Accounting separation Methodology Statement

Part 1 of this methodology relates to the analysis of operating costs. The methodology used for the analysis of fixed assets, capital expenditure and depreciation is covered in part 2 from page 16 onwards. The information provided by both parts applies to the price control tables and those showing additional segmental reporting and regulatory information in the Annual Performance Report (APR) and it conforms to the latest Ofwat guidance.

1. Operating cost analysis tables

Methodology

The Company's financial accounts are held on SAP. SAP reports are the source data used to populate the relevant APR and cost assessment tables in notes 2B, 2C, 4B, 4D, 4F, 4J and 4V of the Regulatory Accounts, with subsequent allocations made outside of SAP on a spreadsheet.

Operating costs are assigned cost centres and general ledger account codes within SAP. The cost centre denotes the managerial area in which the cost has been incurred; the account code denotes the type of expenditure.

A SAP report is produced which shows the operating costs by cost centre and account code, and it is exported to a spreadsheet. In the spreadsheet, cost centres are assigned an Ofwat business unit, or the operating cost analysis table headings, (see appendix 1) as follows:

- Water Resources
- Raw Water Distribution
- Water Treatment
- Treated Water Distribution
- Retail (household and non-household, measured and unmeasured)
- General and Support
- Allocation (used where a cost centre straddles more than one business unit)
- Rates
- Other Business Activities
- Third Party
- Not used

70% of costs are allocated directly to the headings listed above, with 30% being allocated to "allocation". The headings include appropriate costs as per the most recent definitions provided by Ofwat in sections 2.41, 2.51 and 2.61 of RAG 2.07. Where cost centres have more than one method of allocation the methodology table in appendix 1 reflects this.

16.0% of 'other' operating costs are directly allocated with the remainder either requiring analysis to allocate, a management estimated split or another means of allocation.

Costs are allocated to the appropriate Ofwat business unit, which determines the price control or segment in which the expenditure should appear. Where cost centres are not directly allocated to an Ofwat business unit reallocations are made. The basis of allocation for each cost centre is shown in appendix 1.

The General and Support assets are reallocated to the appropriate Ofwat business unit, as are allocation assets, according to the agreed methodology for each cost centre in those categories. The percentage split of the general and support costs across the price control units is 85.8% wholesale, 13.6% Retail Household and 0.6% Retail Non-household.

The general and support costs are identified in appendix 1. General and support wholesale costs are allocated according to the appropriate driver identified in RAG 2, for example FTEs. General and support retail costs are allocated according to total customer numbers, to household, non-household, measured and unmeasured headings.

The type of cost allocation methodology applied is based on the following hierarchy:

1. Direct Allocation: 100% allocation to a single business unit as defined in the cost centre accounts
2. Activity based allocation: An activity based analysis to allocate cost centres across the differing business units
3. Managers assessment of time: Senior manager estimate based largely on estimate of time related to cost centre activity in a business unit
4. Pro-rated to primary costs: allocation of cost centre costs with reference to ratio of costs to a defined measure e.g. direct costs or full time equivalents. This is prioritised over 3 where appropriate (e.g. general and support costs)

Power is allocated according to usage, measured by on-site meters. Where site costs are spread across more than one business unit, a manager's estimate is applied to allocate the cost of each site to Ofwat business units. Where the power costs relate to boreholes a further split is applied based on average pumping head. 36.0% of power costs are directly allocated.

While we had managed to increase the accuracy of the years power actuals in SAP, we were only able to obtain the data the month after it had been used. While this meant that the split of the actuals was more accurate, we didn't feel that we could move away from the current method of allocation. That said, it has meant that the variances between SAP actuals and the Regulatory split are lower.

Rates are reallocated using the proportion of the prior years MEAV values for the Cumulo rates, and FTEs for sewerage rates.

Other Business Activities (the incremental cost of regulation) is allocated according to

1. Managers' assessment of time
2. Full time equivalents in each business unit
3. 20% of regulatory costs are allocated to Retail in line with the most recent regulatory guidelines.

Third Party costs are individually analysed into business units.

Retail cost allocation

Retail costs are allocated to the household, non-household, measured and unmeasured categories according to the appropriate cost driver for the retail heading, as identified in RAG 2.07 2.51 and 2.61. Examples of our allocations include allocating general and support costs according to customer numbers, and Network customer enquiries and complaints are allocated according to the volume of network customer enquiries and complaints.

The sequence of allocation is that costs, identified by the cost centre on which the cost has been collected are first allocated to their retail headings, based on a management estimate where necessary.

The retail costs are then identified as household or non household using the appropriate driver identified in the OFWAT guidelines. Retail costs resulting from the management fee charged by our billing company are directly allocated between household and non household, with management estimates for the separation of measured and unmeasured costs, as they felt that

Ofwats suggested drivers wouldn't accurately reflect the measured and unmeasured split for each department. Where there are unexpected variances in either value or allocation, these management estimates are challenged, and amended as required.

Table 2C and 4F allocate Retail costs between Household and Non-household and measured and unmeasured.

In 19/20 the Retail Non-household costs continue to be minimal following Retail separation. Some costs, such as Development Services costs continue to be attributed to Retail Non-Household as agreed with OFWAT. At present we recover the cost of this work through Developer Contributions.

The BWBSL management charge forms a large part of our retail costs. These costs are broken down by category and the cost in each category is split between Bristol Water and Wessex Water at a fixed percentage rate irrespective of how the costs are split between the two companies. If Bristol Water require more meter reads than Wessex, we will still only receive around 20% of the metering costs incurred by BWBSL.

While it could be argued that this isn't an accurate way to reflect activity, it does reflect the actual agreement and actual costs incurred. Without the underlying agreement changing, a disaggregated split of all the different cost types would be entirely meaningless because it would bear no relationship to the costs we incur.

Miscellaneous headings

Doubtful debts (table 2C) are allocated directly to unmeasured and measured household, a small amount is wholesale.

Bulk Supply relates to the water provided to Bristol Water by Wessex to cover the area near Frome not covered by our network. These costs are split across Ofwat business units based on Wessex's prior year APR submission (tables 4D, 4J).

Infrastructure renewals expensed in the year are the Infrastructure Renewals Expenditure (IRE) charged to opex, split between Ofwat business units (tables 4D, 4J).

Non-infrastructure renewals expensed in the year are nil as this relates to expenditure on infrastructure assets and is not applicable to non-infrastructure assets (tables 4D, and 4J).
This is in line with Ofwats guidance that these line items are an approximation for the old IRE (which would have been prepared on UK GAAP)." and under this there was no non-infrastructure IRE. This is in line with the majority of other water and sewerage companies.

Atypical expenditure (4J) includes any material expenditure usually identified on the Central Items cost centre that would be considered exceptional items in the statutory accounts. A general threshold of £1m movement or greater is used to determine materiality.

Cash expenditure figures are identified and drawn from the Management accounts (tables 4D, and 4J).

Volume figures (table 4D) are provided by the Water Resources manager and the population figure (table 4D) is provided by the Leakage Technical Manager.

Water Resources operating cost analysis, and Table 4V

Table 4V requires the Water Resources business unit to be split into further detail. We identify each category of cost by cost centre or category, and then allocate the costs either directly, by analysis, by management estimate or by prorating, in that order of preference

There has been no increase to CRT abstraction charges above RPI, though we are currently resolving a dispute with the Canal and River Trust. The costs relating to this have been identified as part of the atypical spend in table 4J.

The second section of table 4V requires an analysis of employment costs. Costs identified as relating to employment for all categories excepting General and support and excluding retail are included in Employment costs. These figures are identified in the working file used to produce the APR tables. To include the capitalised elements a separate version of the working file is created where the cost elements that transfer labour costs to capital are excluded from the "employment" category.

General and support employment costs are calculated (excluding retail) from the working file to assign the Employment costs – indirectly attributed.

The costs associated with the Traffic Management act include both opex and capex permit fees based on Ofwats consultation where they stated that "*We are minded to require that all costs that arise as a result of complying with the legislation should be recorded*". Additionally, we have excluded fines and penalties as per Ofwats guidance in RAG 4.08.

Statutory water softening is nil as we do not soften the water we supply as drinking water.

Changes

As mentioned above a permit system has been introduced in the Bristol Water area for the first time this year, and the cost (excluding fines and penalties) is captured in table 4V.

There have been significant costs incurred this year relating to a dispute over the Canal and River Trust abstraction charges. While these costs have been added to the Water Resources abstraction line in table 4D and have been identified as atypical spend in 4J, we have not included them in the line Canal & River Trust service charges and discharge consents in table 4V as these costs are while these costs are not considered Service charges.

There will be some Raw Water Storage costs we need to capture relating to cleans of the Littleton and Purton raw water tanks, though these have been out of service for the last two years, however we are expecting to incur some costs in 20/21, and will pick these up going forward.

For the water Imported from Wessex we have also included their split between Abstraction charges and Raw water abstraction, as well as their allocation over the Water resources headings as part of table 4V based on their previous years submissions.

Operating cost variations year on year

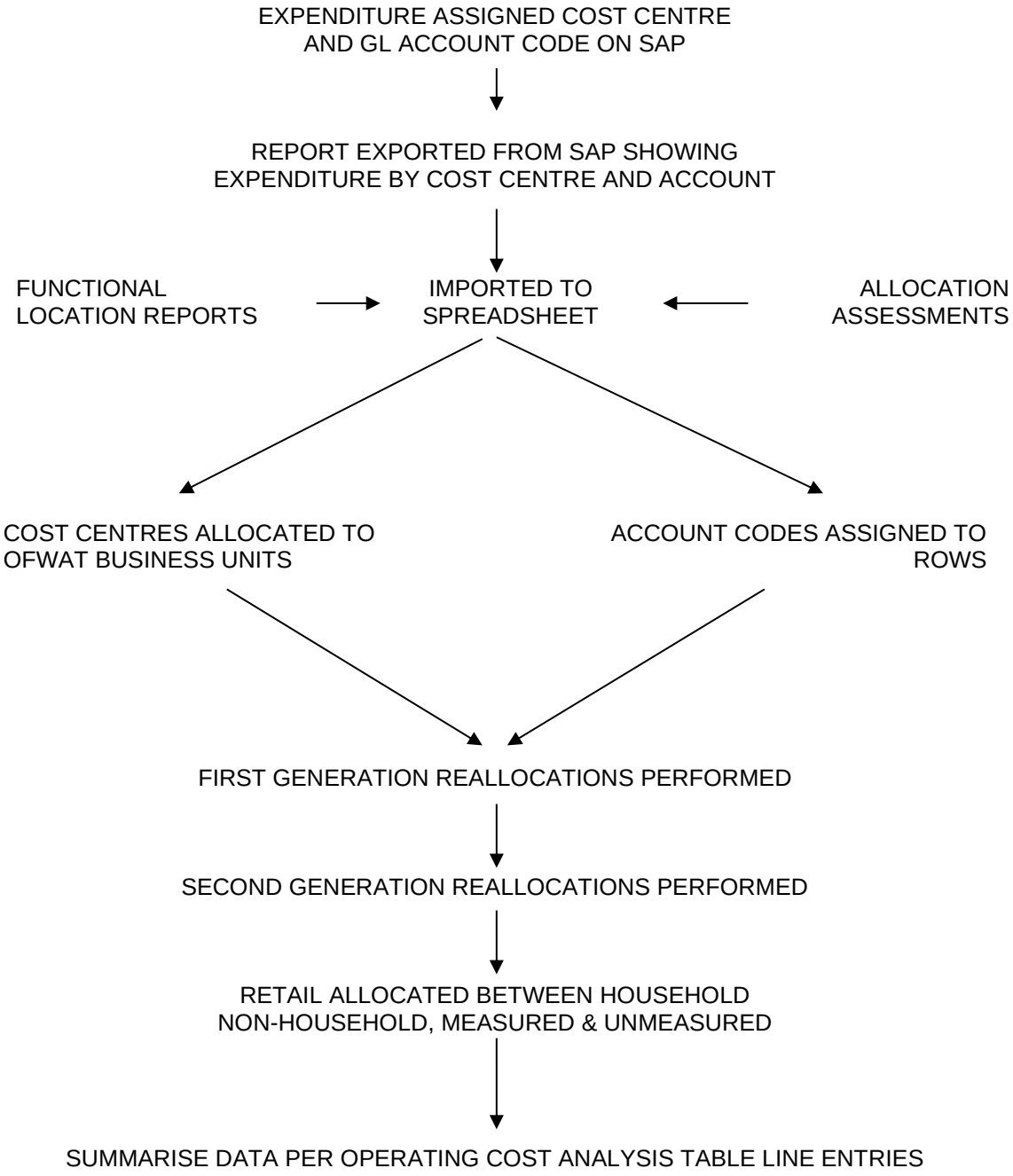
Real variations between 18/19 and 19/20 operating costs are shown in appendix 2.

Further analysis required for totex analysis of wholesale water (4D)

Each Ofwat business unit has been mapped to the accounting services using the criteria stated in the latest Regulatory Accounting Guidelines.

Wholesale	Ofwat Business Unit	Service	Operating Costs	Fixed Assets
Water Resources	Resources	Abstraction licence	Cost of abstraction licenses from BWB and EA.	Not applicable to fixed asset register. Abstraction licences through opex only
		Raw water abstraction	Contains all resources costs except abstraction licenses.	Includes all resources assets
Network +	Raw water distribution	Raw water transport	Includes all raw water distribution assets except less than 15 day raw water impounding reservoir	Includes all raw water distribution assets except less than 15 day raw water impounding reservoir
		Raw water storage	Assets identified as raw water impounding reservoir with less than 15 day storage	Assets identified as raw water impounding reservoir with less than 15 day storage
	Treatment	Water treatment	Includes all treatment costs	Includes all treatment assets
	Treated water distribution	Treated water distribution	Includes all treated water distribution costs, including Highlift pumps	Includes all treated water distribution costs, including Highlift pumps

OPERATING COST ANALYSIS TABLE METHODOLOGY



APPENDIX 1

Cost Centre	Description	Basis of Allocation/direct	General and Support	Allocation type	W Res %	RW Dist %	W Treat %	TW Dist %	Retail %
1005	Bad Debts	Direct		1				6%	94%
1006	Customer Relationships	Direct		1					100%
1006	Customer Relationships	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
1010	Wholesale Services	Ratios of service analysis direct costs	General & support	3	26%	1%	24%	48%	
1010	Wholesale Services	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
2004	Production Management	Manager Estimated %		3	10%	10%	65%	10%	5%
2015	Asset Information Management Team	Manager Estimated %		3	5%	10%	50%	35%	
2015	Asset Information Management Team	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
2018	Production Programme	Manager Estimated %		3	5%	10%	75%	10%	
2018	Production Solutions	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
2019	Production Optimisation and Development	Manager Estimated %		3		5%	90%	5%	
2020	Production ICA	Manager Estimated %		3	1%	4%	55%	40%	
2100	Purton	Drect and Analysis of flows for pretreatment		2			100%		
2140	Production North	Analysis of works orders		2	8%	7%	74%	11%	
2150	Prod North TW	Direct		1			100%		
2160	Prod North Raw Water Pumping Stations	Direct		1		100%			
2170	Prod North Catchment Sites	Direct		1	100%				
2180	Shipton Moyne TW	Direct		1			100%		
2200	Littleton	Direct		1			100%		

2300	Barrow	Direct		1			100%		
2320	Stowey TW	Direct		2			100%		
2340	Prod East	Analysis of works orders		2	8%	7%	74%	11%	
2350	Prod East TW	Direct		1			100%		
2360	Prod East Raw Water Pumping Stations	Direct		1		100%			
2370	Prod East Catchment Sites	Direct		1	100%				
2420	Banwell	Direct		1			100%		
2430	Axbridge	Direct		1	100%				
2440	Prod West	Analysis of works orders		2	8%	7%	74%	11%	
2450	Prod West Treatment Works	Direct		1			100%		
2460	Prod West Raw Water Pumping Stations	Direct		1		100%			
2470	Prod West Catchment Sites	Direct		1	100%				
2480	Cheddar TW	Direct		1			100%		
2600	R & T network	Analysis of Process code split		2				100%	
2540	Production Support Services	Manager Estimated %		3	50%	5%	35%	10%	
3099	Asset Info Projects	Manager Estimated %		3	5%	10%		85%	0%
3110	NM Contract Metering	Direct		1				100%	
3120	NM Contract Repair & Maintenance	Direct		1				100%	
3140	NM Contract New Mains and Services	Direct		1				100%	
3200	O&M North	Analysis of works orders		2				88%	12%
3210	O&M North Dist	Analysis of works orders		2				88%	12%
3220	O&M North Trunk Mains	Direct		1				100%	
3230	O&M North Raw Water Mains	Direct		1		100%			
3240	O&M North Leakstop	Direct		1				100%	

3250	O&M North Service Reservoirs	Direct		1				100%	
3260	O&M North Pumping Stations	Direct		1				100%	
3400	Metering	Direct		1				100%	
3410	Network PMO	Direct		1				100%	
3800	Network Management	Analysis of cost centre totals		2				91%	9%
3801	Stores Overheads	Direct		1				100%	
3802	Rechargeable Overheads	Manpower figures - FTE	General & support	4	7%	2%	20%	57%	14%
3803	Water Regulations	Direct		1				100%	
3805	Rechargeable Work	Direct		1				100%	
3806	Op Customer Services	Direct		1					100%
3806	Op Customer Services	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
3808	Procurement Service	Ratio of materials/consumables costs	General & support	4	1%	1%	82%	16%	
3811	Rech other- FPQ	Direct		1				100%	
3813	Network Schedulers	Base on work of staff being scheduled		2				92%	8%
3816	Standpipe Hire Costs	Direct		1				100%	
3817	Ret NHH non primary	Manager Estimated %		3				100%	
4001	Civils / Mains Projects	Ratios of service analysis direct costs	General & support	4	26%	1%	24%	48%	
4002	Land Surveyor	Ratios of service analysis direct costs	General & support	4	26%	1%	24%	48%	
4002	Land Surveyor	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
4003	H/O Maint	Ratios of direct costs	General & support	4	23%	1%	21%	42%	14%
4004	Development Services	Direct		1				100%	
4005	New Supplies	Direct		1					100%
4005	New Supplies	Direct		1					100%
4103	Network Planning	Direct		1				100%	

4105	Demand Management	Direct		1				100%	
4199	Network Planning Projects	Direct		1				100%	
4200	Abstraction Charges	Direct and analysis of bulk import		2	98%		1%	2%	
4308	FM Services	Manpower figures - FTE	General & support	4	7%	2%	20%	57%	14%
4309	Non-spec op sites	Manpower figures - FTE	General & support	4	7%	2%	20%	57%	14%
4310	Project River	Direct		1				100%	
4500	H/O Heat and Light	Ratios of direct costs	General & support	4	23%	1%	21%	42%	14%
4503	Telecoms	Manpower figures - FTE	General & support	4	7%	2%	20%	57%	14%
4503	Telecoms	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
4504	Power	Analysis of electricity costs by site		2	19%		34%	47%	
4504	Power - Production	Analysis of electricity costs by site		2	19%		34%	47%	
5000	Information Systems management	Manpower figures - FTE	General & support	4	7%	2%	20%	57%	14%
5002	Process Science	Manager Estimated %		3	23%		41%	25%	11%
5002	Process Science	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
5003	Business Resilience	Ratios of direct costs	General & support	4	23%	1%	21%	42%	14%
5004	Scientific Services	Manager Estimated %		3	25%		37%	27%	11%
5006	Environment Manager	Ratios of service analysis direct costs	General & support	4	26%	1%	24%	48%	0%
5006	Environment Manager	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
5100	Financial Accounts	Manpower figures - FTE	General & support	4	7%	2%	20%	57%	14%
5100	Financial Accounts	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
5101	Regulation & Change	Management estimate		3	30%	5%	15%	30%	20%
5101	Regulation & Change	Ratios of direct costs	General & support	4	23%	1%	21%	42%	14%
5103	Compensation and uninsured losses	Pro rata, with Employees liability by FTE		4	26%	1%	28%	39%	6%
5109	Central items	Analysis		2	99%			1%	

5109	Central items - manpower costs	Manpower costs		2	7%	2%	20%	57%	14%
5109	Central items - General and Support	Ratios of direct costs	General & support	4	23%	1%	21%	42%	14%
5111	Admin Sals Recovs	Manpower figures - FTE	General & support	4	7%	2%	20%	57%	14%
5114	Rates	MEAV allocations (cumulo) /FTE (local)		2	26%	3%	6%	65%	0%
5120	Periodic Review	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
5124	Administration section	Ratios of direct costs	General & support	4	23%	1%	21%	42%	14%
5126	Business Improvement	Ratios of direct costs	General & support	4	23%	1%	21%	42%	14%
5127	Strategic Asset Management	Ratios of direct costs	General & support	4	23%	1%	21%	42%	14%
5131	Transformation Prog	Manpower figures - FTE	General & support	4	7%	2%	20%	57%	14%
5132	NMSC Project	Manpower figures - FTE	General & support	3	7%	2%	20%	57%	14%
5200	General Management	Directors Remuneration by managers estimate (Retail estimate and FTE)	General & support	3	6%	1%	17%	50%	25%
5200	General Management	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
5201	Human Resources	Manpower figures - FTE	General & support	4	7%	2%	20%	57%	14%
5202	Corporate Affairs	Direct		1					100%
5202	Corporate Affairs	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
5202	Corporate Affairs	Ratios of service analysis direct costs	General & support	4	26%	1%	24%	48%	0%
5203	Recreations Amenities	Direct		1	100%				
5206	General Legal	Ratios of direct costs	General & support	4	23%	1%	21%	42%	14%
5206	General Legal	Allocation on basis of Time Spent		3	30%	5%	15%	30%	20%
5209	Health & Safety	Manpower figures - FTE	General & support	4	7%	2%	20%	57%	14%
5210	Training	Manpower figures - FTE	General & support	4	7%	2%	20%	57%	14%
5212	Community and Charities	Ratios of service analysis direct costs	General & support	4	26%	1%	24%	48%	0%
	Borehole maintenance allocation	Analysis of works orders		2	49%		51%		
5399	Environmental Projects	Ratios of service analysis direct costs	General & support	4	26%	1%	24%	48%	0%

Key to allocation type	
1	Direct Allocation
2	Activity based Allocation
3	Management estimate applied
4	Other means e.g. pro rata

Real variations between 18/19 and 19/20 operating costs

		2018/19	2018/19 inflated to 2019/20 prices	2019/20	Change in costs in real terms
		£m	£m	£m	£m
Wholesale	Operating expenditure	59.7	61.2	64.2	3.0
Retail	Operating expenditure	11.3	11.6	13.5	1.9
	Total operating costs	**71.0**	**72.8**	**77.7**	**4.9**

The real increase in total operating costs is £4.9m. This consists of:

Table 1	One-off variances		Wholesale Opex variances		Total £m
	£m	Explanation	£m	Explanation	
Employment Costs	0.0		-0.2	Continued slight reduction in Production spend on Catchment activities and Axbridge pretreatment which wasn't needed in 19/20 as well as a slight reduction in Network projects.	-0.2
Power	0.0		-0.2	Continued reduction in agreed forward base power price, offset by non commodity price increases	-0.2
Hired and Contracted Services	1.7	Further increase in Canal and River Trust Arbitration process costs	-0.3	£1.2m reduction in Network contracted services due to an increased capitalization of network bursts, offset by £1.1m unrecoverable S74 charges. £0.2m reduction in Purton maintenance costs	1.4
Service Charges	0.0		-0.1	Abstraction charges static in line with the agreement (CRT) or fall slightly (EA). The drop is due to a consolidation of the Shipton Moyne and Tetbury licences, plus a backdated credit, resulting in reduction in real charge.	-0.1
Materials and Consumables	0.0	Electrosteel credit for materials in prior year, was also received in 19/20	-0.5	£0.2 reduction in Chemical costs partly due to an easing of the previous years Caustic Acid price spike. £0.3m decrease in Network costs, due to an increased capitalization of network bursts.	-0.5
Other Business Activities	3.9	Increase in costs relating to CMA arbitration process	-0.8	Reduction in associated Periodic review charges, as the larger volume of the work was completed in the prior year.	3.1

Other direct costs			0.2	£0.2m increase in sundry bad debts.		0.2
General and support expenditure	-0.3	Reduction in transformation costs relating to tender for major new contractors as now complete.	-0.2	0.4 -0.2 -0.3 -0.6 0.3 0.1 0.1	Increase in IT maintenance costs Finance. Decrease in pension scheme running costs. Business Improvements decrease due to reduction in contracted staff. General Management reduction due to a transition to salaried staff over contracted, lower bonus and increase in capitalization. Reduction in Head office maintenance Civils. Naming rights charge. Central Items. Lower volume of accrual write offs	-0.5
Third Party Services	0.0		-0.2	-0.2 relating to lower volume of mains diversion and damages work		-0.2
Wholesale Opex	**5.3**		**-2.3**			**3.0**

Retail operating cost variances identified below.

Table 2	**One-off variances**		**Retail Opex variances**		**Total £m**
	£m	**Explanation**	**£m**	**Explanation**	
Doubtful Debts	0.0		0.5	Increase in doubtful debt charge due to worsening trend indicative of future collection rates particularly with reference to the expected COVID19 impact	0.5
Network customer enquiries and complaints	0.0		0.4	Increase in retail related network activities	0.4
Other direct costs	0.0		0.2		0.2

Other business activities	1.0	Increase in costs relating to CMA arbitration process	-0.2	Reduction in associated Periodic review charges, as the larger volume of the work was completed in the prior year.	0.8
Retail Opex	**1.0**		**0.9**		**1.9**

2. Fixed Assets, Capital Expenditure & Depreciation Analysis

Reporting Requirement:
To complete various data lines in the APR tables 2A, 2B, 2C, 2D, 4D, 4F, 4J, 4V in line the latest reporting guidance documents.

Purpose
This document describes the method of extracting the fixed asset data from our SAP system and using this data to provide figures for each capital expenditure and depreciation line in the relevant categories in APR tables above. It aims to show the basis of the Ofwat business unit mapping of our assets to enable reporting and the checks and controls involved on completion of the tables.

Reporting Process

Analysis of Fixed Assets - Overview

The fixed asset register is held on SAP. Fixed assets are created in SAP once the projects are completed and in service, please refer to Appendix 2 for our capitalisation policy.

A suite of reports is available in SAP to provide fixed asset movements, showing additions and cumulative totals along with additional data such as business unit. These reports are the source data used to populate the capital expenditure lines and depreciation values in APR tables 2A, 2B, 2C, 2D, 4D, 4F, 4J and 4V of the Regulatory Accounts with subsequent allocations made outside of SAP on a spreadsheet.

The fixed asset register in SAP holds both Historic cost and Current cost fixed assets.

Each asset within the fixed asset register is assigned a CCA class. The CCA class determines the type of asset and whether an asset is an:

- Infrastructure asset
- Operational asset
- Other asset

The CCA classes have been mapped to the Ofwat Business Units using the Ofwat guidance. This is detailed in Appendix 1 to this commentary.

Additional flags have been set up on the fixed asset register which hold the Ofwat Business unit to aid the completion of the tables in the regulatory accounts, and assigned to each asset. The Ofwat Business Unit flags used are:

- Water Resources
- Raw Water Distribution
- Water Treatment
- Treated Water Distribution
- Retail
- Retail household
- Retail non household
- General and Support
- To be allocated (used where an asset straddles more than one business unit)

These flags can then identify where each asset sits within the following table showing the wholesale price control unit segments:

Wholesale	Ofwat Business Unit	Service	Operating Costs	Fixed Assets
Water Resources	Resources	Abstraction licence	Cost of abstraction licenses from BWB and EA. Does not include Purchase of Water (imports).	Not applicable to fixed asset register. Abstraction licences through opex only
		Raw water abstraction	Contains all resources costs except abstraction licenses	Includes all resources assets
Network +	Raw water distribution	Raw water transport	Includes all raw water distribution assets except less than 15 day raw water impounding reservoir	Includes all raw water distribution assets except less than 15 day raw water impounding reservoir
		Raw water storage	Assets identified as raw water impounding reservoir with less than 15 day storage	Assets identified as raw water impounding reservoir with less than 15 day storage
	Treatment	Water treatment	Includes all treatment costs	Includes all treatment assets
	Treated water distribution	Treated water distribution	Includes all treated water distribution costs, including Highlift pumps	Includes all treated water distribution costs, including Highlift pumps

Process - Throughout the year

When assets are created, they are given the appropriate flags within SAP as set out above. When allocating these flags to the assets, we consider criteria such as, what type of asset, the project it relates to and the location of the asset. The physical site and type of asset is used as a reference point in establishing the business unit to which an asset is allocated. Further information on the mapping of different type of asset classes and the appropriate business unit can be found in Appendix 1.

Assets that cannot be attributed a specific business unit within wholesale or retail price control units are given either Gen&Sup flag or TBA flag dependent on whether it is an operational asset e.g. pumping asset or general asset e.g. computers. These are then allocated based on the most appropriate method or as stated within the latest RAGs at year end.

Process - At year end reporting

- In SAP, run the asset movement report (SAP transaction ZHCA_ASSET_MOVEMENTS) for the financial year ending date. This report will list all assets in our fixed asset register line by line. It also shows the opening cost, additions, disposals, cost year end, depreciation charge and cumulative and net book value,
- Change the layout of the report in SAP to include the data fields for CCA class, Ofwat Business Unit, Base or Enhancement. These are the flags that have been maintained throughout the year.
- This report is exported to a working spreadsheet in Excel where further allocations and analysis is carried out. Update the Allocations such as full time equivalent and customer numbers for the year from the operating expenditure analysis working spreadsheet to ensure consistency.

- The main data downloaded is entered on tab HCA 2019-20 in the working spreadsheet from which the data automatically flows to the proforma tables e.g 4D.
- The total figures are sense checked;
  - against management accounts totals and
  - delivery (capital) plan figures.
- Any corrections are identified and corrected and adjustments such as accruals are added.

APR table Completion

Capital expenditure lines
Table 4D, 4J, 2B

The working spreadsheet includes formulas to pick up the Ofwat Business Unit flags stated above along with the CCA class and base and enhancement class against each asset to pick up the capital expenditure lines on tables 4D, 4J.and 2B

B	Capital Expenditure
4D.12	Maintaining the long term capability of the assets - infra
4D.13	Maintaining the long term capability of the assets - non-infra
4D.14	Other capital expenditure - infra
4D.15	Other capital expenditure - non-infra
4D.16	Infrastructure network reinforcement
4D.17	Total gross capital expenditure (excluding third party)
4D.18	Third party services
4D.19	Total gross capital expenditure
4D.20	Grants and contributions

The asset data downloaded in tab HCA 2019-20 will populate the following lines:

Line	Criteria
4D.12	Assets with INFRA CCA asset class only
4D.13	Assets with a BASE flag and non-infrastructure CCA class
4D.14	Assets with a ENHN flag and infrastructure CCA class
4D.15	Assets with a ENHN flag and non-infrastructure CCA class

Additionally, the data will populate the business units such as water resources, raw water abstraction to the correct column in table 4D. This is based on the Ofwat business unit flag which has been mapped with formulas in the table or from the allocation tabs for general and support assets.

4D.16 Infrastructure network reinforcement
Additional line for Infrastructure network reinforcement is calculated from identifying the schemes within growth/new development which would be included in infrastructure charges. A working paper has identified the current schemes that meet this criteria and the expenditure is deducted from the lines for enhancement spend line 4D.14 or 4D.15 depending on whether they are infrastructure or non-infrastructure schemes. This is in line with table 2J.

For 19/20 the schemes and expenditure included in line 4D.16 are as follows:

Infrastructure Network Reinforcement Costs 2019/20

Scheme	Code	Description	Expenditure	Classification
Infrastructure Mains	BI-2243	Upstream reinforcement works for Devlopments	£ 505,782.00	Line 2J1 Distribution and Trunk Mains
Forum to Shepton Mallet Mains	BI-2177	Growth Mains for Shepton Mallet	£ 9,212.00	Line 2J1 Distribution and Trunk Mains
Tetbury Main	BI-2180	Growth Mains for Tetbury Area	£ 281,794.00	Line 2J1 Distribution and Trunk Mains
		Total Line 2J1	**£ 0.797**	Million
Croscombe Reservoir	BN-2181	New reservoir for development growth Shepton area	£ 311,202.00	Line 2J2 Pumping and Storage Facilities
Timsbury-Clandown PS	BN-2178		18,206.84	Line 2J2 Pumping and Storage Facilities
		Total Line 2J2	**£ 0.329**	Million
			£ 1.126	

4D.18 Third party line
Download a movement report from SAP to extract all assets with expenditure at the Purton/Pucklechurch location codes (243, 244, 245 and 247). The report shows which business unit each asset was allocated to. Apply the percentage agreed in the contract to calculate the third party services (see working paper). This represents the assets involved in the bulk water supply to Wessex Water

4D.20 Contributions line
A movement report from SAP to identify the assets created from the contribution scheme numbers was extracted and split into the business units. This figure was matched with the management accounts contributions total. The Development Services team provided any adjustments to this figure.

Table 4J – Atypical Expenditure
There were no Atypical capital expenditure identified in 2019-20 therefore the data is the same as table 4D.

Table 2B – Totex Analysis
Automatically populated from table 4D**.**

Table 4V – Operating Cost Analysis Water Resources
To complete line 4V.7 depreciation the same working spreadsheet for table 4D is used. An additional column added to the data download tab. Each water resource asset should be allocated a category as follows:

- Impounding reservoir
- Pumped storage
- River abstraction
- Groundwater
- Other

There are no assets attributable to the remaining columns (Artificial Recharge or Aquifer Storage)

A tab showing the water resources split has formulas to pick up the data in the column and populates the depreciation in table 4V.

Tangible/Intangible assets – Table 2A, 2C, 2D
To complete tables showing the split between intangible and tangible depreciation and table 2D requires a second working spreadsheet.

- Copy the spreadsheet used from before for 4D, but
- Assets considered as software (asset class 29000) were identified as intangibles and excluded from the fixed asset data download tab (HCA 2019-20).
- This will automatically populate the proforma table 2D using formulas
- On the intangibles depn tab update with any new intangible assets in the year with the business unit data.
- The formulas will update table 2A with intangible depreciation line 2A.5. The tangible depreciation line is the remaining balance from the data download tab.

Table 4F Retail Household Measured/Unmeasured
Depreciation and capital expenditure lines

Export to a excel spreadsheet, an asset movement report from SAP selecting 'Retail' business unit only The SAP download provides an additions and depreciation figure as well as the capitalisation date, description, asset class and business unit against each asset.

In order to complete the depreciation and capital expenditure lines for measured and unmeasured, all retail assets attributed to Retail household were further identified as whether they were:

- Specifically, measured assets - the assets typically identified as measured were meter reading equipment and vehicles
- Tangible or intangible assets – Asset class 29000 (software) are identified as intangible only.
- Capitalised up to 31 March 2015 or from 1st April 2015 using the SAP capitalised date on each asset.

The additions column and depreciation column from the SAP download on the remaining retail assets were apportioned between measured and unmeasured using customer unmetered/metered numbers.

Allocation to wholesale and retail

In line with the latest guidelines, assets have been directly attributed to one of the price control units - wholesale water and household retail. Since 2017/18 reporting, we no longer hold any retail non household assets in our Fixed Asset Register The assets with a retail flag are included in retail household price control unit only and no recharge is necessary as no non household activity is carried out.

Where an asset is used by more than one of these price control units, then they have been reported based on their principal use.

The assets affected are those identified with business unit flag general and support. The general and support assets are wholly included in wholesale water price control unit. A recharge is calculated within the working spreadsheet and reported to/from wholesale and retail household using appropriate allocation basis. This is further split into water resource and Network+ categories.

The general and support element is allocated to Ofwat business units in proportion to full time equivalents employed in those business units excluding the retail element or as a percentage of directly allocated assets for example, vehicles. The full time equivalent including the retail element percentage was used to calculate the recharges.

Where appropriate, allocations are consistent with the Operating cost analysis table allocations.

The following table shows the percentage of allocated assets in comparison to the total gross cost at year end and net book value. This analysis is taken from HCA including intangibles spreadsheet which produces table 4D and 2B.

Assets	Gross Cost at Year End	NBV
General & Support	8.38%	6.09%
To be allocated	0.94%	0.36%
Total	**9.31%**	**6.45%**

The above table shows that over 90% of the total gross cost at year end and 93% of the net book value is directly assigned to Ofwat business units.

The two largest asset categories in 'General and Support', which account for 78% of the total gross cost and 77% net book value at year end of 'General and Support' assets, are computers and land and buildings. The table below shows that, for example, 22% of computer assets are allocated directly to Ofwat business units, and 78% (£38.8m) to general and support. The general and support element is allocated to Ofwat business units in proportion to full time equivalents employed in those business units excluding the retail element.

	Gross Cost Year End			Net Book Value			
Assets	**Directly allocated**	**Allocated to General and support**		**Directly allocated**	**Allocated to General and support**		**Basis of Allocation**
	%	**%**	**£m**	**%**	**%**	**£m**	
Computer	22%	78%	38.807	17%	83%	14.855	Full time equivalent %
Land & Bldgs	14%	86%	19.189	14%	86%	12.823	Employment costs %
Other general and support			16.457			8.432	Based on % of directly allocated assets
Total general and support			74.453			36.110	

Where appropriate, allocations are consistent with the Operating cost analysis table allocations. For tables 2B and 4D general and support assets were allocated wholly to wholesale across the business units by using full time equivalent excluding the retail element or as a percentage of directly allocated assets for example, vehicles. The full time equivalent including the retail element percentage was used to calculate the recharges in table 2A. The following table shows the total depreciation charge of general and support assets and the percentage included as a recharge for retail household, non-household segments.

	Gen&Sup depreciation total	Gen&Sup - retail element recharge	
	£m	£m	%
Total General and support depreciation charge	4.898	0.597	12.2%
Recharge - Retail household		0.597	100.0%

Analysis of all retail assets was carried out to produce figures for Retail table and to calculate the recharge figure in table 2A those that could be identified as principally or wholly retail was given a retail flag and attributed to retail household price control. The following table shows in more detail the types of asset within retail.

Assets type	Gross cost Retail	NBV Retail	Depn charge
	£m	£m	£m
General equipment	0.094	0.056	-0.001
Computer	9.918	2.410	-0.264
Land & Buildings	0.086	0.047	-0.012
Vehicles & Mobile Plant	0.292	0.050	-0.033
Total	10.390	2.564	-0.309

Changes to reporting 19/20

No allocation changes were identified in 2019-20.

IFRS 16 Leased assets
The reporting for 19/20 is in line with IFRS16.

There was an adjustment added to the brought forward balance for a retrospective recognition of the IFRS 16 change in reporting. This effected the cost and cumulative depreciation and is included on table 2D adjustments line (£0.753m and -£0.108m respectively).

The additions and depreciation recognised in the year has increased after including the NMSC leased assets by £1.729m and -£0.173m respectively and is reflected in the following lines:

	Description	Additions	Table line - Additions	Depn	Table line - Depn	Business unit
91017	Meter 66 printers	3,081.72	2D.4	-924.52	2D.9	TW DIST
91018	Head office photocopier	90,779.65	2D.4	-27,233.90	2D.9	GEN&SUP
91019	Purton solar panel lease	658,743.62	2D.4	-125,161.29	2D.9	WTREATMT
101248	NMSC leased vehicles	1,729,185.31	4D.13 & 2D.3	-172,918.53	2A.4 & 2D.10	TW DIST
		2,481,790.30		-326,238.24		

Significant Capital Expenditure Schemes – 2019-20

The additions within the year were largely within the treated water distribution business unit (£18.4m non infra and £36.2 infra). The following shows details of schemes which had significant spend in 2019-20 along with their business unit.

Scheme	Spend £m	Business Unit
GAC Replacement	0.4	Treatment
TW Equipment Failures	1.0	Treatment
Purton gas fired generator	2.1	Treatment
Purton Clarifiers	1.2	Treatment
Purton Solar Panel lease	0.7	Treatment
TW submerged membranes	0.5	Treatment
Electrochlorination	0.7	Treatment
	6.6	
NEP – Catchment/Investigations etc	1.0	Resources
Raw water Reservoir remedial works	0.6	Resources (IRE Capex)
	1.6	
Purton Raw Water reservoirs	1.2	Raw water dist RWST - IRE
Communication Pipes	3.2	TW Dist (Infra enhn)
Self Lay payments	1.9	TW Dist (Infra enhn)
Additional ALC	1.5	TW Dist (Infra enhn)
SRS Mains	1.2	TW Dist (Infra enhn)
Domestic & Ind Onsite/Offsite & self lay	2.6	TW Dist (Infra enhn)
	10.4	
Lead Communication pipe replacement	1.5	TW DIST (IRE Capex)
Trunk mains relining	0.4	TW DIST (IRE Capex)
Stop tap replacement	3.0	TW DIST (IRE Capex)
Zonal mains replacement	5.4	TW DIST (IRE Capex)
Mains replacement/relining	14.3	TW DIST (IRE Capex)
	24.6	
Metering	5.1	TW Dist (Non Infra)
Potable structures	0.8	TW Dist (Non Infra)
Leakage	0.3	TW Dist (Non infra)
NMSC vehicles – leased	1.7	TW Dist (Non infra)
Crosscombe reservoir	0.3	TW Dist (Non infra)
Hopewell PS Refurb	0.2	TW Dist (Non infra)
	8.4	
Transport & Plant	1.4	General & Support
Core IT investment	3.5	General & Support
SEMD	0.9	General & Support
Network Optimisation	1.1	General & Support
	6.9	

Assumptions

- Infrastructure network reinforcement figures are deducted from the 'other' enhancement capital expenditure lines in table 4D
- Measured/unmeasured retail expenditure and depreciation in 4F are identified as specifically measured from the asset description where possible but assume those not specific can be allocated using the customer measured/unmeasured numbers.

Data Assurance

- The total capital expenditure lines are checked against the delivery plan at year end to ensure accuracy of the total and the correct category e.g. infrastructure enhancement. This is confirmed with a member of the Financial Planning & Analysis team who oversee the delivery plan.
- All totals are reconciled to the management accounts along with the regulatory adjustments required by the current RAGs.
- A reconciliation of the enhancement capital expenditure with the regulatory adjustments required are then provided to the table owner for 4L.
- Validation checks within the APR tables are reviewed.

Reviewer

The Head of Finance is the reviewer for the above tables and checks the tables against the Management accounts and other regulatory tables.

External Assurance

Atkins Ltd provide the external assurance for section 4 tables – 4D, 4F, 4J, 4V
PWC provide external assurance on section 2 tables – 2A, 2B, 2C, 2D, 2E

Directors approval

This table is approved by the directors as part of the process of them signing off the Regulatory Accounts.

Processes and Systems

The fixed asset register is maintained on the SAP system. Assets added in the year are updated as per the 'throughout the year' process section above.

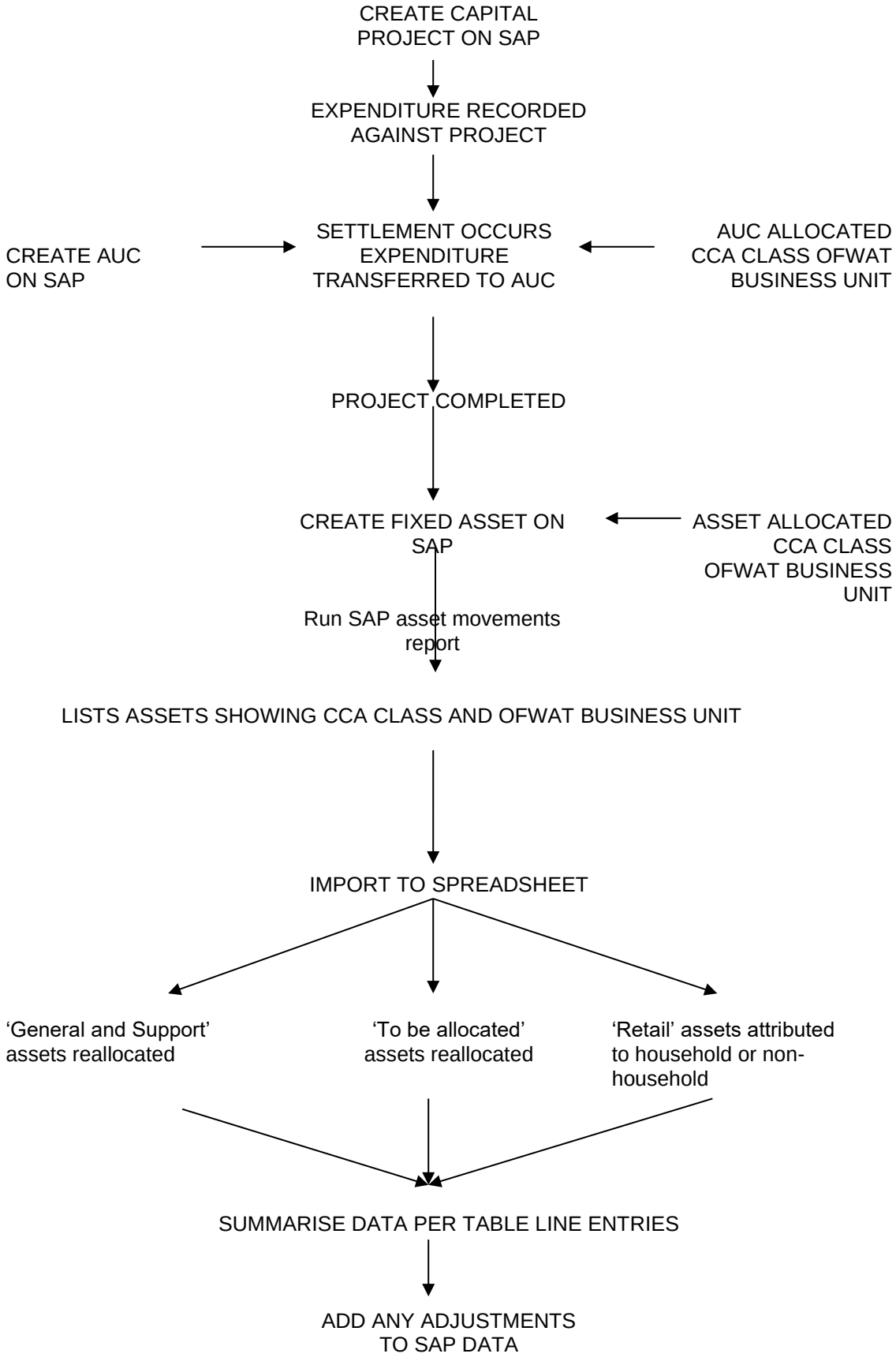
Improvement plan

No further improvements have been identified which will enhance reporting for the analysis of the fixed asset register at present.

Capitalisation policy

This is included in appendix 2

CAPEX METHODOLOGY



Bristol Water plc **APPENDIX 1** **ACCOUNTING SEPARATION METHODOLOGIES 2019**

CCA Class	Asset Class Name	Asset Inventory Category	Ofwat business units									
			Water Resources	Raw Water Distribution	Water Treatment	Treated Water Distribution	Retail	Retail Household	Retail Non Household	General and Support	To be allocated	Not Used
COHS	Company Houses	Other Management and General	Δ	Δ	Δ	Δ				Δ		
COMP	Computers	Computers	Δ	Δ	Δ	Δ	Δ			Δ		
CP3	C.P. 3rd Party Conts	*Grants & Contributions*										√
CPX3	C.P. (Ex. 3rd Party Conts)	Water Mains Ancillaries- customer (Infra)				√						
CRES	Collection Reservoirs	Dams & Impounding Reservoirs	Δ	Δ								
CRSN	Collection Reservoirs Non-Infra	Dams & Impounding Reservoirs	Δ	Δ								
DM	District Meters	Other Management and General				√						
GENE	General Equipment	Other Management and General	Δ	Δ	Δ	Δ	Δ			Δ		
HHM	Household Meters	Water Mains Ancillaries – Customer (Non-Infra)				√						
HODB	HO & Depot Buildings	Offices & Laboratories, Depots and Workshops	Δ	Δ	Δ	Δ				Δ		
INFR	Infra-Rev	*Infrastructure renewals spend*										√
L3PC	Land Third Party Conts	*Grants & Contributions*										√
LAND	Land Specialised	Depots, Res, TW-W3, Other, Offices, Booster PS	Δ	Δ	Δ	Δ				Δ		
LBNS	Land & Buildings Non-specialised	Depots, Intake & Source PS, Res, Dams/Impounding Res, Water TWR, TW-W2, W3 & W4	Δ	Δ	Δ	Δ				Δ		
LBSP	Land & Buildings Specialised	Booster, Source & Intake PS, Res, Dams/Impounding Res, Water TWR, TW-SD, W2, W3 & W4	Δ	Δ	Δ	Δ				Δ		
MN3P	Mains 3rd Party Conts	*Grants & Contributions*										√
MNX3	Mains excl 3rd Party Conts	Potable Mains and Other Mains		Δ(1 asset)		√						
NHHM	Non Household Meters	Water Mains Ancillaries – Customer (Non-Infra)				√						
NIAB	Non Infra Assets Buildings	*Grants & Contributions*										√
NIAD	Non Infra Assets Def Income	*Grants & Contributions*										√

CCA Class	Asset Class Name	Asset Inventory Category	Ofwat Business Units									
			Water Resources	Raw Water Distribution	Water Treatment	Treated Water Distribution	Retail	Retail Household	Retail Non Household	General and Support	To be allocated	Not Used
NIN3	Non Infra Contributions	*Grants & Contributions*										√
NONA	Non-appointed Assets	*Non-appointed assets*										√
OM	Operational Meters	Other Management and General		Δ	Δ	Δ					Δ	
PBB	Pumping Buildings Booster	Booster Pumping stations				√						
PBI	Pumping Buildings Intake	Intake Pumping stations	Δ	Δ								
PBS	Pumping Buildings Source	Source Pumping stations	Δ			Δ						
PMBL	Pumping Buildings	Intake, Source & Booster Pumping Stations	Δ	Δ	Δ	Δ					Δ	
PPB	Pumping Plant Booster	Booster Pumping stations				√						
PPI	Pumping Plant Intake	Intake Pumping stations	Δ	Δ								
PPS	Pumping Plant Source	Source Pumping stations	Δ			Δ						
PMPT	Pumping Plant	Intake, Source & Booster Pumping Stations	Δ	Δ	Δ	Δ					Δ	
RWT	Raw Water Tunnels	Raw Water Aqueducts	Δ	Δ								
SCRT	Security	Other Management and General	Δ	Δ	Δ	Δ				Δ		
SRC	Sources	Other Management and General	√									
SVRS	Service Reservoirs	Service Reservoirs				√						
TELE	Telemetry	Telemetry Systems and Other	Δ	Δ	Δ	Δ				Δ		
TWCV	Treatment Works - Civils	SD, W1, W2, W3, W4 Treatment works			√							
TWPT	Treatment Works - Plant	SD, W1, W2, W3, W4 Treatment works			√							
VCMP	Vehicles/Mobile Plant	Vehicles	Δ	Δ	Δ	Δ	Δ			Δ		
WTTW	Water Towers	Water Towers				√						
WWM	Waste Water Meters	Other Management and General				√						

Key: √ - Assets directly allocated to Business Unit by CCA class

Δ - Assets allocated by asset description or site – Gen&Sup/To be allocated assets allocated across business units by appropriate allocation method

APPENDIX 2

1. CAPITALISATION ACCOUNTING POLICIES

1.1. Definition of a Fixed Asset

An asset is an item that Bristol Water owns and uses in the course of its business. A fixed asset is an asset that we retain for more than a year. Some common examples within Bristol Water are treatment plant, pumps, land and buildings, water mains and services, office equipment, e.g. photocopiers, vehicles and computer hardware and software. It does not include consumable and stock items.

1.2. Infrastructure Assets

Infrastructure expenditure falls into two categories:

i. Costs in respect of the provision of additional infrastructure capacity or enhancement of the network are capitalised (these include projects such as new water mains, new connections and work on impounding reservoirs).
ii. Other infrastructure to do with repair and replacement such as boundary mains replacement, network analyses, lead replacements and high-risk crossings.

Types of Infrastructure assets

Infrastructure assets comprise the integrated network of impounding and pumped raw water storage reservoirs and water mains and associated underground pipework. Expenditure on such assets relating to increases in capacity and enhancements are included at cost. The cost of infrastructure assets is their purchase cost together with incidental expenses of acquisition and directly attributable labour costs, which are incremental to the Company.

1.3. Other assets

Other assets include land and buildings, operational structures, fixed and mobile plant, equipment and motor vehicles. These are generally categorised as non-infrastructure assets. All are included at cost. The cost of other assets is their purchase cost together with incidental expenses of acquisition and commissioning and any directly attributable labour costs, which are incremental to the Company.

1.4. Current Cost Accounting

We have maintained the CCA fixed asset register to estimate the current cost depreciation (CCD) figure in table 4G.

1.4.1. Tangible fixed assets

The valuation of all assets, except vehicles and mobile plant (see 'other fixed assets' note below), is based on the modern equivalent asset valuation produced by the Asset Management Plan (AMP) valuation at 31 March 2008, as amended for additions, disposals, and retail price index adjustments after this date to the period ended 31 March 2016. This equates to a proxy for depreciated replacement cost of their operating capability.

To the extent that the regulatory regime does not allow such assets to earn a return high enough to justify that value, this represents a modification of the value to the business principle. Also, no provision is made for the possible funding of future replacements of pre-31 March 1990 assets by contributions from third parties and to the extent that some of those assets would, on replacement, be so funded, replacement cost again differs from value to the business. Redundant assets are valued at their recoverable amounts.

1.4.2. Land and buildings

Non-specialised operational properties were valued on the basis of open market value for existing use at 31 March 2008 and have been expressed in real terms by indexing using the Retail Price Index ("RPI") since that date.

Specialised operational properties at 31 March 2008 were valued at the lower of depreciated replacement cost and recoverable amount and have been restated by adjusting for inflation as measured by changes in the RPI. The unamortised portion of third party contributions received since 31 March 1990 is deducted in arriving at net operating assets (as described below).

The valuation of land and buildings for both specialised and non-specialised properties is undertaken by a Chartered Surveyor employed by the company.

1.4.3. Infrastructure assets

Mains, impounding and pumped raw water storage reservoirs and dams are valued at a proxy replacement cost determined principally on the basis of data provided for the Asset Management Plan. A continuing process of refinement of asset records is expected to produce adjustments to existing values when periodic reviews of the AMP take place. This is in conjunction with the determination of price limits by Ofwat at 5 yearly intervals. In the intervening years, values are restated to take account of changes in the general level of inflation as measured by changes in the RPI over the year.

1.4.4. Other fixed assets

All other fixed assets are valued periodically at depreciated replacement cost. The last valuation included being at 31 March 2008. Between periodic reviews, values are restated for inflation as measured by changes in the RPI. Vehicles and mobile plant were stated at depreciated historical cost until 31 March 2008 as differences between historical cost and current cost values were not considered material. From 1 April 2008 RPI has been applied to vehicles and mobile plant, following a revaluation of assets at 31 March 2008 showed a significant difference between the historic and current cost values of these assets.

1.4.5. Surplus land

Surplus land is valued at recoverable amounts taking into account that part of any proceeds are to be passed on to customers under Condition B of the Licence of Appointment.

1.5. Fixed Asset Register

The Fixed Asset register is the Company's primary record of capitalised expenditure on fixed assets. It is part of the SAP computer system. The fixed asset register is managed by the Transaction team.

Capital costs are defined as those costs, which are incurred in providing an additional, or a replacement, non-infrastructure asset. In addition, costs in respect of the provision of additional infrastructure capacity or enhancement of the network are also capitalised. These costs are incorporated in the Balance Sheet as additions to fixed assets. Where non-infrastructure assets have been replaced their cost is removed from the Balance Sheet. There is no rule which requires capitalisation of any costs in excess of a specific value however it is unlikely that items with a value less than £1000 in total would be capitalised.

1.6. Fixed Asset Register Purpose and Scope

To manage Bristol Water's Fixed Assets Register and to depreciate the assets in this register over their natural lives allowing for any disposal or unplanned deterioration in their value.

2. PROCEDURES AND INTERNAL GUIDANCE FOR CAPITALISATION

2.1. Initiating a Project

The need for new assets or modifications to existing assets is wholly business driven. The five yearly Company Business Plan, against which OFWAT sets the Company funding level, sets out the major projects and the sums available for Capital Maintenance. Whilst the Business Plan will form the basis of the Capital Programme, the Planning Department will liaise with Operating and Engineering departments to identify the individual infrastructure and non-infrastructure projects.

2.2. Procedures governing Projects

There are policies held on our document management system (Ennov) governing and on Sharepoint:

2.2.1. Project Management Reference Book

The purpose of this procedure is to state how Engineering Projects shall be managed. It provides an overview of the requirements at each stage of the project. It is not prescriptive at a detailed level; the Project Manager shall detail the requirements appropriate to each project. It is currently held on Sharepoint, though it is intended to be added to an upgraded Ennov system in future.

2.2.2. RDENGEN-02 Code of Practice on Business Investment

This Code of Practice summarises the process necessary for implementation of the investment schemes. It is not prescriptive at a detailed level and should be read in conjunction with the detailed procedures covering specific areas of project management, particular, the Procedure for Management of Engineering Projects.

2.3. One off Projects and Rolling Schemes

The Company splits its capital expenditure programme into individual Projects. Projects are set up in SAP and comprise a unique project definition and a lower level work breakdown structure (WBS) against which costs are collected. Projects can have a defined life to build for example a treatment process or they can be "rolling schemes" such

as underground water mains for new housing developments, vehicles and meters that have no finite life. A budget is set for each project for each financial year.

3. CHECKS ON PROCEDURES AND GUIDANCE

3.1. Approval Process

Projects have to go through an approval process, the form of which depends on their value and the type of scheme. The approval process takes the form of a number of project gateways which are defined in the Project Managers' Reference Book. The appropriate project gateway (PG) form must be completed and approved to allow the project to progress.

The Investment Appraisal Forum shall consider new projects estimated to cost more than £50,000 or which represent a strategic change to the way the company operates its assets

The Project Manager shall prepare the relevant PG form for the Investment Appraisal Forum evaluating alternative solutions to meet the project objective and recommend a preferred option. The format for the report is detailed in the Project Managers' Reference Book. IAF support is required for the Project to proceed.

Projects with a value over £1m will be referred up to the Board for final approval. Projects are regularly reviewed by the IAF when they are ready to proceed to the next gateway, or if the scope has changed requiring additional budget or different outputs.

3.2. Project Budget release

Before budget is released on projects the Engineer responsible for the project will complete a SF0002 Capital Scheme Approval Form, which has to be approved by the appropriate person depending on the level of expenditure. Total Budget is not necessarily released all at once.

Authorization limits

Initial, subsequent or Baseline	Head of Department	≤ £100k
	Director	≤ £1m
	Board	> £1m
Change control	Head of Department	≤ 20% of approved budget and/or ≤ £100k
	Director	≤ 20% of approved Budget and/or >£100k

3.3. Reporting of Capital Expenditure (CAPEX)

Progress on implementing the delivery plan is updated monthly by the program managers. This is reported to the relevant Director and then also to the Board.

3.4. Capitalisation Tests

When the Transaction team is capitalising a project they will look at all aspects of the project. Part of this review will be to assess if the expenditure is Capital and having some long-term economic benefit for the company. Revenue items can be filtered out and will be recoded.

On large projects the relevant project manager will review the depreciation and capitalisation of assets. Ensuring compliance with the assignment to capex categories identified in the Regulatory Accounting Guidelines.

3.5. Revenue Tests

Periodically the Financial Planning and Analysis Team will check to see if expenditure is revenue or should be classified as capital expenditure on certain cost centres. Large items of revenue expenditure will be investigated. The budget centre manages will also investigate expenditure for example repairs, which are not thought to be revenue. If such expenditure is spotted the FP&A team will liaise with the Transaction team and the relevant Department Head to identify a suitable Project they the expenditure should be coded to.

4. LABOUR, OVERHEADS AND ABSORPTION RATES

Labour and Overhead apportionment

We apportion overheads, over the assets where the cost has been incurred. Where appropriate we will use a percentage apportionment over the assets. We will match the overhead to the most appropriate asset.

4.1. Apportionment of Labour, pensions, capital salaries

Labour is capitalised via jobs in SAP on an hourly basis. Capital Salaries are capitalised on a monthly basis in SAP by an automated apportionment and manual journals. The apportionment rates from cost centres to projects are set by department Heads and the Financial Planning and Analysis team and are reviewed half yearly. Pension costs follow labour/salaries to which they relate. There are a number of different pension schemes running and overhead pension cost is dependant upon the scheme the employee is in.

4.2. Apportionment of Transport Costs

Transport costs are coded to revenue cost centres. The transport costs are then re-apportioned to the capital schemes where the existing cost centre costs have been charged.

4.3. Network Maintenance Management Charge

The Network Maintenance Management charge is the overhead charged to Bristol Water by May Gurney to cover all project management staff and costs in doing network maintenance and associated works. This work will include new water mains and service pipes and repairs. The split over revenue and capital projects is based on analysis of current year's expenditure.

4.4. Store Overhead

The stores overhead is split over revenue and capital projects based on analysis of current year's expenditure.

5. CAPITALISATION POLICY REVIEW

The Audit and Risk Committee (ARAC) considers reports from management, internal and external auditors on the system of internal control and any material control weaknesses identified. The AC will discuss with management the actions taken on any problem areas identified by Board members and management or in the internal and external auditor reports.

Periodically the Company will review its expenditure and apply the capitalisation and review tests as detailed in Section 3. Reference is also made to the Regulatory Accounting Guidelines to ensure they are still applicable. New projects also prompt this type of review and examination.

The procedures governing projects are reviewed every one to two years are as necessary.

The guidance that is in place and the internal procedures enable accurate and timely reporting of expenditure under the correct categorisation.

A new governance process to oversee capital investment is being implemented by the Chief Financial Officer, to strengthen financial controls and understanding across the company.