

To:
Cadent Gas Limited
Northern Gas Networks Limited
Scotland Gas Networks plc
Southern Gas Networks plc
Wales and West Utilities Limited
National Grid Gas Plc

Gas Act 1986 Section 23(2)

Notice of statutory consultation on a proposal to modify the special conditions of the Gas Transporter licence held by the licensees listed above

- 1. The Gas and Electricity Markets Authority ('the Authority')¹ proposes to modify the special conditions of the Gas Transporter licence held by each of the licenses listed above("the licensees") granted or treated as granted under section 7 of the Gas Act 1986 by:
 - removing the Bad Debt pass-through term from Special Condition 6.1 (Pass-through items);
 - making amendments to Part B of Special Condition 1.1 (Interpretation and definitions), Part B of Special Condition 2.1 (Revenue restriction) and Part A of Special Condition 6.1.
 - removing the SO Bad Debt pass-through term from Special Condition 6.3 (System operator pass-through items) of National Grid Gas Plc's licence; and
 - making amendments to Part B of Special Condition 1.1 (Interpretation and definitions) and Part B of Special Condition 2.3 (System operator revenue restriction)

Appendix 3 contains the proposed modifications to the special condition of the Gas Transporter licence held by National Grid Gas Plc. Appendix 4 contains the proposed modifications to the special conditions of the Gas Transporter Licence held by Cadent Gas Limited, Northern Gas Networks Limited, Southern Gas Networks plc, Scotland Gas Networks plc, and Wales and West Utilities Limited.

- 2. The reason for these proposed modifications is to ensure that we record Recovered Revenue on a cash basis, as opposed to the current practice, which records the licensee's Recovered Revenue as billed. This means that the current value of Recovered Revenue reflects the total amount a licensee bills its customers but not necessarily the true amount that it collects, for instance due to unrecoverable Bad Debt. Instead of excluding Bad Debt from Recovered Revenue, we currently reflect it as a pass-through term.
- 3. We believe that this current practice is unclear and could be misleading as the Recovered Revenue value does not reflect the revenue actually recovered by a licensee.
- 4. The effect of these proposed modifications is to remove the Bad Debt term from the pass-through condition and instead, to require licensees to record Recovered Reveue on a cash basis ie. net of any Bad Debt. The non-recovered Bad Debt

¹ The terms "the Authority", "we" and "us" are used interchangeably in this document.

amount will then be reflected as an under-recovery, which will be adjusted through the K correction factor. We propose to also include inputs for Recovered Revenue on a billed basis, Bad Debt and Recovered Revenue in our Regulatory reporting templates to ensure that we continue to have sight of the Bad Debt values and to set out more clearly, the interplay between Recovered Revenue and Bad Debt.

- 5. We are also proposing modifications to the gas distribution licensee's licences to remove the definition 'Non-Traded Central Carbon Price' and replace it with a new definition 'Central Price of Carbon'. The reason for this modification is because the current definition refers to publication of a value for non-traded carbon emissions by the Department for Business, Energy and Industrial Strategy (BEIS). However, last autumn BEIS stopped publishing separate traded and non-traded carbon prices and now publishes a single carbon price. The effect of the modification is to to use the single carbon price published by BEIS in the calculation of the Shrinkage Management output delivery incentive term in Special Condition 4.4 (Shrinkage Management output delivery incentive).
- 6. In addition, we are also proposing modifications to the GD2 and GT2 Price Control Financial Instruments (PCFIs).
- 7. The reasons for the proposed modifications, and an overview of the proposed modifications being made to both the GD2 and GT2 Price Control Financial Models (PCFM) are set out below:
 - a. the introduction of the super-deduction legislation results in companies investing in qualifying new plant and machinery assets being able to claim accelerated capital allowances on qualifying plant and machinery investments and special rate assets in FY22 and FY23. The general and special rate tax pool opening balances in the PCFM require adjusting to reflect the impact of the super deduction regime. We have added rows in the input sheets to enable opening balance adjustments for these general and special rate tax pools;
 - b. to allow for the impact of the super deduction tax regime to be reflected we have updated the tax paid calculation within the 'Finance&Tax' sheet;
 - c. we have updated names of variable values throughout the PCFM as per the latest published licence conditions; and
 - d. further to the Bad Debt licence modification set out above, we have moved the Bad Debt variable value out of the pass-through section of the input sheet and now include this row further down in the sheet to net this off against Billed Recovered Revenue to derive Recovered Revenue on a cash basis.
- 8. There are some proposed modifications that relate to the GD2 PCFM only. The reasons for and overviews of the proposed modifications are set out below:
 - e. we have included some further calculations on the AR sheet to split Allowed Revenue into the three sub-components that gas distribution licensees need to input into their charging model. This was previously done offline and so licensees requested that we include the calculation in the PCFM to

- automate this process. This split is for presentational purposes only and has no impact on the calculation of Allowed Revenue.
- f. We have amended subscripts to 't' in the 'Term' column in the 'ReturnAdi' sheet. This was incorrectly subscripted as 'j'.
- 9. There are some proposed modifications that relate to the GT2 PCFM only. The reasons for and overviews of the proposed modifications are set out below:
 - q. we have removed the Opex Escalator term from the calculation of SO Allowed Revenue to align this with the latest published licence.
 - h. we have consolidated the Directly Remunerated Services rows to 'Directly remunerated services revenue' and 'Directly remunerated services cost' as the previous split was not relevant to Gas Transmission.
- 10. We also propose to make some consequential modifications to the GD2 and GT2 Price Control Financial Handbooks ("Handbook") for completeness and consistency with the PCFM. Please see Appendix 2 to this notice for a list of the proposed Handbook modifications.
- 11. The reason for and effect of these proposed modifications to the PCFIs will be to align the PCFIs with the special licence conditions.
- 12. A copy of the proposed modifications and other documents referred to in this Notice have been published on our website (<u>www.ofgem.gov.uk</u>). Alternatively they are available from foi@ofgem.gov.uk. Appendices 1 and 2 indicate the location of changes within the published PCFI.
- 13. Any representations with respect to the proposed licence modifications must be made on or before 18 May 2022 to: Michael Smith, Office of Gas and Electricity Markets, 10 South Colonnade, Canary Wharf, London, E14 4PU or by email to Michael.Smith@Ofgem.gov.uk
- 14. We normally publish all responses on our website. However, if you do not wish your response to be made public then please clearly mark it as not for publication. We prefer to receive responses in an electronic form so they can be placed easily on our website.
- 15. If we decide to make the proposed modifications they will take effect not less than 56 days after the decision is published.

Jonathan Gorrie Chief Financial Advisor, Analysis and Assurance Duly authorised on behalf of the Gas and Electricity Markets Authority 20 April 2022

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Appendix 1 – Location of modifications within the Price Control Financial Model

Sector	Nature of Modification	Sheet	Cell reference
		reference	
GT2	The general and special rate tax pool opening balances require adjusting to reflect the impact of the super deduction regime. On the licensee-specific input sheets, we have added blue box rows in the input sheets to enable opening balance adjustments for these	NGGT TO	E131, G131, H131, AP131:AT131, E132, G132, H132, AP132:AT132
	general and special rate tax pools. These rows are 'General Pool Opening Balance Adjustment' and 'Special Rate Pool Opening Balance Adjustment'.	NGGT SO	E83, G83, H83, AP83:AT83, E84, G84, H84, AP84:AT84
	The cell colour signifies that these cells will become PCFM Variable Values that can therefore be updated as part of the Annual Iternation Process. The equivalent cells have been highlighted light green on the Input sheet, which signifies the same thing but uses a different colour scheme.	System Operator	E156, G156, H156, AP156:AT156, E157, G157, H157, AP157:AT157, AP336:AT336, AP347:AT347
		Input	
	These new rows have been linked to the 'Revisions' rows within the 'TaxPools' sheet under General and Special pools.		E204, G204, H204, AP204:AT204, E205, G205, H205, AP205:AT205
		TaxPools	AP52:AT52, AP64:AT64
GT2	To allow for the impact of the super deduction tax regime to be reflected we have updated the tax paid calculation within the 'Finance&Tax' sheet. We have added 'Contributions to losses from	Finance&Tax	E270, G270, AP270:AT270, E271, G271, AP271:AT271, AP272:AT272
	clawback' and 'Adjustments to losses from tax trigger' in the tax paid calculation. We have updated the formula in the 'profits reduced by tax losses' row to account for these new rows	System Operator	E527, G527, AP527:AT527, E528, G528, AP528:AT528, AP529:AT529

GT2	On the licensee-specific input we have	NGGT TO	E28, E29, H35,
GIZ	updated names of variable values throughout per the latest published special licence	NGG1 10	E45, E46
	conditions.	NGGT SO	E17, E18, H22, E24, E25
GT2	Further to the Bad Debt licence modification	NGGT TO	E159:H159,
UIZ	discussed in this notice we have moved the Bad Debt variable value out of the pass-through section of the licensee input sheet and now include this row further down in the sheet.	NGGI 10	E160:H160, AO160:AT160, E161:H161, AO161:AT161
	We have updated the term that was previously 'recovered revenue' to 'recovered revenue billed basis'. We have then included an additional row which is called 'Recovered Revenue' which is the 'Recovered revenue	NGGT SO	E111:H111, E112:H112, AO112:AT112, E113:H113, AO113:AT113
	billed basis' net of the bad debt. The equivalent cells have added as light green on the Input sheet.	Input	E236:H236, E237:H237, A0237:AT237, E238:H238, A0238:AT238
		System Operator	E188:H188, E189:H189, AO189:AT189, E190:H190, AO190:AT190
GT2	We have removed the Opex Escalator term as per the latest published licence.	NGGT SO	
GT2	We have consolidated the Directly Remunerated Services rows to 'DRS revenue and costs' as the previous split was not relevant to Gas Transmission. We have replaced the Directly Remunerated Services rows, to 'DRS revenue' and 'DRS	NGGT TO	E115, G115, H115, AP115:AT115, E116, G116, H116, AP116:AT116
	cost' on the licensee input sheet and have made the equivalent addition to the Input sheet.	Input	E128, G128, H128, AP128:AT128, E129, G129, H129, AP129:AT129

GD2	The general and special rate tax pool opening balances require adjusting to reflect the impact of the super deduction regime. On the licensee-specific input sheets, we have added blue box rows in the input sheets to enable opening balance adjustments for these general and special rate tax pools. These rows are 'General Pool Opening Balance Adjustment' and 'Special Rate Pool Opening Balance Adjustment'. The cell colour signifies that these cells will become PCFM Variable Values that can therefore be updated as part of the Annual Iternation Process. The equivalent cells have been highlighted light green on the Input sheet, which signifies the same thing but uses a different colour scheme. These new rows have been linked to the 'Revisions' rows within the 'TaxPools' sheet under General and Special pools	GDN input sheets Input TaxPools	E149, G149, H149, AP149:AT149, E150, G150, H150, AP150:AT150 E225, G225, H225, AP225:AT225, E226, G226, H226, AP226:AT226 AP50:AT50, AP61:AT61
GD2	To allow for the impact of the super deduction tax regime to be reflected we have updated the tax paid calculation within the 'Finance&Tax' sheet. We have added 'Contributions to losses from clawback' and 'Adjustments to losses from tax trigger' in the tax paid calculation. We have updated the formula in the 'profits reduced by tax losses' row to account for these new rows On the licensee-specific input we have	Finance&Tax	E237, G237, AP237:AT237, E238, G238, AP238:AT238, AP239:AT239
GD2	updated names of variable values throughout as per the latest published special licence conditions. Further to the Bad Debt licence modification discussed in this notice we have moved the	GDN input sheets GDN input sheets	E29, E30, H51, E53, E54 E179:H179, E180:H180,

	Bad Debt variable value out of the pass-		AO180:AT180,
	through section of the licensee input sheet and now include this row further down in the sheet.		E181:H181, AO181:AT181
	We have updated the term that was previously 'recovered revenue' to 'recovered revenue billed basis'. We have then included an additional row which is called 'Recovered Revenue' which is the 'Recovered revenue billed basis' net of the bad debt.	Input	E259:H259, E260:H260, AO260:AT260, E261:H261, AO261:AT261
	The equivalent cells have added as light green on the Input sheet.	AR	AO18:AT18
GD2	We have introduced a split of the Allowed Revenue into three separate components at the request of GDNs to ensure their methodology for this process is consistent and automated. This is for presentational purposes only and has no impact on Allowed Revenue. To achieve this, we have added 'RIIO- 1 Exit allowed revenue', 'RIIO-1 SOLR allowed revenue', 'Exit Recovered revenue', 'SOLR Recovered revenue' and 'Legacy SOLR' to the licensee input sheet. We have made the equivalent updates to the Input sheet. We have emulated the main Allowed Revenue calculation within the 'AR sheet' for the individual components of Exit Allowed Revenue, SOLR Allowed Revenue and LDZ Allowed Revenue. To facilitate the calculations we have added rows in LiveResults to capture Exit and SOLR calculated revenue and their adjustment terms. We have made the equivalent changes to the SavedResults sheet.	GDN input sheets Input	E127:H127, AP127, E177:H177, AO177, E178:H178, AO178, E182:H182, AO182:AT182, E183:H183, AO183:AT183 E137:H137, AP137:AT137, E257:H257, AO257, E258:H258, AO258, E262:H262, AO262:AT262, E263:H263, AO263:AT183
		AR	Rows 50:125
		LiveResults	Rows 165:195
		SavedResults	Rows 165:195, 344:375, 524:555, 704:735, 884:915, 1064:1095,

			1244:1275, 1424:1455
GD2	We have amended subscripts to 't' in the 'Term' column in the 'ReturnAdj' sheet. This was incorrectly subscripted as 'j'.	ReturnAdj	H21, H23, H81, H82

Appendix 2 – Location of modifications within the Price Control Financial Handbook

Sector	Nature of Modification	Page number
GT2	General updates and tidying up	1, 18
GT2	Variable Value table 3.1 and 3.2 updated per PCFM Modifications described above.	25, 26 and 32
GT2	Bad Debt definitions previously in licence have now been included in the Glossary	86
GD2	General updates and tidying up	1, 18, 80
GD2	Variable Value table 3.1 updated per PCFM Modifications described above.	27, 30, 31, 32, 33
GD2	Bad Debt definitions previously in licence have now been included in the Glossary	82

Appendix 3: Proposed National Grid Gas licence modifications to Special Condition 6.1 (Pass-through items), Special Condition 6.3 (System operator pass-through items, Part B of Special Condition 1.1 (Interpretation and definitions), Part B of Special Condition 2.1 (Revenue restriction) and Part B of Special Condition 2.3 (System operator revenue restriction). (Deletions are shown in strike through and new text is double underlined)

Special Condition 1.1 Interpretation and definitions

COVID-19 Defaulting Gas Shipper	means a Gas Shipper who participated in the COVID-19 Scheme and whose insolvency has resulted in the licensee incurring Bad Debt or SO Bad Debt. The timing and meaning of insolvency is as per the Insolvency Act 1986.
COVID-19 Scheme	means the COVID-19 Liquidity Relief Scheme for Shippers as established by the Uniform Network Code (UNC) modification 726: "COVID-19 Liquidity relief scheme for Shippers".
COVID-19 System Operator Bad Debt	means SO Bad Debt owed to the licensee by one or more COVID-19 Defaulting Gas Shippers.
COVID-19 Transportation Owner Bad Debt	means Bad Debt owed to the licensee by one or more COVID-19 Defaulting Gas Shippers.
Defaulting Gas Shippers	means a Gas Shipper, which has failed to make payments to the licensee in accordance with the Uniform Network Code.
RIIO-GT1 Bad Debt	means the Bad Debt incurred during RHO-GT1.
RIIO-GT1 SO Bad Debt	means the SO Bad Debt incurred during RIIO-GT1.

Special Condition 2.1 Transportation owner revenue restriction (ARt)

Part B: Formula for calculating the TO Recovered Revenue term (RRt)

2.1.4 The value of RR_t is derived in accordance with the following formula, net of Bad Debt:

$$RR_t = TOREntC_t + TORExC_t + TORCOM_t$$

where:

 $TOREntC_t$ means the amount of revenue in respect of NTS Transportation Owner Activity that results from the sale of the following types of Entry Capacity:

- (a) Interruptible Entry Capacity;
- (b) Non-Incremental Obligated Entry Capacity; and
- (c) Funded Incremental Obligated Entry Capacity;

 $TORExC_t$ means the amount of revenue in respect of NTS Transportation Owner Activity that results from the sale of the following types of Exit Capacity:

- (a) Off-Peak Exit Capacity;
- (b) Non-Incremental Obligated Exit Capacity; and
- (c) Funded Incremental Obligated Exit Capacity; and

 $TORCOM_t$ means the amount of revenue in respect of NTS Transportation Owner Activity that results from:

- (a) charges levied by the licensee on Gas Shippers and DN Operators pursuant to Standard Special Condition A4 (Charging General); and
- (a) payments made by the licensee to Gas Shippers and DN Operators other than revenue earned by the licensee through $TOREntC_t$ and $TORExC_t$.

Special Condition 2.3 System operator revenue restriction (SOAR_t)

Part B: Formula for calculating the SO Recovered Revenue term (SORRt)

2.3.4 The value of SORR_t is derived in accordance with the following formula<u>, net</u> of SO Bad Debt:

$$SORR_t = SOREntC_t + SORExC_t + RCOM_t + SOROC_t$$

where:

SOREntC_t means the amount of revenue in respect of NTS System Operation Activity that results from the sale of Non-Obligated Entry Capacity;

 $SORExC_t$ means the amount of revenue in respect of NTS System Operation Activity that results from the sale of Non-Obligated Exit Capacity;

RCOMt means the amount of revenue in respect of NTS System Operation
 Activity that results from charges levied by the licensee on Gas
 Shippers and DN Operators pursuant to Standard Special Condition A4
 (Charging – General) in respect of NTS System Operation Activity. This will include revenue from charges to recover costs incurred by the licensee and net payments made to or by the licensee in respect of reducing the costs arising from NTS System Operation Activity other than revenue earned by the licensee through:

- (a) SOREntCt;
- (b) SORExCt;
- (c) SOROCt; and
- (d) revenues received by the licensee from the sale of gas purchased by the licensee in respect of its use of Constrained Storage Facilities in order to avoid Transportation Constraints; and

 $SOROC_t$ means the amount of revenue derived by the licensee through associated NTS System Operation Charges and is derived in accordance with the following formula:

$$SOROC_t = RNC_t + RCOR_t + FTI_t + RLOC_t + RADD_t$$

where:

 RNC_t means net revenue derived by the licensee from Balancing Neutrality Charges;

 $RCOR_t$ means the revenue derived by the licensee from System Entry Overrun Charges;

 FTI_t means the revenue derived by the licensee from charges levied on Gas Shippers and DN Operators in respect of any Failure To Interrupt;

RLOC_t means the revenue derived by the licensee from Locational Sell Actions and Physical Renomination Incentive Charges; and

 $RADD_t$ has the meaning given in paragraph 5.5.5 of Special Condition 5.5 (Entry Capacity and Exit Capacity Constraint Management).

Special Condition 6.1 Transportation owner pass-through items (PT_t)

Part A: Formula for calculating the transportation owner allowed pass-through term (PTt)

6.1.3 The value of PT_t is derived in accordance with the following formula:

$$PT_t = RB_t + LF_t + EDE_t + BD_{\varepsilon} + OPTC_t + IS_t + PTV_t + Hy_t + NZPS_t$$

where:

 RB_t means the amount levied on the licensee in respect of the Prescribed Rates or an amount directed under Part B;

 LF_t means the net payments made by the licensee in respect of the NTS Transportation Owner Activity under Standard Condition 3 (Payments by the Licensee to the Authority);

means the payments in relation to the Pension Scheme Established Deficit repair expenditure for each Regulatory Year that relate to NTS
 Transportation Owner Activity, as further explained and elaborated upon in the GT2 Price Control Financial Handbook;

BD_t is derived in accordance with Part C:

 OPTC_t means the payments made by the licensee to the Secretary of State in respect of Policing Costs;

is derived in accordance with paragraph 6.2.3 of Special Condition 6.2(Gas conveyed to Independent Systems);

 PTV_t means the PARCA Termination Value and has the value zero unless directed in accordance with Part D;

 Hy_t is derived in accordance with Part E; and

*NZPS*_t is derived in accordance with Part F.

Part C: Formula for calculating the Bad Debt term (BDt) Not Used

6.1.7—The value of BD_t is derived in accordance with the following formula:

$$BD_{\pm} = BDA_{\pm} - RBD_{\pm}$$

----where:

BDA_t means the aggregate value of Bad Debt the licensee has incurred or expects to incur, inclusive of RIIO-GT1 Bad Debt and COVID-19 Transportation Owner Bad Debt, with respect to NTS Transportation Owner Charges owed to the licensee by one or more Defaulting Gas Shippers, less the interest income accrued at the default rate set out in the Uniform Network Code net of WACC with respect to the COVID-19 Scheme; and

RBD[‡] means the aggregate value of Bad Debt previously recovered, inclusive of RIIO-GT1 Bad Debt and COVID-19 Transportation Owner Bad Debt, by the licensee via the BDA[‡] term, where the licensee has received cash through either the Defaulting Gas Shipper or been credited by the administrator or liquidator of a Defaulting Gas Shipper.

Special Condition 6.3 System operator pass-through items (SOPT_t)

Part A: Formula for calculating the system operator allowed pass-through term (SOPTt)

6.3.3 The SOPT_t term is derived in accordance with the following formula:

$$SOPT_t = CDSP_t + SOEDEt + SOBD_t$$

where:

 CDSP_t means CDSP Costs, excluding costs incurred in relation to UK Link

Gemini; <u>and</u>

 $SOEDE_t$ means the payments in relation to the Pension Scheme Established

Deficit repair expenditure that relate to NTS System Operation Activity;

and.

SOBD_₹ is derived in accordance with Part B.

Part B: Formula for calculating the System Operator Bad Debt term (SOBDt)

6.3.4—The value of SOBD_t is derived in accordance with the following formula:

$$SOBD_{t} = SOBDA_{t} - SORBD_{t}$$

SOBDA[‡] means the aggregate value of SO Bad Debt the licensee has incurred

or expects to incur, inclusive of RIIO-GT1 SO Bad Debt and COVID-19 System Operator Bad Debt, with respect to NTS System Operation Charges owed to the licensee by one or more Defaulting Gas Shippers, less the interest income accrued at the default rate set out in the Uniform Network Code net of WACC with respect to the COVID-19

Scheme; and

*SORBD*_t means the aggregate value of SO Bad Debt previously recovered,

inclusive of RIIO-GT1 SO Bad Debt and COVID-19 System Operator Bad Debt, by the licensee via the SOBDA_t term, where the licensee has been credited by the administrator or liquidator of a Defaulting Gas

Shipper.

Appendix 4 –Proposed Gas Distribution Network licence modifications to Special Condition 6.1 (Pass-through items), Part B of Special Condition 1.1 (Interpretation and definitions), Part A of Special Condition 4.4(Shrinkage Management output delivery incentive (SM_t)) and Part B of Special Condition 2.1 (Revenue restriction). (Deletions are shown in strike through and new text is double underlined)

Special Condition 1.1 Interpretation and definitions

COVID-19 Bad Debt	means Bad Debt owed to the licensee by one or more COVID- 19 Defaulting Gas Shippers.
COVID-19 Defaulting Gas Shipper	means a Gas Shipper who participated in the COVID-19 Scheme and whose insolvency has resulted in the licensee incurring Bad Debt. The timing and meaning of insolvency is as per the Insolvency Act 1986.
COVID-19 Scheme	means the COVID-19 Liquidity Relief Scheme for Shippers as established by the Uniform Network Code (UNC) modification 726: `COVID-19 Liquidity relief scheme for Shippers'.
Defaulting Gas Shippers	means a Gas Shipper, which has failed to make payments to the licensee in accordance with the Uniform Network Code.
Non-traded Central Price of Carbon	means the non-traded price of carbon, which reflects the value of non-traded carbon emissions (emissions not traded through the EU-ETS scheme)current carbon value (Central Series) that is published by the Department for Business, Energy and Industrial Strategy (or any other government department from time to time).

Special Condition 2.1 Revenue restriction (ARt)

Part B: Recovered Revenue term (RRt)

2.1.4 Recovered revenue (RRt) means the revenue derived by the licensee, net of Bad Debt, from the Supply Of Distribution Network Services to Gas Shippers, in respect of its Licensed Activity and means the undertaking and performance for gain or reward of engagements:

- (a) in connection with the conveyance of gas through the Transportation System;
- (b) for the prevention of the escape of gas which has been taken off the Transportation System; and
- (c) relating to the acquisition of capacity rights, gas or gas derivatives for the purpose of:
 - i. the balancing of the Transportation System through the acquisition or disposal of gas to replace gas lost from the Transportation System; and
 - ii. facilitating constraint management.

Special Condition 4.4 Shrinkage Management output delivery incentive (SMt)

Part A: Formula for calculating the Shrinkage Management incentive (SMt)

4.4.1 The value of SMt is derived in accordance with the following formula:

$$SM_t = max \left[min \left((CBV_t - AL_t + PIV_t)(GPRC_t + CC_t), 0.0025 \cdot EABR \right), -0.0025 \cdot EABR \right] \cdot TIS$$

where:

CBV_t means the Gas Conditioning Baseline Volume;

ALt means the Actual Leakage Volume;

EABR means Ex-Ante Base Revenue;

PIV_t means the Pressure Impact Volume, derived in accordance with

paragraph 4.4.5;

GPRCt is derived in accordance with Part B;

CCt means the Non Traded Central Carbon Price of Carbon, multiplied by a

GWh conversion factor of 1,226.42; and

TIS means the Totex Incentive Strength.

Special Condition 6.1 Pass-through items (PTt)

Part A: Formula for calculating the allowed pass-through term (PTt)

6.1.3 The PT_t term is derived in accordance with the following formula:

 $PT_t = RB_t + LF_t + PD_t + EDE_t + TPWI_t + TG_t + MP_t + CDSP_t + SL_t + EC_t + BD_{\overline{\epsilon}}$ where:

 RB_t means the amount levied on the licensee in respect of the Prescribed Rates or an amount directed under Part B;

LF_t means the net payments made by the licensee in respect of Licensed Activity under Standard Condition 3 (Payments by the Licensee to the Authority);

 PD_t means the payments made by the licensee to meet the Distribution Network Pension Deficit Charge, which is levied on the Distribution Network by the NTS Operator;

means the payments in relation to the Pension Scheme Established Deficit repair expenditure for each Regulatory Year, as further explained and elaborated upon in the GD2 Price Control Financial Handbook;

 $TPWI_t$ means the Third Party Damage And Water Ingress Costs pass-through term and is derived in accordance with Part C;

means the adjustment equal to any allowance made, in total, for reasonable costs incurred by a gas supplier pursuant to paragraphs 5, 6 and 13 of Standard Condition 7 (Provision of Information Relating to Gas Illegally Taken);

MPt means the adjustment equal to miscellaneous pass-through costs incurred by the licensee and not reflected in any other part of this condition, which the Authority has (following consultation with the licensee) directed the licensee to treat as part of MPt;

 $CDSP_t$ means CDSP Costs;

 SL_t means the Shrinkage costs pass-through term and is derived in accordance with Part D; and

 EC_t means the sum of NTS Exit Flat Capacity Costs and NTS Exit Flex Capacity Costs; and.

BD_t means the Bad Debt term and is derived in accordance with Part E.

Part D: Formula for calculating the Bad Debt term (BDt)

6.1.12 The value of the BD_t-term is derived in accordance with the following formula:

$$BD_{\xi} = BDA_{\xi} - RBD_{\xi}$$

-----where:

BDA_±

means the aggregate value of Bad Debt the licensee has incurred or expects to incur, inclusive of COVID-19 Bad Debt, with respect to Network Charges owed to the licensee by one or more Defaulting Gas Shippers, less the interest income accrued at the default rate set out in the Uniform Network Code net of WACC with respect to the COVID-19 Scheme; and

means the aggregate value of Bad Debt previously recovered, inclusive of COVID-19 Bad Debt, by the licensee via the BDA_t term, where the licensee has received cash through either the Defaulting Gas Shipper or been credited by the administrator or liquidator of a Defaulting Gas Shipper.