

Responses to Draft Determination of 23 August 2022

Unattributed

1. Dear Dr White

I have seen your draft determination on electricity prices, and agree wholeheartedly with that which you wrote. Sark residents should not have to pay such extremely high prices for electricity, when it can be shown that a lower price is possible for the electricity company to make a profit. Many people on Sark struggle to make a living; it's not right to fleece them unnecessarily for electricity, which is a necessity.

We know that installing renewable energy producers on Sark is an act that will eventually lower electricity prices. It is terrible to be using dirty and expensive diesel when other cleaner; cheaper and more sustainable technologies are available. I hear that offers of help in installing these other technologies, such as wind and solar, are being made to Sark.

I fully support you in your determination, as published. Please present it and let's hope that wisdom prevails.

A resident

2. Dear Mr White,
I hope this finds you well

I read your determination on electricity prices, on your website, and absolutely concur with your findings. It's appalling that Sark residents have to pay such high prices for energy, when it is clear that a lower price is possible for SEL to still make a profit. Furthermore, it has been shown that installing renewable energy technology is a possibility that will eventually lower prices to almost half of the 74p that is about to be charged. It is inexcusable to be using diesel as an energy provider in this day and age when other cleaner and cheaper technologies are available, and offers of help in installing these other technologies are being made to Sark.

Most Sark residents can ill afford to be paying high prices for an inefficient system, especially as all other living costs are rising. The ancient electric system on Sark is crippling the island.

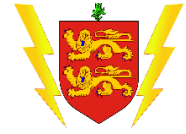
A resident

3. Dear Dr White,

Submission not posted on web-site at resident's request

A resident

4. Dear Commissioner



I remain concerned about the overall state of the generating and distribution equipment, my view is that no due diligence was done prior to the acquisition by AWP. This conclusion is based upon the fact that there are no audited accounts since 2016 (a key need for a purchaser) and the survey prepared last year indicated the dire state of the equipment which should have been rectified since the acquisition. There is no evidence that this has taken place, and some of the equipment is in a dangerous state, as reported. As this is now in the public domain one might ask if failure to remedy would invalidate the company insurance cover. High voltage equipment is still accessible in an unfenced state in public areas on the island with no safety signage.

Your examination of what passes for accounts (unaudited) includes depreciation which is an allowance to provide for replacement of essential equipment, but there is no evidence that any acquisition has been made. This puts the resilience of the system in doubt which places the community at risk. The charge for depreciation would go a long way towards acquiring one fresh generating engine.

The maintenance expenditure, where incurred, is being done on a 'crisis' basis rather than on a routine preventive basis. This would be reduced if proper machinery replacement had taken place, probably without any increase in the allowance for depreciation, the resilience of the system would improve and the maintenance could be expended on a more constructive basis.

The supplier has made no attempt to negotiate wayleaves with landowners and has not supplied them with details of routing of cabling across their land.

I can see no justification for discounts to larger users, and I believe that the £40 minimum charge should be per customer, not per meter.

Suppliers profits should be protected against fluctuations in fuel supply costs, but consumption losses will be due to the high prices charged and need to be faced by the company not the customer.

The high price may well influence some customers to generate their own power and the company should not expect to be insulated against that event.

Your analysis of the loss is correct. The legal costs arise from a resort to lawyers rather than a sensible co-operative approach to all land owners and one in particular. The latter case has resulted in 19 houses at the north of the island being disconnected and now supplied at the expense of Chief Pleas, with no evident attempt by the company to reconnect the supply. Depreciation is designed as already said is to be expended on replacement equipment.

I can understand and follow your logic in calculating the fair price of electricity despite the paucity of accurate and verified financial information. If SEL disapprove of any of your estimates and conclusions it must be open to them to supply you with verifiable evidence to support their allegations.

A resident



5. Dear Commissioner,

Thank you for the very comprehensive documents and for giving the electricity users in Sark a chance to comment on them.

I will also be writing to Chief Pleas before the 14th September Extraordinary meeting.

I did not know about the discount applied to heavy users of electricity. It is somewhat surprising these days when the generation is by fossil fuel only. We may be a small island but we should play our part in reducing these emissions.

This of course means that a great effort should be made by SEL to work towards renewable sources of energy. With wind in the winter months and sun in the summer plus a back-up diesel generator, Sark must be a good position to do this. I have written to Chief Pleas before about the proposed plan put forward to them via you. Let's hope they start the process.

I do think, however, that Sark should be very sure of any contingency plans in place by the relevant committee (in Guernsey I believe) as we would very likely have a shut down at some time(s). I know that's not your role so, again, Chief Pleas must be pro-active. We all know the state of the equipment is dire and that SEL have done little or no maintenance over the years.

It must be difficult to protect against the rise and fall (?) in fuel prices – I wonder how other suppliers in EU etc manage? Pre-paying their suppliers? More storage, though only for gas I guess.

Wealthier customers going off-grid: it's a great shame we have no law obliging the electricity supplier to buy back the surplus power at a more reasonable price. With the current situation in energy prices globally I would imagine there will be many more options available to install off-grid units. If I were younger I would certainly investigate that and I would certainly use more power if it were produced in a more sustainable way.

A resident

6. Dear Tony,

I've been through your Draft Determination. It's hard to believe this battle over a fair and reasonable priced electricity on Sark, is still going on, isn't it? How long has it been? I really admire your persistence - thank you.

I find the discount for heavier consumers far too extreme. Anyway, who are they? The ones who'd be expected to be using a lot are, I believe, not being supplied by SEL.

I have always felt it totally unfair that we, the consumers, are expected to pay legal costs, which are directed against us - what a cheek!

I'd love Sark to have a completely new system of generating electricity - it's what I've always wanted, for us to be free of being diesel and SEL dependant. Surely we're small enough that it shouldn't be too difficult? I'm not mad about wind turbines (having seen fields of them in Irish beauty spots), but I'd certainly have no objection to having a couple here along with solar panels.



A resident

7. Dear Dr. White

Thank you for all the hard work you have done for Sark.

I read your Draft Determination with interest and fully support your reasoning and your conclusion on what would constitute a fair and reasonable price for electricity under the present regime.

Hopefully we will soon get some further information from Chief Pleas as to what is proposed for the future. It is all very concerning and I am sure will take time to implement.

Whilst I appreciate costs are escalating everywhere a stable and reliant cost effective electricity supply is vital for Sark and we should not be held to ransom by an individual company. I am finding ways of cutting my electricity usage to save money. Whilst I appreciate the hardship caused to families it is also hard for pensioners such as myself. Having worked hard all my life I am now at home more than ever and question whether I should turn on small luxuries or purchase electric gadgets to make my life easier. A lower unit cost would encourage me to use more electricity. The more the price increases the more those that can afford it will install solar panels and renewable systems adding to what is I am sure a declining use of Island produced electricity.

Thank you again for all you are doing

A resident

8.

I have had a good read through and generally support your conclusions.

A couple of minor question: now that Chief Pleas are supplying electricity for 19 households (ours included) who owns and is responsible for the bit of infrastructure (cables, meters) that is involved in our supply? SEL or Chief Pleas? If the latter presumably this value comes off the value of the investment used to calculate the return for SEL? Also, although Chief Pleas mirror the prices charged by SEL in reality their (i.e. our) costs must be very different from those of SEL.

Two residents

9. Dear Dr White,

Thank you for giving me the opportunity to contribute my opinions to your consultation related to your August 2022 draft determination.

While it is unsurprising that the price per unit has gone up, as it has everywhere due to the rise in oil prices, it would appear from your draft that there is evidence that it did not need to go up as much as it has. As SEL has a monopoly we do not have the option to switch, neither do we have the money to afford an independent off grid system so, especially given that we, like most others on Sark, need electricity to pump water, we have no option but to pay the price



that SEL decides to charge. A Price Control Order would be very welcome as it was at 54 p last year. It also lessens uncertainty for household budgeting.

Thank you also for using evidence from the independent Energypeople report to calculate what might be the price p/Kwh should a completely new system come into existence. This would be very significant and welcomed. In addition to being greener and cheaper it would prevent us being constantly at the risk of changing prices of oil because of wars or political unrest. If there were an island wide system that was greener and cheaper it would also lessen the constant threat (and it now has to be viewed as a threat to people of average income) of those who are able to afford it going off grid. One would hope that measures were put in place so that any new supplier would not be able to hold the island to ransom with threats of outage in the way the present owner and his predecessor has.

Should an island wide greener reliable system come into being, following, I would hope our government consulting widely and working out how to get from where we are to where we want to be and mitigating against potential legal risks from the present supplier, I would make considerable changes in my energy use. An elderly oil boiler would be replaced by an electric one. We would prefer an electric oven with a gas hob. Age and dodgy knees suggest that my next bike will be an electric one. In short, I **want** to use more electricity but not at 74p per unit manufactured in a failing and dirty power station.

Thank you for your work,

A resident

10. Dear Anthony

I find it difficult to understand the annexe to your draft determination. I suspect that the owner of SEL makes it particularly difficult to provide the clarity to yourself, and therefore to us – the customers – to understand. Smoke and mirrors and deliberate obfuscation spring to mind

Without clear evidence it must be near on impossible to work out a reasonable return on investment that SEL should get. There seems to me to have been no investment in the infrastructure of either the generation equipment or the distribution network.

7.3% return on investment seems to be very high. I would have thought that a ROI of 3-5% would be more reasonable in a regulated utility

I note you make mention of decontaminating the land of the power station. This certainly should not be loaded onto the last few years of the lease. Provision should have been made at a much earlier stage.

There has been no attempt by SEL to install any solar / wind power. The incentive for home generation is absent, thus generation costs are very sensitive to the price fluctuation of diesel fuel. A reasonable operator would have attempted some investment in infrastructure to facilitate cost reduction for the end user

I believe that the wealthy people who have gone “off grid” would have ideally liked to remain “on grid” but that the policies of SEL restrict that option. In my opinion the rest of the population should not pay the price for the regressive policies of SEL.



The higher consumption customers should in my opinion enjoy a discount. I assume this is standard practice in the UK? I assume most of these customers are business customers?

If there are fluctuations in the price of diesel fuel then SEL do need some protection. I note that in the UK to price cap is reviewed now every 3 months. The suppliers deem this essential given the volatility of fuel prices. If SEL were reasonable then a simple formula could be adopted that was clear and transparent. Sadly clarity and transparency do not seem to in the SEL's lexicon

A resident

11. Dear Mr. White,

POINTS.

1. On 19th July 2022, Sark Electricity Limited (SEL) set a standard tariff of 74 p/kWh for electricity from 1st August 2022. I am aware that the £40 monthly minimum usage charge is still being applied and that large discounts are given to heavier consumers of electricity, ranging from 12 to 19 p/kWh.

This justifies your intervention as this was more or less the situation before you arrived.

2. have analysed the costs involved in producing and distributing electricity in Sark and the profit margin that an efficient operator could reasonably contemplate. I have come to the preliminary conclusion that the prices now being charged by SEL are not fair and reasonable. Depending on the evidence provided and representations made to my Office in submissions in response to this paper, issued under Section 14 of the Control of Electricity Prices (Sark) Law, 2016 ("The 2016 Law"), I shall make a Determination under Section 13 of the 2016 Law. Following which, my Office may consult on the imposition of a Price Control Order (PCO), under Section 15 of the 2016 Law.

Agree with this.

3. In coming to my preliminary conclusions on what might constitute a fair and reasonable price for electricity in Sark, I first updated the analysis of the 2019 Determination, assuming:

the supplier continues to operate a system based on diesels and the existing distribution system's layout.

- the supplier will be able to obtain wayleaves for the electrical equipment installed on others' land and the supplier's profits will continue to be protected from movements in electricity demand and fossil fuel prices. As a result, the supplier will be satisfied with a return of 7.3% per annum on investment.
- the Minimum Monthly Usage Charge remains at £40 per month.

Disagree with this. Totally unfair as I have explained on other occasions. As an example, it adds £40 per month if a family goes on hoiloiday or into hospital. I shall



as already stated disconnect all meters from my properties, except that for the main house.

- the current range of discounts for large customers of 12-19 p/kWh is retained.
- the supplier should not be allowed to increase prices to residents on account of other customers deciding to generate their own power. Consumption of electricity in Sark not provided by SEL in 2021 amounted to 140,000 units.

Agree with this conclusion.

- annual island-wide consumption is 1,560,000 units, consistent with that reported by SEL, Chief Pleas and own generators for January-June 2022.
- diesel fuel delivered to Sark costs 111 p/litre – the average price for July 2022.

This analysis demonstrated that a reasonably efficient operator would be able to enjoy a satisfactory return were the standard unit rate of electricity around 64 p/kWh.

4. In addition, I have examined the energy people report, commissioned by my Office and available at www.epc.sark.gg. This suggested that a completely new system could provide electricity at a lower cost than refurbishing SEL's existing distribution network.

The problem might be to get Chief Pleas to move quickly on this.

5. I have therefore also considered the prices an operator would need to charge, were it to install a completely new distribution system and to deploy a mix of different generation technologies, diesels, wind turbines and solar PV panels, to generate electricity. This analysis, which used the financial model supplied by energypeople (available at www.epc.sark.gg) suggested that the maximum unit price could be far lower, at around 47 – 51 p/kWh.

This has a certain logic to it although lower prices would be even better.

6. The achievement of prices lower than 50 p/kWh depends on some wind power, rather than just solar PV panels, being installed in Sark. Other than development control legislation, I am not aware of any legislation in force in Sark that prohibits the erection of wind turbines of 30-45m in height. I therefore believe it is reasonable to assume that a reasonably efficient and cost-conscious operator would seek and obtain permission to install one or more wind turbines and solar panels.

Which is what most of us are working on.

7. A description of the analyses of the diesel-based system, and those using alternative forms of generation is available in the Annex to this Draft Determination.
 - i. customers with higher electricity consumption should enjoy such large, discounted unit prices. **Discounted from what if you say that prices are neither fair nor reasonable? If they are fair and reasonably no-one will seek discounts.**



- ii. the regulated supplier's profits should be protected from swings in consumption and diesel fuel prices under any PCO. **Be also aware of speculation in all of these price rises.**
- iii. customers should continue to be protected from the impact of wealthier customers deciding to generate their own power, even though this would reduce the return that the supplier could expect to receive. **I don't think it will be only wealthier customers who want to generate their own power. I, for example, am working with my tenants to do something communal for all of us and we are not wealthy.**

10. I should be grateful to receive submissions by 15th September 2022. All responses will be shared anonymously with SEL and, unless indicated otherwise, will be published on my Office's web- site.

I will also add that if you consider that prices are not fair and reasonable, we have grounds for not paying our bills to SEL.

A resident

12. As a relatively new resident (and freeholder) on the island, I read your report and that of Energy People with interest. I would like to offer some observations on your Draft Determination, which seems very sensible and good to me.

Focussing on your key questions:

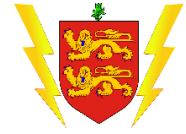
i) Regarding the discounts of 12-19p/unit for larger users, based on current unit prices the discounts look like a 25% to 35% reduction on current prices.

I am concerned that there is a potential that other residents are actually subsidising larger users, almost all of whom are making profits from their electricity use, whereas most smaller users are only householders or micro-businesses. This is certainly something that needs to be looked at closely. I would not want to put businesses out of business, but if prices rise it is not fair that all excess costs should fall on smaller households who do not have the option to raise their prices or change any practices, especially as there is so little contribution back from taxes on businesses.

There could be a smaller discount, or a cap above/below which the discount does not apply so long as this does not simply equate to a greater profit for SEL, but is actually used for something useful like investment.

ii) I accept that the fuel price rises are, for once, not a problem created by either SEL or the Sark government, but in the short term some pain needs to be borne on both sides, The finances should be clear enough to ensure that any price rises are proportionate and that rises are not "baked in" if energy costs fall in the future.

iii) The issue of some residents generating their own electricity seems to me to be a largely problem of SEL's making - looked at objectively, their prices are very high, the supply is perceived to be erratic or at risk, and they do not offer any incentives for people to feed back excess into the grid. If anything, they are punitive.



Sark is sunny at least part of the day most days, so there is free energy coming out of the sky if you have the means to trap it, so why not do this if you can? Even if they don't go off grid, lots of people are already doing solar hot water, or micro-generation for small things.

Rather than resisting local initiatives, residents (individually or as small, localised groups) should be encouraged to put up more renewables. The ad hoc system of solar panels and diesel generators, and at least one small wind turbine, on various properties across the island may be producing surpluses at times. These ought to be able to feed into the main grid.

A sensible system of tariffs that rewarded private investment in renewables and generating sources would, I think, encourage people to do this more, and so lessen the requirement for SEL or another company to produce all the electricity themselves. This could be part of the strategy for a new system relying on a mix of PV, wind and diesel with small blocks of PV scattered around the island on houses and out buildings rather than one big solar farm in a field.

I also think that there is a degree of fear-mongering by SEL - if electricity is not used, SEL does not have to produce it and therefore its fuel and other costs will be lower. If it is producing too much and wasting it, then it should produce less. Seeking a set monetary amount of profit regardless of their income should not be company's core objective.

I would also like to make several other points.

I strongly support the recommendations to nationalise the company and move swiftly to mainly wind and solar (and tidal if that could happen would be even better). As an island, Sark is at risk from climate change driven by excess use of fossil fuels. Anything that reduces this would be a good thing and would benefit everyone as well as reducing costs.

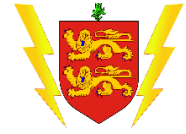
If SEL was state-owned, there would be no need for them to make excessive profits beyond what was required to fund future investment.

I really do not understand why the compulsory purchase process is taking so long. If the Sark government is incapable of organising this, then they ought to let someone in Guernsey or the UK do it for them!! Compulsory purchase is complex, but it is not rocket science.

Although the commissioner's report and that of Energy People looked only at the island, it seems to me that an alternative is a tie-up with one of the larger multi-national energy companies (the French EDF in particular) that might see a tidal generator. Alternatively, would it be possible simply to have a cable from France and therefore a more normal power system like the UK or the Continent?

I am astonished by the salary costs that SEL claims for - how many staff do they employ??? And how much are they paid?? Not many as far as I can see, and too much, clearly, This is clearly keeping customers' costs high, and is another reason the company should be taken over as soon as possible.

And finally, there should be a legal requirement for **all** landowners (freehold/tenement owners and leaseholders) to provide wayleaves for vital services (electricity, water, telephone, internet, and gas if there was ever a central supply, as well as rights of access for emergency services, etc). It should not be possible for a landowner to deprive other residents, whether they are related to that tenement or not, of such services at will as is the case now. Regardless of compulsory purchase, this ought to be enshrined in Sark laws as soon as possible.



Best wishes and thank you for your work,

A resident

13. Dear Commissioner,

I have read your draft determination with interest and thank you for the opportunity to comment.

I agree with your analysis and your conclusion that the price of 74p is too high.

My thoughts regarding the three points highlighted for specific comment :-

1 - Discounted prices for any specific consumer should not be made at the expense of other users.

2 - I'm content that the regulated supplier's reasonable return is protected.

3 - I believe that customers should be so protected (an investment plan along the lines of Energy people would remove the temptation to self supply)

I look forward to a final determination.

A resident

14. Thank you for all the work you have done regarding the price control and the future of Sark's electricity supply.

In answer to the 3 questions at the end of your draft determination of 23 August 2022,

1). I don't think private customers should get any discount however much electricity they use. There may be a case for businesses getting some sort of discount but generally I believe everyone should be using the minimum amount possible for environmental reasons. A person's ability to pay for high usage should not be a factor and they certainly shouldn't get discounts for using large amounts.

2). I think the supplier should be able to raise the price of electricity when fuel prices rise to enable them to make a reasonable profit but they should also reduce the price when fuel prices drop. I appreciate that at the moment fuel prices seem to be very volatile but I don't know enough about how the markets work to comment further.

3). I definitely think customers should be protected from the impact of some people going off grid. While the supplier has a monopoly I believe Sark residents need robust protection from price increases due to a few properties self generating. Most people cannot afford to set up a self generating system so have to rely on SEL for power.

I think proposition 3 from Policy and Finance that is due to be heard in Chief Pleas on 21 September seems the best option for Sark and I very much hope it can be implemented as soon as possible. I believe clean energy, as far as is possible is undoubtedly the only sensible option.



A resident

15. Dear Commissioner,

Having read your draft determination and request for comments I am writing to let you know that I agree wholeheartedly with your conclusion that the price of 74 pence per unit is too high.

Specifically, relating to your three points;

- 1 - Discounting the price for some customers should not be made at the expense of others.
- 2 - I accept that the regulated supplier's reasonable return should be protected.
- 3 - Customers do need to be protected from the impacts of (more) wealthier residents deciding to generate their own power.

A resident

16. Good morning Dr. White and thank you for your detailed and thorough draft determination. I do not possess the insights or the skills to add to your work, but having read the determination, I totally support your recommendations.

On the matter of the questions where you wanted feedback:

i. customers with higher electricity consumption should enjoy such large, discounted unit prices.

A small customer base is not one where I would have thought this would work. I can't see how SEL can offer large discounts to high volume users unless they have excess profits from which to draw or are penalising other users whose payments supplement the discounts. I can understand why discounts are offered; to incentivise high volume customers to remain on-grid, but this should not be at the expense of the main customer base.

ii. the regulated supplier's profits should be protected from swings in consumption and diesel fuel prices under any PCO.

Is this the case in the U.K? It is a wonderful world for a utility if their profits are protected. Surely this can't be the norm?

iii. customers should continue to be protected from the impact of wealthier customers deciding to generate their own power, even though this would reduce the return that the supplier could expect to receive.

If this doesn't happen, then anyone who can afford it will invest in their own renewables and there won't be a business anymore. A business model that incorporates existing private generation is something for the future, but unless there is a determined effort to keep everyone using SEL, there won't be a business for anybody to invest in.



The lack of clarity of vision and feedback on what is happening from Chief Pleas is alarming and especially considering the dire state of SEL's infrastructure. The security of supply is as big an incentive for those who can afford it to go off-grid as the inflated price of electricity that we're having to pay. This is something that we will be looking to do for ourselves at home, if this situation isn't resolved.

Thank you once again for your hard work - it really is very much appreciated.

A resident

17. Thank you for your time doing this report.
Please accept this email as confirmation of my full agreement and support of you draft.

A resident

18. Dear Dr White,

Thank you for your work in helping to control the charges levied by SEL, I agree with your findings.

I appreciate that costs must rise, but when there is no investment back into the company and its Infrastructure, the Island is being put in an increasingly dangerous position.

It would appear that the Power Station is on its knees and the grid severely outdated.

There can be few places better suited to the harnessing of wind and solar energy, and were Witney Price a man of his word he would have made changes by now in that direction.

Sadly the only wind being employed is man-made!

I am very keen to use cleaner power and in order for a community to survive and prosper on this island, it is imperative that the government work alongside experienced and altruistic organisations to introduce a modern energy supply.

I do hope that your work is widely appreciated and that our government will pay careful attention to the advice available.

A resident

- 19.

The price of electricity on Sark

This household is totally supportive of the Commissioner's determination to set a price for electricity of 64p.

What the Island really needs is a swift move towards a new system based on renewable and green sources for electricity. However, without the co-operation of SEL we seem to be locked into this fruitless and frustrating situation, which from my own experience in Chief Pleas, has been going on for far too many years.



The economy of Sark has been enormously damaged by the high price of energy which has acted as a drag on all business activity.

Sark has an elderly population - including ourselves - many of whom are struggling with high energy costs and we fully support the determination to reduce the price by 10p per unit.

But the greatest threat to our wellbeing is a catastrophic breakdown in electricity supply due to a system which relies on antiquated equipment that should have been replaced many years ago. It is worn out, uneconomic, and totally unfit for use. That is the real challenge.

Thank you for all your efforts on behalf of the community.

Two residents

20.

On behalf of the Policy & Finance Committee, I can advise that the Committee have no objections to the proposed determination.

21. Dear Dr White,

Thank you very much for allowing us to comment on your Draft Determination.

Once again I fully support your office and applaud you in your efforts to provide the residents with a price for Electricity, which is Fair and Reasonable.

This cannot be an easy task when dealing with SEL who rarely supply your office with the information required, on time, or if at all. This proves the 'slap dash' way in which SEL is being run. I do not know if you are aware, but it is rumoured that for 3 weeks over June/July SEL we're forced to run 24/7 on their largest Generator, as both the workhorse Generators were out of action, and the Smallest Generator is not capable of supplying the base load at this time of year. If that Large Generator had failed Sark would have been in a dire situation at one of its busiest times of the year! That's hardly the way to run an essential service - just relying on luck to see you through!

I cannot understand why SEL have not installed a new generator! The existing ones are double passed their life expectancy and cannot be running efficiently or cost effectively. The purchase cost would have soon been covered with the savings on Diesel.

Once again I thank you for your endeavours and await your determination coming to fruition.

A resident

22. Bravo! I all for it.

A resident

23. Thank you for circulating your draft Determination.

I note your reference to discounts being given to some customers by SEL:

'On 19th July 2022, Sark Electricity Limited (SEL) set a standard tariff of 74 p/kWh for electricity from 1st August 2022. I am aware that the £40 monthly minimum usage charge is



still being applied and that large discounts are given to heavier consumers of electricity, ranging from 12 to 19 p/kWh.'

With both my Chief Pleas and CEO of SEM hat on at the same time I thought it might be helpful for me to inform you and my fellow Conseillers that none of the properties under my direct management, be they domestic or commercial, receive any form of a discount on electricity charges. It may be that there are leaseholders across the estate who have negotiated a discount with SEL, although I struggling to think who this might be, but this would of course be an arrangement between them and SEL and not something I would be party to. The same may be the case with those who rent either domestic or commercial properties from us.

I trust all recipients of this email will accept it in the manner it is sent. The estate will quite reasonably be seen by most people as being one of the heaviest consumers of electricity in Sark. I merely wish to confirm that despite this, we do not receive any discounts, large or otherwise.

An Estate Manager