

Ms Fiona Campbell
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

Enquiries to: Phil Watson Strategic Energy
Projects Manager

Email: phil.watson@suffolk.gov.uk

resp@ofgem.gov.uk

Date: 08/10/2024

Dear Ms Campbell,

Regional Energy Strategic Plan policy framework consultation

Suffolk County Council welcomes this opportunity to engage with this important consultation, which will shape how decarbonisation of both the electricity system and the wider energy system is delivered. Furthermore, if it can be managed effectively, it has the potential to mitigate the adverse impacts of new infrastructure, and foster growth and economic resilience, that will be a benefit to both the rural and urban communities of Suffolk.

Suffolk County Council's detailed response to the consultation is set out in the appendix to this letter, however, there are two key issues which the Council would like to emphasise in relation to:

- Democratic bodies and governance
- The need for clarity, around the role of local government, and new burdens

Firstly, Suffolk County Council welcomes the prominence and recognition of the role of democratically accountable bodies in Regional Energy System Planning, and fully supports this. The County Council recognises that the regulator and the National Energy System Operator, in seeking to create a robust and agile governance structure, have suggested that where unitary and combined authorities are not present, county councils should be the lead local bodies on the strategic boards.

It is essential that the regulator and the energy system operator recognise that this will create considerable challenges for local authorities, regarding governance, transparency, and fairness, given the necessity to ensure that lower tier authorities (district and borough councils) are properly, effectively, and meaningfully included in the process, such that county councils can represent their views and concerns effectively to strategic boards. Furthermore, the regulator should also recognise that district and borough councils are the prime movers in relation to the allocation of land for housing development and industrial/employment land, and consequently are the

principal driver for the expansion and modification of the low voltage network. Suffolk County Council's initial and preliminary view is that an effective framework for governance and cooperation between local authorities will be essential on these issues, and that the waste partnership model may provide an appropriate starting point; given the apparent division of responsibility between the tiers of local government on that issue appears to be similar to what might be expected in relation to energy system planning.

Secondly, the consultation document recognises that the position of local government in relation to energy system planning, as envisaged by the regulator, does not have a firm basis in regulation or statute, therefore, the County Council asks that Ofgem work with ministers to resolve this. Suffolk County Council considers that this is particularly important, both to clarify the status of relevant local authorities in relation to energy system planning, and to clarify the status of energy system planning as a new burden which they're being asked to undertake, in relation to their statutory duties.

Principal local authorities, such as unitary authorities and county councils have a range of critical statutory duties, particularly in relation to children and young people and health and social care, which dominate the allocation of resources. Therefore, to ensure that funding is made available for energy system planning, which is a government priority, given the drive to decarbonise the grid by 2030, clarity regarding the status of energy system planning, is essential.

Suffolk County Council will seek to work constructively with its partners, to create a system of engagement and governance, suitable for an area with two tiers of local government. The Council would welcome discussions with the National Energy System Operator as soon as is appropriate, to inform that development. The County Council considers that this early engagement with the system operator is essential, given the complexity and sensitivity of energy infrastructure issues in Suffolk. Therefore, the County Council looks forward to working constructively with all parties locally, and nationally, to develop effective Regional Energy System Planning in Suffolk.

Yours sincerely,



Richard Rout

Deputy Cabinet Member Nationally
Significant Infrastructure Projects

Appendix

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.

The proposed principals to be used in developing the methodology appear to be sound and comprehensive. A whole system approach that is vision led and proactive, and which responds to the needs of place, is likely to be robust.

The vision led approach to system planning implies reaching agreement between all parties on this vision, clearly recognise the partnership working that will be necessary to navigate for the various economic, social, and environmental priorities that various organisations might have. Therefore, this principle should be modified to reflect the necessary collaboration, i.e.:

*Be vision-led – provide a clear long-term objective for energy system development that reflects a region's **economic, social and environmental** characteristics and sets agreed priorities for the region **through partnership working** while ensuring alignment with national priorities.*

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.

It is essential that a long-term regional vision is developed alongside short and long-term pathways to Net Zero, to provide a conceptual framework for the shorter-term planning cycles.

The proposal for a single short-term pathway will help create investment certainty to meet immediate decarbonisation challenges.

The County Council supports the proposal for a series of longer-term pathways to allow evaluation across a range of futures and it essential that these align with the 2050 Net Zero target.

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

To respond to the emerging needs and opportunities of connection offers and demand, an annual refresh is essential, and given the speed and complexity of change a full update every three years is probably unavoidable.

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

The spatial view of the RESP, and its role in identifying the location of strategic investments, is appropriate. It is also agreed that there should be a common set of assumptions used across all regions.

There is likely to be variation, within and between regions, that will affect how consistent assumptions are, and their credibility. The spatial context for capacity needs will be affected by the economic characteristics of each region, particularly clusters of business activity. Other infrastructure investment will also affect strategic network investment, and future economic characteristics.

Of the three factors proposed at paragraph 3.2 1, it is also suggested that the location of strategic assets and investment, should be properly and demonstrably cognisant of physical and functional risks to the infrastructure, and the need for it to be resilient to the impact of a changing climate.

The County Council supports the proposal for a spatial view of demand and growth projections to show where additional network capacity is needed and/or where the network has headroom. This will be crucial in supporting DNO's/DSO's to appropriately direct their network investment.

The County Council supports the proposal for the RESP to take a more directive role, in identifying the location for strategic investments in line with the long-term vision for the region. This will help support efforts to unlock private investment in system transformation.

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

It is agreed that technical coordination is likely to be essential to resolve these inconsistencies and will need to be appropriately programmed.

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?

Given that the location of strategic investments will be informed strongly by the long-term vision for the region (3.23), there needs to be a periodic back check and review of that long term vision as part of the operation of the RESP. Given that it is proposed for the RESP to have a full review every three years It may be appropriate for the long-term vision to have a review every 10 years?

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

The proposed framework for standard data appears to be generally appropriate and is likely to provide the necessary information to inform decision making.

The reference to plans and strategies under local government data is welcome with the framework set out in table 2. However, there is a difference between data and strategy sources and this box should be subdivided to reflect that.

Also in Table 2, it is suggested that “Net zero targets” should be amended to, “Net zero targets and area-based climate action plans”.

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

Consistency of data between authorities will be a feature to which the RESPs will need to navigate with the support of regional partners such as water companies. Spatial economic data, such as Business Register and Employment Survey (BRES), is nationally consistent and will be vital in setting out the economic characteristics.

Translating plans and strategies into credible forecast data will be a significant task, that the RESPs could undertake through an alignment programme, seeking standardised inputs on future housing (e.g. by number of bedrooms), employment growth (e.g. by four-digit Standard Industrial Classification Code) and trip lengths (by transport mode).

The current government’s proposed alteration to national housing targets means there will be a need translate the headline figures, for each district, into household characteristics and population data. This process will need national co-ordination.

In terms of credibility criteria: the extent to which plans and strategies are based on robust forecasts, from nationally consistent sources; and the clarity and certainty of spatial arrangements within a region, would both be important indicators of credibility.

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

The framework proposed for supporting local actors is acceptable. However, as identified at 3.63, there is likely to be a gap between the needs of Regional Energy System Planning, and the duties and available resourcing & funding of local authorities in this regard. Therefore, clarification from government for the relevant local authorities, and their partners in a locality, is required.

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

The proposed purposes of the Board to oversee the development of the RESP, and to make recommendations at key stages is appropriate, as is the fact that it is proposed that NESO will be the final arbiter, to ensure consistency nationally.

There is a clear need to improve the alignment of energy system and spatial planning, so the proposal that the Board provides a forum for collaboration, and support for whole system planning, is welcomed.

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?

To command greater public confidence and trust, democratic actors and wider cross sector actors need to be included on the strategic boards, along with network companies.

As an upper tier authority, the County Council recognises that the proposed structure means that it will be a convening body, with NESO, to ensure the effective representation of lower tier authorities in the process. It is also recognised that board representatives will need to have the relevant expertise, and authority, to represent their organisation, and this is therefore likely to require consideration of governance and process within democratic organisations participating on the Strategic Board.

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

Suffolk County Council agrees the embedded model, which integrates technical actors and those with a democratic mandate, is the appropriate approach. This model is likely to facilitate more effective communication and mutual understanding of different perspectives, which the siloed approach of multistage working could not be expected to engender.

The County Council recognises the significant duty placed upon it by the proposed structure; to collaborate, support, and engage effectively, with lower tier authorities, and to properly and robustly represent their views and concerns, both to the other strategic board members and during participation in any working groups.

Consideration should be given to supporting the technical knowledge of local democratic representatives, and resources will need to be made available to support their participation.

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

The blended approach to the development of option 1 is appropriate

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

Suffolk County Council considers that option one appears likely to be a smaller and more coherent region than the alternative set out under option 2. Furthermore, specifically for the East, it mirrors both the ongoing collaboration between local authorities in the region, and this region has a shared set of issues, in relation to transmission, generation and distribution infrastructure.

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)

Suffolk County Council has no comments on this