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By email only to: pmg@ofgem.gov.uk

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Dear Andrew

Draft Forward Work Programme 2015/16

Thank you for the opportunity to comment on Ofgem's draft Forward Work Programme for 2015/16. 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. Our response is not confidential and can be published on Ofgem's website.

We are supportive of Ofgem's objectives, proposed work programme and proposal to group planned work around the six outputs detailed in Ofgem's Corporate Strategy. These constitute an appropriate set of priorities for the year ahead.

Our answers to the three consultation questions are set out below:

1. Ofgem's policy

We note from paragraph 1.8 (page 9) of the consultation document that Ofgem intends to review the DPCR5 close-down mechanisms (legacy mechanisms) and adjust DNOs' revenues. We support the prompt but thorough completion of this work as we originally understood that all these mechanisms would be written before the RIIO-ED1 licence statutory consultation, so that the RIIO-ED1 package could be considered as a whole. It is important to finalise these mechanisms as quickly as possible, to provide clarity around the assessment process and ensure that all of Ofgem's information requirements are properly understood. Without the assessment process being finalised there remains a risk that additional data not included in the RIGs is required.

2. Proposed Key Performance Indicators

We have no comments in respect of this question.

3. Consultation process

Ofgem's consultation process is generally of a very good standard. However, two specific issues came to light in December 2014:

- It was clear from the manner in which the Data Assurance Guidelines (DAG) consultation was conducted that the quality assurance process had not been carried out to Ofgem's usual high standard, as a number of errors were apparent in the appendices. In such an important area of assurance and companies' future compliance, we believe that more forward planning is required to ensure there is adequate time to prepare and assure consultations, so that they fully reflect Ofgem's stated objectives.
- In the run up to the festive period Ofgem published a significant number of consultations on consecutive days; the 'daily update' emails issued on 17 and 18 December contained 25 and 28 items respectively. On an average day the number of publications can vary between four and 10, and such peaks as were experienced on 17 and 18 December put consultees under considerable pressure to provide a considered response. We have also noticed that during the summer months there tends to be a glut of publications followed by a lull.

With the detailed work required to complete the work on DPCR5 closedown, continuing work on the common framework required for RII0-ED1 secondary deliverables and the work signposted by Ofgem on Competition in Connections, we would welcome Ofgem engaging in more detailed planning of milestones with the relevant stakeholders to avoid peaks and troughs in publications and ensure a richer development and consultation process.

We hope that you will find our comments helpful and look forward to the publication of the finalised Programme in March.

If you have any questions about our response, please do not hesitate to contact me.

Yours sincerely



Keith Hutton
Head of Regulation
UK Power Networks

Copy: Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks