Pricing proposal statement of compliance

Purpose

The purpose of this document is to specify in greater detail what information the AER needs to assess pricing proposals for compliance. The AER will consider this document as well as the models provided by the DNSP to be the formal pricing proposal.

General principles

- This document will replace the previous statement of compliance.
- This document should be replicated in the DNSP's report template and should be a separate document.
- We do not expect DNSPs to replicate information across the statement of compliance and the standardised model.
- DNSPs must explain changes made in comparison to the previous pricing proposal (for annual pricing proposals) and the approved determination (including any relevant final decision attachments and the tariff structure statement).
- DNSPs may opt to make further materials for stakeholders which can be submitted to and published by the AER, however these materials will not be subject to our review and not form part of the AER process. These materials can include customerfacing information about the proposal (i.e. documents in the same format as previous pricing proposal documents provided by DNSPs), cover letters, and price lists for different services.
- 'Initial pricing proposal' refers to pricing proposals that apply to the first year of the regulatory period. 'Annual pricing proposal' refers to pricing proposals for subsequent years of the regulatory period.
- Text in square brackets provide a space to be filled in by the DNSP. AER notes are in highlighted text and should be removed/replaced in the final document. Where reference is requested, footnote the AER's decision or the DNSP's documentation, including page numbers, where appropriate.

Pricing proposal statement of compliance template

Chapter 1: Introduction

This statement of compliance as well as the standardised SCS and ACS pricing models form Power and Water Corporation's pricing proposal for 2025-26.

Below is a full list of documents that form part of this proposal:

- Statement of compliance (this document)
- Power and Water Corporation Network Pricing Proposal 2025-26 31 March 2025 – Public
- Power and Water Corporation 2025-26 annual SCS pricing model 31 March 2025 – Public
- Power and Water Corporation 2025-26 annual ACS pricing model 31 March 2025 – Public

Chapter 2: Demand forecasts

Power and Water Corporation has provided quantity forecasts for standard control services in the 'Qty forecasts' sheet of the SCS pricing model.

In comparison to the previous network pricing proposal's forecast, the consumption volumes and customer numbers for the current regulatory year are similar.

Power and Water Corporation has used multiple sources to develop the 2025-26 forecasts including internal reports that extract data from our billing system (RMS), audited actuals from FY2024 as reported in the EB RIN, and smart meter data for our LV and HV major customers. Where data was unable to be sourced, assumptions in last year's network pricing proposal have been used for parameters such as consumption by 'time of use' segments.

For the upcoming regulatory year until the end of the current regulatory period, forecast trends set out in last year's network pricing proposal have been used as a base, except for major connections, where updated data on major connections has been considered. Further information is available in section 3.2 of our 2025-26 Network Pricing Proposal document.

Chapter 3: Tariffs

3.1 - Standard control services

The 'Tariff schedule' sheet of the SCS pricing model sets out the proposed 2025-26 prices for standard control services.

All tariff types remain in the same tariff class as the current tariff structure statement.¹ This is demonstrated in Tariff schedule 3 of the SCS pricing model within the same sheet.

All tariffs retain the same charging parameters as the current tariff structure statement.² This is also demonstrated in Tariff schedule 3 of the SCS pricing model. Below is a summary of each charging parameter:

Charging parameters	Unit	Explanation
System access charge	\$/day/NMI	A daily charge, charged at dollars per day, per NMI
Anytime energy	\$/kWh	Flat energy rate applied to all energy consumption
Super Off-peak energy	\$/kWh	Rate applied to customers with a smart meter consuming below 750MWh per year, applies:
		 9am to 3pm Monday to Sunday, all year.
Off-peak energy	\$/kWh	Rate applied to customers with a smart meter consuming below 750MWh per year, applies:
		 3pm to 9am Monday to Sunday from 1 April to 30 September, and 9pm to 9am Monday to Sunday from 1 October to 31 March, and 3pm to 9pm on weekends
Peak energy	\$/kWh	Rate applied to customers with a smart meter consuming below 750MWh per year, applies:
		 3pm to 9pm Monday to Friday (including public holidays) from 1 October to 31 March
On-season demand charge	\$/kVA	Rate applied to customers with a smart meter consuming above 750MWh per year, applies:
		 3pm to 9pm Monday to Friday (including public holidays) from 1 October to 31 March
Off-season demand charge	\$/kVA	Rate applied to customers with a smart meter consuming above 750MWh per year, applies:
		 3pm to 9pm Monday to Friday (including public holidays) from 1 April to 30 September

¹ Chapter 5, page 22 in <u>Power and Water Corporation's 2024-29 revised Tariff Structure Statement</u>.

² Chapter 5, page 22 in <u>Power and Water Corporation's 2024-29 revised Tariff Structure Statement</u>.

The expected weighted average revenue for each tariff class for the current and forecast years is demonstrated in Output table 5 of the SCS pricing model within the 'Tables' sheet.

3.2 - Alternative control services

The ACS pricing model sets out the proposed 2025-26 prices for alternative control services.

Power and Water has identified the same list of services for metering and ancillary network services as approved in the AER's final determination for alternative control services³. The list of services for metering and fee-based services is provided in the ACS pricing model. Quoted services are provided in line with the approved control mechanism formula⁴ using the applicable labour rates in the ACS pricing model.

3.3 - Tariff variations

We are not anticipating variations or adjustments to our tariff prices, tariff class or charging parameters within the 2025-26 period.

3.4 - Sub-threshold tariffs

Power and Water is not proposing sub-threshold tariffs for the regulatory year.

Chapter 4: Pricing principles

The revenue expected to be recovered from each tariff class lies on or between an upper bound representing the standalone cost of serving the retail customers who belong to that class and a lower bound representing the avoidable cost of not serving those retail customers. This is demonstrated in Compliance table 5 of the SCS pricing model within the 'Compliance' sheet. These bounds were calculated and approved as part of Power and Water's approved 5-year determination.

The sum of the revenue expected to be recovered from each tariff allows Power and Water to recover the expected revenue for the relevant services in accordance with the distribution. This is demonstrated in Compliance table 1 of the SCS pricing model within the same sheet.

Each tariff is based on the long-run marginal cost of providing the service to which it relates to the retail customers assigned to that tariff.

The long-run marginal cost estimates are unchanged from the current tariff structure statement.

³ Chapter 7, page 29 of <u>Power and Water Corporation 2024-29 revised Tariff Structure Statement</u>

⁴ <u>AER - Service Classification Guideline - 28 September 2018.pdf</u>

Chapter 5: Indicative prices

Revised indicative prices for standard control services tariffs are provided in Input tables 29 and 30 of the SCS pricing model within the 'Indicative prices' sheet. Revised indicative price caps for alternative control services are provided in the ACS pricing model. These indicative price levels have been determined in accordance with the current tariff structure statement and updated to account for this pricing proposal.

Chapter 6: Tariff components

6.1 - Distribution use of system charges

Tariffs designed to pass on distribution use of system charges are available in the 'Tariff schedule' sheet of the SCS pricing model. The revenue expected to be recovered from these tariffs does not exceed the estimated amount of distributed use of system charges adjusted for over or under recovery. This is demonstrated in Output table 6 of the SCS pricing model within the 'Tables' sheet.

The over or under recovery amount is calculated in a manner consistent with the AER's final decision for control mechanisms⁵.

6.2 - Designated pricing proposal charges

Power and Water is not proposing tariffs designed to pass on designated pricing proposal charges.

6.3 - System strength charges

Power and Water is not planning to pass through system strength charges for system strength connection points for the 2025-26 period.

6.4 - Jurisdictional scheme amounts

Power and Water is not proposing tariffs designed to pass on jurisdictional scheme amounts because it is not subject to a jurisdictional scheme.

Chapter 7: Compliance

7.1 - Compliance with the determination

We confirm that our tariff assignment policy and the methodology in which we review and assess the basis on which a customer is charged is unchanged from the current TSS and is compliant with the NER⁶.

There are no other material changes that should be brought to the attention of the AER.

Rule reference	Section reference
6.18.2(a)	This report and accompanying attachments constitute our pricing proposal for 2025-26.
6.18.8(a)(3)	Refer to section 3.2
6.18.2(b)(2)	6.18.2(b)(2)
	For SCS services see section 3.4
6.18.2(b)(3)	For ACS Metering services see section 4.2
6.18.2(b)(4)	For ACS Quoted services see section 4.3
	For ACS Fee based services see section 4.4
6.18.2(b)(5)	6.18.2(b)(3)
6.18.6	

7.2 - Compliance table

⁵ Appendix B, Attachment 14 Control Mechanisms, Final Decision Power and Water Corporation, 1 July 2024 to 30 June 2029

⁶ Chapter 5, page 22 in the final decision on <u>Power and Water Corporation's 2024-29 revised Tariff Structure Statement</u>.

6.18.1C 11.141.8	Refer to section 2.2 for description of charging parameters and elements of service that the charge relates to. See section 3.4 for the tariff rate that applies to each charging parameter. 6.18.2(b)(4) Refer to section 5.2.1 and Appendix E (SCS Pricing Model) 6.18.2(b)(5) Refer to section 5.2.2 6.18.6 Refer to section 5.2.1 6.18.1C Not applicable 11.141.8 Not applicable
6.18.5(e) 6.18.5(f) 6.18.5(g)(2) 6.18.2(d) 6.18.2(e) 6.18.2(b)(7A)	 6.18.5(e) Refer to section 5.1.2 6.18.5(f) Refer to section 5.1.3 6.18.5(g)(2) This is demonstrated in Appendix E (SCS pricing model) 6.18.2(d) This is set out at: Appendix A for SCS, Appendix B for ACS Metering, Appendix C for ACS Quoted Service, and Appendix D for ACS Fee Based Services. The underlying inputs, forecasts and calculations for SCS are contained in Appendix E for SCS and Appendix F for ACS. 6.18.2(e) We have not exercised our option under 6.18.1C. That is we have not sought the AER's approval for a new proposed tariff (a relevant tariff) that is outside of our approved TSS. 6.18.2(b)(7A)
6.18.2(b)(6) 6.18.2(b)(6B) 6.18.2(b)(6C) 6.18.7 6.18.7A	Refer to section 5.2.2 6.18.2(b)(6) Not applicable as Power and Water has no designated pricing proposal charges. This is confirmed in calculation of TAR in section 3.1. 6.18.2(b)(6B)

	Not applicable as Power and Water has no jurisdiction scheme amounts. This is confirmed in calculation of TAR in section 3.1.6.18.2(b)(6C) We have no system strength charge amounts as discussed in section 3.1 6.18.7 We have no designated pricing proposal charges as discussed in section 3.1. 6.18.7A We have no jurisdictional scheme amounts
	as discussed in section 3.1.
6.18.3	6.18.3 Refer to section 2.1
6.18.4	6.18.4 Refer to section 2.3
6.18.2(b)(7)	6.18.2(b)(7) This is set out in this compliance register,
6.18.2(b)(8)	with key elements such as Pricing Principles discussed in chapter 5 of Power and Water's TSS.
	Quantitative compliance is demonstrated in Appendix E (SCS Pricing Model). We have also demonstrated how our tariff strategy is consistent with the AER approved TSS published in April 2024. 6.18.2(b)(8)
	Refer to section 3 of this document which discusses the key inputs that drive the calculation of tariffs (sections 3.1, 3.2 and 3.3) and the tariff strategy that establishes changes at a tariff level to achieve the TAR.

I, *Taryn Maroney, General Manager, Regulation, Economics and Pricing*, confirm that the above statements are true and correct.

[signature]

31/03/2025 [date]