

13 October 2022

Ofgem  
Attn: Mike Duncan  
10 South Colonnade  
Canary Wharf  
London E14 4PU

Ref: Response to RII0-ED2 DSO Incentive Governance Document Consultation

To Whom It May Concern:

With this response to Ofgem's RII0-ED2 DSO Incentive Governance Document Consultation, I would like to offer just one hopefully constructive suggestion.

As drafted the document is quite good and well thought through. But I observe at least one key group of stakeholders have been left out.

In Appendix 6 – Glossary, DSO Stakeholder is defined as, "Individuals or organisations that affect or can be affected by the DSO activities of the DNO. They may have a direct or indirect interest in DSO activities, and their contact may be anything from daily interaction to occasional contact. A non-exhaustive list of DSO Stakeholders is provided in Table 3."

We note the phrase "non-exhaustive list" but feel the document would be more inclusive and encouraging of participation if it explicitly lists members of the supply chain that provide the DNO/DSOs with goods and services. Surely, they are stakeholders too with pertinent views.

This could be easily accomplished by adding one more row to Table 3 – "Technology and Service Providers." This Stakeholder Type should expressly encompass both a) large established BAU vendors and b) innovative SMEs.

We hope you find this response helpful.

Sincerely,



Clarke V Simmons, Managing Director  
Neuville Grid Data Ltd