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WWU Response to Ofgem's Consultation on proposed amendments to the Gas Distribution Networks' (GDNs) Workbooks contained in Schedule 2: Appendix to Special Condition 4H – Specification of Network Outputs

WWU welcome the opportunity to comment on Ofgem's consultation regarding the alignment of the GD1 Asset Health Workbooks with the RIIO-GD1 Final Proposals.

Analysis by Ofgem and the GDNs has clearly shown the original Health and Risk workbooks do not reflect the RIIO-GD1 Final Proposals. We fully support the need for the original Health and Risk workbooks to be updated to reflect Final proposals. Without this step, the 'equally challenging' tests on the new monetised risk targets will not be valid and will prevent GD1 monetised risk targets from being approved.

We have reviewed the proposed modifications that you have published for WWU and are satisfied that they reflect the asset intervention workloads allowed in RIIO-GD1. These changes can be traced back to the Final Proposals document issued in December 2012.

If these corrections are accepted, we support the move to the second consultation in the Gas Distribution rebasing process, on track for conclusion in April 2019.

If you wish to discuss this response in more detail, please contact Ian Dunstan (Asset Strategy Manager) e-mail Ian.Dunstan@wwutilities.co.uk or phone 07785725267

Kind Regards

Ian Dunstan

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