

By email to: RIIO2@ofgem.gov.uk

Network Price Controls Team

OFGEM

4th September 2020

Dear Sir/Madam

RIIO-2 Draft Determinations - Electricity Transmission

Determinations on price controls for 2021-26

Mountaineering Scotland is a membership organisation with over 14,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains, and acts to represent, support and promote Scottish mountaineering.

Mountaineering Scotland also acts on behalf of the 80,000 members of the British Mountaineering Council (BMC) on matters related to landscape and access in Scotland, and provides training and information to mountain users to promote safety, self-reliance and the enjoyment of our mountain environment.

Our interests lie with the perceptions of landscape and its wild qualities. Walkers and climbers move through the landscape to mountain destinations, they are not static observers of landscape. Our main focus is therefore the overall effect of transmission line projects on the landscape qualities and visual impact in the National Parks, National Scenic Areas and Wild Land Areas that the routes traverse.

Our response addresses question ETQ7 only.

ETQ7 consultation question: What are your views on our consultation position for setting the expenditure cap for visual amenity mitigation projects in RIIO-2?

Mountaineering Scotland has participated in and provided letters of support to SSEN's VISTA projects at Glen Sloy and Glen Falloch, made possible through the RIIO-1 funding programme.

We support the intention to fund mitigation projects that reduce the visual amenity impacts of existing infrastructure in National Parks and National Scenic Areas in Scotland. This policy has public benefit in the appreciation of landscapes that these designations identify as being of national importance.

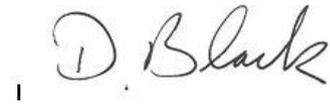
As more grid reinforcements using overhead high-voltage lines are proposed it is important to be able to mitigate the landscape impact of existing OHLs by visual mitigation projects in areas designated for their landscape and visual amenity.

We support the commitment to funding these projects in RIIO-2. We also note that the Willingness To Pay survey cited in the consultation document states that recommendations make a very conservative assessment of the statistical evidence when estimating consumers' Willingness To Pay.

We therefore think that the proposed price cap be regarded as a minimum and not a ceiling, and encourage Ofgem to consider a higher payment cap.

We valued being consulted on these VISTA projects and hope to continue to give our support to future visual amenity projects affecting mountain areas, funded through RIIO-2.

Yours sincerely

A handwritten signature in black ink that reads "D. Black". The signature is written in a cursive style with a small vertical line to the left of the first letter.

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