

Ekta Sareen
Senior Regulatory Economist
Network Rail
King's Place
90 York Way
London N1 9AG

Hertford House
1 Cranwood Street
London EC1V 9QS

6th December 2012

Dear Ekta,

First Capital Connect (FCC), First ScotRail (FSR) and First TransPennine Express (FTPE) response on Network Rail consultation on charging of losses and regenerative braking for metered operators on the DC network

FCC is pleased to respond on behalf of ourselves, FSR and FTPE to Network Rail's consultation on charging of losses and regenerative braking for metered operators on the DC network in CP5. The response you will have received from ATOC is fully supported and this document is intended to emphasise the issues of especial concern to us.

FCC sees how the work undertaken indicates losses of 15.57% for ESTA U and 10.26% for ESTA M (Merseyside) - the key is what inferences should be drawn for the CP5 charges.

- Since we understand that West Coast has found their load from stabled and stationary trains to be over 12% of their consumption we feel this seems to be a significantly inaccurate assumption to assume it to be insignificant.
- We also suspect that there is a significant seasonal increase in such consumption.
- Air conditioning also presents a significant load where it is fitted and since we understand that losses rise by the *square* of increases it is material to the interpretation of the 15.57% figure for ESTA U that the degree to which the data does or does not relate to air conditioned vehicles is clear. The vehicles operated in the Merseyside ESTA are not, of course, air conditioned. However, replacement is probable during CP5.
- To extrapolate previous growth to make a 1% prediction for the next five years – given the planned extensions to the electrified network during the Control Period – is too crude. We believe it is essential to make an assumption about the number of track miles to be electrified under Strategic Business Plan/HLOS and apply this to what is known about the changes of losses with vehicle miles. Similarly, since we believe incremental changes in the magnitude of transmission losses will be highly dependent on parallel supply capacity changes the investments planned for CP5 need to be assumed and factored in. To protect operators against the consequences it is also essential that any power supply changes remain a Network Change issue.

We also believe that to equate the DC portions of otherwise AC ESTAs with ESTA U is not necessarily sensible and the action to be taken in each case sense checked with the local circumstances. Certainly, in the case of the East Coast Main Line South ESTA (U); (Drayton Park-Moorgate) should be extrapolated from the Merseyside ESTA (M) data rather than the South (U) ESTA - since a simple tube branch must have more in common with the compact Merseyside network rather than the latter.

FCC, FSR and FTPE look forward to working with you to develop the CP5 charging structure.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'John Beer', with a long horizontal flourish extending to the right.

John Beer
Head of Access Contracts