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By email only to: mark.wagstaff@ofgem.gov.uk

19 May 2014

Dear Mark

Ofgem Simplification Plan 2014/15

Thank you for the opportunity to contribute to the development of Ofgem's Simplification Plan for 2014/15. This letter should be treated as a consolidated response on behalf of UK Power Networks' three licensed distribution businesses: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. It is not confidential and can be published on Ofgem's website.

We have two specific comments to make in relation to the 2014/15 Plan:

1. Transparency

There would be benefit in Ofgem publishing regular, succinct updates that give stakeholders visibility of progress made against this commitment. Furthermore, we would encourage Ofgem to publish an annual report of DNO comparative performance against the various regulatory obligations and incentives. Such a report was produced during the early part of DPCR5 and was of interest to a number of parties, including rating agencies – we strongly believe that it should be reinstated.

2. Regulatory Reporting

We are supportive of the work that is under way with Ofgem's RIIO-ED1 team to review DNOs' reporting requirements and ensure these are appropriate going forward. An important aspect of this work is to consider the timing of such requirements to ensure they are optimal to DNOs in two respects: producing accurate returns (mindful of the data assurance requirements going forward); and submitting the data within a time frame that is compatible with Ofgem's annual iteration process. We strongly recommend that appropriate levels of resourcing and management overview are committed to this work.

We hope that you will find our comments helpful and look forward to the publication of the final Plan.

If you have any questions please do not hesitate to contact me.

Yours sincerely

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

Keith Hutton
Head of Regulation
UK Power Networks

cc: Paul Measday, Regulatory Reporting & Compliance Manager, UK Power Networks