SP Electricity North West

Environment Report

2024/2025

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SP Electricity North West

1. Executive Summary

SP Electricity North West is dedicated to achieving the highest standards of environmental performance, not only by minimising the environmental risks created by our activities, but also through targeted investment in outputs that deliver a positive environmental impact.

We are determined to play our part in enabling the UK's transition to a Net Zero carbon future and the social economic and environmental benefits that this will bring. This desire influences both our asset investment plans and the investments we make in measures to reduce our own carbon footprint.

1.1 Our Business/Who We Are

We operate an electricity distribution network delivering power to five million people with 13,000km of overhead lines, over 47,000km of underground cables, almost 84,000 items of switchgear and more than 35,000 transformers. We do this through a workforce of more than 2,000 people, a large contractor workforce, a fleet of over 1,000 commercial vehicles, trailers and items of mobile plant, and 16 depot and office sites. Consequently, our activities create risks, impacts and opportunities with regards to their impact on the environment.

The environmental aspects we manage include those associated with holdings of electrical insulating oil, waste management, vehicle emissions, holdings of sulphur hexafluoride gas (SF_6) and work in environmentally sensitive areas.

We have opportunities to minimise resource use and reduce waste to landfill. As the electricity distribution network operator for the North West of England we have a key role to play in enabling the transition of our region to a zero carbon economy, supporting the UK as a whole and our region in meeting its climate change targets.

Our network covers some of the most beautiful scenery within the UK and some of the areas make the maintenance of our assets challenging due to the rural locations and distances that are covered. We have a duty to maintain the network as well as to protect and improve the environment we operate in, including;

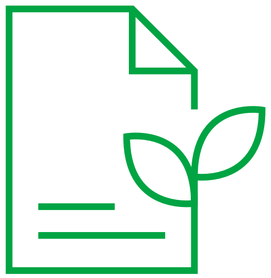
- Ensuring environmental planning is considered through all our design, planning and construction phases;
- Reduction of our carbon footprint;
- Protecting National Landscapes;
- Continuing to improve distribution losses;
- Reduce SF_6 emissions and oil leaks; and
- Using innovation and stakeholder engagement to reduce our environmental impact.

1.2 Purpose of the Report

It is important to us that customers and other stakeholders have a clear understanding of how we endeavour to minimise any adverse impact that our activities might have on the environment and how we are taking advantage of opportunities to play our part in the transition to a Net Zero carbon economy.

The purpose of this report is to provide details on the progress we have made in the second year of the RIIO-ED2 period (this is the price control period set by Ofgem from 2023-2028) in terms of our overall strategic environmental objectives and meeting the environmental targets we set out in our RIIO-ED2 business plan.

In parallel with delivering a reliable and safe network, we have continued our commitment to leading the North West to Net Zero. Collaboration is pivotal to our approach and working with our customers and stakeholders will ensure we provide the best support to our communities.



We are ensuring our network is fit for the future by creating a low carbon network, by developing the technology and systems, and preserving biodiversity and ecosystems by driving down our carbon emissions.

To reflect our environmental aims, we encapsulated our ambition in the Environmental Action Plan for RIIO-ED2. Delivery is tracked against 21 goals with seven focussed on our Net Zero ambition and 14 on wider environmental aspects. The table overleaf sets out these goals and provides a summary of progress against those commitments in 2024/25.

In parallel with delivering a reliable and safe network, we have continued our commitment to leading the North West to Net Zero. Collaboration is pivotal to our approach and working with our customers and stakeholders will ensure we provide the best support to our communities

Table 1: Environmental Action Plan goals and progress in 2024/25

Delivery Programme	EAP Goal No.	EAP Action Plan Goals	Expected Benefit/key milestones	FY25	ED2 target
Carbon emissions	1	Become a leader in the reduction of carbon emissions and achieve Net Zero by 2038	Decarbonisation road map has been developed combining Science-based target reduction of 63% by 2035 and Net Zero ambition by 2038	G	G
	2	Adopt Science-based targets to help limit global warming to 1.5°C above pre-industrial levels	Science-based target validated using baseline data from 2019/20	G	G
	3	Take responsibility for our major supplier's scope 3 emissions and include them in our Science-based targets	Included in recalibrated Science-based targets and will continue to be monitored on monthly basis	G	G
	4	Manage our electricity distribution losses and achieve reductions of 8GWh per year throughout RIIO-ED2	Low loss replacement transformer programme is on track for reduction target achieving 1.39 GWh reduction	G	G
Network investment	5	Maintain a leakage rate of less than 0.3 % of our total bank of sulphur hexafluoride equipment	Increased Sulphur hexafluoride impact from Gas Vacuum Reclosers in year caused an increase in SF_6 emissions – more detail is available in the SF_6 section of this report	R	A
	6	Baseline the embodied carbon within new projects by the end of 2024/25 and set reduction targets	Major projects have been baselined for embodied carbon for 2024/25, with approach shared with suppliers to increase performance	G	G
	15	Maintain a leakage rate of less than 25,000 litres per year of oil	Programme developed to track and improve response time to oil leakage from fluid filled cables to minimise environmental impact with 15,610 litres lost in year	G	G
	16	Remove overhead lines from national parks and areas of outstanding natural beauty	Overhead lines asset replacement plan in place with stakeholder engagement ongoing with 0.5km removed	G	G
Operational response	17	Take action to reduce noise pollution	Continue to work with our customers to reduce the impact of our operations on local amenity, we are exploring alternative generator options to reduce noise impact	G	G
	18	Phase out the use of diesel and petrol vehicles which produce emissions of NOx and other air pollutants	This is a key component in our decarbonisation road map with a focus on transition to electric vehicles. Enhanced data will be available from September 2025 to allow decision points to be identified in RIIO-ED2 for vehicle transition	G	G
	19	Remove equipment contaminated by polychlorinated biphenyls from our network by the end of 2025	Polychlorinated biphenyls (PCB) transformer replacement programme on track to comply with PCB Regulations by 31 December 2025 with over 400 interventions on Pole Mounted Transformers	G	G

Table 1: Environmental Action Plan goals and progress in 2024/25 (continued)

Delivery Programme	EAP Goal No.	EAP Action Plan Goals	Expected Benefit/key milestones	FY25	ED2 target
Supply chain	8	Enhance environmental management standards through our supplier code and target at least 80% of our supply chain to meet this code	We have identified our top 20 supply chain partners to work in a collaborative environment and are continuing to push performance with our supply chain partners. There is more work to be done in this area but are focussing on where we will be by the end of RIIO-ED2	A	G
	9	To be responsible consumers of resources and reduce the amount of waste produced by the end of RIIO-ED2	We are working across our supply chain to reduce the impact on resources and embed circular economy principles	G	G
	10	Divert 95% of our waste away from landfill by the end of 2025 and reuse or recycle 70% of our waste by the end of RIIO-ED2	We were able to divert 97% of our waste for landfill and resuse and recycle 73%	G	G
	11	Reuse and recycle at least 85% of waste excavated for installation and repair	We are working across the industry to ensure compliance with the Material Classification Protocol to reflect the work being done across the utility sector on how to comply with guidance	G	G
	12	To be responsible consumers of water and reduce the water consumption per colleague during RIIO-ED2	This forms parts of our wider decarbonisation plans as we continue to reduce our consumption from our estate	G	G
Biodiversity	13	Adopt an appropriate tool to assess changes in natural capital from different options for network projects	Natural capital tool developed and in use for biodiversity programme to baseline our estate and track biodiversity enhancements	G	G
	14	Enhance biodiversity and natural capital across 100 sites during RIIO-ED2 and plant 10,000 trees per year	100 sites, predominantly substations, identified and being actively managed to improve biodiversity and 10,000 trees planted in 2024/25	G	G
	7	Achieve the Carbon Literacy gold standard	We continue to work towards gold standard by the end of RIIO-ED2, focus for 2024/25 has been on delivery to office-based teams	G	G
	20	Train more colleagues on the requirements of our Environmental Permits for oil recycling through a CMS to reduce risks of environmental harm	Programme developed to identify key areas for training development and on track for delivery in RIIO-ED2 with a focus on compliance with PCB legislation to all operational teams and contractor partners	G	G
	21	Provide training to our wider leadership team to enhance environmental awareness	Environment and sustainability communications plan developed to target training, supported with awareness bulletins	G	G

Review of progress against EAP commitments and focus for 2025

We continue to make good progress against our environmental action plan goals with most goals assessed as on track.

For those goals that are classified as amber or red we have plans in place to ensure progress by the end of this regulatory price control period. In summary these goals are:

Goal 5 – maintain a leakage rate of 0.3% of our total SF_6 bank. See section 3 for more information on why this limit was exceeded and the pro-active steps we are taking to manage our SF_6 bank including exploring SF_6 free alternatives for our network.

Goal 8 – we continue to work with our supply chain to drive environmental performance, see section 6 for more information on supply chain management.

For those goals that are classified as amber or red we have plans in place to ensure progress by the end of this regulatory price control period

1.3 How we manage our environmental and energy performance

We are committed to achieving excellence in environmental and energy management performance, minimising any adverse impacts our operations might have and fulfilling our obligation to improve the environment that we operate in. This is critical for us to drive continous improvement in our environmental and sustainability performance. This commitment is secured by undertaking the following measures:

- Implement and maintain a robust environmental management system that is certified to ISO 14001 (the international standard for environmental management systems) and an energy management system, which is certified to ISO 50001 (the international standard for energy management);
- Identify the environmental and energy-using aspects associated with our activities, looking for opportunities to reduce energy usage and implementing solutions to improve our performance;
- Comply with all applicable environment and energy management law and other relevant requirements and, where possible, exceed them;
- Integrate environmental performance and energy management considerations into business as usual processes including the setting and reviewing of objectives and targets;
- Operate and maintain systems of work that minimise adverse environmental impacts and seek to minimise energy usage whilst delivering beneficial impacts;
- Inform, instruct, train, supervise and equip people to identify and minimise adverse environmental impacts, maximise energy management opportunities and deliver beneficial impacts;
- Make environmental and energy management performance a priority in the selection of suppliers of goods and services;
- Manage the waste generated by our activities according to the principles of reduction, re-use and recycling;
- Minimise the carbon footprint of our business and actively contribute to the low carbon economy;
- Manage our business operations to prevent pollution and wasteful use of energy;
- Maximise the sustainability of natural resources used in our activities; and
- Develop and promote a culture of continuous improvement regarding environmental and energy management performance.

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To deliver this policy commitment we work to an environment strategy that is based on:

- Management of identified environmental risks and opportunities;
- A clear understanding and visibility throughout the business of environmental aspects and impacts;
- Targeted investment and expenditure in environmental control measures;
- Strong corporate governance and performance management;
- Continuous learning and improvement; and
- A systematic approach to environmental management.

1.4 Role of Stakeholders in Environmental Management

Working in partnership with a range of other stakeholders, including national and local government, utilities, charities, community energy, suppliers and regulators, we are committed to enabling net zero for the North West. . This includes activities to drive down our own operational business carbon emissions, as well as those associated with the distribution network, and support our colleagues, business customers and partners to lower theirs.

We meet regularly with our regional partners, including the Greater Manchester Combined Authority, Lancashire County Council, Cumberland Council and Westmorland and Furness Council, and representatives of Protected Landscapes (National Parks and National Landscapes) to discuss visual amenity in designated areas. Through this process our stakeholders play a key role in shaping our environmental strategy and investment priorities.

We have a stakeholder engagement strategy that includes working with several advisory panels. These are made up of stakeholders who are subject matter experts and represent our communities. One of our panels, the Environment and Sustainability Advisory Panel, focuses on environment and sustainability challenges; ensuring our network can adapt to future challenges.

Read more about how we are making the North West's electricity network ready for the future:

future energy (enwl.co.uk)

Details of our stakeholder engagement practices and how customers and stakeholders can get involved can be found via the following link:

Engaging with our stakeholders (enwl.co.uk)

2. Business Carbon Footprint

We have committed to minimise the carbon footprint of our business and actively contribute to the transition to a zero carbon economy. Our carbon footprint is a measure of the impact our business has on the environment through our emissions of greenhouse gases.

Our carbon footprint is aligned to the Science-based target initiative for 2024/25 reporting onwards. We aim to reduce our carbon emissions by 63% by 2035, relative to a 2019/20 baseline.

In 2024/25, we continued to realise the benefits from our investment in fuel efficiency including reduced vehicle weights, installation of engine rev limiters and educating our drivers on the most efficient way to use our fleet.

Further investment in the refurbishment of our buildings also took place including the installation of more energy efficient equipment. This investment, alongside continued promotion of energy reduction behaviour with our employees, has supported a reduction in depot electricity consumption of 6.3% compared with the previous year.

Our Science-based target trajectory to 2035 is based on action driven changes to reduce our emissions, beyond 2035 we will consider carbon offsetting to meet our 2038 Net Zero target.

Our total emissions were 17,882 tCO_2e against a target of 18,190 tCO_2e. The tCO_2e contribution from mobile generators was mostly mitigated by our improved electricity performance in our buildings. To better cope with the impact of climate change we are pursuing alternative strategies for managing our generators to include full electric, where practicable, hybrid and biofuel[1] options to reduce the environmental impact of maintaining power supply for our customers. We take extra measures to ensure that our vulnerable customers can maintain critical lifesaving equipment in the event of a power failure.

Our approach to scope 3 emissions is focused on increasing the number of GHG emission indicators we monitor, whilst enhancing the data quality to further support reductions. As part of our SBTi commitment, fuel and energy related activities and commuting will be tracked as part of our GHG emissions going forward. Environmental Action Plan goal 8, aims to enhance environmental management standards through our supplier code and target at least 80% of our supply chain to comply.

As part of this process, we are developing our environmental and energy management standards with our supply chain, supported by the Supply Chain Sustainability School membership. We are also developing the next phase of our Carbon Literacy programme to collaborate with our suppliers.

[1] Our biogenic emissions (outside of scopes) associated with HVO use in generators was 374.26 tonnes CO_2e

Table 2: Business Carbon Footprint detail

Business Carbon Footprint	2024/25 tCO_2e	2023/24 tCO_2e
Scope 1		
Operational transport	4,453	4,448
Fugitive emissions	1,460	663
Fuel combustion	137	292
SCOPE 1 TOTAL	**6,050**	**5,403**
Scope 2		
Buildings energy usage	3,593	3,630
SCOPE 2 TOTAL	**3,593**	**3,593**
Scope 3		
Contractor Transport Fuel	1,452	1,445
Company/Lease, Personal Cars	679	589
Rail	10	7
Air	75	37
Generator Fuel	2,576	2,888
Commuting	955	N/A
Upstream Fuel and Transport (Well-to-Tank)	1,309	N/A
T&D and WTT Purchased Electricity	1,183	N/A
SCOPE 3 TOTAL	**8,239**	**4,966**
Business Carbon Footprint (excl. losses)	**17,882**	**13,999**
Electrical losses[2]	328,413	304,723
Business Carbon Footprint (incl. losses)	**346,295**	**318,722**

[2] The reported electrical losses figure is a snapshot of received data as of the date of this report and will change as further settlement reconciliation runs are carried out (up to 28 months after each relevant settlement date).

3. Sulphur Hexafluoride (SF_6) & Other Insulation and Interruption Gases (IIG)

SF_6 is a gas with excellent electrical insulation and other properties, which have led to its widespread use in electrical switchgear and in several other industrial applications. In recent years, there has been growing concern over any SF_6 that releases into the atmosphere because of its identification as a potent greenhouse gas. It has been highlighted that SF_6 is 23,500 times more potent than CO_2 as a greenhouse gas.

In terms of our strategy to address the risk associated with SF_6, we contribute to the overall UK electricity transmission and distribution industry in supporting Government initiatives to ensure the implementation of robust policies for the control and use of SF_6. The European Electricity Industries have also agreed a set of actions to reduce emissions of the gas to the atmosphere with manufacturers of electrical equipment. Leakage rates are being reduced in cooperation with power equipment manufacturers under a programme of continuous improvement.

On a company level our current policy is to continue to install modern SF_6 equipment with low leakage rates and leakage monitoring systems. Over the RIIO-ED2 period we plan to maintain a leakage rate of less than 0.3% to 2028, we reviewed this limit and committed to the 0.3% limit for the remainder of RIIO-ED2.

We have a total of 16,353kg of SF_6 inside 10,569 assets. By weight, more than half of the SF_6 on our network is in 132kV assets, although these assets make up less than 2% of our switchgear asset base. As we highlighted in our Environmental Action Plan, our SF_6 holding has increased compared to the previous year, due to new 6.6/11kV being switchgear installed. However, this new switchgear is less likely to leak than older systems. The amount of SF_6 on the network increased by 1,349kg on the previous year. This rise is primarily due to SF_6 at one of our Grid Supply Points (GSPs) not previously being accounted for in our total SF_6 bank, this has now been corrected.

In 2024/25 we removed 89kg of SF_6 but added 343kg due to new installations, resulting in a net gain of 254kg compared to the previous year. Our SF_6 leakage for the year was 62kg, with 6.6/11kV assets contributing 69% of this total. The leakage rate is 0.38% of the total SF_6 bank and this is outside our annual leakage limit rate of 0.3%. This includes top ups and losses assessed from recovered gas from decommissioned plant.

We have a total of 16,353kg of SF_6 inside 10,569 assets. By weight, more than half of the SF_6 on our network is in 132kV assets, although these assets make up less than 2% of our switchgear asset base

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The reason for the increase in our SF_6 losses this year was due to an increased inspection regime for some of our pole mounted assets that contained SF_6. This programme has highlighted that some of these assets have experienced leakage. We claim the SF_6 loss at the point of disposal and account for this in our business carbon footprint. We are currently trialling the use of SF_6 free alternatives for these pole mounted assets.

We continue to utilise a specialist contractor who collects SF_6 containing gear removed from the network, recovers and safely disposes the SF_6 gas by recycling wherever possible and disposal by high temperature incineration.

In the reporting year, we reviewed our annual leakage limit and although we have seen challenges with our SF_6 leakage we have retained our limit as we continue to drive performance in this critical area. We regularly engage with our stakeholders on our performance and feedback continues to be that we set ourselves challenging limits on SF_6 losses.

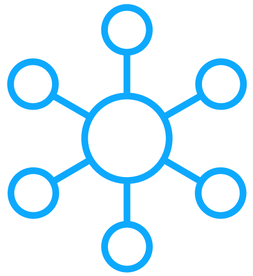
The UK continues to comply with the Fluorinated Greenhouse Gas Regulations 2015, which govern the use of F-gases in equipment such as refrigeration, air conditioning units, and electrical switchgear. As reported last year, the European Union initiated a revision of its F-Gas framework throughout 2023, culminating in the adoption of Regulation (EU) 2024/573 in February 2024. This updated regulation came into force on 11th March 2024 and introduces phased bans on the commissioning of new SF_6-filled equipment across various voltage levels.

Although the new EU regulation is now active in EU law, it does not automatically apply to UK legislation, which still references the 2015 version. However, it is widely anticipated that the UK government will adopt similar measures in due course.

Our strategic approach remains unchanged: we continue to monitor regulatory developments and prepare for alignment with emerging standards. The table below outlines the EU's scheduled ban dates for placing new SF_6-filled equipment into service:

Table 3: EU regulatory SF_6 proposed ban dates

Network – Voltage level	SF_6 Ban Date
Distribution (6.6/11kV)	1 January 2026
145kV	1 January 2028
33kV	1 January 2030



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In line with the new EU regulation, equipment containing non-SF_6 fluorinated gas alternatives—such as C4FN—is permitted, provided the carbon cost of the product is lower than that of an equivalent F-Gas-free alternative.

We have one 132kV circuit breaker containing 4.94kg of g3 gas (C4FN gas) on our network. The pure C4FN gas has a GWP of 419. There has been zero leakage of this gas. This one installation was a trial to ascertain the cost effectiveness of this as a non-SF_6 alternative. Following the successful outcome of the trial, we have decided to proceed with wider deployment of this type of circuit breaker across our network.

For 132kV switchgear, our strategy is to use non-SF_6 technologies for all joint sites as it aligns with National Grid Electricity Transmission's (NGET) strategy. We have trialled a live tank 145kV circuit breaker with a C4FN gas and we plan to replace two more circuit breakers with this same type during this regulatory period. We are working closely with suppliers to accelerate the deployment of SF_6-free solutions. A key milestone in this journey was the successful trial of a GE Vernova g³-filled (C4FN) live tank circuit breaker at our Ulverston 132kV substation. Building on this progress, we plan to procure two additional units of this type over the coming years, reinforcing our commitment to innovation and decarbonisation.

We continue to play a leading role in industry-wide efforts to develop and adopt environmentally sustainable alternatives to SF_6. As chair of the Energy Networks Association's (ENA) SF_6 Working Group, we actively contribute to shaping proposals and influencing outcomes that support the transition to greenhouse gas-free technologies.

For existing assets, we are preparing for future regulatory requirements that will mandate the use of reclaimed SF_6 for all maintenance activities from 2035. Where available, SF_6-filled products may still be used to extend existing installations. In accordance with compliance obligations, records of any SF_6 top-ups or extensions will be retained for a minimum of five years and made available to UK regulators upon request.

We are actively refining our SF_6 strategy in response to these developments, with a focus on collaborative innovation, transparent reporting, and the long-term replacement of SF_6 assets with sustainable, low-carbon alternatives.

4. Electricity Distribution Losses

When electricity is generated, not all the electrical energy which flows through the power network reaches the customer. This is because power networks use some of the energy in the process of transporting the electricity to customers.

In the broadest sense, distribution network losses are the difference between the electrical energy entering the distribution network, and the electrical energy that leaves it. Some losses are associated with the technical characteristics of the electricity network ('technical' losses), whilst other losses are related to measurement and billing issues ('non-technical' losses).

Losses cost customers money and contribute to carbon emissions. They can be reduced in various ways, but these measures also cost money. We act on behalf of our customers to determine the appropriate balance between spending money on reducing losses and saving money for customers by lowering the energy lost during transportation.

The overall level of losses is influenced to a greater extent by electricity usage i.e. the more electricity consumed, the more power transmitted and distributed, the more losses are reported. This movement in losses is reflected in the total losses associated with our network.

In 2024/25 losses were 1,586 GWh or the equivalent of 328,413 tCO_2e. This was an increase of 115 GWh from 2023/24 which, together with a change in the UK government electricity conversion factor, equated to an equivalent increase of 23,689 tCO_2e.

We proactively target losses reduction, and our strategy is to continually review the options for reducing the losses on our network. We have examined the potential for reductions through the application of various alternative investment strategies during the RIIO-ED2 period and are adopting as policy only those strategies that deliver clear positive benefits for our customers.

We also plan to maintain and expand our activities to investigate and minimise non-technical losses, such as theft, while continuing to establish a more reliable reporting baseline for losses within RIIO-ED2.

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As part of this strategy, we are implementing several priorities for reducing both technical and non-technical losses summarised in Table 4 on the following page.

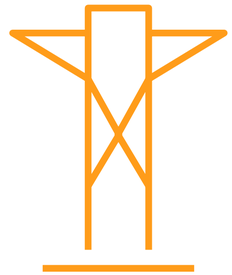

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Table 4: Losses Strategy Summary

Investment	Actions	
Technical losses		
Distribution transformers (ground-mounted)	Replace old (pre-1990) large, ground-mounted, secondary network transformers with capacities of 800kVA and 1000kVA with lower loss EU Eco design	Proactive
Primary transformers	When installation or replacement required, replace with lower loss EU Eco design	Opportunistic
Grid transformers	When installation or replacement required, determine best type to reduce losses with all new transformers lower loss EU Eco design	Opportunistic
Distribution transformers (pole-mounted)	When installation or replacement of larger pole-mounted secondary network transformers required, replace with lower loss EU Eco design	Opportunistic
Cables (high voltage and low voltage)	Install large-cross section cables (300mm²) at both HV and LV as standard	Opportunistic
Non-technical losses		
Transactional theft	Continue to work alongside suppliers to help reduce transactional theft	Proactive
	Monitor / share best practice with other DNOs	Proactive
Theft in conveyance	Develop our theft in conveyance services	Proactive
	Contribute to the development of the National Revenue Protection Code of Practice	Proactive
	Increase number of investigations undertaken	Proactive
	Monitor / share best practice with other DNOs	Proactive
Unmetered supplies	Undertake regular audits of unmetered supply inventory	Proactive
Network Innovation Strategy		
OFGEM Innovation Funding	Review and analyse the details of the innovation projects	Proactive

Our losses strategy can be found at the following link: electrical losses (enwl.co.uk)

Table 5: Summary of Losses Costs and Benefits from Activities in RIIO-ED2

Programme/ project title	Regulatory Reporting Year 2024/25			RIIO-ED2
	Distribution Losses – Justified Costs	Reduced Losses	Reduced Emissions Associated with Losses	Cumulative reduced losses to date*
	£m	GWh	tCO_2e	GWh
Standardise use of 300mm² HV cable	1.55	1.95	344.21	8.26
Standardise use of 300mm² LV cable	0.90	1.25	221.43	5.24
Proactive replacement of pre-1990 1000kVA transformers	0.42	0.45	79.99	0.8
Opportunistic primary transformer replacement	0.23	0.04	7.38	0.08
Relevant theft of electricity action	0.30	2.35	416.46	3.95
Total	**3.40**	**6.04**	**1069.47**	**18.33**

Table 6: Summary of Losses Activity in 2024/25

Programme / project title	Description of unit	Volumes in 2024/25
Standardise use of 300mm² HV cable	km of cable	199
Standardise use of 300mm² LV cable	km of cable	52
Proactive replacement of pre-1990 1000kVA transformers	Transformers	13
Opportunistic primary transformer replacement	Transformers	5
Relevant theft of electricity	Theft cases identified	264

The data relating to our loss reduction activities can be found in worksheet E4 of the Environment and Innovation Reporting Pack in the appendices.

The cost and benefit analyses for our innovative solutions are included in the appendices.

* The values identified represent the cumulative losses calculated by Ofgem's CBA workings tool, assigned to each project. Ofgem reset the cumulative values to 0, following the start of RIIO ED2. The values identified from the previous year's table (2023/24) represented the working baseline utilised within Ofgem's CBA total, assigned to each project.

5. Embodied Carbon

Embodied carbon relates to the amount of emissions associated with materials and construction throughout the whole lifecycle of an infrastructure project.

In line with our Environmental Action Plan we are reporting on the embodied carbon values for Major Projects completed in 2024/25. The report details embodied carbon for components of the project that contribute to greater than 1% of total carbon for that project.

The embodied carbon values per project are for the Design Stage using estimated quantities, volumes, weights and typical embodied carbon factors. As our ED2 contracts and frameworks are being renewed, we are including the requirement for the contractor to provide 'As Manufactured' and 'As Built' embodied carbon reporting, for example embodied carbon reporting is now included in our Overhead Line Towers Installation Framework. Our experience is that larger manufacturers and contractors are already reporting on embodied carbon for other companies and are knowledgeable with embodied carbon reporting. However smaller companies, especially local civil companies, will often first experience embodied carbon reporting on our projects.

Manufacturer / supplier embodied carbon factors are used if they are available and have been supplied to SP ENW. If not available, factors are based on the Inventory of Carbon and Energy (ICE) for materials and civil items. Electrical items values are based on NGED's ALPACA project values where applicable or the Inventory of Carbon and Energy values for individual material types.

For cable laying projects, a standard make up for trench profiles per road type has been used. Profile depths are as follows:

Type 1&2 - 100mm (Tarmac layer), 180mm (Concrete layer), 210mm (MOT Sub base stone), 210mm (Backfill layer) and 200mm (Sand layer).

Type 3&4 – 100mm (Tarmac layer), 50mm (Concrete layer), 275mm (MOT Sub base stone), 275mm (Backfill layer) and 200mm (Sand Layer.)

The embodied carbon reports are for Cradle to Practical Completion (modules A1 to A5).

For the transport to site module (A4) assumptions are made on the source being Local, National, European or Global. The factors used are based on the factors published by Institution of Structural Engineers and UK Government GHG Conversion Factors for Company Reporting.

The construction phase (A5) is broken down into actual construction (A5a) and construction waste (A5w). For Civil Construction the Embodied Carbon values are based on estimated cost of the works. Waste is based on physical weight of material quantities. The factors for converting these values to A5 and A5W are based on the factors published by Institution of Structural Engineers. Waste covers any material removed from site for disposal.

We are trialling new low embodied carbon products such as Eco Cement and building components such as roof tiles. We will continue to trial products, where applicable, in preparation of our embodied carbon reductions plans which will be published later in ED2.

6. Supply Chain Management

We have published our supply chain charter to provide supply chain partners with an understanding of our expectations regarding responsible supply chain practices. The charter is subject to annual review.

We set high standards for our suppliers, particularly concerning compliance with our strict health and safety, quality, ethical standards (modern slavery and real living wage), environmental capabilities, diversity and inclusion strategy. All these areas are carried out in conjunction with our responsibility frameworks.

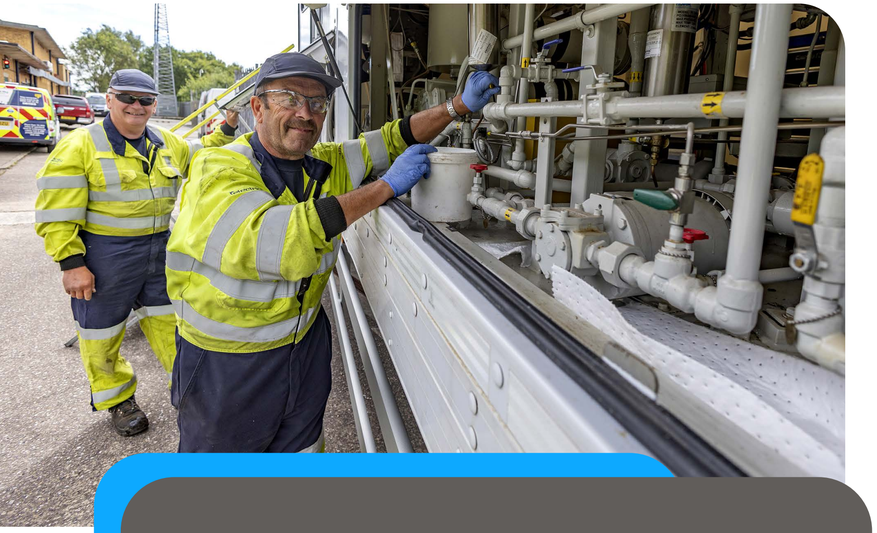
We aim for the majority of our suppliers to be registered with the Achilles' Utility Vendor Database, which is the utility industry pre-qualification system used across the UK. We use the system for most of our procurement exercises, working closely with key buying organisations in the sector. This community helps utilities achieve the highest standards of supply chain assurance. In the year we have used Achilles Analytics to provide greater insight into the environmental, social, governance and financial standing of our key suppliers.

Our framework tender process has developed around our responsible business process from incorporating key environmental and Modern Slavery requirements to Real Living Wage and diversity and inclusion. The business continues to embrace and build on its environmental reporting. We know that there will be more to be done with our supply chain partners. To ensure we influence the wider value chain and to reduce associated emissions, we have used credible knowledge experts to help ascertain the emission hotspots in our supply chain. It is apparent that our scope 3 emissions do not cross the threshold for automatic inclusion in our Science-based targets process, however we have included them based on our ambition to be a leader for Net Zero in the North West.

In addition to conducting Carbon Literacy training for all tier 1 suppliers, contractors and customer partners, we have asked our contractors to complete our 'Switched on to Vulnerability' training that looks to understand vulnerability, giving them the skill and knowledge to enable them to spot the signs of vulnerability and take appropriate action. We have strengthened our approach to diversity and inclusion through the establishment of supplier roundtables and continue to work on mitigating the risk of modern slavery within our supply base.

7. Sustainable Resource Use & Waste

Our commitment is to minimise waste at every stage of our operations whilst implementing innovative solutions and sustainable practices that reduce our environmental footprint.



New oil currently costs around £1.80 per litre compared to approximately £0.97 per litre for our reprocessed oil

What we achieved

We generate waste from a range of our activities and sources, including office and depot activities, asset replacement and network maintenance. This includes anything from paper, plastic, metal, oil or hazardous materials. It is our responsibility to recycle and dispose of this waste responsibly.

We are committed to achieving zero waste to landfill, which aligns with goal 10 of our EAP. This year, our total waste amounted to 2,920 tonnes and we successfully diverted 97% of it away from landfill. We have seen an improvement on the amount of waste that has been recycled and diverted from landfill compared to our previous year. The full breakdown of waste is provided below:

Table 7: Waste composition

Waste breakdown	
Hazardous waste	1,155 tonnes
Recycled waste	1,677 tonnes
Non-recycled waste	88 tonnes
Total	**2,920 tonnes**

7.1 Circular economy opportunities

Our Central Oil Reprocessing Department (CORD) remains the only one of a kind in our industry. We take used, dirty oil from our network and assets and reprocess it into clean oil and are then able to reuse it on our network. This has many benefits, the main one being that we can reduce the amount of virgin oil that is needed on the network as we recover 98% of the oil we process to be put back into the network. Another significant benefit is that we reduce the maintenance requirements on our assets, prolonging the life of assets that reduces the financial impact on our customers but reduces our requirement to replace assets that still have operational value.

New oil currently costs around £1.80 per litre compared to approximately £0.97 per litre for our reprocessed oil.

As part of our focus to reduce single use plastics in our business, we have implemented ‘Our buckets for life’ programme, we use resin for the encapsulation of low voltage cable joints providing a moisture tight seal around the cable. We are now use reusable buckets that helps reduce the amount of waste we generate. We continue to collaborate with our suppliers to explore alternative approaches to reduce our environmental overleaf.

8. Visual Amenity

There are three National Parks and four National Landscapes, collectively known as Designated Areas, either wholly or partially within our region. These are:

- Lake District National Park
- Peak District National Park
- Yorkshire Dales National Park
- Arnside and Silverdale, Cumbria
- Forest of Bowland, Lancashire
- North Pennines, Cumbria
- Solway Coast, Cumbria

We have a programme of undergrounding overhead lines for visual amenity benefits in Designated Areas and we have worked closely with regional partners to ensure its success since its inception in 2005. As part of our wider stakeholder engagement plan, we meet annually with representatives from the above Designated Areas to share information on the individual programmes of work in each of the areas and current topics of interest. Each of the Designated Area statutory body representatives, together with Friends of the Lake District and Friends of the Peak District, meet with SP ENW planners on a regular basis to identify the lines to be undergrounded in their area and to ensure programmes are progressed.

Our investments have also been leveraged by regional partners to deliver greater environmental value and secure additional funding from other sources. This includes £7.9m of National Lottery Funding for a range of landscape improvement programmes in two of the Designated Areas above.

In RIIO-ED2, we are continuing our undergrounding programme and were pleased to secure funding for its continuation in the RIIO-ED2 Final Determination from Ofgem.

Table 8 gives details of the schemes completed in 2024/25 and Table 9 shows the projects planned for completion in 2025/26.

Table 8: Visual Amenity Planned Projects Completed 2024/25

Designated Area	Scheme Delivery 2024/25	Overhead Line to be Removed (km)	Underground Cable to be Installed (km)	Total Expenditure (£)
Lake District National Park	UVA Meathop - Ulpha Sluice	-	-	101,178
Lake District National Park	UVA Thompson Ground Hawkshead Hill	-	-	7,500
Lake District National Park	UVA Helsington Church Helsington	-	-	954
Yorkshire Dales National Park	UVA Clapham Station	-	-	12,567
Lake District National Park	UVA Newlands Rd Braithwaite	0.484	0.425	205,721
	Total	**0.484**	**0.425**	**327,920**

Table 9: Visual Amenity Planned Projects 2025/26

Designated Area	Scheme Delivery 2025/26	Overhead Line to be Removed (km)	Underground Cable to be Installed (km)	Total Expenditure (£)
Lake District National Park	UVA Meathop - Ulpha Sluice	-	1.426	192,035
Lake District National Park	UVA Thompson Ground Hawkshead Hill	-	0.23	5,279
Yorkshire Dales National Park	UVA Clapham Station	0.246	1.465	280,466
Yorkshire Dales National Park	UVA UG Asby Scar Newbiggin On Lune	0.025	3.22	592,293
North Pennines National Landscape	UVA UG Haberwain Crosby Ravensworth	-	1.625	243,000
Lake District National Park	UVA Newlands Rd Braithwaite	-	-	75
	Total	**0.27**	**7.97**	**1,313,148**

9. Noise Pollution

We received 17 noise-related complaints in 2024/25 compared to 25 in the previous year.

The complaints in the year were related to substation noise, which were dealt with through our customer service processes. We investigate any complaints and look to rectify the situation as soon as we can which may include using different types of hybrid generator options that reduce operational noise.

10. Polychlorinated biphenyls (PCBs)

Polychlorinated biphenyls (PCBs) are a group of artificially manufactured organic chemicals that have long been recognised as posing a threat to the environment due to their toxicity, persistence and tendency to bioaccumulate.

We (and our predecessor companies) never sourced PCB-filled transformers but some contamination has, occurred due to cross contamination in the manufacturing process. Generally, PCBs were used in electrical equipment as an alternative insulating fluid where fire resistance properties were required. Although the use of PCBs has been reduced since the 1970s when legislation first sought to control their use and supply, it is recognised that PCBs in existing equipment pose a threat to the environment.

All transformers (and some other network assets) manufactured before 1987 could be PCB-contaminated and are registered annually with the Environment Agency. We are working with the Environment Agency to either test or statistically determine the PCB content of all this apparatus and dispose of items that are PCB contaminated by 31 December 2025 (as legislation requires PCB-contaminated equipment to be removed by this date).

We recycle insulating oil from our network at our oil recycling facility in Blackburn. Prior to receiving oil from our network assets, the oil is tested in our own laboratory to establish its suitability for reprocessing. This looks at several parameters, including its PCB concentration. Although legislation allows for PCB concentrations of up to 50ppm, if our testing shows PCB concentration to be above 10ppm, the oil is not reprocessed to avoid the build-up of PCBs in our oil stocks.

Our RIIO-ED2 action plan for PCBs

Following testing of insulating oil from a network asset, if the PCB concentration is above 50ppm, the equipment will be replaced and the PCB-contaminated oil disposed of via high temperature incineration which destroys the chemicals. All PCB-contaminated equipment will be sent to authorised treatment facilities where the oil will be recovered and the metal components sent for recycling.

As testing of assets to determine the PCB contamination status can be difficult, specifically for Pole-Mounted Transformers (PMTs), which are not normally included in routine oil sampling a statistical approach to identify potentially contaminated PMTs has been developed in conjunction with the Energy Networks Association (ENA) and accepted by the Environment Agency to comply with Regulatory Position Statement 246. This means that cohorts of transformers that have been tested and proven to have PCB contamination below 50ppm can remain in service. This ensures that our customer's money is invested more efficiently as we look to comply with the regulations.

We have a separate testing and remediation regime for testing of Ground-Mounted Transformers (GMTs) reporting and recording that data on our asset register.

We track progress against our PCB replacement programme and update our asset register on an annual basis as required by the Environment Agency. We are using a testing regime that allows our engineers to test a transformer in-situ and then change the transformer if required. We have made significant progress with the testing of our transformer population to ensure that any potentially PCB contaminated assets are removed from our network. Testing is critical as it allows us to maintain assets on the network that then do not need to be destroyed.

In our 2025 submission to the Environment Agency we have 2,926 assets that need to be tested or confirmed statistically that they are unlikely to be contaminated with PCBs, comprised of:

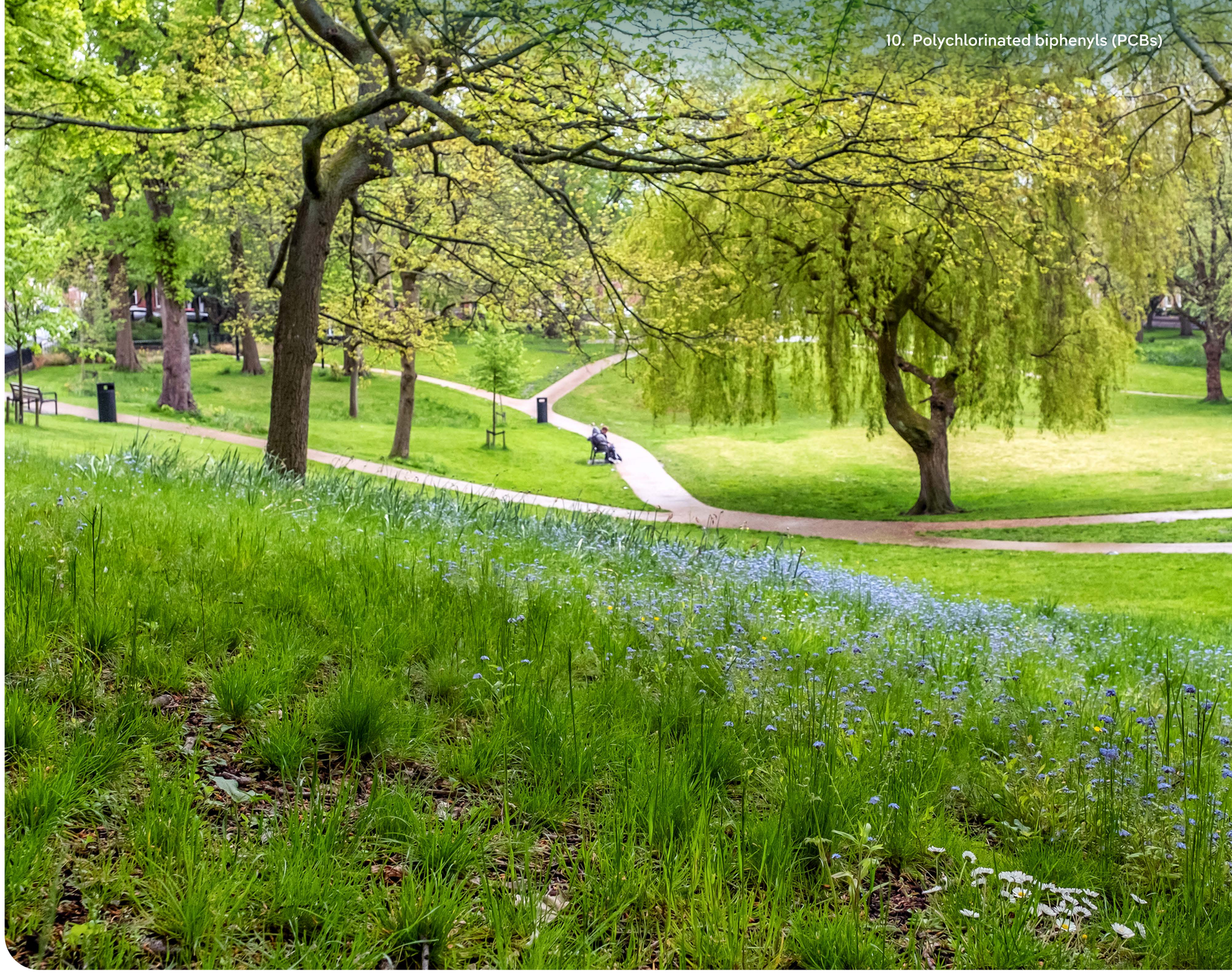
2,037
Pole-Mounted Transformers

416
Ground-Mounted Transformers

473
Other equipment

The ENA and EA have adopted a National Statistical model referenced above and allows transformers to be classified by potential PCB contamination, the model is available here:

PCB Cloud Statistical Model (energynetworks.org)



11. Biodiversity and/or Natural Capital

Helping to tackle the biodiversity emergency is paramount to our environmental ambitions and we have real progress to enhance the biodiversity of our estate.

We have taken significant steps forward in developing our understanding about the natural capital and habitat value of the SP ENW estate, and we are now at an advanced stage where we are effectively delivering novel and proven bespoke management techniques that are providing meaningful biodiversity uplifts throughout our network.

We have made considerable advances in the geo-spatial mapping of our corporate estate, and we are in a strong position to now fully understand how we can most effectively enhance biodiversity in the long term that creates the greatest overall positive impact. In addition to developing an initial baseline natural capital monitoring tool we have also created a suite of Nature Based Solution analysis applications that allows site locations to be assessed holistically for their environmental values and then track progress against our Environmental Action Plan goals for biodiversity:

- **Goal 13: Adopt an appropriate tool to assess changes in natural capital from different options for network projects, and to monitor the provision of ecosystem services**

- **Goal 14: Enhance biodiversity and natural capital across 100 sites during RIIO-ED2 and plant 10,000 trees per year**

We have made significant progress with the active management programme on 100 of our network sites to improve biodiversity levels across the North West and have planted well over 20,000 trees to date on our estate in partnership with Community Forest and River Trusts. To help us target biodiversity enhancement we continue to develop our Natural Capital Tool that ensures we have an accurate biodiversity baseline of our estate. These baselines will be monitored continuously throughout the life of the projects to evaluate the efficacy of the biodiversity management practices.

During December 2024 and March 2025, we continued our tree planting programme on our corporate estate and planted over 10,000 trees on our landholdings at Peel near Blackpool, Penwortham near Preston and Lower Darwen in Blackburn.

The tree establishment was carried out in conjunction with our partner the Ribble Rivers Trust, which beneficially ensured our schemes aligned with the Trust's landscape catchment objectives. As individually, the sites planted in this period were much smaller than at our previous flagship site at Sandsfield Road, constrained with infrastructure and limited by future network expansion needs, this called for innovative approaches to achieve our commitments. The solution lay in the establishment of extensive hedgerows comprised of a wide range of flowering and fruiting native species trees, which will have the beneficial effect of providing effective food and habitat for wildlife and greater linear connectivity to otherwise isolated habitats in the wider landscape. To complement the hedgerow creation, we have also trialled the creation of 'Miyawaki' planting at Penwortham, this is a technique that originates in Japan and replicates the processes of forest establishment in a natural environment. In essence, the process involved planting saplings at very high densities as would occur when seedlings germinate in a forest clearing, which then provide shelter and a microclimate for their counterparts, leading to the natural selection of the strongest trees. SP ENW are one of the only Network Operators to trial this method, which has the additional bonus of not requiring tree shelters which consequently reduces the requirement to dispose of waste. To further boost the wildlife value of the Penwortham site, the remaining grassland there will be managed with low intensity grass cutting techniques as outlined overleaf.

To complement the hedgerow creation, we have also trialled the creation of ‘Miyawaki’ planting at Penwortham, this is a technique that originates in Japan and replicates the processes of forest establishment in a natural environment. In essence, the process involved planting saplings at very high densities as would occur when seedlings germinate in a forest clearing, which then provide shelter and a microclimate for their counterparts, leading to the natural selection of the strongest trees

In conjunction with the tree planting over the 2024 / 2025 period, we are making positive and continued progress with our biodiversity uplift programme that is actively enhancing the greenspace habitat of over 100 of our network sites during RIIO-ED2. We continue to use our in-house operational teams to undertake practical management work that introduces a low intensity grass cutting regime to most of these sites, and, on the remainder, small scale woodland management. The grass cutting replicates traditional hay meadow management to encourage a greater diversity of wildflowers for the benefit of a wide range of pollinating insects. This grass cutting regime is now showing encouraging results, evidenced by a clear increase in native flowering species across many of our sites, particularly orchids including bee orchids at one of our sites near to Blackpool. We have begun our woodland management operations to increase the structural diversity of the trees present by selective thinning which is increasing light levels for woodland floor species.

The 2024 / 2025 period has also seen exciting developments within our biodiversity baseline, monitoring, reporting and opportunity tools. An Interim Review of our greenspace estate managed for nature has been recently commissioned and is nearing completion. The purpose of this is to demonstrate the significant progress against our ED2 Environmental Action Plan biodiversity targets and highlight further opportunities to develop the SP ENW Biodiversity Estates to deliver additional Nature Based Solutions. The interim review brings together within a user-friendly digital portal, web mapping application and technical guides, a portfolio of work undertaken in 2024 / 2025 including:

- Biodiversity site case studies with current ecological value surveys
- Estate natural capital and biodiversity baseline
- BNG corporate strategic plan
- Habitat carbon sequestration mapping tool
- Nature based solutions opportunities

The intention of the Interim Review is to not only focus the attention of stakeholders onto the high value and return of the SP ENW biodiversity programme, but in its largest part to influence at an early stage, the goal and direction of travel of biodiversity during ED3, to ensure longevity of habitat management on SP ENW’s estate.

12. Fluid Filled Cables

We have used fluid-filled cables since the 1960s as part of our extra high-voltage distribution network at 132,000 and 33,000 Volts. The fluid acts as an electrical insulator and will be either mineral naphthenic oil, linear alkyl benzene, or a mixture. In all cases the fluids have a low viscosity and colour, not unlike water.

Leaks from fluid-filled cables can occur for varying reasons including: cable damage by third party excavations; cable damage due to installation failure; failure of ancillary oil equipment such as pipe work, monitoring gauges and oil tanks; and cable joint failure. Whilst only a very small percentage of cables ever develop leaks, a leak can present a significant environmental risk if it is adjacent to a water course or an aquifer.

When leaks are detected, we respond in accordance with requirements, including response times, of the joint Environment Agency and Electricity Companies Operating Code on the Management of Fluid Filled Cable Systems Issue 3, 2013. Our strategy to address leakage from fluid-filled cables is to replace them with alternative modern fluid-free cabling and to respond quickly to leaks on legacy circuits.

We committed in our RIIO-ED2 business plan to maintain a leakage rate of less than 25,000 litres per year by 2028. In 2023/24 a total of 17,545 litres of oil was lost representing 1.8% of the total oil in service. We made improvements on performance in 2024/25 with a leakage rate of 15,610 litres that represents 1.6% of the total oil in service. We are committed to the removal of our fluid filled circuits and regularly engage with our stakeholders on how we target those replacements.

Our asset management strategy has identified circuits for replacement in both RIIO-ED2 and beyond as part of our long term plan to entirely remove this type of cable from our network.

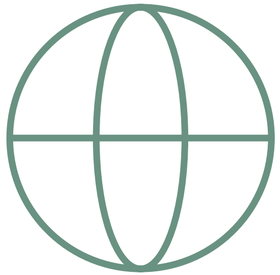
SP Electricity North West

13. Wider Environment & Other Activity

13.1 External accreditation

This year we have maintained our certifications to internationally recognised standards including:

- ISO 45001 (this is an international standard that specifies requirements for an occupational health and safety management system)
- ISO 14001 which covers environmental management systems and demonstrate our internal and external commitment to environmental improvement
- ISO 50001 for energy management systems



13.2 Helping customers and colleagues

Facilitating our customers' and stakeholders' ambitions towards achieving Net Zero is a key part of our strategy to get to Net Zero in the North West. We have successfully engaged with customers in the following areas:

Funding opportunities, engagement and campaigns

- We are supporting local communities to reduce, manage, generate and purchase their own energy. Community groups and organisations have been given a share of more than £80,000 to help support the region's energy needs through local community schemes. We have awarded more than £500,000 to 39 groups and organisations across the region as part of our 'Powering our communities' fund.
- Our 'Take Charge' campaign provides free impartial advice to help shape customers and colleagues future energy by identifying low carbon options for energy like solar, electric vehicles, heat pumps; and how funding can be accessed through appropriate grant options.

13.3 Customer vulnerability

- We are committed to supporting our customers ensuring that our services are available and accessible to all our customers, regardless of their personal circumstances and location, ensuring no one is left behind. We became the leading DNO for fuel poverty support offering free energy saving advice in partnership with Citizens Advice to provide energy and money advice our customers can trust.
- We delivered £8.55 million in benefits to 25,072 customers in just 12 months and achieved a satisfaction rating of 95.3%.
- We have increased awareness of our Extra Care Register to ensure that households have extra help and support during a power cut. We have made additional funding available for charities and organisations with £1.4 million available over the next five years.

13.4 Climate resilience

- The effects of climate change have led to some dramatic weather patterns in recent years. Storm Desmond in 2015 caused flooding at Lancaster's major substation leaving more than 60,000 customers without power. In 2024/25 we felt the impact of several named storms that had a significant impact on our network. We are committed to making our network more resilient to the potential impact of climate change and improving flood defences to our major substations including 1 in a 1000 year resilience for those serving more than 10,000 customers.

13.5 Engaging with our stakeholders

- Stakeholder engagement is critical for how we ensure that we are serving the needs of our customers in the North West. We know that engaging with our stakeholders will deliver better long-term outcomes for us and our region.
- We are an integral part of the North West and play a key role in the development and delivery of the ambitions of the region. As the way we live our lives continues to change and the demand on energy increases we know that we need to engage with our stakeholders to help them live their lives, run their businesses and grow in the best way possible to secure a low carbon future.
- Our stakeholder advisory panels are an integral part of our Stakeholder Engagement Strategy and are made up of key stakeholder organisations and individuals that provide insight into our stakeholders' priorities and help influence our business decisions.
    - The Environment and Sustainability Advisory Panel consists of environment and sustainability experts who provide advice, guidance and oversight of our sustainability performance. The panel has an independent chair and the aim of the panel is to inform our decisions on how we manage and alleviate our environmental impact within the region by providing feedback on environmental issues that we should prioritise as a business.

SP Electricity North West

14. Appendix

14.1

We have included data on our 2024/25 environmental commitments in the following areas: business carbon footprint, SF_6, electricity distribution losses, supply chain management, resource use and waste, visual amenity, noise pollution, PCB and fluid filled cables in the Annual Environment Report KPI tracker, you can view the data here: Environment report (enwl.co.uk)

14.2

You can access the following documents for 2024/25 on our website on the link above:

- Regulatory Reporting Pack and Commentary
  - 2024/25 Environment and Innovation Reporting Pack
  - 2024/25 Environment and Innovation Commentary
- Cost Benefit Analyses (Losses)
  - 2025 CBA for Theft of Electricity v1
  - 2025 Install 300sqmm vs 185sqmm HV Cable
  - 2025 Install 300sqmm vs 185sqmm LV Cable
  - 2025 Proactive 1000kv GMT Replacement
  - 2025 Programme 23MVA Replacement 2
- Smart Meters
  - RIIO-ED2_Cost Benefit Analysis_Template_Smart Metering FY25 V1.1

15. Glossary

Abbreviation	Meaning
BNG	Biodiversity Net Gain
C4FN	C4-fluoronitrile
CBA	Cost Benefit Analysis
CMS	Competence Management System
CORD	Central Oil Reprocessing Department
EAP	Environmental Action Plan
ENA	Energy Networks Association
EU	European Union
GMT	Ground Mounted Transformer
GWP	Global Warming Potential
HV	High Voltage
IIG	Insulation and Interruption Gases
kVA	Kilo Volt Ampere (unit of power)
LV	Low Voltage

Abbreviation	Meaning
NGET	National Grid Electricity Transmission
PCB	Polychlorinated biphenyls
PMT	Pole Mounted Transformer
SBTi	Science-based target initiative
SF_6	Sulphur Hexafluoride
tCO_2e	Tonnes Carbon Dioxide equivalent

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