

RIIO-ED1: Strategy consultation for the RIIO-ED1 electricity distribution price control

Response by South East and Eastern Undergrounding Steering Group

The South East & East of England Undergrounding Steering Group, comprising 9 protected landscapes and chaired by Natural England, has the following comments. 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 apply 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.
- 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 encouraged by interested parties.
- 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.

Natural England (Independent Chair), UK Power Networks Project Officer, Suffolk Coast and Heaths AONB (Eastern Voting Member); Dedham Vale AONB and Stour Valley Project (Eastern Voting Member); Norfolk Coast Partnership (Eastern Voting Member); Broads Authority (Eastern Voting Member); the South Downs National Park Authority (Southern Voting Member); Kent Downs AONB (Southern Voting Member); Surrey Hills AONB (Southern Voting Member); High Weald AONB (Southern Voting Member), the Chilterns Conservation Board (Eastern Voting Member)

