

Grant McEachran  
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Ofgem  
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16 March 2018

Dear Grant

**RIGs Consultation – response to changes proposed on 16 February 2018**

Thank you for the opportunity to respond to the above consultation. Our response should be treated as consolidated on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc.

The table below provides our feedback on the changes – where no feedback is provided in the table we are supportive of the change.

Annex	Issue No.	Reference	Change	Reason for Change	UK Power Networks response
Annex F	2	Para 2.11 RIGs	Text added to clarify requirements of DNOs during Smart meter alerts	Clarification	The proposed wording prevents DNOs from calling single premises out of hours. In certain circumstances (e.g. high profile customers, premises that operate 24/7 or where a customer is happy to receive contact outside these hours) DNOs should not be prevented from making calls. Furthermore, the paragraph should also be amended to clarify that until contact is made (or the customer rings in to report an outage) then the IIS (or EGS for para 3.14) clock has not started
Annex F	3	Para 3.14 RIGs - add new paragraph	Text added to clarify requirements of DNOs during Smart meter alerts	Clarification	See 2.11 above

Annex	Issue No.	Reference	Change	Reason for Change	UK Power Networks response
Annex B	19	Guidance para 3.9: additional FI information submission	Additional documents associated with the old FI packs are still required to be submitted, as per the RIGs. Additional information section deleted.	Clarification	This comment on the log contradicts itself. In line with the changes in Annex B, it should say "Additional documents associated with the old FI packs are <b>no longer</b> required to be submitted. Additional information section deleted."
Annex C	7	'R2 Changes Log' cell D12	Added Corporation Tax Rate to 2016/17 and 2017/18'	Consistency	Ofgem have used the data originally published by the Treasury on 16th November and not the revised data published on November 28th. As a result the RPI value on; sheet R5 Input page, cell I15, currently says 3.5% and should say 3.4%.
Annex H	4	Annex H : Paragraph 3.10	Last bullet point of paragraph 3.10 removed to avoid duplication.	Not required	We support its removal but would appreciate it if Ofgem can confirm in the issue log that accompanies the Notice that Ofgem are comfortable that records shouldn't be included if it would put us in breach of other legislation ie GDPR

If you have any queries on the above please do not hesitate to contact me.

Yours sincerely



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