

APPENDIX A – CONSULTATION QUESTIONS

A list of the consultation questions is set out below:

- (A) Do you agree with our proposal to leave all modelled passenger and freight EC4T consumption rates unchanged for CP5?
- (B) Do you have any other suggestions to make about modelled consumption rates in CP5?
- (C) Do you agree that it is appropriate to continue using the current uplift factors for electric multiple units?
- (D) Do you agree that it is suitable to continue using the agreed methodology for calculating new modelled EC4T consumption rates, during CP5?
- (E) Do you have any views on our suggestion to uplift modelled consumption rates by 10%, consistent with the surcharge applied for missing metered data?

I can see no justification for this as it should not be Network Rail's place to incentivise use of (impose a fine for not using) meters. If a TOC sees a business case for installing meters it can do so, if not it should not. Rigging the business case artificially is not acceptable.

- (F) Do you have any views on the use of the proceeds from an uplift to modelled consumption rates?

There should be no uplift, so no.

- (G) Do you have any views on applying the uplift to modelled consumption rates to new vehicles only? As above – it is unjustified.
- (H) Do you have any views on whether regenerative braking discounts for modelled usage should remain in CP5 or CP6?

They definitely should. All our testing and modelling shows the 15 – 20% figure is correct. The comments on uncertainty are spurious and don't apply at all to ac.

- (I) Do you have any views regarding provisions to allow us to verify that regenerative braking is being used correctly?
- (J) Do you agree with our proposal to apply a regenerative braking losses factor of 0.9899 (based on losses estimate of 1%) to metered AC regenerated energy?
- (K) Do you have any views on reopening the regenerative braking losses factor for AC after two years during CP5 to reflect emerging information, capped at no less than 0.9744 (losses estimate of 2.5%)?

I see no reason to do this and it creates uncertainty, which is always assessed as a worst case when producing a business case.

- (L) Do you have any views on the other options for charging for metered regenerated energy?
- (M) Do you support the work that we have carried out to quantify AC system losses?
- (N) Do you support further validation of the 4.82% likely to be proposed for CP5?
- (O) Do you have any views on reopening the losses mark-up after two years during CP5 to reflect emerging information? As (K) above.

(P) Do you have any views on not geographically disaggregating the AC losses mark-up?

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(Q) Do you have any comments on the AC losses report published alongside this consultation?

(R) Do you support our proposal to adjust the way the EC4T delivery charge is levied?

(S) Do you support our proposal for all freight traction electricity charges to be based on actual electricity costs faced by Network Rail from the start of CP5?

This sounds sensible, especially if freight gets the benefit of more use of night rate electricity.

(T) Do you support the reform of the EC4T Metering Rules to be widened and renamed the traction electricity rules?

No. We all know what EC4T means, leave it alone.

(U) Are there any other areas which you consider should be included in the new traction electricity rules document?

(V) Do you support the modification of the cost wash-up drafting to allow it to be more accurate and reflect direct price-setting arrangements?

(W) Do you have any views on the cost activities we have included in our EAU cost estimates?

I think the EAU should be rolled into the cost per kWh like the charge for losses. This would be more fair as part of the cost is governed by the maximum demand in the system, so those who consume the most kWh should pay more per mile.

(X) Do you have any views on the variability assumption we have used in our EAU cost estimates?

As (W) above.

(Y) Do you have any views on our proposal to use long-run cost estimates over 35 years instead of 5 years?

(Z) Do you have any views or suggestions about our approach to stakeholder engagement?