The Voice of the Networks

Clothilde Cantegreil RIIO Implementation Team Ofgem 9 Millbank London SW1P 3GE



9 October 2015

How to report Electricity Distribution company performance under RIIO-ED1 – ENA response

Dear Clothilde,

I am writing on behalf of our Electricity Regulation Group which represents all fourteen electricity distribution licensees who are Distribution Services Providers - DNOs. Many of these companies will be submitting individual responses and answering the specific questions outlined in the consultation. Below are some high level points and suggestions which are common across DNOs. DNOs wanted to take this opportunity to highlight that they happy to work with the Ofgem team on these issues.

Need for clarity on what information Stakeholders would like to see - DNOs welcome Ofgem's open consultation and opportunity to understand exactly what reporting stakeholders would like to see on DNO performance. Only through this clarity can DNOs and Ofgem ensure that the reporting process is providing useful information for the broad range of stakeholders with an interest in DNO performance.

Fully utilising existing reporting data – DNOs and Ofgem have spent considerable time developing the regulatory instructions and guidance (RIGs) for RIIO-ED1. The volume of data reported under the RIGs is substantial and is sufficient to enable a comprehensive view of DNO performance to be portrayed. It would not seem to be an efficient use of Ofgem's or DNOs' time to start identifying and defining new sets of data for reporting DNO performance.

Single report - DNOs consider that there should be a single report in which DNO performance is reported. There are already a number of stakeholder reports which DNOs will produce – business plan commitment report, environmental report and potentially RIIO accounts. There is a risk of confusing stakeholders if there are a series of further Ofgem reports on various aspects of DNO performance. A single report which can signpost the other information already published would likely to be most helpful for stakeholders.

Ofgem commitment to publish an annual report on DNO performance – DNOs consider that it would be helpful for companies and stakeholders if Ofgem committed to publishing an annual report on DNO performance around a set time every year. This is the model which is being followed in RIIO-T1 and GD1. It provides certainty for stakeholders and companies and allows them to plan around the publication.

If you have any queries on the points raised in this letter, please contact <u>mark.askew@energynetworks.org</u>.

Yours sincerely,

David Smith Chief Executive, Energy Networks Association