

By email:
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Date
5th April 2019
Contact / Extension
Lynne Bryceland
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Dear Anthony

Notice proposing modifications to the Regulatory Instructions and Guidance (RIGs) for RIIO-ET1 (version 6.1)

This response is not confidential.

This response is from SP Transmission plc (SPT) the onshore Transmission Owner (TO) for the South of Scotland. We welcome the opportunity to provide comment on the proposed RIGS modifications which will take effect in April 2019. We note that the data submitted for the 2018/19 reporting year will use the RIGs as modified.

We very much support the RIIO Transmission team's desire to ensure that regulatory reporting is maintained effectively. We would suggest the implementation of 'modification windows' for regulatory guidance, so that Ofgem can only change regulatory reporting guidance documents once a year within a specified timeframe. This will ensure that licensees are afforded the appropriate time to roll out any new regulatory rules to their businesses and make any necessary system changes. We would also request that any timeframes are set so that the regulatory guidance is finalised in advance of the next relevant reporting year. This will reduce a significant amount of administration for both Ofgem and the TOs as well as prevent any errors as a result of retrospective changes.

We support all of Ofgem's proposals but have provided some comments, below, on the minor detail:

- We acknowledge the removal of tables 1.4/1.5 and related commentary from the pack.
- We acknowledge the temporary suspension of tables noted in the covering letter for 2018/19. As such, we ask Ofgem to confirm that - as these tables remain in the pack - we are not expected to populate them or provide any commentary with them.
- We note that the RRP tables are still required to provide a rolling 8-year forecast, which extends to year one of RIIO-T3. As such, much of the RRP commentary, where relevant (i.e. future forecasts), will refer to the Business Plan narrative that supports the RIIO-T2 Business Plan submission to CCG on 1st July 2019 (i.e. Business Plan 'core' of 200 pages, BPDT, and appendices).

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Please don't hesitate to get in touch with me, should you have any questions in relation to this response.

Yours sincerely

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Transmission Policy and Licence Manager**

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