

Consultation

Proposal to modify the Pensions Regulatory Instructions and Guidance Publication date: 22 May 2026

Publication date:	22 May 2026
Response deadline:	19 June 2026
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Notice proposing modifications to the Pensions Regulatory Instructions and Guidance

We are consulting on proposed modifications to the Regulatory Instructions and Guidance (“RIGs”) for Network Operators’ Price Control Pension Costs. The Pension RIGs provide the reporting requirements for each relevant licensee allowing Ofgem to carry out the 2026 triennial Pensions Reasonableness Review (“Pensions Reasonableness Review”) to ensure that the costs of defined benefit pension schemes that companies pass on to consumers are justified and efficient.

Purpose of this consultation

We propose to make modifications to RIGs - the Network Operators’ Price Control Pension Costs – Regulatory Instructions and Guidance (“the Pension RIGs”).

We have enclosed the Notices setting out our proposed changes issued pursuant to the relevant Licence Conditions for each sector.

As part of the enclosed Notices, we provide the following documents:

- Pension RIGs guidance – a marked-up version with proposed changes and a ‘clean’ version;
- Pension RIGs template; and
- 2026 Pensions Reasonableness Review - Licensee questionnaire.

Overview

We are proposing a number of minor updates and modifications to the Pensions RIGs template and guidance. These include:

- General updates to input data and parameters for the 2025/26 reporting year
- Removing sheets and related guidance no longer required
- Adding columns to the RIGs template to extend to years 2033-34

Consultation stages

Stage 1 Consultation open: 22 May 2026.

Stage 2 Consultation closes (awaiting decision). Deadline for responses: 19 June 2026.

Stage 3 Responses reviewed and decision published: 03 July 2026.

How to respond

We want to hear from anyone interested in this consultation. Please send your response to the person or team named on the front page of this document.

We will publish non-confidential responses on our website.

Your response, data, and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations, or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (“Regulation (EU) 2016/679”) as retained in domestic law following the United Kingdom's withdrawal from the European Union (“UK GDPR”), the Gas and Electricity Markets Authority will be the data controller for the purposes of the UK GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

How to track the progress of a consultation

1. Find the web page for the call for input you would like to receive updates on.
2. Click ‘Get emails about this page’, enter your email address and click ‘Submit’.
3. You will receive an email to notify you when it has changed status.

A consultation has three stages: ‘Open’, ‘Closed (awaiting decision)’, and ‘Closed (with decision)’.

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Send us your feedback

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this consultation. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Do you have any further comments?

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

Appendix 1. ET notice

To:

- National Grid Electricity Transmission plc (“NGET”) (Company Number: 02366977)
 - SP Transmission Limited (“SPTL”) (Company Number: SC189126)
 - Scottish Hydro Electric Transmission plc (“SHET”) (Company number: SC213461)
- (each one a “Licensee”, and together, “the Licensees”)

Notice under Part A of Standard Licence Condition B15 (Regulatory Instructions and Guidance) (“SLC B15”) of the Electricity Transmission Licence (the “Licence”) granted to the Licensees under section 6(1)(b) of the Electricity Act 1989 (the “Act”).

The Gas and Electricity Markets Authority (the “Authority”) ¹ hereby gives notice under Part A of SLC B15 as follows:

Proposal to modify the Regulatory Instructions and Guidance

- A1.1 The Authority proposes to modify the Regulatory Instructions and Guidance (the “RIGS”) in accordance with SLC B15 of the Licence.
- A1.2 The RIGs are the primary means by which the Authority directs the Licensees to collect and to provide information to the Authority, to enable it to administer the Special Conditions of the Licence and, where not referenced in the Licence, the RIIO-T2 Final Determinations². Part A of SLC B15 sets out the process for issuing and modifying the RIGs.
- A1.3 In accordance with SLC B15, the Authority hereby gives notice to the Licensees that it proposes to modify the RIGs in the manner indicated in the documents that can be accessed on its website, published alongside this Notice.
- A1.4 The proposed modifications to the RIGs consist of revisions to existing tables and guidance. These modifications are proposed to be made in order to clarify existing reporting requirements.
- A1.5 The proposed modifications refer specifically to information required to be submitted to the Authority in the following areas:

¹ The “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Office of Gas and Electricity Markets (Ofgem) supports the Authority in its day to day work.

² <https://www.ofgem.gov.uk/publications-and-updates/riio-2-final-determinations-transmission-and-gas-distribution-network-companies-and-electricity-system-operator>

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- The Pensions Regulatory Instruction and Guidance excel template and guidance document

A1.6 The proposed modifications are summarised below:

- General updates to input data and parameters for the 2025/26 reporting year
- Removing sheets and related guidance no longer required
- Adding columns to the RIGs template to extend to years 2033-34

A1.7 The Authority proposes that this new template and guidance take effect from 3 July 2026.

A1.8 Licensees must complete and submit the reporting pack referred to above as part of the 2025/26 RIGs process.

Further information

A1.9 The RIIO Pensions Regulatory Instruction and Guidance and Template version 4.1 published alongside this notice show the proposed modifications as incorporated.

A1.10 Copies of this Notice and other documents referred to in it are available on the Ofgem website (www.ofgem.gov.uk).

A1.11 Any representations on the proposed modifications must be made on or before 19 June 2026 to David Simpson by email to david.simpson@ofgem.gov.uk

A1.12 Our normal practice is to publish responses on our website. We prefer to receive responses in electronic format to facilitate publication. However, if you do not wish your response to be made public, you should clearly mark it as “not for publication.”

Mick Watson
Deputy Director
Financial Resilience and Controls
Duly authorised on behalf of the Authority
26 May 2026

Appendix 2. GT notice

To:

- National Gas Transmission plc (Company Number: 02006000 - with respect to its gas transmission network – “the Licensee”)

Notice under Part A of the Standard Special Condition A40 (Regulatory Instructions and Guidance) SSC A40 of the Gas Transporter Licence (the “Licence”) granted to the Licensee under section 7 of the Gas Act 1986 (the “Act”).

The Gas and Electricity Markets Authority (the “Authority”)³ hereby gives notice under Part A of SSC A40 as follows:

Proposal to modify the Regulatory Instructions and Guidance

- A2.1 The Authority proposes to modify the Regulatory Instructions and Guidance (the “RIGS”) in accordance with SSC A40 of the Licence.
- A2.2 The RIGs are the primary means by which the Authority directs the Licensees to collect and to provide information to the Authority, to enable it to administer the Special Conditions of the Licence and, where not referenced in the Licence, the RIIO-GT2 Final Determinations⁴. Part A of SSC A40 sets out the process for issuing and modifying the RIGs.
- A2.3 In accordance with SSC A40, the Authority hereby gives notice to the Licensees that it proposes to modify the RIGs in the manner indicated in the documents that can be accessed on its website, published alongside this Notice.
- A2.4 The proposed modifications to the RIGs consist of revisions to existing tables and guidance. These modifications are proposed to be made in order to clarify existing reporting requirements.
- A2.5 The proposed modifications refer specifically to information required to be submitted to the Authority in the following areas:
- The Pensions Regulatory Instruction and Guidance excel template and guidance document
- A2.6 The proposed modifications are summarised below:

³ The “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Office of Gas and Electricity Markets (Ofgem) supports the Authority in its day to day work.

⁴ <https://www.ofgem.gov.uk/publications-and-updates/riio-2-final-determinations-transmission-and-gas-distribution-network-companies-and-electricity-system-operator>

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- General updates to input data and parameters for the 2025/26 reporting year
- Removing sheets and related guidance no longer required
- Adding columns to the RIGs template to extend to years 2033-34

A2.7 The Authority proposes that this new template and guidance take effect from 3 July 2026.

A2.8 Licensees must complete and submit the reporting pack referred to above as part of the 2025/26 RIGs process.

Further information

A2.9 The RIIO Pensions Regulatory Instruction and Guidance and Template version 4.1 published alongside this Notice show the proposed modifications as incorporated.

A2.10 Copies of this Notice and other documents referred to in it are available on the Ofgem website (www.ofgem.gov.uk).

A2.11 Any representations on the proposed modifications must be made on or before 19 June 2026 to David Simpson by email to david.simpson@ofgem.gov.uk

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Mick Watson
Deputy Director
Financial Resilience and Controls
Duly authorised on behalf of the Authority
26 May 2026

Appendix 3. GD notice

To:

- Cadent Gas Limited (Company Number: 10080864)
- Northern Gas Networks Limited (Company Number: 05167070)
- Scotland Gas Networks plc (Company Number: SC264065)
- Southern Gas Networks plc (Company Number: 05167021)
- Wales & West Utilities Limited (Company Number: 05046791)
(each one a “Licensee”, and together, “the Licensees”)

Notice under Part A of the Standard Special Condition A40 (Regulatory Instructions and Guidance) SSC A40 of the Gas Transporter Licence (the “Licence”) granted to the Licensee under section 7 of the Gas Act 1986 (the “Act”).

The Gas and Electricity Markets Authority (the “Authority”)⁵ hereby gives notice under Part A of SSC A40 as follows:

Proposal to modify the Regulatory Instructions and Guidance

- A3.1 The Authority proposes to modify the Regulatory Instructions and Guidance (the “RIGS”) in accordance with SSC A40 of the Licence.
- A3.2 The RIGs are the primary means by which the Authority directs the Licensees to collect and to provide information to the Authority, to enable it to administer the Special Conditions of the Licence and, where not referenced in the Licence, the RIIO-GD2 Final Determinations⁶. Part A of SSC A40 sets out the process for issuing and modifying the RIGs.
- A3.3 In accordance with SSC A40, the Authority hereby gives notice to the Licensees that it proposes to modify the RIGs in the manner indicated in the documents that can be accessed on its website, published alongside this Notice.
- A3.4 The proposed modifications to the RIGs consist of revisions to existing tables and guidance. These modifications are proposed in order to clarify existing reporting requirements.
- A3.5 The proposed modifications refer specifically to information required to be submitted to the Authority in the following areas:
- The Pensions Regulatory Instruction and Guidance excel template and guidance document

⁵ The “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Office of Gas and Electricity Markets (Ofgem) supports the Authority in its day to day work.

⁶ <https://www.ofgem.gov.uk/publications-and-updates/riio-2-final-determinations-transmission-and-gas-distribution-network-companies-and-electricity-system-operator>

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A3.6 The proposed modifications are summarised below:

- General updates to input data and parameters for the 2025/26 reporting year
- Removing sheets and related guidance no longer required
- Adding columns to the RIGs template to extend to years 2033-34

A3.7 The Authority proposes that this new template and guidance take effect from 3 July 2026.

A3.8 Licensees must complete and submit the reporting pack referred to above as part of the 2025/26 RIGs process.

Further information

A3.9 The RIIO Pensions Regulatory Instruction and Guidance and Template version 4.1 published alongside this Notice show the proposed modifications as incorporated.

A3.10 Copies of this Notice and other documents referred to in it are available on the Ofgem website (www.ofgem.gov.uk).

A3.11 Any representations on the proposed modifications must be made on or before 19 June 2026 to David Simpson by email to david.simpson@ofgem.gov.uk

A3.12 Our normal practice is to publish responses on our website. We prefer to receive responses in electronic format to facilitate publication. However, if you do not wish your response to be made public, you should clearly mark it as “not for publication.”

Mick Watson
Deputy Director
Financial Resilience and Controls
Duly authorised on behalf of the Authority
26 May 2026

Appendix 4. ED notice

To:

- SP Electricity North West Ltd (Company Number: 02366949)
- Northern Powergrid (Northeast) Ltd (Company Number: 02906593)
- Northern Powergrid (Yorkshire) plc (Company Number: 04112320)
- London Power Networks plc (Company Number: 03929195)
- South Eastern Power Networks plc (Company Number: 03043097)
- Eastern Power Networks plc (Company Number: 02366906)
- SP Distribution plc (Company Number: SC189125)
- SP Manweb plc (Company Number: 02366937)
- Scottish Hydro Electric Power Distribution plc (Company Number: SC213460)
- Southern Electric Power Distribution plc (Company Number: 04094290)
- National Grid Electricity Distribution (West Midlands) plc (Company Number: 03600574)
- National Grid Electricity Distribution (East Midlands) plc (Company Number: 02366923)
- National Grid Electricity Distribution (South Wales) plc (Company Number: 02366985)
- National Grid Electricity Distribution (South West) plc (Company Number: 02366894) (each one a “Licensee”, and together, “the Licensees”)

Notice under Part C of the Standard Licence Condition 46 (Regulatory Instructions and Guidance) (“SLC46”) of the Electricity Distribution Licence (the “Licence”) granted to the Licensees under section 6(1)(b) of the Electricity Act 1989 (the “Act”).

The Gas and Electricity Markets Authority (the “Authority”)⁷ hereby gives notice under Part C of SLC 46 as follows:

Proposal to modify the Regulatory Instructions and Guidance

- A4.1 The Authority proposes to modify the Regulatory Instructions and Guidance (the “RIGS”) in accordance with SLC 46 of the Licence.
- A4.2 The RIGs are the primary means by which the Authority directs the Licensees to collect and to provide information to the Authority, to enable it to administer the Special Conditions of the Licence and, where not referenced in the Licence, the RIIO-ED2 Final Determinations⁸. Part C of SLC 46 sets out the process for issuing and modifying the RIGs.
- A4.3 In accordance with SLC 46, the Authority hereby gives notice to the Licensees that it proposes to modify the RIGs in the manner indicated in the documents that can be accessed on its website, published alongside this Notice.

⁷ The “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Office of Gas and Electricity Markets (Ofgem) supports the Authority in its day to day work.

⁸ <https://www.ofgem.gov.uk/decision/riio-ed2-final-determinations>

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A4.4 The proposed modifications to the RIGs consist of revisions to existing tables and guidance. These modifications are proposed in order to clarify existing reporting requirements.

A4.5 The proposed modifications refer specifically to information required to be submitted to the Authority in the following areas:

- The Pensions Regulatory Instruction and Guidance excel template and guidance document

A4.6 The proposed modifications are summarised below:

- General updates to input data and parameters for the 2025/26 reporting year
- Removing sheets and related guidance no longer required
- Adding columns to the RIGs template to extend to years 2033-34

A4.7 The Authority proposes that this new template and guidance take effect from 3 July 2026.

A4.8 Licensees must complete and submit the reporting pack referred to above as part of the 2025/26 RIGs process.

Further information

A4.9 The RIIO Pensions Regulatory Instruction and Guidance and Template version 4.1 published alongside this Notice show the proposed modifications as incorporated.

A4.10 Copies of this Notice and other documents referred to in it are available on the Ofgem website (www.ofgem.gov.uk).

A4.11 Any representations on the proposed modifications must be made on or before 19 June 2026 to David Simpson by email to david.simpson@ofgem.gov.uk

A4.12 Our normal practice is to publish responses on our website. We prefer to receive responses in electronic format to facilitate publication. However, if you do not wish your response to be made public, you should clearly mark it as “not for publication.”

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Deputy Director
Financial Resilience and Controls
Duly authorised on behalf of the Authority
26 May 2026

Appendix 5. Privacy policy

Personal data

The following section explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (“GDPR”).

Note that this section only refers to your personal data (your name, address, and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As Ofgem is a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

Information: Include here all organisations outside Ofgem which will be given all or some of the data. There is no need to include organisations that will only receive anonymised data. If different organisations see different set of data then make this clear. Be as specific as possible.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for (be as clear as possible but allow room for changes to programmes or policy. It is acceptable to give a relative time e.g. ‘six months after the project is closed’)

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data

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- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (“ICO”) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system.

10. More information For more information on how Ofgem processes your data, click on the link to our “[ofgem privacy promise](#)”.