



Responses to ORR's 12 December 2024 consultation on PR24 matters to be determined

Link to consultation webpage: [Periodic review of HS1 Ltd 2024 \(PR24\) | Office of Rail and Road](#)

Contents:

1. [Eurostar International Ltd](#)
2. [Rail Partners](#)
3. [Southeastern Trains Ltd](#)
4. [Department for Transport](#)
5. [HS1 Ltd](#)
6. [Network Rail \(High Speed\) Ltd](#)

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Feras Alshaker
Director, Planning & Performance
Office of Rail and Road (ORR)
25 Cabot Square
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Sent by email: [REDACTED]

17 December 2024

Dear Feras,

Periodic Review of HS1 Ltd 2024 (PR24) Final Determination

Thank you for the opportunity to respond to your consultation on your proposed determinations of HS1's Five Year Asset Management Statement (5YAMS) for Control Period 4 (CP4).

We support your approach to uphold your key determinations with respect to the renewals and NRHS O&M cost envelopes, namely

- the imposition of a 4% efficiency reduction of all renewals costs, reflecting a lack of HS1-specific cost data;
- the imposition of a 9% efficiency reduction of renewals in asset categories deemed to suffer from a lack of asset knowledge; and
- the imposition of a reduction to the O&M charge of £11.5m over CP4.

These efficiency challenges are important to hold HS1 and its key supplier NRHS properly to account, ensure that the management of the HS1 asset is delivered in an efficient manner and set up well for future demand while protecting its users from inefficient costs being passed on to them.

The principle of the regulator having the duty and ability to set an efficient cost envelope is of utmost importance to preserve the integrity of the regulatory system and its objectives. We fully agree with your assessment that while the regulator cannot intervene in commercial contracts, such contracts also cannot undermine the regulator's objective and ability to set an efficient cost envelope. The commercial contracts between HS1 and its suppliers are for HS1 to manage in such a way that it can deliver asset management in a cost efficient way.

As you know, as part of our response to the Draft Determination we provided evidence to you why we considered there was scope for further reductions in the O&M charge in particular, but also the renewals cost envelope, beyond the scope of your draft determinations. We are therefore disappointed that you reduced the scale of the O&M charge cost reduction rather than increased it. We would have welcomed the opportunity to review the evidence on which you relied that led you to lower the cost reduction since without it the justification for it is not clear to us.

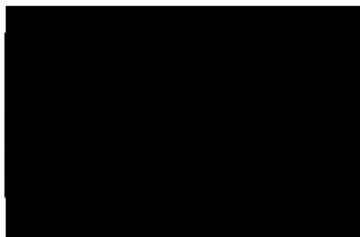
We note that there are other areas in which HS1's revised 5YAMS did not adopt the ORR's draft determinations but where we understand the ORR may still overrule HS1's positions but did not need to consult on again under the terms of the Concession Agreement. This is particularly the case with respect of amendments to the Access Terms and Conditions that ORR continues to discuss with stakeholders beyond the consultation on the Draft Determination and in parallel to this consultation. In this context, we note that where consensus cannot be reached between stakeholders, it is the ORR's obligation to make determinations in the best interests of the HS1 system's customers, ie passengers and cargo shippers. There should be no presumption that HS1's chosen approval or rejection of specific amendments are the default position.

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In summary, therefore, we support the determinations you put forward in your consultation, notwithstanding our belief that additional cost reductions would have been available. Your Final Determination will be an important foundation on which future development and growth of the use of the HS1 asset can build, and we thank your team for their efforts over the course of this process to bring about this positive outcome.

Yours sincerely



Gareth Williams

Eurostar General Secretary

Rail Partners' response to ORR's periodic review of HS1 Ltd 2024 (PR24) – consultation on matters to be determined

In line with our response to ORR's draft determination, we support ORR's proposed determination regarding HS1 Ltd's estimated renewals costs, and acknowledge the proposed reduction in HS1's Route Operations and Maintenance (O&M) charge.

The context

Rail Partners notes that there is potential for international rail freight growth on HS1 Ltd infrastructure under the right conditions, and that there are a number of parties interested in operating new international open access passenger services which would introduce competition to this market. It is important that the regulatory framework supports the introduction of new services to support the financial sustainability of HS1 Ltd and provide additional options for passengers and freight customers.

The freight and logistics sector is highly price sensitive with customers operating on low margins and rising charges have driven modal shift from freight customers towards more carbon intensive modes – particularly road haulage. Although charges remain at a level that is prohibitive for many freight customers, the proposed reduction in freight charges set out in the draft determination was a welcome first step that will help to improve the competitiveness of rail freight.

In this context, it is vital that HS1 Ltd's costs and charges are set at an efficient level in order to facilitate this potential growth.

Renewal costs

We understand that ORR has not received new analysis from HS1 Ltd relating to renewals costs since its draft determination and therefore considers that its previous decisions remain appropriate. We support this decision.

We recognise the risk that renewals annuities may need to increase in future control periods if the reduced renewals charges prove insufficient to fund the long-run renewal costs of the network. However, this must be balanced against the strong incentive that these lower cost estimates create to drive efficient delivery, and as such we consider that this risk is acceptable.

Setting a stretching target for renewals efficiencies at this point incentivises the right behaviours from HS1 Ltd during control period 4 (CP4), and gives HS1 Ltd time to consider how it can most efficiently deliver its renewals in future control periods. In the absence of a stretching target, there is a risk that opportunities for efficiency are not explored, and inefficiencies become baked into the projected future cost base. As these costs are ultimately passed on to train operators through the charges they pay, a higher cost base would reduce the commercial viability of existing and prospective passenger and freight services using HS1 Ltd infrastructure.

Setting charges at an efficient level today may also give operators an opportunity to become more established during CP4. This is particularly important given the heightened level of interest from new entrants to provide services on HS1 Ltd infrastructure, and the government's aspirations to grow rail freight volumes by 75% by 2050.

If it becomes clear that renewals charges will need to increase in the future, despite the strong incentive that ORR's decisions places on HS1 Ltd to identify efficiencies, it is vital that this is communicated to users of the HS1 network with as much notice as possible.

O&M charges

ORR has reviewed further analysis from HS1 Ltd and Network Rail High Speed (NR HS) relating to O&M, and is minded to determine that the efficient cost HS1 Ltd can pass on to operators is reduced by £11.5m compared to HS1 Ltd's Five Year Asset Management Strategy. This is a smaller reduction than the £14.7m reduction ORR proposed in its draft determination.

In our response to ORR's draft determination, we supported the proposed £14.7m reduction to O&M charges. The smaller reduction now proposed will mean that higher costs are ultimately passed on to the users of the HS1 network, including freight services which operate within the highly price sensitive logistics sector. However, we recognise the balance that ORR must strike in enabling HS1 Ltd to finance its operations and plan its business with a reasonable degree of assurance.

As outlined above, setting challenging cost efficiency targets helps drive the right incentives on HS1 Ltd to reduce its supplier costs. Without stretching efficiency targets now, there is a risk that inefficiencies become baked into the O&M cost-base permanently. During CP4, ORR should continue to monitor HS1 Ltd's O&M costs closely.

Office of Rail & Road
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19th December 2024

ORR Consultation on Matters to be Determined – Southeastern Response

Dear Sir/Madam,

Thank you for your letter dated 12th December 2024, that set out the two areas where the ORR intend to determine.

Southeastern welcome the opportunity to respond to this consultation and remain supportive of the continued levels of engagement and efforts to control costs for the system.

Following on from the significant inefficiencies identified in the Draft Determination, Southeastern are very supportive of the proposed determination for renewals and route O & M efficiencies. However, we would like to understand what evidence has been provided to support the proposed reduction from the £14.7m set out in the Draft Determination to the £11.5m set out in your letter.

Southeastern acknowledge that the workstream to make the required amendments to the Passenger Access Terms is still ongoing and offer our continued support to achieve a positive outcome.

During recent discussions, HS1 have remained adamant that they were not supportive of the introduction of an annual fixed cost wash up. We note that the ORR have not listed this item as something that they intend to determine on. Can confirmation that this workstream will be seen through to fruition be provided?

Whilst also not included within ORR's consultation, we would like to reiterate our concerns around the international train path forecasts used by HS1 in its November 2024 submission. Despite EIL being comfortable with the forecast used in the May submission (and there is strong evidence to support their forecast with actual paths operated increasing over the past few years), HS1 has chosen to reduce the forecast significantly and in fact to a level that by the final year of CP4 is still some 718 paths lower than the May 2024 forecast for the first year of CP4. As a direct consequence of the reduction in international paths forecast, Southeastern will incur significantly higher OMRCA1 costs over CP4 (which are then compounded by the excessive indexation of charges) and HS1 directly benefit from any international paths operated in excess of the reduced HS1 forecast. We strongly encourage the ORR to instruct HS1 to propose a far more realistic international path forecast rather than one that simply disproportionately favours HS1, disadvantages operators and ultimately hinders the growth we all seek.

In conclusion, Southeastern once again, thank the ORR for their engagement in this process and welcome the outputs that support the affordability of the use of the HS network.

Southeastern look forward to your response and to receiving the Final Determination in due course.

Yours sincerely,



Susan Ellis
Track Access & HS1 Contracts Manager



Let's talk



Department for Transport

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19 December 2024

Dear Feras,

Thank you for inviting us to comment on your second consultation entitled "Consultation on Matters to be Determined" (published 12th December 2024). We are grateful for the opportunity to set out Government views on your consultation.

Overall View

The Department notes that you accept the majority of HS1's revised plans. However, we also note there are a few aspects that you do not accept and that you propose to determine those elements of the Operations, Maintenance and Renewals Charge that you consider to be inconsistent with HS1's general duty.

The Department continues to welcome the ORR's decisions in these matters and believes the decisions to be consistent with the Department's position as set out in our consultation response dated 11th November.

Renewals Annuity

As per our consultation response, we support the ORR's decision to reduce the renewals annuity by a further £1.9m and stations annuity by £0.9m. As stated previously, we believe these efficiencies to be achievable and that the evidence led approach is a good outcome.

Operation and Maintenance Charge

We note that the ORR has determined a lower Operations and Maintenance Charge, reflecting a reduction in costs of £11.5m over CP4 (£2.3m a year) based on new evidence received. The Department supports the ORR's decision in this area and believes that this efficiency is achievable.

Thank you again for the opportunity to comment on this second consultation.

Yours sincerely,

Patricia Idaewor

19 December 2024

Feras Alshaker
Director, Planning & Performance
Office of Rail and Road
25 Cabot Square London

Dear Feras,

RE PR24 proposed Final Determination consultation

We are pleased that, following scrutiny of HS1's revised proposals, the ORR considers the majority of HS1's plans and costs are consistent with our General Duty. We welcome the opportunity to comment on those elements of the operating, maintenance and renewals charge that the ORR proposes to determine.

Please find HS1's comments below.

Renewals efficiency opportunities

We welcome the ORR's recognition of the uncertainty and the potential that as a result of the ORR proposed renewals cost reduction the operators' charges may need to rise in PR29. It is HS1's role as a good infrastructure manager to consider and raise such risks to the long-term sustainability of the HS1 network. However, following this acknowledgement by the ORR of the uncertainty and risk that HS1 has raised, HS1 accepts the ORR's judgement of the appropriate renewals efficiency assumptions for the Final Determination.

NR(HS) O&M efficiency opportunities

We are pleased that the ORR has taken the additional evidence NR(HS) provided into account and has adjusted its position on the efficiency opportunities for NR(HS)'s Annual Fixed Price. As HS1 does not have sight of NR(HS)'s detailed commercials, we rely on the ORR's scrutiny in this area. However, we also understand that enabler costs have been subject to recent discussion between NR(HS) and ORR and we understand NR(HS) is providing further evidence on this as part of this process. We encourage the ORR to consider this additional evidence carefully to ensure that NRHS plans are appropriately funded.

Further correspondence

We noted that EIL provided the ORR with further views regarding HS1's revised 5YAMS, which we feel we need to address. This correspondence suggested that HS1 identified additional costs and amended train path forecasts late in the process leaving very little time for stakeholders to scrutinise. The changes we made were

in response to external developments at the time, and these were necessary to ensure that the revised 5YAMS proposals were reflective of the efficient costs that HS1 would incur in CP4. HS1 provided detailed evidence and justification for this in our 5YAMS and supporting documents, which EIL and other stakeholders received. We expect the ORR will scrutinise and determine if these are efficient as it has done on our other proposed plans and costs.

I wish you, and the ORR team a happy Christmas and a prosperous new year. Please do not hesitate to contact me if you wish to discuss any aspects of this letter.

Yours Sincerely



Mattias Bjornfors

Chief Regulatory and Strategy Officer

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19th December 2024

Sent by email: PR24@orr.gov.uk

Dear Feras,

Network Rail (High Speed) Ltd Response to the ORR PR24 Draft Determination – Consultation on Matters to be Determined (Public Version)

1. Introduction

- 1.1. Network Rail (High Speed) Ltd (NR (HS)) has reviewed the PR24 Draft Determination consultation, issued by the Office of Rail and Road (ORR) to HS1 stakeholders by email on 12th December 2024 and published on the ORR's website on matters it proposes to determine; this letter sets out NR (HS)'s response.
- 1.2. NR (HS) confirms that this letter can be published and be made publicly available by the ORR. Some parts of our letter contain confidential and commercially sensitive information; this has been redacted, as shown by [.] in this public version. A separate confidential version of our letter will be submitted to the ORR.
- 1.3. The ORR has set out two matters in its consultation that it proposes to determine; a reduction to cost estimates for renewals in CP5-CP11, and a reduction to the Route Operations and Maintenance (O&M) charge in CP4. We have set out our response to each of these matters further below.

2. Cost Estimates for Renewals in CP5-CP11

- 2.1. As part of the periodic review process, NR (HS) is required under its Operator Agreement with HS1 Ltd to submit with its 5YAMS a 40-year volume-based renewals plan and to have costed the first 5-years of this plan. HS1 Ltd provide a cost estimate for the remaining 35 years. As the ORR has acknowledged in its consultation, HS1 Ltd developed a Cost Policy to forecast the long-term renewals costs for CP5-CP11.
- 2.2. It is important to note that whilst NR (HS) was not directly involved in the development or application of the HS1 Cost Policy, we want to ensure that there is sufficient funding for future control periods, as we know there is a further significant increase in renewals volumes from CP5. We note the ORR's position that there is uncertainty and potential for charges to rise at PR29, and that ORR will seek to use the 5-yearly periodic review process to address this uncertainty.

3. Route Operations & Maintenance (O&M) Efficiencies

- 3.1. The ORR has proposed to determine a lower O&M charge, reflecting a reduction in costs of [.] per year lower than the NR (HS) Annual Fixed Price submitted in its 5YAMS to HS1 Ltd, totalling [.] over CP4. We are pleased to see that some of the additional evidence and rationale provided to the ORR in our last consultation response on 11th November 2024 has been acknowledged and taken into account, resulting in this revised position. However, as we outlined in our previous consultation response, this level of additional efficiency is not achievable within the next control period. We understand that the Final Determination will apply to HS1 Ltd as the regulated entity, but the ORR is identifying potential efficiencies in NR (HS)'s cost base and we urge the ORR to review all evidence submitted by NR (HS) and reconsider its position.
- 3.2. The ORR Draft Determination had set out an additional efficiency stretch of [.] over CP4, suggesting that opportunities exist through accelerating asset management maturity and/or changes to contractual arrangements between NR (HS) and HS1 Ltd. It is positive to see that the ORR has consolidated this into an overall (and reduced) efficiency stretch of [.] over CP4. However, we are concerned by the lack of any detail available in this additional consultation document, with only one page each on ORR's position regarding O&M charges and Renewals CP5-CP11 estimates. It is surprising that ORR are seemingly giving gravitas to high level assertions made by other HS1 stakeholders but not considering the detailed response and evidence we have submitted from the last consultation. With the ORR consulting again on charges to operators, there remains a lack of credible and robust analysis to support this position. From this additional consultation document, NR (HS) is unable to ascertain what elements of either asset management maturity acceleration or contractual arrangements have been revised in ORR's assumptions to determine that [.] over CP4 is the efficient cost for HS1 Ltd to pass onto operators. It is also unclear from this consultation if the ORR is expecting this [.] to be flat line phased over the control period at [.] per year; we would remind ORR that this imports additional deliverability challenges if this level of efficiency stretch is introduced from year 1 of CP4.

NR (HS) Management Fee and Enablers

- 3.3. We are pleased to see that the ORR has taken some of our additional evidence and rationale into account in relation to our management fee and enablers. As explained in our previous consultation response, the NR (HS) management fee was independently benchmarked by economic consultants [.] taking into account the risk profile in which we deliver our services to HS1 Ltd and wider system stakeholders, and adjusted for 'other costs' (such as enablers) to ensure a robust comparison – this is further discussed in response to enablers later in this letter. It should be noted that NR (HS) remains open to exploring the HS1 system risk, reward and incentivisation framework with all system stakeholders to reach a mutually agreeable, efficient outcome for the system centred around the common goal of excellent and efficient train service performance. However, this requires all HS1 system stakeholders to engage in this process during CP4, in order to implement any agreed changes through the next periodic review process (PR29) in time for CP5.

- 3.4. With regards to the consideration of enablers, again, this is a positive revision by the ORR. However, given the overall efficiency stretch has only reduced from [.] to [.] (i.e. [.] over CP4) and the ORR previously challenged [.] of our investment enablers, there is no detail provided in this consultation as to what specific elements of our investment enablers have been accepted. Additionally, there is a lack of credible and robust analysis to support any rejection of the remaining enablers from the Annual Fixed Price. We understand from correspondence between our parent company [.] and the ORR during and following the ORR consultation period for the Draft Determination, that the ORR felt strongly that the enablers should be self-invested by NR (HS) via its management fee rather than passing these costs onto operators. For the avoidance of doubt, we have specifically highlighted the key evidence which the ORR has either missed or misunderstood from our previous consultation response below, to ensure this is considered by the ORR. Additionally, we have appended a supporting statement from [.] on the relationship between the investment of enablers and the management fee. This section should be read in conjunction with [.]
- 3.5. We have been clear from the outset of the PR24 process that to derive further efficiency would require a step change in asset management and therefore a step change in investment, to mature our asset management approach as the asset is ageing and move from manual to automated intervention and digitisation. We have previously explained that the enablers included in our 5YAMS are necessary to support delivery of all efficiencies in CP4, and to provide for efficiency to be sustainable into future control periods for which the HS1 system is the sole beneficiary. HS1 Ltd have also indicated strong support for our enablers within their Draft Determination response, which is also acknowledged in this additional consultation.
- 3.6. ORR seemingly support NR (HS)'s CP4 strategies for O&M but do not support passing on all enabling investment to operators on the basis that a comparator organisation would self-invest, specifically in the case of human capital. Whilst this is understood to be commonplace in some industry sectors such as consultancies, it is not applicable on the HS1 network.
- 3.6.1. Firstly, the HS1 infrastructure is the only operational high speed railway in the UK and comes with a [.] we are contracted to manage; [.] of which our frontline teams are competent in when executing inspection and maintenance.
- 3.6.2. Secondly, the skill set held by the maintenance teams resides with the system; should NR (HS) no longer be the [.] the investment made in human capital would transfer from the [.] and therefore the system remains the sole beneficiary of this investment.
- 3.6.3. Thirdly, NR (HS)'s CP4 plan requires a step-change in asset management to achieve the maturity in data quality, automation of regimes and a move from time to risk based maintenance. Whilst we have proposed system and technology changes seemingly supported by ORR, ORR has rejected funding for the enablers associated with human capital investment (i.e. our [.]). The asset management efficiencies proposed for CP4 cannot be delivered by system and technology investment alone; [.] to achieve the step-change in new ways of working in what is a completely bespoke high speed system. [.] Therefore, it is unreasonable and irrational to propose that NR (HS) or [.] should self-invest in human capital in order to deliver sustainable efficiency for operators/system

benefit on the HS1 system, without consideration for how it is funded and remunerated i.e., its profit margin/management fee.

- 3.7. It is important to remember that the NR (HS) management fee that was benchmarked by [.] for this periodic review, directly considered the operational profit of comparator organisations. Importantly, the benchmark analysis did not differentiate between operating costs directly charged to customers, or those seen as an internal ‘overhead’ cost which would be offset against contribution from individual contracts. The equivalent of these enabler costs would be included in comparator organisations’ operational costs and any profit returns realised after deducting these costs. Therefore, if NR (HS) applied the same methodology as other comparators, then the management fee would need to be re-benchmarked and is likely to result in a higher percentage to cover any excluded enabler costs, [.] It is also important to note that if enablers are funded from the management fee, then by definition, they are discretionary since the funds available from the management fee cannot be guaranteed for enabler investment if they are required to cover emergent risk.
- 3.8. In summary, we have again set out the explanation on the necessity of our enablers to deliver the committed efficiencies and the benchmarking of the NR (HS) management fee above, together with the evidence provided during PR24 and additionally the economic advice from [.] appended to this and the previous consultation response. If the ORR Final Determination still results in the exclusion of these investment enabler costs from the [.] then NR (HS) will be left with no choice but to consider the basis for reviewing this matter judicially. We will also need to [.] in order to meet our contractual obligations [.]

NR (HS) Risk Funding and Accelerating Asset Management

- 3.9. We note in this consultation that the ORR believe our previous consultation response on risk funding and accelerating asset management maturity “do not go far enough in addressing the opportunities that we identified in our Draft Determination”. This is disappointing to see, given the additional evidence and rationale we had provided in the previous consultation response, and the lack of evidence or rationale from the ORR in this latest consultation to substantiate its position.
- 3.10. As we outlined in the previous consultation response, the contract risk fund is designed to compensate NR (HS) for [.] These risks, [.] are asymmetric and can only lead to a reduction in profit margins; if these risks do not crystallise, NR (HS) receives no benefit. In effect, the contract risk is set equal to the expected cost of the events it is designed to cover. We undertook a Quantified Cost Risk Assessment (QCRA) from which we took a [.] probability rating, based on the asymmetric risk exposure to NR (HS) under both the performance regime and the [.] which has existed since CP2. It is also important to reiterate that NR (HS) has historically reduced the contract risk value in each of the previous control periods; [.] The value of the CP4 contract risk is in line with the average actual spend over the past two control periods.
- 3.11. In summary, NR (HS) does not accept ORR’s proposal to reduce the Contract Risk value and is concerned by the lack of credible and robust analysis to support this position. If the ORR’s Final Determination confirms that the P-value should be reduced from [.] to ORR’s proposal

of [.] , then NR (HS) propose that the system should hold the risk. Should any risk materialise in CP4, then NR (HS) will not be liable in the Control Period.

- 3.12. Regarding acceleration of asset management maturity, NR (HS) in its previous consultation response has outlined the specific activities already contained within its 5YAMS and underpinning asset management strategies. We have proposed the same level of acceleration ORR are proposing and therefore believe the additional asset management acceleration is duplicated. From the Draft Determination it was not clear what additional actions the ORR believe would improve maturity across the asset areas, how this is funded and delivered, and/or how it generates or accelerates efficiency specifically for O&M, over and above what NR (HS) has already committed to for CP4. This additional consultation provides no further detail to substantiate ORR's position and it appears to be an arbitrary decision. Additionally, this also goes against further meetings that have been held between NR (HS), [.] and the ORR on asset management maturity acceleration since the last consultation, whereby clarification was sought and did not result in additional activities being identified so it is unclear what opportunity ORR believes is attainable within the next control period over and above the level of maturity and efficiency proposed.
- 3.13. In summary, NR (HS) does not accept the ORR's proposal for additional asset management maturity acceleration and the lack of credible and robust analysis to support ORR's proposal is concerning.
- 3.14. Additionally, the NR (HS) 5YAMS already includes a stretch efficiency within its [.] for the purpose of setting the ambition to go further which it would appear the ORR have not considered.

4. Other Matters in Relation to the NR (HS) 5YAMS

- 4.1. [.]

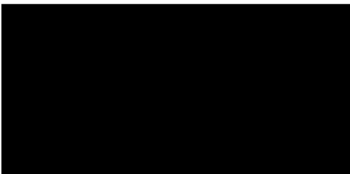
5. Conclusion

- 5.1. It is positive to see that some of the additional evidence and rationale provided to the ORR in our last consultation response on 11th November 2024 has been acknowledged and taken into account, resulting in this revised position on O&M efficiency stretch from [.] to [.] over CP4. However, as we outlined in our previous consultation response, this level of additional efficiency is not achievable within the next control period, [.] . Additionally, [.] have a long-term detrimental effect on the HS1 system and charges to operators. To be clear, we will not be able to deliver our 5YAMS efficiencies and commitments, if we have reduced investment funding compounded by additional efficiencies from the ORR. The [.] is not achievable and imports significant risk to NR (HS) and the wider HS1 system.
- 5.2. NR (HS) rejects the ORR's proposed [.] of additional O&M efficiencies over CP4, which again in this consultation has not been underpinned by credible assumptions nor evidence. Pushing for a significant efficiency stretch with only one page of limited detail, is extremely troubling, despite the additional detail and evidence provided by NR (HS). We understand that the Final Determination will apply to HS1 Ltd as the regulated entity. However, as the ORR is

identifying potential efficiencies in NR (HS)'s [..], we will be left with no choice but to consider the basis for reviewing judicially the ORR's exclusion of enablers from our [..], should the position remain unchanged in the ORR's Final Determination.

- 5.3. [..].
- 5.4. We urge the ORR to review our previous consultation response, together with the points set out in this letter and the appended supporting document from [..], and reconsider its decisions.
- 5.5. Please do not hesitate to contact me if you wish to discuss any aspects of this letter, ahead of the Final Determination.

Yours sincerely,



George Mackintosh
Managing Director
Network Rail (High Speed) Ltd

Copied to:
Chantelle Casula – Network Rail (High Speed) Ltd

1. [..]