

17 July 2012

Kevin O'Neill
Electricity Directorate
Utility Regulator
Queens House
14 Queens Street
Belfast BT1 6ED

Dear Mr O'Neill

Consultation on the Utility Regulator's Draft Determination for the fifth price control for Northern Ireland Electricity Ltd (RP5)

Northern Ireland Environment Link is the network and forum body for non-governmental organisations concerned with the environment of Northern Ireland. We represent 57 Full Members who collectively have nearly 100,000 individual members. NIEL is also the secretariat for Climate NI and has accordingly been working on climate change adaptation, and these comments reflect those interests.

There is no doubt that the climate is changing and that it is prudent and cost effective to adapt proactively to those changes. The general predications of hotter, drier summers; warmer, wetter winters and likely increase in frequency and possibly severity of extreme weather events have been supported by recent experience and there is little doubt that this trend will continue to impact on the infrastructure, economy and people of Northern Ireland. Preparation for these conditions is essential if Northern Ireland is to be resilient, future-proofed, be prepared for emergencies and capable of minimising the disruption and distress caused by weather and climate changes.

Infrastructure is one of the key areas identified in the UK Climate Change Risk Assessment published earlier this year and one of the key aspects being progressed in Northern Ireland's development of its own Climate Change Adaptation Programme expected from the Department of the Environment early 2013. It is vital that the impacts of climate change be considered fully in the planning for electricity infrastructural development, upgrading and emergency planning. In the medium to long term, and certainly within the lifespan of any currently planned infrastructure, there will be significant climate changes which will impact on that infrastructure, and it is only prudent and proper that those impacts are considered within any investment decisions taken now. Prevention of damage is always preferable and less expensive than suffering infrastructural breakdown, with greatly increased costs of repair on top of normal replacement, higher labour costs, difficult repair conditions and greatly increased costs to the consumer in terms of both financial impacts and health and well-being implications. It is therefore that investment in the electricity infrastructure plans for the changing climatic conditions through upgraded standards, early replacement or upgrading of aging infrastructure, and ensuring that all new infrastructure is 'fit for purpose' in a changing world, including incorporation of a higher proportion of renewable generation and increasingly severe and unpredictable weather events. This is the best way to deliver overall decreased costs to consumers.

Yours sincerely

Sue Christie
CEO Northern Ireland Environment Link