



Jonathan Rodgers
Senior Executive, Access & Licensing
Office of Rail and Road
25 Cabot Square
London
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23 January 2023

Dear Jonathan,

First Trenitalia West Coast Rail Limited (FTWCRL) response to Network Rail's Representations to Avanti West Coast's (AWC) 2nd and 3rd Supplemental Agreements

Thank you for the opportunity to respond to Network Rail's letter dated 6th January 2023 regarding our 2nd and 3rd Supplemental Agreements (SAs). To summarise, these SAs cover:

- **2nd Supplemental** – additional Liverpool services to operate from December 2023.
- **3rd Supplemental** – (a) reinstatement of services to Glasgow Central from December 2023 that were temporarily removed during Covid, for which AWC previously held Access Rights for. This restores an hourly service from Birmingham to Scotland. (b) additional Blackpool services that will help to ease overcrowding on some of our busiest Anglo-Scottish services.

We welcome Network Rail's support for our proposals, but challenge why it is only possible for the additional Liverpool and Blackpool services to be introduced from May 2025 rather than earlier as requested by us. In our opinion, neither a clear rationale, nor demonstrable evidence for Network Rail's position in relation to the network performance and/or traction power supply issues used to justify this later start date for the additional services has been provided.

The connectivity benefits delivered by the additional services covered by these SAs are key to delivering on our contractual Franchise obligations (specifically Train Service Requirement 3) as committed to the Department and reflect the design and use of capacity of the December 2022 Concept Train Plan. This approach will enable AWC to introduce the capacity and customer connectivity benefits and return on investment (including in new rolling stock) in line with ORR's Track Access Guidance (The Use of Capacity 28 July 2021) and is supported by DfT. DfT supports these additional passenger services being introduced as soon as practicable, taking account of factors including driver training and stock availability.

2nd SA – additional Liverpool services

We accept that a phased approach to introduction will reduce the risk to delivery and some of the additional Liverpool services will temporarily not be able to operate until after May 2024, for the reasons Network Rail has stated in its letter in relation to Euston platforming. However, we cannot see a justifiable reason why most services need to wait until May 2025, which is explained later in this letter. Introduction of the additional services as soon as possible is important because AWC's new Class 807s have an equivalent seating capacity to that of a 9 car Class 390, and are expected to be required from December 2023 in order to provide sufficient seating capacity. Deployment of the Class 807 trains will also realise further growth and connectivity through enabling AWC services to call at Liverpool South Parkway.

AWC is currently unable to accept the position that Network Rail set out in its letter dated 6 January 2023 in relation to traction power supply or the recommendation that our additional Liverpool services should run in diesel mode north of Crewe from May 2025. The Class 807 is not a bi-mode train, so this is not a viable option.

3rd SA – additional Blackpool services

In December 2019, AWC operated 3 trains in each direction between London Euston and Blackpool North via the Trent Valley route with Class 390 rolling stock. We do not understand what is preventing reinstatement of one of those three train services back to the former service level. In the 14 Platform Capacity Study issued in June 2022, reinstatement of this service could be accommodated with no issue and has not been modelled as an option to determine the impact. The additional Blackpool service is linked to our proposal to re-instate Birmingham services to/from Glasgow from December 2023, and without this additional Blackpool service AWC would not be able to offer any direct off-peak services to and from Blackpool.

3rd SA – Re-instatement of Glasgow services

We welcome NR's support of our proposal to re-instate these services to/from Glasgow from December 2023.

Electrical Modelling Recommendations (Traction Power Supply)

We note the issues with the power supply at Gowkthrapple are now actively being addressed via the planned commissioning of a new feeder location at Currie. We do however challenge the stated requirement for the Auto transformer upgrade for the Crewe-Weaver area as a dependency for deploying the Class 807 electric rolling stock and this has not been raised specifically in previous Network Rail representations.

Network Rail have provided modelled data showing up to 500A current draw by pairs of Class 90s associated with non-compliant low voltages attributing these instances to the presence in section of the additional AWC Class 807 services. This is believed to be above the capabilities of this rolling stock type (and UK standards) and needs validation.

We have previously seen excessive current ratings for rolling stock in modelling cause substantial deflation of voltages at feeder section extremities of the type that Network Rail are suggesting here in the Crewe North and Euxton areas of their work.

We have met with Network Rail on this issue and been shown evidence of up to 420A current draw by Freightliner trains departing Crewe Basford Hall northwards and their acceleration from low speed on

the Down Slow north of Crewe giving long durations at extremities of the feeder section, which supports Network Rail's modelling to this level.

We have sought information on the current limits applicable to double-headed Class 90 operation, where we understand that a modification to restrict current draw was implemented but have, as yet, had no information on the setting agreed. If this information demonstrates that the current should be considered capped at a materially lower specific value, then it may be necessary to rerun that modelling with the correct power draw data. This is because we believe that in every scenario identified it is the 2 x Class 90 freight train that will be seeing the non-compliant voltage and the current of that train is critical.

We do therefore challenge the stated requirement for the Auto transformer upgrade for the Crewe-Weaver area as a dependency for deploying the Class 807 electric rolling stock. However, we remain keen for a collaborative approach to continue as demonstrated by our joint work with Network Rail to mitigate traction power supply concerns in other areas, such as Acton Lane and Scotland. This will enable us to reach the most acceptable solution for all Operators and Network Rail.

Platform Utilisation Modelling Analysis

It is positive to see that Network Rail have rigorously tested the different options and concluded that, "there was no evidence to suggest that the timetables would not be able to recover in the perturbation scenarios simulated." However, there do appear to be several inconsistencies in the report.

In the December 2023 Timetable with 14 platforms available, the SME score is the same with the additional Liverpool services and the T-3 and T-5 both improve by 1% and 2 % respectively. This is not consistent with the text in Table 1 and throughout the report, which suggests that the impact is considerable. AWC would concur that introducing an additional 1tph at the same time as Platform 15 is unavailable is a high risk, and we believe that a phased approach to introduction would mitigate this risk.

In our view, an important simulation to inform the ORR decision making is missing from the analysis. Since Grand Union do not intend to start running services until May 2025, we would recommend there should have been a May 2024 analysis with only AWC Liverpool services added and not both Grand Union and AWC Liverpool services. If the December 2023 14 platform timetable with the AWC Liverpool services was modelled with platform 15 left in reserve (noting the current plan for platform 14 to be out of use for a c. six-month period), it would not be expected to pose problems and would add a level of robustness not offered at any other busy terminus station. Therefore, we do not believe Network Rail have reasonable grounds to require 16 platforms to be available before AWC can introduce all the additional London Euston to Liverpool services.

The increment between December 2023 only AWC Liverpool services, and May 2024 Grand Union and AWC Liverpool services in the modelling period 06:00 to 20:00 is 6 arrivals; the two AWC services that could not be accommodated in the 14 Platform Capacity Study issued in June 2022 and up to four Grand Union services. If there are only six extra trains and one additional platform then we would expect the position to improve, as indicated in the Spare Platform Capacity and On Time Metric for T-3 and T-10. Therefore, we would recommend Network Rail justify the quote in the report it is, "Just about end-of-story."

In reference to the Operational mitigations, AWC drivers do sign Euston Up Sidings.

WCML Performance Partnership

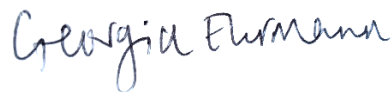
We are supportive of Network Rail's proposal to establish a full WCML performance partnership, to involve all Fast Line operators and Network Rail, in order to jointly develop and agree a resource plan, ensuring that the increased fast line quantum can be implemented robustly. This remains key to resilient service delivery and will build on and complement our existing joint performance strategy and planning activity, alongside other Operators.

Conclusion

We continue to work collaboratively with Network Rail and other Operators in the spirit of the activity embodied by the Events Steering Group to develop, and now fully realise the benefits of the December 2022 timetable structure. We therefore welcome Network Rail's support in principle for our proposals.

As noted above, we challenge Network Rail's position regarding performance and traction power supply, for which the rationale and evidence have not been fully demonstrated, and consider it possible for the additional access rights we have requested to commence earlier than May 2025. However, we remain keen to work closely with Network Rail and ORR as further analysis is undertaken to help resolve their concerns.

We thank ORR for its ongoing dialogue with us and welcome any further questions.



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Avanti West Coast