

Graeme Barton
Ofgem
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Date
23 February 2021
Contact / Extension
Stephanie Anderson
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Dear Graeme,

RIIO-2 NIA Governance Document Consultation (RIIO-2 NIA Consultation)

This response is from SP Transmission (SPT) which holds the transmission licence for the south and central Scotland. SPT is part of SP Energy Networks (SPEN) and the wider Iberdrola group. We welcome the opportunity to respond to the RIIO-2 NIA Consultation, following: the Licence Drafting Working Groups (LDWGs); the RIIO-2 Informal Licence Drafting Consultation issued by Ofgem in September 2020; and the RIIO-2 Statutory Consultation on the RIIO-T2 Licence published on 17 December 2020 (the Licence Consultation), which our RIIO-T2 team has actively participated in.

The issues raised in this response should be considered in conjunction with SPT's response to the Licence Consultation, which we submitted to Ofgem on the 19th January 2021 (SPT's Licence Consultation Response). References to licence drafting and licence conditions in the enclosed Issues Log (at Appendix 1) are references to the RIIO-T2 Licence Conditions as issued by Ofgem on 3 February 2021 together with its decision following the Licence Consultation.

SPT has concerns and comments on the draft RIIO-2 NIA Governance Document included by Ofgem in the RIIO-2 NIA Consultation, from both a policy and a drafting perspective. SPT's comments on the licence condition associated with the RIIO-2 Network Innovation Allowance are set out in detail in SPT's Licence Consultation Response. The comments provided in this letter, and its Appendix 1, are in addition to our previous comments on the RIIO-2 Network Innovation Allowance and should not be considered as replacing those comments. SPT's comments on the draft RIIO-2 NIA Governance Document are detailed in Appendix 1 of this response.

We provide comments in this response on the draft RIIO-2 NIA Governance Document with a view to working with Ofgem to ensure that this document operates fairly, consistently, transparently, proportionately and cohesively.

However, our comments and this letter are submitted to Ofgem entirely without prejudice to SPT's Licence Consultation Response and SPT's rights, including those under the Electricity Act 1989. All of SPT's rights are reserved.

Yours sincerely,



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