

Consultation on cost of equity methodology

Prepared on behalf of the Energy Networks Association (ENW; NPG; SPN; SSE; UKPN)

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- the RIIO process has been good—changing methodology at this stage risks undermining the benefits that have been delivered to date
- it is not clear that directly reading across the CC provisional decision would be appropriate because of differences in regulatory context
- the significant overlap with RIIO-T1 and GD1 may distort investment and consumption choices
- downward pressure on credit ratings is likely as a result of both an increase in regulatory risk and lower cash flows
- developments in the capital markets since publication of the RIIO-ED1 strategy decision do not support a reduction in the cost of equity



NIE control period compared to RIIO control periods Long-term approach more appropriate for RIIO



Source: Oxera.



Developments in forward rates (nominal, %) Increase of ~100bp since strategy decision



Source: Bank of England; Oxera.





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