

CUMBERLAND COUNCIL RESPONSE TO CONSULTATION ON A POLICY FRAMEWORK FOR REGIONAL ENERGY STRATEGIC PLANS

Introduction

Cumberland Council welcomes the opportunity to comment on the proposed introduction of Regional Energy Strategic Plans (RESP) and the arrangements for preparing and updating them. We would be pleased to participate in a Strategic Board overseeing production of a RESP for the North West region. The following response to the consultation questions has been developed by officers with responsibility for planning and energy matters and agreed with the relevant Executive Council Member with portfolio responsibility for the economy and energy.

Responses to Questions

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.

We are satisfied the four guiding principles proposed are appropriate to enable effective consideration of the energy needs of a region and for the outcome of that place based analysis to influence the outcome of strategic investment decisions. We agree with the point made at paragraph 2.4 that the GB policy framework should be implemented in a way that properly reflects different local circumstances and the specific characteristics of a particular region, taking account of both existing needs and future opportunities.

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.

Yes. The arguments set out in paragraph 3.11 make a compelling case for the proposed approach of establishing a long term regional vision. This should provide the framework within which shorter term plans for

investment can be devised and enable plans to be adapted appropriately to reflect developments. It appears feasible that a long term vision for a region could be a relatively simple document based on a standard set of assumptions about what actions an area with particular features and characteristics is likely to need to take to achieve Net Zero.

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

We have no basis to challenge the proposed update cycle (which the document suggests is best aligned with the cycle for updating the Centralised Strategic Network Plan) and will defer to those with relevant expertise in energy sector planning. However, we would request that the annual data refresh process should be designed to minimise administrative and resource burdens on the parties involved.

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.

Yes. There seems a strong case for the proposed approach which should provide for a strategic overview of overall system need in a region, building on the individual Network companies own analysis of capacity needs and demand forecasts. It should enable better informed decisions about the timing and location of specific infrastructure investments. The process of identifying system needs should include an explicit requirement to consider the particular needs of rural and remote places to protect against these being overlooked in favour of areas of higher energy demand.

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

Yes. It makes sense to give the NESO a formal responsibility to identify opportunities to achieve more effective and efficient outcomes for a region's energy system as a whole.

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?

We have no suggestions additional to the building blocks set out in Table 1 on page 21 but would reiterate the point that the process should include stages at which the particular needs of rural and remote areas are taken into consideration.

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

Yes.

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

No but it seems appropriate to give greater weight to data collected by a responsible body in the course of performing a formal function than on data produced for other purposes.

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

Yes. The proposed framework enables all relevant actors to input to production of a RESP while maintaining a manageable structure. We welcome the proposed support measures set out in paragraph 3.56 which should help Local Authorities develop their capabilities in producing relevant local plans and contribute effectively to development of the RESP.

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

Yes. We are satisfied that the Strategic Board should oversee and steer preparation of a RESP but should not have final decision making

responsibility for the finalised RESP with that duty resting appropriately with the NESO in view of its responsibility for delivering a coherent and consistent GB wide strategic plan.

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. We agree that the Strategic Board should be based on the embedded model and have the lean membership proposed with other parties engaged effectively through appropriate local arrangements such as Working Groups.

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

We agree it is appropriate for the Strategic Board to consist of Tier One Local Authorities and the Network Companies. This will provide for a manageable Board able to take responsibility for agreeing conclusions. Appropriate engagement arrangements such as Working Groups should be established locally to capture input from other interested parties such as business and academia.

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

Yes. The outcome for the North West region represents a sensible balance, splitting the Transport for the North area into east and west. There will inevitably be differences between component parts of each of the 11 identified regions. The North West region will include major centres of population as well as sparsely populated rural areas. It will be necessary to ensure a RESP properly reflects those different aspects of a region.

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

The arguments presented in favour of proceeding with Option 1 over Option 2 appear reasonable and we have no basis to challenge the conclusion.

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).

We have no basis to challenge the arguments presented in favour of the proposed single region for Scotland.