

RIIO-2 Team  
RIIO Price Controls  
Ofgem  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

Date  
30 June 2021  
Contact / Extension  
Lynne Bryceland  
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Dear RIIO-2 Team,

**Consultation on the RIIO-2 Strategic Innovation Fund Governance Document (RIIO-2 Strategic Innovation Fund (SIF) Governance Document Consultation)**

This response is from SP Transmission (SPT) which holds the transmission licence for the south and central Scotland. SPT is part of SP Energy Networks (SPEN) and the wider Iberdrola group. We welcome the opportunity to respond to the RIIO-2 Strategic Innovation Fund (SIF) Governance Document Consultation. We are supportive of the introduction of the SIF and look forward to building on our track record of identifying and delivering innovative solutions to network issues.

SPT has comments on the draft RIIO-2 SIF Governance Document included by Ofgem in the RIIO-2 SIF Guidance Document Consultation, from both a policy and a drafting perspective, which are detailed in Appendix 1 of this response. References to drafting in the enclosed Appendix 1 are references to the draft RIIO-2 SIF Governance Document as issued by Ofgem on 2 June 2021.

We provide comments in this response on the draft RIIO-2 SIF Governance Document with a view to working with Ofgem to ensure that this condition operates fairly, consistently, transparently, proportionately and cohesively.

Our comments and this letter are submitted to Ofgem entirely without prejudice to SPT's rights, including those under the Electricity Act 1989, and SPT's ongoing appeal of the RIIO-T2 licence modifications to the Competition and Markets Authority. All of SPT's rights are reserved.

Yours sincerely,



Lynne Bryceland  
**Policy and Licence Manager**

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**Appendix 1 - RIIO-2 SIF Governance Document Consultation**

This Appendix 1 contains SPT's detailed comments on the draft RIIO-2 SIF Governance Document.

Reference Number	Paragraph	Comment	Proposed alternative drafting
1	1.17 and definition of "SIF Licence Condition" in Appendix 1	Reference to SPT should be to "SP Transmission plc"	Delete "SP Transmission Ltd" and replace with "SP Transmission plc"
2	3.2	What is the definition of an 'innovator'? This should be made clear.	
3	3.13 – 3.19	Without sight of the final form of the Data Best Practice Guidance, it is not possible to comment on the provisions that require us to follow that guidance or say, e.g. "as defined by and in accordance with the Data Best Practice Guidance".	
4	3.19	Confidential information/ commercially sensitive information should be expressly excluded from this right to require information sharing.	
5	4.7	Presumably 'innovator' here means the Funding Party as they are the party who must make the application? If that is the case, the reference to 'innovator' should be replaced with a reference to Funding Party. Note this comment applies throughout the SIF guidance (in particular Chapter 4 and 5) where it refers to the application process.	

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6	4.19	Typo "Lincensees"	Replace with "Licensees"
7	5.3, 5.4	Presumably 'innovator' here means the Funding Party as they are the party who must make the application?	
8	9.30	9.31 contains terms not used in 9.30 and 9.30 uses terms not defined in 9.31. Furthermore, we assume that Cck means NLCCk, and that ECK means NLECK, but this should not be left ambiguous in the Governance Document.	

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