

Date: 09/02/2022

Reference: RIIO-ED2 Call for Evidence



Greater Cambridge Partnership
Shire Hall
Castle Hill
Cambridge
CB3 0AP

Dear Ofgem,

RE: Call for Evidence on Electricity Distribution Business Plans for RIIO-2

Stakeholder Feedback on UK Power Networks (Eastern Power Network region) RIIO-ED2 Plan

The Greater Cambridge Partnership (GCP) brings together councils, business, academia, and local communities to support and deliver the creation of 44,000 new jobs, 33,500 new homes and 420 additional apprenticeships in the Greater Cambridge region. The GCP is the delivery body for a £500 million City Deal agreed with Government in 2015 – mainly focused on delivering new infrastructure to support sustainable transport, including an electric bus fleet.

The GCP has worked closely with UK Power Networks to outline the drastic need for investment in additional Extra High Voltage (132kV and 33kV) infrastructure around the east and south of Cambridge, to facilitate the levels of growth in both housing and industrial demand. This work has been supported by three independent studies¹ into the local network capacity and demand forecasts. Each of these three reports demonstrated the critical need to increase EHV network capacity significantly, by at least 100MVA² with the following minimum infrastructure being required to be deployed as soon as possible:

- A new 132/33kV Bulk Supply Point substation at Cambridge East Grid
- A new 33/11kV Primary Substation at Trumpington

GCP wishes to support UKPN's case for these major projects within their RIIO ED2 business plan.

We believe that investment in these substations is overdue, and that the capacity released will be highly utilised by the burgeoning levels of development in the area, thus creating an efficient investment from a bill-payer's perspective.

We are pleased that UKPN have engaged with GCP and included these two schemes in their ED2 business plan, and strongly support their inclusion within UKPN's ED2 delivery programme.

¹ [Redacted].

² [Redacted].

We would also like to provide a stakeholder view on the ED2 settlement process itself. The funding allocation process appears, from an external perspective to be fairly opaque. We note that UKPN themselves have redacted all details of specific schemes from their business case, and therefore if funding is awarded it is unclear to us whether it will be tied to a specific scheme.

We would strongly urge Ofgem to consider the use of time-bound and ringfenced funding allocations for major EHV projects where there is a significant needs case, as for the two projects above.

We believe it would seriously enhance the transparency of the RIIO funding process and give stakeholders like ourselves confidence that the support that we lend to specific schemes with very clear regional purposes cannot be used to increase allowed revenue for the DNO without any firm commitment to deliver the specific scheme within a timely fashion.

We thank you for the opportunity to engage in the process and will be attending the UKPN hearing.

Yours,

A handwritten signature in black ink that reads "Rachel Stopard". The signature is written in a cursive style with a horizontal line underneath the name.

Rachel Stopard
Chief Executive
Greater Cambridge Partnership