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Dear Ms Fletcher

Annual stakeholder report on electricity distribution

As you may know Friends of the Lake District (FLD) is a registered charity, established in 1934, with the objects of protecting and conserving the landscape of the Lake District and Cumbria. We have approximately 7000 members, represent the Campaign to Protect Rural England in Cumbria and are members of the Campaign for National Parks.

We would like to congratulate Ofgem on deciding to produce a more customer friendly annual report on electricity distribution and welcome the opportunity to comment on its content. We only wish to respond in relation to the allowance for undergrounding the network in National Parks and Areas of Outstanding Natural Beauty (AONBs).

Throughout the discussions we have had with Ofgem with regard to this allowance it has always been emphasised to us that the reasons it has been agreed are customer willingness to pay (as demonstrated in the survey work carried out by Ofgem) and stakeholder endorsement (in this case largely environmental organisations with an interest in landscape conservation and enhancement). Thus it seems illogical that a measure to monitor progress is not included in the annual stakeholder report, which is likely to be the only report that both customers and such stakeholders refer to.

The most recent quality of service report annual report (Ref: 162 / 09) provided information on expenditure and kilometres removed by DNO over 4 years (Table 7). I am sure that a customer who was asked in the survey work "What do you think about putting overhead lines underground in national parks and areas of outstanding natural beauty" would hope to see comparative information provided on each National Park and AONB within each DNO area i.e. expenditure and lengths placed underground compared to allowance available and total length of line in each designated area.

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friends OF THE LAKE DISTRICT

In addition such information provided in a non-technical annual report would provide a useful comparative tool for both National Parks and AONBs to measure their performance in relation to each other and as part of their own reporting mechanisms.

We believe such information could only be provided through an Ofgem generated report as FLD 's experience as an interested stakeholder is that attempting to acquire comparable data from individual DNOs simply does not work.

I hope you find these comments useful and Ofgem is able to provide information as described above in an annual stakeholder report.

Yours sincerely

Penny Ozanne

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