Consultation response – 08/10/2024

Ofgem Regional Energy Strategic Plan policy framework

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Summary and recommendations

Regen welcomes the opportunity to help shape the Regional Energy Strategic Planning policy framework. We have been advocating for a more regional approach to strategic energy planning for several years, including in recent research, insight and thought leadership papers such as:

- Planning the regional energy system to deliver net zero
- Roadmap to RESP: Unlocking regional ambition
- Regional Energy Strategic Planners: Recommendations from the Energy Networks Association Distribution Network Operator group

We broadly support the proposals outlined in the consultation. We believe that RESP activities can introduce a crucial layer of strategic direction to energy system planning, enabling the whole energy system to reflect and enable local, regional and national net zero ambitions. This will be key to delivery of the Clean Power 2030 mission, to the target of 8 GW locally owned and delivered clean energy projects as part of the Local Power Plan, and to the UK's net zero goal.

We have set out recommendations in this consultation response as to how RESPs can most effectively enable a place-based transition to clean energy, based on three overarching points:

1. **RESPs should prioritise bottom-up evidence over top-down disaggregation of national pathways.** They must enable local and regional stakeholders to inform the UK's move to strategic energy planning, creating a feedback loop between national strategic plans and local ambitions. This means ensuring that RESPs respond to local priorities and are based on evidence of how stakeholders are investing in the energy transition at a local level.
2. **NESO should build on and add value to, rather than duplicate, existing processes.** Network processes for forecasting of local and regional load growth and network planning have developed and are now based on extensive engagement activities with customers, local authorities and other stakeholders. The National Energy System Operator (NESO) should build on this work and support shared learnings and consistent standards, assumptions and outputs.

3. **A key function of RESPs should be to ensure that the energy system is net zero-ready.** Electrification of heat and transport (and decommissioning of gas) means equipping the distribution networks to deliver more clean power to consumers. The downsides of early investment are minimal compared to the issues that capacity problems could cause in delaying net zero and impeding local ambitions. In its RESP function, NESO should seek to provide robust insights and data, providing a clear, long-term steer to networks and Ofgem for when and where to invest.

We have developed the following recommendations based on these points and evidence gathered via engagement with key stakeholders through projects and ongoing conversations. More detail is included under relevant questions throughout this document.

- **Recommendation 1:** Ofgem should add a fifth principle supporting a just transition in engagement, decision making, planning and outcomes.
- **Recommendation 2:** Gas and electricity networks should continue with granular, detailed load growth forecasting activities which should be used as primary input into RESPs.
- **Recommendation 3:** Short-term pathways should remain closer to five-year timeframes.
- **Recommendation 4:** The regional vision should cover 10-25 years and be reviewed every three years, per the full RESP refresh.
- **Recommendation 5:** Ofgem should outline how regional planning will be accounted for in network business plans and investment decisions, including a process for 'RESP assurance' on new investments.
- **Recommendation 6:** NESO should monitor and report on progress towards the regional vision and highlight opportunities to further advance this vision with regional stakeholders.
- **Recommendation 7:** Networks should submit data annually, including data captured from extensive local authority engagement, with local authorities and other regional stakeholders submitting more frequently once more dynamic data-sharing processes are in place.
- **Recommendation 8:** NESO should convene a distribution network company (electricity and gas) working group to establish consistent assumptions for network planning and RESP inputs.
- **Recommendation 9:** NESO should provide clarity for longer-term strategic network investment, enabling more strategic planning and supporting the development of net zero supply chains.
- **Recommendation 10:** NESO should make developing consistent assumptions and approaches for network planning a core priority in the first half of 2025.
- **Recommendation 11:** NESO should seek to convene strategic boards in 2025 to develop a high-level regional vision that can inform upcoming network business plans.
- **Recommendation 12:** Ofgem and NESO should set out a cross-vector conflict resolution framework.

- **Recommendation 13:** NESO should provide guidance and standard frameworks for local authorities to provide details of their energy and wider plans as part of the three-year RESP refresh.
- **Recommendation 14:** NESO and networks should establish a ‘touch once’ system that allows local authorities, and other regional stakeholders, to easily submit data to both parties simultaneously.
- **Recommendation 15:** NESO should conduct deep-dive case studies in areas where the credibility of local plans are disputed.
- **Recommendation 16:** NESO should establish a ‘progress register’ of projects not yet seeking grid connections but that may progress in future.
- **Recommendation 17:** NESO should conduct stakeholder mapping and needs assessment to identify where stakeholders need support to participate in regional energy planning.
- **Recommendation 18:** Ensure there is space for citizen and community representation on the strategic board.

About Regen

Regen provides independent, evidence-led insight and advice in support of our mission to transform the UK's energy system for a net zero future. We focus on analysing the systemic challenges of decarbonising power, heat and transport. We know that a transformation of this scale will require engaging the whole of society in a just transition.

Regen is a membership organisation with over 200 members who share our mission, including clean energy developers, businesses, local authorities, community energy groups and research organisations across the energy sector. We manage the Electricity Storage Network (ESN) – the industry group and voice of the grid-scale electricity storage industry in GB.

Responses to questions

Q1. What are your views on the principles to guide NESO's approach to developing the RESP methodology? Please provide your reasoning.

We welcome the principles-based approach to RESP development and agree broadly on the identified principles. However, in engagements with local authorities and other regional stakeholders (e.g. infrastructure providers and community energy groups), we repeatedly heard that the RESP is an opportunity to support a just transition. In addition to better democratising energy planning through the use of strategic boards and engagement, NESO can support this via the RESP function in three main ways:

1. **Engaging with underrepresented groups.** With greater transparency and broad engagement, regional energy strategic planning is an opportunity to reflect the needs of different stakeholders in the energy planning and investment process. This can best be achieved by ensuring representation of, for example, citizen, community and fuel poverty-focused organisations within RESP engagements and on regional working groups.

2. **Enabling less-resourced local authorities to deliver plans and projects.** Some local authorities have more resource and capacity to advance their net zero projects or input into the RESP process than others. To support a just transition, NESO should work with network companies to prioritise place-based support for those less well-equipped to engage with regional planning today, particularly where they have high levels of fuel poverty or social deprivation, for example.

3. **Understanding the distributional impacts of regional energy strategic plans.** Through its whole system planning function, NESO can understand and highlight which areas or groups are likely to benefit from new energy investment and where there may be opportunities to ensure this is done fairly – for example, identifying investment opportunities or challenges in areas of high vulnerability. Regen produced socioeconomic analysis of Scottish and Southern Electricity Networks' 2023 DFES to understand which groups were most impacted or excluded in current network plans and identify opportunities to target investment ahead of need in areas with high levels of vulnerability. NESO can apply this methodology to regional plans to help understand the just transition implications of proposed pathways and work with regional stakeholders to address them.

Recommendation 1: Ofgem should add a fifth principle supporting a just transition in engagement, decision making, planning and outcomes.

Q2. Do you agree that the RESP should include a long-term regional vision alongside a series of short-term and long-term directive net zero pathways? Please provide your reasoning.

Yes. We agree with a long-term vision set by a strategic board, which outlines a region's overall priorities and trajectory at a relatively high level. We also agree with a series of short-term and long-term directive net zero pathways. However, we have four caveats.

More clarity is needed on how pathways and network forecasting and planning will interact.

The consultation document outlines that network data will inform RESP pathways (paragraph 3.6). However, the process set out in paragraph 3.41 of the consultation is unclear regarding how NESO will integrate the evidence from networks on load forecasts into strategic planning.

Networks require a strong understanding of customer needs to ensure that the network is equipped to support them. To this end, networks engage extensively with local and regional stakeholders and track market activity in their load forecasting and planning activities. This is done to a highly granular level (primary and secondary substation) and includes on-the-ground market insights from developers, local authorities and industry to understand real-world decarbonisation trends and connection timelines.

As such, networks are uniquely placed to capture bottom-up details of where customers are likely to connect and the timescales. It is vital that they continue to do this and that NESO uses this information as a priority for regional whole system plans rather than trying to duplicate this process. This can also allow NESO sight of how the market is responding to strategic plans and provide stronger direction or coordination where necessary.

Below is a diagram from our report putting forward recommendations from DNOs on the RESP function. In this approach, gas and electricity networks still hold primary responsibility for load growth forecasting, which feeds into RESP pathways. The RESP outputs (regional vision, multiple pathways) then serve as a key input into load forecasting and network planning activities on an iterative basis.

Recommendation 2: Gas and electricity networks should continue with granular, detailed engagement and load growth forecasting activities which should be used as primary input into RESPs.

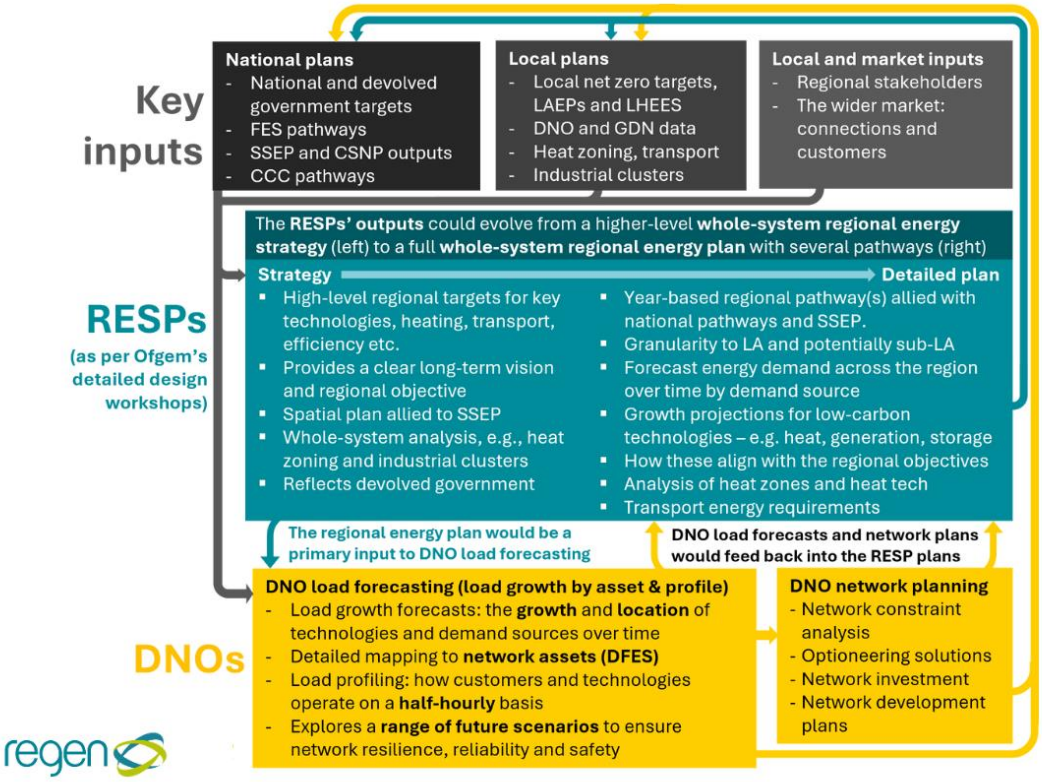

Figure 1. Proposed regional planning and network interactions from the ENA DNO group.

Short-term pathways should be focused on five-year time horizons.

Our experience modelling load growth on the distribution network for Scottish and Southern Electricity Networks (SSEN) and National Grid Electricity Distribution (NGED) shows that short-term distribution growth projections are reasonably reliable, despite changes to project pipelines and policies.

However, there is a significant difference between five-year pathways and ten-year ones. We can be confident in the pipeline of projects to 2030 since most of these are visible in the planning system or connections queue today. By 2034, there is scope for a change of government, policy frameworks, changes in market structures, etc, making a pathway of this length challenging to plan against confidently.

The consultation document suggests that a ten-year horizon may provide stronger investment signals than one of five years. We argue that increasing uncertainty of projections on this timeframe may offset this. Instead, we believe that a five-year short-term pathway, coupled with the longer-term pathway (10-25 years) and the regional vision, can provide equally strong investment signals.

Recommendation 3: Short-term pathways should remain closer to five-year timeframes.

Clarity is needed on when the regional vision will be set and refreshed.

The regional vision set by various regional stakeholders (including elected officials, networks and other strategically relevant organisations) can signal to investors, supply chains and the broader market that a region wishes to pursue a specific set of priorities (for example, industrial hydrogen clusters or more local energy systems). We strongly support this initiative. In the first years of RESP, this should be high-level, outlining regional objectives and opportunities to progress.

The consultation document does not clarify how often this long-term regional vision is expected to be updated or the timeframe it covers. A fast-moving policy, political, and energy landscape must be balanced with a longer-term outlook that supports certainty for investors and supply chains.

During our engagement with a mix of network, local authority, infrastructure, community energy and devolved government stakeholders earlier this year, we heard a preference for a regional vision to cover a longer-term timeframe (e.g. 10 years), reviewed every three to five years.

As such, we suggest that the regional vision is set at the outset of RESP activities, covering a long-term timeframe of 10+ years, and be reviewed formally every three years in line with the full RESP refresh.

Recommendation 4: The regional vision should cover 10-25 years and be reviewed every three years, per the full RESP refresh.

Accountability mechanisms must be developed to mitigate risk and ensure regional stakeholders can progress towards the vision.

Once the regional vision is in place, an accountability mechanism is needed to ensure that regional stakeholders work towards this. It is encouraging that NESO will make clear how the vision and wider place-based engagements have been considered in RESP outputs.

As they will remain ultimately accountable to Ofgem for their business plans, networks should be encouraged to demonstrate how they have incorporated the regional vision in their investment activities.

This serves two purposes: (1) to ensure that networks meaningfully consider the regional vision and RESP pathways in planning and investment and (2) to justify investment decisions to Ofgem based on regional plans that may go above and beyond earlier business plans.

To support this, NESO should provide a 'RESP-assured' function as outlined in our paper Regional Energy Strategic Planners: Recommendations from the ENA Distribution Network Operator group, providing a supporting case to Ofgem for why additional investment is justified in line with regional priorities and democratic input.

Recommendation 5: Ofgem should outline how regional planning will be accounted for in network business plans and investment decisions, including a process for 'RESP assurance' on new investments.

To support wider accountability, NESO must clearly monitor the progress of RESPs, as highlighted in our Roadmap to RESP paper. Specifically, NESO should report on progress towards the regional vision in any annual outputs and convene stakeholders to support and identify opportunities to go further.

Recommendation 6: NESO should monitor and report on progress towards the regional vision and highlight opportunities to further advance this vision with regional stakeholders.

Q3. Do you agree there should be an annual data refresh with a full RESP update every three years? Please provide your reasoning.

Yes. We agree with an annual data refresh and a three-year full RESP update. However, defining which data is expected to be updated annually, and by whom, would be helpful.

Local authority data is not always held in the same format or refreshed on predictable timescales.

Network data, such as load growth projections based on extensive local engagement, modelling and analysis, are already refreshed annually. Therefore, network data is straightforward to include in yearly updates. However, many local authority plans cited in the consultation document as applicable to the RESP (Local Plans, Local Heat and Energy Efficiency Strategies, Local Area Energy Plans) are held in different formats and refreshed at different times.

Many local area energy plans in particular are conducted by external consultants on short-term contracts who deliver a single, static, long-term plan (sometimes in PDF format). This can also make it difficult to source the required data directly, due to contractual or data-sharing restrictions. For this reason, NESO would find it difficult at present to achieve an annual refresh of local authority data. It may also be less effective since such plans typically update on longer timescales.

Networks also already actively source much of this data from local authorities and significant regional stakeholders (e.g. industrial developers) to support load growth forecasting and network planning. For example, NGED and SSEN have for many years included an annual engagement process to identify new housing and commercial developments, delivered by Regen, as a standard part of load forecasting. As a result, some of this local data is likely to be already captured annually as a RESP input via network plans (challenges with integrating local authority and network data are discussed in more depth in our response to Question 7 below).

As such, we suggest that networks submit data annually in the first years of the RESP, including data from local authority engagements, while local authorities should submit data as part of the three-year RESP refresh and input via ongoing engagement. Once better data processes are in place for local authorities, this can then become part of the annual refresh – or a more 'live'

data sharing protocol whereby local authorities can submit data to both RESPs and networks as it becomes available.

Recommendation 7: Networks should submit data annually, including data captured from extensive local authority engagement, with local authorities and other regional stakeholders submitting more frequently once more dynamic data-sharing processes are in place.

Q4. Do you agree the RESP should inform the identification of system needs in the three areas proposed? Please provide your reasoning, referring to each area in turn.

Consistent assumptions

Yes. We support the introduction of consistent assumptions for network planning. However, as noted in the consultation document, assumptions on technology profiles can vary substantially, often with legitimate justification. NESO needs to work in collaboration with the DNOs to understand why certain assumptions are used, and build consensus on the assumptions to be carried forward. This should build on innovation already under way within the ENA to help standardise and promote best practice in network planning.

Many networks already reflect regional variation in their network planning inputs. As such, we argue that the RESP should focus on standardising approaches and assumptions rather than seeking to standardise the inputs into network planning – which, by definition, will vary in different parts of the country.

Recommendation 8:NESO should convene a distribution network company (electricity and gas) working group to establish consistent assumptions for network planning and RESP inputs.

Spatial context for capacity needs

Yes. We support the RESP taking a spatial view of capacity needs, but this should reference and build on existing spatial modelling of future load growth being produced by energy networks. From our experience in delivering highly granular load growth forecasts (down to primary or secondary substation level) for SSEN and NGED, the spatial distribution of future energy demand forecasts is a crucial part of network planning.

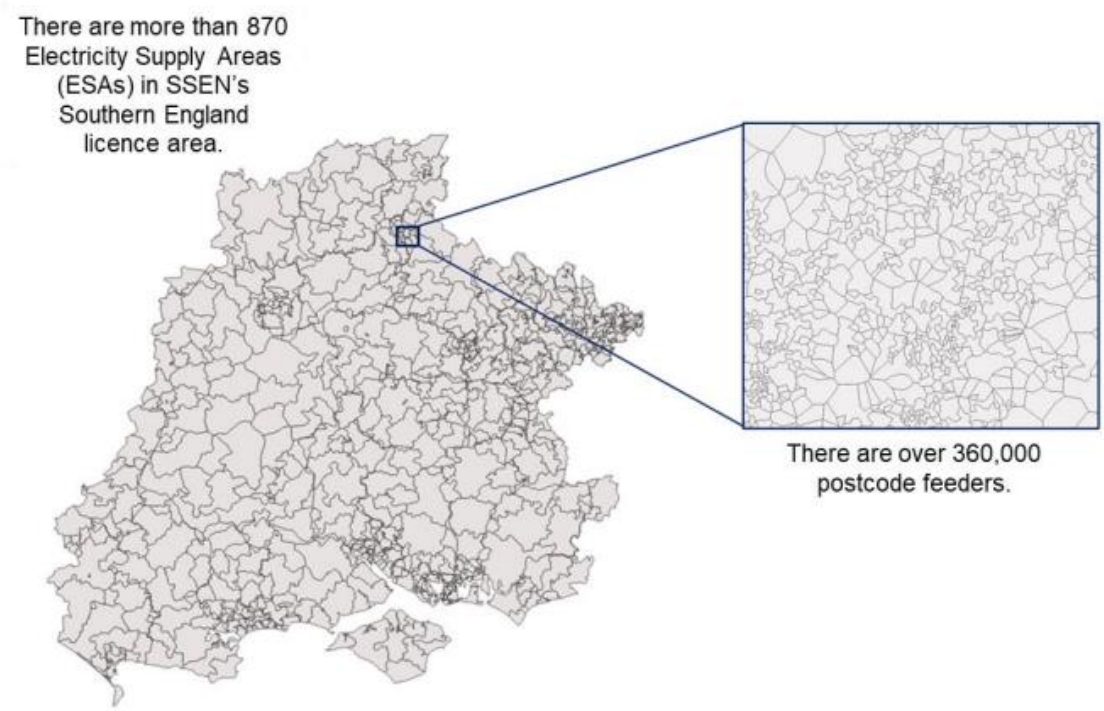

Figure 2. Map of 11 kV and feeder Electricity Supply Areas (ESA) in SSEN's Southern England licence area from the 2023 DFES, produced by Regen.

Ensuring the RESPs provide a spatial view of future capacity requirement also helps deliver the commitment for RESPs to align to the national Strategic Spatial Energy Plan (SSEP).

Ofgem has proposed that views on future capacity requirements should be produced to LSOA level. This is practical for smaller-scale technologies such as EV chargers. However, for grid-scale technologies (like wind farms and grid-scale battery sites), trying to identify future project locations down to LSOA level is unhelpful for network planning. A key consideration must be to ensure that outputs from the RESP can feed into energy network planning, and vice versa.

Informing strategic network investment

Yes. A key role of the RESP is to provide 'RESP-assured' justification for more ambitious anticipatory investment against regional priorities, helping to speed up the net zero transition.

However, there is a clear need for longer-term timeframes on strategic network investment, which RESPs can support. Business plan cycles are relatively short term (5-7 years), making it challenging to establish supply chains for longer-term priorities. This also limits how much investment networks can deliver within this narrow window.

Where feasible, particularly around the regional vision, NESO should seek to provide justification to Ofgem for longer-term strategic network investment as part of the 'RESP-assured' function, enabling them to be more ambitious in their activities.

Recommendation 9: NESO should provide justification for longer-term strategic network investment, enabling more strategic planning and supporting the development of net zero supply chains.

There is an outstanding question of *when* the RESP should inform strategic network investment. The consultation document outlines that the first pathways should be in place in 2026 to help inform RIIO-3 business plans. However, DNOs are already formulating these business plans. The prevailing sense from network engagement is that 2026 is too late to inform business plans directly.

To mitigate this, we suggest that NESO does not rush the first iteration of RESPs, but rather implements other elements over the next 12 months, which can inform RIIO-3 business plans in other ways. Specifically, we suggest that NESO should seek to:

- Work with DNOs and GDNs on consistent approaches and methods to load forecasting as a priority, allowing networks to deliver more consistent plans as an input to the first RESPs.
- Convene strategic boards in the first year to help set the initial high-level regional vision, providing a steer for network business plans before the first RESPs are delivered.

Recommendation 10: NESO should make developing consistent assumptions and approaches for network planning a core priority in the first half of 2025.

Recommendation 11: NESO should seek to convene strategic boards in 2025 to develop a high-level regional vision that can inform upcoming network business plans.

Q5. Do you agree technical coordination should support the resolution of inconsistencies between RESPs and network company plans? Please provide your reasoning.

Yes. We agree that technical coordination should support the resolution of inconsistencies between RESPs and network company plans. However, sector-specific RIIO-3 methodologies for gas and electricity are not always aligned – either with each other or with the delivery of net zero. This makes developing a cohesive cross-vector pathway that delivers net zero difficult.

As such, Ofgem must outline precisely how it plans to reconcile cross-vector conflicts and any disagreement between network companies and RESP plans. It also needs to clarify how Ofgem will ensure network companies participate in and adhere to the RESP process and outputs and implement them in their subsequent planning activities.

Recommendation 12: Ofgem and NESO should outline a clear cross-vector conflict resolution framework.

Q7. Do you agree with the framework of standard data inputs for the RESP? Please provide your reasoning.

Yes. We agree with the proposed list of standard data inputs and with the principle that they must be regionally flexible. We also believe that 'bottom-up' data – informed by real-world information and for which processes such as load growth forecasting and local planning already exist – should be a primary input, allowing RESPs to account for national data, but ultimately reflecting and encouraging regional progress.

This must be balanced with ensuring that the data submission process, particularly for local authorities, is not needlessly onerous. Local plans must also be better integrated with network and regional planning, which is currently difficult. To that end, we have two further points to highlight.

Networks are already innovating to better integrate local authority data consistently into network planning.

Local authorities already submit much of the data outlined to networks as part of the network planning. However, this can be challenging to incorporate due to the different formats in which different local authority plans are kept and the varying levels of detail they contain.

Work is under way to better embed this local authority data in network planning, such as through the Regional Energy System Optimisation Planning (RESOP) innovation project. NESO should engage with innovation into better integrating local authority and network plans. It can also support this process once the RESP function is in flight by providing guidance and data frameworks to help adapt and standardise wider local authority inputs such as Local Plans and decarbonisation strategies, ensuring these are 'RESP ready'.

This need not prescribe a specific methodology for local spatial planning, as outlined in paragraph 3.51 (which we agree with), but should aim to enable consistent data outputs that can be easily integrated into regional plans.

Recommendation 13: NESO should provide guidance and standard frameworks for local authorities to provide details of their energy and wider plans as part of the three-year RESP refresh.

A 'touch once' system is needed to enable local authorities to easily submit data to both networks and NESO simultaneously.

Because local authorities already submit data to the networks which will be useful to the RESP, there is a risk of duplication or creating unnecessary additional processes. As such, local authority stakeholders told us they would like to see a 'touch once' system where local authorities can simultaneously submit data to both networks and the RESP. Digital tools could aid this, as highlighted in Chapter 4 of the consultation.

Projects such as Planning Regional Infrastructure in a Digital Environment (PRIDE) explore how local authorities can use digital tools to share 'live' local area energy plans directly with networks and regional bodies. SSEN's LENZA tool uses a similar digital platform to enable local authorities to conduct energy planning and share data with networks in an interoperable format. NESO should seek lessons from this project and develop a 'touch once' process for local energy data. At this point, it may be feasible for NESO to gather local authority data annually, or even to share access to live project data in some areas.

Recommendation 14: NESO and networks should establish a 'touch once' system that allows local authorities, and other regional stakeholders, to easily submit data to both parties simultaneously.

Q8. Do you have any suggestions for criteria to assess the credibility of inputs to the RESP?

Understanding the credibility of different plans is paramount to ensuring that RESPs reflect regional progress and can provide certainty to investors, supply chains and project developers, especially in the short term. Several criteria could help assess the credibility of different plans or projects. For example:

- Does the plan provide detailed delivery timelines or pathways?
- Does the plan include funding and resource allocation?
- Is the plan statutory or mandated by central government?
- For local authority projects, what stage of approval has the plan reached?
- Does the plan include a set of proposed or in-flight projects?
- Have any plan elements already achieved planning permission, grid connections, etc?

Beyond credibility, deep-dive investment studies are needed to help better assess the credibility of specific projects.

Networks have grappled with the question of credibility within the load growth forecasting and network planning process. This is an evolving process. Due to network planning processes considering a wide and diverse range of energy generation, storage and demand technology sectors, the amalgamation of load growth across these sectors can create layers of uncertainty. The process Regen pioneered and continues to develop with NGED and SSEN has based future load growth projections on evidence, localised characteristics, credible targets/ambition and sector expertise and insights.

As part of the network innovation project RESOP (Regional Energy System Optimisation Planning), Regen worked with Advanced Infrastructure (which developed the LENZA platform) to extract data around energy projects, energy targets/pathways and energy development spatial zones for (e.g.) heat, transport and renewable energy sectors, collated and submitted by

local authority representatives for specific geographical areas. This data is fed into existing scenario forecasting processes.

This evolving methodology builds on a legacy of existing direct engagement and data collection from local and regional representatives to inform network DFES analysis. Local evidence and data points that have been directly reflected in load forecasting includes:

- Locationally specific data around new housing and new non-domestic developments
- Local authority strategies, plans and targets around low-carbon heat, transport, renewable energy, hydrogen and waste collection
- Local authority planning application data for yet-to-be-built energy projects
- Local area energy plans (LAEPs) and local heat and energy efficiency strategies (LHEES).

Stakeholders may also potentially dispute NESO's credibility assessment if they think a project or plan is more likely to progress than NESO has given credit for. For example, in Solihull, local stakeholders felt that the DNO had failed to account for an industrial cluster development in their network plans which meant that the investment in the network needed for the cluster to establish was unlikely to be delivered. In response, the West Midlands Combined Authority commissioned a deep-dive case study into the area with the DNO. Through extensive additional engagement, the study found that the cluster had progressed well beyond what network plan inputs had suggested. Based on this justification, the plans were subsequently revised.

Where credibility assessments are disputed, NESO should provide guidance to networks on conducting deep-dive investment studies to uncover any information that may have been missed about a regionally significant project. This can enable projects to progress and simultaneously provide justification for network investment. This should include dedicated engagement with project partners or those involved in designing and delivering the plans.

Recommendation 15: NESO should conduct deep-dive case studies in areas where the credibility of local plans are disputed.

Creating a 'progress register' can help track in-development projects and plans while allowing for greater confidence in short-term pathways.

A key challenge of this process is not just assessing the credibility of plans or projects. There is also the question of what happens to information deemed not to merit inclusion in regional pathways.

There is a risk that these 'non-credible' plans or projects will drop off the radar entirely until they have sufficiently progressed against credibility criteria. This means there is limited visibility of plans or projects in earlier stages of development that are yet progressing. Ongoing visibility of these earlier-stage projects can support more anticipatory infrastructure investment and provide additional insight into emerging opportunities for a regional strategic board to pursue.

To capture this information, we propose that each network establishes a 'progress register' where plans, particularly projects that do not meet current credibility criteria, can be logged

and monitored. This allows short-term pathways to reflect the most credible plans or project inputs while keeping track of 'less credible' ones that may progress.

As networks are already working to better understand credibility of different plans and projects, NESO should seek to learn from innovation in this space (such as SSEN RESOP) and collate this data across networks.

Recommendation 16: NESO should establish a 'progress register' of projects not yet seeking grid connections but that may progress in future.

Figure 3 shows how these two functions fit together. In this case, networks first assess the credibility of projects or plans to include in load forecasting and network planning. Where stakeholders feel specific projects or plans have not been accounted for, or projects are in early stages but progressing significantly, networks can conduct a deep-dive investment study. Should a project meet criteria to justify investment, these are then progressed to network plans and subsequently the RESP. Projects which do not meet the criteria are tracked in the progress register by networks, which is also submitted to NESO for regional-level tracking and opportunity identification.

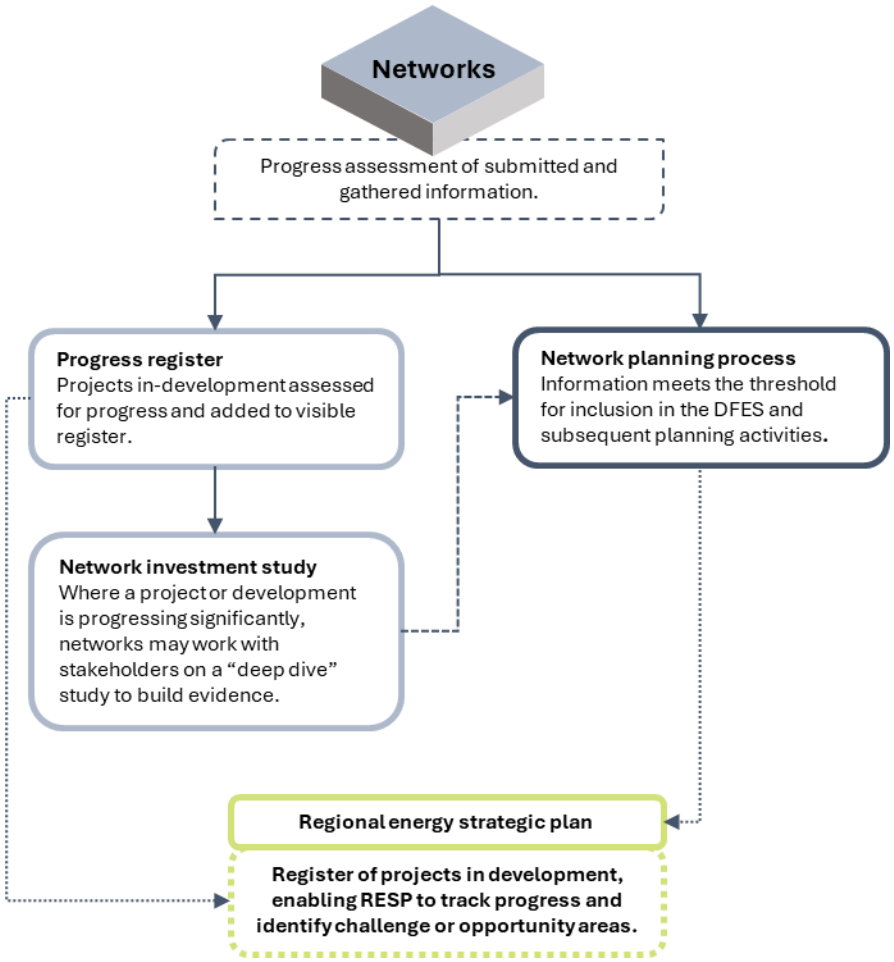

Figure 33. Proposed process for assessing and capturing in-development information.

Q9. Do you agree with the framework for local actor support? Please provide your reasoning.

Yes. We agree with the framework of local actor support. We especially welcome the proposed training for stakeholders to participate in working groups and the strategic board, which we heard strongly in our Roadmap to RESP workshop with regional stakeholders. This can enable (e.g.) fuel poverty charities and other social-focused organisations to have a say in the strategic direction of regional planning. It will also be critical to ensure elected representatives can engage in what are likely to be quite complex technical discussions.

Paragraph 3.63 outlines that NESO will build on existing relationships in its place-based engagement. This is positive. Given that local authorities and networks in particular hold many relevant relationships with industry, infrastructure, business, civic and community stakeholders, it may be useful for NESO first to conduct a regional stakeholder mapping exercise. This can allow NESO to understand which relationships exist and more rigorously and consistently identify which stakeholders may require more proactive or additional support. The UK government's Engagement Good Practice Team already sets out key steps and justification for stakeholder mapping, which could be applied here. The region should inform this through extensive early engagement.

Recommendation 17: NESO should conduct stakeholder mapping and needs assessment to identify where stakeholders need support to participate in regional energy planning.

Q10. Do you agree with the purpose of the Strategic Board? Please provide your reasoning.

Yes. We agree that the Strategic Board should focus on setting regional priorities, steering the direction of regional ambition, and providing a clear forum for democratic input. We also agree that it is inappropriate for a Strategic Board to deliver conflict resolution, which should be a NESO function as the RESP Delivery Body (with Strategic Board input at relevant times).

We agree that NESO should clearly explain how it has accounted for the Strategic Board's influence on the RESP output. This transparency is critical to maintaining trust among stakeholders involved in the process and upholding democratic legitimacy.

Q11. Do you agree that the strategic board should include representation from relevant democratic actors, network companies and wider cross-sector actors in each region?

Yes. As set out in our Roadmap to RESP paper, it is critical that the strategic board not be solely elected officials and networks, but include representation from significant actors in the region – particularly those working at the nexus of energy and society, such as fuel poverty charities, trade unions or community energy. Without NESO establishing a direct citizen representation or governance function (e.g. a Citizen's Assembly) this is integral to ensuring that those working with citizens and communities can directly inform RESP activities. Elected officials will provide democratic input from a broad perspective but do not represent citizens' experience of the energy system quite so directly.

We appreciate the need to keep the strategic board lean and to allow for different stakeholders to be represented in different regions. However, ensuring that there is space for 'citizen and community representative' groups to reflect the citizen voice is vital. More dedicated community or fuel poverty-focused working groups can help inform more in-depth work on these themes.

As per the response to Question 10, this would require proactive training to ensure more expert representatives from network companies do not overwhelm non-expert participants.

Recommendation 18: Ensure there is space for citizen and community representation on the strategic board.