



Department for
Business, Energy
& Industrial Strategy

Revenue stream for the Nuclear RAB model:

Consultation Stage Impact Assessment

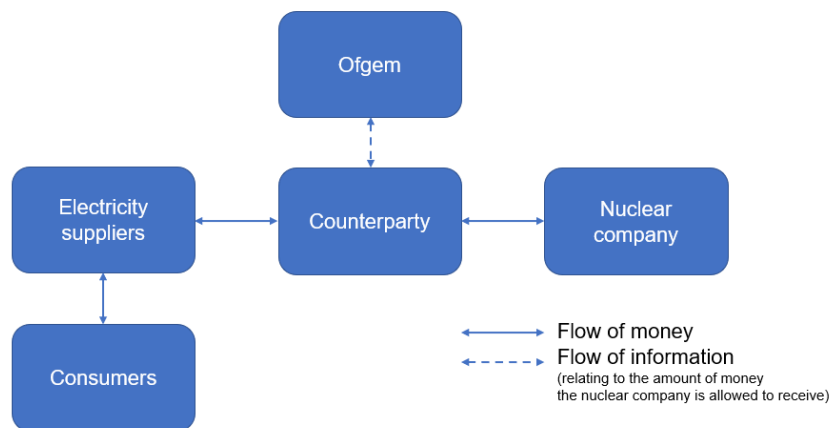
Contents

1. Background	3
2. Problem under consideration and rationale for intervention	4
3. Policy objective.....	4
4. Description of options considered	5
5. Monetised Impacts	9
6. Non-Monetised Impacts.....	10
7. Impact on small and micro businesses.....	11
8. Wider impacts and Equalities Impact Assessment.....	12
9. A summary of the potential trade implications of measure	12
10. Monitoring and Evaluation.....	12

1. Background

1. The Nuclear Energy (Financing) Act¹ ('the Act') received Royal Assent on the 31 March 2022 and makes provision for the implementation of a Regulated Asset Base (RAB) Model for nuclear projects. The RAB model can be used to finance infrastructure and enables investors to share the construction and operating risks with consumers and taxpayers.
2. One provision made by the Act was to provide the Secretary of State with powers to create a revenue stream mechanism for nuclear RAB projects. For a RAB-designated nuclear project², the relevant licensee nuclear company is allowed to receive a regulated revenue from electricity suppliers as long as RAB licence conditions are in place (i.e. throughout the RAB regulatory period). The amount the nuclear company is allowed to receive in return for financing and implementing the nuclear project will be determined by Ofgem under the terms of the RAB licence.
3. The Secretary of State will designate a revenue collection counterparty to channel funds between electricity suppliers and the nuclear company. This counterparty will then (upon direction by the Secretary of State) enter into a revenue collection contract with the 'relevant licensee nuclear company' (as defined in the Act) once the terms of a RAB licence and revenue collection contract are agreed. Ofgem will confirm what payments the revenue collection counterparty will need to make to the relevant licensee nuclear company and the revenue collection counterparty will charge levies to electricity suppliers in order to make these payments (operating on a pay if paid basis). Electricity suppliers will likely pass on the costs to consumers. The proposed process is outlined below in Figure 1.

Figure 1: Flow of revenue and information between the relevant parties



4. Section 25 of the Act places a statutory obligation on the Secretary of State to consult the required persons³ before making revenue regulations. Therefore, this consultation stage impact assessment is to support the accompanying consultation document and to provide further thinking on the potential impacts.

¹ Nuclear Energy (Financing) Act 2022, available: <https://bills.parliament.uk/bills/3057/publications>

² Nuclear regulated asset base (RAB) model: statement on procedure and criteria for designation (2022), available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1068133/nuclear-rab-model-statement-procedure-criteria-designation.pdf

³These include the Scottish and Welsh Ministers, every nuclear company in relation to which a designation under section 2(1) has effect, every nuclear company that is a relevant licensee under the Act, every holder of a licence to supply electricity under section 6(1)(d) of the Electricity Act 1989, the Authority (i.e. Ofgem), the national system operator (i.e. National Grid), and such other persons as the Secretary of State considers appropriate- which for the purpose of this consultation would include the public (i.e. any person with an interest in this policy area).

2. Problem under consideration and rationale for intervention

5. Section 1.1. of the impact assessment for the RAB model⁴ considered the financial market constraints facing new nuclear. This highlighted significant financial challenges and risks when raising large amounts of funds required for complex infrastructure projects. Whilst the primary legislation puts in place the structure required to resolve this market failure, secondary legislation is required to support effective deployment of the RAB model.
6. A robust revenue stream that ensures a secure and consistent flow of revenue from electricity suppliers to the relevant licensee nuclear company over the nuclear project's lifetime is crucial to attract investment in such a project. Without this revenue stream, the RAB mechanism will not be able to function as there would be no incentive for the markets to intervene and provide revenue during construction.
7. Government intervention is needed to create the revenue stream mechanism and ensure that all parties involved (including electricity suppliers, consumers, nuclear companies, regulators and the wider market) do not face undue costs. There are risks to these groups if the process is designed inefficiently, including unnecessary costs being placed on suppliers (which would likely be passed onto consumers), and the potential abandonment of nuclear projects.

3. Policy objective

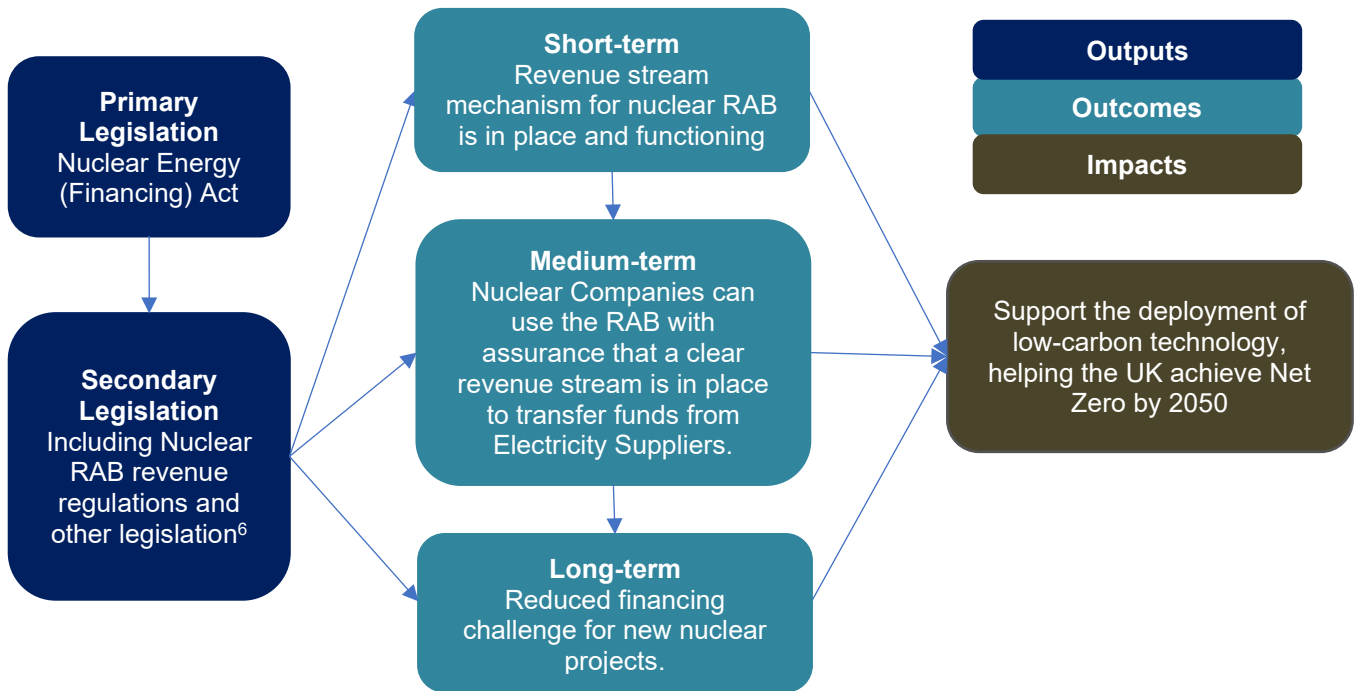
8. The overall objective of this legislation, as in the Act, is to support the UK to achieve Net Zero by 2050. As set out in the recent British Energy Security Strategy⁵, the Government is pursuing significant acceleration in our nuclear capacity as an important source of reliable low-carbon electricity. A RAB funding model is required to attract private finance at a cost that represents value for money to consumers and taxpayers.
9. The direct policy objective is to implement the revenue regulations within this Parliament (when Parliamentary time allows) to support new nuclear projects financed through a RAB model. In particular, the aims are to establish:
 - a. **A revenue stream mechanism that functions efficiently** but does not unduly burden electricity suppliers and ultimately consumers. The intention is that electricity suppliers will make payments to the revenue collection counterparty⁶ as required, to pay the relevant licensee nuclear company a regulated allowed revenue (i.e. the RAB payments). The amount will be confirmed by Ofgem and should be no more or less than required.
 - b. **A proven and reliable revenue collection counterparty** to facilitate the transfer of payments between suppliers and a relevant licensee nuclear company.
 - c. **Information sharing provisions to effectively implement the revenue stream** – This must account for the information sharing and payment confirmation mechanics between Ofgem and the revenue collection counterparty to function efficiently.
10. The theory of change (shown in Figure 2 below) presents an example of the types of outputs, outcomes (short, medium and long term) and impacts which result from implementation of a stable, clear and consistent revenue stream mechanism.

⁴ Regulated Asset Base model for new nuclear (2021), available: <https://publications.parliament.uk/pa/bills/cbill/58-02/0174/ImpactAssessment.pdf>

⁵ British energy security strategy (2022), available: <https://www.gov.uk/government/publications/british-energy-security-strategy>

⁶ The revenue collection counterparty will also need to recover from suppliers their operational/administrative costs in return for performing this role through the operational costs levy.

Figure 2: Theory of change



11. The core short-term output is legislation which puts in place a mechanism for the revenue stream to allow the nuclear RAB model to function.

4. Description of options considered

4.1. Revenue Regulations

12. The proposed approach to revenue regulations for the nuclear RAB revenue stream uses precedent established by The Contracts for Difference (Electricity Supplier Obligations) Regulations introduced in 2014⁷ ('CFD ESO Regulations'). Those regulations provided the base for each of the options discussed here since they relate to the imposition of a levy on electricity suppliers to pay amounts due under a contract for difference (CFD). The proposed revenue regulations include several elements, such as:

- a. **The revenue collection counterparty:** There is a requirement to have a revenue collection counterparty to ensure efficient and effective running of the revenue stream from suppliers to the relevant licensee nuclear company. The Low Carbon Contracts Company Ltd (LCCC) will, subject to formal Secretary of State designation, perform this role for the RAB (as they currently do in their role as 'CFD counterparty' under the CFD scheme).
- b. **Interim levy rate:** Since there is no certainty about the amount owed to the nuclear company, the revenue collection counterparty will set an interim levy rate to charge suppliers over a quarterly levy period.
- c. **Reserve amounts:** Suppliers are required to make reserve payments at the start of each quarterly levy period. This requires the revenue collection counterparty to calculate what it needs to collect from suppliers to ensure that it has a 95% probability of meeting its RAB payment obligations to the nuclear company in order to protect the revenue collection counterparty against any supplier shortfalls.
- d. **Reconciliation payments:** At the end of each quarterly levy period, the revenue collection counterparty will reconcile payments received from suppliers against those

⁷ The Contracts for Difference (Electricity Supplier Obligations) Regulations (2014), available: <https://www.legislation.gov.uk/uksi/2014/2014/contents/made>

required to the nuclear company, returning money to suppliers if they have been overcharged.

- e. **Operational cost levy:** The revenue collection counterparty will receive payments for the administration of their responsibilities as the revenue collection counterparty. This is in the form of the operational cost levy which is imposed on electricity suppliers.

13. There are differences with the nuclear RAB payment mechanics and the CFD ESO regulations, most notably that, under a RAB, Ofgem will, as the economic regulator, calculate the allowed revenue in accordance with the terms of the RAB licence.

4.2. Consultation Questions and the Impact Assessment

14. In line with the Nuclear RAB revenue regulations consultation (published alongside this impact assessment), we have considered a number of policy options. To assess the impacts, policy options have been based on areas being consulted on. Below details these consultation areas (CA):

- a. **CA 1:** CFD regulations to be replicated, which sets out the regulations we suggest are replicated from the CFD ESO Regulations.
- b. **CA 2:** Information sharing provisions between Ofgem and the revenue collection counterparty to facilitate the determination of the RAB payment, to be set out in the regulations.
- c. **CA 3:** Wider information sharing provisions between, for example, Ofgem, the revenue collection counterparty, the Secretary of State and others, for effective functioning of the revenue stream, to be set out in the regulations.
- d. **CA 4a:** Notice period for interim levy rate which specifies how much notice is provided by the revenue collection counterparty to suppliers of the interim levy rate for a given period.
- e. **CA 4b:** Notice period for the total reserve amount which specifies how much notice is provided by the revenue collection counterparty to suppliers of the total reserve amount for a given period.
- f. **CA 4c:** Notice period for individual reserve amounts which specifies how much notice is provided by the revenue collection counterparty to suppliers of the individual reserve amounts for a given period.
- g. **CA 5:** Revenue regulations which sets out certain matters that must be covered by the terms contained in the draft revenue collection contract, which is appended to the Secretary of State's direction to the revenue collection counterparty.
- h. **CA 6:** The advance notice which the revenue collection counterparty must give to the Secretary of State if they expect to be unable to continue performing their role.
- i. **CA 7:** Projecting future supplier charges which could be undertaken by the revenue collection counterparty (i.e. Ofgem could provide forecasts as part of their role estimating the RAB payments but so could the revenue collection counterparty from information shared by Ofgem).
- j. **CA 8:** Exemptions to RAB supplier obligation levies intended to be replicated from the CFD regime, for example the Energy Intensive Industry exemption.
- k. **CA 9:** Vulnerable consumers (e.g. Universal Credit recipients) which asks about whether there is any potential support to prevent suppliers from passing on costs associated with their RAB obligations to those consumers who could be most affected by bill increases.
- l. **CA 10:** The revenue collection counterparty's operational costs which looks at the potential costs to the revenue collection counterparty to perform its role.

4.3. Policy Options

15. Given the large number of CAs, we consider three policy options:

- a. **Policy Option 1: “Minimum” required RAB-adjusted Supplier Obligation (Do-minimum option).** This option represents the do-minimum action and is predicated on two criteria: i) minimum adjustments to the CFD ESO Regulations; and ii) minimum additional actions required for functioning nuclear RAB revenue regulations. We believe a do-minimum is the correct base to compare against since a do-nothing counterfactual would not represent a viable RAB mechanism, the objective of the primary legislation.
- b. **Policy Option 2 (the preferred option): “Improved” RAB-adjusted Supplier Obligation.** This option goes further and improves on some elements copied from the CFD ESO Regulations. Specifically, it includes:
 - i. Amendments to the notice periods of forthcoming quarterly interim levy rates and the reserve amounts in order to allow Ofgem to forecast a more accurate RAB payment amount to the revenue collection counterparty.
 - ii. Setting out certain matters that must be covered by the terms contained in the draft revenue collection contract between the revenue collection counterparty and the relevant licensee nuclear company. This is preferred to no terms within the do-minimum option to ensure all the necessary provisions are contained in the revenue collection contract pursuant to enabling a functioning revenue stream.
 - iii. A requirement for the revenue collection counterparty to promptly notify the Secretary of State if it is unable to carry out its duty. This is in addition to the formal 3-month notice period in the previous policy option and would provide more time to find a replacement entity.
- c. **Policy Option 3: “Going further” RAB-adjusted Supplier Obligation.** This option represents further changes in addition to those in option 2. It includes:
 - i. Revenue regulations setting out more detailed mechanics about how information is shared between certain persons, for example the timing of when information is shared. We do not consider this our preferred option since each designated project would have their own bespoke information sharing requirements, so it would be appropriate to contain the detail in the RAB licence, the revenue collection contract and/or as agreed between the relevant persons.
 - ii. Revenue regulations giving the revenue collection counterparty the ability to carry out its own indicative calculation of the RAB payment to enable them to project suppliers’ payment liabilities in upcoming quarterly periods. This is also not currently preferred since this could lead to confusion with multiple parties making their own calculations, potentially increasing the operational costs levy.

16. Table 1 outlines how the consultation areas map across the three policy options. Four consultation areas are not included. The CFD ESO Regulations (CA 1), exemptions (CA 8) and the cost elements provided by the revenue collection counterparty (CA 10) which are the same across all policy options as they are copied across from the CFD ESO Regulations. Similarly, we have no specific policy options around support for vulnerable groups (CA 9).

17. All options are appraised using a mixture of quantitative and qualitative analysis and could be amended after the consultation has concluded.

Table 1: Breakdown of policy options

Consultation Area	Policy Option 1: Do-minimum	Policy Option 2: “Improved”	Policy Option 3: “Going further”
CA 2: Information sharing	Ofgem confirms the RAB payment amount to the revenue collection	As per Policy Option 1.	As Policy Option 1, however, further details will be

Consultation Area	Policy Option 1: Do-minimum	Policy Option 2: “Improved”	Policy Option 3: “Going further”
between Ofgem and the revenue collection counterparty relating to the RAB payment	counterparty. We propose revenue regulations include appropriate information sharing provision between the two.		included within the regulations.
CA 3: Wider Information Sharing	Information sharing provisions kept at a high level within the regulations.	As per Policy Option 1.	Regulations include further details around how information will be shared, including timings by which information must be shared
CA 4a: Notice period for interim levy rate	A three-month notice period as per the CFD ESO Regulations.	A one-month notice period.	As per Policy Option 2.
CA 4b: Notice period for total reserve amount	A three-month notice period as per the CFD ESO Regulations.	A one-month notice period.	As per Policy Option 2.
CA 4c: Notice period for individual reserve amounts	A notice period of around two and a half months (i.e. eight working days after the beginning of the preceding quarter).	A two and a half weeks’ notice period.	As per Policy Option 2.
CA 5: Secretary of State directions and terms of a revenue collection contract	No specification of the certain matters that must be covered by the terms of the revenue collection contract set out in the regulations.	Certain matters that must be covered by the terms contained in the revenue collection contract between the revenue control counterparty and the nuclear company are set out within the regulations.	As per Policy Option 2.
CA 6: Notification of the revenue collection Counterparty’s inability to carry out its functions	Regulations do not require the revenue collection counterparty to notify the Secretary of State in advance of the three-month formal notice period.	Regulations require the revenue collection counterparty to promptly notify the Secretary of State if it considers it likely that it may not be able to carry out its function.	As per Policy Option 2.
CA 7: Projecting future supplier charges	Ofgem calculates and confirms the RAB payment amount to the revenue collection counterparty followed by the revenue collection counterparty calculating and confirming future levy rates to suppliers.	As per Policy Option 1.	In addition to Policy Option 1, Ofgem would also give the revenue collection counterparty information to carry out its own calculation of upcoming supplier payment liabilities

4.4. Non-legislative options

18. We have not identified any viable non-legislative options and do not believe such an approach is possible. The structures required to move money from suppliers to a nuclear company are highly unlikely to happen without regulations in place. Additionally, the previous CFD Supplier Obligation regulations demonstrate the legislative option can work.

5. Monetised Impacts

19. The primary legislation impact assessment³ estimated that the RAB model could reduce the present value cost of building and financing a new nuclear power plant by between £30bn and £80bn⁸ in present value terms compared with a CFD.
20. Specific to this secondary legislation, we have considered a range of impacts concerning the policy options around the revenue stream. Given the lack of evidence at this current stage, we have only been able to monetise one impact: the revenue collection counterparty administration costs (the operational levy costs). Other impacts are described in the following subsections.

5.1. *The revenue collection counterparty administration costs (operational levy costs)*

21. There are costs to the revenue collection counterparty associated with their role in running the revenue stream mechanism which are consistent across all policy options. These will be similar to the costs incurred in administering the CFD scheme. They have been estimated by the LCCC (using their actual costs associated with CFDs and capacity markets) and are detailed in Table 2 below. Costs include:
- a. **Payroll Costs:** Covering support functions and related full-time equivalent across the relevant teams associated with the RAB. This drops after the first year as a result of reduced costs related to set-up.
 - b. **EMR Settlement Ltd (EMRS)⁹ Costs:** Ongoing operational costs related to the operator resource required to undertake manual checks on settlement as well as handle supplier queries. EMRS is assumed to start performing their settlement services in FY23/24.
 - c. **Professional and Legal Costs:** Covering fees related to audit fees and legal employment costs.
 - d. **Premise costs:** Covering costs included with the location (council tax, rent, and/or services). The increases are mainly because of inflation and larger desk requirements.
 - e. **Contractor costs:** Covering any contractor costs where support may be required during peak time.
 - f. **Depreciation:** Covering any depreciation costs associated with hardware (including the RAB settlement system).
 - g. **Other costs:** Covering recruitment, insurance, training, stationery and other miscellaneous costs. The increases over the next two years are driven by insurance costs due to uncertainty over a new scheme.
 - h. **MWh Contingency:** As the operational costs are charged through a levy (based on forecast demand), a 5% addition is added to mitigate the risk the revenue collection counterparty does not receive enough to cover costs.

⁸ 2021 prices, discounted to a 2021 base year - Page 14 - <https://publications.parliament.uk/pa/bills/cbill/58-02/0174/ImpactAssessment.pdf>

⁹ EMRS is envisaged to be subcontracted by the revenue collection counterparty to perform their role as RAB settlement services provider.

Table 2 - LCCC's estimated RAB operational costs between 2022/23 and 2024/25 (£k in nominal terms, rounded to 2 significant figures)

Description	FY22-23	FY23-24	FY24-25
Payroll costs	400	340	370
EMRS costs	3	110	110
Professional and Legal fees	33	27	26
IT costs	21	22	24
Premises costs	14	15	18
Contractor costs	5	4	4
Depreciation	4	76	75
Other costs	55	59	74
Total	540	650	700
MWh contingency (5%)	27	32	35
Total*	560	680	740
Operational levy charge (£/MWh)	0.0020	0.0025	0.0028

*Note that the total may not appear to sum correctly due to rounding.

22. Most of these costs should affect all policy options equally as all require the revenue collection counterparty to function. For policy option 3, there could be slightly increased employee costs resulting from the revenue collection counterparty projecting the future supplier charges (CA 7).

6. Non-Monetised Impacts

23. There are several identified impacts associated with the policy options. Given our limited evidence at this stage, and the uncertainties of the final policy options, it is considered disproportionate to attempt to monetise them at this stage. This will be revisited after the consultation. Each impact is considered in the sections below.

6.1. Reserve fund opportunity cost (from CA 1, consistent across all policy options)

24. As detailed in paragraph 12.c, for each quarterly levy period, the revenue collection counterparty needs to collect funds from electricity suppliers to ensure it has a 95% probability of being able to meet its RAB payment obligations. These funds are then held by the revenue collection counterparty (in a zero-interest account) until after the reconciliation has been completed. We expect that any uncertainty around the RAB payments – which will lead to higher payments required to meet the 95% probability criteria - will likely be greater during the operational phase of the nuclear power plant (due to fluctuations in the wholesale price) rather than during construction (where near-term costs are likely to be more predictable).

25. Associated with this reserve fund amount is an opportunity cost (the value of the best alternative foregone by having to provide reserve funds to the revenue collection counterparty) to the electricity suppliers since they could have kept the funds in their own account and accrued interest.

6.2. Cost of raising collateral (from CA 1, consistent across all policy options)

26. There is a requirement for electricity suppliers to provide collateral to the revenue collection counterparty to cover the risk of them defaulting on their payment obligations. As with the CFD ESO Regulations, the amount of collateral required is 21 days of interim payments. These are held by the revenue collection counterparty.
27. As with the reserve funds, there is an opportunity cost associated since the money could have been accruing interest elsewhere.

6.3. Supplier administration costs (from CA 1, consistent across all policy options)

28. As with the revenue collection counterparty administration costs, there are likely to be administrative costs to electricity suppliers. We expect these costs to be relatively small given the similarities of the RAB revenue mechanism to the CFD supplier obligation mechanism. However, we welcome evidence from the consultation.

6.4. Costs to Ofgem of information sharing information and calculating the RAB payment to the revenue collection counterparty (from CA 2)

29. There are likely to be some costs to Ofgem associated with information sharing and calculating the amount of RAB funding required to the revenue collection counterparty. The associated cost is likely to vary depending on the level of detail specified in the regulations.
30. We would expect higher costs under Policy Option 3 which has greater specificity in the regulations than the other two options.

6.5. Cost to suppliers of uncertainty in payment amounts (from CA 4 a, b and c)

31. Our policy options consider different notice periods. Longer notice periods provide more time for suppliers to adjust for forthcoming payments. Shorter notice periods could reduce the amount of reconciliation required due to increased accuracy in the forecasts from using more up-to-date data. The overall impact on suppliers is unclear at this stage.

6.6. Revenue stream risks to the nuclear company if the revenue collection counterparty is unable to carry out its duties (CA 6)

32. The preferred option is for the revenue collection counterparty to promptly inform the Secretary of State if they are unable to carry out their duties (i.e. if possible, to inform earlier than a three-month notice period required under the CFD ESO Regulations) to reduce risks of the nuclear company not receiving the regulated revenue. The implications of different notice periods on costs are uncertain.

7. Impact on small and micro businesses

33. There are currently 20 energy suppliers in the domestic retail energy market¹⁰, up from 13 in 2010, with around eight classified as either a small business or microbusiness. The impact of this legislation on businesses will vary depending on the market share of an electricity supplier: the greater the market share, the more the electricity supplier will be charged by the revenue collection counterparty. While small and microbusinesses may be disproportionately affected by administrative costs, we expect these to be minimal given the similarities to CFD payments. We are testing potential administration costs for suppliers as part of the consultation.

¹⁰ Correct as at end of March 2022 – note that the retail energy market structure is changing at pace so the number may be different closer to time of publication.

8. Wider impacts and Equalities Impact Assessment

34. In the Nuclear Energy (Financing) Act impact assessment⁴, we identified age, disability and race, and pregnant/maternity leave groups as those most vulnerable to disproportionate energy bill impacts. Since the impacts specifically related to the set-up and running of the revenue stream may be passed onto consumers, we believe the same three groups will be vulnerable for similar reasons.
- a. **Age** – Those who are older may be less likely to benefit from future energy bill reductions from the low-carbon electricity produced from a nuclear plant. Therefore, increases to bills through potential costs imposed by suppliers to account for uncertainty or volatility in the RAB payment amount, particularly during the construction period, might not be rewarded with lower future bills.
 - b. **Disability and Race** - Ethnic Minorities are disproportionately represented in lower income households. Lower-income households are disproportionately affected by changes to electricity bills because any increase represents a larger share of their household income than those in middle- or higher-income households. Therefore, any increases imposed by suppliers to account for uncertainty or volatility in the RAB payment amount would disproportionately increase the bills of these groups.
 - c. **Pregnant/ Maternity Leave Groups** - Any increase in consumer electricity bills due to increases imposed by suppliers to account for uncertainty or volatility could particularly impact those on unpaid maternity leave, or unable to work due to pregnancy. Therefore, the revenue stream regulations could disproportionately increase the bills of these groups.
35. We do not expect any disproportionate impacts from this legislation on the following protected characteristic groups: Marriage/Civil Partnership, Religion or Belief, Sex, Gender Reassignment or Sexual Orientation.
36. The consultation is seeking views on potential support to vulnerable consumers, and we will make a full assessment of any potential impacts in the final impact assessment. This will include engagement with the BEIS Affordability Unit and Fuel Poverty Strategy Team.

9. A summary of the potential trade implications of measure

37. The impacts from these measures are not considered to impact international trade and investment.

10. Monitoring and Evaluation

38. Given the Act has only recently received Royal Assent, there are not currently any monitoring and evaluation provisions in place. Monitoring on a mixture of monthly, quarterly and/or annual frequencies would likely be necessary, with metrics developed to assess the programme's progress and inform evaluation activity. Where data is already being collected for current nuclear projects, it will be utilised to avoid duplication, however, additional data may also be required. Any monitoring data used would be shared and discussed regularly with key stakeholders.
39. The impacts could be assessed against a baseline study and a counterfactual scenario. The original objectives will be assessed as having been met or requiring amendments to the intervention through using a combination of regular monitoring, key performance indicators, and evaluations. Likely types of evaluation could include a combination of process evaluations to expand on the theory of change (see Figure 2) and assess how effectively different projects are running or have run; impact evaluations at the end of key parts of the project to assess how effectively the overall project objectives have been met; and/or an interim progress assessment (either against a baseline or towards project objectives or timelines) to assess progress towards projects' objectives.

40. The main external factors that will have an impact on the success of the intervention include changes of policy relating to nuclear financing. Similarly, other changes in the market or sector might require the policy to be reviewed sooner or have the preferred option changed.