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Date: 16th June 2023
Our Reference: IEMD/SK/160623/ofgem



**WOKINGHAM
BOROUGH COUNCIL**

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Dear Ofgem,

RESPONSE OF WOKINGHAM BOROUGH COUNCIL TO OFGEM'S OPEN LETTER OF 16TH MAY 2023 REGARDING FUTURE REFORM TO THE ELECTRICITY CONNECTIONS PROCESS

As Executive Member for Climate Emergency and Resident Services, I write from and on behalf of Wokingham Borough Council in response to your open letter of 16th May.

In the first instance we would like to thank you for allowing the opportunity to review your proposals for reform and to make comment. In particular, and from experience, we share the concerns regarding the ability of the existing connections process to deliver upon the Government's aspirations to decarbonise the grid by 2035. We strongly agree that reform is required to 'unblock' the delivery of shovel-ready schemes and commend your commitment to working with the industry to take the actions identified as necessary to ensure that the situation improves rapidly and significantly.

In the second instance therefore we would like to offer support to the proposals and to any further measures that may be identified through the consultation that will actively improve the connections process for all stakeholders.

To set context for our submissions, Wokingham Borough Council is a Unitary Authority located in the east of Berkshire. We declared a climate emergency in July 2019 which commits us to playing as full a role as possible in reducing our carbon footprint to be net carbon zero by 2030. Our Climate Emergency Action Plan sets out the planned steps on our journey towards achieving this goal, including increasing generation of renewable energy through investing in solar farms.

To this effect we have committed significant resource to securing planning permission for a 29MWP solar farm, securing vacant possession, appointing a contractor, and had been working in good faith against a DNO connection offer to deliver the facility in advance of 2026. We have also initiated feasibility work on two more council owned sites that we believe are capable of accommodating large scale solar farm installations. This represents a significant commitment from the Council and these projects could help play a significant role in the ambitions set out in the Government's 'Powering Up Britain' manifesto; namely to quintuple solar power and to have fully decarbonised the power system by 2035.

It was therefore with incredible frustration that in April we received a variation offer from the DNO specifying a new connection date of 2037; due to upgrades now required at the transmission level before the project could connect to the grid.



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As you will appreciate, Wokingham Borough Council has already spent significant money on this project in good faith. The Council has also made certain assumptions around revenue generation, which during a time of austerity has helped inform key decisions around budgeting for key council services over the coming years. Unless reform is enacted to the current connection process to unblock the delivery of shovel-ready solar farms such as ours, then not only will Wokingham and central Government fail to deliver against their respective climate emergency action plans, but council services will also be negatively impacted.

As a public organisation, we are accountable to our residents and auditors and are required to provide sound and transparent reasoning for our decision making around budget spend. Without a degree of confidence in the connection process, as will only come about with reforms as you outline, then Wokingham (and other local authorities) will not be able to make sound decisions on the funding and delivery of these important solar projects. In such circumstances the projects will simply fall away, as assets and budgets will need to be reappropriated to other uses/services which offer our residents better value.

Your identification of the specific issues and of demonstrable steps in addressing those issues are therefore particularly welcomed; especially with regard to queue management, storage and coordination. We also note and are encouraged by your comments that through the ESO's 5-point plan it is expected that the majority of existing projects will see improvements in connection dates of between 2-10 years. We do however read with some concern that new offers may not be received until March 2024. Whilst we absolutely support the reform and appreciate the need for due process, we would urge for swifter resolution and therefore earlier certainty around connection dates and delivery. We would also emphasise that there is notable difference between those projects that were given a long connection date from the outset, and those, like us, who had been formally offered an earlier connection date and had progressed accordingly, only to subsequently have that date pushed back. Projects like ours, that have already entered into contract on the basis of previously/formally agreed connection dates, carry significantly more risk and therefore should be prioritised in getting earlier certainty on revised (earlier) connection dates. We suspect Wokingham will not be the only stakeholder in this position.

As a local authority we are keen to work with the industry as proactively as possible to facilitate the delivery of our solar farm projects. To this effect we have already established positive relationships with the DNO and ESO, but we are nevertheless cognisant that reforms to the connection process are required if we are to achieve a positive resolution. We are keen therefore to support the short and medium term reforms you outline.

In terms of the longer term outlook, we agree with the need for easily accessible, standardised data and information so that generators can understand what size of generator triggers the requirement for reinforcement at a specific location. We also support the concept of Regional System Planners (RSPs) and would like to be kept abreast of developments and consulted accordingly on the governance and scope. As 'place makers' local government is key in infrastructure planning, and we would request a multi-level approach whereby RSPs operate balancing top down and bottom up priorities. We would very much expect local government to have a voice that the RSPs can feed into the Centralised Strategic Network Plan (CSNP) so that the CSNP can be locally informed.

Further to this, if local government is to play a meaningful role in the CSNP, then the local government sector will need to be equipped with the statutory powers and resource to enable this. Having read the letter, there appears little content regarding the crucial role local government will be required to make and it is hoped this will be elaborated upon in the further policy development referred to.

We would also like to suggest that as part of the medium and longer term reforms being proposed and the development of LAEPs, there needs to be a mechanism to ensure private companies don't simply come in and 'cherry pick' the easier generation project opportunities at the detriment of public and community owned schemes that then struggle to acquire the necessary funding. We would further

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request that any solutions ensure that community owned generators are afforded equitable opportunity to connect, particularly around pricing structures that may otherwise act as a barrier to delivery.

I trust the above suitably summarises Wokingham's position. With this in mind please do not hesitate to contact me if you feel there is anything specifically that you think Wokingham Borough Council can contribute to your work and to supporting the reforms.

Yours sincerely,

Sarah Kerr
Executive Member for Climate Change and Resident Services

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