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Dear Eliska,

SSEN Distribution response to Ofgem's Notice of proposed modifications to Re-opener Guidance and Application Requirements Document¹

This response is made on behalf of Scottish Hydro Electric Power Distribution plc (SHEPD, referred to in our licence as 'SSEH') and Southern Electric Power Distribution plc (SEPD, referred to in our licence as 'SSES'). This response is not confidential.

We welcome the opportunity to provide our views on the proposed modifications to the Re-opener Guidance and Application Requirements Document ("Guidance"), which includes the Re-opener Guidance and Application Requirements Document: Appendix 12 - Redaction Policy ("Redaction Policy"), the RIIO-2 Re-Opener Data Submission Template for Electricity Transmission, Electricity Distribution Gas Transmission, and Gas Distribution Sectors ("Submission Template"), and the associated RIIO-2 Re-opener Submission Instructions and Guidance for Electricity Transmission, Electricity Distribution, Gas Transmission, and Gas Distribution Sectors ("Instructions"). We include a summary position below, and detailed responses in the following pages.

Redaction Policy

We support the development of a Redaction Policy and agree that much of the proposed approach and process make sense. We do, however, have several material concerns, which we have previously raised in response to Ofgem's February and August 2024 informal consultations on the document:

1. The process should include a commitment from Ofgem to a) engage with licensees in all cases where it proposes to publish information which has been presented as confidential, commercially sensitive or which may pose a risk to national security, and / or redacted, by licensees, and to b) share the draft final version of the relevant publication document(s) with the licensee with reasonable notice ahead of publication.
2. Ofgem should consider legislative, licence and / or industry document changes to permit disclosure to / publication by Ofgem of confidential information by licensees, without them risking legal repercussions under Non-Disclosure Agreements (NDAs) or confidentiality agreements.

¹ [Notice of proposed modifications to Re-opener Guidance and Application Requirements Document | Ofgem](#)

3. The Redaction Policy should include a dispute resolution process as a last resort to determine on the treatment of sensitive information where this has not been resolved through discussion between Ofgem and licensees.

Given the potential material impact upon licensees of not adopting these changes, we would welcome Ofgem's explicit assessment of them in its consultation response.

Submission Template and associated Instructions

We understand Ofgem's intention to collate key information together in one document. If the Submission Template is to be used, we recommend full alignment with the RIGs and CVR pack in terms of category types, definitions and structure for consistency and ease. Reporting the same or similar information in multiple different views for various Ofgem submissions increases the risk of error or misinterpretation on both sides. We would therefore welcome Ofgem's consideration of how templates such as these can be automated to interface with the existing suite of reporting requirements (i.e. CBAs, CVR RRP, PCFM Reporting) to avoid these risks and reduce regulatory burden.

Ofgem notes that it "intend[s] to continue to review to what extent to publish further disaggregated data and analysis alongside the RIIO-2 re-opener submissions". We emphasise that any information which is submitted by licensees as confidential or commercially sensitive within the Submission Template should be subject to consultation with licensees before publishing, in line with our position on the treatment of sensitive information under the Redaction Policy.

We would welcome clarifications on Ofgem's requirements and intent for some specific areas of the Submission Template, included in our detailed responses.

Finally, we note that there is a significant additional administrative burden on licensees introduced with preparing the Submission Template. In re-opener applications submitted to date, we have taken care to meet Ofgem's information requirements set out in the existing Guidance. The use of the Submission Template may replace some presentation of data currently included in the core narrative documentation of our re-opener applications, but in most cases, it will duplicate this.

We would welcome confirmation as to when the Redaction Policy and Submission Template are expected to be in effect, given the ongoing work to prepare re-opener applications due over the course of the next year and ahead of January 2026 in particular.

We would be happy to discuss further any of the points we have raised in our response.

Yours sincerely,

Rachel Kettles

Regulation – SSEN Distribution

Consultation questions

Re-opener Guidance and Application Requirements Document

Question 1. Do you have any views on the proposed revisions to the Re-opener Guidance and Application Requirements Document?

The revisions are clear and make minimal changes to the Guidance to incorporate the new appendices.

Appendix 12: Redaction Policy

Question 2: Do you agree that a more comprehensive Redaction Policy is required [for the] purposes explained in section 1 (Introduction) of the proposed Redaction Policy?

We agree that a comprehensive Redaction Policy is required, to ensure a clear and workable approach to the treatment of sensitive information. In principle we are willing for more information to be shared publicly to ensure transparency and increase trust in the energy industry.

We do, however, have several material concerns with the existing Redaction Policy on which we would welcome Ofgem's specific response, given the potential material impact upon licensees of not resolving these points. These are set out in the following sections.

Question 3: Do you have any views on the proposed approach as set out in section 2 (Approach to Redacting Information) of the proposed Redaction Policy?

While the "Approach to Redacting Information" sets out that the Authority will assess the extent to which information would or might seriously and prejudicially affect the interests of a particular individual or body of persons, there is no clear stage in the Redaction Policy, as currently drafted, at which Ofgem shares that assessment with licensees. We consider that this additional stage is required in order to bring the process in line with the Electricity Act 1989 Section 48², particularly clauses (2) and (2A). This requires the Authority to "have regard to the need for excluding, so far as that is practicable, any matter which relates to the affairs of a particular individual or body of persons... where publication of that matter would or might, in the opinion of the Authority, seriously and prejudicially affect the interests of that individual or body", and that "Before deciding to publish under this section any advice or information relating to a particular individual or body of persons the Authority shall consult that individual or body".

This additional stage is the appropriate, transparent response to the licensee's original assessment of redactions. It provides the licensee with the opportunity to provide additional supporting evidence on its redactions, and it provides time to manage the impact of information being published which may have legal or other repercussions, e.g. to engage with third parties whose data may be released. Further to clause (2), Ofgem's assessment should take account of the benefits and impacts of public disclosure, by confirming how the published "information would promote the interests of consumers", and also clarify whether "publication... would or might, in the opinion of the Authority, seriously and prejudicially affect the interests of [an] individual or body".

The Redaction Policy as currently drafted is misaligned with the *legal* test of whether information should be published. Where information is provided to Ofgem, the decision as to whether information is confidential is a legal consideration, and not a regulatory decision or a matter of opinion. Further, while some information in question that is at risk of disclosure belongs to licensees, much of this information belongs to third parties. An example would be contractors carrying out building works to enable connections for customers, for DNOs and suppliers of plant and material for networks. Ofgem has no direct interaction with these third parties, and understandably has little knowledge of their concerns and priorities. It is difficult in such circumstances for Ofgem to assess fairly and reasonably whether

² [Electricity Act 1989](#)

publication of a matter (as per Section 2.1 of the Redaction Policy) “would or might seriously and prejudicially affect the interests of that individual or body”. The legal test is not whether “in the opinion of Ofgem” there is a risk of serious prejudice, but as a matter of fact whether there is an actual risk. Ofgem cannot know, and does not have the power to determine, whether there is an actual risk.

The *legal* test as to whether information is suitable for publication is not (as is suggested per Section 1.6 of the Redaction Policy) whether a publication would result in unwarranted economic harm to the licensee or industry, negatively impact competition, harm employees, identifiable individuals or raise public safety/national security concerns. The actual *legal* test is what type of information is prohibited to be disclosed by the relevant confidentiality agreement / NDA. The only way to improve the prospects of disclosure (in the majority of cases) is to change the law / licence requirements.

Ofgem’s proposed Redaction Policy risks ignoring the law and does not remove the potential for legal breaches. As a result, the Redaction Policy as currently written exposes licensees to lawsuits and potentially unlimited damages for confidentiality breaches. Our recommendations attempt to address this “gap” between our obligations to support Ofgem in its objectives to be transparent and promote the interests of consumers, and our obligations under the legal framework.

We emphasise that the consequences of releasing sensitive information may be severe to the party who has lost control of its protected information, and for licensees who may be placed in breach of their legal obligations.

Question 4: Do you agree with the three proposed redactable information categories? Are there any other categories that should be considered?

These categories seem sensible and should be sufficient, subject to the other points made in our response.

Question 5: Do you have any views on the redactable information category explanations set out in Annexes 1, 2, and 3?

In Annex 1 the legal test is not “information which Ofgem thinks might significantly harm the legitimate business interests of the undertaking to which it relates...”. As set out elsewhere in this response the legal test must be “information which as a matter of fact might or would harm the legitimate business interests of the undertaking to which it relates”. Where this information belongs to licensees, Ofgem should be transparent in its assessment of treatment of information with those parties ahead of publication, as we set out in our response to questions 3 and 8. Where this information belongs to third parties, Ofgem understandably cannot know the interests of third parties with whom it has no direct contact and so is not in a position to determine what would affect them. In this case, consideration should be given to legislative, licence and / or industry document change to permit the disclosure of this information, which would facilitate a more transparent sharing of information between Ofgem, licensees and third parties, and Ofgem should also confirm its treatment of redacted information before publication, to allow licensees to manage the impact of this in their engagement with third parties.

Please see our separate comments on NDAs in our responses to question 3 and 6.

Question 6: 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, we do not agree that this approach is legally correct. NDAs / confidentiality agreements are legally binding obligations supported by the full force of the law. Ofgem cannot simply choose to ignore those NDAs – they are binding legal commitments on licensees unless a relevant exemption permitting disclosure applies. The legal test is not that the “licensee must provide sufficient justification as to why non-disclosure would be in the consumer interest”. The legal test is that the licensee must demonstrate an exemption within the NDA / confidentiality agreement that

permits disclosure – if an exemption does not exist then, however undesirable it seems, disclosure is not permitted by law.

Many NDAs can be avoided where there is consent between parties, and where there is a legal or regulatory obligation to disclose the relevant information. Currently there is often no legal or regulatory obligation to point to permitting the disclosure of information; on the contrary, there are industry codes and legislation requiring confidentiality, for example DIN6 of the Distribution Code and section 105 of the Utilities Act 2000. If Ofgem's preferred outcome is to enable transparency and open data, it is likely that this legislation and the industry codes need to be updated. From our perspective this would facilitate a transparent approach, and would enable licensees to disclose information in a legally correct way. It may be sufficient (in many cases) for Ofgem to make licence changes to impose a legal sharing obligation, on the basis that many (but not all) NDAs / confidentiality agreements refer to "regulatory requirements" as an adequate exemption to permit information sharing.

Even where an exemption is applicable, most NDAs / confidentiality agreements provide that the party whose information is being shared against their will should be informed of the sharing in advance and given the opportunity to make representations about that disclosure, if necessary through the law courts. Disclosure without advance warning, as currently practiced by Ofgem and anticipated by this Redaction Policy, puts licensees subject to these agreements at risk of being sued and facing potentially unlimited damages where the disclosure has detrimental impact. This puts those licensees at risk of "unwarranted economic harm", which is unjustifiable in the context of Section 1.6 of the Redaction Policy.

Going forward, once the Redaction Policy is finalised, and where it is clear what kinds of information will be required to be shared, NDAs may be developed to exclude the requirement for confidentiality in relation to specific information which may, for example, be shared by licensees with Ofgem for publication "without further notice" to the relevant third party. However this does not alter the position for the numerous NDAs and confidentiality agreements already in place which will continue to bind for years to come. To ensure improvement, there needs to be absolute clarity as to what will be shared by Ofgem and when, so such sharing processes can be drafted robustly into future contracts.

Licensees are not being closed or un-cooperative when being bound by NDAs, to address the final paragraph of Annex 2 - they are simply complying with the law. However, as set out in this response there are ways to achieve Ofgem's aspirations which SSEN Distribution supports, which require some additional steps such as licence modification. It is progressing without these additional enabling steps that is our concern. Resolving the legal position first (e.g. by licence and potentially legislative and code change) to ensure the necessary exemptions to confidentiality can be met will allow in a considerable degree the greater transparency that Ofgem wishes to achieve and which SSEN Distribution in principle supports.

Question 7: In your view, is the proposed scope of the redaction policy correct? Should it apply to all re-openers or should some mechanisms be excluded from scope?

The proposed scope seems reasonable.

Question 8: 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?

The process in Section 4 requires two specific changes, as set out in our response to Question 3:

- 1) A **licensee consultation stage**, at which Ofgem shares its assessment of redactions with licensees, in line with the Electricity Act 1989 Section 48, to provide a transparent response to the licensee's original assessment of redactions, and to provide the licensee with the opportunity to provide additional supporting evidence on its redactions, to seek the consent of third parties to disclosure of their data, as envisioned at Section 5.2 (a), and / or time to otherwise manage the impact of information being published which may have legal, procurement or other repercussions. Section 4.1 b. and c. of the Redaction Policy currently include an option, but not a

commitment, for Ofgem to do this. At the bare minimum, a final version of the relevant publication should be shared with the licensee in good time before publication.

- 2) An additional final step for **dispute resolution**, as a last resort where Ofgem and a licensee have not reached agreement on treatment of redactions. As reflected elsewhere in our response, the Redaction Policy needs to recognise that confidentiality is a matter of law, not regulation, and that conflicts (although likely rare) will need to be resolved by the independent law courts. As currently drafted, reflecting on the points above, if there is no resolution of the treatment of redactions by discussion between a licensee and Ofgem, then the only option legally is for the matter to be tested by the law courts which have the ultimate decision-making power and authority in relation to legal matters. This means that where there is a dispute, Ofgem cannot disclose matters and must abide by the proposed redaction, unless and until the court permits that disclosure. We appreciate this is not desirable and therefore recommend licence / industry document changes to help widen the scope of exemptions that could be relied on.

Question 9: Do you have any views on the General Consideration set out in section 5 (General Considerations)?

Yes. In relation to its consideration of requests for redaction, Ofgem should commit to engage with licensees to share its view of redactions, per our responses to questions 3 and 8. If this step is missed, Section 5.2 (a) also cannot be met, as Ofgem may not be aware that redacted information relates to, or has been provided or produced by a third party, and the licensee will not be aware of the need to engage with that party to seek their consent.

At 5.1 where the Redaction Policy notes “Ofgem will aim to publish high level details (e.g. the total re-opener value, figures, and values against each work package”, we understand the drivers for the desire to publish this kind of information. Ofgem should, in any case, take account of whether the particular information has been redacted by the licensee, and the potential impacts of disclosing this information. For certain re-opener projects, high level values may still be sensitive if, for example, most of the project will be placed under contract to a single party and the procurement process has yet to start or is underway. In this case, Ofgem’s disclosure of cost data could give the supply chain insight into a licensee’s expectation or intention for a procurement process, and could influence pricing or negotiating strategies. This could have knock on implications for the overall cost of a project and/or our ability to deliver efficiently.

As set out more widely in this response, the decision as to whether a matter is confidential or not, with reference to information covered by NDAs / confidentiality agreements, does not lie with Ofgem. It is a legal obligation, not a regulatory decision. In these cases it is not for Ofgem to decide whether there is a good reason for disclosure or redaction – it is a matter of fact whether that document/piece of information satisfies the relevant legal tests. As a result where a licensee or other party identifies a document or piece of information as confidential, Ofgem does not have the power to unilaterally override that decision. Certainly, Ofgem can challenge what it is being told as unlikely/undesirable, and can test whether any helpful exemption applies, for example whether the party whose information is being shared would consent to that disclosure.

Appendix 13: Re-opener Submission Template, and Appendix 14: Instructions

Question 10: Please provide your views on the split between direct and indirect costs on each of the 2_Costs_Section worksheets.

While we agree with the premise of this consultation, aiming to provide Ofgem with standardised re-opener submissions, this level of disaggregated cost information is unlikely to be available at submission stage.

Depending on whether the contract is being delivered directly by us or as a turnkey project through a contractor, which we are unlikely to know at the stage of re-opener submission, we may not have this information available. This means that, at the stage of submitting a re-opener application, we may not be able to provide anything other than

estimates for the split between direct and indirect expenditure.

It is likely that the split between direct and indirect expenditure set out at submission stage would change depending on the most efficient delivery mix being identified. We would advocate that licensees retain the flexibility in identifying the most efficient method of delivery, including the split between direct and indirect expenditure and that it is important that any reporting requirements for re-openers remain consistent with the RIGs.

Question 11: Please provide your views on the split between Company Costs and Contractor Costs on each of the 2_Costs_Section worksheets.

Again, while we agree with the premise of this consultation, the templates need to consider nuances such as stage of delivery or procurement. The requirement for such a disaggregated level of cost reporting at re-opener application stage assumes that licensees are at an advanced stage of procurement and would have such information available. It is also important that Ofgem enables efficiency seeking behaviours by ensuring that licensees retain the ability to implement the most efficient delivery methods rather than this being determined by Ofgem at assessment stage.

We submit re-opener applications at various stages of delivery – from our best view of forecast costs before any procurement activities have taken place, to projects that we have built at risk due to their strategic importance and are almost complete at time of submission. If there is a requirement for licensees to report at the level of detail suggested here, it is likely that a significant number of broad assumptions may have to be made in order to provide it where projects are at an early forecast stage. The more assumptions that have to be made in order to fit the required breakdown structure of costs, the less useful this information may be for assessment purposes.

While there may be instances where we have this information available and can provide it in the format that Ofgem requires, it is unclear as to the purpose of this requirement. While within the price control Ofgem has a key role in setting outputs for licensees, it is generally understood, and incentivised, that licensees find the most efficient way to deliver that output. Whether that output is delivered by contractors or directly by the licensee is at the discretion of the licensee and should be driven by efficiency of output, not Ofgem's assessment of this split. We therefore consider that a move towards assessment of contractor vs. licensee delivery would be an inappropriate reduction in licensee agency, could weaken these incentives and signal a move away from the core principles of the RIIO framework.

Question 12: 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.

Yes, in the interests of accurate provision of requested data, further guidance would be welcome. We have noted some specific queries below. Our main suggestion is that Ofgem consider how the reporting requirements within this Submission Template interface with the existing reporting requirements in the CVR RRP, Load Index, etc. The proposed format of the cost tabs are not aligned to existing submissions which creates additional regulatory burden for licensees when completing the tables, and increases risk that various 'cuts' of data presented in different formats could lead to reconciliation issues. In an ideal world, the various submission templates would interface with each other in order to portray a clear narrative across all of our submissions and engagements with Ofgem.

- The **2_Costs_Section** of the Submission Template permits inclusion of direct and indirect costs for different activities. It is possible that licensees may legitimately incur direct costs driven by re-opener activities for a number of these categories, e.g. for Land Consents and Wayleaves (the current RIGs define "Servitude and easement payments to enable the direct activity to be performed" as a direct cost), Maintenance and Operating, and Risk and Contingency. We would also welcome guidance on how the information presented in 2.8_Risk_and_Contingency should interact with information provided under the 5.1 Risk Register tab. There is a typo in cell B39 in tab 2.1_Asset_Direct_Costs.

- The Instructions stated at Section 4.1., “Forecast costs should be net of efficiencies that licensees expect to deliver”. Does this refer to project-specific operational efficiencies, or the ongoing efficiency in line with RIIO-ED2 FDs?
- At **3.1_Asset Volumes**, it is not clear why Replacement Volumes are calculated as: [‘Additions’ + ‘Disposals’] x 0.5”, rather than the actual / forecast addition and disposal anticipated volumes? How does Ofgem propose to distinguish / divide costs in lines 16-18 between volume additions and disposals? Rates utilised for project costings are typically based on unit rates which wrap up the costs of both the asset addition and disposal. These cells also cross-reference from tab 2.1 which does not distinguish between addition or removal of an asset.
- In **4.1_CBA_Overview**, it is still not clear (there is no guidance) as to what is required in columns “Engineering Justification” (simply a yes / no as to whether an EJP has been submitted?), “Stakeholder Support Summary” and “TO View” – we would welcome clarification on this. Column E in this tab asks licensees to confirm the RRP Table spend area. This could be multiple tables – in this case, should the licensee describe this situation in the supporting narrative?
- The Instructions note that “Licensees are free to use any CBA template to populate the CBA tabs within the template. The latest CBA template for the relevant sector should be used.” This seems somewhat contradictory. We recognise that in some cases it may be appropriate to supplement and use of Ofgem’s latest CBA template for an alternative CBA, e.g. SHEPD’s use of the Strategic CBA for the latest HOWSUM application, to illustrate different costs and benefits or to analyse them in different ways. We would welcome confirmation as to how this approach would be treated in Ofgem’s assessment, if associated data is not readily transferable to the Submission Template.
- More guidance would be welcome on Ofgem’s information requirements for the **5.1 Risk Register tab**. For example:
 - What information does Ofgem require under “Risk Owner”? We assume this seeks to understand whether the risk sits with the licensee or a third party, rather than the name of a specific individual, which would have no meaning for the purpose of Ofgem’s assessment?
 - Under “Impact Assessment”, does Ofgem require a yes / no response, or data on the outcome of an impact assessment?
 - Under “factored P50 / P75”, again does Ofgem require a yes / no response that this analysis has been carried out, or data on the outcome of a relevant assessment?

Question 13: Do you have any views on the overall structure and design of the Re-opener Submission Template?

The Submission Template does not align completely with Distribution reporting and RIGs, and seems to have different categories to the Distribution CVR pack. The Instructions note “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”. We recommend the categories match those in annual reporting and, where possible, template submissions that Ofgem requires should interface with other submissions (for example, the subsidiary RIGs annexes feed into the CVR RRP directly through the Revenue Link Tables in the R5a tab). If the template follows the annual submission format as closely as possible, it would be helpful to understand if Ofgem is going to include this as part of the RRP review each year, and/or to ensure that changes to the CVR are reflected in this template if necessary.

As we mentioned in response to Ofgem’s previous consultation on the Submission Template, this should be ‘stress-tested’, and a dummy run version completed before use, to ensure its functionality is complete and that licensees fully understand how it works before formal use.

We flag again the disparity between the requirement that “All Cost data should be entered in £ million to a minimum of three decimal place[s]”, and the CVR pack requirement which is two decimal places.

We welcome Ofgem’s provision of some guidance on use of the Submission Template in the case of re-opener applications relating to multiple projects. In the absence of the provision of scenario-tested templates (for single and multiple projects) we cannot confirm our full and final views on the Submission Template until we utilise it fully.

Question 14: Do you have any views on the scope and content of the Re-opener Submission Template?

In the Instructions, Ofgem notes that “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”. We would expect that, in line with any CBA submitted as part of a re-opener application, the Submission Template is submitted and treated as confidential, and not normally published. On this basis, we refer to our positions set out on the principles of the Redaction Policy - we believe Ofgem should consult with licensees on this information before publishing it, in line with Section 48 of the Electricity Act 1989.

We note the value we place in engagement with Ofgem before and after application submission, including the SQ process, as a means of allowing licensees to present proposals and provide context to support applications where required. We acknowledge the potential for the Submission Template to reduce the need for SQs, but emphasise that implementation of the Submission Template should not lead to reduced constructive engagement between Ofgem and licensees around re-opener applications.

We understand the intention to collate key information together in one document, but also note the administrative burden associated with preparing the Submission Template, particularly where applications include multiple projects (for example future LRE re-opener applications). In our applications made to date we have sought to provide all data now requested in the Submission Template. Use of the Submission Template may replace some of how information has been presented to date, but will certainly duplicate it in many cases.

Given re-openers capture both incurred and forecast costs within RIIO-2, we consider additional years should be added (including “FY21/22” onwards for Transmission and Gas, and “FY23/24” onwards for Distribution), to allow licensees to provide data on views of estimated costs for those years.

In Ofgem’s recent determination on Physical Security re-opener applications³, we note Ofgem’s “policy to approve a flat rate of 7.5% risk allowance on most RIIO-2 re-opener mechanisms”. We understand that this value is based on averaging the risk and contingency allowance on individual transmission projects across the RIIO-ET portfolio. We would welcome confirmation of how Ofgem’s assessment of risk allowances relates to Distribution licensees, and how this would interact with the Guidance, the Instructions, and licensee presentation of information on risk in the Submission Template. We note that we have also engaged with Ofgem on the potential for further “extraordinary risk” associated with current market conditions, and would welcome Ofgem’s guidance on how that would be accommodated in the Submission Template.

Other comments

Appendix 14: Instructions

- **General requirements:** Ofgem notes that “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.

³ [RIIO-2 Physical Security Re-opener Final Determinations 2025 | Ofgem](#)

Each licensee is required to explain any material data revisions in its accompanying narrative” (Section 1.12, bullet 2). Does this require licensees to present both previously reported and current values for the same item?

- **Section 2. Admin Section Worksheets:** Note the referencing error at 0.2 _Contents, p.11.
- **Section 4. Costs Section Worksheets:**
 - At 2.1_ Asset_Direct_Costs (p.19) Ofgem notes, “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]”. We would welcome provision of specific instructions for all sections.
 - Note the paragraph numbering of Sections 2, 5, 8 and 9 does not match those section heading numbers.