCSNP2 system, were made by a, conflict of interest ridden, subsidiary of one of the TOs. Claims of glass walls between NG-ESO and National Grid are meaningless, they even share board members. To an outsider to the industry, ASTI seems to be nothing but collusion between private profit focused organisations deciding how to share billions of pounds worth of UK billpayers/tax payers money between themselves. If nothing else the subject should have been debated in the public domain before being implemented. ASTI is mentioned only once in Hansard in a short, minor, out of context discussion It now appears that Ofgem are trying similar, 'under the radar' tactics to introduce an equally flawed system, saying it has 'stakeholder' support. The major stakeholder in the UK energy transmission system is the UK billpayer, but they seem to be deliberately excluded from consultation and influence.

This consultation should be abandoned due to failure to follow established good practice and a new consultation involving not only those with a vested interest instigated. I would point you towards the Gunning Principles which state, to be considered a valid consultation, 1) Consultation must take place when the proposal is still at a formative stage. 2) Sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response. 3) Adequate time must be given for consideration and response. 4) The results of consultation must be conscientiously taken into account.

Already the first three principals have been ignored by OFGEM.

Yours sincerely,

From:

Sent on: Wednesday, August 28, 2024 2:50:23 PM

To: Jon Sharvill <Jon.Sharvill@ofgem.gov.uk>

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

Urgent: High

I consider 13th September is still too short a timeline. For something of this scale that has major ramifications for the public I would suggest this needs at least 6 months. Furthermore, I don't think that expecting the public to request notifications from OFGEM in order to be aware of such changes is sufficient. Most people are unaware of these proposals (I certainly was unaware) and expecting them to sign up to made aware is not sufficient. I would have expected to have had notice of this through the Press and social media. I would also have expected the operators that you regulate to also publish this but so far I have not heard anything (other than through my own social media connections). As a member of the public, I feel quite aggrieved that you make such major proposals yet rely on us finding out ourselves about them. This does not feel like OFGEM is considering the public in their role as the regulator but rather you are working in the

interests of those you regulate to push such changes through with little resistance. I ask you to think again how all these proposals are published and to consider extending the timeline and advertising of this proposal. Regardless of how you decide to proceed, I request you register and count my strong objection to the proposal.

Regards

From:

Sent on: Wednesday, August 28, 2024 8:14:41 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Timeframe and objection

Dear Mr Sharvill,

Please accept this as our objection and our request that OFGEM withdraw / pause this consultation, and the reasons for this are below.

*** OFGEM has failed to conduct a truly public widespread consultation** on this proposal, as it has not publicised this survey enough for the general public to notice the survey and be able to answer it within 30 days.

OFGEM is repeating the failure of its 2023 consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when it received very few responses, due to the above lack of notification, as the general public were unaware.

(I was made aware of this survey by an acquaintance less than 2 weeks ago, and had I had more time as I also work full time, would have commented more fully.)

*** On Page 14 of this document it states** *"We have carefully considered each of these reports, along with our principal objectives as an independent regulator when deciding upon the framework and regulatory treatment proposed within this consultation."*; however, the document portrays OFGEM as anything but independent and fully favours the developers.

*** On Page 21 of this document it states** *"We understand from TOs that in some cases, there could also be alternative options that have not been considered in tCSNP2, that could address the identified network needs. It is worth exploring these if they can do so at lower cost or greater speed. Where further detailed design results in material scope changes or increases to project costs then a refreshed assessment could explore if it is still economically beneficial to deliver the project."* - There is more to this project than monetary value, so why are ordinary stakeholders, who are ultimately the bill payer, not allowed a similar say in how Net Zero / decarbonisation is achieved?

***OFGEM has a priority duty to protect energy consumers** and we would ask OFGEM to pause / withdraw the ASTI framework, as this goes against the democratic rights of the ordinary consumer, who OFGEM are meant to protect.

On Page 28 of this document it states "*Our ASTI framework has received support from stakeholders and is considered to be a key enabler for the timely delivery of transmission infrastructure.*"

It does not go into detail as to who these "stakeholders" are; however, we suspect that they will be "stakeholders" that are set to benefit from these projects going ahead.

Was a wide enough scope of "stakeholders" consulted to ensure that this consultation is not meaningless?

On Page 65 of this document it also states "As a minimum, we expect the TOs to have completed scoping and strategic optioneering works and identified **a preferred solution** to take forward to consenting."

It does not appear to state who the solution is preferred by, the developer or the ordinary person wholly affected by the installation of the infrastructure!

If decisions are made by developers, they will choose the route and method most beneficial to them, but there does not appear to be any insistence by OFGEM that **ALL** options be costed and proposed so that proper judgment can be made as to the solution that suits most, if not all, parties.

***In compiling this consultation, OFGEM does not appear to have taken the latest science into account**, i.e., it states within the tCSPN2 proposals that this is seeking to "*meet the wider network requirements of the next 10-15 years to facilitate connections of up to 86GW OWG, 45GW solar, 22GW batteries and 10GW of H2 electrolysis plants in Scotland, among other low carbon demand and generation.*"

As Hydrogen Electrolysis is only 33% efficient, i.e., for every 3 units of energy you put in, you will only get one unit of energy out, how can this be deemed to be as cost-effective?

It mentions above that this is for Scotland, yet Scotland is only expected to consume 9Gw of electricity in 2035, so we can only presume that the surplus energy is for export.

This means that it is being transmitted out of the area which is also a very inefficient method of moving the energy and it can lose up to 10% of the energy being transmitted.

Again, how can this be deemed to be cost effective.

The above statement "*86GW OWG, 45GW solar, 22GW batteries and 10GW of H2 electrolysis plants in Scotland,*" is rather ambiguous as to whether only the "*10GW of H2 electrolysis plants in Scotland*" or if it is the full 50Gw (tCSPN1) plus the "*86GW OWG, 45GW solar, 22GW batteries and 10GW of H2 electrolysis plants in Scotland*" (tCSPN2) is in Scotland or is for the whole of the UK.

***Initially, the investment for the infrastructure projects was announced as £10Bn**, then it went up to £20Bn and now £60Bn is being mentioned; however, there does not appear to be an upper limit on the level of investment.

As these projects are being paid for, in the majority, by the consumer / bill payer, where is the protection for the bill payer to ensure the costs do not rise too exorbitantly?

On Page 26 it states *"Given the uncertainties set out above, we consider there could be significant risks to consumers from locking in immature project designs and delivery dates too early, before there is certainty of need and the optimal design has been identified."*

Whilst it is prudent to not lock into a project too early, it also states *"If there were significant changes to the location and volume of generation and demand, this could result in consumers being exposed to costs on assets that are not required or where the solution is economically suboptimal."*

Does this mean that these plans are subject to change depending on where the location of the need is as against where the energy is being generated and may be subject to policy change depending on which political party is ruling at the time?

This appears to contradict the detailed statement *"meet the wider network requirements of the next 10-15 years to facilitate connections of up to 86GW OWG, 45GW solar, 22GW batteries and 10GW of H2 electrolysis plants in Scotland, among other low carbon demand and generation."*

*** The ASTI Framework is trying to reduce planning decisions from an average of 5 years down to 6 months.** Whilst we accept that there may be a lot of unnecessary administration within planning decisions, it is 5 years for good reason and should not be reduced down to 6 months as this gives an unfair advantage to the developers.

These developers have full-time personnel working on planning applications; however, most of the ordinary consumers that are commenting / objecting to these planning decisions can only afford to work on them part-time, as they usually have full-time jobs as well.

Has an analysis of the availability of raw materials been carried out to ensure that the projects can still be completed within the timescales.

It would appear to be a self-defeating exercise, if the planning decisions were reduced down to 6 months only for the raw materials to not be available for many many months, if not years!

***OFGEM have supported ASTI Framework without it being properly debated in Parliament,** which is another instance of the general public having their democratic rights removed.

Again, we would ask that OFGEM pause the instigation of the ASTI Framework so that a full and frank debate be allowed to take place. This consultation is weighted very much in favour of the developers with little regard for the ordinary consumer which is extremely unjust and undemocratic.

***In compiling this consultation, OFGEM does not appear to have taken a number of factors into account,** i.e., environmental considerations, landscape, effect on prime agricultural land, health issues, etc. as these are being overridden in the race to achieve Net Zero.

***In compiling this consultation, OFGEM does not appear to have taken the latest innovations into account,** i.e., using HVDC instead of HVAC, using alternatives to OHL's, using alternatives routes for the OHL's and appears to be going by what they are told by the TO's.

The TO's appear to be allowed to write their own specification for their respective projects and, as such, can write their own budgets, which would not be allowed in an open market scenario.

We understand that the TO's are operating under licence to National Grid, however, this is an extremely non-competitive practice as no-one else appears to be allowed to tender for these projects, thus removing competition.

***Public spending must conform to the requirements of HM Treasury's 'GREEN BOOK' rules**, which states that public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible.

The spending should provide benefits to the UK population; however, if ASTI is implemented it would ignore a number of the requirements within the Green Book.

From:

Sent on: Wednesday, August 28, 2024 8:14:05 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

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

Urgent: High

Jon,

I have only just been made aware of this consultation which, on the face of it, appears to be proposing a fast-track approach to approving such projects. This does not appear to be in the interests of the public and would favour developers eager to progress projects on behalf of shareholders. Having only just been made aware of this proposal today I am quite shocked that you think 30 days is sufficient time to allow lay members of the public, most of whom have daytime jobs, to fully understand and respond to this. The fact that I was only made aware through campaign groups on Facebook, that you think 30 days is sufficient, and that there are only 2 days left to respond, please accept my objection to your proposal.

Please acknowledge receipt.

Regards

From:

Sent on: Wednesday, August 28, 2024 5:40:22 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Ofgen consultation.

Good morning,

There is currently a consultation taking place regarding the headlong race to Net Zero, although aimed at the “interested” parties, my views are simple and straightforward- the speed of “conversion” is going to both prove exceptionally expensive and serious mistakes will happen.

The timeframe, 2030, you are working towards is impossible, within your consultation document you clearly state that from start to finish, these large scale conversions take a minimum of twelve years, and that is without delays due to supply shortages, labour shortages and objections- to think that completion of a project of this scale and complexity can take place within just four years is impossible and delusional.

The “market” you envisage will include trading surplus energy via the internet connectors, given a balanced supply- which is nonsense.

Currently we typically pay more than the market price for buys and accept less than market price for sells. Looking at the detailed data, the maximum purchase price was £6,599.98/MWh on 20th July 2022 when the reference price was £247.91/MWh. The minimum sale price was £-404.71/MWh on 29th May 2023 when the reference price was £63/MWh. It is also interesting to note that for the whole of 2023, the average sale price was slightly negative (£-0.22/MWh). These negative sales prices mean we paid others to take this electricity off our hands....Again, [referring to the graph accompanying his analysis] we can see the blue buy-prices are generally above the market reference price and the orange sell prices are generally below the reference price. In fact, for part of 1st December, we had to pay over £700/MWh for interconnector supplies when wind generation was low and demand was high. We also paid over £400/MWh on 6th December even though wind was generating over 6GW. Whereas, over the Christmas period we were paying people to take surplus generation off our hands...As we can see, most of the electricity sold is from 22:00-06:00. There is also a residual tail of sales from 07:00-14:00, reflecting the demand lull in the middle of the day. Most is bought in the morning peak from 05:00-07:00 and then again during the evening peak from 16:00-21:00...As might be expected we are selling most when demand is low and buying when demand is high, reflecting the fact that we are not really in control of generation and cannot use it to match demand....Even though the volumes sold during sleeping hours are high, the value of that electricity is low. In aggregate, the electricity sold during the middle of the day has negative value, so we pay others to take it off our hands. By contrast, we pay through the nose for the electricity we buy at peak hours.

Constraints payments represent another cost that only seems to grow, an inevitable consequence of increasing the number of wind farms without having in place an adequate system to cope with the wild fluctuations in power they generate. A couple of shocking news reports have come to light in just the last few days – the Scottish Daily Mail reported that Scottish wind farms have received £205 million in constraints payments so far this year, with £45 million being paid this month alone. Today the Shetland News reported that SSE “has

already claimed more than £2 million in constraint payments this month and ahead of the multi-million pound project [Viking Energy on Shetland] switching on.” Ahead of its switch-on! How can that be?

In conclusion, you are presiding over the destruction of an energy system that worked cheaply and efficiently and its replacement by one that is inefficient, expensive, and dependent on the kindness (or avarice) of strangers and the weather. I appreciate that Parliament has imposed this destructive task upon you, but you do not have to be enthusiastic about an acceleration of the task that is not yet a statutory duty on your part. Until these basic points are addressed, Ofgem consultations will continue to amount to little more than an exercise in futility.

Kindest regards,

From:

Sent on: Sunday, September 1, 2024 5:59:20 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Consultation on Proposed regulatory funding and approval framework for onshore tCSNP2 projects

Consultation on Proposed regulatory funding and approval framework for onshore tCSNP2 projects

Dear Mr Sharvill,

I was lead to believe that you had emailed several members of the public to tell them that due to public comment on the combined lack of publicity and short opportunity to respond, the consultation window had been extended.

The Ofgem webpage now says that the consultation is closed as planned. It would appear that only those who complained directly to you will be allowed to comment. What about the potentially thousands of members of the public who wanted to comment and thought they had longer to do so? Who knows how many were in this situation and missed the opportunity thinking they had 2 more weeks to construct a response. The public do not have the resources required to read, analyse and comment on such detailed proposals that your favoured consultees, the big energy companies, windfarm operators etc. possess. This is yet another example of Ofgem public consultations not being intended for the public but a very limited number of organisations that Ofgem refer to as “Stakeholders” who all have one thing in common they have a financial or vested interest in covering the country in pylons, substations, windfarms, hydrogen generators and other industrialisation. It is all about profit and extracting money from the billpayer and taxpayer, regardless of the harm done to the country and

population. Please consider this as an objection to the highly flawed consultation process intended to create a biased result.

Yours faithfully,

From:

Sent on: Tuesday, August 27, 2024 7:37:14 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

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

I am responding to your Consultation on the proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects, dated 1st August 2024.

You say you would like views from people with an interest in development of the electricity transmission network and Net Zero, and that certainly includes me, albeit I lack the engineering qualifications to comment specifically on the various detailed questions you pose. I confine my observations, instead, to pointing out that Ofgem is seriously conflicted with regard to the obligations imposed on it by statute. Instead of continuing to pursue mutually contradictory objectives at significant expense to the customer and involving great harm to the environment, you would do better to speak truth unto power and point out to your political masters that the objectives they have set you cannot be met.

In your Executive Summary you point out that “*Significant investment is required in the electricity transmission (ET) network to decarbonise the system and facilitate the transition to Net Zero. This is to enable connection of new renewable generation to the system, and to ensure the network has sufficient capacity to transmit the energy generated to where demand is located.*” That has to be the understatement of the century. You repeat the statement at paragraph 2.3, following on from your noting that Ofgem has a statutory duty, under the Energy Act 2023, to support the government to meet its legal obligation to deliver Net Zero by 2050.

Yet you go further, and (Para 2.10) support the new Labour administration in its preposterous proposals to decarbonise the electricity system by 2030 – the 2030 Clean Power Plan (“CPP2030”). So far as I am aware, you are not (yet) legally obliged to support the plan. And yet you do, despite the fact that it should be obvious that the plan cannot be achieved and that a huge amount of money will be wasted in trying to achieve it. You say (paragraph 2.4) that “*Historically, it has typically taken around 12 to 14 years to deliver large onshore ET projects, from conception through to commissioning*” and go on to ignore the hard realities of the situation by supporting CP2030. Quite how the UK is to double onshore wind, triple solar power, and quadruple offshore wind by 2030 is something of a mystery given our performance to date

with regard to timescales from conception through to commissioning. Furthermore, anyone with any experience in projects of this nature knows that trying to force them through in unrealistic timescales will multiply both costs and errors.

You ignore the fact that those countries with the greatest percentage of wind penetration in their electricity systems are also those with the highest household electricity prices. The UK has the dubious honour of having some of the most expensive electricity in the world, despite “leading the way” in rolling out wind farms.

Your press release of 19th August 2024 regarding the “Strategic Innovation Fund [SIF] to drive progress to net zero by 2030” says its projects “*support efforts to end the era of high energy bills, excessive carbon emissions and energy insecurity by accelerating the transition to clean, homegrown energy*”. Despite your role at the heart of energy policy you seem to fail to understand that this is a trilemma, a set of mutually contradictory objectives, a triangle that cannot be squared. We cannot drive down energy bills by making ourselves dependent on technology that works only some of the time, and requires back-up, whether from astonishingly impracticable and expensive numbers of batteries, or from gas-fired power stations, which have to be run inefficiently (and therefore more expensively than necessary) due to the subordinate role they are condemned to play. The Government's own Levelised Cost of Electricity calculation acknowledges that:

“While dispatchable technologies like CCGTs and CCUS generally help to reduce system costs, they run at less than maximum load factors and therefore their levelised costs increase. In these... scenarios, generally (but not always) the system savings outweigh the load factor impacts, resulting in an overall cost reduction. Intermittent technologies (e.g. wind and solar) generally impose a wider system cost, which is more severe in scenarios with lower flexibility or a less diverse generation mix.....The value of additional CCGT capacity to the system is greater in scenarios where demand increases faster or there is a higher proportion of intermittent renewable capacity...”

National Grid ESO's Future Energy Scenarios, published in July 2020, indicated that the cost of reaching net zero in the UK's energy network will be £3 Trillion or thereabouts, a cost of around £4,000 per household every year between now and 2050. Those costs might be buried in general taxation, or may be loaded on to the price of gas to pretend that electricity is relatively cheaper, or they may be borne by businesses (which will pass them on to their customers), but however the cost is distributed, it will be borne in the end by consumers and taxpayers. Quite how that ends the era of high energy bills is beyond me, and I suggest it should be beyond you too, yet you seek to accelerate the pain by supporting CP2030. I say businesses will perhaps bear some of the costs (and pass them on to their customers) but increasingly those businesses are not manufacturing ones. I note that for the first time since the beginning of the industrial revolution, the UK is no longer among the world's top ten manufacturing nations. No doubt the price of electricity in the UK has more than a passing role to play in this regard – businesses lack the modest and inadequate benefit of the price cap “enjoyed” by domestic electricity consumers.

As for energy security, we seem to be importing more and more electricity via the interconnectors (I regularly spot imports of around 15% of our needs, and have seen them as high as 25%). The interconnectors on which we seem to be increasingly reliant are vulnerable to accidents or to malfeasance by bad actors (whether terrorists or hostile states). A few reminders might be in order before you continue down the road of more and more cables between various parts of the UK and from offshore wind farms to the main land. Numerous problems with the Western Link cable led to an Ofgem probe into what went wrong, and resulted in National Grid ESO paying almost £31m for wind farm operators to curtail output. At one point, average constraint costs arising from these failures rose to £6.1 million per day. Then there was the failure of the BritNed cable between the UK and the Netherlands in 2021. How about the failure of the Orkney-Pentland East cable (which cost £30 million)? One of the most spectacular and long-running failures was in respect of the Western Isles cable. Things have been so bad that in 2021 the company that owns the link to Gwynt y Môr wind farm argued that a series of repair outages required following a cable failure in October 2020 should be underwritten by consumers because insurers are leaving the market. The company noted at the time that the cost of insurance had risen 40 per cent in the past two years and many insurers were declining to provide cover.

I appreciate that interconnectors are generally promoted as an enhancement to our energy security by allowing the UK to export surplus electricity to the continent and by allowing us to import it when we are short. But a well-run system wouldn't have regular surpluses and shortages that makes us dependent on offloading to, or importing from, foreigners. That isn't what energy security looks like. The problem is compounded by the fact that as the UK's electricity production is increasingly weather-dependent, it suffers from the fact that when it's excessively windy here it usually is on the near continent too; and when the UK sits becalmed under an anticyclone so, often, do our European neighbours. This results in us seeking to offload our electricity when there isn't a market for it, and needing to import it when it's in short supply. As David Turver has pointed out:

“We typically pay more than the market price for buys and accept less than market price for sells. Looking at the detailed data, the maximum purchase price was £6,599.98/MWh on 20th July 2022 when the reference price was £247.91/MWh. The minimum sale price was £-404.71/MWh on 29th May 2023 when the reference price was £63/MWh. It is also interesting to note that for the whole of 2023, the average sale price was slightly negative (£-0.22/MWh). These negative sales prices mean we paid others to take this electricity off our hands....Again, [referring to the graph accompanying his analysis] we can see the blue buy-prices are generally above the market reference price and the orange sell prices are generally below the reference price. In fact, for part of 1st December, we had to pay over £700/MWh for interconnector supplies when wind generation was low and demand was high. We also paid over £400/MWh on 6th December even though wind was generating over 6GW. Whereas, over the Christmas period we were paying people to take surplus generation off our hands...As we can see, most of the electricity sold is from 22:00-06:00. There is also a residual tail of sales from 07:00-14:00, reflecting the demand lull in the middle of the day. Most is bought in the morning peak from 05:00-07:00 and then again during the evening peak from 16:00-21:00...As

might be expected we are selling most when demand is low and buying when demand is high, reflecting the fact that we are not really in control of generation and cannot use it to match demand....Even though the volumes sold during sleeping hours are high, the value of that electricity is low. In aggregate, the electricity sold during the middle of the day has negative value, so we pay others to take it off our hands. By contrast, we pay through the nose for the electricity we buy at peak hours.”

Constraints payments represent another cost that only seems to grow, an inevitable consequence of increasing the number of wind farms without having in place an adequate system to cope with the wild fluctuations in power they generate. A couple of shocking news reports have come to light in just the last few days – the Scottish Daily Mail reported that Scottish wind farms have received £205 million in constraints payments so far this year, with £45 million being paid this month alone. Today the Shetland News reported that SSE “*has already claimed more than £2 million in constraint payments this month and ahead of the multi-million pound project [Viking Energy on Shetland] switching on.*” **Ahead of its switch-on!** How can that be?

In conclusion, you are presiding over the destruction of an energy system that worked cheaply and efficiently and its replacement by one that is inefficient, expensive, and dependent on the kindness (or avarice) of strangers and the weather. I appreciate that Parliament has imposed this destructive task upon you, but you do not have to be enthusiastic about an acceleration of the task that is not yet a statutory duty on your part. Until these basic points are addressed, Ofgem consultations will continue to amount to little more than an exercise in futility.

From:

Sent on: Tuesday, August 27, 2024 6:24:13 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Objection and Comments re 'Consultation on the proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects'.

Dear Mr Sharvill,

Please accept this as our objection and our request that OFGEM withdraw / pause this consultation, and the reasons for this are below.

*** OFGEM has failed to conduct a truly public widespread consultation** on this proposal, as it has not publicised this survey enough for the general public to notice the survey and be able to answer it within 30 days.

OFGEM is repeating the failure of its 2023 consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when it received very few responses, due to the above lack of notification, as the general public were unaware.

(I was made aware of this survey by an acquaintance less than 2 weeks ago, and had I had more time as I also work full time, would have commented more fully.)

*** On Page 14 of this document it states** *"We have carefully considered each of these reports, along with our principal objectives as an independent regulator when deciding upon the framework and regulatory treatment proposed within this consultation."*; however, the document portrays OFGEM as anything but independent and fully favours the developers.

*** On Page 21 of this document it states** *"We understand from TOs that in some cases, there could also be alternative options that have not been considered in tCSNP2, that could address the identified network needs. It is worth exploring these if they can do so at lower cost or greater speed. Where further detailed design results in material scope changes or increases to project costs then a refreshed assessment could explore if it is still economically beneficial to deliver the project."* - There is more to this project than monetary value, so why are ordinary stakeholders, who are ultimately the bill payer, not allowed a similar say in how Net Zero / decarbonisation is achieved?

***OFGEM has a priority duty to protect energy consumers** and we would ask OFGEM to pause / withdraw the ASTI framework, as this goes against the democratic rights of the ordinary consumer, who OFGEM are meant to protect.

On Page 28 of this document it states *"Our ASTI framework has received support from stakeholders and is considered to be a key enabler for the timely delivery of transmission infrastructure."*

It does not go into detail as to who these "stakeholders" are; however, we suspect that they will be "stakeholders" that are set to benefit from these projects going ahead.

Was a wide enough scope of "stakeholders" consulted to ensure that this consultation is not meaningless?

On Page 65 of this document it also states *"As a minimum, we expect the TOs to have completed scoping and strategic optioneering works and identified **a preferred solution** to take forward to consenting."*

It does not appear to state who the solution is preferred by, the developer or the ordinary person wholly affected by the installation of the infrastructure!

If decisions are made by developers, they will choose the route and method most beneficial to them, but there does not appear to be any insistence by OFGEM that **ALL** options be costed and proposed so that proper judgment can be made as to the solution that suits most, if not all, parties.

***In compiling this consultation, OFGEM does not appear to have taken the latest science into account**, i.e., it states within the tCSPN2 proposals that this is seeking to *"meet the wider network requirements of the next 10-15 years to facilitate connections of up to 86GW OWG, 45GW solar, 22GW batteries and 10GW of H2 electrolysis plants in Scotland, among other low carbon demand and generation."*

As Hydrogen Electrolysis is only 33% efficient, i.e., for every 3 units of energy you put in, you will only get one unit of energy out, how can this be deemed to be as cost-effective?

It mentions above that this is for Scotland, yet Scotland is only expected to consume 9Gw of electricity in 2035, so we can only presume that the surplus energy is for export.

This means that it is being transmitted out of the area which is also a very inefficient method of moving the energy and it can lose up to 10% of the energy being transmitted.

Again, how can this be deemed to be cost effective.

The above statement *"86GW OWG, 45GW solar, 22GW batteries and 10GW of H2 electrolysis plants in Scotland,"* is rather ambiguous as to whether only the *"10GW of H2 electrolysis plants in Scotland"* or if it is the full 50Gw (tCSPN1) plus the *"86GW OWG, 45GW solar, 22GW batteries and 10GW of H2 electrolysis plants in Scotland"* (tCSPN2) is in Scotland or is for the whole of the UK.

***Initially, the investment for the infrastructure projects was announced as £10Bn**, then it went up to £20Bn and now £60Bn is being mentioned; however, there does not appear to be an upper limit on the level of investment.

As these projects are being paid for, in the majority, by the consumer / bill payer, where is the protection for the bill payer to ensure the costs do not rise too exorbitantly?

On Page 26 it states *"Given the uncertainties set out above, we consider there could be significant risks to consumers from locking in immature project designs and delivery dates too early, before there is certainty of need and the optimal design has been identified."*

Whilst it is prudent to not lock into a project too early, it also states *"If there were significant changes to the location and volume of generation and demand, this could result in consumers being exposed to costs on assets that are not required or where the solution is economically suboptimal."*

Does this mean that these plans are subject to change depending on where the location of the need is as against where the energy is being generated and may be subject to policy change depending on which political party is ruling at the time?

This appears to contradict the detailed statement *"meet the wider network requirements of the next 10-15 years to facilitate connections of up to 86GW OWG, 45GW solar, 22GW batteries*

and 10GW of H2 electrolysis plants in Scotland, among other low carbon demand and generation."

*** The ASTI Framework is trying to reduce planning decisions from an average of 5 years down to 6 months.** Whilst we accept that there may be a lot of unnecessary administration within planning decisions, it is 5 years for good reason and should not be reduced down to 6 months as this gives an unfair advantage to the developers.

These developers have full-time personnel working on planning applications; however, most of the ordinary consumers that are commenting / objecting to these planning decisions can only afford to work on them part-time, as they usually have full-time jobs as well.

Has an analysis of the availability of raw materials been carried out to ensure that the projects can still be completed within the timescales.

It would appear to be a self-defeating exercise, if the planning decisions were reduced down to 6 months only for the raw materials to not be available for many many months, if not years!

***OFGEM have supported ASTI Framework without it being properly debated in Parliament,** which is another instance of the general public having their democratic rights removed.

Again, we would ask that OFGEM pause the instigation of the ASTI Framework so that a full and frank debate be allowed to take place. This consultation is weighted very much in favour of the developers with little regard for the ordinary consumer which is extremely unjust and undemocratic.

***In compiling this consultation, OFGEM does not appear to have taken a number of factors into account,** i.e., environmental considerations, landscape, effect on prime agricultural land, health issues, etc. as these are being overridden in the race to achieve Net Zero.

***In compiling this consultation, OFGEM does not appear to have taken the latest innovations into account,** i.e., using HVDC instead of HVAC, using alternatives to OHL's, using alternatives routes for the OHL's and appears to be going by what they are told by the TO's.

The TO's appear to be allowed to write their own specification for their respective projects and, as such, can write their own budgets, which would not be allowed in an open market scenario.

We understand that the TO's are operating under licence to National Grid, however, this is an extremely non-competitive practice as no-one else appears to be allowed to tender for these projects, thus removing competition.

***Public spending must conform to the requirements of HM Treasury's 'GREEN BOOK' rules,** which states that public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible.

The spending should provide benefits to the UK population; however, if ASTI is implemented it would ignore a number of the requirements within the Green Book.

Regards,

From:

Sent on: Tuesday, August 27, 2024 12:28:22 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

Dear Jon Sharvill

I am writing to object and call on OFGEM to withdraw/pause this consultation for the following reasons:

* its failure to conduct truly public widespread consultation both on this proposal - days online only is unacceptable. OFGEM is repeating its failure of the 2023 consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented, when the rest of UK's 70 million population were unaware.

- OFGEM has a priority duty to protect energy consumers as so OFGEM must not enable this nor the ASTI framework, nor ever allow funds to be spent writing blank cheques to share-holder-owned, profit-focused transmission companies to pay for projects that these companies scheme up & set their own price on in the first place.

- As a priority, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects share-holder-owned transmission companies from investment risk and gives monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing

Further reasons are:

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION given to environmental, landscape, community or health impacts.

ASTI status means electricity bill payers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't factor inflation and has already shot up! . Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque.

If TO's delivers their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way -free from competition. If another provider company showing how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by Ofgem without it ever being discussed properly in Parliament or in any other public debate. It was mentioned once in Hansard, out of context in a minor debate. The 2023 so called public consultation - just like this one - was done in a way that the public had no idea what was happening. IN the real world private, profit -focussed companies BID/ Compete to build infrastructure, - they have to take a risk. They need to raise capital, take risk they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government expecting consumers to pay whatever! . The TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!

Public spending must conform to requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to a bunch of those requirements.

Regards

From:

Sent on: Monday, August 26, 2024 5:30:05 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the

To Jon Sharvill, OFGEM Head of ET Investment
Strategy RIIOElectricityTransmission@ofgem.gov.uk

I write this OBJECTING and calling on OFGEM to withdraw/pause this consultation as premature for reasons of

- its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when

only one member of the public commented when the rest of UK's 70 million population were unaware.

- OFGEM has a priority duty to protect energy consumers as so OFGEM must NOT enable this nor the ASTI framework NOR ever allow public funds to be spent writing blank cheques to share-holder- owned, profit-focused transmission companies to pay for projects that these companies scheme up & set their own price on in the first place.

- As a priority, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects share-holder own transmission companies from investment risk and gives the monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them.

- MY further reasons are:

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION given to environmental, landscape, community or health impacts.

ASTI status means consumer electricity bill payers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't take factor inflation and has already shot up! . Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque.

If TO's deliver their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way -free from competition. If another provider company shows how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by OFGEM without it ever being discussed properly in Parliament or in any other public debate. It was mentioned once in Hansard, out of context in a minor debate. The 2023 so-called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it a brilliant idea. They've repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening. I

IN the real world private, profit -focussed companies BID/ compete to build infrastructure, - they have to take a risk. They need to raise capital, take risk they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government expecting consumers to pay whatever! . The TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!

Public spending must conform to requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to these requirements.

From:

Sent on: Monday, August 26, 2024 8:59:05 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

To Jon Sharvill, OFGEM Head of ET Investment
Strategy RIIOElectricityTransmission@ofgem.gov.uk

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

(OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects.)

I write this OBJECTING and calling on OFGEM to withdraw/pause this consultation as premature for reasons of.....

- its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable.

I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced

Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented, when the rest of UK's 70 million population were unaware.

- OFGEM has a priority duty to protect energy consumers as so OFGEM must NOT enable this nor the ASTI framework NOR ever allow public funds to be spent writing blank cheques to share-holder- owned, profit-focused transmission companies to pay for projects that these companies scheme up & set their own price on in the first place.

- As a priority,, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects share-holder own transmission companies from investment risk and gives the monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them

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- MY further reasons are:

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION given to environmental, landscape, community or health impacts.

ASTI status means consumer electricity bill payers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't take and factor inflation which has already shot up! . Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque.

If TO's deliver their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way -free from competition. If another provider company shows how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by OFGEM without it ever being discussed properly in Parliament or in any other public debate. It was mentioned once in Hansard, out of context in a minor debate. The 2023 so-called public consultation - just like this one - was done in a way that the public had no idea what was happening.

With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it a brilliant idea. They've repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening.

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This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum

of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!

Public spending must conform to the requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to a bunch of those requirements.

From:

Sent on: Monday, August 26, 2024 8:58:30 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

To Jon Sharvill, OFGEM Head of ET Investment
Strategy RIIOElectricityTransmission@ofgem.gov.uk

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

(OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects.)

I write this OBJECTING and calling on OFGEM to withdraw/pause this consultation as premature for reasons of.....

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I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented, when the rest of UK's 70 million population were unaware.

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- As a priority,, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects share-holder own transmission companies from investment risk and gives the monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them

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From:

Sent on: Sunday, August 25, 2024 7:37:42 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recomm...

Good morning

I write this OBJECTING and calling on OFGEM to withdraw/pause this consultation as premature for reasons of

- its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware.

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Thank you

From:

Sent on: Sunday, August 25, 2024 6:26:22 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Objection

To Jon Sharvill,

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects.)

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This needs to be reviewed immediately!

From:

Sent on: Sunday, August 25, 2024 6:23:12 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Objection

Jon Sharvill,

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects.)

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This needs to be reviewed immediately!

From:

Sent on: Sunday, August 25, 2024 5:58:09 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Fwd: Attention!

To Jon Sharvill,

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects.)

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From:

Sent on: Sunday, August 25, 2024 5:55:50 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding

To Jon Sharvill,

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects.)

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This needs to be reviewed immediately!

From:

Sent on: Sunday, August 25, 2024 1:16:47 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework

I write this OBJECTING and call on OFGEM to withdraw/pause this consultation on Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects as premature for reasons of:

- its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware.
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- As a priority,, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects share-holder own transmission companies from investment risk and gives the monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them.

- Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION given to environmental, landscape, community or health impacts.
 - ASTI status means electricity bill payers / tax payers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't take factor inflation and has already shot up! . Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque.
 - If TO's delivers their projects by 2030 , OFGEM's ASTI lets them claim full cost – they named their own price on their own project built their own way -free from competition. If another provider company can show how it could get power from A to B quicker, cheaper and with less environmental & community impact, they wouldn't be allowed to compete!
 - OFGEM applied ASTI without it ever being discussed properly in Parliament or in any other public debate. It got mentioned once in Hansard - out of context in a minor debate. OFGEM's 2023 so called public consultation - just like this one- was done in a way that the public had no idea what was happening. With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it a brilliant idea. They have repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening. I
 - IN the real world private, profit -focussed companies BID/ Compete to build infrastructure, - they have to take a risk. They need to raise capital, take risk they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government expecting consumers to pay whatever! . The TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.
 - This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!
 - Public spending must conform to requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to a bunch of those requirements.
-

From:

Sent on: Sunday, August 25, 2024 10:12:02 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

From: 25th August

I write this OBJECTING and calling on OFGEM to withdraw/pause this consultation as premature for reasons of:

- Its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware.
- **OFGEM has a priority duty to protect energy consumers as so OFGEM must NOT enable this nor the ASTI framework NOR ever allow public funds to be spent writing blank cheques to share-holder- owned ,profit-focused transmission companies to pay for projects that these companies scheme up/set their own price on in the first place.**
- As a priority,, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects share-holder own transmission companies from investment risk and gives the monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them.
- Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION given to environmental, landscape, community or health impacts.
- ASTI status means electricity bill payers / tax payers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't take factor inflation and has already shot up! . Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque.
- If TO's delivers their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way -free from competition. If another provider company showing how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!
- ASTI was brought out by Ofgem without it ever being discussed properly in Parliament or in any other public debate. It has been mentioned once in Hansard, out of context in a

minor debate. The 2023 so called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it was a brilliant idea. They have repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening.

- In the real world private, profit-focussed companies BID/ Compete to build infrastructure, - they have to take a risk. They need to raise capital, take risk they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government expecting consumers to pay whatever! . The TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.
- This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!
- Public spending must conform to requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to many of those requirements.
<https://www.ofgem.gov.uk/consultation/proposed-regulatory-funding-and-approval-framework-onshore-transitional-centralised-strategic-network-plan-2-projects>.

From:

Sent on: Friday, August 23, 2024 3:24:53 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Consultation response to Ofgem's 'Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

Dear Mr Sharvill

I support the expectation that TO processes for project planning and development must improve and that TOs will identify and develop the optimal solution.

However you do not set out clearly how the TOs should improve. I believe that Ofgem must at least insist on:

- i. Adherence to Treasury Green Book guidance
- ii. Full project cost transparency

- iii. Publishing of risk registers and worst-case scenarios
- iv. a common methodology for all TOs
- v. evidence of exploration of grid enhancing technologies before building new infrastructure
- vi. discontinue use of 'least worst regret' methodology.

Regards

From:

Sent on: Friday, August 23, 2024 9:54:21 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

Dear Sir,

I write this OBJECTING and callin on OFGEM to withdraw/pause this consultation as premature for reasons of

- its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware.

- OFGEM has a priority duty to protect energy consumers as so OFGEM must NOT enable this nor the ASTI framework NOR ever allow public funds to be spent writing blank cheques to share-holder- owned ,profit-focused transmission companies to pay for projects that these companies scheme up/set their own price on in the first place.

- As a priority,, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects share-holder own transmission companies from investment risk and gives the monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them.

- MY further reasons are:

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION given to environmental, landscape, community or health impacts.

ASTI status means electricity bill payers / tax payers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't take factor inflation and has already shot up! . Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on

other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque.

If TO's delivers their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way -free from competition. If another provider company showing how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by Ofgem without it ever being discussed properly in Parliament or in any other public debate. It has been mentioned once in Hansard, out of context in a minor debate. The 2023 so called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it was a brilliant idea. They have repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening. I

IN the real world private, profit -focussed companies BID/ Compete to build infrastructure, - they have to take a risk. They need to raise capital, take risk they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government expecting consumers to pay whatever! . The TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!

Public spending must conform to requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to a bunch of those requirements.

At this moment in time OFGEM is a disgrace and is only looking after generators and investors with absolutely not consideration to the public.

Regards

From:

Sent on: Thursday, August 22, 2024 9:44:11 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

FAO Jon Sharvill

I write in objection and call on OFGEM to extend and properly advertise this consultation.

30 days online only with no public facing advertising is not a genuine consultation. OFGEM risks repeating the failure of the so-called public consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only **one** member of the UK's 70 million population commented. Most other responses were from vested interests looking to profit from a public utility.

OFGEM's duty is to protect energy consumers/UK citizens. OFGEM should not use public funds to write blank cheques to transmission companies to pay for projects that these companies scheme up/set their own price on in the first place. Despite the clauses about managing subcontractors, ASTI 2023 document is full of caveats about unforeseen circumstances and vaguest threats of penalties. It is written to the benefit of TOs and detriment of UK citizens.

As a priority, ahead of this consultation, OFGEM should revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework 2023 that both protects private transmission companies from investment risk and gives them monopoly status. Conversely, it is all risk and no benefit to UK citizens who consume energy and want to pass on a beautiful, still wild (or rewilded) landscape to future generations.

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION was given to environmental, landscape, community or health impacts.

The wording of the OFGEM's ASTI 2023 document effectively gives these companies a blank cheque. But has no requirement to minimise adverse environmental and community impacts.

OFGEM's ASTI has not been scrutinised in Parliament or in any other public debate. It was mentioned once in Hansard, out of context in a minor debate. The previous consultation was held in a way that the public had no idea what was happening. With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it was a brilliant idea. They have repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening.

Covering Britain in pylons and substations risks scarring our beautiful country for generations to come. OFGEM plans to hand multinational corporations such as 'Scottish' Power blank taxpayer-backed cheques to destroy our countryside.

Private companies should compete to build infrastructure. They should to raise capital, take the risk they make enough money to cover their costs with a fair profit. They should compete to come up with schemes acceptable to the communities expected to accommodate this monstrous equipment. The regulator should be there to protect consumers and rural communities, potentially blighted by powerlines. With ASTI there is no risk, everything is underwritten by OFGEM & UK government, expecting consumers to pay. TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity. And rural communities are left scarred and depleted by pylons: lose/lose.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation or other different options. They don't have a plan, but OFGEM asks the consumers to pay for whatever.

From:

Sent on: Thursday, August 22, 2024 9:37:49 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

CC:

Subject: Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommend

We are writing to lodge our objection to the action currently being taken by OFGEM and calling on them to withdraw/pause the above consultation. We feel it is premature for the following reasons:

- It's failure to conduct truly public widespread consultation both on this proposal - 30 days online only is totally unacceptable. We protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented and the rest of UK's 70 million population were unaware.

- **OFGEM's priority/duty is to protect energy consumers. Therefore OFGEM must NOT enable this, or the ASTI framework. Nor should they ever allow public funds to be spent in what amounts to writing blank cheques to share-holder- owned, profit-focused**

transmission companies, to pay for projects that these companies monopolise and virtually set their own prices!

- As a priority, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework. It unfairly protects share-holder own transmission companies from investment risk. In essence it creates a monopoly status and stifles competition. The consumer loses out because of the lack of competition in the market place. Other investors are discouraged from coming into the market and the companies themselves have little impetus to find more cost effective ways of working. Their interest is the shareholder profits and the big bonuses for the boards of directors – there isn't an hint of altruism in their approach. If the last few years have taught us anything it is that monopoly's don't ever work for the consumer!

In addition;

- OFGEM applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (National Grid, SSE and Scottish Power etc – here after referred to as TO's). However NO CONSIDERATION was given to environmental, landscape, food security, community or health impacts. How can this be right or prudent!
- ASTI status means electricity bill payers/tax payers will pay for the construction regardless of the final cost – our experience is that nothing like this scheme ever comes in on budget, in fact it is always over budget and usually by millions if not billions of pounds! Originally this scheme was estimated at £20 billion but other factor's, like the rise in inflation means this has already escalated well beyond that! Transmission companies can claim 2.5% of the estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has, in effect, given these companies a blank cheque. We wish we could afford to invest in a scheme like this – it's a 'win-win' situation for investors.
- If the TO's deliver their projects by 2030, OFGEM allows them to claim the full cost – ie the TOS name their own price, on their own project, built how they prefer - free from competition. If another provider/company can demonstrate how it can get power from A to B quicker, cheaper, and with far less environmental and community impact, they wouldn't even be allowed to compete!
- ASTI was conceived/implemented by Ofgem without it ever being discussed properly in Parliament, or in any other public debate. It has been mentioned once in Hansard and that was out of context and in a minor debate. The 2023 so called public consultation - just like this one - was done in a way that the public had little or no idea what was happening. With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it was a brilliant idea. They have gone on to use the same formula with this consultation, given a thirty day window for consultations when very few people knew what was happening, where or how. We would have expected much more publicity and information spreading/gathering than this. It just looks as though this was always supposed to 'slip under the radar' for the general population. Thirty days is ridiculous for something of this magnitude and impact.

- In the usual scheme of things, private/profit focussed companies bid to compete for contracts to build infrastructure - *they* understand, and expect, they are taking a financial risk. Frankly, we really can't see that any of them are taking any risk whatsoever – in fact everything is at the expense of the consumer whilst their opinions count for absolutely nothing! These companies usually need to raise capital and that they will eventually make enough profit to cover their costs and accrue a *fair* profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government with the expectation that consumers will be forced to pay, whatever the costs. The TO shareholders have a guaranteed profit. OFGEM will just put the cost of these projects onto the bills of everyone who pays for an electricity supply. Where is the protection for the consumer in all of this?
- This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all focussed on 2030 and beyond, but ESO admit that they don't have a clue what things will look like then. They are planning using a whole spectrum of different scenarios including the use of large amounts of natural gas for power generation, moving to a hydrogen based economy alongside other options. In other words, they don't actually have a plan but it makes no difference because OFGEM dictates that the consumers will/must pay, whatever the outcome!
- Public spending must conform to requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to a bunch of those requirements.

Finally, This whole plan looks like more short term thinking rather than long term planning. The usual waste of public money on an unprecedented scale. This is reminiscent of HS2! Unfinished, badly planned and resourced, and for what? The countryside has been decimated and people's lives ruined. Did it really justify the reckless damage to the environment and people's homes/lives to save a few minutes on a train ride! Even now, when the scheme has been scrapped, it is still under construction to complete the shortened version and even further over budget! That, like this scheme, provides maximum gain to the South of the country whilst all the 'pain' is concentrated in the North. (ie huge pylons, turbines, solar farms, battery storage facilities, huge sub stations and gas powered, hydrogen producing stations etc etc is planned to be inflicted almost entirely on the north of the country – refusing to even consider putting cables underground! The general public were told HS2 would cost X amount of money – clearly that was wrong (therefore badly planned and researched). This scabbled together scheme looks to us like a blueprint for what is to come in this wildly over optimistic, ill thought out strategy for 'not so green' electricity. Our parents used to tell us 'buy in haste, repent at leisure'. The British government, in tandem with OFGEM, seem to be opting for a strategy based on 'jump in with both feet, wearing a blindfold, and hope for the best! We support green energy but not at any price to the natural environment, our enjoyment of it and the financial impact on its' citizens – and not just for our generation but for generations to come.

From:

Sent on: Thursday, August 22, 2024 8:50:06 PM

To: RIIIElectricityTransmission <RIIElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

To: Jon Sharvill

Ofgem Head of ET Investment Strategy

I write this OBJECTING and calling on OFGEM to withdraw/pause this consultation as premature for reasons of:

- its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware.

- OFGEM has a priority duty to protect energy consumers as so OFGEM must NOT enable this nor the ASTI framework NOR ever allow public funds to be spent writing blank cheques to share-holder- owned ,profit-focused transmission companies to pay for projects that these companies scheme up/set their own price on in the first place.

- As a priority,, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects share-holder own transmission companies from investment risk and gives the monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them.

- MY further reasons are:

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION given to environmental, landscape, community or health impacts.

ASTI status means electricity bill payers / taxpayers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't take factor inflation and has already shot up! . Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a

planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque.

If TO's delivers their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way - free from competition. If another provider company showing how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by Ofgem without it ever being discussed properly in Parliament or in any other public debate. It has been mentioned once in Hansard, out of context in a minor debate. The 2023 so called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions, the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course, they all thought it was a brilliant idea. They have repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening.

IN the real world private, profit -focussed companies BID/ Compete to build infrastructure, - they must take a risk. They need to raise capital; take risk they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government expecting consumers to pay whatever! . The TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning to use a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!

Public spending must conform to requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to a bunch of those requirements.

Sincerely,

From:

Sent on: Thursday, August 22, 2024 6:24:57 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by ...

To Jon Sharvill, OFGEM Head of ET Investment Strategy

I write this OBJECTING and callin on OFGEM to withdraw/pause this consultation as premature for reasons of

- its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware.
- OFGEM has a priority duty to protect energy consumers as so OFGEM must NOT enable this nor the ASTI framework NOR ever allow public funds to be spent writing blank cheques to share-holder- owned ,profit-focused transmission companies to pay for projects that these companies scheme up/set their own price on in the first place.
- As a priority,, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects share-holder own transmission companies from investment risk and gives the monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them.
- MY further reasons are:

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO (National Grid, SSE and Scottish Power etc) BUT NO CONSIDERATION given to environmental, landscape, community or health impacts.

ASTI status means electricity bill payers / tax payers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't take factor inflation and has already shot up! . Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit

a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque.

If TO's delivers their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way -free from competition. If another provider company showing how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by Ofgem without it ever being discussed properly in Parliament or in any other public debate. It has been mentioned once in Hansard, out of context in a minor debate. The 2023 so called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course they all thought it was a brilliant idea. They have repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening. I

IN the real world private, profit -focussed companies BID/ Compete to build infrastructure, - they have to take a risk. They need to raise capital, take risk they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government expecting consumers to pay whatever! . The TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!

Public spending must conform to requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to a bunch of those requirements.

From:

From:

Sent on: Thursday, August 22, 2024 6:03:31 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Fwd: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommende...

> Dear Jon

> I write this OBJECTING and calling on OFGEM to withdraw/pause this consultation as premature for reasons of

> - its failure to conduct truly public widespread consultation both on this proposal; -days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware.

> - OFGEM has a priority duty to protect energy consumers as so OFGEM must NOT enable this nor the ASTI framework NOR ever allow funds to be spent writing blank cheques to share-holder-owned, profit-focused transmission companies to pay for projects that these companies scheme up & set their own price on in the first place.

> - As a priority,, ahead of this consultation, OFGEM MUST revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last that protects share-holder-owned transmission companies from investment risk and gives monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing,;

> - MY further reasons are:

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> ASTI status means electricity bill payers will pay for the construction regardless of final cost. It was estimated £20 billion but didn't factor inflation and has already shot up! . Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque.

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From:

Sent on: Thursday, August 22, 2024 4:46:05 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: John sharvil.

Subject:

Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects.)

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In other words instead of profit. Think of this generation and next generation when something new and better comes along (which it will) and the future Human Beings (you know the people you are ignoring for profits) will be left with eye sores of what you built in the name of "green energy" which has NO benefit to our country, yet you are hellbent on destroying.

How would you feel if this was in your back garden? What do your family think of this and your friends (if you have any left that aren't getting benefits from any of this).

Shame on you and all of you who really think that ruining our country side, animal habitats and our wellbeing for profit...

From:

Sent on: Thursday, August 22, 2024 3:57:53 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

Dated 22 August 2024

I write this OBJECTING and call in on OFGEM to withdraw/pause this consultation as premature for reasons of

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Background

info. <https://www.ofgem.gov.uk/.../ASTI%20decision%20doc%20...> <https://www.ofgem.gov.uk/.../decision-modify-special...>

www.ofgem.gov.uk

From:

Sent on: Thursday, August 22, 2024 3:53:53 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by ...

Attn: Jon Sharvill, OFGEM Head of ET Investment Strategy

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From:

Sent on: Thursday, August 22, 2024 3:49:30 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by ...

Attn: Jon Sharvill, OFGEM Head of ET Investment Strategy

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- My further reasons are:

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From:

Sent on: Thursday, August 22, 2024 3:13:24 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

Dear Mr Sharvill, (OFGEM Head of ET Investment Strategy)

I write this OBJECTING and calling on OFGEM to withdraw/pause this consultation as premature for reasons of

- its failure to conduct truly public widespread consultation both on this proposal - 30 days online only is unacceptable. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented when the rest of UK's 70 million population were unaware.

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- MY further reasons are:

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Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque. So we, the public, should have more of a say into what these companies can do with our money.

Regards

From:

Sent on: Thursday, August 22, 2024 1:20:10 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

To: Jon Sharvill

Ref: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

We wish to strongly OBJECT and call on OFGEM to withdraw this formal consultation until it has been suitably communicated widely to the general public and debated with all associated details made public.

Additionally OFGEM must revisit and withdraw or revise the current ASTI Framework as a matter of urgency.

- A 30 day consultation in its current form is not acceptable

- This is a repeat of the previous failure when the 2023 ASTI funding framework was similarly 'consulted' upon, when the UKs wider population were totally unaware of the proposal with the exception of a couple of individuals other than those companies that stood to enormously benefit financially from its approval!

- The previous ASTI framework is having catastrophic consequences for the environment, landscape, communities and health - all issues that were given no consideration by the companies successfully gaining project approvals under the framework

- In addition, the costs of those projects are escalating significantly as they are solely provided by the shareholder owned TOs who know they will recover full project costs at taxpayer expense.

This entire process is ill thought out, takes no account of the consequences on the wider public affected by the projects and removes any incentive for the TOs to apply more current technologies and methodologies. They simply plan to bash out 19th century technology solutions that provide fastest and greatest rate of financial return to their shareholders!

Other nations are so far ahead of the UK in this regard it is embarrassing! We can and must do so much better.

Please halt this consultation until a more rigorous communication of the issues has been held with the wider public and a better mechanism achieved for progressing this critical issue.

We supposedly live in a democracy, yet the financial benefit of overseas shareholders appears to be being secretly prioritised at the cost of the nations most affected communities.

Regards

From:

Sent on: Thursday, August 22, 2024 12:51:33 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

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

In case it isn't clear I would like this email lodged as an objection:

I would like to leave my opinions and comments as an individual.

- There is no obvious collaboration between Windfarm producers, Transmission companies and the Scottish Government to produce a plan which is sustainable, effective and long term, and minimises negative environmental and social impact.

- Windfarm proposals are granted without the owners having to show how they would connect to the grid in the most environmentally friendly way.

- SSEN are not held to the same standard as individual crofters in having to prove how they are minimising peat disturbance and rectifying anything they disturb, with the threat of withdrawal of grants and subsidies.

- SSEN are refusing to provide the entirety of their Scottish onshore transmission plans, instead providing piecemeal proposals in an effort to constrain objections and minimise the negative impact on the entire country.

- Due to the Scottish Government rubber stamping all of SSEN's proposals, all consultations are merely box ticking exercises, with any changes pitiful and meaningless gestures.

- Construction access for any plans are not thought through nor realistic. For example the proposal to use the South and North Deeside Road for construction traffic for the Fetteresso substation does not take into consideration that the South Deeside road cannot cope structurally with existing traffic, let alone construction lorries. The North Deeside Road is impassable for large construction vehicles at Peterculter. Even normal traffic finds it difficult.

- It appears that Central Belt politicians are unable to consider anything practically, rather than theoretically, that exists either North or south of their domain.

Unfortunately I expect my submission to be ignored as all evidence points to the Scottish Government and SSEN ploughing on regardless of actual evidence in an effort to score political points and immediate profit, regardless of the real world consequences, not just to those immediately impacted, but to the entire country.



From:

Sent on: Thursday, August 22, 2024 12:15:17 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM Proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by ...

To Jon Sharvill, OFGEM Head of ET Investment Strategy,

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info. <https://www.ofgem.gov.uk/.../ASTI%20decision%20doc%20...> <https://www.ofgem.gov.uk/..../decision-modify-special...>

www.ofgem.gov.uk

Please acknowledge receipt of this objection.

Thank you

From:

Sent on: Thursday, August 22, 2024 11:17:59 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

To Jon Sharvill, OFGEM Head of ET Investment
Strategy RIIOElectricityTransmission@ofgem.gov.uk

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects (OFGEM proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects.)

Date 22nd August 2024

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Transmission companies can claim 2.5% of estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has given these companies a blank cheque and permission to use funding on alternatives projects.

If TO's delivers their projects by 2030, OFGEM will allow them to claim full cost – TO's name their own price on their own project built their own way -free from competition. If another provider company presents itself showing how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete! OFGEM that's unacceptable - and unlawful!

ASTI was brought out by Ofgem without it ever being discussed properly in Parliament or in any other public debate. It has been mentioned once in Hansard, out of context in a minor debate. The 2023 so called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions the only people responding to ASTI proposal were those with a financial or political interest in covering the country in pylons

and extracting billions of pounds out of the public purse. Of course they all thought it was a brilliant idea. They have repeated the formula with this consultation, 30 days of response window and nobody knowing what was happening. OFGEM is failing in its primary duty to uphold consumers' interests.

IN the real world private, profit -focussed companies BID/ Compete to build infrastructure, - they have to take a risk. They need to raise capital, take risk they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & UK government expecting consumers to pay whatever! . The TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they don't have a clue what things will look like then, they are planning using a whole spectrum of different scenarios including to use large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever!

Public spending must conform to requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to a bunch of those requirements.

I ask OFGEM please to acknowledge received this objection

Regards,

Background info. https://www.ofgem.gov.uk/sites/default/files/2022-12/ASTI%20decision%20doc%20-%20Final_Published.pdf <https://www.ofgem.gov.uk/decision/decision-modify-special-licence-conditions-electricity-transmission-licences-accelerated-strategic-transmission-investment>
www.ofgem.gov.uk

From:

Sent on: Wednesday, August 21, 2024 10:50:32 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Attn Jon Sharvill

Dear Mr Sharvill,

I am deeply concerned about National Grids deeply arrogant behaviour. It does not seem to be at all co-ordinated, what hope that this project is going to be done well. Very little I fear.

Farmers have had their crops trampled by NG employees. Why would anyone think that trampling a crop was ok. Who are the people co-ordinating this? And this before anything starts.

It is super important therefore for Ofgem to take control and make sure NG doesn't get away with doing what they like. They are out to maximise profit, we in the countryside are about to lose beautiful vistas. It's tragic and equally tragic that ofgem does seem somewhat on the back foot.

Yours sincerely

From:

Sent on: Wednesday, August 21, 2024 5:22:09 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Consultation response

Jon Sharvill, Head of ET Investment Strategy

There will need to be rigorous scrutiny by Ofgem, an insistence on transparency, consistency across TO's and a receptiveness to stakeholder input.

Concerns about National Grid's processes on this front since 2022 have been made by Essex Suffolk Norfolk Pylons which I support. These include concerns about transparency, methodology, costings and consultation deficiencies, which have been addressed most recently , including new and reinforced legal opinion, in their July submission to NGET.

Should Ofgem move forward with the proposals for Initial Development Funding set out in

this consultation, it is imperative that Ofgem takes heed of concerns raised by stakeholders, including community groups, about TO processes before allocating any funding. Essex Suffolk Norfolk Pylons are

yet to see and share with the group any indication that Ofgem is scrutinising the work carried out by National Grid

Electricity Transmission (NGET) with respect to the Norwich to Tilbury project and their concerns remain unaddressed.

Of particular relevance to this consultation, these concerns include NGET's costings. They are not transparent, so it is not possible to make true comparisons of alternatives, and, if they cannot make those comparisons, then neither can Ofgem. Consequently, there can be no certainty that consumers(me) will not be impacted.

For example, we know that two very significant costs have not been included in the N2T project costings: community benefits and biodiversity net gain. Not only could these add many hundreds of millions of pounds to the overhead lines cost, but these are not applicable offshore at all, and community benefits are substantially lower for underground options. They understand that the proposed contingency is only 10%, when Treasury Green Book and general large infrastructure project guidance, would suggest that 40% is more realistic.

In addition, when looking at a comparable project, Hinckley, and removing the extra T-pylons cost and scaling up the project, it seems as though N2T has been very significantly under-costed significantly.

Essex Suffolk Norfolk Pylons note that Ofgem does not intend to set an exhaustive list of methods. However, they believe it is essential to set out at the very least a bare minimum of requirements for TOs.

They and myself do not agree with the statement that TO's are best placed to develop projects and I do agree that TO's assumptions are often opaque.

Ofgem must require the following:

Adherence to Treasury Green Book guidance. It is mandatory, after all... Adherence to

the Green Book (across the board, for all projects in the UK) will help to ensure that alternatives are appraised without bias and quantifying impacts.

Transparency, with all costings (at a granular level) published.

Grid Enhancing Technologies. A demonstration by TO's of how they have assessed the opportunities to upgrade the existing grid using Grid Enhancing Technologies before building new infrastructure. It should be modelled on this approach on the USA's recent. FERC order 1920.

A common methodology across TO's.

No more use of "Least Worst Regret" (LWR) methodology. Essex Suffolk Norfolk Pylons submitted a critique of

NGET's LWR approach to Ofgem in 2022.

Publication of risk registers and worst case scenarios.

Consideration of alternatives not in the Centralised Strategic Network Plan 2 (CSNP2)

Essex Suffolk Norfolk Pylons are pleased to see recognition that some alternatives not included in CSNP2 could address network needs and Ofgem's intention to help support TO's to explore whether these can be delivered at lower cost and/or greater speed.

As you will be aware, there are alternatives to N2T that could meet those criteria. Essex Suffolk Norfolk Pylons has been arguing since 2022 that they must be properly explored.

I agree with the uncertainties and risks around project delivery dates, need case and project benefits. It is welcome that Ofgem has asked ESO for analysis to ascertain whether some offshore wind might come on stream later or not at all.

I therefore welcome the proposed flexibility to enable alternatives to be properly explored and I look to see this implemented in East Anglia at the earliest opportunity.

This consultation offers an opportunity to start to build public trust in TO's, the development process and in Ofgem's role as regulator.

I hope to see robust processes put in place

Kind Regards

From:

Sent on: Wednesday, August 21, 2024 3:45:22 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: N to T

Dear Sirs

Dear Sirs

This project and consultation has been a disgrace. Communities and biodiversity/farmers and climate change have not been considered or properly consulted on at all.

Ofgem must insist on National Grid following and providing

- i. Treasury Green Book
- ii. Full project cost transparency
- iii. Publishing of risk registers and worst-case scenarios
- iv. a common methodology for all TOs
- v. evidence of exploration of grid enhancing technologies before building new infrastructure
- vi. no more use of 'least worst regret' methodology.

I trust that you will act on behalf of East Anglia by insisting on the points above.

Yours

From:

Sent on: Wednesday, August 21, 2024 3:12:44 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: N2T disgrace

fao Jon Sharvill

ESSEX SUFFOLK NORFOLK PYLONS WWW.PYLONSEASTANGLIA.CO.UK

Consultation response to Ofgem's 'Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects1',

Consultation contains: proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects. Respond to Jon Sharvill, Head of ET Investment Strategy, RIIOElectricityTransmission@ofgem.gov.uk by 30 August 2024.

Dear Mr Sharvill

We welcome the opportunity to respond to this consultation. Our comments are set out below, and we look forward to seeing these addressed and responded to at the earliest opportunity.

1. Expectations for improvements in Transmission Operators (TO's) processes

1.1. We support the expectation that TO processes for project planning and development must improve. We also welcome expectations that TO's will identify and develop the optimal solution.

1.2. However, there will need to be rigorous scrutiny by Ofgem, an insistence on transparency, consistency across TO's and a receptiveness to stakeholder input.

1.3. As you will be aware, our group has been raising concerns about National Grid's processes on this front since 2022. These include concerns about transparency, methodology, costings and consultation deficiencies, which we have addressed most recently, including new and reinforced legal opinion, in our July submission to NGET.

1.4. Should Ofgem move forward with the proposals for Initial Development Funding set out in this consultation, it is imperative that Ofgem takes heed of concerns raised by stakeholders,

including community groups, about TO processes before allocating any funding. We are yet to see any indication that Ofgem is scrutinising the work carried out by National Grid Electricity Transmission (NGET) with respect to the Norwich to Tilbury project and our concerns remain unaddressed.

1.5. Of particular relevance to this consultation, these concerns include NGET's costings. They are not transparent, so it is not possible to make true comparisons of alternatives, and, if we cannot make those comparisons, then neither can Ofgem. Consequently, there can be no certainty that consumers will not be impacted.

1.6. For example, we know that two very significant costs have not been included in the N2T project costings: community benefits and biodiversity net gain. Not only could these add many hundreds of millions of pounds to the overhead lines cost, but these are not applicable offshore at all, and community benefits are substantially lower for underground options. We understand that the proposed contingency is only 10%, when Treasury Green Book and general large infrastructure project guidance, would suggest that 40% is more realistic.

1.7. In addition, when looking at a comparable project, Hinckley, and removing the extra T-pylons cost and scaling up the project, it seems as though N2T has been very significantly under-costed. Our own calculations suggest that instead of the c£900m cost put forward

1 Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan

2 projects | Ofgem

ESSEX SUFFOLK NORFOLK PYLONS WWW.PYLONSEASTANGLIA.CO.UK

by NGET, N2T will cost between £1.5bn and £3bn. It is impossible to be more specific due to the lack of transparency in figures provided.

1.8. We note that Ofgem does not intend to set an exhaustive list of methods. However, we believe it is essential to set out at the very least a bare minimum of requirements for TOs. We do not agree with the statement that TO's are best placed to develop projects and we do agree that TO's assumptions are often opaque.

1.9. Therefore, Ofgem must require the following:

1.9.1. Adherence to Treasury Green Book guidance. It is mandatory, after all... Adherence to the Green Book (across the board, for all projects in the UK) will help to ensure that alternatives are appraised without bias and quantifying impacts.

1.9.2. Transparency, with all costings (at a granular level) published. (Small things add up when taken over a large project. For example, we hear repeatedly that NGET's survey teams for N2T travel from very far afield and have been known to stay in the most expensive hotel in Ipswich. One landowner guesstimates that the cost to NGET – and hence consumers – of surveys on her land alone, is above £50,000)

1.9.3. Grid Enhancing Technologies. A demonstration by TO's of how they have assessed the opportunities to upgrade the existing grid using Grid Enhancing Technologies before building new infrastructure. We should model this approach on the USA's recent. FERC order 1920

.

1.9.4. A common methodology across TO's.

1.9.5. No more use of "Least Worst Regret" (LWR) methodology. We submitted a critique of NGET's LWR approach to Ofgem in 2022.

1.9.6. Publication of risk registers and worst case scenarios.

2. Consideration of alternatives not in the Centralised Strategic Network Plan 2 (CSNP2)

2.1. We are pleased to see recognition that some alternatives not included in CSNP2 could address network needs and Ofgem's intention to help support TO's to explore whether these can be delivered at lower cost and/or greater speed.

2.2. As you will be aware, there are alternatives to N2T that could meet those criteria. Our group has been arguing since 2022 that they must be properly explored.

2.3. We agree with the uncertainties and risks around project delivery dates, need case and project benefits. It is welcome that Ofgem has asked ESO for analysis to ascertain whether some offshore wind might come on stream later or not at all.

2.4. We therefore welcome the proposed flexibility to enable alternatives to be properly explored and we look to see this implemented in East Anglia at the earliest opportunity. This consultation offers an opportunity to start to build public trust in TO's, the development process and in Ofgem's role as regulator. We hope to see robust processes put in place.

Yours sincerely

From:

Sent on: Wednesday, August 21, 2024 2:31:05 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: FAO Jon Sharvill: Consultation for funding of N2T transmission line

Dear Mr. Sharvill,

I think for any consultation regarding funding of an on shore transmission projects like the Norwich to Tilbury line Ofgem should insist on the following points:

- i. Treasury Green Book
- ii. Full project cost transparency
- iii. Publishing of risk registers and worst-case scenarios
- iv. a common methodology for all TOs
- v. evidence of exploration of grid enhancing technologies before building new infrastructure
- vi. no more use of 'least worst regret' methodology.

I think these points are vital to maintain a balanced approach for any consultation dealing with infrastructure projects of this magnitude regarding benefits and draw backs in establishing the funding requirements.

Kind Regards

From:

Sent on: Wednesday, August 21, 2024 1:57:57 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: F.A.O Jon Sharvill. Consultation submission

Dear Jon

This email is to send you a text version of the consultation response of the Essex Suffolk Norfolk Pylons action group. I would be grateful if you could confirm receipt. Thank you.

Consultation response to Ofgem's 'Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects'

Consultation contains: proposals for a regulatory approval and funding framework for the onshore electricity transmission projects recommended by the ESO as well as proposals to introduce a formalised project scope change governance process for onshore electricity transmission projects. Respond to Jon Sharvill, Head of ET Investment Strategy, RIIOElectricityTransmission@ofgem.gov.uk by 30 August 2024.

Dear Mr Sharvill

We welcome the opportunity to respond to this consultation. Our comments are set out below, and we look forward to seeing these addressed and responded to at the earliest opportunity.

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1.2. However, there will need to be rigorous scrutiny by Ofgem, an insistence on transparency, consistency across TO's and a receptiveness to stakeholder input.

1.3. As you will be aware, our group has been raising concerns about National Grid's processes on this front since 2022. These include concerns about transparency, methodology, costings and consultation deficiencies, which we have addressed most recently, including new and reinforced legal opinion, in our July submission to NGET.

1.4. Should Ofgem move forward with the proposals for Initial Development Funding set out in this consultation, it is imperative that Ofgem takes heed of concerns raised by stakeholders, including community groups, about TO processes before allocating any funding. We are yet to see any indication that Ofgem is scrutinising the work carried out by National Grid Electricity Transmission (NGET) with respect to the Norwich to Tilbury project and our concerns remain unaddressed.

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NGET, N2T will cost between £1.5bn and £3bn. It is impossible to be more specific due to the lack of transparency in figures provided.

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1.9.3. Grid Enhancing Technologies. A demonstration by TO's of how they have assessed the opportunities to upgrade the existing grid using Grid Enhancing Technologies before building new infrastructure. We should model this approach on the USA's recent. FERC order 1920.

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2. Consideration of alternatives not in the Centralised Strategic Network Plan 2 (CSNP2)

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2.2. As you will be aware, there are alternatives to N2T that could meet those criteria. Our group has been arguing since 2022 that they must be properly explored.

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2.4. We therefore welcome the proposed flexibility to enable alternatives to be properly explored and we look to see this implemented in East Anglia at the earliest opportunity.

This consultation offers an opportunity to start to build public trust in TO's, the development process and in Ofgem's role as regulator. We hope to see robust processes put in place.

Yours sincerely

From:

Sent on: Wednesday, August 21, 2024 9:30:01 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

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

I would like to leave my opinions and comments as an individual.

- There is no obvious collaboration between Windfarm producers, Transmission companies and the Scottish Government to produce a plan which is sustainable, effective and long term, and minimises negative environmental and social impact.

- Windfarm proposals are granted without the owners having to show how they would connect to the grid in the most environmentally friendly way.

- SSEN are not held to the same standard as individual crofters in having to prove how they are minimising peat disturbance and rectifying anything they disturb, with the threat of withdrawal of grants and subsidies.

- SSEN are refusing to provide the entirety of their Scottish onshore transmission plans, instead providing piecemeal proposals in an effort to constrain objections and minimise the negative impact on the entire country.

- Due to the Scottish Government rubber stamping all of SSEN's proposals, all consultations are merely box ticking exercises, with any changes pitiful and meaningless gestures.

- Construction access for any plans are not thought through nor realistic. For example the proposal to use the South and North Deeside Road for construction traffic for the Fetteresso substation does not take into consideration that the South Deeside road cannot cope structurally with existing traffic, let alone construction lorries. The North Deeside Road is impassable for large construction vehicles at Peterculter. Even normal traffic finds it difficult.

- It appears that Central Belt politicians are unable to consider anything practically, rather than theoretically, that exists either North or south of their domain.

Unfortunately I expect my submission to be ignored as all evidence points to the Scottish Government and SSEN ploughing on regardless of actual evidence in an effort to score political

points and immediate profit, regardless of the real world consequences, not just to those immediately impacted, but to the entire country.

From:

Sent on: Tuesday, August 20, 2024 9:15:43 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

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

Dear Mr Sharvill,

I am writing on response to the consultation.

We have spent much time providing comments on specific local consultations in East Suffolk – Scottish Power’s EA1 And 2, the Friston substation, Lionlink, Sealink, now Nautilus... - essentially arguing that much more co-ordination is required between project promoters and an integrated offshore grid would alleviate many of the disastrous consequences for the East Suffolk coastline of these projects (on top of Siewell C). So I am confused to discover an entirely different work programme providing taxpayer funds to the operators that claims to be promoting a “holistic” offshore and onshore network plan to which the operators would seem to date to have been indifferent (except now, presumably, for the subsidy). Confused also that the tCSNP2 Network Plan (Appendix 2) shows eg Sealink as “Existing” when there is a whole area of potential development around the international interconnectors and the East Suffolk-Kent-London interconnectors that should be the subject of further scrutiny and government/Ofgem led co-ordination: by leaving these out this framework cannot be considered holistic.

I am deeply concerned that the pursuit of accelerated net zero targets will encourage short-cuts in planning to the detriment of the onshore environment, as the only member of the public to respond to the earlier consultation pointed out.

Trust among consumers/affected residents in the TOs is at a very low level. Offering funding based on a % of their estimated project costs would seem to invite inflation of costings.

A consultation such as this is highly technical, requires a significant amount of prior knowledge and is very challenging for the lay person to master. Yet the taxpayer and electricity consumer are ultimately bearing the proposed costs. It is not clear whether public responses are actually wanted as the complexity of the proposals and the short timeframe make this extremely

difficult. The impression left is that this is an internal dialogue between Ofgem and operators with a veneer of public consultation.

Those of us materially affected by the major programme of transmission development welcome any attempt at co-ordination. Might Ofgem consider co-ordinating the many well organized local groups (such as in our case Suffolk Energy Action Solutions) whose voice needs to be heard as a counterbalance to the industry participants?

Yours sincerely

From:

Sent on: Tuesday, September 10, 2024 10:48:07 AM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Consultation Objection - Framework for Onshore transitional Centralised Strategic Network Plan 2 Projects

Dear Jon and OFGEM Team

Please consider my objection and I request OFGEM pause and re-consider this consultation process.

It is clear from the huge community protests in SSEN's proposals in Scotland to route large, and unnecessary Pylons through all our countryside that our current framework for enabling Projects does not work.

Politicians have been clear that communities **MUST** be engaged in the process to achieve net zero with a just and sustainable transition (which we all support). This has not occurred and the root cause is abject failure of governance, planning and regulation (of which ESO and OFGEM are a part).

We all seek a lean project planning and approval process but IT **MUST** safeguard the people that it is designed to serve. We cannot allow profit-driven operators such as SSEN to impose such unjustified and disproportionate infrastructure on Communities without full technical, commercial, or social-environmental justification, and proper consultation on the solution from concept selection stage.

Quite simply, we have not thought our transmission upgrades and projects through holistically and must stop before it is too late. Our neighbours in Europe already have recognize this, looking to offshore and bury HV electricity transmission.

Specifically,

- OFGEM have failed to conduct a proper consultation. The timeframe is unacceptable. What steps have OFGEM taken to proactively consult with key stakeholders? Can you explain the steps taken and why you consider this fit for purpose?
- OFGEM are failing in their duty to protect energy consumers and communities. The Advanced Strategic Transmission Investment (ASTI) must not enable profit-driven companies to wholly protect them and their shareholders from and responsibility. The ASTI will enable the behaviors I have described above, and not help to eliminate them.
- ASTI does not do enough to guarantee Projects are not sanctioned before technical, commercial, or social-environmental justification and community consultation has been conducted. The problem must be stopped at the root cause.

Furthermore, OFGEM need to work with the new NESO and government to resolve not fit for purpose Laws/Regulation (Electricity Act) and Planning Policy (National Policy Statement for Electricity Networks Infrastructure, EN-1 and EN-5) that enable companies such as SSEN to drive projects such this (<https://www.ssen-transmission.co.uk/projects/project-map/kintore-tealing-400kv-ohl-connection/>) upon our communities, environment and landscape.

From:

Sent on: Thursday, September 5, 2024 7:08:19 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Fwd: Consultation

Thank you for doing the honourable thing and extending the deadline.

I left two important comments off my original email.

We are near Coningsby. Rapid response Typhoons do low flying exercises day and night across the area you are proposing pylons.

Also our tourism is very dependent on the historic, low flying Lancaster, Spitfires etc. These fly across and along the proposed pylon lines.

We are already a terrorist target due to the location of the UK Typhoon response. The pylons and the huge converter stations will make us an even more attractive target for terrorism.

We must look at an off shore integrated grid.

Profit for private shareholders should not be the driver for the grid upgrade.

Yours

From:

Sent on: Friday, September 13, 2024 10:58:17 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

Attention: Jon Sharvill, OFGEM Head of ET Investment Strategy

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects.

I am writing this to OBJECT to the proposals and to call on OFGEM to withdraw/pause this consultation as premature for the following reasons

- its failure to conduct truly public widespread consultation. The publicity has been inadequate and the time period too short. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented whilst the rest of UK's 70 million population were unaware.

- OFGEM has a priority duty to protect energy consumers and therefore OFGEM must not enable this nor the ASTI framework. OFGEM must not allow public funds to be spent writing blank cheques to share-holder- owned, profit-focused transmission companies to pay for projects that these companies scheme up & set their own price on in the first place.

- As a priority,, ahead of this consultation, OFGEM must revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last year that protects share-holder own transmission companies from investment risk and gives the monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them.

- Additional objections include:

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO) including National Grid, SSE and Scottish Power etc. but no consideration is given to environmental, landscape, community or health impacts.

ASTI status means consumer electricity bill payers will pay for the construction regardless of the final cost.

Transmission companies can claim 2.5% of the estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has effectively given these companies a blank cheque.

If TO's deliver their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way -free from competition. If another provider company shows how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by OFGEM without it ever being discussed properly in Parliament or in any other public debate. It was mentioned once in Hansard, out of context in a minor debate. The 2023 so-called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions, the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course, they all thought it a brilliant idea. They have repeated the formula with this consultation, with very few people aware of the consultation happening.

In usual circumstances, private, profit-focussed companies bid and compete to build infrastructure, they have to take a risk. They need to raise capital, and take the risk that they make enough money to cover their costs with a fair profit. With ASTI there is no risk, everything is underwritten by OFGEM & the UK government expecting consumers to pay whatever. The TO shareholders have a guaranteed profit. Ofgem will just put the cost of these projects onto the bills of everyone paying for their electricity.

This consultation is about the successor to ASTI, but OFGEM are still talking about speeding up projects by taking away financial risk for the TOs. This is all about after 2030, but ESO admit that they know what things will look like then. They are plan to use a whole spectrum of different scenarios including to using large amounts of natural gas for power generation, moving to a hydrogen based economy or other different options. They don't have a plan, but OFGEM asks the taxpayer to pay for whatever.

Public spending must conform to requirements of HM Treasury's GREEN BOOK rules saying public money should be spent carefully, legally, openly and with evidence that risk has been reduced as much as possible and the spending should provide benefit to the UK population. ASTI does not conform to a number of those requirements.

As a resident of Echt, I have been appalled by SSENs complete lack of public consultation on the plan for pylons very close to our village. OFGEM must NOT enable behaviour.

Yours sincerely.

From:

Sent on: Friday, September 13, 2024 10:54:26 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects

Attention: Jon Sharvill, OFGEM Head of ET Investment Strategy

Subject: Proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects.

I am writing this to OBJECT to the proposals and to call on OFGEM to withdraw/pause this consultation as premature for the following reasons

- its failure to conduct truly public widespread consultation. The publicity has been inadequate and the time period too short. I protest that OFGEM is repeating its failure of its 2023 so-called consultation on Advanced Strategic Transmission Investment (ASTI) funding framework when only one member of the public commented whilst the rest of UK's 70 million population were unaware.
- OFGEM has a priority duty to protect energy consumers and therefore OFGEM must not enable this nor the ASTI framework. OFGEM must not allow public funds to be spent writing blank cheques to share-holder- owned, profit-focused transmission companies to pay for projects that these companies scheme up & set their own price on in the first place.
- As a priority,, ahead of this consultation, OFGEM must revisit, reconsider and change its Advanced Strategic Transmission Investment (ASTI) funding framework it approved last year that protects share-holder own transmission companies from investment risk and gives the monopoly status, removing the benefits for the consumer of companies required to compete in better ways of working and pricing and competition removed just to protect them.

- Additional objections include:

Ofgem applied ASTI framework to 26 projects for infrastructure pylons/substations etc schemed by Transmission Owners (TO) including National Grid, SSE and Scottish Power etc. but no consideration is given to environmental, landscape, community or health impacts.

ASTI status means consumer electricity bill payers will pay for the construction regardless of the final cost.

Transmission companies can claim 2.5% of the estimated cost of a project as soon as they submit a planning application. This money is awarded on a 'use it or lose it' basis and can be spent on other projects. The actual cost estimates of the projects are decided by the TOs themselves. OFGEM has effectively given these companies a blank cheque.

If TO's deliver their projects by 2030 , OFGEM allow them to claim full cost – they name their own price on their own project built their own way -free from competition. If another provider company shows how it could get power from A to B quicker, cheaper and with far less environmental and community impact, they wouldn't be allowed to compete!

ASTI was brought out by OFGEM without it ever being discussed properly in Parliament or in any other public debate. It was mentioned once in Hansard, out of context in a minor debate. The 2023 so-called public consultation - just like this one - was done in a way that the public had no idea what was happening. With a couple of exceptions, the only people responding were those with a financial or political interest in covering the country in pylons and extracting billions of pounds out of the public purse. Of course, they all thought it a brilliant idea. They have repeated the formula with this consultation, with very few people aware of the consultation happening.

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Yours sincerely.

From:

Sent on: Friday, September 13, 2024 7:49:47 PM

To: RIIOElectricityTransmission <RIIOElectricityTransmission@ofgem.gov.uk>

Subject: Feedback Response to Ofgem's tCSNP2 Consultation Document

Feedback in response to Ofgem's consultation on the proposed regulatory funding and approval framework for onshore transitional Centralised Strategic Network Plan 2 projects:

Dear Mr Sharvill,

I'm afraid, simply writing the title to this response makes me despair of your whole consultation process. I can't make head nor tail of it. You say you are inviting responses from local communities and residents impacted by electrical infrastructure developments, but how realistic can this ever be with such an unapproachable consultation document. I am absolutely certain that well over 90% of the local residents living in East Suffolk where I live haven't even heard about this consultation and yet we are sitting in the middle of an area that is due to become a national energy mega-hub. With plans for construction of one nuclear power station, three super-sized electrical substations and three, if not four, 26m high converter stations, the local population, the economy and the environment will inevitably face severe adverse impacts and we deserve our voice to be heard.

You say you want to be transparent in your consultations, but your consultations are totally opaque. You justify your consultations as complying with the Gunning Principles Test, but I do not accept that your information is accessible, intelligible or enables an informed response. In fact, I feel perfectly justified in saying that the information is inaccessible (members of the population living in impacted areas don't know about it and even if they did, it is almost certain that they simply wouldn't attempt to respond to it), unintelligible (even with a medical degree from Oxford, two MAs and several post-graduate qualifications, I can't understand it properly) and I'm not even going to bother to expand on the reason I don't think it makes an informed response possible. Your consultation cannot therefore serve as a consultation at all – it becomes a statement aimed only at bodies already involved in the industry – a closed shop, box-ticking exercise that sidelines local populations and gives Ofgem the first and last word.

Your consultation may be impenetrable, but my answer to all your consultation questions is easy: It is "No – I do not agree in any way". Therefore, instead of going through your consultation explaining why I disagree with it, I am going to embark on a more general approach to why I oppose National Grid's plans to develop its connection point at Friston and its Sea Link, Nautilus and Lion Link projects on the boundary of the market town of Saxmundham and the rural village of Sternfield when there is a perfectly viable alternative solution to electricity transmission development that is not being given due consideration.

First of all, I would like to address the disingenuous means by which National Grid obtained a consented connection point at Friston. When Scottish Power applied for planning to develop its two substations at Friston, National Grid's connection point was lurking within the application. Despite highly effective valid opposition, National Grid succeeded in sneaking its connection point through without proper scrutiny by the examiners of the cumulative impacts that future connection of multiple projects would have here. Had planning for the two Scottish Power

substations, the connection point at Friston and the converter stations of Lion Link, Sea Link and Nautilus been put before the inspectors in the first place, consent would never, ever have been awarded. And more and more projects – for solar farms and battery storage for example – are currently being added for connection at Friston. Just because planning consent for National Grid's connection point was allowed to get through below the radar in 2020 doesn't mean that all these projects should be allowed to piggy-back their way into existence now.

I accept that Ofgem is tasked with approving plans that will be cheapest to the consumer and clearly, cost to the consumer should indeed be one of the most important considerations, but it is not the only cost at stake. As a profit-making organisation, National Grid is looking for nice big greenfield sites that are cheap and easy to develop whilst generating maximum profits for its shareholders, irrespective of the adverse impacts these projects will have. When we are told that National Grid's plans are the cheapest option, we need to stop and think, cheapest for who? Certainly not a 'cheap' that will translate into lower electricity bills for the consumer. We can't afford to make mistakes with this and developing electrical infrastructure in the wrong place that threatens the very environments we are trying to preserve will cost a lot more than just money.

Ofgem is being pushed by the government to achieve decarbonisation of the grid by 2030, come what may. But this is an unrealistic, over-ambitious and frankly unachievable arbitrary date that is leading to poor short-term decisions being made that will miss out on opportunities with significant emerging technologies. Even Mr Miliband doesn't know what this infrastructure will look like and has invited the ESO to help him make it up as he goes along. In addition, since anyone that's anything to do with electrical infrastructure development and operation in the UK works for National Grid, there is no onshore competition and National Grid has an effective on-shore monopoly that is enabling it to drive the onshore infrastructure development that it wants in the best financial interests of its shareholders rather than considering the infrastructure that the UK needs in the nation's best interests. Better to go for the best option a little more slowly than the worst option immediately.

We have to remember why we're transitioning to renewable energy in the first place. It seems a travesty to be proposing plans that threaten the very biodiversity we are trying to protect in the name of stopping climate change. Offshore wind is offshore – why bring it onshore to Friston and Saxmundham where the construction of such extensive electrical infrastructure is threatening the Heritage Coast with irreversible industrialisation. This argument would carry weight in its own right even if there wasn't an alternative option, but there is an alternative. In fact, there is a perfectly viable, better, cheaper, faster alternative solution in the form of an integrated offshore grid with onshore infrastructure at coastal brownfield sites close to demand. After all, this is what our neighbours on the other side of the North Sea are doing.

Opposition to National Grid's outdated, misplaced, destructive plans is not to deny the need to tackle climate change and transition to renewable energy. Everyone recognises that the North Sea is full of incredible opportunities and trying to utilise these without destroying the Suffolk

countryside is simply common sense. Transition to Net Zero should be a just, fair, carefully considered process that takes into account all aspects of cost and damage. Instead of allowing National Grid to make money out of imposing its outdated onshore infrastructure in the middle of well-established local communities, the UK needs to take a more holistic approach and develop an integrated offshore grid. We are standing at a unique and exciting moment right now to put the UK in charge of the North Sea, as the key player interacting flexibly and optimally with its North Sea neighbours. And instead of the profits from transmission of our offshore wind power going into National Grid's pockets, these could be going straight back into the public purse leading to reductions in cost, not only to the consumer, but also to the tax payer.

Accelerating decarbonisation of the grid by 2030 is leading to political risks being taken with energy security and unnecessary impositions being made on the local population, economy and environment in East Suffolk. Please tell me where the sense is in this? I would not only urge you to reconsider the accessibility of your exclusionary consultation process, but also to look beyond the plans being put in front of you. You have assumed that National Grid is making honest and open planning applications in East Suffolk, but I think it is urgent that you take a look outside the box before the UK misses this unique opportunity to develop a state-owned, strategic integrated offshore grid with onshore infrastructure at coastal brownfield sites that would offer a cheaper, better, faster transmission network fit for future generations whilst at the same time protecting the very environment that we're trying to save.

Yours truly,