

Guidance - Draft

RIIO-2 Re-opener Submission Instructions and Guidance for Electricity Transmission, Electricity Distribution, Gas Transmission, and Gas Distribution Sectors

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This document provides instructions and guidance to the Electricity Transmission (ET), Gas Transmission (GT), Gas Distribution (GD), and Electricity Distribution (ED) network licensees. Its purpose is to enable network licensees to populate and submit the RIIO-2 Re-opener Data Template and supporting narratives for the RIIO-2 price controls period.¹

¹ The price control period runs from 1 April 2021 until 31 March 2026 for ET, GT and GD. The price control period for ED runs from 01 April 2023 to 31 March 2028.

Guidance – RIIIO-2 Re-opener Submission Instructions and Guidance for Electricity Transmission, Electricity Distribution, Gas Transmission, and Gas Distribution Sectors

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1. Introduction and general requirements

Background

- 1.1. The current price control model is known as RIIO (Revenue = Incentives + Innovation + Outputs). RIIO-2 is the second electricity and gas price control under the RIIO model. It includes a range of Uncertainty Mechanisms (UMs) that allow us to assess applications for further funding during RIIO-2 as the need, cost or timing of proposed projects becomes clearer. This ensures that consumers fund projects only when there is clear evidence of benefit, and we have clarity on likely costs and cost efficiency. These mechanisms also ensure that the RIIO-2 price control has flexibility to adapt as the pathways to Net Zero become clearer.
- 1.2. UMs allow us² to adjust a network company's allowances in response to changing developments during the price control period. Without these, network companies' allowances could be higher or lower than required. This could result in consumers facing higher costs than necessary or expose network companies to an unreasonable level of risk. Where the degree of uncertainty is too great to allow for an automatic mechanism, we set "re-openers" which will allow us to assess network companies' proposals robustly, once sufficiently accurate information is made available.
- 1.3. Re-openers are a type of UM that allow us to adjust a licensee's allowances (in some cases up and in some cases down), outputs and delivery dates in response to changing circumstances during the price control period.
- 1.4. The RIIO-2 Re-opener Submission Template is developed to facilitate our review of re-opener application submission and to ensure robust and efficient assessment process. The Template provides a standardised format of data submission that is to be used across the sectors and re-opener mechanisms.
- 1.5. This document provides instructions and guidance to the electricity transmission, electricity distribution, gas transmission and gas distribution network licensees.

² The terms 'we', 'us', 'our' refer to the Gas and Electricity Markets Authority. Ofgem is the office of the Authority.

- 1.6. The purpose of this document is to help licensees populate the RIIO-2 Re-opener Data Template for the RIIO-2 price control periods.
- 1.7. In line with the Re-opener Guidance and Application Requirements, the Licensees are to submit accompanying narrative alongside the Template (please see Chapter 9).

The RIIO-2 Re-opener Submission Template

- 1.8. The RIIO-2 Re-opener Submission Template is to be completed by network companies in the electricity transmission, gas transmission, electricity distribution and gas distribution sectors. It is to be used to report their RIIO-2 re-opener application submissions. The data will be used by the Authority in order to inform its assessment of the network companies' proposals and to determine the appropriate value of any additional allowances.
- 1.9. The template captures detailed data for the preferred option only. High level optioneering data are captured on the CBA tabs.
- 1.10. This guidance relates to the RIIO-2 Re-opener Submission Template version listed below and to any subsequent version of the RIIO-2 Re-opener Submission Template unless superseded by subsequent revision of this guidance:
 - RIIO-2_Reopener_Submission_Template_v0.4
- 1.11. Licensees are required to submit completed template to support all re-opener applications with exception of:
 - Large Onshore Transmission Investments (LOTI)³
 - Accelerated strategic transmission investment Re-opener (ASTI)⁴
 - Cyber re-opener mechanisms⁵

³ Special Condition 3.13 of the ET Special Conditions: Large onshore transmission investment Re-opener (LOTIAt and LOTIREt)

⁴ Special Condition 3.41 of the ET Special Conditions: Accelerated strategic transmission investment Re-opener (ASTIRt)

⁵ Special Condition 3.2 of the ET Special Conditions: Cyber resilience operational technology Re-opener (CROTt), Price Control Deliverable and use it or lose it adjustment (CROTREt); and Special Condition 3.3 of the ET Special Conditions: Cyber resilience information technology Re-opener (CRITt) and Price Control Deliverable (CRITREt).

- Other re-opener applications with Ofgem’s written consent

General requirements

1.12. The general requirements for completing the RIIO-2 Re-opener Data Template are listed below. These apply unless otherwise stated on a specific table or in the guidance below:

1. The licensee must take all reasonable steps to ensure the quality of its data. This will ensure all material respects are accurate, complete and fairly presented.
2. Where a table requires data that was reported as part of another regulatory submission, the licensee must report this data within its RIIO-2 Re-opener Data Submission Template. Each licensee is required to explain any material data revisions in its accompanying narrative.
3. The licensee must notify Ofgem of the likelihood of any significant revisions to improve data quality, e.g. if data is provisional due to cost uncertainty.
4. The RIIO-2 Re-opener Data Template tables are colour coded to reflect the action required. The colour key is as below:

Colour Key

Non-editable cell	abc
Ofgem input cell	
Company input cell	12.3
Calculation cell (sub-total)	12.3
Calculation cell (total)	12.3
Link from other sheet in workbook	12.3
Link from other workbook	12.3
Input not relevant	
Non input cell	

5. The licensee should enter or amend data only in ‘Company input cells’ and should not insert or delete rows or columns unless otherwise indicated as permitted on a specific table or in the guidance below, or unless otherwise agreed with Ofgem.
6. Where a reportable value is zero or not applicable to a licensee then a zero must be input rather than the cell being left blank.

Provision of cost data

7. For ED sector, all cost should be reported in 2020/21 prices. For other sectors, all cost should be reported in 2018/19 prices. This is to align with the price bases used in setting the RIIO-2 price controls.
8. All Cost data should be entered in £ million to a minimum of three decimal place, with historical financial values reconciling with the data submitted in accordance with relevant Regulatory Instructions and Guidance. Licensees are required to provide all actual financial data to the highest reasonable level of accuracy available from their source systems, and commensurate with the purpose for which such data is intended, taking into consideration the appropriate allocations that are necessary to complete the tables.
9. Unless otherwise indicated in the guidance or templates, financial values should be input as positive values.
10. Unless explicitly stated in this guidance, the cost category definitions set out in the relevant sector's latest Regulatory Instructions and Guidance (RIGs).

Provision of asset volume and intervention/workload data

11. Workload units and outputs should be reported commensurate with the purpose for which such data is intended, taking into consideration the appropriate allocations that are necessary to complete the tables. Workload and outputs should be entered in the unit of measurement set out in this guidance or in the template.
12. Workload volumes should be entered to one decimal place.
13. Unless explicitly stated in this guidance, the asset volume and intervention/workload definitions set out in the relevant sector's latest Regulatory Instructions and Guidance (RIGs).

Multiple Projects Submission

- 1.13. In the case of re-opener applications relating to multiple projects, there are three options available to the licensee:
 - Option 1: to submit multiple instances of the completed template, one for each project.

- Option 2: to submit a single completed template covering all the projects in aggregate, and utilising the supplementary data sheets to provide necessary additional levels of granularity at a project level.
- Option 3: a combination of Option 1 and Option 2.

1.14. The licensee should agree the appropriate submission option with Ofgem ahead of submission.

Structure of this document

1.15. This document is divided into sections reflecting the different component parts of the RIIO-2 Re-opener Submission Template workbooks. These are as follows:

- Chapter 2 provides instructions for the completion of the 'Admin' worksheets.
- Chapter 3 provides instructions for the completion of the 'Submission Summary' worksheets.
- Chapter 4 provides instructions for the completion of the 'Cost Section' worksheets.
- Chapter 5 provides instructions for the completion of the 'Asset Volumes Section' worksheets.
- Chapter 6 provides instructions for the completion of the 'Cost Benefits Analysis Section' worksheets.
- Chapter 8 provides instructions for the completion of the 'Risk Register Section' worksheets.
- Chapter 9 provides instructions for the completion of the 'Supporting Data Section' worksheets.
- Chapter 10 provides guidance on the explanatory narratives that the licensee is required to submit alongside their RIIO-2 Re-opener Data Submission.

Associated Documents

- Re-opener Guidance [Re-opener Guidance and Application Requirements Document: Version 3 | Ofgem](#)
- Final Determinations (ET, GT, GD) [RIIO-2 Final Determinations for Transmission and Gas Distribution network companies and the Electricity System Operator | Ofgem](#)
- Final Determinations ED [RIIO-ED2 Final Determinations | Ofgem](#)

Publication

- 1.16. Ofgem is bound by the requirements of section 105 of the Utilities Act 2000⁶ relating to the disclosure of information.
- 1.17. Ofgem recognises the value of improving transparency of information in regulating natural monopolies and we intend to continue to review to what extent to publish further disaggregated data and analysis alongside the RIIO-2 re-opener submissions.

⁶ [Utilities Act 2000](#)

2. Admin Section Worksheets

Purpose

1.18. These worksheets contain general administrative information including details of the licensee making the submission, the relevant template version and the submission version.

Overview of worksheets

1.19. The worksheets included within this chapter are:

Electricity Transmission	Electricity Distribution	Gas Transmission	Gas Distribution
<ul style="list-style-type: none">• 0.1_Submission_Info• 0.2_Contents• 0.3_Reference• 0.4_LkUp• 0.5_Submission_Version_History• 0.6_Template_Version_History	Same for all sectors	Same for all sectors	Same for all sectors

0.1_Submission_Info

Purpose and use by Ofgem	This worksheet helps facilitate version control, efficient analysis of data, sets out the price base and the colour key used to distinguish different data cell types within the workbook.
General requirements for licensees completing this worksheet	<p>The licensee must select company (licensee) name from dropdown list in cell B13 and enter submission version number and submission date in cells B15 and B16. The licensee is required to provide version of the CBA template used in cell B18.</p> <p>The licensee is required to assign a unique submission version number for each submission and re-submission.</p> <p>The licensee is required to select the 'Price Base'. All values and consequences of failure values reported</p>

	<p>through this template should be the same price base as the licensee's most recently approved rebased targets.</p> <p>Submitted files must be given the filename indicated in cell B17 and saved as an Excel Binary Workbook (.xlsb)</p>
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Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

0.2_Contents

Purpose and use by Ofgem	Lists all worksheets in the workbook. Check for 'Error' flags on individual worksheets.
General requirements for licensees completing this worksheet	<p>If the licensee has not utilised a supporting data worksheet (template section 6) then no licensee input required.</p> <p>Column E (Data Error Check) performs a check on each data sheet for any error flags. If an error is flag is found the text "Error" will be displayed against the relevant sheet(s). The licensee must not make any submissions with an 'Error' message in any of the Data Error Check cells.</p> <p><u>Supporting data worksheets</u></p> <p>Please see Chapter 8 Error! Reference source not found. below.</p>

Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A

Gas Distribution	N/A
Electricity Distribution	N/A

0.3_Reference

Purpose and use by Ofgem	Contains list of document titles and links for related materials.
General requirements for licensees completing this worksheet	No licensee input is required.

Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

0.4_LkUp

Purpose and use by Ofgem	Contains data for use in dropdown lists and other lookup values used in the template.
General requirements for licensees completing this worksheet	No licensee input is required. The licensee must not amend any of the data on this sheet unless instructed to do so by Ofgem.

Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A

Gas Distribution	N/A
Electricity Distribution	N/A

0.5_Submission_Version_History

Purpose and use by Ofgem	Will be used to help track changes between licensees' submissions.
General requirements for licensees completing this worksheet	<p>The licensee is required to provide as much detail as is practical on changes between submission versions.</p> <p>Details of the overall submission should be entered in the green cells, with table specific details entered in yellow cells. The licensee may add or insert as many green or yellow rows as required.</p>

Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

0.6_Template_Version_History

Purpose and use by Ofgem	Contains details of changes to the template.
General requirements for licensees completing this worksheet	The licensee should not make any entries on this worksheet unless instructed to do so by Ofgem.

Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

3. Summary Section Worksheets

Purpose

- 3.1 Provides a summary of data submitted by the licensees in a format that is consistent across sectors.

Overview of worksheets

- 3.2 The worksheets included within this chapter are:

Electricity Transmission	Electricity Distribution	Gas Transmission	Gas Distribution
<ul style="list-style-type: none"> 1.1_Costs 1.2_Outputs 	Same for all sectors	Same for all sectors	Same for all sectors

1.1._Costs

Purpose and use by Ofgem	Provides summary of the licensee's company and contractor estimated costs based on the data submitted within this workbook.
General requirements for licensees completing this worksheet	This worksheet is auto-populated and requires no direct input from the licensee.

Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

1.2_Outputs

Purpose and use by Ofgem	Provides details of the outputs that the licensees proposals are expected to deliver. This data will be used by Ofgem to help determine whether the proposals are delivering sufficient benefits to consumers to justify investment. In some cases the outputs will form the basis for Price Control Deliverables (PCD).
General requirements for licensees completing this worksheet	<p>The Licensee is required to populate workbook by selecting output type from dropdown list and providing output description in column B. The licensee is required to record output values in for RIIO-2 period.</p> <p>The licensee should list all outputs that that the proposals are expected to deliver. For example, if an ETO is uprating an overhead line it might facilitate additional generation capacity as well as a NARM Monetised Risk Benefit. In this case the ETO should enter both as outputs.</p> <p>If the licensee proposes for any of the outputs to be used as a PCD then it should select "Yes" from the dropdown list in the "Proposed PCD" column, otherwise "No" should be selected.</p>

Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

4. Costs Section Worksheets

Purpose

- 4.1. Input sheets for the licensee to submit relevant cost data. Forecast costs should be net of efficiencies that licensees expect to deliver.
- 4.2. Licensees are required to provide appropriate split on each worksheet between direct and indirect costs, as well as split of costs between costs incurred or expected to be incurred by the licensee itself (Company Costs) and those incurred or expected to be incurred by third parties and charged to the licensee (Contractor Costs).
- 4.3. Each worksheet contains standard cost sub-categories as well as free text rows for licensees to utilise to record any costs that do not fit into the standard sub-categories.
- 4.4. Licensees should apply the category definitions as per the definition that most closely aligns with the relevant cost category in the relevant sector RIGs. Where not defined in the RIGs then the licensee must provide the definition that it has applied as part of its supporting narrative.
- 4.5. Where a licensee has utilised a free text row, then it must provide associated definition as part of its supporting narrative as well as explanation of why the costs did not fit into one of the standard sub-categories.

Overview of worksheets

- 4.6. The worksheets included within this chapter are:

Electricity Transmission	Electricity Distribution	Gas Transmission	Gas Distribution
<ul style="list-style-type: none"> • 2.1_Asset_Direct_Costs • 2.2_Procurement • 2.3_Land_Consents_and_Wayleaves • 2.4_Legal • 2.5_Detailed_Design • 2.6_Project_Management • 2.7_Commissioning • 2.8_Risk_and Contingency • 2.9_Maintenance_and_Operating • 2.10_Business_Support_Costs • 2.11_Other_Costs 	Same for all sectors	Same for all sectors	Same for all sectors

2.1_ Asset_Direct_Costs

Purpose and use by Ofgem	Provides the licensee's estimated direct and closely associated direct asset costs in RIIO-2.
General requirements for licensees completing this worksheet	<p>The licensee is required to report its estimated direct costs (i.e. from 2021/22 to 2027/28), by Asset Category.</p> <p>The licensee should enter the relevant Asset Categories on sheet 3.1_Asset_Volumes before entering costs on this sheet. The asset category and asset description fields will be autopopulated.</p> <p>The licensee should enter its estimated direct costs associated with purchase and installation of assets for each asset category, excluding costs reported through any of the other 2_Costs_Section worksheets.</p>

Sector specific requirements

Electricity Transmission	N/A
Electricity Distribution	N/A
Gas Transmission	N/A

Gas Distribution	N/A
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[Table 2.2 and 2.3 instructions below are to illustrate format for these instructions. We will provide worksheet specific instructions in this format if necessary following consideration of the consultation responses].

2.2_Procurement

Purpose and use by Ofgem	Provides the licensee's estimated direct and closely associated indirect procurement costs in RIIO-2.
General requirements for licensees completing this worksheet	<p>The licensee is required to report its estimated closely associated indirect costs (i.e. from 2021/22 to 2027/28), by each procurement cost category.</p> <p>The licensee is required to provide the procurement cost category in column A (free text cells).</p>

Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

2.3_Land_Consents_and_Wayleaves

Purpose and use by Ofgem	Provides the licensee's estimated land, consent, and wayleave costs in RIIO-2.
General requirements for licensees completing this worksheet	<p>The licensee is required to report its estimated closely associated indirect costs (i.e. from 2021/22 to 2027/28), by each cost category.</p> <p>The licensee is required to provide cost category in yellow input cells in column A.</p>

Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

5. Asset Volumes Section Worksheets

Purpose

- 4.7. Input sheets for the licensee to submit asset volumes including additions, disposals, replacements and refurbishment.

Overview of worksheets

- 4.8. The worksheets included within this chapter are:

Electricity Transmission	Electricity Distribution	Gas Transmission	Gas Distribution
• 3.1_Asset_Volumes	Same for all sectors	Same for all sectors	Same for all sectors

• 3.1_Asset_Volumes

Purpose and use by Ofgem	Provides the licensee's estimated direct costs for asset categories.
General requirements for licensees completing this worksheet	<p>The licensee is required to choose relevant asset category from a dropdown list and provide a brief description of the asset category as well as number of units.</p> <p>The licensee is required to provide Total Volumes for Additions, Disposals and Refurbishments for each relevant asset category. For Replacement the licensee is required to enter both the associated Addition volumes, and the Disposal volumes (including where non-like-for-like replacement). The Replacement Volumes are calculated as: ['Additions' + 'Disposals'] x 0.5. In the case on non-like-for-like replacements this may result in half unit replacements.</p> <p>Where there is a mixture of new assets (Additions), Disposals (not associated with a replacement), and</p>

	<p>Replacements, then each should be recorded as separate line items with explanation entered into the description field.</p> <p>Licensees should apply the asset category definitions as per the definition that most closely aligns with the relevant asset category in the relevant sector RIGs. Where not defined in the RIGs then the licensee must provide the definition that it has applied as part of its supporting narrative.</p>
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Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

6. Costs Benefits Analysis Section Worksheets

Purpose

- 6.1. Input sheets for the licensee to list all considered options and compare them against Total Forecast Expenditure and Total NPV. Licensees are also required to provide engineering justification and reasoning as to why the options were or were not taken forward.
- 6.2. The data reported in these worksheets will be used by the Authority to determine whether the preferred option is the best solution from a consumer perspective.
- 6.3. These worksheets do not remove the requirement for licensees to complete and submit CBA template where relevant. This worksheet should align with the summary sheet in completed CBA template.
- 6.4. Licensees are free to use any CBA template to populate the CBA tabs within the submission template. The latest CBA template for the relevant sector should be used. The licensee must enter the title and version number of the CBA template that it has used in the relevant field on 4.1_CBA_Overview worksheet.

Overview of worksheets

- 6.5. The worksheets included within this chapter are:

Electricity Transmission	Electricity Distribution	Gas Transmission	Gas Distribution
<ul style="list-style-type: none"> • 4.1_CBA_Overview • 4.2_Options_Long_List 	Same for all sectors	Same for all sectors	Same for all sectors

• 4.1_CBA_Overview

Purpose and use by Ofgem	Provides the overview of options considered by licensee.
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General requirements for licensees completing this worksheet	<p>The licensee is required to list all options considered together with a brief description.</p> <p>The licensee is required to flag preferred option, provide both Total Forecast Expenditure and Total NPV, and engineering justification for each option.</p> <p>The licensee should provide detailed workings of the NPVs based on Payback periods (£m).</p>
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Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

• 4.2_Options_Long_List

Purpose and use by Ofgem	Provides the list of all options considered by licensee together with details described below.
General requirements for licensees completing this worksheet	The licensee is required to list all considered options together with description and reasons for rejection if the option was not taken forward.

Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

7. Risk Register Section Worksheet

Purpose

- 7.1. Input sheets for the licensee to log in all considered risks associated with the project and provide assessment of its impact.

Overview of worksheets

- 7.2. The worksheets included within this chapter are:

Electricity Transmission	Electricity Distribution	Gas Transmission	Gas Distribution
• 5.1_Risk_Register	Same for all sectors	Same for all sectors	Same for all sectors

• 5.1_Risk_Register

Purpose and use by Ofgem	Provides the overview of possible risks considered by licensee and their evaluation.
General requirements for licensees completing this worksheet	<p>The licensee is required to list relevant risks associated with its proposals, including risk ID, brief risk description and cause.</p> <p>The licensee is required to record status of the risk and rank its severity in accordance with the RAG (red, amber, green) rating system (red being the most severe risk, green the least).</p> <p>The licensee is required to provide basic risk assessment, including risk impact assessment, risk probability and estimated related costs.</p>

Sector specific requirements

Electricity Transmission	N/A
Gas Transmission	N/A
Gas Distribution	N/A
Electricity Distribution	N/A

8. Supporting Data Worksheets

Purpose

- 7.3. Four blank worksheets are provided for the licensee to submit any data necessary to support its submission.

Instructions for using supporting data worksheets

- 7.1. The licensee should, where possible, format and order the data on supporting data worksheet in way that is consistent with the preceding worksheets. Where relevant, data definitions and terminology used on these worksheets should be consistent with the preceding worksheets and with this instructions document.
- 7.2. If a supporting data worksheet is used, then the licensee must:
1. Rename the tab with a meaningful name. When renaming, the numbering system, i.e. 6.1, 6.2, etc should be retained. The tab name should not contain any spaces. Underscore character should be used in place of spaces.
 2. Overwrite the relevant tab name on worksheet 0.2_Contents with the new tab name.
 3. Overwrite the relevant worksheet title on '0.2 Contents' worksheet with an appropriately descriptive title.
 4. Delete the instruction box on the supporting data worksheet.
- 7.3. If a supporting data worksheet is used to calculate values to input preceding worksheets, then the inputs should be entered as links directly to the supporting data worksheet.

9. Accompanying narrative requirements

Purpose

- 7.4. Each licensee is required to provide supporting narrative documentation for its re-opener data submission.
- 7.5. Ofgem will use the information provided by the licensee in its narrative document as well as the data submitted through the RIIO-2 Re-opener Data Template, supplementary question responses, and other relevant sources to help to carry out robust assessment.

General Requirements

- 7.6. The general requirements are set out in the Re-opener Guidance and Application Requirements.⁷
- 7.7. We are not requiring the licensee to use a proforma template for its narrative submissions. However, the narrative submissions should, as a minimum, include the sections explaining the data as set out above in this Instructions document.

⁷ [Re-opener Guidance and Application Requirements Document: Version 3 | Ofgem](#)
