Draft decision

AusNet electricity distribution determination

1 July 2026 – 30 June 2031

Attachment 1 – Building block approach: Annual revenue requirement, Regulatory asset base, Regulatory depreciation and Corporate income tax

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AUSTRALIAN ENERGY REGULATOR

Inquiries about this publication should be addressed to:

Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601
Email: aerinquiry@aer.gov.au
Tel: 1300 585 165

AER reference: 23008246

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1 Building block approach

We determine the distributor's annual revenue requirement (ARR) using a building block approach. The efficient costs to be recovered by a distributor can be thought of as being made up of various building block costs. Our draft decision assesses each of the building block costs and the elements that drive these costs. The building block costs are approved reflecting trade-offs and interactions between the cost elements, service quality and across years.

Table 1.1 shows the building block costs that form the ARR for each year and where discussion on the elements that drive these costs can be found within this draft decision.

Table 1.1 Building block costs

Building block costs	Attachments where elements are discussed
Return on capital	Building block approach – Regulatory asset base (Attachment 1) Rate of return (Overview) Capital expenditure (Attachment 2)
Regulatory depreciation (return of capital)	Building block approach – Regulatory asset base (Attachment 1) Building block approach – Regulatory depreciation (Attachment 1) Capital expenditure (Attachment 2)
Operating expenditure	Operating expenditure (Attachment 3)
Estimated cost of corporate income tax	Building block approach – Corporate income tax (Attachment 1)
Other revenue adjustments	
Adjustments for shared assets	Building block approach – Annual revenue requirement (Attachment 1)
Operating efficiency benefits/penalties	Efficiency benefit sharing scheme (Attachment 5)
Capital efficiency benefits/penalties	Capital expenditure sharing scheme (Attachment 6)
Demand management innovation allowance	Demand management incentive scheme and Demand management innovation allowance mechanism (Attachment 8)

1.1 Annual revenue requirement

This section sets out our draft decision on AusNet's ARR and expected revenues for the provision of standard control services (SCS) over the 2026–31 regulatory control period. Specifically, it sets out our draft decision on:[1]

- the ARRs (unsmoothed), which are the sum of annual building block costs
- the total revenue requirement, which is the sum of the ARRs
- the annual expected revenues (smoothed)
- the X factors.

We determine the X factors by smoothing the ARR over the 2026–31 period. The X factor is used in the CPI–X methodology to determine the annual expected revenue (smoothed).[2]

1.1.1 Draft decision

We determine a total ARR of $4,431.1 million ($ nominal, unsmoothed) for AusNet over the 2026–31 period for SCS. This amount reflects our draft decision on the various building block costs and represents a reduction of $564.7 million (11.3%) to AusNet's proposed total ARR of $4,995.8 million. Our reductions to AusNet's forecast expenditure have driven a lower return on capital, operating expenditure (opex) and regulatory depreciation building blocks in this draft decision. Our draft decision on revenue adjustments also contributes to the lower ARR.

We determine the annual expected revenue (smoothed) and X factor for each regulatory year for the 2026–31 period by smoothing the ARRs. For the 2026–31 period, our draft decision is to approve total expected revenues of $4,428.3 million ($ nominal, smoothed) for AusNet.

At the time of making this draft decision, we have used placeholder values for certain components such as the rate of return, expected inflation and some expenditure forecasts. We will make further updates for these values as part of our final decision. It is for this reason that we expect the total expected revenues approved in our final decision to be different to this draft decision.

Table 1.2 sets our draft decision on the building block costs, the ARR, annual expected revenue and X factors for AusNet over the 2026–31 period.

1 NER, cll. 6.3.2(a)(1), 6.5.9(a) and 6.5.9(b)(1)–(2).

2 NER, cll. 6.2.6(a) and 6.5.9.

Table 1.2 AER's draft decision on AusNet's ARR, annual expected revenue and X factors for the 2026–31 period ($ million, nominal)

	2026–27	2027–28	2028–29	2029–30	2030–31	Total
Return on capital	371.5	386.7	403.1	422.1	445.5	2,029.0
Regulatory depreciation[a]	167.3	172.3	180.9	180.3	175.9	876.6
Operating expenditure[b]	299.1	311.2	322.9	338.0	353.5	1,624.6
Revenue adjustments[c]	–24.9	–15.0	–30.5	–38.9	10.1	–99.1
Cost of corporate income tax	0.0	0.0	0.0	0.0	0.0	0.0
Annual revenue requirement (unsmoothed)	813.0	855.3	876.4	901.5	985.0	4,431.1
Annual expected revenue (smoothed)	**818.7**	**850.9**	**884.3**	**919.1**	**955.3**	**4,428.3**
X factor[d]	n/a[e]	–1.35%	–1.35%	–1.35%	–1.35%	n/a

Source: AER analysis.

(a) Regulatory depreciation is straight-line depreciation net of the inflation indexation on the opening regulatory asset base (RAB).

(b) Includes debt raising costs.

(c) Includes revenue adjustments, where applicable, from the efficiency benefit sharing scheme (EBSS), the capital expenditure sharing scheme (CESS) and the demand management innovation allowance mechanism (DMIAM).

(d) The X factors will be revised annually to reflect the annual return on debt update. Under the CPI–X framework, the X factor measures the real rate of change in annual expected revenue from one year to the next. A negative X factor represents a real increase in revenue. Conversely, a positive X factor represents a real decrease in revenue.

(e) AusNet is not required to apply an X factor for 2026–27 because we set the 2026–27 expected revenue in this decision. The expected revenue for 2026–27 is around 10.4% lower than the approved total annual revenue for 2025–26 in real terms, or 8.1% lower in nominal terms.

1.1.2 Overview of proposal

AusNet proposed a total expected revenue (smoothed) of $4,990.7 million ($ nominal) for the 2026–31 period. AusNet's proposal sets out the details of its building block costs, the ARR, annual expected revenue and X factors over the 2026–31 period.[3]

1.1.3 Assessment approach

In appendix A.1, we discuss the building block approach used to determine the ARR and expected revenue for AusNet for each year of the 2026–31 period.[4]

1.1.4 Reasons for draft decision

We determine a total ARR of $4,431.1 million ($ nominal, unsmoothed) for AusNet over the 2026–31 period. This is a reduction of $564.7 million (11.3%) to AusNet's proposed total

[3] AusNet, *EDPR 2026-31 – PTRM Model – 310125 - PUBLIC*, January 2025, Revenue summary sheet – cells Q21. AusNet, *Electricity Distribution Price Review 2026–31 Regulatory Proposal*, January 2025, p. 84.

[4] NER, cll. 6.3.2(a)(1), 6.5.9(b)(2).

ARR of $4,995.8 million for this period. This reflects the impact of our draft decision on the various building block costs.

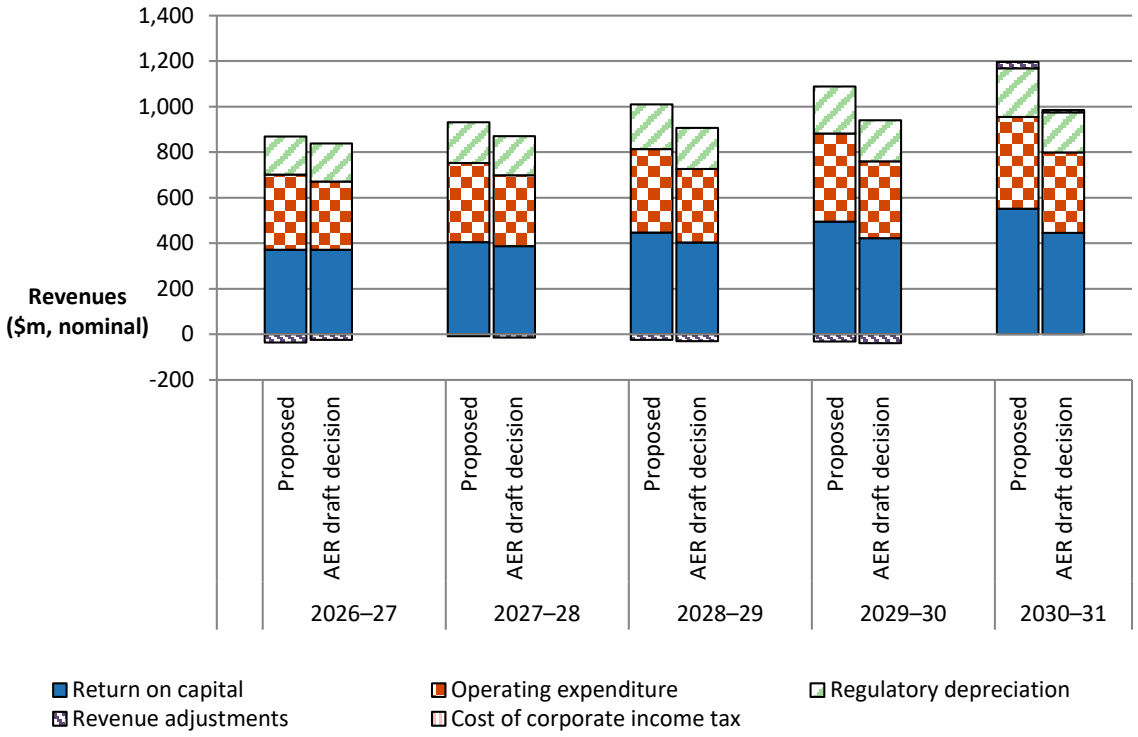
The changes we made to AusNet's proposed building blocks include (in nominal terms):

- A reduction in the return on capital of $239.7 million or 10.6% (section 1.2, Overview section 2.2 and Attachment 2). This is primarily driven by our draft decision to reduce AusNet's proposed forecast capital expenditure (capex) (Attachment 2). Our draft decision to apply a lower opening RAB as at 1 July 2026, and our update to the rate of return, have further reduced the return on capital building block.[5]
- A reduction in the regulatory depreciation of $89.2 million or 9.2% (section 1.3). This is primarily due to our draft decision to reduce AusNet's proposed forecast capex, which has reduced straight-line depreciation in the 2026–31 period. Our draft decisions to apply a lower opening RAB, and a higher expected inflation rate for the 2026–31 period, have further reduced the regulatory depreciation building block.
- A reduction in the opex forecast of $209.8 million or 11.4 % (Attachment 3). This is primarily driven by our reductions to AusNet's proposed step change amounts.
- A reduction in the revenue adjustments of $26.0 million (Attachments 5 and 6). This is driven primarily by our draft decision to determine a lower EBSS benefit and a higher CESS penalty compared to AusNet's proposal. Our draft decision also does not accept AusNet's proposed revenue adjustment for a 'network innovation fund' and it applies a lower DMIAM (Attachment 8).
- No change in the cost of corporate income tax of zero (section 1.4).

Figure 1.1 shows the building block components from our draft decision that make up the ARRs for AusNet, and the corresponding components from its proposal.

[5] For our draft decision, the nominal vanilla WACC for 2026–27 is higher than AusNet's proposal. However, averaged over the 2026–31 period, our draft decision nominal vanilla WACC is lower. This lower average WACC value over the period, therefore further reduces the return on capital building block in our draft decision relative to AusNet's proposal.

Figure 1.1 AER's draft decision and AusNet's proposed ARRs ($ million, nominal)



Source: AER analysis; AusNet, *EDPR 2026-31 – PTRM*, January 2025.
Note: Revenue adjustments include EBSS, CESS and DMIAM amounts. Opex includes debt raising costs.

1.1.4.1 X factor and annual expected revenue

To determine the profile of expected revenue for AusNet over the 2026–31 period, we have set the expected revenue for the first regulatory year at $818.7 million ($ nominal). This is $5.7 million higher than the ARR for that first year. We then apply an expected inflation rate of 2.55% per annum and a profile of X factors to determine the expected revenue in subsequent years.[6]

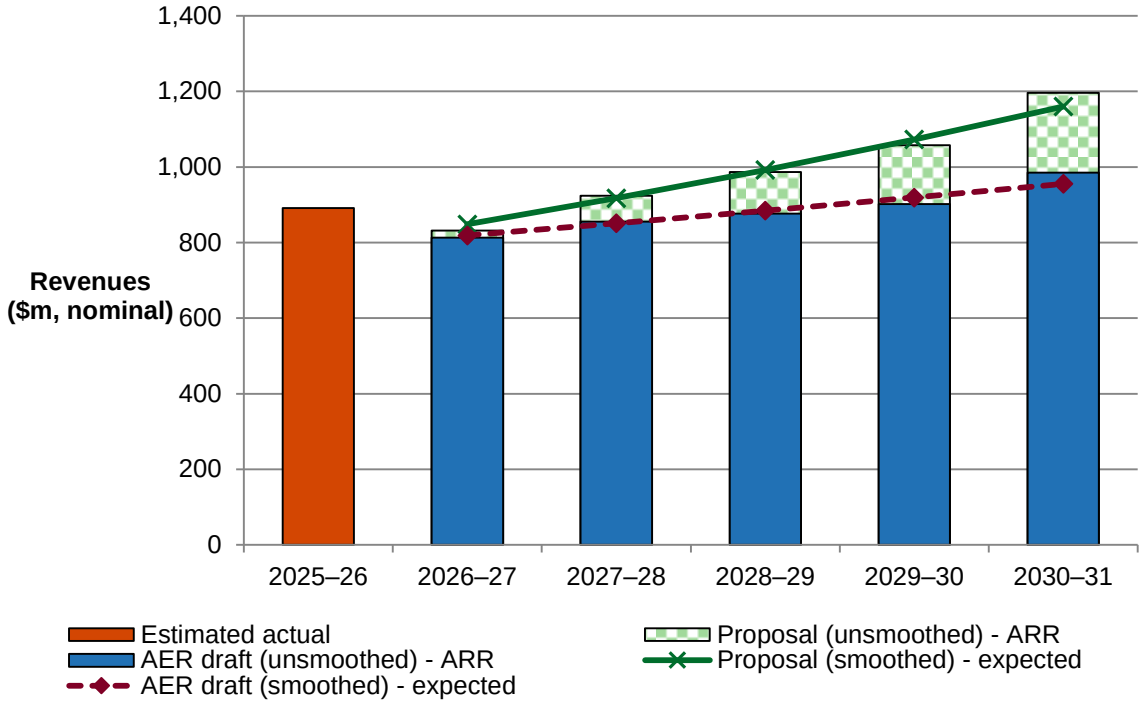
For this draft decision, we determine an X factor for AusNet of –1.35% per annum from 2027–28 to 2030–31.[7] The net present value (NPV) of the ARRs is $3,698.3 million ($ nominal) as at 1 July 2026. Based on this NPV and applying the CPI–X framework, we determine that the expected revenue (smoothed) for AusNet is $818.7 million in 2026–27 increasing to $955.3 million in 2030–31 ($ nominal). The resulting total expected revenue is $4,428.3 million for the 2026–31 period.

Figure 1.2 shows our draft decision on AusNet's annual expected revenue (smoothed revenue) and the ARRs (unsmoothed revenue) for the 2026–31 period.

6 NER, cl. 6.5.9(a).

7 AusNet is not required to apply an X factor for 2026–27 because we set the 2026–27 expected revenue in this decision.

Figure 1.2 AER's draft decision on AusNet's revenue for the 2026–31 period ($ million, nominal)



Source: AER analysis; AusNet, *EDPR 2026-31 – PTRM Model*, 31 January 2025.

The X factors we set must minimise, as far as reasonably possible, the variance between the expected revenue (smoothed) and the ARR (unsmoothed) in the last year of the 2026–31 period.[8] This helps to minimise any potential large revenue variance (and thus price shocks) at the commencement of the 2031–36 period. Our standard approach has been to keep a divergence of up to ±3% between the smoothed and unsmoothed revenues for the last year of the regulatory period. This is with the objective to achieve smoother price changes across regulatory control periods.

We did not receive any stakeholder submissions on AusNet's proposal that recommended an alternative revenue smoothing profile.[9]

For this draft decision, we approve lower revenues than AusNet's proposal. This is mainly driven by our reduction to AusNet's forecast capex and opex. As such, AusNet's unsmoothed revenue for the first year of the 2026–31 period (2026–27) is about 8.8% ($ nominal) lower than the approved revenue for the last year of the 2021–26 period (2025–26). We consider it appropriate to apply most of this reduction in setting the expected revenue for 2026–27.

Our draft decision allows for higher revenues than those determined in the 2021–26 period (discussed further below). As a result, AusNet's unsmoothed revenues for the remaining 4 years of the 2026–31 period increase by an average of 4.9% per annum. We are mindful that

8 NER, cl. 6.5.9(b)(2).

9 CCP32 advised the AER to consider the merits of a revised price path. CCP32, *Advice to the AER on the 2026–31 Regulatory proposal for AusNet Services electricity distribution network,* May 2025, p. 21.

revenue increases would have a significant impact on network charges for AusNet's customers. Consequently, we have smoothed the expected revenues by reducing the increases over the final 4 years of the 2026–31 period and passing on the appropriate reduction in 2026–27.

We consider that our profile of X factors results in an expected revenue in the last year of the 2026–31 period that is as close as reasonably possible to the ARR for that year.[10] We will review this smoothing profile for the final decision.

Our draft decision results in an average increase of 1.4% per annum ($ nominal) in the expected revenue over the 2026–31 period.[11] This consists of an initial reduction of 8.1% in 2026–27, followed by average annual increases of 3.9% during the remainder of the 2026–31 period.[12]

Our draft decision results in an increase of $852.3 million (23.8%) in nominal dollar terms to AusNet's total ARR for the 2026–31 period relative to that in the 2021–26 period. This is because:

- Approximately 57% of the increase is due to factors potentially outside the control of AusNet. This includes higher actual inflation rates for the 2021–26 period, which increase the indexation component of the RAB. It is also driven by a higher rate of return on equity and interest rates for the 2026–31 period, which lead to a higher forecast rate of return (Overview section 2.2). Together, these changes in market variables result in a much higher return on capital building block compared to the current period.
- The remaining 43% of the increase is driven by other factors. These include actual capex in the current 2021–26 period which is higher than the amount approved in the 2021–26 determination and forecast capex in the 2026–31 period which is driving further moderate growth in the forecast RAB in real terms.

1.1.4.2 Shared assets

AusNet submitted that its total revenue requirement is not subject to a shared asset adjustment because its forecast annual unregulated revenue from shared assets does not exceed the AER's materiality threshold.[13]

We consider AusNet's forecast unregulated revenues from shared assets for the 2026–31 period is reasonable. The forecast annual unregulated revenues from shared assets in the

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10 NER, cl. 6.5.9(b)(2). We consider a divergence of up to 3% between the expected revenue and ARR for the last year of the 2026–31 period is appropriate if this can promote smoother price changes for users across the period. In the present circumstances, based on the X factors we have determined for AusNet, this divergence is around 3.0%.

11 In real 2025–26 dollar terms, our approved expected revenue for AusNet results in an average reduction of 1.1% per annum over the 2026–31 period.

12 In real 2025–26 dollar terms, this consists of initial reduction of 10.4% in 2026–27, followed by annual average increases of 1.4% during the remainder of the 2026–31 period.

13 AusNet, *AusNet Electricity Distribution Price Review 2026–31 Regulatory Proposal,* January 2025, p. 88.

2026–31 period is broadly consistent with the annual unregulated revenues and the proportions of shared asset revenue to total revenue in the current period.[14]

AusNet's forecast unregulated revenues must be compared to the regulated revenues we determine, rather than those proposed by AusNet. Our draft decision sets lower expected revenues than AusNet's proposal. Based on these lower expected revenues, we determine that the materiality threshold is still not met in any year of the 2026–31 period. As such, our draft decision does not apply any shared asset revenue adjustment.[15]

1.1.4.3 Indicative average distribution price impact

Our draft decision on AusNet's expected revenues ultimately affects the prices consumers pay for electricity. There are several steps required in translating our revenue decision into indicative distribution price impacts.

We regulate AusNet's SCS under a revenue cap form of control. This means our draft decision on AusNet's expected revenues does not directly translate to price impacts. This is because AusNet's revenue is fixed under the revenue cap form of control, so changes in the consumption of electricity will affect the prices ultimately charged to consumers.

We are not required to establish the distribution prices for AusNet as part of this determination. However, we will assess AusNet's annual pricing proposals before the commencement of each regulatory year within the 2026–31 period. In each assessment we will administer the pricing requirements set in this distribution determination.

For this draft decision, we have estimated some indicative average distribution price impacts flowing from our determination on the expected revenues for AusNet over the 2026–31 period. In this section, our estimates only relate to SCS (that is, the core electricity distribution charges), not alternative control services (such as metering or public lighting). These indicative price impacts assume that actual energy consumption across the 2026–31 period matches AusNet's forecast energy consumption, which we have adopted for calculating the indicative price path. We note that AusNet's Coordination Group and the Consumer Challenge Panel (sub-panel 32) submitted that customer prices are heavily dependent on uncertain demand forecasts.[16] Consequently, we have tested the sensitivity of the price impacts to changes in forecast energy delivered at section 1.1.4.5. We have not factored in any changes arising from incentive scheme amounts, cost pass throughs or unders/overs reconciliation that usually occur in the annual pricing process to come up with the total allowed revenue.

Figure 1.3 shows AusNet's indicative distribution price paths over the period from 2021–22 to 2030–31 in real 2025–26 dollar terms based on the expected revenues established in our draft decision compared to AusNet's proposed revenue requirement. The indicative price

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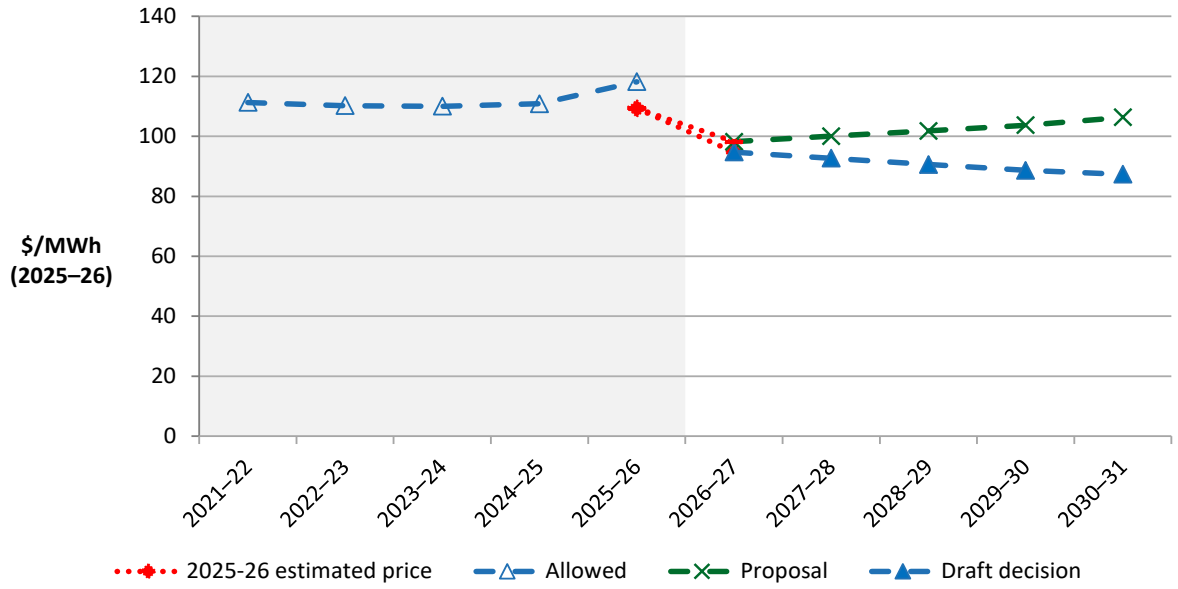
14 AER analysis; AusNet, RIN Workbook 1 – forecast-31 Jan 2025 – PUBLIC (sheet 7.4.1) and AusNet RIN Workbook 2 – historical-31 Jan 2025 (sheet 7.4.1).

15 We will reassess the materiality of the forecast shared asset unregulated revenues for our final decision.

16 AusNet Coordination Group, *Independent report on regulatory proposal 2026–31,* May 2025, p. 33; CCP32, *Advice to the AER on the 2026–31 Regulatory proposal for AusNet Services electricity distribution network,* May 2025, pp. 20–21.

path is estimated using the approved expected revenue and dividing by forecast energy consumption for each year of the 2021–26 period.

Figure 1.3 Indicative distribution price path for AusNet ($/MWh, 2025–26)



Source: AER analysis.

We estimate that our draft decision on AusNet's annual expected revenue will result in a reduction to average distribution charges of about 4.4% per annum over the 2026–31 period in real 2025–26 dollar terms.[17] This compares to the real average reduction of approximately 0.5% per annum proposed by AusNet over the 2026–31 period.[18] These high-level estimates reflect the aggregate change across the entire network and do not reflect the particular tariff components for specific end users.

Table 1.3 displays in nominal terms the comparison of the price impacts of AusNet's proposal and our draft decision.

[17] In nominal terms, we estimate average distribution charges to reduce by 1.9% per annum. This amount reflects an expected inflation rate of 2.55% per annum as determined in this draft decision.

[18] In nominal terms AusNet's proposal would increase distribution charges by 1.9% per annum. This amount reflects an expected inflation rate of 2.50% per annum as proposed by AusNet in its proposal.

Table 1.3 Comparison of price impact of AusNet's proposal and the AER's draft decision ($ nominal)

	2025–26	2026–27	2027–28	2028–29	2029–30	2030–31
AER draft decision						
Price path ($/MWh)[a]	109.3	97.1	97.5	97.7	98.1	99.1
Price path (change %)	–	–11.1%	0.3%	0.3%	0.3%	1.0%
AusNet's proposal						
Price path ($/MWh)[a]	109.3[b]	100.7	105.1	109.6	114.4	120.3
Price path (change %)	–	–7.9%	4.4%	4.3%	4.4%	5.1%

Source: AER analysis; AusNet, *EDPR 2026-31 – PTRM*, January 2025.
(a) The price path is in nominal terms and is constructed by dividing nominal expected revenue for SCS by forecast energy consumption for each year of the period.
(b) We updated AusNet's proposal for the approved total annual revenue from its annual pricing model for 2025–26. This was unavailable at the time AusNet lodged its proposal.

1.1.4.4 Expected impact of draft decision on electricity bills

The annual electricity bill for customers in AusNet's network reflects the combined cost of all the electricity supply chain components—wholesale energy generation, transmission, distribution, metering, and retail costs. This draft decision primarily relates to the distribution charges for AusNet's SCS, which represent on average approximately 35% of residential customers' annual electricity bills and 45% of small business customers' annual electricity bills in AusNet's network area.[19]

We estimate the expected bill impact by varying the distributions charges in accordance with our draft decision, while holding all other components—including the metering component—constant.[20] This approach isolates the effect of our draft decision on the SCS distribution charges only for AusNet. However, this does not imply that other components will remain unchanged across the period.[21]

Based on this approach, we expect that our draft decision on the distribution component will reduce the average annual residential electricity bill in 2030–31 by about $63 ($ nominal) or 3.3% from the 2025–26 total bill level. By comparison, had we accepted AusNet's proposal, the expected change in the distribution component would increase the average annual residential electricity bill in 2030–31 by about $67 ($ nominal) or 3.5% from the 2025–26 total bill level.

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19 AER analysis; AusNet, *2025–26 - Final - SCS pricing model*; Essential Services Commission, *Victorian Default Offer 2025–26: Decision Model*, 21 May 2025.

20 We also have not factored in any changes arising from incentive scheme amounts, cost pass throughs or unders/overs reconciliation that usually occur in the annual pricing process. The other components that make up a typical electricity bill are held constant at the levels established in the 2025–26 Victorian default offer.

21 It also assumes that actual energy consumption will equal the forecast adopted in our draft decision. Since AusNet operates under a revenue cap, changes in energy consumption will also affect annual electricity bills across the 2026–31 period.

Our estimated bill impact is based on the typical annual electricity usage of 4,000 kWh and for residential customers in AusNet's network.[22] Therefore, customers with different usage will experience different changes in their bills. We also note that there are other factors, such as metering, wholesale and retail costs, which affect electricity bills.

Similarly, for average small business customers in AusNet's network, we have estimated the bill impact for two customer categories:[23]

- consuming 10,000 kWh per annum, which the Essential Services Commission of Victoria (ESCV) noted as the 'representative' usage comparable to that adopted for default market offers in other jurisdictions
- consuming 20,000 kWh per annum, which the ESCV had historically adopted as average annual usage for small business customers in Victoria.

We expect that our draft decision on the distribution component will reduce the average annual electricity bill in 2030–31 for a small business customer (10,000 kWh) by about $187 ($ nominal) or 4.3% from the 2025–26 total bill level. By comparison, had we accepted AusNet's proposal, the expected change in the distribution component would increase the average annual small business electricity bill in 2030–31 by about $201 ($ nominal) or 4.6% from the 2025–26 total bill level.

Likewise, the distribution component is expected to reduce the average annual electricity bill in 2030–31 for a small business customer (20,000 kWh) by about $359 ($ nominal) or 4.3% from the 2025–26 total bill level. By comparison, had we accepted AusNet's proposal, the expected change in the distribution component would increase the average annual small business (20,000 kWh) electricity bill in 2030–31 by about $386 ($ nominal) or 4.7% from the 2025–26 total bill level.

Table 1.4 shows the estimated impact of our draft decision and AusNet's proposal on the average annual electricity bills for residential and small business customers in its network over the 2026–31 period.

Table 1.4 Estimated impact of AusNet's proposal and AER's draft decision on annual electricity bills for the 2026–31 period ($ nominal)

	2025–26[a]	2026–27	2027–28	2028–29	2029–30	2030–31
AER draft decision						
Residential (4,000 kWh consumption)	1,908	1,834	1,836	1,837	1,839	1,845
Annual change[b]	–	–74 (–3.9%)	2 (0.1%)	2 (0.1%)	2 (0.1%)	6 (0.3%)
Small business (10,000 kWh consumption)	4,398	4,175	4,182	4,186	4,192	4,211

22 Essential Services Commission, *Victorian Default Offer 2025–26: Decision Model*, 21 May 2025.

23 Essential Services Commission, *Victorian Default Offer 2025–26: Decision Model*, 21 May 2025.

	2025–26[a]	2026–27	2027–28	2028–29	2029–30	2030–31
Annual change[b]	–	–223 (–5.1%)	6 (0.1%)	5 (0.1%)	6 (0.1%)	19 (0.4%)
Small business (20,000 kWh consumption)	8,279	7,852	7,864	7,873	7,885	7,920
Annual change	–	–427 (–5.2%)	12 (0.2%)	9 (0.1%)	11 (0.1%)	36 (0.5%)
AusNet's proposal						
Residential (4,00 kWh consumption)	1,908	1,855	1,882	1,910	1,939	1,975
Annual change[b]	–	–53 (–2.8%)	27 (1.5%)	28 (1.5%)	29 (1.5%)	36 (1.9%)
Small business (10,000 kWh consumption)	4,398	4,240	4,321	4,404	4,492	4,599
Annual change[b]	–	–158 (–3.6%)	81 (1.9%)	83 (1.9%)	88 (2.0%)	107 (2.4%)
Small business (20,000 kWh consumption)	8,279	7,976	8,131	8,290	8,459	8,665
Annual change	–	–303 (–3.7%)	155 (1.9%)	159 (2.0%)	169 (2.0%)	206 (2.4%)

Source: AER analysis; AusNet, *EDPR 2026-31 – PTRM*, January 2025.

(a) Essential Services Commission, *Victorian Default Offer 2025–26,* 21 May 2025, pp. 12–14; Essential Services Commission, *Victorian Default Offer 2025–26: Decision Model*, 21 May 2025.

(b) Annual change amounts and percentages are indicative. They are derived by varying the distribution component of the 2025–26 bill amounts in proportion to yearly expected revenue divided by the forecast energy proposed by AusNet. Actual bill impacts will vary depending on electricity consumption and tariff class.

1.1.4.5 Sensitivity of forecast energy delivered on bills

The impact of our draft decision on customer bills is likely to change over the 2026–31 period. AusNet forecast the amount of annual energy delivered through its network will increase from 8,153 GWh in 2025–26 to 9,642 GWh in 2030–31, a significant increase of 1,489 GWh, or 18.3% over the period. This is the forecast that has informed the illustrative estimates of tariff and bill impacts in this draft decision. A variance in actual energy consumption, compared to that forecast by AusNet would lead to bill impacts that are higher or lower than what we have estimated.

Stakeholders welcomed the proposed moderate impact on customer bills. However, they raised concerns that the proposed increase in revenues were tied to proposed material forecast increases in electricity demand resulting in low estimated impacts on electricity

bills.[24] These stakeholders have highlighted there is a degree of uncertainty and risk around the demand forecasts proposed by AusNet, noting that if actual energy delivered over the 2026–31 period is less than forecast, distribution network tariffs and customer bills would be higher, all else being equal.[25] This is because AusNet operates under a revenue cap and is therefore entitled to recover the revenue we determine, regardless of the actual energy delivered.

For example, if energy delivered were to increase over the period at 40% of the rate forecast by AusNet, the modelled impact on average annual bills would be:[26]

- a nominal reduction of $1 (0.0%) by 2030–31 for a residential customer
- a nominal reduction of $2 (0.0%) by 2030–31 for a small business customer (10,000 kWh).

Figure 1.4 and Figure 1.5 respectively shows the average annual bill ($ nominal) for a residential customer and small business customer for a range of alternative energy delivered forecasts. This analysis models the bill impacts of our draft decision revenue using increments in the rate of growth of energy delivered forecasts up to the proposed level.[27] Under this range of energy delivered forecasts:

- a residential customer bill in 2030–31 ranges from $1,845 based on AusNet's proposed forecast energy delivered, to $1,931 based on forecast energy delivered at 20% of the proposed growth rate
- a small business customer (10,000 kWh) bill in 2030–31 ranges from $4,211 based on AusNet's proposed forecast energy delivered, to $4,466 based on forecast energy delivered at 20% of the proposed growth rate.

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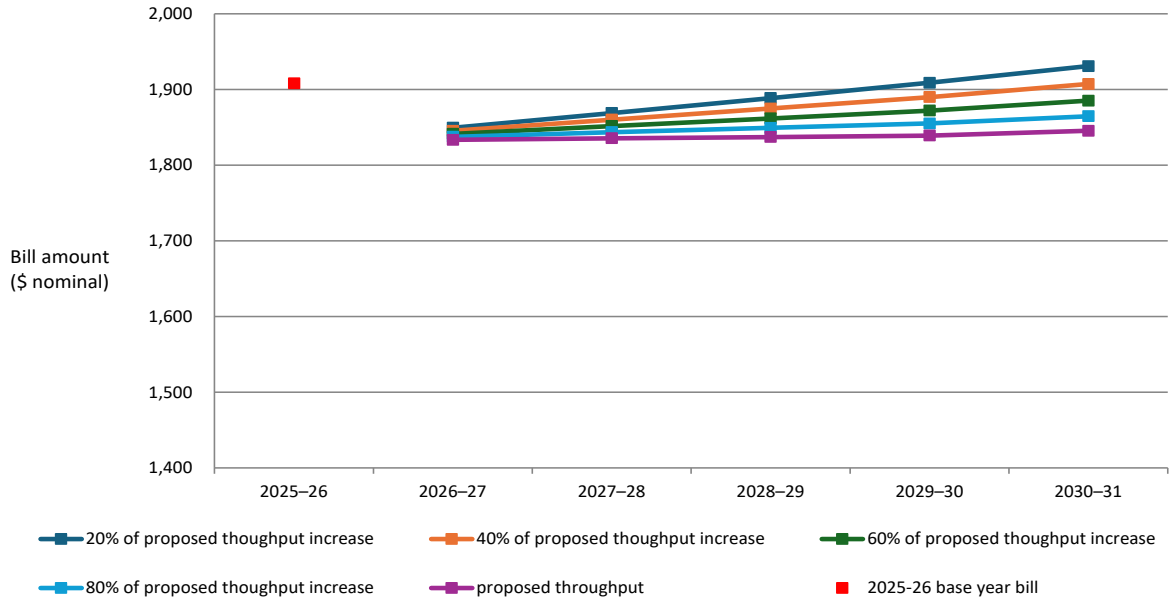
24 Hon Lily D'Ambrosio MP, *Issues Papers – Electricity Distribution Determination for 2026–31*, 3 June 2025, p. 1; CCP32, *Advice to the Australian Energy Regulator on the 2026–31 Regulatory Proposal for Powercor Electricity Distribution Network*, 14 May 2025, pp. *20–21*.

25 Hon Lily D'Ambrosio MP, *Issues Papers – Electricity Distribution Determination for 2026–31*, 3 June 2025, p. 1; CCP32, *Advice to the Australian Energy Regulator on the 2026–31 Regulatory Proposal for Powercor Electricity Distribution Network*, 14 May 2025, pp. 12–13.

26 This would therefore reflect energy throughput of 8,749 GWh in 2030–31, or an increase in energy throughput over the period of 7.3% compared to the 18.3% increase proposed by AusNet.

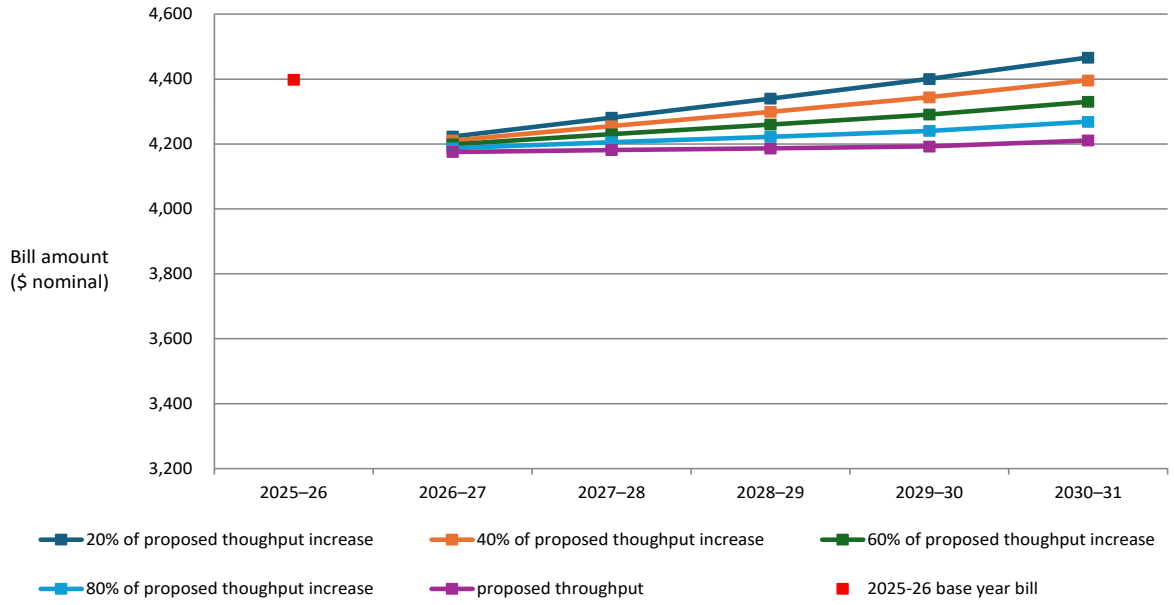
27 The forecast rate of growth of energy delivered proposed by AusNet has been reduced by increments of 20%. Starting with the proposed forecast energy delivered, we model 80%, 60%, 40% and 20% of the proposed forecast rate of growth in each year of the 2026–31 period.

Figure 1.4 Sensitivity of energy delivered on annual residential bills ($ nominal)



Source: AER analysis.

Figure 1.5 Sensitivity of energy delivered on small business (10,000 kWh) bills ($ nominal)



Source: AER analysis.

1.2 Regulatory asset base

The RAB is the value of the assets used by AusNet to provide SCS.[28] Our distribution determination specifies the RAB as at the commencement of the regulatory control period and the appropriate method for the indexation of the RAB.[29] The indexation of the RAB is one of the building blocks that form the ARR for each year of the 2026–31 period.[30] We set the RAB as the foundation for determining a distributor's revenue requirements and use the opening RAB for each regulatory year to determine the return on capital and return of capital (regulatory depreciation) building blocks.[31]

This section presents our draft decision on the opening RAB value as at 1 July 2026 for AusNet and our forecast of its RAB values over the 2026–31 period. It also presents our draft decision for establishing the RAB as at the commencement of the 2031–36 period using depreciation that is based on forecast capital expenditure (capex).[32]

1.2.1 Draft decision

We determine an opening RAB value of $6,129.0 million ($ nominal) as at 1 July 2026 for AusNet. This value is $16.0 million (0.3%) lower than AusNet's proposed opening RAB of $6,144.9 million ($ nominal) as at 1 July 2026.[33] This reduction is mainly due to the lower consumer price index (CPI) input we applied for 2025–26 in the roll forward model (RFM) to reflect the actual value.

As the RAB must be maintained in real dollar terms by indexing for inflation,[34] the 2025–26 CPI update results in a reduction to the opening RAB value as at 1 July 2026 by $32.9. million (0.5%) compared to AusNet, all else being equal.

We accept AusNet's proposed method for calculating the opening RAB. However, we have made some input amendments in the RFM (in addition to the CPI update), which offset the reduction from the CPI update and therefore affected the opening RAB value as at 1 July 2026.

To determine the opening RAB as at 1 July 2026, we have rolled forward the RAB over the 2021–26 period to determine a closing RAB value at 30 June 2026 in accordance with our RFM.[35] This roll forward process includes an adjustment at the end of the 2021–26 period to account for the difference between actual 2020 and half-year 2021 capex and the estimates approved in the 2021–26 determination.[36]

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28 NER, cl. 6.5.1(a).

29 NER, cl. 6.3.2(a)(1) and (2).

30 NER, cll. 6.4.3(a)(1) and (b)(1).

31 NER, cll. 6.4.3(a)(2) and (3).

32 NER, cl. 6.12.1(r).

33 AusNet, *EDPR 2026–31 – RFM,* January 2025.

34 NER, cll. 6.4.3(b)(1) and 6.5.1(e)(3).

35 AER, *Electricity distribution network service providers: Roll forward model (version 3.1)*, May 2022.

36 The end of period adjustment will be positive (negative) if actual capex is higher (lower) than the estimate approved at the 2021–26 determination.

Table 1.5 sets out our draft decision on the roll forward of AusNet's RAB over the 2021–26 period.

Table 1.5 AER's draft decision on AusNet's RAB for the 2021–26 period ($ million, nominal)

	2021–22	2022–23	2023–24	2024–25[a]	2025–26[b]
Opening RAB	4,657.4	4,766.2	5,005.5	5,505.4	5,886.5
Net capex[c]	344.0	333.6	387.3	456.2	447.7
Inflation on opening RAB	40.1	166.7	392.0	223.1	142.7
Less: straight-line depreciation[d]	275.4	261.0	279.4	298.1	304.8
Interim closing RAB	4,766.2	5,005.5	5,505.4	5,886.5	6,172.2
Difference between estimated and actual capex in 2020 and half-year 2021[e]	-	-	-	-	–35.5
Return on difference for 2020 and half-year 2021 capex[e]	-	-	-	-	–13.3
Final year asset adjustment[f]	-	-	-	-	5.6
Closing RAB as at 30 June 2026	**-**	**-**	**-**	**-**	6,129.0

Source: AER analysis.
(a) Based on estimated capex provided by AusNet. We will update the RAB roll forward with actual capex in the final decision.
(b) Based on estimated capex provided by AusNet. We expect to update the RAB roll forward with a revised capex estimate in the final decision, and true-up the RAB for actual capex at the next distribution determination.
(c) Net of disposals and capital contributions and adjusted for actual CPI and half-year weighted average cost of capital (WACC).
(d) Adjusted for actual CPI. Based on forecast capex.
(e) Includes the calendar year 2020 and the half-year period from 1 January 2021 to 30 June 2021.
(f) Includes adjustments for capitalised leases and opening asset value for critical spares as at 1 July 2026.

We determine a forecast closing RAB value as at 30 June 2031 of $7,119.5 million ($ nominal) for AusNet. This is $1,904.5 million lower than AusNet's proposed closing RAB value of $9,024.0 million ($ nominal).[37] This reduction is mainly due to our draft decision on forecast capex (Attachment 2). Our draft decisions on the opening RAB as at 1 July 2026 (section 1.2.4.1), the expected inflation rate (Overview section 2.2) and forecast depreciation (section 1.3) also affect the forecast closing RAB value as at 30 June 2031.[38]

[37] AusNet, *EDPR 2026–31 – PTRM,* January 2025.

[38] Capex enters the RAB net of forecast disposals and capital contributions. It includes equity raising costs (where relevant) and the half-year WACC to account for the timing assumptions in the PTRM. Therefore, our draft decision on the forecast RAB also reflects our amendments to the rate of return for the 2026–31 period (Overview section 2.2).

Table 1.6 sets out our draft decision on the forecast RAB values for AusNet over the 2026−31 period.

Table 1.6 AER's draft decision on AusNet's RAB for the 2026–31 period ($ million, nominal)

	2026–27	2027–28	2028–29	2029–30	2030–31
Opening RAB	6,129.0	6,324.7	6,529.8	6,721.1	6,910.3
Net capex[a]	363.0	377.4	372.2	369.5	385.0
Inflation on opening RAB	156.3	161.3	166.5	171.4	176.2
Less: straight-line depreciation	323.5	333.6	347.4	351.7	352.1
Closing RAB	6,324.7	6,529.8	6,721.1	6,910.3	7,119.5

Source: AER analysis.
(a) Net of forecast disposals and capital contributions. In accordance with the timing assumptions of the PTRM, the capex includes a half-year WACC allowance to compensate for the six-month period before capex is added to the RAB for revenue modelling.

Our draft decision is to apply the forecast depreciation approach to establish the opening RAB at the commencement of the 2031–36 period.[39] We consider this approach is consistent with the capex incentive objective in that it will provide sufficient incentives for AusNet to achieve capex efficiency gains over the 2026–31 period. This approach is also consistent with our *Framework and approach* (F&A) paper.[40]

1.2.2 Overview of proposal

AusNet used our RFM to establish an opening RAB as at 1 July 2026 and our post-tax revenue model (PTRM) to roll forward the RAB over the 2026–31 period. It proposed an opening RAB value as at 1 July 2021 of $4,657.4 million ($ nominal). Rolling forward this RAB with actual/estimated capex and using depreciation based on forecast capex approved for the 2021–26 period, AusNet proposed a closing RAB value of $6,144.9 million ($ nominal) as at 30 June 2026. AusNet's proposal sets out the details of its RAB roll forward over the 2021–26 period.[41]

AusNet proposed a forecast closing RAB as at 30 June 2031 of $9,024.0 million ($ nominal). This value reflects its proposed opening RAB, forecast capex, expected inflation, and depreciation (based on forecast capex) over the 2026–31 period. AusNet's proposal sets out the details of its RAB roll forward over the 2026–31 period.[42]

39 NER, cl. 6.12.1(r).

40 AER, *Framework and approach – AusNet Services, CitiPower, Jemena, Powercor and United Energy 2026−31,* July 2024, p. 22.

41 AusNet, *EDPR 2026–31 Regulatory proposal,* January 2025, p. 280; AusNet, *EDPR 2026–31 – RFM,* January 2025.

42 AusNet, *EDPR 2026–31 Regulatory proposal,* January 2025, p. 283; AusNet, *EDPR 2026–31 – PTRM,* January 2025.

For the final year (end of period) asset adjustment,[43] AusNet proposed to add a total of $5.6 million, comprising –$2.0 million for capitalised leases and $7.6 million for critical spares. The adjustment for capitalised leases primarily accounts for extensions and terminations of leases that occurred in the 2021–26 period for lease arrangements that were established prior to 1 July 2021. Further, the adjustment for capitalised leases accounts for the difference between actual and forecast leases in 2019, 2020 and half-year 2021. The adjustment for critical spares establishes an opening asset value as at 1 July 2026 based on the existing stock of critical spares that have not yet been included in the RAB. AusNet proposed a new asset class for 'Critical spares', which is discussed further in section 1.3.4.

AusNet's proposal did not specify the depreciation approach to be used to establish the RAB at the commencement of the 2031–36 period. However, AusNet supported the continuation of the approach to apply forecast depreciation during the development of the F&A for the 2026–31 determinations.[44] Applying forecast depreciation is consistent with the approach set out in our F&A.[45]

1.2.3 Assessment approach

In appendix A.2, we set out our assessment approach for the RAB.

1.2.4 Reasons for draft decision

We determine an opening RAB value of $6,129.0 million ($ nominal) as at 1 July 2026 for AusNet, a reduction of $16.0 million (0.3%) from the proposed value. We forecast a closing RAB value of $7,119.5 million by 30 June 2031. This represents a reduction of $1,904.5 million (21.1%) compared with AusNet's proposal. The reasons for our decision are discussed below.

1.2.4.1 Opening RAB as at 1 July 2026

We determine an opening RAB value of $6,129.0 million as at 1 July 2026 for AusNet. This value is $16.0 million (0.3%) lower than AusNet's proposed opening RAB of $6,144.9 million ($ nominal) as at 1 July 2026.[46] This reduction is mainly driven by the actual CPI for 2025–26 being lower than AusNet's estimate in its proposed RFM.

Figure 1.6 shows the key drivers of the change in AusNet's RAB over the 2021–26 period for this draft decision. Overall, the closing RAB value at the end of the 2021–26 period is forecast to be 31.6% higher than the opening RAB at the start of that period, in nominal terms. The new net capex increases the RAB by 42.3%, while inflation indexation increases it by 20.7%. Depreciation, on the other hand, reduces the RAB by 30.5%. End of period adjustments also reduce the RAB by 0.9%.

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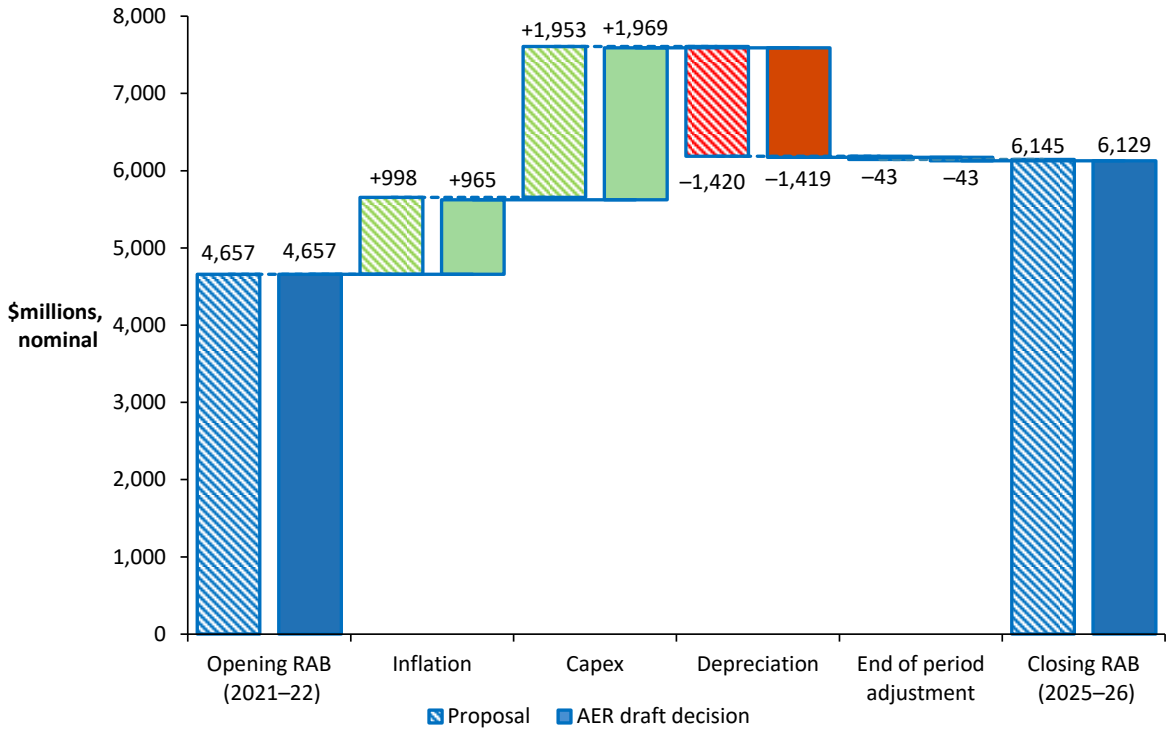
43 The final year asset adjustment section in the RFM is primarily for recording asset adjustments at the end of the current regulatory control period. This section is used when the distributor needs to adjust its closing RAB by removing or adding assets (such as for a change in service classification) in the final year of the regulatory control period.

44 AusNet, *Request to replace Framework and approach for 2026–31*, October 2023, p. 18.

45 AER, *Framework and approach – AusNet Services, CitiPower, Jemena, Powercor and United Energy 2026−31,* July 2024, p. 22.

46 AusNet, *EDPR 2026–31 Regulatory proposal,* January 2025, p. 283.

Figure 1.6 Key drivers of changes in the RAB over the 2021–26 period – AusNet's proposal compared with the AER's draft decision ($ million, nominal)



Source: AER analysis.
Note: Capex is net of disposals and capital contributions. It is inclusive of the half-year WACC to account for the timing assumptions in the RFM.

In the following sections we discuss our assessment of AusNet's proposed inputs in the RFM and the ex-post review of capex between calendar year 2020 and financial year 2023–24 for RAB roll forward purposes.

Key inputs in the RFM

To determine the opening RAB for AusNet as at 1 July 2026, we have rolled forward the RAB over the 2021–26 period to determine a closing RAB value as at 30 June 2026. In doing so, we reviewed the key inputs of AusNet's proposed RFM, such as actual inflation, rate of return, gross capex values, asset disposal values, capital contribution values, forecast depreciation and asset lives. We found these inputs were generally correct and reconcile with relevant data sources such as ABS data, annual reporting regulatory information notices (RINs) and the 2021–26 decision models.[47] However, we consider that some of AusNet's proposed RFM inputs require updating with newly available data and some require corrections.

[47] At the time of this draft decision, the roll forward of AusNet's RAB includes estimated capex values for 2024–25 and 2025–26. We expect to update the 2024–25 estimated capex with actuals in the final decision. We may also update the 2025–26 estimated capex with a revised estimate in the final decision.

Therefore, we have made the following amendments to AusNet's proposed RFM inputs, which impact the opening RAB value as at 1 July 2026:

- We updated AusNet's estimate of 2025–26 inflation of 3.00% with actual CPI of 2.42% published by the ABS, which became available after AusNet submitted its proposal. This value reflects the lagged CPI series and is calculated using the actual CPI between December 2023 to December 2024.
- We updated the nominal vanilla WACC for 2025–26 and forecast straight-line depreciation amounts. These updates are required to reflect the 2025–26 return on debt update in the PTRM for the 2021–26 period, which became available after AusNet submitted its proposal:
  - We also updated the forecast depreciation to account for additional straight-line depreciation associated with cost pass throughs that were recovered through C-factor adjustments in the annual pricing process. The additional capex associated with the approved cost pass throughs (June 2021, February 2024 and September 2024) increased the amount of forecast straight-line depreciation in the 2021–26 period.
- We amended capex inputs for:
  - minor adjustments to 2021–22 and 2023–24 to be consistent with the annual reporting RINs.
  - reallocating capex in 2023–24 to correct for an error in the allocation between the 'Distribution system assets' and 'Land' asset classes.[48]
  - changes in the accounting treatment for Software-as-a-Service (SaaS) expenditure in the 2021–26 period. In its annual reporting RINs, AusNet reported SaaS as opex instead of capex due to a change in the accounting treatment that occurred during the 2021–26 period. However, for the purposes of RAB roll-forward, actual SaaS expenditure should be reported in the RFM as capex to be consistent with how the capex forecast was treated in the 2021–26 determination. As such, we have updated the 'In-house software' asset class to include an additional $14.9 million ($ nominal) of capex. AusNet agreed with these changes.[49]
- We updated the capitalised lease costs being rolled into the RAB at the end of the 2021−26 period to –$2.0 million to reflect the updated WACC values.[50] We accept AusNet's proposed approach to capitalised leases, which is broadly consistent with the approach in its 2021–26 distribution determination. AusNet's proposed capitalised lease amounts at 1 July 2026 also reflect true-up adjustments for net capex. We are satisfied the proposed amount appropriately represents the present value of AusNet's existing leases as at 1 July 2026, adjusted for its net capex true-ups. We also accept AusNet's proposed remaining asset life of 3.3 years for depreciating existing leases as we consider it appropriately reflects the weighted average remaining terms of AusNet's existing leases as at 1 July 2026.

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48 AusNet, *EDPR 2026–31 – Response to information request IR037 – Q1,* June 2025.

49 AusNet, *EDPR 2026–31 – Response to information request IR037 – Q4,* June 2025.

50 The impact of the updated WACC values is $0.01 million and therefore, when rounded to 1 decimal place, the draft decision capitalised amount (–$2.0 million) is the same as AusNet's proposal.

We accept AusNet's proposed final year asset adjustment for establishing an opening RAB value for its proposed new asset class for critical spares, which was based on the existing stock of inventory not yet added to the RAB. We consider it is also appropriate that these assets are non-depreciable until placed into service, which would be when they are re-allocated to other asset classes that reflect the underlying asset.

Ex post review of 2020 to 2023–24 capex

We also consider the extent to which our roll forward of the RAB to 1 July 2026 contributes to the achievement of the capital expenditure incentive objective.[51] In the 2021–26 distribution determination,[52] we noted that the 2020 and half-year 2021 capex would form part of the review period for whether past capex should be excluded for inefficiency reasons in this distribution determination.[53] The capex for 2021–22 to 2023–24 also forms part of the review period.

Consistent with the requirements of the National Electricity Rules (NER) we have excluded the last 2 years of the 2021–26 period from the review of past capex for this distribution determination.[54] This approach ensures that actual capex (instead of estimated capex) is available when the review of past capex commences.

AusNet's total actual capex incurred from 2020 to 2023–24 is below the forecast allowance set at the previous relevant distribution determinations. Therefore, the overspending requirement for an efficiency review of past capex is not satisfied.[55]

Further, for the purposes of this draft decision, we have included estimated capex for 2024−25 and 2025–26 in the RAB roll forward to 1 July 2026. At the next distribution determination, the 2024–25 and 2025–26 capex will form part of the review period for whether past capex should be excluded for inefficiency reasons.[56] Our RAB roll forward applies the incentive framework approved in the previous distribution determination, which included the use of a forecast depreciation approach in combination with the application of the capital expenditure sharing scheme (CESS).[57] As such, we consider that the 2021–26 RAB roll forward contributes to an opening RAB (as at 1 July 2026) that includes capex that reflects prudent and efficient costs, in accordance with the capex criteria.[58]

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51 NER, cl. 6.12.2(b).

52 AER, *Final decision: AusNet Services distribution determination 2021–26 – Attachment 2 – Regulatory asset base,* April 2021, p. 6.

53 The 2016–20 regulatory control period was extended by half a year between 1 January 2021 and 30 June 2021 under the *National Electricity (Victoria) Act 2005*, s. 16VC. This half-year extension is treated as one regulatory year.

54 NER, cl. S6.2.2.A(a1).

55 NER, cl. S6.2.2A(c).

56 Here, 'inefficiency' of past capex refers to three specific assessments (labelled the overspending, margin and capitalisation requirements) detailed in NER, cl. S6.2.2A. The details of our ex-post assessment approach for capex are set out in AER, *Capital expenditure incentive guideline for electricity network service providers*, July 2024, pp. 12–19.

57 AER, *Final decision: AusNet Services distribution determination 2021–26 – Attachment 2 – Regulatory asset base,* April 2021, pp. 10–11.

58 NER, cll. 6.4A(a), 6.5.7(a), 6.5.7(c) and 6.12.2(b).

1.2.4.2 Forecast closing RAB as at 30 June 2031

We forecast a closing RAB value of $7,119.5 million ($ nominal) by 30 June 2031 for AusNet, which represents a reduction of $1,904.5 million (21.1%) compared to AusNet's proposed amount of $9,024.0 million ($ nominal).[59] The reduction reflects our draft decision on the inputs for determining the forecast RAB in the PTRM.

The change in the size of the RAB over the 2026–31 period depends on our assessment of its various components including forecast depreciation (section 1.3), expected inflation (Attachment X) and forecast capex (Attachment 2). Inflation and capex increase the RAB, while depreciation and disposals reduce it.

To determine the forecast RAB value for AusNet, we amended the following PTRM inputs:

- We reduced AusNet's proposed opening RAB value as at 1 July 2026 by $16.0 million ($ nominal) or 0.3% (section 1.2.4.1).
- We updated AusNet's proposed expected inflation rate of 2.50% per annum to 2.55% per annum over the 2026–31 period (Overview section 2.2). Compared to AusNet's proposal, our draft decision results in a reduction to the indexation of the RAB component for the 2026–31 period by $69.8 million ($ nominal) or 7.7%.[60]
- We reduced AusNet's proposed forecast straight-line depreciation for the 2026–31 period by $159.0 million ($ nominal) or 8.5% (section 1.3).
- We reduced AusNet's proposed forecast capex for the 2026–31 period by $1,977.7 million ($ nominal) or 51.4%.[61] Forecast net capex is a significant driver of the proposed increase in the RAB over the 2026–31 period. We received a submission from the Victorian state government which highlighted how the significant RAB uplift proposed by the Victorian distributors is a key driver of revenue and prices.[62] Our review of AusNet's forecast capex is set out in Attachment 2 of this draft decision.

Figure 1.7 shows the key drivers of the change in AusNet's RAB over the 2026–31 period for this draft decision. Overall, the closing RAB value at the end of the 2026–31 period is forecast to be 16.2% higher than the opening RAB at the start of that period, in nominal terms. The approved forecast net capex increases the RAB by 30.5%, while expected inflation increases it by 13.6%. Forecast depreciation, on the other hand, reduces the RAB by 27.9%.

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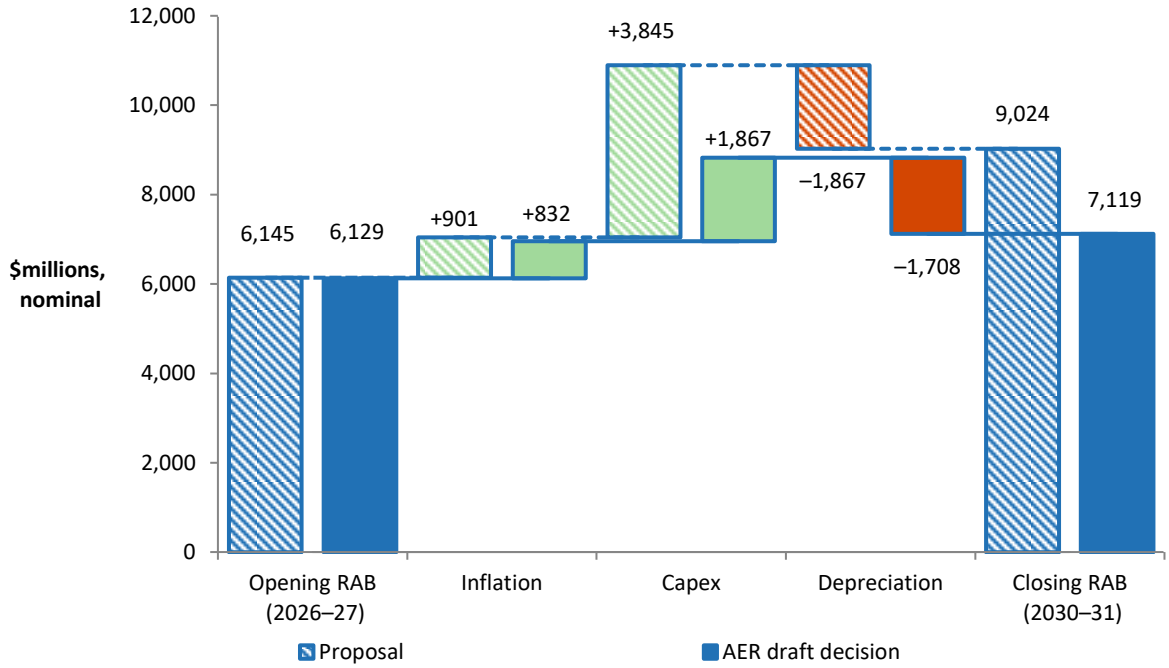
59 AusNet, *EDPR 2026–31 Regulatory proposal,* January 2025, p. 283.

60 The reduction in the indexation of the RAB is largely due to our draft decision to reduce forecast capex. This reduction is partially offset by the higher expected inflation rate used in our draft decision.

61 Capex is net of forecast disposals and customer contributions, and inclusive of half-year WACC adjustment.

62 Hon Lily D'Ambrosio MP, Minister for Climate Action, Energy and Resources, and the State Electricity Commission, *Submission - Victorian electricity distribution proposals 2026-31*, June 2025, p. 1.

Figure 1.7 Key drivers of changes in the RAB over the 2026–31 period – AusNet's proposal compared with the AER's draft decision ($ million, nominal)



Source: AER analysis.
Note: Capex is net of forecast disposals and capital contributions. It is inclusive of the half-year WACC to account for the timing assumptions in the PTRM.

1.2.4.3 Application of depreciation approach in RAB roll forward for the next distribution determination

We determine that the depreciation approach to be applied to establish AusNet's opening RAB at the commencement of the 2031–36 period will be based on the depreciation schedules (straight-line) using forecast capex at the asset class level approved for the 2026−31 period. We consider this approach will provide sufficient incentives for AusNet to achieve capex efficiency gains over the 2026–31 period.[63]

AusNet's proposal did not specify what depreciation approach to use in the roll forward of the RAB for the commencement of its 2031–36 period. However, we consider that the forecast depreciation approach should be used to establish the opening RAB as at 1 July 2031. This approach is consistent with the final F&A.[64]

We have used forecast depreciation for this draft decision when rolling forward the opening RAB at the commencement of the 2026–31 period (section 1.2.4.1). The use of forecast depreciation to establish the opening RAB for the commencement of the 2031–36 period at the next distribution determination therefore maintains the current approach.

As discussed in Attachment 6, AusNet is currently subject to the CESS for the 2021–26 period. We will continue to apply the CESS to AusNet over the 2026–31 period. We consider

63 NER, cll. 6.12.1(r) and S6.2.2B.

64 AER, *Framework and approach – AusNet Services, CitiPower, Jemena, Powercor and United Energy 2026−31,* July 2024, p. 22.

that the CESS will provide sufficient incentives for AusNet to achieve capex efficiency gains over that period. We are satisfied that the use of a forecast depreciation approach in combination with the application of the CESS and our other ex-post capex measures are sufficient to achieve the capex incentive objective.[65]

[65] Our ex-post capex measures are set out in the capex incentives guideline, AER, *Capital expenditure incentive guideline for electricity network service providers*, July 2024, pp. 12–19. The guideline also sets out how all our capex incentive measures are consistent with the capex incentive objective.

1.3 Regulatory depreciation

Regulatory depreciation is the amount provided so capital investors recover their investment over the economic life of the asset (return of capital). In deciding whether to approve the depreciation schedules submitted by AusNet, we make determinations on the indexation of the RAB and depreciation building blocks for AusNet's 2026–31 period.[66] The regulatory depreciation amount is the net total of the straight-line depreciation less the indexation of the RAB.

This section sets out our draft decision on AusNet's regulatory depreciation amount. It also presents our draft decision on the proposed depreciation schedules, including an assessment of the proposed standard asset lives used for calculating straight-line depreciation.

1.3.1 Draft decision

We determine a regulatory depreciation amount of $876.6 million ($ nominal) for AusNet for the 2026–31 period. AusNet proposed a regulatory depreciation amount of $965.8 million ($ nominal).[67] Our draft decision represents a reduction of $89.2 million (9.2%) from the proposed amount. This reduction is primarily the result of our draft decision to reduce AusNet's forecast capex.

Our reductions to forecast capex (Attachment 2) and the opening RAB at 1 July 2026 (section 1.2) have reduced both straight-line depreciation and the indexation of the RAB. Straight-line depreciation is further reduced by our draft decision changes to AusNet's standard asset lives (section 1.3.4.2). Overall, our draft decision has reduced:

- straight-line depreciation by $159.0 million (8.5%)
- indexation of the RAB by $69.8 million (7.7%).

The regulatory depreciation has reduced relative to AusNet's proposal because the reduction to straight-line depreciation more than offsets the reduction to the indexation of the RAB. The indexation of the RAB is reduced despite a higher expected inflation rate of 2.55% per annum in our draft decision compared to AusNet's proposal of 2.50% per annum (Overview section 2.2).[68]

For our draft decision on AusNet's regulatory depreciation:

- We accept AusNet's proposed straight-line depreciation method used to calculate the regulatory depreciation amount.

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66 Clause 6.12.1 of the National Electricity Rules (NER) sets out the 'constituent decisions' we must make as part of a distribution determination. We must decide whether or not to approve the depreciation schedules submitted by a Distribution Network Service Provider (cl. 6.12.1(h)). This is one of the building blocks we must use to determine the annual revenue requirement: cl. 6.4.3 of the NER.

67 AusNet, *EDPR 2026–31 Regulatory proposal,* January 2025, p. 86; and AusNet, *EDPR 2026–31 – PTRM,* January 2025.

68 All else being equal, a higher expected inflation increases the indexation of the RAB and therefore reduces regulatory depreciation.

- We accept AusNet's proposal to continue using the 'year-by-year tracking' approach for implementing straight-line depreciation of its existing assets and its forecast capex (section 1.3.4.1).
- We accept AusNet's proposed existing asset classes and standard asset lives. We also accept its proposed 5 new asset classes and standard asset lives (section 1.3.4.2).
- We introduce new asset classes for 'Concrete poles' and 'Non-network IT assets – long life', along with their standard asset lives applying to AusNet's forecast capex associated with these respective asset types (section 1.3.4.2).

We made determinations on other components of AusNet's proposal which affect the forecast regulatory depreciation—for example, the opening RAB at 1 July 2026 (section 1.2), expected inflation (Overview section 2.2), and forecast capex (Attachment 2) including its effect on the projected RAB over the 2026–31 period.[69]

Table 1.7 sets out our draft decision on the annual regulatory depreciation amount for AusNet's 2026–31 period.

Table 1.7 AER's draft decision on AusNet's forecast depreciation for the 2026–31 period ($ million, nominal)

	2026–27	2027–28	2028–29	2029–30	2030–31	Total
Straight-line depreciation	323.5	333.6	347.4	351.7	352.1	1,708.3
Less: inflation indexation on opening RAB	156.3	161.3	166.5	171.4	176.2	831.7
Regulatory depreciation	**167.3**	**172.3**	**180.9**	**180.3**	**175.9**	**876.6**

Source: AER analysis.

1.3.2 Overview of proposal

AusNet proposed a total forecast regulatory depreciation amount of $965.8 million ($ nominal) for the 2026–31 period. To calculate the depreciation amount, AusNet proposed to use:[70]

- the straight-line depreciation method employed in the AER's PTRM
- the closing RAB value at 30 June 2026 derived from the AER's RFM
- its forecast capex for the 2026–31 period
- an expected inflation rate of 2.50% per annum for the 2026–31 period

[69] Capex enters the RAB net of forecast disposals and capital contributions. It includes equity raising costs (where relevant) and the half-year weighted average cost of capital (WACC) to account for the timing assumptions in the PTRM. Our draft decision on the RAB (section 1.2) also reflects our updates to the WACC for the 2026–31 period.

[70] AusNet, *EDPR 2026–31 – RFM,* January 2025; AusNet, *EDPR 2026–31 – Depreciation tracking model,* January 2025; AusNet, *EDPR 2026–31 – PTRM,* January 2025.

- the AER's year-by-year tracking depreciation module in the RFM, which implements the straight-line method to calculate the forecast depreciation (over the 2026–31 period) of the opening RAB at 1 July 2026
- the same asset classes and standard asset lives for depreciating its forecast capex for the 2026–31 period, which are consistent with those approved in the 2021–26 distribution determination
- 5 new asset classes for the 2026–31 period comprising 'Non-network solutions', 'Heavy vehicles and plant', 'Critical spares – network assets', and 2 asset classes for capitalised leases (short term and long term).

AusNet's proposal sets out the details of its regulatory depreciation over the 2026–31 period.[71]

1.3.3 Assessment approach

In appendix A.3, we set out our assessment approach for regulatory depreciation.

1.3.4 Reasons for draft decision

We accept AusNet's proposed straight-line depreciation method for calculating the regulatory depreciation amount as set out in the PTRM. However, we have reduced AusNet's proposed forecast regulatory depreciation amount for the 2026–31 period by $89.2 million (9.2%) to $876.6 million ($ nominal).

This reduction is the result of our draft decisions on a lower forecast capex (Attachment 2), a lower opening RAB at 1 July 2026 (section 1.2), and the introduction of new longer lived asset classes (section 1.3.4.2), which have reduced straight-line depreciation. Our draft decision to apply a higher expected inflation rate of 2.55% per annum for the 2026–31 period compared to AusNet's proposal of 2.50% per annum (Overview section 2.2) has further reduced regulatory depreciation.[72]

In the following sections, we discuss our assessment of AusNet's proposal to continue using the year-by-year tracking depreciation approach, its proposed standard asset lives, and our draft decision to introduce new asset classes for 'Concrete poles' and 'Non-network IT assets – long life'.

1.3.4.1 Year-by-year tracking approach

AusNet proposed to continue using the year-by-year tracking approach for calculating the straight-line depreciation of its existing assets, consistent with that approved for its previous regulatory control periods.[73]

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71 AusNet, *EDPR 2026–31 – PTRM,* January 2025. AusNet, *Electricity Distribution Price Review 2026–31 Regulatory Proposal*, 31 January 2025. p.289

72 All else being equal, a higher expected inflation increases the indexation of the RAB and therefore reduces regulatory depreciation.

73 AER, *Final decision: AusNet Services distribution determination 2016–20 – Attachment 5 – Regulatory depreciation,* May 2016, pp. 11–12; and AER, *Final decision: AusNet Services distribution determination 2021–26 – Attachment 4 – Regulatory depreciation,* April 2021, p. 6.

For our draft decision, we accept AusNet's proposed year-by-year tracking approach meets the requirements of the NER in that it will result in depreciation schedules that:[74]

- reflect the nature of the assets and their economic life
- ensure that total depreciation (in real terms) equals the initial value of the assets, and
- allow the economic lives of existing assets to be consistent with those determined on a prospective basis in our 2021–26 distribution determination.

AusNet used our depreciation module in the RFM to implement year-by-year tracking. We have reviewed AusNet's application of this module and updated the inputs to be consistent with the amendments to the RFM, as discussed in section 1.2.4.1.

1.3.4.2 Standard asset lives

We accept AusNet's proposed standard asset lives for its existing asset classes used to depreciate the forecast capex to be incurred in the 2026–31 period. This is because they are consistent with those approved for the 2021–26 period and are largely comparable with the standard asset lives used by other network businesses for similar asset classes.

The standard asset life for the 'Equity raising costs' asset class needs to be reviewed each regulatory control period. We consider the standard asset life for this asset class should reflect the lives of the mix of assets making up the approved forecast net capex, because the equity raising cost benchmark is associated with that forecast.[75] However, consistent with AusNet's proposal, no equity raising costs have been determined in our draft decision modelling. This is because AusNet does not satisfy the PTRM requirements to incur benchmark equity raising costs associated with the approved forecast capex. Accordingly, we record the standard asset life as 'not applicable' in the PTRM for this draft decision.

In terms of new asset classes, AusNet proposed 5 new asset classes and we consider a further 2 new asset classes should be introduced. Below, we discuss the reasons for adding these new asset classes in the 2026–31 period.

Our assessment of AusNet's proposed new asset classes

We accept each of AusNet's proposed 5 new asset classes and the standard asset lives. Overall, we consider that separating these new asset classes from the existing asset classes improves transparency and enables the asset classes to be assigned standard asset lives that better reflects the economic life of the assets or groups of assets assigned to these classes than using existing asset classes. As such, this would lead to more accurate depreciation schedules. We discuss each of the new asset classes in turn below:

- **Critical spares – network assets**: AusNet proposed this new asset class because, to date, these assets have not been included in the RAB. There is no forecast capex associated with this asset class. We accept AusNet's proposed final year asset adjustment to establish the opening RAB for these assets based on the existing inventory of critical spares (see section 1.2.4.1). Due to the accounting treatment of

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74 NER, cl. 6.5.5(b).

75 For this reason, we used forecast net capex as the weights to establish the weighted average standard asset life for amortising equity raising costs.

critical spares, these assets are not assigned a standard asset life as they are non-depreciable until they are put into service. After which time, the assets are re-allocated to a suitable asset class for depreciation purposes. We consider the introduction of this new asset class is reasonable.

- **Non-network solutions:** AusNet proposed this new asset class for assets relating to improving network resilience, reliability and emergency response. The assets include various mobile generation assets (diesel generators, batteries, portable stations) as well as alternative storage technologies and operations models. The standard asset life of 15 years was based on choosing the higher end of the expected technical life of 10–15 years for the different asset types to be assigned to the asset class. We consider the proposed new asset class and standard asset life is within reasonable bounds because they are comparable assets and broadly consistent with asset classes used by other DNSPs.[76]
- **Heavy vehicles and plant**: AusNet proposed this new asset class with a standard asset life of 15 years to accommodate a variety of assets such as heavy trucks, elevated work platforms, trailers and forklifts. Historically, AusNet has had limited ownership of heavy vehicles due to its contracting of fleet management and operation. As such, AusNet proposed an opening asset value of zero. AusNet justified the proposed standard asset life with industry benchmarks for heavy commercial vehicles and trailers/plant.[77] We agree it is prudent to separate this new asset class from the existing asset class of 'Non-network general assets – other', which has a standard asset life of 5 years. Doing so more closely aligns the depreciation schedule to the expected economic life of the group of assets associated with heavy vehicles and plant.
- **Non-network leasehold land and buildings**: AusNet proposed 2 new asset classes for short-term and long-term capitalised leases, with standard asset lives of 5 years and 20 years, respectively. AusNet proposed these asset classes in response to our feedback during pre-lodgement engagement. AusNet proposed assigning a standard asset life of 5 years based on calculating the weighted average of the shorter lease terms. While AusNet did not propose any forecast capex for long-term leases in the 2026–31 period, it based the proposed 20-year standard asset life on an existing long-term lease for comparison. We consider the proposed asset classes and asset lives are appropriate.

New asset class for concrete and glass reinforced concrete (GRC) poles

We consider a new asset class for 'Concrete poles' should be introduced based on our review of AusNet's proposed poles capex (discussed in Attachment 2). Our draft decision is to assign a standard asset life of 80 years for this new asset class based on our assessment of the expected economic life for concrete and GRC poles.

The forecast capex associated with AusNet's proposed concrete and GRC poles were allocated across the existing asset classes of 'Subtransmission' and 'Distribution system

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76 SA Power Networks' 2025–30 capex for "Network resilience mobile generation" was assigned to several PTRM asset classes with a weighted average standard asset life of 10 years. Essential Energy's 2024–29 capex included investments with standard asset lives of 10 years (for "Batteries, inverters and control equipment") and 20 years (for "Generators"). Power and Water Corporation 2024–29 PTRM introduced an asset class for "Batteries" with a standard asset life of 10 years.

77 AusNet, *EDPR 2026–31 Regulatory proposal,* January 2025, p. 287.

assets' with standard asset lives of 45 years and 50 years respectively. We consider this forecast capex should be reallocated to a new asset class of 'Concrete poles' to provide for a depreciation schedule that better reflects the nature and economic life of this type of assets.[78] Based on our review of the material for the Victorian distributors, which suggests that the technical life for concrete poles can range from 60 to 100 years,[79] we consider that adopting the mid-point of this range of 80 years would reasonably reflect the expected life of concrete poles.

AusNet has agreed with including this new asset class for its concrete poles and our assigning a standard asset life of 80 years into the PTRM for the 2026–31 period.[80] However, AusNet disagreed with our assessment that the GRC composite poles should also have an 80 year asset life because it lacked sufficient experience and evidence of the expected asset life for GRC poles, having only installed this pole type since 2018.[81] We note that GRC is not a new technology, its performance is well understood, and its design life expectancy is 70–100 years.[82] As such, we consider that GRC poles are likely to have similar life expectancy to concrete poles.

We also note AusNet's proposed poles asset management strategy document refers to GRC's strength, durability and non-conductive properties.[83] In its response to our information request, AusNet stated that such characteristics referred to GRC's material properties but did not provide empirical evidence of service life of the poles.[84] However, we consider these characteristics would also apply to poles made from this material.

We acknowledge AusNet's concern about the relatively young age of its GRC pole population, but we consider the expected economic life of an asset type should reflect the expected design life. We also consider that while a small subset of any asset population could fail prematurely, e.g. due to a manufacturing issue, the asset type's design life appropriately reflects the expected outcome for the majority of the assets.

AusNet stated that a standard asset life of 80 years was higher than its accounting life of 50 years. While statutory accounting lives may be acceptable to recognise the depreciation of capex in financial accounts across multiple reporting periods, we do not recognise statutory accounting lives for the purpose of assigning an economic asset life for regulatory purposes. We consider the economic life of an asset is the estimated period after installation of the

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78 NER, cl. 6.5.5(b)(1).

79 CitiPower, *CP BUS 4.01 – Poles*, January 2025, p. 5; Powercor, *PAL BUS 4.01 – Poles*, January 2025, p. 5; United Energy, *UE BUS 4.01 – Poles*, January 2025, p. 5; AusNet Services, *Poles – Asset Strategy*, January 2025, p. 9; Jemena, *Att 05-01 Capital expenditure*, January 2025, p. 74.

80 AusNet, *EDPR 2026–31 – Response to information request #044 – Q13*, July 2025.

81 AusNet, *EDPR 2026–31 – Response to information request #044 – Q13*, July 2025.

82 Dulhunty Poles, *Titan poles*; and Martin Thomas, *Engineered cement poles – durability review,* May 2011, pp. 8–9.

83 AusNet, *EDPR 2026–31 – Regulatory proposal AMS – Electricity Distribution Network*, January 2025, pp. 6-7.

84 AusNet, *EDPR 2026–31 – Response to information request #047 (Confidential),* July 2025, p.2.

asset during which the asset will be capable of delivering the same effective service as it could at the time of installation.[85]

AusNet also submitted that increasing the standard asset life to 80 years would result in a lack of flexibility to reduce it in future, should sufficient evidence supporting a shorter standard asset life become available.[86] We consider that if sufficient evidence supporting an economic life shorter than 80 years is forthcoming in the future, we can reduce the standard asset life in the PTRM at that time. Further, we note that our RFM and depreciation tracking module templates could provide for the accelerated depreciation of existing assets due to reduced economic lives at that time, through a final year asset adjustment.[87]

For the reasons above, our draft decision combines the forecast capex for concrete and GRC poles into a single new asset class of 'Concrete poles' with a standard asset life of 80 years.

New asset class for long-lived IT assets

We also consider a new asset class for 'Non-network IT assets – long life' should be introduced based on our review of AusNet's proposed IT capex. Our draft decision is to assign a standard asset life of 10 years for this new asset class in the PTRM for the 2026–31 period.

AusNet's forecast IT capex is allocated to the existing IT asset classes of 'In-house software' and 'Non-network general assets – IT'. These asset classes are assigned standard asset lives of 5 years even though 72% of AusNet's forecast ICT capex is categorised as non-recurrent,[88] which relates to investments greater than 5 years.[89] Further, AusNet's cost-benefit analysis for many of its proposed digital investments shows that there are benefit streams up to FY2035 and FY2040 for advanced distribution management system (ADMS),[90] indicating that the capex is expected to have a longer life than 5 years.

AusNet's response to our information request identified that IT assets related to the ADMS would be suitable for adding to the new asset class. It submitted that assigning a standard asset life of 10 years would be appropriate for this new asset class.[91] Conversely, AusNet noted that the proposed incremental upgrades to its Enterprise Resource Platform (ERP) were different to another distributor's ERP full system replacement.[92] It therefore submitted that the ERP upgrade costs should not be allocated to the new longer life IT asset class.

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85 AER, *Better Regulation – Explanatory statement – Final regulatory information notices to collect information for category analysis*, March 2014, p. 50.

86 AusNet, *EDPR 2026–31 – Response to information request #047 (Confidential),* July 2025, p. 4.

87 AER, *Final decision, Electricity distribution network service providers – Roll forward model handbook version 3*, April 2020, pp. 21, 52.

88 AusNet, *EDPR 2027–31 Technology strategy and investment plan*, January 2025, p. 15.

89 AER, *Non-network ICT capex assessment approach*, November 2019, p. 9.

90 AusNet, *EDPR 2026–31 – Response to information request #001 – Q1 – EDPR 2027-31 Digital Program NPV model – Confidential,* February 2025.

91 AusNet, *EDPR 2026–31 – Response to information request #046 – Q1,* July 2025.

92 We assigned a 15 year standard asset life to Ausgrid's new asset class for 'ERP', see: AER, *Draft decision: Ausgrid distribution determination 2024–29 – Attachment 4 – Regulatory depreciation*, September 2023, p. 12.

Considering these points, our draft decision is to assign a standard asset life of 10 years for the new 'Non-network IT assets – long life' asset class. We accept that AusNet's IT portion of its ADMS forecast capex should be allocated to this new asset class. In its revised proposal, we encourage AusNet to consider if there are any other proposed IT investments that would be suitable for allocating to the new longer life IT asset class.

Our draft decision PTRM sets out AusNet's standard asset lives for each of its asset classes over the 2026–31 period.[93] We note the asset classes we have assigned with a standard asset life of 'n/a' (not applicable) is because the capex allocated to them is either not subject to depreciation, or they have zero forecast capex allocated to them. We are satisfied that our draft decision on depreciation conforms to the following:[94]

- the standard asset lives and depreciation approach more broadly would lead to a depreciation schedule that reflects the nature of the assets over the economic lives of the asset classes,
- the sum of the real value of the depreciation attributable to the assets is equivalent to the value at which the assets were first included in the RAB for AusNet, and
- the asset lives, and the depreciation methods and rates underpinning the calculation of depreciation for a regulatory control period are consistent with those determined for the same assets on a prospective basis.

93 AER, *Draft decision – AusNet distribution determination 2026–31 – SCS PTRM,* September 2025.

94 NER, cll. 6.5.5(b)(1)–(3).

1.4 Corporate income tax

Our determination of the ARR includes the estimated cost of corporate income tax for AusNet's 2026–31 period.[95] Under the post-tax framework, the cost of corporate income tax is calculated as part of the building block assessment using our PTRM. This amount allows AusNet to recover the costs associated with the estimated corporate income tax payable during the 2026–31 period.

This section presents our assessment of AusNet's proposed corporate income tax amount for the 2026–31 period. It also presents our assessment of its proposed opening tax asset base (TAB), and the proposed standard tax asset lives used to estimate tax depreciation for the purpose of calculating tax expenses.

1.4.1 Draft decision

We determine an estimated cost of corporate income tax amount of zero for AusNet over the 2026–31 period, consistent with AusNet's proposal. This is because we expect AusNet to incur a forecast tax loss in each year of the 2026–31 period.[96] We have determined that $77.9 million in tax losses as at 30 June 2031 will be carried forward to the 2031–36 period where it can be used to offset future tax liabilities. The forecast tax loss arises mainly because of the carry forward of AusNet's accumulated tax losses at 30 June 2026.

For our draft decision on AusNet's estimated cost of corporate income tax:

- We determine an opening TAB value of $3,954.1 million ($ nominal) as at 1 July 2026 for AusNet. This is $31.9 million (0.8%) higher than AusNet's proposed opening TAB value of $3,922.3 million as at 1 July 2026.[97] This is mainly due to our draft decision to include the capital contributions for gifted assets in the half-year 2021 (section 1.4.4.1).
- We accept AusNet's proposed approach for its forecast of immediately expensed capex, as it is broadly consistent with its 2021–26 distribution determination and the actual immediately expensed capex reported in the annual reporting RINs for years 2021–22 to 2023–24. However, we updated AusNet's proposed forecast immediately expensed capex for the 2026–31 period to reflect our draft decision on the total forecast capex (section 1.4.4.2).
- We accept AusNet's proposed forecast capex associated with buildings and in-house software for the 2026–31 period will be exempted from the diminishing value tax depreciation method. This maintains the approach approved in the 2021–26 determination of applying the straight-line tax depreciation method for these assets (section 1.4.4.3).
- We accept the final year asset adjustments for 'Non-network leasehold land & buildings – 1 July 2021' of –$1.6 million and 'Critical spares – network assets' of $7.6 million ($ nominal).

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95 NER, cl. 6.4.3(a)(4).

96 A forecast tax loss occurs when the forecast taxable income is lower than the forecast tax expense. In this event no tax is payable. Any residual amount of tax loss will be carried forward over to future regulatory control periods to offset future taxable income until the tax loss is fully exhausted.

97 AusNet, *EDPR 2026–31 – PTRM,* January 2025.

- We accept AusNet's proposed change to using the year-by-year depreciation tracking method as set out in our depreciation module in the RFM to calculate the forecast tax depreciation of its existing assets (section 1.4.4.4).
- We accept AusNet's proposed standard tax asset lives for its existing asset classes for the 2026–31 period. The proposed standard tax asset lives are broadly consistent with the tax asset lives prescribed by the Commissioner of Taxation in Australian Taxation Office (ATO) Taxation Ruling 2022/1 and/or are the same as the approved standard tax asset lives for the 2021–26 period (section 1.4.4.5).[98]
- We introduce a separate 'Concrete poles' asset class and assign a standard tax asset life of 45 years, which is consistent with the ATO Taxation Ruling 2022/1 (section 1.4.4.5).
- We also introduce a separate 'Non-network IT assets – long life' asset class and assign a standard tax asset life of 5 years, consistent with section 40-95(7) of the *Income Tax Assessment Act 1997* (ITAA) (section 1.4.4.5). Given the capex allocated to this asset class generally reflects the nature of an intangible depreciating asset, we will exempt the capex from the diminishing value tax depreciation method (section 1.4.4.3).
- We discuss a potential change to the tax treatment of forecast capital contributions from large customer connections by directly charging for the tax cost associated with their connections (section 1.4.4.6).

Our adjustments to the return on capital (section 1.2, Overview section 2.2) and the regulatory depreciation (section 1.3) building blocks affect revenues, which in turn impact the calculation of the cost of corporate income tax for this draft decision.

1.4.2 Overview of proposal

AusNet proposed an estimated cost of corporate income tax of zero for the 2026–31 period using our PTRM,[99] and with the following inputs:[100]

- an opening TAB value as at 1 July 2026 of $3,922.3 million ($ nominal).
- an expected statutory income tax rate of 30% per year
- a value of imputation credits (gamma) of 0.57
- forecast immediately expensed capex amount of $1,501.4 million ($2025–26)
- tax depreciation of the opening TAB as at 1 July 2026 for each asset class applying the year-by-year tracking approach calculated in the depreciation module of the RFM

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98 ATO, *Taxation Ruling TR2022/1 – Income tax: effective life of depreciating assets (applicable from 1 July 2022)*, June 2022.

99 Our published electricity PTRM uses the diminishing value tax depreciation approach for all new assets with the exception of in-house software, buildings (capital works) and equity raising costs. All assets acquired prior to 1 July 2021 will continue to be depreciated using the straight-line depreciation method for regulatory tax purposes, until these assets are fully depreciated. The PTRM also allows for the immediate expensing of certain capex for tax purposes.

100 AusNet, *EDPR 2026–31 – PTRM,* January 2025.

- the same standard tax asset lives for tax depreciation of new capex for its existing asset classes in the 2026–31 period as approved for the 2021–26 distribution determination
- standard tax asset lives set equal to the standard asset lives for its proposed new asset classes of 'Non-network solutions', 'Heavy vehicles and plant', 'Critical spares – network assets', and 2 asset classes for capitalised leases (short term and long term).

AusNet's proposal sets out the details of its cost of corporate income tax over the 2026–31 period.[101]

1.4.3 Assessment approach

In appendix A.4, we set out our assessment approach for the estimated cost of corporate income tax.

1.4.4 Reasons for draft decision

We determine the estimated cost of corporate income tax amount is zero for AusNet over the 2026–31 period, consistent with its proposal. AusNet has a forecast tax loss of $352.0 million at the beginning of the 2026–31 period.[102] This reduces to $76.2 million by the end of 2030–31. In the following sections, we discuss the reasons for our draft decision on:

- the opening TAB value as at 1 July 2026
- the forecast immediately expensed capex
- assets to be exempted from the diminishing value method for tax depreciation
- the year-by-year tracking approach for tax depreciation
- the standard tax asset lives for depreciating forecast capex over the 2026–31 period
- a potential change to the tax treatment of forecast capital contributions from large customer connections.

1.4.4.1 Opening tax asset base as at 1 July 2026

We accept AusNet's proposed method to establish the opening TAB value as at 1 July 2026. This is because AusNet's proposed approach is based on our RFM and consistent with that previously approved for the 2021–26 period. Based on the proposed approach, we determine AusNet's opening TAB value as at 1 July 2026 to be $3,954.1 million ($ nominal). This represents an increase of $31.9 million (0.8%) compared to AusNet's proposal, based on our input amendments discussed below.

As discussed in section 1.2.4.1, we approve AusNet's approach to roll in amounts for capitalised lease costs and critical spares into the asset base at the end of the 2021–26 period.

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101 AusNet, *EDPR 2026–31 Regulatory proposal,* January 2025, pp. 295–300; AusNet, *EDPR 2026–31 – PTRM,* January 2025.

102 This forecast tax loss as at 1 July 2026 is higher than the $342.4 million tax loss contained in AusNet's proposed PTRM. This is because the $352.0 million tax loss also reflects the September 2024 storms cost pass through and the 2025-26 return on debt update, which became available after the lodgment of AusNet's proposal. It also accounts for the June 2021 storm cost pass through.

For capitalised leases, our draft decision is to roll in a tax asset value of –$1.6 million ($ nominal) as at 1 July 2026, consistent with AusNet's proposal. We are satisfied this amount appropriately represents the present value of AusNet's existing leases as at 1 July 2026, adjusted for net capex true-ups. We also accept AusNet's proposed remaining tax asset life of 4.3 years for tax depreciation of this final year asset adjustment as we consider this appropriately reflects the weighted average remaining terms of AusNet's existing leases as at 1 July 2026.

For critical spares, our draft decision is to roll in a tax asset value of $7.6 million ($ nominal) as at 1 July 2026, consistent with AusNet's proposal. We are satisfied this amount appropriately reflects the existing stock of inventory not yet added to the asset base. Consistent with AusNet's proposal, we do not assign a tax asset life for these assets as we consider them to be non-depreciable until placed into service and re-allocated to other asset classes that reflect the underlying asset.

We have reviewed the inputs to the TAB roll forward and found they were mostly correct and reconciled with relevant data sources such as annual reporting RINs and the 2021–26 decision models. However, we amended the capex inputs in the RFM which impact the opening TAB as at 1 July 2026. These comprised:

- amendments to the capex inputs for years 2021–26 described in section 1.2.4.1
- an amendment to the half-year 2021 capex to account for the treatment of gifted assets, discussed further below.

We note that the opening TAB value as at 1 July 2026 will be updated as part of the final decision to reflect actual 2024–25 capex and any revised 2025–26 capex estimates.

Table 1.8 sets out our draft decision on the roll forward o f AusNet's TAB over the 2021–26 period.

Table 1.8 AER's draft decision on AusNet's TAB roll forward for the 2021–26 period ($ million, nominal)

	2021–22	2022–23	2023–24	2024–25[a]	2025–26[a]
Opening TAB	3,644.4	3,693.5	3,727.9	3,736.3	3,844.9
Capital expenditure[b]	362.2	348.3	392.8	487.1	493.0
Less: tax depreciation	313.1	313.9	384.3	378.5	389.8
Final year asset adjustment[c]					6.0
Closing TAB	**3,693.5**	**3,727.9**	**3,736.3**	**3,844.9**	**3,954.1**

Source: AER analysis.
(a) Based on estimated capex. We expect to update the TAB roll forward with actual capex for 2024–25 and a revised capex estimate for 2025–26 in the final decision.
(b) Net of disposals.
(c) Includes adjustments for capitalised leases and opening asset value for critical spares as at 1 July 2026.

Gifted assets for half-year 2021 extension period

During our pre-lodgement engagement with AusNet, we suggested that AusNet's $24.1 million in type 2 capital contributions (gifted assets) for half-year 2021 should be included in the TAB. AusNet disagreed with our proposed approach, submitting that its approach to exclude the gifted assets amount was consistent with the 2020 full Federal Court ruling and that including gifted assets would artificially increase AusNet's TAB leading to a $3.5 million increase in tax losses by the end of the 2026–31 period.[103]

Our approach to gifted assets is detailed in A.4.2. In 2020, the Full Federal Court ruled that gifted assets did not generate income for tax purposes.[104] Our standard approach applied to all networks to date has been to treat gifted assets consistently with the tax treatment applied at the time of the determination for the regulatory control period. We consider this approach avoids any windfall gains or losses due to differences in how forecast and actual gifted assets are treated. For our determinations made before the Court ruling, we treated gifted assets as assessable income for tax purposes. For determinations made after the Court ruling, we have not treated gifted assets as assessable income for tax purposes.

The half-year 2021 extension period determination was based on carrying forward the approach set out in the PTRM for the 2016–20 period.[105] For the 2016–20 determination, gifted assets were considered as assessable income for tax purposes and our position is that any actual gifted assets reported in the half-year 2021 extension period should therefore be included in the TAB roll forward to be consistent with how the forecast was determined.

While we acknowledge that AusNet's proposed approach is consistent with the Court ruling, it is not consistent with the tax treatment used in the 2016–20 period and the half-year 2021 extension period. Our draft decision therefore includes the $24.1 million gifted assets reported and allocated to the asset class of 'Distribution system assets' in the TAB roll forward. We have applied this same approach in our draft decisions for the other 4 Victorian distributors, which have agreed with and applied this approach.

We note the tax treatment of actual and forecast gifted assets for the 2021–26 period has been applied consistently with the Court ruling, as that determination was subsequent to the Court ruling. Our determination for the 2026–31 period will maintain this tax treatment.

1.4.4.2 Forecast immediately expensed capex

AusNet proposed $1,501.4 million ($2025–26) of forecast capex to be immediately expensed over the 2026–31 period.[106]

We consider AusNet's approach to forecast its immediately expensed capex to be reasonable. Its proposed amount is informed by its latest overhead rates and reflects the type of actual capex immediately expensed historically by AusNet.[107] This is consistent with

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103 AusNet, *EDPR 2026–31 Regulatory proposal,* January 2025, p. 299.

104 Federal Court of Australia, *Victoria Power Networks Pty Ltd v Commissioner of Taxation [2020] FCAFC 169*, 21 October 2020.

105 AER, *Final decision: AusNet Services – Six-month extension – variation decision*, October 2020, p. 3.

106 AusNet, *EDPR 2026–31 – PTRM,* January 2025.

107 AusNet, *EDPR 2026–31 Regulatory proposal,* January 2025, pp. 298-299. AusNet, *EDPR 2026–31 – SCS Capex model,* January 2025.

the approach taken during the 2021–26 determination. We note that the proposed forecast immediately expensed amount is about 39% of its total proposed forecast capex for the 2026–31 period. This is consistent with the average proportion of capex being immediately expensed over the period 2021–22 to 2023–24 as reported in the annual RINs, which is about 39%.

As discussed in Attachment 2, however, we have reduced AusNet's proposed forecast capex. Our draft decision is to therefore reduce the proposed amount of immediately expensed capex to reflect our draft decision on the overall forecast capex. This results in a lower forecast immediately expensed capex of $697.5 million for the 2026–31 period, a reduction of $803.8 million from the proposal.[108]

We will continue to collect actual data relating to this expenditure in our annual reporting RINs to inform our decision on the amount of forecast immediately expensed capex in the next determination for AusNet.

1.4.4.3 Assets exempt from the diminishing value method

The PTRM applies the diminishing value method as the regulatory benchmark for tax depreciation to all new capex. However, as discussed in appendix A.4, there are some exceptions to this approach under the tax law such as assets relating to in-house software, buildings (capital works) and equity raising costs.[109] In the PTRM, the benchmark equity raising costs is determined within the model and depreciated using the straight-line tax depreciation method as default.

AusNet proposed forecast capex associated with buildings (capital works) and in-house software for the 2026–31 period to be exempted from the diminishing value tax depreciation method. For the reasons discussed in Appendix A.4.2, we accept AusNet's proposal because the forecast capex satisfies the relevant definitions under the tax law.[110] Therefore, these assets will continue to be depreciated using the straight-line method for tax purposes, consistent with the approach applied in the 2021–26 determination.

Our draft decision is to exempt the new 'Non-network IT assets – long life' asset class from the diminishing value tax depreciation method. AusNet's proposed forecast capex for the IT portion of ADMS was allocated to the asset classes of 'Non-network general assets – IT' and 'In-house software', with the majority being portioned in the latter class. As discussed below (section 1.4.4.5) we have assigned a standard tax asset life of 5 years to the 'Non-network IT assets – long life' asset class, consistent with the requirement of section 40-95(7) of the ITAA.[111] Therefore, as the capex for this new asset class generally reflects the nature of an intangible depreciating asset, we will depreciate the 'Non-network IT assets – long life' asset class using the straight-line method for tax purposes.[112]

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108 We will conduct a further review of AusNet's calculation of immediately expensed capex and update to reflect our assessment of its forecast capex as part of our final decision.

109 Asset classes 47, 48, 49 and 50 in the PTRM provide for this.

110 ATO, *Taxation Ruling 2016/3*, October 2018; ATO, *Taxation Ruling 97/25*, July 2017; ITAA, section 995-1; ITAA, section 43-20.

111 ITAA, s. 40-95(7) – *Effective life of certain intangible depreciating assets*, viewed on 5 August 2025.

112 ITAA, ss. 40-72 & 40-95(7).

1.4.4.4 Year-by-year tracking approach

We accept AusNet's proposed change to using the 'year-by-year' tracking method as set out in our depreciation module in the RFM for calculating the tax depreciation of its existing assets as at 1 July 2026.[113]

The proposed method represents a change from the 'weighted average remaining life' approach previously adopted in the 2021–26 determination.[114] This change is required as a result of implementing the diminishing value tax depreciation method under the 2018 tax review at the 2021–26 determination.[115]

Under the diminishing value method, the tax depreciation of the capex for each year of a regulatory control period must be calculated individually. This could not be achieved under the weighted average remaining life approach previously applied by AusNet. Therefore, AusNet is required to switch to using the year-by-year tracking method to correctly calculate its tax depreciation of existing assets in the TAB as at 1 July 2026. Because of this change there will be no single set of remaining tax asset lives for each asset class at the start of the 2026–31 period.

For this draft decision, we have amended some of the depreciation module inputs to reflect those as set out in section 1.4.4.1 so that they are consistent with those made to the RFM. With these amendments, we are satisfied that the application of the year-by-year tracking method provides an appropriate estimate of the tax depreciation amount for a benchmark efficient service provider as required by the NER.[116]

1.4.4.5 Standard tax asset lives

We accept AusNet's proposed standard tax asset lives assigned to its existing asset classes because they are:

- broadly consistent with the tax asset lives prescribed by the Commissioner of Taxation in ATO Taxation Ruling 2022/1[117]
- the same as the approved standard tax asset lives for the 2021–26 period.

We accept AusNet's proposed approach to set the standard tax asset lives for its proposed new asset classes equal to be equal to their (RAB) standard asset lives. For the reasons

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113 AusNet, *EDPR 2026–31 Regulatory proposal,* January 2025, p. 296. Under this approach, the capex for each year of a regulatory control period is depreciated individually for tax purposes. It will result in each tax asset class having an expanding list of sub-assets to reflect the regulatory year in which capital expenditures on those assets occurred.

114 AER, *Final decision: AusNet Services distribution determination 2021–26 – Attachment 7 – Regulatory depreciation,* April 2021, p. 9. The weighted average remaining life method calculates the remaining tax asset life at the end of the regulatory control period by weighting together the remaining tax asset life at the start of that period with the capex incurred over that period.

115 AER, *Explanatory statement, Electricity transmission and distribution network service providers, Proposed amendments to the roll forward models (Distribution – version 3) (Transmission – version 4)*, December 2019, pp. 17–20.

116 Clause 6.5.3 of the NER sets out the formula we must use to estimate corporate income tax. It requires an estimate of the taxable income of a benchmark efficient entity.

117 ATO, *Taxation Ruling TR2022/1 – Income tax: effective life of depreciating assets (applicable from 1 July 2022)*, June 2022.

discussed in section 1.3.4.2, our draft decision is to accept these proposed new asset classes—comprising 'Non-network solutions', 'Heavy vehicles and plant', 'Critical spares – network assets', and 2 asset classes for capitalised leases (short term and long term)—and their proposed standard asset lives. We consider the proposed asset lives are appropriate for tax depreciation purposes as they reflect the expected economic lives of these asset classes. We are satisfied that this approach is consistent with the ATO's guidance on determining the effective life of an asset.[118] Our draft decision therefore accepts the following standard tax asset lives for AusNet's proposed new asset classes:

- 15 years for the 'Non-network solutions' asset class
- 15 years for the 'Heavy vehicles' asset class
- 5 years for the 'Non-network leasehold land & buildings – short term' asset class
- 20 years for the 'Non-network leasehold land & buildings – long term' asset class

Consistent with AusNet's proposal, we do not assign a standard tax asset life for the 'Critical spares – network assets' asset class as it reflects non-depreciating assets.

Also as discussed in section 1.3.4.2, our draft decision is to introduce 2 new asset classes for 'Concrete poles' and 'Non-network IT assets – long life' to provide a depreciation schedule that better reflects the nature and economic lives of these types of assets.

We consider the forecast capex for concrete poles and GRC poles should be allocated to a separate 'Concrete poles' asset class for depreciation instead of the existing asset classes of 'Subtransmission' 'Distribution system assets' proposed by AusNet. For tax depreciation purposes, we have assigned a standard tax asset life of 45 years for this new 'Concrete poles' asset class which is consistent with that prescribed by the Commissioner of Taxation in ATO Taxation Ruling 2022/1 for this asset type.[119]

We also consider the forecast capex for the IT portion of ADMS should be allocated to a separate 'Non-network IT assets – long life' asset class instead of the existing asset classes of 'Non-network general assets – IT' and 'In-house software'. Given the majority of this capex was allocated to the 'In-house software' asset class, we are satisfied that the expenditure generally reflects the nature of an intangible depreciating asset. We note that the tax law specifies that depreciating intangible assets such as in-house software should employ an effective life of 5 years. Therefore, our draft decision is to assign a standard tax asset life of 5 years for the new 'Non-network IT assets – long life' asset class as it is consistent with section 40-95(7) of the ITAA.[120]

Our draft decision PTRM sets out AusNet's standard tax asset lives for each of its asset classes.[121] We note the asset classes we have assigned with a standard tax asset life of 'n/a' (not applicable) is because the capex allocated to them is either not subject to depreciation,

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118 ATO, *Taxation Ruling TR2022/1 – Income tax: effective life of depreciating assets*, June 2022, Appendix Explanation, cll. 47–50, p. 9; ITAA, section 40-105.

119 ATO, *Taxation Ruling TR2022/1 – Income tax: effective life of depreciating assets (applicable from 1 July 2022)*, June 2022, Table A, p. 175.

120 ITAA, s. 40-95(7).

121 AER, *Draft decision– AusNet distribution determination 2026–31 – SCS PTRM,* September 2025.

or they have zero forecast capex allocated to them. We are satisfied that the standard tax asset lives are appropriate for application over the 2026–31 period. We are also satisfied that the standard tax asset lives provide an estimate of the tax depreciation amount that would be consistent with the tax expenses used to estimate the annual taxable income for a benchmark efficient service provider.[122]

1.4.4.6 Tax treatment of forecast capital contributions from large customer connections

Our draft decision is to adopt the same tax treatment for type 1 capital contributions (cash) from large customer connections for the 2026–31 period as that employed for the 2021–26 period. For regulatory tax purposes and consistent with tax law, type 1 capital contributions paid by customers (including large load connections) to the distributor, are recognised as income. This results in a tax liability for the distributor and is recovered from the broader SCS customer base. The depreciation of the capital contributions may be claimed as tax deductions over time to offset future income and therefore lower the tax liability in future regulatory control periods. This net tax liability is ultimately paid for by the broader SCS customer base.

As discussed in Attachment 16, we anticipate that AusNet will amend its proposed connection policy in the revised proposal to remove what is an effective cross subsidy of tax costs associated with capital contributions from connecting data centres and other large load customers. This change would mean that the net tax liability from these connections would be added to the capital contribution amount paid by the connecting customer for the 2026–31 period. The net tax liability would, therefore, be borne by the connecting customer rather than the broader SCS customer base. All else being equal, this change would reduce the forecast capital contributions and gross capex in the PTRM for the 2026–31 period and therefore reduce the cost of corporate income tax for SCS customers.[123] Our assessment of this matter remains ongoing and AusNet has indicated it will engage further on this issue with its stakeholders ahead of lodging its revised proposal in December 2025.

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122 NER, cl. 6.5.3.

123 In the event of zero cost of corporate income tax, this change would, all else being equal, increase the size of the forecast tax loss over the 2026–31 period, allowing for a reduced cost of corporate income tax in a future distribution determination.

A Appendix

A.1 Annual revenue requirement – assessment approach

The ARR must be determined using a building block approach.[124] Therefore, we adopt a building block approach when making our decision on the distributor's total ARR and expected revenue for each regulatory year of the regulatory control period. Under this approach, we determine the value of the building block costs that make up the ARR for each regulatory year. The ARR for each year is the sum of the building block costs. These building block costs are set out in section 1.

A.1.1 Calculating the ARR and expected revenue in the PTRM

The ARR is calculated using the PTRM.[125] For the applicable control mechanism (Attachment 12) applying to SCS, the revenue to be earned by the distributor (expected revenues) for the regulatory control period must be equal to the NPV of the total revenue requirement.[126] The total revenue requirement is the sum of the ARRs for the regulatory control period.

We developed the PTRM, which brings together the various building block costs and calculates the ARR for each year of the regulatory control period.[127] The PTRM also calculates the X factors required under the CPI–X methodology[128] which is used to escalate the expected revenue for each year (other than the first year) of the regulatory control period.[129] Using the X factors and ARR, the annual expected revenue (smoothed) is forecast for each year of the regulatory control period. The distributor's proposal must be prepared using our PTRM.[130]

The ARR can be lumpy over the regulatory control period. To minimise price shocks, revenues are smoothed within a regulatory control period while maintaining the principle of cost recovery under the building block approach. Smoothing requires diverting some of the cost recovery to adjacent years within the regulatory control period so that the NPV of the annual expected revenue (smoothed revenues) is equal to the NPV of the ARR (unsmoothed revenues). That is, a smoothed profile of the expected revenue is determined for the regulatory control period under the CPI–X methodology.

The expected revenue for the first year is generally set equal to the ARR for the first year of the regulatory control period. At times, it may be more appropriate to set the expected

124 NER, cl. 6.4.3.

125 NER, cl. 6.4.2.

126 NER, cl. 6.5.9(b)(3)(i).

127 NER, cl. 6.4.2.

128 NER, cl. 6.2.6(a).

129 NER, cl. 6.5.9.

130 NER, cl. 6.3.1(c).

revenue for the first year to align with the revenue from the last year of the previous regulatory control period to avoid any large revenue variation between periods (or P_0).[131]

For a determination, we first calculate the ARR for each year of the regulatory control period. To do this we consider the various costs facing the distributor and the trade-offs and interactions between these costs, service quality and across years. This reflects our holistic assessment of the distributor's proposal.

We understand the trade-offs that occur between building block costs and test the sensitivity of these costs to their various driver elements. These trade-offs are discussed in the interrelationships section of the various attachments to this draft decision and are reflected in the calculations made in the PTRM.[132] Such understanding allows us to exercise judgement in determining the final inputs into the PTRM and the ARR that result from this modelling.

A.1.2 Revenue smoothing

In determining the total revenue requirement for the regulatory control period, we smooth the ARR for each regulatory year across that period. This step reduces revenue variations between years, and calculates the expected revenue and X factor for each year.[133] The X factors equalise (in NPV terms) the total expected revenues to be earned by the distributor with the total revenue requirement for the regulatory control period.[134] The X factor profile must also minimise, as far as reasonably possible, the variance between the expected revenue and ARR for the last regulatory year of the period.[135] By minimising this divergence, it helps to manage the prospect of a significant revenue change (and consequently prices) between the last year of the regulatory control period, and first year of the following regulatory control period. We consider a divergence of up to 3% between the expected revenue and ARR for the last year of the regulatory control period is reasonable, if this can promote smoother price changes across the regulatory control periods.

A.1.3 Shared assets

Distributors may use assets to provide both the SCS we regulate and unregulated services, for example by the stringing of telecommunications cables on the electricity network poles for the provision of telecommunication services. These assets are called 'shared assets'.[136] If the revenue from shared assets is material, 10% of the unregulated revenues that a

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131 The expected revenue for year 1 of the next regulatory control period may include adjustments for the performance incentive that applied during the previous regulatory control period, and under or over recovery adjustments from previous regulatory years.

132 There are trade-offs that are not modelled in the PTRM but are reflected in the inputs to the PTRM. For example, service quality is not explicitly modelled in the PTRM, but the trade-offs between service quality and price are reflected in the forecast capital expenditure and operating expenditure inputs to the model. Other trade-offs are obvious from the calculations in the PTRM. For example, while it may be expected that a lower RAB would also lower revenues, the PTRM shows that this will not occur if the reduction in the RAB is due solely to an increase in the depreciation rate. In such circumstances, revenues increase as the increased depreciation more than offsets the reduction in the return on capital caused by the lower RAB.

133 NER, cl. 6.5.9(a).

134 NER, cl. 6.5.9(b)(3)(i). The X factors represent the real revenue path over the regulatory control period under the CPI–X framework.

135 NER, cl. 6.5.9(b)(2).

136 NER, cl. 6.4.4.

distributor earns from shared assets will be used to reduce the distributor's revenue for SCS.[137]

The shared asset principles establish that use of shared assets should be material before cost reductions are applied.[138] The NER does not define materiality in this context. Our approach to what constitutes a material use of shared assets is that unregulated use of shared assets in a specific regulatory year is material when a distributor's annual average unregulated revenue from shared assets is expected to be greater than 1% of its expected revenue for that regulatory year.[139]

A.2 Regulatory asset base – assessment approach

We roll forward the distributor's RAB over the regulatory control period to arrive at an opening RAB value at the start of the next regulatory control period. This value must be adjusted for any differences in estimated and actual capex.[140] It may also be adjusted to reflect any changes in the use of the assets, with only assets used to provide SCS to be included in the RAB.[141]

A.2.1 Rolling forward the RAB in the RFM

To determine the opening RAB at the start of the next regulatory control period, we developed an asset base RFM that a distributor must use in preparing its regulatory proposal.[142] We use the RFM to roll forward the distributor's RAB from the beginning of the final year of the previous regulatory control period, through the current regulatory control period, to the beginning of the next regulatory control period.

The roll forward for each year of the above periods occurs by:

- adding actual inflation (indexation) adjustment to the opening RAB for the relevant year. This adjustment is consistent with the inflation factor used in the control mechanism.[143]
- adding actual or estimated capex to the RAB for the relevant year.[144] We review a distributor's past capex and may exclude past capex from being rolled into the RAB where total capex exceeds the regulatory allowance.[145] The details of our assessment approach for capex overspending are set out in the *Capital expenditure incentive guideline*.[146] We note that our review of past capex does not include the last 2 years of the current regulatory control period—these will instead be reviewed at the next

137 AER, *Shared asset guideline*, November 2013, Appendix A, p. 15.

138 NER, cl. 6.4.4(c)(3).

139 AER, *Shared asset guideline*, November 2013, pp. 8–9.

140 NER, cl. S6.2.1(e)(3).

141 NER, cl. S6.2.1(e)(7).

142 NER, cll. 6.5.1(b), 6.5.1(e), S6.1.3(7); AER, *Electricity distribution network service providers: Roll forward model version 3.1*, May 2022.

143 NER, cl. 6.5.1(e)(3).

144 NER, cl. S6.2.1(e)(4).

145 NER, cl. S6.2.2A. Under the NER, cl. S6.2.2A(b), the exclusion of inefficient capex could only come from three areas: overspend in capex, margin paid to third party and capitalisation of opex as defined in cll. S6.2.2A (c), (d) and (e) of the NER.

146 AER, *Capital expenditure incentive guideline for electricity network service providers,* July 2024, pp. 12–19.

distribution determination.[147] We check actual capex amounts against audited annual reporting regulatory information notice (RIN) data and generally accept the capex reported in those RINs in rolling forward the RAB.[148] However, there may be instances where adjustments are required to the annual reporting RIN data[149]

- subtracting depreciation from the RAB for the relevant year, calculated in accordance with the distribution determination for the distributor.[150] Depreciation based on forecast or actual capex can be used to roll forward the RAB.[151] Our default approach is to use depreciation based on forecast capex for rolling forward the distributor's RAB over the regulatory control period.[152]
- subtracting any gross proceeds for asset disposals for the relevant year from capex to be added to the RAB.[153] We check these amounts against audited annual reporting RIN data.

These annual adjustments give the closing RAB for any particular year, which then becomes the opening RAB for the following year. Through this process the RFM rolls forward the RAB to the end of the current regulatory control period. The PTRM, which is used to calculate the ARR for the next regulatory control period, generally adopts the same RAB roll forward approach as the RFM. However, in the PTRM, the annual adjustments to the RAB are based on forecasts, rather than actual amounts.[154]

A.2.2 Depreciation approach in the RAB roll forward

The opening RAB for the subsequent regulatory control period can be determined using depreciation based either on forecast or actual capex incurred during the next regulatory control period.[155] To roll forward the RAB using depreciation based on forecast capex, we would use the forecast depreciation contained in the PTRM for the next regulatory control period, adjusted for actual inflation. If the approach to roll forward the RAB using depreciation based on actual capex was adopted, we would recalculate the depreciation based on actual capex incurred during the next regulatory control period.

Our decision on whether to use actual or forecast depreciation must be consistent with the capex incentive objective.[156] This objective is to ensure that increases to the RAB through

147 NER, cl. S6.2.2A(a1). The 2-year lag ensures that actual capex (instead of estimated capex) is available when the review of past capex commences.

148 We will update any estimated capex with actual capex at the time of the next distribution determination.

149 For example, we make adjustment for movements in capitalised provisions if the actual capex amounts reported in the RIN include capitalised provisions.

150 NER, cl. S6.2.1(e)(5).

151 NER, cl. 6.12.1(18).

152 The use of forecast depreciation must be consistent with the depreciation approach established in the distributor's distribution determination.

153 NER, cl. S6.2.1(e)(6).

154 NER, cl. S6.2.3.

155 NER, cl. S6.2.2B.

156 NER, cl. S6.2.2B(b).

capex only occur where that capex reasonably reflects the capex criteria.[157] In deciding between actual and forecast depreciation, we have regard to:[158]

- the incentives the service provider has to undertake efficient capex
- substitution possibilities between assets with different lives and the relative benefits of each
- the extent of overspending and inefficient overspending relative to the allowed forecast
- the capex incentive guideline
- the capex factors.

A.2.3 Interrelationships

The RAB is an input into the determination of the return on capital and depreciation (return of capital) building block amounts.[159] Factors that influence the RAB will therefore flow through to these building block components and the annual revenue requirement. Other things being equal, a higher RAB increases both the return on capital and depreciation amounts.

The RAB is determined by various factors, including:

- the opening RAB (meaning the value of existing assets at the beginning of the regulatory control period)
- net capex[160]
- depreciation
- indexation adjustment – so the RAB is presented in nominal terms, consistent with the rate of return.

The opening RAB at the start of a regulatory control period depends on the value of existing assets and will depend on actual net capex, actual inflation outcomes and depreciation in the past.

The RAB when projected to the end of the period increases due to both forecast new capex and the indexation adjustment. The size of the indexation adjustment depends on expected inflation (which also affects the nominal rate of return or WACC) and the size of the RAB at the start of each regulatory year.

Depreciation reduces the RAB. The depreciation amount depends on the size of the opening RAB, the forecast net capex and depreciation schedules applied to the assets. By convention, the indexation adjustment is also offset against depreciation to prevent double counting of inflation in the RAB and WACC, which are both presented in nominal terms. This

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157 NER, cl. 6.4A(a).

158 NER, cl. S6.2.2B(b) and (c).

159 The size of the RAB also impacts the benchmark debt raising cost allowance. However, this amount is usually relatively small and therefore not a significant determinant of revenues overall.

160 Net capex is gross capex less disposals and capital contributions. The rate of return or WACC also influences the size of the capex. This is because the capex is not depreciated in the year it is first incurred but added to the RAB at the end of the year. Instead, the capex amount is escalated by half-year WACC to arrive at an end of year value. It then begins depreciating the following year.

reduces the regulatory depreciation building block that feeds into the annual revenue requirement.

We maintain the RAB in real terms by indexing for inflation.[161] A nominal rate of return (WACC) is multiplied by the opening RAB to produce the return on capital building block.[162] To prevent the double counting of inflation through the nominal WACC and indexed RAB,[163] the regulatory depreciation building block has an offsetting reduction for indexation of the RAB.[164] Indexation of the RAB and the offsetting adjustment made to depreciation results in smoother revenue recovery profile over the life of an asset than if the RAB was un-indexed. If the RAB was un-indexed, there would be no need for an offsetting adjustment to the depreciation calculation of total revenue. This alternative approach provides for overall revenues being higher early in the asset's life (as a result of more depreciation being returned to the distributor) and lower in the future—producing a steeper downward sloping profile of total revenue.[165] The implications of an un-indexed RAB are discussed further in appendix A.3.

A 10% increase in the opening RAB at the start of the regulatory control period generally causes unsmoothed revenues ($ nominal) to increase by about 4% to 8%. However, the impact on revenues of the annual change in RAB depends on the source of the RAB change, as some drivers affect more than one building block cost.[166]

A.3 Regulatory depreciation – assessment approach

We must determine the regulatory depreciation amount as part of determining a distributor's ARR.[167] The calculation of depreciation in each year is governed by the value of assets included in the RAB at the beginning of the regulatory year, and by the depreciation schedules.[168]

A.3.1 Calculating depreciation in the PTRM

Our standard approach to calculating depreciation is to employ the straight-line method set out in the PTRM. Regulatory practice has been to assign a standard asset life to each category of assets that represents the economic or technical life of the asset or asset

161 NER, cll. 6.3.2(a)(2), 6.5.1(e)(3).

162 NER, cl. 6.5.2; AER, Rate of return instrument, cll. 1, 3, 36(c), February 2023.

163 NER, cl. 6.4.3(b)(1)(ii).

164 If the asset lives are extremely long, such that the RAB depreciation rate is lower than the inflation rate, then negative regulatory depreciation can emerge. The indexation adjustment is greater than the RAB depreciation in such circumstances. Please also refer to Appendix A.3.3 for further explanation of the offsetting adjustment to the depreciation.

165 A change of approach from an indexed RAB to an un-indexed RAB would result in an initial step change increase in revenues to preserve net present value (NPV) neutrality.

166 If capex causes the RAB increase, return on capital, depreciation, and debt raising costs all increase too. If a reduction in depreciation causes the RAB increase, revenue could increase or decrease. In this case, the higher return on capital is offset (perhaps more than offset) by the reduction in depreciation allowance. Inflation naturally increases the RAB in nominal terms.

167 NER, cll. 6.4.3(a)(3) and (b)(3).

168 NER, cl. 6.5.5(a).

class.[169] We must consider whether the proposed depreciation schedules conform to the following key requirements:

- the schedules must depreciate using a profile that reflects the nature of the assets or category of assets over the economic life of that asset or category of assets[170]
- the sum of the real value of the depreciation that is attributable to any asset or category of assets must be equivalent to the value at which that asset or category of assets was first included in the RAB for the relevant distribution system[171]
- the economic life of the assets, and the depreciation methods and rates underpinning the calculation of depreciation for a regulatory control period must be consistent with those determined for the same assets on a prospective basis in the distribution determination for that period.[172]

To the extent that a distributor's regulatory proposal does not conform with the above requirements, we must determine the depreciation schedules for calculating the depreciation for each regulatory year.[173]

A.3.2 Assessing the depreciation inputs to the PTRM

The regulatory depreciation amount is an output of the PTRM. We therefore assess the distributor's proposed regulatory depreciation amount by analysing the proposed inputs to the PTRM for calculating that amount. The key inputs include:

- the opening RAB at the start of the regulatory control period
- the forecast net capex in the next regulatory control period[174]
- the expected inflation rate for the next regulatory control period
- the standard asset life for each asset class—used for calculating the depreciation of new assets associated with forecast net capex in the next regulatory control period
- the depreciation of existing assets in the opening RAB at the start of the regulatory control period—calculated in a separate year-by-year tracking depreciation module.

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169 This is the standard practice for the AER, as well as other jurisdictional regulators. See for example,
IPART, *Cost building block model template – RAB & tax inputs – Table 2*, February 2023.
ERAWA, *Final decision on proposed revisions to the access arrangement for the Western Power Network 2022/23 – 2026/27 – Target Revenue Model,* March 2023.
AER, *Final decision: Electricity distribution network service providers – Post-tax revenue model handbook*, April 2021, p. 15.
AER, *Draft decision: AusNet Services transmission determination 2017-18 to 2021-22, Attachment 5 – Regulatory depreciation*, July 2016, p. 37.

170 NER, cl. 6.5.5(b)(1).

171 NER, cl. 6.5.5(b)(2).

172 NER, cl. 6.5.5(b)(3).

173 NER, cl. 6.5.5(a)(2)(ii).

174 Capex enters the RAB net of forecast disposals and capital contributions. It includes equity raising costs (where relevant) and is adjusted for half-year WACC to account for the timing assumptions in the PTRM. Our draft decision on the RAB (section 1.2) also reflects our updates to the WACC for the 2026–31 period.

Our draft decision on the distributor's regulatory depreciation amount reflects our determinations on the opening RAB, forecast capex and expected inflation rate (the first three building block components in the above list).[175] Our determinations on these components of the distributor's proposal are discussed in section 1.2, Attachment 2 and Overview section 2.2, respectively.

In this attachment, we assess the distributor's proposed standard asset lives against:

- the approved standard asset lives in the distribution determination for the current regulatory control period
- the standard asset lives of comparable asset classes approved in our recent distribution determinations for other service providers
- the appropriate economic lives of the assets.

Our regulatory models (RFM and PTRM) provide for 2 approaches for calculating the straight-line depreciation of existing assets:

- The 'weighted average remaining lives' (WARL) approach: This approach calculates the remaining asset life for an asset class by weighting together its remaining asset life at the beginning of the regulatory control period with the new capex added to the asset class during that period. The residual asset values are used as weights to calculate the remaining asset life at the end of that period. The WARL for the asset classes are calculated in our RFM and are inputs to the PTRM. We consider this approach meets the requirements for determining depreciation under the NER.
- The 'year-by-year tracking' approach: Under this approach, the capex (in addition to grouping assets by type via asset classes) for each year of the regulatory control period is depreciated separately and tracked on a year-by-year basis over the assigned standard life for the asset class. This approach does not require the assessment of the remaining asset life at each five-yearly distribution determination. We consider this approach also meets the requirements for determining depreciation under the NER. Our depreciation tracking module in the RFM conducts the detailed calculations required under this approach. The output of this module is then recorded in the PTRM.

A.3.3 Interrelationships

The regulatory depreciation amount is a building block component of the annual revenue requirement.[176] Higher (or quicker) depreciation leads to higher revenues over the regulatory control period. It also causes the RAB to reduce more quickly (excluding the impact of further capex). This reduces the return on capital amount, although this impact is usually smaller than the increased depreciation amount in the short to medium term.[177]

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175 Our final decision will update the opening RAB for revised estimates of actual capex and inflation.

176 The PTRM distinguishes between straight-line depreciation and regulatory depreciation, where regulatory depreciation is the straight-line depreciation less the indexation adjustment.

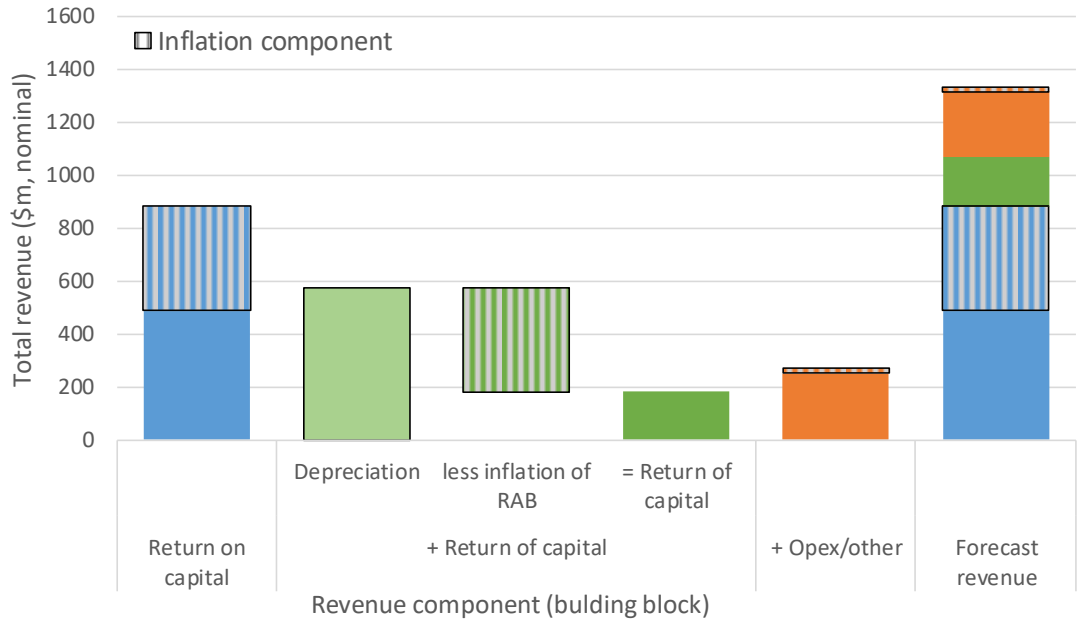
177 This is generally the case because the reduction in the RAB amount feeds into the higher depreciation building block, whereas the reduced return on capital building block is proportionate to the lower RAB multiplied by the WACC.

Ultimately, however, a distributor can only recover the capex that it incurs on assets once. The depreciation amount reflects how quickly the RAB is being recovered, and it is based on the asset lives used in the depreciation calculation. It also depends on the level of the opening RAB and the forecast capex. Any increase in these factors also increases the depreciation amount.

The RAB has to be maintained in real terms, meaning the RAB must be indexed for expected inflation.[178] The return on capital building block has to be calculated using a nominal rate of return applied to the opening RAB.[179] As noted in section 1.1, the total ARR is calculated by adding up the return on capital, depreciation, operating expenditure (opex), tax and revenue adjustments building blocks. Because inflation on the RAB is accounted for in both the return on capital—based on a nominal rate—and the depreciation calculations—based on an indexed RAB—an adjustment must be made to the revenue requirement to prevent compensating twice for inflation.

To avoid this double compensation, we make an adjustment by subtracting the annual indexation gain on the RAB from the calculation of total revenue. Our standard approach is to subtract the indexation of the opening RAB—the opening RAB multiplied by the expected inflation for the year—from the RAB depreciation. The net result of this calculation is referred to as regulatory depreciation.[180] Regulatory depreciation is the amount used in the building block calculation of total revenue to ensure that the revenue equation is consistent with the use of a RAB, which is indexed for inflation annually. Figure 1.8 shows where the inflation components are included in the building block costs.

Figure 1.8 Inflation components in revenue building block – example



178 NER, cll. 6.3.2(a)(2), 6.4.3(b)(1) and S6.2.3(c)(4).

179 AER, Rate of return instrument, cll. 1, 3, 36(c), February 2023.

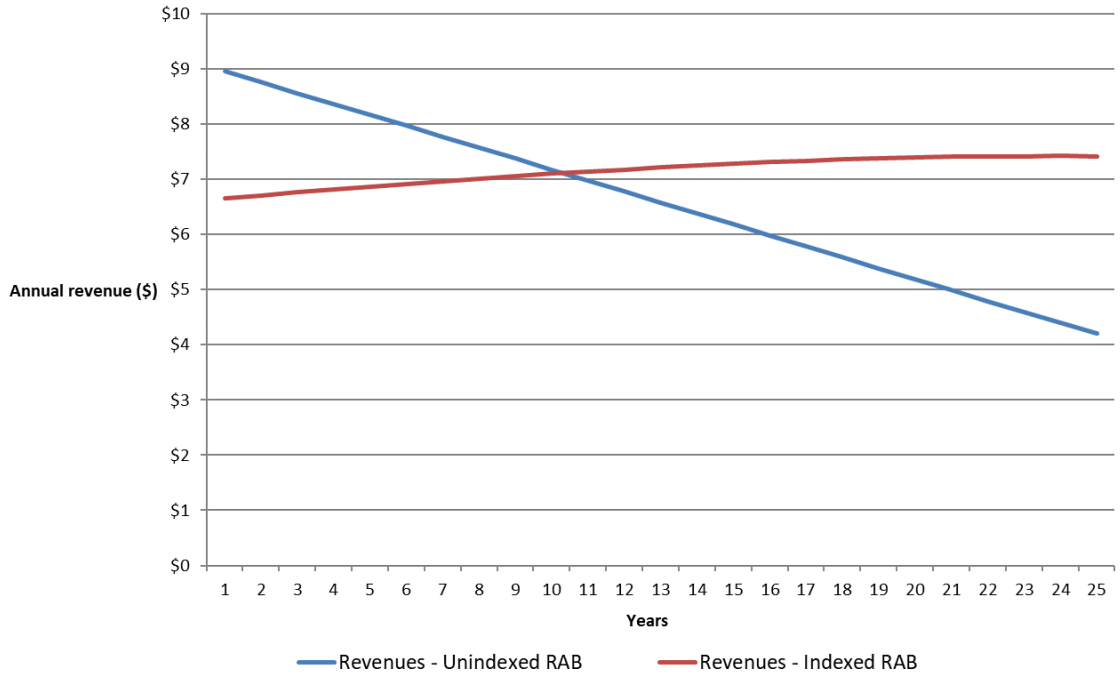
180 If the asset lives are extremely long, such that the RAB depreciation rate is lower than the inflation rate, then negative regulatory depreciation can emerge. The indexation adjustment is greater than the straight-line depreciation in such circumstances.

Source: AER analysis.

This approach produces the same total revenue requirement and RAB as if a real rate of return had been used in combination with an indexed RAB. Under an alternative approach where a nominal rate of return was used in combination with an un-indexed (historical cost) RAB, no adjustment to the depreciation calculation of total revenue would be required. This alternative approach produces a different time path of total revenue compared to our standard approach. In particular, overall revenues would be higher early in the asset's life (as a result of more depreciation being returned to the distributor) and lower in the future—producing a steeper downward sloping profile of total revenue.[181] Under both approaches, the total revenues being recovered are in present value neutral terms—that is, returning the initial cost of the RAB.

Figure 1.9 shows the recovery of revenue under both approaches using a simplified example.[182] Indexation of the RAB and the offsetting adjustment made to depreciation results in a smoother revenue recovery profile over the life of an asset than if the RAB was un-indexed. The indexation of the RAB also reduces prices shocks when the asset is replaced at the end of its life.[183]

Figure 1.9 Revenue path example – indexed vs un-indexed RAB ($ nominal)



181 A change of approach from an indexed RAB to an un-indexed RAB would result in an initial step change increase in revenues to preserve net present value (NPV) neutrality.

182 The example is based on the initial cost of an asset of $100, a standard economic life of 25 years, a real WACC of 2.50%, expected inflation of 2.40% and nominal WACC of 4.96%. Other building block components such as opex, tax and capex are ignored for simplicity as they would affect both approaches equally.

183 In year 26, the revenues in the example for the un-indexed approach would jump from about $4 to $9, assuming the asset is replaced by an asset of roughly similar replacement cost as the initial asset. In contrast, in the same circumstances, the indexed approach would see revenues stay at roughly $7.

Source: AER analysis.

Figure 1.7 shows the relative size of the inflation and straight-line depreciation, and their impact on the RAB. A 10% increase in the straight-line depreciation generally causes unsmoothed revenues ($ nominal) to increase by about 3% to 5%.

A.4 Corporate income tax – assessment approach

We make an estimate of the taxable income for each regulatory year as part of our determination of the ARR for the distributor's regulatory control period.[184] Our estimate is the taxable income that a benchmark efficient entity would earn for providing SCS if it operated the distributor's network business, which is determined in accordance with the PTRM.

A.4.1 Calculating estimated cost of corporate income tax in the PTRM

Our standard approach for calculating a distributor's estimated cost of corporate income tax is set out in our PTRM[185] and involves the following steps:[186]

1. We estimate the annual assessable income (taxable revenue) that would be earned by a benchmark efficient entity operating the distributor's business. This is the approved forecast revenues for the distributor that we determined using the building block approach.[187] It includes capital contributions where these are subject to taxation.
2. We then estimate the benchmark tax expenses such as opex, interest expense and tax depreciation in the following ways:
   - operating expense is set equal to the opex building block[188]
   - interest expense is a function of the size of the RAB, the benchmark gearing assumption (60%) and the regulated cost of debt
   - tax depreciation expense is calculated using a separate value for the TAB, and standard and/or remaining tax asset lives for taxation purposes. Previously, the PTRM applied the straight-line method for calculating tax depreciation for all assets. Consistent with the findings of the 2018 tax review,[189] the PTRM applies the straight-line tax depreciation method for existing assets and the diminishing value tax depreciation method[190] for all assets acquired after implementation of the tax review findings except for in-house software, buildings (capital works) and equity raising costs. The expenditure for these assets is to be depreciated using the straight-line method under the tax law. The PTRM also accounts for the value of certain forecast

184 Clause 6.5.3 of the NER sets out the formula we must use to estimate corporate income tax.

185 AER, *Electricity distribution network service providers: Post-tax revenue model (version 5)*, April 2021.

186 The PTRM must specify the manner in which the estimated cost of corporate income tax is to be calculated: NER, cl. 6.4.2(b)(4).

187 The total revenue for tax purposes is the sum of the building blocks including return on capital, return of capital, operating expenditure and cost of corporate taxation, and any capital contributions. It may also include other revenue adjustments, but the assessment of whether they should give rise to a tax payable will occur on a case-by-case basis.

188 Our assessment approach for the opex building block is discussed in Attachment 3 of the draft decision.

189 AER, *Final report, Review of regulatory tax approach*, December 2018.

190 For more explanation of how we calculate depreciation using the diminishing value method, please see: AER, *Distribution PTRM handbook*, April 2021, pp. 22–23.

capex to be immediately expensed when estimating the benchmark tax expense. The value of immediately expensed capex is deducted from the net capex being depreciated for tax purposes for the year in which it is forecast to be incurred.[191] The immediately expensed amount is then included in the total tax depreciation amount for the relevant year.

There may be other revenue adjustments, but the assessment of whether they should give rise to a tax payable occurs on a case-by-case basis.

3. We estimate the annual taxable income that would be earned by a benchmark efficient entity operating the distributor's business by subtracting the benchmark estimates of tax expenses (step 2) from the approved forecast revenues for the distributor (step 1).
4. We apply the statutory income tax rate to the estimated annual taxable income (after adjustment for any tax loss carried forward) to arrive at a notional amount of tax payable.
5. We deduct the expected value for the utilisation of imputation credits (gamma) by investors from the notional amount of tax payable. The tax payable net of the expected value of imputation credits represents the estimated cost of corporate income tax and is included as a separate building block in determining the distributor's ARR.

A.4.2 Assessing the tax inputs to the PTRM

The estimated cost of corporate income tax is an output of the PTRM. We therefore assess the distributor's proposed cost of corporate income tax by analysing the proposed inputs to the PTRM for calculating that cost. Our assessment approach for each of the tax inputs required in the PTRM are discussed in turn below:

- **The opening TAB value as at the commencement of the next regulatory control period**: We consider that the roll forward of the opening TAB should be based on the approved opening TAB at the start of the current regulatory control period and the distributor's actual/estimated capex incurred during the current regulatory period, and the actual capex incurred in the final year of the previous regulatory control period.[192] The roll forward of the opening TAB for the current regulatory period is calculated in our RFM, which relies on the depreciation module.

  The opening TAB value at the start of the next regulatory control period is used to estimate forecast tax depreciation for that period, including new assets to be added to the TAB over the next regulatory control period. We will continue to apply the straight-line method of tax depreciation for existing assets in the opening TAB prior to the implementation of the 2018 tax review findings. However, for all assets added to the TAB after this implementation (with some exceptions discussed further below), we will apply the diminishing value method of tax depreciation.

- **The form of customer contributions:** On 21 October 2020, the Full Federal Court of Australia published a judgment dealing with the tax treatment of capital contributions.[193] The determination:

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191 That is, the net capex to be added to the TAB for tax depreciation purposes is the amount of gross capex, less disposals, less the immediately deductible capex.

192 The tax depreciation is therefore recalculated based on actual capex. The same tax depreciation approach of using actual capex applies to the roll forward of the TAB at the next distribution determination.

193 Federal Court of Australia, *Victoria Power Networks Pty Ltd v Commissioner of Taxation* [2020] FCAFC 169, 21 October 2020.

- Confirmed an earlier Court ruling that cash contributions were ordinary income and should be treated as assessable income for tax purposes.
- Overturned an earlier Court ruling and determined that while a gifted asset was a 'non-cash business benefit' there was effectively nil income for tax purposes.

We consider the Court's ruling on gifted assets requires us to exclude the cost of construction of these assets from the gross capex and capital contributions inputs to the PTRM. Consequently, this excludes gifted assets from the calculation of the estimated cost of corporate income tax building block. Capital contributions in the form of cash continue to be included in the calculation of the estimated cost of corporate income tax building block.

- **The standard tax asset life for each asset class:** Our assessment of a distributor's proposed standard tax asset life is generally guided by the effective life of depreciating assets determined by the Commissioner of Taxation. We consider that the standard tax asset lives for the majority of the distributor's asset classes should be consistent with the ATO Taxation Ruling 2022/1 regarding the effective life of depreciating assets where possible.[194]

  As discussed above, the PTRM applies the diminishing value tax depreciation method for all new assets except for in-house software, buildings (capital works) and equity raising costs. It provides designated asset classes for these assets to be depreciated using the straight-line method for tax purposes.[195] We note that the tax effective lives for in-house software, buildings (capital works) and equity raising costs are not covered under the ATO Taxation Ruling 2022/1. Therefore, our assessment of the standard tax asset lives for these asset classes are guided by the *Income Tax Assessment Act 1997* (ITAA). Specifically, we consider that the standard tax asset life should be:

  - 40 years for buildings. This is consistent with the number of years required to completely depreciate capital works assets such as buildings for tax purposes when applying sections 43-15, 43-140 and 43-210 of the ITAA.
  - 5 years for in-house software. This is consistent with subsection 40-95(7) of the ITAA.
  - 5 years for equity raising costs. This is consistent with section 40-880 of the ITAA.
- **The income tax rate**: The statutory income tax rate is 30% per annum for businesses of the size we regulate.
- **The value of gamma**: The gamma input is set out in the 2022 *Rate of Return Instrument*, which requires us to use a gamma value of 0.57.[196] This is discussed further in Overview section 2.2.
- **The size and treatment of any tax losses as at the commencement of the next regulatory control period:** Where a business has tax losses under our benchmark approach, we require the provision of this value to determine the appropriate estimated

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194 ATO, *Taxation Ruling TR2022/1 – Income tax: effective life of depreciating assets (applicable from 1 July 2022)*, June 2022.

195 Our assessment approach on new assets to be exempted from the diminishing value method is discussed in detail below.

196 AER, *Rate of Return Instrument*, February 2023, p. 9.

taxable income for a regulatory control period. If there is an amount of tax losses accumulated, the forecast taxable income for the regulatory control period will be reduced by this amount.

- **Forecast immediately expensed capex:** The PTRM requires a forecast for immediately deductible capex to be provided for each regulatory year of the next regulatory control period. Our assessment of forecast immediately expensed capex will be guided by the distributor's actual immediately expensed capex from the previous regulatory control period.[197] We will collect actual data relating to this expenditure in our annual reporting RINs to further inform our decision on the amount of forecast immediately expensed capex in future regulatory determinations. Benchmarking may also be considered going forward.[198]
- **Diminishing value multiplier:** The PTRM applies the diminishing value method of tax depreciation and provides an input section for the 'diminishing value multiplier' to be recorded for each year of the regulatory control period. We note that currently the diminishing value multiplier is set at 200% by the ATO.
- **New assets to be exempted from the diminishing value method:** The PTRM applies the diminishing value method for tax depreciation purposes to all new depreciable assets except for certain assets. It provides for asset classes 47 to 50 to be depreciated using the straight-line method for tax purposes instead of the diminishing value method. These asset classes are to contain new assets associated with in-house software, buildings (capital works) and equity raising costs.

  We consider that the benchmark equity raising costs should not be depreciated using the diminishing value method. We note that section 40-880 of the ITAA and the ATO's taxation ruling 2011/6[199] require that businesses claim deductions on equity raising costs in equal proportions over a 5-year period. Therefore, in the PTRM, we apply the straight-line method for calculating the tax depreciation for equity raising costs, consistent with the ITAA and ATO's requirements.[200] Further, the distributor may propose capex associated with buildings and in-house software be exempted from the diminishing value method of tax depreciation in the PTRM if the proposal satisfies the following requirements:

  – Buildings: We consider that capex for buildings may be exempted from the diminishing value method in the PTRM, consistent with sections 43-15, 43-140 and 43-210 of the ITAA. However, such capex must be consistent with the definition of a capital work under section 43-20 of the ITAA and in ATO taxation ruling 97/25.[201] We note that this includes new buildings and structural improvements to existing buildings.[202] However, capex on separate assets within a building such as air-

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197 In the tax review final report, we labelled our approach to determining the amount of capex that is to be immediately expensed as an 'actuals informed approach'. AER, *Final report, Review of regulatory tax approach*, December 2018, p. 66.

198 AER, *Final report, Review of regulatory tax approach*, December 2018, pp. 66–67.

199 ATO, *Taxation Ruling 2011/6*, July 2016.

200 The benchmark cost for equity raising costs is determined within the PTRM.

201 ATO, *Taxation Ruling 97/25*, July 2017.

202 ITAA, section 43-20.

conditioning units, transformers and converters are not consistent with the definition of a capital work, and therefore are required to be depreciated using the diminishing value method in the PTRM.

- In-house software: We consider that capex for in-house software may be exempted from the diminishing value method in the PTRM, consistent with section 40-72 of the ITAA. However, such capex must be consistent with the definition of in-house software under section 995-1 of the ITAA and in ATO taxation ruling 2016/3.[203] We note that this includes computer software, or the right to use computer software that the distributor acquires, develops or has someone else develop for the distributor's business use.[204] However, capex associated with other IT assets such as computer hardware is not consistent with the definition of in-house software, and is therefore required to be depreciated using the diminishing value method in the PTRM.

A.4.3 Interrelationships

The cost of corporate tax income building block feeds directly into the annual revenue requirement. This amount is determined by 5 factors:

- pre-tax revenues
- tax expense (including tax depreciation)
- the corporate tax rate
- any tax losses carried forward
- gamma — the expected proportion of company tax that is returned to investors through the utilisation of imputation credits–which is offset against the corporate income tax payable.

Of these factors, the corporate tax rate is set by the Australian Government. The higher the tax rate, the higher the required tax payable.

The pre-tax revenues depend on all the building block components. Any factor that affects revenue will therefore affect pre-tax revenues. Higher pre-tax revenues can increase the tax payable.[205] Depending on the source of the revenue increase, the tax increase may be equal to or less than proportional to the company tax rate.[206]

The tax expenses (or deductions) depend on various building block components and their size. Some components give rise to tax expenses, such as opex, interest payments and tax depreciation of assets. However, others do not, such as increases in return on equity. Higher

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203 ATO, *Taxation Ruling 2016/3*, October 2018.

204 ITAA, section 995-1.

205 In fact, there is an iterative relationship between tax and revenues. That is, revenues lead to tax, being applied, which increases revenues and leads to slightly more tax and so on. The PTRM is therefore set up to run an iterative process until the revenue and the cost of corporate income tax become stable.

206 For example, although increased opex adds to revenue requirement, these expenses are also offset against the revenues as deductions in determining tax, so there is no net impact in this case. A higher return on equity, in contrast, gives rise to no offsetting tax expenses and therefore increases the tax payable in proportion to the company tax rate.

tax expenses offset revenues as deductions in the tax calculation and therefore reduce the cost of corporate income tax (all things being equal). Tax expenses include:

- Interest on debt – because interest is a tax offset. The size of this offset depends on the ratio of debt to equity and therefore the proportion of the RAB funded through debt. It also depends on the allowed return on debt and the size of the RAB.
- General expenses – these expenses generally will match the opex forecast including any revenue adjustments, but the assessment of whether they should be treated as a tax expense occurs on a case-by-case basis.
- Tax depreciation – a separate TAB is maintained for the distributor reflecting tax rules. This TAB is affected by many of the same factors as the RAB, such as capex, although unlike the RAB value it is maintained at its historical cost with no indexation. The TAB is also affected by the depreciation rate/method and asset lives assigned for tax depreciation purposes.

A business that has tax expenses which are greater than its taxable revenue in a period would not be subject to pay tax and instead will generate a tax loss. A tax loss can be carried forward to offset against tax payable in the future.

For a business that does not have tax losses, a 10% increase to the cost of corporate income tax amount generally causes unsmoothed revenues ($ nominal) to increase by up to 1%.

Shortened forms

Term	Definition
ADMS	advanced distribution management system
AER	Australian Energy Regulator
ARR	annual revenue requirement
ATO	Australian Taxation Office
capex	capital expenditure
CCP32	Consumer Challenge Panel, sub-panel 32
CESS	capital expenditure sharing scheme
CPI	consumer price index
DMIAM	demand management innovation allowance mechanism
EBSS	efficiency benefit sharing scheme
ESCV	Essential Services Commission of Victoria
F&A	Framework and approach
gamma	imputation credits
ICT	Information and communication technology
ITAA	Income Tax Assessment Act 1997
NER	National Electricity Rules
NPV	net present value
opex	operating expenditure
PTRM	post-tax revenue model
RAB	regulatory asset base
RIN	regulatory information notice
RFM	roll forward model
SCS	standard control services
TAB	tax asset base
WACC	weighted average cost of capital (rate of return)
WARL	weighted average remaining lives