

By email: Jack.Ambler@ofgem.gov.uk.

Your ref

Our Ref

Date

5th June 2020

Contact / Extension

Stephanie Anderson

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Dear Jack

Notice proposing modifications to Annex F of the Regulatory Instructions and Guidance (RIGs) for RIIO-ED1 (version 6.0)

We welcome the opportunity to provide comment on the proposed RIGS modifications to Annex F which will take effect in June 2020. We note that the data submitted for the 2019/20 reporting year will use the RIGs as modified.

We support the majority of changes made, however would like to take this opportunity to highlight the following issues:

1. **'Main' Worksheet - Row 506 Total Value of EGS Payments Made:** The formula in cell H506 includes cells H498 (NCPMt) and H502 (SWPMt). These cells calculate all GS payments made *including ex-gratia under GS2/GS11 and goodwill in the case of severe weather*. We believe the formula should look at GS payments only. At present, should the two summary rows (506 and 507) be added together to arrive at a 'total payments made' figure, then the GS2/GS11 ex-gratia payments would be double counted as well as severe weather goodwill payments.
2. **'Main' Worksheet:** The latest version of the template includes columns for 2016 onwards. Is it Ofgem's expectation that these columns will be updated with the historical data already submitted in previous years?
3. **'Main' Worksheet Row 23:** During the review process, we anticipated that the link to IIS for 'GS2 number of premises affected by unplanned interruptions' would link to a specific cell or metric title to ensure the correct value was selected. However, the new template

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only states 'from the IIS template'. Can Ofgem please provide more specific detail on this point?

This point is also relevant for the following standards: GS11A, B, C, GS2B and GS4.

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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