**Strategic Commentary:**

**Strategic Performance Overview and**

**Costs and Volumes**

**Commentary**

**Version 1.0**

**[Enter regulatory year]**

**[Enter DNO/DNO group name]**

# 

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# Document purpose, contents and instructions

The overall purpose of the Strategic Commentary is to provide an explanation of DNO performance under the RIIO-ED1 price control and what is driving that performance. To meet this the Strategic Commentary should:

* provide an executive summary, focussing on key messages about performance (financial, output and cost), and presenting clear strategic insights;
* provide a summary of the key outputs, as detailed in Section 2, that the DNO has delivered during the year, setting them in context of the delivery of overall RIIO-ED1 price control outputs; and
* present the differences between allowances and actual/forecast spend and provide a narrative that explains the drivers of these variances.

The audience for the Strategic Commentary is Ofgem. Information should be appropriately technical and targeted. The Strategic Summary in Section 1 should be aimed at senior management in Ofgem, with the remainder informing the RIIO-ED1 team who carry out detailed reviews, analysis and benchmarking.

Commentary is required in response to specific questions included in this document. DNOs are welcome to include further comments or analysis to aid Ofgem’s understanding of the data presented. This is particularly important where DNOs have identified issues with the reporting pack or how the data could impact upon any analysis or benchmarking of the data.

Where additional comments are included, but there is no pre-defined response template, DNOs should insert an appropriate heading and commentary in the body of this document or appendix.

One Strategic Commentary document is required per DNO group. All comments, data tables, charts etc. should be clearly marked to show whether they relate to all the DNOs in the group or specific DNOs only. All prices reported in this document should be in 2012/13 price base and should be to one decimal place.

# Section A

1. Strategic Summary

Guide length: 3 pages

The Strategic Summary should include the following:

|  |  |
| --- | --- |
| **Section** | **Purpose** |
| 1. **Company performance:** summarised company view of performance in RIIO-ED1 by the CEO. | To understand what the CEO sees as important indicators of performance, key highlights, and areas for improvement or focus in the remainder of the price control. This should come from the CEO to ensure accountability and ownership of company performance. |
| 1. **Business plan delivery:** high-level update on the delivery of the business plan focusing on key management and asset management initiatives, any other relevant updates, and any key risks and associated mitigating actions. | To understand at a high level the key initiatives that will help deliver the business plan, any material changes in approach to deliver it since the business plan was conceived and key risks to delivery. |
| 1. **Company strategy:** update on overall strategy detailing how the company’s strategy and objectives will deliver against performance targets. | To understand if and how performance to date and forecast performance has influenced the company strategy in going forward. This should include what the DNO strategy is delivering for all key stakeholders. |
| 1. **Board update:** brief Chairman’s update on Board activities and areas of focus. | To understand the Board’s key areas of focus and if and why the focus has changed in the current year. This should come from the Board to ensure accountability and ownership of company performance. |

1. Output and incentive performance

Guide length: 6-10 pages

1. Primary output summary

A high level summary of annual output performance for the primary outputs as set out in the table below should be provided for each DNO in the group.

The overall RAG rating for each output should follow the guidance in Appendix 2, which is consistent with the RAG rating used in Ofgem’s RIIO-ED1 Annual Reports. Where there is no RAG rating guidance set by Ofgem (for Safety and Environment), DNOs should use and provide an explanation for their own approach.

DNOs should present data in line with the table below, and the tables set out in sub-sections (b) to (g). The tables should be amended to include all DNOs within a group under each output/measure rather than one table per DNO.

DNOs are welcome to present the data or additional data using different graphics, but these should be in addition to the tables set out below. DNOs are also welcome to provide additional commentary in any part of Section A (ie chapters 2-5).

For the avoidance of doubt, RAG rating applies to each DNO and not for each DNO group.

|  |  |  |
| --- | --- | --- |
| **Output** | **RAG** | **Comments** |
| Safety |  |  |
| Reliability and availability |  |  |
| Environment |  |  |
| Connections |  |  |
| Customer service1 |  |  |

1. This refers only to the customer satisfaction survey and complaints metric.

The social obligations output is not included in the above, as the key metric, Stakeholder Engagement and Consumer Vulnerability (SECV) scores, will not be available at the time when the Strategic Commentary is submitted.

1. Safety

As a minimum, DNOs should report on safety performance using any safety measure they believe appropriate.

1. Reliability and availability

As a minimum, DNOs should report on reliability and availability performance using the measures set out in the table below.

The Customer Interruptions (CI) and Customer Minutes Lost (CML) targets are the Ofgem targets, and the associated RAG rating guidance for these is set out in Appendix 2. For all other areas, Ofgem do not set a target but DNOs should note their own targets and RAG ratings should they have them, and detail their methods.

DNOs can add any further measures of performance they consider appropriate.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Measure** | **Target** | **Actual** | **RAG** | **Comments** |
| Customer Interruptions (CI)1 |  |  |  |  |
| Customer Minutes Lost (CML) 1 |  |  |  |  |
| Health Index (% of target) |  |  |  |  |
| Non-connections GSoP (no of failures) 2 |  |  |  |  |
| Non-connections GSoP (total payment (£)) |  |  |  |  |

1. This excludes exceptional events
2. This is the number of failures after exemptions
3. Environment

As a minimum, DNOs should report on environment performance using the measures set out in the table below. No targets have been set by Ofgem. Therefore, DNOs should note their own targets and RAG ratings should they have them, and detail their methods. DNOs can add any further measures of performance they consider appropriate.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Measure** | **Target** | **Actual** | **RAG** | **Comments** |
| Business carbon footprint, excl. losses (BCF) (tCO2e) |  |  |  |  |
| SF6 emissions (Kg) |  |  |  |  |
| Oil leakage (fluid filled cable top up) (litres) |  |  |  |  |

1. Connections

As a minimum, DNOs should report on connections performance using the measures set out in the table below.

The Time to Quote (TTQ) and Time to Connect (TTC) targets are the Ofgem targets and the associated RAG rating guidance for these set out in Appendix 2. For all other areas, Ofgem do not set a target but DNOs should note their own targets and RAG ratings should they have them, and detail their methods. For Guaranteed Standards of Performance (GSoP) (% of cases), DNOs should also use the RAG method as set out in Appendix 2. DNOs can add any further measures of performance they consider appropriate.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Measure** | **Target** | **Actual** | **RAG** | **Comments** |
| Time to Quote (LVSSA) |  |  |  |  |
| Time to Quote (LVSSB) |  |  |  |  |
| Time to Connect (LVSSA) |  |  |  |  |
| Time to Connect (LVSSB) |  |  |  |  |
| ICE penalty (£) |  |  |  |  |
| GSoP failures (no. of cases) |  |  |  |  |
| GSoP failures (% of cases)1 |  |  |  |  |
| GSoP connections payments (£) |  |  |  |  |

1. % of connection cases where the relevant Standard was applied but was not met.
2. Customer satisfaction

As a minimum, DNOs should report on customer satisfaction performance using the measures set out in the table below and the associated RAG ratings in Appendix 2. DNOs can add any further measures of performance they consider appropriate.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Measure** | **Target** | **Actual** | **RAG** | **Comments** |
| Customer Satisfaction Survey Interruptions | 8.2 |  |  |  |
| Customer Satisfaction Survey Connections | 8.2 |  |  |  |
| Customer Satisfaction Survey General Enquiries | 8.2 |  |  |  |
| Customer Satisfaction Survey Overall1 | 8.2 |  |  |  |
| Complaints metric | 8.33 |  |  |  |

1. Overall should be calculated using the following weightings: interruptions (30%), connections (50%) and general enquiries (20%).
2. Social obligations

The Stakeholder Engagement and Consumer Vulnerability (SECV) performance will not be available at the time of Strategic Commentary submission. However, while Ofgem do not set a target for the SECV initiative, DNOs should note their own target, should they have one. DNOs can add any further measures of performance they consider appropriate.

|  |  |
| --- | --- |
| **Measure** | **Target** |
| Stakeholder Engagement and Consumer Vulnerability Score |  |

1. Innovation performance

Guide length: 1-2 pages

DNOs should provide details of:

* The high-level vision for innovation and what innovation is aiming to achieve;
* The innovation stimulus funding awarded as set out in the table below;
* The impact of innovation to date in the RIIO-ED1 price control at a high level, e.g. reduced costs due to avoided reinforcement, achieving environmental targets; and
* Examples of innovative solutions adopted in the reporting year and their impact, e.g. this includes those incorporated into company policy and solutions implemented on the network.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **£m awarded to date in RIIO-ED1** | **£m spent to date in RIIO-ED1** | **Number of projects** | **Brief description of projects** |
| Network Innovation Allowance (NIA) |  |  |  |  |
| Network Innovation Competition (NIC) |  |  |  |  |
| Low Carbon Network (LCN) Fund |  |  |  |  |

1. Financial performance

Guide length: 2 pages

DNOs should report on the key financial metrics including:

* Allowed revenue (in reporting year), as extracted from R14 of Revenue Reporting Pack; and
* 8-year Return on Regulatory Equity (RoRE) and component parts as set out in the table below. This should be the RoRE based on the model used in the Ofgem Annual Reports. DNOs are welcome to provide an alternative view of RoRE alongside this, explaining the different assumptions used from that in the Ofgem model; and

|  |  |  |
| --- | --- | --- |
|  | **RoRE (%)** | **Commentary** |
| Baseline cost of equity |  |  |
| IQI additional income |  |  |
| Totex Incentive Mechanism (TIM) |  |  |
| Interruptions Incentive Scheme (IIS) |  |  |
| Broad Measure of Customer Service (BMCS)1 |  |  |
| Incentive On Connections Engagement |  |  |
| Time to Connect |  |  |
| Losses Discretionary Reward |  |  |
| Fines and Redress Payments |  |  |
| Tax Allowance Retained Within Deadband |  |  |
| Guaranteed Standards Payments |  |  |
| **RoRE Total** |  |  |

* Incentive revenue. This should be reported for all incentives as set out in the table below. This relates to in-year performance.

|  |  |  |
| --- | --- | --- |
| **Incentive** | **£m** | **% of maximum reward** |
| Totex Incentive Mechanism (TIM) |  | NA |
| Interruptions Incentive Scheme (IIS) |  |  |
| Broad Measure of Customer Service (BMCS)1 |  |  |
| Time to Connect Incentive (TTC) |  |  |
| Incentive on Connections Engagement (ICE) |  | NA |
| Losses Discretionary Reward scheme (LDR) |  | NA |
| **Total incentive payments** |  | - |

1. This excludes the SECV at this stage.

1. Cost and volume performance: actual and forecast costs vs. allowance[[1]](#footnote-2)

Guide length: 6-10 pages

Expenditure in this section should be reported:

* in 2012/13 prices;
* including Real Price Effects (RPE); and
* after indirect allocation.

1. Totex performance summary

As a minimum, DNO groups should provide for each DNO a high level summary of totex performance to date and forecasts, split by the eight aggregate cost categories set out in the table below. This can be presented as per the table below for each DNO or graphically. A high level summary of the key variances should be provided, with the detail in section (b).

There should be a complete table/graphic produced for each DNO.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Cumulative RIIO-ED1 to Date Actuals *minus* Allowance | | Forecast Actuals *minus* Allowance for whole of RIIO-ED1 | |
|  | £m | % | £m | % |
| Load Related |  |  |  |  |
| Non Load Capex (excluding Non-Operational Capex) |  |  |  |  |
| High Value Projects (HVPs) |  |  |  |  |
| Network Operating Costs (NOCs) |  |  |  |  |
| Closely Associated Indirects (CAIs) |  |  |  |  |
| Business Support Costs (BSCs) |  |  |  |  |
| Non-Operational Capex |  |  |  |  |
| Other costs within the Price Control (primarily Atypicals) |  |  |  |  |
| Totex adjustments (eg disallowed party margin, scrap/disposal proceeds, DRS8) |  |  |  |  |
| **Totex** |  |  |  |  |

1. Aggregated cost category performance and drivers

For each of the eight listed aggregated cost categories, DNOs should:

1. Provide narrative if they have experienced/will experience upward and/or downward cost pressures to date.
2. Explain the driver(s) of any under- or overspend to date (actual costs *minus* allowances) using the following categories:
3. **Efficiency**: deliberate management actions that result in underspend. For example, innovation and efficient working practices that have resulted in reduced unit costs or volumes.

*Example 1 - negotiation of external contracts for the delivery of High Value Projects, with strong commercial incentives to deliver efficiencies.*

*Example 2 - for a gas cable replacement scheme, installing a new cable into the pipe previously occupied by old cable, saving on excavation costs.*

*Example 3 - use of demand-side response contracts to defer a traditional reinforcement scheme to a date beyond RIIO-ED1.*

*Example 4 - redeployment of Closely Associated Indirect (CAI) staff to directly remunerated services.*

1. **Service enhancement**: deliberate management actions that result in overspend. For example, through increased volumes or unit costs.

*Example 1 – increase in overhead clearance activity following an inspection programme which revealed greater levels of non-compliance than anticipated at the start of the price control.*

1. **External factors**: over/underspend caused by factors outside the management control of the DNO that are not expected to unwind during the price control period.

*Example 1 - load demand is lower than forecast due to slower than expected economic growth. (gains)*

*Example 2 - unexpected and unprecedented external reaction to recent storms has led to greater investment than expected in storm resilience. (losses)*

*Example 3 - shortage of skilled tree-clearing operatives due to high demand increasing the costs at an industry level. (losses)*

1. **Provision in price control settlement**: instances where the DNO requested a different level of costs to that in the settlement, where at least part of this difference of view has persisted in actual costs.

*Example 1 - business support costs are in line with business plan submission, but allowances were higher than business plan submission. (underspend)*

*Example 2 - the allowance to deliver the volumes in the 132kV tower replacement programme was significantly lower than the submission and not achievable. The unit cost of a tower replacement is 20% higher than allowances. (overspend)*

1. **Re-phasing or timing of work:** Over/underspend caused by changes in the phasing of costs that is expected to unwind during the period.

*Example 1 - use of demand-side response contracts to defer a traditional reinforcement scheme to a later date but still within RIIO-ED1. Note: if this will also save costs in RIIO-ED1, the cost efficiency savings should be noted in category (a) when work is complete.*

*Example 2 - delay in rising and lateral mains expenditure due to longer than expected negotiations with landlords and council on scope of works.*

*Example 3 - active deferral of reinforcement spend while demand forecasts are updated and reviewed.*

1. **Other:** where over/underspend cannot reasonably be reported under (a) to (e) above, they can be reported under ‘other’ provided the drivers are clearly explained in narrative.

*1*

DNOs should give their best estimate of the percentage of under- or overspend allocated to each of the above categories of driver.

DNOs should report the data assurance activity they undertook to verify these percentages.

***Ofgem accepts that the percentage applied to each category of driver is subjective and any interpretation should reflect this. The percentages applied should still be subject to data assurance under the Network Data Assurance Report (NetDAR), but we accept that the level of assurance for this part of the Strategic Commentary may be different to the overall assurance applied to the other parts.***

The tables in the Costs & Volumes Reporting pack relating to each of the eight cost categories are listed in Appendix 3.

1. Forecasting methodology and assumptions

DNOs should:

* explain how forecasts were prepared and the key assumptions used;
* document any significant changes in forecasts from last year (+5% or – 5%) and the reasons for these if further detail than that provided in 5a and 5b is necessary; and
* explain any issues in comparing actual and forecast totex to allowed totex (with reference to table M17 in the Cost and Volumes Reporting pack).

# Section B

1. Cost performance: volume variations

Guide length: 2-4 pages

For the worksheets listed below DNOs should detail significant variations to agreed RIIO-ED1 volumes that have not already been covered in Section 5 above.

|  |  |
| --- | --- |
| **Worksheet** | **Reprioritisation of volumes** |
| CV1 - Primary Reinforcement |  |
| CV2 - Secondary Reinforcement |  |
| CV3 - Fault Level Reinforcement |  |
| CV4 - New Transmission Capacity Charges (NTCC) |  |
| CV5 - Diversions |  |
| CV6 - Diversions Rail Electrification |  |
| CV7 - Asset Replacement |  |
| CV8 - Refurbishment no Secondary Deliverable Improvement (no SDI) |  |
| CV9 - Refurbishment with a Secondary Deliverable Improvement (SDI) |  |
| CV10 - Civil Works Condition Driven |  |
| CV11 - Operational IT and Telecoms |  |
| CV12 - Black Start |  |
| CV13 - BT 21st Century (BT21CN) |  |
| CV14 - Legal and Safety |  |
| CV15 - QoS and North of Scotland Resilience |  |
| CV16 - Flood Mitigation |  |
| CV17 - Rising and Lateral Mains (RLMs)  In particular report what calculation method has been used to determine km of mains length. |  |
| CV18 - Overhead Clearances |  |
| CV19 - Worst Served Customers (WSC) |  |
| CV20 - Visual Amenity |  |
| CV21 - Losses |  |
| CV22 - Environmental Reporting |  |
| CV23 - RIIO-ED1 High Value Projects (HVP) Summary |  |
| CV23a - RIIO-ED1 High Value Project 1 (HVP1) |  |
| CV23b - RIIO-ED1 High Value Project 2 (HVP2) |  |
| CV23c - RIIO-ED1 High Value Project 3 (HVP3) |  |
| CV23d - RIIO-ED1 High Value Project 4 (HVP4) |  |
| CV23e - RIIO-ED1 High Value Project 5 (HVP5) |  |
| CV24 - DPCR5 High Value Projects |  |
| CV25 - Moorside |  |
| CV26 - Faults |  |
| CV27 - Severe Weather 1 in 20 |  |
| CV28 - Occurrences Not Incentivised (ONIs) |  |
| CV29 - Tree Cutting |  |
| CV30 - Inspections |  |
| CV31 - Repairs and Maintenance |  |
| CV32 - Dismantlement |  |
| CV33 - Substation Electricity |  |
| CV34 - Smart Meter Intervention DNO |  |
| CV35 - Operational Training (CAI) |  |
| CV39 - Directly Remunerated Services (DRS) |  |

1. Cost and volume performance: additional C&V table-by-table commentary

Guide length: 10 pages

1. Cost tables

**C4 - IT and Telecoms (Non-Op)**

|  |
| --- |
| **Change to IT strategy:** detail any significant change in the IT Strategy since submission of business plan and note the effect on IT and Telecoms (Non-Op) expenditure. Please also note any changes in the strategy on C13 – IT and Telecoms (Business Support) and CV11 – Operational IT and Telecoms. |
|  |

**C7 - STEPM (Non Op)**

|  |
| --- |
| **Additions to list in the definition:** detail any small tools, plant or equipment that are not listed in the current definition but are in your costs. |
|  |

**C13 - IT and Telecoms (Business Support)**

|  |
| --- |
| **Change to IT strategy:** note the effect of any reported change (in the commentary for C4) on IT and Telecoms (Business Support) expenditure. |
|  |

**C15 - Atypicals Non Severe Weather**

|  |
| --- |
| **Description of atypical event:** list and provide a brief description of all added atypical events in the worksheet. |
|  |

**C19 - Other Consented Activity**

|  |
| --- |
| **Description of Other Consented Activity:** provide a brief description of all listed Other Consented Activities in the worksheet. |
|  |

**C24 - Related Party Margin**

|  |
| --- |
| **Other related parties:** the worksheet allows DNOs to report data for up to fifteen related parties that transact with the DNO. Where the DNO transacts with more than fifteen related parties, the tables in the worksheet must be completed for those related parties that have the highest turnover from the DNO. For other related parties, report names and the details in the worksheet below. |
|  |

|  |
| --- |
| **Recharges from group affiliates and related undertakings:** providea detailed explanation of the margins included in recharges from group affiliates and related undertakings that do not directly trade with the DNO to each of the listed related parties. |
|  |

1. Cost and volume tables

**CV1 - Primary Reinforcement**

|  |
| --- |
| **Description of “Other” reinforcement activities:** provide a brief description of all listed “Other” reinforcement activities in the worksheet. |
|  |

**CV2 - Secondary Reinforcement**

|  |
| --- |
| **Description of “Other” reinforcement activities:** provide a brief description of all listed “Other” reinforcement activities in the worksheet. |
|  |

**CV3 - Fault Level Reinforcement**

|  |
| --- |
| **Description of “Other” fault level constraint schemes:** provide a brief description of all listed “Other” fault level constraint schemes in the worksheet. |
|  |

**CV5 - Diversions**

|  |
| --- |
| **Description of projects:** provide a brief description of all diversion projects. |
|  |

**CV6 - Diversions Rail Electrification**

|  |
| --- |
| **Description of projects:** provide a brief description of all rail electrification projects (by rail line). |
|  |

**CV8 - Refurbishment no SDI**

|  |
| --- |
| **Description of projects:** provide a brief description of all key refurbishment projects. |
|  |

**CV11 - Operational IT and Telecoms**

|  |
| --- |
| **Change to IT strategy:** note the effect of the any reported change (in the commentary for C4) on Operational IT and Telecoms expenditure. |
|  |

**CV14 - Legal and Safety**

|  |
| --- |
| **Description of “Other” legal and safety activity:** provide a brief description of all listed “Other” legal and safety activities in the worksheet. |
|  |

**CV15 - QoS and North of Scotland Resilience**

|  |
| --- |
| **QoS costs:** detail the additional equipment that reduces the impact of faults on customers and confirm that they could not be reported elsewhere in the pack. |
|  |

**CV26 - Faults**

|  |
| --- |
| **Emerging trends:** note any emerging trends in the fault rate data for the asset categories and reasons for these trends. |
|  |

|  |
| --- |
| **Variation in fault rates:** note any significant variations in the fault rates from forecast and reasons for these. |
|  |

**CV27 - Severe Weather 1 in 20**

|  |
| --- |
| **Severe weather 1-in-20 events:** list all the severe weather events, including the dates, included in the worksheet. |
|  |

**CV33 - Substation Electricity**

|  |
| --- |
| **Contract price and usage:** note any material change to contract prices and/or usage. |
|  |

**CV36 - NIA**

|  |
| --- |
| **Description of projects:** provide a brief description of all NIA projects. |
|  |

**CV37 - NIC**

|  |
| --- |
| **Description of projects:** provide a brief description of all NIC projects. |
|  |

**CV38 - IFI & LCN Fund**

|  |
| --- |
| **Description of projects:** provide a brief description of all ITI and LCNF projects. |
|  |

1. Memo tables

[**M3 - ED1 WSC Schemes**](file:///C:/Temp/Temporary%20Internet%20Files/Content.MSO/FA8B771.xlsx#'M3 - ED1 WSC Schemes'!A1)

|  |
| --- |
| **Scheme overview:** provide an overview of each WSC scheme. |
|  |

[**M4 - Enablers for RIIO-ED2**](file:///C:/Temp/Temporary%20Internet%20Files/Content.MSO/FA8B771.xlsx#'M4 - Enablers for RIIO-ED2'!A1)

|  |
| --- |
| **Explanation of progress:** explain what activities have been undertaken in the regulatory year under report to progress the roll out the enablers forecast in the RIIO-ED1 Business Plan. |
|  |

|  |
| --- |
| **Description of new enabler:** where a new enabler has been added, a detailed description of the technology, why it has been used instead of those forecast, and the incremental additional benefit this enabler will provide compared with the forecast. |
|  |

|  |
| --- |
| **Net benefit:** the net benefit of making these investments in total for all enablers in RIIO-ED1 by the end of RIIO-ED2 (regulatory year 2030-31) and over 45 years of the first deployment of any of these enablers. These should be calculated using Ofgem's RIIO-ED1 cost benefit analysis template. The net benefit calculations should be re-run each year, updating for actual activity and using the latest information to derive the forecast. |
|  |

|  |
| --- |
| **Key assumptions:** describe the key assumptions in the cost benefit analysis including, but not limited to, the low carbon scenario anticipated over the remainder of RIIO-ED1, during RIIO-ED2 and up to 45 years, with reference to how this is different to forecast used in the RIIO-ED1 business plan. The low carbon scenario assumption used in the cost benefit analysis should be the same as is used to complete the reinforcement worksheets. |
|  |

[**M5 - Severe Weather**](file:///C:/Temp/Temporary%20Internet%20Files/Content.MSO/FA8B771.xlsx#'M5 - Severe Weather '!A1)

|  |
| --- |
| **Severe weather events:** list all the severe weather events, including the dates, included in the worksheet. |
|  |

[**M6 - Metal Theft**](file:///C:/Temp/Temporary%20Internet%20Files/Content.MSO/FA8B771.xlsx#'M6 - Metal Theft'!A1)

|  |
| --- |
| **Reporting of Metal Theft in pack:** detail where the memo costs in M6 are reported elsewhere in the pack (e.g. legal and safety, faults). |
|  |

[**M7 - Protection Summary**](file:///C:/Temp/Temporary%20Internet%20Files/Content.MSO/FA8B771.xlsx#'M7 - Protection Summary'!A1)

|  |
| --- |
| **Differences in unit costs:** explain any differences in the unit costs (10% threshold) for like-for-like assets used in different activities. For example, batteries at 132kV substations in rows 13, 38 and 49. |
|  |

[**M8 - Link Boxes**](file:///C:/Temp/Temporary%20Internet%20Files/Content.MSO/FA8B771.xlsx#'M8 - Link Boxes'!A1)

|  |
| --- |
| **“Other” revised solutions:** list and provide a description of “other” revised solutions. |
|  |

[**M9b - Permit & Lane Rentals (ex ante)**](file:///C:/Temp/Temporary%20Internet%20Files/Content.MSO/FA8B771.xlsx#'M9c - Permit & Lane (reopener)'!A1)

|  |
| --- |
| **List of schemes:** note the full list of permit and lane rental schemes provided with an ex ante allowance and date these were established (these should not change for all RIIO-ED1 period). |
|  |

[**M9c - Permit & Lane Rentals (reopener)**](file:///C:/Temp/Temporary%20Internet%20Files/Content.MSO/FA8B771.xlsx#'M9c - Permit & Lane (reopener)'!A1)

|  |
| --- |
| **List of schemes:** note the full list of permit and lane rental schemes and the date these were established for which costs are reported. |
|  |

[**M14 - Drivers**](file:///C:/Temp/Temporary%20Internet%20Files/Content.MSO/FA8B771.xlsx#'M14 - Drivers'!A1)

|  |
| --- |
| **Growth factor:** explain the growth factor applied. |
|  |

1. Financial issues tables

**F2 – Net Debt and Tax Clawback**

|  |  |
| --- | --- |
|  | **Comments** |
| Within the “Other amounts due to/ (from) group companies per Balance Sheet (memorandum)” there are any amounts that are more than one year old. If this is so, explain whether or not these amounts should be considered as part of net debt for the purpose of assessing whether the gearing ratio has been exceeded. |  |
| If there are any derivative financial instruments held by a related party that are not included in the value reported in the table, quantify them and state which debt(s) is being hedged. | Interest rate swaps:  Losses and gains:  Cross currency swaps: |
| Identify any new debt or debt refinanced, or new derivative financial instruments in the regulatory year. | New debt in the year: |
| Detail the covenants relating to the top five loans by value. |  |

Commentary should specifically include an explanation of the reasons for each item reported as a borrowing not in accordance with the defined net debt item. The commentary should include:

* A description of the item
* A basic explanation of why the item has arisen
* An explanation of how the figure has been calculated. This should be sufficient for Ofgem to confirm the calculation during the visits if required.

Where you disagree with or have comments on tax/gearing clawback computation, explain those.

|  |
| --- |
| Comments |
|  |

**F8 – Reconciliation to Regulatory Accounts**

Commentary should specifically include an explanation of the reasons for each reconciling item. The commentary should include:

* A description of the reconciling item.
* A basic explanation of why the reconciling item has arisen.
* An explanation of how the figure has been calculated.
* Where International Financial Reporting Standards (IFRS) has been adopted, a statement of that fact listing the principle changes in the Accounts to opex and capex is required.
* Where costs are incurred by an affiliate and are not recharged to the licensee, state the name of the affiliate, the amount, the reasons why they are not recharged, justification for allowing such costs as efficient and why they should be allowed in computing RAV additions.
* Where any pension costs (ongoing employer contributions, deficit funding payments, PPF levies or pension scheme administration costs) are incurred by an affiliate and not recharged to the licensee, state the name of the affiliate, the amount, the reasons why they are not recharged, justification for allowing such costs as efficient and why they should be allowed as distribution costs of the licensee.

|  |
| --- |
| Comments |
|  |

1. Cost and volume performance: allocation and estimation methodologies

Guide length: 4-6 pages

For the worksheets listed below, DNOs should detail estimates, allocations or apportionments used in reaching the numbers submitted in the worksheets. This needs to be completed for all worksheets where an allocation or estimation technique was used. Not all tables will have used allocation or estimation methods to reach the numbers. Where this is the case, simply note “NA”.

Note: this only concerns the methodology and assumptions and is not about the systems in place to check their accuracy (that is for the NetDAR).

For the C1 Cost Summary sheet, detail estimates, allocations or apportionments used in reaching the numbers submitted (not covered by a specific table explanation), including:

* the allocation of shared indirect costs across DNOs in group;
* allocation of income relating to CAIs;
* allocation of income relating to business support costs (BSCs) and non-operational capex;
* indirect activity allocations to connections outside of price control; and
* indirect activity allocations to non-distribution (excluding connections).

|  |  |
| --- | --- |
| **Worksheet** | **Allocation/estimation methodologies** |
| C1 - Cost Summary |  |
| C2 - Connections Inside the Price Control |  |
| C3 - Physical Security |  |
| C4 - IT and Telecoms (Non-Op) |  |
| C5 - Property (Non Op) |  |
| C6 - Vehicles and Transport (Non Op) |  |
| C7 - STEPM (Non Op) |  |
| C8 - Remote Generation Opex |  |
| C9 - Core Closely Associated Indirects (CAI) |  |
| C10 - Wayleaves (CAI) |  |
| C11 - Vehicles and Transport (CAI) |  |
| C12 - Core Business Support |  |
| C13 - IT and Telecoms (Business Support) |  |
| C14 - Property Management (Business Support) |  |
| C15 - Atypicals Non Severe Weather |  |
| C16 - Smart Meter Outside the Price Control |  |
| C17 - Legacy Meters |  |
| C18 - De minimis |  |
| C19 - Other Consented Activity |  |
| C20 - Connections Outside the Price Control |  |
| C21 - Out of Area Networks |  |
| C22 - Pass-through |  |
| C23 - Other Non Activity Based Costs (NABC) |  |
| C24 - Related Party Margin |  |
|  |  |
| CV1 - Primary Reinforcement |  |
| CV2 - Secondary Reinforcement |  |
| CV3 - Fault Level Reinforcement |  |
| CV4 - New Transmission Capacity Charges (NTCC) |  |
| CV5 - Diversions |  |
| CV6 - Diversions Rail Electrification |  |
| CV7 - Asset Replacement |  |
| CV8 - Refurbishment no Secondary Deliverable Improvement (no SDI) |  |
| CV9 - Refurbishment with a Secondary Deliverable Improvement (SDI) |  |
| CV10 - Civil Works Condition Driven |  |
| CV11 - Operational IT and Telecoms |  |
| CV12 - Black Start |  |
| CV13 - BT 21st Century (BT21CN) |  |
| CV14 - Legal and Safety |  |
| CV15 - QoS and North of Scotland Resilience |  |
| CV16 - Flood Mitigation |  |
| CV17 - Rising and Lateral Mains (RLMs)  In particular report what calculation method has been used to determine km of mains length. |  |
| CV18 - Overhead Clearances |  |
| CV19 - Worst Served Customers (WSC) |  |
| CV20 - Visual Amenity |  |
| CV21 - Losses |  |
| CV22 - Environmental Reporting |  |
| CV23 - RIIO-ED1 High Value Projects (HVP) Summary |  |
| CV23a - RIIO-ED1 High Value Project 1 (HVP1) |  |
| CV23b - RIIO-ED1 High Value Project 2 (HVP2) |  |
| CV23c - RIIO-ED1 High Value Project 3 (HVP3) |  |
| CV23d - RIIO-ED1 High Value Project 4 (HVP4) |  |
| CV23e - RIIO-ED1 High Value Project 5 (HVP5) |  |
| CV24 - DPCR5 High Value Projects |  |
| CV25 - Moorside |  |
| CV26 - Faults |  |
| CV27 - Severe Weather 1 in 20 |  |
| CV28 - Occurrences Not Incentivised (ONIs) |  |
| CV29 - Tree Cutting |  |
| CV30 - Inspections |  |
| CV31 - Repairs and Maintenance |  |
| CV32 - Dismantlement |  |
| CV33 - Substation Electricity |  |
| CV34 - Smart Meter Intervention DNO |  |
| CV35 - Operational Training (CAI) |  |
| CV36 - Network Innovation Allowance (NIA) |  |
| CV37 - Network Innovation Competition (NIC) |  |
| CV38 - Innovation Funding Incentive (IFI) & Low Carbon Network (LCN) Fund |  |
| CV39 - Directly Remunerated Services (DRS) |  |
|  |  |
| V1 - Total Asset Movements |  |
| V2 - Cleansing |  |
| V3 - Connections |  |
| V4 - Other Asset Movements |  |
| AP1 - Age Profile |  |
|  |  |
| M1 - Flood Mitigation (site) |  |
| M2 - DPCR5 Worst Served Customer (WSC) Schemes |  |
| M3 - ED1 Worst Served Customer (WSC) Schemes |  |
| M4 - Enablers for RIIO-ED2 |  |
| M5 - Severe Weather |  |
| M6 - Metal Theft |  |
| M9a - Traditional Street Works (ex ante) |  |
| M9b - Permit & Lane Rentals (ex ante) |  |
| M9c - Permit & Lane Rentals (reopener) |  |
| M10 - Shetland (SSEH) |  |
| M11 - Subsea Cables |  |
| M12 - Moorside (ENWL) |  |
| M14 - Drivers |  |

Appendix 1: List of C&V worksheets and commentary requirements

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Worksheet | **Comment-ary required** | **Performance against allowance and drivers** | **Allocation/ estimation methodologies (at table level)** | **Table specific** |
| Cover Sheet | No |  |  |  |
| Changes Log | No |  |  |  |
| Data change log | No |  |  |  |
| Navigation | No |  |  |  |
| Check Sheet | No |  |  |  |
| I1 - PCFM Inputs 12-13 | No |  |  |  |
| I2 - PCFM Inputs Nominal | No |  |  |  |
| I3 - Licence values | No |  |  |  |
| I4 - Revenue Reporting Inputs | No |  |  |  |
| I5 - Theft Recovery | No |  |  |  |
| I6 - RPI | No |  |  |  |
| S1 - Summary of C1s | No |  |  |  |
| S2 - Summary of C1s (Real) | No |  |  |  |
| S3 - C1 Movements (Real) | No |  |  |  |
| S4 - C1 In Year Summary | No |  |  |  |
| F2 – Net Debt and Tax Clawback | Yes | No | No | Yes |
| F8 – Reconciliation to Regulatory Accounts | Yes | No | No | Yes |
|  |  |  |  |  |
| C1 - Building blocks |  |  |  |  |
| Load Related | Yes | Yes | No | No |
| Non Load Capex (excluding Non-Operational Capex) | Yes | Yes | No | No |
| Non-Operational Capex | Yes | Yes | No | No |
| High Value Projects | Yes | Yes | No | No |
| Network Operating Costs (NOCs) | Yes | Yes | No | No |
| Closely Associated Indirects (CAIs) | Yes | Yes | No | No |
| Business Support Costs (BSCs) | Yes | Yes | No | No |
| Other costs within the price control | Yes | Yes | No | No |
|  |  |  |  |  |
| C1 - Cost Matrix | Yes | No | Yes | No |
| C2 - Connections Inside the Price Control | Yes | No | Yes | No |
| C3 - Physical Security | Yes | No | Yes | No |
| C4 - IT and Telecoms (Non-Op) | Yes | No | Yes | Yes |
| C5 - Property (Non Op) | Yes | No | Yes | No |
| C6 - Vehicles and Transport (Non Op) | Yes | No | Yes | No |
| C7 - STEPM (Non Op) | Yes | No | Yes | Yes |
| C8 - Remote Generation Opex | Yes | No | Yes | No |
| C9 - Core Closely Associated Indirects (CAI) | Yes | No | Yes | No |
| C10 - Wayleaves (CAI) | Yes | No | Yes | No |
| C11 - Vehicles and Transport (CAI) | Yes | No | Yes | No |
| C12 - Core Business Support | Yes | No | Yes | No |
| C13 - IT and Telecoms (Business Support) | Yes | No | Yes | Yes |
| C14 - Property Management (Business Support) | Yes | No | Yes | No |
| C15 - Atypicals Non Severe Weather | Yes | No | Yes | Yes |
| C16 - Smart Meter Outside the Price Control | Yes | No | Yes | No |
| C17 - Legacy Meters | Yes | No | Yes | No |
| C18 - De minimis | Yes | No | Yes | No |
| C19 - Other Consented Activity | Yes | No | Yes | Yes |
| C20 - Connections Outside the Price Control | Yes | No | Yes | No |
| C21 - Out of Area Networks | Yes | No | Yes | No |
| C22 - Pass-through | Yes | No | Yes | No |
| C23 - Other Non Activity Based Costs (NABC) | Yes | No | Yes | No |
| C24 - Related Party Margin | Yes | No | Yes | Yes |
|  |  |  |  |  |
| CV1 - Primary Reinforcement | Yes | No | Yes | Yes |
| CV2 - Secondary Reinforcement | Yes | No | Yes | Yes |
| CV3 - Fault Level Reinforcement | Yes | No | Yes | Yes |
| CV4 - New Transmission Capacity Charges (NTCC) | Yes | No | Yes | No |
| CV5 - Diversions | Yes | No | Yes | Yes |
| CV6 - Diversions Rail Electrification | Yes | No | Yes | Yes |
| CV7 - Asset Replacement | Yes | No | Yes | No |
| CV8 - Refurbishment no Secondary Deliverable Improvement (no SDI) | Yes | No | Yes | Yes |
| CV9 - Refurbishment with a Secondary Deliverable Improvement (SDI) | Yes | No | Yes | No |
| CV10 - Civil Works Condition Driven | Yes | No | Yes | No |
| CV11 - Operational IT and Telecoms | Yes | No | Yes | Yes |
| CV12 - Black Start | Yes | No | Yes | Yes |
| CV13 - BT 21st Century (BT21CN) | Yes | No | Yes | Yes |
| CV14 - Legal and Safety | Yes | No | Yes | Yes |
| CV15 - QoS and North of Scotland Resilience | Yes | No | Yes | Yes |
| CV16 - Flood Mitigation | Yes | No | Yes | Yes |
| CV17 - Rising and Lateral Mains (RLMs) | Yes | No | Yes | No |
| CV18 - Overhead Clearances | Yes | No | Yes | Yes |
| CV19 - Worst Served Customers (WSC) | Yes | No | Yes | No |
| CV20 - Visual Amenity | Yes | No | Yes | No |
| CV21 - Losses | Yes | No | Yes | No |
| CV22 - Environmental Reporting | Yes | No | Yes | No |
| CV23 - RIIO-ED1 High Value Projects (HVP) Summary | Yes | No | Yes | No |
| CV23a - RIIO-ED1 High Value Project 1 (HVP1) | Yes | No | Yes | No |
| CV23b - RIIO-ED1 High Value Project 2 (HVP2) | Yes | No | Yes | No |
| CV23c - RIIO-ED1 High Value Project 3 (HVP3) | Yes | No | Yes | No |
| CV23d - RIIO-ED1 High Value Project 4 (HVP4) | Yes | No | Yes | No |
| CV23e - RIIO-ED1 High Value Project 5 (HVP5) | Yes | No | Yes | No |
| CV24 - DPCR5 High Value Projects | Yes | No | Yes | No |
| CV25 - Moorside | Yes | No | Yes | No |
| CV26 - Faults | Yes | No | Yes | Yes |
| CV27 - Severe Weather 1 in 20 | Yes | No | Yes | Yes |
| CV28 - Occurrences Not Incentivised (ONIs) | Yes | No | Yes | No |
| CV29 - Tree Cutting | Yes | No | Yes | Yes |
| CV30 - Inspections | Yes | No | Yes | No |
| CV31 - Repairs and Maintenance | Yes | No | Yes | No |
| CV32 - Dismantlement | Yes | No | Yes | No |
| CV33 - Substation Electricity | Yes | No | Yes | Yes |
| CV34 - Smart Meter Intervention DNO | Yes | No | Yes | No |
| CV35 - Operational Training (CAI) | Yes | No | Yes | No |
| CV36 - Network Innovation Allowance (NIA) | Yes | No | Yes | Yes |
| CV37 - Network Innovation Competition (NIC) | Yes | No | Yes | Yes |
| CV38 - Innovation Funding Incentive (IFI) & Low Carbon Network (LCN) Fund | Yes | No | Yes | No |
| CV39 - Directly Remunerated Services (DRS) | Yes | No | Yes | Yes |
|  |  |  |  |  |
| V1 - Total Asset Movements | Yes | No | Yes | No |
| V2 - Cleansing | Yes | No | Yes | No |
| V3 - Connections | Yes | No | Yes | No |
| V4 - Other Asset Movements | Yes | No | Yes | No |
| V5 - Volume Matrix | No |  |  |  |
| AP1 - Age Profile | Yes | No | Yes | No |
|  |  |  |  |  |
| M1 - Flood Mitigation (site) | Yes | No | Yes | No |
| M2 - DPCR5 Worst Served Customer (WSC) Schemes | Yes | No | Yes | No |
| M3 - ED1 Worst Served Customer (WSC) Schemes | Yes | No | Yes | Yes |
| M4 - Enablers for RIIO-ED2 | Yes | No | Yes | Yes |
| M5 - Severe Weather | Yes | No | Yes | Yes |
| M6 - Metal Theft | Yes | No | Yes | Yes |
| M7 - Protection Summary | Yes | No | No | Yes |
| M8 - Link Boxes | Yes | No | No | Yes |
| M9a - Traditional Street Works (ex ante) | Yes | No | Yes | No |
| M9b - Permit & Lane Rentals (ex ante) | Yes | No | Yes | Yes |
| M9c - Permit & Lane Rentals (reopener) | Yes | No | Yes | Yes |
| M10 - Shetland (SSEH) | Yes | No | Yes | No |
| M11 - Subsea Cables | Yes | No | Yes | No |
| M12 - Moorside (ENWL) | Yes | No | Yes | No |
| M13 - Uncertainty Mechanism Information | No |  |  |  |
| M14 - Drivers | Yes | No | Yes | Yes |
| M15 - Modern Equivalent Asset Value (MEAV) | No |  |  |  |
| M16 - Forecasts | Yes | No | No | Yes |
| M17 – Forecasts TOTEX | Yes | No | No | Yes |

Appendix 2: RAG rating guidance



Appendix 3: List of C&V worksheets in eight main cost categories

|  |  |
| --- | --- |
| **Cost category** | **Associated tables** |
| **Load-related** | C2 - Connections Inside the Price Control  CV1 - Primary Reinforcement  CV2 - Secondary Reinforcement  CV3 - Fault Level Reinforcement  CV4 - New Transmission Capacity Charges (NTCC) |
| **Non Load Capex (excluding Non-Operational Capex)** | CV5 - Diversions  CV6 - Diversions Rail Electrification  CV7 - Asset Replacement  CV8 - Refurbishment no Secondary Deliverable Improvement (no SDI)  CV9 - Refurbishment with a Secondary Deliverable Improvement (SDI)  CV10 - Civil Works Condition Driven  CV11 - Operational IT and Telecoms  CV12 - Black Start  CV13 - BT 21st Century (BT21CN)  CV14 - Legal and Safety  CV15 - North of Scotland Resilience  CV16 - Flood Mitigation  CV17 - Rising and Lateral Mains (RLMs)  CV18 - Overhead Clearances  CV21 – Losses  CV22 – Environmental Reporting  C3 - Physical Security |
| **High Value Projects (HVPs)** | CV23a-e - RIIO-ED1 High Value Project 1-5  CV24 - DPCR5 High Value Projects |
| **Network Operating Costs (NOCs)** | CV26 - Faults  CV27 - Severe Weather 1 in 20  CV28 - Occurrences Not Incentivised (ONIs)  CV29 - Tree Cutting  CV30 – Inspections  CV31 - Repairs and Maintenance  CV32 – Dismantlement  CV33 - Substation Electricity  CV34 - Smart Meter Intervention DNO  C8 – Remote Location Generation |
| **Closely Associated Indirects (CAIs)** | C9 - Core Closely Associated Indirects (CAI)  C10 - Wayleaves (CAI)  C11 - Vehicles and Transport (CAI)  CV35 - Operational Training (CAI) |
| **Business Support Costs (BSCs)** | C12 - Core Business Support  C13 - IT and Telecoms (Business Support)  C14 - Property Management (Business Support |
| **Non-Operational Capex** | C4 - IT and Telecoms (Non-Op)  C5 - Property (Non Op)  C6 - Vehicles and Transport (Non Op)  C7 - STEPM (Non Op) |
| **Other costs within the Price Control** | C15 – Atypicals Non Severe Weather.  CV19 - Worst Served Customers (WSC)  CV20 – Visual Amenity  CV36 - Network Innovation Allowance (NIA)  CV37 - Network Innovation Competition (NIC)  CV38 - Innovation Funding Incentive (IFI) & Low Carbon Network (LCN) Fund |

1. The forecast costs are current forecasts presented in M17 of the C&V pack and not business plan forecasts. [↑](#footnote-ref-2)