

By email:  
Christopher.Haworth@ofgem.gov.uk

Your ref

Our Ref

Date

6<sup>th</sup> April 2020

Contact / Extension

Drew Simpson  
0141 614 1962

Dear Christopher

**Notice proposing modifications to the Regulatory Instructions and Guidance (RIGs) for RIIO-ED1 (version 6.0)**

*This response is not confidential.*

We welcome the opportunity to provide comment on the proposed RIGS modifications which will take effect in April 2020. We note that the data submitted for the 2019/20 reporting year will use the RIGs as modified. However, we do wish to raise our concerns in relation to the RIGs submission within the current climate. In light of recent COVID-19 development, we note that Ofgem has published a notification on its website which indicated that it will look closely at how it approaches regulation in the coming months to avoid placing unnecessary burdens on network companies. We ask that Ofgem consider regulatory submissions within this as we are dependent on operational staff providing much of the data we are required to report within the RIGS submissions.

We very much support the RIIO Distribution team's desire to ensure that regulatory reporting is maintained effectively, however, we suggest the implementation of 'modification windows' for regulatory guidance, so that Ofgem can only change regulatory reporting guidance documents once a year within a specified timeframe. This will ensure that licensees are afforded the appropriate time to roll out any new regulatory rules to their businesses and make any necessary system changes. We would also request that any timeframes are set so that the regulatory guidance is finalised in advance of the next relevant reporting year. This will reduce a significant amount of administration for both Ofgem and the DNOs as well as prevent any errors as a result of retrospective changes. We support the majority of Ofgem's proposals and have provided comments within Appendix 1.

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Please don't hesitate to get in touch with me, should you have any questions in relation to this response.

Yours sincerely



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**APPENDIX**

**Annex A Glossary**

<b>No.</b>	<b>Reference (Paragraph number, glossary term or table name)</b>	<b>SPEN Comments</b>
11	Annex A Glossary: Asset Replacement	CV25b is to assist in assessment of the Shetland reopeners and hence is not appropriate for DNOs other than SSEN to report activity in CV25b.
14	Annex A Glossary: Faults	According to the cost and volume guidance in 6.213, this only applies to SSEN. Can you confirm whether this refers to all DNOs? Also, in page 112 of the glossary we would suggest the use of the word "submarine" before diesel generation for clarity.

**Annex B Cost and Volumes**

<b>No.</b>	<b>Reference (Paragraph number, glossary term or table name)</b>	<b>SPEN Comments</b>
20	Annex B Guidance: CV1 Primary Reinforcement	We feel clarification should be extended to CV2 as well. Also, we feel it would be helpful if flexibility was clarified in Annex E Reinforcement.
26	Cost and Volumes Reporting Pack: CV1 Primary Reinforcement & CV2 Secondary Reinforcement	We feel it would be helpful if flexibility was clarified in Annex E Reinforcement.

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No.	Reference (Paragraph number, glossary term or table name)	SPEN Comments
2	Annex H Guidance: General Enquiries	We agree with the wording “a) The DNO has provided that service” however, we do not agree with “b) The DNO has provided advice to the customer...” as we think that advice does not constitute a service.

**Annex G Connections**

No.	Reference (Paragraph number, glossary term or table name)	SPEN Comments
1	Annex G Guidance - Appendix 6 - SLC 15A quarterly reporting template	<p>This change does not align to the reporting template which is all now reported at value incurred and not paid.</p> <p>Also, cell E9 in the reporting template should be changed from ‘TOTAL penalties paid against the standards this quarter:’ to ‘TOTAL penalties incurred against the standards this quarter:’ This supports that row 9 values are formula driven and total the values in column J, which are penalties incurred, not paid.</p>