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Date  
18 April 2025  
  
Contact  
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Dear Ofgem,

### **Response to Ofgem proposal to modify the Re-opener Guidance and Application Requirements document, version 3**

This response is from SP Energy Networks (SPEN), representing SP Distribution (SPD), SP Manweb (SPM) and SP Transmission (SPT). We own and operate the electricity distribution networks in the Central Belt and South of Scotland (SPD) which serves two million customers, and Merseyside and North Wales (SPM) which serves one and a half million customers. We are also the Transmission Owner (SPT) for Central and South Scotland.

We welcome the opportunity to contribute to the Ofgem proposal to modify the Re-opener Guidance and Application Requirements document and Redaction Policy.

Whilst we understand the drive to standardise re-opener submissions, we have significant concerns regarding the timing of the introduction of the template, the suitability of the format for all re-openers, and misalignment with the Regulatory Reporting Pack (RRP) and Regulatory Instructions and Guidance (RIGs), in particular when the introduced Guidance for re-opener template population is not incorporated within the RIGs. It is crucial that any proposed changes are coordinated. Regarding the revised redaction policy, we don't believe this fully aligns with Ofgem's obligations in relation to the disclosure and publication of information under the Electricity Act 1989 and Utilities Act 2000.

### **Redactions Policy**

We support Ofgem's goal to publish information to ensure transparency, but this needs to be adequately balanced with the need to withhold information for legitimate purposes. In the context of re-openers, where companies have a duty to publish applications, our main concern is that Ofgem may now publish information which we wish to be redacted.

In this situation Ofgem needs to have adequate processes in place to take views from companies, before deciding to publish information which we believe should be redacted. It should be clear to companies what purpose a disclosure is being made for the purpose of (to ensure Ofgem are complying with the s.105 Utilities Act 2000 restriction) and we note that consultation is a requirement of section 48 (2A) of the Electricity Act 1989. We do not believe the current redactions guidance draft accurately reflects this legal requirement. Following our recent experience, for example, with Early Construction Funding (ECF) publication for the Eastern Greenlink 1 (EGL1) project and EGL1's delay event submission, we are inherently concerned over Ofgem's approach to redactions and would like to reiterate the importance of redacting commercially sensitive information. We have experienced both publication and near publication of commercially sensitive information in both of these instances.

### Proposals for new re-opener submissions template

We are concerned that the nature of many re-openers do not lend themselves well to this template, and for re-openers with more bespoke initiatives, Ofgem will need to be flexible on how it is used.

In Electricity Transmissions case, the timing of introducing a new re-opener template seems unwarranted. We are approaching the end of RII0-T2 price control whilst there are ongoing RII0-T3 discussions to define the re-openers. If it is to be introduced during T2, the template should at least align with the existing RRP requirements and RIGs.

Responses to specific consultation questions are included below in Appendix 1.

We would welcome further engagement on this matter should you require any further information or wish to discuss any elements of our response in greater detail. This could be addressed in the format of a workshop, and we believe it would be more efficient if Transmission and Distribution had specific re-opener templates, more tailored to the nature of the re-openers.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Lauren Logan".

Lauren Logan  
Head of Transmission Policy and Regulation  
SP Energy Networks

## Appendix 1: Responses to Consultation questions

### Questions related to the Re-opener Guidance and Application Requirements Document

*Q1. Do you have any views on the proposed revisions to the Re-opener Guidance and Application Requirements Document?*

No, the proposed revisions reflect introduction of Redaction Policy and Re-opener template adequately. The views on the content of proposed changes are included within the relevant question responses.

### Questions related to Appendix 12: Redactions Policy

*Q2. Do you agree that a more comprehensive Redaction Policy is required purposes explained in section 1 (Introduction) of the proposed Redaction Policy?*

No, we are comfortable with the current guidance in the Re-opener Guidance and Applications Requirements document. Our view is that the new proposed guidance is not fit for purpose, as it fails to reflect the statutory restrictions which apply to Ofgem's disclosure and publication of information, and is not required.

We note that Ofgem has stated in its consultation that the existing high-level guidance can potentially lead to inconsistent application of the policy. It is hard to assess the need for more comprehensive guidance without evidence from Ofgem that companies are taking different approaches to redaction, or redacting information unnecessarily. We aim to redact as little information in our re-opener submissions as possible, limiting our redactions to commercially sensitive data, or security.

*Q3. Do you have any views on the proposed approach as set out in section 2 (Approach to Redacting Information) of the proposed Redaction Policy?*

We offer the following observations on section 2:

- **Paragraph 2.1** We welcome the inclusion of reference to Section 48(2) of the Electricity Act 1989. However, Section 2A states that the Authority shall consult before deciding to publish, should also be referenced. Our view is that Paragraph 2.1 would benefit from the clarification that Ofgem will ask for the views of the people or persons the redactions relate to before making a decision to publish.
- **Paragraph 2.2** - states that Ofgem will seek to balance their obligations to consult alongside other considerations. As per clause 48(2A) of the Electricity Act 1989 Ofgem must consult, therefore, as this is not optional, it should not be included in the balancing of obligations. This reference should be removed.
- **Paragraph 2.3** Approach to redacting information:
  - the second bullet refers to the Competition Act 1998, but the footnote provides a definition of commercially sensitive information that does not appear in the CA98.
  - Footnote 5 should refer to "network companies' assets or activities" rather than "our" as this is Ofgem's policy.
- **Paragraph 2.5** Approach to redacting information: In cases where Ofgem proposes to publish a summary of redacted information, it would be beneficial to include text stating that the copy of the redacted document will be provided to the licensees for review prior to publication. There are concerns, based on previous experience, that confidential information could mistakenly be published in the absence of this review.

*Q4. Do you agree with the three proposed redactable information categories? Are there any other categories that should be considered?*

We agree with the proposed categories as a general guardrail, however, require flexibility to ensure that we are able to redact appropriately.

*Q5. Do you have any views on the redactable information category explanations set out in Annexes 1, 2, and 3?*

We offer the following views:

- **Annex 1** – Confidential Information, we suggest that reference should be added to the Energy Act 2023 too. This also applies to footnote 4.
- **Annex 2:** Commercially Sensitive Information

While we can understand Ofgem's concern that licensees could use NDAs to limit disclosure, we would propose removal of reference to legally privileged information. Legally privileged information refers to sensitive information shared between a client and their lawyer. It is different from an NDA (which is an agreement between parties). It would be entirely inappropriate if this was published and would undermine our fundamental rights of defence.

Our expectation is that confidential and commercially sensitive information is not published under this redactions guidance, however we do not believe that this is clearly stated. Additionally, we would urge Ofgem to consider our previous feedback<sup>1</sup> that aggregated information can still be confidential/commercially sensitive.

Reference to aggregated unit costs is made in this Annex. We are of a strong view that failure to treat even aggregated costs as commercially sensitive could have a detrimental effect on ability to provide value for money for UK consumers. How will Ofgem deal with a situation where there are only a small number of parties providing unit costs and individual costs could be surmised based on the aggregated outputs? We remain concerned that aggregating data will not always negate the commercial sensitivity.

*Q6. Do you agree that the existence of a Non-Disclosure Agreement (NDA) should, in itself, not be sufficient reason for redaction or non-compliance with the policy (as explained in Annex 2)?*

No, if an NDA is in place, we could be breaching its terms by providing this third-party information to Ofgem. To the extent that this is the case, and we have made reasonable effort for the counterparty to consent to disclosure of the information, it is our view that we should not be put at risk in this way. It would not be appropriate for Ofgem to limit our ability to engage openly with third parties under the protection of an NDA as needed.

*Q7. In your view, is the proposed scope of the redactions policy correct? Should it apply to all re-openers or should some mechanisms be excluded from scope?*

We agree that this policy should not apply to Cyber re-openers, as proposed by Ofgem. This should also be extended to Physical Security re-opener applications.

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<sup>1</sup> This and other points contained within this response, were highlighted to Ofgem in the two rounds of informal consultation provided on 6<sup>th</sup> September 2024 and 18<sup>th</sup> March 2024.

Although there are no further windows for physical security upgrade programme (PSUP) re-openers in the RIIO-T2 period, if this template is to be used for future price controls, this should also be excluded from the scope and any other potential re-openers of such nature. This should be revisited within RIIO-T3 to ensure all relevant re-openers are captured.

*Q8. Do you agree with the process as set out in Section 4 (Process for Publications) for (a) Ofgem's publications, and (b) licensee's publications?*

We offer the following views:

- **Paragraph 4.1(b)** states that Ofgem may ask the licensee for further evidence or explanation if it is unclear whether the redaction is necessary. As stated in our response to Question 3, this is contrary to S.48 2A of the Electricity Act 1989.
- **Paragraph 4.1 (c)** states that Ofgem may share draft versions of the documents with licensees to elicit their views on proposed redactions. We request that this wording is amended to ensure licensees views are sought every time, prior to publication.
- **Paragraph 4.2 (c)** sets out the procedure for where there is doubt whether any information falls within the policy, and licensee needs to seek advice from Ofgem. Clarity is sought on the timescales for Ofgem to provide this advice as this will need to be factored into regulatory deadlines. We have confidence in our ability to determine the detail for redactions.

*Q9. Do you have any views on the General Consideration set out in section 5 (General Considerations)?*

We offer the following views:

- **Paragraph 5.1** - We suggest adding a caveat here that Ofgem would only do this if this high-level information itself doesn't constitute confidential or commercially sensitive information.  
We also request that this section is amended to include a requirement to seek licensees' views prior to publication of this high-level information. We have concerns, based on previous experience, that without this review piece, commercially sensitive information could mistakenly be published.
- **Paragraph 5.3** – It is not clear to us why reference is made to s105 of the Utilities Act 2000 in the context of third-party data only, as this section applies to the disclosure of all information obtained under s105(l)?

#### Questions related to Appendix 13: Re-opener Submission Template, and Appendix 14: Instructions

*Q10. Please provide your views on the split between direct and indirect costs on each of the 2\_Costs\_Section worksheets.*

We offer the following comments:

- It should be recognised that there are differences in indirect cost treatment (e.g. contractor indirects) across DNOs, ETOs and GTOs, meaning a 'one size fits all' template may not be suitable.

- A wider review of the definition of direct and indirect cost categories to be incorporated in re-opener submissions is needed to ensure consistency of content across TOs and with the RIGs.
- Costs to acquire land for operational property (e.g. substations) also needs a wider review as there is no clear definition in the current RIGs. We believe it should be included as a direct cost. Once this has been defined, other related costs can be better categorised e.g. legal costs.
- There are a number of costs that could be direct or indirect e.g. detailed design costs, project management costs, and 'other costs'. Further detail has been provided in the feedback tables later in the document.
- It may be difficult to quantify exact indirect costs so we assume Ofgem would be happy with an estimate rather than line-by-line bottom-up costs, for example in the Storm Arwen re-opener we requested a % of direct costs to be provided as additional indirects, in line with load-related uncertainty mechanism (Indirects Scalar).

*Q11. Please provide your views on the split between Company Costs and Contractor Costs on each of the 2\_Costs\_Section worksheets.*

In some cases, it may be difficult to know at the time of a re-opener application if a programme will be delivered internally or by contractor. With this in mind, we request that Ofgem confirm we will not be held to the exact split that is put in the re-opener, and that there will be flexibility if the cost split differs following delivery.

*Q12. In your view is specific instruction required for any of the individual worksheets? Please provide as much detail as possible on what is required. We also welcome suggested draft text.*

Currently Appendix 14 does not include instructions for all categories included within the template and some of the instructions are unclear (for example, procurement costs). We would urge Ofgem to not deviate from the RRP requirements and associated RIGs and ensure the alignment when the template for the re-opener is created.

*Q13. Do you have any views on the overall structure and design of the Re-opener Submission Template?*

See Q14.

*Q14. Do you have any views on the scope and content of the Re-opener Submission Template?*

- We are concerned that the nature of re-openers does not lend themselves well to this template and, for re-openers with more bespoke initiatives, Ofgem will need to be flexible on how it is used. For example, it is not clear how we would have properly captured Storm Arwen proposals in this template. The Arwen re-opener contained several initiatives which each had various cost types, which in this template would have to be split up across different tabs, making it more difficult for Ofgem to approve/reject whole initiative costs. The volumes would also be impossible to record, e.g. generator volumes wouldn't be captured by the existing Volume tabs so that would only be captured under varying cost tabs.
- There are also other RIIO-2 re-openers that we believe would not be a suitable fit for this template (e.g. environmental re-opener, wayleaves, digitalisation, streetworks).
- We do not believe the timing is appropriate to introduce this new template during the final stages of RIIO-T2 as we are approaching the end of RIIO-T2 price control. Interactions with RIIO-T3 developments are unclear. If this template is to be used throughout RIIO-T3 then the timing of it is not appropriate given that the re-opener requirements and templates need to come through the RIIO-T3 License Drafting process.

- Throughout the template there are references to monetised risk, we are not sure why this would feature in the re-opener submission template.
- The template does not fully align with the RRP pack and RIGs. Please see our response to Q10 and feedback on specific issues related to the template detailed in the tables below. It is crucial that this is resolved so that licensees are not required to present the data in two different formats, and it could make reconciliation of costs and volumes with RRP returns difficult.

Feedback on specific issues related to Appendix 14 Re-opener submissions template instructions:

Location	Issue
1.12 General requirements	<p>10. "Unless explicitly stated in this guidance, the cost category definitions set out in the relevant sectors latest RIGs."</p> <p>This needs to be a limited derogation in exceptional circumstances to minimise confusion. Due to the nature of a re-opener submission and when it might occur, the reference to 'latest' should be amended to 'prevailing RIGs at the time of re-opener submission.' or similar terminology.</p> <p>This comment also applies to point 13 and should be applied to any similar clauses where relevant.</p>
Overview of worksheets	<p>0.1 Submission info: It appears that the submission information has no title for the submission or reference to the licence special condition (including sub-clause, where applicable) under which the submission is being made.</p>
2.1 Asset direct costs	<p>General requirements for licensees completing this worksheet: "the licensee is required to report its estimated direct costs i.e. from 2021/22 to 2027/28.</p> <p>It is not clear why this period is chosen for a re-opener submission. Whilst it may be understood that RIIO-T2 = 2022 to 2026 and ED2 is 2024 to 2028 this should be explicit.</p> <p>A re-opener assessment and decision for a project should be assessed on total project costs. For transmission, such costs could transcend price controls. Therefore, time period should account for this.</p> <p>"the licensee should enter the relevant Asset Categories on sheet 3.1 Asset Volumes before entering costs on this sheet. "</p> <p>For clarity, this should be noted in the respective worksheets to avoid confusion for preparers (as they could be different for each table).</p> <p>"Table 2.2. and 2.3 instructions below are to illustrate..."</p> <p>We request an opportunity to respond further on the development of these tables, particularly based on the absence of definitions and definitions that are contradictory to the RIGs.</p>
2.2 Procurement	<p>Under the terms of the RIGs this is a Business Support Cost (BSC) category type for transmission. If Ofgem is interested in the costs specific to the Procurement of a single (or multiple) projects associated with a re-opener submission this needs its own definition and exclusions etc.</p>



	<p>Purpose and use by Ofgem:  “Provides the licensee’s estimated <b>direct</b> and closely associated indirect procurement costs in RIIO-2.”  Should this read “direct”? current wording contradicts the General requirements for licensees completing this worksheet below where “only closely associated indirect costs” are included.</p> <p>The licensee is required to provide the procurement costs category...”  It is unclear, what the procurement cost categories are and where are these listed and defined?</p>
<p>2.3 Land consents and wayleaves</p> <p>General requirements for licensees completing this worksheet</p>	<p>The instructions state that “the licensee is required to report its estimated closely associated indirect costs...by each cost category”. This contradicts the RIGs as Land, consents and wayleaves are classified as Direct costs not Closely Associated Indirects. Only the annual wayleaves payments, administration of the wayleaves and the legal fees of obtaining them are Indirects. Cost template only allow to capture these costs as indirects which is not correct.</p> <p>It is our view that sections such as 2.4 Legal, 2.5 Detail design, 2.6 Project management, 2.7 Commissioning, 2.8 Risk and contingency etc. should be included in the guidance. Again, these are all considered CAI costs which contradicts the RIGs.</p>
<p>3.1 Asset Volumes</p> <p>General requirements for licensees completing this worksheet</p>	<p>The guidance states “The Replacement Volumes are calculated as: [‘Additions’ + ‘Disposals’] x 0.5”.</p> <p>For RRP, Asset replacement has 2 separate volumes for Addition and Disposal. We do not understand the method proposed to combine them like this in the proposed re-opener template. RRP guidance is to include additions where there is cost, so we would expect Replacement Volumes to just equal Additions, with Disposals similar to a memo.</p> <p>Asset categories should align with the asset categories included in the RRP pack to be consistent. These currently don’t full align. For example, Addition &amp; Disposal, these are here alongside Replacement and Refurbishment, which are all summed for Total. Only Addition &amp; Disposal are needed to align with existing RRP reporting. Additionally, the total only seems to only sum additions.</p>
<p>4.8 Overview of worksheets</p>	<p>In the table under column Electricity transmission: 3.1 Asset volumes</p> <p>Given the level of asset disaggregation, this should be fully reconciled with the prevailing RIGs for each licence sector to avoid use of Ofgem Asset Possibility (OAP) data subsets. This is to ensure consistency of information and avoid different mappings between submissions (eg re-openers, annual RRP, BPDTs etc).</p> <p>“the licensee is required to provide total volumes for additions, disposals and refurbishments....”</p> <p>Further clarity is requested regarding the above statement- these are distinct activities with different costs.</p> <p>“The replacement volumes are calculated as [Additions + Disposals] x 0.5” – it is our view that this may cause confusion and appears to be an open loop. If a re-opener submission identifies a new asset then it should be described as</p>



	<p>such (eg because of new technology). Where this is the case, Ofgem (outside the re-opener process) should engage with TOs to amend and update the RIGs accordingly and the earliest opportunity (eg timed to annual RRP RIGs reviews).</p> <p>This is a consideration for FACTS equipment because it is an area of expansion through innovation and the solutions can have a very wide range of asset unit costs.</p>
6 Cost benefit analysis section worksheets	<p>There are certain types of projects that do not require a CBA.</p> <p>As described in our RIIO-T2 Business Plan Annex 87, while most engineering justification papers have a Cost Benefit Analysis (CBA) aligned with the RIIO-T2 CBA model, projects in the following categories do not:</p> <ul style="list-style-type: none"> <li>• Live projects rolling over from RIIO-T1, since they have already initiated, with decisions made during the previous price control.</li> <li>• Customer connection projects, as the proposed approach is based on agreement with the connecting party as they will bear a sizeable proportion of the costs incurred.</li> <li>• TO Reinforcements associated with new connections, where the options considered are evaluated purely based on the lowest cost solution, which meets the project objectives, as the benefits are all comparable.</li> <li>• Projects justified through the Network Options Assessment Process as these are subject to an extensive and rigorous CBA process by the Electricity System Operator who can consider market options, and different options which may be offered by Transmission Owners</li> </ul>
5.1 Risk register  General requirements for licensees completing this worksheet	<p>“The licensee is required to provide basic risk assessment, including risk impact assessment, risk probability and estimated related costs”</p> <p>Our view is that this should not be a default requirement due to differing nature or the re-openers.</p>
9 Accompanying narrative requirements  ‘Purpose’	<p>Clarity required for 7.4 – is it referring to the documentation as set out in the guidance document, or are the licensees are expected to include the narrative alongside the template to explain the detail included within the tabs?</p>

Overall, definitions are required for any new cost categories, albeit we urge Ofgem not to deviate from RRP and RIGs to ensure consistency and transparency.

Feedback on specific issues related to the new template<sup>2</sup>:

Location	Issue
Cover sheet	On the “Cover” tab of the template, a comma is missing after “Electricity Distribution”
0.1 Submission info	The file is incorrectly named ‘RIIO1 NOMS Closeout’ in cell B17
0.4 LkUp	There is no price base for ED Monetised Risk
0.4 LkUp	There is no look-up available for ED (the selection of a DNO in Tab 0.1 results in #N/A errors in Tab 0.4)
0.4 LkUp	We believe there should be some Output Types (row 63 down) which link to ED e.g. assets for volume drivers. The asset list does need to be expanded for ED.
0.41 LkUp assets	The first 3 units in the Asset Category for ED are incorrect.
0.5 Submission version history	The Instructions on this tab indicate 2 colour cells for licensee to fill in (yellow and green), however on Tab 0.1 the Key instructs companies to only fill in yellow cells.
1.1 Costs	Is the drop-down menu missing from the columns?
1.2 Outputs	<p>It is necessary to choose an output type from the dropdown list, however the meaning of the output types it is not clear and there could be some cross-over, e.g. Assets (including Protection); Assets &amp; Civils; Assets (busbars).</p> <p>We request that guidance on how to count the output value should be included in section 1.2 of the "Appendix 14 Re-opener Submission Template instructions". Clarification would be appreciated on whether the output is counted when we energise it or when the project closes out.</p>
2.1 Asset direct costs	On sheet 2.1 rows 24-33 are linked to Sheet 3.1 –suggest that Sheet 3.1 should instead link to Sheet 2.1.
2.1 – 2.11	Row 16 formula is incorrect – this should sum total costs but only sums company costs.
2.3 Land costs, consents and wayleaves	<p>According to the RIGs, these costs are not CAI costs, so we believe we should be able to report them as Direct costs.</p> <p>Only the annual wayleaves payments, administration of the wayleaves and the legal fees of obtaining them are listed as Indirect costs.</p> <p>This table should also deal with Servitude/ Easement costs as they are relevant</p>

<sup>2</sup> This is non-exhaustive list and includes specific issues from initial review .

	<p>to a project and are a preferred way of securing network access rights. The costs to acquire land for operational property (e.g. substations) needs a wider review as there is no clear definition of treatment in the current RIGs. We believe that it should be included as a direct cost associated with the project that builds network assets on this land for purposes such as providing new generation capacity etc. Once this is determined other related costs can be better categorised.</p>
2.4 Legal costs	<p>Cost categories 'environmental' and 'compensation payments': according to the RIGs, these are not CAI costs so we believe we should be able to report them as direct costs.</p> <p>Land legal costs: we are not sure what the difference between the 'property', 'land' and 'substation' cost categories is. Definitions of these categories would be helpful.</p> <p>Planning costs: What is this intended to represent?</p> <p>(1) the cost to obtain planning permission (e.g. applications etc) or,</p> <p>(2) the cost to the project resulting from planning conditions (stipulated as part of the planning permission) associated with the project e.g. reinstatement of temporary works, noise amelioration, landscaping, visual amenity, biodiversity, compensatory planting etc.</p> <p>Similar comment applies to Consent costs</p>
2.5 Detailed design	<p>Not all detailed design costs are indirect costs – we believe this contradicts the RIGs. E.g. 'functional design' is an indirect cost, whereas 'detailed asset design' is an direct in the RIGs.</p> <p>Clarity is required on this is as it may lead to prejudicial treatment of companies with disaggregated delivery models, either across the range of activities or for specific areas.</p>
2.6 Project management	<p>Not all detailed project management costs are indirect costs – we believe this contradicts the RIGs.</p>
2.8 Risk and contingency	<p>Our view is that risk and contingency is a direct cost and not a CAI cost.</p> <p>The Risk and Contingency table would benefit from further review to better ensure consistency. It would be helpful to tailor it on a complexity and materiality basis for the projects that could appear through a re-opener eg &lt;£1m to &gt;£1Bn.</p> <p>Recently, Ofgem's T3 cost assessment team raised a question on R&amp;C pertaining to RIIO-T3 and stipulated what risk sources should be included and excluded in the assessment. It would be helpful to have a wider review between Ofgem and the TOs regarding the relevance of R&amp;C and application to a project.</p>
2.9 Maintenance and operating	<p>We consider that maintenance and operating costs should be a direct cost to be applied after the project output has been delivered.</p> <p>The inclusion of Maintenance &amp; Operating costs appears to be an anomaly for capital project assessment in this situation. Whilst it is relevant to the CBA, it is unclear why this table is included. In a five year price control it is unlikely that</p>

	material NOCs costs would arise and there would be a reset as part of the succeeding price control assessment.
4.1 CBA overview	On the ED2 template which all DNOs use (jointly developed by Ofgem and the DNOs) the NPV of the baseline is not reported. Instead, the relative NPVs of all other options with respect to the baseline are reported. Should the column “Total NPV” column be blanked out in the proposed re-opener template?
6 Supporting data	Supporting Data contains incorrect tab numbers (5.X instead of 6.X), and ‘risk register’ should be removed as it is now Section 5.
Procurement & Legal tabs	Procurement and Legal are Business Support Costs however they have separate tabs – we suggest these are combined