

Hannah Nixon  
Transmission and RPI-X@20  
Office of Gas and Electricity Markets  
9 Millbank  
London  
SW1P 3GE



6 September 2010

Dear Ms Nixon

**Re: Regulating energy networks for the future: RPI-X@20 Recommendations**

The English National Park Authorities Association (ENPAA) exists to support the policy making process by co-ordinating the views of the ten English National Park Authorities. It is governed by the Chairs of the ten Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs). We work closely with the Welsh Association for National Park Authorities which provides a similar function for the three Welsh NPAs and this is a combined response.

National Park Authorities are a type of local authority, funded through Defra with statutory purposes as set out in the *Environment Act* 1995. They are charged with helping to look after England and Wales' National Parks. These are largely rural areas of the country that make up respectively 9.3% and 20% of England and Wales' land area. A significant aspect of NPA work is climate change mitigation and adaptation, which includes both land management activities and helping National Park communities move towards a low carbon future. In enabling this important climate change work, NPAs ensure that any actions taken are appropriate for protected landscapes and so do not compromise the special qualities of the area for which it was designated.

ENPAA welcomes Ofgem's consultation on its RPI-X@20 recommendations for the future regulation of energy networks. We are generally supportive of the recommendations and in particular welcome the recognition that wider environmental impacts need to be taken into account in the delivery of a sustainable energy sector.

We would like to make some specific comments regarding the outputs-led approach, as set out in recommendation 5 and Chapter 4 of the main consultation document and expanded on in the accompanying technical paper. As mentioned above, we support the inclusion of an environmental impact category and understand that the specific outputs required of network companies will be set out in the price control. The supporting document provides further detail in paragraphs 6.14 and 7.20. ENPAA supports the requirement for network companies to demonstrate the long-term costs and benefits of its proposals in terms of environmental impact. Where a network company's proposals would affect a National Park, we remind Ofgem of the duty under Section 62 of the *Environment Act 1995* for all relevant authorities to have regard to the purposes of National Parks in their decisions. These purposes are:

- to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and
- to promote opportunities for the enjoyment and understanding of its special qualities by the public.

**English National Park Authorities Association**

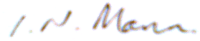
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We also note that work to provide a sustainable energy sector can include environmental enhancements, such as the careful undergrounding of overhead cables to reduce visual impacts through important landscapes. ENPAA recommends that these points are incorporated into the implementation of the new regulatory framework from the outset.

We are happy for this response to be made publicly available and would be happy to discuss any of the points we make further with officials if that would be helpful.

Yours sincerely

A handwritten signature in red ink that reads "I. Mann".

Iain Mann  
ENPAA Climate Change Project Officer