

## **Phoenix Energy's response to the Utility Regulator's Revised Gas Distribution RIGs Consultation**

Phoenix Energy<sup>1</sup> has engaged extensively with the Utility Regulator (UR) on the development of the revised Regulatory Instructions and Guidance (RIGs) for the annual reporting process of gas distribution network operators (GDNs) for the GD23 price control period in advance of this consultation publication.

This process allowed for detailed consideration of the information we currently report on and has resulted in a template which aligns with the outcomes of UR's GD23 Final Determination and reduces the regulatory burden on GDNs by addressing:

- any duplication of reporting arrangements
- any information which is no longer required, and
- the format of the reporting template itself.

It also allowed us to seek clarity from UR on its asks. We are therefore confident that the streamlining of information provision and extension of the reporting template to cover the six-year price control period, will allow for easy comparison of performance each year and against the wider GD23 Final Determination deliverables. It is worth highlighting that the template structure will only be tested for accuracy once we make our first submission in June 2024 for the 2023 reporting year. Any structural issues will be reported upon as part of our 2023 submission.

Phoenix Energy has been submitting commentary as part of its annual reporting process for several years and, along with our comments within the template itself, has provided UR with all the information it considered necessary to date. We welcome the clarifications provided by UR on the two new requirements, Part 13: Emerging Issues and Part 14: Additional Reporting. We will capture these within our existing commentary framework and welcome further engagement and feedback from UR following our 2023 annual submissions if any further improvements could be made to address any issues in understanding and requirements.

Finally, we note a typo at paragraph 1.17. The gas annual reporting submissions relating to 2023 are due 30<sup>th</sup> June 2024 as detailed at paragraph 2.10, not 31<sup>st</sup> March 2024.

In conclusion, we welcomed the engagement with UR on development of the annual reporting template for GD23 and look forward to continuing to work with UR if further opportunities to streamline the template are identified during the price control period.

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<sup>1</sup> Phoenix Energy Group Ltd is trading as Phoenix Energy