

DPCR5 Response
Electricity Distribution
Office of Gas & Electricity Markets
9 Millbank
London
SW1 3GE

Natural England
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Lewes
East Sussex
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Monday 14th September 2009

Dear Sir / Madam

Electricity Distribution Price Control Review Initial Proposals – Incentives and Obligations: Ref 93/09

I am writing on behalf of the steering group of the Undergrounding of Overhead Lines in Protected Landscapes Project; a group chaired by Natural England with the support of a dedicated EDF Energy Networks project officer and with representatives from the protected landscapes of the South Downs, Dedham Vale, High Weald, Norfolk Coast, The Broads, Suffolk Coast, Kent Downs, Surrey Hills and The Chilterns.

Thank-you for giving the group the opportunity to respond to your initial proposals for the EDPCR. The steering group met on September 8th to discuss their response to this consultation.

Due to the focus of the group our comments are restricted to Chapter 9 of the consultation paper 93/09

9.1 Retention of the allowance

The group with the support of EDF Energy Networks has undertaken many undergrounding schemes in protected areas during DPCR4 and has received many positive responses to our work from the public and partners and therefore we are extremely pleased that the allowance will continue into DPCR5 and will enable us to continue to support and undertake this

important work. The group would like to thank Ofgem for their input into making this scheme a success.

9.4 Removal of Voltage Caps

The proposal to remove the caps on the allowance by voltage bands is also welcomed by the group. This will allow us to operate with a more flexible and targeted approach when deciding which projects will have the greatest landscape benefits.

9.5 Voluntary nature of the scheme

The members of the group - and the landscapes they represent - have received a lot of positive support from EDF Energy Networks in the EPN and SPN areas. We are aware how fortunate we are to have a close working relationship with EDF Energy Networks and, due to the successes we have achieved, are disappointed that the continued voluntary nature of the scheme may mean that other areas of the country do not receive the same level of support.

The group hopes that Ofgem will continue to encourage other DNOs to make a similar contribution to the enhancement of protected landscapes.

9.7 Project Officer

The contribution that EDF Energy Networks have made through funding a project officer to support the group has been vital in enabling the group to deliver its outcomes. The role of the project officer gives an important technical steer to the group – knowledge the group would otherwise lack. This input improves efficiency at every stage of the process from the identification of potential schemes right through to the undergrounding of the lines. The project officer's input means our work is more targeted and our goals more realistic meaning that schemes are delivered on time and to budget.

From our positive experiences we would disagree with the statement within the document that a project officer is not a vital part of the scheme and should therefore not be funded by the allowance.

9.10 Lines outside the boundaries of national parks and AONBs

The group had hoped that the flexibility granted to other aspects of the scheme would have also been applied to this issue.

Our members are able to give examples of schemes which have not been able to achieve their full potential or have been abandoned due to the exclusion of lines which continue outside the protected landscape boundary.

For this reason the group would welcome greater flexibility on this issue.

9.12 Interaction with DPCR4 scheme

The group warmly welcomes the decision to change the definition of the point of completion of undergrounding work

I hope the comments of the group are of assistance and I'd like to once again take this opportunity to thank Ofgem for their role in the promotion of a scheme which continues to have a positive effect on our landscape and the many people who value it.

Yours sincerely,

A handwritten signature in black ink on a light-colored background. The signature consists of the letters 'M.B.' followed by a long, sweeping horizontal stroke that ends in a small upward flick.

Michael Blencowe

Chairman, Undergrounding of Overhead Lines in Protected Landscapes Project