

Jack Ambler
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

5 June 2020

Dear Jack,

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

Scottish and Southern Electricity Networks (SSEN) welcomes the opportunity to respond to the above consultation.

Overall, SSEN is supportive of Ofgem's proposed modifications to Annex F of the Regulatory Instructions and Guidance. We recognise and appreciate the work that has gone into the proposed template and guidance which provides clarity on reporting requirements for the Guaranteed Standards of Performance. We do however seek clarity on certain aspects of EGS5 – Voltage complaints. Our comments are included in Appendix 1.

In addition to the proposed changes, we note Ofgem's intention to review the wording of the Statutory Instrument - Electricity (Standards of Performance) Regulations 2015 in the future, as per discussions at the working groups. We would welcome the opportunity to be involved in the drafting of the revised Regulations.

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

Yours Sincerely,

Louise Deighan
Network Regulation

Appendix 1

EGS5 – Voltage Complaints

- On line 410 of the reporting template, we are required to report the number of voltage complaints. Cell D410 notes the reason when we would be required to report under voltage complaints as set out in the paragraph below. However, from discussion in the working group, there appears to be confusion as to whether this trying to capture potential voltage issues based on information available at the first point of contact by the customer, or actual voltage issues e.g. as revealed following further investigation or any intervention in relation to an incident on any network. We are concerned the former would potentially overstate the magnitude of voltage issues and believe the focus should be on identifying and recording unresolved complaints. We consider further clarity is needed to ensure drafting reflects intent.

Number of reported voltage complaints (customer reports of suspected voltage operating outside of statutory limits or where, from that notification, the DNO might reasonably expect the supply to be or have been outside the statutory limits) and the DNO was not able to explain that the situation was caused either by (i) a reportable or non-reportable (as defined by IIS) incident on its network; (ii) an incident on the National Electricity Transmission System or (iii) an incident on another DNO's network.

- When we are contacted by a customer that considers their supply is given at a voltage outside the limits of the permitted variations, we would attend site, on most occasions, as an emergency visit, to perform a safety check. Please can you clarify if this initial visit fulfils the making and keeping of an appointment section of the standard, for the purposes of recording in the template (Cells D413/414). Alternatively, if these initial visits are to be ignored for EGS5 reporting, please could cell D413 be updated to include the narrative "Number of occasions on which a "subsequent/secondary/remedial" visit was deemed necessary.