

Guidance

ED3 Business Plan Data Table Commentary

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This document provides a template and instructions for providing supporting commentary for the ED3 Business Plan data tables and templates. It explains what information should be provided in the commentary, and where to find more information.

Guidance ED3 Business Plan Data Table Commentary

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1. Instructions and Guidance

Background

- 1.1 This document, the ED3 Business Plan Data Table Commentary (BPDTC), is a template for DNOs to provide additional information alongside the Business Plan Data Table (BPDT), to help:
- identify, explain, and justify the main drivers of forecast expenditure and volume profile across the ED3 price control period
 - explain and justify scenarios used for justifying the forecast workload volumes and costs across the ED3 period
 - explain any assumptions made in populating the tables how any allocations have been applied
 - explain any allocation methodologies applied, which haven't been detailed elsewhere in the business plan submission
 - assist Ofgem in the process of navigating the data submission and supporting documentation
- 1.2 This template should be read alongside the Business Plan data table instructions and guidance for ED3 and the ED3 Sector Specific Methodology Decision.

Instructions and guidance

- 1.3 Alongside the submission of the ED3 BPDT, DNOs must complete this BPTDC template for each worksheet in the BPDT. For each worksheet, where appropriate, include commentary on the following:
- summarise and explain the profile of the ED3 information
 - compare the current forecast across the ED3 period and the latest information on the historic and forecast position across the RIIO-ED2 period, and explain any material differences between them - please include information in terms of run rates, trends, unit costs etc and explain the reason for any material step change or difference
 - provide a justification for any unit cost/trend outliers, including any regional and/or site specific factors and where there is material interaction with other areas of the BPDT
 - explain the level of sensitivity within the forecasts used and clarify how uncertainty has been considered/tested. Indicate the materiality of these assumptions
 - explain any interactions with wider governmental policy
 - explain the types of internal and external benchmarking exercise (where applicable) that have been undertaken to support the ED3 forecasts (eg. internal tendered framework rates and/or international unit cost comparison)

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- cross-reference areas of the BPDT submission that can be used to further evidence or substantiate the submission (eg cells A:B of tab “X” of the BPDT or supporting document “Y”)
 - highlight any relevant additional information to aid Ofgem’s understanding and interpretation of the information
 - where costs have been apportioned across one or more activities, the basis of apportionment must be provided in the cost commentary document - please also give an indication of the robustness of those assumptions.
- 1.4 The BPDTC template is applicable to all worksheets in the final ED3 BPDT, except for any cover, contents or summary sheets, and some finance, asset and other sheets. If DNOs consider it necessary or useful to provide supporting information on any worksheet we haven’t requested commentary on, there is space for this at the end of this document. Each DNO must provide a commentary for each of the categories above. DNOs should report “n/a” where questions do not apply to the subject matter of the worksheet and should ignore any tables that do not apply to them.
- 1.5 The BPDTC must not exceed 3 pages in length for each worksheet, unless otherwise specified. Where visual representations of information (e.g. waterfall diagrams) may aid understanding these should be included and will not contribute to the page limit.
- 1.6 Where information that is relevant for the BPDTC is located in the main Business Plan submission or supporting files (eg engineering justification, CBA etc.); directions to the relevant information must be clearly signposted in the BPDTC. Where it is not possible to include all information as prescribed, DNOs will need to clearly explain the reasons why.
- 1.7 The appropriateness and materiality of the commentary provided should be at a level that minimises the need for Ofgem to ask supplementary questions.
- 1.8 DNOs should, to the fullest extent possible, ensure that the BPDTC contains all information relevant to Ofgem’s assessment of the plan. This includes providing a proportionate summary of the overall activity level experienced and costs incurred and expected by the DNO. The BPDTC must therefore provide overview information on the level of activity and costs across the RIIO-ED1 and RIIO-ED2 periods and the current BPDT forecasts for the ED3 period. Where a variance is observed in the transition between price control periods, a succinct explanation of the material differences between them and factors driving the variation is required.

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2. Data Table Commentary

2.1 DNOs must provide commentary for each BPDT worksheet using the templates below.

Finance Table Commentary

I1 – Universal Data

No DNOs input required.

I2 – Monthly Inflation

No DNOs input required

I3 – BPFM Inputs

Commentary

F1 – Debt from BPFM

Commentary

F2a – Financial Summary (TWA)

Commentary

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F2b – Financial Summary (YE)

Commentary

F3 – Fixed Rate Debt

Commentary

F4 – Floating Rate Debt

Commentary

F5 – Inflation Rate Debt

Commentary

F6 – Debt Dataset

Commentary

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F7 – Data Validation

No DNOs input required

F8 – Tax Inputs

Commentary

Cost Table Commentary

C2a – Connections

Commentary

C2b – Connections

Commentary

C3 – Physical Security

Commentary

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C4 - IT and Telecoms (Non-Op)

Commentary

C5 – Property (Non-Op)

Commentary

C6 – Vehicles and Transport (Non-Op)

Commentary

C7 - STEPM (Non-Op)

Commentary

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C8 - Remote Generation Opex

Commentary

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C9 - Core Closely Associated Indirects (CAI)

Commentary (up to 7 pages)

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C10 - Wayleaves (CAI)

Commentary

--

C11 - Vehicles and Transport (CAI)

Commentary

--

C12 - Core Business Support

Commentary (up to 7 pages)

--

Guidance ED3 Business Plan Data Table Commentary

C13 - IT and Telecoms (Business Support)

Commentary (up to 7 pages)

C14 - Property Management (Business Support)

Commentary

C15a - Atypicals Inside Totex

Commentary

C15b - Atypicals Excluded Totex

Commentary

C15c - Atypicals Non PC

Commentary

Guidance ED3 Business Plan Data Table Commentary

C16 - Smart Meter Outside PC

Commentary

C17 – Legacy Meters

Commentary

C18 – De Minimis

Commentary

C19 – Other Consented Activity

Commentary

C21 – Out of Area Networks

Commentary

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C22 – Pass Through

Commentary

C23 – Other NABC

Commentary

C24 – Related Party Margin

Commentary

C25 – Shetland (SSEH Only)

Commentary

C26 – Cyber Resilience

Commentary

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C27 – Severe Weather 1 in 20

Commentary

Cost and Volume Table Commentary

CV1a - Primary Reinforcement

Commentary

CV1b - Primary Reinforcement

Commentary

CV2a - Secondary Reinforcement

Commentary

CV2b - Secondary Reinforcement

Commentary

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CV2c – Off Gas Grid PCD

Commentary

CV3a - Fault Level Reinforcement

Commentary

CV3b - Fault Level Reinforcement

Commentary

CV4a - New Transmission Capacity Charges (NTCC)

Commentary

Guidance ED3 Business Plan Data Table Commentary

CV4b - New Transmission Capacity Charges (NTCC)

Commentary

CV5 - Diversions

Commentary

CV7 - Asset Replacement

Commentary (up to 10 pages combined with CV7a)

CV7a - Asset Replacement NARM

Commentary (up to 10 pages combined with CV7)

CV7b - Asset Replacement Non NARM

Commentary (up to 10 pages combined with CV7)

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CV7c - Asset Replacement Civils Driven

Commentary (up to 10 pages combined with CV7)

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CV8 - Refurbishment Non NARM

Commentary (up to 7 pages)

--

CV9 - Refurbishment NARM

Commentary (up to 7 pages)

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CV10 - Civil Works Condition Driven

Commentary

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CV11 - Operational IT and Telecoms

Commentary (up to 5 pages)

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Guidance ED3 Business Plan Data Table Commentary

CV12 – Electricity System Restoration (ESR)

Commentary

CV13 - BT21CN

Commentary

CV14 - Legal and Safety

Commentary

CV15 - QoS and North of Scotland Resilience

Commentary

CV16a - Flood Mitigation

Commentary

Guidance ED3 Business Plan Data Table Commentary

CV16b - Storm Resilience

Commentary

CV16c - Extreme Heat

Commentary

CV16d - Storm Arwen PCD

Commentary

CV17 - Rising and Lateral Mains (RLMs)

Commentary

CV18 - Overhead Clearances

Commentary

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CV19 - Worst Served Customers (WSC)

Commentary

CV20 - Visual Amenity

Commentary

CV21 - Losses

Commentary

CV22 - Environmental Reporting

Commentary (up to 5 pages)

CV23 – High Value Projects DR5 & ED1 & ED2

Commentary

Guidance ED3 Business Plan Data Table Commentary

CV24 – High Value Projects ED3

Commentary

CV26 - Faults

Commentary (up to 7 pages)

CV28 - Occurrences Not Incentivised (ONIs)

Commentary

CV29 - Tree Cutting

Commentary

CV30 - Inspections

Commentary

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CV31 - Repairs and Maintenance

Commentary

CV32 - Dismantlement

Commentary

CV33 - Substation Electricity

Commentary

CV35 - Operational Training (CAI)

Commentary

CV36 – NIA

Commentary

Guidance ED3 Business Plan Data Table Commentary

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CV37– NIC & LCN fund

Commentary

CV39 – DRS

Commentary

CV40 – SIF

Commentary

CV42 – West Coast of Cumbria

Commentary

Guidance ED3 Business Plan Data Table Commentary

CV43 – Smart Street

Commentary

CV44 – Voltage Management

Commentary

Volume Table Commentary

V1– Total Asset Movements

Commentary

V2– Cleansing

Commentary

V4– Other Asset Movements

Commentary

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V5 – Volume Matrix (2016-2033)

Commentary

AP1– Age Profile

Commentary

RPEs and Ongoing Efficiency Table Commentary

OERPE1 – RPEs and OE

Commentary

Memo Table Commentary

M1 - Flood Mitigation (site)

Commentary

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Commentary

M4 – Vulnerability Deliverables

Commentary

M9 - Streetworks

Commentary

M13 - Uncertainty Mechanisms

Commentary

M14 - Drivers

Commentary

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M15 - MEAV

Commentary

M18 - FTE

Commentary

M19 – DSO

Commentary (up to 7 pages)

M20 - LCT

Commentary

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Commentary

M29 – Data and Digitalisation

Commentary

M30 – Climate Resilience

Commentary

M31 – Capex & Opex split

Commentary

M32 – Voltage Management

Commentary

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NARM1 – Risk Index Weightings

Commentary

NARM2 – ED2 NARM Profiles

Commentary

NARM3 – ED3 NARM Profiles

Commentary

NARM4 – ED3 NARM Risk Movements

Commentary

LI - Substations

Commentary

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LI – Substation Groups

Commentary

Fault Level Index

Commentary

Additional Commentary

2.2 DNOs should include additional supporting commentary on the BPDT where they consider it necessary to aid Ofgem’s understanding of the BPDT submission. Please insert any additional commentary below using headings and commentary boxes.

Additional commentary

Commentary

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Send us your feedback

We are keen to receive your feedback about this guidance. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this guidance?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Do you have any further comments?

Please send your feedback to stakeholders@ofgem.gov.uk.