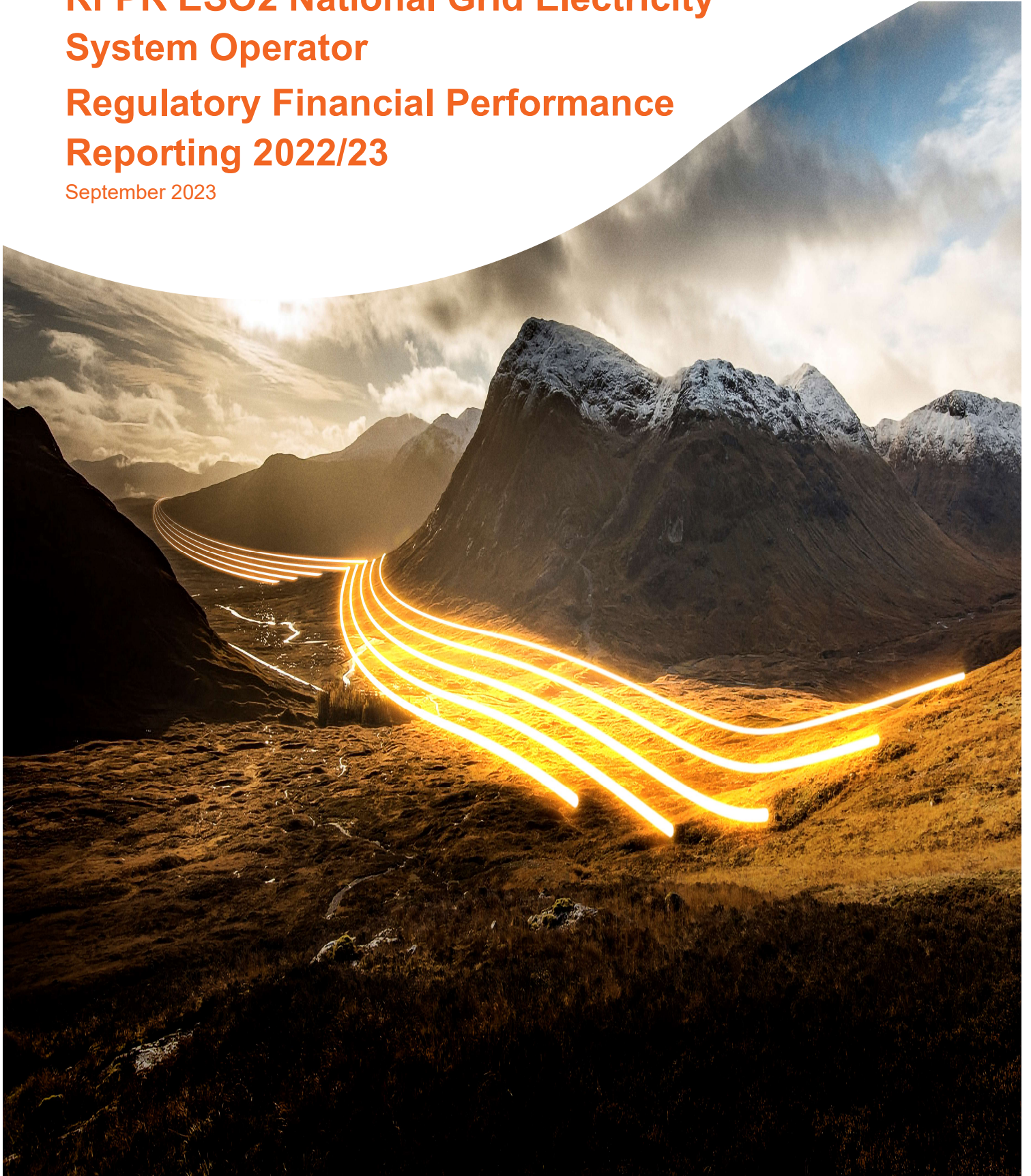


**RFPR ESO2 National Grid Electricity  
System Operator  
Regulatory Financial Performance  
Reporting 2022/23**

September 2023



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# Executive Summary

As the Electricity System Operator (ESO) for Great Britain, we are at the heart of one of the fastest decarbonising and most reliable energy systems in the world. We move electricity around the country second by second to ensure that the right amount of electricity is where it's needed, when it's needed.

Aligned with the UK Government's target, our mission is to drive the transformation to a fully decarbonised electricity system by 2035, which is reliable, affordable, and fair for all. Our five action-oriented ambitions look towards our emerging future role as a new Future System Operator, building on our previous commitments and explicitly recognising the importance of both people and technology in achieving our goal.

As required by Standard Condition B15 of the NGENO Electricity Transmission licence, and in line with the Regulatory Instructions and Guidance (RIGs), this Regulatory Financial Performance Reporting (RFPR) pack sets out some of the elements of our regulatory performance for the period 2022/23.

We note the purpose of the RFPR is to provide a framework to allow Ofgem to collect accurate and consistent information from licensed network operators (licensees). However much of the performance reporting template is not required to be completed by ESO in its unique role as system operator, since performance measures for the ESO are not comparable to those of network operators. In RIIO-2, the ESO's main source of performance reporting continues to be the Electricity System Operator Reporting and Incentives (ESORI) arrangements. These arrangements require that ESO reports against the costs, activities and deliverables as set out in each business plan period. Specifically, we report on plan delivery, metric performance, stakeholder evidence, plan benefits and value for money. Details of our latest performance can be found on our website.<sup>1</sup>

Throughout this document figures are in nominal prices unless stated otherwise.

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<sup>1</sup> [How we're performing under RIIO-2](#)

# Key Operational Performance and Financial Performance Measures

As noted in the Executive Summary the ESO RIIO-2 RFPR does not report on operational and financial performance. Please refer to the RIIO-2 BP1 (2021-23) End of Scheme Report<sup>2</sup> for latest details on financial performance and operational metrics.

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<sup>2</sup> [2021-23 End of Scheme Report](#)

# Overview of Regulatory Performance

## R1 - RORE

The Return on Regulatory Equity (RoRE) figure is a key measure by which Ofgem compares operational and financing performance across asset-based Network Operators. The methodology is not a useful comparator for assessing the performance of System Operators as they are service based, not asset based, organisations.

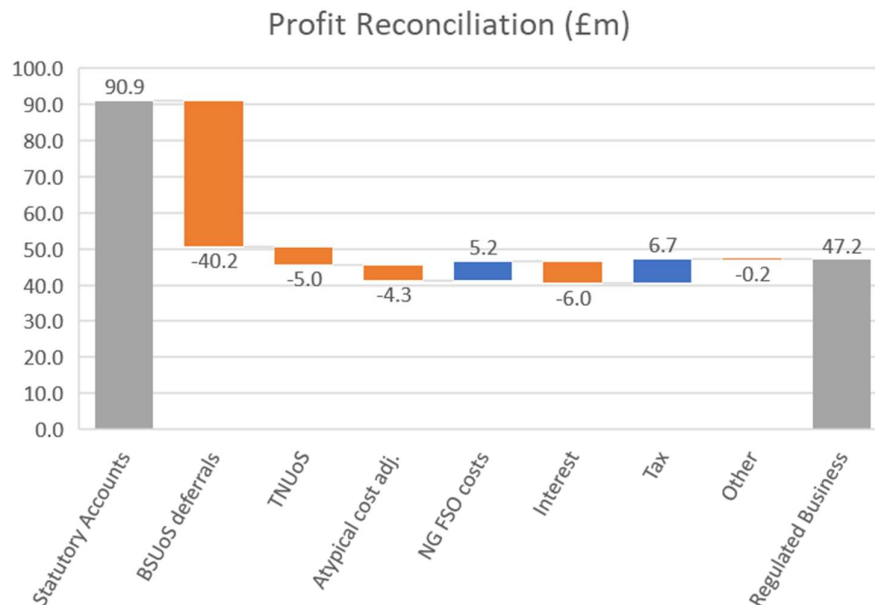
This table is not required to be completed for ESO as stated in Table A1.1 in the RIGs.

## R2 - Reconciliation to Revenue and Profit

The first part of table R2 reconciles Regulated Network Revenue, as reported in the latest published PCFM, to the revenue as reported in the ESO statutory accounts.

For the 2022/23 charging year ESO Allowed Network Revenue is fully collected through Balancing Services Use of System (BSUoS) charges, without under or over recovery. Therefore, allowed and collected revenues are both £383.6m. The reconciling differences between collected revenue and turnover per the statutory accounts relate to other regulated revenue streams which do not form part of the allowed revenue in the PCFM, namely external balancing revenues of £4,149.0m and TNUoS revenues of £46.4m.

The second part of table R2 reconciles the Regulated Network Profit to the profit per the statutory accounts. Profit per the statutory accounts of £90.9m is £43.7m higher than that per the Regulated Business. The key variances are shown in the chart below.



*BSUoS deferrals (-£40.2m)* – the statutory accounts reflect the collection of BSUoS costs deferred under CMP381 from 2021/22 (-£41.3m) and deferral of BSUoS costs under CMP395 for 2022/23 (+£1.1m). This revenue stream is not part of allowed revenues in the PCFM.

*TNUoS (-£5.0m)* – this is the net balance of TNUoS revenues and costs in the statutory accounts. Over time TNUoS costs and revenue are equal and these charges are not within allowed revenue in the PCFM.

*Atypical cost adjustment (-£4.3m)* – this variance reflects the differing treatment between statutory and regulatory cost reporting such as provision movements and recognition of lease and pension costs.

*NG FSO costs (+£5.2m)* – the statutory accounts recognise an accrual for FSO separation costs incurred by National Grid plc, which will be charged to ESO and recovered through ESO allowed revenues once relevant licence changes have been made.

*Interest (-£6.0m)* – this variance relates to the difference between statutory and regulatory net interest with the key driver of the difference being interest relating to TNUoS activities which are excluded from the definition of regulatory interest.

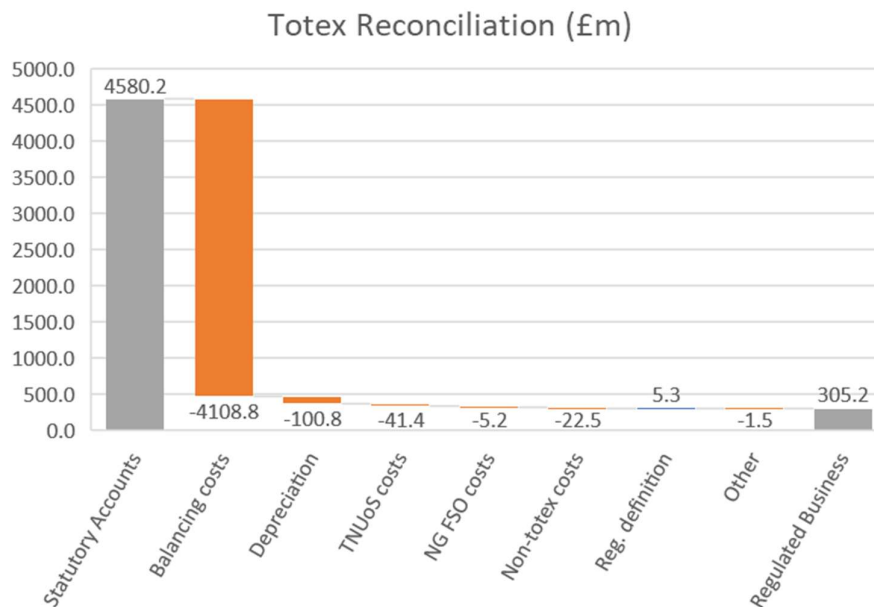
*Tax (+£6.7m)* – this is the difference between the corporation tax charge per the statutory accounts and the tax allowance per the PCFM. A key driver of the higher tax charge in the statutory accounts is the tax due on the collection of BSUoS costs deferred from 2021/22 under CMP381.

### R3 - Totex – Reconciliation

As per RIGs guidance we have not completed rows 13-105 of this template.

The ESO does not report ‘net costs after non-price control allocations’ in its RRP submission. We have therefore adjusted operating costs per the statutory accounts to remove costs not reported in our PCFM i.e., costs associated with external balancing and TNUoS pass through costs as well as costs incurred by National Grid for FSO programme costs, which will be recharged to ESO. Due to the differing formats of networks and ESO RRP tables we cannot cross reference cells in row 162 to our RRP submission, which therefore results in an erroneous check in row 166.

ESO’s overall totex expenditure as per the ESO RRP for 2022/23 is £305.2m, compared to total expenditure per the statutory accounts of £4,580.2m. The main reconciling differences are:



*Balancing costs (-£4,108.8m)* – external balancing costs are charged directly to suppliers and generators and do not form part of ESO totex.

*Depreciation (-£100.8m)* – statutory accounting depreciation is not classified as totex.

*TNUoS costs (-£41.4m)* – costs associated with licence fees, cross border trading and TNUoS bad debt are recovered through TNUoS charges and are not classified as ESO totex.

*NG FSO costs (-£5.2m)* – costs National Grid has incurred on its FSO programme, which will be ultimately recovered by ESO through BSUoS charges.

*Costs not recovered through totex in the PCFM (-£22.5m)* – costs such as pension deficit, BSUoS bad debt, business rates and innovation costs are recovered through separate terms in the PCFM and not included in totex.

*Differences between statutory and regulatory definitions of expenditure (+£5.3m)* – certain items of expenditure are treated differently for regulatory purposes for example the RIGs instruct that we include costs on a cash basis exclusive of provisions and accruals and prepayments that are not incurred as part of the ordinary level of business.

There is an erroneous check on line 198 of this worksheet as the cells in row 198 are locked and therefore do not allow an input of RRP reported totex.

## R4 - Incentives and Other Revenue

Although Table A1.1 states that no input is required for Table R4 Incentives and Other Rev from ESO, we note that the intention is for the ESO Reporting & Incentive Arrangements (ESORI) output incentive section of this table to be completed once Ofgem's decision for years 2021/22 and 2022/23 has been published. This decision was published on 31<sup>st</sup> August 2023.

The ESO is assessed on its performance in RIIO-2 using an evaluative approach under the ESORI Arrangements.

To provide flexibility for the ESO to adapt to changes in the energy system, the RIIO-2 period is split into three business plan cycles: BP1 (2021-23), BP2 (2023-25) and BP3 (2026). Under the ESORI Arrangements, the ESO must engage with its stakeholders and publish a Business Plan before the start of each business plan cycle. The Business Plan outlines the details of the ESO's costs, activities, and deliverables for delivering its strategy over the course of the business plan period.

The ESO reports on its performance throughout the business plan cycle and at the end of the business plan cycle. The Performance Panel (an independent panel of experts and stakeholder representatives) assesses the ESO's performance and provides a recommendation to Ofgem. All available evidence is then reviewed by Ofgem who determine a financial penalty or reward for the ESO for the relevant business plan cycle.

The ESO completed its first business plan cycle (BP1) in 2022/23 and published the End of Scheme Report in May 2023. This has since been reviewed by the Performance Panel and Ofgem who have determined a reward of £1.8m for the BP1 period. We have presented this reward as having accrued evenly in nominal prices over the BP1 period. For further details please refer to Ofgem's End of BP1 decision on ESO performance 2021-2023 publication<sup>3</sup>.

## R5/6 - Financing and Net Debt Position

### Overview

As agreed with Ofgem and outlined in the RIGs, for the purposes of completing the RFPR, regulatory net debt for ESO excludes debt used to finance TNUoS assets and liabilities and therefore the Financing and Debt tables have been completed on this basis. There are several lines within the tables which remove items relating to TNUoS.

The debt and interest forecast extends to 1 April 2027 which is the maturity date of the ESO long term loan from National Grid. Due to the transition to FSO and the uncertainty around the future funding structure we have not included a forecast for ESO's other debt instruments, which are short term and for management of working capital and which do not impact on regulatory net debt.

### R5 Financing

Table R5 reports the annual actual and forecast Net Interest per the RIIO-2 regulatory definition. This is then adjusted to remove the impact of inflation and compared to the cost of debt allowance as published in the latest PCFM. This deduction of inflation in the interest charge is made on the assumption that debt is inflation linked, which is not an appropriate assumption for ESO as all debt is

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<sup>3</sup> [End-Scheme decision on the Electricity System Operator's performance 2021-2023](#)

floating rate debt. For this reason and given the high rate of inflation of 8.8% for 2022/23, we consider the reported out-performance in 18/19 prices of £7.9m at actual gearing (£13.5m at notional gearing) is overstated.

The ESO statutory accounts report a Net Interest income of £3.6m for 2022/23. The Regulatory Net Interest per table R5 is a charge of £2.4m. The main difference relates to £7.5m of interest earned which relates to our role in TNUoS revenue management which is excluded from the definition of Regulatory Net Interest. There is a further adjustment of £1.1m to exclude the fees associated with our undrawn working capital facility.

### R6 Net Debt

Table R6 reports the actual and forecast regulatory net debt as per the RIIO-2 definition. It also provides a reconciliation to the actual Net Debt per the statutory accounts.

Net debt per the statutory accounts was -£395.6m. After adjusting for the net debt associated with TNUoS assets and liabilities of £-443.0m, the Regulatory Net Debt was £46.0m. This represents a reduction of £73.9m over the prior year, where there was a £67.0m dividend payment. There were no dividend payments in 2022/23.

### R7 – RAV

The Opening RAV, Transfers, Net additions (after disposals), and Depreciation values are based upon the September 2023 Dry Run 2 PCFM submission. The Total Return on RAV (row 45) equals the Dry Run 2 PCFM submission.

### R8- Taxation

The tax liability per the CT600 for the 2022/23 regulatory year is £5.8m. In table R8 we have made adjustments to exclude the tax impact from external balancing and TNUoS activities. The adjusted regulated tax liability of £6.6m is therefore £1.1m higher than our tax allowances per the latest PCFM of £5.7m. Our tax under performance in 18/19 prices is £0.8m at actual gearing and £1.1m at notional gearing.

## R9 - Corporate Governance

### Corporate Ownership and Governance Framework

#### Corporate ownership structure

National Grid Electricity System Operator Limited's immediate parent company is National Grid Holdings One plc. The ultimate parent company, and controlling party, is National Grid plc. Both companies are incorporated in Great Britain and are registered in England and Wales. National Grid plc consolidates the financial statements of National Grid Electricity System Operator Limited.

The ownership structure, with each parent company holding 100% of the subsidiaries shares is shown below:





### National Grid Electricity System Operator Limited Board Members

Name	Office	Date of appointment
Fintan Slye	Executive Director and Chair	1 March 2019
Paul Plummer	SID <sup>4</sup>	1 April 2019
Kayte O'Neill	Executive Director	1 April 2019
Hannah Nixon	SID	1 April 2019
Baroness Gillian Merron	SID	1 April 2019
John Linwood	SID	16 June 2020
Zoe Morrissey	Executive Director	15 November 2022
Regina Moran	SID	1 August 2020 (Resigned 31 December 2022)
Gregg Smith	Executive Director	4 May 2020 (Resigned 14 November 2022)

### Committees

The ESO Board has delegated certain governance responsibilities to four standing committees that have the knowledge and experience to make recommendations to the Board, each of which have documented terms of reference. Each committee is chaired by a SID and the SID members provide independent challenge and support for effective decision making.

The Board and its committees regularly review terms of reference to ensure that they remain fit for purpose, are adapted to promote good governance, and meet the requirements of the Company as they evolve. At each Board meeting, directors receive reports on the key discussion items, activities and recommendations from the Chairs of the committees that have met in the period.

Committee	Activity
<b>Audit &amp; Risk Committee</b>	The Audit & Risk Committee (ARC) monitors the effectiveness of internal controls; risk management; integrity of financial statements; and the performance of the internal Assurance and Corporate Audit department and independent auditor.

<sup>4</sup> Sufficiently Independent Director

<b>Nominations Committee</b>	<p>The Nominations Committee makes sure the Board remains balanced and effective and that its structure, composition, and skills align to the ESO’s strategic objectives, and has due regard for diversity. The Committee’s primary objective is to identify and evaluate candidates for future SID appointments and in doing so, it takes advice from external recruitment consultants.</p> <p>The committee also has oversight of the succession plans for the Executive Leadership within the ESO, Executive remuneration and benefits (including discretionary elements); and input on the remuneration and benefits framework applicable to the Executive Director to the Shareholder.</p>
<b>Business Separation Compliance Committee</b>	<p>The Business Separation Compliance Committee oversees the duties and tasks of the ESO Business Separation &amp; EMR Compliance Officer with the focus upon compliance with the business separation licence and EMR licence conditions.</p>
<b>Health, Safety &amp; Wellbeing Committee</b>	<p>The ESO is dedicated to ensuring the highest standards of health, safety and wellbeing for all staff, going beyond compliance with legal requirements and adopting a good practice model that benefits everyone. To support the Board with this ambition, it established the Health, Safety &amp; Wellbeing Committee, with responsibility for nurturing and promoting a positive attitude to health, safety and wellbeing as an integral part of the ESO’s activities and to maintain an overall assessment of the key ESO health, safety and wellbeing specific risks.</p>

Below is a summary of the committee structures and members:

	Audit & Risk	Compliance	Nomination	Health, Safety & Wellbeing
John Linwood*	●		●	●**
Baroness Gillian Merron*		●	●**	
Hannah Nixon*	●**		●	
Paul Plummer*	●	●**		●
Fintan Slye			●	
Kayte O'Neill	●			
Zoe Morrissey		●		

\*SID \*\*Chair

### Matters reserved for the parent company

As a wholly owned subsidiary, the Board duly considers the views and interests of its ultimate Shareholder, National Grid plc, as part of any major decisions and transactions, where this is appropriate in the context of its licence obligations around legal separation.

National Grid Group Board, the decision-making committee of National Grid plc the ultimate shareholder of the ESO, is responsible for ensuring the long-term viability and prudent financial management of the National Grid Group. Arrangements are in place to both enable appropriate Group oversight but also enable the ESO to operate sufficiently independently within the National Grid Group.

A Group level committee, the ESO Committee (ESOC) supports operational and managerial separation of the ESO, and independence of the ESO Board. It is chaired by the CEO of National Grid Group. The purpose of ESOC is to consider and provide oversight in respect of matters relating to the ESO which are to be considered by the Board and/or are matters which would fall within the scope of the authority of the Group Executive. The duties also include guiding ESO in its relations with

shareholders / stakeholders, keep under review internal controls, risk management and compliance performance. The ESOC also considers strategic implications that are pertinent to ESO and monitors safety, financial and operational performance and approves certain expenditure and other financial commitments in respect of ESO matters which exceed the authority of the ESO Board. ESOC ensures all ESO ringfenced information required to support good corporate governance is viewed separately from other subsidiaries in the National Grid portfolio.

The ESO Committee is chaired by the CEO of National Grid Group and attended by the Chair of the ESO Board, the Group General Counsel and Company Secretary and the Group Chief Financial Officer. The ESOC has delegated authority from the National Grid Group Board with a defined financial delegated authority and its own terms of reference to support the Group's interaction with the ESO by reviewing and approving matters within its delegated authority on behalf of the Group. The ESO Committee is not involved in the day-to-day operation of ESO.

The Articles of Association<sup>5</sup> and Matters Reserved to the National Grid Group Board<sup>6</sup> describe the remit of the public limited company (plc) and are available on the National Grid website.

The areas of ESO activity that have visibility or require approval at Group Board level through ESOC include matters such as:

- approval of the ESO's annual budget
- review and approval of the ESO's long-term rolling financial forecast
- visibility of the ESO's financial performance against its annual business plan
- visibility of the ESO's principal risks
- approval of any material extension of the ESO's activities into new business areas or any decision to cease to operate any part of the ESO's business
- authorisation of changes affecting the capital structure of the ESO
- approval of the long-term strategic objectives of the ESO and any major changes to the size and composition of the ESO Board and its Committees
- unforeseen issues that have significant or material impact on the Group (e.g., financial, reputational, or principal risks).

ESO Standard Articles also cover shareholders rights which include:

- the right to appoint or remove a board director
- the right to declare a dividend within the ESO Board recommendation of the dividend amount.

## Executive Remuneration Policies

The NG plc Remuneration Committee is responsible for recommending to the NG Board the Remuneration Policy for NG plc Executive Directors, the other members of the Group Executive Committee (Presidents of respective Business Units), the Executive Director of the ESO (subject to independence), and the NG Chair, and for implementing this policy. The aim is to align the Remuneration Policy to the Company strategy and key business objectives, and ensure it reflects our shareholders', customers', and regulators' interests. The NG plc Remuneration Committee receives input on policy implementation within the wider workforce before reaching decisions on matters such as salary increases and annual incentive pay-outs and closely reviews the appropriateness of pay positioning by reference to external measures (benchmarking remuneration packages) and internal review of Company performance and pay gaps (NG Group CEO pay ratios, gender and ethnicity pay gaps), the relativity year-on-year of salary, benefits and annual performance incentives compared with the same for the rest of the workforce. The budget for annual salary increases for all other Leaders (Executives, Senior Managers and Managers) is set at NG level and allocated to individuals with reference to factors outlined above.

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<sup>5</sup> [Articles of Association of National Grid plc](#)

<sup>6</sup> [National Grid plc Board Governance](#)

## ESO Board of Director Remuneration Framework

Band	Target APP % of Salary	LTIP Award	Pension DC Contribution	Car Allowance	PMI	Holiday	Flexible Benefits
Executive Director (Band A)	32.5%	Up to 90% of base salary	20%	£12,000	Family	28 days annual leave (plus public holidays)	A range of benefits including a Sharesave scheme, employee assistance programme, and flex benefits scheme
Executive Director (Band B/B+)	17.5 - 25%	40 – 75% of base salary	15%*	£8,500 - £12,000	Family*		

\*Any new hires will be eligible for Pension DC Contribution of 12% and Employee only PMI

### Annual Remuneration Increases

The level of remuneration for the Executive Director and Chair of the ESO is reviewed and approved annually by the National Grid plc Group CEO. Remuneration levels for the other ESO Executive Directors are reviewed and approved annually by either the ESO committee or the responsible Shared Service area where they are not directly employed by the ESO.

### Performance Related Remuneration

Performance based elements of remuneration form a significant portion of the total remuneration package for the Executive directors of the ESO. Typically, performance-based (Reward at risk) elements account for 50-60% of the total remuneration opportunity; these are linked to both business performance measures and individual performance and typically comprise an annual element (the Annual Performance Plan, APP) and a longer-term element (the Long-Term Performance Plan, LTIP).

### Short-Term Incentives

The Annual Performance Plan (APP) comprises reward for achievement against ESO scorecard measures and achievement against individual objectives. Performance measures and targets are normally agreed at the start of each financial year and are aligned with ESO strategic business priorities. Targets are set with reference to the budget, which is reviewed and approved annually by the ESOC.

Individual performance will be determined by an assessment of the achievement of objectives set at the start of the financial year and demonstration of leadership behaviours and business values. Operational performance of ESO during the year will be assessed against metrics and targets set at the start of the financial year. The ESO Committee will also, where appropriate, reflect on business outcomes not directly included in the APP, such as items related to demonstrating service levels to our customers and communities before finalising the plan pay-outs.

Awards are subject to malus and clawback provisions.

### Long-Term Incentives

ESO operates a cash based long-term incentive plan (LTIP) under which awards may be granted to directors and senior managers each year, with the intention to provide an appropriate incentive to ESO employees and to encourage outstanding long-term performance of the ESO business. Vesting occurs at the third anniversary of the award with the vesting value flexing with the value of the ESO business during the vesting period. The ESO Committee reserves the right to apply discretion on overall vesting outcome taking into consideration the underlying business, financial and operational performance.

LTIP awards are subject to malus and clawback provisions.

### Employee Benefits

Benefits for Executive Directors and senior management include company car (Electric Vehicle) or a cash alternative, private medical insurance, personal accident insurance, life insurance, opportunity to

purchase additional benefits under flexible benefit schemes available to all employees and opportunity to participate in HMRC tax-advantaged all-employee share plans, currently:

- Sharesave: UK employees may make monthly contributions from net salary for a period of three or five years. The savings can be used to purchase shares at a discounted price, set at the launch of each plan period.
- Share Incentive Plan (SIP): UK employees may use their gross salary to purchase shares. These shares are placed in trust.

### Pension

Externally hired employees will participate in a Defined Contribution (DC) arrangement. The maximum contribution for Executive Directors is shown in the table above. Executive Directors may alternatively choose to receive cash in lieu. In line with market practice, pensionable pay for employees is basic salary.

### Recognition Scheme

All employees are eligible to receive awards under the NG recognition programme. Awards may be made to recognise significant efforts of an individual and could potentially be related to service levels to our customers and communities. These awards tend to be small in value and tend to be given to employees further down the organisation.

### CEO Pay Ratio

We have disclosed our CEO (The Executive Director) pay ratios comparing the CEO single total figure of remuneration to the equivalent pay for the 25th quartile, median, and 75th quartile UK employees (calculated on a full-time equivalent basis). The results highlight a key feature of our remuneration strategy to weight Executive and senior leadership compensation more heavily towards longer-term performance reward. Across the wider workforce, employee compensation is largely focused on in-year annual delivery.

For reference, the NG plc Group-wide pay ratio and NG UK ratio are disclosed in the NG plc Group Annual report.

The ratios are based on total pay and benefits inclusive of short-term and long-term incentives applicable for the respective financial year 1 April – 31 March. The reference employees at the 25th, 50th and 75th percentile have been determined by reference to pay and taxable benefits as at the last day of the respective financial year, 31 March, with estimates for the respective APP pay-outs and performance outcomes of the LTPP and dividend equivalents.

Most employees are eligible for a performance-based annual payment. Our principles for pay setting and progression in our wider workforce are the same as for our executives – mid-market approach to total reward sufficiently competitive to attract and retain high-calibre individuals without over-paying.

### Dividend Policies

The Board has a residual dividend policy which considers the company's operating and investment requirements and ensures compliance with regulatory and licence conditions.

Specifically, the Board determines the level of dividend declared by reference to:

- an assessment of the Company's ability to finance its functions in the short term and maintain the Company's investment grade credit rating
- the Company's cumulative financial performance and past outperformance
- the regulatory gearing level of the Company.

The Directors also have regard to:

- ensuring that the Company meets its statutory and regulatory obligations
- employees' interests.

## R10 – Pensions & Other Activities

Apportionments between Established and Incremental Deficit are driven by the outcome of the 2020 Pension Deficit Allocation Methodology (PDAM) exercise. The figures shown in rows 14 and 15 are both derived from the 2020 PDAM exercise and are consistent with apportionments shown in last year's 2021/22 RFPR disclosures (sheet "R10 - Pensions & Oth Activities").

Regulated fraction apportionments between NGETO (75.7%) and NGESO (23%) are historic and unchanged since their confirmation at TPCR4 Rollover Final Proposals document. The figures shown for ESO are both derived from this regulated fraction apportionment and are consistent with apportionments shown in 2021/22 RFPR disclosures.

Ofgem have previously acknowledged that pension costs, particularly deficit costs disclosed in table R10 are largely outside of the direct control of network operators. Nevertheless, where some element of pension cost mitigation is possible, National Grid has consistently sought to reasonably reduce pension costs associated with its defined benefit pension schemes, as detailed in our 2020 submission to Ofgem's Reasonableness Review which formed part of the 2020 PDAM exercise.

That said, ESO pension deficit payment (in row 12) is once again broadly in line with previous years and remains consistent both with expectations and with figures submitted as part of the RIIO-2 budget submissions for pension deficit payments.

The pension scheme valuation is performed tri-annually, and the valuation data presented in the 2022/23 RFPR reflects the finalised results of the triennial actuarial valuation at 31 March 2019 (which is the most recent set of valuation results accepted by Ofgem).

The Established Deficit Element (EDE) and Pension Payment History (PPH) figures shown in rows 21 to 23 reflect the most recent final pension allowances published by Ofgem on 9 November 2020 following Ofgem's decision outcome from the 2020 PDAM exercise.

## Data Assurance Statement

The RFPR submissions have been completed in line with the Ofgem Data Assurance Guidelines (DAG) process. This mandates a fully documented 2 level review process. The overall submission and regulatory judgments have been signed off at Director level.

In summary, the following assurances were completed:

1. Assurance Template completed by Data Provider
2. First Level Reviewer
3. Second Level Reviewer
4. Independent Expert Reviewer (where deemed appropriate)
5. Director Sign Off

# Appendices

## Reconciliation

Not applicable for ESO.

## Enduring Value Adjustments

Not applicable for ESO.

## Basis of any estimates and allocations

Not applicable for ESO.

## Other Relevant Information

Not applicable for ESO.

Faraday House, Warwick Technology Park,  
Gallows Hill, Warwick, CV346DA

[nationalgrideso.com](http://nationalgrideso.com)

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