

Consultation on the draft RIIO-ED1 Environment Report Guidance Document
Email – sent Tue 24/02/2015 13:28

Dear Sir/Madam

Background – I work for the landscape charity Friends of the Lake District (FLD) which actively campaigns to reduce the visual impact of all overhead wires on the landscape. I work with the Distribution Network Operator (DNO) in our region, Electricity North West, National Parks and Areas of Outstanding Natural Beauty (AONBs), on specific undergrounding schemes.

Having read the draft Guidance document, I feel that the guidance is both clear and comprehensive with respect to visual amenity (within “managing our environmental impact” section) which will be the area of the Environmental Report that will be of interest to FLD.

My main concern is how, if at all, individuals and organisations will be able, in the future, to compare and contrast National Parks, Areas of Outstanding Natural Beauty and indeed DNOs across the country with respect to percentage of undergrounding allowance spent and length of line undergrounded each year. Currently (under DPCR5) such comparison is possible (albeit a year or more later) through Ofgem’s annual reporting process by which a spreadsheet of expenditure and line length removed (broken down by DNO, National Park and AONB) is produced. It is not clear whether such annual reports and spreadsheets will still be produced by Ofgem under RIIO-ED1 or whether Environmental Reports by each DNO will replace this reporting mechanism. Friends of the Lake District feel strongly that these annual reports by Ofgem for the country as a whole should continue under RIIO-ED1.

I look forward to hearing from you in due course.

Amanda McCleery

Overhead Wires Project Officer

Friends of the Lake District - *Protecting Cumbria's Landscapes for future generations*