

# Consultation

RIIO-GD1 Close out: Consultation on proposed adjustments			
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The previous gas distribution price control (RIIO-GD1) ended on 31 March 2021. It had several elements which could not be settled until the price control had ended. We have now assessed company performance for these areas and have come to a view on whether we will be making any revenue adjustments.

We are consulting on our view under each of the RIIO-GD1 Close out mechanisms for each of the Gas Distribution Network operator (GDN) licensees. We would like views from people with an interest in gas distribution. We would also welcome responses from other stakeholders and the public.

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## Executive Summary

The previous gas distribution price control (RIIO-GD1) ended on 31 March 2021.

RIIO-GD1 made provision in relation to several areas which, due to their uncertain nature, could only be settled once all costs and RIIO-GD1 performance was known. This means that certain elements of the price control need to be subject to “closeout” once the price control has ended.

**To closeout the RIIO-GD1 price control, the following areas will be addressed in this document:**

- Iron mains risk reduction programme (IMRRP)
- Fuel Poor Network Extension Scheme (FPNES)
- Reliability (Interruptions)
- Shrinkage and Environmental Emissions Incentives

We have assessed GDN’s performance against these areas and have come to a minded-to position on proposed adjustments. We now seek stakeholder opinion on the results of the assessment.

### Summary of our assessment

The result of our assessment of company performance under each mechanism is explained in more detail in chapters 2 to 5. In summary our view is that:

**Overall, we are proposing total revenue adjustments of (-£22.62m) (09/10 prices) against RIIO-GD1 allowances across all mechanisms and all licensees, as detailed in the table below. All adjustments will be made through the RIIO-GD2 revenues.**

**Table 1: RIIO-GD1 Closeout – total revenue adjustments (£m, 2009/10 prices)**

Area	Value of adjustment across all licensees (£m)
Iron mains risk reduction	0
FPNES	(-2.51)
Reliability (Interruptions)	N/A (Reputational only)

Shrinkage and Environmental Incentives	(-20.1)
Total value of adjustment	<b>(-22.62)</b>

## Next Steps

We are inviting responses to this consultation following the **Decision on the closeout methodologies for RIIO-GD1**<sup>1</sup>. Please provide responses on the proposed adjustment figures detailed in this document. Contact and deadline details are on page 1. After we have considered consultation responses, we will publish our decision by Autumn of 2023.

We will give licensees 28 days' notice of any associated revenue adjustments. Revenue adjustments will be calculated in line with the methodology set out in the Price Control Financial Handbook (PCFH). These revenue adjustments will be used in the calculation of revised allowed revenues as part of the Annual Iteration Process (AIP).

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<sup>1</sup> [Decision on the closeout methodologies for RIIO-GD1 | Ofgem](#)

## 1. Introduction

### Gas Distribution

- 1.1 The 8 GDN licensees are below together with the companies that manage them (the Gas Distribution Network group).

**Table 1.1:** GDN ownership and names

GDN	Licensee	
Cadent	EoE	East of England
	Lon	London
	NW	North West
	WM	West Midland
NGN		Northern Gas Network
SGN	Sc	Scotland
	So	Southern
WWU		Wales and West Utilities

### Background

- 1.2 The previous gas distribution price control (RIIO-GD1) ran from 2013 to 2021. The price control set outputs relating to network investment that GDNs were to deliver, and revenues they were allowed to collect from customers.
- 1.3 Within RIIO-GD1 there were several areas of expenditure that required information about actual efficient costs incurred, revenue received and the extent to which outputs were delivered before RIIO-GD1 can be closed out. These are compared with the costs, revenues etc. that were assumed in RIIO-GD1 Final Proposals ("Final Proposals") to the value of any adjustment required at closeout.
- 1.4 We have not included closeout of the Network Output Measures (NOMs), Capacity Utilisation or Disposals in this consultation. We are consulting on our approach to NOMs separately due to their cross-sector scope and Capacity Utilisation is accounted for within the NOMs closeout assessment. Similarly, Disposals will also be consulted on separately due to the detailed nature of the assessment. We are of the view it is appropriate to consider whether there is a need to carry out a review that the reported cash proceeds for disposals reflect a fair arm's length market value.

- 1.5 A separate decision on the WWU Tax clawback referenced in the GD Closeout Methodologies Decision can be found on our website<sup>2</sup>.
- 1.6 In line with the decision on the RIIO-GD1 Closeout methodologies, below we summarise how each area will be assessed:
- **Iron mains risk reduction programme:** As stipulated in the licence, a sharing mechanism is used to address any over or underspend in allowances. The over or underspend will be treated as Totex and subjected to the RIIO GD1 Totex Incentive Mechanism (TIM) sharing factor.
  - **Fuel Poor Network Extension Scheme (FPNES):** An adjustment to allowances to account for over and under delivery is required. Additionally, in accordance with the licence, a reward or penalty is implemented to motivate network companies to achieve their targets. A 2.5% penalty or reward is assigned based on their performance in meeting these objectives.
  - **Reliability (Interruptions):** An evaluation of the number and duration of customer interruptions against agreed targets for the price control period. GDNs must explain any under performance against this output.
  - **Shrinkage and Environmental Emissions Incentive:** Incentives to reduce gas transport losses and network emissions, based on over or underperformance against performance targets. We have decided to close out the Shrinkage and Environmental Emissions Incentives in line with the methodologies set out in Special Conditions 7.11 and 7.12 of the GD2 Licence.
- 1.7 At RIIO-GD2 Final Determinations, we stated that we would work with stakeholders to develop methodologies to closeout these areas. In October 2022, we modified the RIIO GD2 Price Control Financial Handbook ("the PCFH Handbook") to incorporate our decision on the closeout methodologies for RIIO GD1. The methodologies, associated decision documents, consultations and responses are all on our website<sup>3</sup>.
- 1.8 The companies provided us with the data for our assessment. We carried out our assessment of GDNs performance in line with the process and methodologies set

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<sup>2</sup> [Decision on the closeout of the RIIO-GD1 Tax clawback for WWU | Ofgem](#)

<sup>3</sup> <https://www.ofgem.gov.uk/master-publications-library>

out in the Handbook. We have also consulted bilaterally on our view. We are now seeking views on the results of our assessment.

## Other Considerations

- 1.9 We will consult on amendments to the Price Control Financial Model (PCFM) and final revenue adjustments ahead of the Annual Iteration Process (AIP) and will engage with GDNs to implement the detail of these adjustments.

## Structure of this document

- 1.10 Each chapter of the document covers a different area of the RIIO GD1 price control where a closeout funding provision was required.
- 1.11 In each section there is a summary of each closeout area, details of the assessment process and the resultant actions/adjustment.

## Context and related publications

Consultation on the methodologies to closeout RIIO-GD1

<https://www.ofgem.gov.uk/publications/consultation-closeout-methodologies-riio-gd1>

Decision on the methodologies to closeout RIIO-GD1

<https://www.ofgem.gov.uk/publications/decision-closeout-methodologies-riio-gd1>

RIIO-GD1 Strategy Decision

<https://www.ofgem.gov.uk/publications/decision-strategy-next-gas-distribution-price-control-riio-gd1>

RIIO-GD1 Final Proposals

<https://www.ofgem.gov.uk/publications/riio-gd1-final-proposals-overview>

Supplementary documents to the RIIO-GD1 Final Proposals

[https://www.ofgem.gov.uk/sites/default/files/docs/2012/12/3\\_riiogd1\\_fp\\_finance\\_and\\_uncertainty\\_0.pdf](https://www.ofgem.gov.uk/sites/default/files/docs/2012/12/3_riiogd1_fp_finance_and_uncertainty_0.pdf)



[https://www.ofgem.gov.uk/sites/default/files/docs/2012/12/2\\_riiogd1\\_fp\\_outputsincentives\\_dec12\\_0.pdf](https://www.ofgem.gov.uk/sites/default/files/docs/2012/12/2_riiogd1_fp_outputsincentives_dec12_0.pdf)

Price Control Financial Handbook

<https://www.ofgem.gov.uk/publications/decision-modifications-riio-2-price-control-financial-instruments-and-licence-conditions-implement-closeout-riio-1>

RIIO-2 Final Determinations Transmission and Gas Distribution Network Companies  
[www.ofgem.gov.uk/publications/riio-2-final-determinations-transmission-and-gas-distribution-network-companies-and-electricity-system-operator](http://www.ofgem.gov.uk/publications/riio-2-final-determinations-transmission-and-gas-distribution-network-companies-and-electricity-system-operator)

## Consultation stages

Stage	Date
Consultation Open	18/09/2023
Consultation closes (awaiting decision). Deadline for responses	16/10/2023
Responses published and under review	Autumn 2023
Consultation decision/policy statement	Autumn 2023

## How to respond

- 1.12 We want to hear from anyone interested in this consultation. Please send your response to the person or team named on this document's front page.
- 1.13 We've asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.
- 1.14 We will publish non-confidential responses on our website at [www.ofgem.gov.uk/consultations](http://www.ofgem.gov.uk/consultations).

## Your response, data and confidentiality

- 1.15 You can ask us to keep your response, or parts of your response, confidential. We'll respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or

where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

- 1.16 If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we'll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.
- 1.17 If the information you give in your response contains personal data under the General Data Protection Regulation 2016/379 (GDPR) and domestic legislation on data protection, the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 1.
- 1.18 If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

## General feedback

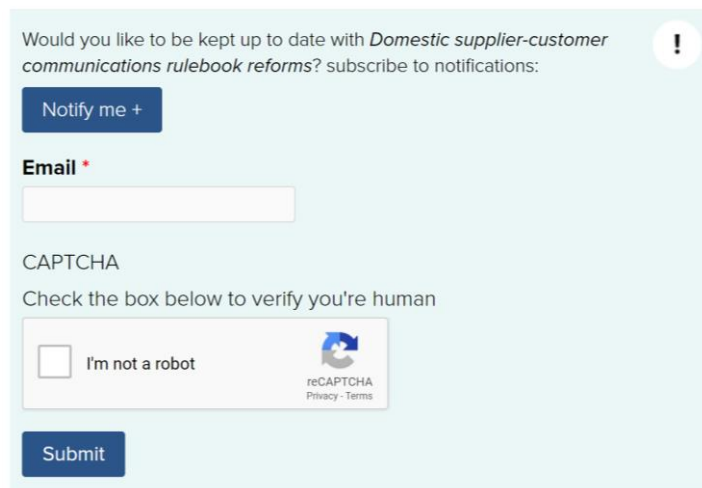
- 1.19 We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:
- Do you have any comments about the overall process of this consultation?
  - Do you have any comments about its tone and content?
  - Was it easy to read and understand? Or could it have been better written?
  - Were its conclusions balanced?
  - Did it make reasoned recommendations for improvement?
  - Any further comments?
- 1.20 Please send any general feedback comments to [stakeholders@ofgem.gov.uk](mailto:stakeholders@ofgem.gov.uk)


## How to track the progress of the consultation

You can track the progress of a consultation from upcoming to decision status using the 'notify me' function on a consultation page when published on our website.

[Ofgem.gov.uk/consultations](https://www.ofgem.gov.uk/consultations).

### Notifications




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Once subscribed to the notifications for a particular consultation, you will receive an email to notify you when it has changed status. Our consultation stages are:

- a) Upcoming
- b) Open
- c) Closed (awaiting decision)
- d) Closed (with decision)

## 2. Iron Mains Risk Reduction Programme (IMRRP)

### Summary

- 2.1 Iron mains risk reduction was one of the primary measures of the safety output category throughout RIIO-GD1. GDNs undertook the long-term programme of replacing iron mains (repex) on their networks on the basis of the Health and Safety Executive (HSE) iron mains policy.

### Closeout Assessment

- 2.2 All GDNs met/exceeded their targets for RIIO-GD1 and therefore delivered the Primary Output. We did not propose any revenue adjustment nor revision of RIIO-GD2 targets.
- 2.3 We decided<sup>4</sup> that any over or underspend against allowances will be treated as totex and subject to the RIIO-GD1 Totex Incentive Mechanism (TIM) sharing factor.
- 2.4 We have reviewed the RRP the GDNs submitted throughout the price control and have summarised company performance against their respective commitments below:

Table A2.1 IMRRP RIIO-GD1 Performance

GDN	Risk Reduction 8 Year commitment	Actual Risk Reduction Achieved (RIIO-GD1)	% of the 8 year commitment removed (RIIO-GD1)
EoE	192,567	242,767	126%
Lon	102,281	102,552	100%
NW	154,428	200,262	130%
WM	131,394	141,872	108%
NGN	111,191	219,404	197%
Sc	44,277	87,711	198%
So	137,287	204,271	149%
WWU	98,727	112,129	114%

<sup>4</sup> RIIO-GD1 Closeout decision: <https://www.ofgem.gov.uk/sites/default/files/2022-04/Decision%20on%20the%20closeout%20methodologies%20for%20RIIO-GD1.pdf>

### 3. Fuel Poor Network Extension Scheme (FPNES)

#### Summary

- 3.1 The Fuel Poor Network Extension Scheme (FPNES) is a scheme to help tackle fuel poverty by supporting off grid, fuel poor households to connect to the gas network.
- 3.2 RIIO-GD1 Final Proposals provided baseline funding for the GDNs to deliver 77,450 connections to fuel poor customers collectively. Following a review of the FPNES in 2015, the GDNs' target was increased to 91,203 connections.

#### Over-delivery

- 3.3 All over-delivery that met the criteria will be considered justified and a reward of 2.5% of the efficient costs of delivering the work will be provided. Additionally, an upward revenue adjustment will be made to account for the further work completed above the target.

#### Under-delivery

- 3.4 The penalty for under-delivery is 2.5% of avoided costs. Where a GDN has underperformed its targets, we changed the methodology that we proposed for calculation of the allowance adjustment.
- 3.5 This means that, for GDNs that had their connection targets adjusted by the 2015 FPNES Decision we used the 2015 unit cost, while for GDNs that did not have targets adjusted in 2015 we used the unit cost determined at Final Proposals.

Table A3.1 RIIO-GD1 FPNES Volumes Review

GDN	Target Volume (#s)	Actual Volume Delivered (#s)	Variance (#s)
EoE*	12046	12757	711
Lon	2880	2813	-67
NW	13330	11623	-1707
WM	8360	7482	-878
NGN*	14500	15621	1121
Sc*	17130	20847	3717
So*	10367	8929	-1438
WWU*	12590	11865	-725

\* Companies who has their fuel poor connection targets revised as part of the FPNES 2015 decision document<sup>5</sup>

Table A3.2 RIIO-GD1 FPNES Closeout Proposed Positive Adjustment

GDN	Over/Under Delivery	Efficient Over delivery (#s)	Outturn Unit Cost (£)	Reward (£m)	Allowance Adjustment (£m)
EoE	Over	711	1662.8	0.03	1.18
NGN	Over	1121	1597.0	0.04	1.79
Sc	Over	3717	1567.3	0.15	5.83*

\*SGN will not claim any allowances for over-delivery in the Scotland network<sup>6</sup> as such is excluded from adjustments total.

3.6 We decided that it was not appropriate to penalise GDNs for underperformance due to the impact of Covid-19 in the final year of the price control. We remain satisfied that GDNs would likely have met their FPNES target were it not for the impacts of Covid-19. As such, we propose that the five companies that under delivered against target are not to be penalised.

3.7 In line with the methodology decision document, an allowance adjustment is required to account for connections not delivered in RIIO-GD1. This is calculated on a unit cost basis then multiplied by the volume of under-delivery (i.e. the original allowance for London will be reduced in line with the 67 connections multiplied by the unit cost for the region.)

Table A3.3 RIIO-GD1 FPNES Closeout Proposed Negative Adjustment

GDN	Over/Under Delivery	Under Delivery (#s)	Unit Cost (£)	Allowance Adjustment (£m)
Lon	Under	-67	1,493	-0.1
NW	Under	-1707	949	-1.62
WM	Under	-878	1,355	-1.19
So	Under	-1438	1639	-2.36
WWU	Under	-725	905	-0.66

3.8 Overall, reviewing rewards and downward adjustments for all GDNs, the total allowance adjustments for FPNES is: [£0.22m + £2.97m + (-£5.92) = (-£2.51m)]

<sup>5</sup> [Fuel Poor Network Extension Scheme final decision document | Ofgem](#)

<sup>6</sup> As part of the agreement made in its Voluntary contribution in [November 2017](#)

## 4. Reliability (Interruptions)

### Summary

- 4.1 Maintaining low levels of unplanned interruptions is a key output requirement for customers. At RIIO-GD1 Final Proposals we set the GDNs target levels for both the number and duration of interruptions on the networks.
- 4.2 The output was reputational only with no provision in the licence for any reward or penalty, or upward/downward adjustment to the GDNs' revenues.
- 4.3 Therefore, any failure by any GDN to meet its RIIO-GD1 Reliability targets, we required the GDN to explain the reason for underperformance.
- 4.4 In March 2018, we amended the targets for both the number and duration of planned and unplanned interruptions.
- 4.5 In Final Proposals we stated that we would assess the GDNs' performance against the interruptions targets as part of the end of period review.

### GDN Performance over RIIO-GD1:

- 4.6 We have summarised each licensee's performance in this area over the RIIO-GD1 Price control period.

Table A4.1 RIIO-GD1 Reliability Performance Summary – Number of Interruptions

GDN	Target (no.)	Actual (no.)	Performance against Target
EoE	685,542	666,545	Green
Lon	572,519	483,374	Green
NW	567,803	542,284	Green
WM	438,332	411,275	Green
NGN	620,847	517,535	Green
Sc	285,987	232,085	Green
So	870,256	747,440	Green
WWU	541,405	402,764	Green

Red	Failing significantly short of Target
Amber	Within 10% of meeting Target
Green	Met/Exceeded Target

Table A4.2 RIIO-GD1 Reliability Performance Summary – Duration of Interruptions

GDN	Target (mins-millions of)	Actual (mins – millions of)	Performance against Target
EoE	321	268	Green
Lon	619	674	Amber
NW	233	210	Green
WM	200	179	Green
NGN	217	175	Green
Sc	142	101	Green
So	455	387	Green
WWU	137	101	Green

Red	Failing significantly short of Target
Amber	Within 10% of meeting Target
Green	Met/Exceeded Target

- 4.7 All GDNs, with the exception of Cadent’s London region, met their target for the Duration of Interruptions across the RIIO-GD1 period.
- 4.8 Cadent provided an explanation for not meeting the duration of interruptions target in London. Cadent explained that due to the density and number of multiple occupancy buildings (MOBs), this resulted in challenges such as engineering complexities; access to individual properties & delays in local authority sign off all impacted their ability to meet their target.
- 4.9 During the price control, Cadent adapted processes and procedures to help mitigate against these types of issue in future. We are satisfied with Cadent’s explanation, and the new procedures put in place to mitigate against this occurring again.



## 5. Shrinkage and Environmental Emissions Incentive

### Summary

- 5.1 Shrinkage refers to gas which is lost from the transportation network and is the dominant element of the GDNs' Business Carbon Footprint (BCF).
- 5.2 RIIO-GD1 included both a shrinkage allowance and an Environmental Emissions Incentive (EEI). These provided enhanced incentives to reduce gas transport losses and network emissions, based on over or underperformance against performance targets.
- 5.3 We decided to close out the Shrinkage and Environmental Emissions incentive schemes based on the established mechanistic formulae in the licence (Special Condition 7.10 & 7.11, respectively).
- 5.4 We are still considering the requirement to modify the RIIO-GD2 targets to give effect to the policy intent stated at Final Determinations, however we will engage on this as a separate RIIO-GD2 issue outside of RIIO-GD1 closeout.

Table A5.1 RIIO-GD1 Shrinkage and Environmental Emissions Performance Summary

GDN	Shrinkage Performance	Environmental Emissions Performance
EoE	Green	Green
Lon	Green	Green
NW	Green	Green
WM	Green	Green
NGN	Green	Green
Sc	Green	Green
So	Green	Green
WWU	Green	Green

Red	Failing significantly short of Target
Amber	Within 10% of meeting Target
Green	Met/Exceeded Target

## Closeout Assessment

- 5.5 We have decided to close out the Shrinkage and Environmental Emissions Incentives in line with the methodologies set out in Special Conditions 7.10 and 7.11 of the GD2 Licence.
- 5.6 As a result, we are not proposing any adjustments to either RIIO-GD1 targets (Option A as consulted on) or RIIO-GD2 targets (Option B as consulted on) as part of the closeout process. The RIIO-GD1 incentive schemes will therefore close out using the established mechanistic formulae in the licence.
- 5.7 Please see table 5.2 below which gives a breakdown of mechanistic adjustments, in line with the respective licences discussed above.

Table 5.2 Mechanistic adjustments to Shrinkage and EEI

GDN	Shrinkage adjustment (£m)	EEI adjustment (£m)	Net Adjustment (£m)
EoE	-8.0	6.8	-1.1
Lon	-4.3	5.4	1.0
NW	-5.4	7.3	1.9
WM	-5.0	5.3	0.4
NGN	-11.7	6.1	-5.6
Sc	-5.8	0.7	-5.1
So	-16.1	6.9	-9.2
WWU	-10.2	7.8	-2.3
Total	-66.4	46.3	-20.1

## Appendix 1

### **Personal data**

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

### **The identity of the controller and contact details of our Data Protection Officer**

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at [dpo@ofgem.gov.uk](mailto:dpo@ofgem.gov.uk)

### **Why we are collecting your personal data**

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

### **Our legal basis for processing your personal data**

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

### **With whom we will be sharing your personal data**

(Include here all organisations outside Ofgem who will be given all or some of the data. There is no need to include organisations that will only receive anonymised data. If different organisations see different set of data, then make this clear. Be as specific as possible.)

### **For how long we will keep your personal data, or criteria used to determine the retention period.**

Your personal data will be held for (be as clear as possible but allow room for changes to programmes or policy. It is acceptable to give a relative time e.g. 'six months after the project is closed')

### **Your rights**

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

### **Your personal data will not be sent overseas**

(Note that this cannot be claimed if using Survey Monkey for the consultation as their servers are in the US. In that case use "the Data you provide directly will be stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in term of data protection will not be compromised by this".

### **Your personal data will not be used for any automated decision making.**

### **Your personal data will be stored in a secure government IT system.**

(If using a third party system such as Survey Monkey to gather the data, you will need to state clearly at which point the data will be moved from there to our internal systems.)

### **More information**

For more information on how Ofgem processes your data, click on the link to our "[Ofgem privacy promise](#)".