

Date: 09 October 2015  
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Clothilde Cantegreil

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**BY EMAIL ONLY**

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Dear Clothilde Cantegreil

**The Office of Gas and Electricity Markets Ofgem - Open letter consultation: how we report on electricity distribution company performance**

Thank you for your consultation on the above which was received by Natural England on 28 August 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

I am pleased to attach Natural England's response to your Open letter consultation provided in your template format. I hope that our response is of assistance to you. If you would like to discuss our response in more detail, please contact me, at the following email address:  
[deborah.hall@naturalengland.org.uk](mailto:deborah.hall@naturalengland.org.uk).

Yours sincerely

Greg Smith  
Manager  
Sustainable Development

Question	Response
Q1: Do you have any comments on the scope and purpose of this consultation?	
Q2: What do you think about the information we suggest including in an infographic-style report included in Table 1?	
Q3: Are there any other metrics you would wish to see included in an infographic-style report and why? You will find more information on data collected in the RIGs on our <a href="#">website</a> .	<p>Table 1 contains ‘Environmental Impact’ summarised by ‘Business Carbon Footprint’. It would be helpful to see this replaced by 2 lines:</p> <ul style="list-style-type: none"> <li>• Business Carbon Footprint and</li> <li>• OHL (km) in designated area at end of year – the top line in Annex 2</li> </ul>
Q4: Do you have any comments on the sample infographic-style report included in Annex 1 and the suggested content for an infographic-style report included in Annex 2?	<p>See response to Q7 as it is not clear from Annex 2 what constitutes a ‘designated area’ in the table. Looking at the other material it appears to refer solely to protected landscapes. It is also not clear if this is just National Parks and AONBs.</p>
Q5: Should an infographic provide information at DNO or DNO group level?	
Q6: Are there any metrics included in Table 2 which you do not think are relevant or important? Why?	
Q7: Are there any other metrics not included in Table 2 which you would also like to see reported in a mid-level report? Why? You can find more information on data collected in the RIGs on our <a href="#">website</a> .	<p><b>Designated Areas</b> – We welcome the Protected Landscape metrics proposed. However, it would also be helpful to include the km OHL within a protected landscape–(on the list in Annex 2). This would enable a useful measure to be taken on the reduction of OHL within these sites and consequential reduction in visual impact.</p> <p>It is suggested that this measure could be used for all designated sites including those designated for biodiversity/geodiversity i.e. Internationally protected sites (Ramsar Sites ), European designated sites (Special Protection Areas, Special Areas of Conservation) as well as Sites of Scientific Interest (SSSI).</p> <p>There can be impacts on sites from new schemes, undergrounding, and replacement measures that may require mitigation measures to be undertaken. In addition management of the way-leaves may also affect SSSI condition. This is something that we can provide data on to help inform individual company reporting.</p> <p>For National Grid alone we have previously looked at the number of km within SSSIs and note that in 2013 there were 175 km of pipes, cables and lines on more than 150 SSSIs.</p> <p>Any positive enhancement measures undertaken for biodiversity could also usefully be recorded to help inform the Government’s Biodiversity 2020 targets.</p>

Q8: <i>Would you like information and/or data published to reflect in-year performance or are you also interested in performance up to date and/or forecast or cumulative data? If so, why?</i>	
Q9: <i>Do you have any comments on the templates provided by stakeholders in annexes 2 and 3?</i>	
Q10: <i>Would you be interested in the bill impact of each individual incentive or is overall bill impact a more useful measure?</i>	
Q11: <i>What additional data or information submitted in the RIGs would you like to see made publically available and why? You will find more information on data collected in the RIGs on our <a href="#">website</a>.</i>	
Q12: <i>Do you have any preferences on the way data and information is presented?</i>	
Q13: <i>What data should the DNOs publish?</i>	
Q14: <i>What are your views on what data Ofgem should publish?</i>	
Q15: <i>Based on the examples in annexes 1 and 4, and in tables 1 and 2 above, what do you think about using ranking and/or traffic lights? What are the advantages and disadvantages? Are there any alternative systems?</i>	
Q16: <i>Are there any particular aspects of DNO performance that you are interested in and think are well-suited to ranking and/or traffic lights?</i>	
Q17: <i>What information or data would you like us to publish on our website?</i>	
Q18: <i>Keeping in mind the reporting requirements and timings set out in Annex 5, is there any specific data or information which you would like to see reported on more than an annual basis? If so, why?</i>	