[Regional Energy Strategic Plan policy framework consultation (ofgem.gov.uk)](https://www.ofgem.gov.uk/sites/default/files/2024-07/Regional_Energy_Strategic_Plan_policy_framework_consultation.pdf)

*Response from Dr Simon Waldman, Assistant Professor in Energy Technologies at Heriot-Watt University. This response is in a personal capacity. I do not require my response to be confidential.*

***1. 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.***

I agree with the principles in 2.8, but believe that these cannot possibly be achieved while all of Scotland is a single region. It can't be "Place-based" or "reflect a region's characteristics" while covering places that are more than a full day's drive apart, with situations ranging from inner cities and industrial parks to remote islands. The "whole system" elements will include areas with gas grids and areas without gas or electrical grid connection that rely on diesel generators, and whose largest energy vector is fuel for ferries.

***2. 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.***

Q2: I agree with the long term vision accompanied by short and long term pathways, for the reasons given in 3.13-3.14. I note that a short-term pathway with a five year time horizon cannot reasonably be expected to "deliver net zero" as stated in 3.8; this should surely only apply to the 25-year pathways (although short-term ones could be asked show that they are consistent with this longer-term requirement). Note that regional pathways may not being able to deliver net zero in isolation from wider national initiatives and policy.

The language of "energy needs across the region" mentioned in 3.6 should reflect supply as well as demand. At the moment this is written in the language of predicting changes in demand and does not mention future supply opportunities which can be limited or prevented by grid constraints.

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

I have some concern about the scale of the "full RESP update" exercise and the costs and workload that this might impose on local authorities and others. Perhaps this should be set at five years to align with the short-term pathways, rather than getting out of sync with them?

***4. 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***

In principle this seems reasonable, but at the moment I disagree because of the issue of scale noted above: A "Scotland" region is far too large and diverse for this process to be effective.

In 3.21 I am cautious about "a set of common assumptions to be used across all regions" - this is fine as a default, but regions should be able to challenge these on local grounds.

***Quesitons 5 & 6:*** *No comment.*

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

Yes, subject to the concerns set out above that a "Scotland" region may be too large and diverse for this process to be effective.

***Questions 9-12:*** None of this seems practical with a “region” that includes all of Scotland – it is simply too large and diverse to include all appropriate representation.

***Questions 13-14:*** No comment.

***15. 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)***

No. At \*least\* two regions are required due to the scale and diversity of Scottish energy geographies. Although, as the consultation notes, other regions are also diverse, they do not have the same range of situations that are exhibited in Scotland, nor the same level of strategic importance in their renewable energy potential. I cannot think of any particular reason that the populations of the chosen regions need to be similar, and thus do not believe this should be a constraint.

If only two regions are possible then the SSEN/SPEN DNO (and TNO) boundary is a plausible and convenient one, in that it would separate the highlands and islands from most of the most densely populated areas. It must be appreciated that there would still be great diversity within each region, and that the diversity within the SSEN region would probably still be greater than in most, if not all, of the English zones: it would range from sizable cities with mains gas, to islands with weak or no electrical grid connections and whose largest energy vector is fuel oil for ferries, yet which have enormous strategic potential for renewable energy. There is a risk of the voices of these latter, less populated, areas, being lost.

It is notable that all of the maps included in the consultation document, including those delineating the proposed boundaries of the Scottish Region(s), omit Orkney and Shetland – two counties and local authority areas which are likely to be among the most important for renewable energy supply in the next thirty years and beyond. This should be corrected!