

Steve McMahon
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Sent by email to: anthony.mungall@ofgem.gov.uk

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Dear Steve,

Proposal to modify the Regulatory Instructions and Guidance (RIGs) for RIIO-ET1

Thank you for the opportunity to respond to the proposed modifications to the Regulatory Instructions and Guidance (RIGs) for RIIO-ET1.

We have gathered our response and presented this in the table provided below. You will note that this requests a couple of clarifications relating to Section 6 where Ofgem's feedback would be welcome.

For Section 3 we have clarified how we intend to present information relating to a fault on Skye. While full details are still being gathered, the intention here is to ensure it can be clearly identified.

Please let me know if I can be any further assistance or if there is anything here you would like to discuss.

Yours sincerely

Josh Henderson
Senior Regulation Analyst

Section	Issue	Status	Comments
Section 6	<p>Last year additional tables were added to Table 6.5 to collect data on assets using non-SF6 alternative Interruption and Insulation Gasses (IIG). Within the RIGs an IIG is defined as a gas with a global warming potential (GWP) of greater than zero. However, in our T2 Special Conditions an IIG is defined as a gas with a GWP greater than one.</p> <p>If the 2021 RRP is to be used to inform our position going into T2 there is a slight misalignment.</p>	Open	<ul style="list-style-type: none"> Request to clarify if the 2021 RRP will be used to inform of our IIG position ahead of RIIO T2 Please confirm that the IIG definition will be consistent with the FDs and used for the 2021 RRP.
Section 3	<p>Following a fault on Skye on 9th March, we had several thousand domestic and businesses off supply for more than 6 hours and some more than 12 hours, which will result in a payment being made from us to them in line with our methodology statement, copy attached. A copy of this methodology statement was given to Anna Kulhavy at Ofgem on 29th January 2021.</p> <p>As we are still gathering details of the number of customers off supply / making payments our final pass through cost to SHE Transmission will not be known for a few months. However, as this fault occurred in T1, we have accrued for this cost and there doesn't appear to be a row to enter this in the RRP.</p>	Open	<ul style="list-style-type: none"> We are proposing to post this cost table 3.1 in "Items outside of totex" under the Penalties and Fines row, so it can be easily identified.