

Mark Wagstaff  
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Dear Mark

### **Ofgem Simplification Plan 2016/17**

Thank you for the opportunity to comment on Ofgem's Simplification Plan for the next regulatory year. 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. It is not confidential and can be published on Ofgem's website.

Having reviewed the Simplification Plan alongside Ofgem's Corporate Strategy and draft 2016/17 Forward Work Programme, we would like to raise the following points:

- In the interests of ensuring proportionate regulation, we recommend that Ofgem review the usefulness of the information submitted by DNOs during the first year of the RIIO-ED1 price control period to determine whether it fulfils the purpose for which it is intended.
- As previously mentioned in our 10 March 2015 response to Ofgem's consultation on the 2015/16 Simplification Plan, we believe that Ofgem should engage in more detailed planning of milestones with relevant stakeholders prior to launching consultations. This would help to avoid the peaks and troughs in publications that we have observed previously and would also give consulted parties more time to prepare a considered response, thus ensuring a richer development and consultation process.
- Following the recent structural changes within Ofgem, we believe that it is important that there is continued coordination across the various functions, to ensure consistency in the messages delivered to industry stakeholders; for example, when launching consultations, as referred to above.

We hope that you will find our comments helpful. If you have any questions about our response, please do not hesitate to contact me.

Yours sincerely



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

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