## **DNO Group Name**

## Regulatory Instructions and Guidance Commentary – Costs and Volumes

Reporting Year 2011-12

#### **Contents**

The main chapter numbers relate to the tables names in the RIGs templates to which the text relates

- C1 Cost Matrix
- C2 Checks sheet
- C3 Year on Year Movements
- C4 RAV Additions
- C5 Tax Pools and Data Segmental Reporting
- C6 Contractor Adjustment Memo
- C7 Related Party Analysis
- C8 Related Party Cross Subsidy Analysis
- C9 Summary Related Party Disallowed Margins
- C10 Summary Network Investment by Category
- C11 Summary Core by Cost Type
- C12 Reinforcement and DSM payments
- C13 Summary Asset Replacement, Refurbishment and Civil Works
- C14 Operational IT & Telecoms
- C15 Quality of Service
- C16 Summary Non Core ex-ante by Cost Type
- C17 Summary Non Core Reopener by Cost Type
- C18 High Impact Low Probability (HILP)
- C19 Critical National Infrastructure (CNI)
- C20 Stand Alone Funding Not RAV by Cost Type
- C21 IFI
- C22 LCN First Tier
- C23 LCN Second Tier
- C24 Network Operating Costs by Cost Type
- C25 Atypicals Severe Weather
- C26 Network Operating Costs Other
- C27 Non Price Control Costs by Cost Type
- C28 Excluded Services
- C29 Legacy Metering
- C30 Out of Area Networks
- C31 De Minimis
- C32 Other (consented) Activities
- C33 Atypicals Excluding severe weather

- C34 Non Activity Based Costs
- C35 Non-Op Capex Reallocation by Cost Type
- C36 Indirects
- C37 Finance and Regulation
- CV1 Diversions
- CV2 ESQCR
- CV3 Asset Replacement
- CV4 Asset Replacement memo
- CV5 Refurbishment
- CV6 Civils Work
- CV7 Undergrounding in Designated Areas
- CV8 Legal & Safety
- CV9 High Value Projects
- CV10 BT 21st Century
- CV11 Flood Mitigation
- CV12 Environmental Investment
- CV13 Inspections & Maintenance
- CV14 Tree Cutting
- CV15 MTP all incidents (inc Trouble Call)
- CV16 Worst Served Customers
- CV17 Connection Summary
- CV18 Black Start
  - V1 Total Asset Movement
  - V2 Asset Register Demand Connections
  - V3 Asset Register General Reinforcement
  - V4 Asset Register Other Movements
  - V5 Asset Register Age Profile
  - V6 Fault Levels
  - V7 Flood Mitigation
  - V8 Streetworks
  - V9 MTPs one-off EEs only
- V10 MTPs Severe Weather EEs
- V10a MTP Severe Weather Atypicals 1 in 20
- V11 MTPs excluding all EEs
- V12 Business Carbon Footprint
- V13 Transmission Connection Points
- V14 Registered Power Zones

V15 - Losses

V16 – Losses DG Adjustment (Lag)

V17 - Losses DG Adjustment (DGV)

V18 – Quality of Service placeholder

#### **Objectives and Information required**

#### **Objectives**

The commentary provides the opportunity for DNOs to explain why costs have been incurred, the annual movements, and the reasons for variations from assumptions made at the time of the Price Control Review (DPCR5). It will be used in conjunction with the RIGs tables, to understand the structures and operations of each DNO, to inform the next price control and to monitor DNOs' performance against Ofgem's assumptions for costs and volumes included in the DPCR5 final proposals document.

We also want to provide DNOs with an opportunity to set out how their activities and expenditure sit when looked at through a RIIO lens. As such there is a commentary section on RIIO outputs within this document.

A full and frank commentary should reduce the number of questions and time spent by both Ofgem and DNO staff on review visits.

#### General

To avoid duplication one Commentary document is required per DNO Group. Respondents should ensure that comments are clearly marked to show which DNO the commentary relates or if it is applicable to all the DNOs within the group.

The Commentary for the 2010-11 reporting year will focus on a "finalising the RIGs" process and will include a number of key areas which will be required for every table, unless otherwise stated. If any additional information is required for individual tables it will be stated. If the respondent wishes to include further comments to assist our understanding of the data or methodologies provided in the data tables, this is welcomed.

DNOs should include supporting documentation where they consider it necessary to support their comments or where it may aid Ofgem's understanding. Please insert an appropriate chapter heading and commentary box in the body of this document where it is necessary to provide additional commentary.

Commentary on RIIO outputs:

**Environment:** Describe what you have done in the year both to play your role in the achievement of broader environmental objectives, namely the reduction in carbon emissions, as well as minimising the "narrow" environmental impact of the your activities by managing your own carbon footprint.

Type commentary here

**Customer satisfaction:** Describe what you have done in the year both to maintain high levels of customer satisfaction and, where necessary, to improve service levels. Describe the stakeholder engagement you have engaged in and

how you have used this in your day to day operations.

Type commentary here

**Connections:** Describe what you have done in the year to ensure that connections customers are connected in a timely and efficient way and how you have gone about responding to any specific needs of distributed generators.

Type commentary here

**Social objectives:** Describe what you have done in the year to deliver any applicable social obligations mandated by government and any work you've undertaken with other parts of the energy industry to meet the needs of the fuel poor.

Type commentary here

**Safety:** Describe what you have done in the year both to ensure the provision of a safe network in compliance with Health and Safety Executive safety standards.

Type commentary here

**Reliability and availability:** Describe what you have done in the year both to promote a network capable of giving long term reliability as well as minimising the number and duration of interruptions experienced over the price control period, and also to ensure adaptation to climate change.

Type commentary here

Commentary to cover the entire pack:

Detail the compliance assurance steps that you have followed to assure yourself of the accuracy and validity of the information contained in your submission. It may be helpful for you to identify the assurance techniques/steps, provide commentary as to how you applied these and also to list the table(s) to which these techniques were applied.

Specifically, the commentary should cover:

- A description of the individual reporting areas that were subject to review during the reporting year (for example, the areas where an internal or external review has been carried out)
- A description of the nature of any such reviews. For example, identifying the party carring out the review, the scope of the activity and the type of activity involved
- The process through which the areas for review were identified and

#### selected

- The process through which the scope of the review was defined and the specific audit techniques selected.
- The outcome(s) of any review(s)

Key areas of learning for future years should also be identified – i.e. highlighting improvements licensee is looking to introduce as a result of this year's work.

Type commentary here

Detail the plans for the introduction of any new systems which have or will be used for the completion of the workbook/worksheets; including the names and dates of implementation, and what these will be able to populate on the sheet that could not be done previously. A description of what the planned/new systems will not be able to populate, and what will still rely on management assumption/allocation methods.

Type commentary here

Detail where; tables have insufficient or inconsistant guidance, definitions are not identified within the glossary

Type commentary here

 Provide details of any formula changes undertaken, other than those directed by Ofgem, which were required to complete the worksheet. A failure to document all changes will be considered a failure to complete the submission in accordance with the rules and so a failure to comply. Does the individual worksheet function properly? Is everything linked correctly in order form the complete picture as intended?

#### Formula errors

Type commentary here

Table specific commentary where applicable should include:

- Detailed Explanations of the allocation methodologies which were employed to complete the table,
- A description of what systems are in place to complete the worksheet. This should include: The names of the systems from which the data was completed, if particular cells are completed from a specific IT system (e.g.

fault system where the workmen enter time/materials used etc) state that system and which cells it populates, along with any allocation methods used. The description should also include what proportion has been completed using primary records v. allocation methods

 Comments on the usefulness of each worksheet; including opinions on whether it could be shortened/expanded/combined with another worksheet/possibly deleted/kept the same - in order to form a more robust data set?

# General commentary regarding the Costs portion of the workbooks

Type commentary here

#### C1: Cost Matrix

Systems used to populate worksheet

Type commentary here

Small claim/ Atypicals Non Sev Weather non Distribution provisions detailed on a cash basis within the cost reporting workbooks

Type commentary here

Additional commentary/documentation

Type commentary here

#### C2: Checks Sheet

Additional commentary/documentation
Type commentary here

## **C3: Year on Year Comparisons**

Allocation methodologies	
Type commentary here	

Systems used to populate worksheet
Type commentary here

Additional commenta	ary/documentation
Type commentary he	ere

#### **C4: RAV Additions**

Commentary/documentation	
Type commentary here	

# **C5: Tax Pools and Data Segmental Reporting**

Commentary/documentation	
Type commentary here	

## **C6: Contractor Adjustment Memo**

Allocation methodologies
Type commentary here

Systems used to populate worksheet
Type commentary here

Additional commentary/documentation
Type commentary here

## **C7: Related Party Analysis**

Allocation methodologies	
Type commentary here	
Systems used to populate worksheet	
Type commentary here	

#### Additional commentary/documentation

Type commentary here

#### **C8: Related Party Cross Subsidy Analysis**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## **C9: Summary - Related Party Disallowed Margins**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## **C10: Network Investment by Category**

Additional commentary/documentation

Type commentary here

## **C11: Summary – Core by Cost Type**

Additional commentary/documentation	
Type commentary here	
C12: Reinforcement and DSM payments	
Allocation methodologies	
Type commentary here	
Systems used to populate worksheet	
Type commentary here	
Additional commentary/documentation	
Type commentary here	
C13: Summary – Asset Replacement, Refurbis	shment
and Civils Work	
Additional commentary/documentation	
Type commentary here	
C14: Operational IT&T	
Allocation methodologies	
Type commentary here	
Systems used to populate worksheet	
Type commentary here	
Additional commentary/documentation	
Type commentary here	
C15: Quality of Service	
Allocation methodologies	

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here Additional commentary/documentation Type commentary here C16: Summary – Non Core ex-Ante by Cost Type Additional commentary/documentation Type commentary here C17: Summary – Non Core reopener by Cost Type Additional commentary/documentation Type commentary here C18: High Impact Low Probability (HILP) Allocation methodologies Type commentary here Systems used to populate worksheet Type commentary here Additional commentary/documentation Type commentary here **C19: Critical National Infrastructure (CNI)** Allocation methodologies Type commentary here Systems used to populate worksheet Type commentary here Additional commentary/documentation Type commentary here

## C20: Stand Alone Funding - Not RAV - by Cost Type

Additional commentary/documentation	
Type commentary here	
C21: IFI	
Allocation methodologies	
Type commentary here	
Type commencary nere	
Systems used to populate worksheet	
Type commentary here	
Type commencary more	
Additional commentary/documentation	
Type commentary here	
C22: I CN First Tier	
C22: LCN First Tier	
Allocation methodologies	
Allocation methodologies	
Allocation methodologies  Type commentary here	
Allocation methodologies  Type commentary here  Systems used to populate worksheet	
Allocation methodologies  Type commentary here	
Allocation methodologies  Type commentary here  Systems used to populate worksheet	
Allocation methodologies  Type commentary here  Systems used to populate worksheet  Type commentary here	
Allocation methodologies  Type commentary here  Systems used to populate worksheet  Type commentary here  Additional commentary/documentation	
Allocation methodologies  Type commentary here  Systems used to populate worksheet  Type commentary here	
Allocation methodologies  Type commentary here  Systems used to populate worksheet  Type commentary here  Additional commentary/documentation	
Allocation methodologies  Type commentary here  Systems used to populate worksheet  Type commentary here  Additional commentary/documentation	
Allocation methodologies  Type commentary here  Systems used to populate worksheet  Type commentary here  Additional commentary/documentation  Type commentary here	
Allocation methodologies  Type commentary here  Systems used to populate worksheet  Type commentary here  Additional commentary/documentation	
Allocation methodologies Type commentary here  Systems used to populate worksheet Type commentary here  Additional commentary/documentation Type commentary here  C23: LCN Second Tier	
Allocation methodologies Type commentary here  Systems used to populate worksheet Type commentary here  Additional commentary/documentation Type commentary here  C23: LCN Second Tier  Allocation methodologies	
Allocation methodologies Type commentary here  Systems used to populate worksheet Type commentary here  Additional commentary/documentation Type commentary here  C23: LCN Second Tier	

# Systems used to populate worksheet

Type commentary here

#### Additional commentary/documentation

#### **C24: Network Operating Costs by Cost Type**

Additional commentary/documentation

Type commentary here

#### **C25: Atypicals – Severe Weather**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

#### **C26: Network Operating Costs - Other**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## **C27: Non Price Control Costs by Cost Type**

Additional commentary/documentation

Type commentary here

#### **C28: Excluded Services**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here Additional commentary/documentation Type commentary here **C29: Legacy Metering** Allocation methodologies Type commentary here Systems used to populate worksheet Type commentary here Additional commentary/documentation Type commentary here C30: Out of Area Networks Allocation methodologies Type commentary here Systems used to populate worksheet Type commentary here Additional commentary/documentation Type commentary here C31: De Minimis Allocation methodologies Type commentary here Systems used to populate worksheet Type commentary here Additional commentary/documentation Type commentary here

#### C32: Other (consented) activities

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

#### **C33: Atypicals – Excluded Severe Weather**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## **C34: Non Activity Based Costs**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## **C35: Non-Op Capex reallocation by Cost Type**

Allocation methodologies

Systems used to populate worksheet
Type commentary here
Additional commentary/documentation
Type commentary here
C36: Indirects
Additional commentary/documentation
Type commentary here
C2. Finance and Begulation
C3: Finance and Regulation
Allocation methodologies
Type commentary here
Systems used to populate worksheet
Type commentary here
Additional commentary/documentation
Type commentary here
General commentary regarding the Costs and
Volumes portion of the workbook
Type commentary here
Type commentary here
Type commentary here
Type commentary here  CV1: Diversions
CV1: Diversions
CV1: Diversions  Allocation methodologies
CV1: Diversions
CV1: Diversions  Allocation methodologies  Type commentary here
CV1: Diversions  Allocation methodologies

Type commentary here

Additional commentary/documentation

#### **CV2: ESQCR**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

#### **CV3: Asset Replacement**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

Where the costs of Strategic Spares have been included in CV3, please provide a description of all relevant assets and identify associated costs.

Type commentary here

## **CV4: Asset Replacement Memo**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

#### **CV5: Refurbishment**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

#### CV6: Civils

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## **CV7: Undergrounding in Designated Areas**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## CV8: Legal & Safety

Allocation methodologies

Systems used to populate worksheet
Type commentary here
//
Additional commentary/documentation
Type commentary here
CV9: High Value Projects
Allocation methodologies
Type commentary here
Contains and to requisite weather at
Systems used to populate worksheet
Type commentary here
Additional commentary/documentation
Type commentary here
Type commencery here
CV10: BT 21 <sup>st</sup> Century
Allocation methodologies
Type commentary here
Systems used to populate worksheet
Type commentary here
Additional commentary/documentation
Type commentary here

# **CV11: Flood Mitigation**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

#### **CV12: Environmental Investment**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

#### **CV13: Inspections and Maintenance**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## **CV14: Tree Cutting**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## CV15: MTP all incidents (inc. Trouble Call)

Allocation methodologies

Type commentary here Systems used to populate worksheet Type commentary here Additional commentary/documentation Type commentary here **CV16: Worst Served Customers (Place holder)** Commentary/documentation Type commentary here **CV17: Connection Summary** Allocation methodologies Type commentary here Systems used to populate worksheet Type commentary here Additional commentary/documentation Type commentary here **CV18: Black Start** Allocation methodologies Type commentary here Systems used to populate worksheet Type commentary here Additional commentary/documentation Type commentary here

# General commentary regarding the Volumes portion of the workbooks

Type commentary here

#### **V1: Total Asset Movement**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

#### **V2: Asset Register – Demand Connections**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## V3: Asset Register - General Reinforcement

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

## **V4: Asset Register – Other Movements**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

#### **V5: Asset Register - Age Profile**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

#### **V6: Fault Levels**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## V7: Flood Mitigations (site)

Allocation methodologies

Systems used to populate worksheet
Type commentary here
Additional commentary/documentation
Type commentary here
Type commencary here
V8: Streetworks
V9: MTPs one-off EEs only
Allocation methodologies
Type commentary here
Systems used to populate worksheet
Type commentary here
Additional commentary/documentation
Type commentary here
//
\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
V10: MTPs severe weather EEs only
Allocation methodologies
Type commentary here
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
Systems used to populate worksheet
Type commentary here
Additional commentary/documentation
Type commentary here
V10a, MTD Sovere Weather Atypicals 1 in 20
V10a: MTP Severe Weather Atypicals 1 in 20
Allocation methodologies
Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

#### V11: MTPs excluding all EEs

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

#### **V12: Business Carbon Footprint**

#### **General**

DNOs that are part of a larger corporate group must provide a brief introduction outlining the structure of the group, detailing which organisations are considered within the reporting boundary for the purpose of BCF reporting.

Please detail any assumptions that have been used when calculating figures for any of the BCF reporting categories.

The basis for calculating any apportionment factors across Distribution Service Areas must also be set out.

Please also detail any auditing performed to verify emissions data throughout the commentary.

Type commentary here

#### **Building energy usage**

The methodology used to calculate building energy usage should be detailed here. All substation consumption must be calculated as energy supplied and the methodology for how this has been assessed must be detailed here.

Type commentary here

#### **Operational Transport**

The methodology used to calculate the operational transport usage should be detailed here. Any assumptions that have been used where specific information is not available should also be detailed.

#### **Business Transport**

The methodology used to calculate the business transport usage should be detailed here.

Type commentary here

#### **Fugitive Emissions**

The methodology used to calculate fugitive emissions should be detailed here. Any fugitive emissions that have not been calculated, or have been estimated should be identified.

Type commentary here

#### **Fuel combustion**

The methodology used to calculate fuel combustion should be detailed here. Any sources of emissions that have not been included should be identified as well as the degree of estimation.

Type commentary here

#### Losses

Please detail any information relevant to BCF losses reporting here, including an indication of which methodology was used to calculate losses.

Type commentary here

#### **Contractors**

The exclusion of any contractors must be justified in this section, as well as detailing the proportion of contractors that have been excluded.

Type commentary here

#### **Data Tables**

Please include data tables for each area of emissions containing the data detailed in the RIGs.

## **V13: Transmission Connection Points (TCP)**

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## V14: Registered Power Zones (RPZ)

# Allocation methodologies Type commentary here Systems used to populate worksheet Type commentary here

Additional commentary/documentation

Type commentary here

#### V15: Losses

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

## V16: Losses DG Adjustment (Lag)

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Type commentary here

Additional commentary/documentation

Type commentary here

# V17: Losses DG Adjustment (DGV)

Allocation methodologies

Type commentary here

Systems used to populate worksheet

Additional commentary/documentation

Type commentary here

# V18: QoS (Place holder)

Commentary/documentation