

Respondent details		Martin Hill, SP Energy Networks – Tel 0141 614 1768, Martin.hill@scottishpower.com			
No.	Electricity or Gas and NIC or NIA	Chapter Name	Page/Paragraph Ref	Comments	Suggested alternative drafting
1	Elec NIC	Project Changes	Pg 23, 4.36	The requirement that IPR arrangements cannot be changed after the ISP submission unless it is to revert back to the default arrangements may be challenging. After passing the ISP stage, it is highly foreseeable that further project partners may join, or following the procurement stage for a supplier, alternative IPR arrangements may be required. The current wording is absolute in that no further changes to IPR arrangements are allowed.	A caveat could be added that changes are not allowed without approval from Ofgem ahead of the full submission.
2	Elec NIC	Full Submission Pro-forma and appendices	Pg 24, 5.10	IT is not clear if the 100 page limit includes the spreadsheets. In previous LCNF submissions it has been assumed not but any clarity would be appreciated as these can be c.10 pages in length	Clarity that 100 page limit does not include spreadsheets
3	Elec NIC	Funding request	Pg 28, 5.21	Under the Direct Benefits section of this paragraph (first bullet), we would challenge the need to supply any direct benefits into a separate bank account as the direct benefit may not yet have accrued. This could either be as a result of the incentive mechanism by which the Licensee anticipates a direct benefit not creating such a direct benefit until a later time, or any revenue which is offset not yet being allowed until a later time in the price review.	We would suggest the requirement for any Direct Benefit to be transferred to the bank account to be removed.
4	Elec NIC	Customer Protection	pg45, 8.10-8.12	As per our covering letter, we have reservations over the level of detail which is required for customer engagement and perceive this as being a blocker to energy efficiency being demonstrated with domestic customers. We agree that 8.13 & 8.14 should remain.	We would like these paragraphs to be revised to reflect a more general obligation such as: "Network licensees should demonstrate best practice in engaging with customers in relation to this project."
5	Elec NIA	NIA Governance Document	Pg7, 1.16	The definition of method is directly related to technology innovation and no acknowledgement is made of commercial innovation.	A further sub bullet under 'method' could be added to include novel application of a commercial arrangement of operational practice that has not been previously demonstrated in GB.'
5	Elec NIA	Project portfolio	Pg12, 3.4	The requirement for all IFI projects to be transferred to NIA arrangements may not be possible, particularly in relation to projects which have different IPR arrangements. This is particularly true as TOs have very little time to now change any IPR agreements prior to commencing the T1 period.	We would ask that a one year period is granted for all aspects of legacy IFI projects to be fully aligned with NIA requirements.

6	Elec NIA	Specific requirements	Pg14, 3.12 ii) & iii)	Para 3.12 provides the option of what the PEA should set out rather than all criterion being a requirement	The last word in sub-bullet ii) and iii) should read 'or' instead of 'and'.
7	Elec NIA	Documentation Requirements	Pg15 3.17	The requirement to	

Response template for NIC and NIA informal governance consultation