

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
1	Informal Consultation	WPD	15.0 - Ref. docs	Should this reference be NADPR RIGs v3 as associated with the statutory consultation issued on 23 March 2012	Agree - change made	Closed
2	Informal Consultation	ENWL/WPD/SPEN	15.3	Do these timescales also apply to TMA methodology?/Should the TMA Permit Costs adjustment be included here also, given that information in the PAS may relate to this?/ Should there not be additional bullets for Traffic Management permit costs and Flood Prevention adjustment as these are also detailed in this chapter.	In line with our intention to be proportionate in our approach to assessing these methodologies, we note that the process associated with the Traffic Management Permit Costs and Flood Prevention adjustments are not as detailed as those set out in the table. On this basis, we do not need to add them to the table.	Closed
4	Informal Consultation	NPG	15.3	In paragraph 15.5 these are called methodologies.	Agree - change made	Closed
5	Informal Consultation	NPG	15.3	This is no longer the section title. The relevant term now seems to be 'HVP Re-opener adjustment'	Agree - change made	Closed
7	Informal Consultation	ENWL	15.3	Later paragraphs refer to these as methodologies – suggest change wording here to make clear	Agree - change made	Closed
8	Informal Consultation	UKPN	15.4 (Table)	Timetable section: would this be better after 15.18	We recognise this could go in a number of places but have decided to retain up front in Chapter 15 and Chapter 16 for clarity.	Closed
9	Informal Consultation	NPG/UKPN/WPD	15.4 (Table)	Table title doesn't sound right – change to 'Timetable for assessment and notification'?	Agree - change made	Closed
10	Informal Consultation	ENWL	15.4 (Table)	Not needed - 'Notification to licensee of the adjustment included in the calculation of a revised OLREV value'. Remove from table.	Agree - change made	Closed
11	Informal Consultation	WPD/UKPN	15.4 (Table)	Need to provide clarification of who does what in each stage i.e. Authority or Licensee/ These three need to state who is conducting each action	Agree - change made	Closed
12	Informal Consultation	NPG	15.4 (Table)	Change 'After 31 October 2016' to 'Between 31 October 2016 and 28 February 2017'	Agree - change made	Closed
13	Informal Consultation	NPG	15.4 (Table)	Change 'Authority' to 'the Authority' and licensee to 'the licensee'	Agree - change made	Closed
14	Informal Consultation	NPG	15.4 (Table)	Change 'After 30 September 2017' to 'By DD/MM/YY'	Agree - change made	Closed
15	Informal Consultation	NPG	15.4 (Table)	Change '30 November 2017' to 'By 30 November 2017'	Agree - change made	Closed
17	Informal Consultation	UKPN	15.4 (Table)	Should be last date ie that when it must be given	Agree - change made	Closed
18	Informal Consultation	NPG	15.5	Authority is not defined.	No need to add definition as it is defined in the Act.	Closed
19	Informal Consultation	WPD	15.5	The Authority does not determine the 'content' of the PAS.	Agree - change made	Closed
20	Informal Consultation	UKPN	15.6	Add text to clarify that the information requested by the Authority will be for submission in the PAS.	Agree - change made	Closed
22	Informal Consultation	NPG	15.9	The methodologies are not being subjected to the Performance Assessment, hence delete reference to methodologies.	Agree - change made	Closed
23	Informal Consultation	SPEN/ENWL	15.9	Update to include reference to ongoing discussion between the Authority and Licensee during the Performance Assessment (Nov 16 to Feb 17) to allow the Authority to obtain further information and clarifications as required. Refer to Supplementary Questions	Agree - new paragraph added	Closed
24	Informal Consultation	WPD	15.9	This implies that the Performance Assessment is for the assessment of the methodology rather than for the subject covered by the methodologies	Agree - change made	Closed
25	Informal Consultation	NPG	15.10	Does the Authority determine the adjustments at this stage? Would 'consider' be better at this stage?	Agree - change made	Closed
26	Informal Consultation	NPG	15.10	Preliminary View' - needs a definition if it is using initial capital letters.	There is already a definition for Preliminary View	Closed
27	Informal Consultation	UKPN	15.12	Cannot be two month consultation with more than this for submission of additional data? Is this last sentence needed.	Consider current text is clear and no change required.	Closed
28	Informal Consultation	SPEN	15.13	Paragraph Reference - Think this should be 15.12 as this is where the review of the consultation is detailed.	Reference has been updated.	Closed
29	Informal Consultation	NPG	15.17 (Table)	'DPCR5 Flood Prevention adjustment' is not in CRC3A.	Agree - we are consulting on changes to CRC3A alongside this consultation.	Closed
30	Informal Consultation	NPG	15.17 (Table)	This is no longer the section title. The relevant term now seems to be 'HVP Re-opener adjustment'	Agree - change made	Closed
31	Informal Consultation	WPD	15.17 (Table)	This also requires a change to table 1 CRC 3A. Otherwise CRC3A and this table would be inconsistent.	Agree - change made	Closed
32	Informal Consultation	NPG	15.45	A number of reference have updated automatically – this may reflect edits which altered paragraph numbers.	Checked references	Closed
33	Informal Consultation	NPG	15.87	Should these terms be defined in the glossary rather than in a footnote?	Agree - change made	Closed
34	Informal Consultation	UKPN/NPG	15.88 -15.90	Suggest deleting paragraph as it is unnecessary in the revised Handbook/ Should this whole section now be deleted? It is no longer necessary once the modification is made. The equivalent content has been deleted from the load related reopener section, so deleting it here would also be consistent with the rest of the drafting.	Agree - paragraph 15.88 has been deleted but 15.89 and 15.90 retained as they impact other parts of the drafting.	Closed
36	Informal Consultation	ENWL/NPG/UKPN/WPD	15.91	Use of - 'see definition in Glossary' - it is not necessary to refer to the glossary in this way/ Delete superfluous reference/No need for the reference to the Glossary. All capitalised items should be in the glossary/ Not clear what definition this is intended to point to.	Agree - change made	Closed
37	Informal Consultation	NPG/WPD	15.91(b)	As above, this reference - 'see definition in Glossary' is unnecessary.	Agree - change made	Closed
38	Informal Consultation	NPG/WPD/UKPN	15.91(b)	'permit' is not capitalised and does not exist in the glossary. Changed to Permit Costs which is defined/ Capital letters should be used to denote the defined term being referred to/As above but note the term isn't capitalised so is not a defined term	Agree - change made	Closed
39	Informal Consultation	WPD	15.93	Should this refer to 15.100 (ix)?	Agree - change made	Closed
40	Informal Consultation	WPD	15.93	Delete last sentence - this is covered by para 15.100 (ix).	Agree - change made	Closed
41	Informal Consultation	NPG	15.94	This is a defined term - 'Traffic Management Permit Costs Legacy Assessment Methodology' but the definition just refers back to this chapter.	Agree - change made	Closed
42	Informal Consultation	NPG	15.97	Can't find this term - 'DPCR5 Traffic Management Act Permit Costs' in the glossary	Agree - change made	Closed
43	Informal Consultation	WPD	15.100(i)	Paragraph format	Agree - change made	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
44	Informal Consultation	SSE	15.100 (iii)	The reference to DPCR 5 IQI incentive rate as defined in the glossary is the adjusted incentive rate for slow money whereas there is a mixture of fast and slow money in TMA costs. The relevant IQI incentive rate should be used as is the case for LRE and HVP.	Agree - change made	Closed
45	Informal Consultation	WPD	15.100(viii)	Unclear as 15.94 refers to both interim adjustment and logged up costs; better to say "of any TMA Permit cost reopener adjustment during the DPCR5 period"	Agree - change made	Closed
46	Informal Consultation	UKPN	15.102(i)	Needs to ref 15.100 or very confusing as to which (i) is being referred to bearing in mind the continuation of the roman numeral numbering across main paragraph numbering	Agree - change made	Closed
47	Informal Consultation	UKPN/WPD	15.103	Is this correct as it refers only to Opening Base Revenue Allowances – not sure there were any Old wording (ie a & b below) worked better and was consistent with prior drafting/ Does this para also need to refer to deducting any previously calculated adjustments e.g.if recalculated in 2018, need to deduct value calculated in 2017?	Disagree - this step is correct and reflects the PCFM VV tab of the legacy workbook.	Closed
49	Informal Consultation	SSE	15.124	Paragraph reference does not appear to align with paragraph content.	Agree - change made	Closed
50	Informal Consultation	WPD	15.124	This is a defined term 'DPCR5 Load Related Re-opener Adjustment'	Agree - change made	Closed
51	Informal Consultation	WPD	15.125 (b)	Capitalise 'General Reinforcement' as it is a defined term	Agree - change made	Closed
52	Informal Consultation	NPG	15.126	'Was incurred' rather than 'occurs'	Agree - change made	Closed
53	Informal Consultation	SSE	15.128	Reference to 'Special Condition CRC 18'. Believe it would be more correct to refer to Charge Restriction Condition 18 and remove reference to Special Condition.	Agree - change made	Closed
54	Informal Consultation	NPG/UKPN/WPD	15.129	Should this say 'load related' rather than LRE for consistency with the rest of the drafting?/ Should it be Load Related Reopener? Note there are other instances of this/ LRE is not yet defined and not in Glossary	Agree - change made	Closed
55	Informal Consultation	WPD	15.131(b)	Amount should be within the apostrophes as the full defined term is 'Load Related Post-threshold Amount'	Agreed. However, we are leaving this in for the purpose of clarity.	Closed
56	Informal Consultation	BG/NPG	15.131	Clearer description that is consistent with the HVP reopener description in 15.199/ We had expected this drafting to be changed – in line with equivalent change in HVP?	Agree - change made	Closed
57	Informal Consultation	SSE	15.131	Delete reference to '(or saved expenditure)'. This does not add anything and overlooks the fact that incurred expenditure above 120% is also captured.	Agree - change made	Closed
58	Informal Consultation	UKPN	15.131	Capitalise 'Load Related Re-opener'	Agree - change made	Closed
59	Informal Consultation	UKPN	15.133	There are a mix of timings between this section (preliminary view) and annex (initial assessment) Timings would be best in this section with Annex left to the approach.	Preference to keep structure as is to avoid repetition in individual sections.	Closed
60	Informal Consultation	ENWL	15.135(a)	The Authority knows the proportion of Aggregate Baseline Allowance and so does not need to decide	Agree - change made	Closed
61	Informal Consultation	SPEN	15.135(b)	This statement - the proportion of Load Related Post-threshold Amount - is not required as the start of the paragraph provides a clear scope.	Agree - change made	Closed
62	Informal Consultation	UKPN	15.139	And subject to the preliminary view from ofgem? if so it would make 15.142 redundant	Preference to keep structure as is. No change.	Closed
63	Informal Consultation	SPEN	15.140(a)	Not required as set out earlier. It may also be worthwhile to include a definition of 'low volume high cost' in the glossary.	Agree - change made	Closed
64	Informal Consultation	WPD	15.140(e)	Two sentences have been joined incorrectly so sentence does not make sense. Also footnote 4 has been deleted	Agree - change made	Closed
65	Informal Consultation	WPD	15.141	Prior to this point in HVP there is a statement on how profiling will be applied. Should there be similar points made here? Refer to para 15.210 and 15.211.	Agree - change made	Closed
66	Informal Consultation	SPEN/SSE	15.143	This paragraph number should be removed. This will impact on all future paragraph numbers and may also impact paragraph references./ Paragraph reference has no text associated with it.	Agree - change made	Closed
67	Informal Consultation	NPG	15.145	Can't find definition for 'LI Network Outputs Gap'	Agree - change made	Closed
68	Informal Consultation	NPG	15.145	The text should also include the following requirements: ' , that there is a NOMs Network Outputs Gap, and that there should be a DPCR5 NOMs Revenue Adjustment'. This is necessary because the holistic nature of the overall NOMs assessment could lead to no revenue adjustment even if there is an LI network outputs gap. So it is necessary for there to be an LI network outputs gap AND a DPCR5 NOMs Revenue Adjustment	Agree - change made	Closed
69	Informal Consultation	NPG	15.147	For the same reason, insert: "or the overall NOMs Network Outputs Gap (used in the calculation of the DPCR5 NOMs Revenue Adjustment, and again prior to the application of the incentive rate) if this is lower,	Agree - change made	Closed
70	Informal Consultation	SPEN	15.147	Replace "LI Network Outputs Gap" with "LI component of the NOMs Network Outputs Gap"	Agree - change made	Closed
71	Informal Consultation	WPD	15.148	This is not a 'new' post double-count threshold. It is the first post double-count threshold amount.	Agree - change made	Closed
72	Informal Consultation	WPD	15.148	This is called an 'adjustment threshold' rather than an 'adjustment amount' in 15.131	Agree - change made	Closed
73	Informal Consultation	UKPN/NPG	15.152	Inconsistent wording with above "LI Network Outputs Gap". This continues below/ Should this be 'LI Network Outputs Gap adjustment' for consistency with above? (Appears a number of times in the text below.)	Agree - change made	Closed
74	Informal Consultation	WPD	15.152	Defined term Adjustment should be capitalised	Agree - change made	Closed
75	Informal Consultation	SSE	15.152 (i)	Superfluous comma in opening line.	Agree - change made	Closed
76	Informal Consultation	ENWL	15.152 (v)	Whilst we agree this change is correct - reference to individual sub paras - the original wording is used on numerous occasions throughout the existing handbook. We suggest this change is not made to avoid any confusion.	Agree - change made	Closed
77	Informal Consultation	WPD	15.152(i)	The values used in (i) are total DPCR5 values. The subsequent steps refer to regulatory years. There needs to be a profiling stage inserted between (i) and (ii).	Agree - change made	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
78	Informal Consultation	NPG	15.152(ii)	How profiled amounts are arrived seems unclear from the above, as some of the description is within the Annex and some is in the text above. The other aspects are probably OK, as all covered somewhere except for profiling of the double count adjustment. There is a paragraph for profiling in the HVP section which could be used here	Agree - change made	Closed
79	Informal Consultation	NPG	15.156	We have suggested this drafting to allow for re-determination of the double counting adjustment by November 2018 in the event the output adjustment is also re-determined at that later date. If the drafting in the NOMs section changes, this section should also change	Agree - change made	Closed
80	Informal Consultation	WPD	15.157	This is not deleted in other sections. Is there a reason why it is being deleted in section vii?	Agree - change made throughout	Closed
81	Informal Consultation	UKPN	15.187	Does it (the Adjustment) actually mean the provision for reviewing the expenditure or the process of calculating the value of the adjustment?	Agree - change made	Closed
82	Informal Consultation	SPEN	15.187	Amended as bullets below detail 4 steps.	Agree - change made	Closed
83	Informal Consultation	SSE	15.187	Opening paragraph refers to 'a three stage process', however the subsequent sub-paragraphs suggest this is a four stage process.	Agree - change made	Closed
84	Informal Consultation	UKPN	15.188	Consistency with title change	Agree - change made	Closed
85	Informal Consultation	WPD	15.187	Need to align terminology throughout document – should be "High Value Projects Re-opener Adjustments" here?	Agree - change made	Closed
86	Informal Consultation	WPD	15.187	To align with definition - DPCR5 High Value Project Adjustments	Agree - change made	Closed
87	Informal Consultation	WPD	15.187 (i)(a)	"HVP" term not yet defined and not in Glossary	Agree - change made	Closed
88	Informal Consultation	WPD	15.187 (i)(a)	To align with definition	The current structure reflects the previous Handbook draft. In addition, we consider that, because of the double-counting adjustment, it would be clearer to include the process for determining the HVP Networks Outputs Gap in Chapter 15 as well.	Closed
89	Informal Consultation	UKPN	15.187(i)(a)	Timings and determination of HVP outputs need to be in 15 or 16 – currently process in 15 and timings in 16	Agree - change made	Closed
90	Informal Consultation	SSE	15.187(i)(b)	Reference to 'cost levels' in opening line does not seem appropriate. Suggest this is replaced by 'relating to expenditure , using ...'.	Agree - change made	Closed
91	Informal Consultation	SSE	15.187(iv)	Perhaps helpful to include relevant reference to section on 'Adjustment for double-counting' (paragraph 15.214-15.219)	Consider current text is clear and no change required.	Closed
92	Informal Consultation	SPEN	15.188	Reopener only deal with changes in expenditure; activity level changes are dealt with through the HVP outputs assessment (b)	Agree - change made	Closed
93	Informal Consultation	UKPN	15.188(b)	More of an introductory para so moved order	Consider current structure is clear and no change required.	Closed
94	Informal Consultation	UKPN	15.189	Annex C1 and C2 appear in reverse order when you read the main document so it would be good to reverse the numbering of them for clarity	Consider current structure is clear and no change required.	Closed
95	Informal Consultation	UKPN	15.191	Have deleted "Network" to align with subsequent paras (also aides simplicity of reading) but checks are required for other instances	Defined term is HVP Network Outputs Gap. No change required	Closed
96	Informal Consultation	ENWL	15.193	Para reference -15.10	Agree - change made	Closed
97	Informal Consultation	SPEN	15.193	Reference should be to 15.10	Agree - change made	Closed
98	Informal Consultation	WPD	15.193	15.10 is used in the load related (section vii para 15.136). Make consistent.	Agree - change made	Closed
99	Informal Consultation	SSE	15.194	To align with Appendix 1 Glossary, reference to 'Total HVP Outputs Gap' should be 'Total HVP Network Outputs Gap'.	Agree - change made	Closed
100	Informal Consultation	SSE	15.194	In the case of HVPs, where there is both a reopener element and an outputs element, we are mindful that the timing profile for the former is actual expenditure and the latter is allowance. Whilst unlikely to be a significant issue, we are mindful that this is potential source of conflict where both elements of HVP Close Out are in play.	We consider that the most appropriate way to profile the HVP Network Outputs Gap is to do so based on allowances. We have decided not to amend existing text or make changes to already agreed upon policy unless absolutely necessary.	Closed
101	Informal Consultation	SSE/SPEN	15.195 (a)	This should include reference to 'restated in 2012/13 prices'/ Expected this to be 12/13 prices	Current drafting is correct.	Closed
103	Informal Consultation	NPG	15.195(b)	Output gap is already expressed as a negative number in 1.26 and 1.27 of Annex C2, so this step is not required. As a general rule, it is safer to say 'expressed as a negative number' or 'expressed as a positive number' where the intent is that the value should take one sign or another	Agree - change made	Closed
104	Informal Consultation	WPD/NPG	15.198(a)	Network Outputs are reviewed as part of the HVP Network Outputs Adjustment/ This should be deleted here – the outputs assessment is handled in the HVP outputs assessment, not in the reopener adjustment.	Agree - change made	Closed
105	Informal Consultation	NPG	15.198(a)	'HVP Actual Incurred Expenditure'?	Agree - change made	Closed
106	Informal Consultation	WPD	15.199(b)	Threshold in not capitalised in the definition	Agree - change made	Closed
107	Informal Consultation	NPG	15.199	See our comments on the load related reopener and defined terms – the form of words used here works well and should be used in the other sections as well.	No change required for HVP.	Closed
108	Informal Consultation	SSE	15.201	Reference to 'a review of cost levels' does not seem appropriate. We believe this paragraph would be better worded to read: 'The Authority will carry out a review of the licensee's DPCR5 HVP Actual Incurred Expenditure as specified in the HVP Re-opener Legacy Assessment Methodology in Annex C1 '.	Agree - change made	Closed
109	Informal Consultation	NPG	15.201	'Cost levels' is unclear. Could use 'HVP Actual Incurred Expenditure'?	Agree - change made	Closed
110	Informal Consultation	NPG	15.201	15.200 Change to 'HVP Actual Incurred Expenditure' to be consistent with LRE section?	Agree - change made	Closed
111	Informal Consultation	UKPN	15.202	I think this should form part of the first bullet as the second bullet does not make sense with this in the opening wording	Agree - change made	Closed
112	Informal Consultation	ENWL	15.204	Para reference -15.10	Checked references	Closed
113	Informal Consultation	SPEN	15.204	Should be to 15.10	Checked references	Closed
114	Informal Consultation	WPD	15.204	Reference - 15.10?	Checked references	Closed
115	Informal Consultation	UKPN	15.207	X ref needs updating throughout this section	Checked references	Closed
116	Informal Consultation	NPG	15.207	Same point as above – change to 'HVP Actual Incurred Expenditure'?	Agree - change made	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
117	Informal Consultation	SSE	15.208 (e)	The reference should not be to 'efficient expenditure'. To reflect wording used elsewhere, suggest this subparagraph is replaced with 'is deemed consistent with the definition of efficiency as provided in paragraph 1.11 of Annex C1'.	Consider that existing wording is sufficiently clear as a result of paragraph reference. No change required.	Closed
118	Informal Consultation	SSE	15.209 (a)	Suggest amending paragraph to read 'the licensee's total DPCR5 HVP Efficient Qualifying Expenditure is sufficiently 120% higher than its Aggregate Baseline Expenditure Allowances for their to be a HVP Post-Threshold Amount'	Consider paragraph reference provides sufficient clarity. No change required.	Closed
119	Informal Consultation	WPD	15.209(a)	Defined term - HVP Efficient Qualifying Expenditure	Agree - change made	Closed
120	Informal Consultation	SSE	15.210 (a)	To align with Appendix 1 Glossary, reference should be to 'Aggregate Baseline Expenditure Allowance' (not 'Aggregate Baseline Allowance Figure').	Agree. However, our preference is to leave it in for clarity.	Closed
121	Informal Consultation	ENWL	15.210(a)	The Authority already knows this	Consider that text adds clarity and should be left in. No change.	Closed
122	Informal Consultation	WPD	15.210	An application by a licensee will be seeking increases to expenditure allowances not reductions.	Agree - change made	Closed
123	Informal Consultation	NPG	15.211	For consistency throughout the document, this should always say either 'an' or 'a' HVP - whereas at present there are some instances of both (this sub-section seems to align on 'a')	Agree - change made	Closed
124	Informal Consultation	ENWL	15.212	Para reference -15.10	Checked references	Closed
125	Informal Consultation	SPEN	15.212	Should be 15.10	Checked references	Closed
126	Informal Consultation	WPD	15.212	Reference - 15.10?	Checked references	Closed
127	Informal Consultation	UKPN	15.214	No determination under this para. Determination in 15.203	Agree - change made	Closed
128	Informal Consultation	SSE	15.214	Superfluous punctuation in row 6.	Agree - change made	Closed
129	Informal Consultation	NPG	15.215	This works only if it is clear that this will be expressed as a positive number. Perhaps something should be added to the definition to clarify this (but it would be necessary to confirm that no instances assume it is a negative number)	Agree - change made	Closed
130	Informal Consultation	NPG	15.215	This doesn't specifically say before application of the IQI incentive rate or DPCR5 Network Outputs Incentive rate (as in the equivalent LRE section), although it is ok provided that it continues to point the right paragraph (i.e. before the IQI incentive rate is applied).	Consider current text is clear and no change required. Definition of HVP Network Outputs is clear that this is prior to application of IQI or penalty rate.	Closed
131	Informal Consultation	WPD	15.216	It is not a 'new' post double count amount. This is the first time it is calculated.	Agree - change made	Closed
132	Informal Consultation	WPD	15.216	It is called an 'adjustment threshold' in 15.199	Agree - change made	Closed
133	Informal Consultation	SSE	15.220 (i)	The amounts referred to in subparagraphs (a) and (c) are positive values; the value referred to in (b) is negative. It would appear that these should be on a consistent basis.	Agree - change made	Closed
134	Informal Consultation	WPD	15.220(c)(ii)	This should not make any reference to double counting because double counting has already been dealt within prior steps. This should make reference to the adjustment values being from (i).	Agree - change made	Closed
135	Informal Consultation	WPD	15.220(c)(iii)	Should this be step ii i.e. after profiling	Agree - change made	Closed
136	Informal Consultation	WPD	15.220(c)(iv)	Should this be step ii i.e. after profiling	Agree - change made	Closed
137	Informal Consultation	WPD	15.220(c)(iv)	Should this be step ii i.e. after profiling	Agree - change made	Closed
138	Informal Consultation	WPD	15.220(c)(vi)	Replace (v) with (iv)	Agree - change made	Closed
139	Informal Consultation	WPD	15.220(c)(vii)	Should be step (vii)	Agree - change made	Closed
140	Informal Consultation	WPD	15.220(c)(vii)	Should reference step (v)	References checked.	Closed
141	Informal Consultation	WPD	15.220(c)(viii)	See earlier comment re: subtracting any previous determinations in the event of a redetermination.	Agree - change made	Closed
142	Informal Consultation	WPD	15.220(c)(viii)	Numbering incorrect; no step (v) and two steps (vi).	Agree - change made	Closed
143	Informal Consultation	SPEN	15.220(iv)	These steps reference sub para (i). However at this step the post double counting value from sub para (ii) may be used. The referencing needs to be reviewed to make this clear.	Agree - change made	Closed
144	Informal Consultation	SPEN	15.220(iv)	We believe this should be 2012/13 time value basis consistent with the other calculations.	Disagree. Current wording is correct.	Closed
145	Informal Consultation	WPD	15.221	Align with definition of the methodology - DPCR5 High Value Projects Re-opener Adjustment	Agree - change made	Closed
146	Informal Consultation	UKPN	15.223	Repeated text - 'for the purpose'.	Agree - change made	Closed
147	Informal Consultation	SPEN	15.225	This is inconsistent with the drafting for the LRE reopener. Text should be deleted to provide consistency.	Agree - change made	Closed
148	Informal Consultation	WPD	15.283	Reference to 'finalised regulatory reporting' is an unnecessary constraint	Agree - change made	Closed
149	Informal Consultation	SSE	15.283 (iii)	Suggest that this would work better if it resulted in the lower of the two values (i.e. cap or actual expenditure) being taken forward to future steps, e.g. '(iii) The lower of the total derived under step (ii) above and the cap amount of £2.7 m will be used in future steps as the revised total'.	Agree - change made	Closed
150	Informal Consultation	SSE	15.283 (v)	It is not clear how SSEH's '£ per risk reduced value achieved' will be calculated.	Agreed with SSE.	Closed
151	Informal Consultation	SSE	15.283 (vi)	Suggest amending paragraph to read 'If SSEH's '£ per risk reduced value achieved' is higher than the upper quartile £ per risk calculated at step (iv) above, then the Authority will ... '	Agree - change made	Closed
152	Informal Consultation	ENWL	15.283(iv)	Not clear where this will be obtained from. Paragraph 15.284 suggests that this will be from the Authority's DPCR5 price control workings. It will therefore be simpler to quote the value here.	Agree - change made	Closed
153	Informal Consultation	UKPN	15.306	Should be 'Regulatory Year'	Agree - change made	Closed
154	Informal Consultation	WPD	16.0 (Reference docs)	Should this reference be NADPR RIGs v3 as associated with the statutory consultation issued on 23 March 2012	Agree - change made	Closed
155	Informal Consultation	UKPN	16.3	Methodology set out in 15 and referred to here but timings given here not in 15	This is indeed the case. However, as the final adjustment will be made under chapter 16 and not chapter 15 we have kept the timings here.	Closed
156	Informal Consultation	WPD	16.3	Again should TMA be included here? Incremental Admin costs impacts RRI.	This section covers consultation and adjustment timings. These do not apply to TMA. This does not affect the impact of any TMA adjustment on the RRI.	Closed
157	Informal Consultation	WPD	16.4	Should this reference Table 16.1?	Agree - change made	Closed
158	Informal Consultation	ENWL	16.4 (Table)	Row with 'Notification to licensee of the adjustment' is not needed	Agree - change made	Closed
159	Informal Consultation	ENWL	16.4 (Table)	Row with 'Notification to licensee of the adjustment' is not needed	Agree - change made	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
160	Informal Consultation	NPG	16.4 (Table)	These words do not occur in Table 2 of CRC3A/ Not exact extract from CRC3A.	Agree - we are consulting on changes to CRC3A alongside this consultation.	Closed
162	Informal Consultation	NPG	16.4 (Table)	Doesn't sound right – change to 'Timetable for assessment and notification'?	Agree - change made	Closed
163	Informal Consultation	NPG	16.4 (Table)	Change 'After 31 October 2016' to 'Between 31 October 2016 and 28 February 2017'	Agree - change made	Closed
164	Informal Consultation	NPG	16.4 (Table)	Change 'Authority' to 'the Authority' and licensee to 'the licensee'	Agree - change made	Closed
165	Informal Consultation	NPG	16.4 (Table)	Change 'After 30 September 2017' to 'By DD/MM/YY'	Disagree. Correct date now inserted.	Closed
166	Informal Consultation	NPG	16.4 (Table)	Change '30 November 2017' to 'By 30 November 2017'	Section deleted	Closed
167	Informal Consultation	NPG	16.4 (Table)	Should this also mention the Q&A process following the performance assessment submission? Perhaps a brief paragraph could also be added describing this.	Agree - change made	Closed
168	Informal Consultation	NPG	16.4 (Table)	I couldn't find this defined here, but initial capitals suggests it should be. The defined term is 'NOMs Network Outouts Gap', (but that definition then doesn't work as it does not appear in 2012 RIGs).	Agree - change made	Closed
169	Informal Consultation	UKPN	16.4 (Table)	As chapter 15 - Performance Assessment	Agree - change made	Closed
170	Informal Consultation	UKPN	16.4 (Table)	Too broad – must be submitted DPCR5 RRP information	Disagree. This should also include information submitted in the PAS.	Closed
171	Informal Consultation	WPD	16.5	Authority does not specify the contents.	Agree - change made	Closed
172	Informal Consultation	ENWL, SPEN	16.9	Helpful to refer to the supplementary question process here/Should be updated to include reference to ongoing discussion between the Authority and Licensee during the Performance Assessment to allow the Authority to obtain further information and clarifications as required.	Agree - change made	Closed
174	Informal Consultation	WPD	16.9	This implies that the Performance Assessment is for the assessment of the methodology rather than for the subject covered by the methodologies	Agree - change made	Closed
175	Informal Consultation	SPEN	16.13	This should be 16.12	Checked references	Closed
176	Informal Consultation	ENWL	16.15	Para reference -16.68	Agree - change made	Closed
177	Informal Consultation	SSE	16.15	Conscious that any re-calculation as a result of insufficiently robust or consistent data is limited to the Network Outputs Gap. Does this cover off any knock-on effect on re-openers in the event of a double count issue?	Agree - change made	Closed
178	Informal Consultation	NPG	16.18	Elsewhere this is capitalised and a defined term.	Agree - change made	Closed
179	Informal Consultation	UKPN	16.30	Best place is after 16.33 where it is relevant and specific	No change. Propose to keep upfront in the chapter.	Closed
180	Informal Consultation	NPG	16.36	Not exactly reproduced for CRC 3A	Agree - we are consulting on changes to CRC3A alongside this consultation.	Closed
181	Informal Consultation	NPG	16.36 (Table)	Change name of NOMs methodology to be consistent with new title.	Agree - change made	Closed
182	Informal Consultation	NPG	16.37	In Glossary - IQI Incentive Rate - is defined in the singular (which is correct I think).	Agree - change made	Closed
183	Informal Consultation	ENWL	16.42	Cross-reference to the post double-count allowance adjustment	has been covered by drafting	Closed
184	Informal Consultation	ENWL	16.44	Cross-reference to the post double-count allowance adjustment	has been covered by drafting	Closed
185	Informal Consultation	ENWL	16.48	After this paragraph need to bring in an additional adjustment for new flooding allowances for SSE	Agree - change made	Closed
186	Informal Consultation	NPG	16.54	In the Glossary the defined term is 'DPCR5 HVP'.	Agree - change made	Closed
187	Informal Consultation	WPD	16.56	HVP Failure to Deliver Outputs Adjustment is a defined term in the glossary and should therefore be capitalised everywhere used in the Handbook	This is not a defined term. Propose to use as lower-case throughout the document.	Closed
188	Informal Consultation	ENWL	16.58	Should the Authority determine the revised RIREV by September rather than November	Checked references	Closed
189	Informal Consultation	UKPN	16.61	Repeated word 'Adjustment'	Agree - change made	Closed
190	Informal Consultation	WPD	16.61	Should be "DPCR5 NOMS Revenue Adjustment" – check throughout document.	Superseded by change to drafting - no longer a defined term	Closed
191	Informal Consultation	NPG	16.61	This reads as if the DPCR5 NOMs Revenue Adjustment can be found directly in Annex A1 – but I don't think it can. The step which previously existed in the handbook to cover time value of money adjustments required in order to convert the annual values to one revenue adjustment has been removed (and not shown in Ofgem's tracked changes). The previous paragraph was as follows: 16.56 The Authority will then: (a) multiply the values referred to in paragraph 16.55 by the DPCR5 IQI Incentive Rate for the licensee multiplied by a factor of 1.025; (b) apply DPCR5 Time Value of Money Adjustments to the values calculated under subparagraph (a) to put them on a common 2015/16 time value basis and then total the values for the whole of DPCR5; and (c) multiply the total value calculated under subparagraph (b) by minus 1, so that it is a negative value. Part (a) is now covered within the methodologies in Annex A1, but I can't see anything which covers parts (b) or (c), so I think this is an omission and the section needs re-wording to incorporate these steps. Rather than multiplying by minus 1 – it would be better to say 'expressed as a negative value'. (I can't follow Annex C1 well enough in the time available to work out whether the value of the outputs gap calculated via the steps in the Annex will be positive or negative.)	Agree - change made	Closed
192	Informal Consultation	ENWL	16.62	Para reference -16.69	Checked references	Closed
193	Informal Consultation	ENWL	16.62	Para reference -16.73	Checked references	Closed
194	Informal Consultation	ENWL	16.62	Unless the Authority considers that the licensee has not provided sufficiently robust and consistent data.....	Agree - change made	Closed
195	Informal Consultation	ENWL	16.62	Incorrect reference	Checked references	Closed
196	Informal Consultation	NPG	16.62	This is a defined term, but the definition is flawed.	Agree - change made	Closed
197	Informal Consultation	NPG	16.62	Why 'revised'? This comment also applies below.	Agree - change made	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
198	Informal Consultation	NPG	16.63	Is this x-reference correct? It seems to be when the Authority says there is no gap.	Checked references	Closed
199	Informal Consultation	NPG	16.63	Is the past tense correct here?	Text checked.	Closed
200	Informal Consultation	NPG	16.63	I'm not sure what this is. I could not find this defined term. I'm not sure what assessment by the Authority you are trying to capture here.	Agree - change made	Closed
201	Informal Consultation	SSE	16.63	'require' in row 3 should read 'requires'.	Agree - change made	Closed
202	Informal Consultation	UKPN	16.63	Odd place to put this does not read well – should follow 16.72 and describe 2018 process	Consider current structure is clear and no change required.	Closed
203	Informal Consultation	NPG	16.64	Do you mean 'may' rather than will?	Agree - change made	Closed
204	Informal Consultation	NPG	16.65	These paragraphs do not set out anything about how the Authority will recalculate the Network Outputs Gap	Correct reference inserted.	Closed
205	Informal Consultation	NPG	16.65	I could not find this term in the Glossary because only 'NOMs Network Output Gap' is defined there and that definition then fails because the 2012 Glossary (on which it depends) does not use the same term.	Agree - change made	Closed
206	Informal Consultation	UKPN	16.65	Hardcoded paragraph refs need updating – until clarity on the correct cross reference is provided this section is unclear as loops around	Checked references	Closed
207	Informal Consultation	UKPN	16.65	Blank para numbering below to be corrected	Agree - change made	Closed
208	Informal Consultation	ENWL	16.67	Para reference -16.66	Checked references	Closed
209	Informal Consultation	ENWL	16.70	Should the Authority determine the revised RIREV by September rather than November	Existing text correct. Adjustments determined by September for the purpose of determining RIREV in November.	Closed
210	Informal Consultation	NPG	16.71	I could not find this term in the Glossary because only 'NOMs Network Output Gap' is defined there and that definition then fails because the 2012 Glossary (on which it depends) does not use the same term.	Agree - change made	Closed
211	Informal Consultation	ENWL	16.71	Should the Authority determine the revised RIREV by September rather than November	Existing text correct. Adjustments determined by September for the purpose of determining RIREV in November.	Closed
212	Informal Consultation	NPG	Annex A1, 1.1(i)	The definition sequence doesn't work because 2012 RIGs don't use the term NOMs Network Outputs Gap, but the Glossary to this document assumes the RIGs use this term.	Agree - change made	Closed
213	Informal Consultation	NPG	Annex A1, 1.2	Does this work? In the Glossary from 2012 (which this document refers back to), HI (for example) is not an output at all. It is a measure (strictly 'a framework for collating information'). So is it accurate drafting to say that the Agreed Network Outputs comprise a 'component' that is actually merely a framework for collating information?	Definitions have been reworked and agreed with the WG.	Closed
214	Informal Consultation	WPD	Annex A1, 1.3	The reference document numbers are specific to different sections of the handbook.	Agree - change made	Closed
215	Informal Consultation	NPG	Annex A1, 1.4	Initial capital letters suggests this is a defined term, but I couldn't find it.	glossary terms now added for Performance Assessment and third bullet amended to remove capitals	Closed
216	Informal Consultation	WPD	Annex A1, 1.5	Delete repetition - determine whether a NOMs Network Outputs Gap has arisen	Agree - change made	Closed
217	Informal Consultation	WPD	Annex A1, 1.6	Use consistent terminology with 1.15 (ii) - 'the delivery' of Agreed Network Outputs	Agree - change made	Closed
218	Informal Consultation	NPG	Annex A1, 1.6-1.7	Does this capture what you want? The first bullet is an assessment of whether the licensee has delivered the Agreed Network Outputs. I think the second should be a consideration of whether the Agreed Network Outputs need to be changed because of Material Changes. If so you then have 'Adjusted Network Outputs.' You then want to assess if the licensee has delivered 'Qualitatively Equivalent Network Outputs'. But your definition of that term in the Glossary does not make any reference to something that is broadly equivalent to the 'Agreed Network Outputs' or to the 'Adjusted Network Outputs', so I think the structure you have set out now fails.	Section has been significantly redrafted.	Closed
219	Informal Consultation	ENWL/SPEN	Annex A1, 1.7	Not clear what this means. Presumably Ofgem's intent is that the Licensee will get no credit for HVP outputs in this methodology?/ High Value Projects are outside the scope of NOMs and should be assessed independently. The impact of HVPs should be excluded from both the agreed and the delivered network outputs, this will ensure there is no double count between the close out areas.	This has been redrafted to clarify.	Closed
221	Informal Consultation	WPD	Annex A1, 1.9	Proportionality is covered in the next point 1.10. This point is about timings.	Agree - change made	Closed
222	Informal Consultation	NPG	Annex A1, 1.1	Brackets are inconsistent with title.	Agree - change made	Closed
223	Informal Consultation	NPG	Annex A1, 1.11(ii)	No need to use different language, and no need to mention licensee.	Agree - change made	Closed
224	Informal Consultation	ENWL/UKPN	Annex A1, 1.12	Para reference - 16.7?/ We think this should be 16.7	Checked references	Closed
225	Informal Consultation	WPD	Annex A1, 1.12	Reference - 16.10?	Checked references	Closed
226	Informal Consultation	NPG	Annex A1, 1.13	My suggested wording may not fit your scheme. I was trying to provide for the situation where Material Changes have not altered the Agreed Network Outputs, so these remain the basis of the test. You may have been drafting on the assumption that a licensee that has delivered the 'Agreed Network Outputs' where no Material Changes have clouded the issue, will by definition, have delivered Qualitatively Equivalent Network Outputs. That could work but it requires the definition of Qualitatively Equivalent Network Outputs to work and I'm not sure it does. (See comments on that in the Glossary).	Section and definitions have been significantly redrafted.	Closed
227	Informal Consultation	NPG	Annex A1, 1.14	This overall assessment is needed to inform the steps undertaken at paragraph 1.58-1.62 (the assessment across all three components)	Section has been significantly redrafted.	Closed
228	Informal Consultation	UKPN	Annex A1, 1.14	Does this need to say 'and an assessment of the delivery of the combined outputs'?	Section has been significantly redrafted.	Closed
229	Informal Consultation	NPG	Annex A1, 1.15(ii)	As per previous comments, this assessment is necessary to inform the steps set out at paragraphs 1.58 – 1.62 (the assessment across all three components)	Section has been significantly redrafted.	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
230	Informal Consultation	WPD	Annex A1, 1.16	These paragraphs also cover the initial high level analysis. Would this section fit better after para 1.6 as a general guide to the assessment for each component?	Section has been significantly redrafted.	Closed
231	Informal Consultation	ENWL	Annex A1, 1.16(i)	Para reference -1.32	Checked references	Closed
232	Informal Consultation	ENWL	Annex A1, 1.16(ii)	Para reference -1.33	Checked references	Closed
233	Informal Consultation	ENWL	Annex A1, 1.16(iii)	Para reference -1.57	Checked references	Closed
234	Informal Consultation	NPG	Annex A1, 1.17	The way you have defined this does not have 'individual components'. Once you delete the words ' individual components' then the remain text repeats sub-bullet (i) so can be deleted.	Section has been significantly redrafted.	Closed
235	Informal Consultation	NPG	Annex A1, 1.17	These changes are also necessary for consistency with paragraphs 1.58 – 1.62, which should also be cross referenced at step 4 (since they set out how step 4 should be undertaken)	Section has been significantly redrafted.	Closed
236	Informal Consultation	SPEN	Annex A1, 1.17	As drafted this paragraph indicates the gap calculation to be a prescriptive summing of the values from each component. During development it was agreed that the values from each component should provide a maximum value which the Authority can adjust based on their view of overall delivery. This is reflected in the drafting of paragraphs 1.68 to 1.70. This paragraph should be updated to be consistent with this.	Section has been significantly redrafted.	Closed
237	Informal Consultation	UKPN	Annex A1, 1.17(ii)	As originally worded 1.17 required all tests to be passed for an “in the round” decision of no gap. We believe this is not the policy and the three options are: i) pass each one individually ii) pass the three in the round iii) gap exists Have reworded accordingly	Section has been significantly redrafted.	Closed
238	Informal Consultation	ENWL	Annex A1, 1.18	Explicitly state that if the Licensee has delivered Qualitively Equivalent Network Outputs then no adjustment is required	Section has been significantly redrafted.	Closed
239	Informal Consultation	ENWL	Annex A1, 1.18	Para reference -1.68	References checked.	Closed
240	Informal Consultation	ENWL	Annex A1, 1.18	Para reference -1.7	References checked.	Closed
241	Informal Consultation	NPG	Annex A1, 1.19	As defined it is hard to see how there could be a HI component of Qualitatively Equivalent Network Outputs./ There could however be an HI contribution to whether the licensee has delivered Qualitatively Equivalent Network Outputs, so this could say: ‘The Authority will identify the contribution of HI towards whether or not the licensee has delivered Qualitatively Equivalent Network Outputs’	Section has been significantly redrafted.	Closed
243	Informal Consultation	UKPN	Annex A1, 1.19	Does this need an “Introduction” heading? Same then applies to LI and fault rates sections	Consider drafting is clear.	Closed
244	Informal Consultation	BG	Annex A1, 1.19(ii)	Should reference the best interests of consumers as per paragraph 2.47 of Final Proposals and 2.55 of NADPR RIGs	In FPs the assessment of whether or not actions were in the best interest of customers is set in the context of considerations relating to long-term asset stewardship and the level of risk originally funded by customers. We consider that our current drafting reflects this intent.	Closed
245	Informal Consultation	NPG	Annex A1, 1.19(ii)	This term is defined as a set of price control arrangements. Here you are using to mean a period (i.e. from 1 April 2010 to 31 March 2015).	References to DPCR5 and DPCR5 period have all been clarified.	Closed
246	Informal Consultation	NPG	Annex A1, 1.20	The defined term is not specific to His.	Consider no change required.	Closed
247	Informal Consultation	NPG	Annex A1, 1.20	This is defined as a framework for measuring. Does that work ok or do you need something that captures what was done?	Consider current references to NOMs as metrics work.	Closed
249	Informal Consultation	UKPN	Annex A1, 1.20(ii)	This is defined as delivered – is this compared to the HI Target Delta	Agree - change made	Closed
250	Informal Consultation	NPG	Annex A1, 1.20(iii)	What about afterwards, e.g. in a bilateral?	Agree - change made	Closed
251	Informal Consultation	NPG	Annex A1, 1.22	Surely 1.20 is long before a Performance Assessment.	Agree - change made	Closed
252	Informal Consultation	SPEN	Annex A1, 1.22	This is the Initial High Level Analysis stage so use of the term Performance Assessment is not appropriate.	Agree - change made	Closed
253	Informal Consultation	WPD	Annex A1, 1.22	Para 1.20 refers to High Level Analysis	Agree - change made	Closed
254	Informal Consultation	NPG	Annex A1, 1.23	Is this x-reference correct? The HI Target Delta isn't described in that sub-paragraph.	Text now deleted.	Closed
255	Informal Consultation	NPG	Annex A1, 1.23	Should this be 1.20(ii) i.e. in relation to material changes?	Text now deleted.	Closed
256	Informal Consultation	UKPN	Annex A1, 1.23	Would this sit better at the end of 1.20?	Text now deleted.	Closed
257	Informal Consultation	WPD	Annex A1, 1.23	Need to be more specific that the qualitative review can adjust the quantitative analysis.	Text now deleted.	Closed
258	Informal Consultation	WPD	Annex A1, 1.23	Terminology changes here; more helpful to use terminology in 1.20.	Text now deleted.	Closed
259	Informal Consultation	ENWL	Annex A1, 1.24	This list of what the Authority will assess as part of its HI Performance Assessment is not very clear. Ofgem should clarifying intent.	Section significantly redrafted.	Closed
260	Informal Consultation	UKPN	Annex A1, 1.24	This needs a non hard coded cross ref	References checked.	Closed
261	Informal Consultation	UKPN	Annex A1, 1.24	Reference 1.20 - if accept point above	References checked.	Closed
262	Informal Consultation	ENWL	Annex A1, 1.24(i)	Suggest that if this test is met then it is explicitly stated that the HI component of Qualitatively Equivalent Network Outputs has been delivered and, that in respect of this component, no adjustment is required	Text added to clarify that Authority will notify licensee and consult on its Preliminary View.	Closed
263	Informal Consultation	NPG	Annex A1, 1.24(i)	I don't see how paragraph 1.23 can have 'a result.' What does that mean?	Section significantly redrafted.	Closed
264	Informal Consultation	WPD	Annex A1, 1.25	Replace term 'will' with 'may'.	Agree - change made	Closed
265	Informal Consultation	NPG	Annex A1, 1.25(iii)	Why only the qualitative that is relevant to the quantitative?	Agree - change made	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
266	Informal Consultation	NPG	Annex A1, 1.27(i)	Adjusted Network Outputs - I don't see this defined in the Appendix 1 Glossary, although it is in the 2012 RIGs. But that defined term is an objective test. i.e. it is the Agreed Network Outputs adjusted for Material Changes. I think what you want here is a mechanism where the licensee proposes what it thinks should be the revised HI component of the Adjusted Network Outputs; the Authority then considers this proposal and either agrees it, or substitutes its own. Then and only then, do we have the final view of what constitutes the HI component of Adjusted Network Outputs. I don't think you have drafted something that achieves this. You might spell this out more fully if that is what you meant.	Section has been significantly redrafted.	Closed
267	Informal Consultation	NPG	Annex A1, 1.27(ii)	Again I think you mean not proposing a change rather than rebasing. Your wording suggests that the licensee's decision is determinative with respect to this defined term.	Section has been significantly redrafted.	Closed
268	Informal Consultation	NPG	Annex A1, 1.27(ii)	As a matter of drafting logic. Surely the HI target delta will represent (the HI component of) the Agreed Network Outputs. The issue is whether it should be allowed to stand.	Section has been significantly redrafted.	Closed
269	Informal Consultation	WPD	Annex A1, 1.27(ii)	This point is unclear. By not rebasing outputs, the outputs remain the same as the HI Target Delta based upon the Agreed Network Outputs. No justification is required for this to be true.	Section has been significantly redrafted.	Closed
270	Informal Consultation	NPG	Annex A1, 1.27(iii-iv)	Could this be simplified into a single step that the Authority may rebase and justify its action if it doesn't agree with (i) or (ii) This would also solve the problem that the Authority can only do one of the actions in the list, but (iv) assumes (iii) has already happened since it talks about additional rebasing.	Section has been significantly redrafted.	Closed
271	Informal Consultation	SPEN	Annex A1, 1.28	As this paragraph refers back to the rebasing of network outputs in para 1.27 (i) and para 1.27 (ii) we don't believe that use of the term 'Agreed Network Outputs' is correct. We think this step is assessing whether the Adjusted Network Outputs are reasonable or whether the reasoning for not adjusting is appropriate. The para should be redrafted to reflect this.	Section has been significantly redrafted.	Closed
272	Informal Consultation	NPG	Annex A1, 1.28(i)	That is not the question at issue in these paragraphs i.e. that the licensee has not delivered Agreed Network Outputs.	Section has been significantly redrafted.	Closed
273	Informal Consultation	NPG	Annex A1, 1.28(ii)	HI Adjusted Network Outputs - Do you mean this to be a defined term?	Reference removed.	Closed
274	Informal Consultation	WPD	Annex A1, 1.28(ii)	The logic is confused. Rebasing only applies to 1.28 (ii). Why is rebasing required where the licensee has not delivered its Agreed Outputs? A different structure to the narrative is used in LIs (1.42), which works better.	Section has been significantly redrafted.	Closed
275	Informal Consultation	BG	Annex A1, 1.30	This section should include the other criteria set out in September: How well have the movements in the material changes log been explained and justified? (as per criteria 1 of September consultation) Have any significant HI band reductions by the DNO for particular asset categories and overall been adequately explained (ie through the material change log or other explanations) (as per criteria 2 of September consultation) Has asset health deteriorated significantly in asset categories which have been deprioritised by the DNO? Is this deterioration beyond what was forecast at DPCR5? (as per criteria 4 of September consultation) Where the asset health risk delta is worse than that assumed at DPCR5, why haven't interventions or further interventions been undertaken to address this? (as per criteria 6 of September consultation)	We consider that our current drafting enables us to take these criteria into account when assessing licensee performance.	Closed
276	Informal Consultation	NPG	Annex A1, 1.30(i)	Is it a programme of work <u>and</u> Interventions or just the latter?	Text redrafted to clarify.	Closed
277	Informal Consultation	NPG	Annex A1, 1.30(i)	I don't think 'quantitatively equivalent' is the right phrase. Do you mean 'broadly equivalent'?	Section has been significantly redrafted.	Closed
278	Informal Consultation	BG	Annex A1, 1.30(ii)	Should reference the best interests of consumers as per criteria 3 of September consultation and consistent with Final Proposals	See comment above.	Closed
279	Informal Consultation	NPG	Annex A1, 1.30(ii)	I think you mean the licensee is able to demonstrate that its asset management decisions represented effective stewardship.	Agree - change made	Closed
280	Informal Consultation	UKPN	Annex A1, 1.31	If this is purely for the purposes of valuing the gap then this should say so. Valuation separate so is this necessary	Text deleted.	Closed
281	Informal Consultation	WPD	Annex A1, 1.31	Need an additional step/sentence in this para to get to a result which is then used and referred to in para 1.32.	Text deleted.	Closed
282	Informal Consultation	UKPN	Annex A1, 1.32	As we understand it, there is no need to quantitatively assess the qualitative adjustment in 1.31 to test it against 1.19 (i) as 1.19(ii) would be passed. This needs rewording to take this into account	Section has been significantly redrafted.	Closed
283	Informal Consultation	WPD	Annex A1, 1.32(i)	See prev comment - need to calculate this result somewhere.	Consider current draft provides sufficient clarity.	Closed
284	Informal Consultation	NPG	Annex A1, 1.33	See our comments on para 1.19 re: Qualitatively Equivalent Network Outputs.	Section has been significantly redrafted.	Closed
285	Informal Consultation	BG	Annex A1, 1.33 (iii)	Should reference the best interests of consumers as per paragraph 2.47 of Final Proposals and 2.55 of NADPR RIGs	See comment above.	Closed
286	Informal Consultation	NPG	Annex A1, 1.33(i)	Is 'LI Band Profile Target' meant to be a defined term?	Agree - change made	Closed
287	Informal Consultation	NPG	Annex A1, 1.33(ii)	Is 'LI Agreed Network Outputs' meant to be a defined term?	Agree - change made	Closed
288	Informal Consultation	NPG	Annex A1, 1.33(ii)	Is 'LI Adjusted Network Outputs' meant to be a defined term?	Agree - change made	Closed
289	Informal Consultation	WPD	Annex A1, 1.33(ii)	Add 'where relevant' to the end of the sentence.	Agree - change made	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
290	Informal Consultation	NPG	Annex A1, 1.33(iii)	Equivalent Network Outputs' seems to be a new and undefined term.	Terms clarified throughout.	Closed
291	Informal Consultation	NPG	Annex A1, 1.34	The wording here does not mirror 1.20 for HI. Any reason?	Section has been significantly redrafted.	Closed
292	Informal Consultation	NPG	Annex A1, 1.34(i)	Is 'Agreed Network Outputs with Interventions' better as a defined term – reference to the document or cell in a spreadsheet.	Terms clarified throughout.	Closed
293	Informal Consultation	NPG	Annex A1, 1.34(iii)	See previous comments on this. You have defined DPCR5 as a set of price control arrangements.	See comment above.	Closed
294	Informal Consultation	SPEN	Annex A1, 1.34(iii)	This section states that a high level analysis of Material Changes will be undertaken as part of the LI Initial High Level Assessment. This type of analysis can be particularly complex due to network specifics requiring background information when interventions result in both demand and capacity being transferred between Demand Groups. We would welcome the opportunity to provide support with this assessment.	We welcome views and support from stakeholders throughout the assessment process.	Closed
295	Informal Consultation	NPG	Annex A1, 1.35(ii)	See previous comments on this. You have defined DPCR5 as a set of price control arrangements.	See comment above.	Closed
296	Informal Consultation	ENWL	Annex A1, 1.36	Need to explicitly state here that changes in demand are not to be taken into account here as Material Changes	Agree - change made	Closed
297	Informal Consultation	NPG	Annex A1, 1.36	Can Material Changes affect Agreed Network Outputs (as these terms are defined)? I don't think they can.	Section has been significantly redrafted.	Closed
298	Informal Consultation	NPG	Annex A1, 1.36	What is use of the word 'magnitude' meant to capture? Volume cost or physical size?	Section has been significantly redrafted.	Closed
299	Informal Consultation	NPG	Annex A1, 1.36(i)	Do you mean the licensee proposes this?	Section has been significantly redrafted.	Closed
300	Informal Consultation	NPG	Annex A1, 1.36(i)	Earlier you said 'magnitude' rather than 'level'.	Section has been significantly redrafted.	Closed
301	Informal Consultation	NPG	Annex A1, 1.37	The sequence raises a question. The Authority has carried out its Initial High Level Analysis. It now adjusts the result. What then happens with that adjusted result? Does this go into the Assessment in 1.39?	Section has been significantly redrafted.	Closed
302	Informal Consultation	UKPN	Annex A1, 1.37	The challenge here is that the LI profiles are the result of fact unless the declared demand or capacity are being changed as a result of a direction – 1.33 has sufficient qualitative assessment to render this unnecessary 1.37 not referred to in 1.38 anyway... Not used in valuation either	Text deleted.	Closed
303	Informal Consultation	WPD	Annex A1, 1.37	Should this also reference the quantitative LI Risks Points analysis in 1.34 (ii)	Text deleted.	Closed
304	Informal Consultation	WPD	Annex A1, 1.37	Need an additional step/sentence in this para to get to a result which is then used and referred to in para 1.38.	Consider current draft provides sufficient clarity.	Closed
305	Informal Consultation	ENWL	Annex A1, 1.38(i)	What does this mean? Surely in this circumstance it is the 'sensible level of risk' that the Authority determined in FP?	Section has been significantly redrafted.	Closed
306	Informal Consultation	WPD	Annex A1, 1.38(i)	There is more than one test in 1.33 and therefore should reference 'tests' and 'results'	Section has been significantly redrafted.	Closed
307	Informal Consultation	NPG	Annex A1, 1.39(ii)	Why only that which is relevant to the quantitative element.	Section has been significantly redrafted.	Closed
308	Informal Consultation	NPG	Annex A1, 1.41	If it's 'Target' in the singular, is it right that that Target is described as 'a set'. Is there more than one?	Section has been significantly redrafted.	Closed
309	Informal Consultation	UKPN	Annex A1, 1.41	Target deleted as the target must be equivalent	Section has been significantly redrafted.	Closed
310	Informal Consultation	NPG	Annex A1, 1.41(i)	See comments on 1.27(i) re: definition of Adjusted Network Outputs.	See comment above.	Closed
311	Informal Consultation	WPD	Annex A1, 1.41(i)	This point 'submitted as part of its Performance Assessment Submission' is made in HIs. It is required here because prior to this there in no mention of Adjusted Network Outputs.	Section has been significantly redrafted.	Closed
312	Informal Consultation	ENWL	Annex A1, 1.41(ii)	Suggest that if this test is met then it is explicitly stated that the LI component of Qualitatively Equivalent Network Outputs has been delivered and, that in respect of this component, no adjustment is required	Text added to clarify that Authority will notify licensee and consult on its Preliminary View.	Closed
313	Informal Consultation	WPD	Annex A1, 1.41(ii)	Unclear what 'reflects a sensible level of risk' means.	Section has been significantly redrafted.	Closed
314	Informal Consultation	NPG	Annex A1, 1.41(iii-iv)	Does this formulation work? The Authority can do only one of (i)-(iv) here. But (iv) surely presumes that (iii) has already occurred. This point is also true for HI. This could be solved by merging the two steps (in the way suggested for HI)	Section has been significantly redrafted.	Closed
315	Informal Consultation	SPEN	Annex A1, 1.42	Change reference from 'LI Adjusted Network Outputs' to 'LI component of the Adjusted Network Outputs'.	Agree - change made	Closed
316	Informal Consultation	SPEN	Annex A1, 1.43	Change reference from 'LI Adjusted Network Outputs' to 'LI component of the Adjusted Network Outputs'.	Agree - change made	Closed
317	Informal Consultation	BG	Annex A1, 1.44	This section should also include the other criteria set out in September: How well have the movements in the material changes log been explained and justified? (as per criteria 1 of September consultation) Have any significant LI band reductions for particular substations and overall been adequately explained (ie through the material change log or other explanations) (as per criteria 2 of September consultation) Has load risk increased significantly at substations which have been deprioritised by the DNO? Is this risk beyond what was forecast at DPCR5? (as per criteria 4 of September consultation) Where the LI profile is worse than that assumed at DPCR5, why haven't interventions or further interventions been undertaken to address this? (as per criteria 5 of September consultation)	See comment above.	Closed
318	Informal Consultation	NPG	Annex A1, 1.44(i)	I could not find this term - 'Actual LI Risk Points' - defined.	Agree - change made	Closed
319	Informal Consultation	SSE/SPEN	Annex A1, 1.44(i)	Delete 'was' from second line - wrong tense.	Agree - change made	Closed
320	Informal Consultation	BG	Annex A1, 1.44(ii)	Should reference the best interests of consumers as per criteria 3 of September consultation	See comment above.	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
321	Informal Consultation	NPG	Annex A1, 1.44(iii)	Do you mean that were raised in this - rather than 'have arisen through'?	Agree - change made	Closed
322	Informal Consultation	NPG	Annex A1, 1.45	Is it the licensee's comparison that is being adjusted?	Section has been significantly redrafted.	Closed
323	Informal Consultation	UKPN	Annex A1, 1.45	If this is purely for the purposes of valuing the gap then this should say so. Valuation separate so is this necessary	Text deleted.	Closed
324	Informal Consultation	WPD	Annex A1, 1.45	Need an additional step/sentence in this para to get to a result which is then used and referred to in para 1.46.	Consider current draft provides sufficient clarity.	Closed
325	Informal Consultation	ENWL	Annex A1, 1.45(i)	Para reference -1.33	References checked.	Closed
326	Informal Consultation	ENWL	Annex A1, 1.45(ii)	Para reference -1.33	References checked.	Closed
327	Informal Consultation	UKPN	Annex A1, 1.46	Please see comment against 1.31	References checked.	Closed
328	Informal Consultation	SPEN	Annex A1, 1.46(i)	Should refer to 1.33.	References checked.	Closed
329	Informal Consultation	SPEN	Annex A1, 1.46(ii)	Should refer to 1.33.	References checked.	Closed
330	Informal Consultation	SPEN	Annex A1, 1.47(i)	This section proposes a NOMs Materiality threshold value of 10% for fault rate. Our own analysis indicates that there has been a 6/12% (SPD/SPM) variation (one standard deviation) in fault rate over the past 14 years across all categories. This has been consistent over different time periods e.g. DPCR5. Therefore a threshold of between 12 to 24%, we would suggest 18%, would be more appropriate (two standard deviations) accounting for 95% of the population.	We consider that the materiality test we propose has been set at the right level and properly accounts for the additional uncertainty associated with factors such as annual weather fluctuations, third party damage, overloading, bird strikes and defects. DNOs submitted a set of forecasts for 'Damage Fault Rates' as part of their well justified business plans for DPCR5 which took into account the factors listed above and form the outputs against which they are to be assessed.	Closed
331	Informal Consultation	NPG	Annex A1, 1.47(ii)	Usual comment. This defined term - DPCR5 - is not what you mean here.	See comment above.	Closed
332	Informal Consultation	NPG	Annex A1, 1.48(iii)	You mean the DPCR5 period not the arrangements.	See comment above.	Closed
333	Informal Consultation	NPG	Annex A1, 1.48(iv)	Correct use of DPCR5 period but you should define and capitalise.	See comment above.	Closed
334	Informal Consultation	UKPN	Annex A1, 1.48(iv)	Consistent with LI and HI – otherwise excludes PAS	Agree - change made	Closed
335	Informal Consultation	SSE	Annex A1, 1.50	Insert the text 'DPCR5' between the words 'during' and 'against' in row 3. Also in row 3, a space is required between 'theDPCR5'.	Agree - change made	Closed
336	Informal Consultation	WPD	Annex A1, 1.50	Need an additional step/sentence in this para to get to a result which is then used and referred to in para 1.51.	Consider current draft provides sufficient clarity.	Closed
337	Informal Consultation	ENWL	Annex A1, 1.51(i)	Suggest that if this test is met then it is explicitly stated that the Fault Rate component of Qualitatively Equivalent Network Outputs has been delivered and, that in respect of this component, no adjustment is required	See comment above.	Closed
338	Informal Consultation	NPG	Annex A1, 1.51(i)	This wording works only where an adjustment has been made by the Authority pursuant to para 1.50. There is no 'result' if there is no adjustment.	Section has been significantly redrafted.	Closed
339	Informal Consultation	NPG	Annex A1, 1.52(ii)	Why must it be relevant to the quantitative assessment? Surely the point is that a qualitative review might show that the licensee had behaved sensibly even if that review shed no additional light on the quantitative assessment itself.	Agree - change made	Closed
340	Informal Consultation	NPG	Annex A1, 1.54	In paragraph 1.48(i) it was made clear this was only for non-HI assets. This needs to be consistent.	Agree - change made	Closed
341	Informal Consultation	NPG	Annex A1, 1.54	We didn't report fault rate points over DPCR5 as it has only just been invented	Text redrafted.	Closed
342	Informal Consultation	NPG	Annex A1, 1.54	Likewise we didn't forecast fault rate points over DPCR5 as it has only just been invented	Text redrafted.	Closed
343	Informal Consultation	WPD	Annex A1, 1.54	Replace "DPCR5" with "the DPCR5 period" across the document – definition of DPCR5 does not work here.	See comment above.	Closed
344	Informal Consultation	NPG	Annex A1, 1.55(i)	This isn't a defined term. Should be the forecast Fault Rate element of the Agreed Network Outputs	Text redrafted.	Closed
345	Informal Consultation	WPD	Annex A1, 1.55(ii)	Agreed Network Outputs have a wider definition - therefore replace with 'forecast Fault Rates'	Agree - change made	Closed
346	Informal Consultation	NPG	Annex A1, 1.55(iv)	This list [(i) to (iv)] is not complete. Ofgem must commit to recognising that if a DNO has behaved sensibly it will incur no penalty under the Fault Rate component. If it would have been silly to spend the money on replacing the assets, that should be sufficient to remove any risk of an adverse finding. Item (ii) in the list allows a DNO to make this case and obliges the Authority to 'consider' it. This is welcome, but the drafting should put it beyond doubt and a standalone paragraph that confirms this would be appreciated. It could for example say the following, as a separate paragraph immediately after this run of bullets: 'There will be no indication of a Fault Rates performance shortfall where the licensee's stewardship in respect of Fault Rates has been in the interests of consumers'	Reference to asset stewardship added.	Closed
347	Informal Consultation	UKPN	Annex A1, 1.56	Is this for the purpose of determining an adjustment as it otherwise turns a qualitative assessment into a quantitative one	Text deleted.	Closed
348	Informal Consultation	WPD	Annex A1, 1.56	Need an additional step/sentence in this para to get to a result which is then used and referred to in para 1.57.	Consider current draft provides sufficient clarity.	Closed
349	Informal Consultation	NPG	Annex A1, 1.57	General point. Sometimes you call it a 'component' and sometimes an 'element'. Better to use the same term if you mean the same thing. We have suggested that you call it a 'contribution' since that is what it offers within the overall assessment of whether Qualitatively Equivalent Network Outputs have been delivered	Agree - change made	Closed
350	Informal Consultation	UKPN	Annex A1, 1.57(i)	Please see comment against 1.31	See comment above.	Closed
351	Informal Consultation	SSE	Annex A1, 1.57(ii)	'meets' should read 'meet'.	Agree - change made	Closed
352	Informal Consultation	WPD	Annex A1, 1.58	Add 'and' to the end of the bullet as all have to be true for the licensee to pass.	Agree - change made	Closed
353	Informal Consultation	BG	Annex A1, 1.60(i)	Should reference the best interests of consumers as per paragraph 2.47 of Final Proposals and 2.55 of NADPR RIGs	See comment above.	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
354	Informal Consultation	NPG	Annex A1, 1.61	Para 1.61 is welcome but it is not complete because (a) it is expressed to be subject to para 1.60; and (b) it deals only with the situation where a licensee has delivered Qualitatively Equivalent Network Outputs. I think there are three situations where there should be no prospect of a clawback. These are (i) where the licensee has delivered the Agreed Network Outputs and there are no complications arising from Material Changes; (ii) where the licensee has delivered the Adjusted Network Outputs; and (iii) where the licensee has delivered Qualitatively Equivalent Network Outputs. Situation (iii) differs from situations (i) and (ii) because situation (iii) is where Ofgem considers that, whilst the licensee has not precisely met each of the three components (HI, LI and Fault Rates), it has nevertheless delivered something that is broadly equivalent with what was funded at the price control review when assessed in the round. However, there is a fourth situation, where a licensee should not be penalised and that is where it has not delivered (i), (ii), or (iii), but it has nevertheless acted in the interests of customers and the outcome was efficient. It is this fourth case – and only this one – that should properly be made subject to the tests in paragraph 1.60.	Section significantly redrafted.	Closed
355	Informal Consultation	WPD	Annex A1, 1.61	Can this last part - 'the Authority will consult on its Preliminary View in line with paragraph 16.10' be deleted? Seems to confuse the point.	Disagree. Need to clarify what happens where Authority does not think there is a Network Outputs Gap.	Closed
356	Informal Consultation	WPD	Annex A1, 1.61	Detail not required here.	Disagree. Need to clarify what happens where Authority does not think there is a Network Outputs Gap.	Closed
357	Informal Consultation	NPG	Annex A1, 1.62	Should this be in the Glossary at Appendix 1?	Disagree. Definitions and terms have been clarified.	Closed
358	Informal Consultation	SPEN	Annex A1, 1.63	This creates an inconsistency between the gap and the allowance as NOMs is a composite of a section of the EHV & 132kV General Reinforcement allowance and a section of the Asset Replacement allowance. However, we can understand using the Asset Replacement allowance as it is the most readily available value and is a greater contribution to NOMs than general reinforcement. Therefore the impact from the inconsistency should be minimal. During development of the methodology using actual expenditure to profile the gap was discussed. This approach would provide consistency with the approach for LRE and HVP reopeners and ensure the treatment of double counting between NOMs and LRE was fair and equitable. We believe that using actual expenditure is the most appropriate approach.	The existing Handbook drafting agreed at ED1 licence drafting already included provisions to profile reopeners based on actuals. We consider that profiling NOMs adjustments based on Asset Replacement is the most pragmatic approach.	Closed
359	Informal Consultation	WPD	Annex A1, 1.63	It does not make sense to profile LI Network Output Gap against asset replacement allowances.	We consider that this is the most pragmatic approach to take. This was discussed and agreed at WG.	Closed
360	Informal Consultation	NPG	Annex A1, 1.64	This doesn't work. Para 1.58 deals only with opposite situation. i.e. where there is no such gap.	Reference deleted.	Closed
361	Informal Consultation	WPD	Annex A1, 1.64	Confusing as the conclusion of 1.58 is there is no adjustment	Text redrafted.	Closed
362	Informal Consultation	ENWL	Annex A1, 1.64(i)	Cross reference this to relevant annex i.e Annex A2	References added.	Closed
363	Informal Consultation	SSE	Annex A1, 1.64(i)	To be consistent, reference to 'DPCR5 allowed unit cost (a)' in row 3 should be 'DPCR5 allowed unit cost (A)'. Also, it would be helpful if, at this point, it referenced 'A', as defined in Annex A2, 1.6, '.	Agree - change made	Closed
364	Informal Consultation	ENWL	Annex A1, 1.64(ii)	Original wording could be read as multiply by outturn and then taking this result, multiply once again by allowed. Wording for Fault Rates much better.	Text redrafted.	Closed
365	Informal Consultation	NPG	Annex A1, 1.64(ii)	The volume of work should only be multiplied by a unit cost once. I'm not sure this reads like that.	Text redrafted.	Closed
366	Informal Consultation	SPEN/WPD/UKPN	Annex A1, 1.64(ii)	Replace 'multiplied again' with 'separately' and 'it' with 'the volumes of work' 'Multiplied again' suggests a compound multiplication/ 1.66ii uses word "separately" and this should be in here too for a correct calc	Text redrafted.	Closed
367	Informal Consultation	SSE	Annex A1, 1.64(ii)	To aid understanding / reading, suggest this is amended to read 'for each HI Asset Category, the volume of work, from step (i) above, is multiplied by the licensee's DPCR5 outturn unit cost (as specified in Annex A2) and separately by the licensee's DPCR5 allowed unit cost ...'. This is consistent with the text used in para 1.66 (ii).	Text redrafted.	Closed
368	Informal Consultation	UKPN	Annex A1, 1.64(ii)	Is this the value in 1.31?	Text redrafted.	Closed
371	Informal Consultation	WPD	Annex A1, 1.64(iii)	Plural because this relates to all HI asset categories.	Text redrafted.	Closed
372	Informal Consultation	SSE	Annex A1, 1.64(v)	Also applicable to 1.65 (iv) and 1.66 (iv). Understand these calculations to be scaling the total monetary gap to reflect the tolerances (5%, 5% and 10% respectively) that apply. However, it would be worth including explanatory text to this effect.	Consider existing text is sufficiently clear.	Closed
373	Informal Consultation	UKPN	Annex A1, 1.64(vi)	Pre application of incentive rate this needs to be limited to the allowed revenues. Also when does the incentive rate get applied?	This text is for application of the penalty rate. Consider current wording works and no change needed.	Closed
374	Informal Consultation	NPG	Annex A1, 1.65	As before. This paragraph is the one that says there was no such gap so the drafting is not apt.	Text redrafted.	Closed
375	Informal Consultation	WPD	Annex A1, 1.65	Confusing as the conclusion of 1.58 is there is no adjustment	Text redrafted.	Closed
376	Informal Consultation	NPG	Annex A1, 1.65(iii)	Actual LI Risk Points - this is an important term. Does it need precise definition?	Text redrafted.	Closed
377	Informal Consultation	UKPN	Annex A1, 1.65(iii)	Is this the value from 1.45?	No. See references in paragraph.	Closed
378	Informal Consultation	SPEN	Annex A1, 1.65(v)	Replace reference to 'HI component' with reference to 'LI component'	Agree - change made	Closed
379	Informal Consultation	SSE	Annex A1, 1.65(v)	Reference to 'HI' in row 3 should be 'LI'.	Agree - change made	Closed
380	Informal Consultation	UKPN	Annex A1, 1.65(v)	Pre application of incentive rate this needs to be limited to the allowed revenues. Also when does the incentive rate get applied?	This text is for application of the penalty rate. Consider current wording works and no change needed.	Closed
381	Informal Consultation	WPD	Annex A1, 1.65(v)	LI not HI here.	Agree - change made	Closed
382	Informal Consultation	NPG	Annex A1, 1.66	Again, this drafting doesn't work as that para deals with the opposite scenario.	Text redrafted.	Closed
383	Informal Consultation	WPD	Annex A1, 1.66	Confusing as the conclusion of 1.58 is there is no adjustment	Text redrafted.	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
384	Informal Consultation	NPG	Annex A1, 1.66(i)	Remove references to 'already' covered and change 'target' to 'forecast'.	Agree - change made	Closed
385	Informal Consultation	UKPN	Annex A1, 1.66(i)	Is this the value from 1.56?	No. See references in paragraph.	Closed
386	Informal Consultation	NPG	Annex A1, 1.66(ii)	Step (i) has produced a volume of faults not a volume of asset replacement work to avoid a fault as per Annex A2, Section 3, para 3.8. That volume of asset replacement work is then multiplied by the various unit costs	Text redrafted.	Closed
387	Informal Consultation	NPG	Annex A1, 1.66(ii)	Do all these terms need precise definition to avoid ambiguity? (This point has general application to all the outputs.)	Definitions have been reworked and agreed with the WG.	Closed
388	Informal Consultation	SPEN	Annex A1, 1.66(ii)	There is an additional step required between sub para (i) and sub para (ii) to covert the fault volumes calculated in (i) into the volumes of work required in (ii).	Text redrafted.	Closed
389	Informal Consultation	SSE	Annex A1, 1.66(ii)	Reference to 'the volume of work' in row 1 should be replaced with 'the number of faults'.	Text redrafted.	Closed
390	Informal Consultation	WPD	Annex A1, 1.66(ii)	*** IMPORTANT ***Step (ii) omits to apply the equivalent asset replacement volume assumed to be required to avoid a fault, as per Annex A2 para 3.8 Additional step included.	Agree - change made	Closed
391	Informal Consultation	NPG	Annex A1, 1.66(iii)	Do all these terms need precise definition to avoid ambiguity? (This point has general application to all the outputs.)	Text redrafted.	Closed
392	Informal Consultation	UKPN	Annex A1, 1.67	When does the incentive rate get applied?	DPCR5 Network Outputs Incentive Rate applied to each individual component of the NOMs Outputs Gap. This is then summed and profiled in last paragraph of A1. This value then feeds into Time Value of Money Adjustments in Chapter 16.	Closed
393	Informal Consultation	WPD	Annex A1, 1.67	This currently suggests all asset replacement activity. This should be limited to the asset replacement categories related to Fault Rate outputs.	Agree - change made	Closed
394	Informal Consultation	SPEN	Annex A1, 1.68	1.64 to 1.67 do not provide values for each year of DPCR5, only totals for DPCR5.	Agree - change made	Closed
395	Informal Consultation	ENWL	Annex A1, 1.69	It would be helpful to set out the circumstances under which the Authority might determine a lower value. We assume for example that at this satge the Authority will consider the trade-off between over delivery in one output category and under delivery in another	Section has been significantly redrafted.	Closed
396	Informal Consultation	WPD	Annex A1, 1.70	Reference - 1.15 - is this correct?	Checked references	Closed
397	Informal Consultation	NPG,WPD	Annex A2, 1.1	Should the reference be to 1.25(ii)?	Checked references	Closed
398	Informal Consultation	NPG	Annex A2, 1.2	This heading is rather different from the equivalent headline for LI. In that one it is implicit that this step is for the 'Agreed...' and 'Adjusted...'. Perhaps there are good reasons for the difference. If not I suggest you standardise.	Agree - change made	Closed
399	Informal Consultation	WPD	Annex A2, 1.2	Should this be the DPCR5 Agreed Network Outputs Workbooks? These are the original source of the targets.	Agree - change made	Closed
400	Informal Consultation	NPG	Annex A2, 1.3	Sometime we talk of 'removed' and sometimes 'delivered' Risk Points. Are they the same?	Agree - we will use 'delivered' throughout	Closed
401	Informal Consultation	SPEN	Annex A2, 1.3	Add reference to 'asset replacement and refurbishment'	No change. This is implicit in terms of what was reported in the network outputs reporting workbooks.	Closed
402	Informal Consultation	UKPN	Annex A2, 1.3	Needs to be qualified as definition includes Load	Agree - change made	Closed
403	Informal Consultation	ENWL/NPG/SPEN	Annex A2, 1.5	The section above only refers to (A). If Ofgem's intent is that (B) and (C) are run as sensitivities it should be stated here/ If above means Annex 2 then (B) & (C) aren't used/ Only one unit cost is referred to above - DPCR5 Allowed Unit Costs	This has been updated so the text in Annex A1 refers to Annex A2 and vice versa	Closed
406	Informal Consultation	UKPN	Annex A2, 1.5	Repeats, suggest finessing these two sentences into one	Agree - change made	Closed
408	Informal Consultation	UKPN	Annex A2, 1.5	Licensee's proposed asset replacement unit costs FPBQ unit costs - Doesn't make sense	Text replaced	Closed
409	Informal Consultation	NPG	Annex A2, 1.6	Are mapped into a single' - Do you mean 'combined to give a single...'	Agree - change made	Closed
410	Informal Consultation	SPEN	Annex A2, 1.6	Para on DPCR5 Outurn Unit Costs is only used in the HI Outputs gap assessment	Checked references	Closed
411	Informal Consultation	SPEN	Annex A2, 1.6	DPCR5 FBPAQ unit costs are not used.	Category C has now changed to Survery Unit Costs	Closed
412	Informal Consultation	SSE	Annex A2, 1.6	In calculation at end of para 1.6, reference to '((category a volumes' should be '(category A volumes'.	Agree - change made	Closed
413	Informal Consultation	UKPN	Annex A2, 1.6	Section rearranged to reflect unit costs and amalgamation separately	Text has been rearranged to improve the flow	Closed
414	Informal Consultation	UKPN	Annex A2, 1.6	is formula meant to be a sub part of 1.6?	Yes - text amended	Closed
415	Informal Consultation	NPG	Annex A2, 1.6(A)	Why quote marks on 'lower of'?	Agree - change made	Closed
416	Informal Consultation	NPG	Annex A2, 1.6(A)	Should FBPAQ submission be a defined term? (Next page refernces this in full).	Text has been removed. No need to define.	Closed
417	Informal Consultation	WPD/UKPN	Annex A2, 1.6(A)	Weighted for a given HI Asset Category using the licensee's FBPAQ submission - For volumes?/ This needs to specify which volumes are used. It should be either additions or disposals.	Agree - this should be disposals - change made	Closed
418	Informal Consultation	NPG	Annex A2, 1.6(B)	As before. You mean DPCR5 period not an arrangement.	Agree - change made throughout	Closed
419	Informal Consultation	NPG	Annex A2, 1.6(C)	Licence DPCR5 FBPAQ Unit Costs - More precision needed for this term. (Also should it not be 'in the licensee's FBPAQ submission').	Text has been removed.	Closed
420	Informal Consultation	WPD	Annex A2, 1.6(C)	Propose additional text to confirm that additions are used	Text has been removed.	Closed
421	Informal Consultation	NPG	Annex A2, 2.1	For HI you used 'steps'. Any reason to change?	We use stages overall and then steps within the stages.	Closed
422	Informal Consultation	NPG	Annex A2, 2.2	This heading suggests this step is for both the Agreed and the Adjusted, but when you read it, it just seems to cover Agreed. Surely that's wrong. Anyway should it not be 'the LI component of...' to be consistent with previous fomulations?	Text changed to Adjusted to reflect changes to A1	Closed
423	Informal Consultation	NPG	Annex A2, 2.2	Do you mean 'that is equal' rather than just 'equal'	Agree - change made	Closed
424	Informal Consultation	NPG	Annex A2, 2.2	You mean the DPCR5 period	Agree - change made throughout	Closed
425	Informal Consultation	UKPN	Annex A2, 2.2	Does that mean the Authority has already done it? I think it means the LI Agreed Network Outputs at the end of DPCR5	Agree - change made	Closed
426	Informal Consultation	NPG	Annex A2, 2.3(ii)	Voltage level totals of what?	Deleted text	Closed
427	Informal Consultation	NPG	Annex A2, 2.3(ii)	This is precisely the same term as in 2.5(ii), but I think they mean different things the first is with respect to Agreed Network Outputs, the second is with respect to Delivered Network Outputs.	Agree - reference changed to provide clarity.	Closed
428	Informal Consultation	SPEN	Annex A2, 2.3(ii)	Remove to make consistent with item 2.5 (ii).	Deleted text	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
429	Informal Consultation	WPD	Annex A2, 2.3(ii)	Need to reference the source of this data or calculation is the same as in 2.5 (i) and (ii)	Agree - change made	Closed
430	Informal Consultation	WPD	Annex A2, 2.4	This suggests a delta, where the target is an absolute.	Agree - change made	Closed
431	Informal Consultation	NPG	Annex A2, 2.5(ii)	This is precisely the same term as in 2.3(ii), but I think they mean different things the first is with respect to Agreed Network Outputs, the second is with respect to Delivered Network Outputs.	That is correct - references added for clarity.	Closed
433	Informal Consultation	NPG	Annex A2, 2.6	Why is there no stage 3 for HI but there is one for LI?	Agree - stage not required as repeat A1 - stage deleted	Closed
434	Informal Consultation	NPG/WPD	Annex A2, 2.6	Should you not say when each of these is the correct comparator, rather than just leaving it as a choice?/ Give paragraph references here for where these values are derived.	Agree - references added for clarity.	Closed
436	Informal Consultation	SPEN	Annex A2, 2.7	This section proposes sensitivity analysis of alternative LI weightings for licensees which have a different view of which LI Band an over-firm Demand Group should be assigned. The methodology should set out how the sensitivity analysis will be used to inform the outcome of the quantitative analysis.	Text has been removed	Closed
437	Informal Consultation	NPG	Annex A2, 2.7	Change language on LI Band Groups for over firm	Text has been removed	Closed
438	Informal Consultation	SPEN	Annex A2, 3.1	Blank numbering and should be removed.	Agree - change made	Closed
439	Informal Consultation	NPG	Annex A2, 3.2	Make clear this is limited to the non-HI Fault Rates?	Agree - text added to clarify	Closed
440	Informal Consultation	ENWL	Annex A2, 3.3	Given this comes before an explanation of what (D) is, would be best to refer to section 3.7	Agree - change made	Closed
441	Informal Consultation	NPG	Annex A2, 3.3(i)	Average DPCR5 Forecast Fault Rate - requires a precise definition.	Term deleted	Closed
442	Informal Consultation	NPG	Annex A2, 3.3(ii)	DPCR5 volume of assets - should this be qualified by 'in that Asset Category'.	No change. Already refers to each asset category	Closed
443	Informal Consultation	UKPN	Annex A2, 3.3(ii)	Shouldn't D be defined before it is used? This would mirror the proposed amendment to His.	Agree - change made	Closed
444	Informal Consultation	NPG	Annex A2, 3.3(iii)	In total or for that Asset Category?	No change - already says 'total' across 'all categories'	Closed
445	Informal Consultation	NPG	Annex A2, 3.4	This will result in two different numbers. How does the Authority decide which one to proceed with in its judgement of whether the output has been met and in its valuation of the gap.	Text changes to remove reference to with and without exceptional events. Therefore, only one number is derived.	Closed
446	Informal Consultation	NPG	Annex A2, 3.5(i)	Will provide DPCR5 forecast number of faults - surely not.	Should be 'delivered' rather than 'forecast'	Closed
447	Informal Consultation	ENWL	Annex A2, 3.5(ii)	Given this comes before an explanation of what (D) is, would be best to refer to section 3.7	Agree - change made	Closed
448	Informal Consultation	SSE	Annex A2, 3.5(ii)	It would be helpful if the reference to 'DPCR5 unit cost of an individual fault (D)' referred to 'as defined in para 3.7 below'.	Agree - change made	Closed
449	Informal Consultation	NPG	Annex A2, 3.7	This tells you what to do when this is available. But are there cases where it isn't? And if so what then is done?	No change. There would not be a case where a unit cost would not be available	Closed
450	Informal Consultation	NPG	Annex A2, 3.7	Do you mean 'combined to give'? I'm not sure, but I don't know what 'mapped' means.	Agree - change made	Closed
451	Informal Consultation	WPD	Annex A2, 3.7	The weighting here has to be based upon the volume of faults, because it is calculating a fault unit cost.	Agree - change made	Closed
452	Informal Consultation	NPG	Annex A2, 3.7(D)	We think this should refer to 'CV15 Unplanned incidents on power system voltage equipment – damage incidents requiring asset repair'	Agree - text added to clarify	Closed
453	Informal Consultation	SPEN	Annex A2, 3.8	We do not agree with the use of 'standard' asset replacement in the calculation of the fault rates output gap. This is due to the subjective assumption of the volume required to avoid a fault and implicitly assumes that each volume can be effectively targeted to avoid faults. However, if this approach is used we do not agree with the values proposed in this table. For cable assets we would propose that 'standard' repair lengths provide a useful guide and values of twice the 'standard' should be used, assuming this length would have avoided that fault occurrence. This would provide 30m for LV; 40m for HV and 100m for EHV and 132kV. For overhead line suggest using average span lengths which based on our network would be 40m for LV; and 75m for HV and EHV.	We set out our reasons for a using standard asset replacement in the Decision document. However, we accept that the proposed revised lengths are reasonable and have made these changes.	Closed
454	Informal Consultation	ENWL	Annex B, 1.3	Treatment of n-2 is absent in this methodology	Updated methodology and PAS, N-2 will be assessed as part of the primary reinforcement	Closed
455	Informal Consultation	WPD	Annex B, 1.4	actual expenditure' should be 'Load Related Actual Incurred Expenditure'	Agree - change made	Closed
456	Informal Consultation	SSE	Annex B, 1.6	The final row refers to 'paragraph 15.7'. It might be clearer to reference 'paragraph 15.7 of Chapter 15' given the size of the Handbook. This suggestion would apply throughout the document where references are made to paragraphs outside the chapter or annex.	Agree - reference added	Closed
457	Informal Consultation	WPD	Annex B, 1.8	Definition - should refer to DPCR5 Load Related Re-Opener	Agree - change made	Closed
458	Informal Consultation	NPG	Annex B, 1.9	Should this not be part of step 1 (probably part of, or just after, the final paragraph)?	Agree - change made	Closed
459	Informal Consultation	NPG	Annex B, 1.1	The term 'load related expenditure' should be used in full, and not acronymised	Agree - change made	Closed
460	Informal Consultation	ENWL	Annex B, 1.10	Para reference -15.9	Agree - change made	Closed
461	Informal Consultation	UKPN	Annex B, 1.10	Rather than 'commence' a Performance Assessment it could say 'conduct'	Agree - change made	Closed
462	Informal Consultation	UKPN	Annex B, 1.11	Superfluous para	Agree - change made	Closed
463	Informal Consultation	UKPN	Annex B, 1.12	Step 3 required significant review to remove repetition and inconsistencies	updated drafting	Closed
464	Informal Consultation	WPD	Annex B, 1.12	The DPCR5 period	Agree - change made	Closed
466	Informal Consultation	UKPN	Annex B, 1.13	Should LRE be a defined term?	Agree - should be DPCR5 Load Related Expenditure	Closed
467	Informal Consultation	WPD	Annex B, 1.13(i)	Paragraph formatting changes here.	Agree - change made	Closed
468	Informal Consultation	NPG	Annex B, 1.13(ii)	Although the meaning was quite clear, I think these words - 'expected to be' - are technically still needed. This may also need to be reproduced in the other places where the definition of efficiency appears.	Agree - change made	Closed
469	Informal Consultation	WPD	Annex B, 1.13(ii)	The DPCR5 period	Agree - change made	Closed
470	Informal Consultation	UKPN	Annex B, 1.14	Link back to 1.13	Point noted	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
471	Informal Consultation	NPG	Annex B, 1.15	These small additions - 'in which case' - are necessary for the content of the bullets to follow directly from the introductory sentence	Agree - change made	Closed
473	Informal Consultation	UKPN	Annex B, 1.16	Paragraph on deciding which schemes, programmes of work or Items of LRE have not been efficient - How does this interact with the points above? Can it not be defined by them?	Point noted - no change	Closed
474	Informal Consultation	WPD	Annex B, 1.16	Included to ensure that there is no misunderstanding of the interpretation of efficiency - reference to para 1.13.	Agree - change made	Closed
475	Informal Consultation	UKPN	Annex B, 1.17	This seems to make the analysis in point 3 above redundant	Point noted - no change	Closed
476	Informal Consultation	UKPN	Annex B, 1.17	Save for first bullet on 1.17, we are unclear what 1.16/1.17 adds over what is already stated in earlier para. For unit costs point (first bullet in 1.17), this could be added to 1.13 if rest of removed	Point noted - no change	Closed
477	Informal Consultation	UKPN	Annex B, 1.18(i)	The standard list of other information used elsewhere (e.g. DPCR5 RIGs submissions) should be added here	Agree - change made	Closed
478	Informal Consultation	ENWL/SSE/WPD/UKPN	Annex B, 1.18(ii)	This sentence seems to have been overwritten by the subsequent title 'Assessing LHVC connections'/It is not clear what this subparagraph is trying to capture. Suggest it is intended to read 'the Authority's own analysis of LVHC connections'. / Is something missing here?/ This is unclear and is already covered by points above/Formatting Assumed to be a heading for the next section.	Agree - this was intended to be the heading for the next section. Amended	Closed
482	Informal Consultation	UKPN	Annex B, 1.19	This is repetition of 1.14 point 2	Point noted - no change	Closed
484	Informal Consultation	SPEN	Annex B, 1.21(ii)	cost efficiency implies a unit cost efficiency assessment which is explicitly excluded in Para 1.17.	Agree - reference to 'cost' removed	Closed
485	Informal Consultation	WPD	Annex B, 1.22	Language - 'will include a review of' evidence	Agree - change made	Closed
486	Informal Consultation	UKPN	Annex B, 1.23	Is 'expenditure changes' different from allowance?	Point noted - updated drafting	Closed
487	Informal Consultation	WPD	Annex B, 1.23	It is unclear what this means. What is 'technical nature of the expenditure changes'?	Agree - term removed	Closed
488	Informal Consultation	WPD	Annex B, 1.24	Definition - the DPCR5 Period	Agree - change made	Closed
489	Informal Consultation	SPEN	Annex B, 1.25	Replace 'should' with 'may'.	Agree - change made	Closed
490	Informal Consultation	WPD	Annex B, 1.27	Reference to 'conventional solution' is required so that an overall saving can be demonstrated.	Agree - change made	Closed
491	Informal Consultation	WPD	Annex B, 1.27	Language - use 'licensees' to make consistent with wording elsewhere	Agree - change made	Closed
492	Informal Consultation	WPD	Annex B, 1.27	Definition - the DPCR5 Period	Agree - change made	Closed
493	Informal Consultation	WPD	Annex B, 1.28	Language - for clarity add 'to obtain the Load Related Efficient Re-opener Expenditure, the...'	Agree - change made	Closed
494	Informal Consultation	WPD	Annex B, 1.30	Definition - Real Price Effects	Agree - definition added.	Closed
495	Informal Consultation	NPG	Annex B, 1.32 (Table 1)	This should be 1.081: see HVP table (which contains the correct figure)/ Different from C1 para 1.30 = 1.081	Agree - number changed for consistency with HVP	Closed
496	Informal Consultation	UKPN	Annex B, 1.32	This needs to talk about RPE as the first time you find it is an RPE adjustment is when you read the table title	RPEs are referenced in two paragraphs before this. No change to text.	Closed
497	Informal Consultation	SPEN	Annex B, 1.32 (Table 1)	We are unclear on the source of the values in the table and it would aid transparency if Ofgem could clarify the values through supporting information.	Email with RPE calculation sent to DNOs	Closed
499	Informal Consultation	NPG	Annex B, 1.32 (Table)	Change to 'Load Related' – consistent with definitions?	Agree - change made	Closed
500	Informal Consultation	WPD	Annex C1, 1.3	The Authority does not determine the 'content' of the PAS - should be 'requirements'	Agree - change made	Closed
501	Informal Consultation	WPD	Annex C1, 1.04	Proportionality is covered by the next point. This point relates more to timings.	Agree - change made	Closed
502	Informal Consultation	UKPN	Annex C1, 1.07	The "unless otherwise notified" could be read as being with respect to para 1.4 when it is actually in respect of the need to submit a PAS. Might be worth rewording this for clarity	Agree - change made	Closed
503	Informal Consultation	ENWL	Annex C1, 1.17	Need to clarify that 'delayed or deferred' are into another price control period	Agree - change made	Closed
504	Informal Consultation	NPG	Annex C1, 1.17	Should it be clearer how this adjustment would work? i.e. assume the adjustment would be an increase, so it would aid understanding to say this? KAM - I am not clear why there is an expenditure adjustment for deferrals? What is the rationale	Agree - change made	Closed
505	Informal Consultation	SSE	Annex C1, 1.17	Reference to 'project' at end of para should be 'projects'.	Agree - change made	Closed
506	Informal Consultation	UKPN	Annex C1, 1.18	Add new sub-bullet 'the cost of the project as a whole, including whether equivalent or ongoing works have or have not been funded as part of the RIIO-ED1 settlement'.	Agree - change made	Closed
507	Informal Consultation	NPG	Annex C1, 1.18(b)	The whole document should align on either 'a HVP' (used elsewhere) or 'an HVP' (used here)	Agree - change made	Closed
508	Informal Consultation	WPD	Annex C1, 1.19 (Heading)	HVP Efficient Re-opener Expenditure' - not defined in the Glossary	Agree - change made	Closed
509	Informal Consultation	ENWL	Annex C1, 1.26	The default position needs to reference back to the outcome of step 4	Agree - change made	Closed
510	Informal Consultation	WPD	Annex C1, 1.26	Language - for clarity add 'to determine the HVP Efficient Reopener Expenditure'	Agree - change made	Closed
511	Informal Consultation	SSE	Annex C1, 1.28	The definition given of 'HVP Efficient Qualifying Expenditure' differs from that set out in Appendix 1 Glossary. In addition, in both para 1.28 and Appendix 1 Glossary, reference is made to 'HVP Efficient Reopener (E)xpenditure', which itself is not a defined term.	Definition of HVP Efficient Re-opener Expenditure has been added.	Closed
512	Informal Consultation	WPD	Annex C1, 1.29	This implies that the RPE adjustment only applies to load related and asset replacement HVPs. It would be clearer if the table covered all the different types of HVP (e.g. BT21CN).	Agree - change made	Closed
513	Informal Consultation	WPD	Annex C1, 1.29	Definition - Real Price Effects	Agree - change made	Closed
514	Informal Consultation	ENWL	Annex C1, 1.30	1.080 in LRR. Check for correct value	Value checked.	Closed
515	Informal Consultation	ENWL	Annex C1, 1.30	Need to be clear that this row also applies to BT21CN	Agree - change made	Closed
516	Informal Consultation	SPEN	Annex C1, 1.30 (Table 1)	This value differs from that stated in the LRE section. Annex B para 1.32. We are unclear on the source of these values and it would be aid transparency if Ofgem could clarify through supporting information.	Value checked.	Closed
517	Informal Consultation	SSE	Annex C2, 1.01(ii)	Insert 'a' between 'where' and 'HVP' in row 1.	Agree - change made	Closed
518	Informal Consultation	NPG	Annex C2, 1.02	These steps are all ones that The Authority carries out, so they shouldn't mention the Performance Assessment Submission (which the licensee is better placed to do)	Agree - change made and also changed title at 1.9.	Closed
519	Informal Consultation	SPEN	Annex C2, 1.02	This step is just referred to as Performance Assessment in other annexes	Drafting change made.	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
520	Informal Consultation	SSE	Annex C2, 1.02	The second bullet refers to the 'Performance Assessment Submission'. Suggest this is deleted given that this list focuses on the Authority's steps.	Drafting change made.	Closed
521	Informal Consultation	WPD	Annex C2, 1.02	The Authority does not carry out the Performance Assessment Submission so need to change Step 2.	Agree - change made	Closed
522	Informal Consultation	NPG	Annex C2, 1.12	Consistency – in some other places the term is 'a HVP'	Agree - change made	Closed
523	Informal Consultation	NPG	Annex C2, 1.15(b)	Isn't there a gap in either case, even if it was in best interests of customers? Isn't this relevant to the choice in step 6 of whether to apply penalty rate?	Agree - change made	Closed
524	Informal Consultation	ENWL	Annex C2, 1.17	See comment on 1.8 above - ie 16.10 refers to the situation where "...the Authority determines that there will be an adjustment for the licensee under any of the methodologies..." so not sure if this works	Correct reference inserted.	Closed
525	Informal Consultation	UKPN	Annex C2, 1.2	All step headings should be capitalised.	Agree - change made	Closed
526	Informal Consultation	ENWL	Annex C2, 1.22	Subject to 1.21?	Agree - change made	Closed
527	Informal Consultation	NPG	Annex C2, 1.22(a)	Without the addition of 'and allowances' the paragraph read as if some costs should be added to some allowances	Agree - change made	Closed
528	Informal Consultation	UKPN	Annex C2, 1.22(a)	Needs to be clear that any adjustment will account for work not funded in ED1	Agree - change made	Closed
529	Informal Consultation	NPG	Annex C2, 1.22(d)	This duplicates (a) to (c) to some extent, but it also adds in factors including the efficiency of outcomes, and whether things were in the consumer interest. These factors should all weigh in the evaluation of the HVP network outputs gap.	Agree - change made	Closed
530	Informal Consultation	NPG	Annex C2, 1.22(d)	Reference to 'determining the value of the HVP Network Outputs Gap' repeats the introductory sentence so can be deleted.	Agree - change made	Closed
531	Informal Consultation	NPG	Annex C2, 1.23	This backstop provision would helpfully ensure things cannot 'fall between the gaps', so to speak, due to the timing of projects which do not align neatly with the price control period boundaries.	Agree - change made	Closed
532	Informal Consultation	SPEN	Annex C2, 1.25	This section states that the HVP allowances will be used to profile any Outputs gap for HVP. This creates an inconsistency between the profile for the gap and the profile for the HVP expenditure reopener, which is based on actual expenditure. We believe that using actual expenditure is the most appropriate approach.as it would ensure the treatment of double counting between HVP outputs and the HVP reopener was fair and equitable.	We consider that the most appropriate way to profile the HVP Network Outputs Gap is to do so based on allowances. Ideally, we would profile the HVP Re-opener adjustment on the same basis - however the existing Handbook text already included provisions for profiling based on actuals. Our preference is to not amend existing text or make changes to already agreed upon policy unless absolutely necessary.	Closed
533	Informal Consultation	UKPN	Annex C2, 1.26	Here and in 1.27 they are hard typed cross references and not links to another para	Agree - change made	Closed
534	Informal Consultation	SSE	Annex C2, 1.27	The final section of text refers to the DPCR5 IQI Incentive Rate multiplied by a factor of 1.025. This aligns with a separate defined term ('DPCR5 Network Outputs Incentive Rate'). It is clearer to the reader if left as set out in para 1.27, but questions the usefulness of the separately defined 'DPCR5 Network Outputs Incentive Rate' term.	Agree - change made	Closed
535	Informal Consultation	WPD	Annex C2, 1.3	The Authority will not specify the 'content of the PAS so need to change to 'requirements'.	Agree - change made	Closed
536	Informal Consultation	WPD	Annex C2, 1.4	Proportionality is dealt with in the next para. This para relates to timing.	Agree - change made	Closed
537	Informal Consultation	SSE	Annex C2, 1.6	Suggest that where there is no DPCR5 HVP allowance, it is not necessary to rely on an Initial High Level Analysis to indicate that there is no requirement on the licensee to submit a PAS. As such, suggest text is amended to read 'Where an Initial High Level Analysis indicates that there was no DPCR5 HVPs allowance for the licensee, ...'.	Agree - change made	Closed
538	Informal Consultation	UKPN	Annex C2, 1.6	Does not require an assessment to identify where there was no HVP allowance.	Agree - change made	Closed
539	Informal Consultation	SSE	Annex C2, 1.7 (ii)	This subparagraph does not appear to belong here. This para relates to instances where licensees are not required to submit a PAS. It seems odd that a licensee would not be asked to submit a PAS in the event that the Authority's Initial High Level Analysis indicates a full Performance Assessment. Indeed this is at odds with para 1.1 of Annex E, which require a PAS in order for the Authority to undertake its Performance Assessment.	Agree that this is unlikely scenario - the intention is to protect licensees from any potential surprise adjustments, where the Authority does not request a PAS.	Closed
540	Informal Consultation	ENWL	Annex C2, 1.7(ii)	Contradicts the first sentence in this section	Disagree. Where the Authority identifies that no additional information is required, this provision protects the licensee in the unlikely event that the Authority still proposes to make an adjustment.	Closed
541	Informal Consultation	ENWL	Annex C2, 1.8	16.10 refers to the situation where "...the Authority determines that there will be an adjustment for the licensee under any of the methodologies..." so not sure if this works	Reference checked.	Closed
542	Informal Consultation	UKPN	Annex C2, 1.9	As there are multiple annexes then "the" will need to be "this" for clarity – I haven't changed this in the other annexes	Agree - change made	Closed
543	Informal Consultation	UKPN	Annex C2, 1.9	Why not 1.5 in this annex which brings consistency to C1	Agree - change made	Closed
544	Informal Consultation	WPD	Annex D, 1.1	Comment (see definitions in Glossary) is not required – all capitalised terms are defined.	Agree - change made	Closed
545	Informal Consultation	WPD	Annex D, 1.3(ii)	This leads to a double negative. The introduction refers to items not covered. (ii) should relate to the income received from connecting customer contributions.	Agree - change made	Closed
546	Informal Consultation	UKPN	Annex D, 1.4	"on [date]" would read better	Agree - change made	Closed
547	Informal Consultation	WPD	Annex D, 1.7	Reference - is this 15.91 (b)?	Agree - change made	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
548	Informal Consultation	BG	Annex E 2.1	<p>This section should include the other requirements set out in September:</p> <p>Why no asset replacement/refurbishment occurred at HI5 assets where investment was planned based on the DNO's forecasts/Ofgem allowances.</p> <p>Why no asset replacement/refurbishment occurred at assets where investment was not planned based on the DNO's forecasts/Ofgem allowances but the asset is currently HI5.</p> <p>Whether any other non-forecast asset replacement/refurbishment was required and the impact this had on HI /risk points.</p> <p>How the DNO has reprioritised work across HI asset categories and justify why the reprioritisation was appropriate.</p> <p>How the DNO has updated its relevant asset replacement/refurbishment investment plan to take account of changes in demand, consideration of alternative solutions etc, including CBAs where appropriate.</p>	Drafting added.	Closed
549	Informal Consultation	BG	Annex E 2.1(v)	As per September, text should be added to the following effect "If the licensee has carried out substantial volumes of refurbishment, this should include justification for this decision and to show that this work provided appropriate value for money for consumers."	Agree - change made	Closed
550	Informal Consultation	ENWL/SPEN	Annex E, 1.1	Para references - check all/ Paragraph references need updating	Checked references	Closed
552	Informal Consultation	WPD	Annex E, 1.2	TMA' - Acronym used in 1.4	Agree - change made	Closed
553	Informal Consultation	UKPN	Annex E, 1.4	We either need to state when or cross refer to where it states this elsewhere	Agree - change made	Closed
554	Informal Consultation	SPEN	Annex E, 2	Duplication, should be deleted.	Agree - change made	Closed
555	Informal Consultation	UKPN	Annex E, 2.1	Caveat to 1.4	Agree - change made	Closed
556	Informal Consultation	NPG	Annex E, 2.1(i)	You mean the DPCR5 period.	Agree - change made	Closed
557	Informal Consultation	NPG	Annex E, 2.1(i)	Might it not submit information that it has delivered the Agreed Network Outputs.	Qualitatively Equivalent Network Outputs covers both agreed and adjusted	Closed
558	Informal Consultation	NPG	Annex E, 2.1(i)	You mean the DPCR5 period.	Agree - change made	Closed
559	Informal Consultation	NPG	Annex E, 2.1(ii)	You mean the DPCR5 period.	Agree - change made	Closed
560	Informal Consultation	NPG	Annex E, 2.1(iii)	Where is Legal and Safety defined?	It is not defined - made lower case to reflect this.	Closed
561	Informal Consultation	NPG	Annex E, 2.1(iv)	The most it will do is 'suggest' or 'indicate'. It won't 'demonstrate'	Agree - change made	Closed
562	Informal Consultation	NPG	Annex E, 2.1(iv)	Is it possible to deliver a lower HI Target better? That term is defined in such a way that you can't deliver a lower one. (You can deliver a performance that is lower than the Target.)	Agree - change made	Closed
563	Informal Consultation	NPG	Annex E, 2.1(iv)	Here you mean the DPCR5 review not the period.	Text deleted	Closed
564	Informal Consultation	ENWL	Annex E, 2.1(vii)	Cannot envisage scenario?	Text changed to clarify	Closed
565	Informal Consultation	NPG	Annex E, 2.1(vii)	Accrued by whom? Do you mean taken into account in the DPCR5 Outputs? Or do you mean customers accrue the actual benefits in that period?	removed 'accrued'	Closed
566	Informal Consultation	NPG	Annex E, 2.1(vii)	This doesn't capture what you mean 'related to DPCR4' is unclear.	Agree - change made	Closed
567	Informal Consultation	NPG	Annex E, 2.1(vii)	Not sure what you mean here: DPCR5 Period or DPCR5 Review?	Should be DPCR5 period - clarity added	Closed
568	Informal Consultation	ENWL	Annex E, 2.2	Para reference -1.9	Checked references	Closed
569	Informal Consultation	NPG	Annex E, 2.3(i)	Given the defined term, is it possible for a Material Change to have an impact on a term that is fixed in its meaning and that meaning is not altered by Material Changes?	changed text and definition to provide additional clarity	Closed
570	Informal Consultation	NPG	Annex E, 2.3(i)	Again, how could Material Changes affect something that is already set.	changed text and definition to provide additional clarity	Closed
571	Informal Consultation	WPD	Annex E, 2.3(i)	Language - use of 'all' when referring to Material Changes may not be necessary.	Deleted use of 'all'	Closed
572	Informal Consultation	NPG	Annex E, 2.4	Is that not a decision made by the Authority after it has received the Performance Assessment Submission? If so, how can this requirement work? (I think the different formulation for LI works properly).	changed text and definition to provide additional clarity	Closed
573	Informal Consultation	NPG	Annex E, 2.5(i)	Does this work if the licensee didn't deliver the Agreed Network Outputs?	Agree - change made	Closed
574	Informal Consultation	NPG	Annex E, 2.5(ii)	I couldn't find this defined term.	Not intended to be a defined term - capitalisation removed.	Closed
575	Informal Consultation	NPG	Annex E, 2.5(ii)	Is this correct? It may be, but it seems to have a lot of terms in it. Do we need Qualitatively Equivalent Network Outputs in here? I can see that this helps convey the idea that the move from 'Agreed' to 'Adjusted' must preserve consistency with what was funded. Is that your purpose?	Simplified text to just rebasing	Closed
576	Informal Consultation	NPG/WPD	Annex E, 2.6(i)	Is 'agreed NOMs' meant to be undefined/ use 'Agreed Network Outputs' as this is the defined term	Agree - change made	Closed
577	Informal Consultation	WPD	Annex E, 2.6(ii)	It is not clear what this means. Any re-profiling would not be for the impact of intervention, it would be for the underlying condition of the asset. Is the intent of this principle to stop licensees moving more assets into HI5 where there are already sufficient to deliver the intervention plan?	Removed	Closed
578	Informal Consultation	SPEN	Annex E, 3	Duplicated, should be deleted.	Agree - change made	Closed
579	Informal Consultation	UKPN	Annex E, 3.1	As 2.1	Agree - change made	Closed
580	Informal Consultation	NPG	Annex E, 3.1(ii)	As before. Can this occur as a matter of logic given the way these terms are defined.	Consider current drafting is clear. No change made.	Closed
581	Informal Consultation	ENWL	Annex E, 3.1(iv)	Add load-related to reference to reinforcement in sub paragraphs (d) and (e)	Agree - change made	Closed
582	Informal Consultation	NPG	Annex E, 3.1(iv)(a)	This assumes the licensee thinks it was appropriate.	Agree - change made	Closed
583	Informal Consultation	NPG	Annex E, 3.1(iv)(c)	In HI you also referenced 'further Interventions' Any reason not to do so here?	Agree - change made	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
584	Informal Consultation	NPG	Annex E, 3.1(iv)(d)	But 'reinforcement' may have occurred. The drafting only works where your supposition is true.	Agree - change made	Closed
585	Informal Consultation	NPG	Annex E, 3.1(iv)(e)	But 'reinforcement' may have occurred. The drafting only works where your supposition is true.	Agree - change made	Closed
586	Informal Consultation	NPG	Annex E, 3.2	As before, can this defined term be impacted by Material Changes if it is already fixed.	Agree - change made	Closed
587	Informal Consultation	SPEN	Annex E, 3.2 (i)	Reference to 'outputs' should be replaced by 'Agreed Network Outputs' and reference to 'LI Risk Points set out in' should be replaced by 'LI Risk Points derived from the Agreed Network Outputs'.	Agree - change made	Closed
588	Informal Consultation	ENWL/NPG	Annex E, 3.3	Might sit better in NOMs methodology, perhaps under 1.36/ Is this paragraph relevant to this Annex which is about what the DNO submits.	Agree - change made	Closed
590	Informal Consultation	NPG	Annex E, 3.4	'indicates' or 'suggests' would be more accurate than 'finds'.	Agree - change made	Closed
591	Informal Consultation	NPG	Annex E, 3.5	Is this word - 'agreed' material changes correct?	Agree - term removed	Closed
592	Informal Consultation	NPG	Annex E, 3.5(i)	As before. I don't think it can impact this term - 'Agreed Network Outputs'.	Agree - reference to 'Agreed Network Outputs' removed.	Closed
593	Informal Consultation	SPEN	Annex E, 3.6(i)	The methodology should include reference to hours at risk in the rebasing as it is a key differentiating factor between the higher LI Bands.	Agree - change made	Closed
594	Informal Consultation	SPEN	Annex E, 3.6(i)	Limits the scope of Material Changes to substation capacity with changes to forecast demand being captured through the Load Related Re-Opener. As the quantitative assessment for the LI component of NOMs Network Outputs will be driven by the LI Risk Point analysis consideration should also be given to licensee's explanation of changes affecting customer numbers associated to Demand Groups.	Agree - change made	Closed
595	Informal Consultation	NPG	Annex E, 3.6(ii)	Before you capitalised 'final proposals'? (see 2.6.(iii)).	Agree - change made	Closed
596	Informal Consultation	ENWL	Annex E, 3.7(i)	Add reference to "component of" Agreed Network Outputs	Agree - change made	Closed
597	Informal Consultation	NPG	Annex E, 4.1	Should the list be expanded to cover something relating to the inherent volatility in Fault Rates?	Agree - amended point (f) to include this	Closed
598	Informal Consultation	UKPN	Annex E, 4.1	As 2.1	Agree - change made	Closed
599	Informal Consultation	NPG	Annex E, 4.1(i)	Is this the DPCR5 period.	Agree - change made	Closed
600	Informal Consultation	NPG	Annex E, 4.1(i)(a)	Exceptional Events' is not defined in Glossary at Appendix 1.	Agree - this should be lower case as does not require a definition.	Closed
601	Informal Consultation	NPG	Annex E, 4.1(i)(c)	Is this the DPCR5 period.	Agree - change made	Closed
602	Informal Consultation	NPG	Annex E, 4.1(i)(c)	Should 'fault rate' be a capitalised term?	Agree - change made	Closed
603	Informal Consultation	NPG	Annex E, 4.1(i)(c)	Should 'fault rate' be a capitalised term?	Agree - change made	Closed
604	Informal Consultation	NPG	Annex E, 4.1(i)(d)	Should 'fault rate' be a capitalised term?	Agree - change made	Closed
605	Informal Consultation	NPG	Annex E, 4.1(i)(e)	Should 'fault rate' be a capitalised term?	Agree - change made	Closed
606	Informal Consultation	UKPN	Annex E, 4.1(i)(f)	This would more logically be "a review of its forecast"	Agree - change made	Closed
607	Informal Consultation	WPD	Annex E, 4.1(i)(f)	The licensee may determine that there were flaws in the forecasting methodology, so they may not be able to provide justification for the original forecast. The Authority may still disregard this as an explanation for under-performance.	See 597	Closed
608	Informal Consultation	WPD	Annex E, 4.1(ii)	Add reference to "Fault Rate" Asset Category	Agree - change made	Closed
609	Informal Consultation	WPD	Annex E, 4.1(ii)	Fault cause reporting should have no impact on the fault rate. There may however be changes to fault categorisation reporting.	Agree - reference changed to 'fault categorisation reporting'	Closed
610	Informal Consultation	NPG	Annex E, 4.1(vi)	I don't think there were any. There was just a forecast.	Agree - change made	Closed
611	Informal Consultation	ENWL	Annex E, 5.5	Missing n-2	Agree - change made	Closed
612	Informal Consultation	WPD	Annex E, 5.14	Delete use of phrase 'as a minimum' as it contradicts the use of 'may' in highlighting reporting requirements.	Agree - reference to 'as a minimum' removed	Closed
613	Informal Consultation	ENWL	Annex E, 5.14(i)	Add reference to "addressing" or "deferring"	Agree - change made	Closed
614	Informal Consultation	ENWL	Annex E, 5.14(ii)	Add reference to "addressing" or "deferring"	Agree - change made	Closed
615	Informal Consultation	UKPN	Annex E, 5.14(iii)	i & ii are plural, if iii is to say singular it needs to cover demonstration for each Innovation Solution	Agree - change made	Closed
616	Informal Consultation	UKPN	Annex E, 5.15	this is too vague, does "in respect of Innovation Solutions" work?	Agree - change made	Closed
617	Informal Consultation	ENWL	Annex E, 5.15(ii)	Wording in 6.7 is clearer	Agree - text from 6.7 used here	Closed
618	Informal Consultation	UKPN	Annex E, 6.6(iii)	As 5.14	Agree - change made	Closed
619	Informal Consultation	UKPN	Annex E, 6.7	As 5.14	Agree - change made	Closed
620	Informal Consultation	WPD	Annex E, 6.7	Language - use 'licensees' to make consistent with other methodologies	Agree - used 'licensees'	Closed
621	Informal Consultation	SSE	Annex E, 6.13 (iii)	Reference to 'cost efficient manner' is not consistent with policy on efficiency elsewhere in drafting. Suggest this is amended to read 'an assessment of whether outputs have been delivered in a manner that is deemed to be consistent with the definition of efficiency in para 1.11 of Annex C1 and whether the Delivered HVP Network Outputs are in the interest of consumers'.	Agree - change made	Closed
622	Informal Consultation	UKPN	Annex E, 6.14(i)(a)	This would be better worded as "an estimate of the costs that will be spend in RIIO-ED1 to complete the project"	Agree - change made	Closed
626	Informal Consultation	NPG	Glossary	DPCR4 - This doesn't work for all the situations where this term is used. Sometimes you use it to mean a period of time, sometimes the price control review itself, and sometimes the price control that resulted from that review.	Agree - change made throughout	Closed
627	Informal Consultation	NPG	Glossary	DPCR5 - Ditto above.	Agree - change made	Closed
628	Informal Consultation	NPG	Glossary	DPCR5 - Alphabetical order gone astray.	Agree - change made	Closed
629	Informal Consultation	NPG	Glossary	DPCR5 HVP - There doesn't seem to be a definition in chapter 15	Agree - definition added	Closed
630	Informal Consultation	NPG	Glossary	DPCR5 Network Output Measures - I think this is probably ok, but remember whenever you use this term you are referring to the measure, not the target output that is captured by some metric where measurement is carried out in that way.	Point noted - no change	Closed
631	Informal Consultation	NPG	Glossary	DPCR5 NOMs Failure to Deliver Outputs Methodology - Better to say 'The methodology set out in Annex A1 of this handbook'?	Agree - change made and equivalent changes made for other methodologies.	Closed
632	Informal Consultation	NPG	Glossary	DPCR5 NOMs Revenue Adjustment - Is that the failure that is adjusted for, or is it failure to deliver Qualitatively Equivalent Network Outputs?	we have now deleted this definition - no longer used	Closed
633	Informal Consultation	NPG	Glossary	DPCR5 - This seems to appear twice and with slightly different definition.	Agree - we have deleted this version	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
653	Informal Consultation	SPEN/ NPG/WPD	Glossary	Superfluous text - 'Has the meaning given in the Glossary for DPCR5 RIGs' appears to be an error and should be deleted./ What is this referring to?	Agree - change made	Closed
634	Informal Consultation	NPG	Glossary	Fault Rate(s) - The 2012 RIGs only define this in the singular. That definition is not perfect, but perhaps its best to use it (as there are many other imperfect definitions).	No change	Closed
636	Informal Consultation	NPG	Glossary	Health Index (HI) - Perhaps this is ok, but bear in mind that this is defined in the 2012 RIGs as a framework for collating information. It is not the information itself.	Point noted - no change	Closed
637	Informal Consultation	NPG	Glossary	HI Target Delta - This formulation suggests either a difference or a delta. I don't think you need 'or delta'.	Agree - change made	Closed
638	Informal Consultation	NPG	Glossary	HI Target Delta - I think you mean a moment in time (i.e. 31 March 2015). You have defined DPCR5 to mean a set of price control arrangements, so this doesn't really work.	Agree - change made	Closed
639	Informal Consultation	NPG	Glossary	HI Risk Points Reduction - Do you mean derived or calculated?	Agree - change made	Closed
640	Informal Consultation	NPG/WPD	Glossary	HVP Efficient Re-opener Expenditure - Need definition of this?	Agree - definition added	Closed
641	Informal Consultation	NPG	Glossary	HVP Efficient Qualifying Expenditure - Would it be better to align this text with the description in the annex?	changed to align to C1 1.29	Closed
642	Informal Consultation	NPG	Glossary	HVP Post-threshold Amount - Needs updating in line with the revised wording in the main text of the handbook.	Agree - change made	Closed
643	Informal Consultation	NPG	Glossary	HI Risk Points Reduction - Does this definition work? I am not clear if this is meant to capture only the Risk Point impact of the Interventions that were specified in the Agreed Network Outputs. That seems an odd idea. Are such Interventions 'included in the Agreed Network Outputs'? Or do you mean the Interventions on which the Agreed Network Outputs were based, or something completely different? Also are you using 'interventions' here in the sense that it is defined? If so capitalise the 'i'.	Amended - removed 'Agreed Network Outputs' and capitalised the 'I' for 'Interventions'	Closed
644	Informal Consultation	NPG	Glossary	HI Target Delta - I think you might do better to define this by reference to the cells in the spreadsheet. Otherwise people will need to apply a lot of defined terms together to get what you mean.	Reference to cells in the spreadsheet can be provided informally if requested.	Closed
645	Informal Consultation	NPG	Glossary	LI Target - I think NOMs should be deleted from this as it is a defined term that doesn't precisely work in this definition. The definition works without it.	Agree - change made	Closed
646	Informal Consultation	NPG	Glossary	Load Index (LI) - This may be ok, but (as with HI) this is defined as a framework for collating information. It is not the information in that framework.	Point noted - no change	Closed
655	Informal Consultation	SSE	Glossary	DPCR5 IQI Incentive Rate - Reference to 'Special Condition CRC 18'. Believe it would be more correct to refer to Charge Restriction Condition 18 and remove reference to Special Condition.	Agree - change made	Closed
654	Informal Consultation	SPEN	Glossary	Network Output Measures - The definition needs reworked as NOMs includes fault rates but forecasts without intervention have never been produced for fault rates.	Agree - change made	Closed
647	Informal Consultation	NPG	Glossary	Material Changes - I think you might need to review whether you still want to use this definition. It has a number of features that I doubt Ofgem really wants to define this term, e.g. identified by the DNO in the DPCR5 period, reported in the Network Outputs Submission, discussed with Ofgem and is the DNO's view.	Agree - change made	Closed
656	Informal Consultation	SSE/WPD	Glossary	DPCR5 IQI Incentive Rate - Percentage values in table match 'slow money' values in table under 'Adjusted DPCR5 IQI Incentive Rate'. These values should correspond to the overall IQI incentive rate/ These values are incorrect; these are the adjusted rates. The IQI rates should be included here, i.e.49% for WPD 2011/12 onwards.	Agree - change made	Closed
648	Informal Consultation	NPG	Glossary	Network Output Measures (NOMs) - This is ok, but it is defined as a metric (i.e. a means of reporting). Sometimes you use this term as if it means a target.	Point noted - no change	Closed
649	Informal Consultation	NPG	Glossary	NOMs Network Output Gap - The defined term in that Glossary is not NOMs Network Outputs Gap, but Network Outputs Gap.	This has been updated	Closed
650	Informal Consultation	NPG	Glossary	Performance Assessment Submission - Before this I think you need a definition of Performance Assessment that is carried out by the Authority.	Agree - change made	Closed
651	Informal Consultation	NPG	Glossary	Qualitatively Equivalent Network Outputs - I don't think this is right. NOMs are a metric (i.e. a measurement). I don't think they are a thing that has been delivered. They are not a level of achievement. I think you may be confusing the term for how you measure something with the term you want for the level of achievement as measured using that means of measurement. Should this definition have some concept that the 'Qualitatively Equivalent Network Outputs' are broadly equivalent to the 'Agreed Network Outputs' or to the 'Adjusted Network Outputs'. If they are broadly equivalent, surely they will then be consistent with the price control.	This has been updated	Closed
657	Informal Consultation	SSE	Glossary	HI Target Delta - Remove superscript text from dates to be consistent with formatting elsewhere.	Agree - change made	Closed
658	Informal Consultation	SSE	Glossary	HVP Efficient Qualifying Expenditure - Definition refers to a term ('HVP Efficient Re-opener Expenditure'), which does not appear to be defined. Moreover, definition is not consistent with para 1.28 of Annex C1. Suggest definition refers to existing term of 'HVP Efficient Actual Expenditure'.	Agree - change made	Closed
623	Informal Consultation	ENWL	Glossary	HVP Post-threshold Amount - This definition doesn't work in underspend situations as it is not the DPCR5 expenditure that needs to be considered; it is the saving	Agree - change made	Closed
652	Informal Consultation	NPG	Glossary	Total HVP Network Outputs Gap' - change 'a revised' to 'the'	Agree - change made	Closed
659	Informal Consultation	SSE	Glossary	Load Related Efficient Qualifying Expenditure - Definition refers to undefined terms and references 'LRE' where it should refer to 'Load Related'. Note a fuller definition appears in para 1.30 of Annex B.	Agree - change made	Closed

ED1 Price Control Financial Handbook						
No.	Date raised	Comment from	Reference (within informal consultation document)	Comment	Response	Status
660	Informal Consultation	SSE	Glossary	Load-related Reopener Legacy Assessment Methodology - Capitalise 'related' in term, i.e. 'Load-Related'.	Agree - change made	Closed
624	Informal Consultation	ENWL	Glossary	Load Related Post-threshold Amount - This definition doesn't work in underspend situations as it is not the DPCR5 expenditure that needs to be considered; it is the saving	Agree - change made	Closed
668	Informal Consultation	WPD	Glossary	DPCR5 - should be the DPCR5 period	Agree - change made	Closed
625	Informal Consultation	ENWL	Glossary	Load Related Efficient Qualifying Expenditure - This definition can be read to suggest that one adds actual reopener expenditure to efficient actual expenditure which would create a double count. Suggest cross reference to relevant section of methodology	Drafting change made.	Closed
663	Informal Consultation	UKPN	Glossary	Load Index (LI) - This isn't a defined term – should be in full as per other refs to this doc – see for example "Material Changes" below	Agree - change made	Closed
661	Informal Consultation	SSE	Glossary	Permitting Conditions Costs' - In row 4, 'have be incurred' should read 'have been incurred'.	Agree - change made	Closed
664	Informal Consultation	UKPN	Glossary	Primary Substation - This isn't a defined term – should be in full as per other refs to this doc – see for example "Material Changes" above	Agree - change made	Closed
662	Informal Consultation	SSE	Glossary	Total HVP Network Outputs Gap - In row 1, reference to 'HVPS' should be 'HVPs'. Also reference to 'Network Outputs Incentive Rate' in row 2 should be ' DPCR5 Network Outputs Incentive Rate'.	Agree - change made	Closed
669	Informal Consultation	WPD	Glossary	Traffic Management Act Permit Costs Legacy Assessment - 'Act' has been dropped from the term used in chapter 15.	Agree - change made	Closed