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Date:
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Dear Louise

Notice proposing modifications to the Regulatory Instructions and Guidance (RIGs) for RIIO-ED1

We welcome the opportunity to comment on the proposed changes to Version 1 of the RIGs for RIIO-ED1.

SPEN is fully supportive of Ofgem's decision to extend the deadline for submitting the Secondary Deliverables for the 15/16 period to 30th December 2016 as this will allow for us to implement the Common Network Asset Indices Methodology in line with Ofgem's recent direction.

SPEN also supports the proposed changes to the RIGS which provide further clarity for DNOs. However, we would like to use this opportunity to raise further comment on the Interruptions RIGS (Annex F); Connections (Annex G); and the Environmental & Innovation RIGS (Annex J), please see below:

Annex F Interruptions

No.	Reference <i>(Paragraph number, glossary term or table name)</i>	Ofgem Change	SPEN comments
1	QoS Interruptions Data Reporting Pack	Revenue Link Table tab added from QoS Interruptions Reporting Pack	The revenue link tab is picking up the unadjusted values (before Exceptional Events). This will be fine if there are no Exceptional Events, but may be confusing if there are. Perhaps an explanatory note in the tab may be helpful and avoid future confusion?

7	QoS Interruptions Stage Data Reporting Pack	Headings updated from 18 to 12 hours.	The table in the QoS_Interruptions_Stage template has been corrected to align with the guaranteed standards, however, the underlying calculations within the sheets have not changed
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In addition to Ofgem's proposed changes, we wish to make the following comments in relation to the Interruptions RIGS (Annex F):

Annex F Interruptions - Appendix 6	Population of the new tab 'LV plant & equipment link boxes only - damage'. In Appendix 6, MEI Codes identifies how the MEI code cross reference to all the tables, but there is no mention of the new tab. Can Ofgem please confirm that it only wishes: 67 Switchgear - Linkbox to be included in the new tab?
Annex F Interruptions - Appendix 4	In Appendix 4, the RRP 'Plant & Equipment LV link boxes only' should align to IIS 'LV P&E link boxes only' tab only. It currently shows that it also aligns to the IIS 'LV all other switchgear, P&E' tab.
QoS Interruptions Stage Data Reporting Pack	QoS Interruptions Stage template is now 23MB before any data is loaded (it is 5MB in the compressed version), making it difficult to data share/exchange. Is it possible to consider the level of detail, in particular the interlinked cells, with a view to reducing the size?

Annex J Environmental & Innovation

No.	Reference	Change	Reason for change	SPEN comments
1	Annex J Environment and Innovation Guidance - 2.45	2.45 amended to : This is to consider DNOs' responsibility towards losses as a Scope 2 emission	This change is to clarify that DNOs should apply the relevant generation conversion factor to their specific reported losses levels and not use the conversion factor labelled 'T&D losses' as this already incorporates a factor associated with % losses levels.	We would be very grateful for further explanation of the reason for this set against the GHG protocol and GHG guidance. Is this the 0.46219 factor used in the "UK electricity" tab in the current guidance for 2015?

In addition to Ofgem's proposed changes, we wish to make the following comments in relation to the Environmental and Innovation RIGS (Annex J):

BCF Harmonisation of tables between RIIO T1 and ED1	BCF Reporting for distribution will require the new E3 table to be used for distribution but not for RIIO T1. This will involve a duplication of method as ED1 requires volumes and conversion rates to be provided, whilst T1 will require only carbon emissions to be stated. We would be very grateful if Ofgem could provide its view on this matter.
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Annex G Connections

We note that in relation to the connections RIGS Tab CR4 - Completed summary, 3 tables have been updated to include DPCR4 connections. We believe this may be an error as it would seem inappropriate to require DNOs to report on DPCR4 performance 2 price controls later. We appreciate that Ofgem are already looking into this.

Please do not hesitate to contact me should you have any queries at all in relation to our comments.

Yours sincerely,



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