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Ms A Rossington
RIIO-ED1
9, Millbank
London
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Dear Ms Rossington

RIIO-ED1: Electricity Distribution Networks Operators' (DNOs) business plans – publication, views and next steps

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 overhead wires and the telecommunications industry have featured throughout our history. Recently, we have been campaigning more actively to reduce the visual impact of all overhead wires on the landscape.

We work closely with Electricity North West (ENW) as the DNO for Cumbria. We attend the quarterly Undergrounding for Visual Amenity Steering Group meetings that ENW host. Between meetings, we liaise with ENW and National Park and Area of Outstanding Natural Beauty (AONB) staff over specific schemes. For these reasons we are giving you our views on the undergrounding section of ENW's business plan. In so doing, we are answering your questions on its overall quality and stakeholder engagement.

Overall quality of the plans

Do you consider that the plans are comprehensive and well-justified? Do they provide a clear understanding of what the DNO will deliver over the price control period?

Yes. We consider that ENW's business plan is comprehensive and well-justified with respect to undergrounding. It does provide clear understanding of the total length of overhead line (80km) that ENW will underground over the price control review period. It also states the total cost of £9 million. These figures are taken from page 30 of the main document.

Do the plans include all relevant information necessary for you to understand the impact of those plans on your interests?

Possibly not. It would be useful for ENW to break this total cost down according to National Park and AONB in its Appendix 13 in order for FLD to understand more fully the length of line that will be undergrounded in each National Park and AONB.



Stakeholder engagement

Have the views you provided to the DNOs been reflected in their plans? If not, has the DNO explained why?

Yes, in ENW's overall commitment to undergrounding but some detail on how they could support stakeholders is possibly missing.

Importantly, our view - that ENW should use the full Ofgem undergrounding allowance under RIIO-ED1 – is reflected in its business plan. This reflects successful partnership working between ENW and landscape organisations, under the current DPCR5, to implement undergrounding schemes. It means that the visual impact of electricity poles and wires on protected landscapes in the north west will continue to reduce for the next decade which is fantastic news.

We agree with what ENW has written in Annex 13 on “Undergrounding for Visual Amenity Scheme”, though the document may benefit from some sort of flow chart to help illustrate the undergrounding process (from identification of a potential scheme to site restoration on completion of the scheme).

I wrote to you on 18th November 2012 (about the strategy consultation for RIIO-ED1: Outputs, Incentives and Innovation – Supplementary Annex) about how FLD supports Ofgem's proposal that DNOs produce a policy on their approach to supporting interest groups. This is particularly pertinent, as National Park/AONB staff time for proposing, assessing and monitoring projects is decreasing, with public sector budget cuts. FLD sent ENW information on contribution to salaries, travel costs and regional co-ordinators. It would have been useful to have seen this in their business plan, as well as a possible format for stakeholders to request support (eg. grant application form, percentage of staff time agreed in advance).

Do you consider that the plans reflect the interests of both existing and future consumers?

It is for consumer organisations – not FLD – to comment on whether the plan reflects consumer interests. But, certainly the undergrounding allowance offered by Ofgem, to ENW under RIIO-ED1, is based on an Ofgem “willingness to pay” survey of consumers and ENW are keen to use the full allowance.

In summary, we commend the undergrounding section of ENW's business plan to you. As an organisation, we will support and encourage ENW all we can to achieve their far reaching “aspiration to fully spend our programme entitlement in RIIO-ED1” (taken from Annex 13, page 3) for undergrounding.

We hope you will take our comments into account. If you have any queries or seek further information, do not hesitate to contact us.

Yours sincerely,

A handwritten signature in blue ink that reads "Amanda McCleery". The signature is written in a cursive style with a light blue background behind it.

Amanda McCleery

Ovehead Wires Project Officer