



Aaren Healy  
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Dear Aaren

### **Network Rail Proposed Rules Change to Traction Electricity Rules - Partial Fleet Metering**

Thank you for the opportunity to respond to Network Rail's consultation on the proposed change to the Traction Electricity Rules (TERs) to reflect Partial Fleet Metering (PFM).

London & South Eastern Railway Limited (trading as Southeastern), having undertaken traction energy meter fitment to part of its fleet of trains, is a possible future beneficiary of the proposed rules change to the TERs that will enable PFM. And as such, we have been involved in the development of the proposed drafting with colleagues from other TOCs with similar close interests in PFM and have overseen this work as members of the Rail Delivery Group led Traction Energy Steering Group.

We have carefully considered the proposed drafting to amend the Traction Electricity Rules to reflect PFM billing and the proposed wording for incorporation to PFM Operators' Track Access Contracts in Schedule 7.

We note the amendments to the Track Access Contracts must be approved by ORR via a Railways Act Section 22 amendment but caution that future operators could feasibly enter into terms different to those as set out in your proposals.

However, Southeastern accepts the risk is minimal in this respect. This does not deter us from supporting PFM as it represents substantial cost savings against metering our whole fleet of trains as well as providing a reliable method of analysing energy consumption that can help drive energy efficiencies.

We would also want Network Rail to note that this letter in support of PFM is in relation to the proposed rules change to the TERs only to reflect PFM terms and should not constitute a



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declaration to opt the Southeastern fleet into the terms of Partial Fleet Metering nor acceptance, at the present time that the amendments required should be made to its Track Access Contract with Network Rail.

If you have any questions in relation to our response, please contact me.

Kind regards



Stuart Freer  
Relationship Manager



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