

Respondent details		Roger Hey – Western Power Distribution			
No.	Electricity or Gas and NIC or NIA	Chapter Name	Page/Paragraph Ref	Comments	Suggested alternative drafting
1	NIA	Introduction	P5/1.1	Typo - "Overtime"	"Over time"
2	NIA	Introduction	P6/1.4	The section references two purposes for LCNF funding: "1.4. The NIA provides limited funding to Licensees to use for two purposes: • to fund smaller Projects which meet the criteria set out in this Governance Document; and/or • to fund the preparation of submissions to the NIC which meet the criteria set out in the NIC Governance Document3"	For clarity it may be better to specifically mention other allowable costs such as the cost of running the annual conference, web portals and other essential governance activities. (para 6.9 on p 26 partially supports this) "1.4. The NIA provides limited funding to Licensees to use for two purposes: • to fund smaller Projects which meet the criteria set out in this Governance Document; and/or • to fund the preparation of submissions to the NIC which meet the criteria set out in the NIC Governance Document3 • to fund other essential set-up and operational costs associated with NIA and NIC activities."
3	NIA	Introduction	P7/1.11	Typo - 1.11. "The regulation, governance and administration for the NIA is set out in the NIA Governance Document."	"The regulation, governance and administration for the NIC is set out in the NIC Governance Document."
4	NIA	Introduction	P7/Footnote 5	Typo – "s Technology readiness levels (TRLs) are used to assess the maturity of evolving technologies, graded on a scale of 1-9. Projects with a TRL between 1 and 9) will not be eligible for NIA funding"	"s Technology readiness levels (TRLs) are used to assess the maturity of evolving technologies, graded on a scale of 1-9. Projects with a TRL of 1 and 9) will not be eligible for NIA funding"
5	NIA	Introduction	P7/1.16	As drafted the document may preclude projects with Methods with elements across more than one TRL level. " Method: means the proposed way of investigating or solving the Problem. This may be done by either5: ○ Research (TRL 2-3) which means activity undertaken to investigate the problem based on observable facts; ○ Development (TRL 4-6) which means activity on generating and testing solutions to the Problem; and ○ Demonstration (TRL 7-8) which means activity focussed on generating and testing solutions on the network and take it to a stage where they can be transferred to business as usual. "	" Method: means the proposed way of investigating or solving the Problem. This may be done by one or more of the following 5: ○ Research (TRL 2-3) which means activity undertaken to investigate the problem based on observable facts; ○ Development (TRL 4-6) which means activity on generating and testing solutions to the Problem; and ○ Demonstration (TRL 7-8) which means activity focussed on generating and testing solutions on the network and take it to a stage where they can be transferred to business as usual. "

6	NIA	Introduction	P8/1.14	Section number not correct.	Should be section 1.17 with knock on impact on all remaining sections
7	NIA	Collaboration and Project partner awareness	p11/2.12	Typo "2.12. The requirements of this chapter could be fulfilled by creating a single website or multiples websites."	"2.12. The requirements of this chapter could be fulfilled by creating a single website or multiple websites."
8	NIA	Network Innovation Allowance Projects	P14/3.12(ii)	Typo "ii) the financial benefits of a Development or Demonstration as set out in paragraph 3.18 to 3.22 below; and"	"ii) the financial benefits of a Development or Demonstration project as set out in paragraph 3.18 to 3.22 below; and"
9	NIA	Network Innovation Allowance Projects	P15/3.16	Requirement to publish a PEA as a standalone document could lead to duplication with other documents (eg. Registration pro-forma and Project Initiation Document"). "Before Registration of a NIA Project, the Funding Licensee(s) must produce a PEA, demonstrating that the Project meets the Specific Requirements set out in paragraphs 3.6 to 3.16 above and why the Funding Licensee is not implementing the Project as part of its normal business activity. This assessment should be published on the Project Registration Page."	"Before Registration of a NIA Project, the Funding Licensee(s) must carry out a PEA, demonstrating that the Project meets the Specific Requirements set out in paragraphs 3.6 to 3.16 above and why the Funding Licensee is not implementing the Project as part of its normal business activity. This assessment should be published on the Project Registration Page of the NIA portal. "
10	NIA	Eligible Expenditure	P19/3.22	See comment ref: 2 above	As per comment 2
11	NIA	Definitions	P29	Typo - "Initial Screening Process (ISP) All proposed Gas NIC Projects must....."	"Initial Screening Process (ISP) All proposed Electricity NIC Projects must....."
12	NIC	Introduction	P5/1.1	Typo - "Overtime"	" Over time "
13	NIC	Introduction	P5/1.3	Typo - "included"	" includes "
14	NIC	Introduction	P6/1.8	Clarification needed on the combination of NIC and LCNF funding sources: "Network Licensees may also collaborate with DNOs, Gas Transporters and IDNOs on Electricity NIC projects as Project Partners. Project Partners are able to contribute External Funding to a Project but only Network Licensees are eligible to lead bids for NIC funding."	"Network Licensees may also collaborate with DNOs, Gas Transporters and IDNOs on Electricity NIC projects as Project Partners. Project Partners are able to contribute External Funding to a Project (in the case of DNOs this could be funds under the LCNF and IFI schemes) but only Network Licensees are eligible to lead bids for NIC funding."

15	NIC	Introduction	P8/1.20	As drafted the document may preclude projects with Methods with elements across more than one TRL level. "Method: means the proposed way of investigating or solving the Problem. This may be done by either5: <ul style="list-style-type: none"> o Development (TRL 4-6) which means activity on generating and testing solutions to the Problem; and o Demonstration (TRL 7-8) which means activity focussed on generating and testing solutions on the network and take it to a stage where they can be transferred to business as usual. " 	"Method: means the proposed way of investigating or solving the Problem. This may be done by one or both of the following 5: <ul style="list-style-type: none"> o Development (TRL 4-6) which means activity on generating and testing solutions to the Problem; and o Demonstration (TRL 7-8) which means activity focussed on generating and testing solutions on the network and take it to a stage where they can be transferred to business as usual. "
16	NIC	Collaboration and Project partner awareness	p11/2.12	Typo "2.12. The requirements of this chapter could be fulfilled by creating a single website or multiples websites."	"2.12. The requirements of this chapter could be fulfilled by creating a single website or multiple websites."
17	NIC	Initial Screening Process	P16/4.8	Remove reference to Research: "4.8. A NIC Project must have the potential to have a Direct Impact on a Network Licensee's network and involve the research and development, trialling or demonstration of at least one of the following:"	"4.8. A NIC Project must have the potential to have a Direct Impact on a Network Licensee's network and involve the research and development, trialling or demonstration of at least one of the following:"
18	NIC	Project Implementation	P44/8.3	Typo "If a separate account is used then sections 8.4 to 8.6 do not apply."	"If a separate account is used then sections 8.4 to 8.7 do not apply."
19	NIC	Project Implementation	P46/8.15	Clarification – DNOs already hold personal information. The Governance document should focus on additional personal information to be collected. "8.15. Where the Project involves the collection of any personal data (as defined in the Data Protection Act 1988) the Funding Licensee must submit a strategy for dealing with this personal data to Ofgem at least two months prior to collecting or using the data. The Funding Licensee or its Project Partners cannot collect or use any personal data until the strategy has been approved by the Authority. The strategy must set out the following"	"8.15. Where the Project involves the collection of any personal data (as defined in the Data Protection Act 1988) beyond that already held , the Funding Licensee must submit a strategy for dealing with this additional personal data to Ofgem at least two months prior to collecting or using the data. The Funding Licensee or its Project Partners cannot collect or use any of the additional personal data until the strategy has been approved by the Authority. The strategy must set out the following"

Response template for NIC and NIA informal governance consultation