

Consultation on Harmonised Transmission Tariffs for Gas

28 February 2025





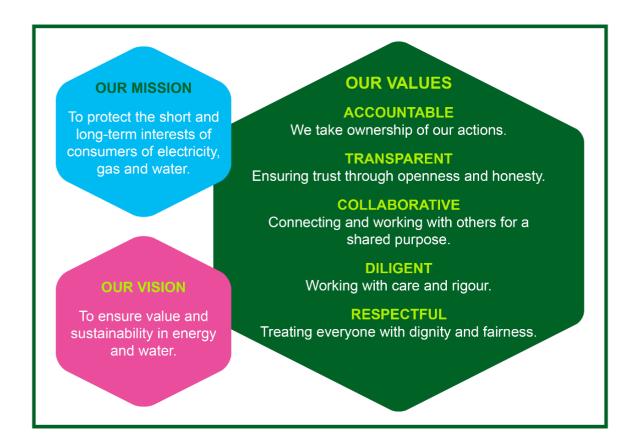
About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive and two Executive Directors lead teams in each of the main functional areas in the organisation: CEO Office; Price Controls; Networks and Energy Futures; Markets; Consumer Protection and Enforcement. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.





Abstract

This paper sets out our proposals for implementing any changes required for the Northern Ireland gas transmission charging regime, in order for it to continue complying with the TAR NC.

We consider that the current tariff regime continues to comply with the TAR NC, and we are not proposing any changes to Reference Price Methodology, the discounts to capacity charges, the allowed revenue of TSOs, the capacity/commodity split, the view on transmission and non-transmission tariffs, the multiplier and seasonal factors, and the dissemination of related documents at this time.

Audience

This document is likely to be of interest to regulated companies in the energy industry, government and other statutory bodies and consumer groups with an interest in the energy industry.

Consumer impact

This consultation is necessary to ensure compliance with European Gas Regulations and in particular the Tariff Network Code. As no changes are proposed, there will be no impact on consumers.

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Acronyms and Glossary

BGTL	Belfast Gas Transmission Limited, a TSO	
CRU	Commission for Regulation of Utilities, which regulates gas in the Republic of Ireland	
EU	European Union	
EUNCs	European Network Codes	
FOIA	Freedom of Information Act	
GDN	Gas Distribution Network (includes Phoenix Natural Gas Ltd, firmus Energy Ltd and SGN Natural Gas Ltd)	
GDPR	General Data Protection Regulations	
GMO NI	Gas Market Operator Northern Ireland	
GNI (UK)	Gas Networks Ireland (UK), a TSO	
NC	Network Code	
NI	Northern Ireland	
NRA	National Regulatory Authority – this is an EU definition and refers to the Utility Regulator in Northern Ireland	
Ofgem	The Office of Gas and Electricity Markets, which regulates gas in Great Britain	
PTL	Premier Transmission Limited, a TSO	
TAR NC	Network Code on Harmonised Transmission Tariff Structures for Gas	
TSO	Transmission System Operator GNI (UK), PTL, BGTL and WTL	
UR	Utility Regulator	
WTL	West Transmission Limited, a TSO	



Executive Summary

The European Union (EU) adopted the third legislative package in July 2009 to further the development of a Single European Gas Market. A key element of the third legislative package for gas is Regulation (EC) 715/2009¹ ("the Gas Regulation") which mandates the development of European network codes ("EUNCs") covering areas such as tariffing, capacity allocation and interoperability in each member state.

This consultation is regarding EU Regulation 2017/460², the Network Code on Harmonised Transmission Tariff Structures for Gas ("TAR NC"). In the intervening years since the publication of our original decision³, the UK formally left the EU leading to the removal or transposition of certain EU laws. The Gas Regulation was transposed into UK law with several amendments in 2019⁴ as part of the EU withdrawal Act 2018.

Article 27(5) requires that we consult on the implementation of the TAR NC every five years.

This paper examines the current aspects of the TAR NC that were implemented following the decision in 2018 and considers if we intend to make any changes maintain compliance with TAR NC.

The decisions made following the 2018 decision⁵ are still in place five years on and, we do not consider that any of these decisions need to be revisited or amended. We therefore propose to maintain the current Reference Price Methodology, the discounts to capacity charges, the allowed revenue of TSOs, the capacity/commodity split, the view on transmission and non-transmission tariffs, the multiplier and seasonal factors, and the dissemination of related documents.

This is in line with Ofgem's recent decision paper on the TAR NC⁶, where respondents favoured maintaining the current level of multipliers, seasonal factors, and discounts.

¹ Regulation (EC) 715/2009

² EU Regulation 2017/460

³ Decision on Harmonised Transmission Tariffs for Gas - December 2018

⁴ The Gas (Security of Supply and Network Codes) (Amendment)

⁵ Consultation on Harmonised Transmission Tariff Structure for Gas - June 2018

⁶ Ofgem Decision Letter TARNC Article28 Consultation 2024 Final



1. Introduction

Regulation 2017/460 – Network Code on Harmonised Transmission Tariff Structures for Gas ("TAR NC")

- 1.1 The European Union (EU) adopted the third legislative package in July 2009 to further the development of the Single European Gas Market. A key element of the third legislative package for gas is Regulation (EC) 715/2009 ("the Gas Regulation") which mandates the development of European Network Codes ("EUNCs") covering areas such as tariffing, capacity allocation and interoperability in each member state.
- 1.2 This consultation is regarding the Network Code on harmonised transmission tariff structures for gas, which is abbreviated to "TAR NC".
- 1.3 It was published on 16 March 2017⁷ with the objective of contributing to market integration, enhancing security of supply and promoting interconnection between gas networks.
- 1.4 It sets out rules on the application of a reference price methodology, the associated consultation and publication requirements as well as the calculation of reserve prices for standard capacity products.
- 1.5 We undertook a consultation on the requirements to comply with the TAR NC and published the subsequent Decision Paper in 2018. Under Article 27, we are required to consult on its implementation every five years.
- 1.6 In the intervening years since the publication of our original decision, the Gas Regulation has been transposed into UK law, as part of the EU withdrawal Act 2018.

Purpose of this paper

- 1.7 This paper reviews the current methodologies which comprise the gas transmission charging regime in NI as required by the TAR NC and considers if any changes should be proposed. This paper fulfils the requirement in the TAR NC to review our methodologies every five years.
- 1.8 Our first consultation on the TAR NC posed specific questions relating to the areas covered by the TAR NC for respondents to consider and reply to. However, many, if not all, of the decisions made in the 2018 decision paper, such as the 95:5 capacity/commodity split, the annual consultation on seasonal factors, and publication of documents have been implemented. As such, with this consultation, we are asking respondents if they are satisfied

⁷ COMMISSION REGULATION (EU) 2017/460



that these aspects be maintained as they continue to comply with the TAR NC.

- 1.9 In the 2018 consultation, we also outlined the European requirements including the network codes required by the Gas Regulations; the requirements summarised in the paper were:
 - Use of a consistent and transparent Reference Price Methodology which ensures cost-reflectivity and predictability for network users;
 - Defining of transmission and non-transmission services;
 - Rules about recovery of transmission services revenue;
 - The calculation of reserve prices for standard capacity products;
 - Review of multiplier and seasonal factors; and
 - Increased transparency of transmission tariff structures through increased requirements for publishing information.

Harmonised Tariff Structures for Gas ("TAR NC")

- 1.10 Alongside these requirements, Article 13(1) and 13(2) of the Gas Regulation states that tariffs and the methodologies used to calculate them, are required to:
 - Be transparent;
 - Reflect actual costs incurred;
 - Be applied in a non-discriminatory manner;
 - Facilitate efficient gas trade and competition;
 - Avoid cross-subsidies between shippers;
 - Maintain incentives for investment;
 - Maintain or create interoperability for transmission networks; and
 - Avoid restricting market activity or distorting trade across borders of different transmission systems.
- 1.11 The TAR NC sets out rules to ensure that these Articles are implemented.

Overview of proposals

1.12 We consider that the requirements within this regulation continue to be



delivered by the Northern Ireland postalised tariff regime and by the capacity commodity split following the previous consultation on the TAR NC. We outline our proposals for the relevant areas in the sections below.

Structure of this paper

- 1.13 The paper has the following sections:
 - Section 2: Reference Price Methodology
 - Section 3: Potential discounts to capacity charges
 - Section 4: Indicative reference prices
 - Section 5: Cost allocation assessment
 - Section 6: Allowed Revenue of TSOs
 - Section 7: Commodity-based Tariffs
 - Section 8: Transmission and non-transmission tariffs
 - Section 9: Multiplier and Seasonal Factors
 - Section 10: Publication Requirements
 - Section 11: Conclusion
 - Section 12: Next Steps
- 1.14 Each section consists of a brief overview of the consultation area, and our proposal for that aspect.

Responding to this consultation

1.15 We welcome any representations to this paper. The deadline for responses to the matters raised in this paper by no later than 28 March 2025.

Responses should be sent to:

Christopher McCool Networks Directorate Utility Regulator Queens House 14 Queens Street Belfast BT1 6ER

<u>Christopher.mccool@uregni.gov.uk</u> or <u>Gas_networks_responses@uregni.gov.uk</u>



- 1.16 Our preference would be for responses to be submitted by e-mail.
- 1.17 Your response may be made public by the Utility Regulator. If you do not want all or part of your response or name made public, please state this clearly in the response by marking your response as 'CONFIDENTIAL'.
- 1.18 If you want other information that you provide to be treated as confidential, please be aware that, under the Freedom of Information Act 2000 (FOIA), there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential.
- 1.19 Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)).
- 1.20 As stated in the GDPR Privacy Statement⁸ for consumers and stakeholders, any personal data contained within your response will be deleted once the matter being consulted on has been concluded though the substance of the response may be retained.
- 1.21 This document is available in other accessible formats, such as large print, Braille, audio cassette and a variety of relevant minority languages if required. To request this, please contact Christopher.mccool@uregni.gov.uk, paul.harland@uregni.gov.uk, and Gas_networks_responses@uregni.gov.uk.

⁸ UR GDPR Privacy Statement



2. Reference Price Methodology

Overview

- 2.1 The Reference Price Methodology ("RPM") means the methodology applied to the part of the transmission services revenue to be recovered from capacity-based transmission tariffs.
- 2.2 A general requirement is to apply the same RPM at all the entry and exit points within the system. For a multi-TSO entry-exit system, the same RPM should be applied by all TSOs.
- 2.3 The TAR NC specifies the requirements for an RPM in Article 79:
 - Enabling network users to reproduce the calculation of reference prices and their accurate forecast.
 - Taking into account the actual costs incurred for the provision of transmission services, having taken consideration of the complexity of the transmission network.
 - Ensuring non-discrimination and preventing undue cross-subsidisation including by taking into account the cost allocation assessments set out in Article 5.
 - Ensuring that significant volume risk related particularly to transports across an entry-exit system is not assigned to final customers within that entry-exit system.
 - Ensuring that the resulting reference prices do not distort cross-border trade.
- 2.4 In regard to these requirements, the postalised regime is transparent in that GMO NI publishes a simple spreadsheet alongside the annual tariff to allow users to replicate the tariff calculation.
- 2.5 Postalisation uses a postage stamp methodology so that shippers are charged the same entry and exit charges regardless of the distance travelled. This has encouraged consumers to connect right across the network and ensures non-discrimination.
- 2.6 And as there are no cross-border trades, so we do not need to make specific arrangements to prevent distortion.

⁹ EU Regulation 2017/460



Our Proposal

2.7 We consider that the postalised tariff regime continues to meet the requirements of a Reference Price Methodology in the TAR NC and we are not proposing any changes to the postalised regime.



3. Potential discounts to capacity charges

Overview

3.1 The TAR NC requires that discounts are offered in specific circumstances, particularly for interruptible capacity and for storage facilities.

Discount for Interruptible Capacity Charge

- The current postalised charges do not include an interruptible tariff, as only firm capacity is offered. The NI Gas Capacity Statement¹⁰ indicated that total annual gas demand in aggregate is expected to reduce over the 10-year period by 21.4%.
- 3.3 However, the expected peak day capacity, is set to increase by 10.1%, primarily due to growth in distribution demand which is expected to grow by 14.6%.
- 3.4 The NI Gas Capacity Statement has indicated that during the 10-year period, Moffat could become congested and the demand on the SNIP and BTP sections of the NI network (i.e. the demand on the network upstream of Carrickfergus) could exceed the capacity of the Moffat IP Entry.
- Therefore, we will continue to monitor this situation, for now, however we envisage that, at present, the tariff publications will state that no interruption has been forecast.

Discount for Capacity Charge for Storage

- 3.6 In order to prevent the double charging of gas to and from any storage facilities, Article 9 of the TAR NC requires that a discount of at least 50% should be applied to capacity charges for storage facilities and Article 28 requires that we consult on this matter annually.
- 3.7 As there are no storage facilities in NI, we do not propose to publish a storage discount for the Gas Year starting 2025.
- 3.8 At present, we are not aware of any imminent projects, however we will continue to consult annually on this matter as part of the seasonal multiplier consultation.

Our Proposal

3.9 Presently, postalised charges do not include an interruptible tariff, the NI Gas

¹⁰ Northern Ireland Gas Capacity Statement 2024-25



Network is projected to meet forecasted demand for the next ten years, and there are no active Gas storage facilities in NI. In view of this, we do not propose to change our approach to discounts to capacity charges.

4. Indicative reference prices

Overview

4.1 Article 26(1)(a)(iii) of the TAR NC requires that we provide indicative reference prices which are subject to consultation. As the reference price is equal to the reserve price for yearly firm capacity, it is available in the forecast postalised tariff¹¹, for 24/25 and with the forecast tariff for next year¹² which are published by the GMO NI. These indicative reference prices are calculated following the postalised tariff formula.

Forecast Postalised Capacity Charge for 24/25	ppkWh per day booked	
Annual Entry Capacity Charge	0.45647	
Annual Exit Capacity Charge	0.45647	

Table 1 – Indicative Reference Prices for 24/25

4.2 The indicative reference prices have been prepared according to the requirements of the TAR NC. We do not propose to amend these from the published charges.

¹¹ Postalised Tariff Explanatory Note Forecast 2024/25 – 2028/29

¹² GMO NI Current and future tariffs



5. Cost allocation assessment

Overview

- 5.1 Article 26(1)(a)(iv) of the TAR NC requires that we consult on the result and components of a cost allocation assessment on the transmission services revenue to be collected through capacity and commodity charges, as set out in Article 5.
- We are required to indicate the degree of cross subsidisation between intrasystem and cross-system network use based on the proposed RPM. Cross-system means transporting gas within an entry-exit system to customers connected to another entry-exit system, while intra-system is where gas is transported to customers within the same entry-exit system. We are required to ensure that the volume risk of transporting across a cross-system does not get assigned to the customers within (intra) that entry-exit system. As all gas flows into the NI transmission network are used within NI (an intrasystem), and none passes through NI to exit elsewhere, this is not an issue.
- As this has not changed, we refer the section in the previous consultation, to demonstrate the level of any cross-subsidisation by following a set of formulae and providing justification if the cost allocation ratio exceeds 10%.

Our Proposal

The state of the intra-system/cross-system split has not changed since the 2018 consultation. There is still no cross-system usage and as such no degree of cross subsidisation between intra-system and cross-system network use. We consider that this continues to comply with TAR NC, and we are not proposing to re-run the assessment.

6. Allowed Revenue of TSOs

Overview

Target revenue

- To meet the requirement in Article 26 (1)(a)(i), which references Article 30(1)(b), the Allowed Revenue for each TSO and the indicative transmission service revenue (which is also known as Postalised Allowed Cost and is calculated as the sum of the Allowed Revenues) are both published¹³ by the GMO NI as part of the postalised tariff process. The Explanatory Note¹⁴, which is prepared by the Utility Regulator and published by GMO NI, includes the previous year's revenue alongside the current year's revenue.
- We consider that this complies with the requirement, and we propose not to make any changes.

Entry-exit split

6.3 As outlined in the consultation paper on the introduction of entry charges in October 2014¹⁵, it is our view that an ex-ante entry-exit split is not in keeping with the current postalised system and therefore the entry-exit split should continue to be an output from the reconciliation process. This continues to be our view, and we consider that this complies with the TAR NC. We propose to make no change to the current arrangements.

Intra-system network use

6.4 There is currently no cross-system network use in NI.

Our Proposal

- 6.5 We consider that the current RPM continues to meet the requirements of the TAR NC in regard specifically to: the indicative allowed and/or target revenue of the TSOs and the transmission service revenue, the capacity commodity split, the entry-exit split, and the intra-system/ cross system split.
- 6.6 We are not proposing to change this approach.

¹³ GMO NI Standardised Section for TSO 2024

¹⁴ Postalised Tariff Explanatory Note Forecast 2024/25 – 2028/29

¹⁵ Consultation on the introduction of entry charges into the Northern Ireland postalised regime for gas - October 2014

7. Commodity-based Tariffs

Overview

- 7.1 The capacity commodity split was amended as a result of the original consultation on TAR NC from 75:25 to 95:5. The current split remains 95:5 and continues to comply with the TAR NC as it meets the requirement for the transmission services revenue to be recovered by a capacity-based transmission tariff with the exception of a flow-based charge to recover costs driven by the flow of gas.
- 7.2 Article 4(3) sets out the criteria to allow part of the transmission services revenue to be recovered through a commodity based transmission tariff. Where such a tariff is used, we are obliged, under Article 26(1)(c)(i) to set out:
 - The manner in which it is set
 - The share of the allowed or target revenue forecasted to be recovered from such a tariff
 - The indicative commodity based transmission tariff
- 7.3 Article 4(3) sets out the criteria which must be met for a flow-based charge. It must be:
 - Levied for the purpose of covering the costs mainly driven by the quantity of gas flows
 - Calculated on forecast or historical flows, and be the same at all entry points and exit points
 - Expressed in monetary terms or in kind
- 7.4 The flow-based charge within our transmission revenue is related to the cost of gas at the compressor in Scotland, which is a variable amount driven by the quantity of gas flows.
- 7.5 The indicative commodity based tariff is published, as part of the tariff publication, which takes place by 31 May in the year preceding the gas year in which it will apply¹⁶. The information published includes an explanation of how the tariff has been set and the amount of allowed revenue to be recovered from the commodity element.

¹⁶ GMO NI Standardised Section for TSO 2024



Our Proposal

7.6 We are satisfied that the capacity commodity split of 95:5 reflects the proportion of flow-based costs within the transmission revenue and we are not proposing to change it at this time.



8. Transmission and non-transmission tariffs

Overview

- 8.1 Article 4 of the TAR NC requires that services must be considered to be either transmission or non-transmission, and sets out the circumstances under which the services must be defined as transmission services, as follows:
 - The costs of such service are caused by the cost drivers of both technical or forecasted contracted capacity and distance; and
 - The costs of such service are related to the investment in and operation of the infrastructure which is part of the regulated asset base for the provision of transmission services.
- 8.2 Article 4(4) then offers the option of attributing a service, which does not meet the criteria above, to non-transmission. In that case, the cost of that non-transmission service would be recovered through a separate tariff and, if it benefits all network users, then the costs must be recovered from all network users.
- 8.3 The postalised regime recovers the required revenues of the TSOs through transmission charges only at present. That means that, effectively, the service provided by TSOs is classified as a transmission service. We consider that the service provided by the TSOs does meet the criteria outlined in paragraph 8.1, in that the costs are driven by the technical capacity and are part of the regulated asset base.

Our Proposal

8.4 We propose to continue to classify all services as transmission services.



9. Multiplier and Seasonal Factors

Overview

- 9.1 Article 13 of the TAR NC sets limits on the multiplier factors which may be applied:
 - Quarterly and monthly capacity products to have a multiplier of no more than 1.5
 - Daily and within-day capacity products to have a multiplier no higher than 3.
 - The arithmetic mean of the seasonal factors shall be within the same range of the respective multipliers outlined above.
- 9.2 In addition to considering the responses to this consultation, we are required to consider the positions of directly connected Member States countries and the other national regulatory authority.
- 9.3 Although the NI gas transmission network is physically connected to the networks of GB and RoI, at South West Scotland, and through the South North Pipeline, the networks are not fully inter-connected. However, the Single Electricity Market operates across the island of Ireland, which means that gas-fired power generators can effectively compete for electricity generation contracts across Ireland. For this reason, we consider it beneficial to maintain alignment with the Commission for Regulation of Utilities (CRU) with respect to the multiplier factors where possible.
- 9.4 Article 28(3) of the TAR NC requires that we take into account the views of respondents in the following aspects:
 - The balance between facilitating short-term gas trade and providing long term signals for efficient investment in the transmission system
 - The impact on the transmission services revenue and its recovery
 - The need to avoid cross-subsidisation between network users and to enhance cost-reflectivity of reserve prices
 - Situations of physical and contractual congestion
 - The impact on cross-border flows
 - The impact of the seasonal factors on facilitating the economic and efficient utilisation of the infrastructure



- The need to improve the cost-reflectivity of reserve prices
- 9.5 We consider that the current seasonal multiplier factors do deliver a balance between facilitating short term gas trade while providing long term signals for investment.

Our Proposal

9.6 Since the 2018 publication of our decision on the TAR NC, we have published consultations and subsequent decisions on the Seasonal Multiplier Factors annually. This continues to comply with the TAR NC, and we are not proposing to change our approach at this time.



10. Publication Requirements

Overview

- 10.1 To meet the objective of increasing the transparency of transmission tariff structures, Articles 29 and 30 of the TAR NC set out the information which must be published both before the annual yearly capacity auction and before the tariff period.
- 10.2 In summary, these include publishing information on the reference price methodology, the required transmission services revenue, the ratios including capacity commodity split, entry exit split and intra-system/ cross-system split. There are also specific requirements for publication of information with respect to the change from year to year and a forecast for the remaining years in the regulatory period. There is a requirement to publish a simplified tariff model which allows network users to calculate the transmission tariff for the current period and to estimate its evolution beyond that period.
- 10.3 Much of this information continues to be published by GMO NI through the postalised tariff regime, specifically:
 - The Forecast Tariff Publication¹⁷ shows entry and exit capacity charges including non-annual entry products, the commodity tariff and a forecast tariff for the current year and the next four years.
 - The Explanatory Note prepared by UR shows the component elements of the tariff including the component parts of allowed revenue, commentary on capacity and commodity forecasts and comparison to previous year's forecasts and tariff.
 - The Explanatory Note is accompanied by a simplified tariff model which is an Excel spreadsheet showing the inputs and the calculations involved in the postalised tariff.
 - The Charging Methodology Statement¹⁸ sets out how charges are calculated.
 - Quarterly updates¹⁹ provide data on actual capacity and commodity to provide a forecast towards the Postalisation Reconciliation Explanatory Note²⁰.

¹⁷ Postalised Tariff Explanatory Note for Gas Year 2024/25

¹⁸ Charging Methodology Statement 2024-25

¹⁹ GMO NI Tariff Publications

²⁰ Postalisation Reconciliation Explanatory Note 2022-23



- 10.4 There are other publications that provide further information, specifically:
 - The annual Gas Capacity Statement which provides users of the gas transmission network with an assessment of the ability of the transmission network to deliver gas over a number of potential scenarios within the next ten years. It contains information on the parameters which need to be justified for the RPM.
 - The GDNs publish the transmission tariffs²¹ as they will apply in their distribution area.
 - The seasonal multiplier factors²² are published by UR annually.
- 10.5 Article 31 of the TAR NC states that it is sufficient to have a link to the relevant documents on a suitable website. GMO NI maintains a transparency table on its website.

Our Proposal

10.6 We consider that the publication requirements continue to be met by the ways outlined below. We are not proposing any changes to how publications are disseminated.

^{21 &}lt;u>Phoenix Transmission Exit Capacity Charge Statement Oct 24 to Sep 25</u> and <u>feDL Exit Capacity Charge Statement GY 2023-2024</u> and <u>Evolve Forecast Network Capacity Statement for Gas Year 2024/25</u>

²² Decision Paper on seasonal multiplier factors 24-25



11. Conclusion

Our Proposals

- 11.1 Largely, the decisions made following the original consultation are still in place five years on, and there have been few, if any, changes in these areas.
- 11.2 We therefore propose to maintain the current Reference Price Methodology, the discounts to capacity charges, the allowed revenue of TSOs, the capacity/commodity split, the view on transmission and non-transmission tariffs, the multiplier and seasonal factors, and the dissemination of related documents.
- 11.3 This is in line with Ofgem's recent decision paper on the TAR NC, where respondents favoured maintaining the current level of multipliers, seasonal factors, and discounts.
- 11.4 We are mindful of the direction CRU will take on their own consultation and note that we will review our approach in view of any changes they may make.



12. Next Steps

- 12.1 We welcome comments on this paper by 5pm 28 March 2025.
- 12.2 Following consideration of the comments received we will finalise our decisions with the intention of publishing a decision paper in quarter one of 2025.

Indicative timetable

Indicative Date	Task	Responsible
February 2025	Publish tariff consultation	UR
March 2025	One month consultation period	All
April 2025	Decision published	UR

Table 2 - Summary of the timetable for the work