

Christopher Haworth  
Ofgem  
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32 Albion Street  
Glasgow  
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6 April 2020

Dear Chris,

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

We welcome the opportunity to provide our views on the proposed modifications to the Regulatory Instruction and Guidance (RIGs) for RIIO-ED1 (version 6.0).

Overall, SSEN is supportive of the majority of Ofgem's proposed modifications to the RIIO-ED1 RIGs. However, we have comments relating to some of the proposed modifications to Annex A and B and the Cost and Volumes Reporting Pack. Further detail has been provided in Appendix 1.

If you have any questions on our view or would like to discuss this further, please do not hesitate to contact me.

Yours Sincerely,

Louise Deighan  
Network Regulation

## Appendix 1

### Overview

- We are happy with the proposed changes.

### Annex A – Glossary

- We are pleased the **definitions for Sub Cables** within the Glossary has been updated to include lakes. However, we are disappointed that the definition has not been updated to include canals. SSEN has cables in canals and as with other submarine cable projects we believe they should fall into this definition; the methods and costs for inspecting, maintaining, replacing these cables is significantly different to other above ground or below ground cables, we will also have to conduct shore end inspections and engage with environmental agencies prior to any intervention on the assets etc. We appreciate the timing issue for implementing the inclusion of this and recognise that the proposed change may have an impact on CV tables, therefore we request confirmation that Ofgem will review again its position on this and consideration to be made at the ED2 BPDT discussion in April under the Ofgem working group.
- **IT & Telecoms (Business Support) – Annex A and C13** – The definition for IT&T (BS) in Annex A excludes *All ongoing support costs for Cyber Resilience activities*. This does not align with Annex B and C13 - IT&T (BS) of the C&V pack, there is a requirement to report Cyber Resilience Costs in a memo table. Please provide further clarification.

### Annex B – Cost and Volumes

- **Sub Cables/CV7/CV25/CV25a/Cv25b** - We welcome the addition and updates of sheets within the Cost and Volumes Reporting pack to include Shetland and Subsea Cable. Additionally, we agree with the Submarine Cables being greyed out within the CV7 tab, CV25b allows for the reporting of this. It will provide greater clarity of costs including the costs associated with protection. If the costs were to be reported under CV7, the unit costs will be significantly higher for SHEPD due to the inclusion of protection costs within this reporting, therefore, all DNOs reporting under CV25b will allow for appropriate benchmarking.

Under CV25b of Annex B, the proposed text will need to be updated to reflect that all DNOs are required to report here and not SHEPD only.

- **CV25a table for Shetland (SSEH)** - We note that the new CV25a table for Shetland contains old terminology that was applicable to the first 4 years of ED1 reporting. This is also referenced in Annex A and Annex B. We propose that we continue to report using the old terminology for this year as there are no fundamental errors caused by this in either the C&V packs or the PCFM. We would like to highlight that the terminology used for Shetland will require updating in the next version of the RIGs.
- **CV2** - minor amendment – Ofgem has added a line to record flexibility payments to service provider (row 161), this does not have a header.

### **Annex F – Interruptions**

- **QoS Interruption and Stage Data reporting and guidance.** We welcome the proposed changes to the guidance and the introduction of the new IIS stages template, which we have fully tested and works within our reporting systems.

### **Annex G – Connections**

- **Annex G/Annex A guidance – Quotation Offer date/Quotation Issue date** - We note wording relating to working day for issuing a connection offer, is inconsistent between Annex A and Annex G of the RIGs. There are two definitions within Annex A, Quotation Issued Date and Quotation Offer Date. We do not believe it is clear which definition should be used in relation to 2.130 of Annex G.

The definition of 'Quotation Offer date' in Annex A, refers to 'quotations offered after 5pm rolling into the next working day', whereas paragraph 2.130 of Annex G states 'If it has been issued before 23.59 on a Working Day then it will have been deemed to have been sent on that Working Day.'

It would be helpful to align the wording to ensure there is clarity and a consistent approach across the DNOs.