

FINAL DECISION

CitiPower Distribution Determination 2021 to 2026

Attachment 1 Annual revenue requirement

April 2021



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Note

This attachment forms part of the Australian Energy Regulator's (AER) final decision on the distribution determination that will apply to CitiPower for the 2021–26 regulatory control period. It should be read with all other parts of the final decision.

The final decision includes the following attachments:

Overview

- Attachment 1 Annual revenue requirement
- Attachment 2 Regulatory asset 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 benefit sharing scheme
- Attachment 9 Capital expenditure sharing scheme
- Attachment 10 Service target performance incentive scheme
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1 Annual revenue requirement

This attachment sets out our final decision on CitiPower's annual revenue requirement (ARR) for the provision of standard control services (SCS) over the 2021–26 regulatory control period. Specifically, it sets out our final decision on:

- 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 CitiPower's ARRs using a building block approach. We determine the X factors by smoothing the ARRs over the regulatory control period. The X factor is used in the CPI–X methodology to determine the annual expected revenue (smoothed).

1.1 Final decision

We determine a total ARR of \$1487.0 million (\$ nominal, unsmoothed) for CitiPower for the 2021–26 regulatory control period, reflecting our final decision on the various building block costs. This is an increase of \$40.4 million (\$ nominal) or 2.8 per cent to CitiPower's revised proposed total ARR of \$1446.6 million.¹ The key reasons for the increase are the lower expected inflation rate that resulted from our inflation review which increases regulatory depreciation (Attachment 4).

We determine the annual expected revenue (smoothed) and X factor for each regulatory year of the 2021–26 regulatory control period by smoothing the ARRs. Our final decision is to approve total expected revenues of \$1485.8 million (\$ nominal) for CitiPower for the 2021–26 regulatory control period.

Table 1.1 shows our final decision on the ARR, annual expected revenue, and X factor for each year of the 2021–26 regulatory control period.

Table 1.1AER's final decision on CitiPower's revenues for the2021–26 regulatory control period (\$ million, nominal)

	2021–22	2022–23	2023–24	2024–25	2025–26	Total
Return on capital	93.1	92.2	91.0	89.0	86.2	451.6
Regulatory depreciation ^a	70.6	77.0	84.2	90.9	96.9	419.7
Operating expenditure ^b	96.8	97.5	101.9	103.5	106.6	506.2

¹ CitiPower, *Revised regulatory proposal MOD 10.02 – PTRM 2021–26*, updated 22 December 2020.

	2021–22	2022–23	2023–24	2024–25	2025–26	Total
Revenue adjustments ^c	19.4	16.2	11.5	10.8	15.2	73.2
Cost of corporate income tax	8.2	7.4	6.1	7.2	7.4	36.3
Annual revenue requirement (unsmoothed)	288.1	290.4	294.8	301.4	312.3	1487.0
Annual expected revenue (smoothed)	291.4	294.2	297.1	300.0	303.0	1485.8
X factor ^d	n/a ^e	1.00%	1.00%	1.00%	1.00%	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 from the efficiency benefit sharing scheme (EBSS), the capital expenditure sharing scheme (CESS), shared assets adjustments and the demand management innovation allowance mechanism (DMIAM).
- (d) The X factors will be revised 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) CitiPower is not required to apply an X factor for 2021–22 because we set the 2021–22 expected revenue in this decision. The expected revenue for 2021–22 is around 10.3 per cent lower than the approved total annual revenue for 2020 in real terms, or 8.5 per cent lower in nominal terms after taking into account the escalation by the half year Consumer Price Index (CPI) to allow comparison of the revenue from 1 July 2021 onwards.

1.2 CitiPower's revised proposal

CitiPower's revised proposal included total expected revenues (smoothed) of \$1446.2 million (\$ nominal) for the 2021–26 regulatory control period.

Table 1.2 sets out CitiPower's revised proposed ARR, the annual expected revenue, and the X factor for each year of the 2021–26 regulatory control period.

Table 1.2CitiPower's revised proposed revenues for the 2021–26regulatory control period (\$ million, nominal)

	2021–22	2022–23	2023–24	2024–25	2025–26	Total
Return on capital	90.9	91.6	91.5	90.6	88.9	453.6
Regulatory depreciation ^a	63.9	70.5	77.8	84.8	91.3	388.3
Operating expenditure ^b	97.1	98.2	103.1	105.0	108.5	511.9
Revenue adjustments ^c	18.6	15.4	10.7	10.0	14.5	69.1
Cost of corporate income tax	5.2	5.1	3.6	4.8	5.0	23.7
Annual revenue requirement (unsmoothed)	275.6	280.8	286.7	295.2	308.3	1446.6
Annual expected revenue (smoothed)	275.8	282.4	289.1	295.9	303.0	1446.2

	2021–22	2022–23	2023–24	2024–25	2025–26	Total
X factor	n/a ^d	0.00%	0.00%	0.00%	0.00%	n/a
Source:	CitiPower, Revised regulatory proposal MOD 1	10.02 – PTRN	<i>1 2021–26,</i> u	pdated 22 De	ecember 2020.	

- (a) Regulatory depreciation is straight-line depreciation net of the inflation indexation on the opening RAB.
- (b) This is the revised operating expenditure (opex) forecast (submitted on 22 December 2020). Includes debt raising costs.
- (c) Includes revenue adjustments from EBSS, CESS, shared assets adjustments and DMIAM.
- (d) CitiPower is not required to apply an X factor for 2021–22 because we set the 2021–22 expected revenue in this decision.

1.3 Assessment approach

We did not change our assessment approach for the ARR from our draft decision. Attachment 1 (section 1.3) of our draft decision details that approach.²

1.4 Reasons for final decision

For this final decision, we determine a total ARR of \$1487.0 million (\$ nominal, unsmoothed) for CitiPower for the 2021–26 regulatory control period. This is an increase of \$40.4 million (\$ nominal) or 2.8 per cent to CitiPower's revised proposed total ARR of \$1446.6 million (\$ nominal) for this period. This reflects the impact of our final decision on the various building block costs.

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

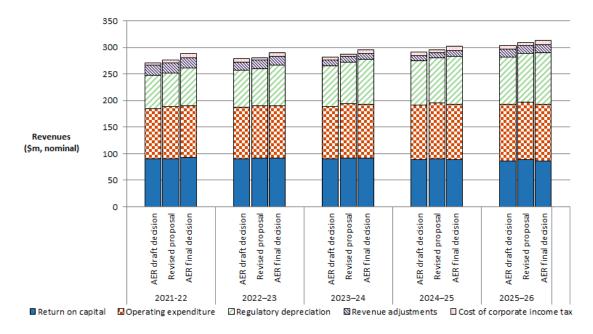
- a reduction in the return on capital of \$2.0 million or 0.4 per cent (Attachments 2, 3 and 5)
- an increase in the regulatory depreciation of \$31.4 million or 8.1 per cent (Attachment 4)
- a reduction in the opex forecast of \$5.7 million or 1.1 per cent (Attachment 6)³
- an increase in the cost of corporate income tax of \$12.6 million or 53.1 per cent (Attachment 7).
- an increase in the revenue adjustments of \$4.1 million or 6.0 per cent (section 1.4.2 and Attachments 8, 9 and 11).

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

² AER, Draft decision: CitiPower distribution determination 2021 to 2026, attachment 1– Annual revenue requirement, September 2020, pp. 6–7.

³ While we accept CitiPower's revised proposal opex in \$2020–21 terms, the lower inflation in the final decision results in a nominal reduction.

Figure 1.1 AER's draft and final decisions and CitiPower's revised proposed annual building block revenue requirement (\$ million, nominal)



- Source: AER analysis; CitiPower, *Revised regulatory proposal MOD 10.02 PTRM 2021–26*, updated 22 December 2020.
- Note: Revenue adjustments include EBSS, CESS, shared assets adjustments and DMIAM amounts. Opex includes debt raising costs.

1.4.1 X factor and annual expected revenue

For this final decision, we determine an X factor for CitiPower of 1.0 per cent per annum for the four years of the regulatory control period from 2022–23 to 2025–26.⁴ The net present value (NPV) of the ARRs is \$1304.1 million (\$ nominal) as at 1 July 2021. Based on this NPV and applying the CPI–X framework we determine that the expected revenue (smoothed) for CitiPower is \$291.4 million in 2021–22 increasing to \$303.0 million in 2025–26 (\$ nominal). The resulting total expected revenue for CitiPower is \$1485.8 million for the 2021–26 regulatory control period.

In our draft decision, we considered the 2020 total allowed revenue from CitiPower's approved pricing proposal, escalated by the half year CPI, should form the 2020–21 starting revenue estimate of \$318.4 million, as this was the latest available estimate that we have approved.⁵ CitiPower adopted this estimate in its revised proposal.⁶ This estimated 2020–21 starting revenue forms the base year to calculate the percentage

⁴ CitiPower is not required to apply an X factor for 2021–22 because we set the 2021–22 expected revenue in this decision.

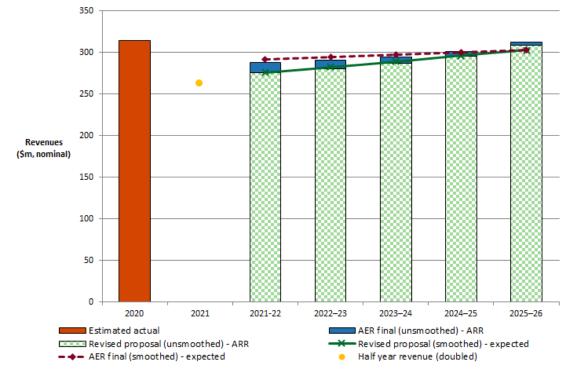
⁵ CitiPower, *Revised pricing proposal 2020*, 22 October 2019, p. 11.

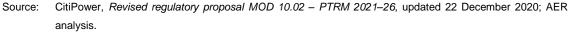
⁶ CitiPower, *Revised regulatory proposal MOD 10.02 – PTRM 2021–26*, updated 22 December 2020.

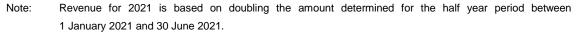
change for the first year of the 2021–26 regulatory control period (P_0) for our final decision.

Figure 1.2 shows our final decision on CitiPower's annual expected revenue (smoothed revenue) and the ARR (unsmoothed revenue) for the 2021–26 regulatory control period. For comparative purposes, the revenue for 2021 is shown as double the amount determined for the six month extension period between 1 January 2021 and 30 June 2021.⁷









In its revised proposal, CitiPower adopted X factors of zero per cent for years 2 to 5 of the regulatory control period which equates to zero real revenue change in those years.⁸ Our draft decision approach was to maximise real revenue decreases over years 2 to 5 while still maintaining a final year difference between smoothed and unsmoothed revenues within our preferred range of ± 3 per cent.⁹ CitiPower's revised proposal submitted its smoothing approach was based on its assessment of customer

⁷ AER, Model – Final decision six-month extension – CitiPower – 2021 HY Post-Tax Revenue Model, October 2020.

⁸ CitiPower, Revised regulatory proposal 2021–26, 03 December 2020, p. 62.

⁹ AER, Draft decision: CitiPower distribution determination 2021 to 2026, attachment 1 – Annual revenue requirement, September 2020, pp. 9–11.

and stakeholder feedback, the impact of forecast 2020 revenue under-recovery flowing into 2021–26 revenue, and aligning smoothed and unsmoothed revenue.¹⁰ We note CitiPower's assessment but we consider that the draft decision approach of maximising real revenue decreases for years 2 to 5 remains appropriate for this final decision. As discussed in Attachment 14, CitiPower's recovery of under-recovered 2020 distribution revenue will be applied across years 2 to 5 of the regulatory control period as part of the annual pricing process and the year 1 revenue will not be impacted. We consider setting X factors which maximise the real decreases for years 2 to 5 for this final decision will help offset the impact of these annual pricing process adjustments. Similarly, we consider that our approach would better absorb the impact of revenue increases arising from adjustments such as cost pass throughs which could occur during the 2021–26 regulatory control period. We have therefore maintained our draft decision approach to revenue smoothing for this final decision.

Red Energy and Lumo Energy submitted that the revenues should remain stable to the extent possible in order to provide customers with stable tariffs in the long run.¹¹ We have considered the submission and taken into account the building block costs determined in this final decision when smoothing the expected revenues for CitiPower over the 2021–26 regulatory control period. In doing so, we have set the expected revenue for the first regulatory year at \$291.4 million (\$ nominal) which is \$3.3 million higher than the ARR for that year. We then apply an expected inflation rate of 2.0 per cent per annum and an X factor of 1.0 per cent per annum to determine the expected revenue in subsequent years.¹² We consider that our profile of X factors results in an expected revenue in the last year of the regulatory control period that is as close as reasonably possible to the ARR for that year.¹³ This approach is consistent with our draft decision.¹⁴

Our final decision results in an average decrease of 1.0 per cent per annum (\$ nominal) in the expected (smoothed) revenue from 2020–21 to the end of the 2021–26 regulatory control period.¹⁵ This consists of an initial decrease of 8.5 per cent from 2020–21 to 2021–22, followed by average annual increases of 1.0 per cent during the remainder of the 2021–26 regulatory control period.¹⁶ Our final decision also results

¹⁰ CitiPower, *Revised regulatory proposal 2021–26*, 03 December 2020, p. 62.

¹¹ Red Energy and Lumo Energy, Submission on the Victorian EDPR Revised Proposal and draft decision, 17 January 2021, p. 1.

¹² NER, cl. 6.5.9(a).

¹³ NER, cl. 6.5.9(b)(2). We consider a divergence of up to 3 per cent between the expected revenue and ARR for the last year of the regulatory control period is appropriate, if this can achieve smoother price changes for users over the regulatory control period. In the present circumstances, based on the X factors we have determined for CitiPower, this divergence is around 3.0 per cent.

¹⁴ AER, Draft decision: CitiPower distribution determination 2021 to 2026, attachment 1 – Annual revenue requirement, September 2020, pp. 9–11.

¹⁵ In real 2020–21 dollar terms, our approved expected revenue for CitiPower results in an average decrease of 2.9 per cent per annum over the 2021–26 regulatory control period.

¹⁶ In real 2020–21 dollar terms, this consists of an initial decrease of 10.3 per cent from 2020–21 to 2021–22, followed by annual average decreases of 1.0 per cent during the remainder of the 2021–26 regulatory control period.

in a decrease of 7.8 per cent in real terms (\$2020–21) to CitiPower's total ARR relative to that in the 2016–20 regulatory control period. This is largely due to a lower rate of return (and therefore lower return on capital) and a lower cost of corporate income tax in this final decision for the 2021–26 regulatory control period than that approved in the 2016–20 determination.

Figure 1.3 compares our final decision building blocks for CitiPower's 2021–26 regulatory control period with CitiPower's revised proposed revenue requirement for the same period, and the approved revenue for the 2016–20 regulatory control period.

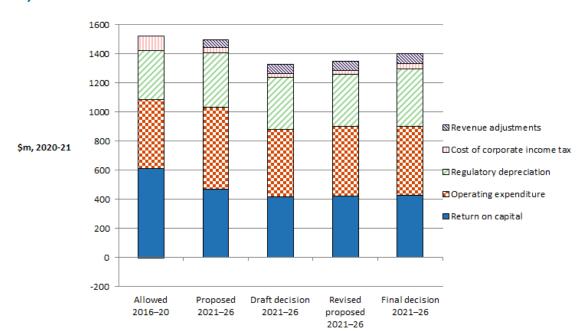


Figure 1.3 Total revenue by building block components (\$ million, 2020–21)

Source: CitiPower, *MOD 10.02 - PTRM 2021–26*, updated 1 June 2020; CitiPower, *Revised regulatory proposal MOD 10.02 – PTRM 2021–26*, updated 22 December 2020; AER analysis.

1.4.2 Shared assets

Our final decision is to apply a shared asset revenue adjustment to CitiPower's total expected revenue for the 2021–26 regulatory control period.

In our draft decision, we applied a shared asset revenue adjustment to CitiPower's revenues.¹⁷ CitiPower's revised proposal adopted our draft decision approach.¹⁸

Consistent with the draft decision, we confirm our assessment that CitiPower's forecast unregulated revenues from shared assets for the 2021–26 regulatory control period are

¹⁷ AER, Draft decision: CitiPower distribution determination 2021 to 2026, attachment 1 – Annual revenue requirement, September 2020, pp. 12–13.

¹⁸ CitiPower, *Revised regulatory proposal 2021–26*, 03 December 2020, p. 61.

reasonable. Therefore, our final decision will see \$1.5 million (\$2020–21) shared with customers across the 2021–26 regulatory control period, using the same assessment approach as the draft decision.

Table 1.3 compares the shared asset revenue adjustments of CitiPower's revised proposal and our final decision.

Table 1.3AER's final decision on CitiPower's shared asset revenueadjustment (\$ million, 2020–21)

	2021–22	2022–23	2023–24	2024–25	2025–26	Total
CitiPower's revised proposal	-0.3	-0.3	-0.3	-0.3	-0.3	-1.5
AER's final decision	-0.3	-0.3	-0.3	-0.3	-0.3	-1.5

Source: CitiPower, CP RRP MOD 10.02 – PTRM 2021–26, updated 22 December 2020; AER analysis.

1.4.3 Indicative average distribution price impact

Our final decision on CitiPower's expected revenues ultimately affects the prices customers pay for electricity. There are several steps required in translating our revenue decision into indicative distribution price impact.

We regulate CitiPower's SCS under a revenue cap form of control. This means our final decision on CitiPower's expected revenues does not directly translate to price impacts. This is because CitiPower'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 customers. We are not required to establish the distribution prices for CitiPower as part of this determination. However, we will assess CitiPower's annual pricing proposals before the commencement of each regulatory year within the 2021–26 regulatory control period. In each assessment we will administer the pricing requirements set in this distribution determination.

For this final decision, we have estimated some indicative average distribution price impacts flowing from our final determination on the expected revenues for CitiPower over the 2021–26 regulatory control period. In this section, our estimates only relate to SCS (that is, the core electricity distribution charges), not alternative control services (such as metering charges). These indicative price impacts assume that actual energy consumption across the 2021–26 regulatory control period matches CitiPower's forecast energy consumption, which we have adopted for this final decision. 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 to come up with the total allowed revenue.

Figure 1.4 shows CitiPower's indicative average price path over the period 2016 to 2025–26 in real 2020–21 dollar terms based on the expected revenues established in our final decision compared to CitiPower's revised proposed revenue requirement.

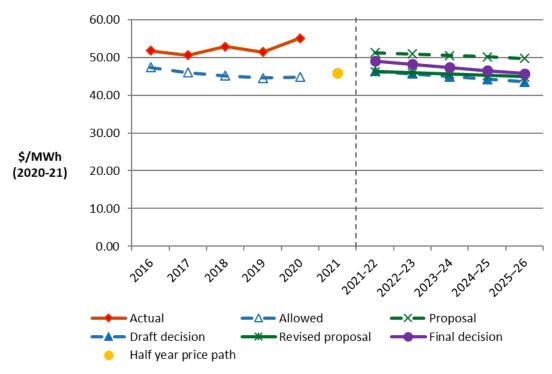


Figure 1.4 Indicative price path for CitiPower (\$/MWh, 2020–21)

Source: AER analysis.

Note: The price for 2021 is based on the revenue and energy throughput estimates for the half year period between 1 January 2021 and 30 June 2021.

We estimate that our final decision on CitiPower's annual expected revenue will result in a decrease to average distribution charges by about 3.6 per cent per annum over the 2021–26 regulatory control period in real 2020–21 dollar terms.¹⁹ This compares to the real average decrease of approximately 4.0 per cent per annum in CitiPower's revised proposal for the 2021–26 regulatory control period.²⁰ 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 1.4 compares the revenue and price impacts of CitiPower's revised proposal and our final decision.

¹⁹ In nominal terms we estimate average distribution charges to decrease by 1.7 per cent per annum. This amount reflects an expected inflation rate of 2.0 per cent per annum as determined in this final decision.

²⁰ In nominal terms CitiPower's revised proposal would decrease distribution charges by 1.7 per cent per annum. This amount reflects an expected inflation rate of 2.37 per cent per annum as proposed by CitiPower in its revised proposal.

Table 1.4Comparison of revenue and price impacts of CitiPower'srevised proposal and the AER's final decision (\$ nominal)

	2020 ^b	2021–22	2022–23	2023–24	2024–25	2025–26
AER final decision						
Revenue (\$ million)	318.4	291.4	294.2	297.1	300.0	303.0
Price path (\$/MWh) ^a	55.04	50.03	50.14	50.26	50.37	50.49
Revenue (change)		-8.5%	1.0%	1.0%	1.0%	1.0%
Price path (change)		-9.1%	0.2%	0.2%	0.2%	0.2%
CitiPower revised proposal						
Revenue (\$ million)	318.4	275.8	282.4	289.1	295.9	303.0
Price path (\$/MWh) ^a	55.04	47.36	48.12	48.90	49.68	50.49
Revenue (change)		-13.4%	2.4%	2.4%	2.4%	2.4%
Price path (change)		-14.0%	1.6%	1.6%	1.6%	1.6%

Source: CitiPower, *Revised regulatory proposal MOD 10.02 – PTRM 2021–26*, updated 22 December 2020; AER analysis.

(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 regulatory control period.

(b) This is based on CitiPower's 2020 approved pricing proposal, and has been indexed by the CPI for the half year period from 1 January 2021 to 30 June 2021 to allow comparison of the price path from 1 July 2021 onwards.

1.4.4 Expected impact of decision on electricity bills

The annual electricity bill for customers in CitiPower's network reflects the combined costs of all the electricity supply chain components—wholesale energy generation, transmission, distribution, metering, and retail costs. This final decision primarily relates to the distribution charges for SCS, which represent approximately 20.5 per cent on average for residential customers' and 24.6 per cent on average for small business customers' annual electricity bills in CitiPower's network area.²¹

We estimate the expected bill impact by varying the distribution charges in accordance with our final decision, while holding all other components—including the metering component—constant.²² This approach isolates the effect of our final decision on the

²¹ Essential Services Commission, Victorian Default Offer to apply from 1 January 2020 – Final decision, 18 November 2019, p. 76; CitiPower, 2020 Pricing Proposal, 22 October 2019, p. 5.

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 to come up with the total allowed revenue.

core distribution charges only. However, this does not imply that other components will remain unchanged across the regulatory control period.²³

Based on this approach, we expect that our final decision on the distribution component will decrease the average annual residential electricity bill in 2025–26 by about \$24 (\$ nominal) or 1.7 per cent from the 2020 total bill level.

Similarly, for an average small business customer, we expect that our final decision on the distribution component will decrease the average annual residential electricity bill in 2025–26 by about \$120 (\$ nominal) or 2.0 per cent from the 2020 total bill level.

Our estimated impact is based on an average annual electricity usage of around 4,000 kWh per annum for residential households and 20,000 kWh for small businesses.²⁴ 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.

Table 1.5 shows our estimated impact of our final decision and CitiPower's revised proposal on the average annual electricity bills for residential and small business customers in its network over the 2021–26 regulatory control period.

	2020	2021–22	2022–23	2023–24	2024–25	2025–26
AER final decision						
Residential annual bill	1437ª	1411	1411	1412	1412	1413
Annual change ^c		-27 (-1.9%)	1 (0.0%)	1 (0.0%)	1 (0.0%)	1 (0.0%)
Small business annual bill	5894 ^b	5762	5765	5768	5771	5774
Annual change ^c		-132 (-2.2%)	3 (0.1%)	3 (0.1%)	3 (0.1%)	3 (0.1%)
CitiPower revised proposal						
Residential annual bill	1437ª	1396	1400	1404	1409	1413
Annual change ^c		-41 (-2.9%)	4 (0.3%)	4 (0.3%)	4 (0.3%)	4 (0.3%)
Small business annual bill	5894 ^b	5692	5712	5732	5753	5774
Annual change ^c		-202 (-3.4%)	20 (0.4%)	20 (0.4%)	21 (0.4%)	21 (0.4%)

Table 1.5Estimated impact of CitiPower's revised proposal and AER'sfinal decision on annual electricity bills for the 2021–26 regulatory controlperiod (\$ nominal)

²³ It also assumes that actual energy consumption will equal the forecast adopted in our final decision. Since CitiPower operates under a revenue cap, changes in energy consumption will also affect annual electricity bills across the 2021–26 regulatory control period.

 ²⁴ Essential Services Commission, Victorian Default Offer to apply from 1 January 2020 – Final decision, 18 November 2019, pp. 72–73.

- Source: AER analysis; Essential Services Commission, Victorian Default Offer to apply from 1 January 2020 Final decision, 18 November 2019, p. 76.
- (a) Annual bill for 2020 is sourced from Essential Services Commission, Victorian Default Offer to apply from 1 January 2020 – Final decision and reflects the average consumption of 4000 kWh for residential customers in Victoria. This is then indexed by the CPI for the half year period from 1 January 2021 to 30 June 2021 to allow comparison of the bill impact from 1 July 2021 onwards.
- (b) Annual bill for 2020 is sourced from Essential Services Commission, Victorian Default Offer to apply from 1 January 2020 – Final decision and reflects the average consumption of 20,000 kWh for small business customers in Victoria. This is then indexed by the CPI for the half year period from 1 January 2021 to 30 June 2021 to allow comparison of the bill impact from 1 July 2021 onwards.
- (c) Annual change amounts and percentages are indicative. They are derived by varying the distribution component of the 2020 bill amounts in proportion to yearly expected revenue divided by forecast energy as provided by CitiPower. Actual bill impacts will vary depending on electricity consumption and tariff class.

Shortened forms

Shortened form	Extended form
\$/MWh	dollars per megawatt hour
AER	Australian Energy Regulator
ARR	annual revenue requirement
CESS	capital expenditure sharing scheme
CPI	consumer price index
DMIAM	demand management innovation allowance mechanism
EBSS	efficiency benefit sharing scheme
kWH	kilowatt hour
NER	National Electricity Rules
NPV	net present value
opex	operating expenditure
PTRM	post-tax revenue model
RAB	regulatory asset base
SCS	standard control services