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Mr Aris Kalogeropoulos,
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Smarter Grids and Governance
Ofgem
9 Millbank
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Our ref

Your ref

Date

-

13 January 2016

Dear Aris

Consultation on Updated Data Assurance Guidance (DAG)

I am writing on behalf of Western Power Distribution (South Wales) plc, Western Power Distribution (South West) plc, Western Power Distribution (East Midlands) plc and Western Power Distribution (West Midlands) in response to the above consultation.

DAG Guidance Document

We note that the only material change to the DAG is at paragraph 4.3 "*The Licensees are required report to Ofgem only the Conditions / tables for which their overall risk rating has changed since the previous year's submission*".

Please could Ofgem confirm that paragraph 4.3 would take precedence over paragraphs 4.6 to 4.8. We suggest that paragraph 4.3 is moved into the section headed Report Formats in order to qualify 4.6-4.8.

However we are not sure that the proposed selective reporting of submissions under 4.3 will provide Ofgem with the visibility that they are looking for.

Risk Assessment Template

Line 23, Item 6 – this should be removed as this relates to the Costs and Volumes Pack & Commentary as a whole.

Line 144 Items 125 – this requirement does not apply to all DNOs.

Line 159, Item 140 – the rail electrification reopener does not apply to WPD, as 162 Item 143 applies to WPD instead.

Line 160, Item 141 – the link box reopener does not apply to WPD.

We note that Line 166, Item 147 requires the DPCR5 RRP Restatement to be treated as an irregular submission and data assured as a complete pack.

Yours sincerely

A handwritten signature in black ink, appearing to be 'AS', written in a cursive style.

ALISON SLEIGHTHOLM
Regulatory & Government Affairs Manager