Friends of the Peak District's comments on "Electricity Distribution Networks Operators' resubmitted business plans"

12 May 2014

Anna Rossington Head of RIIO-ED1 OfGEM 9 Millbank London SW1P 3GE 37 Stafford Rd Sheffield S2 2SF

Dear Ms Rossington

Friends of the Peak District (FPD) is the registered national park society for the Peak District National Park and is part of the Campaign for National Parks. We have over 1100 members and we are run and managed by the Peak District and South Yorkshire Branch of the CPRE.

FPD is grateful to OfGEM for this opportunity to comment on the resubmitted business plans of the Electricity Distribution Network Operators. As there are only two of these DNOs that cover parts of the Peak District we have limited our comments to those two DNOs – Electricity North West Ltd (ENWL) and Northern Powergrid (NPg).

This letter follows on from our earlier comments on the DNOs' Business Plans submitted at the end of July 2013 in which we supported the Business Plans proposed by ENWL and NPg but criticised WPD's Business Plan and also our comments submitted in January 2014 on OfGEM's assessment of these initial business plans.

ENWL and NPg

FPD repeats its support for ENWL's intention to invest the full OfGEM allowance of £10million and for NPg's intention to invest the full OfGEM allowance of £15million during the RIIO-ED1 period for undergrounding power cables in National Parks and Areas of Outstanding Natural Beauty.

Both ENWL and NPg set out target lengths of cable to be undergrounded (80km and 100km respectively). FPD considers that dual targets – expenditure and length – may cause conflicts as some of the most intrusive overhead cables may pass through areas where it is technically very difficult to put them underground. The level of visual impact should be the deciding factor rather than the cost per kilometre. FPD

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proposes that, in its licences for these DNOs, OfGEM should adopt the financial expenditure as strict requirements and not refer to any length targets.

Please do not hesitate to contact us if you have any queries or wish to clarify any of our comments.

David Allwood Volunteer UVA Surveyor

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