



Geik Drever
Director of Pensions

Our Reference:

REF:DOP.LTRS.DCLG

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22 January 2013

Philip Perry
LGPS Regulations 2013
Department for Communities & Local
Government
Zone 5/G6 Eland House
Bressenden Place
London
SW1E 5DU

Dear Mr Perry

The Draft Local Government Pension Regulations 2013

Thank you for your letter dated 21 December 2012 seeking comments on the above draft regulations.

In general the draft regulations are in line with the proposals put forward in the summer and form one part of the set of regulations required for the new 2014 Scheme. We look forward to receiving the draft regulations on cost control and governance of the Scheme as this will be critical in assuring the new Scheme is, and will, remain affordable.

In the comments made by the Fund it has also considered the impact on the employer of regulations 4(1)(b), 10(7) and 21(3).

Our comments and observations on the technical aspect of the regulations are in Appendix A. As confirmed in the consultation document the regulations were issued without some of the new terms being defined, and without the transitional provisions which will deal with the arrangements between the new scheme and the old scheme. Without the full details it is difficult to provide an accurate assessment of the draft regulations as the full implication of some of the regulations may not be completely realised. It will be vital that the complete actual regulations for the new Scheme are available as early as possible in order to ensure all the system calculations, documents and processes are in place for April 2014. If you have any queries please do not hesitate to contact me.

Yours sincerely

Director of Pensions

Enc.
West Midlands Pension Fund

Visits can be made to the Fund's offices on the
5th Floor, Mander House, Wolverhampton
Opening hours: Monday - Thursday 8.30am - 5.00pm
Friday 8.30am - 4.30pm



The Government Standard