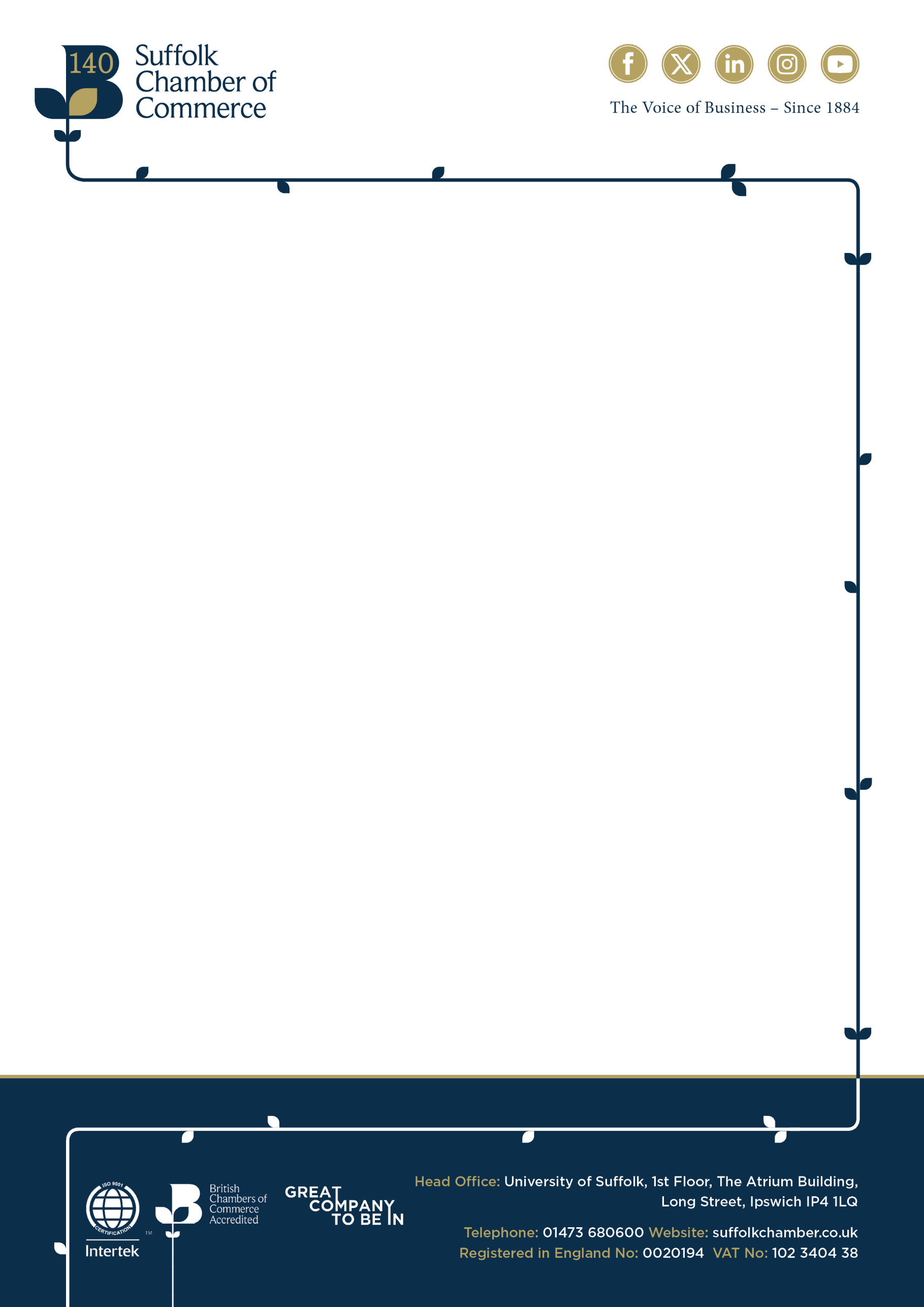
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7th October 2024

Dear Fiona

**Regional Energy Strategic Plan policy framework consultation**

I am pleased to submit a response to this consultation on behalf of Suffolk Chamber of Commerce. I can confirm the response can be treated as non-confidential and can be published on the Ofgem website.

**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**

In the main Suffolk Chamber agrees with the principles. It is particularly important that there is a proactive rather than a reactive approach and that businesses are fully involved in the approach.

It is agreed that a whole system perspective is required and it should be noted that research by Suffolk Chamber has identified hydrogen is of increasing interest to industrial and commercial energy users.

Also, in the context of this consultation, what is more specifically meant by the term ‘place-based’? How is ‘local’ and how will a ‘bottom up’ approach be achieved and be meaningful and credible? Can a place-based approach be achieved given the size of the proposed regions?

**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.**

Suffolk Chamber agrees with a long term regional vision alongside pathways that address more local issues, opportunities (e.g. the potential for hydrogen generation, distribution and use within Suffolk) and differences within a region.

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

Suffolk Chamber does not fully agree.

It is important the RESP is agile but there also needs to be an element of long term certainty, otherwise the RESP is unlikely to stimulate the long term investment that will be needed to implement the RESP.

Therefore, if the long term vision and pathways in the initial RESP are well researched and evidenced, there should be no assumed need for a full RESP update every three years. Effective annual monitoring should indicate if the RESP is on track, what minor amendments might be required to stay on track and when a full update may be required.

**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.**

Suffolk Chamber agrees with the three areas proposed, but considers there should be an additional area focused on profiles for the growth in the use of off-grid energy (hydrogen, wind, hydro, solar panels, AD, local heat networks etc.)

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

Suffolk Chamber agrees. However, if a true whole system approach is going to be implemented there also needs to be technical co-ordination to resolve any inconsistencies in plans for hydrogen networks and heat networks.

**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?**

The three building blocks appear appropriate for the RESP, assuming that the validity of the composition of each block is tested through public consultation.

**Q7. Do you agree with the framework of standard data inputs for the RESP? Please provide your reasoning**

The framework would benefit from some additions, including data on atmospheric emissions (indicating where network strategy could help to reduce emissions) and data on private sector and central government investment in offshore and onshore renewables, hydrogen and nuclear (i.e. locations of significant new energy supply in relation to demand locations).

**Q8. Do you have any suggestions for criteria to assess the credibility of the inputs to the RESP?**

To be credible, statistical inputs should have been well researched and representative; plans and strategies should have been well researched and subject to public consultation.

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

Suffolk Chamber agrees with the framework, it is as would be expected. The critical success factor is the effectiveness of framework implementation (e.g. How does NESO ensure that engagement is transparent and representative.).

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

A strategic board with forums is a common and proven method of developing a strategy. There should be business/consumer representation as well as local government representation.

It is concerning that the consultation document states that the strategic board will not have the final decision-making role in ‘signing-off’ the RESP. In this is the case, there is risk that the strategic board becomes a ‘rubber stamp’ and there is limited community credibility in and ownership of the RESP.

It is also concerning that the consultation document considers that sign off by the strategic board will result in transfer of risk outside of the energy system. The counter argument is that if the RESP is weighted in favour of the energy system it may not achieve the overall purpose of the RESP, as the energy system will seek to prepare and approve a RESP that minimises risk to the energy system, rather than a RESP that supports the economic, social and environmental wellbeing of a region (i.e. There is unconscious bias on the part of the energy system.).

**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?**

RESPs are intended to provide a single coherent view of demand. Therefore, as well as democratic and network actors, strategic boards should include demand side representation - in particular business representation (board members could be nominated by business representative organisations, such as chambers of commerce).

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

Board members representing businesses could be nominated by business representative organisations, such as chambers of commerce.

It is for local government and network operators to determine how they should be represented.

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

Suffolk Chamber welcomes the proposal that Option 1 does not result in any blending for the Transport East region and that RESP for the East will be based on a region made up of Essex, Norfolk and Suffolk.

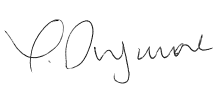
**Q14. Do you agree with our assessment that Option 1 is a better solution than Option 2? Please provide your reasoning.**

Suffolk Chamber agrees that Option 1 is a better option for Suffolk. The East of England ITL 1 region is not a coherent region in socio-economic terms.

**Q15. Do you agree a single region for Scotland is optimal? If you think a tworegion 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).**

Not applicable to Suffolk

Yours sincerely



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Suffolk Chamber of Commerce

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