



9th May 2013

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Dear Ms Rossington

RIIO-ED1: Electricity Distribution Networks Operators' (DNOs) resubmitted 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

We still feel that ENW's business plan is comprehensive and well-justified with respect to undergrounding. We believe that 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.

More information has been given in this revised business plan about how the total length undergrounded breaks down according to National Park and AONB and this is welcome. However, it would be useful to see as well how the total cost of £9 million for undergrounding during RIIO-ED1 breaks down according to National Park and AONB. This would help ensure that sufficient staff time from protected landscape organisations is given to undergrounding schemes, at a time when staffing levels are being reduced.



Reflecting what customers value/stakeholder engagement

FLD's views, namely that ENW should commit to spending all Ofgem undergrounding allowance during RIIO-ED1, is still reflected in this revised plan. Furthermore, this plan now makes several direct references to working with stakeholders: "we worked with our stakeholders to establish a programme of undergrounding for visual amenity...a model of public-private partnership working...we plan the programme in full consultation with the relevant authorities and other stakeholders" (ENW Revised Business Plan, p.84). It is, of course, for consumer organisations – not FLD – to comment on whether the plan reflects consumer interests.

We welcome the fact that undergrounding appears to have a higher profile in this revised business plan as it is mentioned several times before its specific pages. The Executive Summary states that "our network passes through some of the most breathtaking landscapes in the country. Some of our stakeholders would like us to run as many of our cables as possible underground" (ENW Revised Business Plan, p.12). In the Introduction to Section 4 Outputs, it explains that with undergrounding "the measure is based on the activity we plan to undertake to achieve the ultimate (but difficult to measure) benefit (eg. improvement in visual amenity" (ENW Revised Business Plan, p.53). It is encouraging to hear a private company acknowledge that the benefits of removing wire clutter can be hard to quantify and yet are nevertheless worth doing for the improvement to the landscape.

I repeat something that I wrote in my letter to you of 24th July 2013 (FLD's response to ENW's original business plan). I said that FLD supports Ofgem's proposal that DNOs produce a policy on their approach to supporting interest groups (my letter to you of 18th November 2012 about the strategy consultation for RIIO-ED1).. 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 revised business plan, as well as a possible format for stakeholders to request support (eg. grant application form, percentage of staff time agreed in advance).

In summary, we commend the undergrounding section of ENW's revised 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 their programme entitlement in RIIO-ED1 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,



Amanda McCleery
Overhead Wires Project Officer

