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3rd August 2022

WWU response to Consultation on modification of the RIIO-2 Strategic Innovation Fund Governance Document

Dear Graeme,

Thank you for the opportunity to respond to the consultation. Wales & West Utilities is a gas transporter serving 2.5 million supply points in Wales and south-west England.

General comments on the consultation are that Ofgem need to ensure that there is clear delineation between its responsibilities as the regulator and Innovate UK's role within SIF.

This should include:

- Clarity in the Licence and SIF Governance Document around dissemination requirements, including the annual conference
- Project Direction from Ofgem as the regulatory authority
- A clear appeal route for decisions, as existed for the Network Innovation Competition
- Logging of feedback by Innovate UK and explanation for changes not taken forward

For specific consultation comments, please see page 2 and the attached 'Proposed SIF Governance Document line by line changes' Microsoft Excel spreadsheet.

Yours sincerely,



Carly Evans
Head of Regulation
Wales & West Utilities
SIF Consultation Questions:

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1. Do you agree with the proposed amendments to the SIF Governance Document? (We are happy for respondees to comment on individual changes within the spreadsheet published alongside this consultation if they wish to)

We have provided a substantial number of comments on changes in the spreadsheet.

2. Do you agree or disagree with proposed requirement for applicants to outline what other UK government funding (aside from the SIF) a proposed Project, or aspects of Project, has received in the last 36 months when submitting an Application? Do you also agree or disagree with the period of 36 months for this proposed requirement?

We broadly agree but would welcome clarity on how “aspects of the Project” will be defined.

3. Do you agree that the amended SIF Governance Document should come into force in August 2022, and should apply to all in-flight and future SIF Projects?

We agree – this should come into force before Round 2.

4. Do you agree or disagree (giving reasons) with DNO participation in round 2 of the SIF?

We agree as this can help facilitate Whole Systems projects.

5. Are there any specific considerations relating to the proposed participation of DNOs in round 2 of the SIF which need to be taken into account in the SIF Governance Document?

None that we're aware of.

6. Do you agree that the proposed drafting amendments on IPR within the SIF Governance Document make it easier to understand the default IPR rules?

The changes do not appear particularly significant, and Ofgem should engage with third parties who have commented that this section needs revising to understand their views.

7. Do you agree there is a need for an illustrative guidance document which seeks to help third party innovators understand the default SIF IPR?

We agree, and suggest this could be captured in a revised Energy Networks Innovation Process document to provide a single reference for third parties on IPR in network innovation.

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