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Ofgem
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5 June 2020

Dear Jack

Proposal to modify the Regulatory Instructions and Guidance (RIGs) for RIIO-ED1

Thank you for the opportunity to respond to the above Notice, dated 30 April 2020. This letter should be treated as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. It is not confidential and may be published on Ofgem's website.

We have identified a small number of items of feedback, as set out below:

- **Guaranteed Standards of Performance Reporting Pack v6.0**
 - The Main tab includes data columns for the years 2016, 2017, 2018 and 2019. While we understand this is standard RIIO-ED1 template formatting, we would suggest that these columns are deleted as there is no requirement to populate the template with historical data.
 - Also on the Main tab, under EGS2 – Normal Weather, cell D29 instructs DNOs to report the “number of additional 12 hour bands exceeded where a premises was affected by an unplanned interruption where the supply was not restored within subsequent 12 hour bands (excluding Category 1/2/3 severe weather conditions and EGS2B)”. It would be helpful if the wording of this cell could be expanded to include a cross-reference to the new paragraph 3.13 in the RIIO-ED1 Regulatory Instructions and Guidance: Annex F – Interruptions v6.0. This also applies to cells D36 (Domestic Premises (excluding PSR)), D44 (Non-Domestic Premises) and D52 (PSR Customers).

By way of a worked example, the content of cell D29 would read:

Number of additional 12 hour bands exceeded where a premises was affected by an unplanned interruption where the supply was not restored within subsequent 12 hour bands (excluding Category 1/2/3 severe weather conditions and EGS2B). Further detail on how to count the number of additional 12 hour bands is provided in v6.1 of Annex F of the RIGs, paragraph 3.13.

- RIIO-ED1 Regulatory Instructions and Guidance: Annex F – Interruptions v6.0.
 - In paragraph 3.11 (page 38), the word ‘of’ should be inserted in the following sentence:
A “pass rate” cannot be calculated for EGS2 and EGS4 because the DNO does not know the total number of failures on which to base the calculation.

I hope that you will find our comments helpful. If you have any questions regarding our response, please do not hesitate to contact Paul Measday in the first instance.

Yours sincerely



James Hope
Head of Regulation & Regulatory Finance
UK Power Networks

Copy: Paul Measday, Regulatory Reporting & Compliance Manager, UK Power Networks