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Joanna Campbell
Ofgem
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Dear Joanna,

Notice to issue regulatory instructions and guidance under the electricity distribution network operators price control RIIO-ED1

We appreciate the opportunity to comment on the notice to issue the RIIO-ED1 Regulatory Instructions and Guidance (RIGs). Our view is that the current version of the RIGs appears to be generally fit for purpose at this stage, but as the RIIO price control is a substantial change from the previous regime we would expect that during the first year in particular there will be an ongoing need for review and potential changes. As with the introduction of any new processes and templates, issues often only emerge when they are tested with real situations and data, as opposed to dry run trials.

The only area where we think change is absolutely required at this stage is Annex H Customer Service, Appendix 1 – Customer Satisfaction Survey Questionnaires. We have been working with Explain and the other DNOs to ensure the questions within the survey are fit for purpose and we support the changes proposed by Explain in the attached document. We feel these changes would enhance the customer experience of those partaking in the survey and significantly reduce confusion, therefore recommend Ofgem update the RIGs as proposed.

There are a small number of tables specific to our Scottish Hydro Electric Power Distribution (SHEPD) licence area. As above, we believe these are fit for purpose at the current time; we particularly appreciate the splits introduced for Category 1, 2 and 3 events in the M5 Severe Weather table as previously discussed. On the CV15 QoS & North of Scotland Resilience table we plan to populate this on a project by project basis, given the four projects we requested funding for and the final determination from Ofgem.

Tables M10 Shetland and M11 Submarine Cables are two where we expect review and changes to be required. M11 Submarine Cables is likely to be further influenced by the ongoing work with Marine

Scotland, Ofgem and ourselves during ED1, similarly the ongoing work to develop an enduring solution for Shetland may mean M10 has to be updated to reflect decisions during this process, for example on any potential change to our role.

More broadly changes are likely to be required in future not only as a result of real use of the RIGs but also as a result of any reviews and reopeners. Also Ofgem's 24 April decision on the previous RIGs consultation that a separate piece of work will be undertaken to look in depth at performance reporting may produce outputs that drive changes to the RIGs in their current form.

Yours sincerely,

Jenny Rogers

Regulation Adviser, Networks