Energy Networks Association Open Networks Programme: Consultation on future worlds impact assessment

Response by Community Energy England
May 2019

We would like to commend the work that the ENA Open Networks project is undertaking and the assessment of the impact of 5 potential Future Worlds that have been outlined.

Community Energy England and the community energy sector

Community Energy England (CEE) was established in 2014 to provide a voice for the community energy sector, primarily in England. Our vision is of strong, well informed and capable communities, able to take advantage of their renewable energy resources and address their energy issues in a way that builds a more localised, democratic and sustainable energy system.

Membership of CEE totals over 200 organisations. The majority of member organisations are from the community energy sector but the membership extends across a wide range of organisations that work with and support the community energy sector. Our members are involved in the delivery of community-based energy projects that range from the generation of renewable electricity and heat, to the energy efficiency retrofit of buildings to helping households combat fuel poverty.

These schemes have in the main been developed by volunteers, who have given countless hours of time, working through complex technical, legal and regulatory aspects of designing an energy project. These groups have also gone on to raise millions of pounds investment from their local communities to deliver these schemes – typically sited in challenging locations which commercial developers ignore – from church roofs and school buildings to inner London tower blocks to remote Scottish islands.

Feedback on the Impact Assessment

The summary of trade-offs outlined in the document is helpful. We believe that rapid decarbonisation should be a priority when deciding which Future World(s) to progress and that emphasis should be placed on optimising the use of flexible resources. We agree with the approach to including Ofgem’s work on reforming charging and access arrangements in all Future World scenarios however, we would like to highlight our concerns relating to that work. Ofgem’s reforms as currently proposed risk undermining the government’s stated ambitions for local generation, community energy and energy efficiency – as well as new smart solutions such as DSR and storage. The Targeted Charging Review, for instance, has not been designed in a way that will incentivise the sorts of investment and behaviour that communities – and the government – wish to see. You can find more detail on our views relating to this in our recent response to the TCR.
We also refer to Regen’s response to the previous Future World’s consultation which outlines the need to provide information and appropriate routes to market for community energy and to ensure that flexibility is procured in a manner that enables community energy to participate.

The barriers facing community energy and other local energy stakeholders and the additional value that they can bring to the energy system should be investigated as part of your future work plan. We do acknowledge and appreciate that the ENA has listened to concerns raised regarding consultation periods and as such extended the time period for this consultation. Building upon this as part of the next stage of work, specific focus sessions or materials for communities would be valuable.

We would welcome the opportunity to work with the ENA to continue to develop solutions to ensure that the value that community energy brings is not lost within the transition to a low-carbon, cost-effective energy future.

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