Guidelines for responding to the National Energy Strategy Consultation

Title - Formation of a consolidated Welsh public energy company

Deadline 30th November

The aim of this guide is to help residents in Rural Wales who have concerns about the planned imposition of industrial infrastructure in their area or throughout Wales. The consultation consists of 27 questions.
If you have limited time just pick 6 questions below that are important to you.
If you have more time, include more of these - 1,2,4,6,7,8,9,12,13,14,17,20,,25,27.
These questions have been identified as the most appropriate to answer.You do not need to answer them all, or use all of the suggestions.
Pick what makes sense to you.Use only the suggestions that match your views.
Put responses in your own words where you can.

Instructions

Read the consultation document for insights to the questions. If you want a more focussed and manageable approach, start at section **7. Proposal for initial change** and focus on the questions that are suggested.
https://www.gov.wales/formation-consolidated-welsh-public-energy-company-html

Go to the consultation questions. For easy access they are listed at the bottom of the consultation document. Draft your answers on your own, separate document using any suggestions that help. When you have finished, copy and paste your answers into the online form. Where it asks if you agree or disagree, tick one or none depending on how you will answer the question.

Online response form https://www.gov.wales/node/78213/respond-online

Excerpt from the consultation paper -
Executive Summary
"The Welsh Government is consulting on the creation of a single, publicly owned energy company for Wales. The proposed company would bring together existing energy delivery functions, creating a stronger national capability to develop renewable energy, support local ownership, attract investment and ensure that more of the economic value from Wales's energy resources benefits people and communities in Wales. "

Frame your responses as - what you would like Ministers to consider as they develop these parts of the National Energy Strategy

Q1 - Do you agree that a single Welsh energy company would add value and lead to better outcomes for people? What do you see as the potential benefits and risks, and how could we maximise/minimise them?

Benefits and risks of bringing Trydan Gwyrdd Cymru and Ynni Cymru together.

- The first manages industrial-scale energy development. The second manages community/shared and local energy. A risk is that Ynni Cymru might be overshadowed and industrial projects prioritised.
- Who decides what is best for individual communities and for Wales as a whole. Should it be a wider discussion, rather than a group of Ministers based in Cardiff?
- Will the financial return be the main measure of success or will it require equal consideration of environmental, social and community impacts?
- The Company should recognise rural communities who are disproportionately affected by large energy projects and ensure a structure is in place to support them.
- Establish Wales's actual future energy "needs" before any further large-scale developments are approved.
- Ensure transparency on how much electricity Wales intends to export. Citizens can not consider whether there are too many projects planned, or not, if this basic information is not made public.

Q2 — Do you agree that it makes sense to use the existing company, Trydan Gwyrdd Cymru, as the basis for the new Welsh public energy company?

- Design the organisation around its full proposed role, properly integrating nature, climate and communities. Rather than simply expanding Trydan Gwyrdd Cymru which currently has a limited remit of developing industrial scale energy projects with existing generation targets.

Q4 - Should the new company retain the name Trydan Gwyrdd Cymru, adopt the name Ynni Cymru, or use a different name? Please explain your preference.

- If you think Ynni Cymru attracts positive community associations, that a company doing utility scale development would benefit unfairly, say so. This is a point about transparency not just branding.
- The name shouldn't obscure which kind of activity (community scale versus industrial scale) people are actually dealing with.
- One option - Keep the names for separate departments, with a new name for the umbrella company.

Q6 — What models, mechanisms or requirements should be used to ensure that the company returns the right level of value to Wales? How should the company balance its need for resourcing to deliver with the return of value to people?

- Define “value to Wales” more broadly than financial returns or Welsh ownership.
- Include rural community wellbeing and resilience in the measure of value.
- Consider landscape, biodiversity, tranquillity, noise, traffic and infrastructure.
- Consider cultural and the Welsh language value.
- Assess who receives the benefits and who bears the impacts. Changes should be made to the criteria of community benefits in order to use benefits to support those who experience negative impacts in current and future developments. Particularly when communities have no choice but to host developments.
- Public ownership should not automatically be regarded as sufficient public benefit.
- Avoid repeating the problems of past extractive approaches where communities carried the costs while others received the benefits.

Q7 — Do you agree with the principle of first offering suitable areas of public land, which are suitable for development, to the publicly owned company to consider developing for the public good?

- Public ownership does not mean that energy development is automatically appropriate.
- Define “suitable” land using environmental, landscape, biodiversity and community considerations.
- Swaiths of land have been designated “Pre-Assessed Areas for Wind Energy”. Cumulative impacts should be considered before more land is allocated to onshore wind.
- Publicly owned land should not remove the need to protect rural communities.

Q8 — Under what circumstances should the company sell consented projects rather than retain ownership and operation?

- Retaining ownership should be the default and any sale should require independently verified pricing and have a transparent process.
- Consider whether decisions should take account of long-term community and environmental interests, and future generations ability to meet their needs, not simply the financial returns.

Q9 — Do you believe the company should seek 100% Welsh public sector ownership of its projects, or should it look more broadly for available capital? Do you have any other thoughts on raising capital?

- Without publicly publishing projected figures and options, citizens are not likely to be able to draw considered conclusions.
- Consider whether funding decisions should be based **only** on financial returns to Wales. Environmental and social consequences should count towards public value.
- If the number of projects were reduced, would there be more likelihood that Wales will be able to own its own projects? Is it necessary to maximise the size and number of projects and stretch finances, energy production and the grid to the limit?

Q12 — Do you agree that Ynni Cymru moving from capital grants to an investment model is a rational change?

Consider the risks of replacing grants with investment.

- Will smaller projects be disadvantaged simply because they have lower financial returns?
- Investors' aims may conflict, as success is based on good returns. Protect the wider purpose of community energy.
- Ensure transparency regarding how financial returns are balanced against community interests when making considerations about moving from grant to investment model.

Q13 — Do you agree that providing technical support to community energy groups for renewable energy projects should be a function of the new company?

- Advice is only useful if it is independent of the advisors' own commercial interests. Suggest this function sits with a body that isn't also competing for the same land, grants, grid capacity and funding as the communities it is advising

Q14 — Do you agree that capital grants and publicly financed loans should continue to be provided for these projects?

- Grants preserve full community ownership in a way that an investment model does not.
- Grants and loans are more likely to provide the support that enables less-resourced communities to participate meaningfully.

Q17 — Do you agree that Welsh Government should set a policy expectation that some amount of local ownership (such as 15 to 25%) should be required for large scale (>5MW)energy projects in Wales?

- "Local" in this instance is defined in government policy as "Wales wide" and includes big business, estates, organisations and local authorities. This is not what most people will consider "local" to mean and this question will not facilitate accurate comments.
- "Local" ownership is not a substitute for addressing communities' impacts.
- Distinguish between financial benefit and community wellbeing, in order that it is not overlooked.
- Ensure local ownership has **additional** requirements of - proper ongoing assessment tools and systems, mitigation and community protection throughout the life of the project.
- Consider whether those **most directly affected** should receive a meaningful share of any benefits. (The current approach is to deny recognition and benefits to any resident claiming to have negative impacts).

Q20 — Shared ownership is about retaining value in Wales. Do you agree that Trydan Gwyrdd Cymru's projects, as they are wholly publicly owned already, should not be expected to fulfil a shared ownership requirement?

- Public ownership should not exempt a project from shared ownership requirements as it should be held to the same rules as private developments.
- Public ownership of the company does not automatically mean local benefit. Shared ownership may give communities some influence over local impacts and benefits.

Or the opposite view -

- A publicly owned project should be exempt as long as there are transparent mechanisms in place to ensure that a meaningful and appropriate level of benefits/profits are fed back into the Community Benefit Fund and Wealth Fund.
- Not implementing a shared ownership scheme for publicly owned projects could save a vast amount of money and human resources. These funds could then provide direct financial benefits for impacted communities and other deprived communities.
- If a publicly owned project is located in, or substantially affects a particular rural community, that community should still have meaningful opportunities to influence how benefits are delivered and how local impacts are addressed, without the need to have shared ownership. It could be considered an additional burden.
- Communities should have access to independent advice and representation so that their interests are not assumed to be identical to those of the company. If communities' interests are **not** identical to the companies, shared ownership could be problematic.
- The company should also not use shared ownership as evidence that a development necessarily has community consent.

Q25 — What, in your opinion, would be the likely effects of the proposals on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- **Do you think that there are opportunities to promote any positive effects?**
- **Do you think that there are opportunities to mitigate any adverse effects?**

- Assess the potential effects of major infrastructure projects on small rural communities.
- Consider whether population changes could weaken community resilience.
- Consider whether people moving away could reduce opportunities to use Welsh in everyday life.
- Assess whether temporary or permanent changes in local populations could affect the future strength of the Welsh language locally.

Q27 — We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Use this question to address any concerns that may not have been fully addressed elsewhere.

- Using Wales as a “test bed”. Wales may benefit from innovation, but only with strong safeguards to protect citizens and countryside and considering the potential health, environmental, social and cumulative impacts of experimental or innovative energy projects.
- Ensure rural communities are not used as testing grounds without proper assessment.
- Welsh Government guidelines must use uptodate, proven scientific methods for - noise, infrasound and other potential negative impacts. Currently some assessment methods are lacking and are not trusted in regard to providing adequate protection.

- Communities need to have faith in assessment and monitoring methods. Perceived inadequate safeguards may leave communities feeling responsible for proving that they are being harmed. Creating further negative impacts on wellbeing.
- Make protection of rural communities and the natural environment an explicit responsibility.
- Develop ways of assessing cumulative impacts.
- Consider long-term community resilience.
- Publish information showing:
    - where projects are located;
    - what impacts they create;
    - who receives the benefits;
    - how local concerns have been addressed.
- The consultation should make a clear distinction between **community financial benefit** and **community wellbeing**. Community wellbeing should be considered with the same weight as financial benefits.
- Address how claims of harm to health and wellbeing are currently being ignored, when current science that supports these claims has legitimate scientific basis.
- Consider whether current Community Benefit arrangements are sufficient to build trust and are fit for purpose. Should impacted communities have input into how these benefits could be better distributed?
- The move to renewable energy is important, but projects need to be proportionate and cumulative effects better assessed . Onshore wind is not the only answer to our future energy solutions. Other technology options should be considered with more weight and without maximum profits being the predominant driver.
- Maximising onshore wind turbines on hilltops, without plans for an adequate grid in place, and with an unknown “need” is a reckless approach.
- Make the protection of rural communities and the environment a fundamental part of the National Energy Strategy and an explicit responsibility