

Friends of the Peak District's comments on OfGEM's "RIIO-ED1: Draft determinations for the slow-track electricity distribution companies"

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Anna Rossington
Head of RIIO-ED1
OfGEM
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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 its draft determinations for the slow-track electricity distribution companies. 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 in May and January 2014 and in July 2013.

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

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Finally, FPD hopes that OfGEM's licence conditions for these, and all other, DNOs will not place any constraints on the timing of expenditure on undergrounding power cables. FPD believes that the DNOs should be free to implement undergrounding schemes as soon as agreement has been reached with the appropriate stakeholders subject only to not exceeding the full OfGEM allocation for this work.

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

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