# **RIIO-ET3 Business Plan Data Template Commentary**

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Contact: RIIO-ET3 Cost Team

Team: RIIO-ET3 Cost Team

Email: RIIO3@ofgem.gov.uk

This document provides a template and instructions for providing supporting commentary for the RIIO-ET3 Business Plan data templates.

This document is for people who are filling out the RIIO-ET3 Business Plan data templates and this associated commentary template. It explains what information should be provided in the commentary, and where to find more information.

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Any enquiries related to the text of this publication should be sent to Ofgem at:

10 South Colonnade, Canary Wharf, London, E14 4PU.

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**Contents**

[RIIO-ET3 Business Plan Data Template Commentary 1](#_Toc178264216)

[1. Instructions and Guidance 7](#_Toc178264217)

[Background 7](#_Toc178264218)

[Instructions 7](#_Toc178264219)

[2. Data Table Commentary 9](#_Toc178264220)

[General Tables 9](#_Toc178264221)

[1.1 Cover 10](#_Toc178264222)

[1.2 Contents 10](#_Toc178264223)

[1.3 Version History 10](#_Toc178264224)

[1.4 Change Log 10](#_Toc178264225)

[1.5 Data Checks 10](#_Toc178264226)

[1.6 Not Used 10](#_Toc178264227)

[1.7 Assumptions 10](#_Toc178264228)

[1.8 Asset Possibilities 10](#_Toc178264229)

[1.9 Look up tables 11](#_Toc178264230)

[Finance Sheets 12](#_Toc178264231)

[2.1 Data Inputs 12](#_Toc178264232)

[2.2 Universal Data 12](#_Toc178264233)

[2.3 Monthly Inflation 12](#_Toc178264234)

[2.4 Debt for BPFM 12](#_Toc178264235)

[2.5 Financial Summary (TWA) 13](#_Toc178264236)

[2.6 Financial Summary (YE) 13](#_Toc178264237)

[2.7 Fixed Rate Debt 13](#_Toc178264238)

[2.8 Floating Rate Debt 13](#_Toc178264239)

[2.9 Inflation Linked Debt 14](#_Toc178264240)

[2.10 Debt Dataset 14](#_Toc178264241)

[2.11 Data Validation 14](#_Toc178264242)

[2.12 BPFM Inputs 14](#_Toc178264243)

[2.13 BPFM Inputs 2 14](#_Toc178264244)

[2.14 Difference 15](#_Toc178264245)

[2.15 Sum Cost Matrix Summary 15](#_Toc178264246)

[2.16 BP Tax Inputs 15](#_Toc178264247)

[2.17 BP Disposals 1 15](#_Toc178264248)

[2.18 BP Disposals 2 16](#_Toc178264249)

[2.19 Liquidity Licensee 16](#_Toc178264250)

[2.20 Liquidity Group 16](#_Toc178264251)

[2.21 Liquidity Group Structure 16](#_Toc178264252)

[2.22 RPE & OE Tables 17](#_Toc178264253)

[Totex Sheets 17](#_Toc178264254)

[3.1 Totex Annual Profile 17](#_Toc178264255)

[3.2 Overview Tables 17](#_Toc178264256)

[Cost and Asset Matrices Sheets 18](#_Toc178264257)

[4.1 Cost Matrix Collated 18](#_Toc178264258)

[4.2 Cost Matrix 2014 18](#_Toc178264259)

[4.3 Cost Matrix 2015 18](#_Toc178264260)

[4.4 Cost Matrix 2016 18](#_Toc178264261)

[4.5 Cost Matrix 2017 19](#_Toc178264262)

[4.6 Cost Matrix 2018 19](#_Toc178264263)

[4.7 Cost Matrix 2019 19](#_Toc178264264)

[4.8 Cost Matrix 2020 19](#_Toc178264265)

[4.9 Cost Matrix 2021 20](#_Toc178264266)

[4.10 Cost Matrix 2022 20](#_Toc178264267)

[4.11 Cost Matrix 2023 20](#_Toc178264268)

[4.12 Cost Matrix 2024 20](#_Toc178264269)

[4.13 Cost Matrix 2025 21](#_Toc178264270)

[4.14 Cost Matrix 2026 21](#_Toc178264271)

[4.15 Cost Matrix 2027 21](#_Toc178264272)

[4.16 Cost Matrix 2028 21](#_Toc178264273)

[4.17 Cost Matrix 2029 22](#_Toc178264274)

[4.18 Cost Matrix 2030 22](#_Toc178264275)

[4.19 Cost Matrix 2031 22](#_Toc178264276)

[4.20 Cost Matrix 2032 22](#_Toc178264277)

[4.21 Cost Matrix 2033 23](#_Toc178264278)

[4.22 Cost Matrix 2034 23](#_Toc178264279)

[4.23 Cost Matrix 2035 23](#_Toc178264280)

[4.24 Cost Matrix 2036 23](#_Toc178264281)

[4.25 Asset Movements 2014 24](#_Toc178264282)

[4.26 Asset Movements 2015 24](#_Toc178264283)

[4.27 Asset Movements 2016 24](#_Toc178264284)

[4.28 Asset Movements 2017 24](#_Toc178264285)

[4.29 Asset Movements 2018 25](#_Toc178264286)

[4.30 Asset Movements 2019 25](#_Toc178264287)

[4.31 Asset Movements 2020 25](#_Toc178264288)

[4.32 Asset Movements 2021 25](#_Toc178264289)

[4.33 Asset Movements 2022 26](#_Toc178264290)

[4.34 Asset Movements 2023 26](#_Toc178264291)

[4.35 Asset Movements 2024 26](#_Toc178264292)

[4.36 Asset Movements 2025 26](#_Toc178264293)

[4.37 Asset Movements 2026 27](#_Toc178264294)

[4.38 Asset Movements 2027 27](#_Toc178264295)

[4.39 Asset Movements 2028 27](#_Toc178264296)

[4.40 Asset Movements 2029 27](#_Toc178264297)

[4.41 Asset Movements 2030 28](#_Toc178264298)

[4.42 Asset Movements 2031 28](#_Toc178264299)

[4.43 Asset Movements 2032 28](#_Toc178264300)

[4.44 Asset Movements 2033 28](#_Toc178264301)

[4.45 Asset Movements 2034 29](#_Toc178264302)

[4.46 Asset Movements 2035 29](#_Toc178264303)

[4.47 Asset Movements 2036 29](#_Toc178264304)

[4.48 System Characteristics 29](#_Toc178264305)

[Load and Non-Load Sheets 30](#_Toc178264306)

[5.1 Project Meta Data 30](#_Toc178264307)

[5.2 Scheme Output 30](#_Toc178264308)

[5.3 Market Rate Information 30](#_Toc178264309)

[Load Sheets 30](#_Toc178264310)

[6.1 Scheme C&V Load Actuals 30](#_Toc178264311)

[6.2 Load ET1 Legacy Log 31](#_Toc178264312)

[6.3 Not Used 31](#_Toc178264313)

[6.4 Planning Consent Req 31](#_Toc178264314)

[6.5 T3 Baseline Load 32](#_Toc178264315)

[Non-Load Sheets 33](#_Toc178264316)

[7.1 Scheme C&V Non Load Actuals 33](#_Toc178264317)

[7.2 Non Load ET1 Legacy Log 33](#_Toc178264318)

[7.3 Spares 33](#_Toc178264319)

[7.4 ESR 33](#_Toc178264320)

[7.5 Losses 34](#_Toc178264321)

[7.6 Not Used 34](#_Toc178264322)

[7.7 T3 Non-Load Baseline 34](#_Toc178264323)

[Network Operating Costs Sheets 35](#_Toc178264324)

[8.1 Faults 35](#_Toc178264325)

[8.2 Inspections 35](#_Toc178264326)

[8.3 Maintenance 35](#_Toc178264327)

[8.4 Repairs 35](#_Toc178264328)

[8.5 Service Agreements 36](#_Toc178264329)

[8.6 Vegetation Management 36](#_Toc178264330)

[8.7 NOCs other 36](#_Toc178264331)

[8.8 Flood Mitigation 36](#_Toc178264332)

[8.9 Operational Technology 37](#_Toc178264333)

[8.10 Visual Amenity 37](#_Toc178264334)

[8.11 Faults and Failures 37](#_Toc178264335)

[8.12 Net Zero 37](#_Toc178264336)

[Other Operational Expenditure Sheets 38](#_Toc178264337)

[9.1 Non Op Capex 38](#_Toc178264338)

[9.2 Physical Security Capex 38](#_Toc178264339)

[9.3 Physical Security Opex 38](#_Toc178264340)

[9.4 CAI 38](#_Toc178264341)

[9.5 BS 39](#_Toc178264342)

[9.6 BS Allocation 39](#_Toc178264343)

[9.7 Op and Non-Op Training (CAI) 39](#_Toc178264344)

[9.8 NIS Cyber Resilience 39](#_Toc178264345)

[9.9 Uncertain Costs 40](#_Toc178264346)

[9.10 Innovation 40](#_Toc178264347)

[9.11 NIA 40](#_Toc178264348)

[9.12 SIF 40](#_Toc178264349)

[9.13 CNIA 40](#_Toc178264350)

[9.14 NIC 41](#_Toc178264351)

[9.15 Salary & FTE 41](#_Toc178264352)

[9.16 Related Party Margin 41](#_Toc178264353)

[9.17 Environment 41](#_Toc178264354)

[9.18 IIG SF6 Incentive 42](#_Toc178264355)

[9.19 DR Services 42](#_Toc178264356)

[9.20 Pass Through Costs 42](#_Toc178264357)

[Miscellaneous Sheets 43](#_Toc178264358)

[10.1 Asset Mapping 43](#_Toc178264359)

[10.2 Asset ID 43](#_Toc178264360)

[10.3 Site and Route ID 43](#_Toc178264361)

[10.4 Crossover Projects T2-T3 43](#_Toc178264362)

[10.5 ET Pipeline Log 44](#_Toc178264363)

[Memo Sheets 45](#_Toc178264364)

[11.1 ET Pipeline Log Memo 45](#_Toc178264365)

[11.2 ASTI & tCSNP 2 Memo 45](#_Toc178264366)

[11.3 D&D Memo 45](#_Toc178264367)

[11.4 HVDC Centre (SHET only) 45](#_Toc178264368)

[11.5 NARM Interface 46](#_Toc178264369)

[11.6 References 46](#_Toc178264370)

[11.7 DRS & De Minimis 46](#_Toc178264371)

[11.8 Vehicles & Transport Memo 46](#_Toc178264372)

[11.9 Climate Resilience Memo 46](#_Toc178264373)

[11.10 Contractor Indirects Memo 47](#_Toc178264374)

[Additional Commentary 48](#_Toc178264375)

[Additional commentary 48](#_Toc178264376)

1. Instructions and Guidance

### Background

* 1. This document, the RIIO-ET3 Business Plan Data Templates Commentary (BPDTC), is a template for Licensees to provide additional information alongside the Business Plan Data Templates (BPDT), to help:
     + identify, explain, and justify the main drivers of forecast expenditure and volume profile across the RIIO-ET3 price control period;
     + explain scenarios used to justify the forecast workload volumes and costs across the RIIO-ET3 period;
     + explain any assumptions made in populating the tables and how any allocations have been applied;
     + explain any allocation methodologies applied, which have not been detailed elsewhere in the business plan submission; and
     + assist Ofgem in the process of navigating the data submission and supporting documentation.
  2. This document should be read alongside the Business Plan data template instructions and guidance for RIIO-ET3, the RIIO-ET3 Business Plan guidance, and the RIIO-ET3 Sector Specific Methodology Decision.

### Instructions

* 1. Alongside the submission of the RIIO-ET3 BPDT, Licensees must, to the best of their ability, complete this BPTDC template for each worksheet in the BPDT. For each worksheet, where appropriate, include commentary on the following actions:
     + Compare the current forecast across the RIIO-ET3 period and the latest information on the forecast position across the RIIO-ET2 period, and explain any material step changes or differences between them. Please include information in terms of run rates, trends, unit costs, or another established metric, and explain the reason for any material step change or difference.
     + Summarise and explain the profile of the RIIO-ET3 information.
     + Provide justification for any unit cost/trend outliers, including any regional and/or site specific factors and where there is material interaction with other areas of the BPDT.
     + Identify and explain the scenario used for planning, the level of sensitivity within the forecasts used and clarify how uncertainty has been considered/tested. Indicate the materiality of these assumptions.
     + Explain interactions with wider governmental policy.
     + Explain the types of internal and external benchmarking exercise (where applicable) that have been undertaken to support the RIIO-ET3 forecasts (eg. internal tendered framework rates and/or international unit cost comparison).
     + Cross reference areas of the BPDT submission that can be used to further evidence or substantiate the submission (eg. cells A:B of tab “X” of the BPDT or supporting document “Y”).
     + Highlight any relevant additional information to aid Ofgem’s understanding and interpretation of the information.
     + Where costs have been apportioned across one or more activities, the basis of apportionment must be provided in the cost commentary document. Please also give an indication of the robustness of those assumptions.
  2. The BPDTC template is applicable to all worksheets in the final RIIO-ET3 BPDT, except for any cover, contents or summary sheets, and some finance, asset and other sheets. If Licensees consider it necessary or useful to provide supporting information on any worksheet we have not requested commentary on, there is space for this at the end of this document. Each Licensee must use reasonable endeavours to provide a commentary for each of the categories above. Licensees should report “n/a” where questions do not apply to the subject matter of the worksheet and should ignore any tables that do not apply to them.
  3. Licensees should endeavour not to exceed three pages in length for the BPDTC to each worksheet. However, we will accept BPDTCs longer than three pages where Licensees see merit in expanding on the commentary. Where visual representations of information (eg waterfall diagrams) may aid understanding these should be included and will not contribute to the page limit.
  4. Where information that is relevant for the BPDTC is located in the main Business Plan submission or supporting files (eg engineering justification, CBA, etc.); directions to the relevant information must be clearly signposted in the BPDTC. Where it is not possible to include all prescribed information, Licensees will need to clearly explain the reasons why.
  5. If any information or commentary has been provided in the wider business plan submission and there is explicitly and clearly a direct overlap of the requested content signalled in this BPDTC, Licensees may avoid duplicating the commentary on the basis that appropriate references are made to the relevant materials as noted in paragraph 1.6.
  6. The appropriateness and materiality of the commentary provided should be at a level that minimises the need for Ofgem to ask supplementary questions.
  7. Licensees should, to the fullest extent possible, ensure that the BPDTC contains all information relevant to Ofgem’s assessment of the plan. This includes providing a proportionate summary of the overall activity level experienced and costs incurred and expected by the Licensee. The BPDTC must therefore provide overview information on the level of activity and costs across the RIIO-ET1 (where applicable) and RIIO-ET2 periods and the current BPDT forecasts for the RIIO-ET3 period. Where a variance is observed in the transition between price control periods, a succinct explanation of the material differences between them and factors driving the variation is required.
  8. Licensees will submit the BPDTC alongside the BPDT and the final business plan except for worksheet 5.3 Market Rate Information. We request Licensees to submit this worksheet and commentary to Ofgem by 31 January 2025 COP. This will form part of the final business plan submission for RIIO-ET3 and thus will be subject to Business Plan Incentive (BPI) assessment. This is the only worksheet for which we will accept submission after the December deadline for the final business plans.

1. Data Table Commentary
   1. Licensees must provide commentary for each of the BPDT worksheets using the templates below.

## General Tables

### 1.1 Cover

*No input required.*

### 1.2 Contents

*No input required.*

### 1.3 Version History

*No input required.*

### 1.4 Change Log

*No input required.*

### 1.5 Data Checks

*No input required.*

### 1.6 Not Used

### 1.7 Assumptions

|  |
| --- |
| Commentary |
|  |

### 1.8 Asset Possibilities

|  |
| --- |
| Commentary |
|  |

### 1.9 Look up tables

|  |
| --- |
| Commentary |
|  |

## Finance Sheets

### 2.1 Data Inputs

|  |
| --- |
| Commentary |
|  |

### 2.2 Universal Data

|  |
| --- |
| Commentary |
|  |

### 2.3 Monthly Inflation

|  |
| --- |
| Commentary |
|  |

### 2.4 Debt for BPFM

|  |
| --- |
| Commentary |
|  |

### 2.5 Financial Summary (TWA)

|  |
| --- |
| Commentary |
|  |

### 2.6 Financial Summary (YE)

|  |
| --- |
| Commentary |
|  |

### 2.7 Fixed Rate Debt

|  |
| --- |
| Commentary |
|  |

### 2.8 Floating Rate Debt

|  |
| --- |
| Commentary |
|  |

### 2.9 Inflation Linked Debt

|  |
| --- |
| Commentary |
|  |

### 2.10 Debt Dataset

|  |
| --- |
| Commentary |
|  |

### 2.11 Data Validation

|  |
| --- |
| Commentary |
|  |

### 2.12 BPFM Inputs

|  |
| --- |
| Commentary |
|  |

### 2.13 BPFM Inputs 2

|  |
| --- |
| Commentary |
|  |

### 2.14 Difference

|  |
| --- |
| Commentary |
|  |

### 2.15 Sum Cost Matrix Summary

|  |
| --- |
| Commentary |
|  |

### 2.16 BP Tax Inputs

|  |
| --- |
| Commentary |
|  |

### 2.17 BP Disposals 1

|  |
| --- |
| Commentary |
|  |

### 2.18 BP Disposals 2

|  |
| --- |
| Commentary |
|  |

### 2.19 Liquidity Licensee

|  |
| --- |
| Commentary |
|  |

### 2.20 Liquidity Group

|  |
| --- |
| Commentary |
|  |

### 2.21 Liquidity Group Structure

|  |
| --- |
| Commentary |
|  |

### 2.22 RPE & OE Tables

|  |
| --- |
| Commentary |
|  |

## Totex Sheets

### 3.1 Totex Annual Profile

|  |
| --- |
| Commentary |
|  |

### 3.2 Overview Tables

|  |
| --- |
| Commentary |
|  |

## Cost and Asset Matrices Sheets

### 4.1 Cost Matrix Collated

|  |
| --- |
| Commentary |
|  |

### 4.2 Cost Matrix 2014

|  |
| --- |
| Commentary |
|  |

### 4.3 Cost Matrix 2015

|  |
| --- |
| Commentary |
|  |

### 4.4 Cost Matrix 2016

|  |
| --- |
| Commentary |
|  |

### 4.5 Cost Matrix 2017

|  |
| --- |
| Commentary |
|  |

### 4.6 Cost Matrix 2018

|  |
| --- |
| Commentary |
|  |

### 4.7 Cost Matrix 2019

|  |
| --- |
| Commentary |
|  |

### 4.8 Cost Matrix 2020

|  |
| --- |
| Commentary |
|  |

### 4.9 Cost Matrix 2021

|  |
| --- |
| Commentary |
|  |

### 4.10 Cost Matrix 2022

|  |
| --- |
| Commentary |
|  |

### 4.11 Cost Matrix 2023

|  |
| --- |
| Commentary |
|  |

### 4.12 Cost Matrix 2024

|  |
| --- |
| Commentary |
|  |

### 4.13 Cost Matrix 2025

|  |
| --- |
| Commentary |
|  |

### 4.14 Cost Matrix 2026

|  |
| --- |
| Commentary |
|  |

### 4.15 Cost Matrix 2027

|  |
| --- |
| Commentary |
|  |

### 4.16 Cost Matrix 2028

|  |
| --- |
| Commentary |
|  |

### 4.17 Cost Matrix 2029

|  |
| --- |
| Commentary |
|  |

### 4.18 Cost Matrix 2030

|  |
| --- |
| Commentary |
|  |

### 4.19 Cost Matrix 2031

|  |
| --- |
| Commentary |
|  |

### 4.20 Cost Matrix 2032

|  |
| --- |
| Commentary |
|  |

### 4.21 Cost Matrix 2033

|  |
| --- |
| Commentary |
|  |

### 4.22 Cost Matrix 2034

|  |
| --- |
| Commentary |
|  |

### 4.23 Cost Matrix 2035

|  |
| --- |
| Commentary |
|  |

### 4.24 Cost Matrix 2036

|  |
| --- |
| Commentary |
|  |

### 4.25 Asset Movements 2014

|  |
| --- |
| Commentary |
|  |

### 4.26 Asset Movements 2015

|  |
| --- |
| Commentary |
|  |

### 4.27 Asset Movements 2016

|  |
| --- |
| Commentary |
|  |

### 4.28 Asset Movements 2017

|  |
| --- |
| Commentary |
|  |

### 4.29 Asset Movements 2018

|  |
| --- |
| Commentary |
|  |

### 4.30 Asset Movements 2019

|  |
| --- |
| Commentary |
|  |

### 4.31 Asset Movements 2020

|  |
| --- |
| Commentary |
|  |

### 4.32 Asset Movements 2021

|  |
| --- |
| Commentary |
|  |

### 4.33 Asset Movements 2022

|  |
| --- |
| Commentary |
|  |

### 4.34 Asset Movements 2023

|  |
| --- |
| Commentary |
|  |

### 4.35 Asset Movements 2024

|  |
| --- |
| Commentary |
|  |

### 4.36 Asset Movements 2025

|  |
| --- |
| Commentary |
|  |

### 4.37 Asset Movements 2026

|  |
| --- |
| Commentary |
|  |

### 4.38 Asset Movements 2027

|  |
| --- |
| Commentary |
|  |

### 4.39 Asset Movements 2028

|  |
| --- |
| Commentary |
|  |

### 4.40 Asset Movements 2029

|  |
| --- |
| Commentary |
|  |

### 4.41 Asset Movements 2030

|  |
| --- |
| Commentary |
|  |

### 4.42 Asset Movements 2031

|  |
| --- |
| Commentary |
|  |

### 4.43 Asset Movements 2032

|  |
| --- |
| Commentary |
|  |

### 4.44 Asset Movements 2033

|  |
| --- |
| Commentary |
|  |

### 4.45 Asset Movements 2034

|  |
| --- |
| Commentary |
|  |

### 4.46 Asset Movements 2035

|  |
| --- |
| Commentary |
|  |

### 4.47 Asset Movements 2036

|  |
| --- |
| Commentary |
|  |

### 4.48 System Characteristics

|  |
| --- |
| Commentary |
|  |

## Load and Non-Load Sheets

### 5.1 Project Meta Data

|  |
| --- |
| Commentary |
|  |

### 5.2 Scheme Output

|  |
| --- |
| Commentary |
|  |

### 5.3 Market Rate Information

|  |
| --- |
| Commentary |
|  |

## Load Sheets

### 6.1 Scheme C&V Load Actuals

|  |
| --- |
| Commentary |
|  |

### 6.2 Load ET1 Legacy Log

|  |
| --- |
| Commentary |
|  |

### 6.3 Not Used

### 6.4 Planning Consent Req

|  |
| --- |
| Commentary |
|  |

### 6.5 T3 Baseline Load

|  |
| --- |
| Commentary |
|  |

## Non-Load Sheets

### 7.1 Scheme C&V Non Load Actuals

|  |
| --- |
| Commentary |
|  |

### 7.2 Non Load ET1 Legacy Log

|  |
| --- |
| Commentary |
|  |

### 7.3 Spares

|  |
| --- |
| Commentary |
|  |

### 7.4 ESR

|  |
| --- |
| Commentary |
|  |

### 7.5 Losses

|  |
| --- |
| Commentary |
|  |

### 7.6 Not Used

### 7.7 T3 Non-Load Baseline

|  |
| --- |
| Commentary |
|  |

## Network Operating Costs Sheets

### 8.1 Faults

|  |
| --- |
| Commentary |
|  |

### 8.2 Inspections

|  |
| --- |
| Commentary |
|  |

### 8.3 Maintenance

|  |
| --- |
| Commentary |
|  |

### 8.4 Repairs

|  |
| --- |
| Commentary |
|  |

### 8.5 Service Agreements

|  |
| --- |
| Commentary |
|  |

### 8.6 Vegetation Management

|  |
| --- |
| Commentary |
|  |

### 8.7 NOCs other

|  |
| --- |
| Commentary |
|  |

### 8.8 Flood Mitigation

|  |
| --- |
| Commentary |
|  |

### 8.9 Operational Technology

|  |
| --- |
| Commentary |
|  |

### 8.10 Visual Amenity

|  |
| --- |
| Commentary |
|  |

### 8.11 Faults and Failures

|  |
| --- |
| Commentary |
|  |

### 8.12 Net Zero

|  |
| --- |
| Commentary |
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## Other Operational Expenditure Sheets

### 9.1 Non Op Capex

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| Commentary |
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### 9.2 Physical Security Capex

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| Commentary |
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### 9.3 Physical Security Opex

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| Commentary |
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### 9.4 CAI

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| Commentary |
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### 9.5 BS

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| Commentary |
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### 9.6 BS Allocation

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| Commentary |
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### 9.7 Op and Non-Op Training (CAI)

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| Commentary |
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### 9.8 NIS Cyber Resilience

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| Commentary |
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### 9.9 Uncertain Costs

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| Commentary |
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### 9.10 Innovation

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| Commentary |
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### 9.11 NIA

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| Commentary |
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### 9.12 SIF

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| Commentary |
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### 9.13 CNIA

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| Commentary |
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### 9.14 NIC

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| Commentary |
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### 9.15 Salary & FTE

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| Commentary |
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### 9.16 Related Party Margin

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| Commentary |
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### 9.17 Environment

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| Commentary |
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### 9.18 IIG SF6 Incentive

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| Commentary |
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### 9.19 DR Services

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| Commentary |
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### 9.20 Pass Through Costs

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| Commentary |
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## Miscellaneous Sheets

### 10.1 Asset Mapping

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| Commentary |
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### 10.2 Asset ID

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| Commentary |
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### 10.3 Site and Route ID

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| Commentary |
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### 10.4 Crossover Projects T2-T3

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| Commentary |
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### 10.5 ET Pipeline Log

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| Commentary |
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## Memo Sheets

### 11.1 ET Pipeline Log Memo

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| Commentary |
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### 11.2 ASTI & tCSNP 2 Memo

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| Commentary |
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### 11.3 D&D Memo

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| Commentary |
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### 11.4 HVDC Centre (SHET only)

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| Commentary |
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### 11.5 NARM Interface

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| Commentary |
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### 11.6 References

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| Commentary |
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### 11.7 DRS & De Minimis

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| Commentary |
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### 11.8 Vehicles & Transport Memo

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| Commentary |
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### 11.9 Climate Resilience Memo

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| Commentary |
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### 11.10 Contractor Indirects Memo

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| Commentary |
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## Additional Commentary

* 1. TOs should include additional supporting commentary on the BPDT where they consider it necessary to aid Ofgem’s understanding of the BPDT submission. Please insert any additional commentary below using headings and commentary boxes.

### Additional commentary

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| --- |
| Commentary |
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