
RIIO-ET3 Business Plan Data Template Commentary

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This document provides a template and instructions for providing supporting commentary for the RIIO-ET3 Business Plan data templates.

This document is for people who are filling out the RIIO-ET3 Business Plan data templates and this associated commentary template. It explains what information should be provided in the commentary, and where to find more information.

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1. Instructions and Guidance

Background

- 1.1 This document, the RIIO-ET3 Business Plan Data Templates Commentary (BPDTC), is a template for TOs to provide additional information alongside the Business Plan Data Templates (BPDT), to help:
- identify, explain, and justify the main drivers of forecast expenditure and volume profile across the RIIO-ET3 price control period;
 - explain scenarios used to justify the forecast workload volumes and costs across the RIIO-ET3 period;
 - explain any assumptions made in populating the tables and how any allocations have been applied;
 - explain any allocation methodologies applied, which have not been detailed elsewhere in the business plan submission; and
 - assist Ofgem in the process of navigating the data submission and supporting documentation.
- 1.2 This document should be read alongside the Business Plan data template instructions and guidance for RIIO-ET3, the RIIO-ET3 Business Plan guidance, and the RIIO-ET3 Sector Specific Methodology Decision.

Instructions

- 1.3 Alongside the submission of the RIIO-ET3 BPDT, TOs must, to the best of their ability, complete this BPDTC template for each worksheet in the BPDT. For each worksheet, where appropriate, include commentary on the following actions:
- Compare the current forecast across the RIIO-ET3 period and the latest information on the forecast position across the RIIO-ET2 period, and explain any material step changes or differences between them. Please include information in terms of run rates, trends, unit costs, or another established metric, and explain the reason for any material step change or difference.
 - Summarise and explain the profile of the RIIO-ET3 information.

- Provide justification for any unit cost/trend outliers, including any regional and/or site specific factors and where there is material interaction with other areas of the BPDT.
 - Identify and explain the scenario used for planning, the level of sensitivity within the forecasts used and clarify how uncertainty has been considered/tested. Indicate the materiality of these assumptions.
 - Explain interactions with wider governmental policy.
 - Explain the types of internal and external benchmarking exercise (where applicable) that have been undertaken to support the RIIO-ET3 forecasts (eg. internal tendered framework rates and/or international unit cost comparison).
 - Cross reference areas of the BPDT submission that can be used to further evidence or substantiate the submission (eg. cells A:B of tab “X” of the BPDT or supporting document “Y”).
 - Highlight any relevant additional information to aid Ofgem’s understanding and interpretation of the information.
 - Where costs have been apportioned across one or more activities, the basis of apportionment must be provided in the cost commentary document. Please also give an indication of the robustness of those assumptions.
- 1.4 The BPDTC template is applicable to all worksheets in the final RIIO-ET3 BPDT, except for any cover, contents or summary sheets, and some finance, asset and other sheets. If TOs consider it necessary or useful to provide supporting information on any worksheet we have not requested commentary on, there is space for this at the end of this document. Each TO must use reasonable endeavours to provide a commentary for each of the categories above. TOs should report “n/a” where questions do not apply to the subject matter of the worksheet and should ignore any tables that do not apply to them.
- 1.5 Unless otherwise specified, the BPDTC must not exceed three pages in length for each worksheet. Where visual representations of information (e.g. waterfall diagrams) may aid understanding these should be included and will not contribute to the page limit.
- 1.6 Where information that is relevant for the BPDTC is located in the main Business Plan submission or supporting files (e.g. engineering justification, CBA etc.);

directions to the relevant information must be clearly signposted in the BPDTC. Where it is not possible to include all prescribed information, TOs will need to clearly explain the reasons why.

- 1.7 If any information or commentary has been provided in the wider business plan submission and there is explicitly and clearly a direct overlap of the requested content signalled in this BPDTC, the TOs may avoid duplicating the commentary on the basis that appropriate references are made to the relevant materials as noted in paragraph 1.6.
- 1.8 The appropriateness and materiality of the commentary provided should be at a level that minimises the need for Ofgem to ask supplementary questions.
- 1.9 TOs should, to the fullest extent possible, ensure that the BPDTC contains all information relevant to Ofgem’s assessment of the plan. This includes providing a proportionate summary of the overall activity level experienced and costs incurred and expected by the TO. The BPDTC must therefore provide overview information on the level of activity and costs across the RIIO-ET1 (where applicable) and RIIO-ET2 periods and the current BPDT forecasts for the RIIO-ET3 period. Where a variance is observed in the transition between price control periods, a succinct explanation of the material differences between them and factors driving the variation is required.

2. Data Table Commentary

- 2.1 TOs must provide commentary for each of the BPDT worksheets using the templates below.

General Tables

1.1 Cover

No TO input required.

1.2 Contents

No TO input required.

1.3 Version History

No TO input required.

1.4 Change Log

No TO input required.

1.5 Data Checks

No TO input required.

1.6 Data Constants

No TO input required.

1.7 Assumptions

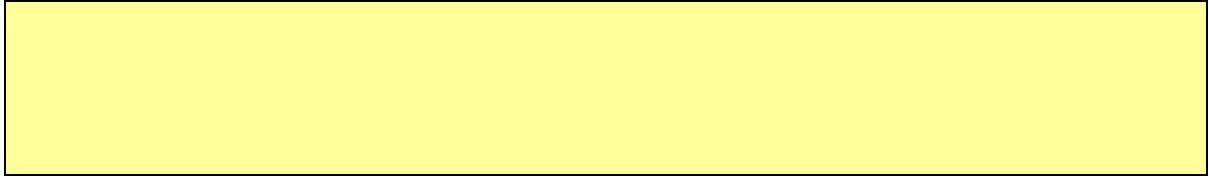
Commentary

1.8 Asset Possibilities

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11.8 Vehicles & Transport Memo

Commentary

11.9 Climate Resilience Memo

Commentary

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11.10 Contractor Indirects

Commentary

Additional Commentary

- 2.2 TOs should include additional supporting commentary on the BPDT where they consider it necessary to aid Ofgem’s understanding of the BPDT submission. Please insert any additional commentary below using headings and commentary boxes.

Additional commentary

Commentary