

To: Electricity North West Ltd (ENWL) Northern Powergrid (Northeast) plc (NPgN) Northern Powergrid (Yorkshire) plc (NPgY) London Power Networks plc (LPN) South Eastern Power Networks plc (SPN) Eastern Power Networks plc (EPN) SP Distribution plc (SPD) SP Manweb plc (SPMW) Scottish Hydro Electric Power Distribution plc (SSEH) Southern Electric Power Distribution plc (SSES) Western Power Distribution (West Midlands) plc (WMID) Western Power Distribution (East Midlands) plc (EMID) Western Power Distribution (South Wales) plc (SWALES) Western Power Distribution (South West) plc (SWEST)

> Electricity Act 1989 Section 11A(1)(a)

Modification of the Special Licence Conditions (also known as the Charge Restriction Conditions) and the ED1 Price Control Financial Model held by the above licensees

- The licensees listed above are holders of electricity distribution licences ('the Licences') granted or treated as granted under section 6(1)(c) of the Electricity Act 1989 ('the Act').
- 2. Under section 11A(2) of the Act, the Gas and Electricity Markets Authority ('the Authority')¹ gave notice on 1 July 2020 ('the Notice')² that it proposed to modify the Special Licence Conditions and the ED1 Price Control Financial Model in the manner set out at Annex 2 of the Notice.
- 3. Under section 11A(1) of the Act we hereby modify the Special Licence Conditions and the ED1 Price Control Financial Model. The modifcations are set out in the attached Schedule 1 and will take effect from 3 October 2020.
- 4. This document gives notice of the reasons for our decision as required by section 49A(2) of the Act.

Reasons for our Decison

- 5. In accordance with section 11A(4)(b) of the Act a copy of the Authority sent a copy of the Notice to the Secretary of State. The Secretary of State has not directed that that the proposed modifications should not be made.
- 6. The Notice stated that any representations with respect to the proposed modifications must be made to the Authority on or before 29 July 2020. We received four responses to the Notice. We have published the non-confidential responses on our website alongside this Notice.³

 $^{^{\}rm 1}$ The terms "the Authority", "we" and "us" are used interchangeably in this document.

² <u>https://www.ofgem.gov.uk/publications-and-updates/electricity-distribution-notice-proposed-licence-modifications-special-licence-conditions-electricity-distribution-licence-and-ed1-price-control-financial-model ³ <u>https://www.ofgem.gov.uk/publications-and-updates/electricity-distribution-notice-proposed-licence-modifications-special-licence-conditions-electricity-distribution-licence-and-ed1-price-control-financial-model</u> modifications-special-licence-conditions-electricity-distribution-licence-and-ed1-price-control-financial-model</u>

7. The responses broadly agreed with the proposed modifications and made comments in respect of some of the proposed changes. A summary of the comments received and our response to those are set out in Annex 1.

Changes to the proposed modifications

8. We have considered the responses received and decided it is necessary to make a number of minor changes to the proposed modifications set out in the Notice. The changes are highlighted in the attached Schedule 1. The changes are required to correct minor typographical errors in the proposed modifications which were identified in the consultation responses.

Effect of the modifications

- 9. The effect of the modifications will be to improve the clarity of the licence conditions and correct mistakes in the previous drafting. The modifications correct mistakes in the licence conditions including typographical errors, incorrect cross-references and formatting errors. A small number of the modifications are being made in order to reflect a change in circumstances from what was anticipated at the start of the price control.
- 10. The modification will also have the effect of updating the ED1 Price Control Financial Model to reflect the change to the capitalisation rate.

Appeal

- 11. An application for permission to appeal our decision to modify the Licesees may be made to the Competition and Markets Authority (CMA) under section 11C of the Act.
- 12. Rule 5.7 of the Energy Licence Modification Appeals: Competition and Markets Authority Rules⁴ requires the appellant to send a non-sensitive notice setting out the matters required in Rule 5.2. to any relevant licence holders who are not parties to the appeal.
- 13. Section 11A(10) of the Act sets out the meaning of 'relevant licence holder'. Schedule 2 provides a list of the relevant licence holders for the purposes of this modification.

James Veaney Head of Electricity Distribution Policy, Systems and Networks Duly Authorised on behalf of the Gas and Electricity Markets Authority 7 August 2020

⁴ CMA 70

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/655601/energy-licence-modification-appeals-rules.pdf



Annex 1- Consultation Responses

Condition	Paragraph	Change proposed in Notice	Summary of responses	Ofgem response
1A	1	"Terms" should be lower case as it is not a defined term and for consistency with its use elsewhere.	N/A	N/A
1B	7	Change to: (b) charges payable by the licensee to another Electricity Distributor in respect of units transported from that person's network.	N/A	N/A
2В	41	N/A	The following spelling errors were identified in SSEH's licence: "SNESRCE t-2 Means the amount of the Shetland New Energy Soultion Residual Costs allowance in Regulatory Year t-2, and is represented by the amount set out in Appendix 9 of this condition that applies to the licensee"	The spelling errors have been corrected. The text now reads: "SNESRCE t-2 Means the amount of the Shetland New Energy Solution Residual Costs allowance in Regulatory Year t-2, and is represented by the amount set out in Appendix 9 of this condition that applies to the licensee"
2B	22 and 25	Remove the references to the SMCt and SMITt values as being zero for 2023/24 and 2024/25.	A question was raised regarding when the review of SMIT costs in 2020/21 identified in the licence would take place.	We are still planning to carry out this review in the 2020/21 reporting year. We will contact DNOs separately with further details.
2J	11	Change to "Customers" as it is a defined term.	N/A	N/A
2J	11	Change "is" to "are as "Returned LCN Fund Royalties" is plural.	N/A	N/A
ЗА	11	Change to "Regulatory Year" as it is a defined term.	N/A	N/A
3A	23	Change to "Regulatory Year" as it is a defined term.	N/A	N/A

3В	5	Totex Incentive Mechanism Adjustments are applied under the Annual Iteration Process for the ED1 Price Control Financial Model and calculation of these adjustments uses the Totex Capitalisation Rate Specified for the licensee in Appendix 1 of this condition which: for all licensees other than SSEH applies for each Regulatory Year in the Price Control Period and for SSEH applies in relation to the relevant Regulatory Year, and is a fixed value contained in the ED1 Price Control Financial Model	One respondent noted that, while they believe that amending capitalisation rates should be avoided where possible, they consider that Ofgem should carefully consider whether such a change is in the interests of both consumers and DNOs.	The change in capitalisation rate reflects the expectation that there would be an enduring solution reached for Shetland by this point, however as this has not happened, the capitalisation rate for the last four years of the price control has been amended to reflect the rate at the beginning of the price control. The text in 3B.5 now reads as: 3B.5 Totex Incentive Mechanism Adjustments are applied under the Annual Iteration Process for the ED1 Price Control Financial Model and calculation of these adjustments uses the Totex Capitalisation Rate specified for the licensee in Appendix 1 of this condition which for all licensees applies for each Regulatory Year in the Price Control Period, and which is a fixed value contained in the ED1 Price Control Financial Model
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3В	16	Add a comma after "Adjustment" due there being a comma after "will".	One respondent noted that this change had not been made to the WPD licences.	We have now added a comma after "Adjustment" in this paragraph for the WPD licences; this was an oversight in the Notice. The text for 3B.16 now reads: "Where the Authority directs any revised actual Totex values for Regulatory Years earlier than Regulatory Year t, the effect of using those revised values in the Annual Iteration Process for the ED1 Price Control Financial Model will, subject to a Time Value of Money Adjustment, be reflected in the calculation of the term MOD for the licensee for Regulatory Year t and will not have any retroactive effect on a previously directed value of the term MOD"
3В	19	Change to "Regulatory Year" as it is a defined term.	N/A	N/A
3B	Appendix 1	For SSEH, in the column "Totex Capitalisation Rate (%)" all of the text after the figure "62.00" should be deleted.	N/A	N/A
3D	8(b)	Change to "Customers" which is a defined term whereas "electricity consumers" is not.	N/A	N/A

			One respondent agreed with the	Wording of 3E.8 changed to the following:
3E	8	Continue the formula in this paragraph to Regulatory Year 2021/22 and 2022/23.	change outlined in the notice, but proposed different wording that should be used in order to correctly use 't-2'.	"For each Regulatory Year t-2 of the Price Control Period the annual value of SMAE will be derived in accordance with the following formula:"

3Е	9	SMAE should not be set to zero in 2012/22.	One respondent suggested that the wording of 3E.9 should be replaced with with 'Not used', rather than be removed altogether, to retain paragraph consistency. They also suggested that the wording of the title for Part B should be amended to read as "Part B: Determination of SMAEt values for the Regulatory Years 2015/16 to 2022/23 (annual value)"	We agree with the suggestion to replace the wording of 3E.9 with 'Not used', rather than remove the paragraph altogether. The text of 3E.9 now reads: "Not used." We also agree with the suggested wording for the title to Part B, which now reads: "Part B: Determination of SMAEt values for the Regulatory Years 2015/16 to 2022/23 (annual value)" We have updated the paragraph numbering of subsequent paragraphs in CRC 3E to correct numbering references. For example, paragraph 3E.11 now reads: "3E.11 The first Regulatory Year t-1 for which the Authority will issue a direction under paragraph 3E.10 is Regulatory Year 2015/16, for the purposes of the Annual Iteration Process that will take place by 30 November 2016."
3E	Part C	The true up process should not happen in 2022/23. Paragraphs 3E.9 and 3E.10, and Table 2, can be removed (and section/paragraph references in subsequent sections updated accordingly).	N/A	N/A

3Е	11	Add a comma after "will" due there being a comma after "thereafter".	One respondent suggested that we should remove comma after 'thereafter'	We have removed comma after 'Regulatory Year t-1', so 3E.10 (as it now is, following the change to 3E.9 as outlined above) now reads: "3E.10 Subject to paragraphs 3E.11 and 3E.12, the Authority will, by 30 November in each Regulatory Year t- 1 or as soon as reasonably practicable thereafter, issue a direction, in accordance with the provisions of Part D of this condition, specifying a revised SMAE value for Regulatory Year t-2."
3F	5	Change to: for each Regulatory Year are, as at 1 April 2015 (that is, before any relevant adjustments have been made under the provisions of this condition) respectively zero.	N/A	N/A
3F	8	remove reference to appendix 5.	Several respondents noted that it is unclear why only the references to material amounts are being removed only for Link boxes.	We agree that Appendix 5 and references to it contained within CRC 3F should be retained. The wording of 3F.8(c) now reads (apart from WPD's licences, which did not have a reference to Appendix 5): "(c) for all uncertain cost activities other than High Value Project Costs, constitutes a material amount as specified for the licensee in Appendix 2, 3, 4 or 5 (as the case may be) to this condition"

3F	9(b)	N/A	An update is needed to UKPN's licences to allow the Authority to make adjustments to years other than those currently on the face of the licence.	Change made to UKPN's licences to reflect this, so that 3F.9(b) now reads: "(b) the Authority not propose greater negative adjustments to such allowed levels of expenditure than those set out in Appendix 5 of this condition"
3F	10	Add new paragraph (c) ((b) for WPD's licences) to include window for DNOs to submit for logged up costs under SSWC: "; and (c) for Specified Street Works Costs, in addition to the application window under paragraph 3F.10(b) the application window that opens on 1 September 2023 and closes on 30 September 2023."	For SHEPD, this should reference 3F.11(c). WPD licences should be consistent with other DNOs.	Change made to SHEPD to correct the reference, so that 3F.11(d) now reads: "for Specified Street Works Costs, in addition to the application window under paragraph 3F.11(c) the application window that opens on 1 September 2023 and closes on 30 September 2023." For WPD's licences, 3F.10 now reads: "(a) In respect of Rail Electrification Costs, the application window that opens on 1 May 2022 and closes on 31 May 2022; and (b) for Specified Street Works Costs, the application window that opens on 1 September 2023 and closes on 30 Steptember 2023"

3F	12 (13 in some licences)	Amend to clarify that four month deadline for Authority's determination may move where further information requested under paragraph 3F.13 "Where a proposal has been duly made by the licensee under paragraph 3F.8, the Authority will, subject to paragraph 3F.13, determine within four months of the close of the application window any revisions that are to be made to the licensee's allowed level of expenditure "	One respondent noted that a change has not been made to give the Authority the opportunity to trigger a reopener at the end of the price control for Link Boxes.	Change to give the Authority the opportunity to trigger a reopener at the end of the price control for Link Boxes may be consulted on separately.
3F	13 (14 in some licences)	" (b) requesting the licensee to provide that further or reformatted information or analysis, the Authority will have a period of four months the date specified in the Notice for receipt of that further information or analysis to determine any revisions that are to be made to the licensee's allowed level of expenditure for the uncertain cost activities concerned and the Regulatory Years to which those revisions relate in accordance with the methodologies set out in the sections of chapter 7 of the ED1 Proce Control Financial Handbook set out above at paragraph 3F.12."	Correction of the spelling 'Authority' in some licences. Alternative wording suggested to avoid the Authority being able to avoid performing the assessment.	Spelling mistake corrected in 3F.13 (or 14 for some licences), so that it now reads: "the Authority will have a period of four months from the date specified in the Notice for receipt of that further information or analysis to determine any revisions that are to be made to the licensee's allowed level of expenditure for the uncertain cost activities concerned and the Regulatory Years to which those revisions relate in accordance with the methodologies set out in the sections of chapter 7 of the ED1 Price Control Financial Handbook set out above at paragraph 3F.12." No change has been made to the remaining text of the proposed modification.

3F	22	Add new part (c) to note the date for directing revised SSWC values: "; and (c) 30 November in Regulatory Year 2023/24 in respect of an application for Specified Street Works Costs made during the application window available under paragraph 3F.10 (b). For WPD's licensees, add a new part (b) to note the date for directing revised SSWC values: "; and (b) In respect of Specified Street Works Costs, revised PCFM Variable Values for the licensee will be directed by the Authority by 30 November in Regulatory Year 2023/24."	The dates specified do not interact correctly with the proposed dates in the consultation on the Street Works closeout methodology, and should be altered to give the Authority time to conduct the assessment. 3F.22(c) should reference 3F.10(c) instead of 3F.10 (b)	Dates specified in the licence updated to align with the proposal in the Street Works closeout methodology (30 November 2024/25). 3F.22(c) reference corrected. The text of 3F.22(c) now reads: "30 November in Regulatory Year 2024/25 in respect of an application for Specified Street Works Costs made during the application window available under paragraph 3F.10(c)" For UKPN's licences, the text of 3F.23(c) now reads: "30 November in Regulatory Year 2024/25 in respect of an application for Specified Street Works Costs made during the application window available under paragraph 3F.11(c)" For SHEPD's licence, the text of 3F.35(f) now reads: "(f) 30 November in Regulatory Year 2024/25 in respect of an application for Specified Street Works Costs made during the application window available under paragraph 3F.11(d)" For WPD's licences, the text of 3F.22(b) reads: "(b) In respect of Specified Street Works Costs, revised PCFM Variable Values for the licensee will be directed by the Authority by 30
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		November in Regulatory Year

3F	Appendix 5	Remove material amount box and references to this.	It is not clear why only the references to material amounts are being removed only for Link boxes.	Appendix 5 has been reinstated for all licences (apart from WPD's licences, which did not have an Appendix 5), to now read: "APPENDIX 5: The material amount for Link Box Costs for each licensee (£m, in 2012/13 prices) (see paragraph 3F.8) Material amount
				ENWL 6.21 NPgN 4.49 NPgY 5.86 SPD 6.47 SPMW 5.82 SSES 8.42" For UKPN's licences, the text of Appendix 5 now reads:
				"Table 1The material amount for Link BoxCosts for each licensee(£m, in 2012/13 prices)(see paragraph 3F.8)Material amountLPN 7.44SPN 6.52EPN 9.72
				Table 2Maximum negative adjustments(£m, in 2012/13 prices)(see paragraphs 3F.9)2015/162016/17LPN4.014.01SPN5.345.34

				EPN 3.64 3.64" For SSEH, the text of Appendix 5 now reads: "APPENDIX 5: The material amount for Link Box Costs for SSEH (£m, in 2012/13 prices) (see paragraphs 3F.30) Material amount SSEH 4.54"
3G	11 (c) and (d)	Provide consistency with the text in CRC 5G by updating the text in part (c) of 3G.11 to align with CRC 5G: "(c) net of any customer contributions against gross expenditure which changes the Specific Customer Funded Reinforcement Percentage Band specified in Table 2 at paragraph 5G.3; and" Update the text in part (d) of 3G.11 for clarity, to read: "(d) net of an adjustment above the level specified in the Final Determination for the licensee for any expenditures avoided, or that may reasonably be expected to be or to have been avoided, as a result of demand-side response or the use of other non-traditional solutions to load related issues;"	Several respondents agreed with the changes, but the wording should be updated to accurately reflect the decision made in Annex A of the RIIO-ED1 closeout methodology.	Wording updated to reflect the decision made in Annex A of the RIIO-ED1 closeout methodology, so that 3G.11(d) now reads: "(d) net of an adjustment for any expenditures avoided, or that may reasonably be expected to be or to have been avoided, as a result of demand-side response or the use of other non-traditional solutions to load related issues which were not already factored into the licensee's Buisness Plan; and"

3G	20	Add in text to allow adjustment to DNO's RAV as well as Revenue: Where the Authority gives Notice of proposed relevant adjustments under paragraph 3G.16, the Authority will, by 30 November 2024, determine any revisions that are to be made to the licensee's Base Demand Revenue and Regulatory Asset Value for the Next Price Control Period	N/A	N/A
3G	21(d)	Delete "been".	N/A	N/A
ЗН	19	Simplify the definition of a Worst Served Customer to read: Worst Served Customer: means a Customer of the licensee who has, at the same premises, experienced at least 12 Higher Voltage interruptions over the three-year period immediately preceding the Regulatory Year in which the relevant expenditure is made, no fewer than three of which must have occurred within each complete Regulatory Year falling within the three year period.	Agree with the change to improve the clarity of the definition. The word 'immediately' should be removed to align with the wording of the RIGs v6.0. The definition should be structured to re-introduce (a) and (b) for clarity.	Removed the word 'immediately' and introduced parts (a) and (b) for improved clarity. The definition of Worst Served customer now reads: means a Customer of the licensee who has, at the same premises, experienced: (a) at least 12 Higher Voltage interruptions over the three-year period preceeding the Regulatory Year in which the relevant expenditure is made, and (b) no fewer than three of which must have occurred within each complete Regulatory Year falling within the three year period

5D	3(a)	Insert semi-colon at end of paragraph point (a): (a) the licensee's performance against its Network Asset Secondary Deliverables;	Semi-colon had not inserted in WPD licences provided in the Notice.	This was an oversight in the Notice, and a semi-colon has now been inserted in WPD licences and paragraph lettering corrected where necessary. The text of 5D.3(a) now reads (in WPD's licences): "(a) the licensee's performance against its Network Asset Secondary Deliverables;"
5D	9(a)	Delete "to".	The deletion not made in WPD licences provided in the Notice.	This was an oversight in the Notice, and the deletion has now been made in WPD licences. The text of 5D.9(a) now reads: "(a) the incremental cost of delivering the Network Asset Secondary Deliverables will not be provided for in the licensee's revenue allowance for the Next Price Control Period; and"
5D	24(b)	Insert semi-colon at end of bullet point (b): (b) (where not associated with the amendment) remain as equally challenging as equivalent Network Asset Secondary Deliverables set out in the Network Assets Workbook that was applicable at 1 April 2015;	Semi-colon not inserted in WPD licences provided in the Notice.	This was an oversight in the Notice, and a semi-colon has now been inserted in WPD licences. The text of 5D.24(b) now reads: "(b) (where not associated with the amendment) remain as equally challenging as equivalent Network Asset Secondary Deliverables set out in the Network Assets Workbook that was applicable at 1 April 2015;"

5D	32 (Network Assets Workbook)	amend to: "means the file of that name in Microsoft Excel ® format containing worksheets setting out the Network Asset Secondary Deliverables and the associated file named SD Monetised Risk that calculates the monetised risk deliverable from this, first published by the Authority in February 2015 and as updated by the Authority from time to time and published on its website."	N/A	N/A
5E	2	Change to "Electricity Supplier" which is a defined term whereas "Authorised supplier" is not.	N/A	N/A
5G	1(a)	Insert semi-colon at end of bullet point (a).	Semi-colon not inserted in WPD licences provided in the Notice.	This was an oversight in the Notice, and a semi-colon has now been inserted in WPD licences. The text of 5G.1(a) now reads: "(a) sets out the Baseline Number of Connection Projects;"
5G	7	Remove the words "paragraph 3G.13 of".	Words "paragraph 3G.13 of" not removed in WPD licences provided in the Notice.	This was an oversight in the Notice, and the words "paragraph 3G.13 of" have now been removed in WPD licences. The text of 5G.7 now reads: "5G.7 Where the Authority gives Notice of proposed relevant adjustments under CRC 3G (Revising the allowed level of Load Related Expenditure), the licensee will not be subject to an additional net to gross Load Related Expenditure adjustment."

5К	16	At the definition of Disapplication Notice add the words "that are" after "provisions"	N/A	N/A
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The following changes apply only to the holders of an electricity distribution licence specified in the table:

Licensee(s)	Condition	Paragraph	Change proposed in Notice	Summary of responses	Ofgem response
WMID, EMID,	2B	38	Amend LBDA to IBDA.		
SWALES,			Discrepancy between fast and	N/A	N/A
SWEST			slow-track licences - appears to	N/A	N/A
			be a typographical error.		
SSEH	2B	40	Change SNESRCE to SNESRCEt-		
			2 as per definitions in	N/A	N/A
			paragraph 2B.41		
WMID, EMID,	2B	Appendix 5	Columns 21/22 and 22/23		
SWALES,			amend NA to 0 for WPD	N/A	N//A
SWEST			licensees (does not appear in	N/A	N/A
			slow track licensee's CRCs).		
WMID, EMID,	2D	27	Reference to £700 payment cap		
SWALES,			is still set at £300 in WPD's		
SWEST			licence and needs to be brought	N/A	N/A
			in line with slow tracked		
			companies.		
Modification to	the ED1 Pric	ce Control Fin	ancial Model		
Licensee(s)	Sheet reference	Cell reference	Change proposed in Notice	Summary of responses	Ofgem response
SSEH	SSEH	AN69:AQ69	62%	On the SSEH tab of the PCFM, the terms for the Shetland Extension Battery Costs (SEBC) and Shetland Enduring Solution Process Costs (UCSESPC) are transposed (H35 and H36).	This change has been addressed as part of the consultation for CC09.



Schedule 1- Modifications⁵ to the Special Licence Conditions and ED1 Price Control Financial Model

The modifications are available on our website here: https://ofgem.gov.uk/publications-and-updates/electricity-distributionmodification-special-licence-conditions-electricity-distribution-licence-and-ed1price-control-financial-model

Schedule 2 - Relevant Licence Holders⁶

Eastern Power Networks Plc, registered company number 02366906 Electricity North West Limited, registered company number 03929195 Northern Powergrid (Northeast) Plc, registered company number 02906593 Northern Powergrid (Yorkshire) Plc, registered company number 04112320 Scottish Hydro Electric Power Distribution Plc, registered company number 03043097 South Eastern Power Networks Plc, registered company number 03043097 Southern Electric Power Distribution Plc, registered company number 04094290 SP Distribution Plc, registered company number 04094290 SP Manweb Plc, registered company number 02366937 Western Power Distribution (East Midlands) Plc, registered company number 02366923 Western Power Distribution (South Wales) Plc, registered company number 02366985

Western Power Distribution (South West) Plc, registered company number 02366894

Western Power Distribution (West Midlands) Plc, registered company number 03600574

⁵ A strikethrough denotes a deletion and a double underscore denotes insertion of new text.

⁶ Electricity licence holders are listed at: <u>https://www.ofgem.gov.uk/publications-and-updates/list-all-electricity-licensees-including-suppliers</u>