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Our ref

Your ref

Date

2 December 2015

Dear Amy

**Statutory Consultation on the RIIO-ED1 Environment Report Guidance Document (ERGD) – Representation**

I am writing on behalf of Western Power distribution (East Midlands)plc, Western Power Distribution (West Midlands)plc, Western Power Distribution (South Wales) plc and Western Power Distribution (South West) plc to make a formal representation in response to the above consultation.

Paragraph 1.7 of the guidance misrepresents the scope of the ERGD as defined in the licence condition or the Strategy Decision Document and needs to be redrafted to reflect the body of the guidance which does reflect the licence condition.

SLC47 is a requirement to publish an annual Environment Report about activities that a DNO has undertaken in relation to environmental matters. The ERGD scope is to set out how the licensee must report on activities that it has undertaken in relation to environmental matters, including the following:

- (a) the requirements for the structure of and level of detail in the report; and
- (b) the policies, business practices, existing obligations and activities that must be covered in the report.

In particular, there are no requirements to set environmental targets, to engage with stakeholders, or (apart from in relation to losses) to reduce environmental impact to a level as low as reasonable practicable or to integrate environmental protection and enhancement. The wording in 1.7 effectively introduces these requirements, as DNOs are required to comply with the guidance.

However the body the ERGD does reflect the reporting requirements of the licence condition.

## Proposed redrafting:

1.7 DNOs' Reports must be clear and well structured, outlining ~~clear targets~~ **the activities undertaken in relation to environmental matters** ~~and the route for involvement and engagement for stakeholders~~. DNOs should use the Report to demonstrate to stakeholders what steps they have taken to **manage** ~~reduce~~ their environmental impact ~~to a level as low as reasonably practicable and demonstrate their progress towards integrating environmental protection and enhancement into their businesses~~.

The above redrafting would be a better reflection of SLC47 and the actual reporting requirements detailed in the main part of the ERGD.

If you wish to discuss this further please contact Natasha Richardson at [nrichardson@westernpower.co.uk](mailto:nrichardson@westernpower.co.uk) or on 0117 9332382.

Yours sincerely



ALISON SLEIGHTHOLM  
Regulatory & Government Affairs Manager