Summary for EEH Strategic Leadership Board

This consultation provides EEH with an opportunity to comment on OFGEM's approach to the development of Regional Energy Strategic Plans (RESP) as part of the emerging structure of the newly nationalised National Energy System Operator (NESO).

Currently, there is no single body responsible for overseeing the strategic planning and design of the country's electricity and gas networks. NESO will fill this gap – breaking down the siloes which exist between the planning of electricity and gas systems, with independent oversight for the design of all Great Britain's energy networks.

Each region (proposed to largely match the STB geographies) will be tasked with developing a RESP which will inform future energy infrastructure planning and deployment. This consultation looks the proposed structure, roles, responsibilities and design of the RESP and the planning associated with that.

EEH are well positioned to provide a robust and comprehensive response to this consultation – reflecting our approach to governance, stakeholder management and our experiences with the successes and challenges associated with launching and maintaining a successful Strategic Regional Body.

The principles for the development of the RESP methodology, particularly regarding governance and data, align well with EEH's approach to developing a strategic, long-term regional vision and the necessity for clear, consistent pathways.

Key governance considerations highlight the importance of including both short-term and long-term pathways in the RESP to ensure that actions align with overarching regional and national net-zero goals. This approach is positive and should prevent conflicts between short-term decisions and long-term objectives, ensuring coherence and flexibility in response to emerging technologies and policy changes.

From a governance perspective, the inclusion of various stakeholders, especially combined and local authorities, network companies, STBs and wider cross sector actors is critical for ensuring that decisions reflect local and regional priorities.

However, EEH have some concerns about democratic accountability due to the lack of veto power for the Strategic Board, which could weaken the influence of democratic actors and regional input in decision-making. This undermines the potential for the RESP to fully represent the interests of all regions and stakeholders. There is a need to revisit the role and decision-making authority of the Board to ensure that it can effectively represent regional interests and maintain public trust.

On data, the proposed framework for standard data inputs is robust, ensuring alignment with national and regional goals while incorporating diverse sources. Our experience highlights that ensuring data consistency, accuracy, and integration across sectors remains a challenge. The RESP framework should include mechanisms for data verification and flexibility to accommodate region-specific needs without losing benefits associated with standardisation. This will support informed decision-making and better coordination across different regional and national bodies.

Q1. What are your views on the principles (in paragraph 2.8) to guide NESO's approach to developing the RESP methodology? Please provide your reasoning.

- Including a long-term regional vision alongside a series of short-term and long-term directive net-zero pathways in a RESP sets out a sensible approach.

- A long-term regional vision provides a comprehensive framework that aligns all stakeholders (government, businesses, and communities) to common goals. It ensures that short term actions are consistent with the desired long-term outcomes, reducing the risk of contrary efforts.

- As a regional body EEH recognise that the long-term vision of any strategy acts as a guide, helping to shape short-term and medium-term actions in a way that supports future goals. This approach is crucial for ensuring that the aims/delivery of short-term targets do not undermine long-term objectives.

- By incorporating both short-term and long-term delivery pathways, the RESP can be adapted to new technologies, economic changes, and policy developments. A clear long-term vision helps to engage and secure the buy-in of a diverse range of stakeholders. It provides a shared understanding of the end point – what success looks like - which can align efforts across different sectors and communities.

- Long-term planning helps identify risks and challenges that might arise over time, e.g. changes in demand, technology /uptake and policy shifts. By planning for the long term, the RESP can include strategies to mitigate such risks

- The integration of a long-term vision ensures that the RESP not only focuses on achieving net-zero emissions but also fosters broader sustainability and resilience in the region. This includes considerations like economic diversification, social equity, and environmental changes / challenges.

- M&E is critical – and makes it easier to measure progress, adjust strategies as needed. Having both short-term and long-term pathways allows for the establishment of clear benchmarks and milestones.

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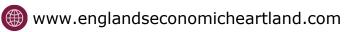
Q2. Do you agree that the RESP should include a long-term regional vision, alongside a series of short-term and long-term directive net zero pathways? Please provide your reasoning.

Yes: RESP should include a long-term regional vision alongside a series of short-term and long-term directive net-zero pathways.

Strategic alignment
- A long-term regional vision sets a clear, overarching goal that all stakeholders can work towards. this approach has been leveraged to good effect by EEH and the wider STBs / PRPs.
- A long-term vision ensures that short-term actions are not just reactive but are (strategically) aligned with the long-term objectives. It reduces the risk of short-term initiatives conflicting with future goals.

Consistency and coherence

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- By integrating both short-term and long-term pathways, the RESP can ensure consistency in decision-making and policy development. This is essential for maintaining a strong direction of travel toward net-zero targets and avoiding fragmented approaches that could slow progress.

Adaptability and flexibility
- The inclusion of short-term and long-term pathways allows the RESP to be adaptable. It can accommodate new technology, shifts in policy, and changes in economic (macro/micro) while still being focused on the long-term vision. T

Engagement
- A long-term vision can inspire and motivate stakeholders, from policymakers to the public, by providing a clear picture of the desired future. When combined with actionable short-term steps, it helps to maintain engagement and build momentum, ensuring that progress is visible and measurable. Policy and investment 'certainty' are critical for investment and planning at a local level.

Risk management
- Long-term planning allows for better identification and management of potential risks, such as economic disruptions, technological changes, or environmental impacts. By having a clear vision and pathway, the RESP can include contingency plans and strategies to address these risks, ensuring resilience.

Resource optimisation
- With a long-term vision, resources can be allocated more efficiently, ensuring that investments in infrastructure, technology, and effort are aligned with both immediate needs and future goals.

Sustainability and equity
- A long-term vision that is integrated with directive pathways helps to ensure that sustainability and social equity are central to the RESP. It allows for a balanced approach that considers environmental, economic, and social dimensions, leading to more comprehensive and inclusive outcomes.

Monitoring and accountability
- Clear short-term and long-term pathways, aligned with a regional vision, provide benchmarks for monitoring progress. This structure enhances accountability, as it allows for regular assessment of whether the region (RESP) is on track to meet its goals, and if necessary, adjustments can be made.
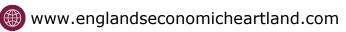
The approach set out ensures that the plan is both visionary and actionable, capable of guiding the region effectively toward a sustainable and equitable future.

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

Yes, an annual data refresh with a full RESP update every three years is a sound approach.

This mirrors the approach of EEH to our regional evidence base: whilst some data developed at the national level is on longer refresh cycles – partners place high value on current data where available.

- Annual refreshes keep the plan linked the most recent data, enabling informed decision-making and adjustments.

- Regular updates help track progress, identify trends, and make corrections to stay on track.
- This approach allows the RESP to adapt to emerging challenges and opportunities without becoming outdated.
- Frequent data updates maintain transparency and keep stakeholders informed and engaged.
- A full update every three years provides an opportunity to assess and refine the plan based on broader changes in the energy landscape.

This would ensure the RESP remains relevant, actionable, and aligned with both short-term and long-term objectives.

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

The RESP should inform the identification of system needs in the three areas proposed.

For each area:

Consistent assumptions:
- Developing a set of common assumptions across all regions is crucial for ensuring consistency in how low carbon technologies are integrated into the energy system.
- Mandating this approach form inception is sensible: STB have struggled with consistency regarding data collection and the development of tools and benchmarking.
- Consistency helps in creating reliable and comparable projections - vital for coordinated regional planning and for translating growth projections into network impacts effectively.

Spatial context:
- Including a spatial view of demand and generation growth projections helps visualise where network constraints may emerge and where additional capacity is needed. This is important for localized planning, ensuring that the unique characteristics and needs of each region are considered, thereby optimising network investments. Many existing regional actors across the vectors may be able to support this and already leverage a geospatial approach – consistency will be important.
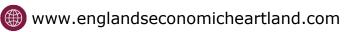
Strategic network investment:
- Identifying locations for strategic (needs definition) investments is essential for aligning short-term actions with the long-term regional vision. This directive role in pinpointing where investments should be made ensures that infrastructure development is proactive, supporting the broader goals of decarbonisation and system resilience.

This approach ensures that the RESP is both comprehensive and adapted to the specific needs of each region.

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

N/A (would seem sensible)

Q6. What are your views on the three building blocks which come together to form the RESP in line with our vision? Are there any key components missing?

The three building blocks proposed for the RESP - modelling supply and demand, identifying system need, and technical coordination are robust. they form a strong foundation but there are a number of considerations and potential gaps that could be addressed.

Modelling supply and demand:
- Strengths: This provides a data-driven foundation for understanding future energy needs. The inclusion of a long-term regional vision with both short-term and long-term net-zero pathways is particularly valuable, as it allows for flexibility and adaptability in planning.
- Concerns: Reliance on a single short-term pathway could be overly simplistic, given the uncertainties inherent in demand forecasts. This approach may not fully capture the variability across different regions, potentially leading to poor short-term decisions. Further consideration of applying place typology may be useful. While the focus on net-zero is Key, other regional priorities, such as connectivity, economic development, and social/societal policy areas might not be adequately considered if they are not explicitly integrated into the modelling process.

Identifying system need:
- Strengths: Providing consistent assumptions and a spatial context for capacity needs is a sound approach. It helps ensure that network planning is coherent across regions and aligns with broader strategic development and planning goals. The directive role in identifying strategic investments is also important for ensuring that the necessary infrastructure is developed proactively.
- Concerns: A potential gap is the lack of emphasis on local stakeholder agency in identifying/setting system needs. While the framework provides a technical basis for planning, it may not fully account for the nuances of local priorities, which could lead to resistance or a lack of political engagement if local needs are not adequately addressed/recognised.

Technical coordination:
- Strengths: Technical coordination is essential for ensuring that the RESP is not just a theoretical plan but one that can be practically implemented. By resolving inconsistencies between the RESP and network company plans, this building block helps ensure that all elements of the energy system work together effectively.
- Concerns: The scope of technical coordination, as outlined, seems a little limited. It focuses primarily on resolving inconsistencies rather than enabling innovation or exploring alternative approaches that could enhance the overall effectiveness of the plan. Separately - the practical implementation of technical coordination, particularly in regions with multiple network operators (like EEH) is not fully addressed, which could lead to challenges in achieving cohesive outcomes.

Additional areas of focus:

Resilience planning:
- The current framework does not explicitly address how the RESP will incorporate resilience planning, particularly in response to climate change or other disruptions. Given the increasing frequency of extreme weather events and other risks, resilience should be a more prominent component of the plan.

Economic and social equity:

- While the RESP focuses on achieving net-zero targets, there is limited focus on ensuring that the transition is economically/socially equitable. Without clear strategies to address potential disparities in energy access and affordability, the plan could inadvertently exacerbate existing inequalities: Rural communities with lower density of demand can be particularly vulnerable to this phenomenon.

Integration with other regional plans:
- The interaction between the RESP and other regional plans (e.g., housing, transport) is not fully explored. A more integrated approach would ensure that energy planning is not siloed but instead supports broader regional development goals. Governance and hierarchy challenges should not be underestimated – and will need careful consideration sensitivities at a local level.

Innovation and futureproofing:
- Could benefit from a stronger emphasis on innovation and futureproofing. This includes exploring emerging technologies, particularly AI/ML in planning and alternative/additional demand segmentation that could play a critical role in achieving net-zero while also addressing regional specificities.

The three building blocks—modelling supply and demand, identifying system need, and technical coordination provide a solid foundation for the RESP. However, it would benefit from the inclusion of additional components particularly resilience, equity, integration with other regional plans.

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

We generally agree with the framework of standard data inputs, but with some caveats.

Comprehensive data collection:

- The proposed framework includes a broad range of data inputs from national, regional, and local sources, they will be crucial for developing a holistic and accurate energy strategy.
- By incorporating these sources particularly medium/long term transport and housing strategies, the RESP can create a comprehensive view of the energy demand landscape.
- It will be challenging to ensure that all data sources are consistently reliable and up to date. Variations in data quality will be a challenge - particularly from local sources.
- This could impact the accuracy of the RESP. There needs to be a robust mechanism for verifying and standardising the data across different regions to mitigate this risk – whilst ensuring poor data quality/missing data does not exclude regions (or sub regions) considerations when developing the RESP

Alignment with national and regional goals:

- The framework ensures that the RESP aligns with national and regional goals, such as net-zero targets and climate change policies. This alignment is essential for creating a coherent strategy that supports both local needs and broader policy objectives.
- However, the focus on aligning with national goals might sometimes negate specific local priorities. While national policies are critical, the RESP should be flexible enough to accommodate local contexts and needs, even if they diverge

slightly from national objectives. Ensuring that local data inputs are given appropriate consideration in the decision-making process is crucial.

Inclusion of cross-sectoral data:

- The inclusion of cross-sectoral data, such as transport, housing, and telecommunications strategies, is a strong point of the framework. This approach acknowledges the economy wide nature of energy planning and ensures that the RESP considers the broader socio-economic context. EEH has robust geospatial forecasting of EV/LEV uptake -this should not be overlooked.
- The challenge with cross-sectoral data is ensuring that it is integrated effectively. Different sectors will have different data collection methodologies, timelines, and levels of granularity, which could lead to inconsistencies. The RESP framework should include guidelines for harmonising these diverse data sources to ensure they contribute meaningfully to the plan.

Data transparency and accessibility:

- Transparency in approach data collection and usage is good. Making data accessible to all stakeholders allows for more participation in the planning process – there will undoubtably be opportunities arising from this approach.
- While transparency is important, the framework will also need consider data privacy and security, particularly when dealing with usage patterns or infrastructure vulnerabilities – though aggregation/ "traffic light" indicators may negate risk – see approach to MND.

Standardisation and consistency:

- The framework's goal of standardising data inputs across regions is vital for ensuring consistency in the RESP. This standardisation allows for better comparability and aggregation of data, leading to more reliable planning outcomes.
- However, strict standardisation could potentially stifle local innovation or lead to the exclusion of valuable data that does not fit neatly into the standardised framework. The RESP should allow for some flexibility in how data is collected and used, ensuring that unique local insights are not lost in the process of standardisation.

The framework of standard data inputs for the RESP is well-conceived - however, to maximise its effectiveness, the framework should include robust mechanisms for data verification, flexibility to accommodate local needs, guidelines for integrating cross-sectoral data.

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

Our comments are standard suggestions: OFGEM and by extension the NESO will be very well versed in data management.

Data Accuracy and Reliability:
- Verification: Ensure that data inputs come from reputable and verified source.
- Cross-check inputs against historical data to verify consistency
Transparency and Methodology:
- Clear Documentation: Inputs should be accompanied by clear documentation that outlines the methodology used to gather and process the data, including any assumptions, limitations, and uncertainties.

- Replicability: The methodology should be transparent enough that other stakeholders could reproduce the data or analysis independently,

Timeliness and Relevance:
- Ensure that data inputs are current
- Inputs should be directly relevant to the specific regional context and the goals of the RESP. As previously noted, data that is too generalised or not region-specific may not accurately reflect local conditions and needs.

Granularity and Specificity:
- Inputs should be granular enough to capture local variations and specificities. For instance, energy demand forecasts should consider regional economic ambition
- Geographic data should have a resolution that is fine enough to be useful in regional planning.

Scenario Testing:
- Inputs should be tested across multiple scenarios to ensure they hold up under different future conditions, e.g. varying economic growth rates or technological adoption patterns.

Alignment with National and Regional Policies:
- Ensure that inputs are aligned with/take consideration of existing regional policies, such as transport focused net-zero targets or specific energy transition strategies. Where relevant, compare inputs with data from similar regions or projects to ensure they are within a reasonable range and not outliers.

Flexibility for Updates:
- Criteria should include the ability to easily update inputs as new data becomes available or as conditions change. Inputs should not be static

Inputs should incorporate insights from local stakeholders who have on-the-ground knowledge of the region's energy (demand) landscape. This can help validate the relevance and accuracy of the data.

Q9. Do you agree with the framework for local actor support? Please provide your reasoning.
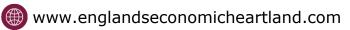
Yes: Providing technical advice, training, and access to digital tools is crucial for empowering local actors, especially those with limited experience in energy planning.

Supporting coherent and coordinated planning:

- By supporting local actors in aligning their plans with the broader regional and national energy strategies, the framework helps create a more coherent and integrated approach to energy planning. This reduces the risk of fragmented or conflicting initiatives and ensures that local plans contribute effectively to the overall goals of the RESP.
- The framework's emphasis on coordination through working groups and other forums is positive - but will rely on the participants having demonstrable agency on setting the direction of the RESP

Promoting best practices and knowledge sharing:

- The establishment of a 'bank' of energy planning best practices is a valuable resource for local actors. It allows them to learn from successful initiatives in other regions, speeding up the adoption of effective strategies and avoiding common pitfalls.
- Providing access to common digital tools and improving data consistency across regions is crucial for creating a reliable foundation for planning. Consistent data allows for better comparisons, more accurate projections, and more informed decision-making.

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Adaptability to regional needs:

- The framework's proposed adaptability ensures that the level and type of support provided can be tailored to the specific needs of each region. This recognises that different regions may have varying levels of expertise, resources, and specific challenges.
- By allowing NESO to provide additional steers on local planning potential, such as opportunities for heat pumps or energy efficiency, the framework remains responsive to the unique characteristics of each region.
- Defined Scope: The framework maintains/provides clarity about the role of the RESP and NESO, ensuring that their focus remains on strategic planning and coordination rather than on direct (local)project implementation or funding.

The framework is strong in regard to fostering initial engagement and capacity building.

There needs to be a focus on ensuring that local actors can maintain and build upon this support in the long term. Continuous engagement and support mechanisms might be necessary to prevent momentum from dropping; again this will depend on stakeholder agency – and the value the RESP adds to their organisation/constituency.

The framework for local actor support is well-designed to enhance local capacity, collaboration, and ensuring that local energy planning is aligned with broader strategic goals.

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

We agree with many aspects of the purpose of the Strategic Board, though there are significant concerns about the lack of power of veto and the implications this has for democratic accountability.

The Strategic Board's purpose of facilitating transparency, increasing the visibility of regional priorities, and providing oversight of the RESP development is critical. It ensures that regional voices are heard and that there is a forum for collaboration among key stakeholders, including local government and network operators. This can help align regional energy planning with both local needs and broader national goals.

Providing recommendations and steers:

- Strengths: The Board's role in producing recommendations and providing steers on key decisions allows for a degree of regional influence in the planning process. This can help ensure that the RESP reflects the specific needs and priorities of the region, rather than being purely top-down.
- Concerns: The fact that the Strategic Board does not have the power of veto or final decision-making authority significantly weakens its role. While it can influence the RESP through recommendations, the final decisions rest with NESO. This could lead to situations where the Strategic Board's recommendations are overlooked or ignored, potentially undermining the very regional priorities and democratic input the Board is supposed to represent.

Democratic accountability:

- Concerns: The lack of a veto power for the Strategic Board raises significant questions about democratic accountability. Local authorities, which are directly

elected and accountable to the public, could input marginalised if NESO chooses to proceed in a direction that does not align with the Board's recommendations. This can create a disconnect between the RESP and the democratic will of the people in the region, weakening public/political trust in the planning process.

- Challenge to Accountability: Without real decision-making power, the Strategic Board may struggle to effectively represent the interests of the region. This can lead to a perception that the RESP is being imposed from above, rather than being a genuinely collaborative effort. The lack of a veto power diminishes the Board's ability to hold NESO accountable, potentially leading to outcomes that do not fully reflect regional needs or preferences.

Potential for conflict and inefficiency:

- Concerns: The absence of veto power could also lead to inefficiencies and conflicts in the planning process. If the Strategic Board strongly disagrees with NESO's decisions but has no formal means to block or alter them, it may result in friction and delays. Additionally, local authorities might feel compelled to resist or challenge the RESP through other, less collaborative means, which could slow down the overall progress toward net-zero goals.

Balancing power and accountability:

A more balanced approach could be considered. While the Strategic Board might not have full veto power, it could be granted more substantial influence over critical decisions, and there should be a formal dispute resolution process that gives the Strategic Board a stronger voice in the event of significant disagreements.

Whilst the purpose of the Strategic Board is well-intentioned and aims to enhance regional input into the RESP, the lack of veto power and limited decision-making authority undermine its effectiveness and democratic accountability. For the Strategic Board to truly fulfil its purpose, it needs a more empowered role that ensures regional priorities are not just considered but are integral to the final decisions made within the RESP framework.
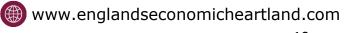
Q11. Do you agree that the Strategic Board should include representation from relevant democratic actors, network companies and wider cross-sector actors in each region?

Yes, WE agree that the Strategic Board should include representation from relevant democratic actors, network companies, and wider cross-sector actors in each region.

Inclusion of democratic actors:

- Strengths: Including democratic actors, such as representatives from local and regional governments, is essential for ensuring that the Strategic Board reflects the will of the public. These actors are directly accountable to voters and bring a necessary perspective on how energy planning aligns with broader social and economic goals.
- Concerns: As mentioned earlier, the lack of veto power limits the influence of these democratic actors, potentially undermining their ability to represent their constituencies effectively. While their inclusion is important, their role must be more than just advisory if true democratic accountability is to be maintained.

Representation from network companies:

- Strengths: Network companies play a critical role in the energy system, and their technical expertise is invaluable in ensuring that the RESP is practical, implementable, and aligned with the realities of energy distribution and infrastructure. Their involvement helps bridge the gap between strategic planning and operational execution.
- Concerns: The inclusion of network companies must be balanced to ensure that their commercial interests do not overshadow the broader public interest. There's a risk that if network companies have too much influence, the RESP could prioritize infrastructure investments that benefit these companies rather than the region as a whole.

Wider cross-sector representation:

- Strengths: Involving a diverse range of cross-sector actors—such as representatives from transport, housing, industry, and environmental groups—ensures that the RESP is holistic and considers the interdependencies between energy and other sectors. This approach fosters innovation and helps identify opportunities for cross-sector collaboration.
- Concerns: While broad representation is valuable, it also poses challenges in terms of decision-making efficiency and clarity. A large, diverse board might struggle to reach consensus, particularly if there are competing interests. This complexity needs to be managed carefully to ensure that the Board remains effective and focused.

Balancing representation with decision-making power:

- Representation must be coupled with meaningful decision-making power, **especially for the democratic actors.** To address the concerns about democratic accountability, the Board should have a more significant role in critical decisions, potentially through mechanisms like weighted voting, supermajority requirements, or formal dispute resolution processes.
- It's also important that the roles and responsibilities of each group are clearly defined to prevent conflicts and ensure that all voices are heard. Democratic actors should be given a strong role in decisions that directly impact the public, while network companies and cross-sector actors should contribute their expertise to ensure that the RESP is technically sound and strategically aligned with regional needs.

- The Board should operate with a high degree of transparency, including clear reporting mechanisms and public accountability – to an extent this is provided by the inclusion of democratic actors – assuming they are given robust powers of veto. This transparency is crucial for maintaining public trust and ensuring that the RESP genuinely reflects regional priorities.

The Strategic Board should include representation from democratic actors, network companies, and wider cross-sector actors, this representation must be meaningful. Democratic actors, in particular, need to have real influence to ensure that the Board is not just a consultative body but a key decision-maker that reflects the will of the public.

Q12. How should actors (democratic, network, cross-sector) be best represented on the board? Please provide your reasoning, referring to each in turn.

To ensure that the Strategic Board is both effective and democratically accountable, the representation of democratic actors, network companies, and cross-sector actors should be carefully structured. Here's how each group could be best represented on the Board:

Democratic actors:

- Representation: Democratic actors should have a prominent and influential role on the Board. This group should include representatives from local and regional governments. Where relevant, combined authorities should represent their constituent lower-tier authorities to streamline decision-making and avoid duplication.
- Reasoning: These representatives are directly elected and accountable to the public, making their role crucial in ensuring that the RESP aligns with the needs and priorities of the local population. Their strong presence on the Board ensures that the RESP is not only technically sound but also socially and politically legitimate. To balance their influence, they should have weighted voting rights or veto power on decisions that have significant social or economic impacts, ensuring that public interests are safeguarded. They are often also involve with other regional/sub regional organisations – LNPs/PRPs and pertinently STBs – so can provide continuity of and alignment of strategic goals.

Network companies:

- Representation: Network companies should have a defined but limited role on the Board, focusing on providing technical expertise and ensuring that the RESP is feasible from an infrastructure and operational standpoint. Their representation could be through a few key senior representatives from the DNOs in the region.
- Reasoning: Network companies bring essential insights into the technical and logistical aspects of energy distribution, which is vital for the realistic and practical implementation of the RESP. However, to prevent any potential conflict of interest, their role should be advisory on technical matters rather than decision-making on broader strategic issues. This ensures that while their expertise is leveraged, the final decisions remain aligned with the public interest as defined by the democratic actors.
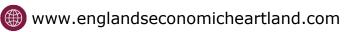
Cross-sector actors:

- Representation: Cross-sector actors should include representatives from key industries such as transportation, housing, environmental organisations, and possibly academia. Participation could be more flexible, potentially through rotating or advisory roles depending on the specific issues being addressed by the Board at any given time.
- Reasoning: Cross-sector actors provide valuable perspectives on how energy planning interacts and enables other key sectors. Their involvement ensures that the RESP is holistic and considers the broader socio-economic and environmental context. Unless operating in a statutory context - their role should be to inform and advise on specific issues rather than having a permanent seat with decision-making power. This approach allows for the necessary input without overcomplicating the decision-making process.

Representation on the Strategic Board should be structured to ensure that democratic actors have the most significant influence, reflecting their accountability to the public.

Network companies should provide technical guidance without dominating the decision-making process, while cross-sector actors should inform the Board on specific issues without complicating its core functions.

This structure balances the need for technical expertise, cross-sector collaboration, and democratic accountability.

Q13. Do agree with the adaptations proposed for Option 1? Please provide your reasoning.

Yes – from the EHH perspective we are supportive of the blended approach of using both STB and ITL1 regions. It strikes a balance between respecting established economic areas and ensuring that regions are not too large to manage effectively. This approach could enhance the responsiveness and relevance of the RESP to local conditions, which is crucial for effective implementation and importantly aligns with existing political and governance structures.

Q14. Do you agree with our assessment that Option 1 is a better solution than Option 2? Please provide your reasoning.

Yes: The blended approach of Option 1, which combines Sub-national Transport Body (STB) boundaries with International Territorial Level 1 (ITL1) regions, is more closely aligned with our region's existing strategic and institutional arrangements. This alignment ensures that the RESP development can proceed at a pace necessary to meet pressing infrastructure needs. Option 1 leverages established relationships and governance structures, which can facilitate smoother implementation and cooperation across different levels of government and sectors. By retaining elements of the STB boundaries, which are often more closely aligned with local economic and social contexts, this option allows for more nuanced and locally relevant planning. This flexibility is crucial for addressing the diverse challenges and opportunities across different regions.

We note that there is some risk – poor implementation and governance could disrupt these established relationships. however, these challenges are outweighed by the benefits of maintaining established relationships and ensuring the plan's relevance to regional contexts. Therefore, Option 1 represents a more balanced and practical approach to developing the RESP.

Q15. Do you agree a single region for Scotland is optimal? If you think a two-region solution is better, do you agree the split should occur at the SSEN and SPEN DNO boundary? If not, please provide your reasoning and alternative option(s)

N/A