

Tom Causebrook
Access Contract Manager (Track)
Monument Place
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Aaren Healy
Network Rail
1 Eversholt St
London
NW1 2DN

11th October 2016

RE: Proposed Rule Change to Traction Electricity Rules and Schedule 7 in order to accommodate Partial Fleet Metering

Dear Aaren,

Thank you for consulting Govia Thameslink Railway (GTR) of the proposals to make changes to the Traction Electricity Rules and Schedule 7 of the Track Access Contract to accommodate Partial Fleet Metering (PFM). This letter is GTR's response to the proposals. Please see below our comments on the four proposals that were outlined in the letter and supporting documentation of the 8th September 2016.

Proposal one: Provisions in the Traction Electricity Rules to accommodate Partial Fleet Metering.

It is GTR's understanding that the proposed provisions will only impact operators who opt-in to PFM and that the provisions will not have any impact on an operator whose electricity traction usage is billed either by metering or modelled rates. It is also understood by GTR that an operator that is billed via metering or modelled rates will not be impacted by another operator opting in to PFM. As the majority of the GTR train fleet is metered we do not have any plans to opt in to PFM.

Subject to our understanding above being correct then we do not have any objections to the proposed PFM provisions being added to the Traction Electricity Rules. Could it please be confirmed GTR's understanding is correct?

Proposal two: Amendments to Schedule 7 of an operators track access contract to accommodate Partial Fleet Metering.

It is GTR's understanding that the 'Model PFM Provisions' would only be added to the Track Access Agreement if requested by an operator. As GTR does not have any plans to adopt PFM then we would not envisage needing to add the new provision to our contract. However if in the future GTR did adopt PFM it is our understanding that we could request that the provisions are added and that there is no set deadline for doing this. Could it please be confirmed that GTR's understanding is correct?

Govia Thameslink Railway

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Proposal three: No further consultation on Model PFM Provisions.

GTR has no objections to the proposal that an industry consultation will not be undertaken when Network Rail agrees to an operator opting in to PFM and there are no departures from the standard model PFM provisions.

Proposal four: Re-ordering the Traction Electricity Rules.

GTR does not have any objections to the proposal to reorder the Traction Electricity Rules as set out in the draft version sent on the 8th September 2016.

Thank you once again for consulting GTR on this matter.

Your sincerely



Tom Causebrook
Access Contracts Manager (Track)