**C12.3a** On what issues have you been engaging directly with policy makers?

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<tr>
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<tbody>
<tr>
<td>Other, please specify (Climate ambition)</td>
<td>Support</td>
<td>SSE strongly supports the UK’s commitment to reaching net zero by 2050 and sees COP26 as a pivotal moment for the UK to demonstrate leadership on climate action. SSE is proud to be working with the UK Government as a Principal Partner of COP26 in Glasgow. SSE announced this partnership in November 2020 as the aims of this major international climate event align perfectly with our Group strategy. SSE has led calls for the governments in which it has a presence to build back better and greener from Coronavirus. SSE published <em>A Greenprint for a Cleaner, Resilient Economy</em> in May 2020 and <em>A Greenprint for Economic Recovery: Five priorities for Ireland’s energy future</em> in July 2020. The contents of these position papers have formed the basis of SSE’s engagement with policy makers throughout 2020/21. SSE hosted the Prime Minister of the United Kingdom, Boris Johnson, at the wind turbine testing facility for Dogger Bank in December 2020, during which SSE’s Chief Executive engaged directly with the Prime Minister and his team on how SSE can support the UK in reaching climate targets. SSE also hosted virtual roundtable discussions with policymakers during which outlined SSE’s ambitions for COP26. This involved representation from the Secretary of State for BEIS, Scottish Cabinet Secretary for Climate Change, Members of the UK Parliament, Scottish Parliament, and Council Leaders representing a range of political parties.</td>
<td>SSE is supportive of the UK Government’s commitment to reaching net zero by 2050, and 2045 in Scotland. SSE will continue to work with stakeholders as part of their economic recovery plans from Coronavirus. Additionally, as a Principal Partner for COP26, SSE will continue to work with the UK and Scottish Governments ahead of the summit in Glasgow in November 2021.</td>
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<tr>
<td>Energy efficiency</td>
<td>Support</td>
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The 2012 Energy Efficiency Directive was amended in 2018 to create a headline EU energy efficiency target for 2030 of at least 32.5% The comprehensive Fit for 55 Package, published in July 2021, includes an amendment to this Directive which SSE will monitor closely. SSE will continue to work, via Eurelectric, on this issue and has supported Eurelectric’s work on the European Commission’s Renovation Wave initiative which aims to improve the energy performance of buildings and guarantee that renovations lead to higher energy and resource efficiency.

SSE has been consistent in its view of being fully supportive of energy efficiency targets. SSE remains supportive of a bottom up approach to expand upon and tighten existing legislation in order to implement cost-effective energy efficiency measures for the economy. In September 2020, SSE engaged with and supported Eurelectric’s position paper on the European Commission’s Renovation Wave. The paper identified seven key enablers for the Renovation Wave to be a success, including: the prioritisation of direct electrification of heating and cooling in buildings, implementing measures to benefit low-income households who wish to make their homes more energy efficient, and creating the legislative framework to support building renovation.
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<td>Clean energy generation</td>
<td>role via Eurelectric and Wind Europe in engaging with European stakeholders on the comprehensive European Green Deal. SSE is particularly supportive of the European Commission’s efforts to implement a European Climate Law to enshrine a climate neutral EU by 2050 and has engaged with the Head of Cabinet for the Executive Vice President with responsibility for the European Green Deal. SSE has also engaged with the European Commission on the EU Offshore Renewable Energy Strategy and strategy on energy system integration. Through its position within Eurelectric and Wind Europe, SSE has also engaged with the relevant departments in the European Commission on the European Hydrogen Strategy, the revision of the TEN-E Regulation, and the assessment of the final National Energy and Climate Plans.</td>
<td>SSE continues to play an active role via Eurelectric and Wind Europe in engaging with European stakeholders on the comprehensive European Green Deal. SSE is particularly supportive of the European Commission’s efforts to implement a European Climate Law to enshrine a climate neutral EU by 2050 and has engaged with the Head of Cabinet for the Executive Vice President with responsibility for the European Green Deal. SSE has also engaged with the European Commission on the EU Offshore Renewable Energy Strategy and strategy on energy system integration. Through its position within Eurelectric and Wind Europe, SSE has also engaged with the relevant departments in the European Commission on the European Hydrogen Strategy, the revision of the TEN-E Regulation, and the assessment of the final National Energy and Climate Plans. SSE has welcomed the European Climate Law and the commitment from the European Commission to an EU-wide 2050 net zero emissions target. SSE strongly believes that a renewables-based energy system is the most efficient and cost-effective path to reaching this goal. In 2020, SSE called on the EU to scale up its ambition and revise the current 40% reduction target to 55% based on 1990 levels and was pleased to see the European Commission pledge to introduce the necessary legislation to enact this via the Fit for 55 Package.</td>
<td>SSE welcomed the European Climate Law and the commitment from the European Commission to an EU-wide 2050 net zero emissions target. SSE strongly believes that a renewables-based energy system is the most efficient and cost-effective path to reaching this goal. In 2020, SSE called on the EU to scale up its ambition and revise the current 40% reduction target to 55% based on 1990 levels and was pleased to see the European Commission pledge to introduce the necessary legislation to enact this via the Fit for 55 Package.</td>
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Other, please specify (Low-carbon networks) | Support | SSE has a networks business, SSEN, that owns and operates transmission & distribution networks across GB. SSEN has engaged directly with OFGEM as part of the current RIIO-1 price control and discussions on the next set of price controls in the 2020s. SSE has also provided BEIS with evidence from demonstration projects into best practice for delivering low carbon networks. SSE has recently issued tenders as part of business-as-usual to procure flexibility as an alternative to network reinforcement in constrained areas. For example, SSEN can provide incentives to energy efficiency projects that reduce peak demand. | SSE has a networks business, SSEN, that owns and operates transmission & distribution networks across GB. SSEN has engaged directly with OFGEM as part of the current RIIO-1 price control and discussions on the next set of price controls in the 2020s. SSE has also provided BEIS with evidence from demonstration projects into best practice for delivering low carbon networks. SSE has recently issued tenders as part of business-as-usual to procure flexibility as an alternative to network reinforcement in constrained areas. For example, SSEN can provide incentives to energy efficiency projects that reduce peak demand. | SSEN has fully supported the low carbon networks programmes. In a recent publication Supporting a Smarter Electricity System, SSEN set out a vision to transition from a Distributed Network Operator (DNO) to a Distributed System Operator (DSO), which acts as a neutral facilitator of new technologies. An example of SSEN supporting new technologies is the My Electric Avenue project, which investigated the impact of Electric Vehicle (EV) clusters on the electricity network. Following on from the findings of this project a new project called ‘Smart EV’ is collaboration with other Network Operators, Government, Ofgem and representatives from automobile and digital industries. One of the key objectives is to agree standards for EV charging. | SSEN has fully supported the low carbon networks programmes. In a recent publication Supporting a Smarter Electricity System, SSEN set out a vision to transition from a Distributed Network Operator (DNO) to a Distributed System Operator (DSO), which acts as a neutral facilitator of new technologies. An example of SSEN supporting new technologies is the My Electric Avenue project, which investigated the impact of Electric Vehicle (EV) clusters on the electricity network. Following on from the findings of this project a new project called ‘Smart EV’ is collaboration with other Network Operators, Government, Ofgem and representatives from automobile and digital industries. One of the key objectives is to agree standards for EV charging. |
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<td>GB, TNUoS charging methodology continues to present barriers to the deployment of Scottish renewable projects. The volatility and unpredictability of future charges also creates challenges for the forecasting of future costs which fluctuate each year, impacting projects across GB. Our key objective is to continue to build the case for TNUoS reform led by stakeholder feedback, and encourage a review into the current methodology in the context of net zero delivery.</td>
<td>SSEN Transmission has been engaging with the UK Government and wider stakeholders on the case for Transmission charging reform (TNUoS) to support net zero delivery. Our generation customers and wider stakeholders have been consistently telling us that charges for transmission access in the north of Scotland, as well as uncertainty about future charges, are acting as a barrier to the commercial viability of renewable energy projects. Ongoing engagement continues with BEIS, Ofgem and the Scottish Government to highlight concerns and call for review and reform of the current regime on behalf of our generation customers.</td>
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**Other, please specify (Planning)**

| Support | SSEN Transmission continues to engage with the Scottish Government, customers and wider stakeholders as the next iteration of the Scottish Planning Framework (National Planning Framework 4 (NPF4)) is developed. | We continue to take an active role in shaping the next planning framework as the detail of NPF4 is developed. We believe that NPF4 should deliver a supportive and efficient planning framework that recognises the importance of sustainable development and supports net zero and green economic recovery ambitions |
Clean energy generation

SSE has advocated for actions to enable deployment of 40GW of offshore wind by 2030 and 75GW by 2050, as set out by the Committee on Climate Change. This will ensure that the UK continues to be the global leader on offshore wind, attracting significant inward investment, whilst also ensuring that we are on track to meet our carbon budgets in line with achieving net zero by 2050. In 2020, SSE Renewables (SSER) published Delivering 40GW of offshore wind in the UK by 2030: A high level roadmap, which set out nine clear actions which must be taken to deliver the 2030 medium-term commitment. These include removing barriers to the consenting process, reforming electricity market design, promoting deeper cross-departmental collaboration and resource to mitigate aviation radar constraints, developing a more efficient approach to development of the grid infrastructure needed to integrate offshore wind into the electricity system, implementing annual CfD auction rounds, more regular and increased seabed leasing volume, strategic investment to support development of UK supply chain, developing a strategy for floating wind, and ensuring geographical diversity of the wind fleet.

Current UK Government to increase the UK’s offshore wind target to 40GW by 2030. SSE believes that delivering this is only feasible provided enabling actions are taken by Government, regulators and stakeholders. Such a significant ramp up in deployment requires a corresponding increase in capabilities and cooperation across Government departments as well. The revenue stabilisation provided via the Contracts for Difference (CfD) will continue to play a vital role in developers delivering low cost projects and being able to secure project finance. However, there is already a strong case for moving to annual CfD auction rounds from the current biannual approach, as it maximises deployment of projects by allowing them to enter as and when ready. Achieving 40GW of fully constructed offshore wind projects by 2030, in SSER’s view, is impossible to achieve without annual auctions from 2025. Long term wholesale energy price expectations, in particular the impact of increasing amounts of zero/low marginal cost generation are a critical factor when considering investments in new projects, project life extensions and repowering of existing offshore wind farms after their CfD contract ends. Whilst the evolution of wholesale energy prices is uncertain, it would be prudent to undertake an in-depth assessment of whether policy and market design is fit for purpose to satisfy the Net Zero goals set by government in order to maintain investor confidence.

SSER is encouraging the UK Government to start this process in earnest to ensure the attractiveness of the UK as a destination for inward investment in offshore wind is preserved into the future. Through the Offshore Transmission Network Review, SSER is also working closely with government and other key stakeholders to seek solutions to a more coordinated and accelerated grid connection process for offshore wind farms. Finally, the planning system, across all jurisdictions needs to better reflect and account for the climate emergency. The planning system should clearly signal that the priority of achieving Net Zero will necessarily entail a shift in the balance of planning judgement towards infrastructure necessary to meet Net Zero targets.
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<td>Other, please specify (Ireland’s Climate Action Plan 2021)</td>
<td>SSE engaged with government departments and parliamentary members on various aspects of Ireland’s Climate Action Plan and its implementation. SSE advocated for a 80% renewable electricity target, early delivery of offshore wind target and measures the drive the decarbonisation of heat and transport.</td>
<td>on the implementation of their Climate Plan on matters of relevance to various business units in SSE Ireland.</td>
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| Other, please specify (Onshore wind in Ireland) | Support | SSE engaged with Government on policies and measures that need to be introduced to ensure Ireland is in a position to double its onshore wind capacity to 8GW by 2030 in line with Climate Action Plan ambition. This has included engaging with Government on wind planning guidelines to ensure planning rules are balanced and enable the sustainable development of onshore wind in Ireland. SSE has also engaged with the Irish Government on the design of Ireland’s Renewable Electricity Support Scheme. | SSE will continue to engage with the Government on matters relating to onshore wind. | |

| Other, please specify (Offshore wind in Ireland) | Support | SSE has been a leading advocate for offshore wind in Ireland. This year we have engaged with the Irish Government on marine planning matters including offshore grid policy, the National Marine Planning Framework and the Marine Area Planning Bill which will introduce a new offshore consent regime for Ireland. | SSE will continue to engage with the Government on matters relating to offshore wind. | |

<p>| Energy efficiency | Support with minor exceptions | SSE is part of an Energy Efficiency Obligation Scheme (EEOS) in Ireland which applies to both domestic and commercial sectors. The scheme has been successful in delivering energy savings. Consultation took place on the next phase of the EEOS scheme in April of this year which will bring the scheme in line with the new Energy Efficiency Directive 2018. Ireland’s energy efficiency target will be higher in the next phase. | SSE supports the overall aim of the scheme. SSE believes that energy efficiency measures are the best approach for consumers to minimise their energy bills. SSE however believes that the way in which energy efficiency measures are implemented and funded should be reviewed, so they facilitate cost effective delivery. |</p>
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<td>Microgeneration in Ireland</td>
<td>Support</td>
<td>The Scottish Parliament Economy, Energy and Fair Work Committee ran an energy inquiry (January 2020) about electric vehicles: their impact on electricity networks (positive and negative) and how consumer interest in purchasing EVs can be encouraged. The inquiry also covered local energy, covering the achievability of community and locally-owned energy targets, how community schemes could be encouraged and what more Distribution Network Operators (DNOs) like SSEN could do.</td>
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<tr>
<td>Other, please specify (Electric vehicle infrastructure)</td>
<td>Support</td>
<td>SSEN recommended that network operators be allowed to invest in networks ahead of the surge in demand that is expected as a result of the decarbonisation of transport (known as ‘anticipatory investment’) and emphasised the need for fairness to be embedded in the transition to net zero; SSEN is committed to ensuring that no-one is left behind.</td>
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<tr>
<td>Other, please specify (Future energy system)</td>
<td>Support</td>
<td>SSEN welcomes the focus on local energy policy within Scotland and agreed with the government’s approach. SSEN also seeks to put stakeholders at the heart of the future energy system, works to ensure that nobody is left behind in the transition to a net zero energy system and supports transparency to ensure a fair system. Our response called for anticipatory investment to be allowed in the electricity network, to prepare for the uptake of low carbon technologies such as electric vehicles and heat pumps.</td>
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**Economy, Energy and Fair Work Committee** ran an inquiry and call for views (December 2020) about the Scottish Government's recently released Climate Change Plan update. SSE Group provided both written and oral evidence to the Committee on the CCPu. We welcomed the plan which provides a promising and achievable series of commitments on what the Scottish Government intends to do but called for further development on how this will be delivered. Industry would benefit from a net zero delivery plan in order to be able to make a more detailed assessment of the extent to which this plan will deliver net-zero. Our response also called for reform of Scotland’s planning system ahead of NPF4 in 2022 to achieve the commitments set out within the CCPu, and to fully unlock Scotland’s low-carbon potential.

**Other, please specify (Plan update (CCPu))**

**Support**

To support the delivery of the updated Climate Change Plan, a revised Draft Public Engagement Strategy was published for consultation setting out how the Scottish Government will continue to engage, support and encourage climate action amongst the public. SSE Group and SSEN provided responses to this consultation in March 2021.

**Other, please specify (Scottish Government Draft Climate Change Public Engagement Strategy Consultation)**

To support the delivery of the updated Climate Change Plan, a revised Draft Public Engagement Strategy was published for consultation setting out how the Scottish Government will continue to engage, support and encourage climate action amongst the public. SSE Group and SSEN provided responses to this consultation in March 2021.

**C12.3b**

**(C12.3b) Are you on the board of any trade associations or do you provide funding beyond membership?**

Yes

**C12.3c**

**(C12.3c) Enter the details of those trade associations that are likely to take a position on climate change legislation.**

**Trade association**

Energy UK, Association of Decentralised Energy (ADE), Electricity Association of Ireland

**Is your position on climate change consistent with theirs?**

Consistent
sector on the island of Ireland by 2050.

**How have you influenced, or are you attempting to influence their position?**
SSE has influenced adoption of positions in support of action via its Board position in Energy UK. SSE also has staff on various committees in these associations which helps to reinforce progressive positions on key issues. SSE is also represented on the Board of EAI and has engaged extensively on its policy positions for a decarbonised electricity system in Ireland.

**Trade association**
Eurelectric (members via Energy UK, Energy Networks Association and Electricity Association of Ireland)

**Is your position on climate change consistent with theirs?**
Consistent

**Please explain the trade association’s position**
Eurelectric’s major objectives are to deliver carbon neutral electricity in Europe ‘well before’ 2050, ensuring a cost-effective, reliable supply through an integrated market and developing energy efficiency and the electrification of the demand side to mitigate climate change.

**How have you influenced, or are you attempting to influence their position?**
SSE has influenced adoption of positions in support of action via its Board position in Energy UK. Until recently, SSE’s Chief Executive was Vice President of Eurelectric. SSE also has staff on various committees in these associations which helps to reinforce progressive positions on key issues. SSE has supported Eurelectric’s engagement regarding fleet electrification, COP26, UK-EU energy relationship, and carbon pricing

**Trade association**
Renewables UK

**Is your position on climate change consistent with theirs?**
Consistent

**Please explain the trade association’s position**
Renewable UK is the trade association representing renewable organisations in the UK (wind, solar, wave and tidal). Their aim is to create the conditions that will see the renewable sector continue to thrive. Renewables UK supports the 2050 UK net zero target.

**How have you influenced, or are you attempting to influence their position?**
As a member of this organisation, SSE has strongly advocated that Renewable UK make the case for, and support a policy environment that encourages, low-carbon investment. Since 2018, SSE Renewable’s Director of Capital Projects has sat on the Board in a personal capacity. SSE was an event partner for RenewableUK’s Onshore Wind Energy 2020 event which explored the resumption of Contract for Difference auctions for onshore wind, and a Strategic Event Partner for RenewableUK’s Global Offshore Wind event during which SSE called for barriers to offshore wind to be addressed such as enabling timely
Trade association
Scottish renewables

Is your position on climate change consistent with theirs?
Consistent

Please explain the trade association’s position
Scottish Renewables is the trade association representing Scotland’s renewable energy industry. They work to grow Scotland’s renewable energy sector to sustain its position at the forefront of the global clean energy industry. Scottish Renewables supports the 2050 UK net zero target.

How have you influenced, or are you attempting to influence their position?
As a member of this organisation, SSE has strongly advocated that Scottish Renewables make the case for, and support a policy environment that encourages, low-carbon investment in Scotland with a strong focus on guiding engagement around Scottish planning policy to support future onshore wind development. SSE Renewables was the event sponsor of Scottish Renewables’ Annual Conference 2020 during which SSE representatives called on the Scottish and UK Governments to take bold political action and match net zero ambitions.

Trade association
Confederation of British Industry (CBI) (in Northern Ireland only) IBEC – Ireland only

Is your position on climate change consistent with theirs?
Consistent

Please explain the trade association’s position
CBI and IBEC supports energy efficiency, future proofing business against climate threats and moving businesses towards carbon neutrality by enabling the market to develop the solutions that are needed to achieve these goals. In the Republic of Ireland, IBEC has welcomed Ireland’s Climate Action Plan. In March 2021, the Irish Government approved the final text of legislation to set Ireland on the path to net-zero emissions by 2050. In Northern Ireland, engagement with the CBI has been focused on highlighting the need for an revised energy policy in NI. The Committee on Climate Change advised in December 2020 that Northern Ireland must cut its carbon emissions by 82% by 2050 in order to reach net zero. In March 2021.

How have you influenced, or are you attempting to influence their position?
SSE has advocated for IBEC to take a strong and supportive position on the Climate Action Plan and stands ready to help Ireland deliver on its net zero commitments. SSEs Chief Executive also participated in IBEC’s Business Leaders Conference in February 2021 in support of IBEC’s work on Irish climate policy in calling for the introduction of carbon budgets, sectoral emissions reduction targets, and a reinforced Climate Action Council. SSE’s Chief Executive also set out SSE’s offshore wind ambition for Ireland and desire for climate investment in the Irish economy which was covered in a feature for the Irish Times. In Northern Ireland, SSE has fully supported the CBI’s call for low carbon invest-
zero aligned economic recovery post COVID-19'.

**Trade association**

WindEurope

**Is your position on climate change consistent with theirs?**
Consistent

**Please explain the trade association’s position**
Wind Europe is the trade association representing the wind industry and is actively promoting wind power in Europe and worldwide. WindEurope has called on the European Commission to include a 100% renewables scenario as part of the Impact Assessment for the EU Climate Law.

**How have you influenced, or are you attempting to influence their position?**
As a member of this organisation, SSE has strongly advocated that WindEurope make the case for, and support a policy environment that encourages, low-carbon investment. SSE Renewables has representatives on various WindEurope Working Groups in order to advocate our positions. SSE has been fully supportive of WindEurope’s engagement on the European Green Deal, in particularly the EU Offshore Renewable Energy Strategy (ORES).

**Trade association**

Wind Energy Ireland (WEI)

**Is your position on climate change consistent with theirs?**
Consistent

**Please explain the trade association’s position**
WEI (previously IWEA) is the all-Ireland representative body for the Irish wind industry, working to promote wind energy as an essential, economical and environmentally friendly part of the country’s low-carbon energy future. They work to grow Ireland’s wind energy sector to sustain its position at the forefront of the global clean energy industry.

**How have you influenced, or are you attempting to influence their position?**
As a member of this organisation, SSE has strongly advocated that IWEA WEI make the case for an ambitious offshore and onshore wind policy, complemented by a policy environment that encourages, low-carbon investment in Ireland. SSE has Corporate Affairs representatives on WEI working groups which helps to reinforce progressive positions on key issues such as Irish planning policy to support future onshore and offshore wind development.

**Trade association**

Business in the Community Ireland

**Is your position on climate change consistent with theirs?**
Consistent

**Please explain the trade association’s position**
How have you influenced, or are you attempting to influence their position?

In line with our climate commitments to science-based targets, SSE has been signed up to the Business in the Community Ireland Low Carbon Pledge since 2019. Through this, SSE is part of a movement of over 60 companies in Ireland sharing knowledge and collaborating across all sectors to drive climate action. The key strength of the Pledge lies in the collaborative platform which enables signatory companies to learn from each other's successes and challenges. By working collectively, the Low Carbon Pledge movement builds capacity, fosters innovation and drives the ambition in delivering the changes needed. SSE has also played a key role in engaging with BITCI on responsible business, sustainability, and diversity and inclusion. SSE is proud to be certified by BITCI for the Business Working Responsibly Mark.

C12.3e

(C12.3e) Provide details of the other engagement activities that you undertake.

SSE engages with other organisations on an ad hoc basis in relation to climate-related issues and communications such as carbon pricing, net zero and the low carbon transition. For example:

· In June 2020, SSE also joined over 200 businesses in co-signing a letter, coordinated by The Prince of Wales’s Corporate Leaders Group, to the UK Prime Minister stating that we believe that an ambitious low carbon growth and environmental improvement agenda can deliver a Coronavirus recovery plan, as well as make the UK economy better prepared to deal with future shocks such as those related to climate change.

· SSE joined other leading low carbon developers to write to the UK Government, encouraging them to adopt a robust approach to carbon pricing in their future energy plans. The letter outlined the need for stability and certainty, and called on HM Treasury to ensure efforts to reach net zero by 2050 are not undermined by any reduction to the carbon pricing level in Great Britain currently made up of the EU ETS and the Carbon Price Support (CPS).

· Since the 1st of January 2021, following Brexit, the UK Government has established a UK Emissions Trading Scheme (UK ETS) to replace the EU ETS, with the Group’s UK generation assets now operating under the UK ETS carbon pricing system. SSE welcomed the establishment of a UK Emissions Trading System (ETS) in December 2020 and has called upon