



**Scottish & Southern**  
Electricity Networks



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Louise Deighan  
Ofgem  
Commonwealth House  
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32 Albion Street,  
Glasgow,  
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19 March 2018

Dear Louise,

### **Proposal to make modifications to the Regulatory Instructions and Guidance**

Thank you for the opportunity to provide comments on the proposed modifications to the Regulatory Instructions and Guidance (RIGs) and Electricity Distribution Reporting Packs.

SSEN has been working with Ofgem and the other DNOs to ensure that the proposed modifications to the RIGs and Reporting Packs provide a comprehensive overview of DNO performance, to the level of granularity required, while reducing unnecessary reporting in certain reporting packs.

Overall, SSEN is supportive of Ofgem's proposed modifications to the RIIO-ED1 Regulatory Instruction Guidance and Reporting Packs in this consultation. We have reviewed the RIGs Annexes, Reporting Packs and Commentary documents, and SSEN's detailed comments are provided in Appendix 1.

If you have any questions on our view or would like to discuss this further, then please do not hesitate to contact me.

Yours sincerely,

David Manson  
Network Regulation

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## Appendix 1

### RIGs Annexes

#### Annexes A, B, C, D, E, F, G, J

We have no comment as this has been reviewed in the appropriate working group.

### Reporting Packs

#### Cost and Volumes Reporting Pack

We have no comment as this has been reviewed in the appropriate working group.

#### Connections Reporting Pack

SSEN have recently been granted permission by Ofgem to conduct a 3-year trial to offer Part Funded Reinforcement (PFR) which we had originally intended to report in the CR10 – ICP PFC tab in the Connection Reporting Pack. However, we fully agree with the objectives of the new proposed reporting format, to create a more streamlined pack with more concise information, meeting Ofgem requirements. We believe that reporting table CC4 –Completed Summary is a more appropriate alternative and propose to report the PFR connection jobs within this. This will allow us to capture costs as in any other connection job and report the detailed breakdown of the PFR connection jobs separately to Ofgem in a focused and succinct format to that of CR10. This will capture the relevant costs, and may develop through learning and Ofgem engagement as the trial progresses. We will continue to feed this learning into future developing of the Connections Reporting Pack.

#### Environment and Innovation Reporting Pack

We have no comment as this has been reviewed in the appropriate working group.

#### QOS Interruptions Stage Data Reporting Pack

We have no comment as this has been reviewed in the appropriate working group.

#### Revenue Reporting Pack

We have no comment as this has been reviewed in the appropriate working group.

#### Secondary Deliverables Reporting Pack

We have no comment as this has been reviewed in the appropriate working group.

SLC 12, 15 and 15A Reporting Pack

We have no comment as this has been reviewed in the appropriate working group.

**Commentary Packs**

Connections Commentary

We have no comment as this has been reviewed in the appropriate working group.

Strategic Commentary

We have no comment as this has been reviewed in the appropriate working group.