Cadent

Your Gas Network

Regulatory Financial Performance Reporting (RFPR) Commentary

RIIO-1

July 2019

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Executive Summary

Overview

Our Regulatory Financial Performance Reporting (RFPR) comprises of reports for each of our 4 networks in line with the Regulatory Instructions and Guidance (RIGs) and clarifications received during the course of preparation.

Our RFPR submission and our Strategic Performance Overview (SPO) both address the regulatory performance of Cadent. Consequently the 2 documents should be read in conjunction. Specific details of our key operational performance measures can be found within section 4, page 19 of the SPO. We have discussed the key financial performance measures below and have also discussed these within section 4, page 48 of the SPO.

The enduring value concept, the principles of which were discussed at length during the implementation of the RFPR in 2018, impacts the phasing of the historic and future annual RORE values across our networks; however, on an 8 year average basis the operational RORE values are largely unaffected. Our methodology for each of the enduring value adjustments is described in more detail in section 3.1; as per last year the adjustments have the overall effect of deferring allowances from earlier years into later periods.

For our reported debt costs, we include analysis below of adjustments which need to be made to properly reflect the true economic costs of our debt. These adjustments have a natural correcting effect on the debt outperformance. Full details of the rationale and basis of these adjustments are set out in section 6 of this document. Throughout this document our commentary refers to our performance inclusive of these debt adjustments.

Overall Performance

RORE (including financing and tax) forecast for RIIO-1 is 10.52% (11.69% before adjustments to reflect the true economic cost of our debt) with the breakdown across our 4 networks set out in section 1 below.

Our overall RORE performance reflects our focus on ensuring that both our operational and non operational cost base is optimised to deliver on our requirements as cost effectively as possible.

Compared to the prior year the RORE has reduced by 0.58%. The reduction in operational RORE is largely a reflection of the unit cost pressure to deliver the remaining elements of our investment programme.

The adjustment to show our true economic costs of debt has not changed relative to our prior year submission and is detailed below.

Debt Performance

Cadent benefits from a comparatively low relative cash cost of ongoing debt as our debt was raised and refinanced largely in a single financial year when interest rates were low. As a result, we outperform the 10-year average Iboxx index used for allowance setting. To achieve this comparative low cost of debt significant one-off cash costs were incurred in FY2017. We have included in our

analysis below the impact of incurring these one off cost as we believe this provides a fairer reflection of the true economic cost of our debt. However, currently the RIGs do not support reporting these costs in the RFPR.

Separately, Ofgem has completed cross checks on this adjustment which identified a comparable total quantum. Further details are provided in the detailed commentary below.

Detailed Commentary

Data Assurance
As we became an independent business in 2016/17 and are now separated from National Grid, we have limited access to some elements of the historic information. Consequently, we have used the Gas Distribution totals from available information including the Regulatory Accounts, PCFM submissions and where available, extracts from the RRP submissions in replacement for the statutory account numbers requested. Starting with a Gas Distribution position instead of the statutory position is a deviation from the RIGs which has been separately agreed with Ofgem. For periods after 2016/17 we have provided actual performance information from our statutory accounts.

For the historic years throughout the tables, we have used either the Regulatory Accounts or the RRP data already submitted to Ofgem where possible. Where this has not been possible we have obtained supplementary information from National Grid. Ofgem has confirmed their agreement to us not including the detailed historic information on the financing tabs.

Forecast operational information provided in the templates and forecast financing and tax performance are based on our internal plans; using assumptions consistent with the RIGs.

The information submitted in the RFPR has been subject to a high level of internal reviews including data accuracy and completeness checks as well as independent reviews wherever the table is deemed to be a high risk table.

Overview of Regulatory performance

1. RORE

The RORE tab within the RFPR pack expresses the Return on Regulated Equity based on both notional gearing and actual gearing, as well as showing the monetary value of performance for each year of RIIO-1.

The overall operational RORE has reduced from 9.48% in FY17/18 to 9.16% in FY18/19. The reduction is driven by unit cost pressures to deliver our investment programmes along with investment to support transformation of our business (detailed in section 3 on page 15 of the SPO). Additionally, in 2019 Cadent agreed to pay an increased level of compensation and redress fund contributions for poor customer service in relation to unplanned interruptions to customers in multi occupancy high rise buildings within London; this has further reduced the RORE. Additional details are provided in section 11 below. The decrease in RORE has been slightly offset by a marginally higher incentive income expectation.

Our current eight year RORE forecast is summarised in chart and table below. Our method of RORE calculation is aligned to the approach used within the RFPR templates. We have endeavoured to ensure that the forecast reflects our best available view of eight year RORE performance, reflecting the revised totex positions submitted in the 2019 RRP, inclusive of the expected consequential effect to RAV balances.

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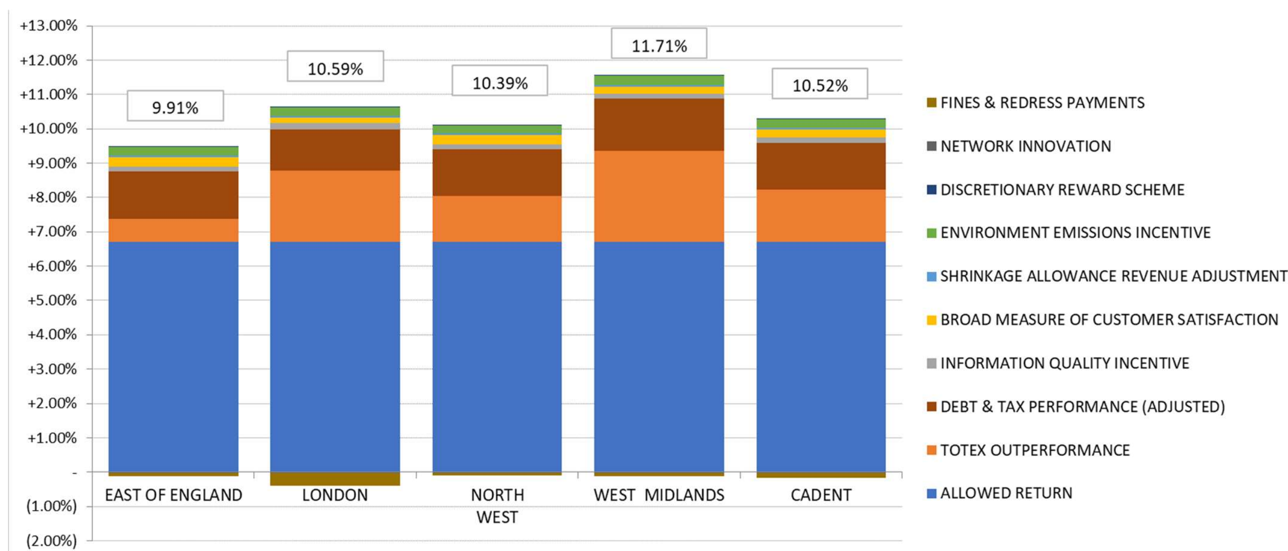
RORE PERFORMANCE	RIIO GD-1				
CATEGORY	EAST OF ENGLAND	LONDON	NORTH WEST	WEST MIDLANDS	CADENT
ALLOWED RETURN	+6.70%	+6.70%	+6.70%	+6.70%	+6.70%
TOTEX OUTPERFORMANCE	+0.68%	+2.09%	+1.35%	+2.67%	+1.53%
INFORMATION QUALITY INCENTIVE	+0.13%	+0.17%	+0.14%	+0.14%	+0.14%
BROAD MEASURE OF CUSTOMER SATISFACTION	+0.27%	+0.16%	+0.27%	+0.20%	+0.23%
SHRINKAGE ALLOWANCE REVENUE ADJUSTMENT	+0.05%	+0.05%	+0.04%	+0.05%	+0.05%
ENVIRONMENT EMISSIONS INCENTIVE	+0.25%	+0.26%	+0.23%	+0.29%	+0.25%
DISCRETIONARY REWARD SCHEME	+0.00%	+0.00%	+0.00%	+0.00%	+0.00%
NTS EXIT CAPACITY	+0.55%	+0.36%	+0.41%	+0.27%	+0.42%
NETWORK INNOVATION	(0.04%)	(0.03%)	(0.04%)	(0.03%)	(0.03%)
FINES & REDRESS PAYMENTS	(0.07%)	(0.37%)	(0.07%)	(0.08%)	(0.14%)
OPERATIONAL RORE PERFORMANCE	**+8.52%**	**+9.39%**	**+9.04%**	**+10.20%**	**+9.16%**
DEBT PERFORMANCE	+2.58%	+2.59%	+2.59%	+2.64%	+2.60%
TAX PERFORMANCE	(0.04%)	(0.19%)	(0.08%)	+0.04%	(0.06%)
TOTAL RORE PERFORMANCE	**+11.07%**	**+11.79%**	**+11.55%**	**+12.88%**	**+11.69%**
ADJUSTMENT TO REFLECT THE TRUE ECONOMIC COSTS OF OUR DEBT	(1.16%)	(1.20%)	(1.16%)	(1.17%)	(1.17%)
TOTAL RORE PERFORMANCE (ADJUSTED)	**+9.91%**	**+10.59%**	**+10.39%**	**+11.71%**	**+10.52%**

(All RORE numbers quoted above are based on notional gearing)



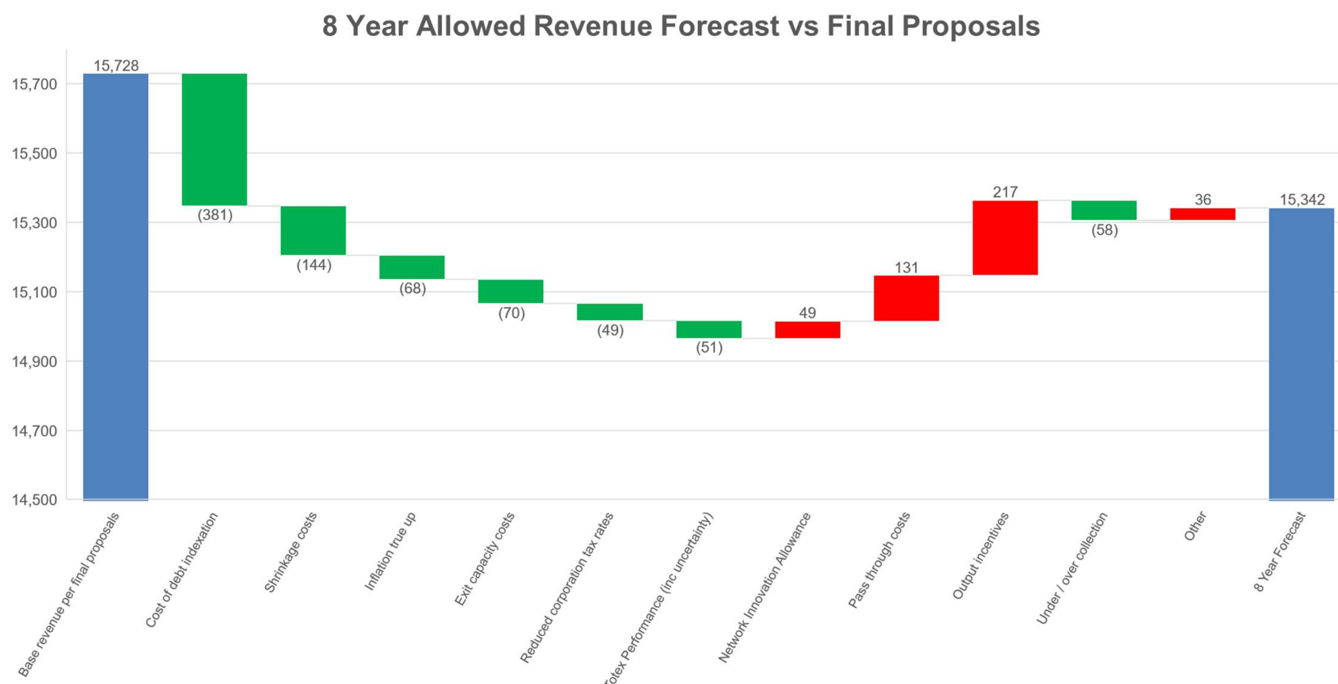
We discuss the performance on the individual RFPR tables below.

2. Revenue

Allowed Revenue Forecast

We anticipate continued reduction in Allowed Revenue forecasts in real terms across the remainder of RIIO-1, with closing revenue currently forecast to be 9.5% lower than opening positions. Please see page 48 in our SPO for our detailed revenue commentary.

Relative to the RIIO-1 Final Proposals, we expect total allowed revenue for the price control period to be around £387m lower in 2018/19 prices. The chart below summarises our current allowed revenue projections for RIIO-1 in 2018/19 prices.



3. Totex Performance

We are focussed on delivering value for our customers with our continued delivery of Opex cost efficiencies as outlined in our SPO (section 3 page 15-18). Our opex forecast for 2020/21, the last year of RIIO-1, has been reduced further and we now seek to deliver an ambitious 17% improvement in our first four years of operating as a standalone business. This is due to our commitment to deliver transformational and on-going business improvement efficiencies in real terms and to offset some of the emerging upward Opex cost pressures we face. This has been offset by an increase in our Repex forecasts mainly reflecting further market driven unit cost increases driven by the scarcity/competition in securing the qualified resources, which have also been seen in the current year. This is further offset by an increase in our Capex forecast as a result of transformation costs and an increase in customer driven connections.

The effect of both enduring value adjustments and our output delivery profile has resulted in a larger RORE in the residual years of the price control, relative to the earlier years. This primarily reflects the absolute value of the increased workload being completed in the remaining RIIO-1 period rather than an improvement in unit cost profile. The actual return that will be experienced in these years will be significantly lower than presented due to the upward pressures on unit costs. Overall, the effect of the Totex enduring value adjustments on the 8 year average RORE is negligible as the overall allowance is unchanged and we forecast to deliver all regulatory commitments.

3.1. Enduring Value

Based on the assessment of our workload delivery over the RIIO-1 price control, we deemed it appropriate to make an enduring value adjustment for elements of Repex and Capex.

Repex
We have made an adjustment to re-phase the Repex allowances to follow our workload delivery. As described in the SPO, forecast Repex spend to deliver the mains decommissioned length output has increased, mainly due to market driven unit cost increases and higher than anticipated workload in respect of non-rechargeable diversions (see section 3 page 15 of our SPO). Despite these higher cost forecasts for the future we will still strive to deliver efficiencies against our allowances in the remaining RIIO-1 period and hence still continue to deliver on-going benefits for our customers.

Capex
Allowances for Capex were originally set of the basis of the NOMs regime which has since been replaced by the monetised risk process which has been decided during RIIO-1. Consequently it is not possible to directly measure forecast outputs against original price control allowances and the calculation of a bottom up enduring value adjustment is not practical. However, we recognise that the phasing for some of our Capex workload has differed from our allowance profile, as a result of our asset management strategy to optimise the economic lives of our existing network assets before committing to investment decisions /programmes to replace them, particularly around LTS and governors. We also note that our forecasts have increased since last year largely driven by our transformation strategy as discussed in our SPO (see section 3 page 15). Consequently we have estimated an adjustment at an aggregate level using actual and forecast spend as a proxy, as it is not possible to calculate this at a detailed level without a large amount of uncertainty and estimations.

Gas Holders
During 2013/14 National Grid Gas (NGG – now Cadent Gas) implemented an initiative (known as “Project Nexus”) with National Grid Property (NGP) to transfer the redundant gas holders and associated land out of NGG. The required number of redundant gas holders (i.e. 101) were transferred to NGP and upon the transfer NGG incurred a cost equal to the allowed unit cost agreed in the Final Proposals. As a result, the regulated business is expected to fully deliver the required output at allowed cost. The table below details the number of sites that were transferred to NGP, together with the cost incurred by NGG.

	2013/14		2014/15		2015/16	
NETWORK	**COSTS TO NGG (£'M)**	**HOLDERS TRANSFERRED TO NGP (No.)**	**COSTS TO NGG (£'M)**	**HOLDERS TRANSFERRED TO NGP (No.)**	**COSTS TO NGG (£'M)**	**HOLDERS TRANSFERRED TO NGP (No.)**
EAST OF ENGLAND	15.2	27	1.1	2	-	-
LONDON	19.2	25	5.5	7	1.3	1
NORTH WEST	1.7	3	18.3	32	-	-
WEST MIDLANDS	2.2	4	0	0	-	-
CADENT	**38.3**	**59**	**24.9**	**41**	**1.3**	**1**

NGP are completing the programme more rapidly than the phasing included in final proposals because maintenance costs are incurred if disused gas holders are left in existence to ensure the that structures do not become unsafe and

they remain secure. Consequently, we have adjusted the allowances to be in line with the sale of the sites and the recognition of Totex costs as reported in RRP table 3.9.

Uncertainty Mechanisms
Our latest forecasts for smart metering are under the threshold for a re-opener, consequently we have not made an enduring value adjustment for future Smart Metering allowances in this year's RFPR.

Close out mechanism
In line with the prior year, we still expect to deliver the Asset Health Network Output Measures (NOMs) which form part of the overall Risk Monetisation targets for each of our networks and therefore have not adjusted the overall allowance, but phased only for the timing of work delivery

4. Output incentive performance

Output incentives are a fundamental part of the RIIO price control and incentivise network companies to drive continuous performance improvements.

Output incentives are generally earned in a year and collected after a two year time lag with relevant adjustments made for inflation and time value of money.

The RFPR requires an expression of earned incentive performance that is not defined by the Licence or the RIIO-1 Financial Handbook. However, taking the revenue outturn equivalents as defined by licence, a 2009/10 equivalent value stripped of time lagging, inflationary, interest bearing and time value of money adjustments can be calculated, but it is important to note that this is a stylised expression that does not fall naturally out of financial models or reporting templates provided by Ofgem. Instead we have utilised our internal financial models that are used for the purposes of internal business planning, Transportation unit price setting, and the quarterly revenue forecasts provided to Gas Shippers.

Output incentives feed into the RORE (on a post-tax basis using the tax rate based on year of collection) in the year they are earned rather than the year they are collected which is when they would form part of statutory revenues.

We have recently received a DRS award, and these values have now been included in the tables.

Please refer to the SPO (page 52) for analysis of our output performance.

5. Innovation

Expenditure under the Network Innovation Allowance is capped to 0.7% of each network's Base Revenue each year. Provided that expenditure is within this cap, and that a 25% / 75% ratio of internal / external expenditure is maintained then 90% of the eligible costs are funded in year. In addition to the 10% unfunded element, any excess of expenditure outside the cap, or the internal / external ratios is disallowed. As such the impact of the NIA on RORE for our networks is very limited, as it relates to a relatively low level of unfunded expenditure. For more information on our Innovation activity, please see page 44 in our SPO.

6. Financing and Net Debt Position

As noted above, we benefit from a comparatively low cash cost of debt. This is as a result of significant capital structure changes to create a separate Gas Distribution business (the “segmentation”). The low cost of debt results in an outperformance of the allowed funding for debt and an increase in reported RORE; however this excludes the one-off costs associated with the segmentation. If the repayment of old legacy National Grid debt had not happened then the current cost of debt for the Gas Distribution business would be higher over the medium term.

Cost of debt allowances are set assuming debt is raised evenly over a 10 year period to fund investment in the network over time. However, the majority of our current debt portfolio was priced largely in a single year (FY17) due to the segmentation when market rates were low.

The intent of the segmentation was to transfer National Grid’s debt across to Cadent. However, due to the complexity and cost of this process, the novation of all debt requirements was not possible. As such, expensive National Grid legacy debt was repaid and new cheaper debt was issued at the low prevailing market rates. However, significant costs were incurred in order to repay the old legacy debt and secure a much lower ongoing cost of debt effectively accelerating future cash payments.

Bondholders and banks were paid the difference between the cost of the old expensive debt and the market rate of new debt as compensation. These one off costs incurred at various points during the segmentation are recorded in the statutory accounts of various entities, including the 2017 statutory accounts of National Grid Electricity Transmission plc (‘NGET’ or ‘the electricity business’) and National Grid Gas plc (‘NGG’ or ‘the gas business’), as well as in the 2017 regulatory accounts for Cadent.

Current Ofgem RIGs do not support the adjustment to be included in reported results and as such we are providing RFPR tables with and without the adjustment. We firmly believe adjusting the cost of reported debt to reflect the true economic cost provides stakeholders with a more meaningful view on our performance.

The table below shows RORE including and excluding this adjustment.

8 YEAR AVERAGE RORE – INCLUDING FINANCING AND TAX					
	EAST OF ENGLAND	LONDON	NORTH WEST	WEST MIDLANDS	CADENT
RORE EXCLUDING ADJUSTMENT	+11.07%	+11.79%	+11.55%	+12.89%	+11.69%
RORE INCLUDING ADJUSTMENT	+9.91%	+10.59%	+10.37%	+11.71%	+10.52%

(All RORE numbers quoted above are based on notional gearing)

Ofgem has completed cross checks and note in footnote 11 of their publication “RIIO-2 Sector Methodology Decision – Finance” that the cross checks support the total quantum of the adjustment.

7. Taxation

Lower actual tax deductions overall compared to notional allowances and accordingly higher tax liabilities means that we have underperformance against the tax allowance. The main reason for the tax underperformance on the tax table across the 8 years is the effect of the notional interest deducted in the calculation of the tax allowance being greater than the actual interest deducted in the CT600 and so giving rise to a higher tax allowance.

The impact of enduring value adjustments results in tax underperformance in earlier years which reverses in the last three years. There has also been an offsetting outperformance caused by the “deadband” adjustments, following a reduction in the tax rates.

8. RAV

The RAV has been impacted by the enduring value adjustments with a reduction of additions in the earlier years and an increase of additions in later years. See Section 3 for details on the enduring value adjustments made.

Due to the transition of Repex to 100% slow money over the course of RIIO-1 this has resulted in a higher amount of Repex spend included in the RFPR RAV.

9. Dividends

Dividends are broadly stable year on year. In 2016/17 the dividend paid of £95m for the four networks was lower due to the separation of the business from National Grid.

10. Pensions

Prior to the separation of the business from National Grid and the subsequent sectionalisation of the Defined Benefit pension scheme, allowances were applied to National Grid Gas Transmission and allocated indirectly to each network via an NTS recharge. From 2017, following Sectionalisation of the National Grid UK Pension Scheme allowances, all liabilities are now applied to each network directly and there is no NTS recharge. This has led to an increase in the deficit contribution shown for 2017/18 onwards in table R12.

We have received confirmation that in compiling and reviewing Cadent’s 2016/17 and 2017/18 RRP pension tables National Grid ensured that the total regulated deficit contributions (and PPF and Admin contributions) for the year for the scheme were split between Gas Transmission and Distribution in line with Ofgem’s formal approach to allocating allowances between Transmission and Distribution.

11. Other Activities

Since 2017/18 we have experienced significant challenges in respect to multi occupancy high rise buildings, in particular in our London network. We have taken action to address these issues and have recognised the impact of our performance through additional compensation payments and a payment of £8.9m to the Energy Savings Trust to recognise the impact of these issues on

our customers. This has been included across our four networks in the Other activities table.

The remainder of the table reflects the GSOP payments made across our four networks and is in line with the RRP table reported to Ofgem.

Appendices

1. Enduring Value Adjustments

Capex – The Capex allowances per RRP table 2.2 have been re-phased using the costs from RRP table 2.2 (actual and forecast). Original allowances for each year have then been deducted to give an enduring value adjustment which is entered onto R4.

Repex – The Repex allowances per table RRP 2.2 have been re-phased based on the workload submitted to Ofgem on RRP table 2.3. Using the final proposals to get a % split, the original allowances have been split between tier 1 allowances and other repex allowances. These two allowances have then phased based on the workload from RRP table 2.3. Original allowances for each year have then been deducted to give an enduring value adjustment which is entered onto R4.

2. Allocations and estimates

Existing revenue and cost allocation methodologies have been used to populate the RFPR.

- **General** - As a result of the separation of the DN business from National Grid Gas plc, the license was amended to discharge the DN business from its Metering and Meter reading obligation. As such, amounts relating to Metering and Meter reading are excluded from the DN regulatory accounts for 2016/17 and beyond. Therefore no adjustments are required to remove anything in relation to metering in tables requiring reconciliation to statutory accounts post 2016/17.

- **Revenue** - The second section of the Revenue table involves adding back all items of revenue that are included within the statutory accounts but excluded from the collected regulatory network revenues. These items include:

  - De-minimis revenue
  - Excluded services
  - Consented activities
  - Other transportation revenue
  - Customer contributions
  - Xoserve revenue – included in stats for the first three years given it was owned 5/9ths by NGG
  - Inter-group trading elimination – the reported figure in the revenue RRP excludes this adjustment which relates to trading between Gas Distribution and Gas Transmission.
  - Metering – This business was included within the Gas Distribution total within the first three years
  - Other three networks – revenue relating to other three networks needs to be added to get back to the total amount for Gas Distribution

  For any revenue that is not network specific the revenue has been allocated in line with the methodologies used within the Regulatory

Accounts and the Revenue RRP which are either subject to an audit or agreed upon procedures.

- **Totex** - For any costs that are not network specific the costs have been allocated in line with the revenue and cost methodologies set out in our cost allocation methodology statements which are reported to Ofgem annually and are applied to all regulatory reporting. This is subject to agreed upon procedures set by Ofgem.

  For the reconciliation to totex on tab R3, each of the network tables start with the total Gas Distribution regulatory accounts (National Grid Gas Distribution element of the regulatory accounts for the opening 4 years) or statutory accounts. An adjustment is then required to remove the other three networks based on their RFPR table R3 submission.

  The nature of the reconciling items for total expenditure are largely consistent with the combined OPEX, CAPEX and REPEX reconciling items from previous years - the principal adjustments relate to:

  - The removal of non-cash items (e.g. depreciation/amortisation, provision releases/additions) reported within the statutory accounts as these are not part of operating costs within the RRP
  - An adjustment to fully reflect the costs relating to Excluded Services which are included in the statutory accounts operational cost figure but do not form part of the Totex figure in the RRP 2.1 table.
  - The inclusion of cash spend against provisions (e.g. environmental provision utilisation) and any cash costs charged directly to exceptional items in the accounts
  - Adjusting for capital contributions received for new connections – these are included within turnover in the IFRS accounts (in line with IFRIC18)
  - The exclusion of GSOP payments as these do not form part of Totex. This has also impacted previous years reconciliations following the restatement of PCFM Totex figures to remove these costs.

GSOP Payments (£m nominal)						
	13/14	14/15	15/16	16/17	17/18	TOTAL
NORTH WEST	0.3	0.2	0.2	0.3	0.5	1.5
EAST OF ENGLAND	0.3	0.4	0.7	1.2	0.3	3.0
WEST MIDLANDS	0.2	0.3	0.3	0.3	0.4	1.4
LONDON	1.0	1.4	1.7	1.3	1.7	7.1
CADENT	**1.8**	**2.3**	**2.9**	**3.1**	**2.9**	**13.0**

  - Reconciling items specifically in respect of the atypical events which are included in the Statutory Accounts but have been excluded from the RRP. Please see below

- The removal of costs associated with the Grenfell tower investigation and public enquiry as these do not form part of the normal course of operating a GDN.
- The exclusion of costs associated with high rise building recovery programme incurred over 2018/19 and prior year have been excluded from the 2018/19 submission, as these have been treated as atypical.
- The removal of costs associated with the amounts committed to be paid to the Energy Savings Trust in support of its important ongoing work have been excluded from the 2018/19 submission, as these have been treated as atypical.
- The exclusion of costs in relation to the establishment of a community fund to support customers in vulnerable areas.
- The removal of costs driven by the separation of Cadent from National Grid (e.g. Information Systems, re-branding) which appear as exceptional costs within the Statutory Accounts but have been excluded from the RRP.
- The removal of costs such as the legal fines from the HSE and the charitable donation to National Energy Action (agreed with Ofgem) form part of the opex within the statutory accounts but are excluded from our RRP opex submission
- Pension costs in respect of the pension deficit recovery plan payment, which we have split between Established and Incremental. These are reported in RRP total expenditure incurred figure but not in the Statutory Accounts operational costs. Note the pension fund was sectionalised 1 January 2017 and therefore only applicable to 2018.
- 'Non controllable costs' as reported in table 3.1 of the RRP which include costs such as Network Rates, National Transmission System (NTS) exit costs, Shrinkage – these form part of statutory costs but are excluded from totex.

- **Output incentives** - We have selected t+2 for the year of taxation for all output incentives. Strictly the licence uses the t0 tax rate for the exit capacity incentive, however it is collected and taxed in t+2 and thus t+2 has been selected to give the correct post tax incentive value for the RORE calculation.

- **Innovation** - Given the projects are not network specific they are allocated to networks based on supply points consistent with previous RRP submissions.
  The NIA and NIC actual information in this table has been extracted from the RRP tables already submitted to Ofgem. For the NIC section of the table, the contribution for NIC 6 is only spread over the two years to the end of RIIO1 with the % split across the networks projected forward for the forecast elements of the table.

- **Financing** – For data pre 2017/18 the financing costs and net debt have been allocated to networks based on the same basis as for previous RRP submissions. For data in 2018/19 financing costs and net debt have been allocated to networks based on July 2019 RRP submission. For data in 2019/20 and into the forecast period, financing costs and net debt have been allocated to networks based on RAV consistent with our current RRP methodology.

  Forecast values for existing debt instruments for the period from 2019/20 to 2020/21 are based on financial projections utilising the inflation rate guidance provided.

Debt instruments that are expected to be refinanced in the medium-term are excluded from existing debt at the point in time of the planned refinancing and replaced with new debt.

New debt is forecast to support the Totex investment levels included in our RRP forecast. New debt instruments are assumed to be nominal debt with fixed rates.

- **RAV** - Given that the Ofgem PCFM cannot be easily used to output values in the manner required by the RFPR templates, forecast positions are derived from our internal financial models developed to assess the RIIO-2 financial framework. Internal models are reconciled to the Ofgem PCFM on each iteration, to provide assurance over the output values they provide. The underlying totex positions that feed RAV additions are based on tables 2.1 and 2.2 for the July 2019 RRP submission.
  The RFPR tables require an assessment of the impact of enduring value adjustments on the RAV. To derive post enduring value adjustments to the RAV, the approach is aligned to the methodology used to calculate enduring value adjustments for Totex (table R4). Totex allowances are reprofiled within our internal financial models with consequential effect to RAV additions and depreciation.

- **Tax** – For periods pre-separation from National Grid it has been agreed with Ofgem that the table should begin with the tax liability pre group relief per the tax in relation to the Distribution Networks, as such these figures have been provided to us by National Grid. These liabilities were compared to the charge per the Regulatory accounts and there were no material differences.

  Adjustments have been made where the tax in the CT600 is prepared on a different basis from the PCFM:
  - Adjustments are made are to reflect where revenues and operating costs are recognised in a different period from it is recognised in the tax allowance.
  - Adjustments have been made where a-typical items of expenditure included in the CT600 have not been included in the Totex and therefore feeding into the tax allowances.
  - Adjustments have been made for other profits/ losses that are included in the CT600 but not in the tax allowance (transfer pricing and de-grouping charge) and for items included in the tax allowance but not in the CT600 (Regulatory losses).
  - In the section to remove non-regulated tax liabilities an adjustment has been made to reflect the regulatory treatment of capex and repex contributions as the contributions are classified as excluded services. In 15/16, we have adjusted for a tax deduction following a change in accounting standards.
  - Within the other adjustments section an adjustment is also been made for finance costs for which a deduction has been taken in the CT600 but do not come within the RIIO 1 definition of finance costs that can be included in the tax allowance. In 16/17 a large adjustment of £169m has been made largely as a result of losses on debt buy-back costs in this period.

  The following assumptions have been made in the allocations of tax to the individual networks:

- For periods prior to 16/17, the tax charge per the CT600 by network has been taken from the RRP table 1.7 previously submitted to Ofgem.
- For 16/17 and 17/18 the CT600 tax liability by network has been based on the current year current tax charge in the Regulatory Accounts. The tax charge pre-exceptional was allocated to the networks on the basis of pre-exceptional profit before tax per network. The exceptional tax charge was allocated based on the exceptional charges per network.
- For 18/19 we have used the RRP data as a proxy to get the profit before tax by network, to use as a driver to split the tax by network
- For the forecast periods the tax liabilities have been allocated to the Networks based on estimated profit before tax by network.

- **Dividends** - The regulatory accounts apportion dividends between the 4 networks based on profit before tax. 2016/17 is an exception where PBT (calculated on a look through basis) is adjusted for the exceptional interest and re-measurements.
  We have completed the table with the dividends from the regulatory accounts up to 2017/18. From 2018/19, we have used a proxy driver to estimate the profit before tax by network using the data from the RRP, where possible, to split the dividends by network.

  For all years we have then stripped out any non-regulatory elements (including metering, other activities and de-minimis columns in the regulatory accounts). For 2016/17 there is no adjustment as there was a loss in the non-regulatory activities.

  A final adjustment is made to remove the dividends relating to the other three networks for each individual network RFPR submission.

- **Pensions** – The network splits within this table have been based on the PDAM methodology.
  Within the table the deficit payments have been based on amounts paid to the scheme. These payments have then been split into the established and incremental deficit elements of the scheme.

  The pre cut-off assets and liabilities have been based on the PDAM submission, with these lines being completed based on the overall pension scheme (section a, b and c).

  The post-cut off assets and liabilities have also been based on the PDAM submission, but have been populated for our scheme only (section C).

  The licensee elements of the total incremental deficit on line 35 has been determined using an allocation driver based on wages and salaries reported in the RRP in line with the cost allocation methodology.

  The licensee established deficit based on the gas distribution networks element of the total deficit, which has been allocated in line with the PDAM methodology.

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3. Revenue Analysis

Transportation Revenue - Allowed Revenue

Final 2018/19 Allowed Revenue for Cadent's networks was £1,871.4m. A high level summary is shown in the table below:

Allowed Revenue Summary (2018/19 Prices)	East of England	London	North West	West Midlands	Cadent
Opening base revenue	654.3	463.9	475.2	357.3	1,950.5
Annual Iteration Adjustment	(17.2)	(31.4)	(22.3)	(15.5)	(86.5)
RPI True Up	(2.5)	(1.8)	(1.9)	(1.4)	(7.7)
2018/19 Base Revenue	**634.5**	**430.6**	**450.9**	**340.4**	**1,856.4**
Pass through costs	(4.9)	(2.2)	(0.4)	0.2	(7.4)
Exit Capacity incentive	9.6	4.6	4.8	2.3	21.2
Shrinkage incentive	0.4	0.3	0.3	0.2	1.1
Environmental Emissions incentive	2.1	1.5	1.6	1.4	6.7
Broad Measure of Customer Satisfaction	4.1	1.1	2.2	1.0	8.4
Discretionary Reward Scheme	-	-	-	-	-
Network Innovation Allowance	1.6	0.9	1.1	0.8	4.4
O(over) / Under Recovery brought forwards	(4.7)	(4.3)	(7.8)	(2.6)	(19.4)
2018/19 Allowed Revenue	**642.7**	**432.4**	**452.6**	**343.6**	**1,871.4**

The annual iteration adjustment represents updates to opening base revenue, primarily composed of the impact of Cost of Debt indexation, Tax Trigger adjustments, actual Totex performance and adjustments to cost allowances in respect of uncertainty mechanisms. This adjustment has been discussed further in the SPO on page 49.

The RPI True Up is the two-year lagged revenue adjustment arising from the variance between forecast inflation (RPIFt) and actual inflation (RPIAt) for 2016/17. The provisional inflation assumption underpinned by HM Treasury forecasts was 2.33%. However actual average inflation for the formula year landed at 2.14%, resulting in the downward adjustment to revenue observed in 2018/19.

The Pass Through cost adjustment of (£7.4m) is comprised of the following elements:

- Increases to actual business rates costs in 2016/17 versus allowances: +£4.7m
- Increases to NTS pension deficit costs in 2016/17 versus allowances: +£9.7m
- Reductions to Ofgem Licence fees in 2016/17 versus allowances: (£1.3m)
- Net Transporter theft of gas recoveries in 2018/19: (£0.8m)
- Co-operative Energy Ltd's claim under Supplier of Last Resort: +£3.1m
- Decreases to actual exit capacity costs in 2016/17 versus allowances: (£10.3m)
  We estimate that this is comprised of (£23.7m) from reduced volume bookings, with +£13.4m relating to increases in NTS exit capacity unit prices
- Decreases to actual shrinkage costs in 2016/17 versus rebased allowances: (£12.5m)

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We estimate that this is comprised of around (£1.7m) relating to reduced shrinkage volumes and (£10.8m) relating to favourable movements in gas prices.

For the output incentive revenue adjustments (Exit Capacity, Shrinkage, Environmental Emissions and Broad Measure of Customer Satisfaction), these represent the two-year lagged incentive performance achieved in 2016/17. A section dedicated to cumulative actual and future forecast incentive performance is included later in this report.

Unlike the vast majority of revenue adjustments, the Network Innovation Allowance adjustment is not two-year lagged, and represents expenditure levels incurred in the year. In 2018/19 we spent £4.9m on innovation projects, which was 37% of the spend cap. Networks are allowed to recover 90% of eligible spend (subject to maintenance of a 75/25 external/internal cost ratio), resulting in the £4.4m adjustment shown in the chart and table above. 2018/19 Allowed Revenue also included the lagged repayment of the 1.0% over recovery of transportation revenue in 2016/17, inclusive of interest adjustments.

Other Turnover Items and Adjustments
The second section of the table involves adding back all items of revenue that are included within the statutory accounts but excluded from the collected regulatory network revenues. We have listed these adjustments in the appendix.