

## RESPONSE TO COSTINGS REPORT.

The latest Life Time Cost Analysis still lacks details, has unexplained costs and has numbers imputed that make no mathematical sense. There is still no costing for undergrounding the green route instead SP continue to maintain the costings of a 24km road route without even costing the cheaper option of cabling the green route. Repair and maintenance costs continue to be at odds with the rest of available details to us and was even pointed out by the inspector in the Mid Wales connection. There is a line called 'capital cost of installation of fixed equipment' which has no explanation to it even though it contains figures that range from £15m to £18m. For some bizarre reason this cost not only is greater for cable v OHL with no explanation but also is higher for the low cost cable (£18m) than the high cost cable range (£17.5m).

On a low v low basis the general SP figures suggest a range of £16m to £19 over 25,40,75 or 125years. If these figures were corrected by lowering the capital cost to £1m km (still higher than other data) and maintenance costs were twice for cabling than OHL (as National Grid state but still high) we would see a net reduction in this range to roughly £12m to £16m. Again if the route followed the green corridor as a guide this would take a further 4km off the route and therefore a further £3m. Making the Lifetime cost £9m-£13m.

The inspector in the Mid Wales Inquiry stated that to 'retain a valuable landscape unharmed and avoid substantial harm to two SAMs and a non-designated asset' it was justifiable to spend an extra £6.65m-£9.55m undergrounding one of three options between 4km and 6km in length.

In their Strategic Options Report SP state that 'The assessment has taken a precautionary approach and looked at a number of areas for undergrounding based on significant effects and comments received during consultation'. Other than undergrounding at Tir Mostyn which was ruled out on the basis of what are now flawed figures we have seen no details of the work done on other areas where significant effects were observed. Either this statement is untrue or the work done has not been presented.

It is clear that the cost of undergrounding is justified along the route and in some areas the economic, social and environmental cost of the OHL is far greater than the cost of undergrounding the cable.

Sp state the reasons for the extended cable route are due to –

Access worries – They have the same access rights under electricity act 1989 for cable and OHL and the purpose of a compulsory order is to give permanent rights so there would be no issue.

Health and safety – Putting the cable with other utilities especially a 132kv cable would make in my view be more dangerous than placing through fields and make access for repairs slower. If Sp worry about markers going from fields in time then surely it would be their responsibility to replace them on a 10yrs basis or similar.

Installation Stress – SP suggest that roads would have less bends and more gradual slopes. The inspector in Mid Wales disagreed with their assumption on this.

### Other Simple observations

- Lower end cost for OHL reduced to £280k per km due to details of two recent tenders; did they follow similar terrain, etc? No details supplied.
- Terminal post £150k each , same post £220k according to SP in the Llandinam inquiry. Why the change in cost in one year by the same people?
- Two cable projects quoted at £1.1m mostly in roads/verges and £1.19 Mix inc rock. SP stated in Llandinam 132kv that trenching in rock multiplied the cost of trenching. The Trawsfynydd project was also of short length therefore higher overheads per km and also had to be partially trenched in rock.
- SP still refuse to show any costing for under grounding through farmland. Even if they have worries of access and safety they should still have assessed the cost of going through farmland to lower the length of the route. The inspector at the Mid Wales connection inquiry stated 'in an intensely rural location such as this much lower fault rates and lifetime costs can be anticipated'.
- Cable losses – I accept that SP's new calculations are probably the accepted method but why wasn't it done right the first time?
- Repairs/Maintenance – SP figures are still multiple times higher than others (even the National Grid state them to be circa twice that of OHL). SP state that they have no data on XLPE cable even though they have been installing them since the 90s and are spending millions each year replacing older type cable with XLPE. They then state that faults are mostly manufacturing or installation faults, surely they would claim the cost of those on the responsible parties. They also state that 50% of repairs are due to damage; surely these would be covered by third party insurance.
- Does not match SP statement in application that there are no maintenance cost to cables once laid.
- There are no costs stated with undergrounding all the existing three phase lines.
- Nice pictures of damaged cables and cable trenching but no pictures of damage to OHL from farm machinery.
- Decommissioning – In the application SP state that decommissioning of OHL would be process to construction whilst cable could be laid in the ground. Now the costs are reversed.