

Annex 6 - Response Template

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Question	Response
<p><i>Q1: Do you have any comments on the scope and purpose of this consultation?</i></p>	<p>We believe the scope and purpose are appropriate. UK Power Networks has carried out extensive consultation on stakeholder requirements for reporting in ED1 which we have shared with Ofgem.</p> <p>As a common point of principle DNOs are already required to report significant amounts of data to Ofgem as part of their licence. Where ever practical this information and the definition of this data should be used in reporting with stakeholders. There should be careful change control on new information or revised data definitions requirements to ensure, transparency, consistency and comparability of reporting across DNOs.</p>
<p><i>Q2: What do you think about the information we suggest including in an infographic-style report included in Table 1?</i></p>	<p>We believe that the Table 1 example is contains the appropriate amount of data.</p> <p>It is however, worth noting that the proposal is to report the difference between actual revenue and allowed revenue. There is of course a difference between what is earned in the year and what is recovered due to the timing requirement on incentive revenues. If the report is to include what is earned in the year then there may need to be an explanatory footnote to explain why this is different from the published revenue reported elsewhere. The same point also applies to Table 2.</p> <p>Whilst the number of new connections to our network is reported in the RIGs we are unsure whether this statistic in isolation will be very meaningful to stakeholders. Note also that the change in total customer numbers each</p>

	<p>year is the total churn, not just new connections added to the previous year's data. We would propose that an additional and more meaningful measure would be capacity added in the year.</p> <p>Finally, given that there are a number of reopener windows in ED1 we believe the comparison vs allowance should be updated as and when allowances are altered.</p>
<p><i>Q3: Are there any other metrics you would wish to see included in an infographic-style report and why? You will find more information on data collected in the RIGs on our website.</i></p>	<p>It is noticeable that customers covered by the ICE incentive (i.e. larger customers not covered by the broad measure or ATTC/Q</p> <p>The information Ofgem is including in its Sustainable Development Indicators publication on Worst Served Customers and Flooding could additionally be included in an ED1 infographic report. This should be consistent with the information already contained within DNOs reporting requirements to Ofgem.</p>
<p><i>Q4: Do you have any comments on the sample infographic-style report included in Annex 1 and the suggested content for an infographic-style report included in Annex 2?</i></p>	<p>We favour a simple performance on a page assessment to present the headlines to wider stakeholders along the lines of the Citizens Advice template. We have proposed the inclusion of measures for all of Ofgem's six output categories as well as two additional categories of costs and innovation.</p> <p>Further thought is required on presenting trends overtime in a clear way in such a concise template to ensure clear communication.</p>
<p><i>Q5: Should an infographic provide information at DNO or DNO group level?</i></p>	<p>Many stakeholders find information at a DNO aggregation to be too high level, therefore there any information at a DNO group level should be avoided as this would exacerbate the situation.</p>
<p><i>Q6: Are there any metrics included in Table 2 which you do not think are relevant or important? Why?</i></p>	<p>Due to the complexity of allowed vs actual revenue, we believe that this should be shown as a stacked bar chart with a split that shows the building blocks up to allowed revenue. This would then have the movements on top of this for items such as incentives to get to actual the revenue.</p> <p>Please note that our point regarding revenue earned/recovered noted against Table 1 also applies here and that in respect of the bill impact line in</p>

	<p>Table 2, this would need to be in respect of revenue collected.</p> <p>Although we have not identified any metrics which should be excluded, it is worth noting that the naming of “Primary Outputs” is slightly misleading as not all are “Primary”. Accordingly “Outputs” would be a more appropriate title.</p> <p>Finally in respect of Table 2, for consistency and clarity the RoRE and RAV values should be those used elsewhere, namely as proposed to be used in the RIIO Accounts.</p>
<p><i>Q7: Are there any other metrics not included in Table 2 which you would also like to see reported in a mid-level report? Why? You can find more information on data collected in the RIGs on our website.</i></p>	<p>Fluid leakage from pressurised cable systems is not reported. It would be necessary to include normalised leakage data (based on the amount of fluid in service, or focusing on the trend over time). As these systems are expensive to replace their inclusion in the reports is appropriate.</p>
<p><i>Q8: Would you like information and/or data published to reflect in-year performance or are you also interested in performance up to date and/or forecast or cumulative data? If so, why?</i></p>	<p>Regulatory Year and cumulative performance to date should be included to show trends overtime and absolute performance improvements since the beginning of the period.</p>
<p><i>Q9: Do you have any comments on the templates provided by stakeholders in annexes 2 and 3?</i></p>	<p>We believe that the British Gas approach could form the basis for a template based on the RRP returns to minimise data population requirements. The reporting requirements should not create unnecessary duplication of effort in addition to the RRP returns.</p> <p>In annex 3 it is unclear what the basis is for “RIIO-ED1 target (initial)” and “RIIO-ED1 target (revised)” as many of the metrics are not subject to reopeners e.g. undergrounding has a use it or lose it allowance for the full 6 years. Similarly there is no reopener mechanism for CI and CML targets so there should not be a “revised” block against these metrics.</p>
<p><i>Q10: Would you be interested in the bill impact of each individual incentive or is overall bill impact a more useful measure?</i></p>	<p>We believe that consolidated impact at a bill level is appropriate bearing in mind the scale of bill impacts if broken down to individual incentives.</p>
<p><i>Q11: What additional data or information submitted in the RIGs would you like to see made publically available and why? You will find more information on data collected in the RIGs on our website.</i></p>	<p>We believe that the data being proposed is sufficient.</p>
<p><i>Q12: Do you have any preferences on the way data and information is</i></p>	<p>Providing the underlying data in an excel format in addition to any graphical/</p>

<i>presented?</i>	pictorial view would be beneficial.
<i>Q13: What data should the DNOs publish?</i>	After consulting with stakeholders we believe that DNOs should present the one page summary in a consistent format with freedom to then break this out into a more detailed report(s) for stakeholders.
<i>Q14: What are your views on what data Ofgem should publish?</i>	We believe that Ofgem should publish detailed comparative data to give an independent view of performance.
<i>Q15: Based on the examples in annexes 1 and 4, and in tables 1 and 2 above, what do you think about using ranking and/or traffic lights? What are the advantages and disadvantages? Are there any alternative systems?</i>	<p>We support the use of traffic lights as they are very clear to readers. However, to enable their use Ofgem must agree and publish (in advance) the boundaries between each colour so DNO are clear what is expected of them in terms of performance to achieve a green status.</p> <p>More granular approaches will be helpful at a more detailed level for comparing relative performance.</p>
<i>Q16: Are there any particular aspects of DNO performance that you are interested in and think are well-suited to ranking and/or traffic lights?</i>	<p>Where there are established comparative measures (e.g. BMCS, IIS, ATTQ/C) then rankings are good tools to use.</p> <p>Where relative performance is more difficult to achieve (e.g. BCF where it is hard to normalise due to the number of potential factors which could be used) then Ofgem should be more careful in its use of relative rankings</p>
<i>Q17: What information or data would you like us to publish on our website?</i>	Comparative performance information, validated by Ofgem in the form of an annual report.
<i>Q18: Keeping in mind the reporting requirements and timings set out in Annex 5, is there any specific data or information which you would like to see reported on more than an annual basis? If so, why?</i>	We do not believe that there should be an obligation on DNOs to publish information more than on an annual basis. It is for individual DNO's to ensure that they provide the information that stakeholders require at the frequency that is appropriate to them.