

**Global Offshore Wind Investment Conference – Briefing for Kersti Berge**  
**Monday 17 March 2025**

[OUT OF SCOPE]

**Annex C**

**Top Lines on UK Government Reforms**

- [OUT OF SCOPE]
- The CfD reforms cannot be considered in isolation and must take into account wider reforms currently underway (REMA/TNOUS/zonal pricing) to understand the cumulative impact of these on the development and deployment of offshore wind projects in Scotland.
- [OUT OF SCOPE]

[OUT OF SCOPE]

**2.3 Wholesale Electricity Markets - REMA**

**The Scottish Government is clear that the current wholesale electricity market is not fit for the delivery of our net zero ambitions, nor our aims to tackle fuel poverty.**

- [OUT OF SCOPE]
- We recognise the trade-offs and complexities in the debate around zonal pricing and are aware that its introduction could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- Mitigations for any potential negative impacts must be put in place by UK Government and clearly signalled to the market at the same time as the decision is announced this summer.
- We have engaged widely with stakeholders to understand the impacts that market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.

**Background Briefing**

- [OUT OF SCOPE]
- However, the renewables industry is clear that zonal pricing will introduce considerable additional risk for current and future projects. As well as increasing the amount of low/negative price periods, it will also remove their firm access rights to a national market, limiting the amount of electricity they can sell.
- The industry suggest that these risks will increase the cost of capital for projects and deter investment. Any cost of capital, they argue, will lead to increased consumer bills by necessitating higher bids in CfD auctions.

[OUT OF SCOPE]

**Briefing For The Cabinet Secretary For Net Zero And Energy – Global Offshore  
Wind Investment Forum**  
**Monday 17 March 2025**

[OUT OF SCOPE]

[R. Reg (10(4)(e))]

**REVIEW OF ELECTRICITY MARKET ARRANGEMENTS (REMA)**

[OUT OF SCOPE]

- Reforms must deliver reduced costs for Scottish consumers, to ensure our communities feel the benefit of the energy transition, while also protecting investment in our renewables industry.
- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.

**We continue to engage widely with stakeholders to understand the full impacts market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.**

- The Scottish Government recognises the importance of greater system planning and accelerated network buildout alongside electricity market reform.
- Reforms delivered through REMA must reduce costs for Scottish consumers, ensure our communities feel the benefit of the energy transition and protect investment in our renewables industry.
- We recognise the trade-offs and complexities in the debate around zonal pricing and are aware that its introduction could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- Mitigations for any potential negative impacts must be put in place by UK Government and clearly signalled to the market at the same time as the decision is announced this summer.

[OUT OF SCOPE]

**Offshore Wind Executive Board 6-9 June 2025 – Board Pack**

**Risks [OUT OF SCOPE]**

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<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b> CfD reforms cannot be considered in isolation and must take into account wider reforms currently underway (REMA and zonal pricing/TNUoS) to understand the cumulative impact of these on the development and deployment of offshore wind projects in Scotland. <b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
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<b>OUT OF SCOPE</b>	<b>[R. Reg 10(4)(e)]</b>	<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>

**[OUT OF SCOPE]**

**Minister for Climate Change – Dr Alasdair Allan**  
**Low Carbon Contracts Company Briefing – 16 January 2025 at 9.30 am**

[OUT OF SCOPE]

**Position on Review of Electricity Market Arrangements (REMA)**

- OUT OF SCOPE
- [R Reg 10(5)(f)]

**ANNEX H**

**Review of Electricity Market Arrangements (REMA) – Top Lines**

- [OUT OF SCOPE]
- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- That is why we commissioned independent research to inform our position on Locational Marginal Pricing. The study benefited from wide engagement across industry, including Scottish Renewables who joined our expert panel. This research was published on 12 August 2024.
- [OUT OF SCOPE]

## **Meeting Note – Cab Sec NZE roundtable with Prosper members regarding zonal pricing – 1 May 2025**

**09:00-10:00, 4W.01, St Andrew's House**

### **Attendees:**

Scottish Government:

- Gillian Martin – Cabinet Secretary for Net Zero and Energy
- Catherine Williams – Deputy Director, Onshore Electricity and Strategy
- Laura Murdoch – Deputy Director, Offshore Wind Skills and Policy
- [R. Reg 11(2)]

Prosper and industry members:

- Sara Thiam – Prosper
- Garth Williams – Prosper
- Mike Hay – West of Orkney Windfarm
- Phil Henderson – Scottish Power
- Niall Murphy – SSE
- Mike Engelbrecht – Sumitomo
- Andrew MacNish-Porter – Scottish Renewables
- Martin Whyte – Northland Power
- Stuart McAuley – West of Orkney Windfarm
- Mark Baxter – Ocean Winds
- David Robertson – Nadara/Blue Float
- Ian Taylor – Thistle Wind Partners

### **Meeting note:**

1. The Cabinet Secretary introduced the meeting, noting the complexities of the zonal pricing issue and its potential impacts. She noted that the industry letter to the Prime Minister said there would be 'better and more workable reforms' than zonal pricing, and raised the challenge for industry to clearly set out what that alternative solution could look like in terms of tangible benefits for people.
2. The key points raised by industry attendees were:
  - Industry confidence being inhibited by high Transmission Network Use of System (TNUoS) charges and ongoing uncertainty on market reform, putting investment in renewables and the wider supply chain at risk.
  - Arguments that shorter-term measures to reduce costs for consumers – such as a social tariff and reducing non-energy policy costs on bills – would be more effective than zonal pricing and avoid the risk of losing momentum on investment.
  - The potential for consumers to also benefit from a rapid deployment of renewables by reducing reliance on the global price of gas.
  - Concerns that if consumer costs are levelised in a zonal system, it could be the 'worst of both worlds' for Scotland where consumers miss out on benefitting from lower costs but renewables and network investment could still be reduced.
  - Concerns that the UK Government's Industrial Strategy Council does not include a representative with expertise in energy investment in Scotland.

- Concerns that the Secretary of State might not make a clear decision and therefore prolong market uncertainty.
  - The need to clearly articulate the public value of renewables development in terms of community and local benefits, supply chain growth, local investment, infrastructure, housing, and jobs; and to deliver renewables projects with those tangible benefits in order to maintain public support throughout the transition.
  - The importance of Union involvement in the public discourse on zonal pricing.
  - The cumulative risks of a declining North Sea oil and gas basin, lack of progress on the Acorn project, and potentially reduced renewables investment due to market uncertainty, for the energy industry and wider supply chain jobs.
3. The Cabinet Secretary said that any market reforms must protect investment and maintain Scotland's position as a prime mover on renewables. She emphasised the need to clearly and simply articulate the wider social and economic benefits of the renewables transition.
  4. The Cabinet Secretary said that the electricity markets debate should not just be about the binary choice of zonal or national, but also what can be done now to reduce bills and secure clear benefits for the people of Scotland. She described ongoing engagement with the UK Government to set out the need for a social tariff to reduce bills in the short-term. She also noted engagement with the UK Government on decoupling gas and electricity prices.
  5. Sarah Thiam said she is grateful for the Scottish Government's ongoing engagement with the UK Government and industry on zonal pricing issue, and noted the key points from the discussion on the need for industry to articulate what the benefits of an alternative to zonal pricing might be for consumers.

## **Offshore Wind - Ports - Cab Sec NZE Visit to Port of Aberdeen - 19 May 2025 - Briefing**

[OUT OF SCOPE]

### **CONTRACTS FOR DIFFERENCE (CFD)**

[OUT OF SCOPE]

- The CfD reforms cannot be considered in isolation and must take into account wider reforms currently underway (REMA/TnUOS/zonal pricing/reforms to the connections queue process) to understand the cumulative impact of these in unlocking Scotland's vast offshore wind potential and the economic benefits it brings.
- [OUT OF SCOPE]

[OUT OF SCOPE]

**OUT OF SCOPE**

**REVIEW OF ELECTRICITY MARKETS ARRANGEMENTS (REMA)**

**We are aware that the introduction of zonal pricing could impact market participants in different ways - from renewable generators and hydrogen producers to suppliers and consumers.**

- We continue to engage widely with stakeholders to fully understand the impacts market reforms could have in Scotland.

**OUT OF SCOPE**

## **Offshore Wind Policy - Briefing - Cab Sec NZE - Meeting with EDPR - 3 June 2025**

Cabinet Secretary for Net Zero & Energy - Gillian Martin  
**Briefing for meeting EDP Renewables (EDPR)**

OUT OF SCOPE

### **1. Zonal pricing**

- Discussion points: What is EDPR's view and key concerns about the introduction of zonal pricing and its impacts on your Scottish projects?
- What actions should be taken by the Scottish and UK Governments to ensure investor confidence?

#### Lines to take:

- [OUT OF SCOPE]
- I recognise the trade-offs and complexities in the debate on zonal pricing.
- The Scottish Government is aware that the introduction of zonal pricing could have significant impacts for all market participants.
- Reforms must reduce costs for Scottish consumers, ensure our communities feel the benefit of the energy transition, and protect investment in our renewables industry.
- The FM recently chaired a roundtable with industry and consumer representatives to discuss the potential impacts of zonal pricing on renewables development and consumer costs.
- [OUT OF SCOPE]

[OUT OF SCOPE]

**Offshore Wind Policy - Minister for Public Finance - SR Offshore Wind Conference Dinner - 22 January**

Minister for Public Finance – Ivan McKee

**Briefing for SR Offshore Wind Conference Dinner 2025**

[OUT OF SCOPE]

**REVIEW OF ELECTRICITY MARKET ARRANGEMENTS (REMA)**

- [OUT OF SCOPE]
- Crucially, this must be balanced with the vital need to ensure that levels of investment in renewables, flexibility and networks are protected and enhanced, so we maximise the economic opportunities afforded by the net zero energy transition.
- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- That is why we commissioned independent research to inform our position on Locational Marginal Pricing. The study benefited from wide engagement across industry, including Scottish Renewables who joined our expert panel. This research was published on 12 August 2024. We welcomed the UK Government's recent update on the timetable for decision making on proposals to reform GB electricity market arrangements. However, it is crucial the UK Government now delivers proposals quickly to maintain investor confidence.
- We continue to engage widely with stakeholders to further understand the impacts market reforms could have in Scotland. In December 2024, Scottish Government participated in the first Electricity Markets Forum hosted by University of Edinburgh, ClimateXChange and the Royal Society of Edinburgh.

[OUT OF SCOPE]

**GLOBAL OFFSHORE WIND INVESTMENT FORUM**

**Sunday 16 March – Monday 17 March 2025**

- [OUT OF SCOPE]

**Review of Electricity Markets Arrangements (REMA)**

- [OUT OF SCOPE]
- Developers must be given clarity on REMA - and the implications of the outcome for both TNUs charging and Contracts for Difference - well in advance of AR7 bidding process starting. Can you provide an update on timings for providing this?

[OUT OF SCOPE]

**ANNEX D**

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OUT OF SCOPE	<ul style="list-style-type: none"><li>• OUT OF SCOPE</li></ul>
<b>Sensitivities</b>	<ul style="list-style-type: none"><li>• OUT OF SCOPE</li><li>• We are aware that the introduction of zonal pricing could have significant impacts for all market participants. That is why we commissioned independent research to inform our position on LMP. This research was published in August 2024.</li><li>• OUT OF SCOPE.</li></ul>

OUT OF SCOPE

## **Michelle Quinn and Dr Allan - Briefing - 13th March**

### **Michelle Quinn and Dr Allan – Catch Up Meeting – Briefing**

[OUT OF SCOPE]

#### **Zonal Pricing**

**Issue:** Industry has expressed concerns on the proposed introduction of Zonal Pricing. As offshore wind developers are unable to relocate projects to respond to locational signals, the introduction of zonal pricing could have significant impact for projects based further away from demand, which may impact consumers and investor confidence. The industry is concerned that the increased risks associated with zonal pricing will increase project financing costs. Conversely however, zonal pricing may deliver reduced costs for Scottish consumers.

**Asks of UKG:** Reforms must deliver reduced costs for Scottish consumers, ensure our communities feel the benefit of the energy transition and protect investment in our renewables industry. Mitigations for any potential negative impacts must be put in place and clearly signalled to the market at the same time as the decision is announced.

**Background:** Offshore wind industry stakeholders have written two open letters to UKG (21 Feb and 23 Feb). The first expresses concern over the impact the proposed reforms will have on the UK's clean energy ambitions. The second on the impact zonal pricing will have on energy pricing and industry competitiveness. We continue to engage with stakeholders to understand the impacts market reforms could have in Scotland.

[OUT OF SCOPE]

**OFF-SEN Commercial- Offshore Wind Policy - ETZ Roundtable Dinner - Deputy First Minister Briefing Pack - 13 March 2025**

[OUT OF SCOPE]

**Review of Electricity Market Arrangements (REMA)**

- [OUT OF SCOPE]
- Reforms must deliver reduced costs for Scottish consumers, to ensure our communities feel the benefit of the energy transition, while also protecting investment in our renewables industry.
- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- Mitigations for any potential negative impacts must be put in place and clearly signalled to the market at the same time as the decision is announced.
- We continue to engage widely with stakeholders to understand the full impacts market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UKG.
- [OUT OF SCOPE]

[OUT OF SCOPE]

**Offshore Wind Policy – Ministerial Briefing – Cabinet Secretary for Net Zero and Energy – Ocean Winds Parliamentary Reception - 25 Feb 2025**

<b>What</b>	Keynote speech at Parliamentary reception – <b><i>Unlocking Scotland’s Offshore Wind Potential</i></b>  Hosted by Ocean Winds, sponsored by Karen Adam MSP
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**[OUT OF SCOPE]**

**REMA**

- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- That is why we commissioned independent research to inform our position on Locational Marginal Pricing. The study benefited from wide engagement across industry, including Scottish Renewables who joined our expert panel. This research was published on 12 August 2024.
- We continue to engage widely with stakeholders to understand the impacts market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.

**[OUT OF SCOPE]**

**Offshore Wind Policy - Contracts for Difference - CfD Reform Consultation - Advice and draft UKG letter for Cab Sec - Final - 19 March**

Directorate for Offshore Wind  
19 March 2025

**Acting Cabinet Secretary for Net Zero and Energy**

**Contracts for Difference Consultation: Update and Response to the UK Government**

[OUT OF SCOPE]

**ANNEX A**

Cabinet Secretary for Net Zero and Energy  
Gillian Martin MSP

 **Scottish Government**  
Riaghaltas na h-Alba

T: 0300 244 4000  
E: scottish.ministers@gov.scot

The Rt Hon Ed Miliband MP  
Cc: Michael Shanks MP  
House of Commons  
London  
SW1A 0AA

March 2025

**Response to the consultation on further reforms to the Contracts for Difference (CfD) scheme for Allocation Round 7 (AR7)**

[OUT OF SCOPE]

Clearly, CfD reforms must be considered as part of the wider set of UK Government reforms currently underway, such as the Transmission Network Use of System (TNUoS) charges and the potential introduction of zonal pricing, to understand the cumulative impact on the development and deployment of offshore wind projects in Scotland.

[OUT OF SCOPE]

Gillian Martin MSP  
Acting Cabinet Secretary for Net Zero and Energy  
The Scottish Government

## **Offshore Wind Policy - Ministerial Briefing - ScotWind Roundtable 05.02.2025**

Cabinet Secretary for Net Zero & Energy - Gillian Martin

### **Briefing for ScotWind Roundtable**

[OUT OF SCOPE]

#### **REMA**

- If the UK Government decides to introduce zonal pricing, what are the potential risks for offshore wind projects and how can those be mitigated?

[OUT OF SCOPE]

#### **REMA**

- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- That is why we commissioned independent research to inform our position on Locational Marginal Pricing. The study benefited from wide engagement across industry, including Scottish Renewables who joined our expert panel. This research was published on 12 August 2024.
- We continue to engage widely with stakeholders to understand the impacts market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.

[OUT OF SCOPE]

**Offshore Wind Policy - DFM speaking note - ETZ roundtable dinner - 13 March 2025**

DFM “opening reflections / scene setting” speaking note – ETZ roundtable dinner – 13 March

[OUT OF SCOPE]

We are aware that the introduction of zonal pricing could have significant impacts for all market participants. Mitigations for any potential negative impacts must be put in place and clearly signaled to the market at the same time as the decision is announced.

[OUT OF SCOPE]

## **Meeting Note - FM Roundtable - Zonal Pricing - 16th April 2025**

**First Minister – Discussion with stakeholders on zonal electricity pricing  
16<sup>th</sup> April 2025, 12:00-13:00  
Bute House**

### **Attendees:**

#### Scottish Government

- First Minister
- Minister for Climate Action (joined online via Teams)
- Emily Mackintosh, Special Adviser
- Ragne Low – Deputy Director, Offshore Wind Programme & Investment
- [R. Reg 11(2)]

#### Stakeholders

- Lewis Shand-Smith, Chair of Energy Consumers Commission
- Sam Ghibaldan, Chief Executive, Consumer Scotland
- Charlie Jordan, CEO, Scottish Power Renewables
- Alistair Phillips-Davies, CEO, SSE
- Reuben Aitken, Managing Director for Energy Transition and International Operations, Scottish Enterprise

### **Summary of discussion:**

[OUT OF SCOPE]

The key points discussed were:

- [OUT OF SCOPE]
- Significant industry concerns about the potential impacts of zonal pricing on investment decisions for renewables projects, due to the need for certainty on returns on the significant capital investments required. Industry representatives set out evidence in support of their view that uncertainty on investment returns (caused by introducing zonal pricing) could deter investment from Scotland.
- [OUT OF SCOPE]

## **FM Roundtable - Zonal Pricing - Briefing Pack - 16 April 2025**

### **BRIEFING FOR THE FIRST MINISTER ROUNDTABLE ON ZONAL ELECTRICITY PRICING 16 APRIL 2025**

<b>Key message</b>	The debate on REMA is complex. I am concerned about the impact high energy bills have on people in Scotland, with 34% of households in Scotland in fuel poverty, and we continue to call on the UK Government to take action to address this. But I am also concerned about a decision that could result in undermining investment in renewable generation in Scotland. I am keen to understand more about both sides of this argument. This will inform the upcoming Ministerial engagement we will have with the UK Government in advance of them reaching their final decision on REMA.
<b>What</b>	Chairing a roundtable with a subset of members of the Scottish Energy Advisory Board (SEAB) to discuss their position on zonal electricity pricing, which the UK Government is considering as part of the ongoing Review of Electricity Market Arrangements (REMA). This is a follow-up to the SEAB meeting on 4 <sup>th</sup> February where attendees raised various views about the impacts of zonal pricing, particularly in relation to renewables development and consumer bills.
OUT OF SCOPE	OUT OF SCOPE
<b>Who</b>	<ul style="list-style-type: none"><li>• Lewis Shand-Smith, Energy Consumers Commission</li><li>• Sam Ghibaldan, Consumer Scotland</li><li>• Charlie Jordan, CEO, Scottish Power Renewables</li><li>• Alistair Phillips-Davies, SSE</li><li>• Reuben Aitken, Scottish Enterprise</li></ul> The Minister for Climate Action will join online via Teams.
OUT OF SCOPE	OUT OF SCOPE
OUT OF SCOPE	OUT OF SCOPE
<b>Likely themes</b>	<ul style="list-style-type: none"><li>• Renewables developers' concerns that zonal pricing would reduce certainty that electricity prices will offer a return on capital investment, making some Scottish renewables projects unviable or slowing their development.</li></ul>

	<ul style="list-style-type: none"> <li>The opportunity zonal pricing may offer for consumers in Scotland to benefit from the lower costs of renewables; and conversely, the risk this could be offset by increased bills due to renewables development being disincentivised.</li> </ul>
OUT OF SCOPE	OUT OF SCOPE
<b>Supporting officials</b>	Ragne Low, Deputy Director, Offshore Wind Programme & Investment [R. Reg 11(2)]
OUT OF SCOPE	<ul style="list-style-type: none"> <li>OUT OF SCOPE</li> </ul>

## ANNEX A

### Summary

- [OUT OF SCOPE]

### **Suggested questions to ask when chairing:**

#### For industry attendees:

- The industry's opposition to zonal pricing is very clear. What evidence do you have as to the scale of the impact that are you are suggesting this will have.
- Can you provide me with any examples of how this is impacting decision making within your businesses?
- [OUT OF SCOPE]

### **Background – SEAB discussion**

- At the Scottish Energy Advisory Board meeting on 4<sup>th</sup> February, industry and consumer representatives raised various views about the impacts of zonal pricing, particularly in relation to renewables development and consumer bills.
- [R. Reg 10(4)(e)]
- [OUT OF SCOPE]
- [R. Reg 10(4)(e)]

### **Background – REMA and zonal pricing**

- [OUT OF SCOPE]

### **Zonal Pricing**

- [OUT OF SCOPE]
- For Scotland, evidence suggests zonal pricing could increase costs for those investing in renewables in Scotland, but that it could also lower electricity costs for Scotland's consumers.

- Many renewables developers and investors believe that zonal pricing could lead to an investment hiatus by increasing their risks and capital costs, and reducing revenues. Generators see twin risks, in the form of ‘price risk’ and ‘volume risk’ – i.e. the price they receive for their electricity, and the amount of it they can sell.
  - [R. Reg 10(4)(e)]
- [OUT OF SCOPE]
  - [R. Reg 10(4)(e)]

**Sensitivities**

- [R. Reg 10(4)(e)]

**Views on zonal pricing**

- Several letters with signatories including renewables developers (including Scottish Power and SSE), businesses and Unions have been sent to the Prime Minister, First Minister and Deputy First Minister calling on the UK Government to urgently rule out zonal pricing (see Annex E for most recent example).
- [OUT OF SCOPE]

**OUT OF SCOPE**

**ANNEX B**

**Attendee Information**

[OUT OF SCOPE]

<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE [R. Reg 10(5)(f)]</b>
<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE [R. Reg 10(5)(f)]</b>
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<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>

**ANNEX C**

**Zonal Pricing and REMA Top Lines**

**I recognise the trade-offs and complexities in the debate around zonal pricing, and the impacts it could have on all market participants – including renewables generators, hydrogen producers, suppliers and consumers.**

- The current GB wholesale electricity market is not fit for the delivery of our net zero ambitions, nor our aims to tackle fuel poverty.
- The UK Government’s decision must provide absolute clarity on the next steps for REMA – this is crucial to maintaining investor confidence.
- UK Government reforms should adhere to the two core principles of achieving net zero and ensuring a fair and just transition.
- Reforms delivered through REMA must reduce costs for Scottish consumers, to ensure our communities feel the benefit of the energy transition, while also protecting investment in our renewables industry.
- Mitigations for any negative impacts must be put in place by the UK Government and clearly signalled to the market at the same time as the decision is announced.
- We are engaging widely with stakeholders to understand the impacts that market reforms could have in Scotland, and will ensure the interests of these stakeholders are represented in our discussions with UK Government.

## **ANNEX E**

**[R. Reg 6(1)(b) LINK: [250221 - Joint letter on zonal pricing concerns.pdf](#)**

**[R. Reg 6(4)(d)]**

**Offshore Wind Policy - SR Briefing - Director - 17 January 2025**

**STEERING BRIEF FOR MEETING WITH SCOTTISH RENEWABLES, 17 JANUARY 2025**

**[OUT OF SCOPE]**

**Zonal Pricing Renewables Concerns**

- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- We have heard the concerns of the renewables industry in Scotland in relation to potential impacts and will take these into account alongside feedback from a range of other stakeholders.

**[OUT OF SCOPE]**

**ANNEX D**

**[R. Reg 6(1)(b) LINK: [Our Publications | Scottish Renewables](#)]**

**Ministerial Briefing - Minister for Climate Action - Ocean Winds - 23 April 2025**

Minister for Climate Action – Dr Alasdair Allan

Briefing for meeting with Ocean Winds on transmission charging and electricity market reform

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OUT OF SCOPE	OUT OF SCOPE
<b>Supporting official</b>	[R. Reg 11(2)]
OUT OF SCOPE	OUT OF SCOPE

**Annex A – Biographies and Background**

**Biography**

- [OUT OF SCOPE]
- [ R. Reg 10(5)(e)]

**[OUT OF SCOPE]**

**Annex C – Top Lines**

**[OUT OF SCOPE]**

**REVIEW OF ELECTRICITY MARKET ARRANGEMENTS (REMA)**

- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- That is why we commissioned independent research to inform our position on Locational Marginal Pricing. The study benefited from wide engagement across

industry, including Scottish Renewables who joined our expert panel. This research was published on 12 August 2024.

- We continue to engage widely with stakeholders to understand the impacts market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.

[OUT OF SCOPE]

## **OCEA - REMA - Briefing - Zonal vs National Pricing Market Evidence Review - 14 January 2025**

### **Purpose**

- The purpose of this note is to provide a synthesis of the key evidence on the potential costs and benefits of implementing a zonal pricing electricity market versus reforming the existing national electricity market.

### **Key Findings**

- REMA reform is complex. The available evidence around potential impacts should therefore be considered [R. Reg 10(4)(e)] and is highly dependent upon the modelling assumptions used.
- [R. Reg 10(4)(e)]
- [OUT OF SCOPE]

### **Background**

- There is a clear need for reform in the energy market, with the shift towards a decarbonised electricity system based on renewables resulting in inefficiencies and rising costs<sup>1</sup>, as demonstrated through rising constraint costs<sup>2</sup>.
- The UK Government's (UKG) Review of Electricity Market Arrangements (REMA) aims to assess the way wholesale electricity is traded, to ensure it is fit for purpose for maintaining energy security and affordability for consumers.
- One of the key options of reform being considered as a part of REMA is the option of whether to have a reformed national market or adopt a zonal pricing market.
  1. A reformed national market would involve no change to the current market structure and would instead focus on improving existing market arrangements.
  2. By contrast, a zonal pricing electricity market would split Great Britain into geographic regions, with each zone having its own electricity price reflecting local supply and demand<sup>3</sup>.
- A range of studies have been conducted to assess the potential costs, benefits, and opportunities associated with REMA. These studies mainly focused on the effect for Great Britain, so Scotland specific evidence is somewhat limited.
- Using these studies, the remainder of this note aims to provide a summary of the following 4 key questions:
  1. How could investment be impacted?

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<sup>1</sup> [Review of electricity market arrangements \(REMA\): second consultation - GOV.UK](#)

<sup>2</sup> [Review of electricity market arrangements \(REMA\): second consultation - GOV.UK](#) For example, constraint costs have increased substantially from £0.7 billion in 2018/19 to £1.8 billion in 2022/23. Consumers will ultimately pay the price for this [Constraint Breakdown Costs and Volume | National Energy System Operator](#)

- [R. Reg 10(4)(e)]

## 2. How could ScotWind be impacted?

[OUT OF SCOPE]

- It is important to note that most of the modelling was produced at a time when recent UK Government policies, including Clean Power 2030, and the Strategic Spatial Energy Plan (SSEP) were not in existence. Caution should therefore be exercised when interpreting key results of the evidence base.

### **How could investment be impacted?**

#### **Costs/Risks**

- [R. Reg 10(4)(e)]

#### **Benefits/Opportunities**

- [R. Reg 10(4)(e)]
- [R. Reg 10(4)(e)]
  
- [R. Reg 10(4)(e)]
- [R. Reg 10(4)(e)]
- [R. Reg 10(4)(e)]

### **How could ScotWind be impacted?**

#### **Costs/Risks**

- [R. Reg 10(4)(e)]

#### **Benefits/Opportunities**

- [R. Reg 10(4)(e)]

[OUT OF SCOPE]

## **Briefing - Cab Sec NZE - Meeting with Unite - 4 June 2025**

### **Cabinet Secretary for Net Zero & Energy – Gillian Martin Briefing – Meeting with Unite on industry concerns about energy jobs & skills**


<b>What</b>	A roundtable discussion with Unite the Union and renewables developers on key issues related to renewables investment, energy jobs growth, and skills.
<b>Where</b>	Scottish Parliament, TG.23
<b>When</b>	11:30-12:30, Wednesday, 4 June 2025
OUT OF SCOPE	• OUT OF SCOPE
OUT OF SCOPE	OUT OF SCOPE
OUT OF SCOPE	OUT OF SCOPE
<b>Supporting officials</b>	<ul style="list-style-type: none"><li>• Catriona Laing – Deputy Director, Just Transition (in-person)</li><li>• [R Reg 11(2)]</li></ul>
Briefing contents	OUT OF SCOPE Annex E: Zonal pricing (agenda item 4) OUT OF SCOPE
OUT OF SCOPE	OUT OF SCOPE
OUT OF SCOPE	OUT OF SCOPE





### **Agenda**

#### **1. OUT OF SCOPE**

#### **2. Zonal Pricing (Annex E)**

### **Attendees**

Joining in person:	
	<b>Derek Thomson – Unite, Scotland Regional Secretary</b> Derek Thomson leads Unite the Union in Scotland, and has recently engaged with the Scottish and UK Governments and campaigned on: the Grangemouth refinery closure; calls for investment in manufacturing to secure future jobs; and the need for significant growth in green jobs to match potential jobs losses in oil and gas.
	<b>[R. Reg 11(2)]</b>

	<p><b>Andy Sloan – Low Carbon, Project Development Director</b>          Andy has over 15 years experience of delivering offshore and onshore wind and other energy, developing a pipeline of future projects, and engaging with government on strategic issues impacting delivery of projects.</p>
	<p><b>Robin Winstanley – OnPath Energy, Sustainability and Environment Director</b>          Robin is responsible for OnPath's work with communities to deliver social, environmental, and economic value. OnPath is developing onshore wind, battery, solar and flexible generation projects across the UK.</p>
	<p><b>Rob Fryer – CWP Energy, Director of Civils and Business Development</b>          Rob has worked with CWP for 20 years, developing its renewables portfolio. He has also been involved in delivering over £10m of community funds, such as £1.3m to assist families in East Lothian and North Ayrshire.</p>
	<p><b>Claire Mack – Scottish Renewables, Chief Executive</b>          Claire has been Chief Executive of Scottish Renewables since October 2017. She is also a member of the Scottish Energy Advisory Board (SEAB), and co-chair of the Scottish Offshore Wind Energy Council (SOWEC).</p>
<p>Joining online:</p>	
<p><b>Jack Norquoy – Scottish Renewables, Director of Public Affairs and Communications</b></p>	
<p>[R. Reg 11(2)]</p>	
<p>[R. Reg 11(2)]</p>	
<p>[R. Reg 11(2)]</p>	

**OUT OF SCOPE**

**ANNEX E**

**Zonal Pricing**

**Lines:**

- We recognise the trade-offs and complexities in the debate around zonal pricing, and the significant impacts its introduction could have for all market participants.
- OUT OF SCOPE
- We have engaged widely with stakeholders to fully understand the impacts that market reforms could have in Scotland and will continue to ensure the interests of stakeholders are represented in discussions with UK Government.
- The forthcoming decision by UK Government must provide absolute clarity on the next steps – this is crucial to maintaining investor confidence.
- Mitigations for any potential negative impacts must be put in place by UK Government and clearly signalled to the market at the same time as the decision is announced this summer.

**Background:**

- [R. Reg 6(1)(b) LINK: [normal\\_67baea3f56be0.pdf](#) ]
- OUT OF SCOPE
- Evidence suggests zonal pricing could increase costs for renewables investors in Scotland, but that it could also lower electricity costs for Scotland's consumers.
- Many renewables developers and investors believe that zonal pricing could lead to an investment hiatus by increasing their risks and capital costs, and reducing revenues. Generators see twin risks, in the form of 'price risk' and 'volume risk' – i.e. the price they receive for their electricity, and the amount of it they can sell.
- R. Reg 10(4)(e)]
- OUT OF SCOPE
- However, the National Energy System Operator (NESO), and other stakeholders, believe that zonal pricing could help to inform investment and operational decisions to tackle network congestion and minimise costs to consumers.
- OUT OF SCOPE

**Cabinet - NZE - 20 May 2025 - Background Briefing**

**Cabinet Secretary for Net Zero and Energy**

**OUT OF SCOPE**

**Annex C**

**Electricity Market Reform: [OUT OF SCOPE]**

**[R. Reg 10(4)(e)]**

- **[R. Reg 10(4)(e)]**
- **OUT OF SCOPE**
- **OUT OF SCOPE**
- **[R. Reg 10(4)(e)]**

**OUT OF SCOPE**

## **Dr Allan meeting with Ocean Winds - April 23 - meeting minute**

### **Minute of meeting with representative from Ocean Winds**

Scottish Parliament, 0900-0930, 23 April 2025

#### **In attendance:**

Dr Alastair Allan MSP, Minister for Climate Action (AA)

Adam Morrison, UK Manager, Ocean Winds (AM)

[Reg 11(2)], Directorate for Energy and Climate Change [Reg 11(2)]

[Reg 11(2)], Offshore Wind Directorate [Reg 11(2)]

#### **Discussion**

[OUT OF SCOPE]

[Reg 10(5)(f)]

[Reg 11(2)]

Offshore Wind Directorate

23 April 2025

**SEAB – Sir Jim McDonald Briefing – February 2025**

**BRIEFING FOR SIR JIM MCDONALD  
SCOTTISH ENERGY ADVISORY BOARD  
4 FEBRUARY 2025, 12:00-14:00**

[OUT OF SCOPE]

**CHAIRS' STEERING BRIEF**

<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>1. OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	
<b>2. OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	
<b>3. OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	
<b>4. OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	
<b>4. OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	
<b>Purpose:</b> Scottish Government to hear stakeholders' views on the risks and opportunities of market reforms for locational pricing, in relation to SG's priority of the reforms maintaining Scotland as an attractive place to invest, whilst providing an opportunity to reduce costs for consumers.	
<b>OUT OF SCOPE</b>	
<ul style="list-style-type: none"><li>• Implications for Scotland (e.g. impact on revenue, risk and investor confidence for renewables; potential to reduce wholesale electricity costs with associated benefits for consumers and reducing the cost of decarbonisation).</li></ul>	
<b>Sir Jim</b> to then invite members to an open discussion – focusing the discussion on these three strategic questions:	

<ul style="list-style-type: none"> <li>• How much would zonal approach impact investment?</li> <li>• OUT OF SCOPE</li> </ul>	
<b>OUT OF SCOPE</b>	
5. <b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	

[OUT OF SCOPE]

- Zonal pricing would redesign the wholesale electricity market so that prices are set based on supply and demand in a particular node or region. The introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- OUT OF SCOPE
- The Scottish Government continues to engage widely with stakeholders to understand the impacts that market reforms could have in Scotland.

[OUT OF SCOPE]

## SEAB Briefing - Cab Sec NZE - 4 Feb 2025

Acting Cabinet Secretary for Net Zero and Energy – Gillian Martin  
Briefing for Scottish Energy Advisory Board, 12:00-14:00 on 4 February

OUT OF SCOPE

### FULL AGENDA WITH SPEAKING NOTES

OUT OF SCOPE	OUT OF SCOPE
5. Review of Electricity Markets Arrangements (REMA)	13:25
<b>OUT OF SCOPE</b> <b>Purpose:</b> Scottish Government to hear stakeholders' views on the risks and opportunities of market reforms for locational pricing, in relation to SG's priority of the reforms maintaining Scotland as an attractive place to invest, whilst providing an opportunity to reduce costs for consumers. <b>OUT OF SCOPE</b> <ul style="list-style-type: none"><li><b>OUT OF SCOPE</b></li><li>Implications for Scotland (e.g. impact on revenue, risk and investor confidence for renewables; potential to reduce wholesale electricity costs with associated benefits for consumers and reducing the cost of decarbonisation)</li></ul> <b>Sir Jim</b> to invite members to an open discussion – focusing the discussion on these three strategic questions: <ul style="list-style-type: none"><li>How much would a zonal approach impact investment?</li><li>OUT OF SCOPE</li><li>For each of the approaches, what elements present the biggest risk to members and how can these be mitigated?</li></ul> <b>OUT OF SCOPE</b>	
6. AOB & Close	13:55
OUT OF SCOPE	

OUT OF SCOPE

ANNEX G

### Review of Electricity Market Arrangements (REMA)

#### TOP LINES

- OUT OF SCOPE
- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.

- We continue to engage widely with stakeholders to understand the impacts market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.
- OUT OF SCOPE
  - OUT OF SCOPE

### **Sensitivities**

- [R. Reg 10(4)(e)]
- The renewables industry – including SSE and Scottish Renewables – has expressed strong opposition to zonal pricing calling for a reformed national market to be prioritised as they believe that zonal pricing could lead to an investment hiatus by increasing risk and capital costs, and reducing revenues.
- NESO has expressed support for a zonal approach as “the best way of mitigating the risks and maximising the opportunities of a decarbonised power sector”.
- OUT OF SCOPE

**SEAB – FM Briefing – 4 February 2025**

**BRIEFING FOR THE FIRST MINISTER**

**SCOTTISH ENERGY ADVISORY BOARD**

**4 FEBRUARY 2025, 12:00-14:00**

**OUT OF SCOPE**

**CHAIRS’ STEERING BRIEF**

OUT OF SCOPE	OUT OF SCOPE
<b>OUT OF SCOPE</b>	
<p><b>Purpose:</b> Scottish Government to hear stakeholders’ views on the risks and opportunities of market reforms for locational pricing, in relation to SG’s priority of the reforms maintaining Scotland as an attractive place to invest, whilst providing an opportunity to reduce costs for consumers.</p>	
<b>OUT OF SCOPE</b>	
<ul style="list-style-type: none"><li>• <b>OUT OF SCOPE</b></li><li>• Implications for Scotland (e.g. impact on revenue, risk and investor confidence for renewables; potential to reduce wholesale electricity costs with associated benefits for consumers and reducing the cost of decarbonisation).</li></ul>	
<p><b>Sir Jim</b> to invite members to an open discussion – focusing the discussion on these three strategic questions</p>	
<ul style="list-style-type: none"><li>• How much would zonal approach impact investment?</li><li>• OUT OF SCOPE</li><li>• For each of the approaches, what elements present the biggest risk to members and how can these be mitigated?</li></ul>	
<b>OUT OF SCOPE</b>	
7. OUT OF SCOPE	OUT OF SCOPE

**REVIEW OF ELECTRICITY MARKET ARRANGEMENTS (REMA)**

**Background:** OUT OF SCOPE [R. Reg 10(4)(e)] The renewables industry – including SSE and Scottish Renewables – has expressed strong opposition to zonal pricing, whilst NESO has expressed support.

### **OUT OF SCOPE**

- OUT OF SCOPE
- Reforms must deliver reduced costs for Scottish consumers, to ensure our communities feel the benefit of the energy transition, while also protecting investment in our renewables industry.
- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- We continue to engage widely with stakeholders to understand the impacts market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.

OUT OF SCOPE

## Offshore Wind Policy - SR Briefing - Director - 05 March 2025

### **STEERING BRIEF FOR MEETING WITH SCOTTISH RENEWABLES, 05 March 2025**

1. REMA (inc zonal)
2. OUT OF SCOPE  
[OUT OF SCOPE]

#### Points to make

- OUT OF SCOPE
- We understand UKG are still considering both zonal and reformed national market options and will press them to ensure that a decision does not slip beyond their summer 2025 deadline. We recognise the importance of clarity as soon as possible for AR7 and future CfD auction rounds.
- We encourage SR to continue to engage directly with UKG ahead of their Ministers taking final decisions in the coming months.

#### Lines to take

- OUT OF SCOPE
- Reforms must deliver reduced costs for Scottish consumers, to ensure our communities feel the benefit of the energy transition, while also protecting investment in our renewables industry.
- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- Mitigations for any potential negative impacts must be put in place and clearly signalled to the market at the same time as the decision is announced.
- We continue to engage widely with stakeholders to understand the impacts market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UKG.
- OUT OF SCOPE

#### To note

- Ragne Low, Laura Murdoch,[R. Reg 11(2)] and Catherine Williams met with SR [R. Reg 10(5)(f)] on 3 March 2025. REMA was raised and points discussed above were reiterated.
- On 21 February, an open letter signed by 55 energy companies was sent to the UKG asking for zonal electricity pricing to be ruled out at the earliest opportunity. This was followed by a similar letter on 23 February signed by industry companies and trade unions. Both letters can be found at Annex E.

## **ANNEX E**

### **Letters from industry re zonal pricing**

[R. Reg 6(1)(b) Link: [250221 - Joint letter on zonal pricing concerns 1.pdf](#)]

[R. Reg 6(1)(b) Link: [normal\\_67baea3f56be0.pdf](#)]

**Briefing - Official Opening of SSE Renewables new Onshore Control Centre - 17 January 2025 KD**

**BRIEFING FOR THE FIRST MINISTER**

**Official Opening of SSE Renewables new Onshore Control Centre (Perth)  
17 January 2025**

<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>Likely themes</b>	<ul style="list-style-type: none"><li>• OUT OF SCOPE</li><li>• [R. Reg 10(5)(E)]</li></ul>
<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>

**Sensitivities**

- OUT OF SCOPE
- [R. Reg 10(5)(E)]
- OUT OF SCOPE

**Locational Pricing**

- We are aware that the introduction of zonal pricing through REMA could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- That is why we commissioned independent research to inform our position on locational pricing. The study benefited from wide engagement across industry, including Scottish Renewables who joined our expert panel. This research was published on 12 August 2024.
- We welcomed the UK Government's recent REMA update which included the timetable for decision making. However, it is crucial the UK Government now takes

a decision on zonal pricing and a reformed Contracts for Difference scheme quickly to maintain investor confidence.

- We continue to engage widely with stakeholders to understand the impacts market reforms could have in Scotland. In December 2024, Scottish Government participated in the first Electricity Markets Forum hosted by University of Edinburgh, ClimateXChange and the Royal Society of Edinburgh.

## **OUT OF SCOPE**

**OSW - Briefing - Minister for Climate Action - Scottish Offshore Wind Energy Council (SOWEC) Parliamentary Reception - 25 March 2025**

Minister for Climate Action – Dr Alasdair Allan

**Briefing for SOWEC Parliamentary Reception 25 March 2025**

[R. Reg 10(4)(E)] **REMA/zonal pricing:**

*Lines to take if raised:*

**OUT OF SCOPE**

- I recognise the trade-offs and complexities in the debate on zonal pricing.
- I look forward to the UK Government announcing its final decision on wholesale electricity market reform this summer – this is crucial to maintaining investor confidence.
- Reforms must deliver reduced costs for Scottish consumers, to ensure our communities feel the benefit of the energy transition, while also protecting investment in our renewables industry.
- Mitigations for any potential negative impacts must be put in place and clearly signalled to the market.
- We will continue to engage widely with stakeholders to consider their views in light of emerging evidence and policy developments, and to ensure these views are represented in our discussions with the UK Government.

OUT OF SCOPE

**Review of Electricity Market Arrangements (REMA)**

- OUT OF SCOPE
- We look forward to the UK Government announcing its final decision on the REMA this summer. This decision must provide absolute clarity on the next steps for REMA – this is crucial to maintaining investor confidence.
- OUT OF SCOPE
- We recognise the trade-offs and complexities in the debate around zonal pricing and are aware that its introduction could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- Mitigations for any potential negative impacts must be put in place by UK Government and clearly signalled to the market at the same time as the decision is announced this summer.

## **WindEurope - 8 to 10 April 2025 - Offshore Wind additional top lines**

### **VISIT TO DENMARK, 8 – 10 APRIL 2025 ADDITIONAL TOP LINES BRIEFING**

#### **OUT OF SCOPE**

#### **ANNEX F**

#### **OUT OF SCOPE**

- The CfD reforms cannot be considered in isolation and must take into account wider reforms currently underway (REMA/TNOUS/zonal pricing) to understand the cumulative impact of these on the development and deployment of offshore wind projects in Scotland.

#### **OUT OF SCOPE**

### **REVIEW OF ELECTRICITY MARKET ARRANGEMENTS (REMA)**

#### **OUT OF SCOPE**

- Reforms must deliver reduced costs for Scottish consumers, to ensure our communities feel the benefit of the energy transition, while also protecting investment in our renewables industry.
- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.

### **We continue to engage widely with stakeholders to understand the full impacts market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.**

- OUT OF SCOPE
- Reforms delivered through REMA must reduce costs for Scottish consumers, ensure our communities feel the benefit of the energy transition and protect investment in our renewables industry.
- We recognise the trade-offs and complexities in the debate around zonal pricing and are aware that its introduction could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- Mitigations for any potential negative impacts must be put in place by UK Government and clearly signalled to the market at the same time as the decision is announced this summer.

#### **OUT OF SCOPE**

**GOSWIF - Cabinet Secretary Briefing - Monday 17 March 2025 - Castle Dinner final copy**

**BRIEFING FOR THE CABINET SECRETARY FOR NET ZERO AND ENERGY**

**GLOBAL OFFSHORE WIND INVESTMENT FORUM – CASTLE DINNER**

**Monday 17 March 2025**

[OUT OF SCOPE]

**ANNEX C**

**[R. REG 10(5)(F)]**

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**Octopus  
[R. Reg 10(5)(f)]**

<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	<ul style="list-style-type: none"><li>• <b>OUT OF SCOPE</b></li></ul>
<b>OUT OF SCOPE</b>	<b>OUT OF SCOPE</b>
<b>OUT OF SCOPE</b>	<ul style="list-style-type: none"><li>• <b>OUT OF SCOPE</b></li></ul>
<b>SG Engagement</b>	<ul style="list-style-type: none"><li>• <b>14 Oct 2024</b> – FM met with CEO of Octopus at the UK Investment Summit to discuss opportunities within Scotland.</li><li>• Cab Sec NZE, Gillian Martin met with Greg Jackson, CEO and Rachel Fletcher, Director for regulation and Economics at Octopus Energy to discuss the company’s views on location pricing. This was an opportunity for engagement to understand their views on the potential impacts of zonal pricing for Scotland.</li></ul>
<b>OUT OF SCOPE</b>	<ul style="list-style-type: none"><li>• <b>OUT OF SCOPE</b></li></ul>
<b>Sensitivities</b>	<ul style="list-style-type: none"><li>• <b>OUT OF SCOPE</b></li><li>• We are aware that the introduction of zonal pricing could have significant impacts for all market participants. That is why we commissioned independent research to inform our position on LMP. This research was published in August 2024.</li><li>• <b>OUT OF SCOPE</b></li></ul>

OUT OF SCOPE

**Briefing - Minister for Climate Action - Parliamentary debate on net zero on 22 January 2025**

[OUT OF SCOPE]

**ANNEX C**

[OUT OF SCOPE]

**[Reg 10(4)(e)]**

[OUT OF SCOPE]

**[Reg 10(4)(e)]**

**Deputy first Minister Meeting with West of Orkney Wind Farm – Briefing Pack –  
05 February 2025**

**OUT OF SCOPE**

**Annex E**

**Additional Briefing / Lines to take**

- **OUT OF SCOPE**
- We are aware that zonal pricing could have significant impacts for market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- We continue to engage widely with stakeholders to understand the impacts market reforms could have in Scotland. We will ensure the interests of these stakeholders are represented in our discussions with UK Government.

**OUT OF SCOPE**

**Michelle Quinn, Director Of Offshore Wind – Briefing – Visit To Denmark**  
**06 - 10 April 2025**

[OUT OF SCOPE]

**Key issues for renewables deployment in Scotland:**

- OUT OF SCOPE
- On potential electricity market reforms, our engagements with the UK government are focused on the need to deliver reduced costs for Scottish consumers, while also protecting investment in our renewables industry.
- We are working closely with UK Government to ensure the needs of Scotland's renewables industry is reflected in any reforms in these areas.
- OUT OF SCOPE

**Topic 2 – CfD Reform and AR7**

- OUT OF SCOPE
- We cannot consider the impact of the CfD reforms on the development and deployment of Scotland's offshore wind projects, without also considering:
  - OUT OF SCOPE
  - the uncertainty created with the potential implementation of zonal pricing.
- OUT OF SCOPE

**Review of Electricity Market Arrangements (REMA)**

- We recognise the trade-offs and complexities in the debate around zonal pricing and are aware that its introduction could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- OUT OF SCOPE
- We look forward to the UK Government announcing its final decision on the Review of Electricity Market Arrangements (REMA) this summer. This decision must provide absolute clarity on the next steps for REMA – this is crucial to maintaining investor confidence.
- OUT OF SCOPE
- Reforms delivered through REMA must reduce costs for Scottish consumers, ensure our communities feel the benefit of the energy transition and protect investment in our renewables industry.
- Mitigations for any potential negative impacts must be put in place by UK Government and clearly signalled to the market at the same time as the decision is announced this summer.
- We have engaged widely with stakeholders to understand the impacts that market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.

**Background: REMA Decision Timeline**

- OUT OF SCOPE
- On 14 March, a collection of offshore wind developers, supported by Scottish Renewables and Prosper, wrote to the Prime Minister and First Minister, asking that zonal pricing be urgently ruled out.

**Kate Forbes, Deputy First Minister And Cabinet Secretary For Economy And Gaelic – Briefing for meeting with West of Orkney Offshore Wind Farm**

**OUT OF SCOPE**

**BACKGROUND**

1. OUT OF SCOPE
2. On 14 March 2025, Scottish Renewables and Prosper wrote to the Prime Minister and First Minister warning that proposed zonal pricing reforms risk undermining Scotland's offshore wind pipeline, stalling investment, and threatening jobs, and urged the UK Government to rule out the policy to protect energy security and consumer benefits. A copy of this letter is included in Annex E.
3. [R. Reg (10(5)(f))]
4. OUT OF SCOPE

**KEY CONCERNS**

5. **OUT OF SCOPE**
6. **UKG Reforms – Zonal Pricing and TNUoS:** The offshore wind industry has set out their very strong view that any decision to move towards zonal pricing as part of REMA would introduce widespread risk and uncertainty which would hinder, or even potentially halt, investment in offshore wind farms in Scotland. OUT OF SCOPE

**ANNEX C**

**Review of Electricity Market Arrangements (REMA) and zonal pricing**

- I recognise the debate around REMA, and zonal pricing in particular, is complex, and that its introduction could have significant impacts for all market participants.
- The concerns of offshore wind developers, investors and supply chain on zonal pricing in particular are well understood. I believe you were recently at a Prosper roundtable with the acting Cabinet Secretary for Net Zero and Energy where these points were reiterated. I also understand you have had similar engagement with the UK Government who of course will be taking the decision.
- To ensure all stakeholders' interests are represented – including consumers - SG has, and continues to, engage widely to understand the impacts market reforms could have in Scotland.
- Following a decision, we are clear that the UK Government must provide clarity on next steps for investors and developers alike, and put mitigations in place for any negative impacts of the reforms.

**ZONAL PRICING**

- Zonal pricing would redesign the wholesale electricity market so that prices are set based on supply and demand in a particular region.

- Modelling and assessments by UKG and industry show a range of outcomes, from a net disbenefit to UK consumers to a net benefit.
- Many renewables developers and investors are of the strong view that zonal pricing could lead to an investment hiatus by increasing their risks and capital costs, and reducing revenues.
- UKG and NESO are exploring how any potential cost of capital increase could be negated, such as through use of financial instruments.
- [R. Reg 10(4)(E)]

## ANNEX E

[R. Reg 6)(1)(b) Link: [Letter to the UK and Scottish Governments - Review of Electricity Market Arrangements Concerns from Scottish Offshore Wind Industry 14.03.25 original.pdf](#)]

## **Top Lines Briefing – Director General Net Zero – Uk Offshore Wind Supply Chain Spotlight / Offshore Wind Conference – 10 & 12 December 2024**

OUT OF SCOPE

### **REVIEW OF ELECTRICITY MARKET ARRANGEMENTS (REMA)**

- OUT OF SCOPE
- Crucially, this must be balanced with the vital need to ensure that levels of investment in renewables, flexibility and networks are protected and enhanced, so we maximise the economic opportunities afforded by the net zero energy transition.
- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- That is why we commissioned independent research to inform our position on Locational Marginal Pricing. The study benefited from wide engagement across industry, including Scottish Renewables who joined our expert panel. This research was published on 12 August 2024.
- We continue to engage widely with stakeholders to further understand the impacts market reforms could have in Scotland.
- We welcome the constructive engagement we have had with Ofgem, NESO, UK Government and industry on REMA. We look forward to this continuing as the UK Government progresses its programme of market reforms.
- We believe the UK Government must urgently provide a public signal on the timetable and direction of travel for key reforms; this is crucial to maintaining investor confidence. OUT OF SCOPE

### **Specific Lines for Renewables Concerns**

- The Scottish Government is aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers. We have heard the concerns of the renewables industry in Scotland in relation to potential impacts of zonal pricing and will take these into account alongside feedback from a range of other stakeholders.

OUT OF SCOPE

**DEPUTY FIRST MINISTER AND CABINET SECRETARY FOR ECONOMY AND  
GAELIC – Briefing For Meeting With Enbw**

**OUT OF SCOPE**

**Annex D**

**Discussion points, lines to take and background**

**Suggested discussion points**

- OUT OF SCOPE
- You will have seen that the UKG is currently considering reforms to the electricity market which may result in a switch to zonal pricing. What is your view on this and its impact on offshore wind projects?

**OUT OF SCOPE**

**Reform of Electricity Market Arrangements (REMA) and proposals for zonal pricing** – Lines to take

- OUT OF SCOPE
- We look forward to the UK Government announcing its final decision on wholesale electricity market reform this summer - this is crucial to maintain investor confidence.
- OUT OF SCOPE
- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- Mitigations for any potential negative impacts must be put in place and clearly signaled to the market at the same time as the decision is announced.
- We continue to engage widely with stakeholders to understand the impacts market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.
- OUT OF SCOPE

**OUT OF SCOPE**

## **Visit To Denmark, 8 – 10 April 2025 – Additional Top Lines Briefing**

### **OUT OF SCOPE**

### **ANNEX F**

#### **OUT OF SCOPE**

- The CfD reforms cannot be considered in isolation and must take into account wider reforms currently underway (REMA/TNOUS/zonal pricing) to understand the cumulative impact of these on the development and deployment of offshore wind projects in Scotland.

### **OUT OF SCOPE**

## **REVIEW OF ELECTRICITY MARKET ARRANGEMENTS (REMA)**

### **OUT OF SCOPE**

- Reforms must deliver reduced costs for Scottish consumers, to ensure our communities feel the benefit of the energy transition, while also protecting investment in our renewables industry.
- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.

### **We continue to engage widely with stakeholders to understand the full impacts market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.**

- OUT OF SCOPE
- Reforms delivered through REMA must reduce costs for Scottish consumers, ensure our communities feel the benefit of the energy transition and protect investment in our renewables industry.
- We recognise the trade-offs and complexities in the debate around zonal pricing and are aware that its introduction could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- Mitigations for any potential negative impacts must be put in place by UK Government and clearly signalled to the market at the same time as the decision is announced this summer.

### **OUT OF SCOPE**

**Briefing For The First Minister – Offshore Wind Investment Dinner**  
**18 February 2025**

OUT OF SCOPE

**REVIEW OF ELECTRICITY MARKET ARRANGEMENTS (REMA)**

- We are aware that the introduction of zonal pricing could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.

OUT OF SCOPE

**Briefing for Global Offshore Wind – London – 18 June 2025**

Cabinet Secretary for Climate Action and Energy - Gillian Martin

<b>What</b>	RenewableUK's Global Offshore Wind Conference
<b>OUT OF SCOPE</b>	OUT OF SCOPE

**REVIEW OF ELECTRICITY MARKET ARRANGEMENTS (REMA)**

**The Scottish Government is clear that the current wholesale electricity market is not fit for the delivery of our net zero ambitions, nor our aims to tackle fuel poverty.**

- Reforms must deliver reduced costs for Scottish consumers, to ensure our communities feel the benefit of the energy transition, while also protecting investment in our renewables industry.
- We recognise the trade-offs and complexities in the debate around zonal pricing and are aware that its introduction could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- Mitigations for any potential negative impacts must be put in place by UK Government and clearly signalled to the market at the same time as the decision is announced this summer.

OUT OF SCOPE

**FM briefing – SSE Training Centre Visit – 9 May 2025**

**BRIEFING FOR THE FIRST MINISTER**

**SSE Faskally Safety Leadership Centre**

**9/05/2025**

OUT OF SCOPE

**Sensitivities**

OUT OF SCOPE

- [R. Reg 10(5)(e)]

OUT OF SCOPE

OUT OF SCOPE

**EMAILS – EIR 202500470399**

RE: POLICY VIEWS PLEASE: Letter to First Minister about wind farm developments  
Fri 30/05/2025 15:20

From : [R. Reg 11(2)] TO: [R. Reg 11(2)] Catherine Williams [R. Reg 11(2)] Laura  
Murdoch [R. Reg 11(2)] Catriona Laing [R. Reg 11(2)] Ragne Low [R. Reg 11(2)]  
Catherine Kelham [R. Reg 11(2)]

CC: [R. Reg 11(2)], Communications Net Zero, Energy and Rural Affairs  
<CommunicationsNetZero&RuralAffairs@gov.scot>; [R. Reg 11(2)] Communications  
First Minister CommunicationsFirstMinister@gov.scot

[OUT OF SCOPE]

Suggested response:

[OUT OF SCOPE]

[R. Reg 10(4)(d)]

--

[R. Reg 11(2)]  
Senior Media Manager  
Scottish Government  
[R. Reg 11(2)]

[OUT OF SCOPE]

From: [R. Reg 11(2)]  
Sent: 30 May 2025 12:16  
To: [R. Reg 11(2)] Laura Murdoch [R. Reg 11(2)] Catriona Laing [R. Reg 11(2)]  
Catherine Williams [R. Reg 11(2)] Ragne Low [R. Reg 11(2)]  
Cc: Communications Net Zero, Energy and Rural Affairs  
<CommunicationsNetZero&RuralAffairs@gov.scot>; [R. Reg 11(2)] Communications  
First Minister <CommunicationsFirstMinister@gov.scot>  
Subject: POLICY VIEWS PLEASE: Letter to First Minister about wind farm  
developments

[OUT OF SCOPE]

[R. Reg 10(4)(d)]

--

[R. Reg 11(2)] | Communications: News (Net Zero and Energy)  
Senior Media Manager  
Scottish Government  
[R. Reg 11(2)]

RE: Lines on [Reg 10(5)(f)] Windfarm Projects - Briefing for Cab Sec NZE meeting  
with Seamus Logan MP

Tue 18/03/2025 13:58

From : [R. Reg 11(2)]

To: [R. Reg 11(2)]

[OUT OF SCOPE] [Reg R. 10(4)(e)]

- [OUT OF SCOPE]

Review of Electricity Market Arrangements (REMA)

- [OUT OF SCOPE]
- Reforms delivered through REMA must reduce costs for Scottish consumers, ensure our communities feel the benefit of the energy transition and protect investment in our renewables industry.
- We recognise the trade-offs and complexities in the debate around zonal pricing and are aware that its introduction could have significant impacts for all market participants, from renewable generators and hydrogen producers to suppliers and consumers.
- Mitigations for any potential negative impacts must be put in place by UK Government and clearly signalled to the market at the same time as the decision is announced this summer.
- We have engaged widely with stakeholders to understand the impacts that market reforms could have in Scotland and will ensure the interests of these stakeholders are represented in our discussions with UK Government.

[OUT OF SCOPE]

[R. Reg 10(4)(e)]

From: Ragne Low [R. Reg 11(2)]

To: Deputy First Minister and Cabinet Secretary for Economy & Gaelic [R. Reg 11(2)]; Cabinet Secretary for Climate Action and Energy [R. Reg 11(2)]; Minister for Climate Action [R. Reg 11(2)]

CC: Director of Offshore Wind [R. Reg 11(2)]; [R. Reg 11(2)] Berge [R. Reg 11(2)] Catherine Williams [R. Reg 11(2)] Laura Murdoch [R. Reg 11(2)] Susie Townend [R. Reg 11(2)] Lucy Law [R. Reg 11(2)] DG Net Zero

Dear DFM/PO, CSNZE/PO and MfCA/PO

[OUT OF SCOPE]

[R. Reg 10(5)(e)] [OUT OF SCOPE]. [R. Reg 10(5)(e)] [OUT OF SCOPE]

[OUT OF SCOPE]

Ragne

**Deputy Director, Offshore Wind Programme and Investment**  
**Offshore Wind Directorate | Scottish Government**  
5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU  
[R. Reg 11(2)]

[OUT OF SCOPE]

**From:** [R. Reg 11(2)]  
**Sent:** 08 January 2025 15:37  
**To:** [R. Reg 11(2)]  
**Subject:** Hello - and locational pricing

Hi [R. Reg 11(2)]

[OUT OF SCOPE]

We understand the risks as set out by stakeholders particularly in the renewables industry. [OUT OF SCOPE]

[OUT OF SCOPE] The counter argument is that this could impact on revenues in the renewables industry; investors are concerned that cost of capital will increase and they say this would raise the overall cost to consumers of delivering net zero and make Scotland a less attractive place to invest in renewables. [OUT OF SCOPE]

[OUT OF SCOPE]

Best wishes,  
[R. Reg 11(2)]

[R. Reg 11(2)] Energy Strategy and Markets Unit  
Onshore Electricity, Strategy and Consents | Directorate of Energy and Climate Change | Scottish Government  
5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU  
e: [R. Reg 11(2)]

[OUT OF SCOPE]

**From:** [R. Reg 11(2)]  
**Sent:** 24 March 2025 17:11  
**To:** Gary Gillespie [R. Reg 11(2)]  
**Cc:** [R. Reg 11(2)]  
**Subject:** RE: Submission - REMA and Wider Policy Levers for Reducing Electricity Costs - Follow up to Deep Dive - 24 March 2025

Hi [R. Reg 11(2)] – [OUT OF SCOPE] [R. Reg 10(4)(e)] [OUT OF SCOPE]

[R. Reg 10(4)(e)]  
[OUT OF SCOPE]

[R. Reg 11(2)]

**From:** Gary Gillespie  
**Sent:** 24 March 2025 16:19  
**To:** [R. Reg 11(2)]  
**Subject:** FW: Submission - REMA and Wider Policy Levers for Reducing Electricity Costs - Follow up to Deep Dive - 24 March 2025

[OUT OF SCOPE] [R. Reg 10(4)(e)]

Gary Gillespie  
*Chief Economist*  
*Scottish Government*  
Tel: [R. Reg 11(2)]



**From:** [R. Reg 11(2)]  
**Sent:** 24 March 2025 14:09  
**To:** Cabinet Secretary for Net Zero and Energy [R. Reg 11(2)]  
**Cc:** Deputy First Minister and Cabinet Secretary for Economy & Gaelic [R. Reg 11(2)]>; Cabinet Secretary for Transport [R. Reg 11(2)]  
Cabinet Secretary for Rural Affairs, Land Reform & Islands 2024 [R. Reg 11(2)]  
>; Minister for Climate Action [R. Reg 11(2)]  
Minister for Business [R. Reg 11(2)] DG Net Zero [R. Reg 11(2)] DG Economy [R. Reg 11(2)]  
Director of Offshore Wind [R. Reg 11(2)] Kersti Berge [R. Reg 11(2)] Colin Cook [R. Reg 11(2)]  
Catherine Williams [R. Reg 11(2)] Ragne Low [R. Reg 11(2)] Laura Murdoch [R. Reg 11(2)]  
>; Philip Raines [R. Reg 11(2)]  
Sue Kearns [R. Reg 11(2)] Annabel Turpie [R. Reg 11(2)] Morna Cannon [R. Reg 11(2)]  
Susie Townend [R. Reg 11(2)] David Hutchison [R. Reg 11(2)]; Colin McAllister [R. Reg 11(2)];  
Emily Mackintosh [R. Reg 11(2)]; [R. Reg 11(2)] Communications Net Zero, Energy and Rural Affairs [R. Reg 11(2)]; Marcus McPhillips [R. Reg 11(2)]  
**Subject:** Submission - REMA and Wider Policy Levers for Reducing Electricity Costs - Follow up to Deep Dive - 24 March 2025

[OUT OF SCOPE]

- Note the advice provided in this submission [OUT OF SCOPE] and in Annex B on the potential impact of zonal pricing on industry profits and investment;

[OUT OF SCOPE]

Kind Regards,

[R. Reg 11(2)]

Energy Strategy and Markets Unit | Onshore Electricity, Strategy and Consents  
Directorate of Energy and Climate Change | Scottish Government  
5 Atlantic Quay, Glasgow, G2 8LU | [R. Reg 11(2)]



RE: URGENT: First Minister Visit to SSE Renewables onshore control centre  
Thu 30/01/2025 09:18

From: [R. Reg 11(2)] on behalf of; First Minister [R. Reg 11(2)]  
To: [R. Reg 11(2)] First Minister  
Cc: [R. Reg 11(2)] Christopher Mackie [R. Reg 11(2)]; [R. Reg 11(2)] Emily Mackintosh [R. Reg 11(2)]

[R. Reg 11(2)]

- [OUT OF SCOPE]
- [R. Reg 10(5)(f)] reflected on the renewables industry in Scotland is facing some of the strongest headwinds it has faced in years with cost of capital is increasing, as well as supply chain costs. [R. Reg 10(5)(F)] Highlighted specific concerns over Zonal pricing, noting it will have a material impact on the scale of investment in Scotland [R. Reg 10(5)(f)] impacting jobs and the supply chain. [R. Reg 10(5)(f)]
- [OUT OF SCOPE]

Many thanks,  
[R. Reg 11(2)]

[R. Reg 11(2)]  
**Deputy Private Secretary**  
**Office of the First Minister**  
[OUT OF SCOPE]

**From:** [R. Reg 11(2)]  
**Sent:** 22 April 2025 14:56  
**To:** [R. Reg 11(2)]  
**Cc:** [R. Reg 11(2)]  
**Subject:** RE: FM Zonal Pricing Meeting - Lines for Kersti Berge meeting with Consumer Scotland

Hi [R. Reg 11(2)]

[OUT OF SCOPE]

**FM Zonal Pricing Roundtable – summary of key points:**

- The FM chaired a discussion on zonal pricing with representatives from Scottish Power, SSE, Scottish Enterprise, Consumer Scotland, and the Energy Consumers Commission.
- The roundtable discussion indicated that the potential risks from zonal pricing to both renewables and grid investment are significant for Scotland.
- [OUT OF SCOPE]
- [R. Reg 10(4)(e)]. [OUT OF SCOPE]

[R. Reg 11(2)]

**[OUT OF SCOPE]**

RE: Briefing: Scottish Power/Scottish Government Meeting - Tuesday 3 June

Tue 03/06/2025 11:00

From: Catherine Williams R. Reg 11(2)]

To: Kersti Berge R. Reg 11(2)]Ragne Low R. Reg 11(2)]

Catriona Laing R. Reg 11(2)]

Cc. Reg 11(2)]

Hi – few bullets below:

- [OUT OF SCOPE]

**(6) Zonal pricing**

- FM and Ministers have heard from all sides of the debate – FM met with SP following SEAB as part of smaller roundtable.
- Cab Sec met with Prosper recently- including Scottish Power
- She recognised the concerns of industry and the impact this could have on the renewables industry
- [OUT OF SCOPE]

Thanks

Catherine

**[OUT OF SCOPE]**

**From:** R. Reg 11(2)]

**Sent:** 09 June 2025 18:55

**To:** Deputy First Minister and Cabinet Secretary for Economy & Gaelic

**Cc:** DG Economy ; Richard Rollison ; R. Reg 11(2)]

**Subject:** FW: Cabinet Tomorrow - Response to UK Government on Review of Electricity Market Arrangements: Civic Pricing

DFMPO,

[R. Reg 10(4)(e)]

R. Reg 11(2)]

- Regarding the UK Government Review of Electricity Market Arrangements [OUT OF SCOPE]
- There has been extensive commentary on the potential negative investment impact that Zonal Pricing could have on renewable energy projects in Scotland – this was raised by many stakeholders at GOSWIF. [R. Reg 10(4)(e)]
- [OUT OF SCOPE]
- [R. Reg 10(4)(e)].
- [OUT OF SCOPE]