

**Ofgem - Regional Energy Strategic Plan policy framework consultation**

*The East Anglian Alliance comprises an informal association of amenity groups, countryside organisations and community representatives in Essex, Norfolk and Suffolk.*

*While each group has specific interests in relation to Ofgem's consultation, they share common concerns about potential impacts on the region's communities and countryside.*

Many of the objectives set out in the RESP policy framework seem self-evidently reasonable and necessary.

The consultation document touches on the current lack of co-ordination at local level and the absence of good quality data. In practice, local authorities and utilities – with the possible exception of some electricity distributors – do not even have accurate detailed records of the location and condition of their assets. A coordinated local approach is necessary but is starting from a very low baseline.

We commend the emphasis on place-based engagement and local support but communities and campaigners in this region remain concerned about the following:

- The composition of Strategic Boards and working groups
- The interrelation between regional and national plans
- The exact role of NESO at regional and local level and its ability to carry out the tasks proposed

Firstly, we believe representation on Strategic Boards (**QS 11 and 12**) should include a wide cross section of interested parties. Many LAs already have policies in place and under execution for reducing the carbon footprint of their own activities and of the industries and population in their districts and counties. Elected members and officers involved in this process will need to be included. However, there also needs to be a mechanism for including representatives of those who are affected by these policies. This includes those who are impacted by the development of

infrastructure and generation. The consultation documents accepts the need for “under-represented stakeholders” to be included (Table 3, page 32). These will vary between rural and urban areas and in different parts of the country but each Board should set out clearly how it has considered and managed the inclusion process.

Secondly, the consultation is not at all clear on how the process of feeding information along the “spokes” to inform central policy will be managed. Nor as to how such information will influence policy for larger scale national policy and development.

For example, improving the supply of local demand information may be useful but no one is suggesting the UK becomes a command economy under which supply would be directly managed. Such information may assist in developing and overseeing markets but it remains unclear how this process could progress and what actions would follow.

Of greater concern to our communities is that ‘snapshots’ of such information, collected over a short duration and which are quite likely to be incomplete, could be used to justify inappropriate local and national infrastructure. Planning decision debate frequently illustrates the contentious nature of local and regional socio-economic data. We therefore suggest more explanation and work is needed to show how the process will be developed.

Thirdly, with regard to the role of NESO and in response to **Q 10**, we understand Ofgem’s reluctance to give regional bodies final responsibility (para 4.9). However, we are concerned that Ofgem is expanding NESO’s brief in a way that could become detrimental to local communities and to NESO itself.

In basic ‘lay’ terms, NESO makes recommendations that enable developers to propose various works and that help justify their application to Ofgem for these works to be funded. The planning process remains the final arbiter for most new regional and national works. Regional Boards could make requests, challenge NESO’s assumptions or collaborate with NESO on research for innovative projects. Throughout such processes NESO’s role and that of the bodies that make up the Boards would remain unchanged. The status quo therefore seems satisfactory. Questions arise over the planning stages but that is outside Ofgem’s responsibility.

John Foster for the EAAAG