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President Ben Fogle Chief Executive Kathy Moore

6-7 Barnard Mews London SW11 1QU
Telephone 020 7924 4077
Fax 020 7924 5761
Email info@cnp.org.uk
Web <http://www.cnp.org.uk>

Electricity Distribution
Office of Gas & Electricity Markets
2nd floor
9 Millbank
London
SW1P 3GE

Sent by email: DPCR5.reply@ofgem.gov.uk

Electricity Distribution Price Control Review Initial Proposals 92/09 and 93/09

The Campaign for National Parks (CNP) welcomes the opportunity to respond to the above consultation. CNP is the national charity which campaigns to protect and promote National Parks for the benefit and quiet enjoyment of all.

Undergrounding in National Parks

CNP welcomes Ofgem's commitment to retain the allowance for network undergrounding in National Parks and Areas of Outstanding Natural Beauty. The allowance has benefitted a number of National Parks where significant improvements have been made to the visual amenity of the landscape.

Voltage cap

CNP welcomes and supports Ofgem's proposal to remove the voltage caps – these were impeding progress on many lines that ought to have been a high priority for action because of their intrusiveness.

Voluntary nature of the scheme

CNP supports the voluntary nature of the scheme and understands that the scheme should be driven by stakeholders rather than Ofgem. However, we would appreciate Ofgem's continuing commitment to encouraging all DNO's to participate in the scheme, particularly in areas in which stakeholders express support for the scheme but the DNO chooses not to participate. There are a number of important principles which DNOs could be encouraged to adopt when operating the scheme:

- Committing to undergrounding both village LV networks and open countryside HV lines and not ruling out the latter as a policy decision at the start of the price control period
- Working with key stakeholders in a transparent and open way – nominating specific staff leads will help to deliver the scheme's outcomes and provide an effective interface with stakeholders
- Regular meetings with stakeholders on schemes, their priority and progression will help to ensure that the benefits of the allowance are maximised

New lines and boundary issues

CNP is disappointed at the proposal that newly built lines should fall outside the scheme. The allowance could be used to help to underground potentially intrusive new lines by funding the difference between the cost of overhead provision and undergrounding. CNP urges Ofgem to reconsider this proposal.

CNP is also disappointed that Ofgem proposed not to include lines that although outside a National Park boundary would have an adverse impact upon its setting. CNP does not agree that this would add confusion to the scheme. Relevant authorities already have a statutory duty to have regard to National Park purposes when carrying out activities that might affect a National Park. Extending the allowance to cover such lines would enable some of these to be undergrounded where there was a demonstrable benefit to the setting of the National Park.

Interaction with DPCR4

CNP welcomes Ofgem's proposal to change the definition of the point of completion of undergrounding. However, we are concerned about the proposed definition and ask that you take the Friends of the Lake District's comments into consideration on this point.

Calculations of the allowance

Table 9.1 provides details about the calculation of allowances for each DNO. Is any scope for alterations to these allowances to be made at any point throughout the price control period? A review is currently being carried out into the boundaries of the Lake District and Yorkshire Dales National Parks. This could affect the number of customers and the length of overhead lines within these Parks, and therefore the allowance allocations.

In March 2009 the Government announced that it would confirm the designation order for the South Downs National Park. This is expected before the end of 2010. The National Park will include land not currently within the two existing AONBs and it could therefore affect the allocation for this area.

Please do not hesitate to contact me should you require clarification of any of the above.

Yours sincerely



Amy Peters
Senior Policy Researcher