GDQ32 – Annex 1:

Errors in Ofgem's Draft Determinations Cost Assessment Model

Contents

List of errors corrected in the Cadent Error Corrected model

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
1	Closed	SGN	GD3_Allowances_File_GD_no RPEs	Cal_[Network]	Issue with Frontier Shift calculation The sum function to calculate the Capex as part of working out the frontier shift excludes 'transport & plant' costs - effectively removing the full amount from allowance as an OE adjustment.	We corrected this in our model in the cells you mentioned (AG116:AK116) and also in cells AG199:AK199 and AG258:AK258 for all GDNs.	Yes
3	Closed	WWU	GD3_Normalisation_File_WW U	Cal_IT&Tele com	Table: Cal_IT&Telecom File: GD3_Normalisation_File_WWU Cells AM18:AP18 should be negative adjustments. Currently in table as positive. Cell AL18 is correct at -£0.23, all other cells in GD3 on that row should be -£0.23	Thanks, this has been amended and all values are -0.23 Hi Mark, is there a reason why this is sensitive? If not could you turn off the confidentiality on this as well please so other GDNs can see the error as well?	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
5	Closed	WWU	Not specified	not specified	We note from Table 9 in the RIIO-3 Draft Determinations Overview Document £5.85m of proposed allowances for RIIO-3 for NZARD UIOLI. We cannot see how this has been excluded from regressions in the model suite or included as UIOLI in the DD BPFM. Please confirm how the £5.85m UIOLI value stated in Table 9 has been treated in the cost assessment models.	Thank you Karen, we have excluded NZARD UIOLI from the regression and it will be included as UIOLI in the BPFM at FD.	Yes
7	Closed	NGN	GD3_Normalisation_File_NGN.xlsx	Cal_IT&Telcom	NGN's implementation of DPLA has been earmarked for technical assessment (project 108 in Work Management & project 111 in IT & Telecom) and been rejected and removed from baseline Totex. However, DPLA implementation is excluded from NGN's baseline totex (as indicated in M8.14 BUS) as we assumed it would be subject to a re-opener. Therefore, NGN consider that the value of our estimated DPLA implementation (£14.26m) has been removed from NGN's allowances in error. Please could you confirm?	These have been removed from the normalisation files.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
7	Closed	NGN	GD3_Normalisation_File_NGN.xlsx	Cal_Work Mgt	NGN's implementation of DPLA has been earmarked for technical assessment (project 108 in Work Management & project 111 in IT & Telecom) and been rejected and removed from baseline Totex. However, DPLA implementation is excluded from NGN's baseline totex (as indicated in M8.14 BUS) as we assumed it would be subject to a re-opener. Therefore, NGN consider that the value of our estimated DPLA implementation (£14.26m) has been removed from NGN's allowances in error. Please could you confirm?	These have been removed from the normalisation files.	Yes
9	Closed	NGN	GD3_Normalisation_File_NGN	Cal_repex	Non Regression Modelled cost adjustments Streetworks • As part of our review of the normalisation adjustments in the cost modelling for draft determinations, we have been reviewing how Streetworks costs have been treated. • Our understanding of the methodology is that the submitted costs for GD3 (which were included in table CV4.14 Street Works BPDT table) are removed through the normalisation file, then restated for the 5 year GD3 period using a 10 year average (less charges and penalties). • Within the NGN normalisation File, there looks to be an error in the which stems from the formula in the	Thanks for flagging. The normalisation file has been updated & this error has now been corrected. Hi Mark, I've had another look at this and cannot see any sensitive information on here. Could you turn the confidentiality off from this please so that other GDNs can see this as well?	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
					Cal_Repex sheet, row 68. The formula does not include the additional filter for the specific cost area (REPEX) and thus incorrectly sums over all the cost lines from other irrelevant cost categories as well. • The formula in Row 68 should be =1*(1/1000)*(SUMIFS(Inp_BPDT_Raw!AP\$10:AP2590,InpBPDTRaw!2590,Inp_BPDT_Raw!2590,InpBPDTRaw!AV10:10:10:AV2590,2590,2590,D68)+SUMIFS(Inp_BPDT_Raw!AP\$10:AP2590,InpBPDTRaw!2590,Inp_BPDT_Raw!2590,InpBPDTRaw!AV10:10:10:AV2590,2590,2590,E68,Inp_BPDT_Raw!\$K10:10:10:K2590,2590,2590,C68)) • NGN have submitted Totex costs in BPDT of £20m for GD3, but £100m has been normalised out of which Repex is £90m. Can you review the above and confirm if the NGN normalisation file needs to be updated to reflect the formula error identified?		

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
11	Closed	Cadent	GD3_Allowances_File_GD_no RPEs.xlsx	Cal_EoE, Cal_Lon, Cal_NW, Cal_WM, Cal_NGN, Cal_Sc, Cal_So, Cal_WWU	In each of the "capex" rows (rows 116, 199, 258), the component parts of capex are summed together. However, the "transport and plant" costs are then deducted. These capex figures feed into totex, which inform the "out_allow" sheet. As a result, the final allowances reported in out_allow do not include allowances for Transport & Plant costs.	Thanks for flagging. This was flagged a couple of weeks ago and is now fixed for all the rows you mention. The fix is to ensure that transport and plant costs are also captured in the capex total. Equivalent to SGN error raised in Gitlab (#1). Corrected by Ofgem.	Yes
12	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_Repex	Ofgem's formula for the streetworks exclusion is incorrect, and picks up all lines in BPDT CV4.14 (including streetworks in other cost areas, and counting individuals lines, subtotals, and totals more than once). This leads to a total exclusion value of £245.1m over GD1-GD3 in Ofgem's model. The correct value for repex streetworks (per NGN BPDT CV4.14) is £23.4m over GD1-GD3.	This has been corrected, thank you.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
13	Closed	Cadent	Final_Determinations-RIIO-GD3_totex_model.do	NA	The calculation of stage B of the BPI for all companies is incorrect. This is due to the efficiency scores being incorrectly calculated. These efficiency scores used for the BPI stage B are calculated in the "Final_Determinations-RIIO-GD3_totex_model.do" file, but are different from those calculated within the "GD3_CostAssessment_File.xlsx" (which are the efficiency scores used to calculated GDNs allowances). The efficiency scores calculated in the STATE DO file are incorrect in two ways. Firstly, the efficiency scores are calculated over the RIIO-GD2 period, rather than the RIIO-GD3 period. Secondly, the efficiency scores are calculated using smoothed totex and smoothed totex CSV, where as they should be calculated using unsmoothed variables. Correction of these two errors results in the efficiency scores in the STATA DO file aligning with those reported in "GD3_CostAssessment_File.xlsx".	I think this issue is more appropriate to raise through the DDQ channel. Can you please submit this as a DDQ. The approach used in STATA is consistent with the GD2 approach. The calculation of stage B of the BPI for all companies is incorrect. The efficiency scores used for the BPI should be the ones in the "GD3_CostAssessment_File.xlsx" file, which is based on the GD3 period.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
14	Closed	Cadent	Normalisation files	Cal_NoncontrollableCosts	In row 66, the formula should be summing rows 23 and 45, the same as the rest of the table. Instead, it is summing rows 67 to 69. This means the GDNs noncontrollable costs are understated.	Thank you for spotting this, the formula has been amended for all GDNs.	Yes
27	Closed	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_IT&Telecom	Ofgem incorrectly excludes £17m (TA - Project 105) for DPLA when costs were not originally in baseline Totex. SGN had proposed this as a re-opener.	DPLA added to baseline costs before removal for technical assessment.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
28	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_IT&Telecom	Ofgem incorrectly excludes £33m (TA - Project 106) for DPLA when costs were not originally in baseline Totex. SGN had proposed this as a re-opener.	DPLA added to baseline costs before removal for technical assessment.	Yes
39	Open	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_Other Capex	Ofgem currently does not exclude capex costs associated with SIUs, despite stating that these costs should be excluded (GD Annex, para. 5.136). Could Ofgem confirm its approach regarding SIU capex?	_	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
55	Open	Cadent	GD3_Normalisation_File_WWU.xlsx	Cal_Emergency, Cal_IT&Telecom	Ofgem applies DPLA/ALD exclusions to Emergency (row 19) and IT&Telecom (row 18) totalling £2.66m over RIIO-GD3. Ofgem then excludes the same account once more on the "TA - project 105" line on sheet "IT&Telecom". Ofgem should remove the "TA - Project 105" line, as it leads to double-counting of the DPLA/ALD exclusion.	_	Yes
59	Closed	Cadent	GD3_Normalisation_File_WWU.xlsx	Cal_OtherCapex	Ofgem applies the DPLA/ALD capex exclusion twice, on rows 20 and 70. Both these rows refer to the same costs (£4.41m over RIIO-GD3). Therefore, Ofgem should remove one of these lines, so as not to double-count the exclusion.	Thanks for spotting this, we will remove these costs from the 'exclusions' section, and keep them in the 'separate assessment'.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
63	Closed	Cadent	GD3_Normalisation_File_Lon. xlsx	Cal_Repex	In row 69, the formula does not pick up services associated with diversions for years 2014-2025. (The formula is correct from 2026 onwards.)	Thank you for spotting this, the formula has been amended to pick up service and mains diversions, correct for all years	Yes
64	Closed	Cadent	GD3_Normalisation_File_Lon. xlsx	Cal_Other Capex	In row 71, the formula does not pick up streetworks costs.	I've just checked the version we sent out and there isn't any data in this line, however in our most recent version of the model we have inputted streetworks data in row 71.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
65	Open	WWU	GD3_RegionalCostIndices	Cal_labour_indices	cells AI82:AI89, the data for 2024 has not been updated for the latest available ONS data (linking back to input sheets 'Inp_ONS_hourly_wages_SOC20' and 'Inp_ONS_hourly_wages_SOC20_2 dig'). We understand that 2024 is currently provisional but will be directionally correct and will be firmed up in time for FDs (with revised ONS AHSE data published October/November annually). We note that Ofgem is currently calculating 2024 by looking at the average of the last 9 years which is significantly increasing the 2024 index value for Lon and So relative to recent years, and in comparison to the 2024 ONS published data. This then has the compound impact of increasing the 5 forecast years. Please can Ofgem correct 2024 for ONS updated data.	_	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
66	Closed	NGN	GD3_Normalisation_File_WM	Cal_Submitte dCosts - >30m iron	Iron >30m' reference is missing from cell H64 file.	Thanks for spotting, formula corrected	Yes
67	Closed	NGN	GD3_Normalisation_File_WM	Cal_Submitte dCosts - Other Policy and Condition Mains	Cell H67 missing 'Other' reference and formulae needs updating to correctly sum Other Policy & Condition mains from BPDTs.	Thanks for spotting, formula corrected	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
69	Closed	NGN	GD3_Normalisation_File_NW	Cal_Submitte dCosts Rows 138 & 139	Rows 138 & 139 appear to have (leftover checks?) values in it in error and should be cleared.	Thanks for raising this, we will look into it. Thank you for spotting this, this has been corrected	Yes
71	Closed	Cadent	GD3_Normalisation_File_WM. xlsx	Cal_Submitte dCosts	Formula in row 64 uses an incorrect reference and hence does not return the correct Repex costs associated with Iron >30m mains.	Thanks for picking up, formula corrected	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
72	Open	Cadent	GD3_RegionalCostIndices.xlsx	Cal_population_density	The Population by local authority data between rows 12 and 362 excludes Non-gas areas. However, the land area data, between rows 366 and 716 does not. Therefore, all the sparsity indices are mis-stated	It is not clear what formula error is referred to here. Rows 12 and 362 are the population of local authorities, and rows 366 and 716 are the land area of local authorities. Please specify what are the error in formula, which rows, and your view on what should be the correct formula. Subsequent Cadent reply: Column R of the tab should show which LAs have "No gas network coverage". The column has been completed for the population data, but not for the land area data. As a consequence, when the GB average population density is calculated in row 1072, the population for areas where there are gas networks is being divided by the land area both for gas and non-gas areas, making	Yes

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						the answer too low.	
						For example, in cell T1072 for 2009, the GB population density for areas with gas is 262. In the comparable file from GD2, for the same year, the equivalent number is 315. The data should not have changed, the issue is that in the GD3 file, the "No gas network coverage" column has not been completed for the land area.	
73	Closed	Cadent	GD3_RegionalCostIndices.xlsx	Cal_populationbyGDN_23	For the population for each GDN from row 366 onwards there is an error in that the same local authority is referenced twice. For example, EoE rows 673 and 674 are for Torridge and Tower Hamlets, both reference population from row 319 (Torridge). Each of the 42 subsequent Local Authorities is also mis-stated, as the cell reference is incorrect by a single row. This causes the proportion of London and EoE GDNs' labour within the capital to be mis-stated which flows through into several other Regional Factor calculations, such as for Productivity.	This is a formula error, and will change the formula from row 366 and below to reference to the correct local authorities for each GDN.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
74	Closed	Cadent	GD3_RegionalCostIndices.xlsx	Cal_labour_indices	Cell AI83 shows the London GDN pay index for 2024. The formula calculates a long term average, rather than using data for the year 2024. Subsequent years should (and do) use the 5 year average	Thanks for flagging this. Aligning with GD2, formula has been amended to use 5 year average (2000-2024).	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
75	Open	Cadent	GD3_LabourRatios.xlsx	Cal_LabourRatios_adjusted	For each activity this tab calculates the labour ratios for each GDN for every year in GD1, 2 and 3, but only calculates an average for GD1 and GD2, which we assume is an error, and should be updated for all 3 periods.	Please specify the rows/columns you're referring to. At the bottom of each block, e.g. row 211 for Work Management, the formula calculates the GD1 & GD2 non-weighted industry average labour proportion, as stated in H211 for example. It is this figure that is then used in the Normalisation. The GD1 & GD2 average was the approach taken in the GD2 modelling, because that covered all the years' data contained in the totex regression. Now that the GD3 period is also included in the totex regression, the average labour % should be made up of the average of all 3 periods, GD1, GD2 and GD3.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
76	Open	Cadent	GD3_LabourRatios.xlsx	Cal_LabourRatios_adjusted	The bottom section of the tab works out labour ratios for Repex. The calculation contains a significant logic flaw, in that it removes Diversions from the calculation - on which substantially all contributions are received - but subsequently uplifts total costs, excluding Diversions, by the Gross / Net ratio for Repex. The latter step is not necessary because Diversions have already been removed, and as a result, mis-states the answer.	Can you be more specific as to rows and columns you're referring to please for each of the points you mention above.

Subsequent Cadent reply:

The Net to Gross uplift in rows 1321 to 1337 is not necessary and incorrect, materially understating the Repex labour proportion. There is only a Net to Gross adjustment because of Repex Diversions, but these have been excluded from this calculation, correctly, because their efficient level of cost is outside the Totex regression. Therefore, by uplifting Total repex costs by the Net to Gross proportion, Total costs are overstated, and the labour proportion understated. The most straightforward example is for West Midlands, because there are no Regional | Yes |

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						Factor adjustments for this GDN. For 2013/14, the table below shows that the DD's labour proportion of 63.58% should be 67.51% instead. The calculations are provided in the attached file, in the same format as the GD3 labour ratios file. (See links to the right in Cols P and Q to image and file)	
77	Closed	Cadent	GD3_RegionalCostIndices.xlsx	Cal_Urbanity_productivity	Column AI has space for data for 2024, that is currently un-populated, but which could be populated using data from the Labour indices tab.	Thanks for flagging this. Formula has been added for 2024 which picks up data from the Labour indices tab to calculate urbanity productivity.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
78	Closed	Cadent	GD3_RegionalCostIndices.xlsx	Cal_Urbanity_productivity	Cells AI53 to AI60 contain productivity indices for 2023. These cells reference the year 2022, with the result that a long term average, rather than the actual data from 2023 is shown.	Thanks for flagging this. Formula has been amended to pick up the actual data for column AI.	Yes
79	Closed	Cadent	GD3_RegionalCostIndices.xlsx	Cal_Urbanity_productivity	Cells AJ53 to AJ60 onwards roll forward using the average values between 2013/14 and 2021/22. Consistent with the GD2 approach, the averages should be of the latest 5 actual years, i.e. from 2019/20 to 2023/24	Thanks for flagging this. Aligning with GD2, formula has been amended to use 5 year average (2000-2024).	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
81	Open	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_LTS Stor & Entry	We note that Ofgem technically assessed SGN's Full Site and System Rebuilds (Gas Distribution Annex, para 5.308). However, the relevant costs for the Sco GDN - £20.95m - were not removed from submitted totex. Could Ofgem confirm whether separate assessment was intended?	_	Yes
82	Open	Cadent	GD3_Normalisation_File_So.xlsx	Cal_LTS Stor & Entry	We note that Ofgem technically assessed SGN's Full Site and System Rebuilds (Gas Distribution Annex, para 5.308). However, the relevant costs for the So GDN - £26.65m - were not removed from submitted totex. Could Ofgem confirm whether separate assessment was intended?	_	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
85	Closed	Cadent	GD3_CostDriver_File	Inp_BPDT_Raw/Inp_Adjusted	Row ID: 10475. WWU - Customer population_Total, failed to pick up the correct value from BPDTs from Yr 2025 to Yr 2031. Sub-components (Row ID 10472-10474) all matched with BPDTs (no recorded adjustments in tab 'Adjustments'). Incorrect data then feed into tab Out_WWUAdjDrivers.	-	Yes
86	Closed	Cadent	GD3_CostDriver_File	Inp_BPDT_Raw/Inp_Adjusted	Row ID: 4668. WM - Distribution_Mains_Diameter Band_A_Asset Population_Volume_km, missing value for Yr 2014.	From what we can see, this value is missing in the WM BPDT submission. We have taken this number from the GD2 final submission, given that it's from 2014, and all other GD1 figures are the same between final GD2 and final GD3 submissions.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
87	Closed	Cadent	GD3_CostDriver_File	Inp_BPDT_Raw/Inp_Adjusted	Row ID: 4676. WM - Asset Population_Volume_km, needs to update accordingly based on the above issue.	-	Yes
88	Closed	Cadent	GD3_CostDriver_File	Inp_Adjusted	Row ID: 10524 -10528. WWU - Safety/Performance_Repair_Deferred_Beyond 28-Days_xxxx_Numbers_No., failed to import the data from BPDTs/Inp_BPDT_Raw for Yr 2017	Corrected	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
89	Closed	Cadent	GD3_CostDriver_File	Inp_Adjusted	Row ID: 10530. WWU - Safety/Performance_Repair_Deferred_Beyond 28-Days_Total_Number_No., will have to update once the above errors are corrected.	-	Yes
90	Closed	Cadent	GD3_SyntheticCosts	Cal_ConnectionsVolumesAggAdj	FPNES has been double-counted for all GDNs across all RIIO-1 and RIIO-2 years within the 'Existing Housing_Mains_≤180mm' and 'Existing Housing_Service_All' categories. An additional criterion needs to be added to the formulae to distinguish FPNES appropriately. It is recommended to revise the formulae across all years and GDNs to prevent similar errors in the future.	I'm struggling to see this one, could you identify the row that is showing the double count?	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
91	Closed	Cadent	GD3_SyntheticCosts	Cal_ConnectionsVolumesAgg	FPNES has been double-counted for all GDNs across all RIIO-1 and RIIO-2 years within the 'Existing Housing_Mains_≤180mm' and 'Existing Housing_Service_All' categories. An additional criterion needs to be added to the formulae to distinguish FPNES appropriately. It is recommended to revise the formulae across all years and GDNs to prevent similar errors in the future.	-	Yes
92	Closed	Cadent	GD3_SyntheticCosts	Cal_ConnectionsVolumesAggAdj	FPNES was triple-counted for SGN SC in 2020 and 2021 within the 'Existing Housing_Mains_≤180mm' and 'Existing Housing_Service_All' categories. FPNES needs to be deducted from the BPDT input, and an additional criterion should be added to the formulae to properly distinguish FPNES.	Formula has been amended	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
93	Closed	Cadent	GD3_SyntheticCosts	Cal_ConnectionsVolumesAgg	FPNES was triple-counted for SGN SC in 2020 and 2021 within the 'Existing Housing_Mains_≤180mm' and 'Existing Housing_Service_All' categories. FPNES needs to be deducted from the BPDT input, and an additional criterion should be added to the formulae to properly distinguish FPNES.	Formula has been amended	Yes
94	Closed	Cadent	GD3_SyntheticCosts	Cal_ConnectionsVolumesAggAdj	FPNES was double-counted for London in 2019, and WM in 2018 within the 'Existing Housing_Mains_Greater than 180mm' category. An additional criterion should be added to the formulae to accurately distinguish FPNES. It is recommended to revise the formulae across all years and GDNs to prevent similar errors in the future.	Formula has been amended	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
95	Closed	Cadent	GD3_SyntheticCosts	Cal_ConnectionsVolumesAgg	FPNES was double-counted for London in 2019, and WM in 2018 within the 'Existing Housing_Mains_Greater than 180mm' category. An additional criterion should be added to the formulae to accurately distinguish FPNES. It is recommended to revise the formulae across all years and GDNs to prevent similar errors in the future.	Formula has been amended	Yes
96	Open	Cadent	GD3_SyntheticCosts	Cal_ConnectionsVolumesAggAdj	The value for 'SO_Non-Domestic_Services_All' in 2020 appears unusually high compared to the preceding and following years, and it exactly matches the value in 'SO_FPNES_Services_All' for the same year. This suggests a potential error in the BPDTs that should be investigated.	Thank you we will raise and SQ to get more information on this submission.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
97	Open	Cadent	GD3_SyntheticCosts	Cal_ConnectionsVolumes Agg	The value for 'SO_Non-Domestic_Services_All' in 2020 appears unusually high compared to the preceding and following years, and it exactly matches the value in 'SO_FPNES_Services_All' for the same year. This suggests a potential error in the BPDTs that should be investigated.	Thank you we will raise and SQ to get more information on this submission.	Yes
98	Closed	Cadent	GD3_SyntheticCosts	Cal_ConnectionsVolumes AggAdj	The values for 'NW_Non-Domestic_Services_All' across all years are incorrect due to erroneous formulae in the input tab 'Cal_Connections_volumes', which incorrectly extract data from 'Inp_BPDT_CapexVolumes_Raw'. An additional criterion needs to be added to distinguish between 'No' and '£m' to ensure accurate data extraction	Criterion added thank you. Formula checked for all networks in this section	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
99	Closed	Cadent	GD3_SyntheticCosts	Cal_ConnectionsVolumesAgg	The values for 'NW_Non-Domestic_Services_All' across all years are incorrect due to erroneous formulae in the input tab 'Cal_Connections_volumes', which incorrectly extract data from 'Inp_BPDT_CapexVolumes_Raw'. An additional criterion needs to be added to distinguish between 'No' and '£m' to ensure accurate data extraction	Criterion added thank you. Formula checked for all networks in this section	Yes
100	Closed	Cadent	GD3_SyntheticCosts	Cal_Reinforce_volumes<>180mAdj	For all Cadent networks, data for the RIIO-2 years should be sourced from the 'Cal_Reinforce_volumesAdj' tab—consistent with the approach used for RIIO-1 and RIIO-3 years—instead of from the 'Inp_WorkloadUpdates' tab.

This adjustment will consequently impact the Reinforcement Synthetic Cost. | Formula has been amended. | Yes |

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
101	Closed	Cadent	GD3_SyntheticCosts	Cal_Reinforce_volumes<>180m	For all Cadent networks, data for the RIIO-2 years should be sourced from the 'Cal_Reinforce_volumesAdj' tab—consistent with the approach used for RIIO-1 and RIIO-3 years—instead of from the 'Inp_WorkloadUpdates' tab. This adjustment will consequently impact the Reinforcement Synthetic Cost.	Formula has been amended.	Yes
102	Closed	Cadent	GD3_RepexVolumesHubModel	Out_RepexVolumesAggAdj	LMP and Grays MP were not excluded for London in the RIIO-2 and RIIO-3 years within the corresponding disaggregated activities. All input tabs used to generate this output tab need to be corrected accordingly.	Thanks for flagging, this has been corrected in the model.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
103	Closed	Cadent	GD3_RepexVolumesHubModel	Out_RepexVolumesAgg	LMP and Grays MP were not excluded for London in the RIIO-2 and RIIO-3 years within the corresponding disaggregated activities. All input tabs used to generate this output tab need to be corrected accordingly.	This error has been corrected and adjustments will feed through to the Out_RepexVolumesAggAdj sheet and not the Out_RepexVolumesAgg sheet. The Out_RepexVolumesAgg sheet has submitted values before any adjustments.	Yes
104	Open	Cadent	GD3_RepexVolumesHubModel	Out_ServicesVolumesAggAdj	IP/MP Services were not excluded for SGN's networks during the RIIO-3 years within the corresponding disaggregated activities. All input tabs used to generate this output tab should be corrected accordingly.	_	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
105	Open	Cadent	GD3_RepexVolumesHubModel	Out_Services VolumesAgg	IP/MP Services were not excluded for SGN's networks during the RIIO-3 years within the corresponding disaggregated activities. All input tabs used to generate this output tab should be corrected accordingly.	_	Yes
107	Closed	Cadent	GD3_MEAV	Inp_BPDT_Raw	The volume figure for WWU "Low-Pressure Gasholders: Mothballed" in 2013/14 is negative.	Hi, yes this was the value given in final BPDT submission	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
108	Closed	Cadent	GD3_MEAV	Inp_BPDT_Raw	The volume figure for NGN High-Pressure Vessels in 2015/16 is negative.	Thanks for spotting, this is a very very small negative number, but should be 0, will correct	Yes
109	Open	Cadent	GD3_MEAV	Inp_BPDT_Raw	The figure for Sc, Storage, "High-Pressure Vessels", "Low-Pressure Gasholders: Operational" increases significantly in 2025 and 2026, then reduces back down to pre-2025 levels. Potentially a reporting error.	We've contacted SGN to check these data points are correct.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
110	Closed	Cadent	GD3_MEAV	Cal_Volumes Adj	Ofgem does not include LNG storage and salt cavities in MEAV - The sum of these should be under "Stor_OtherStor" which is not the case.	Thank you for spotting, formula has been amended and corrected	Yes
111	Closed	Cadent	GD3_MEAV	Cal_Volumes Adj	All networks - Ofgem used asset numbers instead of customer numbers for volume of services. This is inconsistent with GD2.	Looking back at GD2 files, we did use the customer number for total services, this value is hard coded throughout the Cal_VolumesAdj tab for each GDN with the reference line next to each services row stating 'replaced with customer numbers tab 5.09 as per central case submitted 4.4.20'. We are keeping our approach at GD3 consistent with GD2 in this case.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
112	Closed	Cadent	GD3_Repex_SyntheticUnitCosts	Cal_RepexUnitCosts_Rule3_4, Cal_RepexUnitCosts_After3_4, Cal_ServicesUnitCosts_After3_4	Rule 4 (Variation over time) does not include RIIO-3 Data in the calculation (Columns AY and AZ, Row 12 to Row 32).	Formulas have been amended.	Yes
113	Closed	Cadent	GD3_Capex_SyntheticUnitCosts	Cal_ConnectUnitCosts_After3_4	Rule 4 (Variation over time) does not include RIIO-3 Data in the calculation (Columns AY and AZ, Row 12 to Row 32).	Formula amended to include RIIO-3 data.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
114	Closed	Cadent	GD3_Capex_SyntheticUnitCosts	Cal_Connect UnitCosts_After3_4	Rule 4 (GDN's) does not include RIIO - 3 Data in the calculation (Columns AY and AZ, from row 294 onwards)	Formula amended to include RIIO-3 data.	Yes
115	Closed	Cadent	GD3_Capex_SyntheticUnitCosts	Cal_Connect Vol_AfterRule3_4	The 2014-2031 total calculation does not include RIIO-3 Data (Column R, from row 12 onwards)	Formula has been amended.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
116	Closed	Cadent	GD3_Repex_SyntheticUnitCosts	Cal_RepexUnitCosts_After3_4	Rule 4 (GDN's) does not include RIIO-3 Data in the calculation (Columns AY and AZ, from row 294 onwards).	Formula has been amended to include RIIO-3 data.	Yes
117	Closed	Cadent	GD3_Capex_SyntheticUnitCosts	Cal_ConnectUnitCosts_After3_4b, Cal_ConnectUnitCosts_Rule3_4	Rule 4 (Variation over time) does not include RIIO-3 Data in the calculation (Columns AY and AZ, Row 12 to Row 32).	Formulas have been amended to include RIIO 3 data for the following tabs: GD3_Capex_SyntheticUnitCosts > Cal_ConnectUnitCosts_Rule3_4, Cal_ConnectUnitCosts_Rule3_4b, Cal_ConnectUnitCosts_Rule3_4c, Cal_ConnectUnitCosts_After3_4.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
118	Closed	Cadent	GD3_Capex_SyntheticUnitCosts	Cal_Connect UnitCosts_After3_4b, Cal_Connect UnitCosts_Rule3_4	Rule 4 (GDN's) does not include RIIO-3 Data in the calculation (Columns AY and AZ, from row 294 onwards).	Formulas have been amended to include RIIO 3 data for the following tabs: GD3_Capex_Synthetic UnitCosts > Cal_ConnectUnitCosts _Rule3_4, Cal_ConnectUnitCosts _Rule3_4b, Cal_ConnectUnitCosts _Rule3_4c, Cal_ConnectUnitCosts _After3_4.	Yes
119	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_Work mgt	The "TA - Project 108" exclusion appears to refer to Digital Platform Leakage Implementation costs that are not in baseline totex. Therefore, Ofgem should not be making this exclusion.	This exclusion has been removed.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
120	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_IT&Telecom	The "TA - Project 111" exclusion appears to refer to Digital Platform Leakage Implementation costs that are not in baseline totex. Therefore, Ofgem should not be making this exclusion.	This exclusion has been removed	Yes
121	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Maintenance	Formula error in row 109 resulting in incorrect urbanity reinstatement adjustment. Adjustment value should be £0 since So does not report reinstatement costs in its BPDT.	The formula in row 109 has been amended to pick up correct urbanity reinstatement adjustment (£0) for SO from row 107, correct for all years.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
122	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Emergency	Formula error in row 109 resulting in incorrect urbanity reinstatement adjustment. Adjustment value should be £0 since So does not report reinstatement costs in its BPDT.	The formula in row 109 has been amended to pick up correct urbanity reinstatement adjustment (£0) for SO from row 107, correct for all years.	Yes
123	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Repairs	Formula error in row 109 resulting in incorrect urbanity reinstatement adjustment. Adjustment value should be £0 since So does not report reinstatement costs in its BPDT.	The formula in row 109 has been amended to pick up correct urbanity reinstatement adjustment (£0) for SO from row 107, correct for all years.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
124	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_ODA	Formula error in row 109 resulting in incorrect urbanity reinstatement adjustment. Adjustment value should be £0 since So does not report reinstatement costs in its BPDT.	The formula in row 109 has been amended to pick up correct urbanity reinstatement adjustment (£0) for SO from row 107, correct for all years.	Yes
125	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Work Mgt	We note that the line "SGN-GD3-EJP-ELP-001" contains positive values. Could Ofgem clarify that this is meant to be a positive adjustment (i.e., an increase to submitted costs)? Also, could Ofgem clarify which SGN projects this line refers to?	The EJP reference should be 'SGN-GD3-EJP-FLE-001'. This is meant to be a negative adjustment and has now been corrected. The same correction has been done in the Sc network's equivalent sheet. The cost relates to vehicles.	Yes

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected in Cadent model
130	Open	Cadent	GD3_Normalisation_File_[GDN]	Cal_Work mgt	NZARD UIOLI costs should be excluded from regression. This exclusion should be marked as an "Uncertainty Mechanism" in the drop down in column K to ensure that the value gets added back to allowances post-modelling. For the Cadent networks, the values which need to be excluded from the regression can be found in sheet "M.14 BUS" of our BPDTs. These values sum to £8.56m for our EoE network, £5.17m for our Lon network, £6.41m for our NW network, and £4.55m for our WM network.	_	Yes

Sources: Cadent analysis of Ofgem model, GitLab.
Notes: GitLab data correct as of 10 August 2025.

List of issues raised to Gitlab not corrected in the Cadent Error Corrected model

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
6	Closed	WWU	Not specified	not specified	We submitted major Capex projects >£5m for Technical Assessment - EJP 7 (Pipeline replacement HS007) and EJP 9 (pipeline replacement HW009/HW010). The Draft Determinations (WWU Annex, p29, table 16) states we did not submit any projects for Technical assessment, which is incorrect. Please can Ofgem clarify its position relating to these pipelines.	We are aware of these and have made a note of them. We will review these. We have not made any adjustments to the model due to the error relating to this GitLab issue. The issue concerned our proposed treatment of certain costs. However, as this was not an error, this is being dealt with as a methodological clarification through DDQs, rather than as an error through GitLab. (Ofgem reply to all GDNs dated 01/08/25 in response to Cadent email enquiry)	N/A
8	Closed	WWU			Our Business Plan submission included £13.995m of costs relating to Safety Disconnections. The CAWGs clarified that WWU were the only GDN to have included a cost associated the forecast volume of disconnections (other GDNs had included workload and no cost, or non workload and no cost). We can not find any normalisation adjustment in relation to this in the cost models. Please can Ofgem clarify its normalisation/treatment of this.	Thanks for flagging. We have noted this and will look into it. Answered in DDQWWU011 We have not made any adjustments to the model (Ofgem reply to all GDNs dated 01/08/25 in response to Cadent email enquiry)	N/A

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
15	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_Work mgt	"TA - Project 109" appears to refer to ALD costs of £4.9m over RIIO-GD3 (per NGN annex, para. 5.29). Could Ofgem confirm that NGN has included these costs in their baseline totex, and hence this exclusion should be made?	Thanks for clarifying Dean. Cadent note: NGN have clarified that these costs are included in NGN baseline totex.	N/A
16	Closed	Cadent	All normalisation files	Cal_Work mgt, Cal_Emergency, Cal_Repairs, Cal_Maintenance	It is unclear how Ofgem calculates fatigue exclusions. Values are hard-pasted. Could Ofgem please provide backing calculations for these values?	Please submit this request as a DDQ	N/A
17	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_IT&Telecom	We note that values for the "TA - Project 110" exclusion are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
18	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_CEO & Group Mgt	We note that values for the "BO - Project 104" exclusion are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No
19	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_CEO & Group Mgt	We note that values for the "BO - Project 105" exclusion are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
20	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_LTS Stor & Entry	We note that values for the "BO - Project 106" exclusion are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No
21	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_LTS Stor & Entry	We note that values for the "TA - Project 112" exclusion are hard-pasted, and thus we cannot verify the source for these values. Could Ofgem confirm the source of these figures?	Can confirm that these costs are coming directly from the GDNs BPDT.	N/A
22	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_Reinforcement	We note that values for the "Large load connections" exclusion are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
					time the GD2 normalisation files were created.		
23	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_Reinforcement	Ofgem excludes streetworks costs for the entire time horizon (2014-2031), but then adds back GD3 streetworks costs (row 68). As a result, Ofgem keeps GD3 streetworks costs in the regression. Could Ofgem confirm its approach?	Our approach here is to avoid row 79 going negative and in effect taking out more than what is submitted in reinforcement. We understand that it is a clunky way of dealing with this and are looking into refining it.	N/A
24	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_Transport & Plant	Ofgem has an exclusion line labelled "TA - Project 113", but this line is empty. We believe this line should report costs (to be excluded) associated with electric vehicles. Could Ofgem confirm?	Can confirm this is meant to be empty as there are no submitted costs for this project.	N/A

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
25	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_Other Capex	We note that values for the "TA - Project 114", "TA - Project 115", and "TA - Project 116" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No
26	Closed	Cadent	GD3_Normalisation_File_NGN.xlsx	Cal_Other Capex	We note that values for the "TA - Project 117", "TA - Project 118", and "Loss of Development Clause" exclusions are hard-pasted, and thus we cannot verify the source for these values. Could Ofgem confirm the source of these figures?	These are coming directly from the GDNs BPDT.	N/A

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
29	Closed	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_Workmgt	Ofgem's exclusion for Gasholder Demolition also covers costs associated with the maintenance of gasholders at Provan, which Ofgem says should be included in the regression (SGN Annex, paras. 5.36-5.37). We note that costs associated with the maintenance of gasholders at Provan are included in the "opex" line in BPDT CV4.10, and also reported separately in BPDT M8.14.	This has been corrected. Maintenance costs for gasholders at Provan are now included in the regression.	No
30	Open	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_Workmgt, Cal_Maintenance	We note that values for the "Gasholder maintenance" reclassification are hard-pasted, and thus we cannot verify the source for these values. Could Ofgem confirm the source of these figures?	_	N/A
31	Closed	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_Workmgt	We note that values for the "BO - Project 101" exclusion are hard-pasted, and thus we cannot verify the source for these values. Could Ofgem confirm the source of these figures?	The source is the GD2 model file.	N/A

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
32	Closed	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_Maintenance	We note that values for the "BO - Project 102" are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No
33	Closed	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_IT&Telecom	We note that values for the "BO - Proect 103" and " TA - Project 104" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week.	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
34	Closed	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_IT&Telecom	We note that values for the "TA - Project 106" exclusion are hard-pasted, and thus we cannot verify the source for these values. Could Ofgem confirm the source of these figures?	These costs are directly from the GDN's business plan.	N/A
35	Closed	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_LTS Stor & Entry	We note that values for the "Process safety", "TA - Project 107", and "TA - Project 108" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	-	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
36	Closed	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_Transport & Plant	Ofgem has an exclusion line labelled "TA - Project 111", but this line is empty. We believe this line should report costs (to be excluded) associated with electric vehicles. Could Ofgem confirm?	This line should be for electric vehicles and reports zero, but this is intentional and correct	N/A
37	Closed	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_Transport & Plant	We note that values for the "BO - Project 112" and "BO - Project 113" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
38	Closed	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_Other Capex	We note that values for the "BO - Project 103", "BO - Project 114", "TA - Project 115", and " BO - Project 117" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No
40	Closed	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_Repex	We note that values for the"BO - Project 119" and "BO - Project 121" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
41	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Work mgt	We note that values for the "BO - Project 101" exclusion are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No
42	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Maintenance	We note that values for the "BO - Project 102" exclusion are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
43	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_ODA	We note that values for the "BO - Project 103" exclusion are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No
44	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_IT&Telecom	We note that values for the "BO - Project 104" and "TA - Project 105" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
45	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_IT&Telecom	We note that values for the "TA - Project 107" exclusion are hard-pasted, and thus we cannot verify the source for these values. Could Ofgem confirm the source of these figures?	These values are coming directly from the BPDT.	N/A
46	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_LTS Stor & Entry	We note that values for the "Process safety" and "TA - Project 108" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
47	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Reinforcement	We note that values for the "Streetworks - SGN-GD3-EJP-DST-005" exclusion are positive. Can Ofgem confirm that these values should be positive (i.e., leading to an increase in submitted costs)?	Row 68 is to remove streetworks costs from the regression to separately assessed costs, row 69 is to reduce the value of streetworks being removed in line with our engineering proposal in row 18 (EJP - DST - 005).	N/A
48	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Transport & Plant	We note that values for the "BO - Project 111" and "BO - Project 112" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
49	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Transport & Plant	Ofgem has an exclusion line labelled "TA - Project 113", but this line is empty. We believe this line should report costs (to be excluded) associated with electric vehicles. Could Ofgem confirm?	There are no associated costs for this project	N/A
50	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Other Capex	We note that values for the "BO - Project 104", "BO - Project 114", "TA - Project 115", "TA - Project 116", "BO - Project 117", and "BO - Project 120" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
51	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Other Capex	We note that values for the "TA - Project 118" and "TA - Project 119" exclusions are hard-pasted, and thus we cannot verify the source for these values. Could Ofgem confirm the source?	The values in these rows are coming directly from the BPDT.	N/A
52	Closed	Cadent	GD3_Normalisation_File_So.xlsx	Cal_Repex	We note that values for the "BO - Project 122", "TA - Project 124", and "TA - Project 125" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
53	Closed	Cadent	GD3_Normalisation_File_WWU.xlsx	Cal_Workmgt	We note that values for the "BO - Project 101" exclusion are labelled updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No
54	Closed	Cadent	GD3_Normalisation_File_WWU.xlsx	Cal_ODA	We note that values for the "BO - Project 102" exclusion are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
56	Closed	Cadent	GD3_Normalisation_File_WWU.xlsx	Cal_IT&Telecom	We note that values for the "TA - Project 106" exclusions are hard-pasted, and thus we cannot verify the source for these values. Could Ofgem confirm the source?	These values are being copied directly from WWU's BUS table in their BPDT submission, they aren't able to be linked due to not being able to convert the BUS tables into a flat file, hence they are hard coded.	N/A
57	Closed	Cadent	GD3_Normalisation_File_WWU.xlsx	Cal_LTS Stor & Entry	We note that values for the "TA - Project 107" and "TA - Project 108" exclusions are labelled "updated values from GD2 to 2023/24 prices". We understand that Ofgem has taken these values from the GD2 normalisation files and updated the price base. Ofgem should be updating the underlying costs, not just the price base, as these values would have been forecasts at the time the GD2 normalisation files were created.	We are looking into this and will it address it this week	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
58	Closed	Cadent	GD3_Normalisation_File_WWU.xlsx	Cal_Transport & Plant	Ofgem has an exclusion line labelled "TA - Project 109", but this line is empty. We believe this line should report costs (to be excluded) associated with electric vehicles. Could Ofgem confirm?	This line should be for electric vehicles and reports zero, but this is intentional and correct.	N/A
60	Closed	Cadent	GD3_Streetworks.xlsx	Cal_SWSubmitted	Tab is not picking up the Work Management element of Streetworks costs for all our GDNs - therefore this cost is omitted from the 10 year average calculation	Thank you for spotting this, we will amend the formula to include all work management costs.	No
61	Closed	Cadent	GD3_Streetworks.xlsx	Cal_SWSubmitted	Tab is not picking up the Other capex element of Streetworks costs for London and North West GDNs - therefore this cost is omitted from the 10 year average calculation	The formula is correct in Cal_SWSubmitted, there are just not any costs in the input tabs for NW and Lon for Other Capex, Streetworks.	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
62	Closed	Cadent	GD3_Streetworks .xlsx	Inp_WM	The Repair values for 21/22, 22/23 and 23/24 in row 29 do not match the BPDT	Thank you for spotting, formula has been updated to reflect correct submitted data.	No
80	Open	Cadent	GD3_Capex_Syn theticUnitCosts.xl sx	Local	We note that Ofgem indicates that streetworks and reinstatement costs should be removed before calculating Reinforcement and Connections unit costs (column M, rows 99-133). However, in columns AN-AP, the percentage of streetworks within costs is hard-coded to 0 for all networks and all periods. Can Ofgem confirm that this is deliberate (and hence, that streetworks and reinstatement costs should not be removed before calculating unit costs)?	_	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
83	Open	Cadent	GD3_Normalisation_File_Sc.xlsx	Cal_LTS Stor & Entry	We note that Ofgem propose to fund £47.6m for SGN to deliver the 15 projects submitted in the following EJPs: •Full Site and System Rebuilds; Sco - £20.95m / So - £26.65m •Glenmavis System Rebuild and Rationalisation; and •Isle of Grain PRS - Full System Rebuild & Odorant System Replacement. (SGN Annex, para 2.4). This appears to indicate that no additional allowance was provide for Glenmavis and Isle of Grain PRS proposals because the funding amount matches the amount requested for the Full Site and Systems Rebuilds. Could Ofgem confirm where the costs for the Glenmavis proposal have been removed from the regression?	_	No
84	Open	Cadent	GD3_Normalisation_File_So.xlsx	Cal_LTS Stor & Entry	We note that Ofgem propose to fund £47.6m for SGN to deliver the 15 projects submitted in the following EJPs: •Full Site and System Rebuilds; Sco - £20.95m / So - £26.65m •Glenmavis System Rebuild and Rationalisation; and •Isle of Grain PRS - Full System Rebuild & Odorant System Replacement. (SGN Annex, para 2.4). This appears to indicate that no additional allowance was provide for Glenmavis and Isle of	_	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
					Grain PRS proposals because the funding amount matches the amount requested for the Full Site and Systems Rebuilds. Could Ofgem confirm where the costs for the Isle of Grain PRS proposal have been removed?		
106	Closed	Cadent	GD3_MEAV	Inp_Adjusted	The following data points are missing: WWU (M8.03 storage & Capacity): •Linepack_LTS_Linepack: LTS_Adjustments to b/fwd_Volume_mcm/d (2014-31) no data •Linepack_LTS_Linepack: LTS_Revised mcm b/fwd_Volume_mcm/d (2014-31) no data •Linepack_LTS_Linepack: LTS_mcm usable c/f_Volume_mcm/d (2014-31) no data •Linepack_NTS Flex_Linepack: NTS Contracted_Contracted NTS Flex b/fwd_Volume_mcm (2014-31) no data •Linepack_NTS Flex_Linepack: NTS Contracted_Adjustment (Via annual booking)_Volume_mcm (2021-28) no data •Linepack_NTS Flex_Linepack:	Thank you for spotting this, formula has been amended and corrected	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
					NTS Contracted_Usable Flex_Volume_mcm (2014-31) no data		
126	Closed	NGN	GD3_Normalisation_File_WM	Cal_IT&Telecom	There are separate assessment exclusions for Business Support IT & Telecoms on rows 68 & 71 which total £27.79m. However, Business Support IT & Telecoms costs in the BUS table sum to £8.85m. Please could Ofgem reconcile to the BUS or explain and itemise the additional exclusion values?	These values are correct, and the rows of data do come from the BUS table, however we have made adjustments to these projects, hence the values do not match exactly between the normalisation file and the BUS table. These rows of data are correct.	N/A
127	Closed	NGN	GD3_Normalisation_File_WM	Cal_Other Capex	There is a separate assessment exclusion for TA - Project 110 to the value of £19.44m on row 69 which references the BUS sheet. However, we are not able to match it to any figures in the BUS table. BUS IT capex sums to £6.35m. Please could Ofgem reconcile the figures to BUS or explain the source of this exclusion?	These values are correct, and the row of data does come from the BUS table, however we have made adjustments to this project, hence the values do not match exactly between the normalisation file and the BUS table. This row of data is correct.	N/A

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
131	Open	SGN	GD3_MEAV	Inp_BPDT_Raw	Cells: AC536:AM539 | AC633:AM635 MOB population figures for 2014 to 2024 are incorrect and do not align to the figures provided within SGN SQ078.	_	No
132	Closed	SGN	GD3_Normalisation_File_Sc	Cal_Work mgt - Streetworks	Streetwork costs relating to Work Management are not excluded from regression analysis to be incorporated into the non-regression assessment of Streetworks. These costs are shown in the "Inp_BPDT_Raw" tab on row 550 within the Normalisation workbook	This has been resolved	No
133	Open	SGN	GD3_Normalisation_File_Sc	Cal_Other Capex - AMD	TA - Project 118 is the SGN claim for AMD. This was not originally in our baseline totex as we had included as part of NZARD UIOLI which was marked as not in baseline on M8.14 BUS cell AW15. As this has been accepted and funded for GD3 in the DD should a positive exclusion for this value be added and then the process to separately assess will be correct.	_	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
134	Open	SGN	GD3_Normalisation_File_Sc & So	Cal_Governors	GN-GD3-EJP-G&I-002 has had disallowed costs due to partial justification - though all cost has been reduced from Scotland with no adjustment to Southern.	_	No
135	Open	SGN	GD3_Normalisation_File_Sc	Cal_Other Capex - River & Coastal Erosion	SGN-GD3-EJP-DST-008 is in relation to the SGN EJP River and Coastal Erosion which was proposed within our business plan as a re-opener requirement. This was marked in M8.14 BUS under row 12 and listed as not in baseline.	_	No
136	Open	SGN	GD3_Normalisation_File_Sc & So	Cal_Other Capex > Network Integrity	SGN-GD3-EJP-G&I-003 is in relation to Network Integrity which has been partially justified through engineering assessment. The proposed adjustment removes more then the baseline business plan request from Scotland. Can Ofgem verify the split of adjustment with engineering team, and if require support on the split within the SGN business plan please confirm - though note it is	_	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
					included within the EJP on table 10.		
137	Open	SGN	GD3_Normalisation_File_So	Cal_Other Capex > AMD	TA - Project 118 is the SGN claim for AMD. This was not originally in our baseline totex as we had included as part of NZARD UIOLI which was marked as not in baseline on M8.14 BUS cell AW15. As this has been accepted and funded for GD3 in the DD should a positive exclusion for this value be added and then the process to separately assess will be correct.	_	No
138	Open	SGN	GD3_Normalisation_File_So	Cal_Other Capex > River & Coastal Erosion	SGN-GD3-EJP-DST-008 is in relation to the SGN EJP River and Coastal Erosion which was proposed within our business plan as a re-opener requirement. This was marked in M8.14 BUS under row 12 and listed as not in baseline.	_	No

GitLab Ref #	GitLab Status	Raised by	Workbook	Sheet	Description of issue	Ofgem Response	Corrected
139	Open	SGN	GD3_Normalisation_File_So	Cal_Repex > South London MP	With SGN annex para 1.6 - 1.15 & 3.16 - 3.18 Ofgem intend to fund our South London MP project through an ex-ante PCD approach for £30.02m but this figure was not included in our baseline business plan as marked under cell AW13 on the M8.14 BUS tab.	_	No

Source: Cadent analysis of Ofgem model, GitLab.
Notes: GitLab data correct as of 10 August 2025.