
Revised SONI Regulatory Instructions and Guidance Consultation

SONI Response to UR

6th January 2023



Introduction

SONI welcomes the opportunity to respond to the Utility Regulator's (UR) Consultation on the Revised SONI RIGs Guidance Consultation published on 17th November 2022.

SONI has been proactively engaging with the UR throughout 2022 on the format and requirements of its Annual Cost/Outputs Reporting and the associated Regulatory Instructions and Guidance (RIGs), most notably within the context of alignment to the 2020-2025 SONI Price Control. The process, to date, has been productive and beneficial to all parties.

Through its continuing engagement with the UR, SONI has had a platform to voice any concerns over the annual cost reporting, and as such we will only use this response to address one key area of concern and the consultation questions presented. We will continue to work with the UR to ensure a compliant and satisfactory conclusion and publication of the SONI Guidance for SONI.

1) Do you consider that the preferred option reporting requirements are reasonable or should be increased / decreased?

The reporting requirements overall are considered reasonable by SONI. We note the significant increase in regulatory reporting obligations and have been working to ensure we have the processes in place to facilitate these new requirements.

2) Is there other information regarding cost and performance which the TSO should be reporting?

SONI considers the information regarding cost and performance being requested gives a detailed and transparent illustration of all its annual activities and costs. As such we do not believe there is any need for additional information to be provided.

3) Would additional reporting by cost area be beneficial?

SONI considers the extent of its reporting obligations to be satisfactory and fit-for-purpose.

4) Should network data and KPI reporting be included in the RIGs?

SONI considers that network data and KPI reporting will be facilitated via the Evaluative Performance Framework process. To include this in the RIGs will lead to duplication of effort and we consider this to be inefficient.

5) What should the publication obligations on the TSO be?

SONI believes that a process would need to be undertaken to ensure any commercially sensitive information is redacted prior to publication.

Area of Concern

SONI does not agree with the inclusion of the tab T21 – Staff Resource matrix. It is unclear what value this information will bring to the UR or stakeholders as there are limited options for any comparisons or benchmarking.

We would also emphasise that over the coming months SONI will be considering its organisational structure based on the SONI Governance decision and we recommend that this tab is not included until the changes needed to comply with Condition 42 are completed. To complete this work now would not be pragmatic. SONI recommends that this reporting requirement is considered further as part of the next price control and is removed from this version of the RIGs.

In addition, SONI does not recognise the value from the inclusion of the SOC codes reporting (Also tab T21). We recommend that this information should be included in the SONI Price Control Process rather than annual reporting.

Finally, if the UR decides to include the Staff Resource Matrix tab, SONI would have concerns surrounding its ability to complete its report for the 31st Jan 2023 submission deadline, as it is unclear if the guidance will be in place within this timeframe.

Conclusion

In conclusion we welcome and support the UR's redesign of the reporting template, however we consider Option 2 to be the optimum solution and not Option 3 – Enhanced Staff reporting.