

Response received by email from Broads Authority

Dear Madam

RIIO-ED1 consultation

I am writing in response to the above consultation. The comments below relate to

Chapter 5. Ensuring output delivery

Question 1: Do you consider that the proposed outputs and associated incentive mechanisms, taken together with other elements of the price control, will ensure that companies deliver value for money for consumers, and play their role in delivering a sustainable energy sector?

Question 2: Do you consider that the proposed outputs and incentive arrangements are proportionate (e.g. do we have too many or too few)?

Question 3: Do you have any views on the proposed outputs and incentives?

In particular *Other environmental impacts*

5.30. The DPCR5 allowance for undergrounding of overhead lines in Areas of Outstanding Natural Beauty and National Parks, with activities prioritised by local groups, has strong stakeholder support and we intend to retain it with few changes.

Broads Authority comments:

The Authority strongly supports the continuation of an allowance for undergrounding of overhead wires in AONBs and National Parks. Through the expenditure of the allowance the Authority and UK Power networks have achieved significant landscape enhancements which have had full support by local organisations and individuals.

We support 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 and provides a greater level of security for project delivery. We assume that the allowance will increase proportionally.

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. (see attached information). 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.

Incentives to delivery – It would be helpful if information relating to the expenditure of the allowance by the individual distribution networks is provided spatially (per AONB and National Park boundaries) and numerically, in order that overall delivery of allowance expenditure in England can be easily reviewed and where necessary our respective protected landscape groups could use as information to promote the development of projects in particular areas.

Yours sincerely

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