

Guidance

ET2 PCFM Guidance				
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This document provides instructions and guidance to licensed network operators to enable them to complete the reporting requirements associated with updating various variable values and performance data in the Price Control Financial Model (PCFM) during the Annual Iteration Process (AIP).

This document is part of the Regulatory Instructions and Guidance (RIGs) for RIIO-ET2.

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1. Introduction

Background

1.1. This document is part of the Regulatory Instructions and Guidance (RIGs) for RIIO-ET2. The term RIGs is the framework that allows Ofgem¹ to collect accurate and consistent information from network operators (licensees). Ofgem provides a Revenue Reporting Pack (RRP) and instructions and guidance for how licensees should fill the RRP for submission.

1.1.1.2. The PCFM Guidance This document provides network operators (licensees provides licensees) with information on how to fill out the revenue sheets within the RIIO-ET2 RRP. The data in the revenue sheets is used to calculate the vast majority of the Price Control Financial Model (PCFM) Variable Values and any underlying templates that feed into them, which they licensees are required to submit to us for each Annual Iteration Process (AIP).

1.2.1.3. It also sets out the required information that should be submitted to Ofgem in the supporting narrative commentary.

1.3.1.4. This document should be read in conjunction with chapter 2 of the ET2 Price Control Financial Handbook, which contains a detailed description of the PCFM modification process and the AIP dry run process. Additionally, this document should be read in conjunction with Appendix 1 ('Glossary') of the ET2 Price Control Financial Handbook. and with Part B of Special Condition 1.1 (Interpretation and Definitions).

Legal Framework

1.5. The modification and governance process for the PCFM Guidance is set out in Standard Special Condition A40³: Regulatory Instructions and Guidance ('the RIGs Licence Condition') of the electricity transmission licence conditions applicable to the Electricity Transmission Networks.

¹ Ofgem is the office of the Gas and Electricity Markets Authority. The Authority is established under section 1 of the Utilities Act 2000. The terms 'Ofgem', 'the Authority', 'we' and 'us' are used interchangeably in this document.

² This term is defined in Part B of Special Condition 1.1 (Interpretations and Definitions).

³ Where a reference is made to the licence, this is to standard conditions, standard special conditions and special licence conditions of the electricity transmission's licence applicable to the Electricity Transmission Networks.

1.4.1.6. The modification and governance process for the Price Control Financial Model (PCFM) and Price Control Financial Handbook (PCFH), collectively known as the Price Control Financial Instruments, is set out in Special Condition 8.1 (Governance of the ET2 Price Control Financial Instruments).

1.5. The modification and governance process for the PCFM Guidance and the steps of the Annual Iteration Process are set out in Special Condition 8.2 (Annual Iteration Process for the ET2 Price Control Financial Model).

Purpose

1.6.1.7. The purpose of this document is to provide guidance to enable the licensee to complete each dry run of an AIP that is submitted to Ofgem. As described in the-ET2 Price Control Financial Handbook, the dry runs process entails amending and confirming values for each Regulatory Year over a number of months, from 31 July4 August to early November, on an iterative basis to account for updates to the PCFM Variable Values as they become known.

1.7.1.8. This document provides:

- instructions and guidance on how to populate the PCFM Variable Values for submission for an Annual Iteration ProcessAIP;
- guidance on the process and timeframe for reporting and submitting the required data;
- any requirements that apply to supporting information, documentation or commentary to be submitted.

⁴ For the first submission of RIIO-2, this date has been moved to 31 August 2021.

2. The Price Control Financial Model

Background

- 2.1. We set ex-ante allowed revenues for each licensee at the outset of the RIIO-2 price control based on the information available at the time.
- 2.2. Throughout the price control, we use the AIP to update the variable values in the PCFM by updating inputs for actual expenditure and performance as well as updating forecasts for the latest view.
- 2.3. The revenue calculation macro in the model is then re-run to capture this new information and to calculate an adjustment to allowed revenue (AR_t) using the latest information.
- 2.4. This model and the re-calculated value of AR_t as well as the adjustment to revenue known as $ADJR_t$ is published on Ofgem's website by 30 November each year and is the value that licensees must use to set their charges for the forthcoming Regulatory Year under Special Condition 2.1 (*Revenue restriction*).

Model structure

2.5. The table below sets out the structure and contents of the sheets in the PCFM:

Sheet	Contents	
Cover	Content directory and Model key	
UserInterface	This sheet contains company and year selector switch	
	allowing the user to switch between companies and	
	Regulatory Years.	
	It also includes the "RunForOne" and "RunForAll" macro	
	buttons, enabling the user to perform the model's	
	recalculation function for either just the selected licensee or	
	all licensees.	

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Input	The Input tab is the starting point for all calculations in the
	PCFM and contains all the inputs necessary to calculate all
	the components of ARt.
	The Input tab pulls from the eight identically structured
	company-specific input tabs at the end of the model, using
	a choose function, depending on which company is selected.
Calculation sheets:	The calculation sheets are purple sheets and will be auto-
Totex	populated by the model when the inputs are updated for
TIM	each AIP. The calculations within the majority of these
Depn	sheets follow the algebra set out in the special licence
Return&RAV	conditions for the TO.
TaxPools	
Finance&Tax	
NonCore	
ReturnAdj	
Revenue	
AR	
Results sheets	The "LiveResults" sheet shows a live summary of the
	changes to the components of ARt, following any input
	updates. The values in this sheet update automatically
	following any changes to inputs to the year or company
	selector switch. This sheet shows results for the selected
	company.
	The "SavedResults" sheet hard-codes the values in the
	"LiveResults" sheet for comparison and record-keeping
	purposes, after the RunForOne or RunForAll macro has been
	run in the "UserInterface" sheet. This sheet shows the
	summary of results for all companies.
Monthly Inflation input sheet	The "Monthly Inflation" sheet shows the values for monthly
Annual Inflation input sheet	outturn and forecast price indices relating to the Retail Price
·	Index (RPI), Consumer Price Inflation including owner-
	occupiers' housing costs (CPIH) and Price index (PI), as
	defined in chapter 2 of PCFH.
	The "Annual Inflation" sheet shows the derivation of annual
	indices and inflation rates by aggregating the data in the
	"Monthly Inflation" sheet.
	,

	The inflation rates in the "Annual Inflation" sheet are used	
	to derive "real to nominal" conversion factors used	
	throughout the PCFM in relation to 2018/19 price base.	
SHET	The blue and grey shaded inputs, also known as the PCFM	
SPTL	Variable Values, in each company-specific input sheet are	
NGET	the inputs which should be updated as part of an AIP. These	
	are the values that this guidance document pertains to,	
	unless otherwise specified.	

Supporting models

2.6. As well as the PCFM itself, licensees must submit a number of other templates and files, the values from which will feed into the PCFM Variable Values table. These include but are not limited to:

- Cost and Volumes Regulatory ET2 Reporting Pack RRP⁴
- ET2 Revenue workbook⁵
- Tax workbook⁶
- Legacy ET1 PCFM and supporting files
- ET1 Revenue RRP (for LAR values)

Reporting timescales

2.7. The licensee must submit the PCFM, the required supporting models and commentary to the Authority by 31 August $\frac{2021}{100}$ and by $\frac{2021}{100}$ prior to each Regulatory Year $\frac{1}{100}$, thereafter $\frac{1}{100}$.

⁴ Applicable to future Regulatory Years only (From regulatory period starting 2021/22).

⁵ The ET2 Revenue workbook is to be submitted for the submission due on 31 August 2021, only. In future periods, the calculations in this workbook will be moved into the Cost and Volume RRP.

⁶ Applicable to future Regulatory Years only (regulatory period starting 2021/22).

⁵ This term is defined in Part B of Special Condition 1.1 (Interpretations and Definitions).

⁷ See the PCFM functional cut-off dates set out in Table 2.1 of the ET2 PCFH.

- 2.8. Ofgem will maintain up-to-date copies of and make any required modifications to the PCFM and its supporting models, the PCFH and the PCFM Guidance on an annual basis in accordance with the relevant governance processes set out in Special Conditions 8.1 and 8.2.
- 2.9. To allow licensees sufficient time to populate a PCFM for submission, modifications will be reflected in the version of the PCFM to be used for an upcoming AIP by 1 June 2021 and 1 May_prior to each Regulatory Year8, thereafter.5.
- 2.10. There will be one or more dry runs of the PCFM between the licensee's initial submission of the PCFM and the final run in early November. The number of dry runs needed will depend on the number and timing of variable value updates required for the licensee in any particular Regulatory Year.
- 2.11. The AIP will be completed by 30 November prior to each Regulatory Year t, or as soon as is reasonably practicable thereafter. The deadline of 30 November reflects the need for the licensee to have confirmation of its Allowed RevenueARt⁹ in time to calculate and set its use of system charges.
- 2.12. The steps of the AIP are specified in Special Condition 8.2, Part A and the process is further described in the ET2 PCFH.

Submissions

2.13. By 31 August $\frac{2021 \text{ and by } 31 \text{ July}}{7}$ prior to each Regulatory Year t thereafter the licensee must submit to the Authority the ET2 PCFM, with a completed variable values table (covering activity in the prior Regulatory Year and changes to forecast activity the has been run to calculate AR_t. $\frac{12}{12}$

See the PCFM functional cut-off dates set out in Table 2.1 of the GD2 PCFH.

⁹ This term is defined in Part B of Special Condition 1.1 (Interpretations and Definitions)

¹⁰ See the PCFM functional cut off dates set out in Table 2.1 of the ET2 PCFH.

 $^{^{11}}$ Variable values for Regulatory Years later than Regulatory Year t do not feed into the calculation of the term AR $_{\rm t}$. Therefore, calculated values in the PCFM for Regulatory Years later than Regulatory Year t represent only a forecast. This is without prejudice to the status of the variable values concerned, which may have been decided and/or directed under licence conditions and which may or may not be subject to subsequent revision.

¹² For the first year of submission the licensee must submit this to the Authority by 31st August.

2.14. As well as this, the <u>relevant</u> licensee must submit the relevant supporting models used to derive the variable values and any relevant commentary. For the first submission due on 31 August 2021, the variable values in the "PCFM inputs summary" sheet of the ET2 Revenue workbook RRP should be linked to the company-specific input sheets of the ET2 PCFM, where applicable.

2.15. All of the documents submitted as part of a dry run of the AIP must be sent to the Authority either through email or a secure file-sharing application such as Huddle.

Forecasting

- 2.16. The AIP allows for PCFM Variable Values to be updated during the course of the price control for outturn actual data as well as forecast data.
- 2.17. Where a PCFM Variable Value is not known at the time of submission, we expect the licensee to forecast a value using its best estimate under Special Condition 8.2.
- 2.18. It is acknowledged that forecasts will not be as accurate as actual reported data and that all forecasts will be made with a view to truing-up at a subsequent dry run or AIP, however we expect that the inclusion of forecasts will reduce the magnitude of any subsequent true-ups and reduce revenue volatility.

Price base

- 2.19. As described in chapter 2 of the ET2 PCFH, when ascertaining calculated revenue, the ET2 PCFM works in a constant 2018/19 price base except in respect of some calculations internal to the model that use nominal prices, eg, tax and legacy calculations.
- 2.20. The price base for each PCFM Variable Value is set out in the PCFM input sheets, for the avoidance of doubt.

Related documents

- ET2 Price Control Financial Handbook
- ET2 Price Control Financial Model
- ET2 Regulatory Instructions and Guidance (RIGs)
- ET2 Regulatory Reporting Pack

ET2 Regulatory Financial Performance Reporting
Other relevant Associated Documents as listed in **Table 3.1**

3. The ET2 Price Control Financial Model Variable Values

- 3.1. The variable values that can be revised during an AIP are set out in <u>Table 3.1 Table 3.1</u> below, and are also included as part of the PCFH.
- 3.2. For each variable value, the table provides a description, cross-references to the relevant Special Condition(s) (where appropriate), and details of Associated Documents (where relevant). It identifies a list of variable values in PCFM for which further guidance is provided either in this document or the Regulatory Instructions and Guidance (RIGs₂) as applicable.

Table 3.1 - RIIO-ET2 variable values (VV)

vv	Description	SpC	Cross reference / Associated Document
Variant Totex A	Allowances Price Control Deliverables		
EPIt	Visual Impact Mitigation Price Control Deliverable and Enhancing Pre-existing Infrastructure Projects allowance	SpC 3.10	PCFM Guidance, PCD Reporting Requirements and Methodology Document
LOTIAt	Large Onshore Transmission Investment Re-opener Project 1 - Hinckley Sea Bank	SpC 3.13	PCFM Guidance, LOTI Guidance and Submissions Requirement Document
WWt	Wider Works Price Control Deliverable	SpC 3.9	PCFM Guidance
PSUPt	Physical Security Price Control Deliverable	SpC 3.4	PCFM Guidance, PCD Reporting Requirements and Methodology Document
CROTt	Cyber resilience OT Price Control DeliverableBaseline	SpC 3.2	PCFM Guidance, PCD Reporting Requirements and Methodology Document
CRITt	Cyber resilience IT Price Control Deliverable <u>Baseline</u>	SpC 3.3	PCFM Guidance, PCD Reporting Requirements and Methodology Document
NARMt	Baseline Network Risk Output	SpC 3.1	PCFM Guidance, Network Asset Risk Workbook, NARM Handbook
GRIt	Generation Related Infrastructure Price Control Deliverable (NGET only)	SpC 3.20	PCFM Guidance, PCD Reporting Requirements and Methodology Document

vv	Description	SpC	Cross reference / Associated Document
ROt	Resilience and Operability Price Control Deliverable (SHET and SPTL only)	SpC 3.18	PCFM Guidance, PCD Reporting Requirements and Methodology Document
OTCt	Operational Transport Carbon Reduction Price Control Deliverable (NGET only)	SpC 3.21	PCFM Guidance
SSt	Shared Schemes Price Control Deliverable (SHET and SPTL only)	SpC 3.17	PCFM Guidance, PCD Reporting Requirements and Methodology Document
EERt	Enhanced Environmental Requirements use it or lose it allowance (SPTL only)	SpC 3.19	PCFM Guidance
SF6 _t	SF6 asset intervention Price Control Deliverable (NGET only)	SpC 3.27	PCFM Guidance
SASt	Substation Auxiliary Systems use it or lose it allowance (NGET only)	SpC 3.26	PCFM Guidance
InTt	Instrument Transformer Price Control Deliverable (NGET only)	SpC 3.22	PCFM Guidance
BAt	Bay Assets Price Control Deliverable (NGET only)	SpC 3.23	PCFM Guidance
PCt	Protection and Control Price Control Deliverable (NGET only)	SpC 3.24	PCFM Guidance
OCt	Overhead Line Conductor Price Control Deliverable (NGET only)	SpC 3.25	PCFM Guidance
PCFt	Pre-Construction Funding Price Control Deliverable	SpC 3.15	PCFM Guidance, PCD Reporting Requirements and Methodology Document
RDFt	Net Zero And Re-opener Development Fund use it or lose it allowance	SpC 3.5	PCFM Guidance

vv	Description	SpC	Cross reference / Associated Document
	Variant Totex Allowances (JMs	
VIMREt	Visual Impact Mitigation Re-opener and Enhancing Pre-existing Infrastructure Projects allowance	SpC 3.10	PCFM Guidance, Re-opener Guidance and Application Requirements
LOTIREt	Large Onshore Transmission Investment Re-opener Project 2 - Shetland	SpC 3.13	PCFM Guidance, LOTI Guidance and Submissions Requirement Document
GCEt	Generation Connections volume driver	SpC 3.11	PCFM Guidance
DRIt	Demand Connections volume driver (SPTL and NGET only)	SpC 3.12	PCFM Guidance
NZt	Net zero Re-opener	SpC 3.6	PCFM Guidance, Re-opener Guidance and Application Requirements
CAMt	Coordinated adjustment mechanism Reopener	SpC 3.8	PCFM Guidance, Re-opener Guidance and Application Requirements
MSIPREt	Medium Sized Investment Projects Reopener	SpC 3.14	PCFM Guidance, Re-opener Guidance and Application Requirements
SF6RE _t	SF6 asset intervention Re-opener (NGET only)	SpC 3.27	PCFM Guidance
SCRt	Sub-sea Cable Re-opener (SHET only)	SpC 3.28	PCFM Guidance, Re-opener Guidance and Application Requirements
UNLREt	Uncertain non-load related projects Reopener (SPTL only)	SpC 3.29	PCFM Guidance, Re-opener Guidance and Application Requirements
NOIT <u>RE</u> t	Non-operational IT Capex Reopener	SpC 3.7	PCFM Guidance, Re-opener Guidance and Application Requirements

VV	Description	SpC	Cross reference / Associated Document
TCRt	Tyne Crossing Project Re-opener (NGET only)	SpC 3.34	PCFM Guidance, Re-opener Guidance and Application Requirements
BRGt	Bengeworth Road GSP Project <u>Price</u> <u>Control DeliverableRe-opener</u> (NGET only)	SpC 3.35	PCFM Guidance, Price Control Deliverable assessment principles and reporting requirements)Re- opener Guidance and Application Requirements
CWRt	Civil Related Works Re-opener (NGET only)	SpC 3.32	PCFM Guidance, Re-opener Guidance and Application Requirements
TSFt	Tower Steelworks and Foundations Reopener (NGET only)	SpC 3.33	PCFM Guidance, Re-opener Guidance and Application Requirements
WWVt	Wider Works Volume Driver (NGET only)	SpC 3.30	PCFM Guidance
FWRt	Fibre Wrap Replacement Re-opener (NGET only)	SpC 3.31	PCFM Guidance, Re-opener Guidance and Application Requirements
ARRt	Access Reform Change Re-Opener	SpC 3.16	PCFM Guidance, Re-opener Guidance and Application Requirements
T10At	RIIO-ET1/RIIO-ET2_T1/T2_offset adjustment (NGET only)	Spc 3.38	PCFM Guidance
PCFRE _t	Pre-Construction Funding Re-Opener	SpC 3.15	PCFM Guidance, Re-opener Guidance and Application Requirements
PSUPREt	Physical Security Re-Opener	SpC 3.4	PCFM Guidance, Re-opener Guidance and Application Requirements

vv	Description	SpC	Cross reference / Associated Document		
CROTREt	Cyber resilience OT Re-Openernon-baseline	SpC 3.2	PCFM Guidance, Re-opener Guidance and Application Requirements		
CRITREt	Cyber resilience IT Re Openernon- baseline	SpC 3.3	PCFM Guidance, Re-opener Guidance and Application Requirements		
OEt	Opex escalator	SpC 3.36	PCFM Guidance		
EECAt	Entry and Exit Connection Asset Allowance	SpC 3.37	PCFM Guidance		
LGCEt	Legacy Baseline Connections Volume Driver (SHET only)	SpC 3.39	PCFM Guidance		
Actual Totex					
	Capitalisation rate 1:		ı		
ALC	Actual load related capex expenditure		PCFM Guidance		
ARC	Actual asset replacement capex expenditure		PCFM Guidance		
AOC	Actual other capex expenditure		PCFM Guidance		
ACO	Actual network operating costs (opex)		PCFM Guidance		
AIO	Actual Indirects (opex)		PCFM Guidance		
ANC	Actual non-operational capex		PCFM Guidance		
	Capitalisation rate 2:				
ALCU	Actual load related capex expenditure		PCFM Guidance		
ARCU	Actual asset replacement capex expenditure		PCFM Guidance		
AOCU	Actual other capex expenditure		PCFM Guidance		
ACOU	Actual network operating costs (opex)		PCFM Guidance		
AIOU	Actual Indirects (opex)		PCFM Guidance		
ANCU	Actual non-operational capex		PCFM Guidance		
Pass through e	Pass through expenditure				
RBt	Prescribed Rates	SpC 6.1, Part B	PCFM Guidance		
EDEt	Pension Scheme Established Deficit Repair	SpC 6.1, Part A	PCFM Guidance		
TPDt	Temporary physical disconnection costs	SpC 6.1, Part A	PCFM Guidance		

VV	Description	SpC	Cross reference / Associated Document	
SHCPt	Energy Note Supplied Compensatory scheme (SHET only)	SpC 6.2	PCFM Guidance	
Incentive Reve				
ENSIt	Energy Not Supplied ODI	SpC 4.2	PCFM Guidance	
IIGIt	Insulation and Interruption Gas emissions ODI	SpC 4.3	PCFM Guidance	
CONADJt	Timely connections ODI	SpC 4.4	PCFM Guidance	
QCSt	Quality of connections satisfaction survey ODI	SpC 4.5	PCFM Guidance	
SOTO _t	SO TO Optimisation ODI	SpC 4.7	PCFM Guidance, SO-TO Optimisation Governance	
ESIt	Environmental Scorecard ODI	SpC 4.6	PCFM Guidance	
Other Revenue	Allowances			
NIAt	RIIO-2 network innovation allowance	SpC 5.2	PCFM Guidance, RIIO-2 NIA Governance Document	
CNIAt	Carry-over Network Innovation Allowance	SpC 5.3	PCFM Guidance, RIIO-1 NIA Governance Document	
NZFt	Net Zero Fund use it or lose it allowance (SHET and SPTL only)	SpC 5.5	PCFM Guidance	
NZ3Ct	Net zero carbon Capital Construction use it or lose it allowance (NGET only)	SpC 5.6	PCFM Guidance	
NTMPt	Non-Technical Mitigation Projects allowance	SpC 5.4	PCFM Guidance	
LTIRGt	Transmission investment for renewable generation (SHET and SPTL only)	SpC 5.6 (SHET) SpC 5.7(SPT)	PCFM Guidance	
PRPNt	Pre-RIIO-1 pension true-up	SpC 5.1	PCFM Guidance	
Legacy Adjustments				
LPTt	Close-out of RIIO-ET1 pass-through items	SpC 7.2	PCFH section 8, PCFM Guidance	
LMODt	Legacy MOD	SpC 7.3	PCFH section 8, PCFM Guidance	

VV	Description	SpC	Cross reference / Associated Document
LKt	Legacy K correction	SpC 7.4	PCFH section 8, PCFM Guidance
LTRUt	Legacy TRU term	SpC 7.5	PCFH section 8, PCFM Guidance
NOCOt	Close-out of RIIO-ET1 network outputs	SpC 7.10	PCFH section 8, PCFM Guidance
LSSO _t	Close-out of RIIO-ET1 stakeholder satisfaction output	SpC 7.6	PCFH section 8, PCFM Guidance, Stakeholder Engagement Reward Guidance
LEDR _t	Close-out of RIIO-ET1 environmental discretionary reward scheme adjustment	SpC 7.7	PCFH section 8, PCFM Guidance, Environmental Discretionary Reward Scheme
LSFIt	Close-out of RIIO-ET1 sulphur hexaflouride gas emissions incentive	SpC 7.8	PCFH section 8, PCFM Guidance
LRIt	Close-out of RIIO-ET1 energy not supplied reliability incentive	SpC 7.9	PCFH section 8, PCFM Guidance
LRAVt	RIIO-1 net RAV additions (after disposals)	SpC 7.12	PCFH section 8, PCFM Guidance
Directly Remun	erated Services		
PREDRSt	Pre-vesting directly remunerated services	SpC 9.7	PCFM Guidance
POSDRSt	Post-vesting directly remunerated services	SpC 9.7	PCFM Guidance
OIDRSt	Other income from directly remunerated services	SpC 9.7	PCFM Guidance
IDRSt	Identified directly remunerated services costs	SpC 9.7	PCFM Guidance
Finance Inputs			
iBTA _t	iBoxx trailing average		PCFH section 4, PCFM Guidance
iBAFY _t	iBoxx average (Financial Year)		PCFH section 4, PCFM Guidance
iBAAO _t	iBoxx average (April - October)		PCFH section 4, PCFM Guidance
RFR	Risk-free rate		PCFH section 4, PCFM Guidance
Ij	Sterling Overnight Index Average (SONIA)	SpC 1.1, Part B	PCFH section 2, PCFM Guidance
RPEt	RPE annual growth		PCFM Guidance

vv	Description	SpC	Cross reference / Associated Document
ANDt	Adjusted net debt		PCFM Guidance
TDNIt	Tax deductible net interest cost		PCFM Guidance
TAXAt	Tax allowance adjustment	SpC 2.2	PCFH section 6, PCFM Guidance
TTEt	Tax liability allowance adjustments - driven by tax trigger events		PCFH section 6, PCFM Guidance
<u>OGPAt</u>	General pool opening balance adjustment	_	PCFM Guidance
OSRPAt	Special Rate pool opening balance adjustment	-	PCFM Guidance
OGPt	General pool capital allowance opening balance brought forward		PCFM Guidance
OSRPt	Special Rate capital allowance opening balance brought forward		PCFM Guidance
OSBPt	Structures and buildings capital allowance opening balance brought forward		PCFM Guidance
ODRPt	Deferred revenue expenditure opening balance brought forward		PCFM Guidance
LODRPt	Deferred revenue pool additions (RIIO1) plus opening balance at start of RIIO1		PCFM Guidance
OTLt	Tax loss brought forward		PCFM Guidance
ARGPt	Totex allocation to "General" tax pool		PCFM Guidance
ARSRt	Allocation to "Special Rate" tax pool		PCFM Guidance
ARSBt	Allocation to "Structures and Buildings" tax pool		PCFM Guidance
ARDRt	Allocation to "Deferred Revenue" tax pool		PCFM Guidance
ARRet	Allocation to "Revenue" tax pool		PCFM Guidance
ARNQt	Allocation to "Non-Qualifying" tax pool		PCFM Guidance
CTt	Corporation tax rate		PCFM Guidance
GCAt	General pool capital allowance rate		PCFM Guidance
SRCAt	Special Rates capital allowance rate		PCFM Guidance
SBCAt	Structures and buildings capital allowance rate		PCFM Guidance
DRCAt	Deferred Revenue Expenditure capital allowance rate		PCFM Guidance
RIIO-1AR _t	RIIO-1 allowed revenue	SpC 2.1	PCFM Guidance

vv	Description	SpC	Cross reference / Associated Document
RRt	Recovered revenue	SpC 2.1, Part B	PCFM Guidance

4. Instructions for completing the PCFM Variable Value table

- 4.1. The below table contains instructions for licensees on how to populate the PCFM Variable Values table for submission to the Authority at each dry run of an AIP.
- 4.2. Unless otherwise specified, all row and cell-references relate to the NGET licenseeRevenue input sheet of the ET2 PCFMRRP.
- 4.3. Where the guidance refers to cost or other data that links to the ET2 Revenue workbook from the Cost and Volumes Regulatory Reporting Pack (C&V RRP), these values should be directly input into the ET2 Revenue workbook for the PCFM submission due on August 31st 2021.
- 4.4. The first submission of the RIIO 2 Cost and Volumes RRP will be in July 2022 and so for the first PCFM submission in August 2021, the Cost and Volume file will not be available. In the absence of this file, the licensees should enter its best estimate of forecast costs and output data into the yellow input cells of the ET2 Revenue workbook to calculate the PCFM Variable Values that will be included in the November 2021 AIP.
- 4.5.4.3. The contents of the ET2 Revenue workbook will be included within the Cost and Volumes RRP in all future Regulatory Years along with the required guidance for the underlying inputs, which will be included in the RIGs.

Variable value category	Guidance for Completion
Variant Totex Allowances - Price	In general, the value of the Price Control
Control Deliverables (PCDs)	Deliverable is an ex-ante allowance, subtracting
Visual Impact Mitigation Price	any reductions that have been directed by the
Control Deliverable and	Authority.
Enhancing Pre-existing	
Infrastructure Projects	The ex-ante allowances are given in the appendix
allowance	for the relevant Special Condition, and the
Large Onshore Transmission	reductions are provided by directions from the
Investment Re-opener Project 1	Authority.
- Hinckley Sea Bank	
Wider Works Price Control	For the <u>se</u> Variable Values in rows 20:39, the
Deliverable	actual adjustments directed by Ofgem should be

- Physical Security Price Control Deliverable
- Cyber Resilience OT Price
 Control DeliverableBaseline
- Cyber Resilience IT Price Control DeliverableBaseline
- Baseline Network Risk Output
- Generation Related
 Infrastructure Price Control
 Deliverable (NGET only)
- Resilience and Operability Price Control Deliverable (SHET and SPTL only)
- Operational transport carbon reduction Price Control Deliverable (NGET only)
- Shared Schemes Price Control Deliverable (SHET and SPTL only)
- Enhanced Environmental Requirements use it or lose it allowance (SPTL only)
- SF6 asset intervention Price Control Deliverable (NGET only)
- Substation Auxiliary Systems use it or lose it allowance (NGET only)
- Instrument Transformer Price
 Control Deliverable (NGET only)
- Bay Assets Price Control Deliverable (NGET only)
- Protection and Control Price
 Control Deliverable (NGET only)
- Overhead Line Conductor Price Control Deliverable (NGET only)
- Pre-Construction Funding Price Control Deliverable

input into the yellow adjustment cells in the "PCDs" and "PCDs – Supporting Calculations" sheets of the ET2 RRP. This data will then be picked up in the allowance values on PCFM Input Summary sheets, which should be used to populate the licensee input sheets in -the PCFM.

Forecasting

Where Ofgem has yet to issue any directions, but a licensee expects not to deliver an output identified in the relevant Special Condition appendices, they it should use best endeavours to forecast the expected adjustment into the yellow adjustment cells in the "PCDs" and "PCDs – Supporting Calculations" sheets.

Details of the assumptions made should be provided in the supplementary commentary.

Net Zero And Re-opener
 Development Fund use it or lose
 it allowance

<u>Variant Totex Allowances - Volume</u> <u>Drivers</u>

- Generation Connections volume driver
- Demand Connections volume driver (SPTL and NGET only)
- Wider Works Volume Driver (NGET only)
- Legacy Baseline Connections
 Volume Driver (SHET only)

For <u>actual periods</u> the Variable Values in rows
53,54,66 and 76, the actuals <u>data</u> should be
input into the yellow cells in the "Volume Drivers"
sheet <u>of the ET2 RRP</u>. This data will then be
picked up in the allowance values on PCFM Input
Summary sheets, which should be used to
populate <u>licensee input sheets in the the PCFM</u>.

With respect to the *Wider Works Volume Driver*, the licensee must supply the data sheets used to calculate the inputs alongside relevant supporting commentary.

With respect to the <u>Legacy Baseline Connections</u>

<u>Volume Driver</u> (SHET only), the licensee should
input the allowance value directly into the yellow
cells in the PCFM Input Summary sheet.

Forecasting

For forecast periods relating to future Regulatory
Years Forecasts for future regulatory periods data
should be input directly into the yellow input cells
of the above referenced "Volume Drivers" sheet
of the ET2 RRP. This data will then be picked up
in the allowance values on PCFM Input Summary
sheets, which should be used to populate licensee
input sheets in the PCFM.

Variant Totex Allowances - Reopeners

A re-opener is a type of uncertainty mechanism, which allows the Authority to adjust a licensee's

- Visual Impact Mitigation Reopener
- Large Onshore Transmission
 Investment Re-opener Project 2
 - Shetland
- Net zero Re-opener
- Coordinated adjustment mechanism Re-opener
- Medium Sized Investment
 Projects Re-opener
- SF6 asset intervention Reopener (NGET only)
- Subsea Cable Re-opener (SHET only)
- Uncertain non-load related projects Re-opener (SPTL only)
- Non-operational IT Capex
 Reopener
- Tyne Crossing Project Re-opener (NGET only)
- Bengeworth Road GSP Project
 Re-openerPrice Control
 Deliverable (NGET only)
- Civil Related Works Re-opener (NGET only)
- Tower Steelworks and Foundations Re-opener (NGET only)
- Fibre Wrap Replacement Reopener (NGET only)
- Access Reform Change Re-Opener
- Pre-Construction Funding Re-Opener
- Physical Security Re-Opener
- Cyber Resilience OT Re-Openernon-baseline

allowances (either up or down) based on an application by the licensee, in response to changing circumstances during the price control period.

The ex-ante allowances are given in the appendix for the relevant Special Condition, and the adjustments are provided by directions from the Authority.

Within the application window

For these Variable Values in rows 43:73, where actual amounts are known at the time of the dry run, ie, where a decision has already been made on a reopener application, the licensee must use the adjustment values as published by the Authority to update the relevant re-opener allowance and adjustment yellows input cells in the "Re-openers" sheet of the ET2 RRP. This data will then be picked up in the allowance values on the PCFM Input Summary sheets, which should be used to populate licensee input sheets in the PCFM. the PCFM.

Where an application has been submitted but no decision has been made, the licensee must use the adjustment values as published in any minded-to position by the Authority. Where no minded-to position has been published, the licensee may use the same values included in its application or the actual costs incurred in the Regulatory Year, whichever is lower.

This is with a view to updating these values at a later dry run (or AIP) to correspond to a subsequent Ofgem decision.

 Cyber Resilience IT Re-Openernon-baseline

Outside of the application window

The licensee may choose to update its re-opener allowance variable values using forecast data ahead of any relevant re-opener window. This should be done by updating the yellow adjustment and allowance cells in the "Re-openers" sheet of the ET2 RRP.

The values to use are the actual costs incurred or forecast costs expected to be incurred in each Regulatory Year and applied for through the relevant re-opener and should be based on the information that the licensee has provided in the "Re-opener pipeline log", which will be included in the ET2 Cost and Volumes RRP.

Any supporting justification should be provided in addition to the log as per the re-opener guidance specified in the ET-RIGs.^{±3}

Variant Totex Allowances:

 Entry and Exit Connection Asset Allowance The value in row 75-128 relates to the Entry and Exit Connection Asset Allowance.

Within the 'Re-openers' sheet in the ET2

RRPRevenue workbook_ the value to be input for EECCt (Capital contribution from Users relating to Transmission Connection Assets) should be negative in the case of the licensee receiving a capital contribution, and positive in the case of the licensee paying a reimbursement.

¹³ This requirement does not apply for the 31 August 2021 submission; however, beginning next year, licensees are expected to provide any supporting information along with the pipeline log submitted within the Cost & Volumes RRP.

Variant Totex Allowances:	The values in row 69-58 are a pre-determined
• RIIO-ET1/RIIO-ET2 T1/T2	fixed allowance of -£15.768m per year as set out
Offset Adjustment (NGET only)	in SpC 3.38 (<u>RIIO-ET1/RIIO-ET2</u> T 1/T2 Offset
	Adjustment).
Opex Escalator	The opex escalator provides an additional
	allowance for any capital expenditure incurred on
	the eligible re-openers and volume drivers listed
	in SpC 3.36 (Opex escalator).
	For the variable value in row 74, actual and
	forecast data should be input into the yellow
	input cells in the "Opex Escalator – Supporting"
	sheet of the ET2 Revenue workbook.
	The values to input should be the direct capex
	element of Aany actual or forecast expenditure
	for each of the eligible re-openers and volume
	drivers within the UMTERMA _{i,t} term <u>are</u> , as
	reported in the "Re-opener pipeline log", which
	will be is included within the ET2 Cost and
	Volumes RRP.
	These values for re-openers and volume drivers
	within the UMTERMA _{i,t} term (load related), require
	an energisation date to be input, on a per project
	basis. Where an energisation date is not known,
	no values are required to be inputted.
	The values for re-openers and volume drivers
	within $UMTERMB_t$ are linked to the relevant
	allowance within the 'Re-openers' and 'Volume
	Drivers' tabsheet in the ET2 RRP.
	This data is collected in the "Opex Escalator"
	sheet <u>of the ET2 RRP</u> , and is subsequently picked
	up as an allowance on the PCFM Input Summary

disconnection costs

sheet, which should be used to populate licensee input sheets in the PCFM.populate the PCFM. **Actual Totex** Totex is reported in one of two buckets, Capitalisation rate 1: capitalisation rate 1 and capitalisation rate 2. Actual load related capex Any expenditure relating to ex-ante, or baseline expenditure funded activities including PCDs is subject to Actual asset replacement capex expenditure capitalisation rate 1. Actual other capex expenditure Actual network operating costs Any expenditure relating to activities that have been funded under Uncertainty Mechanisms (as (opex) labelled in the PCFM) is subject to capitalisation Actual Indirects (opex) Actual non-operational capex rate 2. Capitalisation rate 2: For the totex values in rows 85:98, actual and Actual load related capex forecast data for the reporting period in question will be automatically linked from the "Rev expenditure Workbook Linking Sheet" sheet to the "PCFM" Actual asset replacement capex Input Summary" of the ET2 RRP. should be input expenditure Actual other capex expenditure directly into the PCFM Input Summary sheet, Actual network operating costs which These values should be used to populate (opex) the PCFM. Actual Indirects (opex) Actual non-operational capex **Forecasting** Forecasts for future regulatory periods should be input directly into the TO PCFM Input Summary sheets, which should be used to populate the PCFM. Pass-through costs Pass-through costs are specified costs that are Prescribed Rates predominantly outside of a licensee's control and Pension Scheme Established may be passed through to consumers. These Deficit repair costs are defined in SpC 6.1 (Pass-through Temporary physical items).

 Energy not supplied compensatory scheme (SHET only) For the pass-through variable values in rows 102:105, actual data for the reporting period in question should be put directly into the yellow input cells of the "Pass-Through" sheet of the ET2 RRP. This data is then picked up in the PCFM Input Summary sheet, which should be used to populate the licensee input sheets in the PCFM. The PCFM.

Where required, further detailed guidance for updating these variable values will beis provided in the ET-RIGs.

Forecasting

Forecasts for future regulatory periods should be taken directly input directly into the yellow input cells of the "Pass-Through" sheet of the ET2 RRP, which should be used to populate the licensee input sheets in the PCFM.

<u>Incentive revenue (Output Delivery Incentives)</u>

- Energy not supplied ODI
- Insulation And Interruption Gas emissions ODI
- Timely Connections ODI
- Quality of connections satisfaction survey ODI
- SO-TO Optimisation ODI
- Environmental scorecard ODI

Incentive revenue or output delivery incentives (ODI) are used to reward or penalise licensees for their performance.

For the ODI values in rows 111:116, actual data for the reporting period in question should be input directly into the yellow input cells of the "Output Delivery Incentives" sheet of the ET2 RRP. This data is then picked up in the "PCFM Input Summary" sheet, which should be used to populate the licensee input sheets in the PCFM.

Further detailed guidance for updating these underlying inputs to the calculations in the "Output Delivery Incentives" sheet will be provided in the ET2 RIGS.

Forecasting

Forecasts for future regulatory periods should be input directly into the yellow input cells of the "Output Delivery Incentives" sheet of the ET2
RRP. This data will then be picked up in the allowance values on the "PCFM Input Summary" sheet, -which should be used to populate the licensee input sheets in the PCFM

Other Revenue allowances

- RIIO-2 network innovation allowance
- Carry-over Network Innovation Allowance
- Net Zero Fund use it or lose it allowance (SHET and SPTL only)
- Net zero carbon Capital Construction use it or lose it allowance (NGET only)
- Non-Technical Mitigation
 Projects allowance
- Transmission investment for renewable generation (SHET and SPTL only)

For the ORA values in rows 120:128, actual data for the reporting period in question should be input directly into the yellow input cells of the "Other Revenue Allowances" sheet of the ET2 RRP. This data will then be picked up in the allowance values on the "PCFM Input Summary" sheet, which should be used to populate the licensee input sheets in the PCFM. This data is then picked up in the PCFM Input Summary sheets, which should be used to populate the PCFM.

With respect to *Total NIA Expenditure*, the licensee must input expenditure excluding any expenditure which is deemed to be 'Unrecoverable NIA Expenditure' as per the requirements of the RIIO-2 NIA Governance Document.

Further detailed guidance for updating the underlying inputs to the calculations in the "Other Revenue Allowances" sheet will beis provided in the ET2_ET_RIGS.

Forecasting

Forecasts for future regulatory periods should be input directly into the yellow input cells of the "Other Revenue Allowances" sheet of the ET2

RRP. This data will then be picked up in the allowance values on the "PCFM Input Summary" sheet, which should be used to populate the licensee input sheets in the PCFM.above referenced sheet. Legacy MOD Legacy values will be directed by Ofgem following the formal close-out of the RIIO-ET1 price control. In the interim period between the beginning of ET2 and the direction of these values and the establishment of a close-out methodology, the licensee must calculate its provisional Legacy MOD values in accordance with the processes set out in chapter 8 of the PCFH. The licensee must update its legacy ET1 PCFM for any outturn data relating to the 2020/21 Regulatory Year as taken from its 31 August 2021 RIGs submissions. The legacy ET1 PCFM must then be run to generate the legacy $MOD_{2022/23}$ value. This should then be inflated using the RPIF figure from the ET1 Revenue RRP and input in the 'LMOD' variable value input row in the licensee-specific input sheets in the ET2 PCFM for 2022/23. The Licensee may choose to incorporate other modifications as it considers necessary to the Legacy ET1 PCFM to reflect any anticipated closeout adjustments for which Ofgem has not yet provided a methodology in the Legacy MOD value for 2022/23. If the Licensee chooses to do this, it must also submit a description of the specific modifications

	made to the Legacy ET1 PCFM along with a
	justification for them in its PCFM Dry Run
	Commentary (see section 5 of this Guidance).
RIIO-1 net RAV additions (after disposals)	Legacy values will be directed by Ofgem following the formal close-out of the RIIO-ET1 price control.
	In the interim period between the beginning of ET2 and the direction of these values and the establishment of a close-out methodology, the licensee must calculate its provisional RIIO-1 net RAV additions (LRAV) values in accordance with the processes set out in chapter 8 of the PCFH.
	The licensee must update its legacy ET1 PCFM for any outturn data relating to the 2020/21 Regulatory Year as taken from its 31 August 2021 RIGs submissions. The legacy ET1 PCFM must then be run to generate the provisional closing RAV position and this should be input in the LRAV variable value input row in its licensee-specific input sheet in the ET2 PCFM, covering the historical ET1 period to 31 March 2021.
	The Licensee may choose to incorporate other modifications as it considers necessary to the Legacy ET1 PCFM to reflect any anticipated close-out adjustments for which Ofgem has not yet provided a methodology in its LRAV values.
	If the Licensee chooses to do this, it must also submit a description of the specific modifications made to the Legacy ET1 PCFM along with a justification for them in its PCFM Dry Run Commentary (see section 5 of this Guidance).

Other Legacy adjustments

- Close-out of RIIO-ET1 passthrough items
- Legacy K correction
- Legacy TRU term
- Close-out of RIIO-ET1 network outputs
- Close-out of RIIO-ET1 stakeholder satisfaction output
- Close-out of RIIO-ET1
 environmental discretionary
 reward scheme adjustment
- Close-out of RIIO-ET1 sulphur hexaflouride gas emissions incentive
- Close-out of RIIO-ET1 energy not supplied reliability incentive

Legacy values will be directed by Ofgem following the formal close-out of the RIIO-ET1 price control.

In the interim period between the beginning of ET2 and the direction of these values following the close-out of ET1, the licensee must use the legacy values for input in rows 133:141 of the PCFM_in accordance with the processes set out in the "Legacy Adjustment to Revenue section" of chapter 8 of the PCFH.

Directly remunerated services

- Pre-vesting directly remunerated services
- Post-vesting directly remunerated services
- Other Income directly remunerated services
- Identified directly remunerated services costs

For the DRS values in rows 146:149, actual and forecast data for the reporting period in question should be input directly into the yellow input cells in the "DRS RevenuePCFM Input Summary" sheet of the ET2 RRP.7 This data will then be picked up in the allowance values on the "PCFM Input Summary" sheet, which should be used to populate the licensee input sheets in the PCFM which should be used to populate the PCFM.

iBoxx trailing average (iBTA_t)
iBoxx average (Financial Year) (IBAFYt)
iBoxx average (April - October)
(IBAAOt)
Risk-free rate (RFR)

These finance inputs are calculated by the Authority using the WACC allowance model and feed into the licensee's allowed return on capital.

The<u>se input</u>-values in rows 153:156 are calculated and populated by Ofgem during the final dry run of each AIP, which usually takes place in early November.

	These values are sourced from the updated WACC allowance model. The methodology for the derivation of iBTA and RFR is described in chapter 4 of the PCFH.
Sterling Overnight Index Average (It)	This finance input is calculated by the Authority using the WACC allowance model and is used in calculation of the correction term (K_t) .
	The input value in row 157 is calculated and populated by Ofgem during the final dry run of each AIP, which usually takes place in early November.
	This value is sourced from the updated WACC allowance model.
Real Price Effects (RPEs) annual growth rate	This value (%) is calculated by the Authority and is sourced directly from the updated RPE model in accordance with the methodology and process set out in chapter 5 of PCFH. A redacted version of this workbook will be shared with the licensee and published by Ofgem following each AIP, alongside the PCFM and WACC Allowance Model.
Adjusted net debt	For this variable value, actual data for the reporting period in question should be input directly into the company specific input sheets of the PCFM. Licensees may also update forecast data for this variable value.
	The figures used to update this variable value should be those reported as "Net Debt as per the Regulatory (RIIO-21) definition" in the licensee's submitted RFPR.
	See the RIIO-12 RFPR Guidance for further detail on what this value comprises.

Tax deductible net interest cost	For this variable value, actual t data for the reporting period in question should be input directly into the company specific input sheets of the PCFM. Licensees may also update forecast data for this variable value.
	The figures used to update this variable value should be those reported as "Net Interest as per the Regulatory (RIIO-2+) definition" in the licensee's submitted RFPR.
	See the RIIO-21 RFPR Guidance for further detail on what this value comprises.
Tax liability allowance adjustments –	This value will not be applicable unless the
driven by tax trigger events	licensee has followed the notification process set out in chapter 6 of the PCFH. Ofgem will provide confirmation of the final figure to be used for this variable value.
Tax liability allowance adjustments	This value will not be applicable unless the Authority has directed a value following a tax review under Special Condition 2.2.
Capital allowance opening pools brought forward	Legacy values will be directed by Ofgem following the formal close-out of the RIIO-ET1 price control.
	In the interim period between the beginning of ET2 and the direction of these values following the close-out of ET1, the licensee must use the provisional closing balances taken from the legacy ET1 PCFM to populate the Capital allowance opening pools brought forward balances in its RIIO-2 PCFM.

	The closing balances should come from the same
	version of the legacy GD1 PCFM that the LRAV
	and LMOD values are taken from.
Tax loss brought forward ¹⁴	As above for "Capital allowance opening pools
	brought forward".
Tax pool allocation rates	For these values in rows 176:181, the rates used
	to allocate totex into the different tax pools can
	be updated using the calculations in the "Tax
	Pools Totex allocations" sheet of the ET2 Revenue
	workbook.RRP.
	Allocation percentages of totex categories to tax
	pools should be input by the licensee in the
	yellow input rows based on their best estimate of
	the allocation rates at the time of updating the
	inputs. These rates will then be used to derive
	capital allowance allocation rates used by the
	PCFM.
	Allocation rates should not be retrospectively
	updated for a year where the ADJR* value has
	already been published and charges have already
	been set.
Recovered Revenue	This variable value as defined in SpC 2.1, Part B
	of ET Licences should be provided by licensees
	and input directly into company specific input
	sheets of the ET2 PCFM. Recovered revenue is
	net of Bad Debt.
CPIH Outturn	This value is shown in the "Monthly inflation"
	sheet of the PCFM and will be updated by the
	Authority in line with the methodology for the
	Price Index calculation set out in chapter 2 of the
	PCFH.

 $^{^{14}}$ This variable value relates to a licensee's regulatory opening tax losses and not statutory tax losses per corporation tax returns.

	7
	Ofgem will update the CPIH outturn index during the final dry run of each AIP using data that is available as at 31 October.
RPI Outturn	This value is shown in the "Monthly inflation" sheet of the PCFM and will be updated by the Authority in line with the methodology for the Price Index calculation set out in chapter 2 of the PCFH.
	Ofgem will update the RPI outturn index during the final dry run of each AIP using data that is available as at 31 October.
RPI inflation forecast (Calendar year)	This value is shown in the "Annual inflation" sheet of the PCFM and will be updated by the Authority in line with the methodology for the Price Index calculation set out in chapter 2 of the PCFH.
	Ofgem will update the RPI inflation forecast during the final dry run of each AIP using Office for Budget Responsibility (OBR) data that is available as at 31 October.
Long term CPIH inflation forecast	This value is shown in the "Annual inflation" sheet of the PCFM and will be updated by the Authority in line with the methodology set out in chapter 4 of PCFH.
	Ofgem will update this inflation forecast during the final dry run of each AIP using OBR data that is available as at 31 October.
CPI inflation forecast (Calendar year)	This value is shown in the "Annual inflation" sheet of the PCFM and will be updated by the Authority in line with the methodology for the Price Index calculation set out in chapter 2 of the PCFH.

Ofgem will update the RPI inflation forecast
during the final dry run of each AIP using OBR
data that is available as at 31 October

5. PCFM Dry Run Commentary

Background

- 5.1. This The licensee's PCFM submission should be accompanied by supporting commentary as well as any applicable supporting models and underlying workings.
- 5.2. The main purpose of the PCFM dry run commentary is to provide a useful summary of the updates that have been made to the PCFM variable values and the impact that these have had on the licensee's Allowed RevenueARt for the Regulatory Year t, in narrative form.

Structure of the commentary

- 5.3. The outline structure of the commentary is as follows:
- Executive summary
- Updates to the PCFM Variable Values
- Impact on Allowed Revenue
- Statement on forecast data
- Corporate governance narrative
- Data assurance statement
- Other relevant information
- 5.4. The sections outlined above should contain sufficient detail such that the Authority is able to re-perform the updates made and arrive at the same value for ADJR and ARt.
- 5.5. The licensee should provide detail on the following areas at a minimum:
- a summary of the updates the licensee has made to the PCFM Variable Values in the input sheet(s) since the last published version of the PCFM that was made available by Ofgem;
- the source of the data used to update the PCFM Variable Values (ie, Ofgem directions, Cost and VolumesET2 RRP, Legacy PCFM or forecast data;
- a description of the impact of the changes on ADJR and Allowed RevenueARt and the key driver(s) of this impact;
- for any forecast data, the licensee should include a statement confirming that it has used its best estimate to ensure forecasts are reasonable in light of the information available at the time and that any significant changes to forecast values have suitable supporting statements;

- A statement on corporate governance including detail on the licensee's executive remuneration and its dividend policy, 15
- A data assurance statement briefly setting out the assurance processes that the
 information in the commentary, the PCFM inputs sheet and any underlying input files (eg,
 Cost and VolumeET2 RRP) are subject to; and,
- any other information the licensee considers is appropriate to explain the PCFM submission.

Submission

- 5.6. A dry run commentary is required from all Licensees. Where a Licensee is part of a company that has more than one licence within a sector they it may submit a single commentary to cover all licensees.
- 5.7. The dry run commentary should reconcile with and refer to the PCFM dry run submitted. Any narrative or tables in the commentary should be clearly disaggregated by licensee. A full dry run commentary is required for the first dry run submission and for any subsequent dry runs, a narrative will only be required for any variable values, which have been amended from the prior dry run.
- 5.8. Where appropriate, the licensee may cross-reference to other information that supports their-its submission. Any cross-referencing should clearly direct the Authority to the source data used eg, through hyperlinks.

¹⁵ This requirement does not apply for the 31 August 2021 submission; however, beginning next year, licensees are expected to provide this information for which Ofgem will consult and provide additional guidance.