

Jack Ambler
Ofgem
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E14 4PU

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

A handwritten signature in black ink, appearing to read 'James Hope', followed by a stylized flourish.

James Hope
Head of Regulation & Regulatory Finance
UK Power Networks

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