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24 July 2017

By email to [mick.watson@ofgem.gov.uk](mailto:mick.watson@ofgem.gov.uk)

Dear Mick

**Notice under Part C of Standard Licence Condition 46 (Regulatory Instructions and Guidance) of the Electricity Distribution Licence of proposed modifications to the Regulatory Instructions and Guidance**

This letter should be treated as a consolidated response on behalf of UK Power Networks' three licensed distribution network operators (DNOs): Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc.

Thank you for the further opportunity to provide feedback on the above notice which amends the Triennial RIGs reporting pack. We have set out our feedback on the in the appendix to this letter, if you have any queries please do not hesitate to contact us.

Yours sincerely



James Hope  
Head of Regulation & Regulatory Finance  
UK Power Networks

Copy Michele Hirons-Wood, Head of Pensions, UK Power Networks  
Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks  
David Pang, Regulation Analyst, UK Power Networks

## **Appendix**

1. Context – the final paragraph in this section infers these RIGs apply retrospectively ie for DNOs it applies back to 01/04/2015. The RIGs changes cannot apply retrospectively and we seek clarity on the meaning of this paragraph.
2. Paragraph 1.5 refers to “this supplement” – it is unclear what document this is referring to.
3. Table 1.1 – the commentary in rows 3(a) and 4(b)(b) will likely be the same document. With this in mind it would be sensible to caveat 4(b)(b) to clarify that licensees can signpost the previously submitted commentary rather than have to resubmit it.
4. Paragraphs 21.1/21.5/21.10 use caveats such as “should” and “aim” – these can be removed. We have not reviewed the remainder of the chapter for equivalent wording but if you agree that these words can be removed then the whole chapter should be reviewed to ensure consistency.
5. Paragraph 21.16 – insert “below” after “(a) to (d)” to ensure clarity on which sub-paragraphs are being referred to.
6. Paragraph 21.19 has a cross reference to cell G47 – we believe this should be C47.
7. Using paragraph 21.28 as an example it includes a definition of ABV (“ABV means...”) which is then repeated in Appendix 1 (the definitions and interpretations). As with other RIGs, words should only be defined once. Our preferred solution would be for definitions to be removed from throughout chapter 21 and replaced with a signpost to appendix 1. This avoids the risk of two different definitions for the same term.
8. We note the inconsistency in the inclusion of the colour key (e.g. reminding user that yellow are data entry cells) in some tabs but not others. We support the inclusion of this in each tab.