



Suffolk Coast & Heaths AONB
Dedham Vale AONB & Stour Valley Project
c/o Suffolk County Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

22nd November 2012

Hannah Nixon
RIIO ED1 Consultation
Ofgem
9 Millbank
London
SW1P 3GE

BY EMAIL

Dear Ms. Nixon

Strategy consultation response to the RIIO ED1 electricity distribution price control

Please note we have concentrated on Chapter 5 (specifically question 3) as this seems the most relevant to our work, though some answers may also be relevant to Chapter 3 (stakeholder engagement).

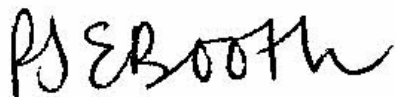
We strongly support the continuation of an allowance for undergrounding of overhead wires in AONBs and National Parks. We welcome the intention to extend the price control period to 8 years. In the context of delivering undergrounding schemes, an 8 year period gives greater opportunity to plan and implement schemes. It will help regarding carrying over of funds and provides stability. We recommend the continuation of existing flexibility whereby, as long as new underground cable is operational, the redundant overhead lines and removal of poles can take place outside the period. This is particularly relevant in the final year of any review period.

We consider that the stakeholder engagement with environmental specialists from AONBs and National Parks, as demonstrated by UKPN in the east and

south east regions, is the most appropriate way to identify and deliver successful undergrounding schemes. Any changes to the allowance (as suggested in paragraph 5.30) should include the retention of this close stakeholder engagement to ensure the best possible landscape and community benefit in protected landscapes.

We urge Ofgem to consider how the distribution network on metal towers can be addressed in terms of undergrounding in National Parks and AONBs. The level of allowance in DPCR5 is not sufficient to underground this element of the distribution network as the cost of dismantlement is so high. The proposed allowance to underground the transmission network on metal towers will of course only be available to transmission operators. In order for the best possible benefits within our protected landscapes, it is essential that this anomaly is addressed through an increased level of funding within RIIO ED1 to deliver undergrounding schemes on all voltage levels of the distribution network.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Booth'.

Paula Booth
Planning and Development Officer

Dedham Vale AONB & Stour Valley Project and Suffolk Coast & Heaths AONB