



DRAFT DECISION
Evoenergy
Access Arrangement

2021 to 2026

Attachment 9
Reference tariff setting

November 2020

© Commonwealth of Australia 2020

This work is copyright. In addition to any use permitted under the Copyright Act 1968, all material contained within this work is provided under a Creative Commons Attributions 3.0 Australia licence, with the exception of:

- the Commonwealth Coat of Arms
- the ACCC and AER logos
- any illustration, diagram, photograph or graphic over which the Australian Competition and Consumer Commission does not hold copyright, but which may be part of or contained within this publication. The details of the relevant licence conditions are available on the Creative Commons website, as is the full legal code for the CC BY 3.0 AU licence.

Requests and inquiries concerning reproduction and rights should be addressed to the:

Director, Corporate Communications
Australian Competition and Consumer Commission
GPO Box 4141, Canberra ACT 2601

or publishing.unit@acc.gov.au.

Inquiries about this publication should be addressed to:

Australian Energy Regulator
GPO Box 520
Melbourne Vic 3001

Tel: 1300 585 165

Email: AERInquiry@aer.gov.au

AER reference: 65197

Note

This attachment forms part of the AER's draft decision on the access arrangement that will apply to Evoenergy for the 2021–26 access arrangement period. It should be read with all other parts of the draft decision.

The draft decision includes the following documents:

Overview

Attachment 1 – Services covered by the access arrangement

Attachment 2 – Capital base

Attachment 3 – Rate of return

Attachment 4 – Regulatory depreciation

Attachment 5 – Capital expenditure

Attachment 6 – Operating expenditure

Attachment 7 – Corporate income tax

Attachment 8 – Efficiency carryover mechanism

Attachment 9 – Reference tariff setting

Attachment 10 – Reference tariff variation mechanism

Attachment 11 – Non-tariff components

Attachment 12 – Demand

Attachment 13 – Capital expenditure sharing scheme

Contents

Note	2
Contents	3
9 Reference tariff setting	4
9.1 Draft decision	4
9.2 Evoenergy’s proposal	4
9.2.1 Tariff classes	4
9.2.2 Ancillary activities	6
9.3 Assessment approach	7
9.4 Reasons for draft decision	9
9.4.1 Tariff structure	9
9.4.2 Allocation of revenues and costs to reference tariffs	11
9.4.3 Establishment of tariff classes	11
9.4.4 Tariff classes and revenue limits	11
Shortened forms	16

9 Reference tariff setting

This attachment outlines our assessment of the reference tariffs proposed by Evoenergy against the requirements of the National Gas Rules (NGR). Our assessment focuses on the structure of reference tariffs and takes into account the revenue and pricing principles.¹

9.1 Draft decision

We accept Evoenergy's proposed changes to its reference tariff classes, tariff categories and ancillary charges for the 2021–26 access arrangement period. We are satisfied the proposed structure of the reference tariffs complies with the requirements of the NGR.

We are also satisfied that Evoenergy is retaining its declining block tariff structure as this is consistent with the price cap form of control.

Our reasons for our draft decision are set out below.

9.2 Evoenergy's proposal

As part of the 2021–26 access arrangement, Evoenergy proposed to²:

- simplify its tariffs by abolishing a number of tariffs which have zero or very few customers on them
- combine residential and business tariffs into one class
- simplify the process for demand customers to reset their chargeable demand
- make a number of minor amendments to reference tariff setting
- make the ancillary charges more cost reflective.

Evoenergy did not propose to make changes to the current declining block tariff structure.

9.2.1 Tariff classes

Table 9.1 shows the tariffs offered by Evoenergy in the 2016–21 access arrangement period³ and identifies the tariffs that have been abolished (crossed out) in Evoenergy's proposed 2021–26 access arrangement. Evoenergy proposed to abolish the VRH, VBS, VBM, VRG, and DBG tariffs to reduce complexity and administrative costs.

¹ NGL, ss. 24(2)–(7).

² Evoenergy, *Overview – Access arrangement information, ACT and Queanbeyan-Palerang gas network 2021–26*, June 2020, p. 34.

³ Evoenergy, *Attachment 10 – Reference services and tariffs, Access arrangement information, ACT and Queanbeyan-Palerang gas network 2021–26*, June 2020, section 10.4.2, p. 10-5.

Evoenergy submitted that these changes are not expected to impact end-customers given the network tariffs are not currently reflected in retail tariffs.⁴

Table 9.1 Evoenergy's proposed amendments to the initial tariff classes and tariff charge components

Customer category	Tariff class	Tariff category	Charge components
Volume (V)	Residential (R)	Residential individually metered (VRI)	One fixed charge Four volume block charges Ancillary reference charges
		Residential individually metered with gas heating and other gas appliances (VRH)	One fixed charge Three volume block charges Ancillary reference charges
		Residential boundary metered (VRB)	One fixed charge Three volume block charges Ancillary reference charges
	Business (B)	Large scale generation principally for residential end customers (VRG)	One fixed charge Three capacity block charges Ancillary reference charges
		Small business individually metered (VBS)	One fixed charge Three volume block charges Ancillary reference charges
		Medium business individually metered (VBM)	One fixed charge Three volume block charges Ancillary reference charges
Demand (D)	Business (B)	Major customer capacity (DBC)	One provision of basic metering equipment charge Three demand capacity block charges Ancillary reference charges
		Major customer throughput (DBT)	One provision of basic metering equipment charge One volume charge Ancillary reference charges
		Demand business large scale generation (DBG)	One provision of basic metering equipment charge Three demand capacity block charges Ancillary reference charges

⁴ Evoenergy, *Attachment 10 – Reference services and tariffs, Access arrangement information, ACT and Queanbeyan-Palerang gas network 2021–26*, June 2020, section 10.4.2.1, p. 10-6.

Evoenergy’s proposed tariff structure and charge components are set out in Table 9.2.

Table 9.2 Evoenergy's proposed tariff structure and charge components for haulage services

Reference service	Tariff class	Tariff categories	Charge components
Haulage Reference Service	Volume (V)	Residential individually metered (VI)	One fixed charge Four volume block charges
		Medium business individually metered (VB)	One fixed charge Three volume block charges
	Demand (D)	Major customer capacity (DC)	One fixed charge Three demand capacity block charges
		Major customer throughput (DT)	One fixed charge One usage charge

9.2.2 Ancillary activities

Evoenergy proposed to maintain the same ancillary activities as in the 2016–21 access arrangement period other than proposing to implement a new threshold for different levels of charges.

The current threshold between different levels of ancillary service tariffs is based on meter size of 6m³/hr and whether the customer is a residential or business customer. For the 2021–26 access arrangement period, Evoenergy proposed to change the threshold to 25m³/hr meter size and no longer refer to residential or business customer types.

Evoenergy proposed that its new threshold, or split, is more reflective of its costs given that the cost to provide service is driven more by meter size than customer classification.⁵

Table 9.3 sets out Evoenergy’s current and proposed ancillary activities where no changes have been made to the special meter reads or request for service categories. However, disconnection fee, reconnection fee and the decommissioning and meter removal have been amended.

⁵ Evoenergy, *Attachment 10 – Reference services and tariffs, Access arrangement information, ACT and Queanbeyan-Palerang gas network 2021–26*, June 2020, section 10.4.4, p. 10-10.

Table 9.3 Evoenergy's current and proposed ancillary activities

Ancillary reference service	Description of service	Proposed amendments
Special meter reads	Meter reading for a delivery point that is in addition to the scheduled meter reading	No change
Disconnection Fee	Disconnection to prevent the withdrawal of gas at the delivery point (the method of disconnection is at the discretion of Evoenergy)	Different charges to apply for below and above 25m ³ /hr rather than current residential / business (6m ³ /hr) split
Reconnection Fee	Reconnection to allow the withdrawal of gas at the delivery point but only where the equipment to allow the withdrawal of gas is still present at the delivery point	Different charges to apply for below and above 25m ³ /hr rather than current residential / business (6m ³ /hr) split
Decommissioning and meter removal	Removal of a meter and the permanent decommissioning of a network connection (the method of disconnection is at the discretion of Evoenergy)	Different charges to apply for below and above 25m ³ /hr rather than current residential / business (6m ³ /hr) split
Request for service	Network users wishing to obtain a transport service for a delivery point must submit a request for service in accordance with the request-for-service procedure set out in the access arrangement.	No change

9.3 Assessment approach

In an access arrangement, a service provider is required to specify for each reference service, the reference tariff and the proposed approach to the setting of reference tariffs.⁶ This is done by:

- explaining how revenues and costs are allocated, including the relationship between costs and tariffs⁷
- defining the tariff classes⁸
- comparing the revenue to be raised by each reference tariff with the cost of providing each individual reference service⁹
- explaining and describing any pricing principles it employed.^{10,11}

⁶ NGR, rr. 48(1)(d)(i), 72(1)(j)(i), 72(1)(j)(ii).

⁷ NGR, rr. 93(1)–(2).

⁸ NGR, rr. 94(1)–(2).

⁹ NGR, r. 94(3).

¹⁰ NGR, rr. 94(3)–(4).

¹¹ NGR, rr. 48(1)(d)(i), 72(1)(j)(i), 72(1)(j)(ii).

We are required to assess Evoenergy's proposed reference tariffs. Where we do not accept them, we must determine the initial reference tariffs to apply for each reference service.

In our assessment of the proposed reference tariffs, we reviewed Evoenergy's:

- access arrangement information¹²
- access arrangement proposal¹³
- explanation of proposed revisions to the 2016–21 access arrangement.

We also had regard to submissions received in the course of our consultation on the proposed access arrangement.¹⁴

Identifying the reference service

Service providers are required by the NGR to specify a reference tariff for each reference service.¹⁵ We first consider what is (or are) the reference service(s) for the purpose of the NGR when undertaking our review. Our decision on what constitutes the reference service is set out in Attachment 1 to this draft decision.

Assessing the tariff setting method for the reference service

The reference tariffs for a full access arrangement must be designed to meet the requirements of the NGR. Our discretion on tariff design is limited.¹⁶

Consequently, we consider how Evoenergy intends to charge for reference services by:

1. Assessing how Evoenergy intends to allocate costs and revenues between reference services and other services. It must demonstrate that total revenue is allocated between reference and other services in the ratio in which costs are allocated between reference services and other services. Furthermore, costs must also be allocated to the reference service and other services to which the cost is directly attributable.¹⁷
2. Assessing how Evoenergy grouped its customers into tariff classes. Evoenergy is required to group together customers for reference services on an economically efficient basis and to avoid unnecessary transaction costs.¹⁸ We consider the

¹² Evoenergy, *Overview – Access arrangement information, ACT and Queanbeyan-Palerang gas network 2021–26*, June 2020, section 3.10; Evoenergy, *Attachment 10 – Reference services and tariffs, Access arrangement information, ACT and Queanbeyan-Palerang gas network 2021–26*, June 2020.

¹³ Evoenergy, *Access arrangement for the ACT and Queanbeyan-Palerang Regional gas distribution network, 1 July 2021 – 30 June 2026*, June 2020.

¹⁴ NGR, r. 59.

¹⁵ NGR, r. 48(1)(d)(i).

¹⁶ NGR, r. 94(6).

¹⁷ NGR, r. 93(2).

¹⁸ NGR, r. 94(2).

nature of the reference service (e.g. volume and demand tariff classes) are consistent with the need to group customers for reference services together on an economically efficient basis and avoid unnecessary transaction costs.

3. Assessing how:

- (a) the expected average revenue of a tariff class compares with the standalone cost and avoidable cost of providing the reference service to that tariff class
- (b) whether the tariff takes into account transaction costs associated with developing and applying the tariff
- (c) whether the tariffs take into account the long run marginal costs of providing reference services
- (d) whether customers belonging to the relevant tariff class are able or likely to respond to price signals.¹⁹

9.4 Reasons for draft decision

We accept Evoenergy's proposed new tariff structure. We also consider it is compliant with the requirements of the NGR.²⁰ A number of submissions supported Evoenergy's proposed new tariff structure.

The remainder of this attachment sets out the reasons for our draft decision under the following headings:

- tariff structure
- the allocation of revenues and costs to reference tariffs
- the establishment of tariff classes
- tariff classes and revenue limits.

9.4.1 Tariff structure

We received a number of submissions on Evoenergy's proposed tariffs on the following topics:

- new tariff structure
- NSW tariff
- declining block tariffs and local government policy

New tariff structure

Stakeholder submissions broadly supported Evoenergy's proposed new tariff structure and measures to simplify existing tariffs. We also support this proposed change and

¹⁹ NGR, rr. 94(3)–(4).

²⁰ NGR, rr. 93–94.

consider it is compliant with the requirements of the NGR.²¹ Therefore, we accept Evoenergy's proposed new tariff structure.

NSW tariff

A submission from the Consumer Challenge Panel (CCP24) suggested that we consider directing Evoenergy to establish a separate NSW tariff. This is because of the risk of a reduction in connections under the ACT Government's environmental policy to establish zero net emissions by 2045. In CCP24's view, this would give rise to stranded asset risk being borne by NSW customers for ACT assets.

CCP24 commented that the 2021–26 period would seem an appropriate time to start implementing a medium- to long-term pricing policy, an element of which would be differential tariffs for ACT and NSW customers.

While we agree with CCP24 that Evoenergy's customers bear stranded asset risk, we also note the future of Evoenergy's network is currently uncertain. Implementing a change to the current postage stamp pricing approach would be a significant step to take given its immediate impact on customers. At present we do not think such a step is warranted.

Declining block tariffs and ACT Government policy

We are satisfied that Evoenergy is retaining its declining block tariff as this is consistent with the price cap form of control. We consider the structure of declining block tariffs is well known to Evoenergy's customers and its continuation in the 2021–26 access arrangement will allow customers to respond to the prices within each block (or band) by adjusting their consumption. Doing so will reduce their overall network charges.

We received submissions in support of the declining block tariff.²² However, it was also noted in some submissions that declining block tariffs may be inconsistent with the ACT Government's policy to reduce demand for gas. Also, that declining block tariffs raise equity concerns for disadvantaged customers who would typically consume smaller quantities of gas and therefore pay higher per unit network tariffs than customers consuming larger quantities.

Evoenergy noted in its 2021–26 access arrangement revisions proposal that similar comments were provided during its own stakeholder consultation process. In response, Evoenergy noted that declining block tariffs benefit all customers by incentivising greater gas consumption and therefore lowering per unit network costs.

²¹ NGR, rr. 93–94.

²² Origin Energy, *Evoenergy access arrangement proposal*, August 2020, p. 1; ACTCOSS, *Submission: Evoenergy's gas network 2021–26 access arrangement proposal to the Australian Energy Regulator*, August 2020, p. 21.

Evoenergy correctly described the principle underlying both the price cap form of control and application of declining block tariff structures. Interactions between emissions policies and gas network tariffs may be further explored in future gas network determinations or through standalone policy projects but at this time we consider application of price caps and declining block tariffs remains in the long term interest of gas network customers.

9.4.2 Allocation of revenues and costs to reference tariffs

We are satisfied Evoenergy's approach to allocating revenue and costs between reference services and non-reference services comply with the NGR²³ for the following reasons:

- Evoenergy's proposed costs relating to its reference services do not include costs incurred (and recovered) from the provision of its non-reference services.
- Evoenergy has not allocated the non-reference service revenue to a reference service because the underlying costs have not been included in Evoenergy's building block revenues.
- Evoenergy's proposal included information outlining its standalone costs, long run marginal costs and incremental costs.

9.4.3 Establishment of tariff classes

Evoenergy has grouped its customers by the nature of the haulage reference service (volume or demand).²⁴ We consider that these characteristics are likely to be the driver of costs within Evoenergy's gas distribution network. We are satisfied that the proposed tariff classes are consistent with the requirements of the NGR.²⁵

9.4.4 Tariff classes and revenue limits

We consider Evoenergy's proposed reference tariffs to be consistent with the NGR requirements for tariff classes and revenue limits. We assessed Evoenergy's tariff classes and revenue limits against the following NGR considerations:

- (a) whether the expected average revenue of a tariff class compares with the standalone cost and avoidable cost of providing the reference service to that tariff class
- (b) whether the tariff takes into account transaction costs associated with developing and applying the tariff

²³ NGR, rr. 93(1)–(2).

²⁴ Evoenergy, *Attachment 10 – Reference services and tariffs, Access arrangement information, ACT and Queanbeyan-Palerang gas network 2021–26*, June 2020, pp. 10-4 to 10-10.

²⁵ NGR, rr. 94(1)–(2).

- (c) whether the tariffs take into account the long run marginal costs of reference services
- (d) whether customers belonging to the relevant tariff class are able, or likely, to respond to price signals.²⁶

Standalone and avoidable costs

We consider that Evoenergy's proposed reference tariffs are consistent with the NGR requirements²⁷ because the expected revenue to be recovered lies on or between:

- an upper bound representing the standalone cost of providing the reference service to customers who belong to that tariff class; and
- a lower bound representing the avoidable cost of not providing the reference service to those customers.²⁸

Transaction costs

We are satisfied that Evoenergy's proposed reference tariffs take into account transaction costs associated with the tariff and the need to avoid them where possible.²⁹ We considered Evoenergy has undertaken best endeavours to minimise transaction costs across access arrangements.

However, we acknowledge that additional administrative costs will be incurred in the transition to the new tariff structure. We consider these to be one-off costs that are unavoidable. We also consider the benefits of the proposed tariff structure—such as more cost reflective pricing and increasing customers' ability to respond to price signals—outweigh these incremental administrative costs.

Long run marginal cost

Evoenergy used the Average Incremental Cost approach to calculate the long run marginal cost (LRMC) by tariff class.³⁰

We note our discretion under the NGR on LRMC is limited.³¹ However, we consider the approach taken by Evoenergy is generally consistent with that applied by other gas

²⁶ NGR, r. 94.

²⁷ NGR, r. 94(3).

²⁸ Evoenergy, *Attachment 10 – Reference services and tariffs, Access arrangement information, ACT and Queanbeyan-Palerang gas network 2021–26*, June 2020, pp. 10-11 to 10-12; Houston Kemp 2015, *Development of a cost of service model for the ACT, Queanbeyan and Palerang gas distribution network: A report for ActewAGL Distribution*, June.

²⁹ NGR, rr. 94(2), 94(4).

³⁰ Evoenergy, *Attachment 10 – Reference services and tariffs, Access arrangement information, ACT and Queanbeyan-Palerang gas network 2021–26*, June 2020, pp. 10-12 to 10-13; Houston Kemp 2015, *Development of a cost of service model for the ACT, Queanbeyan and Palerang gas distribution network: A report for ActewAGL Distribution*, June.

³¹ NGR, r. 94(6).

distribution networks and has historical precedent in past access arrangements. At any rate, we observe that the calculated values of LRMC are sensitive to the assumptions made around a number of different variables. As such, these should only be used as a guide when assessing price levels and structures, rather than be considered definitive.

Response to price signals

We are satisfied Evoenergy’s proposed reference tariffs have been determined having regard to whether customers are able or likely to respond to price signals.³²

The proposed tariff structure provides for more cost reflective tariffs which will send more appropriate price signals to end customers about their use of the network. These price signals will allow customers to make more informed choices about how they utilise the network.

Table 9.4 Evoenergy's proposed amendments to reference tariff setting

Clause	Summary of proposed change	Draft decision
Services Policy		
Services (clauses 2.1-2.4)	<ul style="list-style-type: none"> Amended the name of the reference service from “Haulage Reference Service” to “Reference Service” to reflect that Evoenergy only offers a single reference service (and made a consequential change to the definition of “Haulage Reference Tariff”). 	Accept
	<ul style="list-style-type: none"> Minor amendment to change the defined term “Services” to “Pipeline Services” to reflect the language of the NGL and NGR. 	Accept
	<ul style="list-style-type: none"> Capitalised the term “Delivery Point”, which is defined in Schedule 1 (applicable to the Reference Service and its use in relation to the “Interconnection Service”, see “Non- Reference Services” below). 	Accept
Terms and conditions of the reference service (clause 2.5)	Deleted clause 2.6, which simply reflects the position under the NGR.	Accept
Non-reference service (clause 2.6)	<ul style="list-style-type: none"> Corrected the reference to “Interconnection of Embedded Network Service” to an “Interconnection Service” in line with the change discussed in “Interconnection Service” below. 	Accept
	<ul style="list-style-type: none"> Corrected the reference to “Negotiated Services” to the singular. 	Accept
Interconnection service (clause 2.7)	<ul style="list-style-type: none"> Redefined the “Interconnection of Embedded Network Service” to an “Interconnection Service” and made amendments to reflect that the Interconnection Service is provided for the establishment of: <ul style="list-style-type: none"> a Delivery point to enable delivery of gas from the Network to a “Downstream Network”; or a Receipt Point to enable delivery of gas into the Network from an “Upstream Facility” such as a pipeline or gas production. 	Accept
		Accept

³² NGR, r. 94(4)(b)(ii).

Clause	Summary of proposed change	Draft decision
	<ul style="list-style-type: none"> Added definitions of “Upstream Facility” and “Downstream Network” to Schedule 1. 	Accept
	<ul style="list-style-type: none"> Replaced the definitions of “Embedded Network” and “Embedded Network Operator” with “Downstream Network” to avoid the potential for confusion with connections of embedded network providers (e.g. for high-rise buildings and shopping centres) which are covered by the connection procedures under chapter 12A of the NGR. 	Accept
	<ul style="list-style-type: none"> Replaced the reference to Schedule 6 with a reference to the Operational Schedule (Schedule 7) in light of the amendments to those Schedules discussed below. 	Accept
Negotiated services (clause 2.8)	<ul style="list-style-type: none"> Corrected the references to “Negotiated Services” to the singular. Simplified drafting by using defined term of “Service Agreement” rather than the separate defined term “Negotiated Service Agreement” (which falls within the definition of “Service Agreement”). Deleted previous clause 2.9, which simply reflects the position under the NGL. 	Accept Accept Accept
Requests for Services (clause 2.10)	Clarified the drafting given proposed amendments to (proposed) section 13 (Queuing) (for the reasons set out in “Queuing” below).	Accept
Tariff Categories for Reference Services		
Tariff category assignment (Section 9)	<ul style="list-style-type: none"> Inserted introductory clause 9.1 to clarify that this section applies to all Delivery Points that receive the Reference Service and added defined term “Tariff Assignment Criteria” to simplify the drafting in this section. Simplified the drafting in clause 9.3. In clause 9.7(a), included defined terms “Customer” and “End Consumer”. The definition of “End Consumer” is included by reference to the RSA in Schedule 1. Amended clause 9.8 to simplify drafting. 	Accept Accept Accept Accept
Initial Reference Tariff Schedule		
Introduction (Schedule 3, part 1)	Minor updates for consistency in the use of defined terms and to improve readability. An explanation of the key changes to this Schedule is set out in Attachment 10.	Accept
Tariff assignment criteria and Initial tariff categories and tariff charge components (Schedule 3, part 2)	<p>Key changes include:</p> <ul style="list-style-type: none"> Simplified tariff category assignment by removing the concept of customer groups, referring instead only to tariff classes. Simplified the tariff categories by abolishing VRH, VBS, VBM and VRG volume tariff categories and DBG demand tariff category. The take up of these tariff categories has been low and it is therefore proposed that they be abolished to avoid unnecessary administrative costs. This leaves two demand tariff categories (“Demand Capacity” and “Demand Throughput”) and two volume tariff categories (“Volume Individual” and “Volume Boundary”). Deleted assignment criteria that are no longer relevant in light of the proposed abolition of tariff categories. Deleted the example from clause 2.4(d) as it is no longer relevant. Minor updates for consistency in the use of defined terms and to improve readability. 	Accept Accept Accept Accept
Initial reference Tariffs	<ul style="list-style-type: none"> Updated the unit rates for the initial reference tariffs. Amendments to reflect changes to the terminology used in the RSA. 	Accept Accept

Clause	Summary of proposed change	Draft decision
(Schedule 3, part 4)	<ul style="list-style-type: none"> Renaming the 'Decommissioning and meter removal' service to 'Abolishment' (to avoid the potential for confusion with temporary decommissioning) and changing the charges structure to a more cost-reflective structure. Included a new part 5 providing for the setting of initial chargeable demand for Delivery Points existing at the Commencement Date. Adjustments to the basis on which some of the ancillary charges are applied. 	<p>Accept</p> <p>Accept</p> <p>Accept</p>
<p>Grandfathering of provision of basic metering equipment charges for more than 15 delivery stations installed at a delivery point</p> <p>(Schedule 3, part 6)</p>	<p>Updated the grandfathering provision to reflect that the 2021–26 AA is grandfathering tariffs that were available in the 2016 AA period only through the grandfathering provision in that 2016–21 AA (i.e. and were not tariffs otherwise provided for in that AA).</p>	<p>Accept</p>

Shortened forms

Shortened form	Extended form
AA	Access arrangement
ACT	Australian Capital Territory
AER	Australian Energy Regulator
CCP / CCP24	Consumer Challenge Panel, sub-panel 24
JGN	Jemena Gas Networks (NSW) Ltd
LRMC	Long run marginal cost
NGL	National Gas Law
NGR	National Gas Rules
NSW	New South Wales
RSA	Reference Service Agreement