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27 May 2020

Dear Varun,

Notice proposing modifications to the Regulatory Financial Performance Reporting (RFPR) and Pension Regulatory Instructions and Guidance (RIGs) for RIIO1

Thank you for the opportunity to comment on the 2020 Regulatory Financial Performance Reporting (RFPR) and Pension Regulatory Instructions and Guidance (RIGs). Our comments are set out below.

Pension RIG

- The starting point for development of the 2020 RIG does not seem to entirely coincide with the Excel template released in 2017. This has resulted in data provision discrepancies on worksheet 6.20 in the Excel workbook.
- Regarding Section E on the P1.2 PDAM Actuary provided data worksheet, some of the row headers refer to "post cut-off date" only but for each row total, post and pre cut-off date are all shown.
- The calculations in row 8 on worksheets P1.6 and P2.6 need review in the context of the 2017 submission. Given the changes for this year's submission, part of the calculation will no longer work.

RFPR RIG - We have no further comment on either the RFPR Excel workbook or the associated RIG guidance document.

If you have any questions regarding the above, please do not hesitate to contact Colin Ross (Pensions) (on 0843 311 5042) or myself.

Yours sincerely



Dave Ball
Regulatory Finance Manager

