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Dear Aris

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

This response is on behalf of Scottish Hydro Electric Power Distribution Plc, Southern Electric Power Distribution Plc and Scottish Hydro Electric Transmission Plc together referred to as Scottish and Southern Energy Power Distribution (SSEPD) in this response. SSEPD welcomes the opportunity to respond to Ofgem's consultation on the proposed amendments to the Data Assurance Guidance submissions for network companies.

SSEPD has reviewed the updated submission list for electricity distribution network operators (DNOs) and electricity transmission operators (TOs) outlined in Annexes A and C respectively, as issued as part of Ofgem's consultation issued on 16 December 2015. Generally speaking, SSEPD is supportive of Ofgem's proposed amendments to the Data Assurance Guidance (DAG) submissions for network companies, however we have a number of comments which we would welcome clarification and consideration on, these are summarised below.

We would welcome clarification on section 4.3 of the DAG guidance document which requires network companies to submit only the tables where the overall risk rating has changed since the previous DAG submission. Therefore, if we submit a table with an overall risk rating of 'High' or 'Critical' as part of the NetDAR and this table or condition remains as High or Critical in the following

year's submission, are we no longer required to submit this as part of the NetDAR for the following year

On page 6 of the 'DAG guidance document v1.2' paragraph 1.10, Ofgem refer to their 'Open letter on Regulatory Compliance dated 28 March 2014'. However, on 15 June 2015, Ofgem issued another letter entitled 'Annual Strategic enforcement priorities for 2015-16'. Can you confirm if the June letter supersedes the March reference?

Electricity Distribution

We support Ofgem's proposal for DNOs to submit a separate assessment for the majority of the individual tables rather than the current single assessment approach. However, we would welcome clarification on the rationale for the inclusion of row 6 'Cost & Volumes' of the risk assessment table when considering that Ofgem's proposal is to move away from a single assessment approach to a separate assessment for the majority of the tables.

We are comfortable to restate our DPCR5 data in the format of the current submission list (i.e. a single assessment report) by the 31 July 2016. However, it must be noted that any data assurance required for the restatement of the DPCR5 data in the current RIIO ED1 format must be proportionate for a level of detail which has been imposed retrospectively. We would also welcome clarification that the restatement of the DPCR5 data in RIIO terms is only in relation to the Costs and Volumes pack, as indicated in number 147 of the risk assessment template, rather than all of the RIGs packs?

Electricity Transmission

SSEPD agrees with Ofgem's proposed revisions to the submission list for TOs in order to reflect the modifications in the RIGs. However, we have a few comments and observations which we would welcome clarification from Ofgem:

- The updated submission list for TOs includes Table 5.9 'Non-lead Unit Costs: Network Data' which is still currently under development and yet to be finalised. We recommend that this reporting requirement is either removed or 'greyed out' from the submission list until it has

been finalised as it is highly unlikely that TOs will be able to complete risk assessments in time for the submission of the NetDAR at the end of February?

- We would like to highlight that many of the licence conditions may contain multiple submission requirements, some of which may be regular, irregular or adhoc submissions. We propose that a clearer approach would be to list the licence condition and also the relevant paragraph number within the licence condition, for example, Special Licence Condition (SpC) 3D.7 Stakeholder Engagement. At the moment the current submission list (in Annex C) only makes reference to SpC 3D to the single submissions (consisting of two parts), however this licence condition also contains irregular submissions under 3D.25 and 3D.34.
- The updated submission list for TOs still includes SpC 2I Independence of and appointment of managing director of the Transmission business, however this submission is 'greyed out'. As per previous correspondence¹ with Ofgem, can we receive clarification as to whether this regular submission is being withdrawn from the submission list for Electricity Transmission Operators?
- Under SLC B15 RRP Table 6.15.1 and 6.15.2 appear to state NGET instead of all ENO's.
- Appendix C, line 19 SLC B15 2.5 "Wider Works: Totex" and the requirement for TO's to publish the Totex data on its website was changed and a further table added "2.6 Published Wider Works".

We look forward to receiving clarification on the comments raised within our response. Please do not hesitate to get in touch should you have any questions regarding any of the information provided within our response.

Yours sincerely,
(by email only)

Sam Torrance
Regulation, Networks

¹ 6 October 2015, A joint TO letter from SP Transmission and SHE Transmission to Ofgem "Joint TO Letter: Managing Director of Transmission Report- Redundant Licence Obligation"