

Scenario 1

Scenario 1 Totals **3,854,323** **2,741,566**

Orig. CUS Claim Amt	Claim Head	Issues arising	Range of 'Top-line' values	
			From	To
3,753,466	Labour		3,753,466	3,753,466
		1 Hiab Driver hours - Labour and plant	Range -231,927	-429,214
		2 Embargo Hours	Range -71,130	-140,713
		3 Rate Difference	Agreed -116,994	-113,000
		4 Rate Increase (£14.89 to £18.80)	-897,229	-871,182
		5 Claimed versus Paid	-6,883	-6,883
		6 Disruption found - Goes to question of culpability	<i>To be resolved separately</i>	
		7 Remedials generally - Goes to question of culpability	<i>To be resolved separately</i>	
2,226,801	Plant		719,016	0
		1 Main Plant items derived from CPA		
		2 Excavators/Breakers		
		3 Hiab hours overclaim		
		4 Main Plant values/rates - 'windfall' from Values not cost		
		5 Small Plant 'windfall'		
		6 Remedials to be deducted		
		7 Recovery under measure and change control		
217,231	Reinstatement		0	0
105,272	Prelims		50,000	50,000
225,311	Traffic Management		112,500	112,500
434,028	Fluctuations	7.0%	3,310,819	2,354,974
583,830	Markup	8.8%	231,757	164,848
1,300,000	Claim Prep. Costs		311,747	221,744
8,845,938	Totals		0	0
			3,854,323	2,741,566

8,848,839

Range (Workings)		
From	To	
356,410	356,410	
-8,289	-15,340	-7,051
-3,033	-6,000	-2,967
345,088	335,070	

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Plant Values			
	From	To	
4,610,542	4,610,542		
-717,737	-1,435,473	50%	100%
-201,000	-134,000		
-61,500	-41,000	-980,237	-1,610,473
-388,930	-253,224	1,806,243	1,176,006
-400,000	-700,000		
-213,103	-368,432	7.50%	18.00%
-1,909,256	-1,909,256		
719,016	-230,844		

Carillion Utility Services Limited v tie Limited; Mediation on 9 & 10 November 2010

Schedule 4 Rates and Prices claim - Analysis of likely settlement scenarios

Scenario 2

APPENDIX 2

Scenario 2 Totals **5,431,375** **4,562,277**

Orig. CUS Claim Amount	Claim Head	Issues arising	Range of 'Top-line' values	
			From	To
3,753,466	Labour		3,753,466	3,753,466
		1 Hiab Driver hours - Labour and plant	Range -231,927	-429,214
		2 Embargo Hours	Range -71,130	-140,713
		3 Rate Difference	Agreed -116,994	-113,000
		4 Rate Increase (£14.89 to £18.80)		
		5 Claimed versus Paid	-6,883	-6,883
		6 Disruption found - Goes to question of culpability	<i>To be resolved separately</i>	
		7 Remedials generally - Goes to question of culpability	<i>To be resolved separately</i>	
2,226,801	Plant		1,176,457	692,787
		1 Main Plant items derived from CPA		
		2 Excavators/Breakers		
		3 Hiab hours overclaim		
		4 Main Plant values/rates - windfall from Values not cost		
		5 Small Plant 'windfall'		
		6 Remedials to be deducted		
		7 Recovery under measure and change control		
217,231	Reinstatement		0	0
105,272	Prelims		50,000	50,000
225,311	Traffic Management		112,500	112,500
434,028	Fluctuations	7.0%	4,665,488	3,918,943
583,830	Markup	8.8%	326,584	274,326
1,300,000	Claim Prep. Costs		439,302	369,008
8,845,938	Total		0	0
			5,431,375	4,562,277

8,848,839

Range (Workings)		
From	To	
356,410	356,410	
-8,289	-15,340	-7,051
-3,033	-6,000	-2,967
345,088	335,070	

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Plant Values			
	From	To	
4,610,542	4,610,542	0%	0%
0	0		
-268,000	-134,000		
-82,000	-41,000	-350,000	-175,000
-524,636	-562,318	2,436,479	2,611,479
-400,000	-700,000		
-250,193	-571,180	7.50%	18.00%
-1,909,256	-1,909,256		
1,176,457	692,787		

Carillion Utility Services Limited v tie Limited; Mediation on 9 & 10 November 2010

Schedule 4 Rates and Prices claim - Analysis of likely settlement scenarios

APPENDIX 3

Scenario 3

Scenario 3 Totals **4,173,843** **3,333,031**

Orig. CUS Claim Amount	Claim Head	Issues arising	Range of 'Top-line' values	
			From	To
3,753,466	Labour		3,753,466	3,753,466
		1 Hiab Driver hours - Labour and plant	Range -231,927	-429,214
		2 Embargo Hours	Range -71,130	-140,713
		3 Rate Difference	Agreed -116,994	-113,000
		4 Rate Increase (£14.89 to £18.80)	-897,229	-871,182
		5 Claimed versus Paid	-6,883	-6,883
		6 Disruption found - Goes to question of culpability	<i>To be resolved separately</i>	
		7 Remedials generally - Goes to question of culpability	<i>To be resolved separately</i>	
2,226,801	Plant		993,480	508,061
		1 Main Plant items derived from CPA		
		2 Excavators/Breakers		
		3 Hiab hours overclaim		
		4 Main Plant values/rates - windfall from Values not cost		
		5 Small Plant 'windfall'		
		6 Remedials to be deducted		
		7 Recovery under measure and change control		
217,231	Reinstatement		0	0
105,272	Prelims		50,000	50,000
225,311	Traffic Management		112,500	112,500
434,028	Fluctuations	7.0%	3,585,283	2,863,035
583,830	Markup	8.8%	250,970	200,412
1,300,000	Claim Prep. Costs		337,590	269,583
8,845,938	Total		0	0
			4,173,843	3,333,031

8,848,839

Range (Workings)		
From	To	
356,410	356,410	
-8,289	-15,340	-7,051
-3,033	-6,000	-2,967
345,088	335,070	

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Plant Values			
	From	To	
4,610,542	4,610,542		
-287,095	-287,095	20%	20%
-241,200	-134,000		
-73,800	-41,000	-602,095	-462,095
-470,354	-500,499	2,184,384	2,324,384
-400,000	-700,000		
-235,357	-530,631	7.50%	18.00%
-1,909,256	-1,909,256		
993,480	508,061		