

Written evidence submitted by the Future Oxfordshire Partnership

Accelerated decarbonisation should be of the highest priority, with the impacts of climate change already resulting in significant social, ecological, and economic costs at both a local and global scale. The Future Oxfordshire Partnership (FOP) welcomes the opportunity to respond to the EAC call for evidence re enabling the sustainable electrification of the UK economy.

The Future Oxfordshire Partnership is a joint committee of the six councils of Oxfordshire (Oxfordshire County Council, Oxford City Council, Cherwell District Council, South Oxfordshire District Council, Vale of White Horse District Council, and West Oxfordshire District Council) together with key strategic partners including OxLEP. We are submitting this response on behalf of our constituent partners, following extensive consultation with relevant officers in each organisation.

What challenges does connecting more renewable electricity to the grid pose, both for those businesses and households who wish to connect to it, and for grid operators?

To what extent do the following act as barriers to the UK's targets to decarbonise the power supply? How well is the Government addressing these barriers, and what else can be done to address them? What, if any, targets should be set in these areas?

- **grid connection delays and bottlenecks, onshore and offshore**
 - **lack of, or delays to developing, necessary infrastructure**
 - **insufficient scale or capacity**
 - **supply chain and skills constraints, and**
 - **access to finance**
- Grid constraints and connectivity challenges hinder economic growth, nationally significant Research and Development (R&D), and commercialisation opportunities within the county, and slow the pace of activity to deliver collective net zero ambitions.
 - A lack of forward investment in infrastructure in both the transmission and distribution network has resulted in substantial grid constraints for new supply connections, and a backlog of renewable energy projects looking to join the grid. Connecting more renewable electricity to the grid can be incredibly costly, often with significant time delays, and there is also the issue of curtailed export, all of which impact the ability to bring forward renewable energy projects to support local and national net zero ambitions. Examples include:
 - Grid connections are preventing and delaying investment in the scaling up of renewables. For example, Oxfordshire County Council had been exploring options for siting ground mounted solar on a closed landfill site, but the project was ultimately unviable due to the associated connection costs that could not be met by the council. Similarly, a decarbonisation feasibility study completed for Berinsfield Garden Village revealed the key obstacle would be a delay in connecting to the grid – the date given by the Distribution Network Operators (DNOs) was 2028.
 - HMG grant funding opportunities for the delivery of decarbonisation projects, such as the Public Sector Decarbonisation Scheme, are being missed as decarbonisation works are not able to be completed within grant deadlines due to significant lead times given by DNOs for delivery of supporting infrastructure works, coupled with short delivery timelines associated with the grant itself.

- [The Springfield Meadows Project](#), which is one of many projects under [Project Local Energy Oxfordshire \(LEO\)](#), is a climate positive development of 25 homes in Oxfordshire built by Greencore Construction. The houses are built to Passivhaus energy standards and are better than zero-carbon. The development produces an unusually large amount of solar PV energy: however, the business-as-usual planned infrastructure from DNOs was insufficient and thus curtailed export from this development, such that the total amount of generation is not made use of, limiting contribution to zero carbon electricity generation; we understand this to be typical for solar schemes where grid infrastructure is constrained. One solution to handle the increased exportation from solar PV would be to install more infrastructure, i.e., add another transformer, but this would mean more costs to bill payers, more embedded carbon, and it would not be a smart solution to be replicated for low carbon developments elsewhere.
- Housing developments in Oxfordshire are experiencing prohibitively costly grid connection offers and delays, with timeframes creating serious issues for development rollout. For example, Bicester growth (7000 houses+) is paused whilst we await grid connection reinforcement. Where developers are engaging with the DNO directly to offer possible solutions to connectivity issues, legislation and anti-competition rules (regulated by Ofgem) are often cited as reasons for these solutions not to be considered.
- Commercial sites too are experiencing costly and delayed connections owing to grid constraints. Oxfordshire is home to two Enterprise Zones - Science Vale and the Didcot Growth Accelerator - both of which are being affected by constraints in rollout of additional power supply infrastructure to new developments. Lead in times of 24-months are regularly being given for non-contestable works to be carried out, which has led to significant project completion delays across the sites. As the Oxfordshire Local Enterprise Partnership is permitted to reinvest 100% of business rates generated on these sites back into local infrastructure development, we are seeing a significant impact on available funding for local place-shaping agendas. North West Bicester is another example of a commercial site with inhibited growth as a result of grid connection challenges.
- Whilst we cannot comment upon DNO resourcing with certainty, we understand through our partnership working that DNOs are overwhelmed with the volume of grid connection applications received, which brings into question whether they are sufficiently resourced to support increased integration of renewables into the system.
- Grid reinforcement at a distribution level appears very reactive in nature, despite the introduction of distribution future energy scenarios (DFES), pioneered by Regen since 2015. We believe the levels of investment within RIIO ED2 determinations are insufficient to meet net zero ambitions. Modernisation and future proofing of the grid to limit connection barriers has been largely stripped out of Distribution Network Operator (DNO) 2023-2028 business plans for the sake of negligible cost savings. The benefits to householder bills indicated as a result of this level of disinvestment by Ofgem appear trivial, amounting to an estimated £10/year. We are of the understanding that key policy decisions like these require a formal impact assessment, but no long-term cost impact assessment appears to have been completed for this important decision.

The proposal to use RIIO uncertainty mechanisms for core DNO costs, which were targeted at supporting grid modernisation, suggests an immediate lack of commitment by Ofgem within RIIO ED2 determinations to anticipatory investment

which enables the transition to net zero. Such proposal also appears to lack clarity or transparency around proposed costings, and will surely be a more resource intensive mechanism, with multiple applications needing to be reviewed throughout the price control period, which is likely to only add to time delays. It is our estimation that the level of cost savings will be minimal, whilst the longer-term impacts will have a greater cost, especially to those on lower incomes.

With grid capacity already significantly constrained and economic growth inhibited, the determinations within RIIO ED2 based on the 'System Transformation' pathway, together with the cuts made to the strategic investment in the baseline funding, will not enable the DNOs to support the vital transition to Distribution System Operators (DSO) across the region, nor will it facilitate the transition to net zero at the pace and scale to support local and national targets. A failure to start building the network needed for the future now risks a delayed, disorderly, unjust and counter-productive transition. If the next round of plans is not due to be produced until 2028, have we not missed an opportunity re: modernisation of the grid to support our collective net zero ambitions? Without improved forward thinking and proactive network investment to enable grid upgrades, we will not be able to sustainably electrify the UK, and transition to net zero.

The RIIO ED2 determinations appear to largely confirm that there is minimal investment in grid infrastructure ahead of connection requests/agreements, despite projections through Future Energy Scenario planning. We are very concerned that it will not be possible to decarbonise the electricity grid in the timescales stated i.e., 2035. Future regulatory price control determinations must proactively enable anticipatory investment, informed by robust local data and insight, to support the transition to net zero.

- The connection queuing system operates on a first-come, first-served basis; this does not incentivise development of and investment in new renewable energy projects, who can anticipate lengthy connection delays with multiple other projects further up the queue. This indicates the need to consider how renewable energy connections and/or those supporting decarbonisation efforts could be prioritised to support our net zero ambitions.
- We are also deeply concerned by the unknown scale of 'zombie projects' within the system, locking up capacity unnecessarily, and preventing renewable schemes which are ready to go from coming online. We would argue that there should be a national directive calling for the review of projects which have been within the system over a specified period of time, to identify and remove them as appropriate and prevent unnecessary and costly infrastructure upgrades. We welcome the recent reforms (2nd June 2023) introduced by National Grid Electricity System Operator (ESO), which aim to accelerate connections to the grid whereby energy generators who are not progressing their project to connect to the transmission system will be required to leave the queue or move backwards; whilst this marks a positive step forward in the transmission component of the system, it does not address challenges in the distribution element.

Whilst it is understood that the transition from DNO to DSO (and anticipatory investment) should support in preventing so many zombie project applications in the first instance, as referenced above we believe that the RIIO ED2 determinations prevent an effective transition to DSO, and significantly limit anticipatory investment.

- Whilst the question posed is centred on the challenges in connecting more renewables to the grid, the FOP would like to consider what benefits 100% renewable energy generation may bring. With the price of electricity in part governed by the price of gas, which at present is incredibly high, would the intention in the future be to divorce electricity prices from gas prices, if generation is 100% renewable?

What contribution do, or should, localised mini grids make to achieving the Government's targets of (a) decarbonising the UK power system by 2035 and (b) becoming a net zero economy by 2050? What role ought there to be for decentralised energy distribution points and distributed energy generation in the future of electricity supply?

What developments, including technological developments, and incentives are required in the areas of:

- **storage**
 - **transmission and distribution**
 - **demand management and flexibility**
 - **interconnection with neighbouring grids**
- Significant energy loss during transmission, coupled with the increasing ability for local renewable energy generation, highlights the key role of decentralised energy generation and distribution, including the development of mini grids, in supporting net zero ambitions.
 - One solution for managing the increased demand for electricity as we transition to net zero would be to rely on large generators to provide more energy. However, such reliance would require costly upgrades to both the transmission and distribution networks, which can take many years to deliver. Local Energy Oxfordshire (LEO) sought to understand how decentralised local energy solutions, where energy is balanced (supply meets demand) at the grid edge closest to consumers, as opposed to in the transmission network, could accelerate the transition to a zero-carbon energy system, in pursuit of net zero ambitions. The project ran a series of trials across Oxfordshire to investigate how new technologies and flexibility services could balance energy in the local network. Delivery of local energy solutions such as those trialled through Project LEO could support in reducing the scale of costly, significant network upgrades – please refer to the [Project LEO website](#) for trial examples.
 - Project LEO was able to demonstrate that energy flexibility is key in reducing the extent of costly network upgrades by reducing peak demand and maximising local use of renewable generation. Improved flexibility on the low voltage network is limited by technical, commercial, social and regulatory challenges. A range of policy and regulatory changes combined with investment in data and digital capabilities are needed to unlock the full potential of energy flexibility, outlined in [Project LEO's Final Report](#).
 - Project LEO has shown how optimisation can occur behind the secondary substation with the use of successful monitoring and optimised buildings that can take part in Smart Community Energy Schemes. As well as delivering efficient energy allocation and viable business models, such local optimisation has wider community benefits - for example, creating Smart and Fair Neighbourhoods with engaged local participants (work led by project partner, Low Carbon Hub).
 - Project LEO has also demonstrated that strategic investment in the network can deliver significant benefits for the energy network and local communities and that this

investment is essential to meet net zero timelines. However, it needs to be justified on the basis of robust data, mapping and planning processes. We need therefore to invest in data and digital for networks, especially on the low voltage network at the grid edge, surfacing data that is visible and understandable to those interested in the local area, beyond the Distribution System Operator environment. This would enable more efficient and smarter operation of the electricity network through flexible services.

- Project LEO found that aggregators are essential for plugging the specialist expertise gap to enable non-specialist flex providers to participate in flexibility markets, meaning that aggregators, in the widest sense, are essential for enabling Smart and Fair Neighbourhoods, flex at the grid edge, and organising many Distributed Energy Resources. If local authorities, public sector estates, and other small scale flex providers are to participate in flex markets, there is a clear need for a third party – an aggregator – to provide a service to support this.
- Continued development of, and investment in, sustainable battery technologies will be key to making locally generated energy available when it is required, supporting to balance supply and demand locally.
- We understand the grid to work on a principle of ‘worst case scenario’ in relation to renewable energy, such that sites powered by onsite green energy still need to be able draw their electricity from the grid should local renewable generation fail. Greater research and investment into smart technologies such as grid limiters, export limiters, time of use switches etc., is thus needed to support the transition to 100% renewable generation.
- There is often limited ability within local authority for extensive innovation owing to associated financial risk.
- Project LEO highlighted that whilst innovation funding is improving, it must adapt to help deliver decarbonisation ambitions. It concluded that future funding for major systems’ change needs to allow and encourage cross sectoral investment, and the application of capital and revenue R&D investment to accelerate real world innovation at scale that delivers a benchmark for rapid change to deliver net zero ambitions.

How will the design of the future grid incorporate adaptation measures so as to minimise the potential impacts on the electricity system from extreme weather events, such as Storm Arwen in November 2021?

- Any grid development and/or reinforcement activity must factor in an understanding of the impacts of varying temperature increases, so to ensure appropriate adaptation measures can be made in support of a resilient energy system.

Is Ofgem fit for purpose as a regulator to deliver the increase in electricity supply and grid connection needed? Should Ofgem have a net zero remit?

- As referenced previously, we are concerned that RIIO ED2 determinations demonstrate a lack of commitment to forward investment to ultimately support grid decarbonisation and net zero ambitions. We would welcome the opportunity to better understand evidence and considerations during the completion of impact assessments, which are key to supporting and ensuring effective governance.

- Ofgem should have a net zero remit. Given the UK target for a net zero electricity grid by 2035, it would be very strange if the body responsible for regulating those organisations implementing this ambition on the ground were not to have a net zero remit. One would hope that linking Ofgem's responsibilities to this target would help with the authorisation of funding and investment for projects which support national decarbonisation goals.

Is the five-year business plan cycle appropriate to achieve the overarching objectives of delivering a net zero grid by 2035 and a net zero economy by 2050? How does the pricing review process need to evolve to achieve the UK's strategic objectives on decarbonisation?

- It is unrealistic to assume that reinforcement decisions for both the transmission and distribution network made at the beginning of a five-year cycle will capture the connectivity needs of local places five years on, given the fast paced and rapidly evolving nature of society, and the drive to decarbonise. Concerns referenced earlier re lack of investment in support of grid modernisation in the distribution network (determinations for the RIIO ED2 (2023-2028)), are such that if five-year business plan cycles remain, there are only two additional opportunities to enable significant investment in the grid to support net zero ambitions. We would recommend that the business plan cycles need to be reviewed to allow improved agility, and the flexibility to respond within the five-year period of a business plan to emerging needs, which are aligned to and support decarbonisation goals. Improved agility within DNO business plans will be supported by improved two-way communication, capturing plans for roll out of local decarbonisation projects.
- There is an additional challenge in that local plans which identify sites where development is likely to take place within a local area - and thus help to inform future growth and demand scenarios - typically operate within longer time frames e.g., 15-20 years, such that there is a lack of alignment between local planning and grid reinforcement/modernisation planning. To enable improved integration of energy reinforcement planning with local plans, should DNO business plans not be developed in such a way which enables the inclusion of improved foresight, the evidence for which is in part captured through DFES?
- The current business plan model appears to lack both the foresight necessary to meet net zero ambitions in the longer term and the ability to act on key reinforcement/modernisation activity which emerges during a five year business plan cycle. We can only expect to see accelerated roll out of Low Carbon Technology (LCT) if the challenges presented by the five year planning cycle are robustly addressed.

What barriers are there in the planning process? Do the proposed changes to the National Policy Statements on energy infrastructure address these adequately? Can the grid development required be undertaken wholly under the nationally significant infrastructure project planning arrangements in the Planning Act 2008?

- The local plan process is at risk of being completed in isolation from the grid connection process, with DNOs not currently statutory consultees on local plans or large planning applications. Without aligned planning cycles grid constraints are such that we risk unsound local plans and uncontrolled growth outside of plan.
- Local planning teams currently have no ability to refuse to grant planning permission on the grounds of a lack of renewables provision, or where developers do not evidence that the required power provision exists. Should consideration not be given to a national

mandate from central government which stipulates a minimum amount of local renewable energy generation for developments alongside smart technologies, and in line with local area energy planning? Should there not be a system in place for planning applicants to evidence that connectivity will be available for the proposed development?

- Requests for input into DFES are typically submitted to Local Planning Authorities. However, in two-tier systems of local government this will exclude county councils, whose remit includes strategic infrastructure planning, transport and highways, and waste management. As such, DFES typically fail to include a significant body of evidence which would inform necessary reinforcement to the grid (e.g., on expected uptake of electric vehicles and associated roll out of supporting infrastructure in locations across the county). Within Oxfordshire we have specifically requested that the County Council be a recipient of the annual call for input into DFES, but would recommend that this be a national requirement. Furthermore, input into DFES is not statutory for local authorities. We would suggest that mandated completion, along with sufficient training and support from Regen and the DNOs to enable effective local authority input, would support improved modelling of generation, storage, and demand.
- We recognise the role of Nationally Significant Infrastructure Projects (NSIPs) in the development of the grid, but we would be concerned if all development was via NSIPs that failed to recognise the importance of decentralised energy solutions.
- Local authorities are consultees on NSIPs, and are not involved in the identification of sites. We would suggest it beneficial to involve local authorities in the initial identification of sites for the development of NSIPs owing to the knowledge that councils possess of their local area and its assets, in the context of multifunctional land-use. Involving local authorities in the site allocation process should support improved relations with local resident communities for whom the NSIP impacts. Resource must be made available to local authorities to support site suitability analysis.
- We understand NSIPs to take a significantly long time to progress with infrastructure applications taking between 3-5 years to be approved; this begs the question that if all grid development were to be delivered through NSIPs, how would we feasibly be able to decarbonise on time?
- The National Planning Policy Framework has undergone some revisions, but it needs reviewing from the perspective of enabling sustainable electrification of the UK economy, with particular reference to weighing up carbon reduction against other concerns (like housing, heritage, viability, food production etc.). At present national planning policy can be unclear on what our priorities should be when planning for climate change, and how the topic of carbon reduction/energy generation should be weighed up against other important priorities in plan making and decision making; national planning policy needs updating to support in guiding on the weighting of these considerations. At present there is significant responsibility on the shoulders of local authorities to keep pace with delivery that enables national (and local) decarbonisation targets to be reached, whilst often leaving too much uncertainty in how this can be achieved within the current resourcing.
- Critical to success in addressing climate change and driving more sustainable energy systems is ensuring that planning officers preparing policies and determining applications (and arguably local authority officers more generally) are well resourced and trained to meet the climate challenge. Local authorities are under consistent time and financial pressure. In a fast-moving and challenging area, more resource needs to be made available to ensure that officers are well equipped in terms of knowledge, skill, and confidence to manage decarbonisation ambitions.

- Some parts of EV and green energy infrastructure are currently very complex to obtain planning permission for – for example, cable channels for EVs which run across highways require multiple separate planning applications.
- Local plans deal with new developments which are a small percentage of existing housing and commercial stock; a large part of carbon reduction needs to be achieved through retrofitting existing properties. The planning system has limited control and influence over retrofitting. Local area energy planning should support roll out of retrofit through effective and joined up planning with DNOs.
- We are concerned that there is a risk of a lack of integrated planning between national infrastructure bodies. If changes are to be made for the electricity grid, an argument could be made for the gas grid. Is there not duplication with both the gas grid and electricity grids forecasting the wholesale respective electrification and gasification (via hydrogen) of transport and heating?

Is land availability a constraint? If so, how can the constraint best be addressed?

How can communities be encouraged to accept the infrastructure required to increase capacity? What compensation, if any, might be required?

- Land constraints vary between urban and rural areas across Oxfordshire. There are competing land-use demands e.g., housebuilding, infrastructure, food production, energy generation and storage, and biodiversity net gain etc., but no nationally agreed and mandated framework to support weighing up of these considerations against one another, to ensure the most effective multi-functional land-use.
- Greater consideration at a national level needs to be given to encouraging and incentivising landowners to support renewable energy schemes.
- Expansion of roof-top solar and other renewables on existing sites needs significant focus, but this is impacted by local grid constraints and business rates. We understand that prospective commercial developers may be reluctant to place solar PV on their large properties in the event it takes significant time to bring in a tenant, during which they would be liable for business rates.
- Green energy production (solar, wind etc) and infrastructure should be sited in areas where it does not spoil the landscape for local communities, and diminish the ability to grow food - as referenced previously local authorities may be best placed to support site suitability analysis. The siting of this infrastructure is currently severely impacted by the location of constrained and available grid connections, so that desirable sites for large scale renewables from a landscape point of view are often unviable due to grid constraints.
- We understand the Centre for Sustainability is investigating whether it is possible to pre-emptively consult communities on locations that would be acceptable and unacceptable for green energy infrastructure, to ensure that community receptiveness to infrastructure is a factor when making plans to site that infrastructure. Ensuring that the community is brought along on the planning process and is meaningfully engaged, rather than having the process 'done to them', will be critical to success.

- As we understand it, through the NSIP process, developers are not currently obliged to provide community benefit from major infrastructure projects, apart from the indirect benefits of the money the landowner makes from the scheme. An obligation to provide such benefits would likely make this infrastructure more palatable to the community. Financial incentives, subsidies, tax breaks, and lower tariffs/local flex tariffs may also help to improve community receptiveness to green energy infrastructure projects.

What potential is there for community energy schemes to contribute to sustainable electrification? How can they be encouraged to develop?

- Project LEO demonstrated significant potential for Smart Community Energy Schemes – more information is available on [the Project LEO website](#).
- Within the Vale of White Horse, there is a community led solar and wind farm – the key to success here was a willing local landowner, a local community that were keen to engage, and a considerable amount of time volunteered by the community to raise the necessary funds. For this kind of approach to be more widely adopted, incentives may need to be offered by central government for micro-investments in local solar schemes, and possibly incentives for landowners.
- Community energy schemes can be encouraged through offering financial incentives, and unblocking key obstacles, which include the cost of grid connections, suitable land availability, and interest and capacity of community to volunteer a significant amount of their own time to making the project work. Connection delays to the grid make it very difficult for local authorities to motivate local communities to develop green energy schemes when they are told they'll have to wait five years for a connection.
- Whilst smart local energy projects are feasible, and individual households and buildings can go 'behind the meter', Oxfordshire's Project LEO demonstrated some of the challenges in this process. One option for behind the meter is 'grid islanding', and whilst there are working examples of these setups, the cost of infrastructure for this kind of project is currently high, and there are security issues with supply which sometimes drops out. Developers currently view 'grid islanding' as risky when it comes to selling the houses. Greater research into 'behind the meter' technologies and viability studies are required.
- There are feasibility studies taking place around community owned heat networks across the county, in a similar fashion to Swaffham Prior in Cambridgeshire. These projects offer a large scale investment into off gas properties and electrification of heating which could aid smart technologies; the view is that they have a lot of unreached potential, and need specific targeted support given that 20-30% of Oxfordshire is made up of off-gas properties.

What role are local authorities playing in delivering the Government's targets to decarbonise the grid by 2035? Should net zero energy plans be mandated at a local level?

Is there enough resource available—across the Electricity System Operator, regulatory bodies, Government, and network companies—to deliver policy, regulatory and industry workstreams at the pace necessary to achieve Government targets? If not, what additional resource is required?

- Local authorities have a key role to play in grid decarbonisation with the development of local area energy planning approaches. Please note, net zero energy plans are interpreted within this response to be local area energy plans.
- The [Oxfordshire net zero Route Map and Action Plan](#) and Project LEO have both highlighted the critical need for a collaborative local area energy planning approach to be developed in Oxfordshire, in order to ensure net zero ambitions can be realised. The LEO LAEP+ mapping tool developed through Project LEO provides key data and insight to inform local area energy planning. Insights from the various LEO trials offer ideas for innovative decentralised local energy solutions. Oxfordshire has since started to explore what a local area planning approach could look like for the county, to support net zero ambitions.
- We understand few areas in the UK are advanced in the process of establishing local area energy plans, owing to a lack of skills, funding, and mandate. Whilst we support the development of a local area energy planning approach in enabling the transition to net zero, adequate resource must be provided to facilitate their development and implementation in the longer term. Project LEO demonstrated how resource intensive robust and effective local area energy planning can be.
- Roles, responsibilities, and legal status for local area energy plan development and delivery should be clarified – guidance is needed from central government to determine the scale and mechanism to engage actors across the energy system to deliver a coordinated and strategic approach to local area energy planning.
- Local government also needs robust guidance and the appropriate level of mandate from central government to encourage businesses to reduce their emissions.
- A lack of adequate and accessible training to address the skills gap must be addressed if local area energy plans are to be mandated. Project LEO highlighted the need for the introduction of a body that can enable the development of flexible and scalable local area energy planning and associated toolkits in regional geographies where the local authority with democratic accountability, can properly interface with the energy system and network geographies. That body could enable delivery by providing advice, insight and supporting timely decision making to support local area energy planning.
- Project LEO has demonstrated that to enable successful local area energy planning and delivery of decarbonisation projects, investment in data and digital capability is critical.
- If local area energy plans were to be mandated, it would need to be clear what status they would have, and how they feed into and integrate with local planning - for example, how they interrelate with Infrastructure Delivery Plans (IDP) (recognising that many projects in IDPs are larger than the scope of council implemented projects) and refer to infrastructure projects of other partners.
- The FOP understands that local area energy plans should enable anticipatory investment within future price control determinations, to support grid modernisation which accelerates the transition to net zero. In order for local area energy planning to secure wider buy in and commitment nationally, and amongst a wider group of stakeholders, we would request that Ofgem provides written confirmation that local area energy plans provide sufficient evidence to inform anticipatory investment in the grid.

- Local authorities are experts in their local area, and skilled at developing policies based on its need. Any change in local energy system governance should therefore be implemented in a way that accommodates and supports local authority targets, policies and investment plans, to achieve optimal outcomes at the most affordable costs.
- A key question, the answer for which remains unclarified, is that if local area energy plans were to be mandated, who would the mandate apply to, and who would be the assigned lead – local authorities? If this is the case, then responsibility must be given to other key stakeholders to support their development and effective implementation.
- Local authorities can design and embed policies to support local and national net zero ambitions – however, if the network is unable to support these, this prevents the local authority's ability to deliver upon decarbonisation targets.

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