

## Response to Shetland Enduring Solution Draft Determination

Q1. Do you agree with our Draft Determination on SHEPD's Shetland Enduring Solution needs case, optioneering and costs?

A1. No.

It appears that SHEPD is exercising its monopoly power in the planned HVDC link and has presented an energy solution which is neither cost effective nor dependable.

The Sullom Voe power station was constructed to ensure that the Terminal had a reliable power supply but is planned to close in 2025 and connect to the local grid. Can an uninterrupted supply for Shetland be guaranteed given the major power surges required for SV i.e. crude oil pumps?

It is acknowledged that, "At present there is no interruption of supply to the Shetland Islands" and yet a BESS replacement solution is planned, costing nearly £100 million over its 10-year life to avoid a loss of supply of up to 45 minutes.

This solution is not for the benefit of Shetlanders who are used to weather related blackouts, but rather to ensure a continued power supply to Sullom Voe Terminal, who have stated BESS is "critical" given the planned closure of its power station.

It is fair and just therefore, that these costs be met by SVT and not borne by the consumer.

The proposed use of BESS provoked considerable local opposition, particularly given the dangers associated with the lithium batteries and BESS's close proximity to housing and businesses.

Q2. Do you agree with our proposal that consumers should not take on any additional costs if the solution fails?

A2. Yes.

The solution being proposed is replacing a system that is dependable and has efficiently served the community over a long period of time and would have continued to do so.

The admissions that this solution "is an innovative, first-of-a-kind configuration" and "there is a possible technical risk that the proposed solution fails to work correctly", do not instil confidence. Would approval for the project have been granted if these admissions had been made at an earlier date?

It appears that SHEPD are content to increase their parent company's shareholders wealth but not willing to risk reducing it.

The consumer is expected to bear the costs of this unwanted project, but it is clearly not the consumer who should bear the costs of failure.

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