

Maxine Frerk
Ofgem
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By email only to: RIIO.ED1@ofgem.gov.uk

22 March 2016

Dear Maxine

Notice under Part B of Standard Condition 50 (Business Plan Commitment Reporting) of the Electricity Distribution Licence of proposed Business Plan Reporting Guidance

Thank you for the opportunity to comment on this Notice. This response should be regarded as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc and South Eastern Power Networks plc. For convenience, the three licensees are collectively referred to as "UK Power Networks" throughout. Please note that our response is not confidential and can be published via the Ofgem website.

We are broadly comfortable with the proposed guidance and have provided a small amount of detailed feedback on the draft guidance in the appendix to this letter to help improve clarity for all stakeholders.

If you have any questions or queries on this repose then please do not hesitate to contact me in the first instance.

Yours sincerely



James Hope
Head of Regulation & Regulatory Finance, UK Power Networks

Copy Colin Nicholl, Head of Business Planning, UK Power Networks
Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks
Clothilde Cantegreil, Ofgem

Appendix 1

1. We are comfortable with the repetition of the licence obligations in section 1 of the guidance as this makes it easier for the reader as everything is in one document. However we believe that where the guidance usefully goes beyond what is required in the licence (email addresses and the ability to submit one report per group of companies), this should be made clear.
2. We note in paragraph 1.5 that the latest version of the guidance is the one on the Ofgem website. We seek confirmation from Ofgem that this guidance will be added to the following webpage which contains the master list of all RIIO-ED1 RIGs/guidance documents as developed by Anna Rossington and her team.
(<https://www.ofgem.gov.uk/publications-and-updates/riio-ed1-guidance-documents>)
3. In paragraph 4.3 there are references to a RIGs worksheet “SI11”. We believe this reference should be “SI1 – Performance Summary”. This term also appears in paragraph 5.1.
4. The reference in paragraph 4.3 to a £5 rebate scheme should be clarified to remove the reference to a specific rebate value as we understand that not all DNOs rebates were £5. Our suggestion would be to rename it “agreed 2014/15 DNO rebate”.
5. The references in paragraph 4.3 to “absolute performance” for CIs and CMLs should be aligned with the wording in the RIGs worksheet SI1 (i.e. to refer to “unweighted, including exceptional events”. Furthermore, for clarity for stakeholders we believe that CI and CML performance excluding exceptional events should also be included in the summary table alongside the “absolute performance”.
6. In respect of the latter sections of paragraph 4.3 we have two observations:
 - a. It is unclear whether a single broad measure of customer satisfaction score is required or whether it should be provided broken down to the three component parts.
 - b. For the non-qualitative sections under the “Additional information...” bullet e.g. Broad Measure of Customer Satisfaction there is no prescribed format or layout, however the information will be common across DNOs. This may result in the information being presented differently across DNO groups which may ultimately confuse stakeholders. We would suggest that Ofgem specify the format e.g. table/graph that the information should be displayed in.
7. The use of “must” in paragraph 4.9 means that a DNO could be found in breach of the guidance if it does not explain every technical term of acronym in its report. Replacing “must” with “should” would resolve this issue and still oblige DNOs to provide a thorough explanation of such terms.
8. It is unclear whether the requirements of paragraph 5.1 are for DNOs to include a spreadsheet MS Excel table as an appendix to the report or whether a pdf’d version of the table as an appendix to the report is acceptable. We believe that the latter is more appropriate as it will enable a single document to be downloaded by readers.