Utility Regulator
ELECTRICITY GAS WATER

Electricity Metering RIGs Commentary Template

2022/23 RIGs Submission



Electricity Metering RIGS Commentary Template

Contents

1. Introduction

1.1 Overview

1.1.1 A commentary template provides the opportunity for licensees to explain why costs (and incomes) have been incurred, any movements between different time periods, and the reasons for variations between forecast and outturn. As set out in the associated Guidance Notes, the commentary will be used in conjunction with the wider reporting framework (including the Reporting Workbook and Assurance Workbook), to understand the structures and operations of the licensee, to inform the next price control and to monitor performance against the Authority's current price control assumptions.

1.1.2 Other guidance on the completion and submission of commentary is included in the Electricity Distribution Cost & Volumes RIGS Guidance Notes.

1.1.3 A full commentary addressing all material issues will help reduce the number of follow up questions and time spent by both the Authority and licensee staff.

1.1.4 This document has been created such that the licensee shall insert their comments in the sections identified below in yellow. No additional or freeform document need be created but instead we request the licensee insert an appropriate chapter heading and commentary box in the body of this document where it is necessary to provide additional commentary.

1.1.5 Backup documents referenced in the commentary should be attached as Annexes to the submission of this commentary. An electronic copy of any Annex shall be provided. The file name used for the electronic copy of any Annex should include a reference to the relevant section of the commentary and be structured so that the order of the file name is the order they appear in the commentary.

1.1.6 The Assurance Commentary shall be titled "YYYY_MM_DD Electricity Metering RIGS Assurance Commentary" and the Assurance workbook shall be titled "YYYY_MM_DD Electricity Metering RIGS Assurance Workbook" where YYYY represents the year, MM represents the month and, DD represents the day relevant to the request from the Authority or the submission from the licensee.

2. General Commentary

2.1.1 The licensee should provide general commentary on the following issues

The licensee should provide general commentary on data assurance allowing specific comments on individual costs to be provided under Section 3.
General Comments Northern Ireland Electricity Networks Limited (NIE Networks) has populated the Metering RIGs template for the relevant RP6 reporting periods with information sourced from various financial and volume systems. A significant mapping exercise has been undertaken to ensure that the data is presented in a manner consistent with the RIGs definitions. This has involved significant resources from across the business with the relevant knowledge. NIE Networks recognises that both the UR and NIE Networks will continue to learn through the development of RIGs. NIE Networks welcomes any feedback for consideration in future submissions. It is important to note that all costs reported by NIE Networks in the Metering RIGs workbooks are solely **'Direct Costs'** as per UR instructions, with the exception of the with the exception of costs included within columns Q-AF in M1b' Meter purchase (memo) and specific costs within M4 - Total Metering Capex which are indirect costs. ***Systems overview*** NIE Networks has used a number of bespoke and proprietary systems to manage the information that has contributed to the collation of data for completion of the Metering RIGs worksheets. In terms of volume data, the majority of the relevant information collected for RIGs is extracted from our SAP ISU System via Business Objects Crystal Reports. These reports have been designed specifically with RIGs reporting in mind and therefore reflect our best attempts to directly reconcile our business activities with the relevant RIGs reporting categories. Other systems used to facilitate Metering RIGs volume reporting include the Meter Reading LiveQ system which contains information relating to meter reading activities such as scheduled meter reads and the volume of successful meter reads obtained. Information relating to costs have been extracted from our SAP Finance system and allocated to the correct programme of work through application of relevant apportionment and allocation rules. All apportionment and allocations have been applied in a manner largely consistent with previous RIGs submissions; however, NIE Networks has attempted to continually improve reporting at a granular level and has thus adjusted apportionment and allocations accordingly. Notwithstanding that NIE

Networks do not report costs at this level (other than for the purposes of RIGs) the changes do not impact the integrity of the overall information provided.

Overview of Allocation Rules

In terms of Metering Services NIE Networks primarily collects volume information at a programme work level. There are 10 main work programmes reflecting those with a specific unit cost regulatory allowance for RP6. These are as follows: -

1. SOSA Credit
2. SOSA Keypad
3. Commercial
4. Credit Certification/Re-certification
5. Keypad Re-Certification
6. Commercial Re-Certification
7. Telemeter/Teleswitch Replacement,
8. NI Customer Load Profiles
9. Revenue Protection: Keypad Replacement and,
10. Large Scale Metering Projects.

Volume information for Metering Services is collected at each of these programme levels based on unique job codes reported on within SAP ISU. These jobs have then been mapped to the relevant RIGs categories for the purposes of RIGs reporting.

Meter Reading volumes are collected from information contained within our Meter Reading LiveQ system. This information has then been allocated to the relevant RIGs reporting category; Domestic, Keypad and Commercial based on the type of meter being read and the relevant customer type.

How Costs are Collected

The costs associated with metering are collected within the SAP finance system within the categories listed below;

From SAP	What is included	Type of Cost
Cost Centres	E.g. Administration & Management, Finance, HR, IT, Control Centre, etc.	Predominately Indirect
Internal Order Numbers	Costs split out into Labour, Materials and BIS	Labour = Direct Materials = Direct BIS = Direct

For the purposes of the Metering RIGs only the **Direct Costs** are being reported; as per UR instructions with exceptions as noted above.

Direct costs in relation to metering are generally collected through internal order numbers; the costs within the internal order numbers are split between main sub-categories; Labour, Materials and Bought in Services.

Each metering work programme has specific internal order numbers associated with it allowing costs to be directly attributed. Any other relevant direct costs have been then manually allocated to the correct programme of work.

Cost allocations have been verified and reconciled in order to ensure accuracy.

Data Assurance Methodology

NIE Networks continues to use the 'Data Assurance Guidelines Methodology' for this Metering RIGs submission as outlined in previous RIGs submissions.

NIE Networks has attempted to continuously improve and refine our RIGs reporting processes since the initial RIGs submission and these improvements have been reflected primarily through the improved data assurance scoring in subsequent RIGs submissions.

Glossary

A description of terms used in this commentary is provided below:

- NIE Networks - Northern Ireland Electricity Networks Limited.
- RIGs – Regulatory Instructions Guidelines.
- SAP – (Systems, Applications, Products) NIE Networks corporate reporting system.
- RIO – (RIGs and Internal Orders) RIGs reporting and Internal Order creation system.
- UR – Utility Regulator.
- BIS – Bought in Services.
- DAG – Data Assurance Guidelines.
- HHU – Hand Held Unit

3. Commentary tables for the Reporting Workbook

3.1 The Navigation ('Nav') worksheet

3.1.1 Key, version submission control and worksheet sections

Please detail any suggested edits and rationale for these
Change Year / s to 2018 – 2023 consistent with other RIGs reporting workbooks
Additional commentary/documentation

3.2 The Change Log worksheet

Please detail any suggested edits and rationale for these
Additional commentary/documentation

3.3 The M1a – Metering Services worksheet

Please detail any suggested edits, including any definitions or edits to the definitions provided as per the guidance notes and rationale for these edits or definitions.
Insert Extra row in 'All' (Summary) section in relation to Recertification: NI Customer Load Profiles.
Additional commentary/documentation
Approach taken in populating M1a – Metering Services Volumes M1a Metering Services has been populated using information from our SAP-ISU system and represents actual volumes for the relevant RIGs reporting years. Volumes data has been matched as closely as possible into RIGs format given there are significantly more field activity categories than there are RIGs line items. Volume information for metering is collected at each of these programme levels based on unique job codes within SAP ISU. These jobs have then been mapped to the relevant Metering RIGs categories. Costs Costs are not collected at the level of disaggregation required by M1a but at a programme level e.g. SOSA Credit, Commercial metering etc. Therefore, in populating M1a, we have apportioned costs on the basis of volume which explains why, for example, all SOSA Credit work categories are reporting the same unit cost. Excluded Volumes & Costs Metering work volumes associated with transactional services or connections activities which are charged directly to suppliers or customers have been excluded from M1a as they do not feature as part of the regulatory entitlement which is being reported on within this area. Consequently, row 127 'Customer Contributions' & row 128 'Cost recoveries' have zero values. Zero Entries End of life - replacement meter: This item does not have any entries, as the activity is covered within the certification and recertification categories. 1Φ Ind/Com (SR) & 1Φ Ind/Com (MR): These items do not have any entries as there are no reported metering activities of this type. There is no present supplier requirement or valid supplier tariff for this configuration of connection and meter. Other Comments Change of usage - requested by supplier: With the exception of new connections and revenue protection activity, this category includes a variety of field activities arising from

supplier submitted market messages. Supplier requested activities may or may not require a meter change.

Repair / Inspection - meter not replaced: This item covers field activities where the meter is not replaced but may include the replacement of items such as tails, time switches, and other auxiliary metering equipment.

Revenue Protection – replacement meter: We have assumed this category specifically covers the agreed programme of work to replace those meters suspected of being subject to magnetic interference.

Metering Volumes – NIE Networks note that there has been a slight decrease in the overall metering volumes delivered in the 2022/23 RIGs period compared with the previous 2021/22 however these are largely in line with the RP6 periods.

SOSA Credit Metering Costs – NIE Networks note that the current 2022/23 unit cost associated with the SOSA Credit metering programme is adverse to the relevant regulatory allowance. NIE Networks have identified an overall general increase in the unit cost of the SOSA Credit metering volumes during RP6, this has been largely driven by the increasing customer demand for more specialised and complex metering configurations which carry higher costs.

SOSA Keypad Metering Costs – NIE Networks note that the current 2022/23 unit cost associated with the SOSA Keypad metering programme has increased vs the previous reporting period. However, NIE Networks would consider both 2021/22 & 2022/23 unit costs to be abnormally low reflecting the completion of less complex SOSA Keypad activities in these reporting periods and it is anticipated that this unit cost will increase and return to previous levels in future reporting periods.

Commercial Metering Costs – NIE Networks note the current 2022/23 unit cost associated with the Commercial metering programme has reduced compared to previous reporting period, however, it continues to be adverse to the relevant regulatory allowance and reflects increasing customer demands for more specialised and complex metering configurations which carry higher costs.

Credit Certification & Credit Recertification Costs – NIE Networks note the current 2022/23 unit cost associated with the Credit Certification & Credit Recertification metering programme has reduced vs the previous reporting period. This reduction in the unit cost is mainly as a result of the removal of most Covid-19 restrictions which had severely disrupted the efficient delivery of this metering work programme in previous reporting periods. NIE Networks feel that this unit cost will likely increase in the remaining RP6 periods due to increased difficulties in obtaining access to properties.

Keypad Recertification Costs – NIE Networks note the current 2022/23 unit cost associated with the Keypad Recertification metering programme has reduced vs the previous reporting period. This reduction in the unit cost is mainly as a result of the removal of most Covid-19 restrictions which had severely disrupted the efficient delivery of this metering work programme in previous reporting periods. NIE Networks feel that this unit cost will likely increase in the remaining RP6 periods due to increased difficulties in obtaining access to properties.

Commercial Recertification Costs – NIE Networks note that the 2022/23 Commercial Recertification unit cost has increased vs the previous reporting periods. This is due to

more complex labour and material intensive job types completed within this period. This increase in costs was called out in previous RIGs submissions and NIE Networks expect this cost to increase still further throughout the remainder of RP6 due to the Recertification of more complex and expensive meters in the future reporting periods.

Revenue Protection: Keypad Replacement – NIE Networks notes the current unit cost associated with the Keypad Recertification metering programme to be lower than the previous reporting period. This reduction in the unit cost is mainly as a result of the removal of most Covid-19 restrictions which had severely disrupted the efficient delivery of this metering work programme in previous reporting period.

HV Demand Customer Metering > 1MW – NIE Networks notes the current unit cost associated with the HV Demand Customer Metering > 1MW programme to be lower in this reporting period than originally projected due to some instances; where after a thorough examination of the equipment, some ancillary metering equipment was deemed eligible to be refurbished instead of requiring an outright replacement. Due to the metering equipment being assessed on site and on a case by case basis, NIE Networks are currently unable to ascertain whether or not the 'lower' cost per unit which is reported in this period will be repeated in future RP6 reporting periods.

HV Demand Customer Metering < 1MW – NIE Networks notes the current unit cost associated with the HV Demand Customer Metering < 1MW programme to be lower in this reporting period than originally projected due to some instances; where after a thorough examination of the equipment, some ancillary metering equipment was deemed eligible to be refurbished instead of requiring an outright replacement. Due to the metering equipment being assessed on site and on a case by case basis, NIE Networks are currently unable to ascertain whether or not the 'lower' cost per unit which is reported in this period will be repeated in future RP6 reporting periods.

Reconciliation between M1a and the Financial Data RIGs

In line with the RIGs definitions the costs below are included in the Financial Data RIGs but excluded from M1a Metering Services RIGs. The following table gives a breakdown of the reconciling differences between the Financial Data RIGs and M1a with all figures included in a nominal price base:

Metering Services Nominal £'000	**2022/23**
Metering RIGS	4,517
Add: Reconciling Differences	3,394
C&V RIGs (Direct)	7,911
C&V RIGs (Direct)	7,911
C&V Indirect Costs	3,214
C&V Total	**11,125**
Add: Pension Adjustment	356
Less: Non Network IT	(384)
Add: Non Cost RIGs	2
Less: Provisions	(29)
Financial Data RIGs	**11,070**

Provide specific commentary on assurance including an explanation of any accuracy of 3 or 4 and any process categorisation of high

As described above, M1a has been completed using our best endeavours and whilst we are confident in the overall integrity of our data, NIE Networks will continue to further develop its processes in order to improve the quality of our data and the robustness of our reporting mechanisms to ensure that the information is consistent and in the relevant format required.

Process Metric [Complexity] (Volumes) = H

NIE Networks acknowledges the significant complexity of its data particularly at a granular level due to the need to manually match field activities to the specified line items in M1a.

Process Metric [Manual Intervention] (Volumes) = H

NIE Networks accepts that there has been a sizable degree of manual intervention in terms of interpreting the information extracted from our systems and mapping the information into the relevant categories and we have reflected this in the scoring.

Process Metric [Control Framework] (Volumes, Total Direct Costs & Total Direct Costs – By Cost Type) = H

NIE Networks recognises that improvements are required in terms of its overall control mechanisms in relation to the RIGs reporting process and will endeavour to further develop these.

Process Metric [Historical Errors and Audit] (Volumes, Total Direct Costs & Total Direct Costs – By Cost Type) = H

NIE Networks has scored the cost element of this as high due to the fact that no audit has been undertaken with regards to this area within the last five years.

3.4 The M1b – Meter Purchase (memo) worksheet

Please detail any suggested edits, including any definitions or edits to the definitions provided as per the guidance notes and rationale for these edits or definitions.
Inserted three additional rows for extra space.
Additional commentary/documentation
Approach taken in populating M1b – Meter purchases (memo) M1b has been completed using information extracted from our SAP information system, actual costs and volumes have been used in respect of the relevant RP6 reporting periods based on relevant purchase orders and invoices recorded within SAP Finance. Costs and Volumes have been allocated to the relevant years based on the invoicing date. We have included all relevant delivery cost within the total cost figures. The Procurement cost line is treated as an indirect cost but has been included at the request of the UR. In order to attain this cost figure NIE Networks has taken the total cost of procurement allocated to Metering and excluded Stores and other Supply Chain costs. We have then estimated what portion of this cost is applicable to meter purchasing activities based on the advice of NIE Networks Procurement Department. [redacted] (Rows 8 & 10) are an important component of keypad meter costs. It should be noted that it is not a recording instrument and therefore does not have a certification period. [redacted] (Rows 16, 23 & 24) are not recording instruments and therefore do not have a certification; however, they are important components in relation to our half hourly meters and therefore we believe these should be included within this information workbook. [redacted] (Rows 17 & 26) are not recording instruments and therefore do not have a certification; however, they are important components in relation to the functioning of the meters and therefore we believe these should be included within this information workbook. [redacted] (Rows 29 & 30) are non-standard metering components which have been purchased as for of a specific Smart Metering Trial and do not have a certification life.
Provide specific commentary on assurance including an explanation of any accuracy of 3 or 4 and any process categorisation of high
None

3.5 The M2 – Meter Reading worksheet

Please detail any suggested edits, including any definitions or edits to the definitions provided as per the guidance notes and rationale for these edits or definitions.
None
Additional commentary/documentation
Approach taken in populating M2 – Meter Reading worksheet Actual costs and volumes have been used in respect of the relevant RP6 reporting periods. Volume information is based on the data extracted from our 'Meter Reading LiveQ system'. As per the UR request the volumes reported within this workbook represent successful meter readings only. Meter reading direct costs are captured at a programme level and not by meter reading category. The direct costs allocated to each category in M2 are based on the volume of successful meter reads as this is considered a reasonable cost driver. Therefore the annual unit costs are the same for each category of meter reads in any given year. **Other Comments** 'Domestic' This line has been populated using the number of domestic credit meter readings obtained as a result of meter reading visits. This includes readings provided by customers as a result of meter readers leaving a card. This line does not include scheduled domestic keypad meter readings which are reported separately ('Keypad'). 'Commercial' This line has been populated using the number of commercial quarterly meter readings obtained as a result of meter reading visits. This includes readings provided by customers as a result of meter readers leaving a card. 'Industrial' Readings for industrial customers are obtained using data collection software from half hour on-line meters. The associated costs are mainly IT and telecommunication related and are reported within our Enduring Solution Opex and other IT cost lines. As these are not reflected in our meter reading cost line, the volumes of on-line meter readings obtained have been excluded from M2, and this is consistent with the approach adopted in previous submissions. 'Keypad' This line has been populated using the number of keypad meter readings obtained as a result of meter reading visits. This includes readings provided by customers as a result of meter readers leaving a card.

'Special Reads'
Special reads are carried out by metering electricians as a transactional service at the request of suppliers. It is not classified as a meter reading costs and therefore the volumes and costs of these activities have not been included in M2. Consequently, row 24 'Customer Contributions' & row 25 'Cost recoveries' have zero values.

Reconciliation between M2 and the Financial Data RIGs

In line with the RIGs definitions the costs below are included in the Financial Data RIGs but excluded from M2 Meter Reading RIGs. The following table gives a breakdown of the reconciling differences between the Financial Data RIGs and M2 with all figures included in a nominal price base:

Meter Reading Nominal £'000	**2022/23**
Metering RIGS	4,032
Add: Reconciling Differences	148
C&V RIGs (Direct)	4,180
C&V RIGs (Direct)	4,180
C&V Indirect Costs	2,177
C&V Total	**6,357**
Add: Pension Adjustment	260
Less: Non Network IT	(272)
Add: Non Cost RIGs	2
Less: Provisions	(21)
Financial Data RIGs	**6,326**

Provide specific commentary on assurance including an explanation of any accuracy of 3 or 4 and any process categorisation of high

In scoring the accuracy of the data provided, it should be noted that we do not collect costs at the level of disaggregation required by M2. Moreover, the potential for more accurate cost recording in future is made more difficult because these activities are not carried out by distinct meter reading teams; i.e. for efficiency of operations, any given meter reader will likely be scheduled to take readings from domestic, commercial and keypad meters in the course of their working day.

Therefore, in populating M2, we have apportioned costs between Domestic, Commercial and Keypad meter reading on the basis of volume which explains why, for example, each of these categories are reporting the same unit cost for any given year.

3.6 The M3 – Certification Profile worksheet

Please detail any suggested edits, including any definitions or edits to the definitions provided as per the guidance notes and rationale for these edits or definitions.
Inserted additional Column 'AP' and adjusted formula in Column 'AR' to include Meters last certified in 2023.
Additional commentary/documentation
Approach taken in populating M3 – Certification Profile Certification Lives It is our understanding that the Utility Regulator is working to update meter certification lives as specified in the Northern Ireland Meter Certification Regulations. Consequently, and consistent with previous RIGs submissions, we have populated the M3 workbook based on the definitions which are currently applied by Ofgem. Data Matching The NIE Networks meter population reported in the M3 template is based on a data extract from SAP ISU at 31st March 2023 This data indicates the volumes of each meter type for which certification has expired with reference to Schedule 4 of the GB Certification Regulations applied by Ofgem. All meters have the manufacturer's year of certification recorded in calendar years in NIE Networks' systems. This does not align with the current RIGs reporting period ending on the 31st March 2023. Due to the design of the workbook, we have chosen 2022 as the 'Reporting Year' (cell B3) in order for the workbook to calculate the volume of uncertified meters at 31st March 2023. The RIGs certification profile workbook requires categories to be completed by generic meter type e.g. "Domestic Single Rate" and "Domestic Multi Rate", as opposed to manufacturer type. We have used the Schedule 4 as a guide to map specific meter types into the relevant categories required. Many generic meter types are multi-functional in that they can operate as a single rate meter or a multi rate meter depending on the tariff set by the supplier. As the costs and certification lives of each variant are identical, for the purposes of completing the workbook it has been assumed that all programmable meters are single rate.

Disaggregation of the number of installed programmable meters would merely indicate supplier tariff activity which has no influence on certification activity.
Provide specific commentary on assurance including an explanation of any accuracy of 3 or 4 and any process categorisation of high
None

3.7 The M4 – Total Metering Capex worksheet

Please detail any suggested edits, including any definitions or edits to the definitions provided as per the guidance notes and rationale for these edits or definitions.
Type commentary here
Additional commentary/documentation
Actual costs have been used in respect of the relevant RP6 reporting periods in line with the defined licence term. All costs have been reconciled to the Financial data RIGs:

Metering Capex Nominal £'000	**2022/23**
Metering RIGS	6,698
Add: Reconciling Differences	298
Financial Data RIGs	**6,996**
Reconciling Difference	
Pension Adjustment	298

Provide specific commentary on assurance including an explanation of any accuracy of 3 or 4 and any process categorisation of high
Process Metric (Historical Errors and Audit) (Metering Overheads & Indirect Costs) = H NIE Networks has scored this as high due to the fact that this is a relatively new requirement and therefore no audit has been undertaken with regards to this area within the last five years.

4. Commentary tables for the Assurance Workbook

4.1 Introduction

4.1.1 For the Electricity Distribution Cost and Volumes RIGs Assurance Workbook we set out the categories of commentary as follows:

4.2 The Navigation ('Nav') worksheet

4.2.1 Key, version submission control and worksheet sections

Please detail any suggested edits and rationale for these
Type commentary here
Additional commentary/documentation
Type commentary here

4.3 The Change Log worksheet

4.3.1 All

Please detail any suggested edits and rationale for these
Type commentary here
Additional commentary/documentation
Type commentary here

4.4 Metrics worksheet

4.4.1 2018 Data Assurance

For each line item in the 2018 regulatory year, where 'Total Risk = Critical' or 'Total Risk = High' please describe the reasoning behind this judgement and the steps which are being undertaken to reduce the risk.
Type commentary here
Additional commentary/documentation
All data assurance scoring for the 2017/18 (6 Month) H2 RIGs reporting year has been scored in a manner consistent with previous RIGs Submissions. The 2017/18 H2 Data Assurance document did not identify any categories where the 'Total Risk' was either critical or high.

4.4.2 2019 Data Assurance

For each line item in the 2019 regulatory year, where 'Total Risk = Critical' or 'Total Risk = High', and where the reasons for the 2018 year no longer apply, please describe the reasoning behind this judgement and the steps which are being undertaken to reduce the risk.
All data assurance scoring for the 2018/19 RIGs reporting year has been scored in a manner consistent with previous RIGs Submissions. The 2018/19 Data Assurance document did not identify any categories where the 'Total Risk' was either critical or high.
Additional commentary/documentation
None

4.4.3 2020 Data Assurance

For each line item in the 2020 regulatory year, where 'Total Risk = Critical' or 'Total Risk = High', and where the reasons for the 2019 year no longer apply, please describe the

reasoning behind this judgement and the steps which are being undertaken to reduce the risk.
All data assurance scoring for the 2019/20 RIGs reporting year has been scored in a manner consistent with previous RIGs Submissions. The 2019/20 Data Assurance document did not identify any categories where the 'Total Risk' was either critical or high.
Additional commentary/documentation
None

4.4.4 2021 Data Assurance

For each line item in the 2021 regulatory year, where 'Total Risk = Critical' or 'Total Risk = High', and where the reasons for the 2020 year no longer apply, please describe the reasoning behind this judgement and the steps which are being undertaken to reduce the risk.
All data assurance scoring for the 2020/21 RIGs reporting year has been scored in a manner consistent with previous RIGs Submissions. The 2020/21 Data Assurance document did not identify any categories where the 'Total Risk' was either critical or high.
Additional commentary/documentation
None

4.4.5 2022 Data Assurance

For each line item in the 2022 regulatory year, where 'Total Risk = Critical' or 'Total Risk = High', and where the reasons for the 2021 year no longer apply, please describe the reasoning behind this judgement and the steps which are being undertaken to reduce the risk.

All data assurance scoring for the 2021/22 RIGs reporting year has been scored in a manner consistent with previous RIGs Submissions. The 2021/22 Data Assurance document did not identify any categories where the 'Total Risk' was either critical or high.
Additional commentary/documentation
None

4.4.6 2023 Data Assurance

For each line item in the 2023 regulatory year, where 'Total Risk = Critical' or 'Total Risk = High', and where the reasons for the 2022 year no longer apply, please describe the reasoning behind this judgement and the steps which are being undertaken to reduce the risk.
All data assurance scoring for the 2022/23 RIGs reporting year has been scored in a manner consistent with previous RIGs Submissions. The 2022/23 Data Assurance document did not identify any categories where the 'Total Risk' was either critical or high.
Additional commentary/documentation
None

4.4.7 2024 Data Assurance

For each line item in the 2024 regulatory year, where 'Total Risk = Critical' or 'Total Risk = High', and where the reasons for the 2023 year no longer apply, please describe the reasoning behind this judgement and the steps which are being undertaken to reduce the risk.

Additional commentary/documentation

Version Control

Version	Date	Description
2.00	23/5/16	Formal Issue
3.00		RP5 reporting template
4.00	17/5/19	Amended for RP6 timings and to include Total Metering Capex reporting requirement