

NATS (EN-ROUTE) PLC SIP: INDEPENDENT REVIEWER REPORT

■
Review of NERL's engagement on its capital expenditure programme

6th September 2022

Final – sent to CAA

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SCOPE AND INTRODUCTION



SCOPE OF THE ASSESSMENT

This report provides an assessment of NERL's engagement on its capital expenditure (CAPEX) programme for the period between 1 January 2021 and 31 August 2022 for a pre-defined set of programmes and project.

SIP REQUIREMENTS

SCOPE:

A CAPEX incentive based on the quality of NERL's engagement, and actions in response to engagement was added to NERL's licence¹ in December 2020.

To support this, the CAA has asked the Independent Reviewer (IR) to assess the engagement of NERL on its CAPEX programme. It has published guidance on how this assessment (including scoring) should be conducted¹.

This report is the final scoring for the RP3 period, and covers activity from 1 January 2021 to 31 August 2022. **The scores shown reflects the average performance over the whole assessment period.**

Activity prior to 2021 is discussed but does not influence the assigned scores.

The CAA is responsible for making the final decision on NERL's performance and will take account of the findings of the IR and representations from stakeholders (including NERL) in forming their assessment.

Responsibilities of the Independent Reviewer

For each CAPEX project, the IR will advise the CAA on a score for each of the performance criteria on a scale of 1 to 5, where:

1 = Weak, 2 = Poor, 3 = Average ('baseline expectations'), 4 = Good, 5 = Excellent.

The criteria of the assessment will cover (the guidance of what constitutes each score in relation to these six categories is give in Annex F):

- 1. Timeliness** in the provision of information to users, the IR and CAA. This should include providing early warning explanation of factors that may put planned delivery timelines at risk.
- 2. User focus** in the way information is provided that reflect user priorities and resource constraints, such that it is clear and accessible.
- 3. Proportionality** in the level of substantiation NERL provides that reflects the materiality of the change under consideration.
- 4. Optioneering** of a range of different responses that might be adopted where practicable, and to provide opportunities for both user and Independent Review engagement and scrutiny of those options. This optioneering should include transparent and explicit identification of the OPEX effects that may be associated with different changes to the capex plane and different options as to how NERL might respond.
- 5. Responsiveness** of NERL's response to user, IR and CAA submissions, including how clearly it explains how it has considered and taken account of those submissions.
- 6. Mitigating and/or corrective actions** by NERL in light of user, IR and CAA submissions.

ENGAGEMENT ASSESSMENT

Following consultation with users, the CAA decided on a set of programmes and projects that should be included in the CAPEX engagement incentive assessment:

- DP En-Route and Voice
- Airspace and Ops Enhancements
- Sustainment and Surveillance
- Facilities Management (FM)
- Information Solutions (IS)
- SAIP AD6 Essex radar airspace change

We first present an overview of engagement on the entire CAPEX portfolio. Evidence of engagement, and further justification for the given score can be found in the respective annexes.

Please note – For criteria that are ***not applicable***, e.g. where there was no need in our view for optioneering during the assessment period, this criteria is not included in the overall score.

Due to a change in the scope of the Sustainment and Surveillance and Facilities Management (FM) programmes (projects being moved between the two programmes), the programmes have been assessed jointly.

The scope of the engagement incentive does not include the NR23 consultations conducted by NERL in late 2021.

References in this report will state the referenced document followed by the [Page number] or [Page number. Paragraph number].



CAPEX PROGRAMME ENGAGEMENT - ASSESSMENT RESULTS



ASSESSMENT RESULTS

A summary of the overall scoring across the assessed programmes and projects is provided below .

Programmes	Value (RP3 baseline, m£)	Weight	Timeliness	User Focus	Proportionality	Optioning	Responsiveness	Mitigating / Corrective Action	Average
DP En-Route & Voice	175.0	0.59	4	4	4	4	3	2	3.50
Airspace and OPS	31.0	0.10	4	4	4	N/A	4	3	3.80
Sustainment & Surveillance and Facilities Management	70.0	0.24	4	4	4	2	3	3	3.33
Information solutions	18.0	0.06	3	4	3	N/A	3	3	3.20
SAIP AD6	3.4 (note 1)	0.01	4	4	3	N/A	3	N/A	3.50
Average			3.80	4.00	3.60	3.00	3.20	2.75	
Total	297.4				Weighted average				3.47

Note 1: Value not disclosed. As Airspace and OPS consists of 9 programmes, the value of SAIP AD6 is assumed at 1/9th of the Airspace and OPS programme

Scores represent the average performance over the whole assessment period (Jan 21 to Aug 22)

PERFORMANCE SUMMARY

The table below presents the IR opinion on the overall performance of NERL engagement for each criteria.

Criteria	Overarching performance
Timeliness	<ul style="list-style-type: none"> • NERL’s engagement in the assessment period has demonstrated good timeliness. • Key information has been provided in a timely and proactive manner, through on-time reporting and consultation, as well as ad-hoc customer engagement meetings and pre- and post-meeting papers. • In SIP22 and iSIP22 NERL continued to report risk and milestone updates in a timely manner.
User Focus	<ul style="list-style-type: none"> • At a portfolio level, NERL has met good expectations for user focus. • The format of the SIPs has improved and in iSIP22 they provide an exhaustive and detailed view on the NERL’s investment plans. Additionally, in the SIP consultation meetings NERL now focuses on key programmes and highlights important programme changes, rather than reviewing the full draft SIP/iSIP document. This improved focus is of benefit to customers. • CAPEX programme reporting has significantly improved since SIP21. The new Quarterly Update template has improved the accessibility of key information, and the traceability of project milestones and costs. NERL took on board IR comments on how the reporting can be improved throughout (e.g. in relation to comparing progress to the most recent quarterly update). • SIP22 included further improvements to the overall presentation of milestone progress and traceability. Notably, the inclusion of the “Key Changes from the Draft SIP22 issued for consultation” is welcome. However, the traceability of reported delays and some NR23 changes to the milestones were not communicated clearly in the SIP22 document. • The iSIP22 document also benefits from comparisons to most recent quarterly updates, further improving transparency and ease of understanding progress. • TCAB meetings are a good initiative, which has been appreciated by customers, but should be further improved to ensure high-quality technology options are developed for inclusion within NERL’s future investment portfolio. • Undertaking additional, dedicated consultations where larger programme changes are planned has further improved the user focus score for NERL.
Proportionality	<ul style="list-style-type: none"> • At a portfolio level, the most significant change to the NERL CAPEX programme has been the RP3 re-plan. • Having reviewed workshop minutes, SIP21 and the SIP21 addendum, it is our opinion that there was a proportionate amount of information provided to customers to justify the changes in costs, scope and milestones of the assessed programmes, with the exception of the DP En-Route & Voice programme for which there was insufficient detail. Nonetheless in subsequent periods NERL provided more information on the progress and changes to the DP En-Route, hence demonstrating good proportionality. • In the assessment period overall, a proportionate milestone information to track the timeliness of the programmes was demonstrated.

PERFORMANCE SUMMARY

The table below presents the IR opinion on the overall performance of NERL engagement for each criteria.

Criteria	Overarching performance
Optioneering	<ul style="list-style-type: none"> Of the 5 reviewed programmes in NERL's CAPEX programme, only 2 required optioneering during the assessment period so the others are not scored. Some optioneering was conducted in TCAB/02, outside of the scope of the scored CAPEX programmes, but this only contained limited qualitative information on trade-offs, costs, benefits, risks etc. Optioneering continued during TCAB/03 – as with TCAB/02 some of the discussions were outside of the scope of the CAPEX engagement assessment. SIP22 reported further delays to multiple programme milestones, however no evidence of optioneering in the context of the required replan was demonstrated to the customers. Optioneering played a larger role in DP En-Route and voice in iSIP22, with NERL engaging with customers on the six possible options for future programme development.
Responsiveness	<ul style="list-style-type: none"> From our analysis of customer submissions NERL has responded in a timely manner to all submissions. In the majority of cases, responses to customers have been sufficiently detailed, and bilateral meetings have been regularly offered. However, the response to a customer's (July 2021) submission was insufficient. It is our expectation that NERL should acknowledge a greater proportion of the points raised in that submission, even if in agreement. NERL has demonstrated good responsiveness to IR submissions. It has responded to each submission with a dedicated document addressing the points raised. NERL has recently conducted extensive amounts of bilateral engagement beyond the scope of the CAPEX engagement activities. During the SIP22 consultation process, the level of detail provided in NERL's response to a customer's letter was not as comprehensive as expected. In the iSIP22 consultation process NERL provided prompt responses to its customers.
Mitigating / Corrective Action	<ul style="list-style-type: none"> The corrective actions taken in response to customer submissions on the draft version of SIP21, were reasonably accounted for in the final version of the SIP. For the majority of points raised in IR submissions, reasonable corrective actions were taken. If significant corrective actions have been required, then these have been highlighted to readers. If the changes have been minor, they have been simply actioned. In SIP22, there have been limited mitigation opportunities for NERL to respond to on programmes in SIP22. However, insufficient actions were documented in response to a customer's letter. In the iSIP22 consultation process we feel that NERL should have been more explicit about the mitigating actions taken, and how they have responded to submissions



ANNEX A – DP EN-ROUTE & VOICE

Programme-level engagement assessment

DP EN-ROUTE & VOICE (1)

Criteria	Evidence	IR opinion	Conclusion	Score
Timeliness	Cost bridge explanation on [27] of SIP21 and [46-48] of iSIP21.	<ul style="list-style-type: none"> NERL stated that they consulted with users on the cost bridge in 2020 which is outside the scope of this assessment. The IR view was that there was insufficient description in SIP21 and additional detail was added in iSIP21. 	<ul style="list-style-type: none"> <i>Evidence of factors that may affect delivery have been raised proactively at an early stage.</i> <i>There was good early warning of the need to significantly change the programme and an opportunity for stakeholders to engage on the choice to be made.</i> 	4
	Risk overview in "RP3 Programme updates July 2021" [16-24] of iSIP21 and SIP programme overviews in Appendix A of iSIP21.	<ul style="list-style-type: none"> There has been timely reporting of the risk increase for this programme on [17] and [28] of iSIP21. Despite the risk not yet materialising, users have been made aware of this changing risk profile. 		
	SIP22 and iSIP22	<ul style="list-style-type: none"> In SIP22, NERL continued to report risk and milestone updates in a timely manner. This has been further achieved through the dedicated additional consultation meeting held with the stakeholders in June 2022. In particular, the need for significant changes required to the programme were communicated early and stakeholders were made aware of the process required to re-orientate the programme. 		

DP EN-ROUTE & VOICE (2)

Criteria	Evidence	IR opinion	Conclusion	Score
User Focus	SIP21 "Deploying SESAR" section [22-27].	<ul style="list-style-type: none"> SIP21 provides an overview of the post-COVID plan for this programme. This section is text dense, and contains a significant number of technical acronyms, especially on [25]. Given the large scale of change in this programme, in both scope and cost, this demonstrates poor user focus. The formatting and language has improved in subsequent publications. 	<ul style="list-style-type: none"> SIP21 performs poorly in terms of user focus, and the information provided is insufficient to justify the significant cost increase for this programme. In the subsequent reporting, and associated consultation process, there has been a noticeable effort to improve the accessibility of key information to users. In SIP22 Considerable progress has been made in terms of user focus on the presentation and traceability to RP3 baselines, however the further milestone delays are not clearly presented. The additional dedicated user consultation which took place in June 2022 showed increased user-focus, aimed at ensuring that future planning is aligned to user requirements. This behaviour has increased the score for user-focus from 3 to 4. 	4
	Appendix C of iSIP21 provides an overview of the evolution of the DP En-Route & Voice programme. Section 2.2 of SIP21 Addendum provides a comparison of milestones back to SIP21.	<ul style="list-style-type: none"> Although the presentation of milestones is sufficient to track the progress of programmes in SIP21, there are a number of inconsistencies in milestone naming and a lack of traceability back to the original programme plan set out in the RP3 rBP (2018). There has been a notable effort to improve the traceability of programme milestones and the scope of the programme through the accompanying evidence. 		
	Revised upper limit of probabilistic forecast presented in the Appendix C of iSIP21 [49].	<ul style="list-style-type: none"> Although <10% of the overall programme value, the £10m increase in the upper probabilistic forecast for this programme is not well signposted within iSIP21, as noted in the IR review of iSIP21. 		
	SIP consultation, Technical Delivery Workshop and TCAB slides and minutes.	<ul style="list-style-type: none"> Review of other meeting slides and minutes show that users are regularly invited to provide feedback on this programme. 		
	SIP22	<ul style="list-style-type: none"> SIP22 [22, 23] included improvements to the overall presentation of milestone progress and traceability to the original programme plan (RP3 baseline). Notably, the inclusion of the "Key Changes from the Draft SIP22 issued for consultation" section is an improvement. However, the traceability of (sometimes considerable) delays incurred since the previous quarterly SIP on milestones 2, 5, 6, 7 and 8 could have been improved. 		
iSIP22	<ul style="list-style-type: none"> iSIP22 includes extensive information on the progress of DP en-route and voice in the overview section in [16] – [23]. The information contained in this section builds on the additional dedicated stakeholder consultation which took place in June 2022. This consultation has been an opportunity to better address user concerns and understand their priorities. NERL also held a consultation meeting with one stakeholder to discuss the changes and provided two written responses to stakeholders. 			

DP EN-ROUTE & VOICE (3)

Criteria	Evidence	IR opinion	Conclusion	Score
Proportionality	Programme cost bridge discussion on [27] and Appendix D of SIP21, and Appendix C of iSIP21.	<ul style="list-style-type: none"> The presentation of the cost bridge in SIP21 [27] provides insufficient detail to justify the change in cost for the programme. NERL has justified this by stating that it consulted with stakeholders in 2020 on the cost bridge. This is outside the scope of our assessment which starts in 2021. In iSIP21, there is greater detail on each element of the cost bridge. Based on the discussions at the iSIP21 consultation, and the subsequent submission from a customer, it is clear that the cost bridge requires further explanation to users. 	<ul style="list-style-type: none"> The SIP21 document had insufficient detail on the cost bridge which was addressed in iSIP21. NERL explained this by stating that it has consulted in 2020 with users on this topic. The further delays incurred and overall delay status on the programme were not proportionately represented in the report wording in SIP22. The additional consultation meeting held in June 2022 contributed very well to the level of involvement of stakeholders in the shaping of this crucial programme. NERL also encouraged and held an additional stakeholder consultation meeting on the changes. Overall in aggregate over the assessment period, NERL provided good substantiation for all material changes to the programme. Particularly in 2022, there was a strong effort to make sure that customers were informed and aware of changes to plans. 	4
	SIP21 [31] milestone summary, Quarterly Dashboard, App C iSIP21 and Section 2.2 of SIP21 Addendum.	<ul style="list-style-type: none"> In line with the findings of the IR review of SIP21, there has continued to be proportionate milestone information to track the timeliness of this programme. This has been aided by the inclusion of an overview of how the milestones have evolved between SIP21 and the SIP21 Addendum, and between the new and original RP3 baseline presented in the rBP in 2018 (see Appendix C of iSIP21 and Section 2.2 of SIP21 Addendum). 		
	SIP22	<ul style="list-style-type: none"> In SIP22 there was, overall, proportionate milestone information to track the progress of this programme. However, the quote in "Progress last quarter" review on [22] referring to red RAG status "remains, primarily due to previously reported schedule challenges" does not proportionately represent the extent of further delays (incurred since previous quarterly SIP). 		
	iSIP22	<ul style="list-style-type: none"> In iSIP22 we have observed a continued proportional level of milestone information to track the progress of the programme. Additional information was reported in the dedicated consultation and subsequently in the overview section in [16] – [23]. Having said this, [27] states that "The reason for a 'red' RAG status remains". We find that this reason is not sufficiently well explained on the page in question. 		

DP EN-ROUTE & VOICE (4)

Criteria	Evidence	IR opinion	Conclusion	Score
Optioneering	<p>Six options were presented to users for the RP3 re-plan of this programme.</p> <p>Optioneering was held at the Technical Delivery workshop and SIP21 consultation (evidenced by the respective minutes on the customer portal)</p> <p>The summary of the optioneering for the post-COVID plan for DP En-Route & Voice provided on [24-25] of SIP21.</p>	<ul style="list-style-type: none"> This optioneering was largely conducted in 2020 and therefore outside the scope of the assessment. Users were given reasonable opportunity to engage meaningfully on these options. However, from the minutes of the Technical Delivery Workshop, and SIP consultations it appears there was limited engagement on deciding the options themselves. The short-list of meaningful options are clearly summarised in SIP21. However, there is no record explicit discussions of the OPEX relating to the six options presented. 	<ul style="list-style-type: none"> There has been no requirement for meaningful optioneering in 2021. For the optioneering of the DP En-Route and Voice re-plan, a suitable process was adhered to in 2020 regarding engagement and communication. However, the process appeared to lack key details such as OPEX interactions for the options presented. There is no evidence of different options being considered as a result of the increasing programme delays in SIP22. In the period to the run up of iSIP22, NERL engaged with users in a dedicated workshop to discuss six distinct options on how to take forward the DP en-route programme. The options were well defined and presented clearly. In order to reach a score of 5, we would expect to see more detailed and quantified information on the risks, costs, benefits and delivery schedules of the six options. 	4
	SIP22	<ul style="list-style-type: none"> Despite the further delays reported in SIP22 [22, 23], the document does not provide any evidence of different options/outcomes being considered versus the delay scenario (e.g. increased OPEX in an attempt to reduce delay etc.). 		
	iSIP22	<ul style="list-style-type: none"> In the period in the run up to iSIP22, NERL has focused on engaging with stakeholders to jointly define the way forward on the DP en-route programme. This included discussing a series of options which could be considered. These options have also been summarised in the iSIP in the overview section in [16] to [23]. This optioneering has been a welcome addition. Going forward though, we would welcome there being more detailed information on the risks, costs, benefits and delivery schedules than the high level matrix presented on [19] of iSIP22. 		

DP EN-ROUTE & VOICE (5)

Criteria	Evidence	IR opinion	Conclusion	Score
Responsiveness	NERL responses to IR report drafts for SIP21, SIP21 Addendum, Quarterly Review and iSIP21 reports (not publicly available).	<ul style="list-style-type: none"> NERL has responded to points raised by the IR, informing the IR of their opinion on each point raised, and including any planned next steps, if applicable. <ul style="list-style-type: none"> For example, NERL offered the IR the opportunity to partake in a specific workshop to greater understand the elements of the cost bridge following the IR SIP21 review. 	<ul style="list-style-type: none"> NERL has responded to all user and IR submissions related to this programme and offered additional bilateral discussions/workshops to the IR and stakeholders. The response provided by NERL in response to draft SIP22 remarks could have provided more detail around tangible impacts and the thought process behind the decision to report delays. NERL undertook a range of actions to engage with customers in a timely manner. 	3
	Requests for bilateral meetings on the evolution of the DP En-Route and Voice Programme, evidenced in iSIP21 consultation minutes (IATA), customer submission on NERL customer portal and [3] of iSIP21.	<ul style="list-style-type: none"> The bilateral meetings to further discuss this programme were coordinated in a timely manner by NERL. 		
	Customer response to NERL Draft SIP22 and NERL's subsequent response.	<ul style="list-style-type: none"> During the SIP22 consultation process, NERL received and responded to a specific customer's post consultation letter in a timely manner. 		
	Customer / NATS DP En-Route & Voice Bilateral, 14th June 2022 meeting minute; Customers' email dated 17th June 2022 and response dated 12th August 2022	<ul style="list-style-type: none"> NERL undertook a dedicated consultation session and held a follow up session with an airline to further discuss their questions. The meeting was held only four days after the general consultation, showing that NERL was very responsive in making the team available to discuss issues further with the customers. In addition to the meeting, the customer sent a written email summarising their views (dated 17th June) and NERL provided written minutes and a detailed letter response (dated 12th August). During the bilateral exchange between NERL and the Independent Reviewer NERL confirmed that additional verbal exchanges with the customer took place between the 17th of June and 12th of August. 		

DP EN-ROUTE & VOICE (6)

Criteria	Evidence	IR opinion	Conclusion	Score
Mitigating / Corrective Actions	<p>"Key changes since Draft for customer consultation" summarises any mitigating / corrective actions in response to user submissions ([3.1] of iSIP21 & [3] of SIP21).</p>	<ul style="list-style-type: none"> Although no mitigating / corrective actions required in response to user submissions for iSIP21, the framework is in place for communication of these actions in future reporting. Satisfactory mitigating actions taken following customer consultation of SIP21. 	<ul style="list-style-type: none"> No mitigating / corrective actions required from user submissions for iSIP21, however, the changes to SIP21 following customer consultation are in line with baseline expectations. IR submissions have been reasonably accounted in 2021. Adequate corrective actions were not identified in response to all of the customer feedback on the draft SIP22. In the recent period, the responsiveness to the concerns raised by stakeholders fell short of the expected standard. 	2
	<p>Examples of corrective actions in response to points raised IR reports:</p> <ul style="list-style-type: none"> Appendix C presents the evolution of this programme from the RP3 rBP and the latest baseline presented in the SIP21 Addendum. Probabilistic forecasting advice being sought for determination of the cost of the DP En-Route & Voice programme (iSIP21 [50]). Re-introduction of the Quarterly Dashboard in the Quarterly updates. 	<ul style="list-style-type: none"> The points raised by the IR are given different treatment to those raised in user submissions. The most significant changes prompted by the IR review are highlighted in the text. <ul style="list-style-type: none"> For example, the IR request for <i>'further traceability of our new plan with our original plan set out in October'</i> has been highlighted in the Executive Summary [5], and actioned with the inclusion of Appendix C in iSIP21. However, more minor corrective actions emanating from the SIP21 IR review are simply actioned without reference to the IR. <ul style="list-style-type: none"> For example, the separation of 'static' programme information and key cost and milestone information in the SIP to improve the accessibility of key information to readers. We believe this is a acceptable manner in which to respond to IR recommendations. 		
	<p>Customer response to NERL Draft SIP22, NERL's subsequent response, "LTIP Programme overviews" for DP ER on [35].</p>	<ul style="list-style-type: none"> NERL has been appropriately responsive to the feedback provided by the IR and CAA. The customer's post consultation letter, referred to above, raised a number of specific points, on topics such as the delay to SVS/MVS, accelerating the MVS FOS milestone, changes to the 3Di metric and engaging on the Simulation Transformation and sustainment programme. However, no actions were identified for most of these points. 		
	<p>Customer / NATS DP En-Route & Voice Bilateral, 14th June 2022 meeting minute; Customers' email dated 17th June 2022 and response dated 12th August 2022</p>	<ul style="list-style-type: none"> In the email dated 17th June, the customer stated <i>"we are keen to understand the quantifiable impacts for the options presented to be able to judge our preferred path. Examples, not exhaustive, of our thoughts on this are: timescale implication on the remaining workstreams in the program, cost and benefit impacts, implication on ATCO etc availability to support service performance. As a result, we would find it challenging to identify a preferred option for progressing the programme without further information"</i>. In its 12th August response, NERL stated: <i>"Optioneering was conducted at a very high level only, considering the relative merits of each factor in order to avoid nugatory effort in cost estimation whilst providing sufficient direction to support the development of a detailed plan. (...) Given our recommendation to continue with this simplified option and to hold dates as best we can it would be counter-productive (...) to go back and conduct further detailed planning on the other options"</i>. While we appreciate that detailed studies require effort, the request from the customer is not unreasonable given the magnitude of the programme and importance to the discussions held. 		



ANNEX B - AIRSPACE & OPS ENHANCEMENT

Programme-level engagement assessment

AIRSPACE & OPS ENHANCEMENT (1)

Criteria	Evidence	IR opinion	Conclusion	Score
Timeliness	<p>Communication of factors that may influence delivery:</p> <ul style="list-style-type: none"> “Key changes since Draft for customer consultation” section iSIP21 [3.2] – Launch UK impact. Programme risk and dependency communication iSIP21 [29]. 	<ul style="list-style-type: none"> Users have received timely notification of the key programme risk and associated dependencies that may lead to delay and increased cost. Stakeholders have also been notified of the ongoing mitigation of these potential risks to provide assurance of the timeliness of this programme. 	<ul style="list-style-type: none"> The revised quarterly SIP update format has established a good framework through which to communicate any possible impact on the programme delivery at an early stage to the customer, as demonstrated with the evidence for this criterion. 	4
	iSIP22 and SIP22	<ul style="list-style-type: none"> In SIP22 [22] and iSIP22 [29], NERL continued to report risk and milestone updates in a timely manner. 		
User Focus	Airspace and Ops Enhancement “RP3 programme updates July 2021” in iSIP21 [18] and the comparable slide in Quarterly update.	<ul style="list-style-type: none"> iSIP21 [18] provides an overview of the key information users are interested in, including costs, milestones, and programme progress. As noted in the iSIP21 review, however, this section is text dense, and therefore users may struggle to extract the key pieces of information relevant to them. 	<ul style="list-style-type: none"> The reporting for this programme provides reasonably clear and accessible information, with marked improvements since SIP21. 	4
	Appendix B – RP3 rBP alignment to SIP21 addendum RP3 baseline iSIP21 [36].	<ul style="list-style-type: none"> [36.3] of iSIP21 provides a clear statement of how the scope of the Airspace programme has now been redefined to “utilise specific elements from the previous programme” to be known as Airspace and Ops enhancements. The programme name changed in the SIP21 Addendum, which preceded iSIP21 publication. This explanation should have accompanied the name change in the SIP21 Addendum. 	<ul style="list-style-type: none"> A number of changes to the milestones have been introduced as part of the NR23 consultation process. While the changes are appropriate, some aspects of their presentation in the SIP22 document has been confusing. 	
	SIP22	<ul style="list-style-type: none"> In SIP22 it is difficult to map some of the statements on [24] to the impact on milestones on [25], notably around the risk of airports not being able to continue with airspace development and the lookahead on TMA network definition. In addition, on [25] the traceability of delays incurred for milestone 4 since the previous quarterly SIP could be improved. The numbering of milestones on [25] has changed since the previous quarterly SIP. While we recognise this was consulted upon in the NR23 consultation, the presentation of the changes could be clearer. Notably, the list excludes milestone 7 and milestone 9 (previously “Manchester TMA Airspace Changes FOS”) has changed. Given the importance of the FAS1 programme to airspace users, it would be expected to include milestone(s) related to TMA network definition in future SIPs. 	<ul style="list-style-type: none"> iSIP22 is a strong update in the ‘one pager’ format and includes additional information on enabled CO2 benefits which is welcome. 	
	iSIP22	<ul style="list-style-type: none"> In the iSIP22 NERL continued providing good and regular updates, with costs and milestones looking to be on track when compared to the previous quarterly update. The iSIP includes addition information on the enabled CO2 benefits. Having said that the project status has deteriorated from a green status to amber and it would be valuable to explain the reasons for this deterioration. 		

AIRSPACE & OPS ENHANCEMENT (2)

Criteria	Evidence	IR opinion	Conclusion	Score
Proportionality	Description of revised Airspace plan proposal process SIP21 [17-18], Key features of Proposed RP3 plan and its investments and rationales Appendix B SIP21.	<ul style="list-style-type: none"> The amount of detail provided in the reporting in 2021 is proportionate to the status of the programme. <ul style="list-style-type: none"> For example, the publication of SIP21 followed a period of consultation on the RP3 re-plan. With such significant changes being proposed in SIP21, it is proportionate for extensive benefits and rationale for each investment to be communicated in SIP21 Appendix B. This is in contrast to iSIP21, which describes the implementation phase of the programme. Therefore there is a strong focus on key milestones, project progress and cost information, which will be of interest to users. 	<ul style="list-style-type: none"> There is sufficient substantiation provided for all material changes in the airspace programme. In particular, the level of detail is adapted depending on the implementation status of the project. 	4
	SIP22	<ul style="list-style-type: none"> In SIP22 [24-25], there was overall proportionate milestone information to track the timeliness of this programme. 		
	iSIP22	<ul style="list-style-type: none"> As in SIP22, iSIP22 [29-30] provides proportionate milestone information to track the timeliness of this programme. On this occasion, the key missing element is the explanation of the reason for RAG status deterioration. 		
Optioneering	Optioneering took place during the RP3 re-plan for this programme.	<ul style="list-style-type: none"> SIP21 summarises the outcomes of NERL's prioritisation process in relation to the Airspace programme re-plan. There are no explicit OPEX interactions described within SIP21 in relation to the proposed options. From a review of optioneering in 2020 documents, it appears that only one 'option' was presented, i.e. the proposed solution based on options presented to customers at the Customer Workshop in 2020 on "an analysis of the benefit areas on which we (NERL) are assessed" [17.6]. Limited information on other options were provided, instead users were offered an opportunity to provide feedback on whether any other projects should be prioritised or not. There was no information to explain OPEX or benefits consequences. 	<ul style="list-style-type: none"> There was no requirement for meaningful optioneering in the assessment period, with all of the optioneering activities having taken place in 2020. 	N/A
	NATS proposed a revised project portfolio based by benefit category and estimated cost. At a customer workshop, and through subsequent submissions, customers were then invited to review the proposal and comment whether they thought the correct objects were being prioritised.			
	The outcomes of this optioneering process were summarised on [17-18] SIP21.			
	SIP22 and iSIP22	<ul style="list-style-type: none"> Since January 2021 only one RP3 Airspace & Ops milestone has been delayed. As such, there has been no need for optioneering for the programme. 		

AIRSPACE & OPS ENHANCEMENT (3)

Criteria	Evidence	IR opinion	Conclusion	Score
Responsiveness	Customer Feedback from Airspace Investment Options Workshop and SIP21 consultation (as listed on NERL customer portal).	<ul style="list-style-type: none"> SIP21 consultation submissions related to airspace, are met with a timely and proportionate individual response by NERL. This trend of individual stakeholder responses is not extended to the five submissions received in response to the Airspace Investment Options Workshop. The outcomes of these submissions and workshop discussions are summarised within SIP21 [17-18]. 	<ul style="list-style-type: none"> There has been good responsiveness to all user and IR submissions in the assessment period. Prior to the assessment period, it appears that not all individual responses were acknowledged. 	4
	Response to IR report drafts for SIP21, SIP21 Addendum, Quarterly Review and iSIP21 reports (not publicly available).	<ul style="list-style-type: none"> As with the other programmes, NERL has been responsive to IR comments relating to the Airspace programme through their dedicated document that responds to the majority of IR comments on the SIP reporting. 		
		<ul style="list-style-type: none"> NERL has provided evidence that it has recently conducted considerable engagement (e.g. airspace change, COVID recovery planning etc.) beyond the scope of the CAPEX engagement incentive. 		
	Letter from LHR dated 11 th July 2022 and subsequent response from NERL dated 18 th July	<ul style="list-style-type: none"> NERL has been prompt in providing a response to the comments on the airspace programme provided by Heathrow Airport 		
Mitigating / Corrective Actions	"Key changes since Draft for customer consultation" provides the mitigating actions in response to user submissions ([3] of iSIP21 & [3.3] of SIP21).	<ul style="list-style-type: none"> In light of user submissions on the draft SIP21, NERL has continued to update users on their work with ACOG in reporting in 2021. This represents clear communication of the corrective action being taken to align airspace changes 	<ul style="list-style-type: none"> NERL has met our baseline expectations regarding corrective actions in response to user submissions. The minor points raised in the IR review of SIP21 have been reasonably accounted for. 	3
	Example of corrective actions in response to IR reports: <ul style="list-style-type: none"> Improved consistency in naming of airspace milestones from SIP21 Addendum onwards. 	<ul style="list-style-type: none"> Only minor points were raised regarding the Airspace programme in IR reports. For example, ensuring consistency with the naming conventions for Airspace milestones. This has been definitively addressed with a comparison table of the evolution of the programme between SIP21 and SIP Addendum [8] of SIP Addendum, and between the SIP Addendum and the RP3 rBP (Appendix B of iSIP21). 		
	SIP22 and iSIP22	<ul style="list-style-type: none"> There have been no specific mitigation opportunities for NERL to respond to in the Airspace programme in the assessment period. 		



ANNEX C - SUSTAINMENT & SURVEILLANCE AND FACILITIES MANAGEMENT



Programme-level engagement assessment

SUSTAINMENT & SURVEILLANCE AND FACILITIES MANAGEMENT (1)

Criteria	Evidence	IR opinion	Conclusion	Score
Timeliness	Milestone status update "DVOR replacement (Wick & Tiree)" and "NODE Core replacement Ready for FOS" (iSIP21 [19] and SIP22 [27]).	<ul style="list-style-type: none"> Early warning has been provided to users of potential delays to these milestones, which are sufficiently justified within iSIP21. 	<ul style="list-style-type: none"> The reporting and associated customer engagement shows proactive timeliness throughout 2021 regarding factors that may affect programme delivery and scope change, in accordance with the scoring criteria table (Appendix A). For all the material changes relating to the FM programme there has been proactive notification and warning given to users. 	4
	Communication of draft proposal to transfer Facilities Management scope into the Sustainment & Surveillance programme (iSIP21 [3.3]).	<ul style="list-style-type: none"> The evidenced section of iSIP21 provides timely warning of the proposal to transfer scope from the FM programme to the Sustainment and Surveillance, and the reason for this. 		
	Communication to TCAB members (01/09/21) containing "NATS Sustainment Programme Update CY22"	<ul style="list-style-type: none"> Distribution of this document 1 week ahead of the TCAB advisory board meeting (08/09/21), alongside other meeting input papers, represents good user focus. The distribution allowed users ample time to examine the document and subsequently enabling informed discussion at the September TCAB meeting 		
	Examples of communication of factors influencing delay: <ul style="list-style-type: none"> Milestone status update (iSIP21 [20] for milestones "Swanwick UPS replacement" and "Tiree Radome replacement". Progress since last quarter iSIP21 [20] – changing risk profiles. 	<ul style="list-style-type: none"> There has been timely provision of early warning regarding the potential slipping of these evidenced milestones, and explanation of RP3 cost forecast increases for this programme. 		
	Communication to TCAB members (01/09/21) containing "NATS Sustainment Programme Update CY22", and Communication of draft proposal to transfer Facilities Management scope into the Sustainment & Surveillance programme (iSIP21 [3.3]).	<ul style="list-style-type: none"> There has been timely notification to users of the material change of transferring the scope of the FM programme into the Sustainment and Surveillance Programme. Early warning was given in iSIP21, and this was followed with a more detailed proposal of the scope change at the start of September 2021. 		
	SIP22 and iSIP22	<ul style="list-style-type: none"> In SIP22 [22] and iSIP22 [24], NERL continued to report risk and milestone updates in a timely manner. 		

SUSTAINMENT & SURVEILLANCE AND FACILITIES MANAGEMENT (2)

Criteria	Evidence	IR opinion	Conclusion	Score
User Focus	Communication to TCAB members (01/09/21) containing "NATS Sustainment Programme Update CY22" TCAB input paper.	<ul style="list-style-type: none"> This paper refers to the programme as the Technical Sustainment and Surveillance programme, a name that was used in SIP21 and then dropped in the SIP21 Addendum. Greater consistency should be sought in regards to programme naming, to ensure users do not misinterpret this programme name change as a potential change in scope. 	<ul style="list-style-type: none"> Since SIP21 Addendum the basic milestone and cost reporting relating to this programme has significantly improved in its user focus. There are however, areas where consistency needs to be improved to enable this score to increase. Given the relatively low strategic importance of this programme to users, it is our opinion that NERL has showed user focus that aligns with our baseline expectations. NERL used TCAB/03 for a good discussion on surveillance matters. 	4
	"NATS Sustainment Programme Update CY22" – September TCAB input paper	<ul style="list-style-type: none"> The TCAB input paper's main aim is to "offer customers the opportunity to clarify and common on our (NERL's) technical sustainment approach", it is our opinion that this document serves this purpose and therefore demonstrates reasonable user focus. 		
	SIP22	<ul style="list-style-type: none"> NERL continued to report risk and milestone updates in a timely manner, although the change in numbering of milestones in SIP22 [27] was not well explained. 		
	TCAB/03	<ul style="list-style-type: none"> A good discussion on the introduction of TMZs was held during TCAB/03, reflecting the interests and focus of customers 		
	iSIP22	<ul style="list-style-type: none"> NERL continued to report risk and milestone updates in a timely manner, with no major changes reported. 		

SUSTAINMENT & SURVEILLANCE AND FACILITIES MANAGEMENT (3)

Criteria	Evidence	IR opinion	Conclusion	Score
Proportionality	"NATS Sustainment Programme Update CY22" – September TCAB input paper and NERL Surveillance Service Update – February 2022 TCAB input paper	<ul style="list-style-type: none"> The primary material change in relation to the Sustainment and Surveillance programme is the integration of the Facilities Management programme scope into the Sustainment and Surveillance programme. The paper provides a proportionate amount of detail on the proposed new priorities of the programme, alongside milestone information. The February paper provides good early information on future investment possibilities 	<ul style="list-style-type: none"> The evidence raised in this criterion demonstrates good proportionality relative to the scale of the change in the programme, as evidenced in this report. Furthermore, NERL's response is considerate of the sensitivity of this programme to customers, yielding a 'good' score for this criterion. The evidence raised in this criterion demonstrates reasonable proportionality in relation to the materiality of the change being undertaken. The two pieces of evidence demonstrate a proportional response to a large and small change in relation to this programme. 	4
	Programme milestone status table iSIP21 [19].	<ul style="list-style-type: none"> The accompanying justification of the "NODE Core replacement FOS" milestone confirmation is proportional. 		
	"NATS Sustainment Programme Update CY22" – September 2022 TCAB input paper	<ul style="list-style-type: none"> The primary material change in relation to the Facilities Management, is its integration into the Sustainment and Surveillance programme. The paper provides a proportionate amount of detail on the proposed new priorities of the programme, alongside milestone information. 		
	Programme milestone status table iSIP21 [19] – "NODE Core replacement FOS"	<ul style="list-style-type: none"> The proportionality of the accompanying milestone confirmation of the "NODE Core replacement FOS", is also appropriate. The short one sentence provides users with an understanding of what has occurred to confirm this milestone 		
	SIP22 [26-28] and iSIP22 [31-33] update	<ul style="list-style-type: none"> In SIP22 and iSIP22 there was proportionate milestone information to track the timeliness of this programme. 		

SUSTAINMENT & SURVEILLANCE AND FACILITIES MANAGEMENT (4)

Criteria	Evidence	IR opinion	Conclusion	Score
Optioneering	SIP21	<ul style="list-style-type: none"> No options were presented in relation to this programme. Although there has been material change in relation to the FM integration, it is our opinion that this did not necessitate the presentation of options. 	<ul style="list-style-type: none"> Optioneering on surveillance at TCAB/03 had too little information to enable meaningful engagement. 	2
	SIP22	<ul style="list-style-type: none"> Despite the further delays reported in SIP22 [26, 27], the document does not provide any evidence of different options/outcomes being considered versus the delay scenario (e.g. increased OPEX in an attempt to reduce delay etc.). 		
	TCAB/03 input paper #3	<ul style="list-style-type: none"> The NERL Surveillance Service Update paper provided information on the three surveillance options. While the presentation of options is welcome, the paper does not adequately present the costs and benefits of the options (e.g. only stating that elements "are very cost effective" and "comparatively low risk without further quantification and more specific information). Customers are asked to endorse one of the options. 		
	iSIP22	<ul style="list-style-type: none"> No significant changes to the programme have been reported in iSIP22, hence there has been no additional optioneering for the programme. 		
Responsiveness	MAG submission regarding clarification on DVOR removal.	<ul style="list-style-type: none"> NERL responded to MAG regarding their request to further engage on DVOR removal, with an proportionately detailed response. 	<ul style="list-style-type: none"> As has been the framework for other programmes, there have been timely and proportionate responses to user and IR submissions. These are consistent with baseline expectations. No other user submissions received. Reasonable responsiveness to IR submissions explaining the mitigative actions that would be taken. 	3
	"IR review of iSIP21 – NERL response" [2] – Sustainment and Surveillance (not publicly available).	<ul style="list-style-type: none"> This document demonstrates the due consideration being taken regarding the points raised in the iSIP21 IR review in relation to this programme. 		
	SIP21 IR review report [8] – NERL response (Not publicly available).	<ul style="list-style-type: none"> NERL provided a reasonable response to two points from the IR review of SIP21 relating to a potential budget discrepancy and inconsistencies in the naming of the FM programme. The response clearly explained that there was an error in the presentation of the information, and the action that would be taken to avoid this error from occurring again. 		
		<ul style="list-style-type: none"> NERL has recently conducted considerable engagement (e.g. airspace change, COVID recovery planning etc.) beyond the scope of the CAPEX engagement incentive. 		

SUSTAINMENT & SURVEILLANCE AND FACILITIES MANAGEMENT (5)

Criteria	Evidence	IR opinion	Conclusion	Score
Mitigating / Corrective Actions	IR review report of SIP21 [7]	<ul style="list-style-type: none"> There have been minimal corrective actions required in relation to the Sustainment and Surveillance programme. Those raised in IR review of SIP21, have been addressed in the new SIP Quarterly Update format, enabling clear identification of milestone and cost information. 	<ul style="list-style-type: none"> The minor points raised in the IR review of SIP21 have been reasonably accounted for. There have been no user submissions necessitating corrective actions in 2021. Proposed corrective actions are proportionate to the points raised in IR review. However, in the case of the proposed financial check, this is undermined by continuing inconsistencies in the presentation of financial data. 	3
	Appendix B of iSIP21 and iSIP21 [15], [20], and [25].	<ul style="list-style-type: none"> Appendix B, provides clear traceability of how the programme has evolved since the RP3 rBP baseline. In NERL's response to the IR review related to this financial discrepancy, however, they state that there will be a "dedicated check for financial correctness" before future SIP releases. This dedicated check has improved the accuracy of the financial information, however, a small number of inconsistencies in the presentation of financial information were still found in iSIP21. As noted in the IR review of iSIP21 one was found in the FM programme reporting. 		
	SIP22 and iSIP22	<ul style="list-style-type: none"> There have been no specific mitigation opportunities for NERL to respond to on this programme in SIP22 or iSIP22. 		



ANNEX D - INFORMATION SOLUTIONS

Programme-level engagement assessment

INFORMATION SOLUTIONS (1)

Criteria	Evidence	IR opinion	Conclusion	Score
Timeliness	Milestone summary SIP21 [30], SIP22 [12] and iSIP22 [24]	<ul style="list-style-type: none"> The framework for displaying milestones in SIP21, and the subsequent quarterly updates has been enabled through the re-introduction of the quarterly dashboard and are suitable for providing timely assurance that the IS programme is on track. 	<ul style="list-style-type: none"> A suitable framework is in place for timely communication of any material changes to the IS programme. 	3
User Focus	IR review report of SIP21 and subsequent reporting.	<ul style="list-style-type: none"> In the IR review report of SIP21, it was noted that the IS milestones SIP21 [41] did not align with the Key Deliveries from SIP21 [65]. The reporting of milestone, cost, risk and benefit information in relation to IS since SIP21 has much improved in terms of consistency and traceability, with key information for readers readily accessible in the revised format. Transparency was maintained in the subsequent SIPs. The format of the iSIP22 report for this and other programmes is good and allows the reader to understand well how the programmes are progressing and the key issues of milestones, budget and risk. 	<ul style="list-style-type: none"> Inaccuracies were present in SIP21 but since there has been good user focus in reporting. 	4
Proportionality	SIP21 IR review report, and subsequent reporting in 2021 and 2022.	<ul style="list-style-type: none"> As noted in the SIP21 IR review, SIP21 provides a proportionate level of detail on the IS programme in relation to the size of the programme. This has continued throughout 2021 and 2022. 	<ul style="list-style-type: none"> There have been no material changes during the assessment period in relation to this programme. However, the level of detail provided in relation to the key cost and milestones meets baseline expectations. 	3
	SIP22 reporting	<ul style="list-style-type: none"> In SIP22 [20], the IS programme has been marked as <i>amber</i>, but the explanation for this change has not been provided (all milestones were on track, costs have not increased and the update on [29] states that <i>there is no material change to the risks</i>). 		
Optioneering	<i>Not applicable</i>	<ul style="list-style-type: none"> No optioneering took place during the assessment period. It is our opinion that the IS programme did not require optioneering during this period due to the lack of material changes to the programme. 	<ul style="list-style-type: none"> <i>Not applicable</i> 	N/A

INFORMATION SOLUTIONS (2)

Criteria	Evidence	IR opinion	Conclusion	Score
Responsiveness	SIP21 IR review report [9] – NERL response (not publicly available)	<ul style="list-style-type: none"> There have been no user submissions to respond to in relation to the IS programme. In the SIP21 IR report, NERL responded appropriately to a comment regarding the misalignment between Key Deliveries and milestones for the IS programme. 	<ul style="list-style-type: none"> <i>No user submissions received. However, constructive responses provided to IR submissions.</i> 	3
Mitigating / Corrective Actions	SIP21 Addendum [12-13]	<ul style="list-style-type: none"> The re-baselining of the IS programme in SIP21 Addendum addresses the misalignment referred to in the Responsiveness IR opinion above. No other mitigative or corrective actions were required beyond the SIP21 Addendum. 	<ul style="list-style-type: none"> <i>Although minor, the corrective action applied to address the IR comment was reasonable.</i> 	3



ANNEX E - SAIP AD6 ESSEX AIRSPACE CHANGE

Programme-level engagement assessment

SAIP AD6 (1)

Criteria	Evidence	IR opinion	Conclusion	Score
Timeliness	Executive Summary [4] of SIP21, [5] in SIP22 and iSIP22 [4]	<ul style="list-style-type: none"> SAIP AD6 is referenced regularly throughout the reporting cycle and can be easily tracked in the Airspace and OPS milestone presentation. 	<ul style="list-style-type: none"> Information has been provided proactively and promptly regarding potential changes in risk profiles. Other milestone information is easily accessible to allow tracking of the project. 	4
	Programme Risk – [8] of SIP21 Addendum and SIP21 [45]	<ul style="list-style-type: none"> There is proactive engagement with users regarding the early warning of the Secretary of State call in of the SAIP AD6 ACP, which could potentially lead to delay. 		
User Focus	IR review report of SIP21 and subsequent reporting.	<ul style="list-style-type: none"> Given the strategic importance of the programme to users, and the proximity to delivery, relevant information on project progress is accessible to users. 	<ul style="list-style-type: none"> The evidence presented in this report demonstrates a good regard for user priorities and resource constraints, including several bilateral meetings. 	4
	Airspace Investment Option Workshop slides and minutes and NERL Customer Portal AD6 page.	<ul style="list-style-type: none"> Prior to the assessment period, a major focus of the Airspace Investment Option Workshop was SAIP AD6, representing sensitivity to the strategic importance of this programme to users. NERL has also informed us that 2 bilateral meetings were held with LLA and EasyJet at the beginning of 2021, and an extensive public consultation process held between October 2020 and February 2021, the material from which is available on the dedicated web page. (Note the engagement prior to 2021 is outside the scope of this assessment.) 		

SAIP AD6 (2)

Criteria	Evidence	IR opinion	Conclusion	Score
Proportionality	SIP reporting in 2021 and 2022	<ul style="list-style-type: none"> There has been no material change during 2021 and 2022 in relation to this project. Building on the IR opinion – User Focus in the preceding slide, the level of detail provided is the reporting is proportionate to the strategic importance of the project. 	<ul style="list-style-type: none"> Information available in SIP reporting reasonably reflects the strategic importance of the programme to users. 	3
Optioneering	<i>Not applicable</i>	<ul style="list-style-type: none"> No options were presented in relation to this programme during the assessment period. It is our opinion that during the period there was no need for the presentation of meaningful options. 	<ul style="list-style-type: none"> <i>Not applicable</i> 	N/A
Responsiveness	Step 3D Consultation Feedback Report	<ul style="list-style-type: none"> In line with Step 3D of the ACP process, all public consultation feedback was compiled into the evidenced document and submitted to the CAA. This provides an in-depth overview of how feedback received from stakeholders during the consultation process was treated. This is a baseline expectation that has been met. 	<ul style="list-style-type: none"> No IR submissions were given in relation to this project, these assessments were focused at programme level. Baseline requirements for this criteria have been. 	3
Mitigating / Corrective Actions	<i>Not applicable</i>	<ul style="list-style-type: none"> There have been no user or IR submissions in the assessment period in relation to SAIP AP6 requiring mitigation/corrective action. 	<ul style="list-style-type: none"> <i>Not applicable</i> 	N/A



**ANNEX F – ENGAGEMENT SCORING
CRITERIA**



ENGAGEMENT SCORING CRITERIA

Extract from: [Guidance on NERL's capital expenditure engagement incentive, Dec 2020, CAA](#)

	Underperformance		Baseline	Outperformance	
	Weak (1)	Poor (2)	Average (3)	Good (4)	Excellent (5)
1. Timeliness	Substantial delay in providing information, very little early warning of factors that may affect delivery.	Some delay in providing information, limited early warning of factors that may affect delivery.	Information provided in a timely manner, reasonable early warning (where possible) of factors that may affect delivery.	Information provided proactively and promptly, good quality early warning and explanation of factors that may affect delivery.	Information provided proactively and promptly, excellent quality early warning and explanation of factors that may affect delivery.
2. User-focus	Very unclear and inaccessible information provided in format not reflecting user priorities or resource constraints.	Unclear, inaccessible or perfunctory provision of information with limited regard for user priorities and resource constraints.	Reasonably clear and accessible information provided with reasonable regard for user priorities and resource constraints.	Very clear and accessible information with good regard for user priorities and resource constraints.	Extremely clear and accessible information with excellent consideration of user priorities and resource constraints.
3. Proportionality	Very little additional information provided for very material changes in capex plan.	Limited additional information provided for material changes in capex plan.	The level of substantiation provided reasonably reflects the materiality of the change under consideration.	Good substantiation for all material changes in capex plan under consideration.	Excellent substantiation for all material changes in capex plan under consideration.
4. Optioneering	Very little information on alternative options presented (including no discussion of opex interactions), no real opportunity for users and IR to scrutinise relative merits of different options.	Limited information on alternative options presented (including limited discussion of opex interactions), limited opportunity for meaningful scrutiny of relative merits of different options by users and IR.	A range of different options identified where possible (including explicit consideration of opex interactions), reasonable opportunities for meaningful user and IR engagement and scrutiny.	Good information provided on alternative options where possible (including explicit consideration of opex interactions), good opportunities for meaningful scrutiny.	Excellent information provided on alternative options where possible (including explicit consideration of opex interactions), extensive opportunities for meaningful scrutiny.
5. Responsiveness	Very limited response to user and IR submissions, does not appear that submissions have been accounted for.	Perfunctory response to user and IR submissions, insufficiently clear how these submissions have been accounted for.	Constructive response to user and IR submissions, reasonably clear explanation of how these submissions have been accounted for.	Engaged and constructive response to user and IR submissions, clear explanation of how these submissions have been meaningfully accounted for.	Engaged and highly constructive response to user and IR submissions, very clear evidence that submissions have been meaningfully accounted for after substantial consideration.
6. Mitigating & corrective action	Very little evidence of Mitigating and/or corrective actions, where appropriate, following user and IR submissions.	Limited evidence of Mitigating and/or corrective actions, where appropriate, following user and IR submissions.	In most cases reasonable Mitigating and/or corrective actions taken, where appropriate, following user and IR submissions. Actions communicated to stakeholders.	In almost all cases Mitigating and/or corrective actions taken promptly, where appropriate, following user and IR submissions. Actions clearly explained to stakeholders.	In all cases Mitigating and/or corrective actions taken promptly and proactively, where appropriate, following user and IR submissions. Actions very clearly explained to stakeholders.

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