

Stakeholder Feedback

Our Second Consultation February – March 2013

Scottish and Southern Energy Power Distribution (SSEPD) is the owner of two electricity distribution networks:

- Scottish Hydro Electric Power Distribution (SHEPD) in the north of Scotland,
- Southern Electric Power Distribution (SEPD) in the south of England.

Electricity distribution networks transport electricity to customers' homes or business premises. We do not sell electricity to customers – that is the role of energy suppliers. Our duties and obligations include ensuring we are able to provide an economic and efficient service to users, including generators, who wish to connect to our network.

Our Second Consultation sought the views of our customers and wider stakeholders around our business activities over the period to 2023 and beyond. We have placed the needs of our customers and wider stakeholders at the centre of our planning to ensure that our distribution networks are fit for purpose. The results and key themes from this consultation have already been used to help inform our business plan.

Our Second Consultation paper was actively distributed to over 2000 stakeholders who had expressed an interest in participating in Our Programme of Listening. In addition to this, we encouraged responses from the widest possible audience by making the Our Second Consultation paper available on our website; as well as promoting it on our social media channels and within both local and industry press. Sixty-seven stakeholders responded to our consultation.

Details of the responses for Questions 1 to 10 are covered in the following pages. These tables set out the questions we asked, stakeholders feedback and our response.

Question 1: Does our proposed approach to planning for the future strike the right balance between cost and customer benefit?

Stakeholder group	Stakeholder feedback				Feedback by stakeholder group	Summary of stakeholder feedback to question 1 and our response
	Yes	No	No response	Free text response		
Customer	13				Customers views were divided as to whether or not our proposed approach to planning for the future strikes the right balance between cost and consumer benefit. We did not receive any additional comments relating to responses from this group and so are unable to analyse this any further for this group.	<p>Key Theme: The majority of respondents agree our proposed approach to planning for the future strikes the right balance between cost and customer benefit.</p>
		8				
			8			
Connections	1			a) Seems a reasonable approach. Whilst R&D spend has increased in last years, I'm surprised it's low in relation to overall spend.	Connections customers responding to this question were divided equally as to whether or not our proposed approach to planning for the future strikes the right balance between cost and consumer benefit. One respondent remarked that research and development spend seemed low.	<p>Our Response: Two stakeholders indicated their concern that the allocated budget for Research & Development (R&D) spend was low in the context of our overall expenditure. The key challenge for our innovation strategy is to prepare our network and our business for the numerous possible scenarios in RIIO-ED1 and beyond. The wide variation in the possible scenarios is driven by factors such as customer behaviour, climate variations, energy security and transport policy. Our R&D spend is sized to enable us to cope with this range of possible scenarios, through both the breadth of potential solutions and depth in the considered time horizons. However, in order to ensure value for money, our R&D spend must be sufficiently focussed for us to implement those innovations most appropriate to whichever scenario ultimately occurs. In practice, we anticipate this will lead to a more incremental approach to innovation deployment during RIIO-ED1. The alternative approach of significantly expanding our R&D spend to undertake top-down deployment of innovative solutions could risk assets becoming redundant before they have realised benefits (the top-down deployment of smart meter-related solutions will be the exception to this).</p>
		1				
			1			
Government and Public Sector Organisations	3			a) This depends on what you consider to be the cost, there is financial cost, then landscape and environmental cost. It also depends on how you define benefit. Benefit in terms of cost, reliability or landscape and environmental impact.	<p>Three Government and Public Sector Organisations agreed that our proposed approach to planning for the future strikes the right balance between cost and consumer benefit. One respondent, who chose not to indicate if they were in favour of our approach or not, mentioned that the benefits can be derived from investing ahead of need (referencing a National Grid document as evidence of the benefits of this approach) as well as highlighting that given the benefits derived from research and development the budget allocated to this seems to be low.</p> <p>Four local authorities agreed that our proposed approach to planning for the future strikes the right balance between cost and consumer benefit. Two respondents indicated the need to continue to engage with our stakeholders.</p>	<p>One stakeholder expressed the view that our assessment of costs should be extended to consider the environmental cost of options. This will be addressed in the environment section of our Business Plan which will include our views on reducing losses and improving visual amenity and how we judge the cost/benefit ratio of these activities.</p>
		0				
			4	<p>a) Scottish Hydro Electric Power Distribution (SHEPD) is to be commended for its work on the Orkney RPZ and the NINES project which have and will lead to significant levels of new generation being able to connect to a constrained grid. Valuable learning is taking place as part of these projects which will be of future benefit to the UK as we collectively move towards a higher penetration of renewables in the energy mix. While there is currently a moratorium on new connections over 3kW in Orkney, we recognise that the issue is being championed within SSE and that proposals to further develop the capabilities of the RPZ as well as the distribution and transmission network are in hand. Around half of the homes in the Scottish Hydro Electric Power Distribution (SHEPD) area are off the mains gas network and some are even off the electricity distribution system. The area contains a high number of 'hard to treat' low thermal efficiency properties and the population earns less than 75% of the UK average income. All of these factors lead to a disproportionate level of fuel poverty in the Highlands and Islands and the proposed approach to funding innovation and early reinforcement will increase pressure on an already sensitive affordability scenario. However, we believe it offers the potential to develop an approach to renewables deployment which could enable:</p> <ul style="list-style-type: none"> • higher levels of local and community ownership • earlier connection of renewables projects • higher penetration of renewables • lower dependence on carbon intensive fuel sources <p>On balance, it is our view that these benefits outweigh the increase in costs consumers will face in the wider SHEPD area, despite the level of fuel poverty in the region and therefore believe that a sensible balance has been struck between costs and consumer benefits. However, National Grid has previously published research which shows it is economically optimal to 'overbuild' circuits than to build precisely what is contracted for. This being the case, [company name removed] maintains that it would be sensible to have a wider smearing of anticipatory investment beyond SHEPD's licensed area. Furthermore, given the learning that will accrue to the UK from the SHEPD's proposals, [company name removed] believes that they should attract greater levels of innovation support from the Regulator. The amount of innovation funding made available to projects in Scotland to date has been a disappointingly low proportion of the overall funding made available for smart grids. We hope you find these comments useful and would like to offer our continued support in achieving a regulatory environment which facilitates the kind of innovation outlined in the consultation document. We also look forward to viewing your plans for further development of existing smart grid schemes, development of new schemes and roll out of learning from those schemes to other parts of the SSEPD network in due course.</p>		
Local Authority	4			<p>a) Continued consultations at all levels are important with feedback to all groups/interests.</p> <p>b) I would welcome the opportunity to explore possibilities for local network – community OR investment groups involvement.</p>		
		0				
			4	<p>a) The Council accepts that there is a balance to be struck between exposing customers to excessive or needless cost, and the need to prepare for the changing world of LCT [low carbon technologies] and distributed generation. However, it is not clear from the document where SSEPD is striking this balance, in fact clarity will only come when decisions on specific cases are made. It is worth making the point that there will be costs to consumers if the challenges of moving to a decarbonised and decentralised electricity system are not met, in terms of price and security of supply of electricity. Overall, the Council is encouraged by and supports the commitment made in the document to development of the network in advance of need. Of the three requirements for such action set out in the Connections Policy supporting document, two at least are clearly present in Orkney, indeed have been so for some time, namely 'networks where only limited spare capacity currently exists', and 'locations with genuine customer enquiries.' The announcement by SSEPD in September 2012 of restrictions on micro-generation connections in Orkney clearly demonstrates the former; while the pipeline of projects and interest in micro-renewables from households and businesses in Orkney is evidence of the latter. This evidence is being detailed through the tri-partite Steering Group's work, and when completed this should provide a solid basis for a development plan for the Orkney network to meet future requirements.</p>		

Question 1: Does our proposed approach to planning for the future strike the right balance between cost and customer benefit? (Continued)

Stakeholder group	Stakeholder feedback				Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 1 and our response
	Yes	No	No response				
Emergency services and NHS bodies	0					No responses were received from emergency services and NHS bodies.	Another stakeholder expressed the view that the north of Scotland has a high level of fuel poverty and a concern that our proposals for investment in innovation and early reinforce might make this situation worse – although on balance they agreed it was the right solution. Our Business Plan will include a section on how we anticipate working in partnership with other organisations where we can develop innovative solutions to reduce fuel poverty.
		0					
			0				
Regulators	0					No regulators responded to this question.	
		0					
			1				
Energy Industry bodies	0					No responses were received from energy industry bodies.	
		0					
			0				
Energy supply companies	1			a) The cost must be viewed as an investment and not just a balance between cost/customer benefit. The sales project to get new customers and retain existing customer needs a non financial indicator. I have given a yes vote bounded by my comments.		One energy supply company agreed that our proposed approach to planning for the future strikes the right balance between cost and consumer benefit. However, this was caveated by the need to invest in the network.	Several stakeholders expressed the view we should be doing more to invest in our networks ahead of need and be bolder with our plans. We have to strike a balance with costs to customers but our Business Plan will include proposals for early investment in response to stakeholders views.
		0					
			0				
Elected Officials	0					No responses were received from elected officials.	
		0					
			0				
Utilities	2					Two utility companies agreed that our proposed approach to planning for the future strikes the right balance between cost and consumer benefit. However one disagreed. One other utility company did not agree or disagree with our approach but they looked for further information around how we will deliver active demand side management; and manage asset health.	One stakeholder was concerned that our use of an overall Health Index to monitor the overall condition of our assets might lead to individual items being neglected. Our Inspection and maintenance policy encompasses regular checks on the condition of all above-ground assets on our network avoiding the risk of individual items being neglected.
		1					
			1	a) In planning for the future, you might want to additionally consider: <ul style="list-style-type: none"> • How distributed generation from renewable energy sources can be matched in real time with new controllable demands such as electric vehicle charging and heat pumps. There may be an increasing opportunity for Distribution Network Operators to become "Distribution System Operators". • Setting a minimum level of Health Index for any individual asset (as opposed to asset classes), so that for instance, single oil filled fuse switches are not neglected for replacement just because they are on a distribution network spur and only supply one transformer. Such assets still present a safety and supply continuity risk. 			
Consumer Representatives	1			a) Savings to be made by 2030 can only be 'pie in the sky'. Today, 5 years is as long as anyone can have much idea about the future!		One consumer representative agreed that our proposed approach to planning for the future strikes the right balance between cost and consumer benefit but caveated this with how difficult it is to predict the cost savings which can be made.	Ultimately Ofgem will judge whether they believe we have got this balance right.
		0					
			4				
Trade Unions and affiliated bodies	0					No responses were received from trade unions and affiliated bodies.	
		0					
			0				

Question 1: Does our proposed approach to planning for the future strike the right balance between cost and customer benefit? (Continued)

Stakeholder group	Stakeholder feedback			Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 1 and our response	
	Yes	No	No response				
Supply chain and service providers	6			<p>I have completed the on-line survey into 'Innovating for a greener, more efficient future' but wanted to expand our views which might be helpful and could be included in your next submission to Ofgem.</p> <ul style="list-style-type: none"> At [company name removed] we manufacture a range of primary power and distribution transformers. We also offer a transformer refurbishment service which (a) aims to extend the normal asset life of transformers and (b) in some circumstances increases the rating of the units. We supply new transformers to SSEPD but also regularly refurbish units which other, less innovative DNOs, might consider to be at the end of their useful lives. We believe that Ofgem should recognise SSEPD's innovative approach to life extension and through the RIIO mechanism reward SSEPD (and indeed other DNOs). In our view the incentive mechanism could be very straightforward and the attached model indicates a suggested approach. It seems fair and reasonable to us that the financial benefit is shared equally between the customer and the DNO. (See 9 below for an indication of the potential saving). Primary distribution transformers are typically regarded as having a life of around 40 years. However, in the UK where most primary substations are operated on the principle of N minus 1, transformers normally operate at less than 50% of their rated output. The most common failure mode in transformers is linked to degradation of the paper insulation covering the windings. We believe that transformer life can be extended considerably beyond 40 years through intrusive refurbishment; typically this will involve: <ul style="list-style-type: none"> Removal from site De-tanking of the active part in a clean, controlled environment. Visual inspection of the active part Complete tap-changer maintenance Re-tightening of all the connections in particular the core clamps (to reduce noise) Re-drying the active part Re-tanking and filling with new insulating oil Re-testing of the unit in line with the IEC specification to prove the integrity of the dielectric insulation (the paper insulation); this is a key issue. Complete refurbishment of the tank walls including re-painting and treating any corrosion. Our experience of 7 above is that the life of the transformer can be extended considerably to the benefit of the customer through lower additions to the Regulatory Asset Base than would be the case in replacement with a new unit. We believe that this innovative approach should be rewarded by additional incentives for DNOs, such as SSEPD, which adopt this approach. We recognise that each particular unit will most likely require specific attention but as a rule of thumb refurbishment can be undertaken at around 40% of the cost of a new transformer. In 2 (b) above we mention increasing the rating of transformers. We have undertaken this for SSEPD to address load growth issues. This can be achieved by increasing the cooling capacity and can be proved in the IEC test process. Again, this approach should be rewarded by incentives. This approach also has strong environmental credentials which in itself deserve to be rewarded under RIIO. We would be very happy to discuss this approach with Ofgem if you thought it would be helpful. <p>SSEPD is at the vanguard of innovation and should be rewarded appropriately under the ED1 control in recognition of this.</p>	Six supply chain and service providers agreed that our proposed approach to planning for the future strikes the right balance between cost and consumer benefit.		
		0					
				0			
Landowners and Estates	1			a) But is it truly deliverable?	One landowner and estate category respondent agreed that our proposed approach to planning for the future strikes the right balance between cost and consumer benefit but asked if it was truly deliverable.		
		0					
Innovation Community							
	1			a) Do we agree with your approach? Broadly 'Yes' in that you have asked, listened, are now checking if what you heard was right and are now looking to set out a clear plan for the coming years. But 'No' in as much as there is an excessive onus on your own safety and efficiency and insufficient attention paid to the opportunities of decarbonisation. The investment plans look under-whelming and you seem to be standing in front of an open door to a sustainable and electrified future but hesitant to lead through it. [Company name removed] would strongly urge you to be braver and more dynamic.	One member of the innovation community responded to this question and agreed that our proposed approach to planning for the future strikes the right balance between cost and consumer benefit. However, there was a very clear concern that we not grasping the opportunities presented by decarbonisation of the energy market.		
		0					
			1				

Question 2: Do you think our proposals in respect of planned interruptions are reasonable?

Stakeholder group	Stakeholder feedback				Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 2 and our response
	Yes	No	No response				
Customer	16					The majority of our customers who responded to this question thought that our proposals in respect of planned interruptions were reasonable.	Key Theme: The majority of respondents agreed that our proposals in respect of planned interruptions are reasonable. However, a number of stakeholders also indicated ways that they felt we could further improve our proposals.
		4					
			9				
Connections	1					Connections customers who responded to this question were divided as to whether or not our proposals in respect of planned interruptions were reasonable.	
		1					
			1				
Government and Public Sector Organisations	2					Government and public sector organisations who responded to this question were divided as to whether or not our proposals in respect of planned interruptions were reasonable. Two thought that our proposals were reasonable; but one felt that they were not and highlighted that the demographics of island populations mean that we need to go further to support these customers.	Our Response: One stakeholder suggested we should take extra measures to ensure vulnerable customers are supported during planned interruptions as not all our customers will have access to smart phones and social media. We agree and will ensure that we offer all our customers access to up-to-date information about their supply across a wide range of media via traditional methods and digital technologies. For instance, we are implementing a new integrated communication platform which has many features including the option to send automated text updates to customers who wish to receive them during unplanned interruptions.
		1		a) 50% of the Islands population is over retirement age. SSE[PD] should ensure that all those effected are at least aware, preferably supported. This could include going beyond using smart phones and social media, to knocking on peoples doors and putting information leaflets through letter boxes. It should also ensure that vulnerable people are identified and supported. A phone call from a call centre once every three hours is not enough.			
			4				
Local Authority	5				a) On the whole customers are understanding of the need for planned interruptions, and appreciate the arrangements put in place by SSEPD. Advance information is critical, and the proposal to extend advance notification period from 2 to 7 days is to be welcomed.	All local authorities who responded to this question thought that our proposals in respect of planned interruptions were reasonable.	
		0					
			3				
Emergency services and NHS bodies	0					No responses were received from emergency services and NHS bodies.	
		0					
			0				
Regulators	0					No regulators responded to this question.	
		0					
			1				
Energy Industry bodies	0					No responses were received from energy industry bodies.	
		0					
			0				
Energy supply companies	1				a) Definite yes – communication on these topics is essential to success and will build customer confidence in our company.	The energy supply company who responded to this question thought that our proposals in respect of planned interruptions were reasonable.	
		0					
			0				
Elected Officials	0					No responses were received from elected officials.	
		0					
			0				
Utilities	2					Two utility companies who responded to this question thought that our proposals in respect of planned interruptions were reasonable. One stakeholder asked if we considered other factors in addition to Customer Interruptions and Customer Minutes Lost when considering investments to reduce planned or unplanned interruptions.	We are also proposing to create a dedicated team who will administer our Priority Service Register and consistently deliver the service we detail in our Priority Service Register Code of Practice (which includes being able to tailor communication, format and messaging, to registered customers based on their needs). For further details on the service we provide to Priority Service Registered customers please see our Priority Service Register Code of Practice which is available on our website (http://www.ssepd.co.uk/uploadedFiles/Controls/Lists/Customer_service/SSEPDCodeOfPractice.pdf).
		0					
			2	a) SSE Power Distribution has made considerable improvements to their procedures for notifying us of planned supply interruptions over the last 12 months. Automation of this process such as by network to customer address electronic links might further reduce the scope for human error. I note on page 14 that you intend to invest £1.5 million to £2.5 million to strengthen your network and provide alternative supplies to an increased number of properties. Does this mean going beyond what is required under P2/6, or is where you are or will be non-compliant with P2/6? Investment to reduce planned (or unplanned) supply interruptions should take into account the economic and other costs of supply interruptions to the consumer rather than just reducing CIs and CMLs, which might otherwise not provide good value since it might favour customer groups whose economic exposure is lower.			
							One stakeholder queried whether our proposals for additional investment were directed at situations where our networks were not compliant with planning standards. This is not the case – we will target locations which deliver the biggest benefit to customers based on network configuration and customer numbers.

Question 2: Do you think our proposals in respect of planned interruptions are reasonable? (Continued)

Stakeholder group	Stakeholder feedback			Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 2 and our response
	Yes	No	No response			
Consumer Representatives	1	0	4	a) Better communication with the customer must always be the objective!	The customer representative who responded to this question thought that our proposals in respect of planned interruptions were reasonable.	
Trade Unions and affiliated bodies	0	0	0		No responses were received from trade unions and affiliated bodies.	
Supply chain and service providers	6	0	0		All supply chain and service providers who responded to this question thought that our proposals in respect of planned interruptions were reasonable.	
Landowners and Estates	1	0	0		One respondent from the landowner and estates category who responded to this question thought that our proposals in respect of planned interruptions were reasonable.	
Innovation Community	0	0	2		No members of the innovation community responded to this question.	

Question 3: Do you think our proposals in respect of unplanned interruptions are reasonable?

Stakeholder group	Stakeholder feedback				Feedback by stakeholder group	Summary of stakeholder feedback to question 3 and our response
	Yes	No	No response	Free text response		
Customer	12			a) Yes. As most have seen in the media e.g. storm, flood, snow etc your approach appears to be well thought out. When you mobilise teams to reconnect customers in an area affected by unplanned interruptions to draft teams of engineers from the unaffected areas, often at very short notice. 10 out of 10 to everyone from the person at the top to the person cold wet making the final connection restoring power, well done.	The majority of customers responding to this question agree that our proposals in respect of unplanned interruptions are reasonable. Six however did not.	<p>Key Theme: The majority of respondents agreed that our proposals in respect of unplanned interruptions were reasonable. However, a number of stakeholders also indicated ways that they felt we could further improve our proposals.</p> <p>Our Response: One stakeholder suggested we should take extra measures to ensure vulnerable customers are supported during planned interruptions as not all our customers will have access to smart phones and social media. We agree and will ensure that we offer all our customers access to up-to-date information about their supply across a wide range of media via traditional methods and digital technologies. For instance, we are implementing a integrated communication platform which has many features including the option to send automated text updates to customers who wish to receive them during unplanned interruptions.</p> <p>We also propose to create a dedicated team who will administer our Priority Service Register and consistently deliver the service we detail in our Priority Service Register Code of Practice (which includes being to be able to tailor communication, format and messaging, to registered customers based on their needs). For further details on the service we provide to Priority Service Registered customers please see our Priority Service Register Code of Practice which is available on our website (http://www.ssepd.co.uk/uploadedFiles/Controls/Lists/Custom_service/SSEPDCodeOfPractice.pdf).</p> <p>Most significantly our plans for the next decade include reducing the average number and duration of interruptions by an average of 6% and 20% respectively.</p>
		6				
			11			
Connections	1				Connections customers who responded to this question were divided as to whether or not our proposals in respect of unplanned interruptions were reasonable.	
		1				
			1			
Government and Public Sector Organisations	2				Government and public sector organisations who responded to this question were divided as to whether or not our proposals in respect of unplanned interruptions were reasonable; but one felt that they were not and highlighted that the demographics of island populations mean that we need to go further to support these customers.	
		1		a) 50% of the Islands population is over retirement age. SSE[PD] should ensure that all those effected are at least aware, preferably supported. This could include going beyond using smart phones and social media, to knocking on peoples doors and putting information leaflets through letter boxes. It should also ensure that vulnerable people are identified and supported.		
			4			
Local Authority	4			a) SSEPD clearly appreciates the serious consequences for customers of unplanned interruptions, and the priority given to responding quickly to such episodes is welcomed. b) BUT: Unplanned interruptions in a system which has no spare capacity will have serious implications for industry and consumers. More pressure on Governments to plan for long term generation of electricity from nuclear, coal burning, gas, hydro, wind and wave in correct locations. c) If information is provided promptly, and customers know how this will be done, there will be fewer enquiries during an unplanned interruption.	Four local authorities thought our proposals in respect of unplanned interruptions are reasonable. However, one respondent mentioned the need for government to consider where energy will be generated in the future as this will affect reliability of our networks. One local authority who did not think our proposals were reasonable stated that our consultation did not adequately consider the impact that climate change will have on our networks and how we will plan for this to maintain supply reliability.	
		1		a) The extreme weather events you refer to on page 17 are based on the SSEPD Climate Change Adaptation Report. This report does not mention wildfire risks from hotter, drier summers, even though you make extensive use of wood poles and acknowledge increased vegetation growth in 3.2.7 & 5.2. It would be interesting to know the impact of the 2011wildfires in Scotland and SE England on your operations.		
			3			
Emergency services and NHS bodies	0				No responses were received from emergency services and NHS bodies.	
		0				
			0			
Regulators	0				No regulators responded to this question.	
		0				
			1			
Energy Industry bodies	0				No responses were received from energy industry bodies.	
		0				
			0			
Energy supply companies	0				One energy supply company responded to our consultation thought that our proposal in respect of unplanned interruptions was unreasonable and that we should be aiming for 100% supply reliability.	
		1		a) "[It] happens" is never good and should be treated like the safety family programme where unplanned interruptions are not acceptable.		
			0			
Elected Officials	0				No responses were received from elected officials.	
		0				
			0			
Utilities	2				Two utility companies who responded to the consultation thought that our proposals in respect of unplanned interruptions are reasonable. A further utility company, who did not indicate if they thought our plans were reasonable or not, suggested that we consider sending automated notifications of how long supplies were likely to be off.	
		0				
			2	a) Many [Company name removed] sites have generators which will supply our site in the event of an unplanned supply interruption. However, for these sites, during unplanned supply interruptions, there is an additional risk due to the possibility of the generator failing. We also have sites where there is no permanent generation. We may have to make arrangements for prolonged supply interruptions, such as portable generators or tankering of sewage. For this reason it is important that we are informed as soon as possible whether supply will be restored quickly by network switching of whether we are connected to the faulted section of network and so have to await repairs. Due to the high demands on SSE[PD] Emergency Centre staff during such times, could such notification be automated?		

Question 3: Do you think our proposals in respect of unplanned interruptions are reasonable? (Continued)

Stakeholder group	Stakeholder feedback				Feedback by stakeholder group	Summary of stakeholder feedback to question 3 and our response
	Yes	No	No response	Free text response		
Consumer Representatives	1			a) Better, quicker communication with the customer, especially those with e.g. electric dialysis machines.	One customer representative who responded to this question did not think that our proposals in respect of planned interruptions were reasonable and wanted to see better quicker communication with those who are dependent on their electricity supply e.g. use a dialysis machine.	
		0				
			4			
Trade Unions and affiliated bodies	0				No responses were received from trade unions and affiliated bodies.	
		0				
			0			
Supply chain and service providers	6				Six supply chain and service providers responded to this question and they all thought that our proposals in respect of unplanned interruptions are reasonable.	
		0				
			0			
Landowners and Estates	1				One respondent from the landowner and estates category who responded to this question thought that our proposals in respect of unplanned interruptions were reasonable.	
		0				
			0			
Innovation Community	0				No members of the innovation community indicated what they thought of our proposals in respect of planned interruptions. However, one respondent thanked us for keeping interruptions to a minimum.	
		0				
			2	a) [Company name removed] would also like to take this opportunity to say a specific 'Thank You' to SSE[PD]'s staff who keep the interruptions to a minimum and also deal with them when they arise. [Company name removed] really does appreciate the effort that goes into this and the personal self sacrifice of time and comfort that your staff routinely give. It is unseen, but it is not unvalued nor unappreciated. Please do pass on our sincere thanks.		

Question 4: Do you think our proposals to reduce the number of worst served customers are reasonable?

Stakeholder group	Stakeholder feedback			Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 4 and our response
	Yes	No	No response			
Customer	13			a) Yes. But worst served customer are customers nonetheless, and if we try, just that wee bit harder and go that extra mile, might make the difference between worst served and valued customers.	The majority of customers responding to this question thought that our proposals to reduce the number of worst served customers is reasonable. However, a significant number also felt that our proposals were not reasonable with one respondent asking that if we should give further consideration to undergrounding and the impact of flooding.	<p>Key Theme: The majority of respondents agreed that our proposals to reduce the number of Worst Served Customers were reasonable. However, a number of stakeholders also indicated ways that they felt we could further improve our proposals.</p> <p>Our Response: One stakeholder thought we should consider undergrounding and improving flood defences. Our Business plan will include proposals for some undergrounding and for flood mitigation.</p> <p>Several responses suggested we should be doing more to improve reliability for customers who have unreliable supplies but don't meet the criteria for Worst Served Customers. Our plans for reducing the number of unplanned interruptions will go some way to address this concern.</p> <p>One stakeholder queried the high cost of our proposals for Worst Served Customers in the north-west of Scotland. The cost of providing alternative supply connections in this very rural area is high but we will consider options to minimise these costs through the use of innovative solutions in our Business Plan.</p>
		5		a) Weather conditions are becoming more extreme, maybe more consideration should be given to undergrounding. Bear in mind flooding problems as well.		
				11		
Connections	1				Connections customers who responded to this question were divided as to whether or not our proposals to reduce the number of worst served customers are reasonable.	
		1				
			1			
Government and Public Sector Organisations	2				Government and public sector organisations who responded to this question were divided as to whether or not our proposals to reduce the number of worst served customers are reasonable. Two thought that our proposals were reasonable; but one felt that they were not and commented that when we consider improving the infrastructure which serves these customers we should consider the impact on the landscape.	
		1		a) Improving the infrastructure to customers who are the 'worst served' would benefit those customers. But this should be done while conserving and enhancing protected landscapes. In these areas, all cables should be placed underground where possible.		
			4			
Local Authority	4			[Labelling error] a) ? SEPD Restoration of Supply (StormEvents) Error in graph? – Should be (During Storms) NOT (Excl. Storms) ? as in SHEPD (Storm Events) graph.	Four local authorities thought that our proposals to reduce the number of worst served customers are reasonable. One further local authority who felt unable to indicate is our proposals were reasonable or not indicated that there was a need to see a cost benefit analysis which also looked at local generation solutions as an alternative to just reinforcing the network as the average cost per customer to achieve our proposals is high.	
		0				
			4	a) It is noted that there are 7 areas of worst served customers in the Scottish Hydroelectric area, one of these in Orkney, the island of Sanday. It is also noted that the average cost per customer is in excess of £10,000. It is difficult to judge whether this is the appropriate level of action. A cost benefit approach, balancing the costs of unplanned interruptions against the cost of remedial action, would help to determine the appropriate level. In some cases the areas of worst served customers are also areas of high potential for renewable energy, as is the case with Sanday, and this raises the possibility of achieving synergy in projects addressing both the problem of poor service and the opportunity for more renewable energy. Consultation with affected communities would be helpful in advancing this.		
Emergency services and NHS bodies	0				No responses were received from emergency services and NHS bodies.	
		0				
			0			
Regulators	0				No regulators responded to this question.	
		0				
			1			
Energy Industry bodies	0				No responses were received from energy industry bodies.	
		0				
			0			
Energy supply companies	1			a) We again need to eliminate worst served customers as an indicator otherwise success will be viewed as a reduction rather than elimination.	One energy supply company responded to our consultation thought that our proposal to reduce the number of worst served customers was reasonable and that we should be trying to improve their standard of service so that they are no longer a worst served customer.	
		0				
			0			
Elected Officials	0				No responses were received from elected officials.	
		0				
			0			
Utilities	2				Two utility companies who responded to the consultation thought that our proposals to reduce the number of worst served customers are reasonable. A further utility company, who did not indicate if they thought our plans were reasonable or not, suggested commented that the cost of these works was high.	
		0				
			2	a) £67.5m to improve supplies to 6,250 worst served customer is £10,800 per customer, which seems high, but I am sure SSE[PD] has explored the value for money aspects. I appreciate that there may be a reduction in fault repair costs as a result of this work. None of the schemes are within [company name removed]'s area, so I have no further comment.		

Question 4: Do you think our proposals to reduce the number of worst served customers are reasonable? (Continued)

Stakeholder group	Stakeholder feedback				Feedback by stakeholder group	Summary of stakeholder feedback to question 4 and our response
	Yes	No	No response	Free text response		
Consumer Representatives	1				One customer representative who responded to this question thought that our proposals to reduce the number of worst served customers were reasonable.	
		0				
			4			
Trade Unions and affiliated bodies	0				No responses were received from trade unions and affiliated bodies.	
		0				
			0			
Supply chain and service providers	6			a) We also manufacture insulated overhead cables that could be of help when scheduling planned and unplanned outages. This could be of benefit to all.	Six supply chain and service providers responded to this question and they all thought that our proposals to reduce the number of worst served customers are reasonable.	
		0				
			0			
Landowners and Estates	0				One respondent from the landowner and estates category who responded to this question thought that our proposals in respect of reducing the number of worst served customers were unreasonable and also commented that they would like further information around how supply reliability will be improved for customers who do not fall within the definition of "worst served customers" but do experience an unreliable supply.	
		1		a) You have highlighted extreme rural communities, but what about rural communities elsewhere, where distribution is continually disrupted.		
			0			
Innovation Community	0				No members of the innovation community commented directly on whether or not the proposals were reasonable. However, they did raise the question of whether or not there was a need to consider if there would be benefit in having a "worst served connection customer definition".	
		0				
			2	<p>This is an interesting perspective and [company name removed] notes that one of these areas is in Orkney. [Company name removed] does feel however that whilst it is useful to focus on those with a service that is being interrupted, there is a great undeclared cohort of potential generators who are unserved. There are those who are seeking connection, but who cannot connect due to network inadequacies. In the case of Orkney there will be significant numbers of frustrated customers who cannot connect, however the priority given to their needs is not clear from this document and is probably underestimated/ reported.</p> <p>Taking the principle of 'worst served' as being a measure, [company name removed] would like to see a means to balance the investment needs of those who are occasionally frustrated by outages with those who are continuously frustrated by lack of connection, or occasionally through constraint in generation. At present it seems to only be the former group receiving much structured attention.</p> <p>[Company name removed] would therefore support the approach of tackling the problems of the 'worst served' but in the context that it is only part of the problem. [Company name removed] would contend that despite the extremely welcome work done on the RPZ that its community is possibly the 'worst served' in terms of frustrated connections. More work to prioritise this is now required.</p>		

Question 5a: Are we accurately capturing the service expectations of our customers?

Stakeholder group	Stakeholder feedback				Feedback by stakeholder group	Summary of stakeholder feedback to question 5a and our response
	Yes	No	No response	Free text response		
Customer	13				The majority of customers responding to this question agree that we are accurately capturing the service expectations of our customers.	Key Theme: The majority of respondents agree we accurately capturing the service expectations of our customers.
		3				
			13			
Connections	1				Connections customers who responded to this question were divided as to whether or not we are accurately capturing the service expectations of our customers.	Our Response: Our understanding of customers' expectations is gained through our Programmes of Listening for RIIO-ED1, our stakeholder engagement strategy and our day-to-day activities. This appears to be an effective way of understanding our customers' expectations and we will continue this approach throughout RIIO-ED1.
		1				
			1			
Government and Public Sector Organisations	2				Government and public sector organisations who responded to this question were divided as to whether or not we are accurately capturing the service expectations of our customers.	
		1				
Local Authority	4				All local authorities responding to this question agree that we are accurately capturing the service expectations of our customers.	
		0				
			4			
Emergency services and NHS bodies	0				No responses were received from emergency services and NHS bodies.	
		0				
			0			
Regulators	0				No regulators responded to this question.	
		0				
			1			
Energy Industry bodies	0				No responses were received from energy industry bodies.	
		0				
			0			
Energy supply companies	1				The energy supply company responding to this question agrees that we are accurately capturing the service expectations of our customers.	
		0				
			0			
Elected Officials	0				No responses were received from elected officials.	
		0				
			0			
Utilities	0				The two utility companies responding to this question disagree that we are accurately capturing the service expectations of our customers.	
		2				
			2			
Consumer Representatives	1				The customer representative responding to this question agrees that we are accurately capturing the service expectations of our customers.	
		0				
			4			
Trade Unions and affiliated bodies	0				No responses were received from trade unions and affiliated bodies.	
		0				
			0			
Supply chain and service providers	2				The two supply chain and service providers responding to this question agrees that we are accurately capturing the service expectations of our customers.	
		0				
			4			
Landowners and Estates	1				The landowner and estates respondent agrees that we are accurately capturing the service expectations of our customers.	
		0				
			0			
Innovation Community	0				No responses to this question were received from the innovation community.	
		0				
			2			

Question 5b: Are there any clear measures of good customer service we could adopt?

Stakeholder group	Stakeholder feedback			Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 5b and c and our response
	Yes	No	No response			
Customer	11			a) Recent problems in Arran and Mull of Kintyre, seem to highlight not being able to contact repair staff re what is happening! I assume trying by mobile phones, but not knowing who or where to phone. b) Yes – Reliable generation – Beware wind turbines. c) Yes. The people sitting in an office (Customer Service Team) can sometimes overlook small details which might improve customer relations. You can always ask customers advice, or a valued opinion of the whole workforce right down to the newest employee or customer.	The majority of customers who responded to this question think that there are clear measures of good customer service we could adopt. Whilst none of the respondents offered indicators we could use, they highlighted areas we could improve on in terms of being kept up-to-date on progress of fixing fault during an unplanned interruption, or to ask customers and staff for suggestions on ways service could be improved.	<p>Key Theme: A number of customers and stakeholders believed that there are clear measures of good customer service ranging from comparison with other organisations to traditional values and provided a variety of suggestions.</p> <p>Our Response: In forming our Business Plan we will be including proposals to improve our existing levels of service to customers for enquiries and following interruptions. We will be benchmarking our performance against other network operators. We will also be comparing our service with other organisations via the Institute of Customer Service. Improving Customer Service means that we will be actively engaging with our customers to make sure the changes we make will meet their needs.</p>
	2					
			16			
Connections	2			a) Would have thought there should be some benchmarks from international comparisons – also other sectors – eg gas & water	Two connections customers agree that there are clear measures of good customer service that we could adopt. One respondent suggested that we look at benchmarks used by other utilities nationally and internationally.	
	0					
			1			
Government and Public Sector Organisations	3			a) Use traditional forms of communication, such as letters to customers, rather than being over dependant on modern communication technology. Have postal questionnaires with competitions etc to motivate customers to respond. b) Automatic texting/email of updates on current faults to those customers affected.	Three government and public sector organisations agree that there are clear measures of good customer service that we could adopt. Whilst none of the respondents offered indicators we could use, they highlighted areas we could improve on in terms of being using traditional forms of postal communications and competitions to increase response rates to consultations; and another suggested increasing the use of automatic texts and emails to provide updates to affected customers.	
	0					
			4			
Local Authority	2			a) Important to maintain/develop liaison with local SSE[PD]/Hydro Board staff & communities. b) Improve speed to answer calls, checked 0800 300000 on 26/3/2013 – waiting time with music/advert/apology was 8 minutes.	Local authorities who responded to this question were divided as to whether or not there are clear measures of good customer service that we could adopt. Whilst none of the respondents offered indicators we could use, they highlighted areas we could improve on in terms of answering calls more quickly; improving communications with communities we deliver power to and recategorising the way in which we classify customers so that we think of them as demand customers and connection customers so that we can better meet their needs.	
	1					
			5	a) It is helpful to identify the different categories of customer (page 23). It would give added clarity to separate 'connections customers' into 'Demand customers' and 'generation customers'. There are a significant number of the latter in Orkney, and the number is likely to increase. The text in this section appears to be mainly about Demand customers. Generation customers, those planning micro-generation projects, have specific information requirements relating to connection possibilities and costs which have not always been met in the past.		
Emergency services and NHS bodies	0				No responses were received from emergency services and NHS bodies.	
	0					
			0			
Regulators	0				No regulators responded to this question.	
	0					
			1			
Energy Industry bodies	0				No responses were received from energy industry bodies.	
	0					
			0			
Energy supply companies	1			a) BUT: These will always change and cannot be a one off fix – it is a continuous journey. Always involve the affected in the fix – make sure their voice is continuously listened to.	The energy supply company responding to this question agrees that there are clear measures of customer service that we can adopt but that these will need to continually evolve to ensure that we meet our customers needs.	
	0					
			0			
Elected Officials	0				No responses were received from elected officials.	
	0					
			0			

Question 5b: Are there any clear measures of good customer service we could adopt? (Continued)

Stakeholder group	Stakeholder feedback			Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 5b and c and our response
	Yes	No	No response			
Utilities	0				The utility company who responded to this question felt that there was not a clear measure for good customer service that we could adopt. However, two respondents did suggest that we look at the measures adopted by ENW and WPD.	
		1				
			3	<p>a) ENW's approach would be a good measure to adopt</p> <p>b) My experience of SSE[PD] is that its managers do take customer service seriously and are keen to improve this by listening to feedback. I feel that SSE[PD] has further to go in embedding this within teams, and further training of staff in both regulatory and legal requirements, and technical knowledge would be beneficial, as well as cultural changes in some cases. I feel that Western Power Distribution have achieved this, but SSE[PD] have some way to go in this area.</p> <p>I have specific examples of where particular SSE[PD] staff I have dealt with have had inadequate technical knowledge to perform their duties, lacked awareness of SSE[PD]'s legal responsibilities under the ESQCR Regulations, and its regulatory responsibilities under its Distribution Licence Conditions. I am aware of the very thorough and modularised way in which Western Power Distribution implements the training of technical staff, and SSE[PD] might benefit from sharing of best practice.</p> <p>In [company name removed] we pride ourselves in providing an exceptional level of service to our customers. Any call to our publicised telephone numbers will go straight through a member of staff who will speak to the customer, offering the customer advice and raising an incident from the call. The incident will then be sent to the relevant department to manage the customer issue. This department will then take responsibility for the management of the customer expectations for the life of the incident. We do not use customer menu options or IVR systems or incoming calls from the public.</p>		
Consumer Representatives	0				No consumer representatives responded to this question.	
		0	5			
Trade Unions and affiliated bodies	0				No responses were received from trade unions and affiliated bodies.	
		0	0			
Supply chain and service providers	1				Supply chain and service providers who responded to this question were divided as to whether or not there are clear measures of good customer service that we could adopt.	
		1	4	a) We are suppliers of equipment, so we think these questions are not applicable		
Landowners and Estates	0				No landowners or estates responded to this question.	
		0	1			
Innovation Community	0				No responses to this question were received from the innovation community.	
		0	2	a) No comment		

Question 6: Taken together, do our proposals constitute good customer service?

Stakeholder group	Stakeholder feedback			Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 6 and our response
	Yes	No	No response			
Customer	14			a) Maybe expand on above comment.	The majority of customers responding to this question stated that our proposals constitute good customer service. One respondent agreed but would like us to make more information available.	<p>Key Theme: The majority respondents agree that our proposals constitute good customer service. Some respondents were keen to see more information about our level of service and our environmental performance.</p> <p>Our Response: In future we will be publishing an annual stakeholder report and this, combined with our annual Connections Report and Workplans for Connections, our annual report of our Business Carbon Footprint and the annual Electricity Distribution report published by Ofgem should address these requirements.</p> <p>Our Business Plan will include our forecast on future growth of Distributed Generation and adoption of Low Carbon Technologies supported by independent analysis and will also set out our proposals to assist renewable generation to connect. One stakeholder suggested a regional approach to customer service – primarily for connections. To address this our Business Plans will also include the proposal of specific Workplans for different customer groups which include our performance, customer feedback and how we have addressed these. We have already started this process with a Workplan for Distributed Generation customers on our web site (http://www.ssepd.co.uk/HaveYourSay/DistributedGeneration/). Another stakeholder suggested we should consider a self-service facility for IDNO's and ICP's. We are currently developing our website so any connections customer can request a quotation, pay and track progress of their enquiry on-line.</p>
		1				
			14			
Connections	1			a) Maintain interaction with customers as you're doing.	Connections customers who responded to this question were divided as to whether or not our proposals constitutes good customer service with one respondent commenting that we need to continue to engage with our customers.	
		1				
			1			
Government and Public Sector Organisations	3			a) Overall, yes given the reliability of the service. However highlighting what SSE[PD] is doing to help conserve and enhance protected landscapes, together with other environmental conservation work would be informative.	Three government and public sector organisations agree that our proposals constitute good customer service. One respondent would like us to provide more information around what we are doing to protect the environment.	
		0				
			4			
Local Authority	5			a) The principles are appropriate but the means of measuring performance are not entirely clear. Customer survey of timeliness and cost effectiveness of connections is useful, but needs to be supplemented by more objective measures. In respect of planning ahead, some measures of the growth of distributed generation and adoption of low carbon technologies need to be developed.	Five local authorities agree that our proposals constitute good customer service. However, one commented that how we will measure our performance is less clear. They also commented that we need to do more work around developing our measures for growth of distributed generation and adoption of low carbon technologies.	
		0				
			3			
Emergency services and NHS bodies	0				No responses were received from emergency services and NHS bodies.	
		0				
Regulators	0				No regulators responded to this question.	
		0				
			1			
Energy Industry bodies	0				No responses were received from energy industry bodies.	
		0				
Energy supply companies	1			a) Yes it is a good first step it does not fully fix the issue and no "one" fix ever will. There needs to be commitment to a continuous improvement plan.	The energy supply company who responded to this question agrees that our proposals constitutes good customer service but that we need to have a continuous improvement plan in place.	
		0				
			0			
Elected Officials	0				No responses were received from elected officials.	
		0				
			0			
Utilities	0				Three utility companies responded to this question with neither thinking that our proposals constitute good customers service. With one commenting that we needed to consider a self service system of ICPs and IDNOs. Another company who chose not to indicate whether they felt our proposals constitute good customer service or not; said that we needed to think about finding qualitative measures of good customer service too and highlighted Western Power Distribution's regional structure as best practice model for ensuring good service.	
		2		a) Promote self service for IDNOs and ICPs		
			2	a) I feel it is important to focus on the correct customer service measures, and not just KPIs based on business processes. For this reason, qualitative measures should be taken as well. For instance, although a DNO can take up to 60 days to respond to a generation connection enquiry, if every email or phone query too 60 days to answer, the process of connecting a generator would be unacceptable protracted. Western Power Distribution has a regional structure, with clear accountabilities. This results in phone calls to staff being answered and returned promptly, often by local rather than centralised staff. SSE[PD] might seek to look how Western Power Distribution manages interaction and where appropriate, share best practice.		
Consumer Representatives	1			a) Not everyone welcomes 'smart meters'. We have read our 2 meters for 20 years, each week, to check how our heat conservation measures are working!	One consumer representative responded to this question and agrees that our proposals constitute good customer service. They did comment that not every customer will want a smart meter.	
		0				
			4			
Trade Unions and affiliated bodies	0				No responses were received from trade unions and affiliated bodies.	
		0				
			0			

Question 6: Taken together, do our proposals constitute good customer service? (Continued)

Stakeholder group	Stakeholder feedback				Feedback by stakeholder group	Summary of stakeholder feedback to question 6 and our response
	Yes	No	No response	Free text response		
Supply chain and service providers	4			a) Recognising those who deliver their goods/services on time	Five supply chain and service providers responded to this and agreed our proposals constitute good customer service. As a supplier, one respondent felt the question was not applicable to them.	
		0	2	a) We are suppliers of equipment, so we think this question is not applicable		
Landowners and Estates	1				The landowner and estates respondent agrees that our proposals constitute good customers service.	
		0	0			
Innovation Community	0				No members of the innovation community indicated whether or not they thought our proposals constitute good customer service. However, one respondent did suggest that we should be demonstrating how much work we are doing to support renewable generation wishing to connect to our network.	
		0	2	<p>a) No comment on good customer service. However in terms of 'is there anything else we can be doing?' the answer is 'Yes'.</p> <p>[Company name removed] firmly believes that the rules set for electricity generation are out of date and slanted to favour carbon based sources. [Company name removed] contends this has to change and so your statement on Pg 25 that you cannot charge differently for renewable and non renewable generators needs to be highlighted. [Company name removed] firmly believes this out of date approach must be challenged and urges SSE[PD] to take this up with Government and Ofgem. [Company name removed] would be disappointed if SSE[PD] fell back on a defence that 'we cannot do this because Ofgem say we cannot' if there was not demonstrable effort to change Ofgem's mind.</p> <p>[Company name removed] has engaged itself with Ofgem and is well aware of its intransigence and unwillingness to lead towards the renewables based system we seek, however we believe SSE[PD]'s resources should be continuously used to illustrate the stupidity of not adopting a non-polluting approach.</p> <p>Regrettably the document does not give an indication of the work that SSE[PD] is doing in this arena and [company name removed] would take this opportunity to urge SSE[PD] to redouble their efforts given their high proportion of renewable generation capacity.</p>		

Question 7: Do our two fundamental connections principles capture the expectations of our customers?

Stakeholder group	Stakeholder feedback				Feedback by stakeholder group	Summary of stakeholder feedback to question 7 and our response
	Yes	No	No response	Free text response		
Customer	14	1	14		The majority of our customers agree that our two fundamental connections principles capture the expectation of our customers.	<p>Key Theme: The vast majority of respondents agreed that our connections principles capture the expectations of customers.</p> <p>Our Response: Several stakeholders suggested that we should incorporate additional connections information into our annual report – including levels of acceptance, contributions, existing capacity, times to reinforce and to connect. We plan to incorporate many of these requests into Our Annual Report, Our Annual Connections Report and Workplans for connections which will include specific key performance indicators with commitments to improve on stakeholders identified issues.</p> <p>Another suggestion was to make more use of innovative developments to facilitate lower-cost and more timely connections for generators. The Innovation Strategy section of our Business Plan will describe our plans in this area and outline some of the ideas we have already deployed including automatic loading schemes. One stakeholder with an interest in renewable generation suggested we should be more pro-active engaging with stakeholders and planning network developments further ahead to allow connection. Our Business Plan will include proposals to take a longer-term view with stakeholders and reinforce ahead of need in some instances where we are able to establish a definite requirement.</p> <p>A final suggestion from our stakeholders was that we ensure that the skills mix of our staff matched the challenges of smart and more complicated dynamic networks. Our Business Plan will include proposals on both the number and training of our staff going forward in order to address this.</p>
Connections	1	0	2	a) For major connections: Proportion of connection offers that were interactive. Proportion of connections offers that were accepted. The amount of investment paid by 3rd parties to implement connections. Average times taken to implement reinforcement works (banded by scale) Some measure of connection capacity by area i.e. how close to the limit the system is operating and whether just one additional connection will require massive work (sorry don't have the technical expertise to be more specific!)	One connections customer agrees that our two fundamental connections principles capture the expectation of our customers. In terms of how we can improve our annual connections report they suggested a number of areas that would be useful to major connections customers.	
Government and Public Sector Organisations	3	0	4	a) The amount of cable placed underground to reduce visual impact.	Three government and public sector organisations agree that our two fundamental connection principles capture the expectations of our customers. One suggested that our annual connections performance report should cover the amount of cable placed underground to reduce visual impact.	
Local Authority	5	0	3	a) These proposals appear to be comprehensive. b) Number of annual renewable energy grid connections listed by type, scale, and location	Five local authorities agree that our two fundamental connection principles capture the expectations of our customers.	
Emergency services and NHS bodies	0	0	0		No responses were received from emergency services and NHS bodies.	
Regulators	0	0	1		No regulators responded to this question.	
Energy Industry bodies	0	0	0		No responses were received from energy industry bodies.	
Energy supply companies	1	0	0		The energy supply company who responded to this question agrees that our two fundamental connection principles capture the expectations of our customers.	
Elected Officials	0	0	0		No responses were received from elected officials.	
Utilities	2	0	2	a) Easier to connect needs to be defined with a timescale. We are working with others to be able to process end to end within four weeks. This would be a real principle we would sign on to establish. a) There are areas of innovation that could improve connection performance, such as dynamic overhead line ratings and automatic load transfer, removing the cost and delays associated with network reinforcement. With greater levels of distributed generation, there needs to be a quick way of assessing network constraints for embedded generation, such as a maximum limited on export in the same way there has been for import on POCs on the SSE[PD] network. We also need greater visibility of where Neutral Voltage Displacement protection would be required for embedded generation since this additional cost can make some embedded generation schemes uneconomic at the onset. Finally, SSE[PD] might need to look at the skills mix for its staff engaged in providing a connections service, since a more complex dynamic network will undoubtedly require more graduate level staff rather than those solely "up from the tools". In [company name removed], we do promote "up from tools" but provide such staff with academic and technical training, including degree courses at the University of the West of England.	Two utilities companies agree that our fundamental connections principles capture the expectations of our customers. In terms of things they would like us to include in our annual performance report they would like us to include how innovations have improved connection performance. In addition to this, one respondent would like greater visibility of our networks and standards which apply to generation connections. As the level of complexity increases they suggested we give enhanced training to our staff.	

Question 7: Do our two fundamental connections principles capture the expectations of our customers? (Continued)

Stakeholder group	Stakeholder feedback				Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 7 and our response
	Yes	No	No response				
Consumer Representatives	1					The customer representative who responded to this question agrees that our two fundamental connection principles capture the expectations of our customers.	
		0					
			4				
Trade Unions and affiliated bodies	0					No responses were received from trade unions and affiliated bodies.	
		0					
			0				
Supply chain and service providers	3			a) We also manufacture insulated overhead cables that could be of help when scheduling planned and unplanned outages. This could be of benefit to all.			
		0					
			3	a) We are suppliers of equipment, so we think this question is not applicable			
Landowners and Estates	1					The landowner and estates respondent agrees that our two fundamental connection principles capture the expectations of our customers.	
		0					
			0				
Innovation Community	0					A representative from the innovation community suggests that we should indicate the number of connections we are expecting on our network.	
		0					
			2	<p>a) Connection Principles. Overall these principles make sense as far as they go, but there has been a tendency to fail to look far enough ahead in some respects. The burgeoning of renewables in Orkney was widely touted and discussed over years, but still the grid moratorium was introduced with little or no prior notice. [Company name removed] would argue that planning has been heavily influenced by past experience with insufficient attention to horizon scanning.</p> <p>The planning underway does not seem to have complete visibility of all likely opportunities. Items only seem to qualify for consideration when close to a connection offer, whereas there is an unparalleled opportunity to build a fully sustainable energy supply system by looking ahead. [Company name removed] would contend that the smart grid work done to date is welcome, but is a pale shadow of what it could and indeed must be for a sustainable energy system. [Company name removed] believes Orkney is willing and able to bring support to initiatives by SSE[PD] and others to build this new approach.</p> <p>[Company name removed] would urge SSE[PD] to look to its heritage and the work done by Tom Johnston and others in the initial electrification of its area to show the change that was brought about by vision and assiduous application. [Company name removed] would like to see a renaissance of this sort of approach and would strongly support SSE[PD] if it chose this mantle.</p>			

Question 8: What are your views on our proposals to measure and reduce our business environmental footprint?

Stakeholder group	Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 8 and our response
Customer	<p>a) I am impressed that so many aspects are always being reviewed.</p> <p>b) Quite a task. But as everyone in the land are tightening their belts, please remember to involve and collect the opinions of all employees before putting economy and cost cutting measures into effect. Quote old Scots saying (Every mickle mak's a muckle) N.E.Scotland. Every small saving making a large saving at the end of the day.</p>		<p>Key Theme: Most stakeholders have made positive comments on our proposals to measure and reduce our business environmental footprint.</p>
Connections	<p>a) Investigate the potential positive and negative impacts of distributed generation on electrical distribution losses. Continue to develop energy storage solutions (as I understand being trialled on Shetland).</p>	<p>The business environmental footprint should consider positive and negative impacts of distributed generation on electrical distribution losses.</p>	<p>Our Response: One stakeholder expressed the view that we should investigate the potential positive and negative impacts of distributed generation on electrical distribution losses and continue to develop local energy storage solutions to reduce losses. Through Ofgem's Innovation Funding Incentive (IFI) mechanism we are investigating a range of methods to reduce network losses.</p>
Government and Public Sector Organisations	<p>a) Other environmental issues – The implementation of all undergrounding projects requires careful consideration and planning to ensure that the route and operation of undergrounding itself does not negatively impact on all aspects of the natural environment, in particular on important landscape or heritage features, or on habitats and species.</p> <p>The presence of power lines across the landscape poses risks to birds from collision and electrocution, with collision likely to be the greater risk. The groups of birds that are most susceptible to collision are waterbirds such as herons, cranes, waders, ducks and geese along with birds of prey. Power lines and any associated infrastructure can also be a source of 'clutter' in the landscape. This can contribute to a negative impact for some bird groups such as breeding waders that require open landscapes and unrestricted lines of sight.</p> <p>It does not appear that the presence of power lines on their own leads to bird mortality at such a level to cause a population decline. But some species are more vulnerable than others, for example, all swan species, and the presence of power lines may interact with other variables across the landscape or on specific sites to contribute to population declines. There are a range of mitigation measures that can be considered to reduce the collision risk such as coloured markers, deflectors or perch guards. For key breeding wader sites, consideration should be given to placing cables underground to minimise impacts.</p> <p>Decisions regarding the location of power lines should take into account the following factors:</p> <ul style="list-style-type: none"> - presence and proximity to designated sites such as SSSIs, SPAs, Ramsar sites and the bird features for which they are notified. Larger coastal and freshwater wetland sites require particular attention as they carry higher risk. - movements of birds across the landscape/site such as migration routes and local flight paths, including a consideration of landscape/topographical features that may act as funnels for movements of birds such as headlands, river valleys and ridge lines. <p>[Company name removed] has produced an information note on this issue: http://neintranettechnical/content/technical/topics/wiki.asp?WK=914&SRH=overhead+pover+lines</p> <p>It is beyond the scope of this response to provide detailed advice regarding bird surveys for power line projects. However, in order to adequately assess the potential impacts on bird populations, comprehensive bird surveys should be undertaken to identify the risks involved, especially where proposals may affect the birds associated with any designate sites such as SSSIs, SPAs and Ramsar sites."</p> <ul style="list-style-type: none"> • It is good to see SSEPD measuring its environmental footprint and taking steps to address key issues of concern. It is important that SSEPD reports on progress on reducing its environmental footprint and makes these reports public. In addition, in order to ensure continuous improvement, SSEPD should update both targets and practice on current components of the environmental footprint as well as address new concerns when they arise. • This should include a measure on landscape impact. Major development should not take place in a protected landscape, or its setting. Furthermore we are concerned as to the landscape impact of minor renewable energy development within protected landscapes. Where ever possible, wind turbines should be avoided. Having wind turbines on the landscape is part of SSE's footprint on the environment, alternative renewable energy generation, such as photovoltaic outside protected landscapes and their setting, tidal and wave energy, water treatment works methane capture and use and bio mas should all be considered. • These look fair reasonable & achievable • The section on legislation is quite comprehensive in the range of legislation mentioned, even if – for reasons of space – it doesn't go into much detail on the requirements of each regulation. However, there is no mention of the legislation to protect SSSIs that are not also Natural sites. Thus, the second bullet point in the list on page 30 could be amended to read: "Regulations arising from the European Habitats and Birds Directives, measures to protect Sites of Special Scientific Interest and specific species protections (such as birds, deer, badgers, seals) that mean we need to put in place special protection while we are working." • Environmental Legislation – In this section, in addition to the Electricity Act 1989 and the subsequent agreement by electricity distribution networks and Ofgem on undergrounding projects in AONBs (Areas of Outstanding Natural Beauty) and National Parks (NPs), SSEPD also have a general duty of 'regard' to the statutory purposes of AONB and NP designations. This is expressed in Section 85 of CRoW and Section 11A(2) of NP and Access to Countryside Act (1949), as amended by section 62(2) of the Environment /act (1955), and re The Broads, Section 17A of the Norfolk and Suffolk Broads Act 1988 (as inserted by section 97 of CRoW Act 2000). Defra has produced related guidance: http://archive.defra.gov.uk/rural/documents/protected/npaonb-duties-guide.pdf and [company name removed] has provided additional guidance on best practice which includes a case study on undergrounding (case study 16). http://publications.naturalengland.org.uk/publication/30037?category=31019 EPD sustainability objectives and targets – We suggest that an objective and target be included for the extent of positive natural environment projects implemented. I.e. undergrounding, other landscape improvement and biodiversity mitigation projects implemented. • I believe the SSEPD sustainability objectives and targets cover a number of key environmental areas and show a strong commitment by SSEPD to achieve significant changes by 2020. 	<p>A range of issues were raised by government and public sector organisations including: a) decisions regarding the location of power lines b) the need to report on progress and review targets c) measure landscape impact and specifically within designated areas</p>	<p>Our Response: One stakeholder expressed the view that we should investigate the potential positive and negative impacts of distributed generation on electrical distribution losses and continue to develop local energy storage solutions to reduce losses. Through Ofgem's Innovation Funding Incentive (IFI) mechanism we are investigating a range of methods to reduce network losses. This project will take account of a range of demand and generation scenarios, including the introduction of additional distributed renewable generation. More specifically, our Community Demand Management core focus innovation for RII0-ED1 will actively manage local demand to enable the connection of local renewable generation and potentially reduce electricity distribution losses.</p> <p>As part of our Northern Isles New Energy Solutions project we are trialling local thermal energy storage and demand-side management, which coordinates distributed generation and demand from domestic water and space heating devices. This will provide learning about the potential for local energy storage to reduce network losses. In addition, as part of our Thames Valley Vision project we are deploying distributed battery storage with power electronics to provide learning on reducing losses and supporting voltage.</p> <p>Several stakeholders raised concerns about visual amenity proposals and the need to ensure undergrounding does not impact on other aspects of the environment, the desirability of consulting with local authorities on visual amenity issues, the need to mitigate impact of our networks on historic environments and the positive benefit to certain groups of bird life of undergrounding. We will ensure these issues continue to form part of our criteria for undergrounding.</p>

Question 8: What are your views on our proposals to measure and reduce our business environmental footprint? (Continued)

Stakeholder group	Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 8 and our response
Local Authority	<p>a) The proposals for engaging with local communities are sensible, but acknowledgement of the planning responsibilities and interests of local authorities is called for. The Council takes its responsibilities for visual amenity seriously and would expect to be consulted on proposals affecting it.</p> <p>b) Less reliance on over development of wind farms impacting on environmentally sensitive areas and sites and limited generation when no wind and in winter when heavy icing and heavy wet snowfall. More emphasis on micro and macro generation closer to consumers and away from environmentally sensitive and designated areas. Better use of storage of water to generate power when there is high demand. SSE[PD] can demonstrate its responsibility to improving/ managing it's environmental footprint.</p> <p>c) Reducing the environmental footprint of your key infrastructure and activities makes good business sense, and it will also benefit your customers and stakeholders, and generally help raise awareness of this issue.</p> <p>d) Insufficient information to comment.</p> <p>e) In terms of environmental standards, these should consider and appropriate mitigation of impacts on the historic environment. This is currently achieved through an established consultation process which we would hope would be maintained in any new strategy.</p> <p>f) I am concerned that what is promised and what happens do not match. E.g. The Beaulieu-Denny Electricity Transmission Line seemed to lean too far to the commercial rather than environmental factors involved.</p>	A range of issues were raised by local authorities including: a) the need to consult local authorities on visual amenity b) mitigate impact on historic environment c) consider the environmental cost of a development.	<p>Another stakeholder suggestion was that we should report publicly on our progress reducing our business carbon footprint and that in addition to internal targets we should look outwith the business too e.g. decarbonisation of UK economy. We already publish our business carbon footprint on an annual basis, and intend to publish an annual report on our environmental performance and Business Carbon Footprint.</p> <p>On the topic of electrical losses, suggestions included splitting these into "technical system" losses and theft, replacing higher-loss electrical equipment with low-loss equivalents where it is economic to do so, all of which are activities which are already being undertaken.</p>
Emergency services and NHS bodies		No responses were received from emergency services and NHS bodies.	
Regulators		No regulators responded to this question.	
Energy Industry bodies		No responses were received from energy industry bodies.	
Energy supply companies	a) This is a current and long term "must have". It has many benefits that make this focus add value to the total business. Environmental issues need to be visibly and actually as important as safety – perhaps we need a parallel environmental family behaviour change programme.		
Elected Officials		No responses were received from elected officials.	
Utilities	<p>a) Environmental impact is important to [company name removed], and we have taken a number of initiatives. One of these is exploring the use of Electric Vehicles, and we would be pleased to discuss this further with SSE[PD] to see if we could share charging infrastructure and technologies.</p> <p>With regards to oil filled cables, other technologies such as rapid leak detection using chemical tracers such as Femtrotrace and cable joint refurbishment could be looked at, as has been the case with another DNO that reduced its capital spend in DPCR5, as well as disruption to road users, as a result.</p> <p>Electrical losses are an important area, although the highest proportion has traditionally been in the LV network in which loss reduction might be more difficult. A whole life approach needs to be taken to low loss transformers. Regulatory changes such as requiring DNOs to purchase network losses from the wholesale energy market might drive a commercially driven pragmatic approach for all DNOs.</p> <p>b) Sound sensible and will hopefully reduce overall costs</p>	A range of issues were raised by utilities including: a) the use of electric vehicle b) consider rapid leak detection using chemical tracers and cable joint refurbishment d) consider the lifetime cost of the investment	<p>Stakeholders from our supply chain suggested that extending the life of transformers by refurbishment had a positive environmental benefit, and this approach is consistent with our current policy and will continue in RIIO-ED1. They also suggested that we could recycle and/or reuse old cable. This is an option which deserves further consideration and we may progress this in future.</p> <p>Another utility stakeholder suggested the use of electric vehicles as an opportunity to reduce our environmental impact. We currently have a number of these vehicles in use and have installed charging points at many of our offices. We are also involved in joint ventures to install charging points at other locations. The same stakeholder suggested use of chemical tracers to simplify leak location on oil filled cables, a technology we already employ.</p> <p>Stakeholders also suggested we should consider the lifetime and environmental cost of investments in our decision process. This is consistent with our current policy and we plan to continue this through RIIO-ED1.</p>
Consumer Representatives	a) Looks OK		
Trade Unions and affiliated bodies		No responses were received from trade unions and affiliated bodies.	
Supply chain and service providers	<p>a) As indicated above we believe that extending the age of primary distribution and inter-bus transformers is a very credible thing to be doing from an environmental perspective. We would like to see tangible incentives for SSEPD linked to transformer life extension.</p> <p>b) The proposals appear to cover the range of environmental impact, however on the electrical losses if an undefinable high proportion is theft of electricity then future installation of efficient low loss plant may not show the full effect of the reduced losses. It may be better to split the electrical losses into two categories -system losses and theft.</p> <p>c) At [company name removed] (Parent company of Copper Cable Company) we have invested in a cable recycling plant which would offer potential opportunities between both parties to recycle/reuse old cable when replacing the underground/overhead cables. We also manufacture insulated overhead cables that could be of help when scheduling planned and unplanned outages. this could be of benefit to all.</p> <p>d) We think that your proposal to replace equipments with high electrical losses with modern low losses equivalents is an adequate measure. The implementation of this measure will have impact on equipment costs.</p> <p>e) Well centred</p>		
Landowners and Estates		No responses were received from landowners and estates.	

Question 8: What are your views on our proposals to measure and reduce our business environmental footprint? (Continued)

Stakeholder group	Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 8 and our response
Innovation Community	<p>a) Environmental Footprint: As stated elsewhere; the proposals you have are necessary, but are missing the main point. So as a first step [company name removed] endorses the targets in Fig 12. however, the shortcoming is that these targets are internally focussed. So if they are just one side of the action then they are adequate. If they are the whole picture they are wholly inadequate.</p> <p>The presently missing side must be that you are providing a service that allows the de-carbonisation of the UK economy. This must be given significant weight and is frankly going to eclipse your own impact.</p> <p>Theft: Another area where there is inappropriate mixing of topics is in the losses from the system. (Pg32/33). There are clearly losses through heat that is an inevitability of physics of conveying electricity and also some indication of efficiency of operation. However the bulking of these losses with theft is unhelpful. To be blunt: theft is a problem for your shareholders, not the wider community. You need to get this sorted out as it is a direct drain from your bottom line. To conflate this with losses that require technical solutions is misleading. [Company name removed] would therefore like to see your theft losses reported separately from your inefficiency losses.</p> <p>Loss profile: It would also be useful to be able to better understand the loss profile across the network. It is inevitable that losses will be higher in Orkney than in areas of southern England due to distribution distances and climate. Such losses may need to be tackled, or avoided by different distribution/use strategies. However it is also inevitable that such improvement schemes will need to be justified in the future on a cost/benefit basis. Better, open understanding of losses as an enabler for change will therefore become increasingly helpful. Whilst possibly not an item that requires huge public reporting, a more transparent loss register would be of value to help justify schemes in the future.”</p> <p>b) Thank you for the opportunity to respond to your consultation paper on your plans for the future. As a membership organisation exclusively interested and involved in renewable energy and fuel conservation your plan is of particular interest to us.</p> <p>Orkney has a long history of working with SSE[PD] on a number of fronts over the years. [Company name removed] believes that this partnership has led to the high levels of renewable generation on the islands we see today. (presently supplying >125% of Orkney’s electricity demand as this response is being typed). [Company name removed] believes that the willingness shown by SSE[PD] to consider reasoned arguments and to then challenge perceived opinions has already led to significant benefit in the community. This led to the creation of the Registered Power Zone which is bringing significant income to the county and is a perfect example of how orthodoxy can be challenged and market opportunity created. [Company name removed] is confident there are many other such opportunities.</p> <p>Consultation Process: [company name removed] is pleased to see that this consultation has clearly been done very thoroughly. In our experience the openness of the process is critical and therefore encourages engagement. The fact that you have re-consulted on your plans to ensure you are getting this right is particularly welcome. It would have been easy enough to consult superficially and plough on. [Company name removed] is pleased to see you have publicly surfaced some aspects that require greater understanding and clarity.</p> <p>The comments made below specifically aim to build upon the open dialogue that we believe we have with SSE[PD]. This letter has been circulated to the membership and will be posted on the [company name removed] website at www.oref.co.uk along with any reply.</p> <p>Above all else: Building a sustainable community requires an enormous number of reliable inputs. Energy is clearly one of them. There is, however, a tone within the document that is discordant with [company name removed]’s view as to the importance of the environment in a sustainable community. The efficient use/distribution of energy is fundamental, but the references to environmental improvements seem to point to less fundamental items. Simply putting flood defence/reduction in oil filled cables, undergrounding and diesel generator maintenance into the environmental category is odd. The effect of energy generation presently is enormous though carbon dioxide production and the document seems to fail to articulate this. The biggest environmental effect SSE[PD] will achieve will be the cessation of carbon emission and full scale commitment to renewables. To fail to state this is worrying. This business planning round provides the opportunity for more than just business as usual. It provides the moment when everything can change.</p> <p>[Company name removed] therefore strongly urges that a more holistic view is taken of the opportunities presented by the scale of renewables as this will fundamentally disrupt the perspective of ‘the environment’ as an add on.</p> <p>Five Priorities: [company name removed] is confused as to how the 5 priorities stated fit with the ‘Potential other priorities based on responses to Our First Consultation’ (Fig 1). If the font size of the text in the figure is taken to indicate the level of support it would show that ‘low carbon, generators, renewable’ are the three biggest text. It is not clear however how the 5 selected would rank against these ‘Others’.</p> <p>[Company name removed] is therefore concerned that these ‘Others’ are not being given a fair weight within the document and therefore business planning.</p>	<p>A range of issues were mentioned including: a) the targets in the report are all internally focussed and need to look outwith the business too e.g. decarbonisation of UK economy b) separate out electrical losses from electrical theft c) consider a loss register</p>	

Question 8: What are your views on our proposals to measure and reduce our business environmental footprint? (Continued)

Stakeholder group	Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 8 and our response
	<p>Safety: In addition [company name removed] is concerned that the top priority stated 'A safe supply of electricity' has been misinterpreted as an endorsement that SSE[PD] needs to put its staff safety at the top of its plan. [Company name removed] does not support the priority that this plan gives to SSE[PD]'s own staff safety. This is not to say that [company name removed] wishes SSE[PD] to put its staff at risk, but the prominence given in this outward facing document to your internal safety processes is at odds with the consultation intent of the document. As a company you have your own systems and processes that you need for good governance and these are taken as a given. There is no need to consult upon them. If a charitable view is taken of their inclusion it would be that there was confusion in the intent of the document. If a more cynical approach was adopted then it could be argued that their inclusion pads the document and seeks to draw attention away from the comparatively thin areas where innovation is not being well funded and the targets are unexceptional.</p> <p>Fuel Poverty: Where safety fails to be mentioned is that associated with the need to provide affordable heat to those in financial difficulties. Cold/damp kills. There are real and important issues around fuel poverty and [company name removed] is disappointed that the document is largely silent upon this (except Pg 25).</p> <p>As a 'renewable rich' community [company name removed] would like to see a better mechanism by which the energy harvested locally can be used locally. That will require investment and effort on the part of the community, but also significantly [company name removed] believes this should be by SSE[PD]. As a company harvesting energy from within the community [company name removed] would like to see greater commitment by SSE[PD] to supplying energy at times of bounty to those in real need. The passing reference on Pg 25 to controllable energy systems provides some comfort, but it is more scant than [company name removed] would like to see.</p> <p>Expense of the Environment: [company name removed] believes that the inclusion of this as a priority is important, but fears it is being misinterpreted. This is not/should not just be corporate 'green wash'. It is fundamental to your business. To be frank; you are one of the few businesses that can actually deal with environmental issues.</p> <p>You have within your generation fleet a significant amount of renewables and you need to move to a zero carbon generation system as quickly as possible. Please do not just limit your interpretation of 'our activities are not carried out at the expense of the environment' to just mean you don't pollute as much as the rest. You have the opportunity and obligation to be the best and provide the rest of society with a pollution free energy source that will enable us to deal with the rest of our issues. Please do not limit your aspirations. [Company name removed] would support you pushing much harder on this and accelerating your already remarkable progress.</p> <p>Value for money: [company name removed] find it surprising that this is in your priorities. This is taken as a given for any company that wishes to survive. So whilst it is a necessity, [company name removed] would not specifically see this should be here above the 'Other' items in Fig 1.</p> <p>Low Carbon capability: [company name removed] is pleased to see that the majority (83%) of respondents supported preparing the grid for a low carbon future (Pg 10). The recognition that electric heat and vehicles will become increasingly important is welcome. It does appear to be at odds however with the earlier statement on Pg 10 that there will be a reduction of 26% in total electricity demand by 2030 though efficiency. [Company name removed] would question this as it sees no sign of a reduction in electrical demand, only an increase as the electrification of heat and transport is rolled out. [Company name removed] would therefore like to see SSE[PD]'s own modelling of demand rather than rely upon the Government's Efficiency Strategy that would appear to be flawed.</p> <p>Dealing specifically with the issue of the need to shift fuels: [company name removed] expects that there will be a major electrification of heat and transport in Orkney in the coming years. Work is underway to quantify this including a public meeting on the 10th of May, but it is inevitable that the existing electricity infrastructure will be too small to cope and will require major reinforcement, possible a trebling or more of capacity. [Company name removed] is concerned that this inevitable growth is not a major plank of SSE[PD]'s future plans.</p> <p>[Company name removed] can foresee huge changes needing to be brought in and is seeing little attempt to future proof new investment. (The increase in cable capacity to Rousay and Westray being notable exceptions). [Company name removed] therefore firmly believes that this planning cycle must explicitly acknowledge the changes coming and be ready to invest to keep infrastructure ahead of need.</p>		

Question 8: What are your views on our proposals to measure and reduce our business environmental footprint? (Continued)

Stakeholder group	Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 8 and our response
	<p>Up-front Investment: [company name removed] strongly agrees with the stated (and demonstrated) commitment to work with local stakeholders to make investments ahead of need where commitment is shown. (Pg 11). This has worked to an extent over the years in Orkney and benefits across the County are being seen. However [company name removed] would like to see that the 'commitment' is more widely defined. Orkney has been investing in renewables for years and the recent burgeoning of micro-renewables is testament to the millions invested by local people. (Estimated to be in the order of £20M for the 4MW installed to date). [Company name removed] would argue that this represents commitment. However SSE[PD]'s definition of commitment would appear to be limited to the application for connections and associated fees.</p> <p>[Company name removed] believes that there is an elevated level of commitment that is probably unparalleled in the country and therefore urges SSE[PD] to expand its definition of commitment. With such recognition in place [company name removed] believes this would empower SSE[PD] to act more imaginatively and secure greater and sustainable business.</p> <p>Dealing specifically with your questions is difficult and leads off into other areas. For ease of analysis the questions are answered in order, but some issues do not fit entirely within your questions, but are placed approximately where they appear in your document.</p> <p>Conclusion: [company name removed] believes that you need to go further faster and recognises this will not be without short term cost, but [company name removed] believes the long term effect of such investment will be a more sustainable community and more sustainable companies that serve it.</p> <p>[Company name removed] looks forward to working more extensively with SSE[PD] in the coming exciting years.</p> <p>1) http://161.12.255.131/Boardload/Orkney.asp 2) There may be reductions at the meter, but there is also an increasing level of home generation that is resulting in increasing consumption and fuel displacement of oil to electricity. This is to be encouraged even though it is not an SSE[PD] responsibility."</p>		

Question 9: Do you support our stakeholder-led approach to address concerns around visual amenity?

Stakeholder group	Stakeholder feedback			9b) If not, please explain why.	Feedback by stakeholder group	Summary of stakeholder feedback to question 9 and our response
	Yes	No	No response			
Customer	15			a) In Aberdeenshire wind turbines are put up everywhere it is almost madness! Public opinion counts for nothing so why bother about visual amenity.	The majority of customers support our stakeholder-led approach to address concerns around visual amenity.	<p>Key Theme: The majority of respondents support our stakeholder-led approach to address concerns around visual amenity. Although, several stakeholders were concerned that funding of undergrounding might be at the expense of improvements in reliability or connecting low-carbon generation.</p> <p>Our response: The Ofgem scheme allocates specific funding to this activity and thus it does not affect funding of other activities such as those mentioned. One stakeholder mentioned the option of using funding to provide screening for overhead lines, although this is outside the scope of the current scheme.</p> <p>Another stakeholder expressed the view that the Area of Outstanding Natural Beauty management body should be involved in prioritising areas for undergrounding. We consider their experience invaluable and look forward to working closely with them in RIIO-ED1.</p> <p>One stakeholder was concerned that our proposals did not specifically include the impact of networks on heritage/historic sites. We fully appreciate the potential impact of undergrounding on the historic environment and will always look to preserve this.</p>
		1				
			13			
Connections	1				The connections customer responding to this question supports our stakeholder-led approach to address concerns around visual amenity.	
		0				
			2			
Government and Public Sector Organisations	4			<p>a) [Company name removed] supports the stakeholder-led approach to address concerns around visual amenity and applauds SSEPD's ambitions to be the industry leader in this area. As demonstrated by the supporting example, stakeholder engagement should specifically include liaison with environmental specialists and protected landscapes partners to ensure that the allocation of funds for projects will achieve the best outcomes for landscape, biodiversity and communities.</p> <p>[Company name removed] welcomes the emphasis on this issue, and the associated proposal to support positive landscape improvement initiatives. We suggest that the scope of such activity should be widened to include other activity, such as 'screening' where undergrounding is not an option.</p> <p>It is worth noting that in addition to the regional power company allocations for undergrounding work in AONBs and NPs, National Grid has now significant funds to spend to support landscape enhancement projects from April 2013. We suggest that visual amenity impacts informed by landscape character assessment should also be considered and addressed outside of designated areas.</p> <p>[Company name removed]. Projected Landscape partners and UK Power Networks have developed a valuable way of working together and we commend this approach. This leaflet explains how the South and South Eastern Undergrounding Steering Group operates: http://www.naturalengland.org.uk/images/underground-electricity-infrastructure_tcm6-34569.pdf</p> <p>b) The approach set out in SSEPD's supporting document 'Our proposals for visual amenity' is helpful as a general approach on this issue. However, it is important to be aware that other natural heritage interests may also be present in many of the parts of Scotland where the electricity transmission and distribution network might be judged by some to have a detrimental impact on visual amenity. These interests – in particular, semi-natural habitats – may suffer adverse impacts if the current overhead-line infrastructure is replaced by underground cables. For example, this is particularly the case where the hydrology of wetlands, peatlands and similar water-dependent areas is permanently or temporarily affected by undergrounding of cables.</p> <p>In the case of new infrastructure, the visual impacts can often be reduced by careful routing of the lines. Again, if there is likely to be an effect on habitats or wildlife species the impact of this has to be balanced against the reduction in visual impact.</p> <p>It is also important to take into account the cumulative impact of work to develop the transmission and distribution network. Such cumulative impacts may arise from combinations of projects to develop the network – or they may be as a result of combinations of network-improvement projects and other developments such as wind farms, road and rail projects or new buildings.</p> <p>Thus, there is a need to carefully assess each case where there are proposals for undergrounding of current or new network infrastructure. The countryside in Scotland is very diverse and some areas habitat may recover relatively quickly from such disturbance while others may never fully recover.</p> <p>c) SSE[PD] could do more, such as having a policy on not building or using wind turbines or photovoltaic arrays in protected landscapes or their setting.</p>	Four government and public sector organisations support our stakeholder-led approach to address concerns around visual amenity. With one respondent suggesting that the approach could be extended to screening.	
		0				
			3			

Question 9: Do you support our stakeholder-led approach to address concerns around visual amenity? (Continued)

Stakeholder group	Stakeholder feedback			Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 9 and our response
	Yes	No	No response			
Local Authority	5			<p>a) The Council welcomes the fact that the increase in costs, which have to be borne by customers, has been kept to a minimum. It is noted that the anticipated increase in expenditure is due mainly to the roll out of smart meters and the remedial actions for areas of worst served customers, both of which the Council supports.</p> <p>b) BUT: More emphasis on reducing the impact on location of large “windfarms” in areas of high visual amenity, environmental designation and wildland.</p> <p>c) In the south of England all proposed ‘Ofgem funded’ undergrounding schemes within the protected landscape ‘SSE[PD] distribution network area’ are subject to an initial assessment by the appropriate AONB or National Park management body. This enables priorities for investment to be drawn up. We would be concerned if schemes could be suggested direct to SSE[PD] by a much wider group of people, as appears to be suggested in the second paragraph of ‘Our Approach – to Visual Amenity’.</p> <p>d) The Board has examined the supporting documentation and considers that its involvement in bringing suggested undergrounding schemes to the attention of SSE[PD] fulfils the principles of SSE[PD]’s approach to visual amenity. As a result the Board considers that SSE[PD]’s stakeholder-led approach to addressing concerns around visual amenity is proportionate and appropriate and trusts that it will continue into further review periods in the future, and that the Board will continue to be involved.</p>	Five local authorities support our stakeholder-led approach to address concerns around visual amenity. One suggests that the Area of Outstanding Natural Beauty or National Park management body could be used to prioritise areas which could be considered.	
		0				
			3	a) Very concerned that consultations are not genuine. (A recent one from Scottish Water certainly wasn’t).		
Emergency services and NHS bodies	0				No responses were received from emergency services and NHS bodies.	
		0				
Regulators		0			No regulators responded to this question.	
			1			
Energy Industry bodies	0				No responses were received from energy industry bodies.	
		0				
Energy supply companies		0			One energy supply company responded to this question and supported our stakeholder-led approach to address concerns around visual amenity.	
	1			a) It’s an excellent approach and needs to remain a programme as is different from a project.		
Elected Officials		0			No responses were received from elected officials.	
			0			
Utilities		1			Opinion was divided amongst utilities responding to this question. With one commenting that spending the money on worst performing networks might have more economic benefit.	
			2	a) We think is difficult to justify replacing overhead lines with underground cables solely on the grounds of visual amenity. This money could be better spent on improving the worst performing networks which might have more economic benefit.		

Question 9: Do you support our stakeholder-led approach to address concerns around visual amenity? (Continued)

Stakeholder group	Stakeholder feedback				Feedback by stakeholder group	Summary of stakeholder feedback to question 9 and our response
	Yes	No	No response	Free text response		
Consumer Representatives	0					
		1		a) You must be careful not to be over-persuaded by enthusiastic environmental bodies that visual amenity is all-important. Big fuss when line to Skye erected – now, nobody notices!!		
			4	<p>a) Although there are a number of references to the environment throughout the consultation document, these focus very much on the natural environment and we were disappointed that similar weight has not been given to the historic environment. Furthermore, only those regulators who deal with the natural environment are listed on page 30 and the role of organisations such as English Heritage and Historic Scotland also need to be recognised. We do, however, acknowledge the reference to archaeology together with historic and listed buildings in the supporting document headed 'Our proposals for visual amenity'.</p> <p>Within the Government's National Planning Policy Framework (NPPF) the historic environment is defined as 'all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed fora'.¹</p> <p>Furthermore heritage assets are described as a 'building, monument, site, place, area or landscape as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)'.</p> <p>We would therefore expect your Business Plan for the period 2015 to 2023 to recognise the significance of the historic environment in accordance with the definition given in the NPPF and set out clearly the actions that Scottish and Southern Energy Power Distribution propose to take to avoid or minimise any detrimental impacts on the historic environment.</p> <p>Such impacts could affect historic landscapes in rural and urban areas, individual heritage assets including those that are afforded statutory protection and their setting as well the public realm (which may incorporate historic street surfaces) together with buried archaeological remains.</p> <p>Developments such as overhead transmission lines, pylons, new cables and the undergrounding of existing lines, substations, etc, may have adverse or positive benefits (where they are carefully designed) on the historic environment. We note that four of the eleven proposed schemes identified on page 21 of the consultation document are located in England together with your initial proposals to enhance visual amenity which could result in the re-routing or placing of existing transmission lines underground.</p> <p>By ensuring that the historic environment is fully considered when Scottish and Southern Energy Power Distribution are developing their plans it is often possible to avoid or minimise possible risks thereby reducing costs and delays at a later stage in process. It is also possible that opportunities may be identified where proposed plans will provide positive benefits to the historic environment and/or individual heritage assets.</p> <p>We would therefore expect Scottish and Southern Energy Power Distribution to take full account of the historic environment in all their plans and proposals, to assess the possible impacts and, where appropriate, put in place a mitigation strategy that is proportionate to the significance of any heritage assets affected. For England, this should be done in consultation with [company name removed] and the local authority historic environment officers (including both archaeological and historic building conservation officers) as early in the process as possible.</p> <p>We want to continue working with Scottish and Southern Energy Power Distribution to ensure the Business Plan for 2015 – 2023 takes full account of the historic environment in accordance with the comments given above. This could be further improved if Scottish and Southern Energy Power Distribution established a series of regular meetings perhaps involving all the statutory environmental bodies to discuss current and future plans. If it would be helpful we are also prepared to comment on your existing Scheduled 9 Statement to ensure it is in line with current good practice.</p> <p>¹ Department for Communities and Local Government 2012 National Planning Policy Framework</p>		
Trade Unions and affiliated bodies	0	0	0		No responses were received from trade unions and affiliated bodies.	
Supply chain and service providers	5	0	1		Five supply chain and service providers support our stakeholder-led approach to address concerns around visual amenity.	
Landowners and Estates	1	0	0		One landowner and estates category respondent supports our stakeholder-led approach to address concerns around visual amenity.	

Question 9: Do you support our stakeholder-led approach to address concerns around visual amenity? (Continued)

Stakeholder group	Stakeholder feedback				Free text response	Feedback by stakeholder group	Summary of stakeholder feedback to question 9 and our response
	Yes	No	No response				
Innovation Community	0					One member of the innovation community commented that a cost benefit appraisal of such activities should be undertaken and suggests that "optioneering" should be undertaken when proposals are being developed and that they should be fully shared before an application is made.	
		0					
			2		<p>a) Visual Amenity. This approach is sensible, however the cost benefit for such activities must be considered. [Company name removed] would like to be sure that the budget for such activities is properly socialised and accounted for. Given the necessity for installing renewables in remote locations it is inevitable that there will be visual impact, however the visual impact of invasive species and drought caused by carbon dioxide poisoning of the atmosphere and corresponding climate change run the risk of not being similarly recognised.</p> <p>Undergrounding may be important to some people, but it should not be undertaken at the expense of low carbon generation expansion.</p> <p>In terms of the wider impact of cabling: [company name removed] would draw attention to the specific need to make sure that there is sufficient 'future proofing' to proposals early enough in the system. When new lines are to be proposed [company name removed] would like to be sure that full attention is paid to the options to increase pole specifications above that presently needed in order to provide a simple and less disruptive means of upgrading at a later date. An example in transmission is the stringing of the second circuit on the Downreay line. Had sufficient space not been left then this would have been impossible and expansion held back. [Company name removed] is concerned to make sure similar opportunities to put in sufficient poles and infrastructure is considered in planning.</p> <p>[Company name removed] would further suggest that the 'optioneering' undertaken when proposals are being developed is more fully shared before applications are made. In this way the opportunities to attract other developers to marginal schemes, or generate capacity uplift will be maximised.</p>		

Question 10: Do our proposed expenditure levels and service standards shown in Figure 14 meet your expectations?

Stakeholder group	Stakeholder feedback				Feedback by stakeholder group	Summary of stakeholder feedback to question 10 and our response
	Yes	No	No response	Free text response		
Customer	14				The proposed expenditure levels and service standards met the majority of customers responding to this question's expectations.	Key Theme: The majority of respondents agree our proposed expenditure levels and service standards shown in Figure 14 meet their expectations. Our Response: One stakeholder supported our plans but believed that in addition to our views on undergrounding lines in Areas of Outstanding Natural Beauty we should avoid building wind farms or solar photovoltaic farms in protected landscapes. SSEPD is a network operator and does not install or operate non-standby generation.
		1				
			14			
Connections	1				The proposed expenditure levels and service standards met the connection customers responding to this question's expectations.	
		0				
			2			
Government and Public Sector Organisations	3			a) Spending 1.6%, compared to other needs, is acceptable. However SSE[PD] could do more than just undergrounding power lines in protected landscapes, such as having a policy not to build or use wind turbines or photovoltaic arrays in protected landscapes. b) But what are the 'other' costs is this SSE[PD] profit margins?	The proposed expenditure levels and service standards met the majority of customers responding to this question's expectations. One responded that we should be spending more to protect visual amenity of protected landscapes.	
		0				
			4			
Local Authority	4			a) BUT: Development/research expenditure are correctly linked to micro and macro generation. Wind powered generation will have a short investment shelf life and are going to be very costly and unpredictable. Hydro micro and macro investment is long term (proven fact), reliable and in the long term less costly and can be linked to visual amenity and environmental value.	The proposed expenditure levels and service standards met the expectations of all local authorities responding to this question. However, one respondent caveated this with the need to link this with the life time of the investment.	Another stakeholder expressed the view that our investment in research and development for renewable generation should be matched to the potential asset life and output. Our Orkney active network management scheme has been developed in a manner that accounts for the expected asset life and output of renewable generation assets involved in the scheme. For example, modelling has been undertaken to confirm that the lifecycle financial impact of active management on participating generators is unlikely to affect the financial viability of those generators.
		0				
			4			
Emergency services and NHS bodies	0				No responses were received from emergency services and NHS bodies.	
		0				
			0			
Regulators	0				No regulators responded to this question.	
		0				
			1			
Energy Industry bodies	0				No responses were received from energy industry bodies.	
		0				
			0			
Energy supply companies	1			a) It's not my expectations that count – it's the stakeholders that need to be happy.	The energy supply company who responded to this question agreed that our proposed expenditure levels and service standards met their expectations but added it was our stakeholders who needed to be happy.	
		0				
			0			
Elected Officials	0				No responses were received from elected officials.	Our other core focus innovations for RIIO-ED1, such as thermal energy storage demand-side management and static synchronous compensators (STATCOMs), will facilitate the connection of new distributed generators in a long-term manner well suited to the potential asset life and output of renewable generators. On a more local scale, for example, we are trialling solutions to maximise the proportion of individual distributed generator output that is beneficially consumed or stored on the individual generator's side of the meter, which is also well matched to the potential asset life and output of renewable generators.
		0				
			0			
Utilities	2			a) I should add that the engagement of SSE[PD]'s two regional managers for the south of England has been very beneficial in enhancing its service, which is greatly appreciated by managers within [company name removed].	The proposed expenditure levels and service standards met the two utilities responding to this question's expectations.	
		0				
			2			
Consumer Representatives	0				The consumer representative who responded to this question does not agree that the proposed expenditure levels and service standards will meet their expectations.	
		1		a) Personal. As large users of total heating with total control I was disappointed that the 'low-cost' price increased by more than that of the 'normal' electricity – when it helps cope with wind generators.		
			4			
Trade Unions and affiliated bodies	0				No responses were received from trade unions and affiliated bodies.	
		0				
			0			
Supply chain and service providers	8				The proposed expenditure levels and service standards met the supply chain and service providers responding to this question's expectations.	
		0				
			1			

Question 10: Do our proposed expenditure levels and service standards shown in Figure 14 meet your expectations? (Continued)

Stakeholder group	Stakeholder feedback				Feedback by stakeholder group	Summary of stakeholder feedback to question 10 and our response
	Yes	No	No response	Free text response		
Landowners and Estates	0				No landowners or estates responded to this question.	A stakeholder involved in renewable generation was of the view that our investment plans were not sufficiently focussed on increasing the level of renewable connections. We will address this concern in our Business Plan where we will lay out the substantially increases in expenditure we have justified and indented for during RIIO-ED1 to facilitate the connection of renewables at domestic, commercial and industrial level. This includes proposals to absorb reinforcement costs for existing domestic customers to adopt low carbon technology and ensure all new networks are built fit for a low carbon future. Our proposals on focused early reinforcement for larger renewable projects will also be laid out in our Business Plan together with our discussions with Ofgem on these.
		0				
			1			
Innovation Community	0				The member of the innovation community who responded to this question did not think that the proposed expenditure levels and service standards met their expectations. This is because they indicate that the investment in research and development does is inadequate to secure the fundamental shift in energy production.	
		1		<p>a) As stated above, [company name removed] believes that there are 2 problems:</p> <ol style="list-style-type: none"> 1. That the focus on your safety and reliability of supply in this report is inappropriately skewing the direction you need to take. & 2. The overall level of investment is inadequate to secure the fundamental shift needed in energy production. <p>It is impossible from the document to see how much increasing investment would cost. The plans stated seem to lack the drive and focus that is required to build a sustainable energy supply system and as a result the full picture is obscure. However the present cost of 23p/day/household for the entire distribution process is tiny (Approx £850k/year in Orkney) when compared to the utility received from the electricity network. The total R&D spend planned of around £4M (fig 6) for the entire SSE[PD] network therefore looks extremely weak and [company name removed] would strongly support more muscular plans being put to Ofgem for approval.</p> <p>Given the importance of the grid [company name removed] would support an overall increase in the sum spent on investment to enable renewables and maximise the efficiency of the use of electricity even if this results in an increase in bills.</p>		
			1			

ADDITIONAL COMMENTS

Stakeholder group		Our response
	Free text response	
Customer		
Connections		
Government and Public Sector Organisations		
Local Authority	<p>a) The Council is grateful for the opportunity to respond to this consultation document. SSEPD's Business Plan for 2015-22 is of key importance to Orkney, as a user of energy in all forms, and as a leading edge diversified producer of renewable energy. Fundamental changes in the use, production and storage of electricity are likely to take place over this period, driven by accelerating adoption of low carbon technologies (LCT) and distributed generation. Orkney is at the forefront of these changes, with a high level of awareness amongst Orcadians, and a willingness to embrace these changes. The Council supports SSEPD's commitment to change to meet these challenges, a commitment reflected in the title of the document "Innovating for a Greener, More Efficient Future". Given this title the document itself could perhaps give greater prominence to the issues of LCT and distributed generation, as compared with the issues of Safety and Reliability; these are undoubtedly vital issues but they are of an ongoing operational nature, rather than a basis for fundamental change. This said, the Council appreciates that the supporting documents on Innovation and Connections Policy provide useful supplementary information. [Company name removed] has been working closely with its colleagues in SSEPD on issues associated with delivering effective Grid Infrastructure for Orkney. The development of renewable energy in Orkney has visibly gathered pace over the last years assisted by SSE finding innovative solutions to improve the efficiency of the grid. The Council attaches great importance to the work that it is currently engaged in with SSEPD and Orkney Renewable Energy Forum (OREF) in a tri-partite Steering Group to find solutions to the problem of the current restriction on micro-generation connections in Orkney, which directly addresses the issues of Innovation and Connections Policy. The Council believes that the outcomes of this work will have general applicability, and it would like to see this project formalised and given prominence in SSEPD's Business Plan for 2015-22. The Council's comments on the questions set out in the document are given below. In some cases, given the nature of the comments, it has not been possible to give a simple Yes/No response.</p> <p>Conclusion Overall the Council's view is that the document is well-presented, although it needs to achieve a better balance between ongoing operational issues, particularly Safety and Reliability, and the challenge of moving into the new era of low carbon technologies and distributed generation. The title of the document reflects this challenge but the contents give it less prominence than might be expected.</p> <p>Orcadians are rising to the challenge of a Greener Future, with the rapid adoption of micro-generation technologies by households and businesses, involving a substantial investment of their own funds. The network has not kept pace with this. Developing the network ahead of need is not yet a reality in Orkney, but the commitment by island residents provides a huge opportunity to build a network for the future in the islands, which could be an example to other areas of the potential of LCT and distributed generation. The Council would support this project and it would like to see it included in SSEPD's Business Plan.</p> <p>b) Thank you for consulting the [company name removed] in connection with the consultation detailed above. Having examined the documentation the Board wishes to make comments as detailed in the attached (appendix 2) by way of response. It should be noted that not all elements of the public consultation document have been responded to, only those that are considered to have a direct or indirect impact on the Chilterns Area of Outstanding Natural Beauty or its management, or the [company name removed]. The [company name removed] is a body that represents the interests of all those people that live in and enjoy the Chilterns AONB. It is made up of representatives nominated by the organisations listed in appendix 1. The attached response has been prepared under delegated powers and will be presented for approval to the [company name removed]'s Planning Committee which meets on 9th May 2013. Should you require any further information do not hesitate to contact me. List of Organisations providing nominees to the [company name removed]: Buckinghamshire, Hertfordshire and Oxfordshire County Councils; Central Bedfordshire and Luton Borough Councils (unitary authorities); Aylesbury Vale, Chiltern, North Hertfordshire, South Buckinghamshire, South Oxfordshire, Three Rivers and Wycombe District Councils; Dacorum Borough Council; The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total); and DEFRA (8 in total).</p> <p>Comments: A conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000. Section 87 of the CRoW Act sets out the purposes of a conservation board as: i) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and ii) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty. But if it appears to the board that there is a conflict between those purposes, they are to attach a greater weight to the purpose mention in paragraph (i).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty." Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.</p> <p>The attached response has been prepared by [stakeholder's name removed], under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 9th May 2013. Any further comments made at that meeting will be duly forwarded. Should you require any further information do not hesitate to contact the writer.</p> <p>Response: 1. Thank you for the opportunity to comment on this consultation. The [company name removed] is grateful for the work that SSE is doing to lessen the impacts of its electricity distribution network by seeking to underground overhead power lines in protected landscapes. Incidentally, in England protected landscapes include both AONBs and National Parks and this is not always reflected in the documentation that is being commented on.</p> <p>c) The document supporting this Consultation is very well produced – informative and straight forward to use. *Completing this when power loss in Arran & Kintyre due to adverse weather is to the fore- very aware that the challenge to maintain/restore power supply can be extreme.</p>	<p>These comments were provided during Our Second Consultation. However, they are not specifically related to the points we consulted on. We have included them in the interests of ensuring our process is fully transparent but we will not refer to them in our final business plan. We will follow up on these points through our normal business processes.</p>

ADDITIONAL COMMENTS (Continued)

Stakeholder group	Free text response	Our response
Emergency services and NHS bodies		
Regulators	<p>Thank you for providing the [company name removed] with the opportunity to comment on the above consultation document.</p> <p>I write to advise you that [company name removed] has no further comments beyond those we raised in our response to your first consultation dated 16th November 2012.</p> <p>As a public body committed to openness and transparency, [company name removed] feels it is appropriate that this response be placed on the public record. If you require further clarification on any aspect of this correspondence, please contact [contact removed for anonymity].</p>	
Energy Industry bodies		
Energy supply companies		
Elected Officials		
Utilities	a) I would be pleased to discuss these points in greater detail should you require.	
Consumer Representatives	<p>a) We welcome the opportunity to engage in the development of this strategic document on the future of your electricity distribution network. Our response to the consultation is provided as an annex to this letter. We hope these comments are of use in developing your plans. [Company name removed] and the energy sector The [company name removed] views climate change as the single greatest threat facing people and wildlife and as such we support the widespread deployment of renewables, in line with Scotland's ambitious renewable energy targets, with priority placed first on energy efficiency and demand reduction. However, it is vital that this is done sensitively and sustainably so that developments are delivered in the right places, without damaging Scotland's most important places for wildlife.</p> <p>[Company name removed] is signatory to the 'European Grid Declaration', which recognises the need for investment in renewable energy to combat climate change, and the need to develop Europe's electricity networks to accommodate this expansion 1. It also recognises the equally important need to halt and reverse the loss of biodiversity. It commits the grid operators to follow best practice to avoid and minimise impacts on biodiversity, and to fully implementing EU legislation to protect wildlife and nature sites. Signatories commit to monitor and jointly learn from experiences, e.g. on impacts of new and existing power lines and effectiveness of mitigation measures. The declaration is valued by the signatory grid operators as it demonstrates support for grid expansion among conservation NGOs where this contributes to tackling climate change, and as such it contributes to improving the public acceptability of new infrastructure. While the focus of the declaration is on the transmission network, the same principles apply in developing the UK's distribution network: new power lines 1. http://renewables-grid.eu/activities/european-grid-declaration.html are needed for renewables expansion (and to combat climate change), and these can and must be developed sensitively. We work closely with developers to provide advice on the suitability of development sites before planning or energy consent applications are made. Early engagement allows us to flag up potentially sensitive sites and steer development away from areas of potential risk, and we would hope to be consulted at an early stage in the planning any new infrastructure in order to minimise any potential conflict with the natural environment. This can help the design of developments early on, minimising environmental harm and helping avoid delays in decision making. Please do not hesitate to get in touch if you have any queries.</p> <p>[Contact removed for anonymity]</p> <p>Distribution power lines are a risk to birds for two main reasons: collision and electrocution. Both can be very serious issues, particularly for some species such as white tailed eagles. [Company name removed] are committed to working with grid operators to make sure all necessary steps are taken to avoid and minimise those risks – both for new power lines and existing ones.</p> <p>We welcome SSE's commitment to invest in environmental improvements and suggest that specific environmental projects could include:</p> <ul style="list-style-type: none"> • Undertaking systematic research into priority locations for and the success of installing bird deflectors for power lines and developing an action plan to roll out mitigation measures across the network; • Ecologically sensitive development including removing or undergrounding overhead lines to reduce bird collisions for specific areas at risk; • Strengthened environmental monitoring; and • Environmental enhancement projects in association with power line development. <p>Bird deflectors</p> <p>[Company name removed] welcomes announcements made in December 2012 of plans to introduce bird deflectors in areas where there are wild birds. We also welcome efforts made to engage with regional [company name removed] offices to consult on the location of these devices. We would welcome more information on future plans on this area, and recommend a specific project is undertaken in particular on the collision and electrocution risks and mitigation measures available for white tailed eagles in the East of Scotland. They are of high conservation concern, and are particularly vulnerable to power lines due to their size and behaviour. Even a low number of incidents could have a significant impact on numbers given their low reproductive rate. [Company name removed] would welcome further dialogue with SSE in this area. SSE could use the experiences of this kind of project to develop an action plan to identify power lines that cause high incidence of bird mortalities, and take steps to roll out effective solutions systematically. This would be in line with best practice laid out in the European Grid Declaration.</p> <p>Ecologically sensitive development and environmental enhancement</p> <p>We are also concerned about the environmental implications of any increasing of capacity via new developments and infrastructure. There is a need to ensure that any additional capacity does not result in inappropriate development in sensitive areas. Further information in relation to this issue and how the [company name removed] could engage in this process would be welcomed.</p>	

ADDITIONAL COMMENTS (Continued)

Stakeholder group	Free text response	Our response
Consumer Representatives	<p>We are in favour of a hierarchy of priorities in infrastructure development set out in the European Grid Declaration: 1. build only infrastructure that is needed (fully use opportunities to reduce the need, i.e. energy efficiency); 2. minimise new development (e.g. upgrading, bundling, new technology); 3. mitigate impacts (by first avoiding, then minimizing effects); (Last) compensate for unavoidable impacts. [Company name removed] would welcome opportunities to work constructively with SSE[PD] to support the application of the hierarchy of priorities; for example considering whether undergrounding transmission lines is preferable in some sensitive areas (recognising that underground power lines may not be the best option from an environmental perspective and this must be considered on a case by case basis).</p> <p>We would like to highlight the financial benefits of early engagement with stakeholders to ensure potential conflicts are avoided to avoid progressing projects in unsuitable locations. Early engagement can help to ensure that projects are progressed more quickly, therefore saving costs.</p> <p>More information relating to wider environmental enhancement work undertaken by SSE or mitigation works such as undergrounding of specific sections of overhead line would be of interest to the [company name removed] and its members. Specific enhancement projects could include peatland restoration for climate and biodiversity benefits. There may also be opportunities to create wildlife corridors or habitat 'stepping stones' to enable species to adapt to the changing climate, and to contribute to 'landscape scale' conservation. There is growing experience in this area among grid operators across the EU, for example in Belgium and France.</p> <p>Environmental reporting We would welcome proposals for improved reporting on the environmental performance at the project level. This should include projects at the planning and operational stage and could include further details about enhancement and other work undertaken to protect and enhance biodiversity. Reporting of environmental performance at the network level should incorporate both carbon emissions and impacts on habitats and biodiversity. We would particularly welcome the inclusion of reporting on bird collisions. We encourage SSE to release relevant data underlying network development plans, and where possible will seek to engage as trusted sources of information.</p> <p>b) Thank you for the opportunity to respond to your consultation paper on your plans for the future, and especially with regard to how these could have a significant impact and bearing both on our own activities locally and more widely on other groups and operators like us, during the period of the next price control between 2015-2023. Much of the documentation and the thrust of your individual questions is understandably directed toward your high level themes and general operating priorities, and we generally support the more extensive response by [company name removed] on how these are linked to our region. However, as [company name removed], we wish to respond on a specific matter relating to significant recent developments and challenges faced by those interacting with our local Orkney distribution grid, which is both causing grave concern and has direct bearing on your published wider aspirations relating to "Innovation, and the future of electricity networks" and "Good Service" both in the context of reliability of supply and environmental aspirations. [Company name removed] is a group of member based and geographically defined non profit distributing community groups who have and continue to work together for mutual benefit; most relevantly, centred around the operation of community owned commercial scale wind turbines located in our communities in Orkney, and the distribution and management of independent funds derived from the revenues produced from this activity to achieve local social outcomes, enablement and resilience. Seven of our members have ownership of grid connected wind generators, six of which are, wholly or partly, connected on non-firm ANM connections as part of the RPZ scheme on the Orkney distribution network.</p> <p>Firstly we would like to recognise and praise your foresight and activities under the current price control period which allowed the creation of the RPZ scheme across Orkney and wish to do all that we can to see opportunities like these continue and increase throughout your operating area. The development of single turbine and smaller projects that are typical of our activities, would not have been viable in an area such as Orkney if the network re-enforcement costs needed to provide traditional firm generator connections had been required. The 6+MW of wholly community owned macro-wind generation capacity installed in the last 2 years means Orkney leads the way nationally in this sector and is wholly result of the opportunity that would have been difficult, if not impossible, without the RPZ initiative.</p> <p>However, a substantial blight has developed over the last 12 months which is having severe consequences to our members, wider grid users, and threatens to undermine what otherwise is a phenomenal success story. We can believe that it was not foreseen, but we urge you to address and remedy this as early as possible (certainly with provisions in your network plans in the forthcoming price control period, ideally before 2015) so that the Orkney RPZ can return to being an exemplar for SSEPD, especially as you go forward looking to make it business as usual both here and across your network. We are aware of the wider plans for transmission reinforcement to Orkney, with new 132kv and HVDC connecting cables currently scheduled for 2018 and 2020+ respectively, but request you carry out the necessary work to fix current problems in addition to and ahead of these planned upgrades.</p> <p>As most involved parties are aware, SSEPD made the announcement in October last year to effectively close the Orkney grid to new connections, subject to a review of its current status. It is recognised that this eventuality was, at least partly, required due to the undoubted success of SSEPD being able to respond to the local demand to connect unexpected and unprecedented levels of micro-renewable generation to the grid in the islands, which itself was driven by the opportunity provided by the strength of the recently introduced national Feed in Tariff support scheme combining with our exceptionally high regional wind resources. It is estimated that at least 5MW of sub 50kw microgeneration is currently permitted in the area; representing a collective investment in excess of £20M that this has the potential to return more than £4M per annum directly into the local economy and even play a small part in national energy and carbon reduction targets. This has been generally welcomed by us and its current cessation recognised as a loss of further opportunity.</p> <p>However, with the connection of this volume of small generation over the last 12 months on a non managed firm basis, much higher levels of curtailment than were estimated, and predicted by SSE as part of the contracting of the connection, for the ANM controlled macro-renewable generators has become increasingly apparent, especially on the N Isles sections of the Orkney grid.</p> <p>Due to the inherently varying nature of grids and their electrically interactions, especially when combined with temporary localised factors, we are still building certainty into our estimates. However our community operators already estimate that this winter we are experiencing between 4-8 times more curtailment of production than the SSEPD provided studies on which our business cases were based and terms of our projects' financing secured, with one particular project looking at the loss of approaching 60% of all production through active unexpected curtailment by the ANM system.</p>	
Trade Unions and affiliated bodies		
Supply chain and service providers		
Landowners and Estates		
Innovation Community		

ADDITIONAL COMMENTS (Continued)

Stakeholder group		Our response
	<p>Free text response</p> <p>Conservatively, we predict that this unexpected curtailment is resulting in lost earnings in the order of £5-600K across 4 N Isles based community projects, and more than £1M per annum when combined with similar private generators in that area. This extreme and unexpected level of loss of service is significantly limiting the potential for social investment from our activities, actually currently threatens to make two projects unviable in their own right and, worryingly, still has the potential to be further exacerbated if all the already contracted firm connection capacity on the system is actually utilised as we go forward. We sympathise with SSEPD from the point of view that neither of our predicaments would have been predicted at the outset of the RPZ scheme. Alongside private developers, we have been active and willing partners in this experiment and likewise assessed and accepted the planned costs and limitations that were part of our active network managed non-firm connections estimated, offered and contracted under the scheme. However, the current operation of the network is way outside what was expected when contracting our connections. It is resulting in the failure of SSEPD to deliver a service to us that we could reasonably expect as generation customers, it is apparently also causing considerable quality of supply issues on the demand side of the network, and effectively rendering the grid as currently not fit for purpose for both sets of customers.</p> <p>We have been actively contributing to the joint working with SSEPD and other key partners as part of initiatives such as Fergus Ewing's Steering group on the Orkney Grid issues, but simply find the current situation increasingly unacceptable and untenable without remedial action by the network operator.</p> <p>Reading through the consultation documentation some may be tempted to see this as providing evidence for a request for "investment ahead of need" as mentioned on page 11. However, the affected generators would argue forcibly that both they and SSEPD have already made their investment for what was expected and events since then have resulted in the need for retrospective repair of the system as a result of unplanned failure, before any further investment and development be considered.</p> <p>We all understand fully that the RPZ was a "working experiment" to develop better utilisation of resources, and we accept that, as with every activity of this nature, there are risks involved. However we based business cases and risk assessed our developments on the full range of scenarios that both the grid operator and contracting generators could reasonably have expected at the time of contracting. The current situation is outside of that scale, as a result of unexpected evolution of the local grid after the scheme was designed and ANM parties contracted for connection, but has effectively resulted in the RPZ scheme being broken, by any reasonable definition, for those contracted parties that are significantly affected and needs repair to return it back into expected operating bounds.</p>	
Trade Unions and affiliated bodies		
Supply chain and service providers		
Landowners and Estates		
Innovation Community		