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Date: 20 December 2011

Dear Colleague,

Notice of decision for the re-opener applications in respect of additional income associated with the Traffic Management Act 2004 (and Transport (Scotland) Act 2005) under the first gas distribution price control review

Introduction

The current gas distribution price control for 2008-2013 (GDPCR1) enables the gas distribution network operators (GDNs) to apply to Ofgem to adjust their revenues to recover costs associated with the Traffic Management Act 2004 and the Transport (Scotland) Act 2005.[1] Such applications can be made where costs associated with the implementation of this new legislation are in excess of one per cent of their base revenues.

We recently consulted on both our approach[2] for assessing such applications (process consultation) and our minded-to position[3] with regard to the applications received. This letter sets out our decision for the adjustment to GDNs' revenues and the timeframe over which this should be recovered. We would expect GDNs to consider the decisions and guidance set out in this letter and associated appendices when making any future re-opener applications, and when proposing future price control forecasts, relating to costs associated with the TMA.

Three of the eight GDNs, SGN Scotland, SGN Southern (the two GDNs owned and operated by Scotia Gas Networks (SGN)) and NGG North London (one of the four GDNs owned and operated by National Grid Gas (NGG)), have given notice to Ofgem confirming that they have started to incur significant costs following the implementation of the TMA. The total re-opener claim for the full price control period (2008-2013) by the three GDNs amounts to an additional £83.7 million.

Based on our analysis of the GDNs' submissions and following consideration of the responses to our minded-to consultation we will allow efficient additional costs for TMA for the three GDNs for the price control period of £41.6 million, as shown in Table 1. This will result in an average increase in consumer bills for 2012-13 of £4.50 for North London customers and £3.60 for SGN Southern customers.

[1] Traffic Management Act 2004 and the Transport (Scotland) Act 2005 referred to throughout this document collectively as "TMA" unless the context requires otherwise.
[2] Proposed process for the determination of re-opener applications in respect of a Traffic Management Act income adjusting event under the first gas distribution price control review
[3] Consultation on our minded-to position for the determination of re-opener applications in respect of additional income associated with the Traffic Management Act (and Transport (Scotland) Act) under the first gas distribution price control review

Table 1: Total additional allowed costs under TMA re-opener for 2008-2013 (2010-11 prices)

	£m
National Grid Gas - North London	18.9
Scotia Gas Networks - Southern	22.7
Scotia Gas Networks - Scotland	-
Total	41.6

In GDPCR1 final proposals we set out that we would include a specific re-opener mechanism to allow for additional costs arising as a result of the implementation of TMA. Given the uncertainty of the scope of TMA at the time, the re-opener was set out to cover the additional costs of working in the highway which were not considered at the time of finalising GDPCR1 final proposals. Local authorities manage the works in the highway through a combination of New Roads and Street Works Act (NRSWA) 1991 along with TMA. Our re-opener mechanism therefore looks to consider the GDNs' additional costs incurred due to change in operation of both NRSWA at the time of implementation of TMA and the TMA costs themselves. We are content that the costs in Table 1 are associated with the implementation of TMA and consider it reasonable to allow these associated efficient incremental streetwork costs.

To date SGN has provided insufficient evidence to support its position that the additional TMA costs for SGN Scotland are in excess of the one per cent of revenue threshold. For this reason we do not approve a re-opener amount for SGN Scotland.

The TMA costs in Table 1 have been calculated with reference to our benchmarking work, as set out in our minded-to position. GDNs submitted that the various ways in which local authorities implement the permit scheme can impact differently on the productivity of the GDNs and that our assessment of TMA costs needs to take this into account. However, the companies have been unable to provide us with robust quantitative evidence to support their position. In response to these representations we will allow GDNs to apply for a further revenue adjustment at the end of GDPCR1 if they can produce this evidence and demonstrate that the allowances made for 2011-12 and 2012-13 are not adequate to cover their efficient costs in those years. We will not be adjusting our increased allowance for 2008-09 to 2010-11. This is discussed further below and in Appendix 2.

While progress has been made on coordinated working, it was evident from the responses to the minded-to consultation that both GDNs and local authorities were not always working proactively together to ensure that work in the highway is carried out in the most efficient way for both road users and gas customers. Going forward we would expect there to be greater collaboration between both parties to achieve such efficiencies.

Background

In December 2007, when we were setting the current price control, the impact of the implementation of the TMA on the GDNs' costs was unclear and we were not in a position to make provision for an efficient level of cost for work carried out as a result of the TMA.[4] For this reason we introduced a specific price control re-opener mechanism so that any further costs associated with the implementation of TMA could be considered in isolation from the GDNs' financial performance within the price control period. The term in the price control formula which reflects the ability for a further adjustment to be made to allowed revenues is ITMAt.

[4] The exception was an expenditure allowance related to the systems which GDNs were putting in place in anticipation of its introduction, where we provided all GDNs with a total capital expenditure allowance of £11.3 million for 2008-09 to cover these costs.

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Special Condition E7 of the gas transporter licence[5] sets out a mechanism under which GDNs can apply for their allowed revenues to be adjusted, together with a notice of costs or expenses incurred or likely to be incurred. Following consultation, the Authority determines whether the threshold has been reached to trigger the re-opener and whether any or all of the costs or expenses were or are likely to be efficiently incurred and any adjustment that should be made to their allowed revenue.

Responses to minded-to consultation

We have summarised the responses to the minded-to consultation in Appendix 1, GDNs and local authorities broadly disagree with the allowance we have set for fixed penalty notices and other costs (predominantly productivity costs).

Further discussions

Since the closure of our minded-to consultation we have had further discussions with NGG, SGN, the Department for Transport (DfT) and Transport for London (TfL).

DfT and TfL emphasised their concern over allowing any costs for fixed penalty notices. They also wanted a further understanding of issues surrounding productivity costs.

In our discussions with SGN it was agreed that they need to provide further evidence to support their claim for SGN Scotland and that we need to carry out further assessment of the differences between NRSWA and T(S)A costs. While we are not proceeding with SGN Scotland's application at this stage, they are able to revisit their application once they have further evidence to support their claim.

SGN also noted that some of their costs reported against administration costs should have been reported as productivity impacts. For consistency we asked NGG whether these costs should be moved to productivity costs. However, they indicated that they should be reported against administration costs for the benchmarking to be carried out on a like-for-like basis.

We indicated in our process consultation that we would be looking to benchmark GDNs performance. Following discussions with the GDNs on the level of data captured we agreed the format of the information requests on which we would be undertaking our benchmarking analysis.

NGG stated in their response to the process consultation that "*due to the difficulties of assessing these costs on a job by job basis, which would be prohibitively expensive and prone to distortion through job specific factors (each job is unique and will encounter different physical and permit conditions), National Grid Gas has utilised an aggregate top down approach which has been compared against non-permit scheme London Boroughs. We believe this to be the most pragmatic and most reliable means to assess the overall impact of the TMA on Productivity.*"

In latest correspondence NGG provide an assessment of the different productivity impacts to those that we set out in our minded-to decision, highlighting that some local authorities operating in their network implement the TMA more stringently than others, and that our benchmarking needs to take this into account. We requested again that they quantify the costs per local authority and recent information provided by NGG on costs being incurred in local authorities for 2010-11 indicate different productivity impacts on a local authority by local authority basis. However the information did not fully support the argument that authorities operating in sensitive commercial or political areas apply the regulations more strictly.

[5] Special Condition E7: Determination of any adjustment factor to be applied to MRt (IAEt)

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Our decision and reasons

We have considered the responses and the further discussions following our minded-to consultation.

For permit costs we will allow costs as proposed in our minded-to consultation.

With regard to increasing the level of unit costs from £80 for fixed penalty notices, it should be noted that in SGN Southern's submissions, the unit cost for penalties for 2010-11 onward is circa £80. Additionally, all fixed penalties attract a discount for early settlement and we would expect an efficient company to take advantage of this discount and any costs above this should not be passed to the customer. We are aware that Code 08 (working without a permit) discounted penalty is £300 for early settlement, but we do not consider that a GDN should at any time be working in the road without a permit. Therefore, we will not be increasing this unit cost.

We recognise the local authorities' view that we should not allow the GDNs to recover any costs associated with fixed penalty notices. They consider that GDNs should aim for zero penalties, but we have to consider the efficient investments and the ongoing costs that are required, which would ultimately be passed to the customer, for the GDNs to achieve zero penalties. We have also noted in NGG's business plan for RIIO-GD1 that since the introduction of TMA they have improved their noticing compliance performance from 70% to 97% over a four year period, but to achieve performance levels of greater than 97% they would require a large amount of additional resources. We have therefore allowed the proposed costs in the minded-to position for the first three years of the current price control. For the final two years we have decided to reduce the level of fixed penalty notices allowed from 6% to 3%.

For administration costs we have considered SGN's request to move some of the costs for Southern from administration to productivity, but following further discussions with NGG we consider these costs are already reported consistently in both applications. We will therefore retain the approach we set out in our consultation.

We are not disputing NGG's claim that the administration costs in their application are observed costs, but we have benchmarked these against SGN Southern administration costs and believe that £8,000 per project is an efficient level. We have therefore allowed efficient administration costs as proposed in the minded-to consultation.

For other costs we accept that there may be differences in the implementation of TMA across local authorities, but expect the GDNs to have the systems in place to be able to capture any difference in costs amongst local authorities, to present robust information on the differences in practices that are being followed and to be able to explain the impact of these practices on the GDNs' costs. As part of GDPCR1, GDNs were given a total capital expenditure allowance of £11.3 million for 2008-09 to put in place systems in anticipation of the introduction of TMA. We would therefore expect the GDNs to be able to demonstrate the cause and the actual increased costs associated with the introduction of TMA. Indeed it is important that they have such management information, to be able to demonstrate that they are managing these costs efficiently and working to influence local authorities where the productivity impact of TMA is particularly high.

We note that in both NGG's re-opener application and their response to our process consultation, they recognised the difficulties of assessing these costs on a job by job basis, stating it would be prohibitively expensive and prone to distortion through job specific factors. They have therefore used an aggregate top down approach which has been compared against non-permit scheme London boroughs. They believed this to be the most pragmatic and most reliable means to assess the overall impact of the TMA on productivity rather than distinguishing between local authorities. Without detailed local authority costs we believe the only way to identify efficient costs is to benchmark costs, as stated in our process consultation, between the two London GDNs.

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We do not consider that NGG is able to adequately substantiate the difference in costs across local authorities for the period 2008-09 to 2010-11. Therefore for those years we will maintain the unit cost at £18 per metre of iron mains abandoned. In arriving at this unit cost we have benchmarked the two London GDNs establishing an average unit cost for each GDN which takes into account differences in application of TMA by local authorities. For the final two years of the current price control we have removed our proposed efficiency assumption and set the unit cost at £18 per metre of forecasted iron mains abandoned. However, as part of this decision we are proposing that where companies can provide robust evidence going forwards that the productivity impact of TMA has a more material impact in specific local authorities we will consider adjustments to the £18 per metre of iron mains abandoned for the final two years of the current price control. We have set out the guidelines for evidence required to support any future submissions in Appendix 2.

We consider further evidence is needed from SGN on the materiality of the claim for SGN Scotland. SGN are able to gather further evidence and submit a further application for a re-opener at the end of the current price control in accordance with Special Condition E7. We expect further evidence to be provided in support of any future claim. This should include detailed evidence of the differences between the costs included as part of the implementation of NRSWA and T(S)A, and the differences between the implementation of T(S)A in Scotland and the implementation of TMA in England and Wales.

For the introduction of section 74 NRSWA daily charge rates and section 74A NRSWA lane rental charges, we maintain our minded-to position and will allow the GDNs to apply to re-open at the end of the current price control if they meet the requirements set out in Special Condition E7 due to the uncertainty of when and where a lane rental scheme may be implemented.

If the TMA is implemented by any further local authorities between now and the end of the GDPCR1 period, we will allow GDNs to log up the associated costs, for recovery at the beginning of the RIIO-GD1 period. We will base any future allowance on the unit costs stated in this decision document, with adjustments for economies of scale and any differences in the implementation of schemes outside the London boroughs, and actual workloads eg number of permits issued, number of projects and iron mains abandoned.

Tables 2 and 3 below set out the additional allowed costs and revenues for the TMA re-opener.

Table 2: Total additional TMA cost for 2008-2013 (2010-11 prices)

	Actual costs			Projected costs		**Total costs over 5 yrs**
	2008-09	2009-10	2010-11	2011-12	2012-13	**2008-13**
	£m	£m	£m	£m	£m	**£m**
National Grid Gas - North London	0.4	2.7	3.9	5.9	6.1	**18.9**
Scotia Gas Networks - Southern	0.4	0.9	5.9	6.8	8.7	**22.7**
Scotia Gas Networks - Scotland	-	-	-	-	-	**-**

Table 3: Total adjustment to allowed revenues for TMA (2010-11 prices)

	GDN Submission	**Ofgem's decision**
	£m	**£m**
National Grid Gas - North London	**22.0**	**10.1**
Scotia Gas Networks - Southern	**22.7**	**13.5**
Scotia Gas Networks - Scotland	**5.0**	**-**

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The revenue adjustments in Table 3 reflect our assessment of operating expenditure (opex) and 50 per cent of replacement expenditure (repex) spent on TMA during GDPCR1. Capital expenditure (capex) and the other 50 per cent of repex are profiled over a 45-year period from the year in which they were incurred. The timing difference between when spend on TMA (whether opex, capex or repex) had been incurred and when it is remunerated is accounted for on a net present value-neutral basis, so that it is fair both to consumers and the network companies. Hence why the revenue numbers in Table 3 do not match the costs presented in Table 2.

The additional revenues shown in Table 3 should be recovered during 2012-13.

We would expect GDNs to consider the decisions and guidance set out in this letter and associated appendices when making any future re-opener applications, and when proposing future price controls forecasts, relating to costs associated with the TMA. However, we would expect the unit costs used to be adjusted to reflect factors including economies of scale and the differences in working inside and outside London. Additionally, we would expect network operators (NWOs) to demonstrate continued efficiencies in delivering streetworks.

Decision pursuant to section 38A of the Gas Act 1986.

Yours sincerely,

Rachel Fletcher
Acting Senior Partner,
Smarter Grids & Governance: Distribution

Signed on behalf of the Authority and authorised for that purpose

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Appendix 1: Responses to minded-to consultation

We received 16 responses to our consultation, which have been published on our website. These include responses from several NWOs and their associated bodies, two shippers, several local authorities and their associate body, the Scottish Road Works Commissioner (SRWC) and the Chartered Institute of Highways and Transportation (CIHP).

The shippers broadly accepted our proposed position and accept that it was appropriate to recover the additional allowed revenues over the 2012-13 business year.

The GDNs challenge the use of £80 as a unit cost for fixed penalties as some penalties can be higher. They also disputed the use of permits as a driver for fixed penalty notices costs, with one recommending the number of projects or notices as being a more suitable driver.

NGG consider that administration costs should be funded in full as their administration costs are all observed costs in relation to the application of TMA. Both NGG and SGN also believe that there needs to be a new mechanism for dealing with the escalation of administration costs as the number of local authorities implementing a permit scheme increases.

The GDNs disagree with the allowance of £18 per metre of iron mains abandoned for other costs (predominantly productivity costs), believing this should be higher. NGG do not believe that we have taken into account the cost implications of the different ways in which certain local authorities have implemented the permit scheme, specifically those located in commercial and political areas, such as Kensington & Chelsea, Westminster and the City of London.

The GDNs also consider that, over time, the implementation of the permit scheme will become more stringent and this will become standard across local authorities. Therefore, they believe it will not be possible to keep their TMA related costs within our proposed unit rate allowance for other costs.

SGN disagree with us disallowing the claim for SGN Scotland and argue that the costs claimed are associated with the introduction of T(S)A and are material.

The local authorities disagree with our minded-to position to allow any allowance for fixed penalty notices as they believe these are all avoidable and that penalties are only issued due to inefficient planning. Some local authorities believed that all, or the majority of, costs associated with TMA are caused as a result of inefficient planning of activities in the public highway and disagree with the proposed adjustments.

Both NGG and SGN welcome the proposals for uncertain costs for increases for lane rental[6], NRSWA daily charge rates[7] and future local authorities that may implement TMA.

SGN pointed out that our minded-to consultation stated that SGN's application for 2008-09 and 2009-10 was shown in 2010-11 prices, where in fact these had been submitted in nominal prices. We are satisfied that this has no effect on our minded-to position and the unit cost used to derive the proposed allowance as these were calculated using 2010-11 and forecasted costs. However, we have restated the tables at Appendix 3 to ensure all costs are in 2010-11 prices.

[6] Section 74A of New Roads and Street Works Act (NRSWA) 1991
[7] Section 74 New Roads and Street Works Act (NRSWA) 1991

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Appendix 2: Guidance on further evidence required to support re-opener applications

Where a GDN is applying for productivity unit cost greater than £18 per metre of iron mains abandoned then a re-opener application should follow the principles set out in Special Condition E7 and should be submitted to Ofgem within three months following the end of GDPCR1.

GDNs should include the following information to support any such applications:

- Evidence of the additional workload and costs incurred over and above costs for permits, fixed penalty notices, GDN administration of streetworks and the allowance for other costs that have been provided for in this decision paper (£18 per metre of iron mains abandoned), independently for each of the local authorities that operate a TMA permit scheme within their network.
- Information to demonstrate that local authorities are taking different approaches to operating a streetworks scheme and to explain the impact of these differences on the GDN's efficient working in the road.
- Evidence that the GDN has worked with the local authorities to influence the efficient application of a streetworks permit scheme which is consistent across all local authorities.
- Evidence that the GDN is working collaboratively with other utility operators to influence the efficient and consistent application of a streetworks permit scheme by local authorities and to minimise costs.
- Evidence that the GDN is working with the local authorities to achieve zero fixed penalty notices, and where the GDNs believe this is not possible, evidence that any fixed penalties claimed for in their application have been incurred efficiently and all reasonable and practical efforts have been made to avoid them.

The application should only include additional workload and costs that have arisen over and above those incurred prior to the implementation of a TMA permit scheme within each of the local authorities. Applications should include information on:

- Actual iron mains abandoned within the area to which TMA has been applied.
- Number of fixed penalty notices, broken down by type (eg code 1 - 9).
- Cost of fixed penalty notices.
- Number of total working hours within the local authority.
- Number of working hours per year outside the normal working hours (eg weekend and evening shifts).
- Working methods in the field including additional materials & logistics due to permit restrictions to working length.
- Cost of working hours outside the normal working hours relating to implementation of TMA (eg weekend and evening hours).
- Parking bay suspensions (costs & number of parking bay suspensions).
- Temporary traffic restriction orders.
- Additional reinstatement costs.
- Modifications to existing traffic signals.
- Bus stop suspensions (costs & number of bus stop suspensions).
- Traffic separators/project revisions.
- Connections and repair costs.
- Increase in inspection charges.
- Public advance noticing.
- Contractors TMA claims (details to be provided).

As part of the methodology for collecting and substantiating the additional costs associated with the TMA the company should set out baseline assumptions for each of the GDNs for the costs of doing standard capital (capex), replacement (repex) and operational (opex) expenditure jobs prior to the introduction of the TMA (eg for repex: number of working hours per km, number of working hours outside normal working hours per km, additional

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material and logistics costs under NRSWA). They should then evidence the equivalent costs under TMA and explain the factors driving the difference.

We will audit a sample of schemes to verify the information that is being used to derive the productivity data.

Whilst these guidelines are specific to support any additional application for a re-opener for final two years of the current price control for other costs by SGN Southern and NGG North London, the guidelines should be considered by any other GDN for any potential re-opener claim during GDPCR1 and in their submissions for RIIO-GD1.

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Appendix 3: Table error in minded-to consultation

This appendix updates the tables published in the minded-to consultation to show all costs in 2010-11 prices.

Table 4: Amended Table 1 Summary of proposed adjusted costs for North London and Southern (2010-11 prices)

	National Grid Gas - North London			Scotia Gas Networks - Southern		
	GDN application	**Ofgem's minded to position**	*difference*	GDN application	**Ofgem's minded to position**	*difference*
	£m	**£m**	£m	£m	**£m**	£m
Permits	2.37	**2.38**	*0.01*	5.42	**2.92**	*-2.50*
Fixed Term Penalty Notices	0.44	**0.14**	*-0.30*	0.59	**0.18**	*-0.41*
Ongoing administration costs	8.48	**7.42**	*-1.06*	15.23	**7.49**	*-7.73*
Other costs	19.42	**8.55**	*-10.87*	16.50	**11.38**	*-5.12*
Lane rental (inc S74 charges)[1]	7.95	**0.00**	*-7.95*	*7.95*	***0.00***	*-7.95*
Total	**38.67**	**18.50**	*-20.17*	**37.73**	**21.97**	*-15.76*

[1]Included in London's application are costs for lane rental and section 74 daily charge rates of £9.5m for 2012-13. Southern indicated this as an uncertainty and assessed these costs to be £7.95m, but this did not form part of their application.

Table 5: Amended Table 4 Proposed allowed costs (2010-11 prices)

	National Grid Gas - North London						**Scotia Gas Networks - Southern**					
	Actual costs			**Projected costs**		**Total costs over 5 yrs**	**Actual costs**			**Projected costs**		**Total costs over 5 yrs**
Original expenditure data (£m)	2008-09	2009-10	2010-11	2011-12	2012-13	**2008-13**	2008-09	2009-10	2010-11	2011-12	2012-13	**2008-13**
Permits	0.00	0.10	0.64	0.78	0.85	**2.37**	0.00	0.00	0.73	1.75	2.95	**5.42**
Fixed Term Penalty Notices	0.01	0.06	0.11	0.13	0.13	**0.44**	0.01	0.15	0.11	0.14	0.18	**0.59**
Ongoing administration costs	0.35	1.13	1.98	2.40	2.63	**8.48**	1.01	2.25	3.15	4.25	4.57	**15.23**
Other costs	0.62	2.80	4.45	5.70	5.85	**19.42**	0.00	1.02	3.51	5.32	6.64	**16.50**
Lane rental (inc S74 charges)[1]	0.00	0.00	0.00	0.00	7.95	**7.95**	*0.00*	*0.00*	*0.00*	*1.45*	*6.50*	***7.95***
Total	**0.98**	**4.08**	**7.18**	**9.01**	**17.41**	**38.67**	**1.02**	**3.41**	**7.50**	**11.46**	**14.34**	**37.73**
Adjusted expenditure data (£m)	2008-09	2009-10	2010-11	2011-12	2012-13	**2008-13**	2008-09	2009-10	2010-11	2011-12	2012-13	**2008-13**
Permits	0.00	0.12	0.64	0.78	0.85	**2.38**	0.00	0.00	0.73	1.05	1.14	**2.92**
Fixed Term Penalty Notices	0.00	0.01	0.04	0.02	0.03	**0.09**	0.00	0.00	0.04	0.03	0.03	**0.11**
Ongoing administration costs	0.35	1.13	1.46	2.20	2.29	**7.42**	0.44	0.88	1.76	1.75	2.67	**7.49**
Other costs	0.00	1.48	1.79	2.85	2.92	**9.04**	0.00	0.00	3.38	3.93	4.82	**12.13**
Lane rental (inc S74 charges)	0.00	0.00	0.00	0.00	0.00	**0.00**	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*	***0.00***
Total	**0.35**	**2.73**	**3.92**	**5.85**	**6.08**	**18.93**	**0.44**	**0.88**	**5.92**	**6.76**	**8.66**	**22.66**

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