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Tessa Quinton
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Our ref

Your ref

Date

6 January 2016

Dear Tessa

Statutory consultation on proposal for minor modifications to WPD's electricity distribution licence special conditions

I am writing on behalf of Western Power Distribution (East Midlands) plc, Western Power Distribution (West Midlands) plc, Western Power Distribution (South Wales) plc and Western Power Distribution (South West) plc, in response to Ofgem's consultation on the minor modifications to WPD's Fast Track CRCs, including the Network Assets Workbook.

We are satisfied that the modifications are of minor nature such as typos and formatting, or small additional points of clarification.

We also note that, as part of the statutory consultation, Monetised Risk Workbooks for each of the WPD licence areas were published. These relate to the Network Asset Indices Secondary Deliverable that is covered by SLC 51 and CRC 5D. However, unlike the Network Asset Workbook, the Monetised Risk Workbooks do not form part of the licence conditions, nor the RIIO-ED1 Regulatory Instructions and Guidance.

The Network Asset Workbook, itself, shows the Health Indices and Criticality Indices that comprise the Secondary Deliverables. The monetisation of Health Indices and Criticality Indices to create the Risk Indices is not included in the Network Asset Workbook. The monetisation of risk, based upon the data in the Network Asset Workbook, is performed in the published Monetised Risk Workbook.


It would be more appropriate for the representation of the Secondary Deliverables, in terms of Risk Indices, to be contained within the Network Assets Workbook and therefore included within the licence conditions. We, therefore, suggest that Network Assets Workbook should be reissued to include the derivation of monetised risk shown in the Monetised Risk Workbooks.

The definition of Network Assets Workbook would need to be amended with a new date of issue.

Network Assets Workbook means the file of that name in Microsoft Excel ® format containing worksheets setting out the Network Asset Secondary Deliverables published by the Authority on ~~21 May 2014~~.

Should you wish to discuss these comments further please contact Phil Mann at email pmann@westernpower.co.uk

Yours sincerely



ALISON SLEIGHTHOLM
Regulatory & Government Affairs Manager