

**PRICE CONTROL  
FOR  
NORTHERN  
IRELAND'S GAS  
TRANSMISSION  
NETWORKS GT27**

**Business Plan Overarching Guidance  
26 February 2026**

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## Annexes

Annex	Description
Annex A	GT27 Business Plan Reporting Requirements
Annex B	GT27 Business Plan Assessment Guidance
Annex C	GT27 Business Plan Reporting Template

# 1. Introduction

## Overview

- 1.1 This document sets out the Utility Regulator's (UR) overarching guidance for the completion and submission of the various Business Plan Templates (BPTs) for the GT27 price control period.

## Legal framework

- 1.2 The data submission shall be provided under Condition 1.3 of the Gas Conveyance Licences (Provision of information to the Authority) pertaining to each licensee, Belfast Gas Transmission Limited (BGTL), Premier Transmission Limited (PTL), West Transmission Limited (WTL) all as part of Mutual Energy Limited (MEL) and Gas Networks Ireland (UK) (GNI (UK)). Collective these are the gas Transmission System Operators (TSOs). Also covered here is data to be submitted by the Gas Market Operator Northern Ireland (GMO NI).

## Relevant period and timescales for reporting

- 1.3 The relevant reporting year for the provision of information runs from 1 October to 30 September of the following calendar year. For example, a reporting year of GY 2024-25 means the year ended on 30 September 2025. This convention applies throughout the Business Plan Reporting Templates (BPRTs).
- 1.4 The licensee must provide the information required under the various BPRTs by the 11 June 2026. This is the same deadline as for the submission of the GT27 business plans.

## Review following submission

- 1.5 Once the licensee has submitted the data, UR will undertake its detailed review of the information. A formal Query Process is envisaged as starting as soon as the GT27 business plan is submitted by 11 June 2026. The Query Process will involve further information requests to the licensee to clarify specific aspects of the GT27 business plan submission and, consequently, further queries to licensee responses may in addition be raised, as appropriate.

## Template errors

- 1.6 In the event of any errors being identified after the templates have been sent out to the licensee for completion, the following procedure should be followed:
- 1.7 Upon identifying an error, notify us by email to [Gas\\_networks\\_responses@uregni.gov.uk](mailto:Gas_networks_responses@uregni.gov.uk) detailing the nature of the error. Do not correct the error in the version to be submitted to us without prior guidance by us to do so.
- 1.8 We will respond and, if necessary, provide guidance on correcting the error.
- 1.9 We will maintain a log of known issues for consideration when preparing future BPRTs and annual/cost reporting master templates.

## 2. Business Plan Submission

### Introduction

- 2.1 Separate GT27 reporting templates have been produced for MEL (aggregated in a single workbook), GNI(UK), and the GMO NI, with common formats across worksheets so line-level guidance is consistently applicable. TSOs should jointly complete the GMO NI return where specified.

### Requirements

- 2.2 The submission should be made in the following formats:
- GT27 BPRT Reporting Workbooks in Microsoft Excel, using the provided GT27 templates (PDF submissions are not permissible for Excel-based workbooks).
  - A single commentary document (Word or PDF) covering all template areas, structured into chapters that mirror the GT27 tables (see Annex C).
  - Visual clarity is essential (using a minimum font size of 10 and maintain appropriate margins).
  - Any additional documentation requested in the table guidance or commentary and any supporting annexes.
- 2.3 In support of the drive towards the provision of high-quality robust submissions, we expect the licence holders to:
- Demonstrate that responsibility for the assurance of the data and plans submitted resides at Board level. We are seeking a Board Assurance Statement to the effect that TSO business plan aligns with UR's regulatory principles and approach as set out within this approach document and that the Board Assurance Statement should accompany submission of the business plan.
  - Provide reliable driver-based cost information with appropriate explanations of any changes in numbers or circumstances.
  - Clearly detail any projects that are being carried over from GT22 into GT27 so that consistency of project scope can be evaluated.
  - Provide any information requested within the timelines specified.

- Be able to demonstrate that all costs are necessary to run an efficient, well-managed business.
  - Demonstrate the basis of apportionment of costs shared between group and related parties.
- 2.4 Submissions should only include relevant framework items to that licencee.
- 2.5 Submissions must include a Strategic Summary with their final business plan. This summary should outline the main data and key points from the plan.
- 2.6 If submissions include consultant reports to support the business plan, they should provide executive summaries in the relevant sections. The full reports should be added as annexes, and each summary should clearly refer to the corresponding annexed report.
- 2.7 Subject to the above, only the documents set out in the table below should be as part of their business plan.

**Table 2.1: List of business plan submission documents**

Document name	Page count limit
Strategic Summary	1
Business Plan Main Document inclusive of Operating Expenditure, Asset Replacement and Refurbishment Expenditure, and Required Revenue Forecast	70
Energy Transition	30
Weighted Average Cost of Capital (WACC)	Unrestricted but encouraged to be precise
Board Assurance Statement	2-3

## General instructions and guidance

2.8 The data submission in excel should be made in the defined formats which are further outlines in Annex A but summarised below.

2.9 It should be noted that not all table numbers will be applicable to all licensees.

- **Reporting Scope:** Report costs for Administration, Repex, Maintenance (planned & unplanned), System Operation (TSO & GMO NI) and Uncontrollable Opex using Table 1 – Total Costs, with disaggregation and cross-checks as defined.
- **Historic & forecast data:** Populate historic data (-5 to -3) reconcilable to accounts and forecast data (-2 to 5) in real 2025–26 prices using CPIH from the Inflation tab. Use 3 decimal places unless otherwise stated.
- **Consistency & no double counting:** Where staff costs appear elsewhere, ensure Table 2 Staff tables comprehensively capture all staff cost elements and remove any duplicates in other tables.
- **Audit checks & formula integrity:** Follow audit checks embedded in tables and do not change formulas or formats (including insertion/deletion of rows/columns) unless instructed by UR, if changes are essential, maintain a changes log.
- **GMO NI alignment:** Elements of the GMO NI template appear in TSO submissions. Ensure accurate transcription and alignment across returns.
- **Units & decimals:** Respect per-line unit types (e.g. £m, %, nr, kWh) and decimal precision as specified in each table line.
- **Projects:** Any projects submitted should have a project number attached to it. This number will be retained for this project for the duration of GT27 to ensure that the scope of each projects remains the same. While projects can be explained in detail, we request that a summary of each project be provided in the below table format.

**Table 2.2: Project summary table (Example)**

<b>Project Number &amp; Name</b>	<b>Total Value Requested</b>
1 – Project Name	£100,000
<b>Project Synopsis</b>	
Overview of project	
<b>Outputs</b>	
Overview of project outputs	
<b>Project Milestones</b>	
Indicative dates for project milestones	
<b>Project Spend Profile</b>	
Yearly profile of spend including any recurring annualised costs that will result from completion of the project	

## Frontier shift and efficiency application

2.10 Use the Supplementary Frontier Shift table (indicative) to assess the annual and cumulative efficiency impact (compound effect of input price inflation vs CPIH and productivity growth) with weights initially derived from GT22 and updated at Draft/Final Determinations. Frontier shift assessment across all five entities should be undertaken jointly with the same challenge then applied in each business plan.

- Note: Where explicitly stated (e.g. Energy Transition (ET) project costs), no additional efficiency challenge is applied beyond the direction indicated in Table 10 line guidance.

## Energy Transition

2.11 Energy Transition (Table 10) captures projects strictly related to energy transition and not business as usual (BAU) Repex (Table 6). Provide project-level rationale, needs case, options appraisal, cost breakdown,

outputs, and consumer benefits (aligned with the DfE Energy Strategy). The template indicates that no frontier shift/efficiency challenge is applied to ET project costs (copy total from line L44 to L55).

## **Cost of Capital (GNI(UK)) & MEL Bond Repayments**

- 2.12 Table 8 requires GNI(UK) cost of capital inputs (gearing, cost of equity, cost of debt, vanilla WACC, RAV) and MEL bond repayments (PTL, BGTL, WTL), with real-terms recording and the inflation basis as specified in the Inflation tab (note the use of CPIH in this table per Annex A guidance). We note that MEL bond repayments are linked to RPI. Provide supporting commentary on equity beta estimation and debt costs.

## **Business Plan Assessment**

- 2.13 When we receive the TSO's business plan we will assess how it has performed. This assessment is built up from the categorisation below for each of the theme areas.
- 2.14 This is structured around several questions which we would ask when we assess the quality of the business plan submission. These are grouped under 4 key themes and areas which are set out below:
- Theme 1 - Service contribution to good outcomes.
    - (ii) Area 1: Delivering value for money for Consumers.
  - Theme 2 - Services and costs
    - (iii) Area 2: Delivering services and outcomes.
    - (iv) Area 3: Aligning Risk and Return.
  - Theme 3 - Trust in delivery
    - (v) Area 4: Engaging customers, consumers and other stakeholders.
    - (vi) Area 5: Ensuring resilience.
    - (vii) Area 6: Accounting for past delivery.
  - Theme 4 - Transition to net zero
    - (viii) Area 7: Aligning with government net zero policy
    - (ix) Area 8: Delivering outcomes which will contribute to net zero targets

- 2.15 We will ask the TSOs to score themselves against these questions and we will then consider how they have performed in relation to these criteria. We will provide feedback on our view of the quality of their business plan submission within our Draft Determination. This approach is consistent with the approach to other network companies e.g. NIE Networks, SONI and the Gas Distribution Network Operators (GDNs).
- 2.16 Annex B to this document provides further information on our approach to assessing the TSO business plans for GT27.

### **Submission and resubmission**

- 2.17 The complete GT27 business plan submission, for all work areas set out above with all the elements in the required formats, must be submitted electronically to the following email address:  
[Gas\\_networks\\_responses@uregni.gov.uk](mailto:Gas_networks_responses@uregni.gov.uk)
- 2.18 URs agreement is required before any resubmission of information set out in a report produced in accordance with either the RIGs and/or GT27 business plan submissions. In any such instance all impacted documents for all impacted work areas must be resubmitted in full, unless UR has agreed otherwise.
- 2.19 For any resubmission, a separate explanation must be provided listing each cell number / text, that has been amended along with sufficient commentary to explain any such amendment(s) made.
- 2.20 A query process shall begin immediately upon submission of the entire business plan submission, comprising the BPRTs, GT27 business plan plus Executive Summary on 11 June 2026.

### 3. Reporting Workbook

#### Purpose

- 3.1 The GT27 BPRTs provide a consistent reporting template for TSOs and the GMO NI to enable comparability and transparent understanding of cost movements over time. The structure will also underpin ongoing annual cost reporting.

#### Workbook structure

- 3.2 The GT27 template (Annex C) contains Index & navigation, Key, Inflation, Frontier Shift, and the main tables (1–10), including group summaries and company-level sheets for PTL/BGTL/WTL:

- **Table 1:** Total Costs (Administration, Repex, Maintenance, System Operation (TSO & GMO NI), Uncontrollable Opex, ET, totals, pre/post-efficiency).
- **Table 2:** Staff Costs (FTE by salary band, direct/indirect/agency costs; pre/post-efficiency), with sub-tables for Support Staff (2a) and Engineering Staff (2b) and a GMO NI contribution table (2c).
- **Table 3:** Administration Costs (pipeline insurance, intra-company recharges, other overheads, mutualisation; pre/post-efficiency; cross-checks to Table 1).
- **Table 4:** Maintenance Costs (planned/unplanned; activity levels; network data; pre/post-efficiency; embedded audit checks).
- **Table 5:** Uncontrollable Costs (rates, licence fees, fuel/shrinkage/imbalance, Scottish costs, offsetting income; with totals & checks).
- **Table 6:** Repex projects with audit link to Table 1.
- **Table 7:** Asset Inventory (pipelines, entry/exit points, block valves, PIG traps, AGIs; fields for diameter/length/design life/pressure; MEL summary from 7a/7b/7c).
- **Table 8:** Cost of Capital (GNI(UK)) / MEL Bond Repayments (PTL, BGTL, WTL).
- **Table 9:** Carbon Reporting (non-shrinkage BCF across buildings, transport, fugitive emissions, fuel combustion), GHG Protocol compliant.

- **Table 10:** Energy Transition (totals; link back to Table 1 energy transition totals; policy on no efficiency challenge).

## Working with linked workbooks

3.3 Where worksheets are designed to link to other workbooks (e.g., MEL group summaries):

- Save workbooks locally and re-establish any links needed for operation.
- Retain links in the submitted version to allow the Authority to re-establish them.
- Break all external links to your own systems before submission.

## Data entry rules

3.4 Follow the colour-coded input rules and checks embedded in the templates (e.g., input vs calculated vs copied cells; audits marked “OK”). Do not overwrite non-input cells, avoid changing formulas/formats, and keep zeros as zeros (not blank) unless a blank is explicitly required. Provide numbers as numbers and text as text, with precision per line guidance.

## 4. Commentary Document

### General instructions and guidance

- 4.1 Submit a single commentary covering all GT27 tables, with a chapter per template area (e.g., Total Costs, Staff, Administration, Maintenance, Uncontrollable, Repex, Asset Inventory, Cost of Capital, Carbon, Energy Transition). Use the commentary to:
- Explain allocation methodologies and any changes over time, including indirect cost allocations and capitalisation policies.
  - Justify forecast movements, atypicals, one-offs, and any real-terms increases.
  - Document any formula changes (other than UR-directed) required to complete worksheets.
  - Provide assurance steps undertaken: areas reviewed, scope, techniques, outcomes, and learning for future reporting.
  - Include supporting documentation and attach Annexes electronically; structure file names in the order they appear in the commentary.
  - For Frontier Shift and ET, explain rationale, inputs, and treatment of efficiency per the line guidance (e.g., no efficiency to ET totals).

### Naming convention

- 4.2 Use commentary and annex file names that reference the relevant section and follow the order of appearance in the commentary document.

## 5. Glossary of Terms

- 5.1 GT27 carbon reporting must comply with the Greenhouse Gas (GHG) Protocol principles (Relevant, Complete, Consistent, Transparent, Accurate). Where corporate-group allocations are needed, define reporting boundaries and apportionment methods clearly in the commentary.

## 6. Data Assurance

- 6.1 It remains the licensee's responsibility to demonstrate to UR the robustness and suitability of its own data assurance and risk reduction measures.
- 6.2 In line with other price controls, we require the licensee to demonstrate that responsibility for the assurance of the data and plans submitted resides at Board level. We are seeking a Board Assurance Statement to the effect that TSO business plan aligns with UR's regulatory principles and approach as set out within this approach document and that the Board Assurance Statement should accompany submission of the business plan.