Somerset Council Response

Moved to word doc by Megan

The idea for a Regional Energy Strategic Plan/planner is welcomed. We do need a more whole system review and coordinated plan to urgently decarbonise our energy generation, transportation and use for homes, industry, education, health and transport so having a coordinated overview and approach is needed. But should ensure includes representatives from community energy and identify opportunities for co-benefits such as food producing and energy generation combined, power for electrification of transport & local renewable energy tariff for communities along with energy efficiency/retrofit plans to reduce energy waste and unnecessary demand and generation.

Q&A:

Q1. What are your views on the principles (in paragraph 2.8) to guide NESO’s approach to developing the RESP methodology? Please provide your reasoning.  
Support these principles but also suggest adding in be inclusive & support innovation this will also support the intention to be agile.

Q2. Do you agree that the RESP should include a long-term regional vision, alongside a series of short-term and long-term directive net zero pathways? Please provide your reasoning.   
Possibly though may contradict the local vision to be net zero before 2050 as many communities have set different target years – How will these conflicts be managed? How long term would the regional vision be? Short, medium and long term pathways to be included and regularly reviewed and updated.

Q3. Do you agree there should be an annual data refresh with a full RESP update every three years? Please provide your reasoning.

Yes data is rapidly updating & changing so regular updates for the RESP should happen frequently such as annually as suggested.

Full RESP update be possible bi-annually or is 3 years preferable due to the complexity of the work that is required? 4 years is too long and may be affected by the political cycles.

Q4. Do you agree the RESP should inform the identification of system need in the three areas proposed? Please provide your reasoning, referring to each area in turn.

These three areas?  
• Profiles for low carbon technology use (eg electric vehicle charging and heat pump use) and the interactions between these low carbon technologies.

• Consumer behaviour profile changes over time and in response to events (eg, weather and climate).

• Profiles for the growth in flexibility provision, for example Demand Side Response and time-of-use tariffs.

Yes and the profile of demand and supply , technical coordination for broader low carbon technologies including innovation along with parallel retrofit/energy efficiency delivery,  include how EVs could charge and discharge electricity via V2G chargers when parked and plugged in all day/all night. How different types of energy storage can be used linked to wind, solar and tidal.

Local tariffs to support behaviour change and provide for local demand

Smart meters and technology to enable devices to utilise peak generation

Use of local smart grids along with time of use tariffs and demand side response.

Q5. Do you agree technical coordination should support the resolution of inconsistencies between the RESPs and network company plans? Please provide your reasoning.

Yes and to bring together collaboration between DSOs and GNOs – there may be different technical opportunities for GNO to deliver heat networks rather than gas in their infrastructure or where hydrogen is required eg industry and how where and what the DSOs provide the connections to decarbonised the energy supply. Would provide more collaborative solutions to support rapid decarbonisation.

Q6. What are your views on the three building blocks which come together to form the RESP in line with our vision? Are there any key components missing?

These three: modelling supply and demand, identifying system need, and technical coordination – should it include innovation to deliver net zero?

Supply and demand models are key providing meet the needs of the people and changing energy and transport requirements, system need to include system change?, technical coordination to include broader balancing across the broader national network?

Q7. Do you agree with the framework of standard data inputs for the RESP? Please provide your reasoning.   
Not sure – should include Land Use Options, where food and renewable energy/energy storage can coexist, regional growth plans, appropriate locations of energy generation and vehicle charging hubs, support generation for electrification of public transport, opportunities for micro grids and shared heat loop schemes rather than individual heat pumps. And to link with energy efficiency and retrofit improvements.

Q8. Do you have any suggestions for criteria to assess the credibility of the inputs to the RESP?  
Not sure though hope will prioritise decarbonisation with local community benefit, proposals that can combine co-benefits for food growing and biodiversity to be included or charging transport.

Q9. Do you agree with the framework for local actor support? Please provide your reasoning.

Needs to include community energy. Some Councils have worked on a LAEP or local energy opportunities but not all have nor have the budget to do so – must ensure that no community is left out and request Gov helps to fund councils or communities to coordinate a local energy plan if the RESP is not going to support leading on this. Also how to deliver community wide retrofit improvements to reduce the demand profile to make it easier to deliver zero carbon energy from 2030

Q10. Do you agree with the purpose of the Strategic Board? Please provide your reasoning.

Yes for oversight, transparency for regional priorities, steering recommendation and facilitating to support the purpose and with Councils being representatives having either begun to facilitate local energy plans or have regional oversight and engagement - but also needs to include local community energy who have delivered schemes and also engage with their community and share similar decarbonisation ambitions and time scales. The regional geographical definition should be the SW Councils area as all the SW councils have similar constraints, opportunities and communities as well as share same 2 DSOs.

Q11. Do you agree that the Strategic Board should include representation from relevant democratic actors, network companies and wider cross-sector actors in each region?

Yes

Q12. How should actors (democratic, network, cross-sector) be best represented on the board? Please provide your reasoning, referring to each in turn.

Net Zero Hubs should coordinate who in their areas are council reps elected and officers for planning, housing business, transport, community energy, community net zero leaders, high energy users plus the DSOs/GNO. The final decision of who represents local government on each of the strategic boards should be a local decision that reflects the local government structure and organisation in that area and not an arbitrary national decision.

The council should include a land use strategy for identifying opportunities for food and energy opportunities, charging hubs, energy storage, microgrids.

Q13. Do agree with the adaptations proposed for Option 1? Please provide your reasoning.

Yes to amalgamate the Western Gateway and Peninsula STB areas as one as the SW region overall has similar opportunities, constraints and communities as well as DSOs to support the RESP.  SW Councils organisation already exists. Needs to include representatives of community energy in the region

Q14. Do you agree with our assessment that Option 1 is a better solution than Option 2? Please provide your reasoning.

Yes to amalgamate the Western Gateway and Peninsula STB areas as one as the SW region overall has similar opportunities, constraints and communities as well as DSOs to support the RESP.  SW Councils organisation of the councils in the SW already exists. Needs to include representatives of community energy in the region. Though can see there may be merits in Option 2 depending on how those councils collaborate across the DSO areas already which may be similar to the SW region.

Q15. Do you agree a single region for Scotland is optimal? If you think a two region solution is better, do you agree the split should occur at the SSEN and SPEN DNO boundary? If not, please provide your reasoning and alternative option(s).

One region is optional but Scotland’s views on what regional area they believe would work best should be for them to decide.

* **Do you have any comments about the overall process of this consultation?**   
  Only found out about recently on a DSO stakeholder workshop. Was there opportunities to engage in any of the stakeholder workshops for the  RESP consultation? Only had time very last minute to read and respond. Could Ofgem had engaged the DSO’s stakeholder networks eg via Regen?
* Do you have any comments about its tone and content?   
  Tone overall is good, maybe too many acronyms. Mentions national targets – which often contradicts the local/regional targets. Can the first set of pathways be delivered in 2025?
* Was it easy to read and understand? Or could it have been better written?   
  Yes readable though a few too many acronyms
* Were its conclusions balanced?  
  Intension was to be balanced and gave indications of already reflected on feedback received
* Did it make reasoned recommendations for improvement?   
  Yes
* Any further comments?  
  See below

How could this link to the Local Area Energy Plans or similar – the RESP could take on a supporting role to engage/coordinate localised energy planning rather than the local authorities many of whom don’t have the funding or staff availability or expertise to deliver.

How will the RESPs link with areas that haven’t been able to progress any energy planning?

How will RESPs support local net zero ambitions which are substantially sooner than the national 2050 target – our council has set 2030 target date but others have different target dates – where these are different in a region how will the RESP manage this? And now the new UK Gov has set 2030 as the target date for a net zero electricity system for the UK will RESP help to influence the rapid upgrades required to the national infrastructure?

How will the RESP support the integration of innovation and upgrades to low carbon technologies like Vehicle to Grid charging to support load balancing and for demand response?

Does Ofgem set the price of the standing charges which have increased in price exponentially. How will this be managed and ensure customers aren’t paying more for the upgrade works to the national infrastructure to be able to meet net zero urgently?

Can Ofgen update the criteria for connection applications to give more supportive weightings to applications connecting renewable energy generation/energy storage combination, including food and nature,  and deliveref by community energy or includes local community benefit.

Will Ofgem enable a local energy tariff to support a more local demand profile for local renewable energy generators and be a more affordable tariff for the community?