

30th September 2015

Ms Clothilde Cantegreil
Ofgem
9, Millbank
London
SW1P 3GE

Dear Ms Cantegreil

Open Letter Consultation on How to Report on Electricity Distribution Company Performance

Friends of the Lake District (FLD) is a registered charity with more than 6,000 members. We represent the Campaign to Protect Rural England in Cumbria and are a member of the Campaign for National Parks. We actively campaign 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.

Thank you for giving stakeholders this opportunity to comment on what information Ofgem and DNOs make publically available during RIIO-ED1 and the appropriate level of detail and format. I will respond to your questions of content, publication split and timings in turn.

Content – Friends of the Lake District values information detailing the amount of undergrounding that is achieved each year, both in terms of total length of line (km) and cost (£). It is useful to see this information given for each National Park and Area of Outstanding Natural Beauty but also for each DNO which allows for a comparison at both a protected landscape and a regional electricity distribution company level.

Publication split – Friends of the Lake District feels strongly, as an organisation that lobbies on landscape matters at a national level, that the publication of the undergrounding information should remain with Ofgem and not be moved to the DNOs. Only this way will it be straightforward to compare and contrast the undergrounding performance of the different DNOs across the country. It is unreasonable to expect national organisations, such as ourselves, to find the relevant undergrounding sections within 8 or more company annual reports and then piece together a regional picture.

Timings – Friends of the Lake District would urge Ofgem to continue to publish this undergrounding information annually. It needs to be publically available as soon as possible after a financial year has finished and certainly within 6 months in order to be able

to contribute in a meaningful way to any discussions about work programmes and budgets for the future financial year.

I look forward to hearing from you what decisions Ofgem makes on company performance reporting as a result of this open letter consultation.

Yours sincerely

Yours sincerely,

A handwritten signature in blue ink that reads "Amanda McCleery". The signature is written in a cursive, flowing style.

Amanda McCleery
Overhead Wires Officer