

# Guidance

GT2 PCFM Guidance			
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This document provides instructions and guidance to licenced network operators to enable them to complete the reporting requirements associated with updating various variable values and performance data in the Price Control Financial Model (PCFM) during the Annual Iteration Process (AIP).

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<sup>1</sup> [Note: This guidance document is a work in progress (WIP) and the content is subject to further review and decisions. Square brackets [] are used to provide notes to the reader or to indicate items that cannot yet be added or are otherwise provisional.]

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## 1. Introduction

### Background

1.1. The PCFM Guidance provides network operators (licensees) with information on how to fill out the PCFM Variable Values and any underlying templates that feed into them, which they are required to submit to us for each Annual Iteration Process (AIP).

1.2. It also sets out the required information that should be submitted to Ofgem in the supporting narrative commentary.

1.3. This document should be read in conjunction with chapter 2 of the GT2 Price Control Financial Handbook, which contains a detailed description of the PCFM modification process and the AIP dry run process. Additionally, this document should be read in conjunction with Appendix 1 ('Glossary') of the GT2 Price Control Financial Handbook.

### Legal Framework

1.4. The modification and governance process for the Price Control Financial Model (PCFM) and Price Control Financial Handbook (PCFH), collectively known as the Price Control Financial Instruments, is set out in Special Condition 8.1 (*Governance of the GT2 Price Control Financial Instruments*).

1.5. The modification and governance process for the PCFM Guidance and the steps of the Annual Iteration Process are set out in Special Licence Condition 8.2 (*Annual Iteration Process for the GT2 Price Control Financial Model*).

### Purpose

1.6. The purpose of this document is to provide guidance to enable the licensee to complete each dry run of an AIP that is submitted to Ofgem. As described in GT2 Price Control Financial Handbook, dry run process entails amending and confirming values over a number of months,

from 31 July<sup>2</sup> to early November for each Regulatory Year, iterative to account for updates to the Variable Values as they become known.

1.7. This document provides information on:

- instructions and guidance on how to populate the PCFM Variable Values for submission for an Annual Iteration Process;
- guidance on the process and timeframe for reporting and submitting the required data; and
- any requirements that apply to supporting information, documentation or commentary to be submitted.

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<sup>2</sup> For the first year of RIIO-2, this date has been moved to 31 August 2021.

## 2. The Price Control Financial Model

### Background

2.1. We set ex-ante allowed revenues for each licensee at the outset of the RIIIO-2 price control based on the information available at the time.

2.2. Throughout the price control, we use the AIP to update the variable values in the PCFM by updating inputs for actual expenditure and performance as well as updating forecasts for the latest view.

2.3. The revenue calculation macro in the model is then re-run to capture this new information and to calculate an adjustment to allowed revenue ( $AR_t$ ) using the latest information.

2.4. This model and the re-calculated value of  $AR_t$  as well as the adjustment to revenue known as  $ADJR_t$  is published on Ofgem's website by 30 November each year and is the value that licensees must use to set their charges for the forthcoming Regulatory Year under special condition 2.1 (*Revenue restriction*).

### Model structure

2.5. The table below sets out the structure and contents of the sheets in the PCFM:

Sheet	Contents
Cover	Content directory and Model key
UserInterface	<p>This sheet contains company and year selector switch allowing the user to switch between companies and Regulatory Years.</p> <p>It also includes the "RunForOne" and "RunForAll" macro buttons, enabling the user to perform the model's recalculation function for either just the selected licensee or all licensees.</p>

Input	<p>The Input tab is the starting point for all calculations in the PCFM and contains all the inputs necessary to calculate all the components of AR<sub>t</sub>.</p> <p>The Input tab pulls from the eight identically structured company-specific input tabs at the end of the model, using a choose function, depending on which company is selected.</p>
Calculation sheets: Totex TIM Depn SystemOperator FuelPoor Return&RAV TaxPools Finance&Tax NonCore ReturnAdj Revenue AR SOAR	<p>The calculation sheets are purple sheets and will be auto-populated by the model when the inputs are updated for each AIP. The calculations within the majority of these sheets follow the algebra set out in the special licence conditions for the TO and SO.</p>
Results sheets	<p>The "LiveResults" sheet shows a live summary of the changes to the components of AR<sub>t</sub>, following any input updates. The values in this sheet update automatically following any changes to inputs to the year or company selector switch. This sheet shows results for the selected company.</p> <p>The "SavedResults" sheet hard-codes the values in the "LiveResults" sheet for comparison and record-keeping purposes, after the RunForOne or RunForAll macro has been run in the "UserInterface" sheet. This sheet shows the summary of results for all companies.</p>
Monthly Inflation input sheet Annual Inflation input sheet	<p>The "Monthly Inflation" sheet shows the values for monthly outturn and forecast price indices relating to the Retail Price Index (RPI), Consumer Price Inflation including owner-occupiers' housing costs (CPIH) and Price index (PI), as defined in chapter 2 of PCFH.</p>

	<p>The “Annual Inflation” sheet shows the derivation of annual indices and inflation rates by aggregating the data in the “Monthly Inflation” sheet.</p> <p>The inflation rates in the “Annual Inflation” sheet are used to derive “real to nominal” conversion factors used throughout the PCFM in relation to 2018/19 price base.</p>
NGGT TO NGGT SO	<p>The blue and grey shaded inputs, also known as the PCFM Variable Values, in each company-specific input sheet are the inputs, which should be updated as part of an AIP.</p> <p>These are the values that this guidance document pertains to, unless otherwise specified.</p>

## Subsidiary models

2.6. As well as the PCFM itself, licensees must submit a number of other templates and files, the values from which will feed into the PCFM Variable Values table. These include but are not limited to:

- Cost and Volumes Regulatory Reporting Pack<sup>3</sup>
- GT2 Revenue workbook<sup>4</sup>
- Tax workbook<sup>5</sup>

## Reporting timescales

2.7. The licensee must submit the PCFM, the required subsidiary models and commentary to the Authority by 31 August 2021 and by 31 July prior to each Regulatory Year t, thereafter.<sup>6</sup>

<sup>3</sup> Applicable to future Regulatory Years only (regulatory period starting 2022/23).

<sup>4</sup> The GT2 Revenue workbook is to be submitted for the submission due on 31 August 2021, only. In future periods, the calculations in this workbook will be moved into the Cost and Volume RRP.

<sup>5</sup> Applicable to future Regulatory Years only (regulatory period starting 2022/23).

<sup>6</sup> See the PCFM functional cut-off dates set out in Table 2.1 of the GT2 PCFH.



2.8. Ofgem will maintain up-to-date copies of and make any required modifications to the PCFM and its subsidiary models, the PCFH and the PCFM Guidance on an annual basis in accordance with the relevant governance processes set out in special conditions 8.1 and 8.2.

2.9. To allow licensees sufficient time to populate a PCFM for submission, modifications will be reflected in the version of the PCFM to be used for an upcoming AIP by 01 June 2021 and 01 May prior to each Regulatory Year, thereafter.<sup>6</sup>

2.10. There will be one or more dry runs of the PCFM between the licensee's initial submission of the PCFM and the final run in early November. The number of dry runs needed will depend on the number and timing of variable value updates required for the licensee in any particular Regulatory Year.

2.11. The AIP will be completed by 30 November prior to each Regulatory Year  $t$ , or as soon as is reasonably practicable thereafter. The deadline of 30 November reflects the need for the licensee to have confirmation of its Allowed Revenue in time to calculate and set its use of system charges.

2.12. The steps of the AIP are specified in Special Condition 8.2, Part A and the process is further described in the GT2 PCFH.

## Submissions

2.13. By 31 August 2021 and by 31 July prior to each Regulatory Year  $t$  thereafter<sup>7</sup>, the licensee must submit to the Authority the GT2 PCFM, with a completed variable values table (covering activity in the prior Regulatory Year and changes to forecast activity<sup>8</sup>), which has been run to calculate  $AR_t$ .

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<sup>7</sup> See the PCFM functional cut-off dates set out in Table 2.1 of the GD2 PCFH.

<sup>8</sup> Variable Values for Regulatory Years later than Regulatory Year  $t$  do not feed into the calculation of the term  $AR_t$ . Therefore, calculated values in the PCFM for Regulatory Years later than Regulatory Year  $t$  represent only a forecast. This is without prejudice to the status of the Variable Values concerned, which may have been decided and/or directed under licence conditions and which may or may not be subject to subsequent revision.

2.14. As well as this, the licensee must submit the relevant subsidiary models used to derive the variable values and any relevant commentary.

2.15. All of the documents submitted as part of a dry run of the AIP must be sent to the Authority either through email or a secure file-sharing application such as Huddle.

## Forecasting

2.16. The AIP allows for PCFM Variable Values to be updated during the course of the price control for outturn actual data as well as forecast data.

2.17. Where a PCFM Variable Value is not known at the time of submission, we expect the licensee to forecast a value using its best estimate under Special Condition 8.2.

2.18. It is acknowledged that forecasts will not be as accurate as actual reported data and that all forecasts will be made with a view to truing-up at a subsequent dry run or AIP, however we expect that the inclusion of forecasts will reduce the magnitude of any subsequent true-ups and reduce revenue volatility.

## Price base

2.19. As described in chapter 2 of the GT2 PCFH, when ascertaining calculated revenue, the GT2 PCFM works in a constant 2018/19 price base except in respect of some calculations internal to the model that use nominal prices, eg, tax and legacy calculations.

2.20. The price base for each PCFM Variable Value is set out in the PCFM input sheets, for the avoidance of doubt.

## Related documents

GT2 Price Control Financial Handbook

GT2 Price Control Financial Model

GT2 Regulatory Instructions and Guidance (RIGs)

GT2 Regulatory Financial Performance Reporting

Other relevant Associated Documents as listed in [Table 3.1](#) and [Table 3.2](#)

### 3. The GT2 Price Control Financial Model Variable Values

3.1. The variable values that can be revised during an AIP are set out in Table 3.1 below, and are also included as part of the PCFH.

3.2. For each variable value, the table provides a description, cross-references to the relevant Special Condition(s) (where appropriate), and details of Associated Documents (where relevant). It identifies a list of variable values in PCFM for which further guidance is provided either in this document or the Regulatory Instructions and Guidance (RIGs) as applicable.

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**Table 3.1 - RIIO-GT2 variable values (VV) for TO**

VV	Description	SpC	Cross-reference / Associated Document
<b>Variant Totex Allowances - PCDs</b>			
NARM <sub>t</sub>	Baseline Allowed NARM Expenditure	SpC 3.1	PCFM Guidance, Network Asset Risk Workbook, NARM Handbook
PSUP <sub>t</sub>	Physical security Price Control Deliverable	SpC 3.4	PCFM Guidance, Re-opener Guidance and Application Requirements
BTR <sub>t</sub>	Bacton terminal site redevelopment Price Control Deliverable	SpC 3.10	PCFM Guidance, PCD Reporting Requirements and Methodology Document
KLS <sub>t</sub>	King's Lynn subsidence Price Control Deliverable	SpC 3.12	PCFM Guidance, Re-opener Guidance and Application Requirements
NLA <sub>t</sub>	Asset health - non lead assets Price Control Deliverable	SpC 3.15	PCFM Guidance, PCD Reporting Requirements and Methodology Document
CEP <sub>t</sub>	Compressor emissions Price Control Deliverable	SpC 3.11	PCFM Guidance, Re-opener Guidance and Application Requirements
RA <sub>t</sub>	Redundant Assets Price Control Deliverable	SpC 3.16	PCFM Guidance, PCD Reporting Requirements and Methodology Document
FIOC <sub>t</sub>	Funded incremental obligated capacity Price Control Deliverable	SpC 3.13	PCFM Guidance, Re-opener Guidance and Application Requirements
CROT <sub>t</sub>	Cyber Resilience OT Price Control Deliverable and use it or lose it allowance	SpC 3.2	PCFM Guidance
CRIT <sub>t</sub>	Cyber Resilience IT Price Control Deliverable	SpC 3.3	PCFM Guidance, Re-opener Guidance and Application Requirements
RDF <sub>t</sub>	Net Zero And Re-opener Development Fund use it or lose it allowance	SpC 3.5	PCFM Guidance, Re-opener Guidance and Application Requirements
<b>Variant Totex Allowances - UMs</b>			
NARMAH <sub>t</sub>	NARM Asset Health Re-opener	SpC 3.1	PCFM Guidance, Re-opener Guidance and Application Requirements
NOIT <sub>t</sub>	Non-operational IT Capex Re-opener	SpC 3.7	PCFM Guidance, Re-opener Guidance and Application Requirements
CAM <sub>t</sub>	Coordinated Adjustment Mechanism Re-opener	SpC 3.8	PCFM Guidance, Re-opener Guidance and Application Requirements

NZ <sub>t</sub>	Net Zero Re-Opener	SpC 3.6	PCFM Guidance, Re-opener Guidance and Application Requirements
AH <sub>t</sub>	Asset health Re-Opener	SpC 3.14	PCFM Guidance, Re-opener Guidance and Application Requirements
NLAAH <sub>t</sub>	Asset Health - Non Lead Assets Reopener	SpC 3.15	PCFM Guidance, Re-opener Guidance and Application Requirements
QL <sub>t</sub> and PD <sub>t</sub>	Uncertain Costs Re-opener	SpC 3.17	PCFM Guidance, Re-opener Guidance and Application Requirements
NZP <sub>t</sub>	Net zero Pre-construction Work and Small Net Zero Projects Re-opener	SpC 3.9	PCFM Guidance, Net Zero Pre-construction Work and Small Net Zero projects Re-opener Governance Document
BTRE <sub>t</sub>	Bacton terminal site redevelopment Price Control Deliverable - Re-Opener Element	SpC 3.10	PCFM Guidance, Re-opener Guidance and Application Requirements
PSUPRE <sub>t</sub>	Physical Security Price Control Deliverable - Re-Opener Element	SpC 3.4	PCFM Guidance, Re-opener Guidance and Application Requirements
CEPRE <sub>t</sub>	Compressor Emissions Price Control Deliverable - Re-Opener Element	SpC 3.11	PCFM Guidance, Re-opener Guidance and Application Requirements
CROTRE <sub>t</sub>	Cyber resilience OT (non-TIM) Price Control Deliverable - Re-Opener Element	SpC 3.2	PCFM Guidance, Re-opener Guidance and Application Requirements
CRITRE <sub>t</sub>	Cyber resilience IT (TIM) Price Control Deliverable - Re-Opener Element	SpC 3.3	PCFM Guidance, Re-opener Guidance and Application Requirements
KLSRE <sub>t</sub>	King's Lynn subsidence Price Control Deliverable - Re-Opener Element	SpC 3.12	PCFM Guidance, Re-opener Guidance and Application Requirements
FIOCRE <sub>t</sub>	Funded Incremental Obligated Capacity Price Control Deliverable - Re-Opener Element	SpC 3.13	PCFM Guidance, Re-opener Guidance and Application Requirements, Guidance on the Incremental Obligated Capacity Re-opener
OE <sub>t</sub>	Opex Escalator	SpC 3.18	PCFM Guidance

**Actual Totex**

Capitalisation rate 1:			
ALC	Actual load related capex expenditure		PCFM Guidance
ARC	Actual asset replacement capex expenditure		PCFM Guidance
AOC	Actual other capex expenditure		PCFM Guidance
ACO	Actual non-load (opex)		PCFM Guidance
AIO	Actual indirects (opex)		PCFM Guidance
ANC	Actual non-operational capex		PCFM Guidance
Capitalisation rate 2:			
ALCU	Actual load related capex expenditure		PCFM Guidance

ARCU	Actual asset replacement capex expenditure		PCFM Guidance
AOCU	Actual other capex expenditure		PCFM Guidance
ACOU	Actual non-load (opex)		PCFM Guidance
AIOU	Actual indirects (opex)		PCFM Guidance
ANCU	Actual non-operational capex		PCFM Guidance
<b>Pass-through expenditure</b>			
RB <sub>t</sub>	Prescribed Rates	SpC 6.1, Part B	PCFM Guidance
LF <sub>t</sub>	Licence Fees	SpC 6.1, Part A	PCFM Guidance
EDE <sub>t</sub>	Pension deficit charge	SpC 6.1, Part A	PCFM Guidance
BD <sub>t</sub>	Bad Debt	SpC 6.1, Part C	PCFM Guidance
OPTC <sub>t</sub>	Secretary of State in respect of Policing Costs	SpC 6.1, Part A	PCFM Guidance
IS <sub>t</sub>	Gas conveyed to Independent Systems (SIU)	SpC 6.2	PCFM Guidance
PTV <sub>t</sub>	PARCA Termination Value	SpC 6.1, Part D	PCFM Guidance
Hy <sub>t</sub>	Hy-Net	SpC 6.1, Part E	PCFM Guidance
NZPS <sub>t</sub>	Distribution Networks' Net Zero Pre-construction Work and Small Net Zero Projects Re-opener	SpC 6.1, Part F	PCFM Guidance
<b>Incentive Revenue</b>			
CSI <sub>t</sub>	Customer satisfaction incentive	SpC 4.2	PCFM Guidance
ESI <sub>t</sub>	Environmental scorecard output delivery incentive	SpC 4.3	PCFM Guidance
<b>Other Revenue Allowances</b>			
NIA <sub>t</sub>	RIIO-2 Network Innovation Allowance	SpC 5.2	PCFM Guidance, RIIO-2 NIA Governance Document
CNIA <sub>t</sub>	Carry-over RIIO-1 Network Innovation Allowance	SpC 5.3	PCFM Guidance, RIIO-1 NIA Governance Document
SIF <sub>t</sub>	Strategic Innovation Fund	SpC 5.7	SIF Governance Document, PCFM Guidance
<b>Legacy Adjustments</b>			
LPT <sub>t</sub>	Legacy pass-through	SpC 7.2	PCFH section 8, PCFM Guidance

LMOD <sub>t</sub>	Legacy MOD	SpC 7.3	PCFH section 8, PCFM Guidance
LK <sub>t</sub>	Legacy K Correction	SpC 7.4	PCFH section 8, PCFM Guidance
LTRU <sub>t</sub>	Legacy TRU term	SpC 7.5	PCFH section 8, PCFM Guidance
NOCO <sub>t</sub>	Close out of the RIIO-GT1 network outputs	SpC 7.6	PCFH section 8, PCFM Guidance
NICF <sub>t</sub>	RIIO-1 network innovation competition	SpC 7.7	PCFH section 8, PCFM Guidance
SSCO <sub>t</sub>	Close out of the RIIO-GT1 stakeholder satisfaction output	SpC 7.8	PCFH section 8, PCFM Guidance
LRAV <sub>t</sub>	RIIO-1 net RAV additions (after disposals)	SpC 7.9	PCFH section 8, PCFM Guidance
<b>Directly Remunerated Services</b>			
PREDRS <sub>t</sub>	Pre-vesting directly remunerated services	SpC 9.7	PCFM Guidance
POSDRS <sub>t</sub>	Post-vesting directly remunerated services	SpC 9.7	PCFM Guidance
OIDRS <sub>t</sub>	Other income from directly remunerated services	SpC 9.7	PCFM Guidance
IDRS <sub>t</sub>	Identified directly remunerated services costs	SpC 9.7	PCFM Guidance
<b>Finance Inputs</b>			
RFR	Risk-free rate		PCFH section 4, PCFM Guidance
iBTA <sub>t</sub>	iBoxx trailing average		PCFH section 4, PCFM Guidance
I <sub>j</sub>	Sterling Overnight Index Average (SONIA)	SpC 1.1, Part B	PCFH section 2, PCFM Guidance
RPE <sub>t</sub>	RPE annual growth		PCFM Guidance
AND <sub>t</sub>	Adjusted net debt		PCFM Guidance
TDNI <sub>t</sub>	Tax deductible net interest cost		PCFM Guidance
TAXA <sub>t</sub>	Tax allowance adjustment	SpC 2.2	PCFH section 6, PCFM Guidance
TTE <sub>t</sub>	Tax liability allowance adjustments - driven by tax trigger events		PCFH section 6, PCFM Guidance
OGP <sub>t</sub>	General pool capital allowance opening balance brought forward		PCFM Guidance
OSRP <sub>t</sub>	Special Rate capital allowance opening balance brought forward		PCFM Guidance
OSBP <sub>t</sub>	Structures and buildings capital allowance opening balance brought forward		PCFM Guidance
ODRP <sub>t</sub>	Deferred revenue expenditure opening balance brought forward		PCFM Guidance
LODRP <sub>t</sub>	Deferred revenue pool additions (RIIO1) plus opening balance at start of RIIO1		PCFM Guidance
OTL <sub>t</sub>	Tax loss brought forward		PCFM Guidance
ARGP <sub>t</sub>	Totex allocation to "General" tax pool		PCFM Guidance

ARSR <sub>t</sub>	Totex allocation to "Special Rate" tax pool		PCFM Guidance
ARSB <sub>t</sub>	Totex allocation to "Structures and Buildings" tax pool		PCFM Guidance
ARDR <sub>t</sub>	Totex allocation to "Deferred Revenue" tax pool		PCFM Guidance
ARR <sub>t</sub>	Totex allocation to "Revenue" tax pool		PCFM Guidance
ARNQ <sub>t</sub>	Totex allocation to "Non Qualifying" tax pool		PCFM Guidance
CT <sub>t</sub>	Corporation tax rate		PCFM Guidance
GCA <sub>t</sub>	General pool capital allowance rate		PCFM Guidance
SRCA <sub>t</sub>	Special Rates capital allowance rate		PCFM Guidance
SBCA <sub>t</sub>	Structures and buildings capital allowance rate		PCFM Guidance
DRCA <sub>t</sub>	Deferred Revenue Expenditure capital allowance rate		PCFM Guidance
RIIO-1 AR <sub>t</sub>	RIIO-1 allowed revenue		PCFM Guidance
PRP <sub>t</sub>	Penal rate proportion	SpC 2.1 Part H	PCFM Guidance
RR <sub>t</sub>	Recovered revenue	SpC 2.1, Part B	PCFM Guidance

**Table 3.2 - RIIO-GT2 variable values (VV) for SO**

VV	Description	SpC	Cross-reference / Associated Document
<b>Variant Totex Allowances - PCDs</b>			
FIOC <sub>t</sub>	Funded Incremental Obligated Capacity Price Control Deliverable	SpC 3.13	PCFM Guidance, Guidance on the Incremental Obligated Capacity Re-opener
CROT <sub>t</sub>	Cyber resilience OT (non-TIM) Price Control Deliverable	SpC 3.2	PCFM Guidance, PCD Reporting Requirements and Methodology Document
CRIT <sub>t</sub>	Cyber resilience IT (TIM) Price Control Deliverable	SpC 3.3	PCFM Guidance, PCD Reporting Requirements and Methodology Document
<b>Variant Totex Allowances - UMs</b>			
CROTRE <sub>t</sub>	Cyber resilience OT (non-TIM) Price Control Deliverable - Re-Opener Element	SpC 3.2	PCFM Guidance, Re-opener Guidance and Application Requirements
CRITRE <sub>t</sub>	Cyber resilience IT (TIM) Price Control Deliverable - Re-Opener Element	SpC 3.3	PCFM Guidance, Re-opener Guidance and Application Requirements
NZ <sub>t</sub>	Net Zero Re-Opener	SpC 3.6	PCFM Guidance, Re-opener Guidance and



VV	Description	SpC	Cross-reference / Associated Document
			Application Requirements
FIOCRE <sub>t</sub>	Funded Incremental Obligated Capacity Price Control Deliverable - Re-Opener Element	SpC 3.13	PCFM Guidance, Re-opener Guidance and Application Requirements, Guidance on the Incremental Obligated Capacity Re-opener
NOIT <sub>t</sub>	Non-operational IT Capex Re-opener	SpC 3.7	PCFM Guidance, Re-opener Guidance and Application Requirements
OE <sub>t</sub>	Opex Escalator	SpC 3.18	PCFM Guidance
<b>Actual Totex</b>			
SOANC	Actual non-operational capex		PCFM Guidance
SOACO	Actual controllable opex		PCFM Guidance
<b>Pass-through expenditure</b>			
SOEDE <sub>t</sub>	Pension Scheme Established Deficit		PCFM Guidance, PCFH Section 7
SOBD <sub>t</sub>	System operator bad debt	SpC 6.3, Part B	PCFM Guidance
CDSP <sub>t</sub>	CDSP Costs, excluding costs incurred in relation to UK Link Gemini	SpC 6.3, Part A	PCFM Guidance
<b>Other Revenue</b>			
CMIR <sub>t</sub>	Constraint management incentive revenue	SpC 5.5, Part B	PCFM Guidance
RAREnCA <sub>t</sub>	Revenue from accelerated release of incr. obl. entry capacity	SpC 5.5, Part A	PCFM Guidance
ExBBCNLRA <sub>t</sub>	Exit capacity buyback cost which users are liable to reimburse	SpC 5.5, Part A	PCFM Guidance
RBC <sub>t</sub>	Revenue for net residual balancing costs	SpC 5.6, Part A	PCFM Guidance
OMC <sub>t</sub>	Total costs for procurement of operating margin services	SpC 5.6, Part A	PCFM Guidance
SC <sub>t</sub>	System costs	SpC 5.6, Part A	PCFM Guidance
RBIR <sub>t</sub>	Residual balancing incentive	SpC 5.6, Part B	PCFM Guidance

VV	Description	SpC	Cross-reference / Associated Document
QDAIR <sub>t</sub>	Quality of demand forecasting incentive revenue	SpC 5.6, Part C	PCFM Guidance
GHGIR <sub>t</sub>	Green house gas emissions incentive	SpC 5.6, Part D	PCFM Guidance
MIR <sub>t</sub>	Maintenance incentive	SpC 5.6, Part F	PCFM Guidance
<b>Legacy Adjustments</b>			
SOLMOD <sub>t</sub>	System Operator legacy MOD	SpC 7.11	PCFH section 8, PCFM Guidance
SOLK <sub>t</sub>	System Operator legacy K correction	SpC 7.12	PCFH section 8, PCFM Guidance
SOLTRU <sub>t</sub>	System Operator legacy TRU term	SpC 7.13	PCFH section 8, PCFM Guidance
LCMIR <sub>t</sub>	Close out of the RIIO-GT1 entry and exit capacity constraint management incentive	SoC 7.14	PCFH section 8, PCFM Guidance
LCMCA <sub>t</sub>	Close out of the RIIO-GT1 constraint management cost adjustment	SpC 7.15	PCFH section 8, PCFM Guidance
LTSS <sub>t</sub>	Close out of the RIIO-GT1 NTS transportation support services cost adjustment	SpC 7.16	PCFH section 8, PCFM Guidance
SOLRAV <sub>t</sub>	RIIO-1 net RAV additions (after disposals)	SpC 7.17	PCFH section 8, PCFM Guidance
<b>Finance Inputs</b>			
SORFR	Risk-free rate		PCFH section 4, PCFM Guidance
iBTA <sub>t</sub>	iBoxx trailing average		PCFH section 4, PCFM Guidance
I <sub>j</sub>	Sterling Overnight Index Average (SONIA)	SpC 1.1, Part B	PCFH section 2, PCFM Guidance
RPE <sub>t</sub>	RPE <sub>t</sub> indexation		PCFM Guidance
AND <sub>t</sub>	Adjusted net debt		PCFM Guidance
TDNI <sub>t</sub>	Tax deductible net interest cost		PCFM Guidance
SOTAXA <sub>t</sub>	Tax allowance adjustment	SpC 2.4	PCFH section 6, PCFM Guidance
SOTTE <sub>t</sub>	Tax liability allowance adjustments - driven by tax trigger events		PCFH section 6, PCFM Guidance
SOOGP <sub>t</sub>	General pool capital allowance opening balance brought forward		PCFM Guidance
SOOSRP <sub>t</sub>	Special Rate capital allowance opening balance brought forward		PCFM Guidance
SOOSBP <sub>t</sub>	Structures and buildings capital allowance opening balance brought forward		PCFM Guidance

VV	Description	SpC	Cross-reference / Associated Document
SOODRP <sub>t</sub>	Deferred revenue expenditure opening balance brought forward		PCFM Guidance
SOLODRP <sub>t</sub>	Deferred revenue pool additions (RIIO1) plus opening balance at start of RIIO1		PCFM Guidance
SOOTL <sub>t</sub>	Tax loss brought forward		PCFM Guidance
SOARGP <sub>t</sub>	Allocation to "General" tax pool		PCFM Guidance
SOARSR <sub>t</sub>	Allocation to "Special Rate" tax pool		PCFM Guidance
SOARR <sub>t</sub>	Totex allocation to "Revenue" tax pool		
SOARSB <sub>t</sub>	Allocation to "Structures and Buildings" tax pool		PCFM Guidance
SOARDR <sub>t</sub>	Totex allocation to "Deferred revenue" tax pool		PCFM Guidance
SOARNQ <sub>t</sub>	Allocation to "Non Qualifying" tax pool		PCFM Guidance
SOCT <sub>t</sub>	Corporation tax rate		PCFM Guidance
SOGCA <sub>t</sub>	General pool allowance rate		PCFM Guidance
SOSRCA <sub>t</sub>	Special Rate allowance rate		PCFM Guidance
SOSBCA <sub>t</sub>	Structures and buildings allowance rate		PCFM Guidance
SODRCA <sub>t</sub>	Deferred revenue expenditure allowance rate		PCFM Guidance
RIIO-1SOAR <sub>t</sub>	RIIO-1 allowed revenue		
SOPRP <sub>t</sub>	Penal rate proportion	SpC 2.3 Part G	
SORR <sub>t</sub>	Recovered revenue	SpC 2.3, Part B	PCFM Guidance

## 4. Instructions for completing the PCFM Variable Value table

4.1. The below table contains instructions for licensees on how to populate the PCFM Variable Values table for submission to the Authority at each dry run of an AIP.

4.2. Unless otherwise specified, all row and cell references relate to the licensee input sheets of the RIIO-GT2 PCFM.

4.3. Where the guidance refers to cost or other data that links to the GT2 Revenue workbook from the Cost and Volumes Regulatory Reporting Pack (C&V RRP), these values should be directly input into the GT2 Revenue workbook for the PCFM submission due on August 31<sup>st</sup> 2021.

4.4. The first submission of the RIIO-2 Cost and Volumes RRP will be in July 2022 and so for the first PCFM submission in August 2021, the Cost and Volume file will not be available. In the absence of this file, the licensee should enter its best estimate of forecast cost and output data into the yellow input cells of the GT2 Revenue workbook to calculate the PCFM Variable Values that will be included in the November 2021 AIP.

4.5. The contents of the GT2 Revenue workbook will be included within the Cost and Volumes RRP in all future Regulatory Years along with the required guidance for the underlying inputs, which will be included in the RIGs.

Variable Value category	Guidance for Completion
<p><b><u>Variant Totex Allowances – Price Control Deliverables (PCDs)</u></b></p> <p>TO:</p> <ul style="list-style-type: none"> <li>Baseline Allowed NARM Expenditure</li> <li>Physical security Price Control Deliverable</li> <li>Bacton terminal site redevelopment Price Control Deliverable</li> </ul>	<p>In general, the value of the Price Control Deliverable is an ex-ante allowance, subtracting any reductions that have been directed by the Authority.</p> <p>The ex-ante allowances are given in the appendix for the relevant Special Condition, and the reductions are provided by directions from the Authority.</p> <p>For the Variable Values in rows 20:30 and rows 18:21 for TO and SO respectively, the actual</p>

<ul style="list-style-type: none"> <li>• King's Lynn subsidence Price Control Deliverable</li> <li>• Asset health - non lead assets Price Control Deliverable</li> <li>• Compressor emissions Price Control Deliverable</li> <li>• Redundant Assets Price Control Deliverable</li> <li>• Funded incremental obligated capacity Price Control Deliverable</li> <li>• Cyber Resilience OT Price Control Deliverable and use it or lose it allowance</li> <li>• Cyber Resilience IT Price Control Deliverable</li> <li>• Net Zero And Re-opener Development Fund use it or lose it allowance</li> </ul> <p>SO:</p> <ul style="list-style-type: none"> <li>• Funded incremental obligated capacity Price Control Deliverable</li> <li>• Cyber resilience OT Price Control Deliverable and use it or lose it allowance</li> <li>• Cyber Resilience IT Price Control Deliverable</li> </ul>	<p>adjustments directed by Ofgem should be input into the yellow adjustment cells in the "TO PCDs" and "SO PCDs" sheets. This data will then be picked up in the allowance values on the TO and SO PCFM Input Summary sheets, which should be used to populate the PCFM.</p> <p><b>Forecasting</b></p> <p>Where Ofgem has yet to issue any directions, but a licensee expects not to deliver an output identified in the relevant Special Condition appendices, they should use best endeavours to forecast the expected adjustment into the yellow adjustment cells in the "TO PCDs" and "SO PCDs" sheets.</p> <p>Details of the assumptions made should be provided in the supplementary commentary.</p>
<p><b><u>Variant Totex Allowances – Re-openers</u></b></p> <p>TO:</p> <ul style="list-style-type: none"> <li>• NARM Asset Health Re-opener</li> <li>• Non-operational IT Capex Re-opener</li> </ul>	<p>A re-opener is a type of uncertainty mechanism, which allows the Authority to adjust a licensee's allowances (either up or down) based on an application by the licensee, in response to changing circumstances during the price control period.</p>

<ul style="list-style-type: none"> <li>• Coordinated adjustment mechanism Re-opener</li> <li>• Net zero Re-opener</li> <li>• Asset health Re-opener</li> <li>• Asset health – non lead assets Re-opener</li> <li>• Uncertain Costs Re-opener</li> <li>• Net Zero Pre-construction Work and Small Net Zero Projects Re-opener</li> <li>• Bacton terminal site redevelopment Re-Opener</li> <li>• Physical Security Re-Opener</li> <li>• Compressor emissions Re-Opener</li> <li>• Cyber Resilience OT Re-Opener</li> <li>• Cyber Resilience IT Re-Opener</li> <li>• King's Lynn subsidence Re-Opener</li> <li>• Funded incremental obligated capacity Re-Opener</li> </ul> <p>SO:</p> <ul style="list-style-type: none"> <li>• Cyber Resilience OT Re-Opener</li> <li>• Cyber Resilience IT Re-Opener</li> <li>• Net Zero Re-opener</li> <li>• Funded incremental obligated capacity Re-opener</li> <li>• Non-operational IT Capex Re-opener</li> </ul>	<p>The ex-ante allowances are given in the appendix for the relevant Special Condition, and the adjustments are provided by directions from the Authority.</p> <p><b>Within the application window</b></p> <p>For the Variable Values in rows 34:48 and rows 22:27 for TO and SO respectively, where actual amounts are known at the time of the dry run, ie, where a decision has already been made on a reopener application, the licensee must use the adjustment values as published by the Authority to update the relevant re-opener allowance and adjustment yellow input cells in the "TO Re-openers" and "SO Re-openers" sheets. This data will then be picked up in the allowance values on the TO and SO PCFM Input Summary sheets, which should be used to populate the PCFM.</p> <p>Where an application has been submitted but no decision has been made, the licensee must use the adjustment values as published in any minded-to position by the Authority. Where no minded-to position has been published, the licensee may use the same values included in its application or the actual costs incurred in the Regulatory Year, whichever is lower.</p> <p>This is with a view to updating these values at a later dry run (or AIP) to correspond to a subsequent Ofgem decision.</p> <p><b>Outside of the application window</b></p> <p>The licensee may choose to update its re-opener allowance Variable Values using forecast data ahead of any relevant re-opener window. This should be done by updating the yellow</p>
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	<p>adjustment and allowance cells in the "TO Re-openers" and "SO Re-openers" sheets.</p> <p>The values to use are the actual costs incurred or forecast costs expected to be incurred in each Regulatory Year and applied for through the relevant re-opener and the adjusted allowance should be based on the information that the licensee has provided in the "Re-opener pipeline log", which will be included in the GT2 Cost and Volumes RRP.</p> <p>Any supporting justification should be provided in addition to the log as per the re-opener guidance specified in the GT RIGs.</p>
<p><b><u>Opex Escalator</u></b></p> <p>TO:</p> <ul style="list-style-type: none"> <li>• Opex Escalator</li> </ul> <p>SO:</p> <ul style="list-style-type: none"> <li>• SO Opex Escalator</li> </ul>	<p>The opex escalator provides an additional allowance for any capital expenditure incurred on the eligible re-openers listed in SpC 3.18 (Opex escalator).</p> <p>For the Variable Values in row 49 and row 28 for TO and SO respectively, actual and forecast data should be input into the yellow input cells in the "Opex Escalator" sheet of the GT2 Revenue workbook.</p> <p>The value to input should be the capex element of any actual or forecast expenditure for each of the eligible re-openers within the UMTERMt term calculation, as reported in the "Re-opener pipeline log", which will be included within the GT2 Cost and Volumes RRP.</p> <p>This data is then picked up in the allowance values on the TO and SO PCFM Input Summary</p>

	<p>sheets, which should be used to populate the PCFM.</p>
<p><b><u>Actual Totex</u></b></p> <p>TO:</p> <p><i>Capitalisation rate 1:</i></p> <ul style="list-style-type: none"> <li>• Actual load related capex expenditure</li> <li>• Actual asset replacement capex expenditure</li> <li>• Actual other capex expenditure</li> <li>• Actual non-load (opex)</li> <li>• Actual indirects (opex)</li> <li>• Actual non-operational capex</li> </ul> <p><i>Capitalisation rate 2:</i></p> <ul style="list-style-type: none"> <li>• Actual load related capex expenditure</li> <li>• Actual asset replacement capex expenditure</li> <li>• Actual other capex expenditure</li> <li>• Actual non-load (opex)</li> <li>• Actual indirects (opex)</li> <li>• Actual non-operational capex</li> </ul> <p>SO:</p> <ul style="list-style-type: none"> <li>• Actual non-operational capex</li> <li>• Actual controllable opex</li> </ul>	<p>Totex is reported in one of two buckets, capitalisation rate 1 and capitalisation rate 2.</p> <p>Any expenditure relating to ex-ante, or baseline funded activities including PCDs is subject to capitalisation rate 1.</p> <p>Any expenditure relating to activities that have been funded under Uncertainty Mechanisms (as labelled in the PCFM) is subject to capitalisation rate 2.</p> <p>For the values in rows 59:73 and row 38:39 for TO and SO respectively, actual data for the reporting period in question should be input directly into the TO and SO PCFM Input Summary sheets, which should be used to populate the PCFM.</p> <p><b>Forecasting</b></p> <p>Forecasts for future regulatory periods should be input directly into the TO and SO PCFM Input Summary sheets, which should be used to populate the PCFM.</p>
<p><b><u>Pass through costs</u></b></p> <p>TO:</p> <ul style="list-style-type: none"> <li>• Bad Debt</li> </ul> <p>SO:</p> <ul style="list-style-type: none"> <li>• SO Bad Debt</li> </ul>	<p>Bad debt costs relate to any amounts that are incurred (or forecast) by the licensee due to network charges owed to it by one or more defaulting gas shippers and are treated as pass-through under SpC 6.1 (Transportation owner pass-through items) and SpC 6.3 (System operator pass-through items).</p>



	<p>Values should be input into the yellow input cells of the bad debt section of the "TO PT" and "SO PT" sheets. This data is then picked up in the TO and SO PCFM Input Summary sheets, which should be used to populate the PCFM.</p> <p>The <i>Provisional Bad Debt cost</i> should include the Bad Debt costs that the licensee expects to incur including any RIIO-GT1 Bad Debt and COVID-19 Bad Debt, with respect to network charges owed to the licensee by one or more Defaulting Gas Shippers. This row contains forecasts only and should not include any actual costs, which should be input in the row below labelled <i>Actual Bad Debt cost incurred</i>.</p> <p>For the <i>Interest income accrued adjustment</i> value, the licensee should input the adjustment for any interest income relating to late or non-payment of network charges. The adjustment is the difference between interest accrued at the default rates set out in the Uniform Network Code net of WACC with respect to the COVID-19 Scheme. Where this is an income amount, this should be entered as a negative.</p> <p>The <i>Recovered Bad Debt</i> value should be input as a positive value and should include the aggregate value of any Bad Debt recovered (including RIIO-GT1 Bad Debt and COVID-19 Bad Debt), where the costs have previously been recovered via the BDA term.<sup>9</sup></p>
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<sup>9</sup> For the System Operator, all references to Bad Debt, COVID-19 Bad Debt and RIIO-GT1 Bad Debt should be read as SO Bad Debt, SO COVID-19 Bad Debt and RIIO-GT1 SO Bad Debt respectively.

	All values should be exclusive of VAT.
<p><b><u>Pass-through costs – other</u></b></p> <p>TO:</p> <ul style="list-style-type: none"> <li>• NTS Transportation Owner Licenced Activity</li> <li>• Prescribed Rates</li> <li>• Pension Scheme Established Deficit repair</li> <li>• Secretary of State in respect of Policing Costs</li> <li>• PARCA Termination Value</li> <li>• Gas conveyed to Independent Systems</li> <li>• Hy-Net</li> <li>• Net Zero Pre-construction Work and Small Net Zero Projects Re-opener</li> </ul> <p>SO:</p> <ul style="list-style-type: none"> <li>• CDSP Costs</li> <li>• Pension Scheme Established Deficit</li> </ul>	<p>Pass-through costs are specified costs that are predominantly outside of a licensee's control and may be passed through to consumers. These costs are defined in SpC 6.1 (Transportation owner pass-through items) and SpC 6.3 (System operator pass-through items).</p> <p>For the Variable Values in rows 77:84 and rows 43:45 for TO and SO respectively, actual data for the reporting period in question should be input directly into the yellow input cells of the "TO PT" and "SO PT" sheets. This data is then picked up in the TO and SO PCFM Input Summary sheets, which should be used to populate the PCFM.</p> <p>Where required, further detailed guidance for updating these variable values will be provided in the GT RIGs.</p> <p><b>Forecasting</b></p> <p>Forecasts for future regulatory periods should be input directly into the yellow input cells of the "TO PT" and "SO PT" sheets. which should be used to populate the PCFM.</p>
<p><b><u>Incentive revenue (Output Delivery Incentives)</u></b></p> <p>TO:</p> <ul style="list-style-type: none"> <li>• Customer satisfaction survey ODI</li> <li>• Environmental scorecard ODI</li> </ul>	<p>Incentive revenue or output delivery incentives (ODI) are used to reward or penalise licensees for their performance.</p> <p>For the values in rows 90:91 for TO, actual data for the reporting period in question should be input directly into the yellow input cells of the "TO ODI" sheet. This data is then picked up in the</p>

	<p>"TO PCFM Input Summary" sheet, which should be used to populate the PCFM.</p> <p>Further detailed guidance for updating the underlying inputs to the calculations in the ODI sheet will be provided in the GT2 RIGs.</p> <p><b>Forecasting</b></p> <p>Forecasts for future regulatory periods should be input directly into the yellow input cells of the "TO ODI" sheet.</p>
<p><b><u>Other Revenue allowances</u></b></p> <p>TO:</p> <ul style="list-style-type: none"> <li>• RIIO-2 Network Innovation Allowance</li> <li>• Carry-over Network Innovation Allowance</li> <li>• Strategic Innovation Fund</li> </ul> <p>SO:</p> <ul style="list-style-type: none"> <li>• Constraint management incentive revenue</li> <li>• Revenue from accelerated release of incr. obl. entry capacity</li> <li>• Exit capacity buyback cost which users are liable to reimburse</li> <li>• Revenue for net residual balancing costs</li> <li>• Total costs for procurement of operating margin services</li> <li>• System costs</li> <li>• Residual balancing incentive</li> <li>• Quality of demand forecasting incentive</li> </ul>	<p>For the values in rows 95:96 and rows 49:59 for TO and SO respectively, actual data for the reporting period in question should be input directly into the yellow input cells of the "TO ORA" and "SOORA" sheets. This data is then picked up in the SO and TO PCFM Input Summary sheets, which should be used to populate the PCFM.</p> <p>With respect to <i>Total NIA Expenditure</i>, the licensee must input expenditure excluding any expenditure which is deemed to be 'Unrecoverable NIA Expenditure' as per the requirements of the RIIO-2 NIA Governance Document.</p> <p>Further detailed guidance for updating the underlying inputs to the calculations in the "TO ORA" and "SOORA" sheets will be provided in the GT2 RIGs.</p> <p><b>Forecasting</b></p> <p>Forecasts for future regulatory periods should be input directly into the yellow input cells of the above referenced TO and SO sheets</p>

<ul style="list-style-type: none"> <li>• Greenhouse gas emissions incentive</li> <li>• Maintenance incentive</li> </ul>	
<p>Legacy MOD</p>	<p>Legacy values will be directed by Ofgem following the formal close-out of the RIIO-GT1 price control.</p> <p>In the interim period between the beginning of GT2 and the direction of these values following the close-out of GT1, Ofgem will provide provisional LMOD values in accordance with the processes set out in chapter 8 of the PCFH.</p> <p>The estimated legacy GT1 PCFM will be re-run by Ofgem during the course of the dry runs process and as such, for the first submission in August 2021 this Variable Value should remain as was set in the PCFM issued by Ofgem on 1 June 2021.</p>
<p>RIIO-1 net RAV additions (after disposals)</p>	<p>Legacy values will be directed by Ofgem following the formal close-out of the RIIO-GT1 price control.</p> <p>In the interim period between the beginning of GT2 and the direction of these values following the close-out of GT1, Ofgem will provide provisional LRAV values in accordance with the processes set out in chapter 8 of the PCFH.</p> <p>The estimated legacy GT1 PCFM will be re-run by Ofgem during the course of the dry runs process as such, for the first submission in August 2021 this Variable Value should remain as was set in the PCFM issued by Ofgem on 1 June 2021.</p>

<p><b><u>Other Legacy adjustments</u></b></p> <p>TO:</p> <ul style="list-style-type: none"> <li>• Legacy pass-through</li> <li>• Legacy K correction</li> <li>• Legacy TRU</li> <li>• Close out of the RIIO-GT1 network outputs</li> <li>• RIIO-GT1 network innovation competition</li> <li>• Close out of the RIIO-GT1 stakeholder satisfaction output</li> </ul> <p>SO:</p> <ul style="list-style-type: none"> <li>• System Operator legacy K correction</li> <li>• System Operator legacy TRU term</li> <li>• Close out of the RIIO-GT1 entry and exit capacity constraint management incentive</li> <li>• Close out of the RIIO-GT1 constraint management cost adjustment</li> <li>• Close out of the RIIO-GT1 transportation support services adjustment</li> </ul>	<p>Legacy values will be directed by Ofgem following the formal close-out of the RIIO-GT1 price control.</p> <p>In the interim period between the beginning of GT2 and the direction of these values following the close-out of GT1, Ofgem will provide provisional legacy values for input in rows 105:111 and 64:70 for TO and SO respectively, of the PCFM in accordance with the processes set out in the "Legacy Adjustment to Revenue section" of chapter 8 of the PCFH.</p> <p>For the first submission of the PCFM in August 2021, licensees should use the RIIO-1 Revenue RRP to populate the legacy values that feed into the LARt term under the special conditions in chapter 7 of the licence.</p>
<p><b><u>Directly remunerated services</u></b></p> <p>TO:</p> <ul style="list-style-type: none"> <li>• Pre-vesting directly remunerated services</li> <li>• Post-vesting directly remunerated services</li> <li>• Other income from directly remunerated services</li> <li>• Identified directly remunerated services costs</li> </ul>	<p>For the values in rows 115:118 for NGGT-TO, actual and forecast data for the reporting period in question should be input directly into the yellow input cells in the "TO PCFM Input Summary" sheet, which should be used to populate the PCFM.</p>

iBoxx trailing average ( $iBTA_t$ ) Risk-free rate (RFR and SORFR)	<p>These finance inputs are calculated by the Authority using the WACC allowance model and feed into the licensee's allowed return on capital.</p> <p>The input values in rows 122:123 and rows 75:76 for TO and SO respectively, are calculated and populated by Ofgem during the final dry run of each AIP, which usually takes place in early November.</p> <p>These values are sourced from the updated WACC allowance model. The methodology for the derivation of <math>iBTA</math> and RFR is described in chapter 4 of the PCFH.</p>
Sterling Overnight Index Average ( $I_t$ )	<p>This finance input is calculated by the Authority using the WACC allowance model and is used in calculation of the correction term (<math>K_t</math>).</p> <p>The input value in row 124 and row 77 for TO and SO respectively, is calculated and populated by Ofgem during the final dry run of each AIP, which usually takes place in early November.</p> <p>This value is sourced from the updated WACC allowance model.</p>
Real Price Effects (RPEs) annual growth rate	<p>This value (%) is calculated by the Authority and is sourced directly from the updated RPE model in accordance with the methodology and process set out in chapter 5 of PCFH.</p> <p>A redacted version of this workbook will be shared with the licensee and published by Ofgem following each AIP, alongside the PCFM and WACC Allowance Model.</p>
Adjusted net debt	For this variable value, actual and forecast data for the reporting period in question should be

	<p>input directly into the company specific input sheets of the PCFM.</p> <p>The figures used to update this variable value should be those reported as "Net Debt as per the Regulatory (RIIO-1) definition" in the licensee's submitted RFPR.</p> <p>See the RFPR Guidance for further detail on what this value comprises.</p>
Tax deductible net interest cost	<p>For this variable value, actual and forecast data for the reporting period in question should be input directly into the company specific input sheets of the PCFM.</p> <p>The figures used to update this variable value should be those reported as "Net Interest as per the Regulatory (RIIO-1) definition" in the licensee's submitted RFPR.</p> <p>See the RFPR Guidance for further detail on what this value comprises.</p>
Tax liability allowance adjustments – driven by tax trigger events	<p>This value will not be applicable unless the licensee has followed the notification process set out in chapter 6 of the PCFH.</p> <p>Ofgem will provide confirmation of the final figure to be used for this variable value.</p>
Tax liability allowance adjustments	<p>This value will not be applicable unless the Authority has directed a value following a tax review under Special Condition 2.2.</p>
Capital allowance opening pools brought forward	<p>Legacy values will be directed by Ofgem following the formal close-out of the RIIO-GT1 price control.</p>

	<p>In the interim period between the beginning of GT2 and the direction of these values following the close-out of GT1, an estimate of the closing balances taken from the legacy GT1 PCFM as agreed with Ofgem during the 2021 Legacy AIP should be used.</p> <p>The estimated legacy GT1 PCFM will be re-run by Ofgem during the course of the dry runs process and, as such, for the first submission in August 2021 this Variable Value should remain as was set in the PCFM issued by Ofgem on 1 June 2021.</p>
Tax loss brought forward	As above for "Capital allowance opening pools brought forward".
Tax pool allocation rates	<p>For the values in rows 143:148 and rows 96:101 for TO and SO respectively, the rates used to allocate totex into the different tax pools can be updated using the calculations in the "TO Tax Pools Totex allocations" and "SO Tax Pools Totex allocations" sheets of the GT2 Revenue workbook.</p> <p>Allocation percentages of totex categories to tax pools should be input by the licensee in the yellow input rows based on their actual allocations. These rates will then be used to derive capital allowance allocation rates used by the PCFM.</p>
Recovered Revenue	This variable value as defined in SpC 2.1, Part B of GT License should be provided by licensees and input directly into company specific input sheets of the GT2 PCFM.
Penal rate proportion	This value will be calculated and input by Ofgem.
CPIH Outturn	This value is shown in the "Monthly inflation" sheet of the PCFM and will be updated by the



	<p>Authority in line with the methodology for the Price Index calculation set out in chapter 2 of the PCFH.</p> <p>Ofgem will update the CPIH outturn index during the final dry run of each AIP using data that is available as at 31 October.</p>
RPI Outturn	<p>This value is shown in the “Monthly inflation” sheet of the PCFM and will be updated by the Authority in line with the methodology for the Price Index calculation set out in chapter 2 of the PCFH.</p> <p>Ofgem will update the RPI outturn index during the final dry run of each AIP using data that is available as at 31 October.</p>
RPI inflation forecast (Calendar year)	<p>This value is shown in the “Annual inflation” sheet of the PCFM and will be updated by the Authority in line with the methodology for the Price Index calculation set out in chapter 2 of the PCFH.</p> <p>Ofgem will update the RPI inflation forecast during the final dry run of each AIP using Office for Budget Responsibility (OBR) data that is available as at 31 October.</p>
Long term CPIH inflation forecast	<p>This value is shown in the “Annual inflation” sheet of the PCFM and will be updated by the Authority in line with the methodology set out in chapter 4 of PCFH.</p> <p>Ofgem will update this inflation forecast during the final dry run of each AIP using OBR data that is available as at 31 October.</p>

CPI inflation forecast (Calendar year)	<p>This value is shown in the “Annual inflation” sheet of the PCFM and will be updated by the Authority in line with the methodology for the Price Index calculation set out in chapter 2 of the PCFH.</p> <p>Ofgem will update the RPI inflation forecast during the final dry run of each AIP using OBR data that is available as at 31 October.</p>
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## 5. PCFM Dry Run Commentary

### Background

5.1. This licensee's PCFM submission should be accompanied by supporting commentary as well as any applicable subsidiary models and underlying workings.

5.2. The main purpose of the PCFM dry run commentary is to provide a useful summary of the updates that have been made to the PCFM variable values and the impact that these have had on the licensee's Allowed Revenue for the Regulatory Year  $t$ , in narrative form.

### Structure of the commentary

5.3. The outline structure of the commentary is as follows:

- Executive summary
- Updates to the PCFM Variable Values
- Impact on Allowed Revenue
- Statement on forecast data
- [Corporate governance narrative]
- Data assurance statement
- Other relevant information

5.4. The sections outlined above should contain sufficient detail such that the Authority is able to re-perform the updates made and arrive at the same value for ADJR and ART.

5.5. The licensee should provide detail on the following areas at a minimum:

- a summary of the updates the licensee has made to the PCFM Variable Values in the input sheet(s) since the last published version of the PCFM that was made available by Ofgem;
- the source of the data used to update the PCFM Variable Values (ie, Ofgem directions, Cost and Volumes RRP, Legacy PCFM or forecast data);
- a description of the impact of the changes on ADJR and Allowed Revenue and the key driver(s) of this impact;
- for any forecast data, the licensee should include a statement confirming that it has used its best estimate to ensure forecasts are reasonable in light of the information available at the time and that any significant changes to forecast values have suitable supporting statements;

- [a statement on corporate governance including detail on the licensee's executive remuneration and its dividend policy;]
- A data assurance statement briefly setting out the assurance processes that the information in the commentary, the PCFM inputs sheet and any underlying input files (eg, Cost and Volume RRP) are subject to; and,
- any other information the licensee considers is appropriate to explain the PCFM submission.

## Submission

5.6. A dry run commentary is required from all licensees. Where a licensee is part of a company that has more than one licence within a sector they may submit a single commentary to cover all licensees.

5.7. The dry run commentary should reconcile with and refer to the PCFM dry run submitted. Any narrative or tables in the commentary should be clearly disaggregated by licensee (by TO and GSO).

5.8. Where appropriate, the licensee may cross-reference to other information that supports their submission. Any cross-referencing should clearly direct the Authority to the source data used eg, through hyperlinks.

DRAFT