#	Date raised	Description	Challenge	Link to Criteria	Owner	GD2 Representative	Due date for response	Response by NGN	CEG view	Additional Actions	CEG Further View Challenge Closed?
C:	L 11/10/201	Evidence requested on rationale for strategic approach to differing future energy scenarios	NGN should demonstrate:  • What strategic approach it has taken in relation to future energy scenarios;  • What evidence they have based those assumptions on;  • How stakeholders views have influenced that strategic approach;  • How that approach has impacted different areas of the plan;  • What mitigations have been established to deal with changes in Government policy	Overall BP Evaluation: Long Term Planning	Gareth Mills (NGN)	Dave Pearson	10/06/2019		The WoS report addresses the issues raised in detail JS	Deep dive session in September revealed more work was needed on the Whole System strategy but that it had improved substantially and addressed many of the points raised in previous sessions 30/9	All 5 elements of the challenge have been addressed fully in V3 of the BP (received 4 Nov)and supporting evidence referenced has been referenced in the WS strategy appendix  This challenge closed by JS on 7/11
CZ	2 11/10/202	Further information requested on how risks to changing approach on Customer Surveys will be managed	NGN should demonstrate how any changes to customer surveys will allow for ongoing analysis across a baseline that includes GD1	Output Evaluation: Stakeholder Engagement/Meeting the Needs of Customers and Network Users	Eileen Brown (NGN)	Birgit Hilgers	15/07/2019	9 C02 Challenge Response	We recognise the final decision will be Ofgem's but we note the positive leadership by NGN to improve the customer surveys to reach more customers in a more customer friendly way while preserving comparability to GD1. The written response seems reasonable although provides assurance rather than evidence. If the new survey is available before the BP is submitted CEG would wish to map across to GD1 survey 2 August 2019	Trial of the survey is controlled by Ofgem and will not be complete until spring.	Challenge closed by JS 7/11  Note that NGN have proposed a bespoke Output to collect additional customer feedback to help shape future services. Welcomed by CEG
C	3 12/11/202	Further information requested on approach to measuring customer satisfaction during GD2.	NGN should demonstrate that customer satisfaction output targets proposed within the Plan are directly relevant to customer's expectations.	Output Evaluation: Meeting the Needs of Customers and Network Users	Eileen Brown (NGN)	Birgit Hilgers	15/07/2019	9 <u>CO3 Challenge Response</u>	Accept the proposal to trial the new methodology prior to the start of GD2, the point relating to targets being set at industry level is understood and proposed trial seems reasonable. CEG note that changes have been made in line with customer feedback	NGN to provide feedback on the outcome of the trials and CEG subgroups on customer service outputs to review the findings.  updated 2/8/19	Trials to take place over winter period. Therefore no further evidence before V3 BP submitted 30/9 Challenge closed by JS 7/11. See comment for Challenge 2 above
C4	1 12/11/202	Evidence requested that loss of supply targets have been designed to have most impact.	NGN should demonstrate that outputs targets relating to loss of supply within the Plan are impact centric (i.e. broken down according to seasonality, customer type)	Customers and Network Users	Greg Dodd (NGN)	Birgit Hilgers	26/04/2019	.9 <u>CO4 Challenge Response</u>	CEG notes the intentions to enhance standards and minimise disruption but will await evidence or demonstration of how these will impact in the detailed proposals within the draft BP at the end of May.	cEG will need to ensure the vulnerability strategy is impact centric update 2/8/19 slide 7 of Customer Value Proposition presented on 19/9 identifies the additional benefit of the restoration of supply standard proposed. 30/9	Specific Challenge closed.  Additional comment NGN proposing quicker response times in BP with additional support to vulnerable Y customers via the hardship fund and higher compensation payments for failing to meet reconnection times  JS 7/11
C	5 12/11/202	Evidence requested that loss of supply targets have been designed to have most impact.	NGN should demonstrate how proposals within the Plan on asset health translate into better outcomes for customers.	Output Evaluation: RIIO Requirements	Greg Dodd (NGN)	Birgit Hilgers	10/06/2019	9 <u>C05 Challenge Response</u>	CEG view - full explanation provided of approach NGN will be taking.	None but CEG will take deep dive into the monetised risk metric. ( scheduled for August meeting JS 25/07).	reports explained at deep dive session. Costs subgroup to look in detail at Engineering reports for highest cost areas plus selection of other output areas on random selection basis.  Y 30/9 11/11/19 Challenge closed CEG content that NGN applying NARMs methodology and have shown options.
C	5 12/11/202	Evidence required that shippers have been adequately engaged	NGN should demonstrate that shippers have been engaged in respect of the Offtake Meter Error output target and that their feedback is reflected within the Plan.		Greg Dodd (NGN)	Birgit Hilgers	10/06/2019	9 <u>C06 Challenge Response</u>	CEG view - content	CEG to check NGN highlight shippers views in the BP. (Dave Wright to review and comment on October version of the BP - JS 25/07)	Challenge closed.  3 bespoke Outputs (Reputational) to improve services to shippers/suppliers establishing key account services y following survey in 2016 and ongoing discussion with these stakeholders  JS 7/11
C	7 12/11/202	Further information requested on robustness of approach on telemetered faults.	h NGN should demonstrate how it has quantified and assessed its approach to telemetered faults.	Output Evaluation: Reliability Specific Criteria	Greg Dodd (NGN)	Birgit Hilgers	10/06/2019		CEG view - CEG note that NGN will not need to demonstrate its approach to handling telemetered faults to Ofgem	None	JS 7/11 No further comments on this
C	3 12/11/202	Evidence required that approach to social issues is benchmarked.	NGN should demonstrate how proposals within the Plan for social activity benchmark against best in class.	Output Evaluation: <b>Meeting the Needs of Customers and Network Users</b>	Tom Bell (NGN)	Birgit Hilgers	26/04/2019	9 CO8 Challenge Response	The response hinges upon the definition of benchmarking and best in class. If 'best in class' is defined as 'when compared against other GDNs' then the feedback relating to Ofgem is helpful and encouraging. If it was intended to be broader than direct comparators then it may not fully resolve the challenge.	Welcome the AA1000 comments on engagement and further explanation of the Three Hands comments, of that exercise, the learning taken from it and the way in which those findings have influenced the business planning.  Challenge still open until deep dive into vulnerability/social purpose strategy happens in September where evidence of benchmarking performance should be provided Updated 2/8/19  Deep dive session on 19/9 - no discussion of benchmarking but Ofgem comparators included in the V1.1 BP 30/9	30/9 deep dive session focussed on the effectiveness of the customer and social competency framework and gave examples of measuring performance (in relation to training) to other GDNs. Slide 2 from deep dive. Shows NGN performing better than other GDNs 30/9. Ofgem still engaging on FPNES targets and deliverability. May be different changes through reopener if Govt priorities change V 3 BP includes further stretch targets - some beyond stakeholder expectations Challenge closed by JS 7/11
CS	) 12/11/202	Further information required on the strategic objectives that proposals seek to deliver against	NGN should demonstrate the wider strategic context against which social proposals within the Plan seek to align and impact that those proposals will have within that context.	Output Evaluation: RIIO Criteria	Tom Bell (NGN)	Birgit Hilgers	26/04/2019	9 C09 Challenge Response	NGN have captured lessons learned in GD1	Demonstrate understanding of wider strategic context for social objectives and what social outcomes and impacts will be achieved in BP proposals (e.g. Fuel poverty strategy goals Ofgem vulnerability strategy)	Vulnerability strategy to be reviewed in September with evidence that the outcomes match the social context updated 2/8/19. Information about the regional context was provided in the BP V1.1 but this will be further reviewed in V2 30/9 V 3 includes context for decisions on social action including role of other partners. Further evidence in Vulnerability Strategy JS - challenge closed 7/11
C:	12/11/202	Evidence that stakeholders have been adequately engaged and the plan supports their needs.	NGN should demonstrate that proposals within the Plan for any investment over and above licence obligations have the support of stakeholders.	Output Evaluation: <b>Enhanced Engagement</b>	Tom Bell (NGN)	Birgit Hilgers	26/04/2019	9 C10 Challenge Response	Content that the presentation given on 26/4 and the written answer in the slide pack adequately address this challenge at this stage. Reassurance is taken from the 'deep dive group's monitoring of this issue.	Expect this challenge area to be a significant part of the business plan review process. Deep dive group commented on BP acceptability survey and are monitoring responses. Awaiting results 2/8/19	Sound evidence in the Insights report and stakeholder views are widely reflected in the bespoke Outputs and enhanced service targets . Challenge closed. But more refined comments on some specific areas will be included in the CEG report  JS 7/11
C:	12/11/201	Evidence that stakeholders have been adequately engaged and the plan supports their needs.	NGN should demonstrate that stakeholders support the scale of activity being proposed within the business plan for social activity, in particular that the business is 'going far enough'	Output Evaluation: <b>Stakeholder Engagement</b>	Tom Bell (NGN)	Birgit Hilgers	26/04/2019	91(11 ( hallenge Resnonse	CEG view - note evidence from Pioneer workshop and agree NGN response appears appropriate.	Note further Challenge comments in the minutes of the April meeting. Leave challenge open pending further feedback from stakeholder engagement and the way in which that insight feeds through into the business plan Ongoing until final version updated 2/8/19	V3 includes an increased hardship fund in response to CEG challenge that it was not responding to need. Other stakeholder views less challenging on this s area. Fair compromise reached. Support to third parties in communities included recognising their role.  Overall reflected customer feedback Challenge closed JS 7/11
C	12/11/202	Evidence required to demonstrate deliverability of proposals.	NGN should demonstrate that barriers to improving the customer journey for connections have been considered alongside the innovation required to make it happen and how customers without access to digital technologies will be looked after.	Output Evaluation: RIIO Criteria	Karen Robinson (NGN)	Birgit Hilgers	26/04/2019	O.C.1.2 Challenge Pernance	With specific reference to the customer journey for connections, CEG are content that the presentation made by Birgit Hilgers on 26/4 adequately addresses this challenge, evidences the approach and demonstrates innovation in shift patterns.	Dependent on any further stakeholder views from the engagement programme and possible concerns about the digital technologies point. Subgroup still to review updated 2/8/19 check V2 BP	V3 includes a clear rationale supported by stakeholders and customer complaints feedback for improved customer services relating to connections. SAP4Hana was introduced in September 19 and is being rolled out. Y This allows 18 months to embed the systems before start of GD2. Commitment to support non digital customers Challenge closed 7/11 JS

C13	12/11/2018 Evidence required to demonstrate deliverability of proposals.	NGN should demonstrate that the organisational change activity required to deliver the improved customer journey for connections is in place or planned.	erall Business Plan Criteria: <b>Deliverability</b>	Karen Robinson (NGN)	Birgit Hilgers	26/04/2019	C13 Challenge Response	The need to demonstrate that organization change activity (particularly the new IT platform) is legitimately able to support commitments made within the business plan is broader than just for connections. This is an operational matter for NGN but the CEG must be satisfied with the deliverability of commitments.	NGN present outcome of any changes in October version of BP (or earlier iterations) and CEG to review in deep dive to ensure appropriate changes being put in place. Work force resilience plan should be scrutinised in October in deep dive group JS - 25/07.	Workforce resilience strategy not produced until 4/11. Further consideration by CEG 11/11/19 CEG considered and closed staff development on SAP4Hana on connections timescales
C14	12/11/2018 Evidence required to demonstrate deliverability of proposals.	NGN should demonstrate that risks to delivery of new I.T. systems required to deliver the new customer journey for connections have been considered and planned for.	tput Evaluation: RIIO Criteria	Karen Robinson (NGN)	Birgit Hilgers	26/04/2019	C14 Challenge Response	The need to demonstrate that the new IT platform is able to support commitments made within the business plan is broader than just for connections.	CEG recognise the inherent risks on introducing new IT systems but recognise commitment by NGN that that proposed changes to improve services will go ahead irrespective, and any additional costs will be born by NGN not customers if the new IT system has not been fully developed and alternative systems are required.  Additional actions - present any adjustments to implementing new IT systems in final BP and show evidence from trials. Note that during trials no problems arose.	Specific challenge considered closed after testing system but wider IT trials Y still open
C15	Evidence required of suitability of proposals to all	NGN should demonstrate that any impacts to vulnerable customers as a risk of the move to a digital connections  Out	tput Evaluation: RIIO Criteria	Karen Robinson	Birgit Hilgers	26/04/2019	C15 Challenge Response	content with NGN response at this stage	Will depend on any stakeholder feedback from engagement sessions.	Specific Challenge closed Y
C16	12/11/2018 Evidence required for suitability of NGN's communications to customers with complex	customer journey have been understood and mitigated.  NGN should demonstrate how communications to customers with language/sight/hearing/speaking difficulties is effective.	tput Evaluation: RIIO Criteria	Eileen Brown (NGN)	Birgit Hilgers	26/04/2019	C16 Challenge Response	content with NGN response at this stage	Will depend on any stakeholder feedback from engagement sessions.	Specific Challenge closed Y
C17	Further information requested on approach to end to end customer journey.	NGN should demonstrate how it will link to other providers within the customer journey on connections to ensure the	tput Evaluation: RIIO Criteria	Karen Robinson (NGN)	Birgit Hilgers	26/04/2019	C17 Challenge Response		Only if stakeholder feedback from the engagement programme requires different response	Specific Challenge closed Y
C18	12/11/2018 Evidence required of customer support for proposals	Customer receives as a holistic end to end experience  NGN should demonstrate the cost implications and customers willingness to pay for any proposals within the Business Plan to Out improve the customer journey for connections	tput Evaluation: Stakeholder Engagement	Karen Rohinson	Birgit Hilgers	23/08/2019	C18 Challenge Response	content that anticipated cost impact was set out and understood		Specific Challenge closed Y
C19	12/11/2018 Evidence required that targets are based on best data.	NGN should explain why smart meter data isn't being used	tput Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers	26/04/2019	C19 Challenge Response	Content with response.	in draft BP in July.	Challenge Closed Y
C20	12/11/2018 Further information required on how proposals align with and deliver wider decarbonisation objectives.	NGN should demonstrate how it is contributing to national decarbonisation policy through the plan across both environment and futures.	tput Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers	26/04/2019		NGN planning to address the Challenge but no evidence provided on how it relates to outputs.		Updated Environmental Action Plan sets out the contribution the outputs will have on air quality and decarbonisation. to be reviewed by SPr on 4/10.  30/9  Additional information provided on 6/11 clarifies succinctly how NGN have met this challenge. Much more focus on 2050 challenge and pathway in GD2. Challenge closed 7/11 JS
C21	Evidence of understanding stakeholder expectation post 21/12/2018 GD2.	NGN should demonstrate understanding of stakeholders' expectations post GD2	tput Evaluation: Stakeholder Engagement	Melanie Taylor	Melanie Taylor	10/06/2019	C21 Challenge Response	The presentation on 26/04/19 Stakeholder needs appear to being identified and acted on in shaping targets and activities etc.  Deep Dive group is satisfied with progress. Assessment on the interpretation of the customer stakeholder information to date will be very helpful in enabling us to determine how and whether the company is indeed responding to customer needs and issues. Additional Action:  Keep challenge open for ongoing review given relevance to CEG role.	CEG to review the appendices on customer insights to ensure the final plan reflects stakeholder expectations for post GD2 updated 2/8/19	Section 4 BP V1.1 (p 40)provides a table showing how customer needs will be met/exceeded/compromise. Links to stakeholder acceptability testing but need to check at October CEG meeting. CEG need to see a map of how outcomes map to stakeholder engagement 30/9 V3 BP makes clear links between customer feedback and Outputs. In relation to post GD2 Future Customers views included in Insights report and wider stakeholder, including CEG, priorities for improved environmental performance set out with pathway to 2050 incorporated. Specific challenge closed JS 7/11
C22	Evidence required to demonstrate who the 'seldom heard 21/12/2018 groups are and that they have been adequately engaged.	NGN should demonstrate who the 'seldom heard' groups are d' and how they have been engaged in the development of the	tput Evaluation: Stakeholder Engagement	Melanie Taylor	Melanie Taylor	10/06/2019	C22 Challenge Response	The presentation on 26/04/19 Stakeholder needs appear to being identified and acted on in shaping targets and activities etc.  Deep Dive group is satisfied with progress. Assessment on the interpretation of the customer stakeholder information to date will be very helpful in enabling us to determine how and whether the company is indeed responding to customer needs and issues. Additional Action:  Keep challenge open for ongoing review given relevance to CEG role.	Vulnerability strategy will be reviewed at the September meeting deep dive session ( JS - 25/07) Views of non vulnerable but seldom heard groups to identified be reflected in the Version 2 of the BP Updated 2/8/19	Definition of seldom heard and issues of engaging with those groups thrashed out in deep dive sessions. 79% of people engaged were first time and significant community engagement with bespoke sessions in home and offering translation services.  Specific challenge closed JS 7/11
C23	Evidence required to demonstrate how vulnerable 21/12/2018 customers have been adequately engaged.	NGN should demonstrate how vulnerable customers have been engaged in the development of the Business Plan	tput Evaluation: Stakeholder Engagement	Melanie Taylor	Melanie Taylor	10/06/2019	C23 Challenge Response	The presentation on 26/04/19 Stakeholder needs appear to being identified and acted on in shaping targets and activities etc.  Deep Dive group is satisfied with progress. Assessment on the interpretation of the customer stakeholder information to date will be very helpful in enabling us to determine how and whether the company is indeed responding to customer needs and issues. Additional Action:  Keep challenge open for ongoing review given relevance to CEG role.	Keep challenge open for ongoing review given relevance to CEG role Carole PK to report following deep dive session and production of	See comments above. Insights Report breakdown views from different groups. Trade offs and compromise areas explored. V3 links views to Outputs. Challenge Closed JS 7/11
		Out	tput Evaluation: Stakeholder Engagement				C24 Challenge Response	The presentation on 26/04/19 Stakeholder needs appear to being identified and acted on in shaping targets and activities etc.  Deep Dive group is satisfied with progress. Assessment on the interpretation of the customer stakeholder information to date will be very helpful in enabling us to determine how and whether the company is indeed responding to customer needs and issues. Additional Action:  Keep challenge open for ongoing review given relevance to CEG	Keep challenge open for ongoing review given relevance to CEG role. Propose Eddie Proffitt to discuss with Carole PK and decide whether engagement has been appropriate and report after October plan reviewedJS 25/07)	Will review at October session after review of the stakeholder evidence appendix and V2 of BP published. 30/9 Acceptability and WTP research captured the views of large users and these are weighted in the Insights report and reflected in the plan where trade offs have been made.
C24	Evidence required to demonstrate how high energy users 21/12/2018 have been adequately engaged.	NGN to demonstrate that high energy users have been engaged with in the development of the Business Plan		Melanie Taylor	Melanie Taylor	10/06/2019		TOIC.		Challenge closed JS 7/11 Y

							The Stakeholder Engagement Deep Dive Group identified a third-party provider who may have undertaken research into the			
							inherent social value of engaging with stakeholders (i.e. the value of the engagement itself as opposed to the benefit of any outcomes delivered in response to stakeholder feedback).			
							We have reviewed the outputs of the provider, Rose Regeneration, in relation to a programme of engagement with residents in			
							Barnsley. This report, 'Area Governance Arrangements Evaluation', has been shared with the Stakeholder Engagement Deep	The written answer provided to this challenge seems well		
		NGN should demonstrate that the inherent social value of engagement activity (separate to the value of business					Dive Group. Our review of that document indicates that all benefits analysed (described as social return on investment) are in relation to projects delivered in response to stakeholder engagement.	thought through albeit without specific evidence. That said, the challenge was essentially theoretical in nature and there is a		
		changes made as a result of engagement) undertaken to	Output Evaluation: Stakeholder Engagement				We fundamentally agree with the CEG's view that there is an inherent value to engaging customers. However, we have not been	common requirement in regulated price reviews for		l Y
		inform the plan has been measured.					able to find alternative research, or robust values that could form part of an analysis, into the inherent value of engagement	stakeholders' views to be appropriate accommodated. content for this to be closed.		
							However, we recognise that it is critical to be able to demonstrate how stakeholder's views have influenced our plan and the			
							benefits that the resulting plan will mean for customers. To this end we will use our Value Delivery Framework model to analyse			
	Evidence to demonstrate that the inherent social value o	ıf		Molanio Taylor	Molanio Taylor		the benefit of our proposals to customers using Treasury recognised values, supplemented with additional values we gain from			Challenge closed
21/12/2018	engagement activity has been measured.			Melanie Taylor	ivicianie raylor	20/04/2019	our customers through our Willingness to Pay research.			Challenge closed
								The presentation on 26/04/19 Stakeholder needs appear to being		Trade offs presented in V1.1. check any
								identified and acted on in shaping targets and activities etc.  Deep Dive group is satisfied with progress. Assessment on the		changes in V2 30/9
								interpretation of the customer stakeholder information to date	CEG to discuss with NGN when V2 plan is presented in September what	The Insights report shows different
			Output Evaluation: Stakeholder Engagement				<u>C26 Challenge Response</u>	the company is indeed responding to customer needs and issues.	trade offs may have been considered and made based on materiality updated 2/8/19	views from different stakeholder
		NGN should demonstrate that the materiality of stakeholder						Additional Action:		segments were treated in their analysis of feedback and to justify Outputs in V3
	Evidence that materiality of stakeholder feedback has	feedback has been considered when trading off views within						Keep challenge open for ongoing review given relevance to CEG role.		BP
6 21/12/2018	been considered.	the plan.		Melanie Taylor	Melanie Taylor	10/06/2019	NGN currently undertakes between 6/7000 PEMs jobs per annum. Around 70% of these jobs involve replacing the regulator and hose with only 30% therefore			JS Challenge closed
							replacing the meter. Where NGN replaces the meter, the replacement is always a traditional meter. NGN emergency engineers do not carry smart meters and			
							have not been fully trained in the installation of such meters. Very shortly it will not be possible to install a traditional meter as under legislation all new meter installations must be smart meters. NGN has obligations to attend all reported gas escapes and make safe but has no obligations to provide a meter			
							replacement service.			
							There are ongoing discussions with suppliers about the PEMs service going forward. NGN have offered to continue with a PEMs service based on the			
			Output Evaluation: RIIO Criteria				installation of a smart meter in "dumb" mode. We understand other GDNs are offering a similar service. About 50% of the suppliers are saying they don't want to take this service. British Gas for example have stated they wish to undertake all such work themselves. Where no PEMs contracts are in place with the			
							suppliers NGN would attend, make safe and refer the customer to their supplier.			
							For our GD2 plan we envisage that the number of emergency calls driven by meter (Inc. regulator and hose) problems should decrease significantly as under the			
							smart meter roll out we understand the regulator and hose would normally be replaced alongside the meter. Where we do attend the average length of time the emergency engineer would spend on site should be reduced as they would be undertaking fewer meter replacements. We don't envisage these changes			
		NGN to demonstrate the impact of changes to PEMS (Post					will have any significant impact on the overall costs of providing the emergency service which are primarily driven by the need to maintain 24/7 365 coverage	CEG content - no further issues raised by the group		
7 21/12/2018	PEMS.	Emergency Metering Services) arrangements		Stephen Parker	Stephen Parker	26/04/2019	to achieve the one hour response to publicly reported gas escapes.	following NGN response ( JS 25/07)		Challenge Closed Y
										Innovation 30/9
										The Innovation elements of the BP and
										Strategy were delivered at the start of
										November and the final version was much improved to clarify customer
										benefit/stakeholder engagement.
							C28 Challenge Pernance			Embedded innovation leading to
							C28 Challenge Response			monetised benefit and savings to customers in GD2.
										CEG to have final discussion on 11 Nov
										to agree when this challenge can be
		NGN to demonstrate value of innovation to customers –						CEG reviewed the draft July version of BP and raised some		closed (Baringa report not yet available to see GDN framework comparisons.
		not just costs saved or avoided but wider benefits such as						further challenges on how impacts were presented. The	The Innovation deep dive group will give consideration and	11/11/19 CEG agreed that information
	· ·		Output Evaluation: How will Innovation and R&D						ensure NGN set out the customer impacts in terms of cost savings	has been provided and challenge
21/12/2018	customers and wider benefits to stakeholders.	Authorities)	support RIIO and GD2	Richard Hynes-Coope	eGareth Mills	13/05/2019		specific customer impacts ( JS 25/07)	where possible in the final version of the plan ( JS 25/07)	closed. As above
		NGN to demonstrate how it compares to other GDNs by					<u>C29 Challenge Response</u>			11.11.19 CEG content that information
	Evidence to demonstrate comparisons other GDN's by	sharing the innovation measurement framework once	Output Evaluation: How will Innovation and R&D		a Carath Mill		C25 Challenge Response	Augiting Posings respect		has been clarified in deep dive and
9 21/12/2018	sharing innovation measurement framework.	completed.  NGN to provide CEG with further information on how	support RIIO and GD2	Richard Hynes-Coope	ggareth ivillis	13/05/2019		Awaiting Baringa report.	NGN to present when Baringa report available (from June)	report, challenge closed.
	Further information to be provided to CEG on how	innovation will impact on GD2 – JS and SPR happy to join a	· ·				C30 Challenge Response		CEG considered in deep dive session and will review in V2 and the	у
21/12/2018	innovation will impact GD2.	working group.	support RIIO and GD2	Richard Hynes-Coope	Gareth Mills	13/05/2019			Innovation strategy JS 25/07)	As above Original Challenge closed
	NGN to consider if any remists to be a second of the secon	NGN to consider if appropriate to be a local and a local	Output Evaluation: Cost-man Cost in Cost							V3 BP includes enhanced compensation
	NGN to consider if appropriate to have standard GSOP or reinstatement.		Output Evaluation: Customer Service Specific Evaluation Criteria			15/07/2019	C31 Challenge Response			payment and reduced from 5 to 3
14/01/2019		- Christate Herita	Eraisación entena	Eileen Brown (NGN)	Rirgit Hilgory			CEG content with response which explains the Ofgem GSOP JS 25/07)	Deep dive group looking at how NGN is going further than Ofgem standards and will comment after V2 JS 25/07)	calendar days Challenge closed JS 7/11
14/01/2019				Elicen brown (NGN)	Direct Hilders					V3 and EAP state land remediation at
	NON INC. THE CONTRACT OF THE C									<u>.</u>
	NGN to justify additional outputs for remedial	Nove to the state of the state								gas holder sites to meet statutory
		NGN to justify additional outputs for remedial environmental Opex.	Output Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers	15/07/2019	<u>C32 Challenge Response</u>			requirements. Enhanced environmental
	environmental Opex.	NGN to justify additional outputs for remedial environmental Opex.	Output Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers	15/07/2019	C32 Challenge Response			requirements. Enhanced environmental sites to encourage biodiversity at 200
	environmental Opex.	NGN to justify additional outputs for remedial environmental Opex.	Output Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers	15/07/2019		CEG content with response JS 25/07)	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11
e	environmental Opex.	NGN to justify additional outputs for remedial environmental Opex.	Output Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers	15/07/2019		CEG content with response JS 25/07)	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out
e	environmental Opex.	NGN to justify additional outputs for remedial environmental Opex.	Output Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers	15/07/2019		CEG content with response JS 25/07)	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But
e	environmental Opex.	NGN to justify additional outputs for remedial environmental Opex.	Output Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers	15/07/2019		CEG content with response JS 25/07)	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But engineering justification reports will be
e	environmental Opex.	Opex.	Output Evaluation: Kilo Criteria	Neil Whalley (NGN)	Birgit Hilgers	15/07/2019		CEG content with response JS 25/07)	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But
2 14/01/2019	environmental Opex.  NGN to provide evidence on analysis forecasts for repair	NGN to provide evidence on analysis forecasts for repair	Output Evaluation: RIIO Criteria  Output Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers			CEG content with response JS 25/07)	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But engineering justification reports will be reviewed when published with V2 on 1 October 30/9
2 14/01/2019	environmental Opex.	NGN to provide evidence on analysis forecasts for repair	Output Evaluation: Kilo Criteria	Neil Whalley (NGN)	Birgit Hilgers			CEG content with response JS 25/07)	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But engineering justification reports will be reviewed when published with V2 on 1 October 30/9 11/11/19 CEG content for challenge to
2 14/01/2019	environmental Opex.  NGN to provide evidence on analysis forecasts for repair	NGN to provide evidence on analysis forecasts for repair	Output Evaluation: RIIO Criteria  Output Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers			CEG content with response JS 25/07)	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But engineering justification reports will be reviewed when published with V2 on 1 October 30/9
2 14/01/2019	environmental Opex.  NGN to provide evidence on analysis forecasts for repair	NGN to provide evidence on analysis forecasts for repair	Output Evaluation: RIIO Criteria  Output Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers			CEG content with response JS 25/07)	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But engineering justification reports will be reviewed when published with V2 on 1 October 30/9  11/11/19 CEG content for challenge to be closed EJPs and V3 provide further information on all proposed works. CEG to still understand how the 30km target
2 14/01/2019	environmental Opex.  NGN to provide evidence on analysis forecasts for repair	NGN to provide evidence on analysis forecasts for repair	Output Evaluation: RIIO Criteria  Output Evaluation: RIIO Criteria	Neil Whalley (NGN)	Birgit Hilgers		C33 Challenge Response		The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But engineering justification reports will be reviewed when published with V2 on 1 October 30/9  11/11/19 CEG content for challenge to be closed EJPs and V3 provide further information on all proposed works. CEG to still understand how the 30km target was arrived at
2 14/01/2019	environmental Opex.  NGN to provide evidence on analysis forecasts for repair	NGN to provide evidence on analysis forecasts for repair	Output Evaluation: RIIO Criteria  Output Evaluation: RIIO Criteria		Birgit Hilgers  Dave Pearson	13/05/2019	C33 Challenge Response		The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)  Further analysis during deep dive sessions and review of specialist	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But engineering justification reports will be reviewed when published with V2 on 1 October 30/9  11/11/19 CEG content for challenge to be closed EJPs and V3 provide further information on all proposed works. CEG to still understand how the 30km target was arrived at
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2 14/01/2019 3 14/01/2019	NGN to provide evidence on analysis forecasts for repair volumes (Emergency & Repair Opex)	NGN to provide evidence on analysis forecasts for repair	Output Evaluation: RIIO Criteria  Output Evaluation: RIIO Criteria			13/05/2019	Covered verbally in CEG meeting on 13/05/19  Investment in the replacement of steel mains >2" diameter is not mandatory and so needs to be justified on the basis that it is beneficial to the customer and wider society.  As well as using internal NGN expertise, we have joined with the other GDNs in pooling data and engaged with external experts (Advanced Engineering Solutions Ltd, together with Newcastle University's department for industrial statistics) to assess the	Detailed response with the presentation provided to CEG JS 25/07)	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)  Further analysis during deep dive sessions and review of specialist	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But engineering justification reports will be reviewed when published with V2 on 1 October 30/9  11/11/19 CEG content for challenge to be closed EJPs and V3 provide further information on all proposed works. CEG to still understand how the 30km target was arrived at For final discussion and further
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14/01/2019	NGN to provide evidence on analysis forecasts for repair volumes (Emergency & Repair Opex)  Evidence requested on rationale for increase in steel replacement in GD2.	NGN to provide evidence on analysis forecasts for repair volumes (Emergency & Repair Opex)  Demonstrate the steel replacement rational for increase in GD2 – need to understand the risk/impact.	Output Evaluation: RIIO Criteria Cost Driver: Emergency and Repair	Mike Charlton  Tony Pearson	Dave Pearson	13/05/2019	Covered verbally in CEG meeting on 13/05/19 Investment in the replacement of steel mains >2" diameter is not mandatory and so needs to be justified on the basis that it is beneficial to the customer and wider society.  As well as using internal NGN expertise, we have joined with the other GDNs in pooling data and engaged with external experts (Advanced Engineering Solutions Ltd, together with Newcastle University's department for industrial statistics) to assess the current and likely future performance of steel mains. These analyses have shown that steel mains are deteriorating at a rate faster than they are being replaced.  For GD2, we are proposing to increase our rate of replacement for steel mains >2" diameter from the GD1 average of approximately 15km / year to 30km/year. This will deliver value for money for customers using a CBA model with a 16-year payback period.  Covered verbally in CEG meeting on 13/05/19  The direct impact on individual customers (i.e. consumers of gas) will be small, as it is anticipated that there are very few (if any) services attached to residual stubs and so the need to interrupt supplies will be minimal. There will be an impact on wider stakeholders because of the necessary street works activities, which will be mitigated in the usual way. This will be minimised	Detailed response with the presentation provided to CEG JS 25/07)  Content with response JS 25/07 subject to review of steel replacement report review by AL JS 25/07)  CEG were content with the explanation in the deep	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)  Further analysis during deep dive sessions and review of specialist reports on steel replacement by AL JS 25/07)  AL review steel report and further deep dive in August by full CEG on costs/outputs JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But engineering justification reports will be reviewed when published with V2 on 1 October 30/9  11/11/19 CEG content for challenge to be closed EJPs and V3 provide further information on all proposed works. CEG to still understand how the 30km target was arrived at For final discussion and further explanation at 11/11 CEG meeting  Y  See comments above 11/11/19 Challenge Closed  Additional comment - rationale for
2 14/01/2019 3 14/01/2019	NGN to provide evidence on analysis forecasts for repair volumes (Emergency & Repair Opex)  Evidence requested on rationale for increase in steel replacement in GD2.	NGN to provide evidence on analysis forecasts for repair volumes (Emergency & Repair Opex)  Demonstrate the steel replacement rational for increase in GD2 – need to understand the risk/impact.	Output Evaluation: RIIO Criteria Cost Driver: Emergency and Repair  Output Evaluation: RIIO Criteria	Mike Charlton  Tony Pearson	Dave Pearson  Tony Pearson	13/05/2019	Covered verbally in CEG meeting on 13/05/19 Investment in the replacement of steel mains >2" diameter is not mandatory and so needs to be justified on the basis that it is beneficial to the customer and wider society.  As well as using internal NGN expertise, we have joined with the other GDNs in pooling data and engaged with external experts (Advanced Engineering Solutions Ltd, together with Newcastle University's department for industrial statistics) to assess the current and likely future performance of steel mains. These analyses have shown that steel mains are deteriorating at a rate faster than they are being replaced.  For GD2, we are proposing to increase our rate of replacement for steel mains >2" diameter from the GD1 average of approximately 15km / year to 30km/year. This will deliver value for money for customers using a CBA model with a 16-year payback period.  Covered verbally in CEG meeting on 13/05/19 The direct impact on individual customers (i.e. consumers of gas) will be small, as it is anticipated that there are very few (if any) services attached to residual stubs and so the need to interrupt supplies will be minimal. There will be an impact on wider stakeholders because of the necessary street works activities, which will be mitigated in the usual way. This will be minimised through the use (where possible and beneficial) of the innovative "E-SEAL" technique developed by NGN and Steve Vick	Detailed response with the presentation provided to CEG JS 25/07)  Content with response JS 25/07 subject to review of steel replacement report review by AL JS 25/07)  CEG were content with the explanation in the deep	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)  Further analysis during deep dive sessions and review of specialist reports on steel replacement by AL JS 25/07)  AL review steel report and further deep dive in August by full CEG on costs/outputs JS 25/07)	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But engineering justification reports will be reviewed when published with V2 on 1 October 30/9  11/11/19 CEG content for challenge to be closed EJPs and V3 provide further information on all proposed works. CEG to still understand how the 30km target was arrived at  For final discussion and further explanation at 11/11 CEG meeting  Y  Challenge closed  Additional comment - rationale for stubs additional work load included in V3 with EJPs  Y
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32 14/01/2019 33 14/01/2019 35 14/01/2019	environmental Opex.  NGN to provide evidence on analysis forecasts for repair volumes (Emergency & Repair Opex)  Evidence requested on rationale for increase in steel replacement in GD2.  NGN to assess the likely impact on customers whilst stub replacement work is carried out.  Demonstrate efficiency gains from innovation and that NGNs revised innovation strategy addresses the updated Ofgem methodology.  NGN to demonstrate the process for identifying overcrossings at risk from flooding.	Demonstrate the steel replacement rational for increase in GD2 – need to understand the risk/impact.  Evidence of the likely impact on customers whilst stubs replacement work is carried out.  Demonstrate efficiency gains from innovation. NGN's revised innovation strategy needs to address the updated Ofgem methodology (CEG to set up a working group to review the	Output Evaluation: RIIO Criteria Cost Driver: Emergency and Repair  Output Evaluation: RIIO Criteria  Output Evaluation: RIIO Criteria  Output Evaluation: RIIO Criteria	Mike Charlton  Tony Pearson  Tony Pearson	Dave Pearson  Tony Pearson  Tony Pearson	13/05/2019	Covered verbally in CEG meeting on 13/05/19 Investment in the replacement of steel mains >2" diameter is not mandatory and so needs to be justified on the basis that it is beneficial to the customer and wider society.  As well as using internal NGN expertise, we have joined with the other GDNs in pooling data and engaged with external experts (Advanced Engineering Solutions Ltd, together with Newcastle University's department for industrial statistics) to assess the current and likely future performance of steel mains. These analyses have shown that steel mains are deteriorating at a rate faster than they are being replaced.  For GD2, we are proposing to increase our rate of replacement for steel mains >2" diameter from the GD1 average of approximately 15km / year to 30km/year. This will deliver value for money for customers using a CBA model with a 16-year payback period.  Covered verbally in CEG meeting on 13/05/19 The direct impact on individual customers (i.e. consumers of gas) will be small, as it is anticipated that there are very few (if any) services attached to residual stubs and so the need to interrupt supplies will be minimal. There will be an impact on wider stakeholders because of the necessary street works activities, which will be mitigated in the usual way. This will be minimised through the use (where possible and beneficial) of the innovative "E-SEAL" technique developed by NGN and Steve Vick international in the early years of GD1.  C36 Challenge Response	Detailed response with the presentation provided to CEG JS 25/07)  Content with response JS 25/07 subject to review of steel replacement report review by AL JS 25/07)  CEG were content with the explanation in the deep presentation/ discussions in May JS 25/07)	The review of the Environmental Action Plan will further ensure this approach is fully embedded in the BP JS 25/07)  Further analysis during deep dive sessions and review of specialist reports on steel replacement by AL JS 25/07)  AL review steel report and further deep dive in August by full CEG on costs/outputs JS 25/07)  No further actions JS 25/07)  Deep dive sessions into V1 noted that some cost efficiencies have been highlighted but the next version will include a Waterfall' which totals savings of all environmental programmes and innovations JS 25/07)  Further deep dive session in to costs in August will provide	requirements. Enhanced environmental sites to encourage biodiversity at 200 sites set out in BP and in EAP. Challenge Closed JS 7/11  AL reviewed steel report which sets out the industry view that steel is corroding more quickly than anticipated. But engineering justification reports will be reviewed when published with V2 on 1 October 30/9  11/11/19 CEG content for challenge to be closed EJPs and V3 provide further information on all proposed works. CEG to still understand how the 30km target was arrived at For final discussion and further explanation at 11/11 CEG meeting  Y  Challenge closed  Additional comment - rationale for stubs additional work load included in V3 with EJPs  Peep dive on 14/10 but innovation section in V1.1 indicates projects it plans to include under the new funding methodology (decarbonisation and vulnerability). Embedded efficiencies from innovation in GD1 set out but could be strengthened.  30/9  Embedded cost savings from GD1 set out in the BP V3 and strategy and examples of individual innovation projects provided. Challenge closed JS 7/11  Original challenge closed

C38 15/02/201	NGN to consider hydrogen mix impact on shrinkage	When will blending mix in gas pipes become significant? Has NGN considered hydrogen mix impact on shrinkage and wider business plan in future scenarios.	Long Term Planning/Consistent view of the future	e Stephen Parker	Stephen Parker	13/05/2019	C38 Challenge Response	CEG content with response - JS 25/07)		Challenge Closed. Additional information linked to 2050 set out in V3 JS 7/11
	NGN to demonstrate how unidentifiable gas can be addressed in the NGN Business Plan?	e How can unidentifiable gas be addressed in the NGN Business Plan?					C39 Challenge Response	CEG content with this response - also discussed during deep dive session in July and key gas of concern is		
39 15/02/201	Evidence that there are no specific regionally driver	n Evidence that there are no specific regionally driven		e Stephen Parker	Stephen Parker	13/05/2019	C40 Challenge Response	methane to be address under Repex programme JS 25/07)  Analysis of BP context provided regional economic analysis - NGN asked to reference fully Leeds University as		Challenge Closed Y
C40 11/03/201	investment criteria to underpin the business plan.		Cost Justification Managing Uncertainty	Stephen Parker	Stephen Parker	30/06/2019		source. Also further points recorded in notes from that session (JS 25/07)		Original Challenge closed Y
							C41 Challenge Response	NGN still working on the detail. During deep dive session CEG identified linked challenges on wider customer benefits from environmental programmes such as air	NGN explained that their Environmental Action Plan and V2 plan	SPr deep dive on 4/10.  JS reviewed the plan on 28/9 and commented positively and improved links to customer benefits  30/9  EAP and V3 BP set out more clearly customer benefits and link to customer preferences from Insights report
	Demonstrate that targets for repair are stretching (from GD1) and sensitive to the impact of differing kinds or escapes.	Demonstrate that targets for repair are stretching (from GD1) and sensitive to the impact of differing kinds of escapes.	Output Evaluation: <b>Meeting the needs of</b> consumers and network users: Emergency &		Birgit Hilgers	13/05/2019	C42 Challenge Response	Content with response but need to consider again in the deep dive session on costs and outputs when the final		Challenge closed JS 7/11  Repex proposals demonstrate lower unit costs but greater volume of work/more complex work. Some further discussion on 30/11 before finally closing this challenge
26/04/201		s Demonstrate that the Business Plan has considered NGN's	Repair	Dave Pearson	Dave Pearson	31/05/2019		costs have been calculated JS 25/07)	August deep dive session will focus on Repex costs  Deep dive group may review again in deep dive session o the vulnerability strategy in September JS 25/07)	11/11/19 CEG content, challenge closed Y  Original challenge closed
C43 26/04/201	wider role in corporate social responsibility, over and above the specific BP social outputs.	d wider role in corporate social responsibility, over and above		Tom Bell	Birgit Hilgers	31/05/2019	C43 Challenge Response	Full response provided	No further review of this 30/9	Challenge completed with V3 and Vulnerability strategy JS 7/11 Y
	Demonstrate that the suggested activities delivered within the social outputs do not duplicate the work of	Demonstrate that the suggested activities delivered within the social outputs do not duplicate the work of other agencies and how any advice provided will be designed to meet recognised standards.			Birgit Hilgers	31/05/2019	C44 Challenge Response		NGN have spelled out how they expect to interact and partner with other agencies	Challenge Closed  Details of partners and roles set out in the BP and strategy  IS 7/11
20,04,203	designed to meet recognised standards.	Standards.	consumers and network users	Elicen brown	Digit ringers	31/03/201		VI BI 33 23/07/	30/3	V1.1 report much clearer in capturing efficiencies from GD1. Deep dive SPr
C45 26/04/201	during GD1, or due to be embedded, have formed the foundation for each outputs area.	d NGN to clearly demonstrate how innovations embedded during GD1, or due to be embedded, have formed the foundation for each outputs area.		h Richard Hynes-Coone	d Ringit Hilgans	31/05/2019	C45 Challenge Response	Review of V1 and deep dive sessions by CEG - can see further work has been done to show what is embedded.  JS 25/07)	NGN to consider revising the format of the report to more clearly set out what has been embedded under performance under GD1	
	NGN to demonstrate the customer benefit of the plan's innovation strategy.	Demonstrate the customer benefit of the Plan's innovation strategy.	Business Plan Content – Our Innovation Approach				9 Covered under challenge C28	This should not be a separate challenge. Will be dealt with under challenge number 28 JS 25/07 Close challenge JS 25/07)		Challenge Closed JS 7/11 reviewed and further discussion on Challenge 28. This challenge closed Y
	Demonstrate that governance processes sitting behind innovation allow for timely exit from projects that are unlikely to deliver anticipated benefits.	Demonstrate that governance processes sitting behind innovation allow for timely exit from projects that are	Business Plan Content – Our Innovation Approach			31/08/2019	C47 Challenge Response Deep Dive	Requested governance structure around Innovation in deep dive session - expecting NGN to produce in their updated Innovation strategy document - to review in October JS 25/07)	Deep dive on 14/10 but V1.1 indicates governance processes in place and involvement of wider stakeholders	Governance processes reviewed in place and described in V£ BP . Criteria for innovation projects set out and external stakeholder engagement to bring wider perspective.  Challenge Closed JS 7/11  Y
C48 13/05/201	Fully explain and evidence the decision-making strategy driving increase in maintenance (how the model is being applied to the asset base)	Fully explain and evidence the decision-making strategy driving increase in maintenance (how the model is being applied to the asset base)		Ne	Neil Pike	31/08/2019	C48 Challenge Response Deep Dive	Was subjected to scrutiny in deep dive session and noted	Deep dive into costs illustrated how NGN are using Totex and planning to reduce maintenance costs for gas holders but increase	further analysis of V2 appendices and
C49 15/07/201	NGN to clearly demonstrate Totex	Explain the £83m return to customers claim (Page 9 of V1.0 of BP (clarify how Totex works and over what period – as currently set out it suggests that the return has all made during RIIO 1 period not over 40 years)	Output Evaluation: <b>Our Performance</b>		Gareth Mills		9 Explanations provided to CEG in meetings.	Explanation accepted during the costs deep dive session in August.  (30/9	30/9	Original Challenge closed Y
C50 15/07/201	NGN to demonstrate they have looked what's out there in larger market if this brings value to customer.	NGN to demonstrate that they have investigated the larger market for Innovative ideas if this brings value to customer.	Output Evaluation: Innovation & Competition	Richard Hynes-Coope		19/09/2019	C50 Challenge Response	Accept NGN response - but need to review the Baringa IMF.		To discuss on 11/11. Baringa report still outstanding 11.11.19 Clarity on process and procurement processes have been provided and challenge closed y
	NGN to demonstrate strong governance framework which will give confidence in purpose of intent (Innovation Org Chart) process in place.	NGN to demonstrate strong governance framework which will give confidence in purpose of intent (Innovation Org Chart) process in place.		Richard Hynes-Coope		19/09/2019	C51 Challenge Response	Accept NGN response - see above		As above 11.11.19 CEG content with explanation and also covered in V3 Business Plan. Challenge closed  y
	Constructive Challenge, Innovation NGN to look at overarching benefit not just investment as cost.	Constructive Challenge, Innovation NGN to look at overarching benefit not just investment as cost.					C52 Challenge Response			Customer benefits now highlighted with more outcomes focus to new NIA proposals. CEG to agree 11/11 11.11.19 Value framework captures and
C52 15/07/201	How do NGN measure the beneficial impact of Innovation to the customer and how can this be documented?	How do NGN measure the beneficial impact of Innovation to the customer and how can this be documented?	Output Evaluation: Innovation & Competition	Richard Hynes-Coope	eStephen Parker	19/09/2019	C53 Challenge Response	Accept NGN response - see above		challenge closed  Reflected in Acceptability testing and highlighted in the insights report to show where commercial customer views differ and how trade offs reached.
C53 15/07/201	Resolving customer complaints, NGN to consider the potential to push further on the threshold for		Output Evaluation: Innovation & Competition	Richard Hynes-Coope	eStephen Parker	19/09/2019	C54 Challenge Response	Accept NGN response - see above		JS 7/11 challenge closed  Bespoke Outputs and enhanced compensation payments included in the
C54 15/07/201	penalty.	NGN to explain the improvements to emissions reductions	Output Evaluation: Meeting the Needs of Customers	Eileen Brown	Greg Dodd	19/09/2019	29/10/19: EAP contained in Version 2 of the business plan identified relative %s that mandated mains replacement and other activities contribute to gas leakage reductions. Additional breakdown of benefits provided in latest EAP based on cost-benefit analysis calculations.	Deep dive on 19.09.19		plan and linked to WTP/WTA Challenge closed JS 7/11 Y
C55 15/07/201	Demonstrate improvements to emissions reductions NET of the HSE Mandated replacement programme.	NET of the HSE mandated replacement programme (and cross reference with section 8 on environmental target costs)  NGN to make very explicit links between the two strategies - Environmental Strategy link with the	Output Evaluation: <b>Deliver an Environmentally Sustainable Network, Shrinkage &amp; Leakage</b>	Neil Whalley	Greg Dodd	04/10/2019	15/07/19 Can be covered in deep dive on 04/10/19 but it remains a work in progress as we are currently recalculating our shrinkage forecasts. We are also currently working alongside the other GDNs to determine a robust method to calculate the shrinkage benefits delivery by pressure management and MEG conditioning as no such method currently exists.	Accept response	Confirm whether final presentation	For discussion 11/11 11.11.19 Covered in Environmental section (CEG INFLUENCED)  y
C56 15/07/201		Innovation Strategy, as they are being finalised, and to show the financial or other benefits to customers/stakeholders from the actions/outputs in the strategies. The 'So What' aspect of the work should be explained – e.g. reduced noise/better traffic flow, better	Output Evaluation: <b>Deliver an Environmentally Sustainable Network</b>	No:I M/b - II	Grow Dadd	45 (07 (0.5	29/10/19: EAP contained in Version 2 of the business plan identified links between the Innovation Strategy and EAP. Examples provided demonstrating customer benefits.  15/07/19 Changes have been made to draft v2 to provide clearer links between innovation and environment. This will be firme up in the final business plan submission.	d		Strong links between innovation and EAP in V3
	Demonstrate the past 5 years offtake bookings.	Demonstrate offtake bookings – show what it is has been for last 5 years, history (how do we know that 505 hasn't been inflated). Need to show past as well as current	Output Evaluation: <b>Commitments to Our</b>		Greg Dodd	15/07/2019	C57 Challenge Response	V1.1 illustrated a much clearer link. 30/9  Response in deep dive needs to translate into updated text in V2 of the plan		Challenge closed JS 7/11 Y  Response evidenced in V3
C57 15/07/201	What justification do we have for stating we'll connect 1000/2000 homes to the grid each year?	What justification do we have for stating we'll connect 1000/2000 homes to the grid each year?	Customers, Maintaining a Safe & Resilient Networ		Greg Dodd	23/08/2019	C58 Challenge Response	30/9  Response shows rationale for the targets and	Note ongoing discussions beyond BP submission date between Ofgem and the GDNs regarding eligibility criteria and admin burdens which could impact deliverability. Using uncertainty	Challenge closed JS 7/11 Y
C58 19.09.19	Why has the figure decreased since GD1?	Why has the figure decreased since GD1?	4. Delivering better outcomes for our customers : 4.2.3 Help for those who need it most.		Eileen Brown	14/10/2019		assumptions behind the target figures which remain ambitious but deliverable		Challenge closed JS 7/11 Y
	effectiveness of the training we're providing to our engineers on vulnerability support and CO awareness?	What measures are we using to internally validate the effectiveness of the training we're providing to our engineers on vulnerability support and CO awareness?	4. Delivering better outcomes for our customers : 4.2.3 Help for those who need it most.		Eileen Brown	14/10/2019	C59 Challenge Response  C59 Challenge Response Deep Dive			Discuss on 11/11 11.11.19 CEG content with response will comment in report, challenge closed y

<u>C60</u>	14.10.19	NGN to reconsider the levels of investment in the proposed Hardship Fund.  Demonstrate that the procurement process will not	Given NGN's role in the community, it should do more to support those most in need and, specifically, the levels of investment in the proposed Hardship Fund should be reconsidered.  Demonstrate that the procurement process will not stop		Eileen Brown	Eileen Brown	C60 Challenge Response 11/11/2019			Increase in Hardship Fund to £150k a year from £30k to reflect CEG feedback balanced with other feedback. Challenge closed JS 7/11 Y 11.11.19 CEG content with response
C61	14.10.19	stop Innovation projects.	Innovation projects.	5.4 Driving efficiency through innovation and competition.	Stephen Parker	Richard Hynes-Cooper	r 11/11/2019 There is route to single source supply where you are undertaking an innovation project.			and explanation by NGN in meeting, challenge closed.
C62	14.10.19	NGN to clarify limitations on investment in installing renewable technology	NGN investment in installing renewable technology, clarify	6. Delivering Value for Money 6.5 Capex summary	Dave Pearson	Dave Pearson	6/11/19: Further details added to EAP Section 6.3 identifying NGN's renewable energy technology installation strategy. This confirms we intend to install renewable energy technology on all offices and depots during RIIO-2. Section now also identifies that wind and solar PV were considered for installation on gas infrastructure sites but has not been progressed due to potential security/trespasser enticement issues on remote, unmanned infrastructure sites (solar PV), energy generation not matching usage pattern resulting in a weak cost-benefit analysis outcome (solar PV) and potential equipment integrity risks from generation equipment failure (wind). We have considered installing renewable energy on the small number of redundant sites that we own, however we have not pursued that as the absence of an on site energy demand results in a weak cost-benefit	Explanation provided	None	Challenge closed JS 7/11
	14.10.19	NGN to clarify investment in non-engineering vehicle fleet		6. Delivering Value for Money 6.5 Capex summary	Dave Pearson	Dave Pearson	6/11/19: EAP has been revised to confirm latest decarbonised vehicle investment plans. Approximately 145 ultra-low emission or hybrid commercial vehicles will be purchased during RIIO-2 to replace existing diesel vehicles, meaning at least 25% of our commercial vehicle fleet of c.580 vehicles will be ultra low emission or hybrid by end RIIO-2. There is currently no foreseeable operationally suitable replacement for the c.325 3.5t diesel vans in our fleet, so these will be renewed to ensure they are all Euro 6 engine by end RIIO-2 as a minimum. We will continually review market offerings when investing in new vehicles to deliver decarbonisation of our fleet. Combined with our plans for our car fleet, by the end of RIIO-2 approximately 50% of our	Explanation provided and set out in EJP	None	Challenge closed JS 7/11.  CEG to take view on whether this is still adequately ambitious target  Y
	14.10.19	NGN to demonstrate how they will maintain the active, positive engagement.	NGN to demonstrate how they will maintain the active, positive engagement when they don't have a proposition, how will NGN keep Citizens Jury?	3. Giving consumers a stronger voice 3.4 Moving forward, together – our approach to stakeholder engagement	Melanie Taylor	Melanie Taylor	C64 Challenge Response 11/11/2019	Explanation provided	CPK attending next Citizens Jury on 16 November	Challenge closed JS 7/11. CEG to consider feedback from Citizens Jury and comment in CEG report on future engagement strategy
C65	14/10/201	NGN to demonstrate the outcomes that are tangible within the CVP document and where it relates back to what customer said in their engagement.	NGN to demonstrate the outcomes that are tangible within the CVP document and where it relates back to what customer said in their engagement.		Greg Dodd	Greg Dodd	04.11.19 Ove ARUP have been commissioned to work with NGN to assess the additional value within the GD2 business plan. All areas put forward for the CVP have been supported by customers and each output has now been evidenced by a specific customer insight in the upfront business plan and also in the outputs appendix. The CVP analysis will quantify the monetised benefit associated with each proposal ensuring tangible outcomes for consumers. A draft of the CVP output will be provided for the CEG on 4/11/2019.		CEG to discuss on 11/11	Challenge open until agree position on 11/11 JS 7/11 11.11.19 CEG agree challenge closed