

Appendix WWUQ8A- Multiple Occupancy Buildings

Annex 2 to EJD WWU.29 - Multiple Occupancy Buildings & Complex Distribution Systems

1.0 Introduction

This annex document provides additional supplementary information, specifically for CDSs, in support of EJD WWU.29 - Multiple Occupancy Buildings & Complex Distribution Systems, based on the feedback received from Ofgem in the Draft Determinations consultation process. This document content and structure has been developed based on the feedback received in bilateral discussions with the Ofgem Engineering Assessment team.

2.0 Winter Submission Summary

We submitted our Asset Health Engineering Justification Framework Document EJD WWU.29 in December 2024. The document included a comprehensive description of the assets within Multi-Occupancy Buildings (MOBs) and we provided our justification for the interventions required on this asset group. This was based on the risk that has been determined for each building through our detailed inspection programme, taking into account the details for each building and the condition of the assets inspected.

As stated in our Engineering Justification Document we are proposing replacement of mild-steel Riser/Lateral assets that are at 'end of life' and other Riser/Lateral systems that are constructed from materials which are not compliant with current standards and pose an unacceptable risk or are in poor condition. Our RIIO-GD3 workload and the associated costs are detailed in Table 1 below:

	RIIO-GD3	RIIO-GD3
	Costs (£m)	Workload (No.)
Planned Replacement	██████	3,405
Replacement on Failure	██████	0
Planned Refurbishment	██████	19
Refurbishment on Failure	██████	0
Planned Permanent Isolation	██████	210
Permanent Isolation on Failure	██████	0
MOB Buy Out	██████	23
Riser Pipeline Isolation Valve Surveys	██████	4,988
Total – Riser	██████	8,646
Complex Distribution Systems	██████	25
Total – CDS	██████	25
Total	██████	8,671

Table 1: RIIO-GD3 Submission Summary

3.0 WWU Draft Determination

3.1 Risers on High Rise and Medium Rise MOBs Draft Determination

In Ofgem's Draft Determinations consultation the proposed outcome for Risers & MOBs was noted as '*Partially Justified*' and reduced workload volumes were proposed. The detail noted that "*Asset health data for 91 high rise buildings (HRBs) (10+ floors) has not been provided for all materials so the volumes for HRBs has been reduced. Data is missing for 74 medium rise building (MRB) (6-9 floors) steel risers. These volumes have been reduced in our Draft Determinations. Complete asset health data would be required for highlighted volumes for full justification*".

Appendix WWUQ8A- Multiple Occupancy Buildings

This Annex document provides the additional data that was missing from our original submission, to support the case for increasing the workload volumes in the Final Determinations back to those proposed in our original submission.

The list of riser assets identified for intervention, provided in Appendix 4 of our Asset Health Engineering Justification Document, was an extract of our records taken at a point in time just prior to submission of our GD3 Business Plan. Table 2 provides a summary of the workload details provided. It is important to note that our records are continually being updated as we continue to gather data from our ongoing MOB survey programme.

Material	Low Rise 3-5 floors No. forecast in BP	Med Rise 6-9 floors No. forecast in BP	High Rise 10+ floor No. forecast in BP	Total No. forecast in BP
Copper	119	4	3	126
PE	296	18	3	317
Steel	1089	141	85	1315
Grand Total	1504	163	91	1758

Table 2: Summary of Asset Health Engineering Justification Framework Appendix 4

3.2 Risers on Medium Rise and High Rise MOBs WWU Draft Determination Response

Our intervention programme is designed to be dynamic, with a measured risk-based approach, this means that should a higher risk asset be identified (following a survey or a gas leak) the risk priority list of risers identified for intervention is updated, ensuring that we address the most at-risk assets in the population with our intervention plan based on the latest information.

Our confirmed asset population in August 2025 is:

- High rise (10 storeys and above) – 160 risers
- Medium rise (6-9 storeys) – 288 risers

In Appendix B of this Annex document, we have included a refreshed list of risers that have been identified for intervention on High Rise and Medium Rise MOBs. Appendix C shows this list in the context of our confirmed population. This is our most up to date view of workload. Some risers presented in previous lists may have moved position in the risk priority list, based on reassessment or due to other assets being identified and prioritised for intervention. Hence the number of MOBs and associated risers has changed slightly from our original submission.

In summary:

- 101 risers on High Rise Buildings are now identified for future intervention (91 proposed for intervention in RIIO-GD3).
- 162 risers on medium rise buildings are now identified for future intervention (74 proposed for intervention in RIIO-GD3).

For clarity, we are still proposing to deliver the original workload detailed in our December Engineering Justification Document in RIIO-GD3 (91 HRB risers / 74 MRB risers), but the projects delivered will be those with the highest risk based on the latest risk prioritisation at the point in time when the annual programme is locked down for each year throughout RIIO-GD3. The priority of intervention for all MOB

Appendix WWUQ8A- Multiple Occupancy Buildings

assets listed will be kept under continual review with annual workload (including type of intervention) scoped during the regulatory year prior to project delivery, consistent with our approach throughout GD2.

For risers, a score of 6+ is high risk, 3-6 is medium risk and less than 3 is low risk. Certain conditions including risers with heavy corrosion may mean that risers with risk scores lower than 3 are included in our programme, particularly if there is a non-compliance with IGEM/G/5 Edition 3 noted in the inspection e.g. construction in copper.

Importantly, for each riser where asset health data was identified as missing from our original submission, this data is now included in the master list in Appendix B, providing full engineering justification for intervention on 91 risers on High Rise Buildings and 74 risers on Medium Rise Buildings at a total cost of £[REDACTED].

4.0 Conclusion

Following feedback in the WWU Draft Determinations and the Bilateral meeting between Ofgem and WWU on 5th August 2025, the riser information identified as missing is now provided within Appendix B. This provides full engineering justification of the intervention workloads for risers on Medium Rise and High Rise MOBs in GD3.

5.0 Appendices

Appendix B

Appendix WWUQ8B- Risers identified for Intervention on High Rise and Medium Rise Buildings



Appendix
WWUQ8B- Risers id

Appendix C

Appendix WWUQ8C- Rises (High and Medium Rise) Confirmed MOB Population August 2025



Appendix
WWUQ8C- Rises (Hi