

## Annex 2 to EJD WWU.29 - Multiple Occupancy Buildings & Complex Distribution Systems

### 1.0 Introduction

This annex document provides additional supplementary information, specifically for CDSs, in support of EJD WWU.29 - Multiple Occupancy Buildings & Complex Distribution Systems, based on the feedback received from Ofgem in the Draft Determinations consultation process. This document content and structure has been developed based on the feedback received in bilateral discussions with the Ofgem Engineering Assessment team.

### 2.0 Winter Submission Summary

We submitted our Asset Health Engineering Justification Framework Document EJD WWU.29 in December 2024 with a comprehensive description of the assets within Complex Distribution System sites (CDSs) and we provided our justification for the interventions required on this asset group. This was based on the risk that has been determined for each building through our detailed inspection programme, taking into account the details for each building and the condition of the assets inspected.

As stated in our Asset Health Engineering Document, we are proposing replacement of mild-steel Riser/Lateral assets that are at 'end of life' and other Riser/Lateral systems that are constructed from materials which are not compliant with current standards and pose an unacceptable risk or are in poor condition. Our RIIO-GD3 workload and the associated costs are detailed in Table 1 below:

	RIIO-GD3	RIIO-GD3
	Costs (£m)	Workload (No.)
Planned Replacement	■	3,405
Replacement on Failure	■	0
Planned Refurbishment	■	19
Refurbishment on Failure	■	0
Planned Permanent Isolation	■	210
Permanent Isolation on Failure	■	0
MOB Buy Out	■	23
Riser Pipeline Isolation Valve Surveys	■	4,988
Total – Riser	■	8,646
Complex Distribution Systems	■	25
Total – CDS	■	25
Total	■	8,671

Table 1: RIIO-GD3 Submission Summary

### 3.0 WWU Draft Determination

#### 3.1 CDS Sites Draft Determination

In Ofgem's Draft Determinations consultation the proposed outcome for CDS sites was noted as '*Partially Justified*' and it was noted that "*Clearer inspection data is required for Complex Distribution Systems (CDS) sites to understand scope of works, specific site details, site asset health scores, risk scores, action threshold, site prioritisation, cost breakdown and planned intervention to justify inclusion in our draft determinations. CDS volumes have been reduced until this data is provided*".

# Appendix GDQ31A- Complex Distribution Systems

This Annex document provides additional data to supplement our original submission and to evidence the case for our newly revised workload volumes and costs, which we hope Ofgem will support in the Final Determinations.

The list of CDS sites proposed for intervention that was included in Appendix 5 of our Asset Health Engineering Justification Document, was an extract of our records taken at a point in time, just prior to submission of our GD3 Business Plan. It is important to note that our records continue to be updated as we continue to gather data from our ongoing CDS survey programme.

We are progressing our programme of surveys of the CDS population identified by ICS Consulting in risk priority order, planning to complete the very high risk sites by the end of GD2 and some high/medium risk sites, allocating a WWU risk score to each building based on the findings of the survey.

## 3.2 CDS Sites WWU Draft Determination Response

In RIIO-GD1 ICS Consulting provided WWU with a list of 1,489 potential CDS sites in the network. From the surveys completed so far, we have a confirmed population of 104 CDS sites (see Appendix C).

As noted in our Asset Health Engineering Justification Framework, the confirmed population and condition of the assets on our CDS sites is being validated as we progress through our survey programme, and we continue to reprioritise our intervention programme accordingly.

As shown in Table 2 below, at the time of submission of our GD3 Business Plan in December 2024, 75 CDS surveys had been completed with 25 sites (33%) identified for intervention. A further 29 surveys have since been completed, bringing the total number of surveys up to 104 CDSs and the total number identified for intervention up to 39 sites (38%). Detailed scope summaries have been used to define the planned intervention and to determine the costs which are now slightly lower than previously estimated.

				December 2024 Submission	August 2025 DD Response
RIIO-GD2	2021	2022	2023	2024 (P1 to P8)	2024 (P9) to 2025 (P7)
CDS Surveys Completed	3	14	24	34	29
Cumulative CDS Surveys Completed	3	17	41	75	104
CDS Site Intervention Identified				25	39
Percentage Sites for Intervention from Surveys Completed				33%	38%
CDS Site Cost for Intervention				■	■

Table 2: Progression of CDS Survey Programme

We have included the refreshed list of 39 CDS sites that have been identified for intervention in Appendix B of this Annex document. For each CDS site in our planned intervention programme we have included:

- Specific site details
- Risk score following survey
- Site priority based on total site risk (some sites with a lower risk score have higher priority based on the risk assessment of the site specifics that are not currently included in our risk score calculation)
- Planned intervention type
- Cost breakdown

As mentioned in our Asset Health Engineering Justification Document, the type of intervention (replacement/refurbishment/isolation/buy-out) is finally determined when projects are fully scoped.

For CDS sites, a score of 6+ is high risk, 3-6 is medium risk and less than 3 is low risk. Certain conditions including risers with heavy corrosion may mean that CDS sites with risk scores lower than 3 are included in our programme, particularly if there is a non-compliance with IGEM/G/5 Edition 3 noted in the inspection.

It should be noted that the assets on our CDS sites are not included in the NARM model, hence the asset health data cannot be provided for these in the same way as it is for MOB risers. This is consistent with all gas networks as we all use the same NARM model.

The detailed inspection data that has been requested is included in Appendix B, providing full engineering justification of our CDS site interventions in RIIO-GD3 (£[REDACTED]).

## 4.0 Conclusion

Following feedback within the WWU Draft Determinations and the Bilateral meeting between Ofgem and WWU on 5<sup>th</sup> August 2025, the CDS site information identified as missing is now provided within Appendix B. This provides full engineering justification of the intervention workloads on CDS sites in RIIO-GD3.

## 5.0 Appendices

### Appendix B

Appendix GDQ31B- CDS Confirmed Population August 2025



Appendix GDQ31B-  
CDS Confirmed Popu

### Appendix C

Appendix GDQ31C- CDS Sites Identified for Intervention



Appendix GDQ31C-  
CDS Sites Identified