

2024-25 AER Annual Order – CitiPower Supporting Information Draft Response

Item	AER Requirements	Response	
4.1 Requirement to provide supporting information under this Order			
4.1.1	CitiPower must prepare and provide the AER with the information set out in sections 4, 5 and 6 of this Order.	Item	Filename
		Consolidated data workbook - public	CitiPower - Annual Order - 2024-25 - Consolidated data workbook - PUBLIC
		Consolidated data workbook - confidential	CitiPower - Annual Order - 2024-25 - Consolidated data workbook - CONFIDENTIAL
		5.4 Optional MD & utilisation - public	CitiPower - Annual Order - 2024-25 - 5.4 Optional MD & utilisation - PUBLIC
		CSIS template	CitiPower - Annual Order - 2024-25 - CSIS - PUBLIC
		Basis of Preparation	CitiPower - Annual Order - 2024-25 - Basis of Preparation
		Confidentiality template	CitiPower - Annual Order - 2024-25 - Confidentiality Template
		Supporting information document (with related attachments referred to below)	CitiPower - Annual Order - 2024-25 - Supporting Information
		Statutory declaration	CitiPower - Annual Order - 2024-25 - Statutory Declaration
		Cover letter	CitiPower - Annual Order - 2024-25 - Cover Letter

Item	AER Requirements	Response
4.1.2	<p>CitiPower must provide the following information to assist the AER in identifying the information:</p> <p>(a) a table that identifies each response to this section 4 and where it is provided in the annual information submission;</p> <p>(b) a table that references each file (workbook, document or other) provided, where each file listed in the table must be given a name in the form: [Electricity distributor name] – Annual Order – [reporting period] – [title] – [public/confidential] where: (i) [Title] provides a meaningful description of the content of document, with limited reliance on acronyms or cross references, for example “Appendix 1A” is not meaningful, but “Appendix 1A – Cost allocation method” is; (ii) [Public/confidential] identifies if the file in its entirety can be published (public); or if it contains any information that is the subject of a claim for confidentiality in accordance with this Order (confidential)</p>	<p>(a) The contents set out in this table identify responses to Section 4 and references to the annual information submission where relevant</p> <p>(b) Please see above</p> <p>Confidential files have been identified in CitiPower - Annual Order - 2024-25 - Confidentiality Template</p>
4.2 Policies and procedures		
4.2.1	<p>CitiPower must provide its policies and procedures, encompassing:</p> <p>(a) regulatory accounting principles and policies,</p> <p>(b) capitalisation policy,</p> <p>(c) policy/procedures for the allocation of overheads, in accordance with the approved cost allocation method.</p>	<p>Attachment 1 - CitiPower - Cost Allocation Method Attachment 2 - CitiPower - Regulatory Accounting Principles and Policies</p>
4.2.2	<p>CitiPower must identify any changes to the policies and procedures listed at 4.2.1 that have occurred in the reporting period, and describe:</p> <p>(a) the reason for the change</p> <p>(b) the impact of the change on the information being reported.</p>	<p>No changes</p>
4.2.3	<p>If the policies and procedures required at 4.2.1 have previously been submitted to the AER and have not been amended since that submission the electricity distributor must report the previous submission date and does not have to provide the policies and procedures again.</p>	<p>Attachment 1 - CitiPower - Cost Allocation Method Attachment 2 - CitiPower - Regulatory Accounting Principles and Policies</p>

Item	AER Requirements	Response
		Submitted with the FY2023/24 RINs
4.3 Regulatory adjustments		
4.3.1	For regulatory adjustments recorded in the data workbooks (Workbook 06 – Operating expenditure, Workbook 09 – Revenue and financial statements) the electricity distributor must provide information that reconciles and explains all adjustments between the audited statutory accounts and the Distribution business, set out in a regulatory adjustment reconciliation report.	Attachment 3 - CitiPower - Regulatory adjustments
4.3.2	For each regulatory adjustment recorded in the data workbooks (Workbook 06 – Operating expenditure, Workbook 09 – Revenue and financial statements) the regulatory adjustment reconciliation report must include: (a) a detailed explanation for the underlying reason for the regulatory adjustment (b) methodology and assumptions used to quantify the regulatory adjustment (c) details of relevant debits and credits associated with the regulatory adjustment.	Attachment 3 - CitiPower - Regulatory adjustments
4.3.3	If an electricity distributor has previously provided the AER with a regulatory adjustments journal in response to annual reporting obligations in place for the 2022-23 reporting year, then the regulatory adjustment reconciliation report must continue to be in the form of a regulatory adjustments journal. NOTE: an example of a regulatory adjustments journal, is that required under the AER Transmission Information Guideline (2015).	Attachment 3 - CitiPower - Regulatory adjustments
4.4 Discretionary row descriptors		
4.4.1	CitiPower should keep discretionary row descriptors (inputs) used to meet the information requirements in the data workbooks at Appendix A the same in each reporting period.	Attachment 6 - CitiPower - Row Descriptors

Item	AER Requirements	Response
4.4.2	<p>If CitiPower has varied the row descriptors (input) compared to those used in the previous reporting period or regulatory year, CitiPower must provide:</p> <ul style="list-style-type: none"> (a) an explanation of the relationship between the current row descriptors, and those used previously (b) an explanation of why the change was made (c) supporting material (or references to supporting material) driving the change (including for example policies, guidelines, or accounting standards). 	<p>Discretionary row descriptors in 8.4 Opex per the RIO workbook have changed relative to the prior year RINs. This change was due to the transition to the new RIO workbooks and accompanying requirements. The change has also ensures streamlined reporting, consistency across all templates and aids users in reconciling various categories of expenditure.</p> <p>Please refer to the attached Attachment 6 - CitiPower - Row Descriptors for a reconciliation of the relationship between the prior year and current.</p>
4.5 Allocation of revenues and expenditures to distribution services		
4.5.1	<p>For each item of revenue or expenditure that is not directly attributable and is reported on a causal allocation basis to distribution services provide:</p> <ul style="list-style-type: none"> (a) a description of the causal basis of allocation (b) the numeric quantity of the allocator (c) an explanation of why the allocator was selected 	Attachment 4 - CitiPower - Income Statement Allocations
4.5.2	<p>For each item of revenue or expenditure that is not directly attributable and is reported on a non-causal allocation basis to distribution services provide:</p> <ul style="list-style-type: none"> (a) a description of the non-causal basis of allocation (b) the numeric quantity of the allocator (c) an explanation of why the allocator was preferred over other possible allocators (d) an explanation of why no causal basis of allocation could be established (e) documents showing any approval previously granted by the AER to use the allocator. 	Attachment 4 - CitiPower - Income Statement Allocations

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4.6 Allocation of revenues and expenditures to service segments																									
Note: Service segment refers to direct control services (either standard control services or alternative control services), negotiated distribution services, unregulated distribution services and non-distribution services.																									
4.6.1	For each item of revenue or expenditure reported on a causal allocation basis from distribution services to a service segment provide: (a) a description of the causal basis of allocation (b) the numeric quantity of the allocator (c) an explanation of why the allocator was selected	Attachment 4 - CitiPower - Income Statement Allocations																							
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4.7 Material differences																									
4.7.1	Identify each difference (where the difference is equal to or greater than ± 10 per cent) between the target performance measure specified in the service target performance incentive scheme and actual performance reported in the data workbooks.	<p>We are rewarded or penalised under the service target performance incentive scheme (STPIS) which covers our reliability performance and telephone response.</p> <p>Actual STPIS outcomes versus the AER targets are set out in the table below:</p> <table border="1" data-bbox="1238 1217 2011 1439"> <thead> <tr> <th colspan="5" data-bbox="1238 1217 2011 1257" style="text-align: center;">CitiPower – 2024-25</th> </tr> <tr> <th colspan="2" data-bbox="1238 1257 1597 1329" style="text-align: center;">Measure</th> <th data-bbox="1597 1257 1720 1329" style="text-align: center;">AER Target</th> <th data-bbox="1720 1257 1865 1329" style="text-align: center;">Actual</th> <th data-bbox="1865 1257 2011 1329" style="text-align: center;">Variance (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1238 1329 1350 1369" rowspan="3" style="text-align: center;">CBD</td> <td data-bbox="1350 1329 1597 1369" style="text-align: center;">USAIDI</td> <td data-bbox="1597 1329 1720 1369" style="text-align: center;">8.855</td> <td data-bbox="1720 1329 1865 1369" style="text-align: center;">5.623</td> <td data-bbox="1865 1329 2011 1369" style="text-align: center;">-36%</td> </tr> <tr> <td data-bbox="1350 1369 1597 1409" style="text-align: center;">USAIFI</td> <td data-bbox="1597 1369 1720 1409" style="text-align: center;">0.108</td> <td data-bbox="1720 1369 1865 1409" style="text-align: center;">0.058</td> <td data-bbox="1865 1369 2011 1409" style="text-align: center;">-46%</td> </tr> <tr> <td data-bbox="1350 1409 1597 1439" style="text-align: center;">MAIFI</td> <td data-bbox="1597 1409 1720 1439" style="text-align: center;">0.002</td> <td data-bbox="1720 1409 1865 1439" style="text-align: center;">0.005</td> <td data-bbox="1865 1409 2011 1439" style="text-align: center;">117%</td> </tr> </tbody> </table>	CitiPower – 2024-25					Measure		AER Target	Actual	Variance (%)	CBD	USAIDI	8.855	5.623	-36%	USAIFI	0.108	0.058	-46%	MAIFI	0.002	0.005	117%
CitiPower – 2024-25																									
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		Urban	USAIDI	28.173	26.918	-4%
			USAIFI	0.392	0.313	-20%
			MAIFI	0.195	0.276	42%
			Telephone Answering (%)		87.43%	94.37%
4.7.2	Identify each difference (where the difference is equal to or greater than ± 10 per cent) between the AER's forecast operating expenditure and actual operating expenditure reported in Workbook 06 - operating expenditure.	Attachment 5 - CitiPower - Material differences				
4.7.3	Identify each difference (where the difference is equal to or greater than ± 10 per cent) between the AER's forecast capital expenditure by purpose and actual capital expenditure by purpose reported in Workbook 07 - capital expenditure.	Attachment 5 - CitiPower - Material differences				
4.7.4	Explain the reasons for each difference identified in the response to section 4.7.1, 4.7.2 and 4.7.3.	<p><u>4.7.1 Reliability:</u> CitiPower outperformed against the AER targets for USAIDI (i.e. unplanned SAIDI) & USAIFI (i.e. unplanned SAIFI) for CBD and Urban segments. MAIFle performance in the CBD & Urban segments were adversely affected by fault switching and transient faults on the overhead network. The network did not experience any MED's in 2024-25 and experienced favourable weather conditions with contributed to the positive performance result.</p> <p><u>4.7.1 Telephone answering:</u> Our contact centre achieved less than 10% variance to AER Target. The result we achieved was the maximum target for the telephone answering portion of the Customer Service Incentive Scheme (CSIS)</p> <p><u>4.7.2 and 4.7.3 - Attachment 5 - CitiPower - Material differences</u></p>				

Item	AER Requirements	Response
4.8 Compliance		
4.8.1	Explain the procedures and processes used by CitiPower to ensure the distribution services have been classified in accordance with the electricity distributor's current distribution determination.	For the first year of the current regulatory period FY2021-22, there was a review of the reporting changes required to comply with the current regulatory determination. No subsequent changes have been identified since the service classification remains unchanged.
4.8.2	Explain the procedures and processes used by CitiPower to ensure that the negotiated distribution service criteria, as set out in CitiPower's current distribution determination, have been applied.	We do not offer negotiated services.
4.8.3	Describe the process CitiPower has in place to identify a negative change event under clause 6.6.1(f) of the NER and the materiality threshold applied to these events.	We continuously scan for regulatory change events, service standard events, tax change events and retailer insolvency events. If a negative change event occurs, we will estimate the resulting incremental standard control service cost saving. If the estimated incremental cost saving is greater than one per cent of annual standard control revenue, we will notify the AER within 90 business days of becoming aware of the occurrence of the negative change event.
4.9 DEMAND MANAGEMENT INCENTIVE ALLOWANCE		
4.9.1	Identify each demand management incentive scheme (DMIS) eligible project and committed project for which the electricity distributor seeks approval.	Not applicable – DMIS was not claimed for FY 2024-25.
4.9.2	For each DMIS eligible project identified in the response to section 4.9.1: (a) explain how it complies with the AER's RIT-D or the minimum project evaluation requirements detailed at section 2.2.1 of the DMIS; (b) submit a demand management compliance report in accordance with section 2.4 of the DMIS.	Not applicable – DMIS was not claimed for FY 2024-25.
4.9.3	For each committed project identified in the response to section 4.9.1: (a) explain how it complies with committed project requirements as detailed at section 2.2.2 of the DMIS;	Not applicable – DMIS was not claimed for FY 2024-25.

Item	AER Requirements	Response
	(b) calculate the project incentive that each committed project can receive, in accordance with section 2.3 of the DMIS; (c) calculate total financial incentive that a distributor can accrue across all committed projects for the reporting period in accordance with section 2.5 of the DMIS; (d) submit a demand management compliance report in accordance with section 2.4 of the DMIS.	
4.9.4	Provide an overview of developments in relation to projects or programs completed in previous years of the regulatory control period, and any results to date.	Not applicable – DMIS was not claimed for FY 2024-25.
4.9.5	Provide any other required information as specified by the demand management incentive scheme.	Not applicable – DMIS was not claimed for FY 2024-25.
4.10 DEMAND MANAGEMENT INNOVATION ALLOWANCE MECHANISM		
4.10.1	Identify each demand management innovation allowance mechanism (DMIAM) eligible project for which CitiPower seeks approval.	Not applicable – DMIAM was not claimed for FY 2024-25.
4.10.2	For each DMIAM eligible project identified in the response to section 4.10.1: (a) explain how it complies with project criteria detailed at section 2.2.1 of the DMIAM; (b) submit a compliance report in accordance with section 2.3 of the DMIAM.	Not applicable – DMIAM was not claimed for FY 2024-25.
4.10.3	Provide an overview of developments in relation to projects or programs completed in previous years of the current regulatory control period, and of any results to date.	Not applicable – DMIAM was not claimed for FY 2024-25.
4.10.4	Provide any other required information as specified by the DMIAM.	Not applicable – DMIAM was not claimed for FY 2024-25.
4.11 TAX STANDARD ASSET LIVES		

Item	AER Requirements	Response
4.11.1	Identify all tax standard asset lives applied to asset classes that differ from those contained in the AER approved Post Tax Revenue Model for the reporting period.	There are no tax standard asset lives applied to asset classes that differ from those contained in the AER approved PTRM.
4.11.2	Explain the reasons for each difference identified in section 4.11.1 including reasons for any departure from the Australian Tax Office's most recent determination of effective life.	There are no tax standard asset lives applied to asset classes that differ from those contained in the AER approved PTRM.
4.12 TAX REPORTING – IMMEDIATE EXPENSING		
4.12.1	List and explain the types of capital expenditure (such as refurbishment capital expenditure and capitalised overheads) associated with the immediate expensing capital expenditure as reported in the data workbooks, if any.	Please refer to table 8.2.7 in the consolidated data workbook - CitiPower - Annual Order - 2024-25 - Consolidated data workbook – CONFIDENTIAL/PUBLIC
4.12.2	State if CitiPower has, since the last reporting period, changed and/or intends to change its tax policy on immediate expensing capital expenditure and explain the rationale for the change and impact of the change.	No change
4.13 REGULATORY INVESTMENT TEST EXPENDITURE		
4.13.1	For each project where CitiPower has incurred expenditure during the reporting period relating to a project that has undergone a RIT-D in accordance with r.5.17 of the NER and the AER's RIT-D application guidelines provide the following details: (a) the name of the RIT-D and the date on which the RIT-D process was concluded; and (b) whether the expenditure on the project is classified as augmentation expenditure or replacement expenditure.	<p>South Western CBD – Final Report Issued June 2025</p> <ul style="list-style-type: none"> • identified need was augmentation. Preferred solution is augmentation <p>Little Queen – Final Report Issued November 2024</p> <ul style="list-style-type: none"> • identified need was replacement. Preferred solution is replacement
4.14 RELATED PARTY INFORMATION		

Item	AER Requirements	Response
4.14.1	For each related party transaction reported in Workbook 09 – Revenue and financial statements, CitiPower must confirm that the contract or arrangement with the related party requires the related party to provide all relevant information to enable CitiPower to meet its reporting obligations (including allocation or attribution of costs of that related party contract) under this Order.	CitiPower confirms that all related party contracts/arrangements require the related party to provide all relevant information to enable CitiPower to meet its reporting obligation
4.15 REPORTING OF FINES AND PENALTIES		
4.15.1	Where any fine or penalty has been incurred by CitiPower during the reporting period as a result of non-compliance with: (a) a distribution safety standard; or (b) distribution reliability standard; or (c) distribution service standard; or (d) the NEL or NER; or (e) the National Electricity Retail law or National Electricity Retail Rules; or or (f) any Act or instrument referred to in s.2D(1)(b)(ii) to (v) of the NEL. CitiPower must identify and itemise each fine or penalty (including the size of each fine or penalty, and the relevant authority that levied each fine or penalty).	No fines or penalties of this nature were incurred by CitiPower in the reporting period
4.15.2	For all such fines or penalties identified in response to section 4.15.1, CitiPower must provide a statement attesting that: (a) CitiPower has not included any of that expenditure or cost, or any part of that expenditure or cost, in the operating expenditures contained in its response to this Order; and (b) CitiPower has not recovered any of that expenditure or cost, or any part of that expenditure or cost, from end users; and (c) CitiPower has not sought to pass through any of that expenditure or cost, or any part of that expenditure or cost, to end users.	Not applicable
4.15.3	Where no such fines or penalties have been identified in response to section 4.15.1, CitiPower must provide a statement attesting that no such fine or penalty has been incurred.	We attest that no such fine or penalty has been incurred

Item	AER Requirements	Response
4.15.4	The fines or penalties identified in section 4.15.1 exclude any payments made in accordance with the AER's incentive schemes (including guaranteed service level payments under Chapter 6 of the AER's service target performance incentive scheme) or any relevant jurisdictional guaranteed service level scheme.	Not applicable
4.16 TARIFF VARIATIONS		
4.16.1	CitiPower must provide an explanation of the timing and nature of any material changes in the level and structure of tariffs in the reporting period.	There were no changes to tariff structures and no material changes to the level of tariffs
4.16.2	CitiPower must provide an explanation of any material tariff re-assignments in the reporting period.	CitiPower re-assigns customers to the appropriate tariff if their consumption level changes to the extent that they are no longer on the appropriate tariff
4.17 VEGETATION MANAGEMENT		
4.17.1	CitiPower must provide a list of regulations that result in a material cost on performing vegetation management works (including, but not limited to, bushfire mitigation regulations).	<p>A list of regulations that impose a material cost on performing vegetation management works (including but is not limited to, bushfire mitigation regulations);</p> <ul style="list-style-type: none"> • Electricity Safety Act 1998 • Electricity Industry Act 2000 • Electricity Safety (Bushfire Mitigation) Regulations 2013 • Electricity Safety (Electric Line Clearance) Regulations 2020 • Electricity Safety Management Scheme • Electricity Safety (General) Regulations 2019 • Environment Protection and Biodiversity Conservation Act 1999 • Flora and Fauna Guarantee Act 1988 • Occupational Health and Safety Act • Occupational Health & Safety (Plant) Regulations 1995

Item	AER Requirements	Response
		<ul style="list-style-type: none"> • Green Book - Code of Practice on electrical safety for distribution businesses in the Victorian Electrical Supply Industry • CitiPower Electric Line Clearance Management Plan • CitiPower Bushfire Mitigation Plan
4.17.2	CitiPower must provide a list of self-imposed standards from the electricity distributor's vegetation management program.	<p>A list of self-imposed standards from CitiPower's vegetation management program</p> <ul style="list-style-type: none"> • CitiPower Field reference guide (Health and Safety of contractors performing the work)
4.17.3	CitiPower must provide an explanation of the cost impact of regulations and self-imposed standards on performing vegetation management work in the reporting period.	Attachment 7 - CitiPower - Veg Management Cost Impacts of Regulation
4.18 RECONCILIATION OF EXPENDITURE		
4.18.1	CitiPower must identify all non-network operating expenditures items that have been reported against more than one operating expenditure category. The report must specify the relevant categories and expenditure amounts, for each non - network expenditure item allocated to multiple categories and enable reconciliation to total non-network operating expenditure reported on a mutually exclusive/collectively exhaustive basis to meet the requirement for Opex by purpose.	N/A
4.19 BENCHMARKING ASSET BASE		
4.19.1	<p>If CitiPower wishes to report benchmarking asset base values in accordance with the Optional additional approach set out in Appendix A Data workbook instructions, Section 8.1.5 Optional additional approach, it must:</p> <p>a) Submit the economic benchmarking asset base tables prepared using the optional additional approach as a separate data submission</p>	CitiPower is not reporting benchmarking asset base values in accordance with the Optional additional approach set out in Appendix A Data workbook instructions

Item	AER Requirements	Response
	b) Provide a basis of preparation detailing the estimation of the asset base data.	
4.20 TAXABLE INCOME ADJUSTMENTS		
4.20.1	CitiPower must provide in its basis of preparation, the methodology used to determine the permanent differences due to disallowed interest expenditure and specify the interest expenditures it has assessed to be non-deductible.	CitiPower - Annual Order - 2024-25 - Basis of Preparation
4.20.2	CitiPower must provide in its basis of preparation, details of the prior year tax adjustments, including the reasons for the change (e.g. change in legislation, court judgment or Australian Tax Office correspondence where relevant).	N/A
4.20.3	If CitiPower has reported tax losses carried forward in Workbook 09 - Revenue and financial statements it must provide an explanation of the factors that have resulted in the carried forward tax losses.	N/A
4.20.4	CitiPower must report any tax losses that have been used by the electricity distributor during the regulatory year. CitiPower must provide supporting calculations for the tax losses used.	N/A
4.21 INTEREST EXPENDITURE		
4.21.1	CitiPower must provide in its basis of preparation, in relation to its interest expenditure: a) a description and explanation of the methodology used to allocate the interest expenditure. This methodology should provide: i. the specific debt that has been allocated to CitiPower's core regulated services; ii. the general debt that has been allocated CitiPower's core regulated services;	CitiPower - Annual Order - 2024-25 - Basis of Preparation

Item	AER Requirements	Response
	<p>iii. the method used to allocate the specific debt and general debt between the regulated and unregulated assets held at the group level and also to the core regulated services; and</p> <p>iv. the method used to allocate related party interest to CitiPower's core regulated services, to the extent related party debt has been included in the specific or general debt allocations; and</p> <p>b) if available or applicable CitiPower, details of the characteristics of the portfolio of debt being allocated to CitiPower, including:</p> <p>i. the value of drawn debt allocated to CitiPower's core regulated services;</p> <p>ii. the portfolio-weighted average term of debt instruments giving rise to interest expense reported; and</p> <p>iii. any additional detail in its basis of preparation, that CitiPower would consider relevant in understanding the allocated interest expenditure</p>	
4.22 SMALL SCALE INCENTIVE SCHEMES		
Customer service incentive scheme		
4.22.1	For every reporting year for which a customer service incentive scheme applies to CitiPower, the electricity distributor must report the information specified in the AER's regulatory determination that applied the scheme (applicable regulatory determination). The information must be reported in a form consistent with the requirements set out in the applicable regulatory determination, or as otherwise agreed with the AER.	The information has been reported consistent with the requirements set out in the applicable regulatory determination, or as otherwise agreed with the AER. Please refer to CitiPower - Annual Order - 2024-25 - CSIS - PUBLIC
4.22.2	Information reported under section 4.22.1 is required to be included in the basis of preparation submitted by CitiPower.	Basis of preparation in relation to the above has been included. Please refer to CitiPower - Annual Order - 2024-25 - Basis of Preparation
4.22.3	Information reported under 4.22.1 is subject to the assurance requirements set out in the applicable regulatory determination.	Information reported has been subjected to third party reassurance Please refer to: Attachment 9a - CitiPower - Independent Audit Report - Non-Financial

Item	AER Requirements	Response
		Attachment 9b - CitiPower - Independent Audit Report - Actual Financial Attachment 9c - CitiPower - Independent Audit Report - Estimated Financial
Export service incentive scheme		
4.22.4	For every reporting year for which an export service incentive scheme applies to CitiPower, the electricity distributor must report the information specified in the applicable regulatory determination that applied the scheme. The information must be reported in a form consistent with the requirements set out in the applicable regulatory determination, or as otherwise agreed with the AER.	Not applicable
4.22.5	Information reported under section 4.22.4 is required to be included in the basis of preparation submitted by CitiPower.	Not applicable
4.22.6	Information reported under 4.22.4 is subject to the assurance requirements set out in the applicable regulatory determination.	Not applicable
4.23 LARGE PROJECTS		
4.23.1	For each large project reported in Workbook 07 – Capital expenditure CitiPower must report: <ul style="list-style-type: none"> a) the date of an AER determination to incorporate the expenditure forecast for the large project into the maximum allowed revenues for CitiPower b) whether the project is a contingent project (as defined in the NER) c) the expenditure forecast for the reporting year; the difference between forecast and actual expenditure; and drivers of the difference. 	Not applicable
4.24 CIRCUIT CAPACITY		

Item	AER Requirements	Response
4.24.1	CitiPower must describe in its basis of preparation the methodology used to estimate circuit capacities reported in Workbook 03 – Network metrics – Circuit capacity.	Please refer to sections 3.5.1.3 and 3.5.1.4 in CitiPower - Annual Order - 2024-25 - Basis of Preparation
4.24.2	CitiPower must explain any changes in methodology used to estimate circuit capacity implemented for the reporting period.	Please refer to sections 3.5.1.3 and 3.5.1.4 in CitiPower - Annual Order - 2024-25 - Basis of Preparation