

Steven McMahon  
Deputy Director, Electricity Distribution and Cross Sector Policy  
Ofgem  
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32 Albion Street  
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26 May 2020

Dear Steve

## **Proposal to make modifications to the Regulatory Instructions and Guidance (Pensions RIGs and RFPR)**

Thank you for the opportunity to respond to the above Notice dated 29 April. Our response should be treated as consolidated 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 can be published on your website.

We have only identified a small number of items of feedback which we have set out below:

- RFPR tables
  - Column Q of tab R8a (Net Debt) should be a RPI number to two decimal places and not a percentage
- Pensions RIGs tables
  - The Paragraph 6.20 adjustments tab requires additional data entry columns – at the previous triennial submission three columns (one for each year of source data) were provided
- Pensions guidance
  - In the Foreword we agree with the use of NWO as an abbreviation
  - In paragraph 1.1 (b) on page 24, where you asked whether “and” or “or” was required, we believe “and” is the correct option
  - From the first landscape page in the document (page 14) the page numbering goes awry
  - Diagrams on the landscape pages need to be checked as formatting means some text is being chopped off
  - There is yellow highlighting left on para 22.1 on page 25

If you have any queries on the above please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'James Hope', with a stylized flourish at the end.

James Hope  
Head of Regulation & Regulatory Finance  
UK Power Networks

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