

# Consultation on Actual Air Navigation Services costs 2022 and Unit Rates for 2024

13 June 2023

IRISH AVIATION AUTHORITY ÚDARÁS EITLÍOCHTA NA HÉIREANN

# **Table of Contents**

1.	About this Consultation	. 3
2.	Background	. 5
3.	Summary of Actual Costs Incurred in 2022	. 7
4.	Summary of the Calculation of Intended 2024 Unit Rates	16

# 1. About this Consultation

- 1.1 As of 1 May 2023, the Commission for Aviation Regulation (CAR), formerly Ireland's economic aviation regulator, has been dissolved, and its economic regulatory functions have been merged with the Irish Aviation Authority (IAA). From the same date, the air traffic control functions of the IAA have been transferred to a newly established ANSP, AirNav Ireland (ANI). The pre-existing safety and security oversight functions have been retained within the IAA. Consequently, the IAA is now Ireland's independent civil aviation regulator, responsible for oversight of a range of safety, security, economic, and consumer related functions, including the role of NSA under the Single European Sky performance and charging system.
- 1.2 In this document, we are consulting on three aspects required under Implementing Regulation (EU) 317/2019 ("the Regulation") laying down the current performance and charging scheme. The three aspects of the consultation are:
  - The actual costs incurred in the period 2022 associated with the provision of En Route services, and Terminal air navigation services in Ireland at the State Airports Dublin, Cork, and Shannon;
  - The intended unit rates for 2024 of En Route and Terminal services;
  - The costs exempt from the cost risk sharing mechanism relating to 2022.
- 1.3 The consultation consists of two steps. First, a video conference meeting on 4 July 2023 from 1400-1700 Irish Time (1500-1800 CET). Second, we are seeking any written feedback or comments in relation to the 2022 actual costs and the intended 2024 Unit Rates by 11 July 2023. Written feedback should be marked 'Response to consultation on 2022 Actual ANS costs', and sent to consultation@iaa.ie. We may correspond with those who make submissions, seeking clarification or explanation of their submissions.
- 1.4 Ordinarily we place all submissions received on our website. If a submission contains confidential material, it should be clearly marked as confidential and a redacted version suitable for publication should also be provided.
- 1.5 We do not ordinarily edit submissions. Any party making a submission has sole responsibility for its contents and indemnifies us in relation to any loss or damage of whatever nature and howsoever arising suffered by us as a result of publishing or disseminating the information contained within the submission.
- 1.6 In preparing this consultation, we:
  - Obtained from all relevant parties the actual 2022 detail cost data which allows us to compare actual costs with determined costs for the 2022 regulatory period.

- Assessed the drivers of any differences between determined and actual costs for 2022.
- Verified the correct calculation of the intended 2024 unit rates for all parties based on the determined costs and the adjustments carried over from previous years.
- Verified the correct application of the cost risk sharing mechanism during 2022.
- 1.7 Following this consultation, the 'Costs Exempt' submission will be provided to the European Commission. The final Unit Rates and Determined Costs tables will then be submitted to the Central Route Charges Office (CRCO) ahead of the Enlarged Committee on Route Charges in November.
- 1.8 This document is organised as follows, Section 2 will provide background information and context on the plan for Reference Period 3 (RP3), Section 3 will give an overview of the actual costs, and Section 4 will detail the intended 2024 Unit Rates.

# 2. Background

- 2.1 In November 2020, in response to the impact of COVID-19 on Air Navigation Provision, Commission Implementing Regulation (EU) 2020/1627 was passed. This legislation contained exceptional measures in response to the impact of COVID-19 and a revised timeline for the submission of updated RP3 performance plans. It also determined that:
  - Cost efficiency targets should cover determined costs for 2020 and 2021 as a single period.
  - Unit rate adjustments from 2020-2021 arising from the late adoption of Performance Plans should be spread over a period of 5 calendar years, though NSAs may extend this to 7 calendar years where necessary to avoid a disproportionate effect of the carry-overs on the unit rates charged to airspace users.
  - Incentive schemes shall cover only the calendar years 2022 to 2024, and that the incentive schemes shall produce financial effects in the form of carry-overs and subsequent unit rate adjustments only as from the first year following the adoption of the performance plan.
- 2.2 Revised Business Plans and investment plans were thus developed by the regulated entities in the first half of 2021. A cost submission in relation to the proposed NSA costs was also provided. These were assessed by the NSA, which then published a consultation on a proposed revised Performance Plan in July 2021.
- 2.3 Following conclusion of the consultation period, the revised RP3 Performance Plan was submitted in October 2021. Following a further adjustment to the Environment KPA targets, in April 2022 the European Commission assessed that the Performance Plan was consistent with the Union-wide targets.
- 2.4 The Performance Plan targets align with the union wide targets for the Environment KPA (1.13% for 2021 to 2024), and for the Capacity KPA, which has targets of 0.01 ATFM delay minutes per flight in 2021 and 0.03 in 2022 to 2024 for En Route, and targets of 0.25 minutes in 2021 and 0.20 in 2022 to 2024 for Terminal.
- 2.5 The Performance Plan outperforms the Union wide targets for Cost efficiency. The weighted average (WA) En Route Determined Unit Cost (DUC) for RP3 is 1.9% lower than the equivalent value implied by the En Route Union-wide DUC target. The Performance Plan also plans to meet the Safety KPA targets in each year of the period.
- 2.6 The Final Performance Plan was adopted by the Member State in May 2022.
- 2.7 As part of the consultation on updating the Performance Plan, the NSA decided

that:

- The Unit Rate adjustments for 2020-2021 would be spread over 7 years rather than 5, to spread the effect of the carry-overs on the unit rates.
- Allowable changes in actual capital costs of investments compared to determined costs would be adjusted for on a net basis through the RP4 Performance Plan, rather than on an n+2 basis. Updates on the progress of the AirNav Ireland (ANI) investment programme would be published biannually.<sup>1</sup>
- 2.8 All of this material is available on the IAA website.<sup>2</sup> Regulated Entity accounts are also published.<sup>3</sup>

<sup>&</sup>lt;sup>1</sup> <u>https://www.iaa.ie/commercial-aviation/economic-regulation/air-navigation-charges/regulatory-reporting-1</u>

<sup>&</sup>lt;sup>2</sup> https://www.iaa.ie/commercial-aviation/economic-regulation/air-navigation-charges

<sup>&</sup>lt;sup>3</sup> <u>https://www.iaa.ie/commercial-aviation/economic-regulation/air-navigation-charges/regulatory-reporting-1</u>

# 3. Summary of Actual Costs Incurred in 2022

- 3.1 In this section we consult on the actual costs of air navigation services incurred in 2022 and the difference between the final actual and the determined costs contained in the RP3 performance plan for the 2022 regulatory period.<sup>4</sup> This is required under Article 24 (3) of the Regulation.
- 3.2 We have verified the eligibility of the cost categories included for En Route and Terminal services. These are aligned to the categories used for the Determined Costs in the Performance Plan. En Route services cover air navigation in the Shannon Flight Information and Upper Information Regions (FIR/UIR) and exclude the Shanwick Oceanic airspace. Terminal services cover air navigation during approach, landing, take-off and departure provided at Dublin, Cork and Shannon airports.
- 3.3 In real terms (2017 prices), the total actual costs in 2022 were 9.1% lower for En Route services and 5.7% higher for Terminal services than the real determined costs in the RP3 plan.<sup>5</sup> Actual unit costs were below the determined unit costs by 14.3% for En Route, and 3.4% higher than determined unit costs for Terminal.
- 3.4 Below, we lay out the En Route and Terminal costs by entity in nominal terms.

# En Route Costs

3.5 In nominal terms, total actual En Route costs in 2022 were €119.0m, which is 4.1% (€5.1m) below the determined costs of €124.1m. We further note that the nominal determined costs within the Performance Plan for 2022 are based on an inflation forecast of 1.9%; actual inflation in 2022 was 8.1%. This will be adjusted for in future unit rates as provided for in the Regulation.

# AirNav Ireland (ANI)

- 3.6 The actual ANI costs of €96.8m represent 81% of the total actual costs and were 6.2% (€6.4m) lower than determined costs. This was driven primarily by actual Other Operating costs, which were 15.6% (€4.8m) lower than determined costs, which ANI states was the result of planned opex being deferred in favour of service delivery due to a strong return in traffic during 2022. The Other Operating costs deferred include consultancy costs, which were deferred as resources were diverted to operations in light of the increased traffic.
- 3.7 This was partially offset by Staff Costs being 1.2% (€0.7m) higher than

<sup>&</sup>lt;sup>4</sup> Article 2 of the Regulation defines actual cost as "a cost actually incurred in a calendar year for the provision of air navigation services which are subject to certified accounts or, in the absence of such certified accounts, subject to a final audit". Determined costs are the cost base for en route and terminal charges established according to the Regulation prior to the start of each reference period, as part of the performance plans.

<sup>&</sup>lt;sup>5</sup> Noting that, as per the Regulation, capital costs are not converted to real prices.

determined costs. ANI states that this is the result of higher than forecast overtime costs in 2022, partially offset by a lower headcount.

- 3.8 Overall, ANI operating costs (staff and other operating costs) were 4.4% ( $\in$ 4.1m) lower than determined.
- 3.9 Depreciation costs were 20.2% (€1.7m) lower than determined. ANI states this was due to delays in completion dates for projects caused by resource availability shortages, and consequently a focus on ongoing operations over capex. Delays were also caused by COVID-19 impacts and difficulties sourcing contractors and service providers.
- 3.10 The actual cost of capital costs were 21% (€0.6m) lower than the determined figure, also due to delays in project completions as stated above, according to ANI.

# Met Eireann Air Services Division (MET ASD)

- 3.11 Met Éireann actual costs of €8.2m represent 6.9% of total ANS actual costs and were 20.3% (€1.4m) higher than determined costs. This was driven primarily by actual staff costs in 2020/2021 being 26% (€0.8m) higher than determined costs, which MET has stated was due to its determined costs being calculated based on mid points of salary scales (as per the Business Plan submitted to the NSA), while the actual costs are calculated based on the true points on the salary scale for each relevant staff member. MET ASD currently has a high number of senior staff occupying advanced positions on the scales. The difference was also partly driven by increases in salaries due to Government salary adjustments.
- 3.12 It should also be noted that actual Other Operating costs were 25.4% (€0.5m) higher than determined; MET states this was due to inflation in Core activity areas such as ICT, business continuity, and high-performance computing, among others. Exceptional items costs were close to determined figures, with a variance of 6.2% (€0.06m) above determined costs.

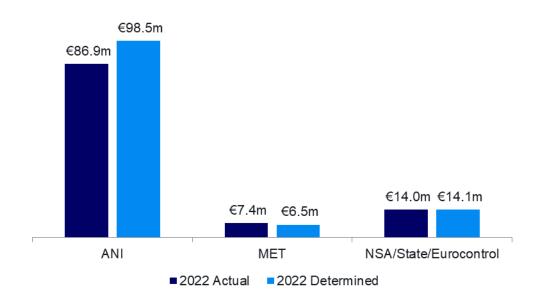
### NSA/State/Eurocontrol

- 3.13 The actual NSA/State/EUROCONTROL costs of €14.0m represent 12% of the total actual costs and were 0.7% lower than determined costs. This was primarily driven by staff costs being 9.7% (€0.2m) lower than determined as a result of later recruitment than anticipated. Depreciation was also 97.6% (€0.2m) lower than determined because of later-than-anticipated capitalisation process of a software program and a greater-than-anticipated focus on IT infrastructure opex rather than capex.
- 3.14 State costs for 2022 were 8.3% (€0.9m) lower than determined costs, whereas Supervision costs were 28.2% (€0.8m) higher than determined costs. This is primarily due to certain Other Operating costs listed as State costs in the

Performance Plan now being listed as Supervision costs, rather than a change in costs themselves. This was also noted in last year's consultation.

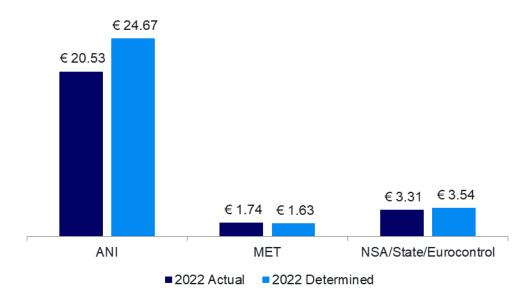
### Unit costs

- 3.15 The actual 2022 unit costs, in real terms, was €25.58, which is 14.3% (€4.26) lower than the determined unit costs. Unit costs were lower in part because actual service units of 4.2m were 6.1% higher than the forecast service units for 2022 (4.0m).
- 3.16 Charts 1 and 2 below show the real actual and determined En Route unit costs for each category in 2022.



### Chart 3.1: 2022 Actual and Determined En route Total Costs

Source: Reported costs in real terms (2017 prices) based on financial data from ANI, IAA, and Met Éireann.



### Chart 3.2: 2022 Actual and Determined En route Unit Costs

# **Terminal Costs**

- 3.17 In nominal terms, total Terminal costs in 2022 were €31.3m, which is 11.3% (€3.2m) higher than the 2022 determined costs of €28.1m. As noted above, the nominal determined costs within the Performance Plan for 2022 are based on an inflation forecast of 1.9%; actual inflation in 2022 was 8.1%. This will be adjusted for in future unit rates as provided for in the Regulation.
- 3.18 Chart 3 below shows the real actual and determined terminal total costs for each party in 2022.

# ANI

- 3.19 The actual ANI costs of €28.0m represent 89% of the total ANS actual costs and were 11.2% (€2.8m) higher than the determined costs.
- 3.20 Actual staff costs across the period were 9.4% (€0.9m) higher than determined. The reasons for the difference were similar to those for En Route, namely higher overtime costs. Additionally, ANI stated that higher-than-expected traffic and training for the new North runway operations contributed to higher staff costs.
- 3.21 Other operating costs were 45.1% (€3.2m) higher than determined. Overall, actual operating costs (staff and other operating costs) were 24% (€4.1m) higher than determined operating costs.

Source: Reported costs in real terms (2017 prices) based on financial data from ANI, IAA, and Met Éireann.

- 3.22 The main reason for higher-than-determined other operating costs was because ANI recognised an impairment loss of €4.7m in 2022, which is not contained within the determined costs. ANI stated that this was due to an asset in installations in progress not being viable due to emerging technology and changes to operational processes. Excluding this impairment, other operating costs were 22% (€1.5m) lower than determined, due to planned opex being deferred in favour of service delivery following strong traffic return during 2022 according to ANI.
- 3.23 In nominal terms and excluding the impairment loss, total ANI terminal operating costs (staff and other operating costs) were 3.7% (€0.6m) lower than determined costs. Total nominal ANI terminal costs overall without the impairment were 7.5% (€1.9m) lower than determined costs.
- 3.24 Total nominal terminal costs for all entities were €26.6m in 2022 without the impairment loss, which is 5.4% (€1.6m) lower than determined costs. This is shown in real terms in Charts 3.3 and 3.4.
- 3.25 Depreciation and cost of capital costs were 21.0% (€1.0m) and 6.2% (€0.2m) lower than determined respectively. This was primarily due to similar reasons as those for En Route, pushing back capital expenditure and project completions.

# MET ASD

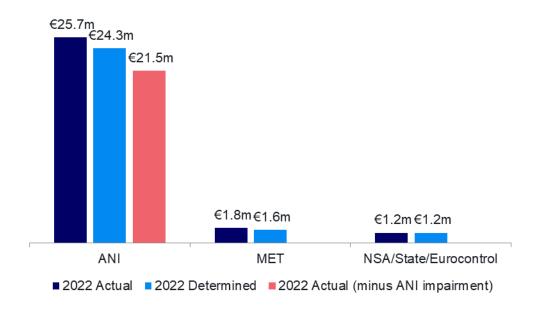
3.26 The actual costs of Met Éireann ASD of €2.1m represent 6.6% of total actual ANS costs and were 20.2% (€0.4m) higher than determined costs. This difference was driven primarily by higher than determined staff costs, for the same reason described above in the En Route section.

# NSA/State Costs

3.27 The actual NSA and State costs of €1.2m represent 4.0% of the Terminal ANS costs and were in line with determined figures. Actual costs were 0.5% (€0.01m) higher than determined costs for 2022. Within these costs, other operating costs were 11.6% (€0.08m) higher than determined due to costs associated with the merger of CAR and IAA SRD.

# Unit costs

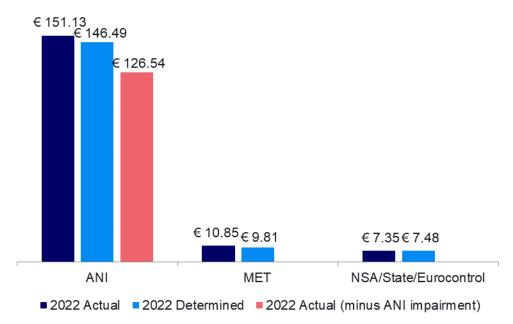
3.28 Actual 2022 unit costs, in real terms, of €169.32 were 3.4% (€5.54) higher than the 2022 determined unit costs of €163.79, driven by higher-than-expected costs as described above. Actual service units of 170.0k were higher than the forecast of 166.2k which partially offset increased actual unit costs.



#### Chart 3.3: 2022 actual and determined terminal total costs

Source: Reported costs in real terms (2017 prices) based on financial data from ANI, IAA, and Met Éirean.

Chart 3.4: 2022 actual and determined terminal unit costs



Source: Reported costs in real terms (2017 prices) based on financial data from ANI, IAA, and Met Éirean.

### **Costs Exempt**

3.29 This section sets out further detail on potential costs exempt from risk sharing. This must be reported to the European Commission, and is ultimately reflected in the Unit Rates. These categories, reported in nominal terms below, are:

- Investments
- Pensions costs
- NSA/State/EUROCONTROL costs
- Interest Rates

### Investments

- 3.30 For En Route, actual ANI depreciation costs of €6.7m was 20.2% (€1.7m) lower than the determined depreciation costs of €8.4m. Actual cost of capital costs of €2.3m was 21% (€0.6m) lower than the determined costs of €2.9m, because of the delays in project completions as discussed above.
- 3.31 For Terminal, actual ANI depreciation costs of €3.9m were 21.0% (€1.0m) lower than determined costs of €4.9m. The principal reason for the variance is the later-than-expected completion of a new software platform and the prioritisation of opex rather than capex. Actual cost of capital costs of €3.3m was 6.2% (€0.2m) lower than the determined costs of €3.5m. This was largely due to the same reason.

	Determined (€m)	Actual (€m)
En Route Depreciation	8.4	6.7
Terminal Depreciation	4.9	3.9
En Route Cost of Capital	2.9	2.3
Terminal Cost of Capital	3.5	3.3

### Table 3.1: ANI actual vs determined Capital Costs for 2022

Source: ANI, IAA calculations

3.32 For En Route, MET ASD actual depreciation of €0.7m for 2022 was equal to determined costs. Similarly for Terminal, actual depreciation of €0.2m for 2022 was equal to determined costs. No cost of capital is charged in relation to MET ASD assets.

### Table 3.2: MET ASD actual vs determined Capital Costs for 2022

	Determined (€m)	Actual (€m)
En Route Depreciation	0.7	0.7
Terminal Depreciation	0.2	0.2

Source: MET ASD, IAA calculations

3.33 The difference between actual and determined costs will, where allowable, be adjusted for as part of the RP4 planning process. We will adjust capital costs for the actual profile of capitalisations compared to planned. However, there will be no adjustment for the 2020 actuals being reported on the basis of a higher WACC, before this was re-set in the revised Performance Plan.

- 3.34 ANI is currently progressing its Capital Investment Plan 2020-2024. The three largest projects in the plan, the new control tower at Dublin Airport, the new tower equipment and fit-out, and the New En Route Contingency Centre were all delivered by the end of 2021.
- 3.35 However, delivery of three of the largest remaining projects has been rescheduled by up to a year, these are: COOPANS 2019 Roadmap builds (Q4 2024 instead of Q4 2023), EASDS (Q1 2024 instead of Q2 2023), and New Dublin Radar Replacement (Q4 2023 instead of Q4 2022).
- 3.36 In the development of the Performance Plan, the NSA considered that the planned timeline for the delivery of investments was ambitious and would likely not be met in full. Thus, the capital cost remuneration assumption in the Performance Plan is that 80%, rather than 100%, of the forward programme will be delivered to the planned timeline set out in the update on the delivery of investments.

### Pensions Costs

- 3.37 Article 28(3)(c) provides that 'unforeseen and significant changes in pension costs established in accordance with Article 22(4) resulting from unforeseeable changes in national pensions law, pensions accounting law or unforeseeable changes in financial market conditions.'
- 3.38 No such changes have been reported for assessment by the NSA, thus no adjustment is included.
- 3.39 ANI actual En Route pension costs were €11.1m, 2.6% (€0.3m) lower than the determined pension costs of €11.4m, which is consistent with a lower-than-expected headcount, even if total staff costs were slightly higher than determined as a result of overtime. Actual Terminal pension costs were €1.87m, 2.9% (€0.05m) higher than the determined pension costs of €1.81m.
- 3.40 MET ASD actual En Route pension costs were €0.36m, 26% (€0.07m) higher than the determined pension costs of €0.28m, which links to the staff costs being higher than determined. Actual Terminal pension costs were €0.09m, 26.3% (€0.02m) higher than the determined pension costs of €0.07m.

### NSA/State/Eurocontrol Costs

3.41 En Route NSA/State/EUROCONTROL costs for 2022 are 0.7% (€0.09m) lower than planned, due to staff costs and depreciation being lower than determined. This was somewhat offset by other operating costs being slightly higher than planned. EUROCONTROL costs were marginally lower (€0.01m; 0.1%) than expected.

### Table 3.3: Variation in NSA/State/EUROCONTROL Costs

	Determined (€m)	Actual (€m)
Eurocontrol costs	7.43	7.42
Staff costs	2.46	2.22

Source: IAA, IAA calculations

### Interest Rate on loans

3.42 This is not applicable and no amounts have been proposed to the NSA for assessment.

# 4. Summary of the Calculation of Intended 2024 Unit Rates

4.1 In this section we consult on the intended 2024 Unit Rates. This is required under Article 30 of the Regulation.

# En Route

- 4.2 The intended 2024 unit rate for En Route services is €28.76. This is 9.0% higher than the 2023 unit rate of €26.37. This rate is approximately €2.28 higher than would have been the case had adjustments not been applied to the total determined costs for En Route for 2024. The adjustments are defined in the Regulation and serve to increase the nominal determined costs by approximately €11.1m, before the Unit Rate is calculated.
- 4.3 Row 11 of Table 4.1 shows that the total costs applicable for the En Route unit rate calculation are €140.7m after adjustments. They are 8.6% higher than the determined costs calculated for 2024, as shown in Row 1 (€129.6m). Rows 2 to 10 show the applicable adjustments. The first set, as laid out in rows 2 to 9, are adjustments caried forward from RP2 to be spread across RP3. The largest of these adjustments is in Row 2 and is related to the inflation adjustment mechanism in accordance with Article 25 (2)(b) of the Regulation.
- 4.4 ANI has also included in its submitted adjustments the return of capital costs collected in RP2 associated with unspent Capex. The value in the 2024 rate is €0.9 million for the return unspent capex relating to the year 2019 for En Route. ANI intends to return such capital costs to airspace users over 7 years commencing in 2023.
- 4.5 The second set is contained solely in row 10. This figure is related to the recovery of losses resulting from the COVID-19 emergency measures and which will be spread over a seven-year period. Overall, these adjustments combine to increase the Unit Rate for 2024 to be 8.6% higher than the 2024 Determined Costs divided by the forecast Service Units.

	Total	ANI	MET	NSA/State
1. Determined costs in nominal terms -				
VFR excl. (Art. 25(2)(a))	€129.6m	€107.9m	€6.9m	€14.7m
2. Inflation adjustment: amount carried	011010111	010710111		02
over to year n (Art. 25(2)(b))	€ 6.8m	€ 6.3m	€0.4m	_
3. Traffic risk sharing adjustment:				
amounts carried over to year n (Art.				
25(2)(c))	-€2.9m	-€2.9m	-	-
4. Differences in costs as per Art. 28(4)				
to (6): amounts carried over to year n				
(Art. 25(2)(d))	-€0.09m	-	-	-€0.09m
5. Financial incentives: amounts carried				
over to year n (Art. 25(2)(e))	-	-	-	-
6. Modulation of charges: amounts				
carried over to year n (Art. 25(2)(f))	-	-	-	-
7. Traffic adjustments: amounts carried				
over to year n (Art. 25(2)(g) and (h))	-€0.8m	€0.4m	-€0.4m	-€0.8m
8. Other revenues (Art. 25(2)(i))	-€1.6m	-€1.6m	-	-
9. Cross-financing between charging				
zones (Art. 25(2)(j))	-	-	-	-
10. Difference in revenue from temporary				
application of unit rate (Art. 25(2)(k))	€9.8m	€7.4m	€1.1m	€1.4m
11. Grand total for the calculation of				
year n unit rate	€140.7m	€117.5m	€8.1m	€15.2m
12. Forecast total service units for year n				
(performance plan)	4.9m	4.9m	4.9m	4.9m
13. Applicable unit rate for year n	€28.76	€24.01	€1.65	€3.10

### Table 4.1: Applicable En route Unit Rate for 2024

Source: Reported En Route tables based on costs as per financial data from ANI, IAA, and Met Éireann.

# Terminal

- 4.6 The intended 2024 Unit Rate for Terminal services is €184.90. This is up 13.5% from the 2023 Unit Rate of €162.85. This Unit Rate is €11.73 higher than would have been the case had adjustments not been applied to the total determined costs for the Unit Rate calculation. The adjustments are defined in the Regulation and serve to increase the nominal determined costs by approximately €2.1m, before the Unit Rate is calculated.
- 4.7 As with Table 4.1, row 11 of Table 4.2 shows that the total costs applicable for the Terminal unit rate calculation are €33.9m after adjustments. This is 6.8% higher than the determined costs calculated for 2024, as shown in Row 1 (€31.7m). Rows 2 to 10 show the applicable adjustments. The first set, as laid out in rows 2 to 9, are adjustments caried forward from RP2 to be spread across RP3. The largest of these adjustments is in Row 2 and is again related to the inflation adjustment mechanism in accordance with Article 25 (2)(b) of the Regulation.
- 4.8 Like for En Route, ANI has reported a downward adjustment for the return of

capital costs associated with unspent Capex relating to RP2. The value of this in the 2024 Unit Rate calculation is €0.5 million.

4.9 The figure in Row 10 is related to the recovery of losses resulting from the Covid-19 emergency measures and which will be spread over a seven-year period.

	Total	ANI	MET	NSA/State
1. Determined costs in nominal terms -	€31.74m	€28.65m	€1.73m	€1.35m
VFR excl. (Art. 25(2)(a))				
2. Inflation adjustment: amount carried over to year n (Art. 25(2)(b))	€1.26m	€1.16m	€0.11m	-
3. Traffic risk sharing adjustment: amounts carried over to year n (Art. 25(2)(c))	-€0.05m	-€0.05m	-	-
4. Differences in costs as per Art. 28(4) to (6): amounts carried over to year n (Art. 25(2)(d))	€0.01m	-	-	€0.01m
5. Financial incentives: amounts carried over to year n (Art. 25(2)(e))	-	-	-	-
6. Modulation of charges: amounts carried over to year n (Art. 25(2)(f))	-	-	-	-
7. Traffic adjustments: amounts carried over to year n (Art. 25(2)(g) and (h))	€0.02m	€0.08m	-€0.03m	-€0.03m
8. Other revenues (Art. 25(2)(i))	-€0.87m	-€0.87m	-	-
9. Cross-financing between charging zones (Art. 25(2)(j))	-	-	-	-
10. Difference in revenue from temporary application of unit rate (Art. 25(2)(k))	€1.78m	€1.31m	€0.31m	€0.15m
11. Grand total for the calculation of	€33.88m	€30.28m	€2.12m	€1.48m
year n unit rate				
12. Forecast total service units for year n (performance plan)	183.26	183.26	183.26	183.26
13. Applicable unit rate for year n	€184.90	€165.22	€11.58	€8.09

### Table 4.2: Applicable Terminal Unit Rate for 2024

Source: Reported terminal tables based on costs as per financial data from ANI, IAA, and Met Éireann.