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RIIO.T1 Consultation Ofgem

**JOHN MUIR TRUST**  
**ASSOCIATION FOR THE PROTECTION OF RURAL SCOTLAND**  
**ADDITIONAL RESPONSE TO OFGEM RIIO-T1 INITIAL PROPOSALS**

Thank you for the opportunity to comment on the Ofgem RIIO-T1 proposals. The John Muir Trust has already submitted a joint response with the Campaign for the Protection of Rural England, the Campaign for National Parks and Friends of the Peak District. This letter covers issues pertaining to the Scottish landscape that also need to be addressed before the allowance is set for the price control period.

- The publication of possible candidate projects is a welcome start, but no projects have yet been identified for Scotland where the fast tracking of transmission schemes has resulted in fewer opportunities for engagement and consultation with stakeholders. A similar list of possible candidates needs to be sought from the Scottish Transmission Operators (TOs). The Trust would be willing to work with the Scottish TOs to identify potential projects via an agreed timescale and approach; however, Ofgem may need to give strong encouragement to the TOs to engage as the 'use it or lose it' approach has hitherto been an insufficient incentive.

- Scotland would appear to be off the pace, and as a consequence may not receive its fair share of the available allowance during the price control period. In order to rectify this, the Trust recommends that there should be a contingency allocation, explicitly ring-fenced for nationally designated areas in Scotland. Again the Trust would be willing to work with Ofgem to set this allowance and believes this should be progressed as soon as possible in order to avoid Scotland being further disadvantaged.

This submission is made on behalf of both the John Muir Trust ([www.jmt.org](http://www.jmt.org)) and the Association for the Protection of Rural Scotland ([www.ruralscotland.btck.co.uk](http://www.ruralscotland.btck.co.uk)).

We look forward to discussing with you how best to take these matters forward.

Yours Sincerely

John Mayhew  
**Director**  
**The Association for the Protection of Rural Scotland**

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