

RIIO-ED1 Team
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Thursday 29 August 2019

(submitted by email)

Dear RIIO-ED1 Team,

Response to Ofgem Enhanced Physical Site Security Costs, High Value Projects and Rail Electrification Reopeners Consultations

We value the opportunity to respond to the consultations on the various reopeners in the RIIO-ED1 programme. It is important that DNOs are given the opportunity to apply for additional funding if required during the fixed price control period.


Our response to the Streetworks Reopener consultation is not included within this letter and has been provided in a separate submission.

Below are our views on some of the specific reopener projects that have been submitted for the current reopener window.

- **Enhanced Physical Site Security Costs**
 - We agree that NPg's proposed costs are compliant with the licence and are based on actual or efficient expenditure. It is right that DNOs should be able to recover efficiently incurred costs resulting from fulfilling their obligations under instruments such as the CPNI security strategy.
- **Rail Electrification Costs**
 - The costs as requested by SSEN (SEPD) for the Great Western railway electrification have been incurred appropriately, with additional efficiencies gained for diversions which are yet to be built.
- **High Value Projects**
 - SSEN (SHEPD) Pentland Firth East Subsea Cable Replacement: We agree that further analysis should be done to establish the correct rating of the cable. However we agree in principle that a network upgrade is required in this case based on the information presented.
- **Other projects**
 - We agree with Ofgem's views on the other projects which have not been accepted.

I hope these comments are helpful. Please do not hesitate to contact me or Tom Selby (07824 321980) if you want to discuss any aspect of this response.

Yours sincerely

A handwritten signature in black ink, reading "Paul Auckland". The signature is written in a cursive style with a large initial 'P' and a long, sweeping underline.

Paul Auckland

Head of Economic Regulation