



Community Energy Scotland
Cumhachd Coimhearsnachd na h-Alba

Transmission Access
Future Electricity Networks Team
Department of Energy and Climate Change
3 Whitehall Place
London SW1A 2HD

1st April 2010

Dear Sir or Madam

**Improving Grid Access – Technical consultation on the model for
improving grid access – 1st April 2010**

Please find attached our response to the above consultation.

Community Energy Scotland is a registered charity dedicated to building confidence, resilience and wealth at community level in Scotland through sustainable energy development. We have supported hundreds of community-owned renewable energy projects across Scotland and are currently delivering funding to projects up to 10MW.

We believe that community owned and based renewable energy development has a vital role to play in a low carbon future and can be developed in a way which brings many benefits to the local community.

Our focus in responding to the consultation is, therefore, on its implication for renewable energy development by community groups.

We are happy for this response to be made public.

Yours sincerely

Nicholas Gubbins
Chief Executive

**Community Energy Scotland response to Improving Grid Access –
Technical consultation on the model for improving grid access – 1st
April 2010**

This response is set out according to the questions in the consultation document.

1. Do you agree that the proposed model for reforming grid access would best meet the Government's objectives for this reform? We would particularly welcome comments on:

Connect and Manage – Socialised Costs: Community Energy Scotland agrees with most of the assessments of the likely impacts of this model, noting that they are generally very positive and in line with wider policy aims to maximise renewable electricity generation. The socialised model is beneficial for community group-based energy developers as they will not have the opportunity to develop a scheme elsewhere in the country far from their own geographical location, so it would not necessarily be possible for them to seek plant locations which have less impact on wider connection costs.

It would also be useful to encourage different renewable technologies to share limited network capacity, where they have complementary generation profiles. For example a wood-fuelled biomass power station has storage capability and might potentially feed into the same network as a windfarm, without requiring an increase in the latter's maximum export capacity: the biomass power station would generate to 'fill in the gaps' in the wind output profile. The capacity factor of wind is rarely more than 40% so there is effectively 60% unused (on average) export capacity available (though perhaps this kind of synergy can take place under existing connection rules).

Full socialisation offers the most equitable and effective option, as it will not penalise those who are looking to develop schemes in areas where the grid is weak. These are often areas where there are strong renewable resources, such as the wind, hydro and wave resources in the Western Isles and Argyll. These resources are likely to be under-developed if those behind a constraint have to pay for the costs associated with a Connect and Manage scheme. This could have negative implications for meeting Scottish and UK targets for renewable electricity production and for carbon emissions reduction. Encouraging developers to areas where the grid is stronger may not necessarily put developments in areas with the strongest renewable resources. Likewise it might severely affect the viability of community schemes in remote and economically deprived areas, which frequently have weak distribution networks. A socialised model would remove this consideration, and would provide a level-playing field for developers, allowing them to viably develop schemes in the areas of best renewable resource, and of greatest community need.

• The definition of 'enabling works';

Community Energy Scotland thinks that the removal of the arbitrary minimum 4 year period to connection is fair.

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- **The process for derogation from the SQSS;**

Community Energy Scotland agrees in principle with the process for derogation. It is vital however, that the veto powers which will be held by National Grid (as System Operator) are accompanied by a robust appeals process to ensure decisions are not veto'd on the basis of impact on National Grid's income and that decisions are based on the effective management of the system.

- **The extension of user commitment;**

Community Energy Scotland agrees with that there is a value in extending user commitment.

- **The transition arrangements.**

Agree.

2. Do the proposed licence and code amendments deliver the policy aim?

No comment.

3. Do you think there are any other changes to industry codes and licences or any other actions needed to implement the model?

No comment.

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