

This is the joint response of Babergh District Council and Mid Suffolk District Council to the Ofgem RESP consultation

Consultation questions:

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.

These are a solid foundation for the development of the RESP. Responsiveness is especially important to ensure the RESP is flexible enough to adapt to changing technologies and demands in an already fast-moving area.

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 critical that the RESP responds to the projected growth and priorities of the relevant authority areas within the RESP boundary so the short and long term visions should respond to the context of the area.

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

It is important the RESP is regularly reviewed to ensure it is responding appropriately to need.

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 appear to be a reasonable foundation for contributing to the identification of system need provided they are responsive to change and easily updated.

The visual medium for the spatial context of capacity needs will be incredibly helpful, especially if shape files can be shared with LPAs so that this data can be used for other planning functions. Again, this will need to be appropriately maintained to ensure it is a reliable source.

The directive role in informing strategic network investment is a significant role of the RESP in ensuring a long-term vision for the coordination of project delivery across the generation, storage, transmission, and distribution vectors

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

Yes. It is critical that regulatory or procedural 'gaps' do not become barriers to effective and efficient delivery of a coordinated strategic approach to the RESP outcomes.

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?

Providing the RESP is approached in a way that is flexible and responsive to changing circumstances so as to achieve the best outcomes the three building blocks are considered to be a reasonable foundation for the RESP.

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

Largely, yes. However, there should be due consideration given to conflicting policy objectives, for example, the impacts of energy development on residents, biodiversity, landscape, heritage, the local economy and food security. Local Plans, including Neighbourhood Plans, should provide relevant information in this respect but regard should be had to the age of the local plan and its alignment with national policies, statements, and priorities.

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

We suggest a regular top-down check of inputs to ensure they remain in date and in accordance with the current national government position.

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

The principle of the framework is welcome. It would be extremely valuable for the RESP to also facilitate the coordination of stakeholder objectives and outcomes where, for example, asset sharing and / or delivery harmonisation, would result in greater efficiencies and lesser impacts on communities and environments.

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

The proposal seems reasonable. There should be clarity as to responsibility for conflict resolution between stakeholders.

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?

Yes, it is important that the Strategic Board includes representation of the interests, objectives and priorities of all stakeholders and affected groups in the RESP area. Representation will need to be flexible and responsive to evolving issues and need.

The embedded model would have less risk of mis-communication and would present greater opportunity for fully representative dialogue.

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

Democratic: Babergh and Mid Suffolk District councils are district authorities in a two-tier authority county. Whilst we have a good working relationship with colleagues at Suffolk County Council, National Grid ET / ESO and UKPN as well as a number of iDNOs, we feel the interests, priorities and strategic inputs of the districts would be best represented by district officers. District authorities have responsibility for planning and have a key role in supporting our communities' aspirations for achieving energy efficiency, deployment of renewables and the development of community energy projects. Local authorities are usually significantly under-resourced so to expect County officers to be fully conversant with the myriad and complex strands of district work and priorities would be unreasonable and unachievable. Full representation also removes any risk of political bias of the Strategic Board.

Network: It is important for a representative of network stakeholders are members of the Strategic Board to ensure open dialogue and to ensure opportunities for coordination and creative solutions are identified and pursued appropriately.

Cross-sector: Invitations to the Strategic Board should be as broad as practicable with the flexibility for stakeholders to agree amongst themselves how they are best represented. There

should also be flexibility for this to change and evolve in response to changing need and other conditions.

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

For manageability, Option 1 is agreed. There should however be measures to ensure effective dialogue between neighbouring RESP areas, such as East of England and Heat of England, as well as an all-RESP areas forum for knowledge sharing and learning.

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

Option 1 is likely to be more manageable.

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 comment