



Our response to Ofgem's RIO-ED2 Draft Determination Consultation Questions

Annex 1: SPEN Engineering Justification Papers
Review

August 2022

SPEN Engineering Justification Papers Review

SPEN are fully supportive of the engineering justification review process adopted by Ofgem at Draft Determination and strongly support the approach to adjustments associated with Engineering Justification Papers (EJPs). We look forward to continued engagement with Ofgem supporting this process through to Final Determination.

In response to Ofgem's Draft Determination engineering review of SPEN's 132 EJPs, please see the list below of EJP addendums being submitted as additional justification for the 24 EJPs which were deemed "partially justified" or "unjustified" by Ofgem. These addendums have been prepared in line with discussions with Ofgem at bi-laterals and via SQ responses, with the intention to provide the additional justification required for these EJPs to be considered as "Justified" for Final Determination.

All addendums have been subject to an external assurance process, reflective of the approach taken for EJPs at final business plan submission. We have included our independent external review assurance report for reference

Table 1 Draft Determination Response EJP Addendums

Document Number	Scheme Name
ED2-LRE SPEN-001-CV2-EJP-ADD	Reinforcement of LV Services
ED2-LRE-SPEN-002-CV2-EJP-ADD	HV and LV Network Reinforcement
ED2-LRE SPM-011-CV3-EJP-ADD	SPM 33kV RMUs Fault Level Mitigation
ED2 NLR(A)-SPEN-001-CV5-EJP ADD	Diversions
ED2-NLR(A)-SPEN-001-ENV-EJP-ADD	Environment Noise Pollution
ED2-NLR(A)-SPEN-001-QOS-EJP-ADD	Quality of Supply
ED2 NLR(A)-SPEN-001-RES EJP ADD	Electricity System Restoration (ESR)
ED2-NLR(A)-SPEN-001-SAF-EJP ADD	Legal & Safety
ED2-NLR(A)-SPEN-001-SWGTX EJP-ADD	Secondary Substations
ED2-NLR(A)-SPEN-002-RES-EJP-ADD	Condition Driven Civils
ED2-NLR(A)-SPEN-002-SAF-EJP ADD	Site Security
ED2 NLR(A)-SPEN-003-ENV-EJP ADD	Management of Persistent Organic Pollutants (POPs) Polychlorinated Biphenyls (PCBs)
ED2-NLR(A)-SPEN-003-RES-EJP-ADD	Flood Resilience
ED2-NLR(A)-SPEN-003-SAF-EJP ADD	Fire Protection
ED2 NLR(A)-SPEN-003-UG-EJP-ADD	LV Underground Cable Modernisation
ED2-NLR(A)-SPEN-005-ENV-EJP-ADD	Carbon Offsetting
ED2-NLR(A)-SPEN-005-RES EJP ADD	Rising Lateral Mains

ED2-NLR(A)-SPM-009-OHL-EJP- ADD	4ZC Route 132kV Overhead Line Major Refurbishment
ED2-NLR(O)-SPD SPM-001 TEL EJP	SPD & SPM Telecoms Resilience Improvement *
ED2-NLR(O)-SPEN-001-DSO-EJP	Distribution System Operation (DSO) Infrastructure
ED2 NLR(O)-SPEN-001-ENV-EJP	Visual Amenity
ED2-NLR(O)-SPEN-001-WSC-EJP	Worst Served Customers
ED2-NLR(O)-SPEN-005-RTS-EJP	RTS Control System Training Simulator

*Please note this addendum includes additional justification for two EJPs (ED2-NLR(O)-SPD-001 TEL EJP & ED2 NLR(O) SPM-001 TEL-EJP)