

# Guidance

GD2 PCFM Guidance			
First publication	1 June 2021	Team:	Regulatory Finance
Effective date	1 June 2021	Tel:	020 7901 7000
Effective date	1 Julie 2021	rei:	020 7901 7000
Version	1. <u>1</u> 0	Email:	RegFinance@ofgem.gov.uk

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-GD2.

#### © Crown copyright 2021

The text of this document may be reproduced (excluding logos) under and in accordance with the terms of the **Open Government Licence**.

Without prejudice to the generality of the terms of the Open Government Licence the material that is reproduced must be acknowledged as Crown copyright and the document title of this document must be specified in that acknowledgement.

Any enquiries related to the text of this publication should be sent to Ofgem at: 10 South Colonnade, Canary Wharf, London, E14 4PU. Alternatively, please call Ofgem on 0207 901 7000.

This publication is available at <u>www.ofgem.gov.uk</u>. Any enquiries regarding the use and re-use of this information resource should be sent to: <u>psi@nationalarchives.gsi.gov.uk</u>

# **Contents**

5. Introduction	4
Background	4
Legal Framework	4
Purpose	5
6. The Price Control Financial Model	6
Introduction	6
Model structure	6
Supporting models	8
Reporting timescales	<u>9</u> 8
Submissions	<u>10</u> 9
Forecasting	10
Price base	<u>11</u> <del>10</del>
Related documents	<u>11</u> 10
7. The GD2 Price Control Financial Model Variable Values	<u>12<del>11</del></u>
4. Instructions for completing the PCFM Variable Values table	<u>21</u> <del>20</del>
8. PCFM Dry Run Commentary	<u>40</u> 36
Background	<u>40</u> 36
Structure of the commentary	<u>40</u> 36
Suhmission	41 <del>37</del>

#### 5. Introduction

## **Background**

1.1. The PCFM Guidance This document is part of the Regulatory Instructions and Guidance (RIGs) for RIIO-GD2. 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. This document provides network operators (licensees) with information on how to fill out the revenue sheets within the RIIO-GD2 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 licenseesthey 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 GD2 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 GD2 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 A40<sup>2</sup>: Regulatory Instructions and Guidance ('the RIGs Licence Condition') of the gas transporter licence conditions applicable to the Gas Distribution Networks.

<sup>1</sup>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.

<sup>&</sup>lt;sup>2</sup> Where a reference is made to the licence, this is to standard conditions, standard special conditions and special licence conditions of the gas transporter's licence applicable to the GDNs.

1.4. 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 GD2 Price Control Financial Instruments).

1.5.1.6. 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 GD2 Price Control Financial Model).

### **Purpose**

1.6.1.7. The purpose of this document is to provide guidance to enable <u>Gas Distribution</u>

Networks (GDNs) to complete each dry run of an AIP that is submitted to Ofgem. As described in <u>the GD2</u> Price Control Financial Handbook, the dry runs process entails amending and confirming values for each Regulatory Year over a number of months, from 31

July August to early November, on an iterative basis to account for updates to the <u>PCFM</u>

Variable Values as they become known.

#### <del>1.7.</del>1.8. This document provides:

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

<sup>&</sup>lt;sup>3</sup> For the first submission of RIIO-2, this date has been moved to 31-August 2021.

<sup>&</sup>lt;sup>4</sup> This term is defined in Part B of Special ConditionSpC 1.1 (Interpretations and Definitions). Part B

### 6. The Price Control Financial Model

### Introduction

- 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  $ADJR_t^5$  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

<sup>5</sup> This term is defined in SpC 2.1 Part D

all licensees.  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 AR <sub>1</sub> .  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 autopopulated by the model when the inputs are updated for each AIP. The calculations within the majority of these sheets follow the algebra set out in the special licence conditions for each GDN.  Return&RAV TaxPools Finance&Tax ReturnAdj Revenue AR Results sheets  The "LiveResults" sheet shows a live summary of the changes to the components of AR <sub>1</sub> , 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 Annual Inflation input sheet The "Monthly Inflation" sheet shows the values for monthly 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.		recalculation function for either just the selected licensee or
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.  Totex  The calculation sheets:  The calculation sheets are purple sheets and will be autopopulated by the model when the inputs are updated for each AIP. The calculations within the majority of these sheets follow the algebra set out in the special licence conditions for each GDN.  Return&RAV TaxPools Finance&Tax ReturnAdj Revenue  AR  Results sheets  The "LiveResults" sheet shows a live summary of the changes to the components of AR, 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 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  Annual Inflation input sheet		all licensees.
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 autopopulated by the model when the inputs are updated for each AIP. The calculations within the majority of these sheets follow the algebra set out in the special licence conditions for each GDN.  Return&RAV TaxPools Finance&Tax 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 Annual Inflation input sheet	Input	The Input tab is the starting point for all calculations in the
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 autopopulated by the model when the inputs are updated for each AIP. The calculations within the majority of these sheets follow the algebra set out in the special licence conditions for each GDN.  Return&RAV TaxPools Finance&Tax ReturnAdj Revenue AR  Results sheets  The "LiveResults" sheet shows a live summary of the changes to the components of AR <sub>s</sub> , 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 Annual Inflation input sheet		PCFM and contains all the inputs necessary to calculate all
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 autopopulated by the model when the inputs are updated for each AIP. The calculations within the majority of these sheets follow the algebra set out in the special licence conditions for each GDN.  Return&RAV TaxPools Finance&Tax 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 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 Annual Inflation input sheet Annual Inflation input sheet Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as		the components of AR <sub>t</sub> .
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 autopopulated by the model when the inputs are updated for each AIP. The calculations within the majority of these sheets follow the algebra set out in the special licence conditions for each GDN.  Return&RAV TaxPools Finance&Tax 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 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 Annual Inflation input sheet Annual Inflation input sheet Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as		
a choose function, depending on which company is selected.  Calculation sheets:  The calculation sheets are purple sheets and will be autopopulated by the model when the inputs are updated for each AIP. The calculations within the majority of these sheets follow the algebra set out in the special licence conditions for each GDN.  Return&RAV  TaxPools  Finance&Tax  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  Annual Inflation input sheet		The Input tab pulls from the eight identically structured
Calculation sheets:  The calculation sheets are purple sheets and will be auto- populated by the model when the inputs are updated for each AIP. The calculations within the majority of these sheets follow the algebra set out in the special licence fuelPoor Return&RAV TaxPools Finance&Tax 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 Annual Inflation input sheet Index (RPI), Consumer Price Inflation including owner- occupiers' housing costs (CPIH) and Price index (PI), as		company-specific input tabs at the end of the model, using
Totex  populated by the model when the inputs are updated for each AIP. The calculations within the majority of these sheets follow the algebra set out in the special licence conditions for each GDN.  Return&RAV TaxPools Finance&Tax 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 Annual Inflation input sheet Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as		a choose function, depending on which company is selected.
TIM each AIP. The calculations within the majority of these sheets follow the algebra set out in the special licence conditions for each GDN.  Return&RAV TaxPools Finance&Tax 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 Annual Inflation input sheet Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as	Calculation sheets:	The calculation sheets are purple sheets and will be auto-
Depn sheets follow the algebra set out in the special licence conditions for each GDN.  Return&RAV TaxPools Finance&Tax 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 Annual Inflation input sheet Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as	Totex	populated by the model when the inputs are updated for
FuelPoor Return&RAV TaxPools Finance&Tax 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 Annual Inflation input sheet Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as	TIM	each AIP. The calculations within the majority of these
Return&RAV TaxPools Finance&Tax 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 Annual Inflation input sheet Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as	Depn	sheets follow the algebra set out in the special licence
TaxPools Finance&Tax 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 Annual Inflation input sheet  The "Monthly Inflation" sheet shows the values for monthly 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	FuelPoor	conditions for each GDN.
Finance&Tax  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  Annual Inflation input sheet  The "Monthly Inflation" sheet shows the values for monthly 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	Return&RAV	
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  Annual Inflation input sheet  Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as	TaxPools	
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  Annual Inflation input sheet  Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as	Finance&Tax	
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  Annual Inflation input sheet  The "Monthly Inflation" sheet shows the values for monthly 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	ReturnAdj	
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  Annual Inflation input sheet  Annual Inflation input sheet  Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as	Revenue	
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  Annual Inflation input sheet  The "Monthly Inflation" sheet shows the values for monthly 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	AR	
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  Annual Inflation input sheet  Annual Inflation input sheet  Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as	Results sheets	The "LiveResults" sheet shows a live summary of the
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  Annual Inflation input sheet  The "Monthly Inflation" sheet shows the values for monthly 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		changes to the components of ARt, following any input
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  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		updates. The values in this sheet update automatically
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  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		following any changes to inputs to the year or 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  Annual Inflation input sheet  Annual Inflation input sheet  Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as		selector switch. This sheet shows results for the selected
"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  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		company.
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  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		The "SavedResults" sheet hard-codes the values in the
run in the "UserInterface" sheet. This sheet shows the summary of results for all companies.  Monthly Inflation input sheet  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		"LiveResults" sheet for comparison and record-keeping
summary of results for all companies.  Monthly Inflation input sheet  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		purposes, after the RunForOne or RunForAll macro has been
Monthly Inflation input sheet  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		run in the "UserInterface" sheet. This sheet shows the
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		summary of results for all companies.
Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as	Monthly Inflation input sheet	The "Monthly Inflation" sheet shows the values for monthly
occupiers' housing costs (CPIH) and Price index (PI), as	Annual Inflation input sheet	outturn and forecast price indices relating to the Retail Price
		Index (RPI), Consumer Price Inflation including owner-
defined in chapter 2 of PCFH.		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.
Company-specific input	The blue and grey shaded inputs, also known as the PCFM
sheets	Variable Values, in each company-specific input sheet are
	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:

- GD2 Cost and Volumes RRPRegulatory Reporting Pack<sup>6</sup>
- GD2 Revenue workbook<sup>7</sup>
- Tax workbook<sup>8</sup>
- Legacy GD1 PCFM and any supporting files
- GD1 Revenue RRP (for LAR values)

<sup>&</sup>lt;sup>6</sup> Applicable to future Regulatory Years only (From the regulatory period starting 2021/22).

<sup>&</sup>lt;sup>7</sup> The GD2 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.

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

## **Reporting timescales**

- 2.8. Ofgem will maintain up-to-date copies of and make any modifications, if required, 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 Year, thereafter. 11.5
- 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 <u>relevant</u> 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 Revenue ARt<sup>12</sup> 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 GD2 PCFH.

<sup>&</sup>lt;sup>9</sup> This term is defined in Part B of Special Condition 1.1 (Interpretations and Definitions) the SpC 1.1 Part B

<sup>10</sup> See the PCFM functional cut-off dates set out in Table 2.1 of the GD2 PCFH.

<sup>&</sup>lt;sup>11</sup> See the PCFM functional cut-off dates set out in Table 2.1 of the GD2 PCFH.

<sup>12</sup> This term is defined in Part B of Special Condition 1.1 (Interpretations and Definitions) the SpC 1.1 Part B

### **Submissions**

- 2.13. By 31 August <del>2021 and by 31 July</del> prior to each Regulatory Year t<del>-thereafter<sup>13</sup></del>, the licensee must submit to the Authority the GD2 PCFM, with a completed variable values table (covering activity in the prior Regulatory Year and changes to forecast activity<sup>14</sup>), which has been run to calculate AR<sub>t</sub>.
- 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 "3.01 Finance InterfactPCFM inputs summary" sheet of the GD2 Revenue workbookRRP should be linked to the company-specific input sheets of the GD2 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.

<sup>&</sup>lt;sup>13</sup> See the PCFM functional cut-off dates set out in Table 2.1 of the GD2 PCFH.

 $<sup>^{14}</sup>$  Variable Values for Regulatory Years later than Regulatory Year t do not feed into the calculation of the term  $AR_t$ . 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.

## **Price base**

- 2.19. As described in chapter 2 of the GD2 PCFH, when ascertaining calculated revenue, the GD2 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**

GD2 Price Control Financial Handbook

GD2 Price Control Financial Model

GD2 Regulatory Instructions and Guidance (RIGs)

GD2 Regulatory Reporting Pack

GD2 Regulatory Financial Performance Reporting

Other relevant Associated Documents as listed in **Table 3.1** 

## 7. The GD2 Price Control Financial Model Variable Values

- 7.1. The variable values that can be revised during an AIP are set out in <u>Table 3.1 Table 3.1</u> below, and below and are also included as part of the PCFH.
- 7.2. For each variable value, the table provides a description, cross-references to the relevant Special Condition (SpC)(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 (RIGs), as applicable.

Table 3.1 - RIIO-GD2 variable values (VV)

VV	Description	SpC	Cross reference / Associated Document
Variant 1	Γotex Allowances PCDs		
GHRRt	Gas Holder demolitions Price Control Deliverable (WWU and NGN only)	SpC 3.25	PCFM Guidance
NARMt	Baseline Network Risk Output	SpC 3.1	PCFM Guidance
T1MDt	Tier 1 Mains decommissioned Price Control Deliverable	SpC 3.10	PCFM Guidance
T1SR <sub>t</sub>	Tier 1 Services Repex Price Control Deliverable	SpC 3.11	PCFM Guidance
BMIt	Biomethane improved access rollout Price Control Deliverable (SGN only)	SpC 3.30	PCFM Guidance
RPMt	Remote pressure management Price Control Deliverable (SGN only)	SpC 3.29	PCFM Guidance, PCD Reporting Requirements and Methodology Document
IPRt	Intermediate pressure reconfigurations Price Control Deliverable (SGN only)	SpC 3.28	PCFM Guidance
CAPt	Capital projects Price Control Deliverables	SpC 3.12	PCFM Guidance, PCD Reporting Requirements and Methodology Document
OTCt	Commercial fleet -Price Control Deliverable	SpC 3.13	PCFM Guidance
GERt	Gas escape reduction Price Control Deliverable	SpC 3.31	PCFM Guidance, PCD Reporting Requirements and Methodology Document
CROTt	Cyber Resilience OT Baseline	SpC 3.2	PCFM Guidance, PCD Reporting Requirements and Methodology Document
CRITt	Cyber Resilience IT Baseline	SpC 3.3	PCFM Guidance, PCD Reporting Requirements and Methodology Document
PSUPt	Physical security Price Control Deliverable	SpC 3.4	PCFM Guidance, PCD Reporting Requirements and Methodology Document
LMPt	London Medium Pressure Price Control Deliverable (Cadent North London only)	SpC 3.27	PCFM Guidance, PCD Reporting Requirements and Methodology Document
PWFt	Personalising welfare facilities Price Control Deliverable	SpC 3.26	PCFM Guidance

VV	Description	SpC	Cross reference / Associated Document
RDFt	Net zero and Re-opener development use it or lose it allowance	SpC 3.5	PCFM Guidance
Variant 1	Totex Allowances UMs		
REt	Tier 2A mains and services replacement volume driver	SpC 3.16	PCFM Guidance
REPt	HSE Repex policy Re-opener	SpC 3.17	PCFM Guidance, Re-opener Guidance and Application Requirements
CAMt	Coordinated adjustment mechanism Re-opener	SpC 3.8	PCFM Guidance, Re-opener Guidance and Application Requirements
HPRAt	Heat policy and energy efficiency Re-opener	SpC 3.19	PCFM Guidance, Re-opener Guidance and Application Requirements
FPAt	Fuel Poor Network Extension Scheme volume driver	SpC 3.14	PCFM Guidance, FPNES Governance Document
NZt	Net zero Re-opener	SpC 3.6	PCFM Guidance, Re-opener Guidance and Application Requirements
SMRt	Smart Metering Roll-out Costs Reopener	SpC 3.23	PCFM Guidance, Re-opener Guidance and Application Requirements
STWt	Specified Streetworks Costs Reopener	SpC 3.24	PCFM Guidance, Re-opener Guidance and Application Requirements
NLLRt	New Large Load Connections Reopener	SpC 3.22	PCFM Guidance, Re-opener Guidance and Application Requirements
CAt	Domestic Connections volume driver	SpC 3.15	PCFM Guidance
STUBt	Tier 1 Stubs Repex policy Reopener	SpC 3.18	PCFM Guidance, Re-opener Guidance and Application Requirements
DIVt	Diversions and Loss of Development Claims policy Re- opener	SpC 3.20	PCFM Guidance, Re-opener Guidance and Application Requirements
MOBS <sub>t</sub>	Multiple Occupancy Buildings safety Re-opener	SpC 3.21	PCFM Guidance, Re-opener Guidance and Application Requirements
NOITREt	Non-operational IT Capex Re- opener	SpC 3.7	PCFM Guidance, Re-opener Guidance and Application Requirements
NZPt	Net zero pre-construction works and small net zero projects re- opener	SpC 3.9	PCFM Guidance, Re-opener Guidance and Application Requirements

vv	Description	SpC	Cross reference / Associated Document
CROTREt	Cyber Resilience OT non-baseline	SpC 3.2	PCFM Guidance, PCD Reporting Requirements and Methodology Document
CRITREt	Cyber Resilience IT non-baseline	SpC 3.3	PCFM Guidance, PCD Reporting Requirements and Methodology Document
PSUPREt	Physical Security Re-Opener	SpC 3.4	PCFM Guidance, PCD Reporting Requirements and Methodology Document
RPEt	RPEs		PCFM Guidance
Actual To	otex		
41.0	Capitalisation	rate 1:	20514.0.14
ALC	Actual load related capex		PCFM Guidance
AOC	Actual other capex		PCFM Guidance
ACO	Actual business support (opex)		PCFM Guidance
ADO	Actual directs (opex)		PCFM Guidance
ARE	Actual replacement expenditure		PCFM Guidance
	Capitalisation	rate 2:	
ALCU	Actual load related capex		PCFM Guidance
AOCU	Actual other capex		PCFM Guidance
ACOU	Actual business support (opex)		PCFM Guidance
ADOU	Actual directs (opex)		PCFM Guidance
AREU	Actual replacement expenditure		PCFM Guidance
Pass thr	ough expenditure		
SLt	Shrinkage	SpC 6.1, Part D	PCFM Guidance
LFt	Licence Fee	SpC 6.1, Part A	PCFM Guidance
RBt	Prescribed Rates	SpC 6.1, Part B	PCFM Guidance
EDEt	Pension Scheme Established Deficit repair	SpC 6.1, Part A	PCFH section 7
PDt	Distribution Network Pension Deficit Charge	SpC 6.1, Part A	PCFM Guidance
TPWIt	Third Party Damage and Water Ingress Costs	SpC 6.1, Part C	PCFM Guidance
TGt	Gas Illegally Taken	SpC 6.1, Part A	PCFM Guidance

vv	Description	SpC	Cross reference / Associated Document
BD <sub>ŧ</sub>	<del>Bad Debt</del>	SpC 6.1, Part E	PCFM Guidance
ECt	NTS Exit Flat Capacity Costs and NTS Exit Flex Capacity Costs	SpC 6.1, Part A	PCFM Guidance
CDSPt	CDSP Costs	SpC 6.1, Part A	PCFM Guidance
MPt	Miscellaneous pass-through	SpC 6.1, Part A	PCFM Guidance
SLDZ <sub>t</sub>	Other - Stranraer LDZ (SGN Scotland only)	SpC 6.1 Part A	PCFM Guidance
Incentiv	ve Revenue		
CSt	Customer Satisfaction Survey ODI	SpC 4.2	PCFM Guidance
CMt	Complaints metric ODI	SpC 4.3	PCFM Guidance
UIPt	Unplanned Interruption Mean Duration ODI (NGN, SGN and WWU only)	SpC 4.5	PCFM Guidance
UIPt	Unplanned Interruption Mean Duration ODI (Cadent only)	SpC 4.5	PCFM Guidance
SMt	Shrinkage Management ODI	SpC 4.4	PCFM Guidance
CSWt	Collaborative streetworks ODI (Cadent Lon & EoE, SGN So Networks only)	SpC 4.6	PCFM Guidance
Other R	evenue Allowances		
NIAt	RIIO-2 Network Innovation Allowance	SpC 5.2	PCFM Guidance, RIIO-2 Network Innovation Allowance Governance Document
CNIAt	RIIO-1 Network Innovation Allowance	SpC 5.3	PCFM Guidance, RIIO-1 Network Innovation Allowance Governance Document
VCMt	Vulnerability and Carbon Monoxide Allowance	SpC 5.4	PCFM Guidance, VMCA Governance Document
Legacy A	Adjustments		
LPTt	Legacy pass-through	SpC 7.2	PCFH section 8, PCFM Guidance
LMODt	Legacy MOD	SpC 7.3	PCFH section 8, PCFM Guidance
LKt	Legacy K Correction	SpC 7.4	PCFH section 8, PCFM Guidance
LTRUt	Legacy TRU term	SpC 7.5	PCFH section 8, PCFM Guidance

VV	Description	SpC	Cross reference / Associated Document
NOCOt	Close out of the RIIO-1 Network Outputs	SpC 7.6	PCFH section 8, PCFM Guidance
LDRWt	Close out of the RIIO-GD1 Discretionary Reward Scheme	SpC 7.8	PCFH section 8, PCFM Guidance, Stakeholder Engagement Incentive Guidance
LBMt	Close out of the RIIO-GD1 Broad Measure of Customer Satisfaction Incentive	SpC 7.9	PCFH section 8, PCFM Guidance
LEEIt	Close out of the RIIO-GD1 Environmental Emissions Incentive	SpC 7.11	PCFH section 8, PCFM Guidance
LSHRt	Close out of the RIIO-GD1 Shrinkage Allowance Revenue Adjustment	SpC 7.10	PCFH section 8, PCFM Guidance
LFPIt	Close out of the RIIO-GD1 Fuel Poor Network Extension Scheme Incentive	SpC 7.12	PCFH section 8, PCFM Guidance
LExt	Close out of the RIIO-GD1 Exit Capacity Cost Adjustment	SpC 7.13	PCFH section 8, PCFM Guidance
LRAVt	Legacy net RAV additions (after disposals)	SpC 7.14	PCFH section 8, PCFM Guidance
LSOLR <sub>t</sub>	Legacy supplier of last resort		PCFM Guidance
Directly I	Remunerated Services		
PREDRSt	Pre-vesting directly remunerated services		PCFM Guidance
POSDRSt	Post-vesting directly remunerated services		PCFM Guidance
OIDRSt	Other income from directly remenerated services		PCFM Guidance
IDRSt	Identified directly remunerated services costs		PCFM Guidance
Finance 1	Inputs		
iBTAt	iBoxx trailing average		PCFH section 4, PCFM Guidance
RFR	Risk-free rate		PCFH section 4, PCFM Guidance
$I_j$	Sterling Overnight Index Average (SONIA)	SpC 1.1, Part B	PCFH section 2, PCFM Guidance
ANDt	Adjusted net debt		PCFM Guidance

VV	Description	SpC	Cross reference / Associated Document
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
OGPAt	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 <sup>15</sup>	Tax loss brought forward		PCFM Guidance
ARGPt	Totex Allocation to "General" tax pool		PCFM Guidance
ARSRt	Totex Allocation to "Special Rate" tax pool		PCFM Guidance
ARSBt	Totex Allocation to "Structures and Buildings" tax pool		PCFM Guidance
ARDRt	Totex Allocation to "Deferred Revenue" tax pool		PCFM Guidance
ARRt	Totex Allocation to "Revenue" tax pool		PCFM Guidance

 $<sup>^{15}</sup>$  This variable value relates to a licensee's regulatory opening tax losses and not statutory tax losses per corporation tax returns.

vv	Description	SpC	Cross reference / Associated Document
ARNQt	Totex 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 <sub>t</sub>	RIIO-1 allowed revenue		PCFM Guidance
RIIO-1 ExitAR <sub>t</sub>	RIIO-1 exit allowed revenue		PCFM Guidance
RIIO-1 SAR <sub>t</sub>	RIIO-1 supplier of last resort allowed revenue		PCFM Guidance
BRR <sub>t</sub>	Recovered revenue billed basis		PCFM Guidance
<u>BD</u> <sub>t</sub>	Bad Debt		PCFM Guidance
RRi	Recovered revenue	SpC 2.1, Part B	PCFM Guidance
<u>ExitRR</u> <sub>t</sub>	Recovered revenue – NTS Exit Flat Capacity		PCFM Guidance
<u>SRR</u> <sub>t</sub>	Recovered revenue - SOLR		PCFM Guidance
PRPt	Penal rate proportion	SpC 2.1, Part H	PCFM Guidance

# 4. Instructions for completing the PCFM Variable Values 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 <u>row and cell</u> references relate to the <u>licensee Revenue</u> input sheets of the RIIO-GD2 <u>PCFMRRP</u>.
- 4.3. Where the guidance refers to cost or other data that links to the GD2 Revenue workbook from the Cost and Volumes Regulatory Reporting Pack (C&V RRP), these values should be directly input into the GD2 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 licensee should enter its best estimate of forecast costs and outputs data into the yellow input cells of the GD2 Revenue workbook to calculate the PCFM Variable Values that will be included in the November 2021 AIP. The licensee must also populate the blue input cells in the GD2 Revenue workbook using the pre-determined allowance values taken from its licensee conditions.
- 4.5.4.2. The contents of the GD2 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 -	In general, the value of the Price Control
<b>Price Control Deliverables</b>	Deliverable is an ex-ante allowance, subtracting
	any reductions that have been directed by the
	Authority.

<sup>&</sup>lt;sup>16</sup> Licensee must select Regulatory Year t and Company's name on the "Cover" sheet of the GD2 Revenue workbook before updating PCFM Variable Values.

- Gas Holder demolitions
   Price Control Deliverable
   (WWU and NGN only)
- Baseline Network Risk
   Output
- Tier 1 Mains decommissioned Price Control Deliverable
- Tier 1 Services Repex Price Control Deliverable
- Biomethane improved access rollout Price Control Deliverable (SGN only)
- Remote pressure management Price Control Deliverable (SGN Southern only)
- Intermediate pressure reconfigurations Price Control Deliverable (SGN Scotland only)
- Capital projects Price
   Control Deliverable
- Commercial fleet Price
   Control Deliverable
- Gas escape reduction Price Control Deliverable (SGN only)
- Cyber resilience OT Baseline
- Cyber resilience IT Baseline
- Physical security Price
   Control Deliverable
- London Medium Pressure
   Price Control Deliverable
   (Cadent London only)

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

For the<u>se</u> Variable Values in rows 19:37, the actual adjustments directed by Ofgem should be input into the yellow adjustment cells in the "2.01 Revenue - PCDs" sheet of the GD2 RRP. This data will then be picked up in the allowance values on the "3.01 Revenue Interface" PCFM Input Summary sheet, 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, <u>itthey</u> should use best endeavours to forecast the expected adjustment into the yellow adjustment cells in the "PCDs" sheet.

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

- Personalising welfare facilities Price Control Deliverable (Cadent only)
- Net zero and Re-opener development fund use it or lose it allowance

## <u>Variant Totex Allowances –</u> Volume Drivers

- Tier 2A mains and services replacement volume driver
- Fuel Poor Network
   Extension Scheme volume
   driver
- Domestic Connections volume driver

For actual periods, Variable Values in rows 38,42 and 47, data should be input directly into the yellow input cells of the "2.02 Revenue - Volume Drivers Volume Drivers" sheet of the GD2 Revenue workbook RRP. This data is then picked up in the allowance values on the "3.01 Revenue Interface" PCFM Input Summary sheet, which should be used to populate the licensee input sheets in the PCFM.

#### **Forecasting**

For forecast periods relating to future Regulatory Years, the values in row 38, 42 and 47, data should be input directly into the yellow input cells of the "2.02 Revenue - Volume Drivers" sheet of the GD2 RRP"Volume Drivers" sheet of the GD2 Revenue workbook. This data will then be picked up in the allowance values on the "3.01 Revenue Interface" PCFM Input Summary sheet, which should be used to populate the licensee input sheets in the PCFM.

## Variant Totex Allowances – Re-openers

HSE policy Re-opener

- Coordinated adjustment mechanism Re-opener
- Heat policy and energy efficiency Re-opener
- Net zero Re-opener

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

- Smart Metering Roll-out Costs Re-opener
- Specified Streetworks
   Costs Re-opener
- New Large Load
   Connections Re-opener
- Tier 1 Stubs Repex policy Re-opener
- Diversions and Loss of Development Claims policy Re-opener
- Multiple Occupancy
   Buildings safety Re-opener
- Non-operational IT Capex
   Re-opener
- Net zero pre-construction works and small net zero projects re-opener
- Cyber resilience OT nonbaseline
- Cyber resilience IT nonbaseline
- Physical Security Re-Opener

adjustments are provided by directions from the Authority.

#### Within the application window

For the<u>se</u> Variable Values in rows 39:55, where actual amounts are known at the time of the dry run, i.e. 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's allowance and adjustment yellow input cells in the "2.03 Revenue - Re-openers" sheet. This data will then be picked up in the allowance values on the "3.01 Revenue Interface" PCFM Inputs Summary sheet, which should be used to populate the licensee input sheets in 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.

#### 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 "2.03 Revenue - Re-openers" sheet.

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 the adjusted allowance should be based on the information that the licensee has provided in the "11.05 Other Re-opener Pipeline" sheet 'Re-opener pipeline log' of in the GD2-Cost and Volumes RRP.

Any supporting justification should be provided in addition to the log as per the re-opener guidance specified in the GD RIGs.<sup>17</sup>

#### **Actual Totex**

Totex is reported in one of two buckets, capitalisation rate 1 and capitalisation rate 2.

Any expenditure relating to ex-ante, or baseline funded activities including PCDs is subject to capitalisation rate 1.

Any expenditure relating to activities that have been funded under Uncertainty Mechanisms (as labelled in the PCFM) is subject to capitalisation rate 2.

For totex the values in rows 66:77, actual and forecast data for the reporting period in question will be automatically linked from the "1.01 Summary Totex" sheet to the "should be input directly into the yellow input cells of the "3.01

<sup>&</sup>lt;sup>17</sup> 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.

Revenue Interface" PCFM Inputs Summary" sheet of the GD2 RRP. These values should be used to populate the licensee input sheets in the PCFM. evenue workbook, which should be used to populate the PCFM.

#### **Forecasting**

Forecasts for future regulatory periods should be input directly into the yellow input cells of the "PCFM Inputs Summary" sheet of the GD2
Revenue workbook, which should be used to populate the PCFM.

#### Pass-through costs - other

- Shrinkage
- Licence Fee
- Prescribed Rates
- Pension Scheme
   Established Repair Costs
- Distribution Network
   Pension Deficit charge
- Third Party Damage and Water Ingres costs
- Gas Illegally taken
- Bad Debt (Further guidance provided below)
- NTS Exit Flat and Flex Capacity Costs
- CDSP Costs
- Miscellaneous Passthrough costs
- Stranraer LDZ (SGN Scotland only)

Pass-through costs are specified costs that are predominantly outside of a licensee's control and may be passed through to consumers. These costs are defined in SpC 6.1 (Pass-through items)—and are reported within the Cost and Volumes RRP.

For pass-throughthe Variable Values in rows 81:92, actual data for the reporting period in question should be input directly into the yellow input cells of the "2.04 Revenue-Pass-through costsPass through costs" sheet of the GD2 Revenue workbookRRP. This data will then be picked up in the allowance values on the "3.01 Revenue Interface" PCFM Input Summary sheet, which should be used to populate the licensee input sheets in the PCFM.

Where required, further detailed guidance for updating these variable values <u>iswill be</u> provided in the GD RIGs.

For Licence fees: where a rebate is given by Ofgem in relation to Licence fee costs for the previous regulatory year, that rebate should be netted off against the Licence Fee costs, when reported in the PCFM.

Eg if Ofgem provides a rebate to networks in the 21/22 year, relating to the 20/21 year, the licensee may either restate its Licence fee variable value for the regulatory year 20/21 or it may net off the rebate from the licence fee variable value for the 2021/22 regulatory year.

#### **Forecasting**

Forecasts for future regulatory periods should be input directly into the yellow input cells of the "2.04 Revenue-Pass-through costsPass-through costs" sheet of the GD2 Revenue workbookRRP. This data will then be picked up in the allowance values on the "3.01 Revenue InterfacePCFM Input Summary sheet" sheet, which should be used to populate the licensee input sheets in the PCFM.

#### Pass-through costs Bad Debt

Bad Debt costs relate to any amounts that are incurred (or forecast) by the licensee due to network charges owed to it by one or more defaulting gas shippers and are treated as pass-through under SpC 6.1 (Pass through items).

Values should be input into the yellow input cells of the bad debt section of the "2.04 Revenue-Pass through costs Pass Through" sheet. This data is then picked up in the PCFM Input Summary "3.01 Revenue Interface" sheets, which should be used to populate the licensee input sheets in the PCFM.

The *Provisional Bad Debt cost* should include the Bad Debt costs that the licensee expects to incur

including any COVID-19 Bad Debt, with respect to network charges owed to the licensee by one or more Defaulting Gas Shippers. This row contains forecasts only and should not include any actual costs, which should be input in the row below labelled Actual Bad Debt cost incurred.

For the Interest income accrued adjustment value, the licensee should input the adjustment for any interest income relating to late or non-payment of network charges. The adjustment is the difference between interest accrued at the default rates set out in the Uniform Network Code net of WACC with respect to the COVID-19 Scheme. Where this is an income amount, this should be entered as a negative.

The Recovered Bad Debt value should be input as a positive value and should include the aggregate value of any Bad Debt recovered (including COVID-19 Bad Debt), where the costs have previously been recovered via the BDA term.

All values should be exclusive of VAT.

# Incentive revenue (Output Delivery Incentives)

- Customer Satisfaction
   Survey ODI
- Complaints metric ODI
- Unplanned Interruption
   Mean Duration ODI (NGN,
   SGN and WWU only)
- Unplanned Interruption
   Mean Duration ODI
   (Cadent only)

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

For the values in rows 98:103ODI values, actual data for the reporting period in question should be input directly into the yellow input cells of the "2.05 Revenue - ODIOutput Delivery Incentives" sheet of the GD2 Revenue workbookRRP. This data will then be picked up in the allowance values on the "3.01 Revenue Interface" sheet, which

- Shrinkage Management ODI
- Collaborative streetworks
   ODI (Cadent Lon & EoE,
   SGN So only)

should be used to populate the licensee input sheets in the PCFM.

PCFM Input Summary sheet, which should be used to populate the PCFM.

Further detailed guidance for updating these variable values will be provided in the GD RIGs.

#### **Forecasting**

Forecasts for future regulatory periods should be input directly into the yellow input cells of the "2.05 Revenue - ODIOutput Delivery Incentives" sheet of the GD2 Revenue workbook RRP. This data will then be picked up in the allowance values on the "3.01 Revenue Interface" sheet, which should be used to populate the licensee input sheets in the PCFM Input Summary sheet, which should be used to populate the PCFM.

#### **Other Revenue allowances**

- RIIO-2 network innovation allowance
- Carry-over Network
   Innovation Allowance
- Vulnerability and carbon monoxide allowance

For the ORA Variable Vvalues in rows 107:112, actual data for the reporting period in question should be input directly into the yellow input cells of the "2.06 Revenue – ORA" Other Revenue Allowances (ORAt)" sheet of the GD2 Revenue workbook RRP. This data will then be picked up in the allowance values on the "3.01 Revenue Interface" sheet, which should be used to populate the licensee input sheets in the PCFM Input Summary sheet, which should be used to populate the PCFM.

With respect to *Total NIA Expenditure, licensee* must input expenditure excluding any expenditure which is deemed to be 'Unrecoverable NIA Expenditure' as it does not satisfy the requirements of the RIIO-2 NIA Governance Document.

Further detailed guidance for updating these variable values will beis provided in the GD RIGs.

#### **Forecasting**

Forecasts for future regulatory periods should be input directly into the yellow input cells of the "2.06 Revenue – ORA" Other Revenue Allowances (ORAt)" sheet of the GD2 Revenue workbook RRP. This data will then be picked up in the allowance values on the "3.01 Revenue Interface" sheet, which should be used to populate the licensee input sheets in the PCFM Input Summary sheet, which should be used to populate the PCFM.

Legacy MOD

Legacy values will be directed by Ofgem following the formal close-out of the RIIO-GD1 price control.

In the interim period between the beginning of GD2 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 GD1 PCFM for any outturn data relating to the 2020/21 Regulatory Year as taken from its 31 August 2021 RIGs submissions. The legacy GD1 PCFM must then be run to generate the legacy MOD<sub>2022/23</sub> value. This should then be inflated using the RPIF figure from the GD1 Revenue RRP and input in the 'LMOD' variable value input row in the licensee-specific input sheets in the GD2 PCFM for 2022/23.

The Licensee may choose to incorporate other modifications as it considers necessary to the

Legacy GD1 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 GD1 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-GD1 price control.

In the interim period between the beginning of GD2 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 GD1 PCFM for any outturn data relating to the 2020/21 Regulatory Year as taken from its 31 August 2021 RIGs submissions. The legacy GD1 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 GD2 PCFM, covering the historical GD1 period to 31 March 2021.

The Licensee may choose to incorporate other modifications as it considers necessary to the Legacy GD1 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 GD1 PCFM along with a justification for them in its PCFM Dry Run Commentary (see section 5 of this Guidance). **Other Legacy adjustments** Legacy values will be directed by Ofgem following Legacy pass-through items the formal close-out of the RIIO-GD1 price control. Legacy K correction Legacy TRU In the interim period between the beginning of Close out of the RIIO-GD1 GD2 and the direction of these values following the close-out of GD1, the licensee must use the **Network Outputs** Close out of the RIIO-GD1 legacy values for input in rows 116:127 of the Discretionary Reward Scheme PCFM in accordance with the processes set out in Close out of the RIIO-GD1 Broad the "Legacy Adjustment to Revenue section" of Measure of Customer Satisfaction chapter 8 of the PCFH. Incentive Close out of the RIIO-GD1 **Environmental Emissions** Incentive Close out of the RIIO-GD1 Shrinkage Allowance Revenue Adjustment Close out of the RIIO-GD1 Fuel Poor Network Extension Scheme Incentive Close out of the RIIO-GD1 Exit Capacity Cost Adjustment This value should be provided by licensees. This Other Legacy adjustments value is the SOLR component of the Legacy pass-SOLR Legacy SOLR through items. **Directly remunerated services** For the values in rows 131:134, actual and Pre-vesting directly remunerated forecast data for the reporting period in question services should be input directly into the yellow input cells Post-vesting directly remunerated in "3.01 Revenue\_InterfacePCFM Inputs services

Other income from directly	Summary" sheet, which should be used to
remunerated services	populate the <u>licensee input sheets of the</u> PCFM.
Identified directly remunerated	
services costs	
iBoxx trailing average (iBTAt)	These finance inputs are calculated by the
Risk-free rate (RFR)	Authority using the WACC allowance model and
	feed into the licensee's allowed return on capital.
	The <u>se input</u> values in rows 138:139 are calculated
	and populated by Ofgem during the final dry run
	of each AIP, which usually takes place in early
	November.
	Those values are coursed from the undated WACC
	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	This finance input is calculated by the Authority
(It)	using the WACC allowance model and is used in
	calculation of the correction term (K <sub>t</sub> ).
	The input value in this row 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	This value (%) is calculated by the Authority and
growth rate	is sourced directly from the updated RPE model in
growth rate	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-24 RFPR Guidance for further detail
	on what this value comprises.
	·
Tax deductible net interest cost	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.
	The figures used to update this variable value
	should be those reported as "Net Interest as per
	the Regulatory (RIIO-21) definition" in the
	licensee's submitted RFPR.
	See the RIIO-21 RFPR Guidance for further detail
	on what this value comprises.
Tax liability allowance	This value will not be applicable unless the
adjustments – driven by tax	licensee has followed the notification process set
trigger events	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	This value will not be applicable unless the
adjustments	Authority has directed a value following a tax
	review under Special Condition 2.2.
Capital allowance opening pools	Legacy values will be directed by Ofgem following
brought forward	the formal close-out of the RIIO-GD1 price control.
brought forward	the formal close out of the KITO GDT price control.
	In the interim period between the beginning of
	GD2 and the direction of these values following
	the close-out of GD1, the licensee must use the
	provisional closing balances taken from the legacy
	GD1 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 <sup>18</sup>	As above for "Capital allowance opening pools
	brought forward".
Tax pool allocation rates	For these values in rows 159:164, the rates used
	to allocate totex into the different tax pools can be
	updated using the calculations in the "2.07
	Revenue-TaxPoolTotex AllocTax Pools Totex
	allocations" sheet of the GD2 Revenue
	workbookRRP.
	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

 $^{18}$  This variable value relates to a licensee's regulatory opening tax losses and not statutory tax losses per corporation tax returns.

	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 - billed basis	This variable value should be provided by
	licensees. This value should be Recovered
	Revenue as defined below, but inclusive of Bad
	Debt.
Bad Debt	Bad Debt costs relate to any amounts that are
	incurred (or forecast) by the licensee due to
	network charges owed to it by one or more
	defaulting gas shippers.
	Values should be input into the yellow input cells
	of the bad debt section of the "2.08 Revenue -
	Recovered Rev" sheet. This data is then picked up
	in the "3.01 Revenue Interface" sheet, which
	should be used to populate the licensee input
	sheets in the PCFM.
	The provisional Bad Debt cost should include the
	Bad Debt costs that the licensee expects to incur
	including any COVID-19 Bad Debt, with respect to
	network charges owed to the licensee by one or
	more Defaulting Gas Shippers. This row contains
	forecasts only and should not include any actual
	costs, which should be input in the row below
	<u>labelled actual Bad Debt cost incurred.</u>
	For the <b>!</b> interest income accrued adjustment
	value, the licensee should input the adjustment for
	any interest income relating to late or non-
	payment of network charges. The adjustment is

	the difference between interest accrued at the
	default rates set out in the Uniform Network Code
	net of WACC with respect to the COVID-19
	Scheme. Where this is an income amount, this
	should be entered as a negative.
	The recovered Bad Debt value should be input as
	a positive value and should include the aggregate
	value of any Bad Debt recovered (including
	COVID-19 Bad Debt), where the costs have
	previously been recovered via the BDA term.
	All values should be exclusive of VAT.
Recovered Revenue	This variable value <u>i</u> as defined in SpC 2.1, Part B
	of GD Licence should be provided by licensees
	and input directly into company specific input
	sheets of the GD2 PCFM.
Exit-Recovered Revenue - NTS	This variable value should be provided by
Exit Flat Capacity	licensees and This variable value representsis the
	amount of rRecovered Rrevenue as defined in SpC
	2.1 Part B of the GD Licencse that relates to NTS
	Exit Flat Capacity costs as defined in Standard
	Special Condition A3 (Definitions and
	Interpretation)exit, only.
SOLR Recovered Revenue - SoLR	This variable value should be provided by
	licensees and represents the amount of recovered
	revenue that relates to Supplier of Last Resort
	costs, only. This variable value is the amount of
	Recovered Revenue as defined in SpC 2.1 Part B
	of the GD Licencse that relates to supplier of last
	resort only.
Penal rate proportion	This value will be calculated and input by Ofgem.
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.
	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
is available as at 51 october

## 8. PCFM Dry Run Commentary

## **Background**

- 5.1. Theis 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 VolumesGD2 RRP, Legacy PCFM or forecast data;
- a description of the impact of the changes on ADJR and Allowed Revenue ARt 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.<sup>19</sup>
- 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 VolumeGD2 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 <u>itthey</u> 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 (by network for Cadent). 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 <u>itstheir</u> submission. Any cross-referencing should clearly direct the Authority to the source data used eg, through hyperlinks.

<sup>&</sup>lt;sup>19</sup> 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.