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Dear Grant,

DPCR5 Close out: Statutory Consultation on changes to the RIIO-ED1 Financial Handbook

We welcome this consultation and the process that has led to its publication.

Given the recent informal consultation and subsequent working group, we were not anticipating significant errors at this stage in the process. Our recent review concurs with this. However, where we have identified inconsistencies or minor errors, we have logged these in the accompanying table in the same format as adopted previously.

We accept that these are of a minor nature, but should you wish to discuss any of these, please do not hesitate to get in touch.

Yours sincerely,

Gillian Hilton

Regulation, Networks.



ANNEX: Financial Handbook Drafting comments

PAGE REFERENCE	PARAGRAPH REFERENCE	COMMENT
e.g. 41	e.g. 15.152 (+ elsewhere)	Minor inconsistency point: Inconsistent use of Load-Related and Load Related, i.e. hyphen, no hyphen.
51	15.195	Reference to Total HVP Outputs Gap missing 'Network', i.e. Total HVP Network Outputs Gap.
79	16.16	Suggest amending to 'Where the Authority has specified in its Preliminary View that it considers that the licensee has not provided sufficiently robust and consistent data, it may, subject to the process set out in paragraph 16.14 to paragraph 16.68 , re-calculate the NOMs Network Outputs gap for the licensee. in line with the process set out in paragraph 16.64 to paragraph 16.68.' We believe this is more reflective of the intent.
99	1.6	Reference to paragraph 1.4 should be paragraph 1.5.
119	1.15 (ii)	Incorrect unit cost reference. We believe the reference should be to '(see unit cost D)' rather than 'unit cost B'.
121-137	Multiple	Minor inconsistency point: Steps referenced in Annex B talk of 'Determination of', while steps referenced in Annex C1 and C2 talk of 'Determine' (with the exception the overview of steps in para 1.2 on p133.
133 & 134	1.2 & heading above para 1.9	Minor inconsistency point: Suggest both references to Step 2 are amended as follows 'Undertake a Performance Assessment'.
173	Glossary	Reference in 'Load Related Post-threshold Amount' to 'DPCR5 LRE Aggregate Baseline Expenditure Allowance'. This does not appear to be a defined term.
173	Glossary	In the definition of 'Load Related Post-threshold Amount' reference is made to 'total DPCR5 expenditure'. We believe it would be clearer to reference a defined term, i.e. 'Load Related Efficient Re-opener Expenditure'.