

Dora Guzeleva
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Local Grids
Ofgem
9 Millbank
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14 December 2012

Dear Dora

Document F: Notice under Part D of standard condition 49 of the distribution licence to Distribution Services Providers to modify the Cost and Revenue Reporting RIGs (Ref: 149f/12)

Thank you for the opportunity to respond to the above consultation. This response should be regarded as a consolidated response on behalf of UK Power Networks' four distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, South Eastern Power Networks plc, and UK Power Networks (IDNO) Ltd. For convenience, the four licensees are collectively referred to as "UK Power Networks" throughout. Please note that our response is not confidential and can be published via the Ofgem website.

UK Power Networks notes your comment in the covering letter that you are still giving consideration to the inclusion of the 2012/13 annual CRRIGs data in the Well Justified Business Plan submission in July 2013. We would support this change but would request that Ofgem clarify your requirements by the time of the strategy submission in February 2013 to ensure DNOs have sufficient notice to prepare this new information in the prescribed format.

Having reviewed the detailed draft RIG changes, we also have a small number of minor observations:

- Table 'V15A' contains cost and volume data. Logically, therefore, it should have a suffix of 'CV' rather than 'V'.
- While you note in the covering letter the proposal not to include commentary tables, leaving the description in Excel only restricts the length of text that can be used to describe the activity. We would ask you to reconsider this point.
- As the existing losses reporting structures are being dismantled, worksheets 'V16 – Losses DG Adjustment (LAG)' and 'V17 – Losses DG Adjustment (DGA)' and all references to them can also be deleted (see page 62).
- In paragraph 4.51, the bullet 'Half-hourly Settled Connection Point' should be removed as it is only used in the deleted sections.
- Paragraph 4.88 refers to reporting "... based on the activities ... in the preceding Regulatory year and planned for the next year". This is the only reference to any 'forecast' information being required under the Distribution Losses Reporting Requirement as all other references, both in the RIGs and in standard licence condition 44B, refer only to 'reporting' for 2012/13 and 2013/14 being delivered on or by 31 July 2014 and 31 July 2015 respectively. We believe that the words "and planned for the next year" should be deleted.

If you have any questions regarding our response, please contact me in the first instance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Hutton', with a large, sweeping flourish at the end.

Keith Hutton
Head of Regulation
UK Power Networks

Copy: Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks
Jonathan Purdy, Income Incentives Manager, UK Power Networks