

# Price Control for Northern Ireland's Gas Distribution Networks GD14

Consultation on Our Overall Approach

03 December 2012

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## Acronyms and Glossary

Capex	Capital expenditure
CAPM	Capital Asset Pricing model - A model that describes the relationship between risk and expected return
European Gas Directive	Directive 2009/73/EC of the European Parliament of 13 July 2009 concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC
GD14	This is the name given to the next price control for PNGL and firmus. It is proposed to cover the period 2014 – 2018 (calendar years)
GDN	Gas distribution network companies - firmus and PNGL
I&C	Industrial and commercial
firmus	firmus energy (Distribution) Ltd
OFGEM	Regulates the electricity and gas markets in Great Britain
Opex	Operating expenditure
PC02	This is the name given to the price control for firmus, which runs from 2009 to 2013 (calendar years)
PC03	This is the name given to the price control for PNGL, which runs from 2007 to 2011 (calendar years)
PNGL	Phoenix Natural Gas Limited
PNGL12	This is the name given to the price control for PNGL, covering calendar years 2012 and 2013
PC	Price Control
RPI	Retail Price Index
RIIO-GD1	This is the first gas distribution price control, by OFGEM under the new RIIO (Revenue = Incentives + Innovation + Outputs) model. The price control will be set for an eight-year period from 1 April 2013 to 31 March 2021
TMA	Traffic Management Act. This was brought in to tackle congestion and disruption on the road network. The TMA places a duty on local traffic authorities to ensure the expeditious movement of traffic on their road network and those networks of surrounding authorities. This has yet to come into force in Northern Ireland, at time of writing
UR	Northern Ireland Authority for Utility Regulation

# 1 Introduction

## Purpose of Document

- 1.1 The purpose of this document is to consult on the high level approach which we propose to take in relation to the next price control for the two gas distribution networks in Northern Ireland, firmus energy (Distribution) Ltd (“firmus”) and Phoenix Natural Gas Ltd (“PNGL”).
- 1.2 This document sets out our proposed approach to GD14 as follows:
- Section 1 outlines our role in line with our statutory duties;
  - Section 2 provides context, covering the economic regulation of Gas Distribution Networks and Price Controls;
  - Section 3 provides an overview of the previous price controls for GDNs and sets out the case for GD14;
  - Section 4 sets out our proposed approach to some key areas which must be addressed as we develop and deliver GD14, including the areas for main consideration. It also discusses proposals on other future areas for consideration;
  - Section 5 discusses the consumer impact and how we will engage with stakeholders throughout the price control process;
  - Section 6 considers the timetable and key milestones for GD14;
  - Section 7 sets out the consultation process;
  - The maps of the licensed areas are shown in the appendices to this document.

## Background

- 1.3 Our principal objective in carrying out our gas functions is to promote the development and maintenance of an efficient, economic and co-ordinated gas industry in Northern Ireland, and to do so consistently with our fulfilment of the objectives set out in the European Gas Directive<sup>1</sup>, and by having regard to a number of matters, as set out more fully in the Energy (Northern Ireland) Order 2003.
- 1.4 In summary, taken in the round, we interpret our duties, in the context of carrying out price controls, as a broad mandate to secure the most cost efficient outcome – for the protection of consumers and the promotion of the gas industry in Northern Ireland – that also secures that the company can continue to finance the activities which are the subject of obligations placed on it, and that has due regard to all relevant factors.

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<sup>1</sup> Directive 2009/73/EC of the European Parliament and the Council of 13 July concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC

- 1.5 We are a non-ministerial government department, accountable to the NI Assembly.
- 1.6 We set overall limits on how network prices can rise, or are required to fall, through a process called price controls.
- 1.7 The price control process must therefore start with the business plans (including actual data for previous years), as submitted by license holders, setting out their proposals for costs going forward. The information submitted will be scrutinised by the UR. In doing so, we seek to ensure that Gas distribution license holders deliver best value for money for all consumers.
- 1.8 In making decisions during the GD14 price control, the UR will ensure the revenues and resulting tariffs are:
- Sustainable;
  - Stable;
  - Transparent;
  - Predictable; and
  - Cost-reflective.
- 1.9 This approach is based on best practice regulation of natural monopolies. Our task essentially consists of creating a framework within which, in return for providing monopoly services to an acceptable quality, the company receives a reasonable assurance of a revenue stream in future years that will cover its costs and ensure fairness for the consumer.
- 1.10 Northern Ireland has two Gas Distribution Networks.
- 1.11 Phoenix Natural Gas Limited (PNGL) own and operate the distribution network in the Greater Belfast and Larne areas. A map outlining the PNGL distribution licence area is shown in Appendix 1.
- 1.12 firmus energy (Distribution) Limited (firmus) own and operate the distribution network, normally called the ten towns. The ten towns licence area covers a greater geographical area including Londonderry, Limavady, Coleraine (inc. Portstewart, and Bushmills), Ballymoney, Ballymena (Broughshane), Antrim (inc. Ballyclare and Templepatrick), Craigavon (inc. Portadown and Lurgan), Banbridge, Newry (Warrenpoint) and Armagh (Tandragee). A map of the ten towns licence area is shown in Appendix 2.
- 1.13 PNGL was awarded their conveyance licence in September 1996. Presently they have over 150,000 customers connected within the Greater Belfast and Larne licence area.
- 1.14 firmus was awarded their conveyance licence in March 2005 and have around 15,000 customers connected within the ten towns licence area.

## 2 Context

### Economic regulation of Gas Distribution Networks

- 2.1 Where a monopoly exists, consumers are not able to change their network operator in order to receive better prices or service levels. In the absence of such competitive pressures, natural monopolies may act against consumer interests by:
- Becoming or remaining inefficient, passing higher costs on to consumers than would otherwise be necessary;
  - Accepting poor levels of service rather than seeking innovative or challenging ways to improve performance while reducing costs.
- 2.2 By subjecting monopoly service providers to external benchmarking and challenge, independent economic regulation helps ensure that they continue to act in the consumer interest.
- 2.3 Economic regulators also impose budgetary constraints on the regulated company or companies (while at the same time making sure that they are adequately financed). These constraints are based on direct challenge of the company's proposals, supported by external benchmarking of cost and service to establish the company's relative efficiency and performance.
- 2.4 The provision of gas distribution services tends to be a natural monopoly, and in NI, is delivered by firmus and PNGL, over a defined geographic area.
- 2.5 As firmus and PNGL, in their respective geographical areas, are the only monopoly gas distribution service provider, a regulatory framework has been put in place to protect the consumers who use its services. In our role as economic regulator, we take action if we consider that the company is performing less well or operates less efficiently than its peers and we set targets for improvement.
- 2.6 To ensure that a strong regulatory framework is in place between us and firmus and PNGL, we also establish a clearly defined set of outcomes that the GDN's must deliver. When selecting these outcomes we aim to strike a balance between outcomes that are clearly defined while allowing the GDN's the flexibility it needs to deliver them in the most effective way.

### Overview of the price control process

- 2.7 Within a regulatory regime, the determination of a constrained budget to deliver a defined set of outcomes over a set period is achieved through the price control process.

- 2.8 The principal aims of the price control are to ensure that:
- Prices are set at the lowest level that is consistent with delivering outputs;
  - GDN's day-to-day running costs are kept as low as possible; and
  - GDN's invest efficiently and effectively and so deliver the desired effect of the development of the Gas Industry, at value for money prices.
- 2.9 We also challenge the company to improve its efficiency and performance relative to the Gas Distribution companies in Great Britain.
- 2.10 The wide-ranging price control process includes a number of distinct stages:
- GDN's prepare a business plan (including actual data for previous years), that sets out its assessment of the funding necessary to deliver these outcomes;
  - We consider the business plan and benchmark efficiency and performance in order to set appropriate allowances that we consider are necessary to allow the GDN to operate in an efficient manner;
  - We issue a Draft Proposal for Public Consultation. We encourage stakeholders to provide their views by commenting on the draft proposals;
  - We then assess the business plan and carefully consider all responses received from the Draft Proposal Consultation to arrive at a Final Determination of a challenging and achievable level of funding. This process ensures the Final Determination is fair, balanced and proportionate for the GDNs.

### 3 Overview of our price controls

#### Existing Price Controls: PNGL12 (2012-13) & firmus PC02 (2009-13)

- 3.1 In late 2009 we began scoping and planning the work necessary to develop the PNGL12 price control. In considering the issues involved, we also considered the merits of aligning the timing of the price controls of the two GDNs in Northern Ireland and how we might go about this.
- 3.2 The merits of aligning the price controls and the potential options to achieve this were consulted on in January 2010<sup>2</sup>. A decision then followed to align the price controls by way of imposing a two year price control on PNGL for 2012 and 2013, thereby achieving alignment in 2014 of both firmus and PNGL
- 3.3 This will follow the price control that is due to be set by OFGEM on Gas Distribution Networks in late 2012, called RIIO-GD1, which will have valuable benchmark data.
- 3.4 PNGL's current price control (referred to as "PC03") commenced in 2007 and ended in 2011. We presented a new determination to PNGL, called PNGL12, covering 2012-2013, which was rejected. This was referred to the Competition Commission in March 2012. The Competition Commission's Inquiry ended on the 30 November 2012, and a PC will be in effect for a 2 year control period ending in 2013.
- 3.5 firmus' current PC runs from 2009-2013 and is referred to as PC02, to refer to the 2<sup>nd</sup> price control in its history.
- 3.6 firmus and PNGL have certain similarities in the main component parts of the PC, such as Operating Expenditure (Opex), Capital Expenditure (Capex), Volumes of Gas and Rate of Return. This results in allowed revenues or conveyance charges, which are set over various customer categories (mainly Domestic and Large Industrial Commercial Customers) which the GDN charge to enable the recovery of operating costs, capital expenditure and allowed rate of return.
- 3.7 However there are also some differences between how the firmus and PNGL licences operate. The main difference is that PNGL operate under a revenue control, whereas firmus operate under a volume incentive control.

#### Gas Distribution Price Control 14 (GD14 2014-2018)

- 3.8 As the timing of the price controls for both Gas distribution companies are now aligned, this allows the opportunity for a co-ordinated approach to the firmus and PNGL PC.

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<sup>2</sup> *Aligning the Price Control Reviews of Northern Ireland's Gas Distribution Networks,* the Utility Regulator, January 2010 [http://www.uregni.gov.uk/uploads/publications/NI\\_GDNs\\_Price\\_Control\\_Alignment\\_v10\\_FINAL.pdf](http://www.uregni.gov.uk/uploads/publications/NI_GDNs_Price_Control_Alignment_v10_FINAL.pdf)



- 3.9 There is also a growing need for a more holistic, more strategic approach to the management of all aspects of the gas industry. This will facilitate a consistent approach to gas distribution across the whole of Northern Ireland and will ensure benchmarking between the companies is implemented to ensure downward pressure on costs.
- 3.10 The optimum duration of a price control is a matter of judgement that needs to balance, the advantage of allowing as much time as possible to plan and deliver the service and also take account of the external drivers and constraints that inform the overall level of charging that is possible. .
- 3.11 There is the option of delaying the full price control for a period of time and implementing a roll over. However we believe it is important to set out the capex and opex allowances for the GDNs for the next price control period and we are therefore minded to produce a full price control in 2013 which would cover the standard five year price control period. Therefore it is proposed that the GD14 price control would run from 2014-2018.

## **Aims for GD14**

- 3.12 Our aim is that the GD14 process will:
- Provide a strong foundation for the long term funding of gas, delivering long term improvement in the service to consumers;
  - Challenge the GDN's to improve their efficiency and performance at an achievable and sustainable rate; and
  - Promote long term planning of the Business Plan which will secure continuity of investment between years and between price control periods.

## 4 Our Approach to Key Areas

### Introduction

- 4.1 We propose that at the GDN price control we will set price limits for a five-year period. We will do so in a way that ensures that the company's operational and investment costs can be met and objectives delivered effectively and efficiently, providing best value for money to consumers.
- 4.2 All aspects of the GDN's businesses will be considered and the objectives to be delivered will be tailored to take account of the needs of the developing gas industry in Northern Ireland and cost. While we propose to focus on the five year period, we will also consider the planning work necessary to support the effective and efficient delivery of service in the longer term.
- 4.3 In section 6 of this paper we provide a timeline of the key milestones which will be followed throughout the price control process.

### A proportionate approach

- 4.4 In addressing these key areas, we are mindful of the need to keep the regulatory burden to a minimum while addressing the information asymmetry that exists between us and the companies.
- 4.5 We will propose to adopt and apply a number of principles to ensure that our approach is proportionate. These principles are:
- GDN submissions should be in line with cost reporting templates previously set out;
  - Any unique or exceptional costs will be identified separately in GDN submissions;
  - Areas of high expenditure will receive substantially more scrutiny and analysis, than low value items;
  - Benchmarking will be used to ensure that the allowances set are efficient;
  - Ensure where possible, that where allowances are set, they are closely aligned to clearly defined outputs;
  - Costs that are related to external factors that may not happen, will be ring fenced and removed at the time of the next PC. A retrospective mechanism will be utilised to deal with these issues;

- If insufficient information is available to make an informed determination, some areas may be subject to re openers;
- Use of a standard RPI-X framework, which will incentivise the GDN to control its costs;
- Rules on how unforeseen costs and retrospective adjustments will be clearly set out.

## Information requirements

4.6 We will continue to ensure that the information we require from the GDNs is proportionate but sufficient to:

- Allow the GDN to communicate its business plan to us in a clear and effective manner; and,
- Ensure that we can submit the plan to effective and focused scrutiny.

4.7 For GD14 we will:

- Continue to use and build on the information requirements that we developed for cost reporting, maintaining the key objectives of continuity and simplicity;
- Add additional information requirements where necessary, for example to support efficiency assessments and capture information on current issues;
- Discuss opportunities to seek further alignment between price control submissions and other processes;
- Consider whether further amendments are necessary to ensure clarity and reconciliation between the price control determination and Statutory/ Regulatory Accounts;
- Use appropriate methods to check and verify key information, as requested, especially pipes laid and connections;
- Use a price base that is submitted in today prices, with an assumed RPI index to enable ease of switching to other price bases if necessary; and,
- Require that all spreadsheets are driven by inputs and drivers. Hard coding of numbers should only be completed where it is not possible to provide drivers behind the numbers.

## Main areas for Consideration

4.8 The main areas that we propose to consider for GD14 are listed below. However, given the timeline for the Price Control and complexity of some areas to be considered, it may be necessary to make re-openers for some areas during the price control period. If this is necessary, this will be set out fully in the Final Determination.

4.9 In considering the areas listed below, we will carefully consider the impact on all consumers.

### 4.10 Opex

In relation to opex and volumes of gas, we propose:

- To review in detail the cost make up of the significant cost categories in opex and benchmark where appropriate;
- All other opex allowances will be reviewed at a summary level;
- To set allowances which are clearly identifiable to outputs.

### 4.11 Capex

In relation to capex, we propose:

- To review the tendered contracted rates of the construction company that is responsible for installing all gas services in relation to network activities;
- To review all Capex Unit Rates that are proposed in the business plan and benchmark against OFGEM GDN rates;
- To review the current approach on properties passed allowances;
- To keep to the principle that allowances granted must deliver certain outputs e.g. km Pipe laid, Meter and Service connections etc;
- To ensure that any future developments are taken into consideration if appropriate and realistic to have a significant impact to costs e.g. Traffic Management Act.

### 4.12 Efficiency Review

In relation to efficiency, we propose:

- That we will set a challenging efficiency target for the GDNs. In doing so, we will take account of the duration of GD14 and the scope this presents to plan for and achieve operational efficiencies within the certainty of a price control;
- To consider local regional variations for all allowances granted.

### 4.13 Volumes

In relation to volumes of gas and connections, we propose:

- To carry out analysis of the volumes of gas, by customer category;
- To review the target number of connections and associated volumes.

#### 4.14 Connection Incentives

- We propose to develop the existing Advertising, Marketing and PR Incentive Mechanism and consider its appropriateness for the future.

#### 4.15 Rate of Return

In relation to Rate of Return, we propose:

- To consider the rate of return for firmus and PNGL, based on a standard CAPM methodology;
- To use all available similar regulatory settlements to benchmark appropriate rates;
- To consider how tax should be treated in rate of return.

#### 4.16 Retrospective Adjustments and Models

- We are proposing to design and develop a Retrospective Mechanism, as part of the PC, to deal with the setting of allowances which are either based on outputs or pass through costs;
- It is intended that this Retrospective mechanism would be to deal with areas that have been clearly identified at the Price Control setting stage and to deal with areas that are to be adjusted based on outputs;
- It is our intention to publish the Financial Models, as presented by the license holders, to ensure a fair and equal level of transparency to all.

#### 4.17 Financeability

- We propose to consider the Financeability of the License holders, using established Financial Metrics.

#### 4.18 Designated Parameters

- Both licences have a number of 'designated parameters' which set out how various aspects of the price control formulae will operate and we will review these in line with our statutory duties.

#### 4.19 Post Commission Considerations (PNGL Only)

- We propose to consider the implications of the Competition Commission Final Decision of PNGL12 including how historic outperformance should be treated beyond 2013.

## Areas of Future Work

- 4.20 Given the timeline of the Price Control, it is likely that we will not have the time to fully address all issues. We thought it prudent to highlight areas that may be considered as either future re-openers or at the next PC.
- 4.21 These areas are as follows:
- Opex costs to be treated as per standard regulatory model and no longer capitalised;
  - Meter Reading, that is located in the Supply business, and consideration for moving to the distribution business; and
  - Review the Revenue Cap (PNGL) and the Volume Cap (firmus) to consider their appropriateness.
- 4.22 This list should not be considered exhaustive, but merely an indication of the main areas that could have been reviewed. The gas industry in Northern Ireland will be 20 years old in 2016 and we believe this should be an opportunity to review the regulatory framework to ensure it is consistent with the more mature industry that is now in place. This review would include licences and connection policies. However it is unlikely to take place in 2013.

## 5 Consumer Impact and Engagement

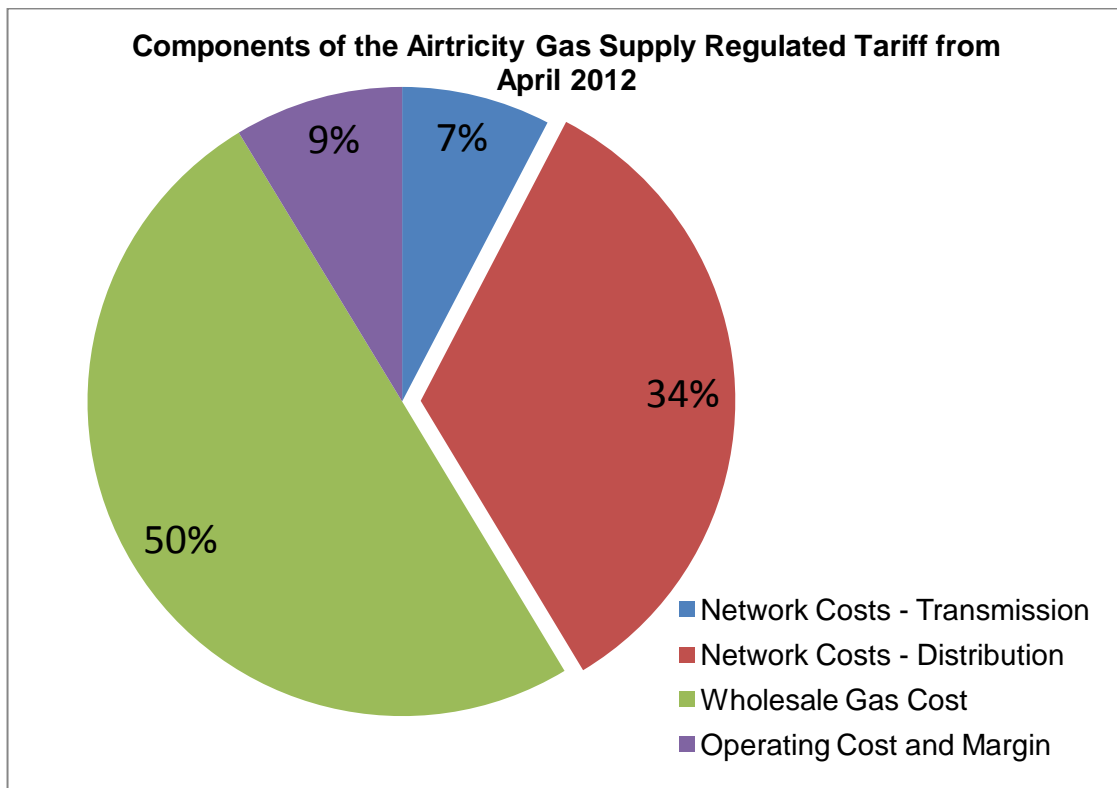
- 5.1 During the Consultation phase of GD14, key stakeholders will be engaged, to ensure full understanding on the key components of the PC. This will enable stakeholders to fully engage in the consultation process and allows us to take full account of stakeholder's views in making a final decision.

### Impact of Distribution Costs on Consumer Tariffs

- 5.2 The regulated tariffs for gas customers are comprised of the following main elements:

- Gas costs
- Operating costs of the supply business and supply margin
- Transmission system network costs
- Distribution system network costs

- 5.3 The following graph shows how each of these elements make up the Airtricity Gas Supply (NI) Ltd (previously Phoenix Supply Ltd) regulated tariff that has been effective since April 2012.



- 5.4 It is clear from this graph that, other than gas costs, the largest component of the Airtricity Gas Supply regulated gas tariff is the distribution network costs as they amount to over 30% of the regulated tariff paid by consumers. The firmus energy regulated tariff is also comprised of the same components with similar percentage splits between each element.
- 5.5 It is important to note that the wholesale gas market can be volatile and there is no real control over the wholesale gas cost. The largest element of the tariff that is regulated is therefore the distribution network costs.
- 5.6 It is clear that distribution network costs have a significant impact on the final gas bill for consumers and therefore it is vital to have active consumer involvement during the price control process.

## **Working with the Consumer Council**

- 5.7 The Consumer Council will have a key role to play in the price control in line with its statutory position. This will include engagement with the Consumer Council throughout the price control process for key strategic issues so that they have an opportunity to represent consumers throughout the decision making process.
- 5.8 We will engage with CCNI as to whether we have any common work streams that would add value to the price control, e.g. specific consumer research into consumer priorities.

## **Working with the other stakeholders**

- 5.9 We are committed to working with principal stakeholders in the Gas Industry to secure a successful outcome for GD14.
- 5.10 We propose to offer workshops to interested parties, to more fully engage on the issues that have been raised during the PC process and the consultation document. This will allow all stakeholders an opportunity to be as fully informed as possible.
- 5.11 This engagement will enable us to fully consider the wide spectrum of views, in preparation for the Final determination.
- 5.12 We will also take on board the views of credit agencies and investors through ongoing liaison work.



## 6 Timetable

- 6.1 The timing of this price control is extremely challenging. We had hoped that we would have received some detailed submissions in September. This would have allowed us to begin the process of reviewing the submissions, engaging with the GDNs and commence our analysis. However we now understand the GDNs will not be in a position to make detailed submissions until the end of this year. This makes the timing of this price control extremely challenging. Therefore there is a responsibility on GDNs to provide all information relating to the price control in a timely manner.
- 6.2 As mentioned previously in this paper, we are proposing to produce a full price control in 2013, to cover the five year period from 2014 to 2018.
- 6.3 We would highlight that if a full price control is to take place, the time constraints will mean we will be focusing our efforts on capex, opex and volumes and this may lead to a number of re-openers being included in the price control.
- 6.4 We have set out the key milestones to GD14 below, and a draft high level timetable is shown on the following page.

<b>Key Milestones of GD14</b>	
<b>Key Points</b>	<b>Proposed Date</b>
Consultation on Approach to Price Control for GDNs	December 2012
Submission by firmus & PNGL of business plans (including actual data for previous years)	End December 2012
Stakeholder Engagement	February - April 2013
Submission to UR Board of Draft PC Determination for Public Consultation	9 May 2013
Publication of Draft PC Determination for Consultation	4 June 2012
Stakeholder Engagement during consultation period	June - Jul 2013
Closure of Public Consultation	16 Aug 2013
Submission of Final Determination to the UR Board	13 Sept 2013
PC Final Determination Published	30 Sept 2013

## PNGL and firmus High Level Gantt Chart

Key Headings		Year	2012			2013												
		Months	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	
	Submission of Information																	
1	Actual Data and Business Plan submitted by PNGL and firmus 2007-2011				★													
2	UR review of submission, queries addressed to PNGL and firmus																	
3	All clarifications finalised and submitted to UR						★											
	Main areas for Review																	
4	Opex, Capex, Financaibility, Rate of Return, Volumes of Gas, Retrospective Adjustments and Models, Post Competition Commission Considerations (PNGL Only), Efficiency Review																	
	Develop Determination																	
5	Develop template Determination doc, populate where possible																	
6	Determination finalised and issued, plus licence mods if appropriate									★								
	Consultation																	
7	Consultation on “Draft Determination”												★					
	Stakeholder Engagement																	
8	Engage with interested 3 <sup>rd</sup> parties on the implications of the PC																	
	Consideration of Consultation Responses																	
9	Update Draft Determination for issues raised in consultation																	
	Finalise Determination																	
10	Determination finalised and issued, plus licence mods														★			

Key:

Activity to be completed	
Milestone (If Missed, this will delay PC)	

## 7 Consultation Process

- 7.1 This is an open consultation. We have not posed any specific questions in this paper. Instead we invite stakeholders to express a view on any particular aspect of the paper. Responses should be received by 5 pm on **Monday 14<sup>th</sup> January 2013** and should be addressed to:

Paul Harland  
Gas Distribution  
Utility Regulator  
Queens House  
14 Queen Street  
BELFAST  
BT1 6ER

Tel: 028 9031 6652

E-mail: [paul.harland@uregni.gov.uk](mailto:paul.harland@uregni.gov.uk)

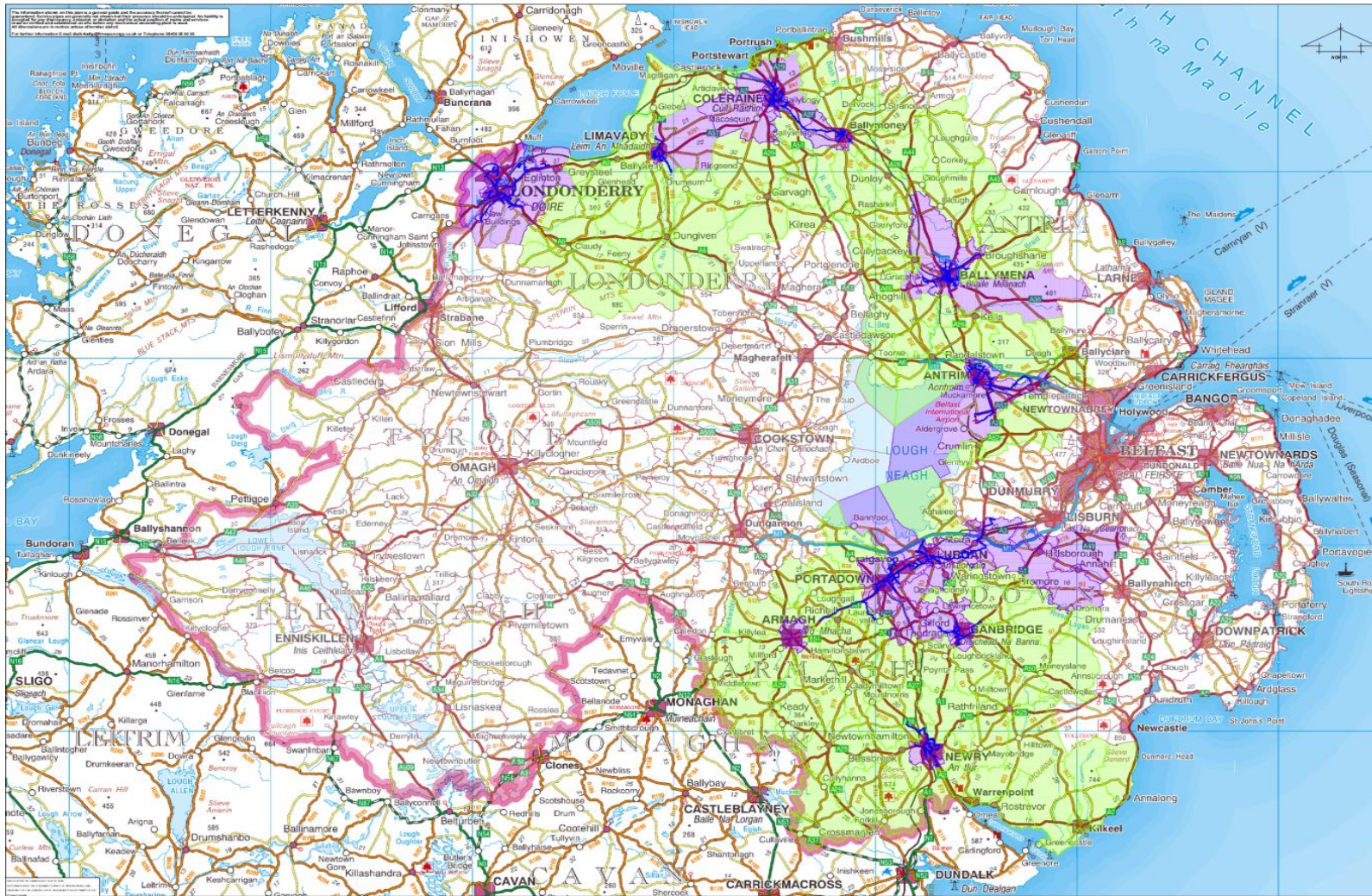
- 7.2 Our preference would be for responses to be submitted by e-mail.
- 7.3 Individual respondents may ask for their responses in whole or in part, not to be published, or that their identity should be withheld from public disclosure. Where either of these is the case, we will ask respondents to also supply us with the redacted version of the response that can be published.
- 7.4 As a public body and non-ministerial Government department, we are bound by the Freedom of Information Act (FOIA) which came into full force and effect on 1 January 2005. According to the remit of FOIA, it is possible that certain recorded information contained in consultation responses can be put into the public domain. Hence, it is now possible that all responses made to consultations will be discoverable under FOIA – even if respondents ask the Utility Regulator to treat responses as confidential. It is therefore important that respondents note these developments and in particular, when marking responses as confidential or asking the Utility Regulator to treat responses as confidential, should specify why they consider the information in question to be confidential.

## Appendix 1: Map of the PNGL Greater Belfast and Larne Licensed Area (Coloured)





## Appendix 2: Map of the firmus Ten Towns Licensed Area (Coloured)<sup>3</sup>



<sup>3</sup> Map to be updated to reflect recent changes to licensed area