

Consultation

RIIO-GT1 Closeout: Consultation on proposed adjustments			
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The previous gas transmission price control (RIIO-GT1) 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-GT1 Close out mechanisms for National Gas Transmission network (NGT). We would like views from people with an interest in gas transmission. We would also welcome responses from other stakeholders and the public.

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Executive Summary

The previous gas transmission price control (RIIO-GT1) ended on 31 March 2021. The RIIO-GT1 (the 'GT1 licence') made provision in relation to several areas which, due to their uncertain nature, could only be settled once all costs and RIIO-GT1 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-GT1 price control, the following areas need to be addressed:

- Pipeline diversions
- South West Quadrant
- Enhanced Physical Site Security
- Peterborough and Huntingdon compressors
- Hatton compressor

We have assessed NGT'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.

We have not included closeout of the Network Output Measures (NOMs) or Disposals in this consultation. NOMs are being consulted on separately due to the cross-sector scope. Similarly, Disposals will also be consulted on separately due to the detailed nature of the assessment. We consider 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.

Materiality threshold

We consider it appropriate that NGT is not exposed to material costs for which it has not received an allowance, and that consumers do not fund immaterial costs where there is no provision to do so.

There are two areas where a materiality threshold is relevant to determine whether the costs meet or exceed the required level. These cost areas are; Pipeline Diversions and Enhanced Physical Site Security. Where costs fall below this threshold, we decided that we would make no revenue adjustment, and that the expenditure is treated as totex and subject to the Totex Incentive Mechanism (TIM) sharing factor. Where costs fall on or above this value, we will undertake a thorough review to determine an efficient adjustment to allowances.

As stated in our RIIO-GT1 Final Proposals¹, the materiality threshold is 1 per cent of average annual forecast revenue after the application of the totex efficiency incentive rate. Therefore, the calculation of the materiality threshold can be summarised by:

Materiality Threshold = (Average Annual Base Revenue² * 1%) / 44.36% (Totex Incentive Rate)

This gives a materiality threshold for NGT of: £13.4m (09/10 prices)

Summary of our assessment

The result of our assessment of NGT under each mechanism is explained in more detail in chapter 2 to 6. In summary our view is that:

Overall, we are proposing total adjustments of (-£36.6m) (09/10 prices) against RIIO-GT1 allowances across all mechanisms and all licensees, as detailed in the table below. All adjustments will be made through the RIIO-GT2 revenues.

Table 1: RIIO-GT1 Closeout – total adjustments (£m, 2009/10 prices)

Area	Value of adjustment (£m)
Pipeline diversions	N/A – did not meet materiality threshold
South West Quadrant	(-40.7)
Enhanced Physical Site Security	N/A – did not meet materiality threshold
Peterborough and Huntingdon compressors	N/A
Hatton compressor	4.1*
Total value of adjustment	(-36.6)

¹ RIIO-GT1 Final Proposals, Overview: [RIIO-T1: Final Proposals for National Grid Electricity Transmission and National Grid Gas – Overview | Ofgem](#)

² RIIO-GT1 Final Proposals, Overview (section 4.48)

***This value has been converted from 2018/19 price base (price based used for RIIO GT2 Allowance setting) to 2009/10 price base in line with RIIO GT1 Allowance setting.**

Next Steps

We are inviting responses to this consultation following the **Decision on the closeout methodologies for RIIO-GT1**³. 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 in Autumn 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).

³ [Decision on the methodologies to closeout RIIO-GT1 | Ofgem](#)

1. Introduction

Gas Transmission

- 1.1 National Gas Transmission is the sole owner and operator of the gas National Transmission System (NTS) in Great Britain. Their operation is split between the transmission owner (TO) and system operator (SO). The TO has responsibility for ensuring the reliable and secure delivery of gas across Great Britain. The SO has overall responsibility for ensuring that the supply and demand of gas are balanced within NTS.

Background

- 1.2 The previous gas transmission price control (RIIO-GT1) ran from 2013 to 2021. The price control set outputs that NGT must deliver, and revenues they are allowed to collect from customers.
- 1.3 Within RIIO-GT1 there are several areas of expenditure that require information about actual efficient costs incurred, revenue received and the extent to which outputs have been delivered before RIIO-GT1 can be fully closed out. These are compared with the costs, revenues etc. that were assumed in RIIO-GT1 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) in this consultation as NOMs are being consulted on separately due to the cross-sector scope.
- 1.5 In line with the decision on the RIIO-GT1 Closeout methodologies, below we summarise how each area will be assessed:
- **Pipeline diversions:** An assessment is carried out to determine whether costs exceed the materiality threshold. If costs are material, an upward revenue adjustment is required to true-up all efficiently incurred costs. If costs are immaterial, we will make no revenue adjustment, and expenditure will be treated as totex and subject to the Tote Incentive Mechanism (TIM).
 - **South West Quadrant:** We consider that it is not appropriate for consumers to incur costs where a project was cancelled. NGT has agreed to repay all allowances and any unearned RAV returns in relation to this project.

- **Enhanced Physical Site Security:** An assessment is carried out to determine whether costs exceed the materiality threshold. If costs are material, an upward revenue adjustment is required to true-up all efficiently incurred costs. If costs are immaterial, we will make no revenue adjustment, and expenditure will be treated as totex and subject to the Tote Incentive Mechanism (TIM).
- **Peterborough and Huntingdon compressors:** As per the methodology decision document, the assessment of these projects will be completed at RIIO-GT2 closeout. An additional line will be added to the licence which will enable the assessment of the delivery of these projects. If the project is not delivered, or not delivered to the funded specification, we will include provision for an adjustment to NGT's RIIO-GT2 totex allowance not in excess of the allowance NGT received for the project in RIIO-GT1. Any over or underspend in RIIO-GT1 will be treated as totex and subject to the Totex Incentive Mechanism (TIM).
- **Hatton compressors:** An allowance adjustment is required for RIIO-GT1 Non-load capex to give effect to RIIO-GT2 Final Determination decision to fund project development costs of the Hatton compressor project in RIIO-GT1.

- 1.6 At RIIO-GT2, we stated that we would work with stakeholders to develop methodologies to closeout these areas. In October 2022, we modified the RIIO GT2 Price Control Financial Handbook ("the handbook") to incorporate the RIIO GT1 Close out methodologies. The methodologies, associated decision documents, consultations and responses, and notes from Working Group meetings are all on our website.
- 1.7 NGT gave us the data for our assessment. We carried out our assessment of their performance in line with the process and methodologies set 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

- 1.8 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 NGT to implement the detail of these adjustments.
- 1.9 Separately, we will initiate a process to consult on proposed drafting changes to the existing RIIO-GT2 gas transmission licence (the "GT2 Licence") to update,

where necessary, the text to reflect our closeout adjustment decision and to enable the impact on RIIO-GT2 baseline allowances to be accurately executed and represented. The amendments are intended to ensure the accuracy of the ongoing reporting requirements for the remainder of the price control period.

- 1.10 We will develop and set out our proposals in a forthcoming statutory consultation on changes to the GT2 Licence. This will be issued after the conclusion of this process on the proposed adjustments.

Structure of this document

- 1.11 Each chapter of the document covers a different area of the RIIO GT1 price control where a closeout funding provision was required.
- 1.12 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-GT1

[Consultation on the closeout methodologies for RIIO-GT1 | Ofgem](#)

Decision on methodologies to closeout RIIO-GT1

[Decision on the methodologies to closeout RIIO-GT1 | Ofgem](#)

RIIO-GT1 Strategy Decision

[Decision on strategy for the next transmission price control - RIIO-T1 | Ofgem](#)

RIIO-GT1 Final Proposals

[RIIO-T1: Final Proposals for National Grid Electricity Transmission and National Grid Gas – Overview | Ofgem](#)

Supplementary documents to the RIIO-GT1 Final Proposals

https://www.ofgem.gov.uk/sites/default/files/docs/2012/12/2_riiot1_fp_outputsincentives_dec12.pdf

https://www.ofgem.gov.uk/sites/default/files/docs/2012/12/3_riio1_fp_uncertainty_dec12.pdf

https://www.ofgem.gov.uk/sites/default/files/docs/2012/12/riio_gt1_fp_financialmodel_dec12.xlsm

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

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

- 1.13 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.
- 1.14 We've asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.
- 1.15 We will publish non-confidential responses on our website at www.ofgem.gov.uk/consultations.

Your response, data and confidentiality

- 1.16 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.
- 1.17 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.
- 1.18 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 4.
- 1.19 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

- 1.20 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?

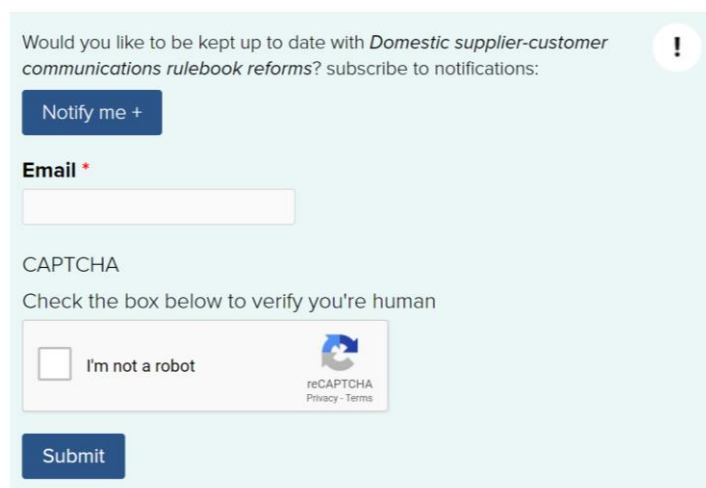
1.21 Please send any general feedback comments to stakeholders@ofgem.gov.uk


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. Pipeline Diversions

Summary

- 2.1 Pipeline Diversion costs are those incurred by NGT in relation to extant liabilities or other obligations to divert existing pipelines. These are costs incurred as a result of existing obligations/liabilities taken on by the Gas Council/British Gas, for which NGT is now responsible, and where NGT can demonstrate it has done everything in its powers to recover costs from the relevant party requesting the pipeline diversion.
- 2.2 Due to the uncertain nature of this work no baseline allowance was provided at Final Proposals and we stated that work would instead be funded through an uncertainty mechanism.
- 2.3 NGT did not trigger the Pipeline Diversion re-opener during RIIO-GT1 and therefore received no allowances for pipeline diversion work, however assessment of previous annual reports demonstrates that it did incur costs in this area during the price control.
- 2.4 Under the methodology, if costs incurred are material, we would implement a licence modification to enable an upwards revenue adjustment to true-up all efficiently incurred costs.
- 2.5 If costs are immaterial, we would make no revenue adjustment, and expenditure will be treated as totex and subject to the Totex Incentive Mechanism (TIM) sharing factor.

Closeout Assessment

- 2.6 Based on the information NGT has provided as part of their 2020/21 Regulatory Reporting Pack (RRP) submission, Pipeline diversion costs totalled £8.53m over RIIO-GT1.
- 2.7 As per the Closeout Methodology Decision Document Pipeline diversions is an area where a materiality threshold would be used to distinguish between material and immaterial costs.

- 2.8 The materiality threshold has not been met in this instance. Therefore, as Pipeline diversions is not eligible for a revenue adjustment, we are not proposing any adjustment. Any expenditure will be treated as totex and subject to the Totex Incentive Mechanism (TIM) sharing factor.

3. South West Quadrant

Summary

At Final Proposals we allowed NGT baseline funding to deliver an incremental capacity project in the South West Quadrant that had been signalled ahead of the price control. However, the project was cancelled prior to construction with no costs incurred.

- 3.1 The forecast capital expenditure for this project was added to NGT's RAV and NGT has made returns on this project throughout RIIO-GT1. NGT has committed to returning the allowance and any unearned RAV returns in relation to the South West Quadrant project to consumers in full.
- 3.2 Under the methodology, we would adjust the allowance values reflected in the PCFM to show that no expenditure was incurred by NGT in relation to this project. The adjustment automatically corrects the RAV and base revenue values for the RIIO-GT1 period and feeds through to the RIIO-GT2 LRAV and LMOD variable values.
- 3.3 A similar adjustment would be made to remove revenue relating to the South West Quadrant project that was still reflected in the legacy PCFM at the end of the RIIO-GT1 price control period.

Closeout Assessment

- 3.4 It remains our decision that all allowances and revenues associated with this cancelled project are returned to consumers in full.
- 3.5 NGT originally had an allowance of £40.7m (09/10 prices) for South West Quadrant. In line with the closeout methodology decision, we will make a downward adjustment equal to the allowance of £40.7m. This adjustment would be reflected in the Legacy PCFM to show no expenditure was incurred by NGT in relation to this project.
- 3.6 The adjustment automatically corrects the RAV and base revenue values for the RIIO-GT1 period and feeds through to the RIIO-GT2 LRAV and LMOD variable values.

4. Enhanced Physical Site Security

Summary

- 4.1 As part of the government's Physical Security upgrade Programme (PSUP), networks are required to implement physical security enhancements at sites listed as Critical National Infrastructure (CNI). The Department for Business, Energy and Industrial Strategy (BEIS) determines which sites require upgrades, and the design specification at each site must meet the requirements of the Centre for the Protection of National Infrastructure (CPNI).
- 4.2 PSUP is a cross-sector programme. At RIIO-GT1 Final Proposals network companies were provided baseline funding for known PSUP projects, and PSUP outputs and allowances were adjusted following re-openers in 2015 and 2018. However, Special Condition 3F of the GT1 Licence made no explicit provision to either (i) true up immaterial costs, or (ii) make allowance adjustments for material costs as part of RIIO-GT1 closeout.
- 4.3 Under the methodology, If NGT incurred efficient costs in excess of the RIIO-GT1 materiality threshold for which it was not funded, or if NGT has been funded a material amount to deliver projects that were later cancelled, we proposed a licence modification to enable an allowance adjustment to true up those net costs.
- 4.4 If the net costs incurred or avoided by NGT fall beneath the materiality threshold, we decided that there is no revenue adjustment made at closeout and that expenditure is treated as totex and subject to the TIM sharing factor.

Closeout Assessment

- 4.5 Based on the information NGT has provided as part of their Regulatory Reporting Pack (RRP) submissions across RIIO-GT1, Enhanced Physical Site Security costs totalled £m over RIIO-GT1.
- 4.6 The materiality threshold has not been met in this instance. Therefore, as Enhanced Physical Site Security is not eligible for a revenue adjustment, we are not proposing any adjustment. Any expenditure will be treated as totex and subject to the Totex Incentive Mechanism (TIM) sharing factor.

5. Peterborough and Huntingdon compressors

Summary

- 5.1 At Final Proposals, we set ex-ante baseline funding for Peterborough, Huntingdon and Aylesbury compressor sites to achieve compressor emissions compliance with Integrated Pollution and Prevention Control Directive (IPPCD)13 Phase 3 and Industrial Emissions Directive (IED) phase 1.
- 5.2 These projects were originally due to be delivered in 2020. Although the project at Aylesbury has been completed, the completion of the Peterborough and Huntingdon projects was impacted by Covid and issues with the Main Works Contractor (MWC).
- 5.3 NGT has committed to delivering these projects in RIIO-GT2 from its existing totex allowances and has not requested any additional funding at close out for either RIIO-GT1 costs incurred in excess of the allowance or for RIIO-GT2 forecast costs to project completion.
- 5.4 Under the methodology, we decided that any RIIO-GT1 allowance overspend is treated as totex and subject to the TIM.

Closeout Assessment

- 5.5 Due to the challenges NGT has encountered delivering these projects, we propose not to adjust allowances as NGT has committed to delivering these projects during RIIO-GT2 from existing totex allowances.
- 5.6 In line with the methodology decision, we intend on adding this specific output to NGT's licence to ensure its delivery. We will consult on adding a special condition to NGT's licence that makes provision to assess delivery of this project at RIIO-GT2 closeout.
- 5.7 If the project is not delivered, or not delivered to the funded specification, we will also include provision for an adjustment to NGT's RIIO-GT2 totex allowance not in excess of the allowance NGT received for the project in RIIO-GT1.
- 5.8 We will rely on the GT2 Licence to reserve the right to clawback allowances at RIIO-GT2 closeout in the event these delayed RIIO-GT1 projects are not delivered, or not delivered to the funded specification, in RIIO-GT2.

- 5.9 NGT is to report expenditure for Peterborough and Huntingdon as specific projects in the RIIO-GT2 RRs, reported under the compressor emissions cost category as non-load capex. All RIIO-GT2 expenditure on these projects will be treated as totex and be subject to the RIIO-GT2 TIM.

6. Hatton Compressor

Summary

- 6.1 All figures quoted in section 6 are in 2018/19 price base as per RIIO-GT2 Final proposals, unless stated otherwise.
- 6.2 The Industrial Emissions Directive (IED) is one of three main Directives influencing NGT's compressor emissions. Under this directive NGT were required to decommission two IED non-compliant RB211 compressor units at Hatton.
- 6.3 At RIIO-GT2 Final Determinations we set NGT an allowance of £74.51m to replace one compressor unit at Hatton to achieve compliance with IED legislation, which included £5.38m for Year 8 in RIIO-GT1 for project development costs. To date, NGT has received no allowance to deliver the RIIO-GT1 element of this work.

Closeout Assessment

- 6.4 As stated in our Closeout Methodology Decision document, we decided to increase NGT's RIIO-GT1 allowance by £5.38m to cover project development costs already incurred within the RIIO-GT1 price control (£4.1m 2009/10 prices).
- 6.5 As such we propose to adjust NGT's allowance in line with the total costs already incurred in RIIO-GT1 for the Hatton compressor project (£4.1m 2009/10 prices).
- 6.6 Additionally, we will adjust the PCFM Variable Value 'IAEIE' (Uncertain costs – Industrial Emissions) in the GT1 Legacy PCFM and re-run the legacy PCFM to calculate revised LMOD and LRAV variable values, which then feed into the RIIO-GT2 PCFM per the process described in Chapter 2 of the decision document⁴.
- 6.7 We decided that when assessing the RIIO-GT2 PCD we will assess the delivery of the whole project, making any adjustment as necessary to account for the costs provided for at RIIO-GT1 closeout.
- 6.8 We also decided that any over- or under-spend against the 2020/21 RIIO-GT1 allowance is treated as totex and subject to the TIM sharing factor.

⁴ GT Closeout Decision Document: [Decision on the methodologies to closeout RIIO-GT1 | Ofgem](#)

- 6.9 As per the GT Closeout Decision document this gives effect to our Decision on the Hatton compressor project at RIIO-GT2 Final Determinations⁵.

⁵ [RIIO-2 Final Determinations for Transmission and Gas Distribution network companies and the Electricity System Operator | Ofgem](#)

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

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](#)".