



DCC Price Control RY24/25 – Financial Reporting Commentary

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1. Introduction and purpose

The purpose of this document is to set out the supporting financial information for the DCC Price Control 2025 submission, also known as Price Control Information¹. In summary it sets out:

- The assumptions applied in populating the Regulatory Instructions and Guidance (RIGs) template.
- Responses to questions in the RIGs template (worksheets 3, 8 and 9).
- Specified information: supporting questions 9.7; 9.8; 9.14; 9.16; and 9.17.
- Commentary and justification (if required) for the penalty interest regime.

2. Developing the RIGs forecast

The RIGs forecast is the forecast costs included in the RIGs price control templates. These were determined as part of the business planning process undertaken in early 2025, which focusses on forecasts for the next five years.

We allocate all forecasts to one of two categories they are 'committed' or 'discretionary'. The forecasts included in the price control forecast are only those deemed 'committed' as these meet the certainty threshold required for price control i.e. more likely to be incurred than not. For this reason, the RIGs forecast will always be lower than the forecasts included in the quarterly charging statements and budgets. Factors used to determine which category to assign costs are:

- Committed – all costs subject to signed agreement, for changes it will be only those that have an associated Change Authorisation Note (CAN).
- Discretionary – expected but not yet contracted e.g. Change Requests (CRs) raised but not yet contractually, contingency, etc.

The following sections set out some key assumptions made when setting the RIGs forecast.

2.1. Internal costs

2.1.1. Payroll, non-payroll, and recruitment

These three General Ledger (GL) codes² fall under what we call 'resource' costs. We have included forecasts³ for these categories for all future years, detailed justification has been provided for RY25/26, RY26/27 and RY27/28 only.

¹ Price Control Information is defined as the Specified Information contained in any RIGs issued by the Authority under Condition 33 as is required to be reported to the Authority in accordance with this condition, in such manner, to such extent, and subject to such further definition as may be set out in those RIGs.

² [Data Communications Company \(DCC\): Regulatory Instructions and Guidance 2024 | Ofgem.](#)

³ These are forecast that do not influence or guide the future Ex-Ante forecasts.

2.1.2. Internal services

Internal services are largely contractual in nature and represent certain services sourced from our parent company Capita. Wherever possible, we have estimated cost forecasts based on the known contracted values and end date. There are some contracted services which we know will be required beyond the contract end date. For those, we have produced estimates based on a cost trend of the existing services.

2.1.3. IT services

IT services are forecasted in a similar manner to external and internal services in that we base estimates on existing contracted values and end dates, or extensions where we know services will be required beyond the contract end date. There is a variable element to this, which is based on headcount.

2.1.4. Accommodation

Accommodation forecast costs are based on annual contract values and contract terms. All accommodation costs are recognised in the Corporate Management cost centre.

2.1.5. All other costs

External services and service management costs are based on contracts with specific start, end dates, and values. Therefore, we have forecasted to contract end date, distributing the cost evenly if there are no milestone payments or when it crosses over multiple regulatory years. There are some small values against the 'office sundry' category such as subscriptions.

2.1.6. Additional baseline and new scope

In this year's submission, there are no new items under either 'additional baseline' or 'new scope' (see tab 5 of the main RIGs file).

2.2. External costs

2.2.1. Set-up costs

Where set-up costs extend beyond the length of the DCC Licence they have not been included in the RIGs. This means that a CAN value or total contract value may be higher than the total included in the RIGs for the related CR or contract.

User Integration Testing (UIT) charges and Communication Hub (CH) asset and maintenance charges are shown as invoiced in the respective lines in baseline. Variations comprising of CRs, indexation impact, and volume changes will be explained as part of the variance explanation.

As in previous years, financed set-up costs are reflected as they are invoiced, within finance tranches. These finance tranches may include multiple CRs and projects that have been delivered but are invoiced in accordance with the financing tranche payment schedule. In Annex 3 of the RIGs, this is reflected as single lines – e.g. Financing Tranche 1. Explanations in the narrative will be provided based on material CRs and projects within these categories. To provide more detail on the components of the financing tranches, supplementary schedules have been provided alongside the RIGs submission.

2.2.2. Fixed operational charges or enduring costs

Where these costs extend beyond the length of the DCC Licence they have not been included in the RIGs. This means that a CAN value or total contract value may be higher than the total included in the RIGs for the related CR or contract.

All fixed operational charges billed as a single value for fixed operational charge each month from the supplier are shown in the 'fixed operational charges' or 'enduring costs' line in baseline external costs. Variances to Licence Application Business Plan (LABP) and prior year regulatory reporting, which will comprise new CRs and indexation, will be explained as part of the variance explanation. Indexation is not shown separately in the RIGs; it is explained in Section 6.4 of this document.

3. RIGs worksheet 3: the correction factor

Q1: Please provide associated commentary regarding the Correction Factor. This should include commentary regarding significant components of the Correction Factor (such as prudent budget, credits from service provider performance, unclaimed service provider incentive payments, related interest received).

The cumulative correction factor as at the end of RY24/25 is £54.99m. This correction factor is the total of variances between Regulated Revenue and Allowed Revenue for each Regulatory Year, adjusted for indexation, as shown in the table below. Variations for all prior years have been explained in prior year submissions; therefore, we have focussed the explanation on the variance for RY24/25.

	RY13/14	RY14/15	RY15/16	RY16/17	RY17/18	RY18/19	RY19/20	RY20/21	RY21/22	RY22/23	RY23/24	RY24/25
Regulated Revenue	19.5	44.8	115.643	241.209	257.924	403.647	518.434	642.496	563.861	608.612	667.198	686.452
Allowed Revenue	13.396	32.181	99.169	195.873	220.761	371.213	469.921	593.978	492.09	538.258	635.154	719.888
Annual correction factor	-	-6.134	-6.548	-3.843	-28.972	8.086	4.745	-15.896	-0.05	-26.328	1.07	22.32
Cumulative correction factor		-6.134	-12.682	-16.525	-45.497	-37.411	-32.666	-48.562	-48.612	-74.94	-73.87	-54.99

Table 1: Annual correction factor, RY13/14 - RY24/25 (£m)

Table 2 below sets out the key components of the variance for RY24/25, which contributes to the correction factor.

	Ry24/25

Table 1 – Correction factor components RY24/25 (£m)

⁴ Communications Hubs

Regulated Revenue for RY24/25 comprises Fixed Charges (including Fixed CH Charges and Fixed Alt HAN Charges) invoiced to customers in accordance with the Charging Statement for RY24/25 and explicit charges invoiced to customers for specific additional products or services e.g. user gateway connections, remote test labs, Competent Independent Organisation (CIO) assessments and test hubs and interest accrued on cash balances in the year.

The main components driving a variance between Regulated Revenue and Allowed Revenue shown in the table above include:

- Additional revenue from additional meter numbers
- When we set charges in December of each year, they will be based on a forecast of meters in the following April. This is based on a rolling 12-month historic average. However, meter numbers can change significantly in-year, which can be difficult for DCC to predict as it usually associated with number of new homes being built in the year.
- Fixed CH charges and Explicit Charges revenue lower than forecast
- Revenue received for Fixed CH Charges and Explicit Charges was £118.2m, actual spend was £114.3m.
- Explicit Charges revenue is challenging to forecast as explicit charge items are requested by customers as and when they are required.
- CH costs will depend on volume which depend on customer rollout profiles. These can vary significantly to what we include in our CH forecast models when setting charges.
- Timing adjustments
- This reflects differences due to the timing of receipt of invoices and relevant payment terms.

3.1. The correction factor and its impact on RY24/25 charges

We use the correction factor to:

- return (or recover) any difference between Allowed Revenue and Regulated Revenue with respect to the prior Regulatory Years (which may include the prudent estimate); and
- to reflect any incurred costs disallowed by Ofgem.

Four categories of correction factors apply, they are:

- Main correction factor
- Single Band CH correction factor
- Dual Band CH correction factor
- Alt HAN correction factor

These are separated as they apply to different charges payable by different customer types.

Under the standard correction factor process, any over/under-spend is returned/recovered from customers two years later; this is because all expenditure is subject to Price Control. All allowed

expenditure for a given year is therefore confirmed almost a year after the end of that period and reflected in the following years charges⁵.

In March 2025, we reduced the Fixed Charge per meter to effectively return £36.6m of underspend to customers before the end of the Regulatory Year, outside of the usual 2-year Correction Factor cycle. As this adjustment was made in-year, the reduction in Regulated Revenue for RY24/25 in Table 1 has already been recognised, so the adjusted amount is not classified as a post-year Correction Factor for the purposes of this submission. An explanation of this adjustment was included in our Notice Letter to Ofgem while requesting a reduced notice period.

4. RIGs worksheet 8: Regulated Revenue v statutory revenue

Q1: Where Regulated Revenue differs from revenue as presented in the statutory accounts, please provide an explanation of the divergence between these.

The revenue reported in the statutory accounts for the year ended 31 March 2025 was £514.3m. The Regulated Revenue for the same period was £686.5m.

	RY24/25
Regulated Revenue	686.452
Revenue reported in the statutory accounts	514.300

Table 2 – Variance between Regulated Revenue and statutory accounts revenue (£m)

The main contributors to the variance include:

- **Annual correction factor** – see Section 3 of this document.
- **Explicit and CH charges recognised on the balance sheet** – in the statutory accounts, these charges are accounted for on an agency basis which means that they are not reflected as a cost or revenue in the income statement, but on the balance sheet as a liability or asset instead. They are, however, recognised within the Regulated Revenue reported as part of the Price Control Information.
- **Net impact of milestone and finance charge accruals offset against invoicing for External costs and work in progress (WIP)** – DCC finances material set-up costs over several years to smooth charges to its customers. Those finance payments begin upon completion of relevant milestones. The statutory accounts include the full value of those milestones as and when they are achieved plus financing costs accrued in each month and the value of WIP not yet

⁵ For example, under the standard process all allowed expenditure in RY21/22 (ending March 2022) was confirmed in February 2023, therefore it would have been reflected in RY24/25 charges therefore paid/recovered in full by March 2025.

invoiced. Price Control Information, however, includes the monthly financed payments associated with those milestones as and when they are invoiced to DCC which include finance costs. The difference between those two values for RY24/25 is reflected in Table 3.

- **Depreciation of assets capitalised on the balance sheet** – these assets are in relation to the Manchester office (Brabazon House). In the statutory accounts, DCC recognises this as an asset due to the nature of the lease asset in place for this office. Therefore, these do not appear as an expense in the statutory accounts. The Price Control Information, however, reflects the lease costs invoiced to DCC.
- Timing of recognition of Baseline Margin (BM)/External Contract Gain Share (ECGS)/disallowed costs in Annual Report vs Price Control – the revenue reported in the statutory accounts reflects accruals for these items in the periods to which they relate. The Regulated Revenue reflects these costs in the Regulatory Year in which they can be charged to customers, in line with Ofgem's direction.

5. RIGs worksheet 9: cash-flow

5.1. Cash-flow

Q1: Please provide a supporting commentary of the Smart Meters Communications Licensee's monthly cash flow balances

5.1.1. Factors impacting cash-flow

The monthly cash-flow balances are driven by the following factors with respect to cash payments and receipts:

- Invoices to SEC Parties are charged on the third working day of each month following the charging period. Payments are received within five working days following the receipt of the invoice.
- Internal Costs, Baseline Margin and corporate overhead are invoiced by CBSL (Capita Business Services Limited) to DCC monthly, in arrears. Cash settlement is usually made in the month following receipt of the invoice.
- VAT is charged on invoices at 20 per cent, and payments to HMRC are due quarterly in February, May, August and November.
- Pass-Through Costs to SECCo Ltd and AlthANCo Ltd for the year are based on their respective budgets and are normally charged in 12 equal monthly instalments. Invoices are received monthly in arrears and payment terms are 30 days and 10 days respectively. For SECCo Ltd, after the year-end, a balancing credit or debit is calculated and issued.
- DCC pays invoices for Internal, External and Pass-Through Costs within 30 days after invoice, depending on the payment terms.

5.2. Cash balances in RY2024/25

At the end of March 2025, our closing cash balance was £82.97m. Of this, £36.05m was credit cover held for customers and £46.92 was available to cover liabilities due at the end of the year, including VAT payments, invoices due to suppliers and other Service Providers, and short-term accruals.

Table 4 shows the breakdown of month end cash balances in RY24/25 between the trading account and the credit cover deposit account.

£m	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25
Trading Account												
Credit Cover												
Cash Balance												

Table 3 – Breakdown of month end cash balances in RY24/25

5.2.1. Forecast cash balances in RY25/26

At the end of RY24/25 the closing cash balance was £82.96m with £46.92m in the Trading Account.

£m	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26
Trading Account												

Table 4 – Breakdown of month end cash balances, RY25/26 (£m)

5.3. Liquidity Requirements

Q2: Please explain the operating liquidity requirements of the licensee's business. What are the factors impacting on peak business cash-flow requirements?

It is very important that DCC provides predictable forecasts to its customers so that they can manage costs and cashflows ahead of time. Most of the receipts from customers are based on a fixed charge per meter and are set in advance; therefore, cash inflows are relatively consistent on a month-by-month basis. DCC's ability to remain liquid is dependent on the accuracy of its cost forecasting, which forms the basis of the advance charges to customers. DCC maintains a policy of charging enough to be able to meet its cost obligations without increasing charges in the year, in line with our Licence obligations. Where feasible we have returned funds to customers within the year as part of the final charging statement, amending monthly charges for the last 2 or 3 months of the year. This has been done in RY17/18, RY18/19, RY20/21, RY21/22, RY22/23, RY23/24 and RY24/25.

Several of DCC's costs have payment profiles that can be reasonably forecast across the course of the year. They are either made up of regular, fixed payment amounts, or they are known in advance, for example Baseline Margin amounts stipulated in the Licence. These cost elements include the following:

- Pass-Through Costs to SECCo Ltd are agreed in advance at the beginning of the year. The charge is normally spread across the year in 12 equal monthly instalments. At the end of the year, a balancing debit or credit amount is charged to DCC and is settled in the following Regulatory Year;
- The Baseline Margin in any given year is defined in the Licence and is therefore known in advance for the entirety of the Licence term;

- Rent, rates and service charges are outlined in our lease agreements which are fixed for a set period, subject to inflation;
- Resource costs for permanent DCC staff can reasonably be estimated month on month. Costs for contractors and new resources are more difficult to forecast with certainty;
- An element of costs with Service Providers that are made up of fixed charge amounts; these costs are defined in their contracts. These can also include financing payments made either to FSPs or directly to banks.

The factors affecting DCC's peak cash-flow requirements are therefore driven by expenditure with less predictable or fluctuating payment profiles and values. These include:

- SMETS2 External Costs: Expenditure to our FSPs is based on contractual payments and represents DCC's largest cash outflow. Operational costs are stable with variability expected on the programme spend, most notably the two annual June and November release which includes SEC Modifications.
- SMETS1: Expenditure on SMETS1 is now stable and is based on contract payments following go-live.
- Network Evolution: Network Evolution covers a wide range of programmes focused on the preparation for the 4G mass roll out commencing in summer 2025. The costs and timing for this programme are material. Both programme team and finance function continue to track spend against the programme forecast. Since RY22/23 DCC has arranged long term financing for the CH&N DBT programme to smooth DCC charges to customers over a 5 year period.
- Resource costs: the timing of recruitment and volume of FTE can be impacted by any changes in key programmes. We tend to find that short-term FTE can be required for longer to support any additional activity required which was not known in sufficient detail at the beginning of the year.

5.4. Prudent Budgeting Arrangements

Q2: Please explain how prudent budgeting arrangements have been applied in managing the licensee's cash balances. Please provide supporting assumptions.

5.4.1. Management of cash balances

DCC does not aim to (and has not, to date) asked for additional funds from customers mid-way through a regulatory year. In fact, over the last few years, DCC took proactive steps to return cost savings to its customers earlier than it would have done through the correction factor mechanism. This was repeated in RY2024/25 where we returned £55.7m to customers.

DCC's key step to prudent budgeting is the maintenance of a detailed cash-flow forecast, updated and reviewed monthly, with comparison to actuals, to determine the timing of significant cash inflows and outflows. DCC engages in a continuous, ongoing process of risk assessment and review with respect to cash outflows. This ensures that cash balances do not fall to levels that are too low at any point in time.

By the end of this regulatory year through the enhanced treasury processes DCC's cash balances have returned to operate within the healthy cash range. As mentioned above, DCC returned £55.7m of cash back to their customers. DCC is actively working with Ofgem to look at further cash

management changes, this will enable the organisation to return additional cash to customers well ahead of the licence renewal.

The cash balance fell below the healthy range in June following the reduction in charges towards the end of RY24/25, however this was actively monitored by management and is forecast to return within the range for July 2025.

Ofgem has asked DCC to return as much of the Correction Factor as possible before the current licence ends (27.3B.). RY24/25 has seen a material reduction in the cumulative Correction Factor driven by cash repatriation during that year. DCC is balancing the target of reducing the Correction Factor by license end date whilst maintaining cash within DCC's healthy range. The cumulative Correction Factor at the end of RY24/25 has already reduced, close to the top end of the cash healthy range. DCC will continue to focus on cash management to return as much of the Correction Factor as possible whilst maintaining sufficient operational cash to ensure DCC can continue to operate effectively during the transition from DCC1 to DCC2.

Internal and External cost forecasts are prepared, challenged, and maintained by the Finance Business Partners (FBPs). They are reviewed on a quarterly basis as part of the DCC lock process (see further info below) and form the basis of indicative charging statement updates to customers. The management of the cash-flow forecasting process is further supported by the following activities:

- Bottom-up annual budget process that involves the challenge of all existing assumptions.
- Quarterly reforecasting and review process with the business, including all DCC internal budget owners and external providers. This involves interlocking of programme delivery with support functions provision of resources.

The Board has the ultimate responsibility for assessing risk and making strategic cash-flow decisions. The overall process is in place to ensure that costs are challenged robustly to ensure that DCC only spends money where necessary and that it can justify as being economic and efficient in the overall delivery of DCC services.

How do we apply prudent budgeting arrangements?

The cash forecasting process is broadly based around three factors:

- Consideration of any commitments for the year ahead.
- Consideration of the revenue to be collected through the period.
- Opening and closing cash balances at the end of that period.

Understanding our commitments to forthcoming expenditure is therefore the key driver in understanding our required cash inflows, and thus, developing a prudent budget.

External costs

External costs make up the largest future cash commitments for DCC and, therefore, uncertainties in timing and volume with respect to these items have the most material impact on our cash-flow forecasting. The following specific assumptions are made with respect to cash outflows for External costs when preparing the monthly cash forecast data:

- The timing, value and profile of cash outflows are assumed to be in line with the current contracts with FSPs.

- The timing, value, and profile of cash outflows with respect to agreed contract changes are assumed to be in line with details outlined in the change authorisation notes, or in line with details provided directly from the FSPs via the commercial team.
- Where contract changes have not been approved, the value of the cash outflow is assumed to be in line with the latest Impact Assessment value received from the FSPs.
- For contract changes where an Impact Assessment is not yet available, a judgement is made to establish a 'rough order of magnitude' for the value of the contract change using information provided from the FSP. Where the FSP provides a range for the 'rough order of magnitude', we use the midpoint as the best estimate.
- Where the FSP cannot provide an early indication as to the magnitude of the change value, we use historic information for similar changes proposed, or values proposed for the same change by other Service Providers as a basis. One or more changes with a similar nature and magnitude are chosen as a benchmark.
- The Finance Business Partners work closely with the programme, design & assurance, and operational teams to understand the pipeline of activities they have identified as future spend. The relevant size and payment profile of these changes are analysed against existing changes and added to our forecast of future activities.

Internal Costs

The following specific assumptions are made with respect to cash-flows for Internal costs when preparing the monthly forecast data:

- The basis of cash flow forecasts for Internal costs is the budget set at the start of the year for each business area. The uncertainties around the delivery timetable and the changing timeline of the plan have a direct impact on Internal costs as teams review and amend their recruitment plans.
- Monthly financial performance review meetings are undertaken with budget owners. Any material costs that the budget owner is aware of but for which a business case is still outstanding will be included in the cash-flow forecast using the budget owners' most up-to-date cost and timing assumptions.
- Rent, rates and service charge cost information are based on amounts included in our lease agreements and is known to be charged monthly. Other accommodation costs associated with the maintenance of the building are estimated and included using historic data as a basis for any assumptions.
- For other internal or external services procured, we use values included in signed agreements, engagement letters or contracts. The assumption is that values will be the same amount where the engagement will be renewed on an ongoing basis. This would include recurrent costs such as audit fees.
- For IT contracts, fixed cost amounts are included in the cash-flow forecast based on original signed contracts. Time and materials costs are based on up-to-date models or current forecasts from the Service Provider, which are assessed by the project managers we have in place for each material project.
- As part of the quarterly reforecast (Lock), we review each cost centre and activity to assess the validity of roles and activities in DCC. This is an exercise to test the validity of all interim roles and activities that are undertaken by each cost centre. The cost centre managers are asked to take a strategic view on future direction of their departments and how it is working

to deliver on DCC's main objectives. This is an exercise to challenge the assumptions and agree on a credible and realistic budget position for each area in DCC.

6. Specified information: supporting questions

This section responds to 6 of 16 of the supporting questions detailed in Section 9.2 to 9.17 of the RIGs guidance document. They are:

1. Definition of baseline (9.7)
2. New Scope project⁶ definitions (9.8)
3. Prudent estimate of Allowed Revenue (9.9)
4. Real Price Effects (9.14)
5. Income Statement (9.16)
6. Approach to materiality (9.17).

6.1. Definition of baseline (9.7)

Please provide a full definition of the requirements that the Licensee considers to be included in its reported and forecast Baseline Internal and External Costs. Please confirm that this definition of requirements has been used to report incurred and forecast Baseline costs in the current year regulatory reporting template.

The definition of the requirements that are included in Baseline Internal and External Costs are unchanged from the previous reporting year.

We can confirm that this definition of requirements has been used to report incurred and forecast Baseline costs in the RY24/25 regulatory reporting template.

6.2. New scope project definitions (9.8)

Please provide definitions and justification for any additional New Scope projects that were added to the reporting template in the current regulatory reporting year. Please explain how the project scope relates to the scope of Baseline activities and existing New Scope projects. Please provide explanations for the New Scope projects' forecast costs.

No New Scope projects were added to the RY24/25 regulatory reporting template.

6.3. Prudent estimate of Allowed Revenue (9.9)

Please detail the uncertainties, activities, assumptions, and any relevant modelling that has informed the prudent estimate of Allowed Revenue for the current reporting year and updated forecasts of Allowed Revenue prudent estimates for future regulatory reporting years. Please describe the steps that the Licensee has taken to manage its prudent estimates of Allowed Revenue efficiently

⁶ 'Project' in this context is not limited to 'Project' as defined in the Licence as work linked to a Baseline Margin Project Performance Adjustment Scheme.

DCC must achieve a balance between raising charges in-year and collecting more cash from customers than required. Reasons why it may need to raise charges in-year may be due to assumptions being incorrect at the time of setting charges or new spend being required at short notice. However, it recognises that this can cause disruption and uncertainty for customers.

The sections below detail the uncertainties, activities, assumptions, any relevant modelling, and the steps taken to manage the prudent estimates of Allowed Revenue efficiently.

6.3.1. Uncertainties

There were significant uncertainties identified in relation to RY24/25 at the time of setting the Charging Statement. These included:

- Changes in assumptions underpinning CH Device Revenue forecasts, including overall volume and SBCH/DBCH order split. This still stays as uncertainty even after the modification to unitary charges.
- The volume of SMETS1 meter migrations.

The uncertainties required DCC to perform analysis of the cost position over the future regulatory years (with their subsequent impact on cash requirements) based on different assumptions. As an ongoing initiative for cost transparency, we share and explain our assessment of the risks and opportunities to the forecast with customers in the Quarterly Finance Fora.

6.3.2. Activities

"The Lock" is Smart DCC's quarterly forecasting process, introduced in RY22/23. It is a simplified governance and approvals process by which any programme, operational and/or functional changes involving activities, financials and resources are identified and updated in Function/Programme business plans and forecasts. The lock process is the overarching governance and performance framework for Smart DCC, it is supported by existing governance structures, but simplified with Exco being the one and only approval forum. The Annual Business Plan (ABP) forms part of the Lock process in Q3.

The management of the prudent estimate of Allowed Revenue is further supported by the following activities to ensure costs are challenged by FBPs and by functional leads to ensure value for money for every pound spent.

- Monthly financial performance review meetings are undertaken by FBPs with budget owners. Costs incurred in the month and year to date are compared to the baseline costs, and explanations are obtained for variances. Budget owners have targets to maintain within their overall baseline and they are challenged on how they will meet these to minimise the risk of over-spend.
- Furthermore, budget owners will also indicate if there are any material costs that they are aware of, but for which a business case is still outstanding. This information is then used in the updated forecast.
- The FBPs work closely with the Commercial team to understand the pipeline of change requests which have been raised, and prepares revised quarterly forecasts accordingly, which include the potential of the impact of material changes. This is compared to the baseline set for External costs. This assessment will inform the strategy adopted in negotiation with Service Providers, approving a change request and agreeing the timing of cash outflow.

- The FBPs engage with Programme Directors and Project Managers for IT services to form the best view of expected costs in the year for contracts which are not fixed price.
- As part of the quarterly reforecasting cycle, we review each cost centre and activity to assess the validity of roles and activities in DCC. The cost centre managers are asked to take a strategic view on future direction of their departments and how it is working to deliver on DCC's main objectives. This is an exercise to challenge the assumptions and agree on a viable budget position for each area in DCC. This process is repeated on a quarterly basis as part of the DCC's move to increased business accuracy.

6.3.3. Forecast modelling and assumptions

Allowed Revenue for any year is first set in the Charging Statement for a particular regulatory year. This prudent estimate of Allowed Revenue is built up from our budgeting and forecasting of cash-flow, resulting in two models: an Internal cost model; and an External cost model. These models are maintained independently and consolidated to provide the total estimated Allowed Revenue, which forms the budget for that Regulatory Year.

Internal costs

Payroll, non-payroll, and recruitment

- For each existing resource, it is assumed that their cost will remain constant, allowing for any salary increases and bonus accruals.
- For new resource, assumptions about the volume and cost are set during the budget process. The number of FTE has been justified and assessed and the cost has been benchmarked by HR.
- Recruitment fees for new resource are assumed at ■■■ per cent, which is in line with the assumption in the LABP and the rate that is charged by Capita Internal Resourcing.
- Car allowance benefit is assumed at ■■■ per cent (capped at £■■■■ which is in line with Capita benefits employees obtain.
- Pension contribution is assumed at an average of ■■■ per cent per FTE, the maximum available being ■■■ per cent.

External and internal services

- Provision of a service for which a longer-term contract is in place with fixed prices is estimated at the price stipulated in the contract and the estimated dates in the contract at which payments will be made, for example, the contracts for SMKI and Parse and Correlate.
- Provision of a service for which a contract is in place with time and materials as the basis is estimated by using an estimate of the number of days to provide the service and the day rates stipulated in the contract, with an additional percentage to allow for expenses. The percentage for expenses can vary depending on the contract. The number of days estimated is informed from previous activity that has been carried out of a similar nature or estimate information received from the Service Provider.
- In some cases, the Service Provider will share forecast models detailing their assumptions of the cost of providing the service over an extended period.
- Where a service has not yet been procured an approximation is made of the cost by the relevant budget owner requiring the service or project manager managing the service. This

estimate may be informed from quotes already received, early estimates from potential suppliers or knowledge and previous experience of a reasonable cost for the service.

Accommodation: below are the assumptions for the London office (Ibex House):

- Rent is [REDACTED]
- Service charge is [REDACTED]
- Rates are [REDACTED]
- Insurance is [REDACTED]

Accommodation: Below are the assumptions for the Manchester office (Brabazon House):

- Rent is [REDACTED]
- Service charge is [REDACTED]
- Insurance is [REDACTED]
- The initial fitout cost has been depreciated over the period of the lease.

External Costs

- The timing, value and profile of cash outflows are assumed to be in line with baseline contracts with FSPs.
- The timing, value, and profile of cash outflows with respect to agreed contract changes are assumed to be in line with details outlined in the Change Authorisation Notes, or in line with details provided directly from the FSPs via the Commercial team.
- Where contract changes have not been approved, the value of the cash outflow is assumed to be in line with the latest Impact Assessment value or if applicable, latest estimates provided by the Commercial team.
- For contract changes where an Impact Assessment is not yet available, a judgement is made to establish a 'rough order of magnitude' for the value of the contract change using information provided from the FSP. Where the FSP provides a range for the 'rough order of magnitude', we use the midpoint as the best estimate.
- Where the FSP cannot provide an early indication as to the magnitude of the change value, we use historic information for similar changes proposed, or values proposed for the same change by other Service Providers as a basis. One or more changes with a similar nature and magnitude are chosen as a benchmark.
- All cost estimates provided by the FSP are challenged robustly by the Supply Chain management team, so we ensure that we obtain value for money and reduce costs wherever possible.
- It is planned that there will be two code releases per year going forward, planned for June and November.

6.3.4. Steps taken to manage prudent estimates of Allowed Revenue efficiently

DCC is entitled to include a 'prudent estimate' line in the Charging Statement up to the end of RY24/25 in accordance with Licence Condition 36.5 to ensure that the Service Charges they apply for in the relevant regulatory year will not need to be amended in the course of that year except in

response to a reasonably unlikely contingency. This requires DCC to consider the risk associated with its costs at the time the Charging Statement is set.

Due to the improvements made in forecasting processes and the improved understanding of uncertainties, this allowed DCC to confirm its Charging Statement for RY24/25 without the need to include a 'prudent estimate' and still remain within the 105% Penalty Interest threshold.

DCC manages its prudent estimate of Allowed Revenue efficiently through the following mechanisms:

- Maintaining a detailed forecast, updated, and reviewed monthly, with comparison to actuals and budget.
- Engaging in a continuous, ongoing process of risk assessment and review with respect to costs incurred against the budget, and expectation of future costs to arise. This allows us to track expenditure in relation to the budget and determine the likelihood of over or under-spend. This exercise is carried out in parallel with the review of our cash-flow forecast, which ensures we have an appropriate level of funds to allow for potential over-spend against the budget.

6.4. Real price effects (9.14)

Please report on the assumptions used to inflate costs over time so as to report the Regulatory Year in nominal terms. This report should include descriptions of how cost centres are inflated over time relative to economy-wide inflation as measured by the retail prices index (RPI). So, for example, if the Licensee's labour costs are indexed to CPI, please report the extent to which those labour costs have risen relative to the previous reporting year and the difference between this increase and RPI.

As is the case in each Regulatory Year, External Costs has been inflated because of the annual indexation set out within the FSP contracts. This is explained in more detail below.

Some Internal Costs have been impacted by inflation (primarily some contracts with external service providers) but the value of this has been immaterial.

This year, Resource Costs were subject to a 3.0 per cent inflationary increase from 1 April 2024.

6.4.1. External Costs

In our FSP contracts, charges for ongoing service are generally subject to annual indexation based on CPI. Principally these include:

- Rate Card - for additional change work
- Testing Services Charges - for UIT support
- Fixed Operational Charges
- Additional support charges for additional capability added to the contracts under change control, e.g. support to new environments
- Transactions Charges
- Network Availability Charges (CSP(N) only)
- Catalogue Services Communication Hubs Asset Charges (CSP's only)
- Comms Hub Maintenance Charges (CSP's only)

The FSP contracts define how indexation should be calculated and to which cost types it is applicable. Indexation can be applied on the anniversary of the signature date of each contract.

Indexation is calculated as:

$$\text{amount or sum} \times \left(\frac{\text{index}_o}{\text{index}_d} \right)$$

Where:

- index_o is the value of CPI published or determined with respect to the period immediately preceding 1 April in each contract year i.e. the year that precedes the year in which the amount or sum falls due.
- index_d is the value of CPI on the commencement date of the contract.

In RY2024/25, the indexation value calculated was the same for each FSP:

$$\left(\frac{133.0}{99.1} \right) = 1.3421$$

- index_o at March 2024 = 133.0
- index_d at signature date in September 2013 = 99.1
- Calculated indexation rate = 34.21 per cent

The way this indexation percentage is applied to each FSP contract is agreed with the FSP as part of the change request.

The impact of indexation on baseline contract values and any changes that had been authorised prior to that date is reflected in the External Costs reported in the RIGs.

6.4.2. Internal Costs - resource costs

Our labour costs are reviewed using RPI as the basis annually. Increase in labour costs due to RPI occurs once a year in April if approved by the Remuneration Committee.

In February 2024, the Remuneration Committee approved an inflationary pay increase of 3.0 per cent for permanent employees, effective from 1 April 2024. Benchmarking increases to salary ranges totalled 3% which is in line with the indexation terms set out in Licence Condition 36.

6.4.3. Baseline Margin indexation

The main RIGs template contains an indexation series which is applied to the BM values to convert between nominal prices (which our application and the subsequent award are measured in) and real 2013/14 prices (which Ofgem uses to compare to the original Licence Award). In December 2023, Ofgem decided to change the DCC BM inflation index from RPI to CPI-H from RY24/25 onwards.

In the draft RIGs published by Ofgem in May 2025, the calculation of this change was applied incorrectly. DCC highlighted this error to Ofgem (including in our June 2025 consultation response). Ofgem had acknowledged this and committed to provide an updated RIGs for this year's submission. Following several discussions, on 25 July 2025, Ofgem shared with us the RIGs to bring this change into effect. Unfortunately, the indexation formula was still not being applied correctly, and we raised

our concerns with Ofgem on 28 July 2025 and then again on 30 July 2025 when the template was eventually corrected to reflect the principle that CPI-H should only apply to new applications from 24/25 onwards and that prior year awards should continue to use the RPI series. However, given we have had to make this change one day before submission (and after our assurance was completed) there is a risk of unintended consequences to other parts of our submission. If any post-submission adjustments are identified as a result of this late change, we expect Ofgem to recognise these.

6.4.4. Income Statement (9.16)

Please explain any variance between Allowed Revenue and amended Regulated Revenue as shown in Sheet 8.

The Regulated Revenue for RY24/25 was £686.452m. The Allowed Revenue (costs) for the same period was £719.888m.

This variance is explained in Sections 3 of this document.

6.4.5. Approach to materiality (9.17)

Please explain how and why DCC has selected materiality thresholds to apply to its cost justifications. Please include an explanation of what proportion of DCC's cost base falls below DCC's materiality thresholds (i.e. how much cost does DCC consider to be "immaterial").

DCC considers it appropriate to focus resource and attention on those key cost justifications where there is material departure from the expected activity and cost outcome, this is to ensure that we can fully articulate the benefits to our customers of significant cost changes and clearly demonstrate value for money. Where activity levels and costs are broadly in line with expected outcomes and there is no material financial variance then we would seek to apply a materiality threshold to ensure our focus and resource was directed to those areas which have more value and relevance for our customers.

DCC considers the appropriateness of the approach to materiality each year to ensure it supports the achievements of the objectives above and on that basis we've decided to maintain our approach at the same thresholds as last year's submission. For Internal Costs, any variance above £0.150m is considered material; for External Costs, any variance above £1.000m is considered material. When considered in aggregate, these thresholds represent 0.52% and 0.91% respectively of the total costs under review.

DCC obligations with respect to materiality

We have not changed our approach to materiality compared to last years' submission. For Internal Costs, any variance above £0.150m is considered material; for External Costs, any variance above £1.000m is considered material.

6.4.6. How much of our cost is 'immaterial'?

External Costs

0.91 per cent of the External Costs incurred in RY24/25 are considered immaterial. This is set out below.

External Service Provider	Baseline - set-up costs	Baseline - operational costs	Baseline - performance related refunds	New scope	Total
DSP					
CSP - North					
CSP - Central					
CSP - South					
S1SP_1					
S1_CSP_1					
S1SP_2					
S1_CSP_2					
S1SP_3a					
S1SP_3b					
S1_DCOa					
S1_DCOb					
ECoS hosting and managed service					
ECoS application build					
S1_DCOc					
TAF					
CN&N CI					
CH&N Device Manager					
CH&N CH					
CH&N WAN					
CH&N integration assurance					
Total					

Table 5 – Immaterial External Cost variance, RY24/25 (£m)

Internal Costs

0.52 per cent of the Internal Costs variance is considered immaterial. This is set out in the table below:

	C. Mgt	Commercial	D&A	Finance	Industry	Ops	Prog	Security	SMETS1	Network Evo	ECoS	MHHS	Virtual WAN	Future Connectivity	Total
PR															
NP															
RC															
AC															
ES															
IS															
SM															
TR															
IT															
OS															
Tot al															

Table 6 – Immaterial Internal Cost variance, RY24/25 (£m)⁷

7. Penalty Interest

In accordance with the formula included in Ofgem’s final decision on the DCC penalty interest rate, we have calculated the proportion of Regulated Revenue to Allowed Revenue as:

Regulated Revenue (£m)	686.452
Allowed Revenue (£m)	719.888
Difference (£m)	-33.435
Proportion (%)	95%
Threshold (%)	105%

Table 7 – Penalty interest, RY24/25 (£m)

As the proportion is within the threshold, no further explanation is required.

⁷ Values are shown to 3d.p. Therefore, any value greater than zero but less than £1,000 will appear as 0.000.