

EA Technology
Capenhurst Technology Park
Capenhurst
Chester
CH1 6ES
13 April 2018

Dear Sir/Madam

Consultation on the Interim Solution for Domestic Managed Electric Vehicle Charging

Scottish Renewables is the representative body for the renewable energy sector in Scotland, working to grow a sustainable industry which delivers secure supplies of low-carbon, clean energy for heat, power and transport at the lowest possible cost. We represent around 270 organisations ranging from large suppliers, operators and manufacturers to small developers, installers and community groups, and companies right across the supply chain.

The Scottish Government's Energy Strategy has set out ambitious plans integrate our electricity, heat and transport sectors, and Ofgem and BEIS have committed to a smart systems and flexibility plan. Scottish Renewables welcomes SSENs efforts to make this transition as smooth as possible with minimal disruption and cost to customers.

Scottish Renewables broadly welcomes the Scottish Government's ambition surrounding electric vehicles (EVs), as we recognise that the decarbonisation of both transport and heat sectors as well as electricity generation is crucial if we are to meet our Climate targets and objectives. We do however recognise that these ambitions could have significant impact across the electricity network.

With the electricity network across Scotland heavily constrained, renewable energy generators often face significant delays in connection to the network and can encounter costs associated with network reinforcement. In order to meet our climate targets the Committee on Climate Change sets out that we need to see a doubling of renewable generation capacity across the GB system¹.

¹ <https://www.theccc.org.uk/publication/the-fifth-carbon-budget-the-next-step-towards-a-low-carbon-economy/>

While we welcome efforts from DNOs to operate more flexibly to enable further renewable penetration, as we look to the next price control period we would expect the requirement for network reinforcements to continue to grow.

We would strongly therefore encourage DNOs to think about how the management of EVs on the system can be used to enable efficient use of the network by existing customers (such as constrained renewable assets) and enable further renewable generation to come forward and develop.

Scottish Renewables welcomes SSENs engaged approach to safeguard the customer against imminent supply issues as a result of increased use of electric vehicles. However, it is essential that once deployed, it does not block the prospect of an enduring market-based solution from taking hold. It is understood that SSEN plan to periodically test the market to assess whether a suitable demand-side response service is available. More detail on this process would be welcome, as well as making information on specific network areas available, ideally ahead of need, to give the market warning where and what solutions are likely to be required. We welcome SSEN's plan to decommission any interim solution once it can be shown that the same result can be achieved through a reliable, robust market offering.

Scottish Renewables also supports the long-term proposal to use smart meters to adjust electric vehicle charging rates. This proposal, if well managed, could support smart systems and flexibility ambitions whilst benefitting the following stakeholders:

- Energy suppliers, who may benefit from modifying the demand of their customer base in line with energy price drivers
- Aggregators / third parties, who are interested in using the solution to help balance supply and demand participating in System Operator services
- Network operators, who may use the solution to maintain network resilience.

We would be happy to work with you further in this area, and should you have any questions please don't hesitate to contact us.

Yours sincerely,



Joe Mitchell
Policy Officer