



**Friends of
the Earth
Scotland**

Hannah Nixon
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Westminster
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By email: Project.TransmiT@ofgem.gov.uk

19th November 2010

Dear Ms Nixon

Please accept our apologies for the late delivery of this submission to your call for evidence. We trust that you will still be able to take it into account.

Friends of the Earth Scotland is pleased that this review is being undertaken, and broadly supports its scope.

Our overriding concern is that the review should result in a transmission charging system which fairly recognizes the fundamental differences between sustainable renewable forms of generation whose location is determined, or at least heavily influenced by the location of the resource (notably wind, wave and tidal); and forms of generation reliant on widely traded commodities, and thus whose least environmentally damaging location is significantly determined by their proximity to markets (gas, coal, nuclear).

We therefore strongly urge that full consideration be given to hybrid charging systems which retain substantial distance-based elements for the latter sources, but reduce or eliminate them for the former.

In addition Friends of the Earth Scotland urges that the review should encompass detailed consideration of the scope (in the context of aspirations to fully decarbonise electricity generation before 2030) for charging mechanisms to facilitate:

- Appropriate investments in connection, especially for offshore and island located renewables, so that suitable scale connections are installed to release potential, rather than subsequently requiring incremental increases as additional projects come on line.
- Appropriate investments in 'interconnection' between the Scottish and English systems, and between the UK and Europe to facilitate sustainable exploitation of Scotland's renewable potential, and appropriate opportunities for shared system

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back up as foreseen by the ECF Roadmap 2050. I attach research undertaken for Friends of the Earth Scotland by GL Garrad Hassan, which includes new assessments of the renewables potential and interconnection requirements in Scotland up to 2030.

- Appropriate deployment of additional electricity storage and peaking plant; and demand side management including deferrable demand technologies.

Friends of the Earth Scotland stands ready to contribute further to the review as required.

Yours sincerely



Duncan McLaren
Chief Executive