

To Whom It May Concern

**Consultation on RIIO-ED1 Innovation Roll-out Mechanism Submissions
UK Power Networks - LV Network Visibility and Control**

I write on behalf of the Greater Cambridgeshire and Greater Peterborough Local Enterprise Partnership and I am very pleased to have the opportunity to respond to the consultation on UK Power Networks' RIIO-ED1 Innovation Roll-out Mechanism Submission.

Having met UK Power Networks in person and studied their proposals, I am confident that this investment will reap dividends in supporting our purpose to drive forward sustainable economic growth in the region.

Question 1: *Do you consider that any of the proposed roll-out will facilitate the Government's Carbon Plan and/or deliver wider environmental benefits?*

One of the critical challenges that we face is building the evidence base to demonstrate how demands on the electricity network are changing with the rise of low carbon technology.

We believe that UK Power Networks proposal marks a hugely important step forward in furthering our understanding by collecting data on this issue and better pinpointing long-term investment for economic growth. This will ultimately deliver carbon and environmental benefits.

Question 2: *Do you consider that any of the proposed roll-outs will deliver long-term value for money to customers?*

I believe that any new activity in this area will create much more robust evidence base for innovative delivery of local energy ultimately drive down costs and provide better access for customers.

Question 3: *Do you consider that any of the roll-outs will allow the licensees to receive commercial benefits within the price control period, i.e. will the roll-out lead to cost savings and/or incentive rewards, greater than the cost of the roll-out within the price control period?*

No comment on this question.

Question 4: *Do you consider that the technologies that SPEN and UKPN wish to roll-out fall within the definitions of a Proven Innovation or Ordinary Business Arrangement as defined in the IRM licence condition?*

No comment on this question.

Question 5: *What are your views on the merits of any of the proposed technology roll-outs?*

- *To what extent are the proposed roll-outs relevant to current and future challenges in relation to the distribution network?*
- *What improvements, if any, do you consider that the proposed technology roll-outs offer compared to the current situation?*

The need for diversification and evolving technologies is absolutely necessary to facilitate greater local delivery of energy. The lack of data and information creates uncertainty and prohibits accelerated delivery. UKPN's proposal will greater insight and facilitate greater uptake.

Question 6: *What are your views on the timing of the proposed roll-outs?*

- *What would happen if any of the proposed roll-outs didn't occur until the next distribution price control starting in 2023?*
- *Does the timing of any of the proposed roll-outs have a significant effect on the expected level of benefits?*

The need for knowledge-based action is now, some might say already too late. Nonetheless these actions cannot wait any longer. Visibility and control in our area is essential to remove barriers currently prohibiting EV charging delivery for example.

Question 7: *To what extent will the proposed roll-out facilitate the Carbon Plan?*

- *Please explain what aspects of the Carbon Plan you consider the proposed roll-out will facilitate.*
- *What is your view of the claims made by the licensees regarding the contribution the proposed roll-out will make to these aspects of the Carbon Plan?*
- *Will any of the proposed roll-outs deliver benefits more quickly than the business as usual methods used across Great Britain (GB)?*

The proposed roll-out will facilitate greater delivery of local energy solutions, which by their virtue will come at a lower carbon cost.

Question 8: *To what extent will the proposed roll-out deliver wider environmental benefits?*

- *Please explain what, if any, environmental benefits you consider the proposed roll-outs will deliver.*
- *What is your view of the claims made by the licensees regarding the environmental benefits their projects will deliver?*
- *Will any of the proposed roll-outs deliver benefits more quickly than the business as usual methods used across GB?*

There are many indirect environmental benefits to be secured by the proposed roll out. Many will be derived from a greater understanding achieved by data awareness and management. This in turn will enable UKPN and stakeholders in the area to better plan and deliver the necessary infrastructure.

Question 9: *To what extent will any of the proposed roll-outs deliver value for money to consumers?*

- *Please explain whether you consider the cost and scale of any of the proposed roll-outs is justified in relation to the benefits each will deliver.*
- *What proportion of the potential benefits from the proposed roll-outs do you consider will accrue to the network compared to other elements in the energy supply chain?*

Generally speaking any enhanced analytics and data management that gives knowledge and insight will ultimately provide enhanced value for money for consumers.

Question 10: *With reference to the IRM licence condition, do you have any significant concerns about funding any of the proposed roll-outs under the IRM? For example, do you consider it is reasonable to expect the licensee to carry out the work anyway as part of business as usual?*

Our area is currently home to 1.3 million people, 700,000 jobs, 60,000 enterprises and we generate £30 billion per annum. I would urge you to note the support of business and enterprise and hope this important project can progress.

Yours faithfully



Paul Bourgeois – Head of Sustainability and Local Energy East project lead

Date: 25th July 2017