

Nicola Cocks
Head of Programme Management
The Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE

98 Aketon Road
Castleford
West Yorkshire
WF10 5DS
tel (01977) 605938
fax (01977) 605811

Via email

20 June 2008

Dear Nicola

**ELECTRICITY DISTRIBUTION PRICE CONTROL REVIEW: INITIAL CONSULTATION
RECONCILIATION OF RESPONSE TO QUESTIONS RAISED**

CE Electric UK provided a response to Ofgem on the initial consultation on 16 June 2008. In order to assist Ofgem in reviewing our response to the initial consultation I attach a series of tables that link the questions raised by Ofgem in the consultation document to the relevant areas of our reply.

You will note that we identified each of the 'supplementary questions' that were contained in the body of the Ofgem document. Where appropriate we have linked these supplementary questions to the main questions that appeared at the start of each main section. We made the linkages to cluster together similar topics and we recognise that there are other combinations that could also be deemed sensible. In effect, we are not suggesting that this is the only way to categorise the numerous questions asked and issues raised for what are often multi-dimensional topics.

I trust you will find this contribution useful in locating the information you require from our response. However, if you have any questions arising then please do not hesitate to make contact.

Yours sincerely,



Jim Cardwell
DPCR5 Programme Manager

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
2. Environmental issues				
2.1	Do you think that evolutionary or revolutionary changes are required to the role of the DNOs to ensure that distribution networks remain fit for purpose? If the latter, in what specific areas does this apply?	2.1a Table 2.1 (also para 2.28) Roles & responsibilities Is there a role for DNOs around the interface with transmission? If so, what are the possible developments in this area and how will it interact with DPCR5?	Para 4 to 9	Paras 27 to 34
		2.1b Para 2.28 We invite views on the range of likely developments in this area (<i>interface between transmission and distribution facilitating DG</i>) over the period of DPCR5 and what proposals the industry are currently considering or are likely to consider. If implemented, how would these proposals impact the DNOs? Is there a need to take this into consideration for DPCR5 and if so, how?		Paras 27 to 34
		Energy efficiency 2.1c Para 2.41 The role of engaging with customers on energy efficiency is currently largely considered a role of energy suppliers. Can DNOs contribute to providing energy efficiency advice to customers? Should DNOs be incentivised to take a more proactive role with end consumers on energy efficiency, and if so how?		Paras 52 to 59
		Heat networks 2.1d Para 2.38. However, we recognise that distributors will be key partners in the connection of these new developments and they are in a strong position to support local communities on the electrical aspects of the connection. With the potential social and environmental benefits created by community energy schemes we consider that a more active role for the DNOs' in facilitating the connection of these schemes should be explored. We welcome views in this area.		Para 9 Para 55 Para 59

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
2.2	Do you think that we have identified the key areas where DNOs can facilitate activities that have a positive impact on the environment?	2.2a Para 2.47 Is there more that DNOs should be doing to encourage efficient use of their network or are the current measures appropriate? For instance is there scope for DNOs to do more to educate their customers on the impact of poor power factor?	Para 6 Paras 52 to 59	Paras 52 to 59
		2.2b Para 2.77 Should the scheme (<i>network undergrounding for visual amenity in AONBs</i>) continue for DPCR5? Should undergrounding be fully funded by the scheme or is it appropriate for DNOs to contribute funds? Should allowances be based on a uniform proportion across all DNOs as now, or is it appropriate to allow some flexibility in these amounts depending on stakeholder buy-in and DNOs' business plans?		Paras 90 to 97
		2.2c Appendix 7 para 1.74. (<i>Reference to undergrounding mechanism in AONB</i>) The mechanism is limited to AONBs and National Parks. We invite views on whether there are other protected or conservation areas that could benefit from the mechanism.		Para 91
		2.2d Appendix 7 para 1.75. (<i>Undergrounding in AONB</i>). Views are welcome on the above and any other potential areas for further development.		Paras 90 to 97
		Emissions 2.2e Para 2.66. The scope of the transmission incentive on SF6 emissions is set out in the TPCR Final Proposals. We welcome views from respondents as to whether a similar scheme is required for electricity DNOs and whether there are any reasons why this should differ from the transmission scheme.		Para 83
		Fluid-filled cables Para 2.72. Based on the data available, we invite views on whether this is an area where an incentive should be focussed noting that data specific for sensitive areas, which is one of the main concerns regarding fluid-filled cables, is not currently reported to Ofgem by the DNOs.		Paras 84 to 89

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
2.3	How do we ensure progress is made on the issues identified with the connection of DG? Should progress be facilitated through a working group or should more formal obligations be developed?	2.3a Table 2.1 (also para 2.9) DG incentive We invite views on the effectiveness of the current DG incentive.	Paras 41 to 46	Paras 10 to 23
		2.3b Table 2.1 Connections How do we ensure progress is made during 2009 with: <ul style="list-style-type: none"> • A national standard connection agreement • Reviewing the proportionality of ER G/59 & ER G/75 • A national connections process 		Paras 41 to 43
		2.3c Para 2.17 Have we identified the connection issues and the areas where DNOs need to do more? If so, how should we go about enabling development in these areas?		Paras 10 to 23
		2.3d Table 2.1 Commercial <ul style="list-style-type: none"> • We remain concerned about the cost-reflectivity of UoS charges to DG and the barrier this might present to the connection of DG. • How do we address the current lack of cost signals to generators that connected pre-April 2005 that currently do not pay UoS charges? (also para 2.32) • We invite views on the framework of the current DG incentive and the possible distortions this is creating on more cost reflective charges for DG. (also para 2.33) 		Paras 24 to 26
2.4	Do you agree that DNOs should have stronger financial incentives to reduce their carbon footprint? Do you think that we have identified the key areas where it may be possible to do this?	Other activities 2.4a Para 2.78. It is likely that there are other activities associated with the operation of a DNO's network not identified above that impact on their carbon footprint, such as fossil-fuelled mobile generation. We invite views on what other activities could be considered as an activity associated with the operation of a DNO's network that impacts their carbon footprint.	Paras 60 to 89	Paras 74 to 82

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
		DNO business carbon footprint 2.4b Para 2.85. While at least some of the DNOs have been collecting data on their carbon footprint, it may be that the measures that are being utilised are not consistent or there might be gaps as well as issues on the allocation of emissions among businesses of the same corporate group. We invite views on these issues.		Paras 74 to 82
		2.4c Para 2.42. We need to assess the cost evidence and the level of uncertainty around load growth to consider whether its weighting within the price control is still appropriate. We seek views on the extent to which a kWh revenue driver is still appropriate.		Paras 71 to 73
		Current treatment of losses 2.4d Para 2.53. We invite views on how much of the reduction in losses can be attributed to actions by the DNOs through technical improvements to the distribution network.		Paras 60 to 70
		2.4e Para 2.54. <i>(With reference to inconsistencies between DNOs with respect to their methods to treat electricity consumed in their substations for heating, lighting and ancillary supplies)</i> One way to address this would be to take account of unmetered supply at substations in calculating the losses incentive. We would welcome views on this issue.		Para 79
		Future treatment of losses 2.4f Para 2.59. It is essential that any incentive is valued against recognised external benchmarks (such as the shadow price of carbon) and as detailed throughout this chapter we seek views on an appropriate benchmark value. We also invite views on whether the incentive rate should be fixed, variable, or indexed to a recognised index of wholesale electricity prices (with or without a further carbon adjustment) given the potential uncertainty in forward prices for energy and the cost of carbon.		Paras 74 to 82

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
2.5	How can the Long Term Development Statements be made more useful for DG and other users of the network?	(also para 2.16)		Paras 44 to 46
2.6	Is the current regulatory framework constraining a DNO's ability to facilitate low/zero carbon technologies and if so, what could be done to address this?	2.6a Table 2.1 (also para 2.19) RPZ We invite views on the possible extension of RPZ to include demand connections. We also invite views on whether RPZ should be extended more widely to include innovative ways of managing the network on an ongoing basis.	Paras 4 to 9	Paras 20 to 23
		2.6b Table 2.1 Active network management <ul style="list-style-type: none"> Are DNOs obliged and/or incentivised to consider non-network solutions before undertaking reinforcement works? Is there a potential conflict for DNOs in an ownership group that includes DG and storage plant? 		Paras 14 to 18
		2.6c Para 2.22 Is there sufficient incentive for DNOs to consider non-network solutions before undertaking reinforcement? Are there any particular constraints on the development of demand side management and storage solutions?		Paras 14 to 18
		2.6d Para 2.23. It may also be appropriate to develop more clarity around how payments to generators or demand customers that defer reinforcement are treated for regulatory purposes given that they are not traditionally treated as network costs. We invite views on whether there is clarity on the current regulatory treatment of such costs and what alternative treatments might create a greater incentive on DNOs to consider contracting with generators before undertaking reinforcement.		Paras 37 to 38

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
		2.6e Para 2.24. Moves towards DNOs contracting with DG and/or storage to manage constraints may create difficulties where the DNO is part of an ownership group that includes DG and storage as, in effect the DNO would be making payments to a related party for a service. This may disadvantage DG not affiliated with a DNO. One way of addressing this potential conflict may be to set an incentive for independent DNOs free from generation and storage interests. We invite views on this issue.		Paras 39 to 40
3. Customers				
3.1	Do the current regulatory arrangements deliver the levels of service that customers expect?	See section 3.6 below.	Paras 115 to 120 Paras 130 to 131 Para 143 Paras 147 to 148 Paras 157 to 170	
3.2	Is the focus and scope of the current regulatory arrangements correct and are there any gaps that need to be addressed?	See section 3.6 below.	Paras 121 to 170	
3.3	Are DNOs customer focused enough or should they be doing more to improve communication with customers?	See section 3.6 below.	Paras 151 to 156 Paras 168 to 169	
3.4	Is DNOs' financial exposure set at the right level and/or do we need to change the emphasis in certain areas?	See section 3.6 below.	Paras 121 to 150 Para 153 Paras 160 to 162	

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
3.5	Do you think we have identified the right issues and appropriate areas for development with the existing incentives?	3.5a Para 3.25. One potential drawback of the IIS is that it does not provide incentives for DNOs to improve service to customers who experience below average reliability of supply. We invite views on whether the IIS could be to provide these incentives.	Paras 121 to 150 Para 153 Paras 160 to 162	Para 150
		3.5b Para 3.26. Under the current IIS many DNOs have been very successful in reducing both the number and duration of interruptions, although in many cases this has led to an increase in short interruptions. We are keen to get respondents' views on whether this move from longer interruptions to short interruptions is desirable, and if not, what they would like to see altered. Para 3.28. We welcome views on the need and extent to which exceptional events are removed from the IIS.		Para 131 Para 136
		3.5c Appendix 7 para 1.7. (<i>Reference to the proposed treatment of LV interruptions as 'LV Total'</i>). We invite views as to whether this is an appropriate way to proceed and encourage respondents to suggest alternatives.		-
		3.5d Appendix 7 para 1.9. For benchmarking purposes, we will use data from a number of years to calculate an average. We are open to suggestions as to how many and which years' data should make up the average.		Para 132
		3.5e Appendix 7 para 1.23. (<i>Reference to CI/CML targets</i>) We also seek views on whether to continue to combine pre-arranged targets with unplanned targets.		Para 137

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		<p>3.5f Appendix 7 para 1.3.1. There is a need to examine the treatment for poorer performing DNOs that have the largest differences between their actual and target CI and/or CML. In DPCR4 an interruption cost allowance was given to each DNO. DNOs that were identified as being poorer performers were given a greater allowance based on costs associated with trying to bring their reliability of supply in line with the better performing DNOs. A potential problem with this approach is that performance in DPCR4 may be below that projected by the level of funding even though the DNOs have received the allowance. It is important that DNOs are not funded twice to make the same performance improvements. We invite views on the merits of having a similar mechanism for DPCR5 or whether in fact there are better alternatives to incentivise poorer performers.</p>		<p>Paras 134 to 135</p>
		<p>3.5g Appendix 7 para 1.44. <i>(Reference to payments for exceptional events made under the normal weather standard, which is uncapped)</i>. Whilst there have been no catastrophic events of this nature to date, we are aware of DNOs' concerns regarding this area and invite views on whether changes should be made to the one-off exceptional events mechanism and/or the uncapped nature of the normal weather standard for DPCR5.</p>		<p>Para 127 Para 136 Paras 139 to 141</p>
		<p>3.5h Appendix 7 para 1.44. We are interested to hear respondents' views on the level of the thresholds at which interruptions are currently excluded from the IIS. Should thresholds be raised or should a percentage of exceptional events be included in the scheme? Should a materiality test be introduced, in addition to current thresholds?</p>		<p>Para 136</p>

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3.6	We have raised some detailed questions throughout this chapter. We welcome views on these issues.	Quality of telephony response 3.6a Para 3.30. <i>(Reference to the annual Electricity Distribution Quality of Service Reports.)</i> We would like to explore the potential for eliciting more information from this contact opportunity. We are interested to hear respondents' views on whether we should amend the scope of the survey to cover broader views and experiences of customer service as opposed to just the quality of call handling.		Paras 151 to 156
		3.6b Para 3.31. We are also interested to hear views on whether there are other ways of encouraging DNOs to communicate well with their customers and local communities.		Para 153
		3.6c Para 3.32. <i>(Reference to reviewing telephony scheme and its current exclusion of customers dealt with by automated messaging.)</i> We would welcome views on possible approaches to take in this area (see Appendix seven for fuller discussion).		Para 154
		3.6d Appendix 7 para 1.56/1.57. <i>(Proposed assessed attributes)</i> <ul style="list-style-type: none"> • willingness of staff to help, • accuracy of the information provided, and • satisfaction with speed of response. We favour these particular attributes as we consider that they are easiest for respondents to assess and overall they provide a broad indication of quality. We welcome views on whether these are the most appropriate attributes to retain as part of the survey.		Para 155

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		<p>3.6e Appendix 7 para 1.59. <i>(Reference overall high score for quality of telephone response but dissatisfaction from 2006/07 surveys)</i> The main reason for dissatisfaction is 'Not enough/inaccurate information.' This should be viewed in light of the difficulties faced by the DNOs in providing exact details of aspects such as restoration times at the time of the customer call. Given this, we invite views on how the quality of information could still be improved.</p>		Paras 151 to 152
		<p>3.6f Appendix 7 para 1.61. <i>(Reference proposed pilot survey questions for customer satisfaction)</i> We are open to views on questions to ask and whether the questions should be consistent over time or if they could be changed in focus according to areas of interest.</p>		Para 156
		<p>Guaranteed standards of performance 3.6g Para 3.35. <i>(Reference to severe weather standard and normal weather standard)</i></p> <p>(i) Many of the current standards were set before DPCR4 and we would welcome views as to whether they still cover the right areas and offer adequate levels of compensation.</p>		Paras 139 to 150
		<p>3.6h Para 3.36. <i>(Reference to dealing with business customers requiring connections.)</i> Business customers are also felt to be better placed to negotiate directly with their DNO to achieve a level of service more suitable to their needs, without requiring major re-enforcement of the local network and the potential for smearing the costs across both domestic and business customers. We would welcome views on this matter.</p>		Para 147

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
		Complaint handling 3.6i Para 3.39. Respondents are also asked to consider whether an additional standard is required on DNOs in respect of complaint handling (As has been the case in gas). Views are invited as to whether such a standard is necessary in electricity to provide individual customers with enhanced protection.		Para 121
		Connections 3.6j Para 3.42. We seek views on whether Ofgem should progress further connections related changes through DPCR5 to further improve service to customers and support an emerging competitive market.		Paras 160 to 162 Paras 168 to 169
		3.6k Para 3.46. We have acknowledged that where competition exists, for instance in a particular market segment, a different approach could be adopted within the price control, as proposed through the recent GDPCR. However, the evidence to date and as detailed in our annual Connection Industry Review does not identify any segments of the connections market where competition is effective and our initial thinking would not be to change our approach at this time. Any change may also interact with some of the options identified above and we welcome views.		Paras 163 to 167
		3.6l Para 3.7. What do customers want? (stakeholder consultation). We invite DNOs to provide details of any research programmes they have engaged in and any relevant findings as part of this review process so that we can obtain a broader view of customers' expectations.		Paras 115 to 120
		3.6m Para 3.17. What do customers want? (Connections). We invite respondents to share data on the volume and categorisation of DNO complaints from their experience.		Paras 168 to 169

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
		3.6n Para 3.21 Consumer redress - Complaints handling. We are interested in respondents' views as to whether the scope of the new redress and complaints handling standards will be sufficient to provide adequate redress to electricity distribution customers.		Para 121
		3.6o Para 3.21. Consumer redress - Complaints handling. Respondents should consider whether a similar standard is required for DNOs or whether the new arrangements will adequately address DNO's complaint handling process.		Para 121
4. Networks				
4.1	Have we captured all the key lessons learnt from DPCR4 regarding cost assessment?		Para 173	
4.2	Is our approach to cost assessment appropriate?		Paras 174 to 179	
4.3	Are there alternative approaches to cost assessment that we should be considering?		Paras 180 to 194	
4.4	How might our approach to benchmarking be improved?		Paras 195 to 203	
4.5	Have we captured all the key issues for "networks"?		Paras 171 to 227	
4.6	Is our building block approach to forecasting appropriate?		Paras 177 to 178	
4.7	What is the scope for developing additional outputs measures and how can these be incorporated into the price control?	4.7a Para 4.80. Network outputs: As part of the overall price control settlement, and as network data improves, it may be appropriate for DNOs to commit to a wider package of outputs. We would welcome views on the scope and nature of outputs measures and how these can be incorporated into the price control. We would also welcome feedback on what measures we should take if DNOs do not meet the package of outputs to which they have committed and that which underpin their cost allowances.	Paras 219 to 220	Paras 219 to 220

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
4.8	What is the best way for DNOs to gain stakeholder input to their forecast business plans and how should Ofgem facilitate/incentivise this?		Paras 115 to 120	
4.9	Is the IQI and capex rolling incentive the best way to ensure realistic forecasts and efficient investment?		Paras 208 to 210	
4.10	How might the IQI and capex rolling incentive be improved or what additional measures could supplement them?	4.10a Para 4.79. As we are seeking to better integrate incentives across different areas of costs it may be appropriate to apply the IQI more widely, for example to network operating costs and engineering overheads. We would welcome views on the scope of the application of the IQI.	Paras 211 to 220	Paras 217 to 220
4.11	Should we aim to equalise incentives on network investment and business costs and how could this be achieved? <i>Linked to 5.10a.</i>		Paras 204 to 207	
4.12	Is the timetable realistic?		Paras 177 to 178	
Supplementary question	4.13 Appendix 7 para 1.79. (<i>Voltage quality</i>) In our view the impact of the proposed revision of EN 50160 appears to be much larger than the problem. The costs of adhering to tighter voltage parameter limits or new measuring intervals could far outweigh the benefits to consumers. We are currently investigating the ramifications of the EN 50160 review and would welcome views from respondents on current voltage arrangements and proposed changes.		Para 138	

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5. Financial issues				
5.1	Should Ofgem use its traditional approach to calculate the cost of capital or should other approaches be considered in order to provide the necessary incentives to invest?	5.1a Para 5.18 We are interested to obtain views on whether and how we should evolve our approach to setting the cost of capital or whether we should continue with our current approach.	Para 229	Para 229
		5.1b Para 5.10 We are interested in obtaining views on how, if at all, we should take account of MARS in setting the cost of capital.		Paras 267 to 270
		5.1c Para 5.31. The current licence arrangements for protecting against financial failure were put in place at DPCR4 and subsequently rolled out to all network licensees. We would welcome views in particular on whether the financial ring fence and the special administration regimes are expected to be, or will prove, adequate in the event of financial distress or the collapse of a network operator or of a controlling undertaking.		Para 253
5.2	In particular, should measures to protect DNOs from debt market volatility be considered, such as indexation of the cost of debt, or the use of reopeners at "trigger" levels of interest rates?	Debt indexation: 5.2a Para 5.18 We considered the use of debt indexation at GDPCR but concluded that it was a complex policy decision requiring consideration outside GDPCR. We consider that this consultation provides a suitable opportunity to seek views in the context of DPCR5. Is now the right time to visit this? If so, what are stakeholders' views? One of the benefits could be to match revenue allowances more closely to the evolution of the market cost of debt. Currently we make fixed, ex ante cost of debt allowances for the full five years of a control period. The debt indexation route could cause DNOs to feel that their decisions on their capital structures were being constrained?	Pages 48 to 49	Pages 48 to 49

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
		Debt triggers: 5.2b Para 5.18. Do recent transactions, particularly the sale of UUE, together with uncertainty in the markets, suggest that triggers may now be appropriate?		Page 49
		Equity injections (rights issues): 5.2c Para 5.18. Do we need to assess whether we need to facilitate equity injections? Or is this dealt with when setting the cost of capital so that only greater regulatory commitment and transparency is all that is required? Does this remain an issue given recent market transactions and the message to investors from our remaining listed network companies, where evidence indicates investors positively want to invest in RAV growth (one of the factors underlying the high MARs)?		Page 49
5.3	Should Ofgem make financeability adjustments or is this a matter for DNOs once the cost of capital is set?	5.3a Para 5.23. Under what circumstances, if any, should the regulator be making financeability adjustments?	Paras 239 to 242	Paras 239 to 242
5.4	Is it appropriate for Ofgem to be making commitments on investment and its financeability over the longer term?	Also para 5.23.	Para 237	
5.5	Should a mechanism for ex-post adjustments for major changes in the tax regime be introduced and, if so, how?	5.5a Para 5.41. We are interested to obtain views as to whether a mechanism for ex post adjustments for major changes in the tax regime should be introduced for DPCR5. This may benefit consumers or could increase revenues. Do respondents view this as increasing regulatory uncertainty; and are ex post adjustments appropriate in any circumstances?	Para 258	Para 258
5.6	Do respondents support the publication of a fully populated financial model?		Paras 247 to 248	

Ref	Main question	Supplementary questions	Main question paragraph ref.	Supp. question ref.
5.7	Should we calculate the DNOs' allowed revenues in a way that creates a smooth revenue profile over the course of the price control period and seek to reflect the level of costs expected in the last year of the control in order to reduce price changes from one control to another?	5.7a Para 5.30. At GDPCR, we consulted on the approach to profiling in the third consultation document. Respondents' views were mixed. We smoothed revenues at DPCR4, but not at GDPCR, where in any case the adjustments would have been small. We would welcome views on the pros and cons of profiling as part of DPCR5.	Paras 249 to 252	Paras 249 to 252
		5.7b Para 5.23. Are depreciation adjustments to accelerate cashflow appropriate and are they sustainable to meet our financeability goals over the long term?		Paras 243 to 246
5.8	What factors should we take into account when determining the level of gearing to assume?		Paras 262 to 263	
5.9	Do respondents agree with the proposed treatment of net debt and gearing in ex post adjustments to tax allowances?	Embedded debt: 5.9a Para 5.18. Should we revise our approach to average cost of debt to take account of embedded debt costs or actual gearing in DNOs?	Para 261	Page 49
5.10 a	What are acceptable alternative approaches to calculating RAV additions; <i>Linked to 4.11.</i>	See para 5.43 also.	Paras 264 to 267 Paras 273 to 275	
5.10 b	Following recent market transactions, does RAV continue to reflect the underlying enterprise value of the business? <i>To answer in association with 5.1b.</i>	See para 5.43 also.	Paras 264 to 267	

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Supplementary Question	5.11 Para 5.44. At DPCR4, in modelling costs and regulated revenues, where there was no clearly identifiable cost, revenues from certain excluded services e.g. reactive power, were used as a proxy for costs. Such revenues were forecast by DNOs and, to take account of the variation between those forecasts and actual revenues, there is an adjustment whereby an element of RAV additions are reduced by the difference between forecast and actual revenues (used as a proxy for costs). We are minded to consider other methodologies to deal equitably with this provided that consumers are not adversely affected, and seek views on alternative approaches.		Paras 271 to 272	
6. Process and timetable				
6.1	Do you agree with the range of consultation approaches we intend to use throughout DPCR5?		Para 281	
6.2	Do you believe that we should utilise a consumer orientated challenge group to inform DPCR5?		Para 285	
6.4	Are there any other ways in which we should look to consult with interested parties?		Para 285	
6.5	Do you agree with our approach to publish specific impact assessments for key "important" decisions?		Para 286	
6.6	Are there any other key milestones that you believe we should consider for DPCR5?		Paras 282 to 283 Para 287	