

2021/22 TAX REPORT

Transmission & Distribution RP6 Price Control

20 December 2024



Contents

1. LICENCE REQUIREMENT	2
2. TRANSMISSION TAX ENTITLEMENT	3
3. DISTRIBUTION TAX ENTITLEMENT	7
4. COMPARISON OF TAX ENTITLEMENT TO STATUTORY TAX	11
5. ANALYSIS OF CAPITAL ADDITIONS IN TAX RETURNS	13
6. RECONCILIATION OF REGULATORY CAPITAL ALLOWANCES TO STATUTORY TAX RETURNS	15
7. RETROSPECTIVE ADJUSTMENTS	16

1. LICENCE REQUIREMENT

Paragraph 12.35 of Annex 2 of Northern Ireland Electricity Ltd's Electricity Distribution and Participate in Transmission Licences requires NIE Networks to furnish the Utility Regulator with an annual tax report which sets out the following:

- a) audited tax reports that enables a full reconciliation between:
 - i. information submitted to HMRC on the Licensee's tax affairs; and
 - ii. Information used for the calculation of the tax element of the Licensee's Maximum Regulated Distribution / Transmission Revenue, as calculated at paragraph 9 of Annex 2 of the Licences;
- b) information submitted to HMRC on the Licensee's tax affairs;
- c) information used for the calculation of the tax element of the Licensee's Maximum Regulated Distribution / Transmission Revenue, as calculated at paragraph 9 of Annex 2 of the Licences; and
- d) any retrospective adjustments in respect of previous years together with any restatement of 12.35 (a), 12.35 (b) and 12.35 (c).

This audited report has been designed to fulfil this licence requirement. Sections 2 to 6 address the requirements of Paragraphs 12.35 (a), 12.35 (b) and 12.35 (c) and Section 7 addresses the requirement of Paragraph 12.35 (d).

The Licence requirements above are effective for the RP6 price control period. The RP6 price control (including the extension year) spans seven and a half years from October 2017 to March 2025.

Note that all figures in this report are in nominal prices.

2. TRANSMISSION TAX ENTITLEMENT

2021/22 Tax calculation

The following paragraphs set out the calculation of the tax amount included within Transmission Entitlement for the regulatory reporting year 2021/22.

Tax Amount – TAX_t

The maximum regulated transmission revenue for NIE Networks is set out in Paragraph 3.5 of Annex 2 of the Transmission Licence. This formula is as follows:

$$RP6R_t = DEP_t + RET_t + BD_t + O_t + P_t + TAX_t + K_t$$

TAX_t is one of the components of allowed revenue and is calculated in accordance with the following formula set out in Paragraph 9.1 of Annex 2:

$$TAX_t = TR_t / (1 - TR_t) * (RET_t + DEP_t - INT_t - CA_t)$$

Tax Rate – TR_t

TR_t represents the corporation tax rate applicable in Northern Ireland as specified by HMRC which in 2021/22 is 19%. The tax factor TR_t / (1 – TR_t) is therefore 23.5%.

Return Amount – RET_t

RET_t represents the return on the Regulatory Asset Base (RAB). It is calculated by taking the average value of the opening (ORAB_{X_t}) and closing (CRAB_{X_t}) values of the individual RABs and multiplying them by the adjusted vanilla weighted average cost of capital (AVWACC_t). The formula for calculating RET_t is set out in Paragraph 5.1 of Annex 2:

$$RET_t = \left(\sum_{\text{All RAB}_X} (ORAB_{X_t} + CRAB_{X_t}) / 2 \right) * AVWACC_t$$

In 2021/22 the average value of all Transmission RABs is £385m and the adjusted vanilla WACC is 3.218%. The RET_t value for 2021/22 is therefore **£12.379m**.

Depreciation amount – DEP_t

DEP_t represents the depreciation amount and is calculated in accordance with the formula set out in Paragraph 4.43 of Annex 2:

$$DEP_t = \sum_{\text{All RAB}_X} (DEPADD_{X_t} + FDEP_{X_t})$$

DEPADD_{X_t} represents the depreciation amount for capex incurred on network assets from 1 October 2017 onwards.

FDEP_{X_t} represents the depreciation amount of capex incurred on network assets prior to 30 September 2017.

The DEP_t value for 2021/22 is **£18.838m**.

Interest amount – INT_t

INT_t means an amount equal to the interest on the value of the average of all Transmission RABs calculated in accordance with the following formula set out in Paragraph 9.1 of Annex 2:

$$INT_t = \left(\sum_{\text{All RAB}_X} (ORAB_{X_t} + CRAB_{X_t}) / 2 \right) * G * NCOD$$

Where: G represents notional gearing and has a value of 45%

NCOD represents a notional nominal cost of debt with a value of 5.19%.

In 2021/22 the average value of all Transmission RABs is £385m which equates to an INT_t figure of **£8.986m**.

Regulatory capital allowances – CA_t

CA_t represents the value of capital allowances calculated in accordance with guidelines published by HMRC. There are three main groupings or ‘pools’ used in the calculation of capital allowances; a) a long-life asset pool, b) a general pool and c) a deferred revenue pool. There are three pools because different types of assets attract different capital allowance percentages.

Each pool is classed as follows:

Capital Allowance Pool	Useful economic life	Capital allowance rate for 2021/22	Comments
Long-life asset pool	25 years or greater	6% reducing balance	This includes transmission and renewables 40-year capex and tree cutting capex.
General pool	Less than 25 years	18% reducing balance	This includes non-network IT capex.
Deferred revenue pool	N/A	2.5% straight line	This represents the proportion of capital expenditure which is classified as non-load related expenditure where we are replacing worn assets on a like-for-like basis or the nearest modern equivalent basis

The classification of capital expenditure for tax purposes across various tax pools is determined by tax legislation and HMRC working agreements.

CA_t is calculated by taking the opening written down value of the various capital allowance pools for the relevant year. Capital additions are then added to the opening value to give a total value on which capital allowances can be claimed for that year. The capital allowance figure is then deducted to give the closing written down value (WDV) which becomes the opening value for the next year.

The opening WDV's for 2021/22 are set out in Table 4 of the 2020/21 Tax Report and shown in Table 1 below.

Table 1: 2021/22 Opening Written Down Values

Pool	£m
Long-life asset pool	144.185
General pool	1.611
Deferred revenue pool	41.927
Cumulative additions for Deferred Revenue Pool	54.113

Regulatory Capex Additions

Transmission 2021/22 statutory capex additions, as shown in the Financial Data RIGs, are £49.530m. Regulatory capex additions are £37.949m which includes a capex incentive adjustment of £0.237m. The reconciliation of Transmission statutory capex additions to regulatory capex additions is shown in Table 2 below.

Table 2: Reconciliation of Statutory Capex to Regulatory Capex

Ref	Description	£m
A	Gross statutory Capex per “Rec 2 – Capex” of Financial Data RIGs	49.530
	Items included in Regulatory Capex but not in Statutory Capex	
B	Customer Contributions - Approved Generation Cluster Infrastructure	(8.133)
	Items included in Statutory Capex but not included in Regulatory capex	
C	Connection expenditure: Various other Connections categories	(3.686)
D	Total Regulatory Capex Additions	37.711
E	Capex Incentive Adjustment	<u>0.237</u>
F	Total Regulatory Additions (Including Capex Incentive)	37.949

The total Regulatory additions figure above is then adjusted for non qualifying capex items of £0.244m to give capital additions eligible for capital allowances of £37.705m. This is then split across the three tax pools, as shown in Table 3 below, in line with HMRC guidance.

Table 3: Allocation of Additions by Capital Allowance Pool

Ref	Description	Long-Life Asset Pool	General Pool	Deferred Revenue Pool	Total
		£m	£m	£m	£m
A	Regulatory Additions	34.248	0.549	2.915	37.711
B	Capex Incentive Adjustment	0.432	(0.195)	-	0.237
C	Adjustment for Non-Qualifying Capex	<u>(0.244)</u>	=	=	<u>(0.244)</u>
D	Total Additions for TAX_i Capital Allowances	34.436	0.354	2.915	37.705

These capex additions are then added to the opening WDV and capital allowances are calculated. Table 4 sets out the capital allowances used in the calculation of regulated revenue entitlement for 2021/22.

Table 4: 2021/22 Capital Allowance Calculation

Description	Long-Life Asset Pool	General Pool	Deferred Revenue Pool	Total
	£m	£m	£m	£m
Opening WDV @ 01/04/2021	144.185	1.611	41.927	187.723
Additions (Per Table 3)	<u>34.436</u>	<u>0.354</u>	<u>2.915</u>	<u>37.705</u>
Adjusted WDV	178.621	1.965	44.842	225.428
Capital Allowances	<u>(10.717)</u>	<u>(0.354)</u>	<u>(1.426)</u>	<u>(12.497)</u>
Closing WDV @ 31/03/2022	167.904	1.611	43.416	212.931
Capital Allowance Rate	6% Reducing Balance	18% Reducing Balance	2.5% Straight Line	
Deferred Revenue Pool				
Cumulative Additions to 01/04/2021			54.113	
Additions			<u>2.915</u>	
Cumulative Additions to 31/03/2022			<u>57.028</u>	
Capital Allowances			1.426	

The CA_t amount for 2021/22 is **£12.497m**.

Calculation of TAX_t

When the various components of TAX_t are inserted into the licence formula, the value of TAX_t for 2021/22 is **£2.284m** as detailed in Table 5 below.

$$TAX_t = TR_t / (1 - TR_t) * (RET_t + DEP_t - INT_t - CA_t)$$

Table 5: Calculation of TAX_t

Formula	£m
Return on RAB – RET _t	12.379
RAB Depreciation – DEP _t	18.838
Less Interest – INT _t	(8.986)
Less Capital Allowances – CA _t	<u>(12.497)</u>
	9.735
Tax Factor – TR _t / (1 - TR _t)	23.5%
Tax Entitlement – TAX_t	2.284

3. DISTRIBUTION TAX ENTITLEMENT

2021/22 Tax calculation

The following paragraphs set out the calculation of the tax amount included within Distribution Entitlement for the regulatory reporting year 2021/22.

Tax Amount – TAX_t

The maximum regulated distribution revenue for NIE Networks is set out in Paragraph 3.5 of Annex 2 of the Distribution Licence. This formula is as follows:

$$RP6R_t = DEP_t + RET_t + BD_t + RI_t + O_t + P_t + TAX_t - RPSI_t + K_t$$

TAX_t is one of the components of allowed revenue and is calculated in accordance with the following formula set out in Paragraph 9.1 of Annex 2:

$$TAX_t = TR_t / (1 - TR_t) * (RET_t + DEP_t - INT_t - CA_t)$$

Tax Rate – TR_t

TR_t represents the corporation tax rate applicable in Northern Ireland as specified by HMRC which in 2021/22 is 19%. The tax factor TR_t / (1 – TR_t) is therefore 23.5%.

Return Amount – RET_t

RET_t represents the return on the Regulatory Asset Base (RAB). It is calculated by taking the average value of the opening (ORAB_{X_t}) and closing (CRAB_{X_t}) values of the individual RABs and multiplying them by the adjusted vanilla weighted average cost of capital (AVWACC_t). The formula for calculating RET_t is set out in Paragraph 5.1 of Annex 2:

$$RET_t = \left(\sum_{All\ RAB_X} (ORAB_{X_t} + CRAB_{X_t}) / 2 \right) * AVWACC_t$$

In 2021/22 the average value of all Distribution RABs is £1,357m and the adjusted vanilla WACC is 3.218%. The RET_t value for 2021/22 is therefore **£43.675m**.

Depreciation amount – DEP_t

DEP_t represents the depreciation amount and is calculated in accordance with the formula set out in Paragraph 4.60 of Annex 2:

$$DEP_t = \sum_{All\ RAB_X} (DEPADD_{X_t} + FDEP_{X_t})$$

DEPADD_{X_t} represents the depreciation amount for capex incurred on network assets from 1 October 2017 onwards.

FDEP_{X_t} represents the depreciation amount of capex incurred on network assets prior to 30 September 2017.

The DEP_t value for 2021/22 is **£87.730m**.

Interest amount – INT_t

INT_t means an amount equal to the interest on the value of the average of all Distribution RABs calculated in accordance with the following formula set out in Paragraph 9.1 of Annex 2:

$$INT_t = \left(\sum_{\text{All RAB}_X} (ORAB_X_t + CRAB_X_t) / 2 \right) * G * NCOD$$

Where: G represents notional gearing and has a value of 45%

NCOD represents a notional nominal cost of debt with a value of 5.19%.

In 2021/22 the average value of all Distribution RABs is £1,357m which equates to an INT_t figure of **£31.703m**.

Regulatory capital allowances – CA_t

CA_t represents the value of capital allowances calculated in accordance with guidelines published by HMRC. There are three main groupings or ‘pools’ used in the calculation of capital allowances; a) a long-life asset pool, b) a general pool and c) a deferred revenue pool. There are three pools because different types of assets attract different capital allowance percentages.

Each pool is classed as follows:

Capital Allowance Pool	Useful economic life	Capital allowance rate for 2021/22	Comments
Long-life asset pool	25 years or greater	6% reducing balance	This includes distribution 40-year capex, tree cutting capex and domestic contributions.
General pool	Less than 25 years	18% reducing balance	This includes metering, market opening and IT capex.
Deferred revenue pool	N/A	2.5% straight line	This represents the proportion of capital expenditure which is classified as non-load related expenditure where we are replacing worn assets on a like-for-like basis or the nearest modern equivalent basis

The classification of capital expenditure for tax purposes across various tax pools is determined by tax legislation and HMRC working agreements.

CA_t is calculated by taking the opening written down value of the various capital allowance pools for the relevant year. Capital additions are then added to the opening value to give a total value on which capital allowances can be claimed for that year. The capital allowance figure is then deducted to give the closing written down value (WDV) which becomes the opening value for the next year.

The opening WDV for 2021/22 are set out in Table 4 of the 2020/21 Tax Report and shown in Table 6 below.

Table 6: 2021/22 Opening Written Down Values

Pool	£m
Long life asset pool	450.039
General pool	64.459
Deferred revenue pool	256.395
Cumulative additions for Deferred Revenue Pool	321.329

Regulatory Capex additions

Distribution statutory capex additions in 2021/22, as detailed in the Financial Data RIGs, are £124.084m. Regulatory capex additions are £96.831m which includes a capex incentive adjustment of £3.474m. The reconciliation of Distribution statutory capex additions to regulatory capex additions is shown in Table 77 below.

Table 7: Reconciliation of Statutory Capex to Regulatory Capex

Ref	Description	£m
A	Gross Statutory Capex per “Rec 2 – Capex” of Financial Data RIGs	124.084
	Items included in Regulatory Capex but not in Statutory Capex	
B	Customer Contributions - Housing sites with 12 or more Domestic Premises	(4.864)
	Items in Statutory Capex additions but not included in Regulatory Additions	
C	Connection expenditure: Various other Connections categories	<u>(25.862)</u>
D	Total Regulatory Capex Additions	93.358
E	Capex Incentive Adjustment	<u>3.474</u>
F	Total Regulatory Additions (Including Capex Incentive)	96.831

The total Regulatory additions figure above is then adjusted for non qualifying capex of £2.194m to give additions that are eligible for capital allowances of £94.638m. This is then split across the three tax pools, as shown in Table 8, in line with HMRC guidance.

Table 8: Allocation of Additions by Capital Allowance Pool

Ref	Description	Long-Life Asset Pool	General Pool	Deferred Revenue Pool	Total
		£m	£m	£m	£m
A	Regulatory Additions	54.837	17.146	21.375	93.358
B	Capex Incentive Adjustment	3.972	(0.498)	-	3.474
C	Asset Disposals	-	-	-	-
D	Non-Qualifying Capex	<u>(2.194)</u>	±	±	<u>(2.194)</u>
E	Total Additions for TAX_t Capital Allowances	56.614	16.648	21.375	94.638

The capex additions are then added to the opening WDV and capital allowances are calculated. Table 9 below sets out the capital allowances used in the calculation of regulated revenue entitlement for 2021/22.

Table 9: 2021/22 Capital Allowance Calculation

Description	Long-Life Asset Pool	General Pool	Deferred Revenue Pool	Total
	£m	£m	£m	£m
Opening WDV @ 01/04/2021	450.039	64.459	256.395	770.893
Additions (Table 8)	<u>56.614</u>	<u>16.648</u>	<u>21.375</u>	<u>94.638</u>
Adjusted WDV	506.653	81.107	277.770	865.531
Capital Allowances	<u>(30.399)</u>	<u>(14.599)</u>	<u>(8.568)</u>	<u>(53.566)</u>
Closing WDV @ 31/03/2022	476.254	66.508	269.203	811.964
Capital Allowance Rate	6% Reducing Balance	18% Reducing Balance	2.5% Straight Line	
Deferred Revenue Pool				
Cumulative Additions to 01/04/2021			321.329	
Additions			<u>21.375</u>	
Cumulative Additions to 31/03/2022			<u>342.704</u>	
Capital Allowances			8.568	

The CA_t amount for 2021/22 is **£53.566m**.

Calculation of TAX_t

When the various components of TAX_t are inserted into the licence formula, the value of TAX_t for 2021/22 is **£10.822m** as detailed in Table 10 below.

$$TAX_t = TR_t / (1 - TR_t) * (RET_t + DEP_t - INT_t - CA_t)$$

Table 10: Calculation of TAX_t

Formula	£m
Return on RAB – RET _t	43.675
RAB Depreciation – DEP _t	87.730
Less Interest – INT _t	(31.703)
Less Capital Allowances – CA _t	<u>(53.566)</u>
	46.137
Tax Factor – TR _t / (1 - TR _t)	<u>23.5%</u>
Tax Entitlement – TAX_t	10.822

4. COMPARISON OF TAX ENTITLEMENT TO STATUTORY TAX

NIE Networks submits statutory tax returns to HMRC in line with its statutory year end which is on a calendar year basis. For the regulatory period 2021/22, consideration needs to be given to the tax returns filed by NIE Networks for both calendar years 2021 and 2022.

Table 11 below shows the comparison of Tax Entitlement calculated above and statutory tax paid. As the information contained within the tax returns does not specify between Transmission and Distribution the entitlement amount is collated into a combined Transmission and Distribution view.

Table 11: Comparison of Tax Entitlement and Tax Paid for RP6

Period	Oct 17 – Mar 18	Apr 18 – Mar 19	Apr 19 – Mar 20	Apr 20 – Mar 21	Apr 21 – Mar 22	Total
	£m	£m	£m	£m	£m	£m
Tax Entitlement – TAX _t - Transmission (Table 5) ¹	0.689	1.421	2.207	2.238	2.284	8.839
Tax Entitlement – TAX _t - Distribution (Table 10) ¹	<u>3.763</u>	<u>7.081</u>	<u>9.417</u>	<u>9.651</u>	<u>10.822</u>	<u>40.734</u>
Total Tax Entitlement	4.452	8.502	11.624	11.889	13.106	49.573
Tax amount per Tax computation	<u>7.914</u>	<u>9.275</u>	<u>14.798</u>	<u>12.311</u>	<u>11.860</u>	<u>56.158</u>
Variance	(3.462)	(0.773)	(3.174)	(0.422)	1.246	(6.585)

The total variance for the period Oct 2017 to Mar 2022 above is explained in Table 12 below.

Table 12: Reconciliation of Tax Entitlement to Statutory Tax for RP6

Period	Oct 17 – Mar 22	Comment
	£m	£m
Capital Allowances	1.118	At 1 April 2017 the opening pool figure for capital allowances was similar in the Regulatory Entitlement model and the statutory tax pool. However, in the regulatory model, the general pool was lower which has resulted in lower capital allowances which means a higher tax entitlement allowance than the statutory tax paid. This has been offset by the long-life pool being higher in the regulatory model. The differences have arisen due to the differences in the treatment of capital additions as detailed in Sections 5 and 6 of this and previous reports.
Pension Deficit	2.050	Difference due to the ERDC disallowance of Pension deficit contributions.
Income / Opex Differences	(4.988)	This mainly relates to timing differences between actual income received and regulatory entitlement.
Interest Amount	(1.379)	Differences between notional interest in the tax entitlement calculation and actual interest paid.
Reliability Incentive	(2.342)	Entitlement for the Reliability incentive is not included within the tax entitlement calculation.
Other	(1.045)	Relates to other minor adjustments within the tax return.
Variance	(6.585)	

¹ Relates to Tables 5 and 10 from the specific year's Tax Report.

There is a seasonality to the Distribution element of NIE Networks income. This impacts the analysis above as the regulatory year 2017/18 crosses two price control periods. **Table 13** and **Table 14** show the comparison of Tax Entitlement calculated above and statutory tax paid including the full regulatory year Apr 17 – Mar 2018.

Table 13: Comparison of Tax Entitlement and Tax Paid (including full year 2017/18)

Period	Apr 17 – Mar 18	Apr 18 – Mar 19	Apr 19 – Mar 20	Apr 20 – Mar 21	Apr 21 – Mar 22	Total
	£m	£m	£m	£m	£m	£m
Tax Entitlement – TAX _t - Transmission (Table 11) ²	1.241	1.421	2.207	2.238	2.284	9.391
Tax Entitlement – TAX _t - Distribution (Table 11) ²	<u>7.010</u>	<u>7.081</u>	<u>9.417</u>	<u>9.651</u>	<u>10.822</u>	<u>43.981</u>
Total Tax Entitlement	8.251	8.502	11.624	11.889	13.106	53.371
Tax amount per Tax computation	<u>6.946</u>	<u>9.275</u>	<u>14.798</u>	<u>12.311</u>	<u>11.860</u>	<u>55.190</u>
Variance	1.304	(0.773)	(3.174)	(0.422)	1.246	(1.819)

Table 14: Reconciliation of Tax Entitlement to Statutory Tax (including full year 2017/18)

Period	Apr 17 – Mar 22
	£m
Capital Allowances	1.025
Pension Deficit	2.233
Income / Opex Differences	0.256
Interest Amount	(1.773)
Reliability Incentive	<u>(2.342)</u>
Other	<u>(1.219)</u>
Variance	(1.819)

² Refer to Table 13 of Oct 17 – Mar 18 report for Apr 17 – Mar 18 figures

5. ANALYSIS OF CAPITAL ADDITIONS IN TAX RETURNS

The capital additions eligible for capital allowances and the analysis across the various pools in the submitted tax returns are shown in Table 15 and Table 16 below.

Table 15: Analysis of Capital Additions in 2021 Tax Return

Ref	A	B	C
Period	Jan – Mar 21	Apr – Dec 21	Jan – Dec 21
Gross Additions	£m	£m	£m
Total Capex Additions per Tax Returns	34.814	130.922	165.737
Less: Total Customer Capital Contributions	(7.736)	(31.177)	(38.913)
Total Net Capex Additions	27.079	99.745	126.824
Add: Domestic Capital Contributions	<u>1.889</u>	<u>5.739</u>	<u>7.628</u>
Total Net Additions eligible for Capital Allowances	28.967	105.484	134.451
Analysis for tax purposes			
Long Life Asset Pool	18.536	70.529	89.064
General Pool	3.807	15.080	18.887
Deferred Revenue Pool	6.050	18.150	24.200
Non-Qualifying Capex	<u>0.575</u>	<u>1.725</u>	<u>2.300</u>
Total	28.967	105.484	134.451

Table 16: Analysis of Capital Additions in 2022 Tax Return

Ref	D	E	F
Period	Jan – Mar 22	Apr – Dec 22	Jan – Dec 22
Gross Additions	£m	£m	£m
Total Capex Additions per Tax Returns	42.692	143.981	186.673
Less: Total Customer Capital Contributions	(9.557)	(23.407)	(32.963)
Total Net Capex Additions	33.135	120.574	153.709
Add: Domestic Capital Contributions	<u>2.164</u>	<u>6.491</u>	<u>8.655</u>
Total Net Additions eligible for Capital Allowances	35.299	127.065	162.364
Analysis for tax purposes			
Long Life Asset Pool	24.238	92.952	117.190
General Pool	4.208	13.556	17.764
Deferred Revenue Pool	6.140	18.420	24.560
Non-Qualifying Capex	<u>0.713</u>	<u>2.138</u>	<u>2.850</u>
Total	35.299	127.065	162.364

The information in Table 15 for the 9 month period Apr – Dec 21 and Table 16 for the 3 month period Jan – Mar 2022 is combined to show the analysis of the Regulatory period 2021/22 in Table 17.

Table 17: Analysis of 2021/22 per tax returns

Ref Period	Table 15 – B Apr – Dec 21	Table 16 – D Jan – Mar 22	G Apr – Mar 22
Gross Additions	£m	£m	£m
Total Capex Additions per Tax Returns	130.922	42.692	173.614
Less: Total Customer Capital Contributions	(31.177)	(9.557)	(40.734)
Total Net Capex Additions	99.745	33.135	132.880
Add: Domestic Capital Contributions	<u>5.739</u>	<u>2.164</u>	<u>7.902</u>
Total Net Additions eligible for Capital Allowances	105.484	35.299	140.783
Analysis for tax purposes			
Long Life Asset Pool	70.529	24.238	94.767
General Pool	15.080	4.208	19.289
Deferred Revenue Pool	18.150	6.140	24.290
Non-Qualifying Capex	<u>1.725</u>	<u>0.713</u>	<u>2.438</u>
Total	105.484	35.299	140.783

6. RECONCILIATION OF REGULATORY CAPITAL ALLOWANCES TO STATUTORY TAX RETURNS

The information contained within the tax returns does not specify between Transmission and Distribution. Therefore, in order to reconcile the regulatory amounts to the tax returns the amounts need to be collated in a combined Transmission and Distribution view shown in Table 18 below.

Table 18: Total Regulatory additions split by Capital Allowance pool

Description	Long-Life Asset Pool	General Pool	Deferred Revenue Pool	Total
	£m	£m	£m	£m
Transmission (Table 3)	34.436	0.354	2.915	37.705
Distribution (Table 8)	<u>56.614</u>	<u>16.648</u>	<u>21.375</u>	<u>94.638</u>
Total Regulatory Additions	91.050	17.002	24.290	132.342

Table 19 provides a reconciliation of capital additions in each pool shown in the tax return (Table 17 – Column G) with the additions used in the calculation of regulatory entitlement for 2021/22 as set out in Table 18.

Table 19: Reconciliation of Additions in Tax return to Regulatory Capital Allowances Pools

Description	Long-Life Asset Pool	General Pool	Deferred Revenue Pool	Total
	£m	£m	£m	£m
Capex per Tax Return (Table 17 - G)	94.767	19.289	24.290	138.345
Transmission Capex Incentive Adjustment (The total Regulatory additions figure above is then adjusted for non qualifying capex items of £0.244m to give capital additions eligible for capital allowances of £37.705m. This is then split across the three tax pools, as shown in Table 3 below, in line with HMRC guidance. Table 3 – B)	0.432	(0.195)	-	0.237
Distribution Capex Incentive Adjustment (Table 8 – B)	3.972	(0.498)	-	3.474
Less Domestic Contributions (Table 17 - G)	(7.902)	-	-	(7.902)
Less Connection expenditure (Non-price control) (Table 2 – C & Table 7 – C)	(27.954)	(1.594)	-	(29.548)
Add Connection income (Non-price control) (Table 17 - G less Table 2 – B & Table 7 – B)	27.737	-	-	27.737
Regulatory Additions	91.050	17.002	24.290	132.342

7. RETROSPECTIVE ADJUSTMENTS

With reference to Paragraph 12.35 (d) of Annex 2 of the Licences, there are no retrospective adjustments in respect of previous years and no restatement of 12.35 (a), 12.35 (b) and 12.35 (c) is required.

Independent Non-Statutory Auditor Report to the directors of Northern Ireland Electricity Networks Limited (the Company) and Utility Regulator (the Regulator)

Non-statutory audit of regulatory tax reports in accordance with Paragraph 12.35 of Annex 2 of Northern Ireland Electricity Distribution and Participate in Transmission Licences (the Licences) for RP6 covering the period 1 April 2020 to 31 March 2022.

Introduction

This report is produced in accordance with the terms of our engagement letter with the Company dated 14 January 2021.

Background

This report is made in order to meet the requirements of Paragraph 12.35 of Annex 2 of the Company's Regulatory Licences. Our review work has been undertaken to (a) assist the Company to meet its obligation under the Regulatory Licences to procure such a report and to (b) facilitate the carrying out by the Regulator of its regulatory functions, and for no other purpose. We do not accept or assume responsibility to anyone other than the Company and the Regulator, for our review work, for this report or for the opinions we have formed. We understand that the format and content of the tax report has been agreed with the Regulator.

For clarification, the statutory tax returns are filed on a calendar year basis and the Company's Maximum Regulated Revenue is calculated on the regulatory year April – March. The information within the tax returns is converted into regulatory periods which can cause timing differences.

Scope of work

We draw your attention to the fact that the engagement is to review the reconciliation of the information submitted to HMRC on the Company's tax affairs with the information used for the calculation of the tax element of the Company's Maximum Regulated Revenue as calculated in accordance with Paragraph 9 of Annex 2 of the Licences.

Limitation of Scope

We would specifically note the following limitations on our procedures;

- We have not audited the Company's statutory tax returns submitted to HMRC nor have we reviewed the appropriateness of the capital spend allocation to the respective capital allowance pools in each of those statutory tax returns.
- We have not audited the Financial Data RIGs submitted to the Utility Regulator which set out actual costs for the Company in accordance with the various licence terms.
- We have not audited the components of the Company's Maximum Regulated Revenue as calculated in Paragraph 3 of Annex 2 of the Licences.
- In various schedules figures reflected in either the statutory tax returns or the statutory financial statements have been allocated to regulatory periods on different bases e.g. on a specific allocation basis or on a time apportioned basis. We have not audited in detail these allocations to the regulatory period, however where appropriate, we have

compared the total of the relevant figures across the entire period from 1 April 2020 – 31 March 2022.

- We note there has been retrospective adjustment in respect to the 2017-2018, 2018-19 and 2019-20 reports due to changes in the WACC percentages. A review of these adjustments is not part of the scope of our work, and we understand these changes have already been discussed and agreed with the regulator.

Approach

In order to complete this engagement, we adopted the following approach:

- Meetings were held with the Regulatory Reporting team to discuss the content of the Tax Reports and the models used to calculate the tax entitlement amount.
- Verified the calculation of the Tax Amount per Paragraph 9 of Annex 2 of the RP6 Transmission and Distribution Licences.
- Verified the underlying numbers within the tax reports to the source documents as listed below;
 - Financial Data RIGS Reporting workbook
 - RP6 Financial model
 - RP6 Tax Reports
 - Reporting Workbook

We understand the Regulator has reviewed the numbers within the above source documents. As noted above, we have not audited the source documents.

- Verified the opening balances of the regulatory capital allowance pools. The opening values for 20/21 reflecting the values set out in Table 4 and Table 9 of the 19/20 Tax report which was audited previously as part of RP6 Transmission and Distribution Licences.
- Verified the allocation of capital additions (including the incentive amounts) to the appropriate regulatory capital allowance pools to ensure these reflected the same allocations as those in the Statutory Tax submission, other than differences as noted under limitations in scope.
- Checked the analysis of the tax allowance set out in the Tax Reports to the tax returns submitted to HMRC.
- Verified the allocation of capital additions per the Statutory tax return (based on a Calendar Year) to the allocation of capital additions per the regulatory reporting period (April to March), other than noted above under limitations of scope.
- Agreed the reconciliation of Tax Entitlement to Statutory Tax, subject to the timing difference as highlighted under limitations in scope above.
- Verified the reconciliation of capital additions per the statutory tax return to regulatory additions for each capital allowance pool.

Opinion

Based on our examination as above, we report that based on our findings, in our opinion the Tax Reports are consistent with the records we inspected and has been prepared, in all respects, in accordance with the requirements of the Licence.



Brendan McSparran
Tax Partner
Ernst & Young LLP
Belfast
20 December 2024