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16<sup>th</sup> March 2012

Dear Ms Fletcher

**Open Letter Consultation on the Way Forward for the Next Electricity Distribution Price Control Review – RIIO-ED1**

Friends of the Lake District (FLD) is a registered charity with more than 6,000 members. We represent the Campaign to Protect Rural England in Cumbria, and are a member of the Campaign for National Parks. Issues relating to the telecommunications industry have featured throughout our history. Recently we have been campaigning more actively to reduce the visual impact of overhead wires on the landscape.

We welcome this opportunity to respond to Ofgem on the way forward for the next electricity distribution price control review – RIIO-ED1. We are particularly interested in undergrounding, and therefore have views to share with you on the **review of DPCR5 mechanism** (pages 2-3 of your letter). We agree that the undergrounding allowance of DPCR5 is working well through a stakeholder based approach. Indeed we play an active part in the NW Undergrounding for Visual Amenity Steering Group (representatives from Electricity North West, National Parks, Areas of Outstanding Natural Beauty and Friends groups). The distribution network operator in our region takes on board the advice from environmental organisations about undergrounding priorities in the protected landscapes.

You pose the question: which of the DPCR5 outputs and incentives do you consider to be fit for purpose, or require minimal amendment, for RIIO-ED1? suggesting that the mechanism “undergrounding in areas of natural beauty could remain largely unchanged” (top of page 3) from DPCR5. We agree that “using a stakeholder based approach to visual amenity in Areas of Outstanding Natural Beauty or National Parks” (environment output of Annex 1, page 6) is a worthwhile output and we very much welcome the continuation of the allowance and all it is achieving.

But, we would like the review to look at extending and guaranteeing the allowance in several ways, as listed overleaf.

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1. As a minimum, the undergrounding allowance should be increased to enable undergrounding at other heritage sites, outside National Parks and Areas of Outstanding Natural Beauty, for example:
  - registered commons
  - registered village greens
  - Conservation areas
  - heritage sites (such as parkland of stately homes), as defined by English Heritage, Historic Scotland or Cadw
  - Heritage Coasts
2. Even better, if the allowance is increased substantially to enable undergrounding in the wider countryside, recognising that landscape can still be of high amenity value outside National Parks and Areas of Outstanding Natural Beauty.
3. The allowance should be extended to include new lines, not just existing lines that have been refurbished more than 15 years ago.
4. The allowance should become core business, rather than having to make the case each review period.
5. The allowance should become compulsory on the part of the Distribution Network Operators.

In summary, Friends of the Lake District believes that an allowance scheme to underground overhead electricity distribution lines should continue. We think it is a great scheme because: it supports the fulfilment of both Ofgem's and distribution network operators' environmental duties; it results in an improvement in the visual quality of some of our most highly valued landscapes; it addresses consumer concerns; and has shown considerable uptake by distribution network operators.

However, Friends of the Lake District believes it can be improved upon and would hope that the issues identified in this response can be addressed through RIIO-ED1, as well as consideration being given to extending the geographical coverage of the scheme.

We look forward to the opportunity to comment on the strategy this autumn.

Yours sincerely,

Amanda McCleery  
Overhead Wires Officer

