

Guidance

RIIO-3 FIOC Guidance and Submissions Requirements Document

Publication date:	16/12/2025
Contact:	RIIO Team
Team:	Network Price Controls
Telephone:	0207 901 7000
Email:	RIIO3@ofgem.gov.uk

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This guidance covers the Funded Incremental Obligated Capacity Re-opener arrangements introduced as part of the RIIO-T3 gas transmission price control. The purpose of this re-opener is to assess projects associated with the release of funded incremental obligated capacity during the RIIO-GT3 price control (1 April 2026 to 31 March 2031).

This document is aimed at National Gas Transmission plc (referred to in this document as National Gas Transmission, NGT) as the owner and operator of the Great Britain National Transmission System (NTS), and any stakeholders with an interest in the process. The document sets out the different stages and submission requirements of the re-opener. It is the responsibility of NGT to decide what information is necessary to make a robust case for a proposed project and to provide us with all relevant information to inform our assessment.

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1. Introduction

Purpose of the document

- 1.1 This document sets out submission requirements under Part C of Special Condition 3.11 (Funded Incremental Obligated Capacity Re-Opener and Price Control Deliverable) of NGT's gas transporter licence.¹ Part G of that condition provides for the issuance of this document.
- 1.2 The Funded Incremental Obligated Capacity Re-Opener (the "FIOC Re-opener") allows NGT to apply for funding required to release Incremental Obligated Entry Capacity or Incremental Obligated Exit Capacity that cannot be released by Entry Capacity Substitution or Exit Capacity Substitution.²

Who should read this document

- 1.3 This document should be read by:
 - NGT, as the owner and operator of the NTS
 - Any stakeholders with an interest in the regulatory treatment of Incremental Obligated Entry Capacity³ or Incremental Obligated Exit Capacity⁴ gas transmission projects.

2. Overview of the FIOC Re-opener process

This section provides a summary of the FIOC Re-opener process. It sets out the different steps and a summary overview of the requirements for submissions made under this process.

- 2.1 NGT is the owner and operator of the NTS. NGT is funded to provide Entry Capacity and Exit Capacity through its price control settlement.
- 2.2 Where customers of NGT wish to buy enduring additional capacity above the existing levels of obligated capacity (such additional capacity is known as Incremental Obligated Entry Capacity and Incremental Obligated Exit Capacity), they will submit a Planning and Advanced Reservation of Capacity Agreement

¹ References to Special Conditions in this document are to National Gas Transmission plc, Gas Transporter Licence, Special Conditions.

² Defined terms in this document are taken from NGT's gas transporter licence unless otherwise stated.

³ As defined in the NGT's gas transporter licence, Special Condition 1.

⁴ As defined in the NGT's gas transporter licence, Special Condition 1.

(PARCA)⁵ application to NGT.⁶ NGT will assess applications under this process and, if viable, will work to produce options for delivery of the additional capacity to, or from, the NTS.

- 2.3 In the event that a request for enduring additional capacity cannot be met through substitution, NGT is able to request funding under the FIOC Re-opener by submitting a needs case⁷ submission, followed by an application for a FIOC Project Direction. If an application is approved by Ofgem, NGT will be funded to deliver an output by the date specified, as a Price Control Deliverable.⁸
- 2.4 Ofgem will assess any applications made by NGT under the FIOC Re-opener at both the needs case and FIOC Project Direction stages and will make a decision on whether an application should be approved. Where an application is approved by Ofgem, the funding allowance will be set via direction, given in accordance with Special Condition 3.11.

Overview of the re-opener stages and interactions

- 2.5 Figure 1 sets out an overview of the process timeline for the Re-opener, against the PARCA and planning processes, excluding the mechanism referred to in para. 2.10. Note the figure is not to scale.

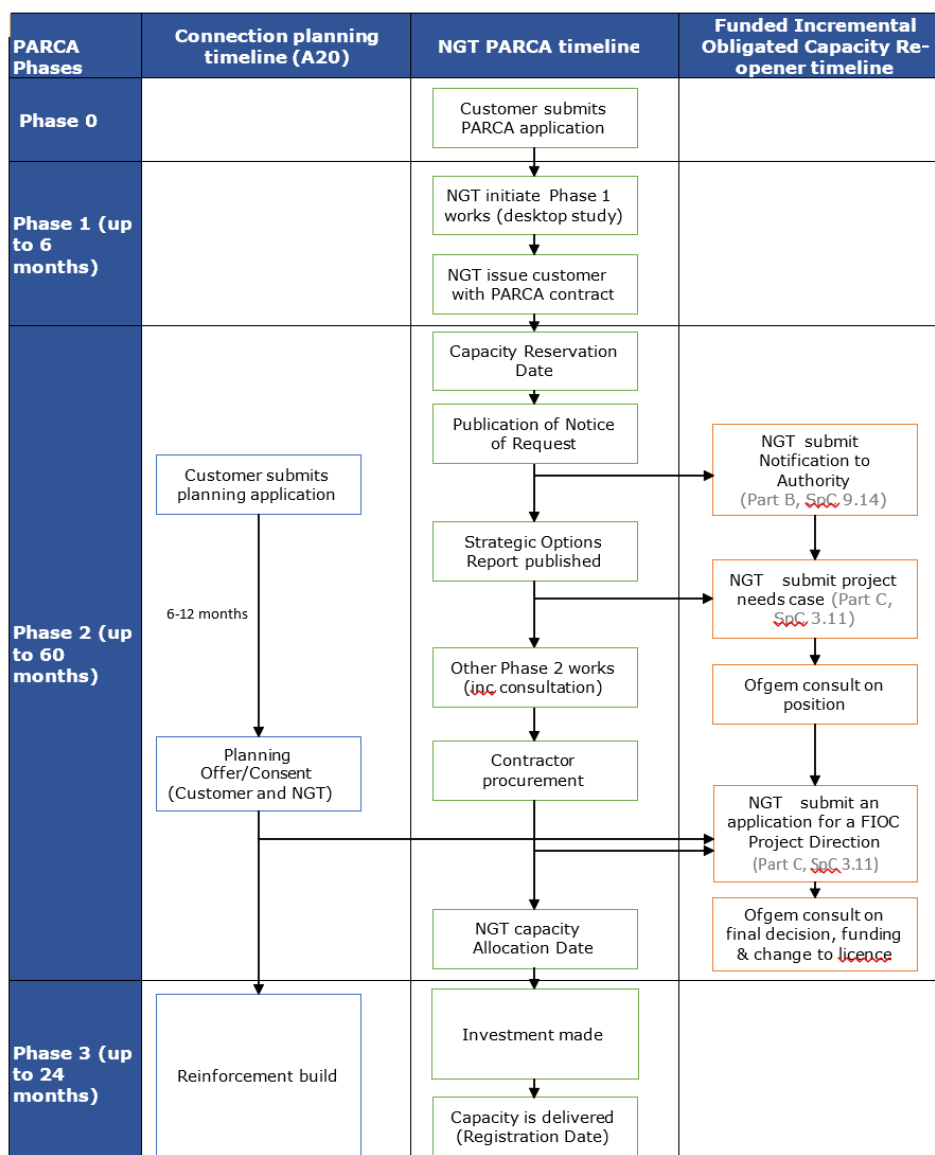
Figure 1: Overview of the FIOC Re-opener Stages and interactions

⁵ PARCA is defined in the Uniform Network Code. It relates to the reservation and allocation of Entry Capacity or Exit Capacity under "European Interconnection Document, Section E" of the Uniform Network Code.

⁶ The FIOC Re-opener is separate from the PARCA process but both processes interact at stages, along with the Connection (A20) process, where relevant. See Figure 1 sets out the high-level of how these processes overlap.

⁷ Needs case requirements are defined in section 3 of the Re-opener Guidance and Application Requirements Document.

⁸ The PCD framework provides for the adjustment of the level and timing of allowances in the event the output is not delivered, not delivered to the specification required, or delivered late.



- 2.6 If NGT applies for funding under the FIOC Re-opener, the first step is for NGT to explain, in a notification to Ofgem submitted under Part B of Special Condition 9.13 (Capacity Requests, Baseline Capacity and Capacity Substitution), why the relevant capacity falls within the scope of the FIOC Re-opener. Ofgem does not approve or reject such a notification. Receipt of the notification will initiate a process of engagement between Ofgem and NGT.
- 2.7 We will consult prior to making our decision on the project needs case and FIOC Strategic Option selection.
- 2.8 If we approve the project needs case and FIOC Strategic Option, and (unless we otherwise direct) once NGT has secured any material planning consents in relation to the proposed output, NGT will then be able to submit its application for funding and we will undertake a FIOC Project Direction assessment. This is where we will assess NGT's proposed costs and delivery plan.

- 2.9 Following the FIOC Project Direction assessment, if the funding application is approved, Ofgem will direct under Part F of Special Condition 3.11 the relevant output, delivery date and allowance in Appendix 1 of Special Condition 3.11, creating a new Funded Incremental Obligated Capacity (FIOC) Price Control Deliverable for the transmission project and an adjustment to NGT's allowed expenditure.
- 2.10 We will monitor the delivery of the project. Failure by NGT to fully deliver⁹ the specified output, may result in adjustment to the allowance, in line with Ofgem's Price Control Deliverable Reporting Requirements and Methodology Document, and potentially operation of one or more large projects incentives mechanism.
- 2.11 Under certain circumstances¹⁰, NGT may apply to Ofgem to adjust the funding, output and delivery date for a project, where the project expenditure has increased, or decreased significantly during construction. Ofgem can also trigger this adjustment mechanism.
- 2.12 NGT is funded to release the capacity associated with an output in Appendix 1 of Special Condition 3.11 in accordance with the terms of the relevant FIOC Project Direction.

3. Needs case / FIOC Strategic Option Assessment

This section sets out the timings and requirements for submissions made under the Needs Case / FIOC Strategic Option Assessment stage of the FIOC Re-opener process.

Overview of the needs case assessment stage

- 3.1 NGT should only submit a need case to Ofgem when the project has been sufficiently developed. We would expect this to be in Phase 2 of the PARCA process, after the completion of the FIOC Strategic Options report.

Needs case / FIOC Strategic Option submission requirements

⁹ Where the NGT has delivered the output set out in the relevant licence condition on or before the delivery date set out in the relevant licence condition.

¹⁰ Part C1 of Special Condition 3.11.

General

- 3.2 This submission must be made in compliance with Special Condition 3.11 (Funded incremental obligated capacity Price Control Deliverable and Re-opener), Special Condition 9.13 (Capacity Requests, Baseline Capacity and Capacity Substitution) and with the Re-opener Guidance and Application Requirements Document applicable at the time of application. In addition, NGT must provide the information and evidence referred to in paragraphs from 3.3 to 3.13 or explain why it has not provided such information.

Information referred to in paragraph 3.2 above

General information

- 3.3 Updated project summary, including identifying where any changes have been made to the information provided to Ofgem previously pursuant to the requirements in Part B of Special Condition 9.13.
- 3.4 Evidence that NGT has applied the capacity release methodologies in the statements maintained by NGT pursuant to Special Condition 9.17 (Methodology to determine the release of Entry Capacity and Exit Capacity volumes).
- 3.5 Evidence that any volumes proposed as Non-Incremental Obligated Entry Capacity or Non-Incremental Exit Capacity were determined in accordance with Special Condition 9.16 (Entry Capacity and Exit Capacity Obligations and Methodology Statements).
- 3.6 Information on any areas of its submission NGT expects may need to be updated in a subsequent application for a FIOC Project Direction.

Project delivery information

- 3.7 Latest project information, dependencies and estimated milestones, including:
- A delivery plan/schedule, including the project lifecycle, lead times, key milestones and a description of reporting mechanisms to monitor delivery and measure outcomes annually (this might include the introduction of a new Price Control Deliverable).
 - Project funding.
 - An assessment of the key uncertainties underlying the timing of the funding required.
 - Description and explanation of factors that have driven the decision on timing.
 - Delivery timeline.
 - Key dates or deadlines for Ofgem to consider when making an assessment.

Information about technical requirements

3.8 Technical summary demonstrating the validity of the technical requirements of the project, including:

- Technical details of the existing network configuration and characteristics, and the relevant NTS Entry/Exit Point(s) affected.
- An explanation of the technical assumptions used in the submission.

Options analysis

3.9 Statement of preferred option for the project.

3.10 Evidence of the selection process for preferred option, and estimated costs, including:

- A clear description of the options considered, setting out the key technical features of each option.
- An explanation of the capital and operational cost estimates for each option.
- Where appropriate, a market-based option.
- An explanation of NGT's appraisal methodology, including the information and evidence NGT has considered, and the weighting attached to the different factors.
- Consideration of potential benefits and risks of future proofing, e.g. including some anticipatory investment.
- The full detail of any Cost Benefit Analysis (CBA) carried out to assess options, in line with the RIIO-3 CBA guidance and submitted in the RIIO-3 CBA template.
- Full detailed description of the preferred option, and the rationale for selection, including the benefits and any drawbacks identified.
- Analysis and explanation of the consequences without the added investment.

Information in relation to long-term consumer value

3.11 Evidence on the expected long-term value of the proposed project for consumers, including:

- An explanation of the needs case for investment using the preferred option, along with a clear statement of how the investment will take into account wider considerations, including net zero targets for emissions.

- Monetised costs and benefits for consumers across different scenarios and a breakdown of proposed costs, methodology/modelling used and any assumptions.
- The overall value to consumers expected to be delivered as a result of the preferred option. This must include a statement of the expected impact of the solution on network capability, long term costs and net economic benefits.

Information on procurement strategy

3.12 Information relating to the proposed procurement strategy and scope of works, including:¹¹

- An explanation of the procurement and tender strategy for the project.
- An overview of the risk profile of delivering the project, including how NGT will manage these risks.
- An explanation of how lessons learned from previous projects will be applied to the project, where relevant.

Information on engagement with stakeholders

3.13 Information demonstrating that NGT has engaged with stakeholders during the development of the project and options analysis, including:

- NGT's stakeholder engagement plan and the range of stakeholders involved.
- An explanation of where and how stakeholders' views have informed the option analysis and selection of the preferred option.

Ofgem's Assessment

Ofgem's approach and considerations

3.14 Our assessment will follow the process set out in our Re-opener Guidance and Application Requirements Document. We will also consider any key dates or deadlines identified by NGT for the project.

3.15 As part of our needs case assessment, we will consider a number of areas, including but not limited to:

¹¹ At the point of submission to Ofgem, we do not expect the full project tender of works to be complete, nor final costs agreed with the selected contractor(s).

- Whether NGT has applied the capacity release methodology statements and the evidence of volumes proposed as non-incremental obligated capacity, in line with the respective licence conditions 9.13, 9.16 and 9.17.
- The validity of the project delivery timing (including key dates), factors and uncertainty assumptions.
- The validity of the technical requirement for any proposed reinforcement.
- Whether NGT has considered a reasonable range of the technically feasible options and/or operational measures to meet the network capability requirements.
- The quality of the optioneering, focusing on the justification for shortlisting options.
- Whether the cost benefit methodology is appropriate, and the sensitivity analysis is well justified.
- Whether there is a strong economic case for proceeding with the preferred solution, i.e. is it the most economical, efficient and coordinated solution relative to other options and is it in the interests of existing and future consumers overall.
- Whether the project is of long-term value to consumers.
- How the investment will take into account wider considerations, including net zero targets for emissions.
- The reasonableness of the procurement strategy and the associated risk management.
- Whether the project and options were developed with input from stakeholders.
- Aspects of the submission we consider may need updating by NGT in any subsequent application for a FIOC Project Direction.
- Any explanations provided by NGT as to why information/evidence has not been submitted.

Consultation

3.16 Following assessment of the needs case project submission, we will consult on our minded to position on the needs case and FIOC Strategic Option. We will consult for up to 28 days before issuing our Final Determination.

3.17 Output of the needs case / FIOC Strategic Option assessment

3.18 We will publish our decision on the areas covered by our assessment, including options assessment, CBA parameters, project risks and project programme.

3.19 In the event that Ofgem does not approve the needs case / FIOC Strategic Option for the proposed project, no obligation will arise for NGT to release the capacity associated with the application. NGT has discretion to release the capacity as

Non-Obligated Entry Capacity or Non-Obligated Exit Capacity in accordance with its capacity release methodology statements. Any pass-through of a PARCA Termination Value will be carried out in accordance with Special Condition 6.1.

4. Application for FIOC Project Direction

This section sets out the submission requirements for an application for a FIOC Project Direction. It also provides information on Ofgem's assessment of such applications.

Overview

- 4.1 NGT may only apply for a FIOC Project Direction once it has obtained Ofgem's approval of the needs case / FIOC Strategic Option for its proposed project and (unless Ofgem otherwise directs) once it has secured any material planning consents.
- 4.2 NGT may apply to Ofgem once the project has been sufficiently developed and once NGT has the necessary detail to inform our assessment. It is unlikely that an application for a FIOC Project Direction submitted before the following occurs will provide us with all of the information that we need for our assessment:
- NGT has confidence in its cost estimates;
 - NGT has received its final procurement offers from external suppliers¹²; and
 - NGT can provide clear evidence on subsequent negotiations with external suppliers leading to signing of contracts.
- 4.3 In considering NGT's application, we will look at the Final Preferred Option in greater depth with a view to potentially setting a new output and setting the efficient cost allowances that can be recovered from consumers for delivery of the project within Appendix 2 of Special Condition 3.11. We will assess the information submitted by NGT, including any information updated since its needs case / FIOC Strategic Option submission, and consider whether the proposed project represents value for money for present and future consumers. We will consider NGT's readiness to proceed with delivery and the efficiency of the total forecast costs of construction and other elements, including risk contingencies.

¹² This is not an implication or requirement that contracts should have been signed at this stage, rather that negotiations have reached final stages.

- 4.4 In considering the efficiency of the proposal we will use a number of approaches, including benchmarking costs, where comparable data is available.

Project direction submission requirements

General

- 4.5 This submission must be made in compliance with the Re-opener Guidance and Application Requirements Document applicable at the time of application. In addition, as a minimum, NGT is required to provide the information and evidence referred to in paragraphs 4.6 to 4.38 or explain why it has not provided such information. Prior to its application NGT must engage with us, to outline the materiality of the changes to the project need, cost and supporting evidence in comparison to the need case submission / FIOC Strategic Option approved for the relevant project earlier in the FIOC process.

Information referred to in paragraph 4.5 above

Cost information (Commercially sensitive and shall be considered as such by Ofgem)

- 4.6 A breakdown of all costs, cost disaggregation for asset types and cost schedules associated with the project.
- 4.7 Information on any costs related to incurred spend (NGT will need to clearly highlight this and demonstrate that the spend is efficient as with all other costs).
- 4.8 Information on where any project revenues will be received outside of RIIO-GT3 price control mechanisms, and on what basis.
- 4.9 Evidence that the costs are efficient, e.g. through cost benchmarking, market testing, or competitive tendering.
- 4.10 A description of the cost methodology (e.g. estimates, market testing, benchmarking) and a comparison, where possible, to historic costs in carrying out similar projects.
- 4.11 An explanation of which cost components have been acquired through a competitive tendering exercise.
- 4.12 A clear indication of the maturity of each cost, in accordance with our classification and the cost estimate accuracy noted (+/-%), and accompanied by the relevant supporting documentation, set out in Table 1:

Table 1: Details of the project cost types

	Classification	Description	Supporting documentation required
1	Fixed	The cost has been incurred, is not subject to change and has supporting documentation matching the amount.	Contract/bill with supporting documentation of payment made. Fully auditable if needed.
2	Agreed, but re-measurable	The cost has been agreed or estimated but is subject to change according to a clear and agreed variation process. Changes only driven by unforeseeable circumstances.	Contract/bill with supporting documentation of payment made/to be made. Fully auditable if needed.
3	Agreed, but will be re-measured based on known future information received	The cost has been agreed or estimated but will be subject to change due to clarifying the scope of works or due to additional surveys and assessments being undertaken. As above, changes should follow a clear variation process.	Contract/bill with supporting documentation of payment made/to be made. Rates auditable, volumes subject to change based on quantifiable and foreseeable factors.
4	Estimated	Cost estimated on the basis of assessments and actual surveys and using experience and examples from other projects.	Spreadsheet with the calculations (methodology), assumptions, variables and evidence base, with explanations. List of any surveys done as well as documentation of the surveys.
5	Early estimate	Costs estimated through modelling cost ranges from different projects and past experience.	Spreadsheet with the calculations (methodology), assumptions, variables and evidence base, with explanations List of any surveys to be performed to increase the confidence of the cost estimates.

Technical information

4.13 A description and details of the technical scope, construction works, and project route.

4.14 Details of any changes in design since earlier need case / FIOC Strategic Option submission approved for the project earlier in the FIOC process, with explanations and associated evidence as appropriate.

4.15 Details and justification of any technical designs (e.g. compressor station layout) and construction techniques to be used in the project (additional detail if design and/or construction activity is technically challenging, novel, or a cause for divergences in cost relative to industry benchmarks).

4.16 Details of any operational capability that is included in the technical proposal and justification for its inclusion.

Information on procurement and contracts

- 4.17 Details of the procurement strategy followed, including timetable and selection process.
- 4.18 Details of contract selection process, including how many bids were received on what terms and prices, and the process that was followed and justification applied for selecting a preferred bidder.
- 4.19 Project specifications (what was tendered).
- 4.20 Copies of the original Invitation To Tender (ITT) issued (or from subsequent tender rounds).
- 4.21 Outline of any relevant award criteria or negotiations in the selection process.
- 4.22 Justification for the chosen contractor in the form of a standardised and quantified comparison (with clear estimated value ranges for “difficult to quantify” selection criteria).
- 4.23 Any variation orders since signing major contracts.
- 4.24 Copies of signed contracts for all major construction sub-projects.
- 4.25 Details of the awarded contracts and a timetable for contracts which are to be awarded in the future.
- 4.26 Information on whether contracts are procured on a joint or individual basis between NGT and any associated developers.

Delivery strategy and risk management information

- 4.27 An explanation and a summary of any contingencies and other factors included in the cost of individual items.
- 4.28 A description of the delivery model and a detailed delivery plan/schedule with key dates and critical paths clearly identified, including any key dates or deadlines for Ofgem to consider when making an assessment.
- 4.29 Evidence of readiness to proceed, e.g. details of delivery team structure, roles and responsibilities.
- 4.30 Project management details, including hours worked/to be worked and rates used.
- 4.31 Details of previous experience in managing similar projects and how learning from previous projects (if applicable) will inform the proposed project.
- 4.32 The delivery risk profile of the proposed project, and an assessment of the key risks, and uncertain costs.
- 4.33 To the extent possible, the risk mitigation strategy and risk sharing arrangements, including what costs and risks have been included in supplier contracts, and why

this represents an efficient level (all incentives in the contract to encourage the supplier to deliver on time and to budget highlighted).

- 4.34 Details on the level of contingency risk that is included in the proposed costs and justification for why this is an appropriate level given other risk sharing mechanisms, such as the Totex Incentive Mechanism and the Cost and Output Adjusting Event provisions that are part of the FIOC Re-opener process.
- 4.35 A summary of the insurance strategy and any signed or near-signed contracts (including what factors are insured against).
- 4.36 Where applicable, information on NGT's policies (and project policy, where different) for managing:
- risks,
 - hedging and foreign exchange,
 - cost overruns or delays.
- 4.37 An up-to-date risk register (including the elements in Table 2 below along with details of how the risk register has been derived and the process for updating it (including audit trail).

Table 2: Risk register codes and ID

ID	Unique risk code
Project area	Which part of the project the risk relates to (example: weather downtime – subsea cable; ground conditions – underground cable)
Description of risk	A detailed description and rationale behind the risk, including the source of the risk.
Action	What actions have/will be taken towards the risk and how will the risk be monitored
Mitigations	What actions will/have been taken to mitigate the risk, with associated cost (estimates)
Fall-back action	Action that can be taken to fully mitigate the risk and negate its effects
Fall-back action cost	The cost of “fall-back action”
Risk identification date	Date when the risk was identified
Risk owner	Party best placed to control the risk (developer, contractor, etc.)
Risk owner rationale	Rationale why the party owning the risk has been identified as such
Risk date	Date when the risk is due to materialise or expire
Minimum cost	Minimum cost of the risk, after the mitigation actions
Minimum cost method	Calculations showing how the minimum cost has been derived together with the input value sources and rationale.
Most likely cost	Most likely cost of the risk, after the mitigation actions

Most likely cost method	Calculations showing how the most likely cost has been derived together with the input value sources and rationale.
Maximum cost	Maximum cost of the risk, after the mitigation actions
Maximum cost method	Calculations showing how the maximum cost has been derived together with the input value sources and rationale.
Probability of the risk occurring	Probability of the risk occurring
Probability of the risk occurring method	Calculations showing how the probability has been derived together with the input value sources and rationale. Values must be shown as P50.
Reference	Reference to the document/hyperlink to source of supporting documentation for calculating the min, best, max and probability values.

Updated information on need case

4.38 Updated information on need case:

- any missing or amended information relating to the requirements set out in Chapter 3.
- an explanation of the key drivers of the 'need' for the project and any material changes since the needs case submission.
- Details of the technical design of the project and any material changes to that proposed at the needs case submission.
- whether the results of the original CBA submitted in the needs case submission is still valid, and whether NGT considers the solution proposed in its needs case submission remains the optimal solution.

Ofgem's Assessment

4.39 Our assessment will follow the process set out in our Re-opener Guidance and Application Requirements Document.

4.40 As part of our assessment, we will consider a number of areas, including but not limited to:

- Whether there is sufficient detail on the technical design to demonstrate that the costs are efficient and that any optional capabilities included in the proposal represent long-term value for money.

- The robustness of the TOs process for procurement and selection, and whether this process had been efficiently applied and could be expected to lead to an efficient market outcome.
- The efficiency of the proposed costs, taking into account the conclusions on the above and any additional detailed cost assessment including benchmarking of specific elements where comparable data is available.
- The evaluation of risks, and the appropriateness of the proposed risk management strategy including the allocation of risks and the associated costs.
- The appropriateness of the construction programme and progress made towards being ready to proceed in the proposed timescales.
- Whether the need for the project remains valid, taking into account any additional evidence or information provided, following the FIOC Strategic Option needs case submission in Chapter 3. NGT should expect that we will revisit areas of our needs case assessment, as the project might have changed since the needs case submission. The validity of any justification for why any required information was not provided.

4.41 Our assessment will also include:

- The consumer benefits that NGT has identified could be achieved if this project is delivered on time (and hence the potential for consumer detriment if delivered late);
- Cashflow and financeability of NGT;
- The length of the construction period, and key milestones within that period which will be critical to ensuring timely delivery.

5. Delivery and adjustment to outputs, delivery dates or allowances

This section sets information about the delivery, and adjustment to project outputs, delivery dates or allowances.

Reporting

- 5.1 NGT is required to adhere to the Price Control Deliverable Reporting Requirements and Methodology Document for its responsibility for reporting on outputs under this condition.

Cost and Output Adjusting Event

- 5.2 Under certain circumstances, NGT may apply to Ofgem to amend the FIOC Output, delivery date or allowance, where project expenditure has increased, or decreased significantly during construction. The provisions for a Cost and Output Adjusting Event (COAE) are set out in Part C of Special Condition 3.11.
- 5.3 Any applications (as per paragraph 5.2), as well as our assessment will follow the process set in our Re-opener Guidance and Application Requirements Document.