

Mick Watson
Interim Chief Financial Advisor, Analysis and Assurance
Ofgem
10 South Colonnade
Canary Wharf
LONDON
E14 4PU.

By email only

25 May 2022

Dear Mick

Proposal to modify the Regulatory Instructions and Guidance

Thank you for the opportunity to respond to the proposal to modify the pensions RIGs. This response is on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. We are Great Britain's largest electricity Distribution Network Operator (DNO), dedicated to delivering a safe, secure and sustainable electricity supply to 8.5 million homes and businesses.

We have reviewed the documents that accompanied the notice and only have a small number of items of feedback as follows:

1. Guidance (pdf)
 - a. There is an un-numbered paragraph between 6.5 and 6.6.
 - b. Table 21.1, first row (EDE), the column reference should start at R bearing in mind the reasonableness review date will be set to 2023-24.
 - c. Table 21.1, middle two rows, column references should be J to AM.
 - d. Table 21.1, final row (PBAPA), this one correctly starts its column reference at L (J and K are formula set) but should end with column AM.
 - e. The list of appendices on page 77 needs tidying up.
2. Workbook (Excel)
 - a. Both tabs P1.6 and P2.6 have an issue with the formula in row 8. The formula will return #value if the period is greater than the repair period set. If the @ is removed from the formula, this seems to fix the issue.

We hope that this feedback is helpful. If you have further questions, please let Paul Measday know in the first instance.



Yours sincerely

A handwritten signature in black ink, appearing to read 'James Hope', with a stylized flourish extending from the end.

James Hope
Head of Regulation & Regulatory Finance
UK Power Networks

Copy Paul Measday, Regulatory Reporting & Compliance Manager, UK Power Networks
David Simpson, Senior Finance Professional, Ofgem