

Anna Rossington
Head of RIIO Implementation
Ofgem
9 Millbank
London
SW1P 3GE

Mark Ripley
Director, UK Regulation

mark.g.ripley@nationalgrid.com
Direct tel +44 (0)1926 654928
Mobile +44 (0)7768 106952

18th January 2016

www.nationalgrid.com

Dear Anna,

National Grid Electricity Transmission , National Grid Gas Transmission and National Grid Gas Distribution: Response to Ofgem's Consultation on a proposed amendments to the Data Assurance Guidance submissions for network companies

We welcome the opportunity to respond to the proposed amendments to the Data Assurance Guidance. We have responded to the relevant main points below and more specifically to the DAG submission list in the attachment.

Electricity transmission, gas distribution and gas transmission – update to proposed DAG submission list.

In general the consultation does not seem to have taken into consideration any of the comments made by ENA in their October 2015 letter which outlined changes to the submission list. This had corrected for known reporting changes such as new RRP tables 2.3a and b and the subsequent renumbering of section 2 but the consultation list has not.

We feel that the submission list could be more specific to individual parts of the licence reporting obligations as some obligations may have more than one reporting requirement. As an example of this, Gas Transmission SpC 8G Maintenance and Operational Planning has three parts that are either submitted to Ofgem or published on the website, they are;

- 8G.2 and 8G.3 – Plan Publication
- 8G.7 – Report on Maintenance notifications - Website
- 8G.8 – Report on Maintenance notifications - Ofgem

Individual comments on the DAG submission list are included in the following attachments; 'NG DAG consultation – comments on submission lists'

Reporting requirements for all networks

We have considered Ofgem's proposal that networks will only have to submit those tables where the overall risk rating has changed since the previous DAG submission and whilst we appreciate the intention behind the proposal, we believe that it does not reduce the reporting workload for networks. We will continue to be required to risk assess all tables and obligations per the DAG requirements and we collate these scores on excel spreadsheet 'riskassessmenttemplate' (currently v1.1) which is a fixed spreadsheet to collate all listed DAG submissions. To then exclude assessments which haven't changed could require us to strip these out and use a separate template, hence creating additional work.

We presume that the current standard template allows for easy comparison between network scores. If each network has a separate list this comparison will prove difficult.

The current NetDAR guidance section 3.1 (an update of which was not included in the consultation) already only requires us to report on changes to scores, and HIGH and CRITICAL scores;

- *Include an explanation of any changes in the risk ratings from the previous year's plan (including new risk factors, effects of error events and effects of assurance activities carried out).*
- *For high and critical risk submissions, briefly explain the main cause of high, critical risks (impact and/or probability scores).*

DAG documents

The consultation states that any new or modified provisions of the documents to take effect from 31 January 2016. This timescale is extremely late in our DAG submission preparation and we have already made a lot of progress in collating our risk assessments, actions and scores on v1.1 of the risk assessment template and would not welcome a change to the templates at this late stage. We suggest that in future the consultation timescales are bought forward several months.

I hope that you find this response useful. If you would like to clarify anything in our response please do not hesitate to contact either myself or Joanne Weston (joanne.weston@nationalgrid.com) for Transmission queries and Shahid Mirza (shahid.mirza@nationalgrid.com) for Distribution queries.

Yours Sincerely

Mark Ripley
Director, UK Regulation
(by email)