

Rachel Fletcher
Director – Distribution
Office of Gas & Electricity Markets
9 Millbank
London
SW1 3GE

By e-mail to: rachel.fletcher@ofgem.gov.uk

21 January 2010

Dear Ms Fletcher,

Annual stakeholder report on electricity distribution

As you may know Friends of the Peak District (FPD) is a registered charity, established in 1924, with the vision of a living, working Peak District that changes with time but remains beautiful forever. We have approximately 1500 members, represent the Campaign to Protect Rural England in the Peak District and are members of the Campaign for National Parks.

We are pleased that Ofgem are set 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 that amenity groups (such as ourselves and Friends of the Lake District, FLD) have had with Ofgem with regard to this allowance, it has always been emphasised to us that the reasons it exists are customer willingness to pay (as demonstrated in customer research) and stakeholder endorsement (in this case largely amenity groups with an interest in landscape conservation and enhancement). It is therefore illogical that a measure to monitor progress in respect of the monies spent by the DNOs is not included in the annual stakeholder report, which is likely to be the only report that both customers and such stakeholders refer to.

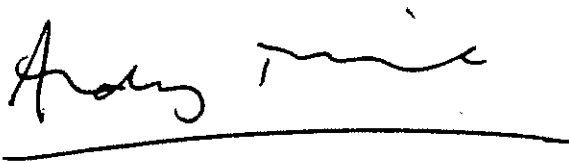
The most recent quality of service report annual report (Ref: 162/09) provided information on expenditure and kilometres removed by DNOs over 4 years (Table 7). I am sure that a customer (who was asked in the survey work "What do you think about putting overhead lines underground in national parks and 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).

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

We hope you will be able to implement this suggested amendment.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Tickle', written over a horizontal line.

(Dr) Andrew Tickle
Deputy Chief Executive/Head of Planning & Campaigning