



St Lawrence House
Station Approach
Horley
Surrey
RH6 9HJ

Neill Guha
Costs and Outputs
Ofgem
9 Millbank
London
SW1P 3GE

21 January 2015

Dear Neill,

Statutory Consultation on Data Assurance Guidance and proposed licence changes for Electricity and Gas Transmission Licensees and for Gas Distribution Licensees

Thank you for the opportunity to respond to Ofgem's statutory consultation on Data Assurance Guidance that was released on 17 December 2014.

Upon reviewing the statutory consultation documentation, we consider all of the proposed changes, and the reasons for these changes, are appropriate and reflect discussions with you through previous correspondence and working group meetings.

We also note your statutory consultation is accompanied by an additional letter from Paul Branston. With regard to this letter, we would like to make the following observations:

Post submissions

We will be compliant as at 1 April 2015 and will have all the risk assessments completed. However, we welcome Ofgem's comments in respect of the 1 April 2015 submission and the recognition that this places a workload burden on the GDNs to complete all risk assessments and action plans. We acknowledge your recognition that less focus will be placed on these sources of information.

Benchmarking risk scores

While we accept there are benefits in benchmarking risk scores, it is important for you to recognise each GDN has in place different systems for collating and reporting data which will impact risk scores. Ofgem will need to appropriately consider the limitations of these systems for each GDN when deciding on how best to represent any benchmarking of the risk scores in future. We are willing to work with you moving forward on how best to achieve this.

Thank you again for the opportunity to provide you with additional information. Should you require any further information with regards to our response then please do not hesitate to contact either Richard Murray at richard.murray@sgn.co.uk or Mary Rodgers at mary.rodgers@sgn.co.uk.

Yours sincerely,

Paul Mitchell
Regulation Manager