



#### SGN Standard Conditions - comments

We have no comments on the proposed changes to the Standard Conditions

#### SGN Standard Special Conditions - comments

Comment number	Para Ref in the statutory consultation	Comment
<b>Standard Special Condition A30. Regulatory Accounts</b>		
	<b>General</b>	Note that Standard Special Condition A29 Change of Financial Year is proposed to be deleted on the proviso that this is now included under A30. The provision for the licensee to change the Financial Year does not appear to have been inserted into A30.
	<b>2(a)</b>	<i>Closed brackets need to be inserted</i>
<b>Standard Special Condition A55. Data Assurance requirements paragraph</b>		
	<b>15 (a) (ii)</b>	As the over-arching paragraph (15 (a)) has been amended to only deal with instances when the DAG is modified, we do not believe references to issuing the DAG are required here. We therefore propose that “issued or (as the case may be)” and “issue or” are deleted so the subparagraph reads as follows:  <i>setting out the text of the DAG to be modified and the Authority’s reasons for proposing to modify it</i>

SGN Special Conditions - comments		
Comment number	Para Ref in the statutory consultation	Comment
<b>Special Conditions – General Comment</b>		
	1A, 3E & 4H	We have commented previously on our concern over the use of a number of definitions and terms with regards to Mains and Services Replacement Expenditure. We remain concerned with the inconsistency between Ofgem & HSE definitions and continue to believe that our comments in the covering letter of our response to the second informal licence drafting consultation remain valid. We strongly believe that a statement is required in the definition of 'Decommissioning' to make it clear that this is NOT to be read in the same way as the legal definition of 'decommissioning' provided by the HSE
		In special conditions 1B, 1C& 1D there are many odd 'j' that need to be deleted. We have tried to pick all of them up in the revision marked copy of the proposed licence conditions attached but would recommend a thorough review by Ofgem
<b>Special Condition 1A</b>		
	1A.4	The first definition should be 'Above Risk-action Threshold Tier 2 Mains'
	1A.4	The definition of Allowable NIA Expenditure appears to have some wording missing as it specifies 'either part B of Special Condition 1H ...' but no 'or'?
	1A.4	Average Specified rate: we continue to believe that the Sterling 12 month LIBOR is more appropriate
	1A.4	The definitions for Smart Metering Roll-out Costs and Specified Street Works Costs (provided under separate e-mail from Ofgem) both need 'as further clarified in the RIGs' deleted. There is no further clarification of these definitions required. Indeed a definition should NOT require further clarification otherwise it is not a definition
	1A.4	The definition of PCFM Variable Value needs 'a' changed to ;the'. See marked up word document attached
<b>Special Condition 1B</b>		
	1B.3	The Denominator 'N' in DRSt is not required: in years when DRSt is not due to be paid it will be zero anyway.
	1B.4	No definition of 'N', but see comment 2 above
	1B.15	Por <sub>t</sub> should be replaced with PRO <sub>t</sub>
<b>Special Condition 1C</b>		
	1C.15	See revision marked word document, there are crucial brackets missing from the formula
<b>Special Condition 1D</b>		
	1D.3	It has been inferred that the AEXt NTS Exit Capacity Allowances (Page 34, Appendix 1) would be reviewed in 15/16 and 18/19 to ensure that the allowances reflect a more current view of costs as we move through the price control period, this is not

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		stated in the licence.
	1D.3	Should read 'In Formula Years ...'
	1D.3	The { } brackets should be changed to ( ) brackets
	1D.6	Reference to Appendix 1 for NTSTVEv,t should refer to Appendix 2
	Appendix 1	Ofgem has identified an error with the AExt term for all GDNs (J Grayburn e-mail of 17 January). Our preference is that we use the NTS 1 April prices rather than FP figures
	Appendix 2	The NTS bookings for Scotland are missing the Avonmouth booking: this booking is 1.03M GWh pa - value £55k pa (NTS 13/14 cost).
<b>Special Condition 1E</b>		
	1E.4	The formula for BMt needs to be inflated by RPIAt-2
	1E.7	In the definition of CSASt, 'Licensee' needs to be inserted after 'means the..'
	1E.11	Replace the second 'for the unplanned supply interruptions' with 'that'.
	1E.12	First paragraph insert 'interruption' between 'unplanned supply' and 'performance'.
	1E.12	In the definition of CSBMXt insert 'interruption' between 'unplanned supply' and 'performance'.
	1E.13	First paragraph insert 'interruption' between 'unplanned supply' and 'performance'
	1E.34	Change in text 1E.34 to IE.33
	1E.35	Change in text 1E.35 to IE.34
	1E.36	Change in text 1E.36 to 1E.35c
	Appendix 1	The Value of CSOUt is in 2009/10 prices and this needs to be clearly stated in the title
	Appendix 2	The Value of CSODt is in 2009/10 prices and this needs to be clearly stated in the title. Should these figures be negative?
	Appendix 3	The Value of ARCMt is in 2009/10 prices and this needs to be clearly stated in the title
	Appendix 4	The Value of SEt is in 2009/10 prices and this needs to be clearly stated in the title
	Appendix 5	The Value of BMt is in 2009/10 prices and this needs to be clearly stated in the title. This maximum value erroneously excludes the interest values and the RPIAt-2 in the formula BMt
<b>Special Condition 1F</b>		
	1F.4	SHRRt needs to be adjusted for RPI & the time value of money in a similar manner to SHRAt to compensate for the two-year lag
	1F.4	I & T at the start of the definitions should be lower case

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Comment number	Para Ref in the statutory consultation	Comment
	1F.4	See note on Appendix 1 below
	1F.5	See revision marked word document, there are crucial brackets missing from the formula
	1F.9	EEIt needs to be adjusted for RPI & the time value of money in a similar manner to SHRAt to compensate for the two-year lag(in addition to the RPIAt-2 term currently applied)
	1F.10	Formula year should be 2020/21 (not 2021/22)
	Appendix 1	It has been inferred that the LDZ allowance in respect of shrinkage costs would be reviewed in 15/16 and 18/19 to ensure that the allowances reflect a more current view of costs as we move through the PCR, this is not reflected in the licence
	Appendix 1	The Shrinkage allowance must be expressed in £ (rather than £m) to ensure the SHRAt formula at 1F.4 works correctly
<b>Special Condition 1G</b>		
	1G.3	DRSXt needs to be adjusted for two years of interest
<b>Special Condition 1H</b>		
		No comments
<b>Special Condition 1I</b>		
	1I.14	This paragraph should refer to 1I.13 rather than 1I.14.
	1I.23	Defined terms need to be removed from this condition and replace those currently set out in 1A: Definitions. References to specific paragraphs currently in 1A are incorrect.
<b>Special Condition 2A</b>		
	General	We are disappointed that none of our comments made at the second informal licence drafting consultation have been taken onboard. We continue to believe that all of our comments are relevant and should be incorporated in the licence condition
<b>Special Condition 2B</b>		
		We are disappointed that none of our comments made at the second informal licence drafting consultation have been taken onboard. We continue to believe that all of our comments are relevant and should be incorporated in the licence condition
	2B.10	Should read 'Subject to paragraph 2B.2 ...'
	2B.13	If there a very significant error when calculating the previous MOD term this will be replicated in the next year's MOD calculation. It is unclear why any functional modification will not be taken in to account.
<b>Special Condition 3A</b>		

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Comment number	Para Ref in the statutory consultation	Comment
	3A.14 (e)	MAR has been correctly deleted from the formula at 3A.10 so it is unclear why it is noted here. It is not referenced in the Financial Handbook
<b>Special Condition 3B</b>		
	Appendix 1	The non-repex capitalisation rates are in line with the FP Financial Model and the PCFM but are not in line with the Opex and Capex split based on the Totex in the 'Cost Efficiency' FP doc, as highlighted in an email to Ofgem (Tony Doyle) on 18/1/2013. It is essential that this mismatch is corrected using the FP Totex values. The correct values are 33.69% for Scotland Gas Networks & 28.94% for Southern Gas Networks
<b>Special Condition 3C</b>		
<b>Special Condition 3D</b>		
	3D.1	'innovation' is a defined term and should read 'Innovation'
<b>Special Condition 3E</b>		
	General	We have commented previously on our concern over the use of a number of definitions and terms with regards to Mains and Services Replacement Expenditure. We remain concerned with the inconsistency between Ofgem & HSE definitions and continue to believe that our comments in the covering letter of our response to the second informal licence drafting consultation remain valid.
<b>Special Condition 3F</b>		
	General	There is no arrangements for the recovery of uncertain costs with regard to the 'one off' reopener for the Statutory (Scottish) Independent Undertakings laid out in Table 8.1 of the RIIO-GD1 Final Proposals – Finance and uncertainty supporting document. It is our view that a new licence condition (for Scotland Gas Networks only) is required to ensure that the intent of the Final Proposals can be implemented. We believe that such a licence condition could take a similar form to CRC18A of Scottish Hydro Electric Power Distribution's licence – Arrangements for the recovery of costs for an integrated plan to manage supply and demand on Shetland. We do need a clear commitment from Ofgem that such a condition will be developed. We would be happy to work with Ofgem in its development
	3F.14	Insert a space between 'window' and '('
	3F.20	Insert a space between 'window' and '('
<b>Special Condition 4A</b>		
	4A.4(e)	Disapplication Date is not a defined term – a definition needs to be added.

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Comment number	Para Ref in the statutory consultation	Comment
	4A.4(f)	Network is not a defined term – a definition needs to be added.
<b>Special Condition 4B</b>		
	4B.2	Delete ‘and’ after ‘Special Condition 1B’.
	4B.2	Change the listed paragraphs to ‘4B.3, 4B.4 and 4B.5’
	4B.6 (c) &(d)	These paragraphs are duplicates; one should be deleted.
<b>Special Condition 4C</b>		
	4C.10(b)	Delete the extra space between ‘the’ and ‘Act’.
<b>Special Condition 4D</b>		
		No comment
<b>Special Conditions 4E &amp; 4F</b>		
		Not applicable to SGN
<b>Special Condition 4G</b>		
	General	<p>Along with all other GDNs we have significant concerns with the requirement to bring forward a Methodology for Network output Measures common to all DN Operators before 1 April 2013. Please find attached a separate word document outlining our 9and other GDN) concerns and proposals for the common methodology</p> <p>With regards to the deliverables by 18 January 2013, we can confirm that:</p> <ul style="list-style-type: none"> <li>• Updated data tables (4.13) have been submitted for Scotland and Southern Networks,</li> <li>• Data for OLI/1 pipelines has been recalculated following a gap analysis by the GDNs using robust and auditable data. The health and criticality indices are consistent with the proposals submitted by the GDNs,</li> <li>• A consistent definition for criticality across SGN for all asset groups (with the exception of OLI/1 pipelines),</li> </ul> <p>The DN group will provide the following separately:</p> <ul style="list-style-type: none"> <li>• A cross GDN consistency check of all asset groups,</li> <li>• A detailed gap analysis of OLI/4 pipelines.</li> </ul>
	General	Capitalise ‘licensee’ throughout the condition.

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	4G.2	Delete the square brackets around 1 April 2013. Note however that (i) As the licence doesn't come into effect until 1 April 2013, this date cannot be used (usual convention is 'within X days of this licence condition coming into effect; and more importantly (ii) our general concerns noted above and in our separate paper
	Part D	Change 'part D' to 'Part D'.
	4G.7	Insert a comma after 'The licensee must..'
	4G.8(a)(i)	Delete the square brackets.
	4G.8(a)(ii)	Delete the square brackets.
	4G.12(a)	Change 'paragraph 4G.7(a)' to 'paragraph 4G.8(a).
	4G.15	Change 'capture' to 'captured'.
	4G.15	Change '..that they facilitate..' to '..that it facilitates'.
	4G.17(a)	Delete the extra space between 'the' and 'licensees'.
	4G.17(a)	Delete the extra space between 'the' and 'licensee's'.
	4G.18(c)	Delete the extra space between 'modification' and 'proposal'.
	4G.20	Direction should not be capitalised.
<b>Special Condition 4H</b>		
	4H.1	Delete the extra full stop at the end of the paragraph
	4H.2	Delete 'First' as this is not necessary given the definition of Price Control Period
	4H.2	Delete the extra full stop at the end of the paragraph
<b>Special Condition 4I</b>		
	General	This licence condition is relevant to SGN & WWU, it is not relevant to NGN or any other GDN
	4I.3	Delete this paragraph. We believe it is a 'cut and paste' from the amended NGGT C26 special condition (now 11F) but it is not relevant to SGN or WWU, neither GDN recovers amounts from gas shippers nor pays them to DN Operators or Relevant

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		Shippers. The purpose of special condition 4I is to ensure (a) that these two GDNs use reasonable endeavours for the transportation of LPG (and to provide the NTS operator with relevant information) and (b) that customers on the Independent Systems are not charged more than Equivalent Customers
	All other paragraphs	All other paragraphs will need to be re-numbered
	41.7	Change 'relevant premises' to 'Relevant Premises'
	41.8	Change 'relevant premises' to 'Relevant Premises'



SGN Gas Network Innovation Allowance Governance Document		
Comment number	Para Ref in the statutory consultation	Comment
1	General	We are concerned that a substantial number of comments submitted in response to the previous consultation remain and have not been taken in to consideration. The responses set out below therefore focus on the most important issues at this stage. We hope other issues will be considered at the update and review planned for 2013 and 2014.
2	Overview	The NIA Governance Document has been designed to set out the regulation, governance and administration arrangements relating to the application of the NIA. The document states clearly that Network Licensees are required to comply with the document as if it formed part of their licence. However the document also sets out that it has been developed to provide information and aid understanding of all interested parties. As set out in our previous response we are concerned that it is not always clear what is intended as an absolute obligation and what is intended as guidance only e.g. it uses language such as 'expect'. Given potential consequences if provisions are to be applied as if they formed part of the licence we urged that greater clarity was provided. We note the document now states that it is the responsibility of each Network Licensee to understand the provisions of this document and how they apply to them. We are disappointed that no further attempt has been made to provide clarity in the document. As such many of the previous comments made in relation to this point still stand. We would hope this would be considered when regulating Network Licensees under the NIA and when conducting the planned update in late 2014 and review in 2 years time. In particular, we would urge the date for review remains flexible so that lessons learned from the LCNF and early experience of the NIA can be taken in to account at the earliest opportunity as experience grows.
3	1.18	Last sentence should read 'intend' rather than 'intent'.
4	2.4	Second bullet is confusing.
5	2.10	As set out in previous comments, this sets out that Network Licensees must ensure Project details published on the Learning Portal are up to date at all times. As project details are continuously developing throughout the life of a Project we assume this simply means the most recent Project Progress information and Annual Summary must be up to date, rather than continuously updated as the Project moves on but this needs to be clear as the obligation could be extremely onerous if not.
6	3.4	This states that IFI projects can transfer to the NIA but for transparency they must comply with all NIA provisions. As set out in our previous response this may be difficult in some cases as IFI projects were developed on a different basis. We requested greater flexibility to maximise learning and value for money from IFI projects. We are disappointed that this has not been considered.
7	Specific requirements	As set out in our previous response we are concerned that the Network Licensee must be able to set out quite detailed and specific information e.g. how learning can be applied by all Relevant Network Licensees, potential value for money and

SGN Gas Network Innovation Allowance Governance Document		
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	set 2	benefits in relation to wider GB application. While we appreciate a common guide is to be developed to provide further clarity, we are concerned that as drafted this obligation could be extremely onerous. A degree of reasonableness and flexibility is required. The document goes on to state that until a guide is approved by the Authority only projects with “clear” monetary benefit s should be started. Given the nature of such Projects, the risk and uncertainty, even with a guide the difficulty associated with estimating or demonstrating GB benefits should not be underestimated and should only be considered as a guide.
	3.23	This uses the term Related Undertaking but this is not defined in Chapter 8.
	3.25 and 6.4	This sets out that where a Network Licensee or Project Partner is concerned that the release of information could cause harm and should be withheld, Ofgem should be informed. However the section continues to state the Authority may later determine this was unreasonable and NIA Expenditure up to the full value of the Project may be withheld. As set out in our previous response, we are concerned this introduces significant and unnecessary risk for the Network Licensee. If the Network Licensee was able to demonstrate at the start of the Project that it was appropriate to withhold information it is not appropriate to later reverse this decision. Concerns should be addressed at the start of the Project when the Network Licensee has the opportunity to take action.
	3.6	This should refer to gas rather than electricity.
	Table 3.1	Refers to electricity rather than gas e.g. RIIO-T1
	4.10	We believe the Data Protection requirements should apply to the Network Licensee(s) in the same way as the Customer Protection requirements, rather than the Funding Licensee.
	4.13	This sets out provisions relating to Eligible Bid Preparation Costs. We believe this should refer to Outstanding Funding Required rather than NIC funding requested, as set out in the NIC Governance Document. Also it refers to Electricity Transmission Group rather than gas.
	Page 22	The heading at the bottom of the page refers to RIIO-T1 but should be gas
	4.15	Should refer to gas rather than electricity.
	7.4	Knowledge should be restricted to Relevant Foreground IPR
	Defined Terms	The following terms are used in the document but not defined in Chapter 8: Definitions Related Undertaking (3.23) External Funding (table on page 17) Project Information Page (3.34)

SGN Gas Network Innovation Allowance Governance Document		
Comment number	Para Ref in the statutory consultation	Comment
		<p>Eligible NIA Project Expenditure (4.3)</p> <p>Allowable NIA Project Expenditure (4.11)</p> <p>NIA Project Registration Performa (Table 6.1)</p> <p>Related Undertaking</p> <p>As set out in our previous consultation response, we are also concerned that definitions do not mirror those set out in Licence and this could create unnecessary confusion.</p>

SGN Gas Network Innovation Competition Governance Document		
Comment number	Para Ref in the statutory consultation	Comment
1	General	We are concerned that a substantial number of comments submitted in response to the previous consultation remain and have not been taken in to consideration. The responses set out below therefore focus on the most important issues at this stage. We hope other issues will be considered at the planned review.
2	Overview	The NIC Governance Document has been designed to set out the regulation, governance and administration arrangements relating to the application of the NIC. The document states clearly that Network Licensees are required to comply with the document as if it formed part of their licence. However the document also sets out that it has been developed to provide information and aid understanding of all interested parties. As set out in our previous response we are concerned that it is not always clear what is intended as an absolute obligation and what is intended as guidance only e.g. it uses language such as 'expect'. Given potential consequences if provisions are to be applied as if they formed part of the licence we urged that greater clarity was provided. We note the document now states that it is the responsibility of each Network Licensee to understand the provisions of this document and how they apply to them. We are disappointed that no further attempt has

SGN Gas Network Innovation Competition Governance Document		
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		been made to provide clarity in the document. As such many of the previous comments made in relation to this point still stand. We would hope this would be considered when regulating Network Licensees under the NIC and when conducting the planned review. However we would also urge the date for review remains flexible so that lessons learned from the LCNF and early experience of the NIC can be taken in to account at the earliest opportunity as experience grows. As such it may be possible and deemed necessary to carry out a review after 1 year of operation rather than 2.
	2.10	As set out in previous comments, this sets out that Network Licensees must ensure Project details published on the Learning Portal are up to date at all times. As project details are continuously developing throughout the life of a Project we assume this simply means the most recent Project Progress Reports rather than continuously updated as the Project moves on.
	3.3	Greater clarity regarding intended dates would be helpful as 2 Calendar Months notice is extremely tight for Projects of this size and complexity.
	ISP Criteria – Page 18	As set out in our previous response we are concerned that the Network Licensee must be able to set out quite detailed and specific information to ‘demonstrate’ how the Project can accelerate development of low carbon and environmental benefits and the potential to deliver value for money for customers across GB. It is important that this is applied in a reasonable and flexible way. As stated for the NIA, it is important to recognise that given the nature of such Projects, the risk and uncertainty, the difficulty associated with demonstrating the elements outlined should not be underestimated.
	Evaluation Criteria – Page 32	Similar to above, the difficulties and uncertainty associated with the demonstrating a Project meets the criteria should not be underestimated. Details can be extremely uncertain and difficult to quantify e.g. potential to deliver net financial benefits, potential to release capacity and potential to replicate across GB.
	IPR - 9.4	It is not clear what is meant by ‘material’. This needs to be clearer, particularly if this is intended to be more than guidance.
	9.5	We suggest "(as appropriate)" be inserted after the word "shared" on the penultimate line.
	9.12	We recommend use of the words "new and distinct" in relation to the definition of Foreground IPR. .
		The term Participant is used throughout this section but only Project Participant is defined (and used elsewhere in the document).

SGN RIIO-GD1 Price Control Financial Handbook		
Comment number	Para Ref in the statutory consultation	Comment
	General	We are disappointed that most of our comments made at the second informal licence drafting consultation have not been taken onboard. We continue to believe that <u>all of our previous comments</u> are relevant and should be incorporated in the Financial Handbook and we reiterate a number of them below
Chapter 1		
	1.3	Point still stands from 27/11/12 submission that the formula should be the same as that for Base Revenue in 1B.5 - it is not appropriate to remove variables in formulae to simplify them.
	1.5	Comments from 27/11/12 submission on updating RPI forecasts for actuals in the PCFM model have not been taken into account.
	1.22	Compared with 1.19 of the previous financial handbook a provisional version of MOD will no longer be available with the provisional PCFM values. This is a backward step, it is very important for GDNs to be able to check that the MoD is being calculated as expected
	1.29	Comment from 27/11/12 submission has not been taken onboard: It is important that sufficient notice of issues to be discussed at the meeting is given - to ensure that the correct people are able to attend to make the decision.
Chapter 2		
		No comment
Chapter 3		
	Table 3.2	Row 7 – DR now states ‘... moderated against similar rates reported for occupational pension schemes in Great Britain’  We believe that it is more appropriate and representative for utility schemes to use the average of ENA members
	Table 3.2	Row 9, step (c) - there is a missing bracket in this formula
Chapter 4		
		No comment
Chapter 5		
	5.9	Unclear why the Breakeven figure has changed from ‘Bank of England’s breakeven inflation figure’ to ‘Ofgem’s imputed breakeven figure’.

SGN RIIO-GD1 Price Control Financial Handbook		
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	5.10	Our point from 27/11/12 submission of taking the average of the last and next day's trading data has not been taken onboard. We continue to believe this is the most appropriate approach
	5.11	We note some movement on our point from 27/11/12 submission that Ofgem should 'consult on alternatives if either the Licensees or Ofgem believe that the composition, or methodology, of calculating elements of the index materially changes.' However, it is unclear what a 'material change in the basis of the indices' means needs GDN input as well as Ofgem to decide if it is worth reviewing
Chapter 6		
	6.1 and 6.2	Base revenues have been set in the FP financial Model and PCFM using allowed costs that do not match those in the FP 'Cost Efficiency' doc. Thus base revenues have not been set on the basis that costs equals allowances and this needs to be corrected.
Chapter 7		
	7.13	This paragraph is not complete, it needs to reflect the latest definition of Smart Meter Roll-out Costs provided by Ofgem
Chapter 8		
		No comment
Chapter 9		
		No comment
Chapter 10		
	Paragraphs 10.1 to 10.19	We are disappointed that most of our comments made at the second informal licence drafting consultation have not been taken onboard. We continue to believe that, with the exception of our 'general' comment, are relevant and should be incorporated in the Financial Handbook.
	Part 4	Capex expenditure in the CAR and CRAV adjustments excludes Fuel Poor and SIU Costs; Capex and repex allowances used in the CAR calculations need to be adjusted for any re-openers in GDPCR1 e.g. TMA and MOD90
	10.72b	This paragraph needs to be reworded as follows: 'aggregating the amounts ascertained under sub-paragraph (a) on an NPV neutral basis – i.e. amounts relating to earlier years in the GDPCR period are given a time value of money adjustment, and <b>multiplying by the relevant capex incentive strength</b>
	10.72c	This paragraph needs to be reworded as follows: 'calculating the fast and slow money amounts that would have been included in or left out of GDPCR base revenues if contemporaneous adjustments had been made to the licensee's RAV

SGN RIIO-GD1 Price Control Financial Handbook		
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		balance to reflect underspend or overspend amounts'
	10.72e	This paragraph needs to be reworded as follows: 'subtracting the total obtained under sub-paragraph <b>(d)</b> from the total obtained under sub-paragraph <b>(b)</b> .'
	10.79 & 10.80	Capex and Repex should not be aggregated as they are inputted separately into the legacy workbook