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Dear Aram

**Formal Response from the Energy Networks Association to the Pitt Review
Interim Report**

I am writing in response to your request for comments and further evidence following publication of the Pitt Review Interim Report.

Some Electricity Network Owners have provided individual responses and I welcome the opportunity to respond on behalf of ENA.

As you are aware, following the severe flooding in 2007, the Energy Minister requested ENA to lead a comprehensive assessment of electricity substations' resilience to flooding and identify the steps that could be taken to mitigate current and future risks. This assessment covers Scotland, Wales and England which are the areas under the jurisdiction of the Energy Minister and the Energy Emergencies Executive (E3). It is expected that the report will be made available for the Northern Ireland Government to consider.

The Task Group included representatives from all the Electricity Networks companies, BERR, Ofgem, the two Environment Agencies covering England, Wales and Scotland and the Met Office. As you know, the Group has also liaised with the Pitt Review Team.

This report has been delivered to The Energy Emergencies Executive and the Energy Minister and I now enclose a copy for your information. You will see that a further stage of work for the Task Group is recommended which will include reformatting the existing document into an ENA, Engineering Technical Report (ETR) that will be publicly available. In the meantime, I should be grateful if you would retain the attached version for your own use and not forward it to others.

The report specifically addresses Interim Conclusions (IC) 54 and 57 and also relates to ICs 3, 7, 19, 20, 21, 22, 33, 37, 52, 53 and 60.

The report describes a systematic, seven stage approach to ensure resilience of existing substations against flood risk and recommends the degree of resilience applicable to key types of substation. The level of defence provided for any substation at risk will be agreed following a detailed cost benefit for each site.

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To enable this process to be successfully implemented, certain vital requirements need to be in place and we welcome any assistance you may be able to provide in the recommendations contained in your final report. These issues are:-

1. The provision of accurate and detailed information from The Environment Agency (EA) and The Scottish Environment Protection Agency (SEPA) for areas at risk of flooding from rivers and the sea, together with predicted flood depths.
2. The provision of similar information for areas susceptible to surface water or “flash” flooding.
3. Flood warnings are required that provide the maximum notice period possible, not simply a guaranteed minimum figure of two hours for river flooding and six hours for tidal flooding as is generally the case at present and makes the use of temporary flood protection systems impractical.
4. When considering the financial case for maintaining or extending flood protection schemes, it is recommended that EA and Local Authorities in Scotland should extend their criteria to include estimated consequential costs to society as a result of primary and higher voltage substations flooding. This is of course applicable to other Critical Infrastructure.
5. A further key issue is the need for the establishment of a common cost and safety benefit assessment to ensure optimal investment in flood defences for people, businesses and critical infrastructure.
6. The planning policies in England, Scotland and Wales are different and, from an industry perspective, the different approach taken within National Planning Policies could undermine some of the rationale for an effective and coherent UK policy that can be applied to securing electricity supplies during flood incidents.
7. Whilst these Planning Policies are intended to deal with new developments, they also appear to capture retrospective flood defence work. If permanent perimeter Flood Protection is to be provided by a Network Owner at an existing site there are requirements to make provision for any flood plain capacity displaced by the installation of protective barriers. In many situations, particularly urban environments, this is likely to be very difficult or impossible to achieve and it is essential that the relevant authorities take into account the wider advantage to society of protecting critical infrastructure.
8. The report recommends that clearer national guidance is prepared by Defra and the EA on climate change adaptation to ensure a consistent and cost effective approach to investment and resilience planning within the electricity industry.

Regarding specific ICs I should like to make the following additional points:-

9. Recommendation 10 and IC 56 (Provision of information on critical national infrastructure to Category 1 Responders)
We are concerned that these proposals should be aligned with the current advice contained in the letter from Bruce Mann CB, Director Civil Contingencies dated 14 March 2008.
10. ICs 55, 58 and 60
Emergency planning for Electricity Network Owners is overseen by the Department for Business Enterprise and Regulatory Reform (BERR) and previously DTI. The DTI have undertaken detailed reviews of resilience

planning, and used independent experts to do so. Those reviews encompassed matters that are the content of BS 25999, though preceded that document.

Whilst there has been reference to BS 25999, we believe that BS PAS 55 may be more appropriate, covering Asset Management and Risk Management. PAS55 is a standard for the management of physical infrastructure assets, was developed with the Institute of Asset Management and BSi and has a certification regime in which Electricity Network Owners participate. It has been used in the electricity sector as a benchmark to which companies manage their assets in a holistic risk based manner. Being specific to infrastructure, and already in use, it could be a better basis than BS25999 which is more generically applicable to organisational resilience.

We are concerned about any proposal to duplicate ownership or reporting responsibility by the introduction of linkage to local authorities. We believe that if there is a case to add or change to emergency planning obligations on TNOs and DNOs then the correct route for that is for BERR to do so, and Ofgem to agree any consequential impact on financing. It could be a recipe for confusion and conflict if Local Authorities each believed they had oversight of TNO and DNO plans which will overlap a number of Local Authority areas.

We believe that Electricity Network Owners are fully engaged with Resilience Forums although, because Network Owners span many Local Resilience areas, this engagement is necessarily with Regional Resilience and Utilities Sub Groups who can respond to requests from Category 1 Responders. To ensure good communication with Resilience Forums Network Owners are always pleased to attend meetings and give presentations on critical electrical infrastructure and emergency planning and a number of Network Owners have recently spoken about substation resilience. However, as indicated above, it is more practical if briefings and information exchange are channelled through Regional Resilience.

If you would like to discuss the report of the ENA Task Group or any of the points in this letter please contact Alan Claxton or David Whensley here at ENA.

Yours sincerely

A handwritten signature in blue ink, appearing to read "David Smith".

David Smith

Acting Chief Executive