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Regional Energy Strategic Plan – Methodology Consultation

Thank you for the opportunity to comment on the emerging proposals for the Regional Energy Strategic Planning methodology. The effective development of electricity and gas distribution infrastructure is, and will continue to be, critical for the economic development of Suffolk, and the prosperity and resilience of its communities. However, it is essential that this process is well coordinated and minimises the adverse impacts of new infrastructure.

Likewise, it is essential that the governance and process of RESP can secure and maintain public confidence, therefore the Council welcomes the inclusion of democratically elected bodies on the Regional Energy Strategic Planning Boards.

Whilst Suffolk County Council has responded to the questionnaire in full; it is important to highlight the Council's key concerns:

- The uncertainty regarding the “fast track” devolution process will cause knock on issues for RESP governance and engagement in Suffolk, Norfolk, and Essex. It had been expected that the Mayoral Combined County Authority would be in a position to take the lead role on the regional Board. However, changes to the timeline and funding arrangements for the MCCA, means that this is no longer certain.
- It should be noted that engagement with the RESP process is not currently supported by the “new burdens” doctrine, as OFGEM set out in the consultation of July 2024:
“It is not within Ofgem’s powers to determine which duties local authorities should hold regarding local energy planning or to provide funding to local authorities. This is a matter for government. We will continue to work with

colleagues in government on the wider energy system planning governance landscape and highlight the impacts relevant to local authorities.”

Whilst this issue remains unresolved, local capacity for engagement with RESP remains at risk.

Therefore, Suffolk County Council considers that it would be appropriate for the National Energy System Operator to engage with DESNZ and MHCLG, to ensure that the objectives that Ofgem have set for the successful operation of RESP Boards can be achieved in the devolution priority programme areas, such as Norfolk and Suffolk, given risk of capacity and funding constraints emerging from uncertainty regarding the progress of devolution, prior to 2028.

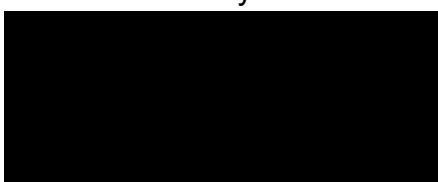
- NESO should understand that Councillors can only attend the RESP Board if they are supported by officers at such a meeting. It is not appropriate for elected members to attend such boards without officer support. However, an authority may choose to send an officer alone depending on the agenda of the Board and the scheme of delegation of that Authority.
- The approach to local actor support is acceptable. However, the Council would welcome the opportunity to work with NESO to identify appropriate community and third sector actors that will need to receive such support. Community energy, local decarbonisation, fuel poverty, and economic development are all areas in which the authority is active, and the potential list of actors is broad.

Finally, on a related matter, it is noted that the NESO will be issuing the Gate 2 connection offers for new generation infrastructure, to delivered after 2030, during Q2 and Q3 of 2026. A review of the Transmission Entry Capacity Register (TEC) indicates this will apply to multiple projects across Suffolk. Therefore, in a spirit of constructive engagement with NESO, the Council requests that a more accessible summary (than the TEC Register) of the projects that have received a Gate 2 offer in this RESP region (Norfolk Suffolk and Essex) is made available at an appropriate point in the process, such a at the end of Q3.

Greater clarity will enable NESO's Local Authority partners to plan more effectively for the management of likely planning applications, the engagement with project promoters, and community interest around these emerging proposals.

The full response to the consultation is appended to this letter.

Yours faithfully



Andrew Cook

Deputy Chief Executive and Executive Director of Growth Highways and Infrastructure

Appendix

- 1. Do you agree that in Scotland and Wales the strategic plans outlined in this methodology should be known as the Scotland RESP and Wales RESP respectively? If not, what alternative should be used?**

Suffolk County Council has no comment on this matter

- 2. Do you agree with our approach to engagement as we develop the RESPs? Please provide your reasoning**

The proposed approach to engagement appears to robust, proposed effective use of the full *International Association for Public Participation (IAP2)* approach is welcome. However, NESO should recognise the significant capacity constraints within local government that may hamper engagement. Furthermore, the uncertainty regarding the “fast track” devolution process will cause knock on issues for RESP governance and engagement in Suffolk Norfolk and Essex.

Furthermore, it should be noted that engagement with the RESP process is not currently supported by the “new burdens” doctrine, as OFGEM set out in the consultation of July 2024:

“It is not within Ofgem’s powers to determine which duties local authorities should hold regarding local energy planning or to provide funding to local authorities. This is a matter for government. We will continue to work with colleagues in government on the wider energy system planning governance landscape and highlight the impacts relevant to local authorities.”

Whilst this issue remains unresolved local capacity for engagement remain at risk

- 3. Do you agree with the approach we have outlined on local actor support, and how we have phased the delivery? Please provide your reasoning.**

The approach to local actor support is acceptable. However, the Council would welcome the opportunity to work with NESO to identify appropriate community and third sector actors that will need to receive such support. Community energy, local decarbonisation, fuel poverty, and economic development are all areas in which the authority is active, and the potential list of actors is broad.

4. Do you agree that Local authorities should be able to decide whether to send a political representative or officer to the Strategic Board? Please provide your reasoning.

NESO should understand that Councillors can only attend the RESP Board if they are supported by officers at such a meeting. It is not appropriate for elected members to attend such boards without officer support. However, an authority may choose to send an officer alone depending on the agenda of the Board and the scheme of delegation of that Authority.

As set out in the previous OFGEM Consultation in July 2024:

“We expect all Board members to have the necessary expertise and authority to represent their organisation or membership where a broader representative role is performed”

5. Do you agree with our proposed voting structure for Strategic Boards? If you think we should change it, please provide your reasoning.

The voting structure is acceptable as it avoids a situation where a single organisation can exert undue influence, this is particularly important given the imbalance of expertise between board members as previously identified by OFGEM.

6. Do you feel any changes should be made to the proposed terms of reference? Please provide us with details.

No changes required

7. Do you agree with our proposals for appointing members of the Strategic Boards? If you think we should change it, please provide your reasoning.

Agreed

8. Do you agree with our proposed design for working groups? If not, what changes would you propose and why?

Agreed

9. Do you agree with the proposed representation for the GB Steering Committee? If not, are there other participants you feel we should consider?

The proposed representation is likely to be acceptable however there will need to be an expectation and process for Local Government representatives, UK100, LGA, to consult with their members and provide that feedback into the GB Steering Group.

10. Do you agree that we should not be making major changes to the RESP methodology within cycle? If not, please can you give examples of circumstances where you think this may be necessary?

In the absence of exceptional issues or circumstance it would not be appropriate to make major changes to the RESP Methodology within a cycle.

11. Do you agree with the approach for the Nations and Regions Contexts? Please provide your reasoning.

This approach is acceptable and can be reviewed in light of experience following the first cycle.

12. How do you envisage using the Nations and Regions Contexts and what would make the output work best for your needs?

Providing a Framework for local energy planning and providing a wider context for local issues.

13. Do you agree with the scope of 'Whole Energy' for RESP outputs?

Agreed

14. How do you envisage using the RESP Pathways and how can we communicate Pathways to support you to use them effectively?

They will provide a useful shared reference between the LA planning system and our DNS, to better align network investment with development need. A plan for relevant Cllr briefing would help

15. Do you agree with the approach for the RESP Pathways? If not, please provide your reasoning.

Agreed

16. Do you agree with our prioritisation approach and criteria set out to evaluate the validity of the Consistent Planning Assumptions values? Please provide your reasoning.

No comments

17. Do you agree with our approach for the Consistent Planning Assumptions? Please provide your reasoning.

No comments

18. Our preferred approach is to move the RESP delivery dates back to enable option 2. Do you support this approach and are there any other wider factors we should consider?

Agreed Spatial context should be published as part of full RESPs

19. Do you agree with our proposed approach for the Spatial Context? Please provide your reasoning.

The status and projection of change for off grid liquid fuels should be included otherwise this is a significant omission of off gas grid rural areas.

20. How do you envisage using the Spatial Context and how can we communicate these outputs to support you to use it effectively?

The Spatial Context Potential applications in funding bids to support visualisation of demand and need over time.

21. Do you agree with our description of the three types of complexity and the examples indicated? What additional considerations should we take to categorise complex strategic energy needs? Please provide your reasoning.

No Comments

22. What further considerations should we take as we develop the approach for specifying and categorising Strategic Investment Needs to ensure consistent regulatory treatment of network investments? Please provide your reasoning.

No Comments

23. What examples of whole system optimisation opportunities are you are aware of and what considerations should we take to identify, prioritise and develop these collaboratively with you?

No Comments

24. Do you support the selection of Option 2 as delivering best value in assuring alignment? If not, please provide your reasoning

No Comments

25. What further considerations should we take as we develop the approach to Network Planning Assurance for gas distribution networks? Please provide your reasoning

No Comments

26. Do you agree with our approach to societal considerations? What additional considerations should we make on PSED as we develop the RESPs? Please provide your reasoning.

The proposed approach to the public sector equality duty appears to be broadly acceptable. However, it may be appropriate to include an additional category relating to rurality; given the preponderance of off gas grid homes and businesses, the challenges to distribution network and its capacity for decarbonization and to support economic growth, in rural communities. Whilst at the same time, the bulk of new generation infrastructure is primarily located in rural areas. Although rurality is not a characteristic protected by law, Suffolk County Council has determined that it is good practice to consider carefully how they may affect people's experience of a policy or service and therefore does so in the application of the PSED.

27. Do you agree with our proposed environmental approach? Please provide your reasoning if you think we should be doing this differently.

The Council considers that the Environmental approach is likely to be acceptable. It is noted that whilst SEA is appropriate for CSNP and SSEP, as previously advocated by Suffolk County Council, Ofgem does not consider it appropriate or necessary for RESP.

28. Do you have any observations or suggestions on our proposed approach to managing RESP data?

No comments

29. How frequently do you believe data refreshes should occur to ensure the RESP remains accurate and useful? What criteria should trigger a data refresh? Please provide your reasoning.

No comments

30. Will commercial sensitivities discourage you or other stakeholders from contributing to the in-development register? What measures could help build confidence in sharing information?

No comments

31. Overall, do you agree with the approaches proposed across the RESP methodology? Are there any elements of the methodology that you would like to see in more detail?

No comments