

## Guidance

GT2 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-GT2.

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## 1. Introduction

## **Background**

1.1. This document is part of the Regulatory Instructions and Guidance (RIGs) for RIIO-GT2.

The term RIGs is the framework that allows Ofgem¹ to collect accurate and consistent information from network operator (licensee). Ofgem provides a Revenue Reporting Pack (RRP) and instructions and guidance for how the licensee should fill the RRP for submission.

1.1.1.2. The PCFM GuidanceThis document provides network operators (licensees) with information on how to fill out the revenue sheets within the RIIO-GT2 RRP. The data in the revenue sheets is used to calculate the vast majority of the Price Control Financial Model (PCFM) Variable Values<sup>2</sup> and any underlying templates that feed into them, which they the licensee are is 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.

1.4. This document should be read in conjunction with chapter 2 of the GT2 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 GT2 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>3</sup>: Regulatory Instructions and Guidance ('the RIGs Licence Condition') of the gas transporter licence conditions applicable to the Gas Transmission Network.

<sup>&</sup>lt;sup>1</sup> 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> This term is defined in Part B of Special Condition 1.1 (Interpretations and Definitions).

<sup>&</sup>lt;sup>3</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 Gas Transmission Network.

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 GT2 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 GT2 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 <a href="the-GT2">the-GT2</a> Price Control Financial Handbook, the dry runs process entails amending and confirming values for each Regulatory Year over a number of months, from 31 <a href="July4August">July4August</a> to early November, on an iterative basis to account for updates to the <a href="PCFM">PCFM</a> 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 <u>Annual Iteration ProcessAIP</u>;
- 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.

<sup>&</sup>lt;sup>4</sup> 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 ( $\mathsf{AR}_t$ ) 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 (Transportation owner revenue restriction) and Special Condition 2.3 (System operator 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.	

Input	The Input tab is the starting point for all calculations in the
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
SystemOperator	conditions for the TO and SO.
FuelPoor	
Return&RAV	
TaxPools	
Finance&Tax	
NonCore	
ReturnAdj	
Revenue	
AR	
SOAR	
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.		
NGGT TO	The blue and grey shaded inputs, also known as the PCFM		
NGGT SO	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:

- Cost and VolumesGT2 RRP-Regulatory Reporting Pack<sup>5</sup>
- GT2 Revenue workbook<sup>6</sup>
- Tax workbook<sup>7</sup>
- Legacy GT1 PCFM and any supporting files
- GT1 Revenue RRP (for LAR values)

<sup>&</sup>lt;sup>5</sup> Applicable to future Regulatory Years only (From the regulatory period starting 2022/23).

<sup>&</sup>lt;sup>6</sup> The GT2 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.

<sup>&</sup>lt;sup>7</sup> Applicable to future Regulatory Years only (regulatory period starting 2022/23).

## **Reporting timescales**

- 2.7. The licensee must submit the PCFM, the required supporting models and commentary to the Authority by 31 August <del>2021 and by 31 July prior to each Regulatory Year t<sup>8</sup>, thereafter.<sup>9</sup></del>
- 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 Year 10, 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 Revenue ARt<sup>11</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 GT2 PCFH.

## **Submissions**

2.13. By 31 August <del>2021 and by 31 July</del> prior to each Regulatory Year t thereafter<sup>12</sup>, the licensee must submit to the Authority the GT2 PCFM, with a completed variable values table

<sup>8</sup> This term is defined in Part B of Special Condition 1.1 (Interpretations and Definitions).

<sup>&</sup>lt;sup>9</sup> See the PCFM functional cut-off dates set out in Table 2.1 of the GT2 PCFH.

<sup>&</sup>lt;sup>10</sup> See the PCFM functional cut-off dates set out in Table 2.1 of the GT2 PCFH.

<sup>&</sup>lt;sup>11</sup> This term is defined in Part B of Special Condition 1.1 (Interpretations and Definitions).

<sup>12</sup> See the PCFM functional cut-off dates set out in Table 2.1 of the GT2 PCFH. 12

(covering activity in the prior Regulatory Year and changes to forecast activity  $^{12+3}$ ), which has been run to calculate AR<sub>t</sub>.

- 2.14. As well as this, the 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 GT2 Revenue workbook RRP should be linked to the company-specific input sheets of the GT2 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.

 $<sup>^{12}</sup>$  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.

 $<sup>^{13}</sup>$  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 GT2 PCFH, when ascertaining calculated revenue, the GT2 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**

GT2 Price Control Financial Handbook

GT2 Price Control Financial Model

GT2 Regulatory Instructions and Guidance (RIGs)

GT2 Regulatory Reporting Pack

GT2 Regulatory Financial Performance Reporting

Other relevant Associated Documents as listed in **Table 3.1** and **Table 3.2** 

## 3. The GT2 Price Control Financial Model Variable Values

- 3.1. The variable values that can be revised during an AIP are set out in  $\frac{\text{Table 3.1}}{\text{Table 3.2}}$  and  $\frac{\text{Table 3.2}}{\text{Table 3.2}}$  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 (RIGs) as applicable.

Table 3.1 - RIIO-GT2 variable values (VV) for TO

VV	Description	SpC	Cross reference /				
	Variant Totex Allowances PCDs						
NARMt	Baseline Allowed NARM Expenditure	SpC 3.1	PCFM Guidance, Network Asset Risk Workbook, NARM Handbook				
PSUPt	Physical security Price Control Deliverable	SpC 3.4	PCFM Guidance, Re-opener Guidance and Application Requirements				
BTR <sub>t</sub>	Bacton terminal site redevelopment Price Control Deliverable	SpC 3.10	PCFM Guidance, PCD Reporting Requirements and Methodology Document				
KLSt	King's Lynn subsidence Price Control Deliverable	SpC 3.12	PCFM Guidance, Re-opener Guidance and Application Requirements				
NLAt	Asset health - non lead assets Price Control Deliverable	SpC 3.15	PCFM Guidance, PCD Reporting Requirements and Methodology Document				
CEPt	Compressor emissions Price Control Deliverable	SpC 3.11	PCFM Guidance, Re-opener Guidance and Application Requirements				
RAt	Redundant Assets Price Control Deliverable	SpC 3.16	PCFM Guidance, PCD Reporting Requirements and Methodology Document				
FIOCt	Funded incremental obligated capacity Price Control Deliverable	SpC 3.13	PCFM Guidance, Re-opener Guidance and Application Requirements				
CROTt	Cyber Resilience OT Price Control Deliverable and use it or lose it allowanceBaseline	SpC 3.2	PCFM Guidance				
CRITt	Cyber Resilience IT Price Control DeliverableBaseline	SpC 3.3	PCFM Guidance, Re-opener Guidance and Application Requirements				
RDFt	Net Zero And Re-opener Development Fund use it or lose it allowance	SpC 3.5	PCFM Guidance, Re-opener Guidance and Application Requirements				
Variant T	otex Allowances UMs						
NARMAHt	NARM Asset Health Re-opener	SpC 3.1	PCFM Guidance, Re-opener Guidance and Application Requirements				
NOIT <u>RE</u> t	Non-operational IT Capex Re-opener	SpC 3.7	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				

			DCEM Cuidanas Da ananan
$NZ_{t}$	Net Zero Re-Opener	SpC 3.6	PCFM Guidance, Re-opener Guidance and Application Requirements
AHt	Asset health Re-Opener	SpC 3.14	PCFM Guidance, Re-opener Guidance and Application Requirements
NLAAHt	Asset Health - Non Lead Assets Reopener	SpC 3.15	PCFM Guidance, Re-opener Guidance and Application Requirements
QL <sub>t</sub> and PD <sub>t</sub>	Uncertain Costs Re-opener	SpC 3.17	PCFM Guidance, Re-opener Guidance and Application Requirements
NZPt	Net zero Pre-construction Work and Small Net Zero Projects Re-opener	SpC 3.9	PCFM Guidance, Net Zero Pre-construction Work and Small Net Zero projects Re-opener Governance Document
BTREt	Bacton terminal site redevelopment Price Control Deliverable - Re-Opener Element	SpC 3.10	PCFM Guidance, Re-opener Guidance and Application Requirements
PSUPREt	Physical Security Price Control Deliverable - Re-Opener Element	SpC 3.4	PCFM Guidance, Re-opener Guidance and Application Requirements
CEPREt	Compressor Emissions Price Control Deliverable - Re-Opener Element	SpC 3.11	PCFM Guidance, Re-opener Guidance and Application Requirements
CROTREt	Cyber resilience OT <del>(non-TIM)</del> Price Control Deliverable Re-Opener Elementnon-baseline	SpC 3.2	PCFM Guidance, Re-opener Guidance and Application Requirements
CRITREt	Cyber resilience IT <del>(TIM)</del> Price Control Deliverable Re-Opener Elementnon-baseline	SpC 3.3	PCFM Guidance, Re-opener Guidance and Application Requirements
KLSREt	King's Lynn subsidence Price Control Deliverable - Re-Opener Element	SpC 3.12	PCFM Guidance, Re-opener Guidance and Application Requirements
FIOCREt	Funded Incremental Obligated Capacity Price Control Deliverable - Re-Opener Element	SpC 3.13	PCFM Guidance, Re-opener Guidance and Application Requirements, Guidance on the Incremental Obligated Capacity Re- opener
OEt	Opex Escalator	SpC 3.18	PCFM Guidance
Actual To			
ALC.	Capitalisation rate	e 1:	DCEM Cuidanas
ALC	Actual load related capex expenditure  Actual asset replacement capex expenditure		PCFM Guidance PCFM Guidance
AOC	Actual other capex expenditure		PCFM Guidance
ACO	Actual non-load (opex)		PCFM Guidance
AIO	Actual indirects (opex)		PCFM Guidance
ANC	Actual non-operational capex	2.	PCFM Guidance
ALCU	Capitalisation rate Actual load related capex expenditure	± ∠: 	PCFM Guidance
ALCU	Actual load related capex expellulture		1 CI M Guidance

A D C L L	A street a sectional section and section		DCEM Cuidens
ARCU	Actual asset replacement capex expenditure		PCFM Guidance
AOCU	•		PCFM Guidance
ACOU	Actual other capex expenditure Actual non-load (opex)		PCFM Guidance
AIOU			PCFM Guidance
ANCU	Actual indirects (opex)		PCFM Guidance
	Actual non-operational capex		PCFM Guidance
	ugh expenditure Prescribed Rates	CnC	PCFM Guidance
RBt	Prescribed Rates	SpC 6.1,	PCFM Guidance
		Part B	
LFt	Licence Fees	SpC	PCFM Guidance
		6.1,	
		Part A	
EDEt	Pension deficit charge	SpC	PCFM Guidance
	_	6.1,	
		Part A	
<del>BD</del> ŧ	<del>Bad Debt</del>	<del>SpC</del>	PCFM Guidance
		<del>6.1,</del>	
		Part C	
OPTC <sub>t</sub>	Secretary of State in respect of Policing	SpC	PCFM Guidance
	Costs	6.1,	
ISt	Cas convoyed to Independent Systems	Part A	PCFM Guidance
15t	Gas conveyed to Independent Systems (SIU)	SpC 6.2	PCFM Guidance
PTVt	PARCA Termination Value	SpC	PCFM Guidance
1 1 V (	TARCA Terrimation value	6.1,	Term duidance
		Part D	
Hyt	Hy-Net	SpC	PCFM Guidance
,	,	6.1,	
		Part E	
NZPSt	Distribution Networks' Net Zero Pre-	SpC	PCFM Guidance
	construction Work and Small Net Zero	6.1,	
	Projects Re-opener	Part F	
Incentive		0.040	20514 0 11
CSIt	Customer satisfaction incentive	SpC 4.2	PCFM Guidance
FCT		0.042	DOEM C : I
ESIt	Environmental scorecard output delivery incentive	SpC 4.3	PCFM Guidance
Other Boy	enue Allowances		
NIA <sub>t</sub>	RIIO-2 Network Innovation Allowance	SpC 5.2	PCFM Guidance, RIIO-2
INIAt	KIIO-2 Network Illiovation Allowance	3pc 3.2	NIA Governance Document
			NIA Governance Document
CNIAt	Carry-over RIIO-1 Network Innovation	SpC 5.3	PCFM Guidance, RIIO-1
0112710	Allowance	0000.0	NIA Governance Document
SIFFt	Strategic Innovation Fund	SpC 5.7	SIF Governance
	-		Document, PCFM Guidance
Legacy Ad			
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
LTRU <sub>t</sub>	Legacy TRU term	SpC 7.5	PCFH section 8, PCFM Guidance
NOCOt	Close out of the RIIO-GT1 network outputs	SpC 7.6	PCFH section 8, PCFM Guidance
NICFt	RIIO-1 network innovation competition	SpC 7.7	PCFH section 8, PCFM Guidance
SSCO <sub>t</sub>	Close out of the RIIO-GT1 stakeholder satisfaction output	SpC 7.8	PCFH section 8, PCFM Guidance
LRAVt	RIIO-1 net RAV additions (after disposals)	SpC 7.9	PCFH section 8, PCFM Guidance
Directly R	emunerated Services		
PREDRSRt	<u>DPre-vesting directly remunerated</u> services <u>revenue</u>	SpC 9.7	PCFM Guidance
POSDRS <u>C</u> t	services cost	SpC 9.7	PCFM Guidance
<del>OIDRS</del> ŧ	Other income from directly remunerated services	<del>SpC 9.7</del>	PCFM Guidance
<del>IDRS</del> ŧ	Identified directly remunerated services costs	<del>SpC 9.7</del>	PCFM Guidance
Finance I	nputs		
RFR	Risk-free rate		PCFH section 4, PCFM Guidance
iBTA <sub>t</sub>	iBoxx trailing average		PCFH section 4, PCFM Guidance
$I_j$	Sterling Overnight Index Average (SONIA)	SpC 1.1, Part B	PCFH section 2, PCFM Guidance
RPEt	RPE annual growth		PCFM Guidance
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>OGPA</u> t	General pool opening balance adjustment	_	PCFM Guidance
<u>OSRPAt</u>	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	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
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-1 AR <sub>t</sub>	RIIO-1 allowed revenue		PCFM Guidance
<u>BRR</u> t	Recovered revenue billed basis		PCFM Guidance
<u>BDt</u>	Bad debt		PCFM Guidance
RRt	Recovered revenue	SpC 2.1, Part B	PCFM Guidance
PRPt	Penal rate proportion	SpC 2.1 Part H	PCFM Guidance
<del>RR</del> ŧ	Recovered revenue	SpC 2.1, Part B	PCFM Guidance

Table 3.2 - RIIO-GT2 variable values (VV) for SO

vv	Description	SpC	Cross	reference / Associated Document
Variant To	tex Allowances PCDs			
FIOCt	Funded Incremental Obligated Capacity Price Control Deliverable		SpC 3.13	PCFM Guidance, Guidance on the Incremental Obligated Capacity Re-opener
CROTt	Cyber resilience OT <del>(non-TIM)</del> Control Deliverable Baseline	Price	SpC 3.2	PCFM Guidance, PCD Reporting Requirements and Methodology Document

vv	Description SpC	Cross	reference / Associated Document	
CRITt	Cyber resilience IT <u>Baseline(TIM) Price</u> Control Deliverable	SpC 3.3	PCFM Guidance, PCD Reporting Requirements and Methodology Document	
Variant Tote	x Allowances UMs			
CROTREt	Cyber resilience OT <del>(non-TIM)</del> Price Control Deliverable Re-Opener Elementnon-baseline	SpC 3.2	PCFM Guidance, Reopener Guidance and Application Requirements	
CRITREt	Cyber resilience IT <del>(TIM) Price Control</del> Deliverable Re-Opener Elementnon-baseline	SpC 3.3	PCFM Guidance, Reopener Guidance and Application Requirements	
NZt	Net Zero Re-Opener	SpC 3.6	PCFM Guidance, Reopener Guidance and Application Requirements	
FIOCREt	Funded Incremental Obligated Capacity Price Control Deliverable - Re-Opener Element	SpC 3.13	PCFM Guidance, Reopener Guidance and Application Requirements, Guidance on the Incremental Obligated Capacity Reopener	
NOIT <u>RE</u> t	Non-operational IT Capex Re-opener	SpC 3.7	PCFM Guidance, Reopener Guidance and Application Requirements	
OEt	Opex Escalator	SpC 3.18	PCFM Guidance	
Actual Totex				
SOANC	Actual non-operational capex		PCFM Guidance	
SOACO	Actual controllable opex		PCFM Guidance	
Pass throug	h expenditure			
SOEDEt	Pension Scheme Established Deficit		PCFM Guidance, PCFH Section 7	
<del>SOBD</del> ŧ	System operator bad debt	SpC 6.3, Part B	PCFM Guidance	
CDSPt	CDSP Costs, excluding costs incurred in relation to UK Link Gemini	SpC 6.3, Part A	PCFM Guidance	
Other Revenue				
CMIRt	Constraint management incentive revenue	SpC 5.5, Part B	PCFM Guidance	
RAREnCAt	Revenue from accelerated release of incr. obl. entry capacity	SpC 5.5, Part A	PCFM Guidance	

vv	Description SpC	Cross	reference / Associated Document
ExBBCNLRAt	Exit capacity buyback cost which users are liable to reimburse	SpC 5.5, Part A	PCFM Guidance
RBCt	Revenue for net residual balancing costs	SpC 5.6, Part A	PCFM Guidance
OMCt	Total costs for procurement of operating margin services	SpC 5.6, Part A	PCFM Guidance
SCt	System costs	SpC 5.6, Part A	PCFM Guidance
RBIRt	Residual balancing incentive	SpC 5.6, Part B	PCFM Guidance
QDAIRt	Quality of demand forecasting incentive revenue	SpC 5.6, Part C	PCFM Guidance
GHGIRt	Green house gas emissions incentive	SpC 5.6, Part D	PCFM Guidance
MIRt	Maintenance incentive	SpC 5.6, Part F	PCFM Guidance
Legacy Adjus	stments		
SOLMODt	System Operator legacy MOD	SpC 7.11	PCFH section 8, PCFM Guidance
SOLKt	System Operator legacy K correction	SpC 7.12	PCFH section 8, PCFM Guidance
SOLTRUt	System Operator legacy TRU term	SpC 7.13	PCFH section 8, PCFM Guidance
LCMIRt	Close out of the RIIO-GT1 entry and exit capacity constraint management incentive	SoC 7.14	PCFH section 8, PCFM Guidance
LCMCAt	Close out of the RIIO-GT1 constraint management cost adjustment	SpC 7.15	PCFH section 8, PCFM Guidance
LTSSt	Close out of the RIIO-GT1 NTS transportation support services cost adjustment	SpC 7.16	PCFH section 8, PCFM Guidance
SOLRAVt	RIIO-1 net RAV additions (after disposals)	SpC 7.17	PCFH section 8, PCFM Guidance
Finance Inpu	uts		1
SORFR	Risk-free rate		PCFH section 4, PCFM Guidance
iBTA <sub>t</sub>	iBoxx trailing average		PCFH section 4, PCFM Guidance
$I_j$	Sterling Overnight Index Average (SONIA)	SpC 1.1, Part B	PCFH section 2, PCFM Guidance

vv	Description SpC	Cross	reference / Associated Document
RPEt	RPE annual growth		PCFM Guidance
ANDt	Adjusted net debt		PCFM Guidance
TDNIt	Tax deductible net interest cost		PCFM Guidance
SOTAXAt	Tax allowance adjustment	SpC 2.4	PCFH section 6, PCFM Guidance
SOTTEt	Tax liability allowance adjustments - driven by tax trigger events		PCFH section 6, PCFM Guidance
<u>SOOGPA</u> t	General pool opening balance adjustment	_	PCFM Guidance
<u>SOOSRPA</u> t	Special Rate pool opening balance adjustment	_	PCFM Guidance
SOOGPt	General pool capital allowance opening balance brought forward		PCFM Guidance
SOOSRPt	Special Rate capital allowance opening balance brought forward		PCFM Guidance
SOOSBPt	Structures and buildings capital allowance opening balance brought forward		PCFM Guidance
SOODRPt	Deferred revenue expenditure opening balance brought forward		PCFM Guidance
SOLODRPt	Deferred revenue pool additions (RIIO1) plus opening balance at start of RIIO1		PCFM Guidance
SOOTLt	Tax loss brought forward		PCFM Guidance
SOARGPt	Allocation to "General" tax pool		PCFM Guidance
SOARSRt	Allocation to "Special Rate" tax pool		PCFM Guidance
SOARRt	Totex allocation to "Revenue" tax pool		
SOARSBt	Allocation to "Structures and Buildings" tax pool		PCFM Guidance
SOARDRt	Totex allocation to "Deferred revenue" tax pool		PCFM Guidance
SOARNQt	Allocation to "Non Qualifying" tax pool		PCFM Guidance
SOCTt	Corporation tax rate		PCFM Guidance
SOGCAt	General pool allowance rate		PCFM Guidance
SOSRCAt	Special Rate allowance rate		PCFM Guidance
SOSBCAt	Structures and buildings allowance rate		PCFM Guidance
SODRCAt	Deferred revenue expenditure allowance rate		PCFM Guidance
RIIO-1SOARt	RIIO-1 allowed revenue		
<u>BSORR</u> t	Recovered revenue billed basis		PCFM Guidance
<u>SOBD</u> <sub>t</sub>	System Operator Bad Debt		PCFM Guidance

vv	Description	SpC	Cross	reference / Associated Document
<u>SORR</u> t	Recovered revenue		<u>SpC</u> 2.3, <u>Part B</u>	PCFM Guidance
SOPRPt	Penal rate proportion		SpC 2.3 Part G	
SORRŧ	Recovered revenue		SpC 2.3, 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 licensee Revenue input sheets of the RIIO-GT2 PCFMRRP.
- 4.3. Where the guidance refers to cost or other data that links to the GT2 Revenue workbook from the Cost and Volumes Regulatory Reporting Pack (C&V RRP), these values should be directly input into the GT2 Revenue workbook for the PCFM submission due on August 31<sup>st</sup> 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 cost and output data into the yellow input cells of the GT2 Revenue workbook to calculate the PCFM Variable Values that will be included in the November 2021 AIP.
- 4.5. The contents of the GT2 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	
	In general, the value of the Price Control	
Variant Totex Allowances - Price	Deliverable is an ex-ante allowance, subtracting	
<b>Control Deliverables (PCDs)</b>	any reductions that have been directed by the	
	Authority.	
TO:		
<ul> <li>Baseline Allowed NARM</li> </ul>	The ex-ante allowances are given in the appendix	
Expenditure	for the relevant Special Condition, and the	
<ul> <li>Physical security Price Control</li> </ul>	reductions are provided by directions from the	
Deliverable	Authority.	
<ul> <li>Bacton terminal site</li> </ul>		
redevelopment Price Control	For the <u>se</u> Variable Values in rows 20:30 and rows	
Deliverable	16:21 for TO and SO respectively, the actual	

- King's Lynn subsidence Price Control Deliverable
- Asset health non lead assets
   Price Control Deliverable
- Compressor emissions Price
   Control Deliverable
- Redundant Assets Price Control Deliverable
- Funded incremental obligated capacity Price Control Deliverable
- Cyber Resilience OT\_Price
   Control Deliverable and use it or lose it allowanceBaseline
- Cyber Resilience IT Price Control Deliverable Baseline
- Net Zero And Re-opener
   Development Fund use it or lose
   it allowance

SO:

- Funded incremental obligated capacity Price Control Deliverable
- Cyber resilience OT Price Control
   Deliverable and use it or lose it
   allowanceBaseline
- Cyber Resilience IT Price Control DeliverableBaseline

adjustments directed by Ofgem should be input into the yellow adjustment cells in the "TO PCDs" and "SO PCDs" sheets of the GT2 RRP. This data will then be picked up in the allowance values on the TO and SO PCFM Input Summary sheets, which should be used to populate the licensee input sheets in the 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 "TO PCDs" and "SO PCDs" sheets of the GT2 RRP.

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

# <u>Variant Totex Allowances - Reopeners</u>

TO:

- NARM Asset Health Re-opener
- Non-operational IT Capex Reopener

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.

- Coordinated adjustment mechanism Re-opener
- Net zero Re-opener
- Asset health Re-opener
- Asset health non lead assets
   Re-opener
- Uncertain Costs Re-opener
- Net Zero Pre-construction Work and Small Net Zero Projects Reopener
- Bacton terminal site redevelopment Re-Opener
- Physical Security Re-Opener
- Compressor emissions Re-Opener
- Cyber Resilience OT Re-Openernon-baseline
- Cyber Resilience IT nonbaselineRe-Opener
- King's Lynn subsidence Re-Opener
- Funded incremental obligated capacity Re-Opener

#### SO:

- Cyber Resilience OT Re-Openernon-baseline
- Cyber Resilience IT Re-Opener
- Net Zero Re-openernon-baseline
- Funded incremental obligated capacity Re-opener
- Non-operational IT Capex Reopener

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 34:48 and rows 22:26 for TO and SO respectively, 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 yellow input cells in the "TO Reopeners" and "SO Re-openers" sheets of the GT2 RRP. This data will then be picked up in the allowance values on the TO and SO PCFM Input Summary sheets, which should be used to populate the licensee input sheets in the 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 "TO Reopeners" and "SO Re-openers" sheets of the GT2 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 the adjusted allowance should be based on the information that the licensee has provided in the "8.10 Pipeline LogRe-opener pipeline log", which will be included in the GT2 Cost and Volumes RRP.

Any supporting justification should be provided in addition to the log as per the re-opener guidance specified in the GT-RIGs.<sup>14</sup>

## **Opex Escalator**

TO:

Opex Escalator

٠

The opex escalator provides an additional allowance for any capital expenditure incurred on the eligible re-openers listed in SpC 3.18 (Opex escalator).

For the<u>se</u> Variable Value <u>in row 49</u> for TO, actual and forecast data for the eligible re-openers within UMTERM<sub>t</sub> is read into the "Opex Escalator" sheet from the "TO Re-opener" sheet of the GT2 Revenue workbookRRP.

<sup>&</sup>lt;sup>14</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.

	This data is then picked up in the allowance
	values on the TO PCFM Input Summary sheet,
	which should be used to populate the licensee
	input sheets in the the PCFM.
Actual Totex	Totex is reported in one of two buckets,
TO:	capitalisation rate 1 and capitalisation rate 2.
Capitalisation rate 1:	
Actual load related capex	Any expenditure relating to ex-ante, or baseline
expenditure	funded activities including PCDs is subject to
Actual asset replacement capex	capitalisation rate 1.
expenditure	
Actual other capex expenditure	Any expenditure relating to activities that have
Actual non-load (opex)	been funded under Uncertainty Mechanisms (as
Actual indirects (opex)	labelled in the PCFM) is subject to capitalisation
Actual non-operational capex	rate 2.
Capitalisation rate 2:	For the totex values in rows 59:73 and row 37:38
Actual load related capex	for TO and SO respectively, actual and forecast
expenditure	data for the reporting period in question will be
Actual asset replacement capex	automatically linked from the "2.1
expenditure	Revenue Interface" sheet of the GT2 RRP. These
Actual other capex expenditure	values should be used to populate the licensee
Actual non-load (opex)	input sheets in the PCFM.should be input directly
Actual indirects (opex)	into the TO and SO PCFM Input Summary sheets,
Actual non-operational capex	which should be used to populate the PCFM.
SO:	<del>Forecasting</del>
Actual non-operational capex	Forecasts for future regulatory periods should be
Actual controllable opex	input directly into the TO and SO PCFM Input
	Summary sheets, which should be used to
	populate the PCFM.
Pass through costs	Bad debt costs relate to any amounts that are
	incurred (or forecast) by the licensee due to
<del>TO:</del>	network charges owed to it by one or more
•—Bad Debt	

<del>SO:</del>

• SO Bad Debt

defaulting gas shippers and are treated as passthrough under SpC 6.1 (Transportation owner pass-through items) and SpC 6.3 (System operator pass-through items).

Values should be input into the yellow input cells of the bad debt section of the "TO PT" and "SO PT" sheets. This data is then picked up in the TO and SO PCFM Input Summary sheets, which should be used to populate the PCFM.

The Provisional Bad Debt cost should include the Bad Debt costs that the licensee expects to incur including any RIIO GT1 Bad Debt and 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 RIIO-GT1 Bad Debt and COVID-19 Bad Debt), where

the costs have previously been recovered via the BDA term. <sup>15</sup>

All values should be exclusive of VAT.

#### Pass-through costs - other

#### TO:

- Licence fees
- Prescribed Rates
- Pension Scheme Established
   Deficit repair
- Secretary of State in respect of Policing Costs
- PARCA Termination Value
- Gas conveyed to Independent Systems
- Hy-Net
- Net Zero Pre-construction Work and Small Net Zero Projects Reopener

#### SO:

- CDSP Costs
- Pension Scheme Established Deficit

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 (Transportation owner pass-through items) and SpC 6.3 (System operator pass-through items).

For the pass-through Variable Values in rows 77:85 and rows 42:44 for TO and SO respectively, actual data for the reporting period in question should be input directly into the yellow input cells of the "5.1 TO Indirects" and "5.2 SO Indirects" of the "TO PT" and "SO PT" sheets. This data is then picked up in the "TO PT" and "SO PT" which are linked to the TO and SO PCFM Input Summary sheets, which should be used to populate the licensee input sheets in the the PCFM.

Where required, further detailed guidance for updating these variable values will be is provided in the GT 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.

<sup>&</sup>lt;sup>15</sup> For the System Operator, all references to Bad Debt, COVID-19 Bad Debt and RIIO-GT1 Bad Debt should be read as SO Bad Debt, SO COVID-19 Bad Debt and RIIO-GT1 SO Bad Debt respectively.

E.g. 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 of the "5.1 TO Indirects" and "5.2 SO Indirects" sheets. "TO PT" and "SO PT" sheets. This data is then picked up in the "TO PT" and "SO PT" which are linked to the TO and SO PCFM Input Summary sheets, which should be used to populate the licensee input sheets in the PCFM. which should be used to populate the PCFM.

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

TO:

- Customer satisfaction survey
   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 91:92 for TO, actual data for the reporting period in question should be input directly into the yellow input cells of the "TO ODI" sheet relevant GT2 RRP sheet. This data is then picked up in the "4.10 TO ODI" which is linked "TO PCFM Input Summary" sheet, which should be used to populate the licensee input sheets in the the PCFM.

Further detailed guidance for updating the underlying inputs to the calculations in the ODI sheet will be provided in the GT2 RIGs.

## **Forecasting**

Forecasts for future regulatory periods should be input directly into the yellow input cells of the relevant GT2 RRP sheet "TO ODI" sheet. This data is then picked up in the "4.10 TO ODI" which is linked "TO PCFM Input Summary" sheet, which should be used to populate the licensee input sheets in the PCFM.

#### Other Revenue allowances

#### TO:

- RIIO-2 Network Innovation Allowance
- Carry-over Network Innovation Allowance
- Strategic Innovation Fund

#### SO:

- Constraint management incentive revenue
- Revenue from accelerated release of incr. obl. entry capacity
- Exit capacity buyback cost which users are liable to reimbourse
- Revenue for net residual balancing costs
- Total costs for procurement of operating margin services
- System costs
- Residual balancing incentive

For the ORA values in rows 96:100 and rows 48:58 for TO and SO respectively, actual data for the reporting period in question should be input directly into the yellow input cells of the "TO ORA" and "SOORA" sheets and into the yellow input cells of the relevant GT2 RRP sheets. This data is then picked up in the SO and TO PCFM Input Summary sheets, which should be used to populate the licensee input sheets in 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 "TO ORA" and "SOORA" sheets will be provided in the GT2 RIGs.

#### **Forecasting**

 Quality of demand forecasting incentive

- Greenhouse gas emissions incentive
- Maintenance incentive

Forecasts for future regulatory periods should be input directly into the yellow input cells of the "TO ORA" and "SOORA" sheets and into the yellow input cells of the relevant GT2 RRP sheets. This data is then picked up in the SO and TO PCFM Input Summary sheets, which should be used to populate the licensee input sheets in the PCFM.into the yellow input cells of the above referenced TO and SO sheets

#### Legacy MOD

Legacy values will be directed by Ofgem following the formal close-out of the RIIO-GT1 price control.

In the interim period between the beginning of GT2 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 GT1 PCFM for any outturn data relating to the 2020/21 Regulatory Year as taken from its 31 August 2021 RIGs submissions. The legacy GT1 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 GT1 Revenue RRP and input in the LMOD and SOLMOD variable value input row in the licensee-specific input sheets in the GT2 PCFM for 2022/23.

The Licensee may choose to incorporate other modifications as it considers necessary to the Legacy GT1 PCFM to reflect any anticipated close-out 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 GT1 PCFM along with a justification for them in its PCFM Dry Run Commentary (see section 5 of this Guidance). Legacy values will be directed by Ofgem following RIIO-1 net RAV additions (after the formal close-out of the RIIO-GT1 price disposals) control. In the interim period between the beginning of GT2 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 and SOLRAV) values in accordance with the processes set out in chapter 8 of the PCFH. The licensee must update its legacy GT1 PCFM for any outturn data relating to the 2020/21 Regulatory Year as taken from its 31 August 2021 RIGs submissions. The legacy GT1 PCFM must then be run to generate the provisional closing RAV position and this should be input in the LRAV and SOLRAV variable value input row in its licensee-specific input sheet in the GT2 PCFM, covering the historical GT1 period to 31 March 2021. The Licensee may choose to incorporate other modifications as it considers necessary to the Legacy GT1 PCFM to reflect any anticipated closeout adjustments for which Ofgem has not yet provided a methodology, in its LRAV and SOLRAV values.

If the Licensee chooses to do this, it must also submit a description of the specific modifications made to the Legacy GT1 PCFM along with a justification for them in its PCFM Dry Run Commentary (see section 5 of this Guidance).

#### **Other Legacy adjustments**

#### TO:

- Legacy pass-through
- Legacy K correction
- Legacy TRU
- Close out of the RIIO-GT1 network outputs
- RIIO-GT1 network innovation competition
- Close out of the RIIO-GT1 stakeholder satisfaction output

### SO:

- System Operator legacy K correction
- System Operator legacy TRU term
- Close out of the RIIO-GT1 entry and exit capacity constraint management incentive
- Close out of the RIIO-GT1 constraint management cost adjustment
- Close out of the RIIO-GT1 transportation support services adjustment

Legacy values will be directed by Ofgem following the formal close-out of the RIIO-GT1 price control.

In the interim period between the beginning of GT2 and the direction of these values following the close-out of GT1, the licensee must use the legacy values for input in rows 105:111 and 65:69 for TO and SO respectively, 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** For the DRS values in rows 116:119 for NGGT-TO: TO, actual and forecast data for the reporting period in question should be input directly into <u>D</u><del>Pre vesting d</del>irectly the yellow input cells in the "TO PCFM Input remunerated services revenue Summary" sheet of the GT2 RRP, which should be <u>D</u>Post vesting directly used to populate the licensee input sheets in the remunerated services cost Other income from directly the PCFM. remenerated services -Identified directly remunerated services costs iBoxx trailing average (iBTA<sub>t</sub>) These finance inputs are calculated by the Risk-free rate (RFR and SORFR) Authority using the WACC allowance model and feed into the licensee's allowed return on capital. These input values in rows 123:124 and rows 74:75 for TO and SO respectively, 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. This finance input is calculated by the Authority Sterling Overnight Index Average (It) using the WACC allowance model and is used in calculation of the correction term (Kt). The input value in row 125 and row 76 for TO and SO respectively, 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	This value (%) is calculated by the Authority and
rate	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 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 Grown and be under the
	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.
	Soo the DIIO 21 DEDD Cuidenes for fruther data:
	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	Legacy values will be directed by Ofgem following
brought forward	the formal close-out of the RIIO-GT1 price
	control.
	In the interim period between the beginning of
	GT2 and the direction of these values following
	the close-out of GT1, the licensee must use the
	provisional closing balances taken from the
	legacy GT1 PCFM to populate the Capital
	allowance opening pools brought forward
	balances in its RIIO-2 PCFM.
	The desire heleness should some form the same
	The closing balances should come from the same
	version of the legacy GT1 PCFM that the LRAV,
	SOLRAV, LMOD and SOLMOD values are taken
	from.
Tax loss brought forward <sup>16</sup>	As above for "Capital allowance opening pools
. an issa straight to Mara	brought forward".
Tax pool allocation rates	For these values in rows 144:149 and rows
	95:100 for TO and SO respectively, the rates
	used to allocate totex into the different tax pools
	can be updated using the calculations in the "TO
	Tax Pools Totex allocations" and "SO Tax Pools

 $<sup>^{16}</sup>$  This variable value relates to a licensee's regulatory opening tax losses and not statutory tax losses per corporation tax returns.

	Totex allocations" sheets of the GT2 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 billed basis	This variable value should be provided by licensees. This value should be Recovered Revenue as defined below, but inclusive of Bad
	Debt.
TO:  Bad Debt  SO:	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.
• SO Bad Debt	Values should be input into the yellow input cells of the bad debt section of the "4.16 – TO Recovered Revenue" and "4.17 – SO Recovered Revenue" sheets. This data is then picked up in the TO and SO PCFM Input Summary sheets, which should be used to populate the PCFM.
	The provisional Bad Debt cost should include the Bad Debt costs that the licensee expects to incur including any RIIO-GT1 Bad Debt and 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 RIIO-
	GT1 Bad Debt and COVID-19 Bad Debt), where
	the costs have previously been recovered via the
	BDA term. <sup>17</sup>
	All values should be exclusive of VAT.
Recovered Revenue	This variable value <u>ias</u> defined in SpC 2.1, Part B
	of GT Licen <u>c</u> se <u>and</u> should be provided by
	licensees-and input directly into company specific
	input sheets of the GT2 PCFM.
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.

<sup>&</sup>lt;sup>17</sup> For the System Operator, all references to Bad Debt, COVID-19 Bad Debt and RIIO-GT1 Bad Debt should be read as SO Bad Debt, SO COVID-19 Bad Debt and RIIO-GT1 SO Bad Debt respectively.

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	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 VolumesGT2 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>18</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 VolumeGT2 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 (by TO and GSO). 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.

<sup>&</sup>lt;sup>18</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.