Consultation – Regional Energy Strategic Plan policy framework

Response from J Robin Aitken (not confidential) 8th October 2024

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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.

Unfortunately “Place based” brings with it conflicts between areas where strategic planning priorities will differ significantly. The key difference in the “green clean energy net zero” scenarios are between “town & country” where private & foreign developer driven energy production (from wind turbines & solar PV) mainly on good Best & Most Valuable Agricultural Land (BMVAL) will inevitably conflict with (the major) urban energy demand requirements. A compromise here is to **maintain** the onshore wind ban (i.e. limit wind to more cost efficient large offshore wind NSIPs) and incorporate the CPRE proposal to utilise all available rooftop areas for solar PV rather than agricultural land. Much of Scotland & Wales natural environment has already been very effectively “destroyed” by the unholy alliance / alignment of ((mainly) foreign investors (for profit), local landowners (for guaranteed rental income) and the devolved administrations that are being driven (excessively) by so called “green politics” & very local political economic development and employment objectives.

I would fully support a “whole system” regional strategic planning approach to support NESO. This should include not only gas (including hydrogen as well as methane), electricity generation from (short term intermittent, unreliable, variable & volatile mainly rooftop solar PV and better performing offshore wind but **NOT** inefficient / opportunity cost ineffective onshore wind), clean zero carbon nuclear (large NSIP type projects Hinkley C & Sizewell C together with at least 25 4th Gen small modular reactor projects (300 – 400MWe SMR) at ALL existing legacy sites (coal & nuclear) with extant grid connections and more than sufficient grid capacity. The legacy peak electrical grid power supply was over 60GWe in 2007 declining to around 45GWe by mid-2024, there is more than sufficient extant overall grid capacity to meet expected electricity demand growth in the medium term. The current “grid problems” arise from **excessive and unrealistic** UK emphasis on (foreign developer / investor led) intermittent and unreliable offshore wind (15GWp already installed capacity), onshore wind (15GWp already installed capacity) & solar PV (15GWp already installed capacity) projects in pursuit of politically driven (rather than technically driven) emission reduction objectives. Whole system should also include maintenance of existing natural gas combined cycle turbines and biomass power generation (mainly Drax). Non generating (highly dangerous Lithium-ion) Battery Energy Storage Systems (BESS) and pumped storage hydro allow (evening) peak shaving but “arbitrage trading” should NOT be a primary objective/opportunistic goal of these “zero net sum” investor driven projects.Minor local contribution may arise from tidal/current/wave hydro power generation. As regards heat (domestic & commercial) NESO should be pushing “insulation” and small local 4th Gen nuclear community heating projects as well as transition to blue/green/gold hydrogen. Transport transition is problematic EVs/hybrids are NOT popular for a number of reasons not the least of which is cost and the relative longevity of existing ICE vehicles. The UK population will maintain the current freedom provided by the private vehicle for as long as possible. ICE biofuels / hydrogen and hydrogen fuel cells probably offer a more viable strategic planning path than EVs alone. Heavy diesel (goods & agriculture) is likely to be required for some considerable time. Much UK manufacturing industry power demand has already been exported (mainly to China & hence at least part of the fall in overall power demand despite (in 2023) record UK population growth since 1971). The remaining large energy consumers are politically problematic (e.g UK iron & steel). Regional plans would highlight these issues and hopefully offer possible strategic alternatives.

NESO plans are NOT vision led. The main objectives are set by the IPCC and set in law by the UK Government. The UK Climate Change Committee oversees progress towards these objectives. For RESP “scenario led” medium term strategic planning (as outlined in Consultation 3.12 page 23) tends to offer a more balanced approach than a so called “vision led” approach. This is more appropriate in respect of firmer technical objectives rather than “softer” political objectives. The problem with “vision led” strategic planning is – “Whose Vision” ? Political vision unfortunately could vary wildly in the short term with the government of the day (as we see only too starkly following the recent 2024 General Election). Currently “Green politics” / private foreign investment holds sway in the face of the real (cost effective) technical realities and requirements for a 99.9% reliable 24/7/365 energy system. It can also lead to the dominance of “wrong projects” such as (Labour’s Lord Adonis promoted) HS2 that are totally inappropriate as UK public investment aspirations (a “political challenge” of 150mph on the existing/ de-bottlenecked / upgraded rail network would be perfectly adequate). Foreign investor solely profit-driven “vision led” projects are equally problematic.

Being “proactive” in the development of (and investment in) the energy system needs a clear (and technically appropriate) strategic direction. It also requires sufficient and appropriate resources to achieve it. Proactivity for its own sake serves no real purpose whatsoever and can lead to “distracting” organisational behaviours diverting from the main RESP/NESO objectives as successive middle and senior managers feel obliged to “make their marks”. See also comment on strategic versus tactical planning cycles in Q3 below.

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.

As mentioned above “regional scenarios” would be more appropriate than “vision”.

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

The RESP should be updated every five years (in line with “normal / routine” political change). Three yearly update would mean the RESP process was merely “tactical” rather than “strategic”.

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

Consistent assumptions are critical to coherent strategic planning.

The tools required for presentation of the Spatial Context for energy capacity supply & demand needs analysis should clearly be improved and harmonised although net zero **within** the individual regions comprising the UK as a whole should NOT be an underpinning objective some regions will be net zero carbon positive others will be net zero carbon negative.

Strategic Network investment decisions should be made taking into account the full range of socio-economic and political factors (planning balance, investment sources, energy reliability & security and reasonable expediency). The UK is NOT a significant / major contributor to global carbon emissions / climate change and we do NOT need to pursue (mainly foreign) investment seeking a “safe haven” at the expense of other equally important national considerations. The achievement of net zero carbon in the UK will not make the slightest difference to global CO2 levels.

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

The achievement of net zero carbon and then zero carbon across all energy vectors will require fully consistent technical coordination at all levels of the planning process.

6. 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?

Modelling supply & demand (under different scenarios), identifying the system needs to achieve the required energy balance and providing the necessary technical coordination to achieve the objective effectively are all crucial to an effective and achievable RESP. The missing ingredient is ensuring that a “score card” that records all stakeholder interests is also developed and monitored during implementation.

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

Data sources appear reasonable.

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

Consultation 3.52 page 31 describes a key issue in the credibility the RESP process with respect to developers / investors in intermittent renewable energy projects (wind & solar PV) who are happy to invest when Contracts for Difference prices are maintained at high levels in successive Allocation Rounds and large amounts of wasteful and very costly over-investment in ”plate capacity” is actively encouraged by the UK Government in pursuit of purely political goals. This is particularly so for the UK northern climate particularly in the winter when energy demand naturally increases and renewable supply is highly variable.

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

No particular comments.

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

No particular comments

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

Agree with this proposal.

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

No additional comments.

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

No comments.

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

A blended Sub National Transport Board (STB) and International Territorial Level (ITL 1) (Option 1) would appear to be most appropriate.

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)

A single region for Scotland would appear to be most appropriate.