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Dear Aris,

Re: Consultation on proposed amendments to the Data Assurance Guidance submissions for network companies

Thank you for the opportunity to respond to this consultation document. In line with our previous NetDAR submissions, we strive to employ the highest standards of corporate governance and take regulatory compliance and assurance very seriously.

Having reviewed the proposed amendments, we have some observations that we would like to draw to your attention.

1. Risk assessment of cost and volumes pack

We do consider the tables within the cost and volumes pack on an individual basis and therefore support the proposal to separate these out as this allows us to ensure appropriate focus on respective tables, based on their risk score.

2. Re-statement of DPCR5 data

We note your proposal that this be treated as a single irregular submission and agree that this is an appropriate treatment.

3. Reporting by exception

We welcome the proposal within the consultation letter and the addition of paragraph 4.3 in the Guidance that we report only those tables where the overall risk rating has changed. However, following discussions with members of the team, we are not convinced that the current drafting has the intended effect. We also suggest that there is potential for this paragraph to conflict with the requirements of paragraph 4.8. We propose revisions to these two paragraphs as follows. Additions are shown in italics and deletions in strikethrough text.

4.3 *Within the Future Submission Section, the* ~~The~~ Licensees are required to report to Ofgem ~~only~~ the Conditions / tables for which their overall risk rating has changed since the previous year's submission. *In addition, Licensees are required to report to Ofgem any Conditions / tables where the overall risk rating remains high or critical but there has been movement in the risk scoring to determine this.*

4.8 For submissions with a critical ~~or~~ high Risk rating *that the Licensee is required to report on in accordance with paragraph 4.3*, detailed Data Assurance Activity is required. The detailed explanation should include:

- A description of actions taken;
- The specific aims/outcomes of the actions;
- The expected and actual completion date;
- An indication of whether the action is completed or ongoing.

For the avoidance of doubt, where Licensees are not required to report a submission under paragraph 4.3, Licensees are not required to provide this explanation.

We believe this wording gives effect to your intentions but are happy to discuss alternatives.

4. Effective date

The consultation letter indicates that Ofgem intends the new and modified provisions to take effect from 31 January. We understand that Ofgem considers the consultation to also take the form of the Notice required under paragraphs 45.10 and 45.11 of the Standard Licence Conditions.

We hope that this response will assist you in progressing these modifications. Please feel free to contact me if you would like to discuss any parts of this response.

Yours sincerely



Jen Carter
Regulation Manager