



Network Rail Infrastructure Limited
Waterloo General Office
London
SE1 8SW

28 June 2024

Emyl Lewicki
Track Access Manager
Office of Rail and Road

Via email

Dear Emyl,

NETWORK RAIL REPRESENTATIONS FOR THE PROPOSED TRACK ACCESS AGREEMENT BETWEEN NETWORK RAIL INFRASTRUCTURE LIMITED AND CALEDONIAN SLEEPER LIMITED DATED DECEMBER 2024

As directed in your letter dated 30 May 2024, Network Rail (NR) is making its representations in respect of a Section 17 for a proposed track access contract between Network Rail Infrastructure Limited (we/NR) and Caledonian Sleeper Limited (CSL).

In line with ORR's letter of 24 April 2024 to the industry on 'Competing and/or complex track access applications for December 2024, May 2025 and December 2025 timetable changes', CSL submitted this application to the ORR on the 20 May as a Section 17.

As part of this application, CSL seek to amend their current calling pattern for their London to Inverness service (Service 558), from SCD 2025. The amendment seeks to introduce Birmingham International as a regular call. This Section 17 application also includes the rollover of existing services as part of the Track Access Contract (TAC) Extension component.

We would note that NR discussed the format of the Section 17 application with the ORR prior to CSL's submission on 20 May 2024. This was due to the associated application already in Industry Consultation and being applied for under Section 22 (7th Supplemental Agreement), which applied for the following from PCD 2024:

- (A) Track Access Extension (TAC) PCD 2024 – PCD 2030 – using existing rights in Table 2.1 and Table 2.2
- (B) The reinstatement of firm platform occupation time rights for Southbound arrivals at Euston in Table 9.1 of Schedule 5

CS submitted the Section 17 on the 20 May and at the point the 7th SA was in its third week of industry consultation. It was informally submitted to the ORR on 3 June 2024.

At the time of writing these representations, the 7th Supplemental Agreement was in the process of being signed by both parties, following a request for formal submission by ORR on 17 June 2024.

For the avoidance of doubt the 7th SA did not include CSL's aspirations to amend their current

calling pattern for their London to Inverness service (Service 558), from SCD 2025. Therefore, it must be noted that this representation letter is focusing on referring to and responding to only the amended calling pattern for London to Inverness services, as previously stated the TAC expiry element and Euston platform rights are included in the 7th SA which ORR have now invited both parties to formally submit.

Background

Your letter made clear to industry that “We expect applications received by 20 May 2024 to be of sufficient quality, completeness, and certainty to enable Network Rail, industry and ORR to assess them. A prerequisite for achieving this is that applicants will have discussed their plans with, and sourced information from NR before submission (in line with our guidance).”

It further “...requested that Network Rail produces a high-level plan by 05 June 2024 for ORR and industry. This will set out when it will produce its robust assessment for the applications submitted by 20 May 2024.”

NR fulfilled this request on the 5 June 2024 outlining the plan for undertaking capacity and performance assessments to inform both NR and the ORR on the applications received.

That response should be considered alongside this representation.

In particular, it should be noted as indicated therein that:

- due to the unprecedented scale of 83 unsupported applications received at one point in time, Capacity Planning plan to phase its analysis,
- assessments will initially focus on applications and geography which do not overlap with the ongoing ECML ESG development work to mitigate the risk of redundant analysis,
- all ECML ESG related applications will be considered following decisions as to the implementation of the ESG timetable,

As we set out in the high-level plan; “Only those rights which potentially interact, contain the required level of information to inform assessments, were discussed with Network Rail and are intended for the next three timetable changes will be considered by Network Rail.” and that “Applications consisting of rights for geography not impacted or for later timetable changes should be considered separately.”

These factors have shaped the anticipated plan for submission of evidence related to this and other applications.

Whilst NR was made aware by CSL that they would be applying for the proposed access rights as requested in ORR’s letter, NR has not yet had an opportunity to fully consider its position on this application and whether it can eventually support the proposed access rights.

ORR, in its invitation to NR to make written representations, expects that NR will:

- include all the necessary information for ORR to take an informed decision; or
- to refer to all the necessary analysis and the confirmed timelines NR requires to reach its decision on the application. This should include the “5 June 2024 capacity analysis” and any other analysis NR needs to complete;
- recognise which other applications within the published list of “20 May 2024 applications”

could interact with each application.

- Confirm any interested persons name(s) or confirm there are no interested persons.

In these representations, NR will not be able to provide all the necessary information for ORR to make an informed decision at this point in time. However, in this representation we will address each of the points above as well as provide:

- an initial view of the application Form P and Track Access Contract
- where applicable, highlight if NR believes that some of the access rights sought are outside the scope of the ORR's letter dated 24 April 2024;
- an indication of how NR will be able to provide its final representations and any intermediate representations so that ORR will then have all relevant information from NR to assist ORR in making an informed decision.

Interested Person(s)

NR is not aware of any persons who would fall within the definition of "Interested Person" in paragraph 1 of Schedule 4 of the Railways Act 1993 in relation to the application made by CSL.

Keeping you informed

As stated in the letter to the ORR on the 5 June "The plan will need to be flexible and reviewed through the process to consider industry decisions in relation to the ECML ESG along with potentially other changing industry priorities and requirements. For example, recommendations from the East Coast Task Force may impact on industry resources, in particular timetabling resource. This could require changes to the remaining stages of the plan, including impacting when analysis can be completed."

Please note although this application does not directly interact on the ECML, any decisions relating to the ECML could have consequential impacts on capacity and performance in relation to this application. This is particularly relevant for locations used by services which cross NR Route boundaries.

In the letter we also stated "We propose establishing a change control mechanism to track changes in the plan, when and where required, to retain transparency and clarity. This may also lead to consequential changes to anticipated dates of any resulting representations planned by our customer teams." Where such changes in timeline occur, we will notify you of any impacts on expected content, volume or timing of forthcoming information.

Summary of Rights Sought

NR welcomes the opportunity to enhance guest experience and connectivity on the network. As such, initial discussions around the possibility of amending Table 4.1 of Schedule 5 CSL's TAC to reflect aspirations to call at Birmingham International have been ongoing. Such discussions have involved input from CSL Operations team, and NR teams from Freight and National Passenger Operators (Freight and Customer) and North-West and Central (NW&C) region.

In their application and as a high-level summary CSL are seeking the following access rights to commence from SCD 2025:

- Rights required to run their ‘Highlander’ services via Birmingham International from SCD 2025 to TAC Expiry (PCD 2030 – as per the 7th SA),
 - amending the routing ‘via’ in Table 2.1 to include Birmingham International – routing via Coventry and the Wolverhampton avoiders rather than the Trent Valley lines.
 - adding Birmingham International as a calling point into Table 4.1

The High-Level Plan and Dependencies

The high-level plan submitted on 5 June, and our additional engagement with Capacity Planning indicates that the following phases may be relevant for this application -

- Phase 1 - Collation and Scoping Phase 2 - Risk Identification for application Phase 3 - Production Development Period for SCD 2025 aspirations Phase 4a – ECML confirmation for December 2025 Phase 4b – ECML confirmation for May 2025 Phase 5 – December 2025 Production Period

Alongside these phased outputs, the National Passenger Operator team, NW&C and Capacity Planning will also look to consider power, safety, and capacity dependencies.

We are mindful that the high-level plan and its analysis, or other issues indicated, may identify dependencies, risks or changes in risk profiles that could require revision or further review of individual responses. We also note the 5th June plan does not guarantee that analysis will not have to continue beyond the timetable development process. Where this is the case we will communicate with the Operator and ORR.

As stated later in this letter, if interactions occur at different points in time, i.e. different timetable change dates, then this could have an impact on when NR will be able to submit its position with regards to the application.

Industry Consultation for this application commenced on 22 May 2024 and concluded on 22 June 2024.

Common route / regional identified considerations / constraints

This request for rights covers a point in the network where it has been identified at a regional level that more than one application should be considered by ORR at the same time, as any one decision would restrict the ability to accommodate other requests due to capacity limitations and power concerns.

A high-level summary of the other affected operators’ applications has been highlighted in Annex B.

NR Review of Form P and associated documents

NR has performed an initial assessment of the Form P and associated documents submitted with this application.

NR would like to highlight the following:

Section 3 – Application Overview

- The Form P submitted by CSL was in reference to a S.17 application. The application

requested the following –

- (a) Track Access Extension PCD 2024 – PCD 2030 – using existing rights in Table 2.1 and Table 2.2
- (b) The reinstatement of firm platform occupation time rights for Southbound arrivals at Euston in Table 9.1 of Schedule 5 to PCD 2026
- (c) Rights required to run services to Birmingham International from SCD 2025 to TAC Expiry (PCD 203) – the addition of Birmingham International as a calling point in Table 4.1

As previously highlighted in these representations, aspects (a) and (b) of this application have now been supported via a Supplemental Agreement (7th SA) and will shortly be submitted formally to the ORR. These representations hence only consider the additional component (c).

- NR would highlight that where this application was submitted as a Section 17, it should have been referenced by CSL as a ‘New TAC’ rather than the ‘9th Supplemental Agreement’.
- CSL have flagged that the safety risks associated with the amendment to calling pattern (adding Birmingham International and going via the Wolverhampton avoiders rather than the Trent Valley lines) have not yet been considered due to the timing of the application. The standard T-CRAG and TP-HAZID risk assessment process will be expected to be undertaken prior to NR’s potential support of this application.

Section 4 – The impacts of the proposal

- In Section 4.1, Benefits, CSL have indicated that the proposed timetable enhancement aligned to this application is ‘aligned with (CSLs) Grant Agreement obligations to Transport for Scotland and Scottish Rail Holdings’. Given the proposed amendments to the arrival times at Euston Station associated with this proposal, NR would like confirmation that Scottish Rail Holdings are supportive of this change.
- In Section 4.3, Performance, CSL have indicated the current performance levels of their services, a factor which NR commends and is keen to retain. NR would therefore be keen to understand the methodology behind the aspired timings submitted for the calling points, and how this aligns with the desired Right Time arrivals in London Euston.
- NR would also flag that the monitoring of Right Time arrivals involves the measurement of part cancellations (and hence Fail to Stop), as per the industry definition of Right Time. As a service which largely has pre-booked guests, NR would be keen to understand:
 - (a) If CSL will always stop at Birmingham International, regardless of whether there are guests pre-booked onto the service;
 - (b) If CSL are not looking to stop at Birmingham International if no guests are booked, the anticipated implication of this on Right Time performance measurements.
- Section 4.4 highlights that none of the platforms at Birmingham International are long enough to fully accommodate the Sleeper service, and that a risk assessment process will hence have to be undertaken to produce and review a Method of Working Statement. As above, this must be considered in the standard NR risk assessment process.

- Section 4.4 also refers to power requirements. NR direct the ORR to paragraph 3 of ‘Network Rail’s Initial Position on the Access Rights Sought prior to necessary assessments being completed in line with the plan’ for an initial NR view on the potential power concerns in relation to this application.

Section 5 – The expression of access rights

- NR note that whilst an overview of the changes to Table 2.1 of Schedule 5 has been provided in Section 5.1, CSL have not included the changes required to Table 4.1 in this section. NR do however note these changes in the proposed Table 4.1 provided alongside the application.

Section 8 – Enhancement

- As above, NR direct the ORR to paragraph 3 of ‘Network Rail’s Initial Position on the Access Rights Sought prior to necessary assessments being completed in line with the plan’ for an initial NR view on the potential power concerns in relation to this application.

NR’s Initial Position on the Access Rights Sought prior to necessary assessments being completed in line with the plan

NR has made every attempt in their initial assessment of the application received to be able to inform the ORR of any early positions it might have on the access rights sought. Whilst, as outlined in this letter, NR has a number of assessments and analysis that needs to be undertaken to inform a position whether NR supports or not the application that has been submitted by CSL (detailed later in the letter), we do have an initial view on some aspects of the of the access rights sought by CSL Ltd.

Track Access Contract (TAC) Extension

A TAC Extension from PCD 2024 – PCD 2030 has been supported by NR via a Section 22. Following invitation to submit formally to ORR on 17 June 2024, this will be submitted as the ‘7th Supplemental Agreement’.

The reinstatement of firm platform occupation time rights for Southbound arrivals at Euston in Table 9.1 of Schedule 5

The reinstatement of firm platform occupation times for Southbound arrivals at Euston was being sought by CSL up to PCD 2026. A footnote has been added in Table 9.1 via the 7th Supplemental Agreement to denote the dated access. As stated above following invitation to submit formally to ORR on 17 June 2024, this will be submitted as the ‘7th Supplemental Agreement’.

Birmingham International Aspirations

(1) Possible Interactions with Other Applications from 20 May 2024

As requested in ORR’s invitation for NR to make written representations to this application, Annex B to this letter shows where this application could interact with each of the “20 May 2024 Applications” at the previously identified locations.

Please note if the interactions occur at different points in time, i.e. different timetable change dates, then this will have an impact on the dates that NR will be able to submit its position with regards to the application. I.e. if the application submitted for Operator A is to commence SCD 2024 and there are no concerns or conflicts that does not mean that when Operator B’s

aspirations are considered which start in PCD 2025 that both will be able to be accommodated and therefore NR will have to see the outputs of the capacity assessments for the SCD 2025 timetable for Operator B before they can give a final position on Operator A's application.

(2) North West and Central Region Position

Summary

North West and Central (NW&C) Region has several large enhancement projects taking place including TransPennine Route Upgrade, HS2 and Midlands Rail Hub impacting long term capacity utilisation for which we will give consideration to when reviewing this application once all the necessary assessments have been completed and Network Rail is able to collectively assess the risks and impact this application may have.

In addition to the key interacting locations specified in ORR's letter of 24 April 2024, Network Rail is also aware of other locations for which there are potentially interacting aspirations and capacity constraints. This includes but is not limited to Manchester and the surrounding area, Crewe, and the Wolverhampton corridor. During our assessment of the applications we will be paying particular attention to both the locations identified in ORR's letter and those named above.

As ORR is aware Birmingham and surrounding area is one of the key interacting locations highlighted in ORR's letter of 24th April 2024. This application is one of a number of applications seeking additional rights in Birmingham and surrounding areas. It is our intention to develop a strategic plan for passenger services in the West Midlands area in order to optimise capacity in the medium and long term, taking cognisance of the Midlands Rail Hub project in order to realise the investment benefits of this project. We will do this in consultation with all affected operators and stakeholders.

Due to the time required to undertake an industry review and strategic plan and the assessment plan for this application not aligning, whilst considerations and any views will be highlighted when we provided our outputs of the plan, timescales do not allow the opportunity to provide a long term strategic capacity utilisation assessment.

In preparation of the December 2022 timetable, Network Rail formed industry workstreams to undertake a strategic review of capacity utilisation on both the West Coast Mainline South and Manchester area including the Castlefield corridor and Manchester Victoria. A separate industry working group (managed under the governance of the Grand Rail Collaboration) assessed options for the service structure on the Wolverhampton – Coventry route through Birmingham New Street. The timetable today still reflects this structure, and the outputs produced for December 2022, which were supported by the industry, remains the strategic

Power

A key consideration included in the plan within Annex C is regarding power supply on NW&C. As previously informed, NW&C has several areas of concern with regards to power supply. For any application utilising electric traction, it is our intention to model the outputs of the capacity assessment to understand the power supply risk both during normal working and in N-1 conditions. In carrying out traction power modelling, NW&C region adheres to the requirements stipulated in NR/L1/ELP/27000 "Policy Requirements for Electrical Power Assets". This policy states that the electrical power supply system shall have sufficient redundancy to support the peak timetable with one key piece of equipment out of service (known as N-1). In addition to fulfilling Network Rail policy requirements, maintaining the required N-1 redundancy levels in the traction power network supports adherence to contractual, performance and safety targets.

In order to accurately assess power supply it is key that we understand any Empty Coaching Stock

moves. We will be requesting this information separately from operators if it was not previously supplied as part of the 20 May applications.

We will undertake internal consultation of the application following our usual business practices however as a result of ORR letter of 24 April 2024 NW&C has 55 application which it must consider. Therefore our internal consultation will be over a longer period of time, and this has been allowed for in the plan.

Power supply and route performance assessments require additional subject matter support from third party organisations and therefore whilst we have included anticipated timescales within the plan these are currently subject to confirmation.

Allowing business continuity while preserving freedom of action for ORR in taking its decision

Our letter of 5th June stated that in this interim period Network Rail will have to balance the need for business continuity, so that current services may continue to operate and timetable changes can be made when there is low risk of negative outcomes for passengers and freight users, with the need to avoid prejudicial decisions that could unduly favour one party where aspirations interact.

We note that some operators have split their applications across different timetable periods, which already provides ORR with the ability to deal specifically with the nearer-term applications now, whereas others have combined different timetable periods in a single application.

Should ORR wish to make a single decision on each application it has received, without breaking that application into parts, then, where a single application has been made relating to multiple timetable periods, there is a risk that rights might not be available in time for an operator to commence services as early as it would like, given the need for all of the information set out in our plans to be available in order for decisions to be made relating to those future timetables.

Where paths associated with some of the quantum rights in this application are included in a New Working Timetable issued under the Network Code Part D process, then Network Rail proposes to work with the applicant on these elements of the application. Our aim, subject to normal governance processes, would be to potentially agree a new s22 application for contingent, time-limited rights for that timetable period with no presumption of continuity – in line with the approach that ORR has supported for applications on the East Coast Main Line in recent years.

This would enable you to reserve your position on future capacity choices, allowing decisions that relate to a later timetable period to be made simultaneously, while making effective use of the railway network in the earlier timetable periods.

Conclusion

NR is aware that this representation letter does not contain all the information needed for this application for the ORR to make a decision. NR customer team will continue to have regular discussions with CSL as to the status of the outlined dependencies whilst assessments are ongoing.

NR acknowledge that the operation of CSL is unique in both the guest experience provided and the complexity of the operation itself. In recent discussions, CSL have reiterated that to maximise guest experience, tickets are sold up to a year in advance and therefore any delays in decisions on access rights and timetable amendments has a subsequent impact on the capacity to sell tickets for associated services. We acknowledge and understand CSLs queries in relation to this, and we will endeavor to continue strong communication between ourselves, CSL and the ORR around this

application, and in the meantime, we thank CSL for their continued collaboration and constructive discussions during this period.

As explained in our letter of 5 June 2024, these representations letters were mostly expected to reserve our position pending the outcome of the capacity and performance assessments. We are also mindful that the plan and its analysis may identify dependencies, risks or changes in risk profiles that could require revision or further review of this response. However, we hope that the plans we provided give you the reassurance that we will assess this application to inform NR's position in a later representation in line with the plan and letter. In addition, NR wants to give the ORR the confidence that we have made every effort in this letter to give any initial views where we can.

NR asks that while we carry out our assessments, ORR progresses with its own assessments wherever possible to assist in making early decisions/ descoping the scale of applications requiring assessment from NR.

Please do not hesitate to contact me if there is any further information you may require at this stage.

Your sincerely

Sophie Grieves
Customer Manager Network Rail



Annex A – Plan for Information / Analysis / Assessment

Details of Information / Analysis / Assessment	NOTES	
High Level Phases from 5th June Plan		
Phase 1 Collation & Scoping	Please see the June 5 Letter for details.	
Phase 2 Risk Identification for May 2025	Please see the June 5 Letter for details.	
Phase 3 May 2025 Production Development Period	Please see the June 5 Letter for details.	
Phase 4a - (ECML confirmed for December 2025) – focusing on December 2025	Please see the June 5 Letter for details.	
Phase 4b - (ECML confirmed for May 2025) – focusing on December 2025	Please see the June 5 Letter for details.	
Phase 5 – December 2025 Production Period	Please see the June 5 Letter for details.	
Further Route / Function Analysis / Assessments / Information		
NW&C Power Assessments for May 2025 TT		
NW&C Power Assessments for December 2025 TT		
NW&C Risk Assessments for May 2025 TT		
NW&C Risk Assessments for December 2025 TT		
SoAR Internal Consultation of latest NR position	Should allow for 3-week SLA	
SoAR Panel		

Annex B – High level summary of other applications in identified locations.

Birmingham Area Interactions

Operator/Application/Type	Intended Timetable Change Date				A	B	C	D	E	F	G	H	I
		Dec-24	May-25	Dec-25	WCML south	Birmingham	BHM-Derby	Derby-Sheffield	Sheffield	ECML&Leeds	Oxford	Gloucester	Cardiff
DBC 81st SA 22a	ASAP	x	x	x		x	x	x	x	x	x	x	x
DBC 87th SA 22a	ASAP	x	x	x		x	x	x	x	x		x	x
DBC 70th SA 22	ASAP	x	x	x		x	x	x	x	x	x		
DCR 2nd SA 22a	ASAP	x	x	x	x	x		x			x		
GBRf 34th SA 22a	ASAP	x	x	x	x	x	x	x		x	x	x	
GBRf 25th SA 22a	ASAP	x	x	x	x	x	x		x	x	x		
Varamis 2nd SA 22a	ASAP	x	x	x	x	x				x			
WMT 32nd (29th) SA 22A	ASAP	x	x	x	x	x							
CrossCountry UC, Hydra, Stansted 17	Dec-24; May-25	x	x	x		x	x		x	x	x	x	x
FLIM 25th SA 22A	Dec-24; May-25	x	x	x	x	x	x		x	x	x		
DRS 17th SA 22A	Dec-24; May-25; Dec-25	x	x	x	x	x	x		x	x		x	x
Avanti 11th SA 22A	Dec-24	x			x	x							
Avanti 14th SA 22A	Dec-24	x	x	x	x	x							
FLHH 24th SA 22A	Dec-24	x	x	x		x					x	x	
FLHH 25th SA 22A	Dec-24	x	x	x	x	x	x		x	x	x	x	
FLHH 27th SA 22A	Dec-24	x	x	x		x	x		x	x	x		x
FLHH 28th SA 22A	Dec-24	x	x	x	x	x	x		x	x	x	x	x
FLIM 21st SA 22A	Dec-24	x	x	x		x	x		x		x		
FLIM 23rd SA 22A	Dec-24	x	x	x	x	x							
FLIM 24th SA 22A	Dec-24	x	x	x	x	x	x			x			
WMT 22nd SA 22A	Dec-24	x	x	x		x							
WMT 28th SA 22A	Dec-24	x	x	x		x							
Avanti 3rd SA 22a	May-25		x	x	x	x							
Avanti 17th SA 22a	May-25		x	x	x	x							
Caledonian Sleeper 9th SA 17	May-25		x	x	x	x							
WMT 30th SA 22A	May-25		x	x		x							
WMT 31st SA 22A	May-25		x	x		x							
WSMR New Contract 17	May-25		x	x	x	x							
Alliance Rail Cardiff - Edinburgh 17	Dec-25			x		x	x	x	x	x		x	x
Virgin New Contract 17	Dec-25			x	x	x							

Annex C – NW&C Assessment Plan

TASK	ASSIGNED TO	
Capacity Assessment		
High Level Plan provided 05 June 2024		
Collating & Scoping	System Operator - CP	Please see June 5 letter for details
Phase 2 Timetable Risk Identification May'25	System Operator - CP	Please see June 5 letter for details
Phase 3 May'2025 Production Development Period	System Operator - CP	Please see June 5 letter for details
Phase 4a ECML confirmed Dec'25 Dec'25 assessment against May'25	System Operator - CP	Please see June 5 letter for details
Phase 4b Dec'25 assessment ECML confirmed May;25	System Operator - CP	Please see June 5 letter for details
Phase 5 december 2025 Production period	System Operator- CP	Please see June 5 letter for details
Other Capacity assessment		
2022 Strategic plan capacity assesment	Regional Timetable Team	
Risk Identification		
May'25 TP-Hazid passenger applications	Regional Timetable Team	
TP-Hazid Upto and including May'25 freight applications	Regional Timetable Team	
May'25 TP RAM - all applications	Regional Timetable Team	
Dec'25 TP Hazid - all applications	Regional Timetable Team	
Dec'25 TP -RAM - all applications	Regional Timetable Team	
Internal consultation of applications	F&A Team	
Planned Assessments		
Ped flow assessment of Euston Station	Station Capacity Team	
Level Crossing assessment		
Mapping of number of services to each ELR	Regional Timetable/F&A team	
ALCRM modelling/assessment	LCM	
ALCRM modelling/assessment - May'25	LCM	
ALCRM modelling/assessment - Dec'25	LCM	
Power Supply Modelling		
Phase 1: Build baseline model		
Phase 2: Navitas provide modelling for baseline model	Asset Management	
Phase 3: Assess baseline + Proposed services	Asset Management	
Phase 4: May'25 Production Development Timetable	Asset Management	
Phase 5:N-1 assessment	Asset Management	
Phase 6: Impact assessment + mitigation assessment	Asset Management	
Phase 6: Re-create modelling CIF file based on Dec'24 actuals	Asset Management	
Phase 7: Dec'25 Production Development Timetable	Asset Management	
Phase 8:N-1 assessment	Asset Management	
Phase 9: Impact assessment + mitigation assessment	Asset Management	
Performance Analysis		
Phase 1: Internal review of existing data	Route performance teams	
Phase 2: Performance assessment of May'25 decisions	Route performance teams	
Phase 3: Performance assessment of Dec'25 decisions	Route performance teams	
Governance		
Potential representations for Dec'24		
Draft Letter	F&A team	
Internal Review	F&A Team	
SOAR review and approval	F&A Team	
Submit to ORR	F&A Team	
Final representations:		
Draft letter	F&A team	
Internal Review	F&A team	
Internal Consultation	F&A team	
SOAR review and approval	F&A team	
Submit to ORR	F&A team	