

 FINAL DECISION

TransGrid transmission determination

 2015−16 to 2017−18

Attachment 5 – Regulatory depreciation

(Substituted)

July 2015

© Commonwealth of Australia 2015

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@accc.gov.au.

Inquiries about this publication should be addressed to:

Australian Energy Regulator
GPO Box 520
Melbourne Vic 3001

Tel: (03) 9290 1444
Fax: (03) 9290 1457

Email: AERInquiry@aer.gov.au

AER reference: 53444

Amendment record

|  |  |
| --- | --- |
| Version | Date |
| 1. 01
 | 1. 30 April 2015
 |
| 1. 02
 | 1. 3 July 2015
 |

1. Note
2. This attachment forms part of the AER's final decision on TransGrid’s revenue proposal for 2015–18. It should be read with other parts of the final decision.
3. The final decision includes the following documents:
4. Overview
5. Attachment 1 – maximum allowed revenue
6. Attachment 2 – regulatory asset base
7. Attachment 3 – rate of return
8. Attachment 4 – value of imputation credits
9. Attachment 5 – regulatory depreciation
10. Attachment 6 – capital expenditure
11. Attachment 7 – operating expenditure
12. Attachment 8 – corporate income tax
13. Attachment 9 – efficiency benefit sharing scheme
14. Attachment 10 – capital expenditure sharing scheme
15. Attachment 11 – service target performance incentive scheme
16. Attachment 12 – pricing methodology
17. Attachment 13 – pass through events

Attachment 14 – negotiated services

1. Contents

[Note 5-2](#_Toc423606703)

[Contents 5-3](#_Toc423606704)

[Shortened forms 5-4](#_Toc423606705)

[5 Regulatory depreciation 5-6](#_Toc423606706)

[5.1 Final decision 5-6](#_Toc423606707)

[5.2 TransGrid’s revised proposal 5-7](#_Toc423606708)

[5.3 AER’s assessment approach 5-8](#_Toc423606709)

[5.4 Reasons for final decision 5-8](#_Toc423606710)

[5.4.1 Standard asset lives 5-8](#_Toc423606711)

[5.4.2 Remaining asset lives 5-9](#_Toc423606712)

1. Shortened forms

| 1. Shortened form
 | 1. Extended form
 |
| --- | --- |
| 1. AARR
 | 1. aggregate annual revenue requirement
 |
| 1. AEMC
 | 1. Australian Energy Market Commission
 |
| 1. AEMO
 | 1. Australian Energy Market Operator
 |
| 1. AER
 | 1. Australian Energy Regulator
 |
| 1. ASRR
 | 1. annual service revenue requirement
 |
| 1. augex
 | 1. augmentation expenditure
 |
| 1. capex
 | 1. capital expenditure
 |
| 1. CCP
 | 1. Consumer Challenge Panel
 |
| 1. CESS
 | 1. capital expenditure sharing scheme
 |
| 1. CPI
 | 1. consumer price index
 |
| 1. DRP
 | 1. debt risk premium
 |
| 1. EBSS
 | 1. efficiency benefit sharing scheme
 |
| 1. ERP
 | 1. equity risk premium
 |
| 1. MAR
 | 1. maximum allowed revenue
 |
| 1. MRP
 | 1. market risk premium
 |
| 1. NEL
 | 1. national electricity law
 |
| 1. NEM
 | 1. national electricity market
 |
| 1. NEO
 | 1. national electricity objective
 |
| 1. NER
 | 1. national electricity rules
 |
| 1. NSP
 | 1. network service provider
 |
| 1. NTSC
 | 1. negotiated transmission service criteria
 |
| 1. opex
 | 1. operating expenditure
 |
| 1. PPI
 | 1. partial performance indicators
 |
| 1. PTRM
 | 1. post-tax revenue model
 |
| 1. RAB
 | 1. regulatory asset base
 |
| 1. RBA
 | 1. Reserve Bank of Australia
 |
| 1. repex
 | 1. replacement expenditure
 |
| 1. RFM
 | 1. roll forward model
 |
| 1. RIN
 | 1. regulatory information notice
 |
| 1. RPP
 | 1. revenue and pricing principles
 |
| 1. SLCAPM
 | 1. Sharpe-Lintner capital asset pricing model
 |
| 1. STPIS
 | 1. service target performance incentive scheme
 |
| 1. TNSP
 | 1. transmission network service provider
 |
| 1. TUoS
 | 1. transmission use of system
 |
| 1. WACC
 | 1. weighted average cost of capital
 |

# Regulatory depreciation

The AER is required to decide on the indexation of the regulatory asset base (RAB) and depreciation building blocks for TransGrid's 2014–18 period.[[1]](#footnote-1) We use regulatory depreciation to model the nominal asset values over the regulatory control period, and set the depreciation allowance in the annual building block revenue requirement. The regulatory depreciation allowance (or return of capital) is the net total of the straight-line depreciation (negative) and the indexation of the RAB (positive).

This attachment sets out our final decision on TransGrid's regulatory depreciation allowance. It also presents our final decision on the revised proposed depreciation schedules, including the revised proposed standard and remaining asset lives to be used for forecasting depreciation allowances.

## Final decision

We determine TransGrid's regulatory depreciation allowance is $ 453.3 million ($ nominal) for the 2014–18 period, which is an increase of $29.5 million (or 7 per cent) from its revised proposal.

We accept TransGrid's proposed depreciation method set out in its revised proposal. However, our final decision on TransGrid's regulatory depreciation allowance for the 2014–18 period differs from its revised proposal. This is because of our:

* updates to TransGrid's remaining asset lives as at 1 July 2014 to reflect actual capex in 2013–14 (section 5.4.2)
* determinations on other components of TransGrid's revised proposal which affect the forecast regulatory depreciation allowance—for example, the opening RAB value (attachment 2), forecast inflation (attachment 3) and forecast capex (attachment 6). In particular, the lower forecast inflation rate used in this final decision means the resulting regulatory depreciation allowance (which nets out the inflation indexation on the opening RAB) is higher than proposed.
1. Table 5‑1 sets out our final decision on the annual regulatory depreciation allowance for TransGrid's 2014–18 period.

Table 5‑1 AER's final decision on TransGrid's depreciation allowance for the 2014–18 period ($ million, nominal)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | 2014–15 | 2015–16 | 2016–17 | 2017–18 | Total |
| Straight-line depreciation | 242.9 | 262.2 | 281.9 | 269.5 | 1056.5 |
| Less: inflation indexation on opening RAB | 144.6 | 148.5 | 153.5 | 156.5 | 603.2 |
| **Regulatory depreciation** | **98.3** | **113.6** | **128.4** | **113.0** | **453.3** |

Source: AER analysis.

## TransGrid’s revised proposal

1. TransGrid's revised proposal submitted a forecast regulatory depreciation allowance over the 2014–18 period of $423.8 million ($ nominal). TransGrid's methodology for determining its regulatory depreciation allowance is unchanged from its initial proposal. We accepted the approach in our draft decision. To calculate the depreciation allowance, TransGrid's revised proposal used:[[2]](#footnote-2)
* The straight-line depreciation method employed in the AER's post-tax revenue model (PTRM).
* The revised closing RAB value as at 30 June 2014 derived from the AER's roll forward model (RFM).
* The revised weighted average remaining asset lives of assets in existence as at 30 June 2014 derived from the RFM.
* The revised proposed forecast capex for the 2014–18 period.
* The standard asset lives accepted in the draft decision for depreciating new assets associated with forecast capex for the 2014–18 period.

TransGrid's revised proposal adopted our draft decision inflation forecast method used to index the RAB over the 2014–18 period.[[3]](#footnote-3)

Table 5‑2 sets out TransGrid's revised proposed depreciation allowance for the
2014–18 period.

Table 5‑2 TransGrid's revised proposed depreciation allowance for the 2014–18 period ($ million, nominal)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | 2014–15 | 2015–16 | 2016–17 | 2017–18 | Total |
| Straight-line depreciation | 243.2 | 264.3 | 287.3 | 277.7 | 1072.5 |
| Less: inflation indexation on opening RAB | 151.9 | 158.6 | 166.4 | 171.2 | 648.1 |
| **Regulatory depreciation** | **91.3** | **105.8** | **120.9** | **105.8** | **423.8** |

Source: TransGrid, Revised revenue proposal, January 2015, p. 127.

## AER’s assessment approach

We did not change our assessment approach for the regulatory depreciation allowance from our draft decision. Section 5.3 of our draft decision details that approach.

## Reasons for final decision

We accept TransGrid's proposed depreciation method set out in its revised proposal. However, we increased TransGrid's revised proposed forecast regulatory depreciation allowance by $29.5 million (or 7 per cent) to $453.3 million ($ nominal). Our amendment is driven by our:

* updates to the remaining asset lives (section 5.4.2)
* determinations on other components of TransGrid's revised proposal, such as the opening RAB value (attachment 2), forecast inflation (attachment 3), and forecast capex (attachment 6), which affect the forecast regulatory depreciation allowance. In particular, the use of a lower forecast inflation rate means that the resulting regulatory depreciation allowance (which nets out the inflation indexation on the opening RAB) is higher than proposed.

### Standard asset lives

Consistent with our draft decision, we accept TransGrid's proposed standard asset lives, which include the following changes to the standard asset lives for:

* 'Underground cables 2014–18' asset class (to 45 years from 50 years).
* 'Secondary systems 2014–18' asset class (to 15 years from 35 years).
* 'Communications 2014–18' asset class (to 10 years from 35 years).
* The new asset class 'Transmission line life extension' of 25 years.
1. We are satisfied these proposed standard asset lives reflect the nature of the assets over the economic lives of the asset classes.[[4]](#footnote-4)
2. We note that the Energy Markets Reform Forum's (EMRF) submission raised concerns with the scale of some of the standard asset class changes, in particular with the 'Secondary systems' asset classes.[[5]](#footnote-5) Consistent with our draft decision, we are satisfied that TransGrid's proposed standard asset lives are comparable with those approved in our recent transmission determinations for other TNSPs. In the case of the 'Secondary systems' asset class, we consider our decision is appropriate because the new assets allocated to this class comprise of modern digital electronic protection and control devices which have a shorter economic life than their electromechanical predecessors.
3. The EMRF raised a second concern relating to the introduction of the 'Transmission line life extension' asset class. It submitted that the residual (undepreciated) amount of the underlying transmission line assets, subject to life extension works, should be depreciated at the extended life.
4. We consider this a valid point. In reviewing TransGrid's proposed transmission line assets targeted for life extension, we note that the majority (11 out of 13) of the underlying transmission lines are fully depreciated.[[6]](#footnote-6) The other two underlying transmission lines are close to being depreciated. Therefore, revising the remaining asset lives for these two lines in the manner suggested by EMRF would not have a material impact on the depreciation calculations in this case.[[7]](#footnote-7) Given this, we have decided not to adjust the remaining asset lives for the undepreciated amounts associated with the two underlying transmission line assets.
5. Table 5‑3 sets out our final decision on TransGrid's standard asset lives as at 1 July 2014.

### Remaining asset lives

1. For this final decision, we have updated TransGrid's revised proposed remaining asset lives as at 1 July 2014.
2. In the draft decision, we accepted TransGrid's proposed weighted average method to calculate the remaining asset lives as at 1 July 2014. The proposed method is consistent with our preferred approach. We noted that the remaining asset lives would be updated for the final decision because TransGrid's revised proposal would include revisions for 2013–14 actual capex. This is because the 2013–14 capex values are used to calculate the weighted average remaining asset lives in the RFM. Based on the further change to the 2013–14 capex as discussed in attachment 2 we have updated the remaining asset lives as at 1 July 2014 for this final decision.
3. Table 5‑3 sets out our final decision on TransGrid's remaining asset lives as at 1 July 2014.

Table 5‑3 AER's final decision on TransGrid's standard and remaining asset lives as at 1 July 2014 (years)

| 1. Asset class
 | Standard asset life  | Remaining asset life as at 1 July 2014  |
| --- | --- | --- |
| Transmission lines (pre 2004-05) | n/a | 18.1 |
| Underground cables (pre 2004-05) | n/a | 30.3 |
| Substations including buildings (pre 2004-05) | n/a | 16.5 |
| SCADA and communications (pre 2004-05) | n/a | 1.8 |
| Non-network assets (pre 2004-05) | n/a | 1.0 |
| SMHEA assets (pre 2004-05) | n/a | 3.0 |
| Transmission lines (2004-09) | n/a | 44.1 |
| Underground cables (2004-09) | n/a | 36.4 |
| Substations including buildings (2004-09) | n/a | 33.8 |
| SCADA and communications (2004-09) | n/a | 8.8 |
| Non-network assets (2004-09) | n/a | 3.4 |
| Transmission lines & cables (2009-14) | n/a | 48.6 |
| Substations (2009-14) | n/a | 38.2 |
| Secondary systems (2009-14) | n/a | 33.5 |
| Communications (2009-14) | n/a | 33.4 |
| Business IT (2009-14) | n/a | 3.0 |
| Minor plant, motor vehicles & mobile plant (2009-14) | n/a | 6.2 |
| Equity raising costs (2009-14) | n/a | 36.6 |
| Transmission lines (2014-18) | 50.0 | n/a |
| Underground cables (2014-18) | 45.0 | n/a |
| Substations (2014-18) | 40.0 | n/a |
| Secondary systems (2014-18) | 15.0 | n/a |
| Communications (short life) (2014-18)a | 10.0 | n/a |
| Business IT (2014-18) | 4.0 | n/a |
| Minor plant, motor vehicles & mobile plant (2014-18) | 8.0 | n/a |
| Transmission line life extension (2014-18) | 25.0 | n/a |
| Equity raising costs (2014-18)b | n/a | n/a |
| Land and easements  | n/a | n/a |

Source: AER analysis.

n/a: Not applicable. The asset classes ending with '(pre 2004-05)'; '(2004-09)'; and '(2009-14)' do not have assigned standard asset lives because forecast capex is no longer allocated to them.

(a) As discussed in our draft decision attachment 5, we have changed the name of this asset class to 'Communications (short life) 2014–18' to better reflect the nature of the assets allocated to this asset class.

(b) For this final decision, TransGrid does not satisfy the requirements to incur benchmark equity raising costs associated with its forecast capex for the 2014–18 period. Therefore, a standard asset life for equity raising costs (2014–18) is not required.

1. NER, cl. 6A.5.4(a)(1) and (3). [↑](#footnote-ref-1)
2. TransGrid, Revised revenue proposal, pp. 126–127. [↑](#footnote-ref-2)
3. TransGrid, Revised revenue proposal, p. 127. [↑](#footnote-ref-3)
4. NER, cl. 6A.6.3(b)(1). [↑](#footnote-ref-4)
5. EMRF, AER draft decision and TransGrid revised proposal: A response by the Energy Markets Reform Forum, January 2015, p. 30. [↑](#footnote-ref-5)
6. TransGrid, Response to information request AER TransGrid Depreciation R1 – Life extension, 9 March 2015, pp. 1–2. [↑](#footnote-ref-6)
7. Further, there are practical implementation issues to consider for revising the remaining asset lives to the two underlying transmission line assets. This is because the RAB is categorised at an asset class level rather than an individual asset level. [↑](#footnote-ref-7)