PRELIMINARY DECISION
Jemena distribution determination 2016 to 2020

Attachment 2 – Regulatory asset base

October 2015

AUSTRALIAN ENERGY REGULATOR

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

Note

This attachment forms part of the AER's preliminary decision on Jemena's revenue proposal 2016–20. It should be read with all other parts of the preliminary decision.

The preliminary decision includes the following documents:

Overview

Attachment 1 - Annual revenue requirement

Attachment 2 - Regulatory asset base

Attachment 3 - Rate of return

Attachment 4 - Value of imputation credits

Attachment 5 - Regulatory depreciation

Attachment 6 - Capital expenditure

Attachment 7 - Operating expenditure

Attachment 8 - Corporate income tax

Attachment 9 - Efficiency benefit sharing scheme

Attachment 10 - Capital expenditure sharing scheme

Attachment 11 - Service target performance incentive scheme

Attachment 12 - Demand management incentive scheme

Attachment 13 - Classification of services

Attachment 14 - Control mechanism

Attachment 15 - Pass through events

Attachment 16 - Alternative control services

Attachment 17 - Negotiated services framework and criteria

Attachment 18 - f-factor scheme

Contents

Shortened forms

Shortened form	Extended form
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
AMI	Advanced metering infrastructure
augex	augmentation expenditure
capex	capital expenditure
CCP	Consumer Challenge Panel
CESS	capital expenditure sharing scheme
CPI	consumer price index
DRP	debt risk premium
DMIA	demand management innovation allowance
DMIS	demand management incentive scheme
distributor	distribution network service provider
DUoS	distribution use of system
EBSS	efficiency benefit sharing scheme
ERP	equity risk premium
Expenditure Assessment Guideline	Expenditure Forecast Assessment Guideline for electricity distribution
F&A	framework and approach
MRP	market risk premium
NEL	national electricity law
NEM	national electricity market
NEO	national electricity objective
NER	national electricity rules
NSP	network service provider
opex	operating expenditure
PPI	partial performance indicators
PTRM	post-tax revenue model
RAB	regulatory asset base
RBA	Reserve Bank of Australia
repex	replacement expenditure

Shortened form	Extended form
RFM	roll forward model
RIN	regulatory information notice
RPP	revenue and pricing principles
SAIDI	system average interruption duration index
SAIFI	system average interruption frequency index
SLCAPM	Sharpe-Lintner capital asset pricing model
STPIS	service target performance incentive scheme
WACC	weighted average cost of capital

2 Regulatory asset base

We are required to make a decision on Jemena's opening regulatory asset base (RAB) as at 1 January 2016.[1] We use the RAB at the start of each regulatory year to determine the return of capital (regulatory depreciation) and return on capital building block allowances. This attachment presents our preliminary decision on the opening RAB value as at 1 January 2016 for Jemena and roll forward of the forecast RAB over the 2016–20 regulatory control period.

2.1 Preliminary decision

We do not accept Jemena's proposed opening RAB of $1190.8 million ($ nominal) as at 1 January 2016.[2] We instead determine an opening RAB value of $1187.0 million ($ nominal) as at 1 January 2016. This is because we have amended Jemena's proposed roll forward model (RFM) to correct a number of input errors. These amendments include:

- correcting the annual actual inflation rates for RAB indexation
- removing the half-year WACC allowance for 2010 actual net capex
- correcting the adjustments to account for the difference between 2005 actual and forecast net capex
- removing capitalised finance charges from proposed 2011 actual capex.

These amendments resulted in a net reduction to the opening RAB as at 1 January 2016 of $3.8 million (or 0.3 per cent) compared to that proposed.

To determine the opening RAB as at 1 January 2016, we have rolled forward the RAB over the 2011–15 regulatory control period to determine a closing RAB value at 31 December 2015. This roll forward includes an adjustment at the end of the 2011–15 regulatory control period to account for the difference between actual 2010 capex and the estimate approved at the 2011–15 determination.[3]

Table 2.1 sets out our preliminary decision on the roll forward of the RAB values for the 2011–15 regulatory control period.

---

1 NER, cl. 6.12.1(6).

2 Jemena, *Regulatory proposal*, April 2015, p. 53, Table 6-7.

3 The end of period adjustment will be positive (negative) if actual capex is higher (lower) than the estimate approved at the 2011–15 determination.

Table 2.1 AER's preliminary decision on Jemena's RAB for the 2011–15 regulatory control period ($million, nominal)

	2011	2012	2013	2014	2015[a]
Opening RAB	764.2	867.3	947.0	1026.9	1110.7
Capital expenditure[b]	122.4	116.3	122.0	128.8	144.1
Inflation indexation on opening RAB	26.9	17.4	20.5	23.7	25.6
Less: straight-line depreciation	46.2	54.0	62.5	68.6	71.8
Closing RAB	867.3	947.0	1026.9	1110.7	1208.7
Difference between estimated and actual 2010 capex (1 January 2010 to 31 December 2010)					–13.3
Return on difference for 2010 capex					–8.3
Closing RAB as at 31 December 2015					**1187.0**

Source: AER analysis.

(a): Based on estimated capex. We will update the RAB roll forward in the substitute decision.

(b): Net of disposals and capital contributions, and adjusted for CPI.

We determine a forecast closing RAB value at 31 December 2020 of $1684.0 million ($ nominal). This is $46.4 million (or 2.7 per cent) lower than the amount of $1730.4 million ($ nominal) proposed by Jemena. Our preliminary decision on the forecast closing RAB reflects the amended opening RAB as at 1 January 2016, and our preliminary decisions on forecast capex (attachment 6), forecast regulatory depreciation (attachment 5), and forecast inflation (attachment 3).

Table 2.2 sets out our preliminary decision on the forecast RAB values for Jemena over the 2016–20 regulatory control period.

Table 2.2 AER's preliminary decision on Jemena's RAB for the 2016–20 regulatory control period ($ million, nominal)

	2016	2017	2018	2019	2020
Opening RAB	1187.0	1270.1	1380.2	1482.8	1591.1
Capital expenditure[a]	136.1	151.5	145.6	155.7	145.9
Inflation indexation on opening RAB	29.7	31.8	34.5	37.1	39.8
Less: straight-line depreciation	82.7	73.1	77.5	84.5	92.7
Closing RAB	1270.1	1380.2	1482.8	1591.1	1684.0

Source: AER analysis.

(a): Net of forecast disposals and capital contributions.

We determine that the forecast depreciation approach is to be used to establish the opening RAB at the commencement of the 2021–25 regulatory control period for Jemena.[4]

2.2 Jemena's proposal

Jemena used our RFM to establish an opening RAB as at 1 January 2016 and our PTRM to roll forward the RAB over the 2016–20 regulatory control period.

Jemena proposed an opening RAB value as at 1 January 2011 of $764.2 million ($ nominal).[5] Rolling forward this RAB and using depreciation based on actual capex, Jemena proposed a closing RAB as at 31 December 2015 of $1190.8 million ($ nominal). Table 2.3 presents Jemena's proposed roll forward of its RAB during the 2011–15 regulatory control period.

Table 2.3 Jemena's proposed RAB for the 2011–15 regulatory control period ($million, nominal)

	2011	2012	2013	2014	2015[a]
Opening RAB	764.2	861.3	951.9	1027.2	1106.3
Capital expenditure[b]	124.8	117.2	121.9	126.7	144.1
Inflation indexation on opening RAB	21.3	30.3	19.1	22.2	25.5
Less: straight-line depreciation	49.0	57.0	65.6	71.8	74.8
Closing RAB	861.3	951.9	1027.2	1106.3	1201.1
Difference between estimated and actual 2010 capex (1 January 2010 to 31 December 2010)					–6.3
Return on difference for 2010 capex					–4.0
Closing RAB as at 31 December 2015					**1190.8**

Source: Jemena, *Regulatory proposal*, April 2015, Attachment 06.03.

(a) Based on estimated capex.

(b) Net of disposals and capital contributions, and adjusted for CPI.

Jemena proposed a closing forecast RAB as at 31 December 2020 of $1730.4 million ($ nominal). This value reflects its proposed opening RAB, forecast capex, forecast inflation, and depreciation (based on forecast capex) over the 2016–20 regulatory control period. Its projected RAB over the 2016–20 regulatory control period is shown in Table 2.4.

[4] NER, cl. 6.12.1(18).

[5] Jemena, *Regulatory proposal*, April 2015, Attachment 06.03.

Table 2.4 Jemena's proposed RAB for the 2016–20 regulatory control period ($million, nominal)

	2016	2017	2018	2019	2020
Opening RAB	1190.8	1288.0	1405.6	1518.3	1634.9
Capital expenditure[a]	141.3	169.7	164.9	160.0	146.9
Inflation indexation on opening RAB	30.1	32.5	35.5	38.3	41.3
Less: straight-line depreciation	74.2	84.7	87.6	81.7	92.6
Closing RAB	1288.0	1405.6	1518.3	1634.9	1730.4

Source: Jemena, *Regulatory proposal*, April 2015, Attachment 06.01.

(a) Net of disposals and capital contributions.

Jemena did not propose a depreciation approach to establish the opening RAB at the commencement of the 2021–25 regulatory control period.

2.3 AER's assessment approach

We are required to roll forward the service provider's RAB during the 2011–15 regulatory control period to establish the opening RAB at 1 January 2016. This value can be adjusted for any differences in the forecast and actual capex, disposals and capital contributions. It may also be adjusted to reflect any changes in the use of the assets, with only assets used in the provision of standard control services to be included in the RAB.[6]

To determine the opening RAB, we developed an asset base RFM in accordance with the requirements of the NER[7] a service provider must use the RFM in preparing its regulatory proposal.[8] The RFM rolls forward the RAB from the beginning of the final year of the 2006–10 regulatory control period, through the 2011–15 regulatory control period, to the beginning of the next period.[9] The roll forward occurs for each year by:

- Adding an inflation (indexation) adjustment to the opening RAB for the relevant year. This adjustment must be consistent with the inflation factor used in the control mechanism.[10]
- Adding capex to the RAB for the relevant year.[11] In future determinations, the NER allows us to review a service provider's past capex and exclude inefficient past capex from being rolled into the RAB where total capex exceeds the regulatory

6 NER, cl. S6.2.1.
7 NER, cl. 6.5.1.
8 NER, cl. S6.1.3(7).
9 NEL, s. 7A(4).
10 NER, cl. 6.5.1(e)(3).
11 NER, cl. S6.2.1(e)(4).

allowance.[12] The details of our assessment approach for inefficient capex are set out in the *Capital expenditure incentive guideline*.[13] We note that under the transitional rules, the review of past capex does not apply to Jemena prior to 1 January 2016.[14] Therefore, for the purposes of this preliminary decision, we will add Jemena's actual or estimated capex in the 2011–15 regulatory control period to the RAB. We check actual capex amounts against audited annual reporting RIN data and generally accept the capex reported in those RINs in rolling forward the RAB. However, there may be instances where adjustments are required to the annual reporting RIN data. This would include where it is not fit for purpose.

- Subtracting depreciation from the RAB for the relevant year, calculated in accordance with the relevant distribution determination for that year.[15] Depreciation based on forecast or actual capex can be used to roll forward the RAB.[16] By default the RFM applies the depreciation approach based on actual capex, although this can be modified to apply a depreciation approach based on forecast capex when necessary. For this preliminary decision, we use depreciation based on actual capex for rolling forward Jemena's RAB values over the 2011–15 regulatory control period.[17] However, depreciation based on forecast capex will be used for the 2016–20 regulatory control period at the next reset.[18]
- Subtracting any disposals from the RAB for the relevant year.[19] We check these amounts against audited annual reporting RIN data.

These annual adjustments give the closing RAB for any particular year, which then becomes the opening RAB for the following year. Through this process the RFM rolls forward the RAB to the end of the 2011–15 regulatory control period. The PTRM used to calculate the annual revenue requirement for the 2016–20 regulatory control period generally adopts the same RAB roll forward approach as the RFM, although the annual adjustments to the RAB are based on forecasts, rather than actual amounts.

We are required to decide whether depreciation for establishing the service provider's RAB as at the commencement of the 2021–25 regulatory control period is to be based on actual or forecast capex.[20]

---

12 NER, cl. S6.2.2A.

13 AER, *Capital expenditure incentive guideline*, November 2013, pp. 12–20.
Under the NER, cl S6.2.2A(b), the exclusion of inefficient capex could only come from three areas including overspend in capex , margin paid to third party and capitalisation of opex as defined in cll. S6.2.2A (c), (d) and (e) of the NER.

14 NER, cls. 11.60.5 and 11.62.

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

16 NER, cl. 6.12.1(18).

17 The use of actual depreciation is consistent with the depreciation approach established in the 2010 distribution determination for Jemena. See: AER, *Victorian distribution determination final decision 2011–2015*, October 2010, p. 462.

18 Refer to section 2.4.3 for the reasons.

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

20 NER, cl. S6.2.2B.

The opening RAB for the 2021–25 regulatory control period can be determined using depreciation based either on forecast or actual capex incurred during the 2016–20 period. To roll forward the RAB using depreciation based on forecast capex, we would use the forecast depreciation contained in the PTRM for the 2016–20 regulatory control period, adjusted for actual inflation. If the approach to roll forward the RAB using depreciation based on actual capex was adopted, we would recalculate the depreciation based on actual capex incurred during the 2016–20 regulatory control period.

Our decision on whether to use actual or forecast depreciation must be consistent with the capex incentive objective. We must have regard to:[21]

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

2.3.1 Interrelationships

The RAB is an input into the determination of the return on capital and depreciation (return of capital) building block allowances.[22] Factors that influence the RAB will therefore flow through to these building block components and the annual revenue requirement. Other things being equal, a higher RAB increases both the return on capital and depreciation allowances.

The RAB is determined by various factors, including:

- the opening RAB (meaning the value of existing assets at the beginning of the regulatory control period)
- net capex[23]
- depreciation
- indexation adjustment – so the RAB is presented in nominal terms, consistent with the rate of return.

---

21 NER, cl. S6.2.2B(c).

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

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

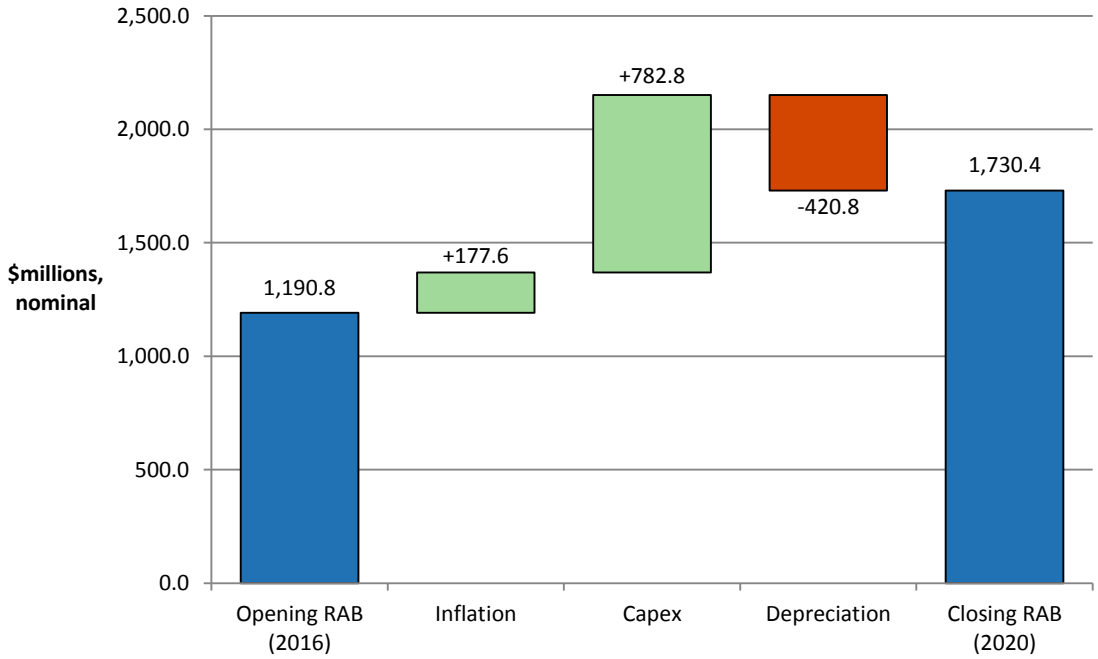
The opening RAB depends on the value of existing assets and will depend on actual net capex, actual inflation outcomes and depreciation in the past.

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

Depreciation reduces the RAB. The depreciation allowance depends on the size of the opening RAB and the forecast net capex. By convention, the indexation adjustment is also offset against depreciation to prevent double counting of inflation in the RAB and rate of return, which are both presented in nominal terms. This reduces the apparent depreciation building block that feeds into the annual revenue requirement.

Figure 2.1 shows the key drivers of the change in the RAB over the 2016–20 regulatory control period as proposed by Jemena. Overall, the closing RAB at the end of the 2016–20 regulatory control period would be 45 per cent higher than the opening RAB at the start of that period based on the proposal, in nominal terms. The proposed forecast net capex increases the RAB by about 65 per cent, while inflation increases it by about 15 per cent. Forecast depreciation, on the other hand, reduces the RAB by about 35 per cent.

Figure 2.1 Key drivers of changes in the RAB ($ million, nominal)



Source: Jemena, *Regulatory proposal*, April 2015, Attachment 06.01.

Maintaining the RAB in real terms by adding inflation is required by the NER[24] and generally helps to promote smoother prices over the life of an asset. If the RAB was unindexed for inflation, the offsetting indexation adjustment applied to depreciation would also have to be removed. On balance, this means more depreciation would be returned to the business resulting in higher prices early in an asset life and lower prices later in its life.[25]

The RAB would rise in real terms over the 2016–20 regulatory control period based on Jemena's proposal. The depreciation amount is indicative as it largely depends on the opening RAB (which in turn depends on capex). However, we consider the size of the forecast net capex to be a significant issue. Figure 2.1 shows forecast net capex is the largest driver of the increase in the RAB and we have considered whether it is appropriate that the forecast net capex exceeds depreciation as Jemena has proposed. Refer to attachment 6 for the discussion on forecast capex.

A ten per cent increase in the opening RAB causes revenues to increase by about 5.1 per cent. However, the impact on revenues of the annual change in RAB depends on the source of the RAB change, as some drivers affect more than one building block cost.[26]

2.4 Reasons for preliminary decision

We determine an opening RAB value for Jemena of $1187.0 million ($ nominal) as at 1 January 2016, a decrease of $3.8 million ($ nominal) or 0.3 per cent from the proposed value. We forecast a closing RAB value of $1684.0 million by 31 December 2020. This represents a reduction of $46.4 million, or 2.7 per cent compared to the proposal. The reasons for our decision are discussed below.

2.4.1 Opening RAB as at 1 January 2016

To determine the opening RAB as at 1 January 2016 we have rolled forward the RAB over the 2011–15 regulatory control period to determine a closing RAB value as at 31 December 2015. In doing so we reviewed the key inputs of Jemena's proposed RFM, such as asset lives, gross capex values, asset disposals, capital contributions and rate of return. We found these were correct and they reconcile with relevant data sources such as annual reporting RIN data and the 2011–15 decision models.[27] However, we consider there should be adjustments made to Jemena's proposed RFM inputs for actual inflation and previous period rate of return. We also consider

---

[24] NER, cl. 6.5.1(e)(3).

[25] Such an impact would also be reflected if we were to switch methods midway through an asset's life.

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

[27] At the time of this preliminary decision, the roll forward of Jemena's RAB includes estimated capex values for 2015. We will update the 2015 estimated capex values for the final decision.

Jemena's proposed adjustments for the previous period capex and inclusion of capitalised finance charges for 2011 should be removed. These adjustments are discussed below.

Actual inflation inputs

Jemena did not apply the established approach for recording actual CPI inflation rates in its proposed RFM. Our approach to RAB indexation in the template RFM is to apply a one year lagged inflation rate to net capex and straight-line depreciation consistent with the method of indexation used in the control mechanism.[28] The actual CPI rate for each year is used to index the opening RAB in the RFM. In order to do this, the RFM requires each actual CPI rate measured for a year to be recorded in that specific year (un-lagged).[29] These actual observations are converted as part of coding within the RFM into a one year lagged index for use in the RAB roll forward process. This approach is consistent with the current RFM template developed in accordance with the NER and applied for other service providers.[30]

Jemena's proposed RFM contained actual inflation inputs that were already one year lagged observations. Jemena amended the coding in the RFM to account for its one year lagged CPI rate inputs. However, we do not consider it appropriate for Jemena to change the method set out in the template RFM. Our preliminary decision is to apply our standard approach to RAB indexation, consistent with the template RFM. As such, we have replaced Jemena's one year lagged CPI observations so that they are recorded in the year related to their measure and removed Jemena's coding changes to the indexation formula. We have adopted Jemena's use of an estimate of CPI for 2015, as the actual inflation is not yet known. Our final decision will update this estimate for actual 2015 inflation.

Previous period rate of return input

Jemena's proposed RFM includes a half-year WACC allowance for its 2010 actual net capex inputs. We do not consider that a half-year WACC allowance should be applied to 2010 capex. This assessment is consistent with the approach applied to 2010 capex in the revenue modelling by the Essential Services Commission for the 2006–10 regulatory control period.[31] Our preliminary decision is to remove the half-year WACC allowance by setting the 2010 nominal (fixed real time varying) WACC cell to zero in the RFM.[32] This is consistent with the approach adopted by other Victorian distributors in their proposals—CitiPower, Powercor and United Energy.

---

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

29 AER, *Victorian distribution determination final decision 2011-2015*, 29 October 2010, p. 57. For Jemena, the September quarter CPI is used as a proxy for the calendar year in the 2011–15 regulatory control period. As discussed in attachment 14, the June quarter CPI will be used as a proxy for the calendar year for the 2016–20 regulatory control period.

30 NER, cl. 6.5.1(b)–(d). Model published at: http://www.aer.gov.au/node/6908.

31 Essential Services Commission, *Electricity Distribution Price Review 2006-10*, October 2006, p. 252.

32 Cell G184 in the 'Input' sheet of the RFM.

Adjustment for previous period capex

Our 2011–15 determination made an adjustment to account for the difference between 2005 actual and forecast net capex when establishing the opening RAB at 1 January 2011. Jemena proposed an alteration in the RFM to account for the difference between 2005 actual and forecast net capex as allowed in the 2011–15 determination. In making these amendments the proposed RFM no longer calculate the depreciation of the RAB correctly. We consider that the RFM does not require the alteration made by Jemena to account for the 2005 capex adjustment. This is because the RFM contain input spaces which readily accommodate this adjustment. Our preliminary decision is to remove the proposed amendments to the RFM and record the difference between 2005 actual and forecast net capex (and return on this difference) into the RFM 'Input' sheet. We consider this is the appropriate approach to account for this adjustment required to establish the 2011 opening RAB.

Capitalised finance charges

Jemena's proposed actual gross capex for 2011 includes $2.7 million ($ nominal) in capitalised finance charges. We consider that capitalised finance charges should not be included as part of capex in the RFM because capex is recognised on an as-incurred basis. In response to an information request from us, Jemena acknowledged that including capitalised finance charges in actual capex was an oversight.[33] Our preliminary decision is to remove $2.7 million ($ nominal) in capitalised finance charges from Jemena's proposed 2011 gross capex.

2.4.2 Forecast closing RAB as at 31 December 2020

We forecast a closing RAB value of $1684.0 million ($ nominal) by 31 December 2020 for Jemena. This represents a reduction of 46.4 million, or 2.7 per cent to Jemena's proposal. This reduction reflects our preliminary decision on the required inputs for determining the forecast RAB in the PTRM. To determine the forecast RAB value, we amended the following PTRM inputs:

- We adjusted the opening RAB at 1 January 2016, as discussed in section 2.4.1.
- We reduced the proposed forecast inflation rate of 2.52 per cent per annum to 2.50 per cent per annum (attachment 3).
- We reduced the proposed forecast capex for the 2016–20 regulatory control period by $48.1 million or 6.1 per cent (attachment 6).
- We reduced the proposed forecast regulatory depreciation for the 2016–20 regulatory control period by $5.5 million or 2.3 per cent (attachment 5).

A submission from the Victorian Energy Consumer and User Alliance raised concern about the substantial growth in the value of the RAB for the Victorian DNSPs in recent

[33] Jemena, *Email response to AER information request AER JEN IR#010*, 10 July 2014.

years.[34] We have carefully reviewed the cost drivers of Jemena's forecast capex in terms of prudency and efficiency. We are not satisfied that Jemena proposed the most prudent and efficient option to address the need for augmentation capex to maintain security and reliability of supply. However, a greater proportion of Jemena's network assets are nearing the end of their life. This requires increased replacement capex to manage the deterioration in asset condition. Our preliminary decision is to reduce the proposed capex, a main driver of the increase in the value of Jemena's RAB, by $48.1 million. The details of our assessment of Jemena's capex are set out in attachment 6.

2.4.3 Application of depreciation approach in RAB roll forward for next reset

Jemena did not propose a depreciation approach to roll forward the RAB for the commencement of its 2021–25 regulatory control period.

We consider that the depreciation approach based on forecast capex (updated for actual inflation) should be used. This approach was signalled in the AER's framework and approach.[35] As discussed in attachment 10, Jemena is not currently subject to a capital expenditure sharing scheme (CESS) but we will apply the CESS to Jemena over the 2016–20 regulatory control period. We consider this scheme will provide sufficient incentives for Jemena to achieve capex efficiency gains over that period. We are satisfied that the use of a forecast depreciation approach in combination with the application of the CESS and our other ex post capex measures are sufficient to achieve the capex incentive objective.[36]

---

[34] Victorian Energy Consumer and User Alliance, *Submission to the AER Victorian distribution networks' 2016-20 revenue proposals*, 13 July 2015, pp. 22–24.

[35] AER, *Final Framework and Approach for the Victorian Electricity Distributors*, October 2014, pp. 121–126.

[36] Our ex post capex measures are set out in the capex incentives guideline, AER, *Capital expenditure incentive guideline for electricity network service providers*, November 2013, pp. 13–19, 20–21. The guideline also sets out how all our capex incentive measures are consistent with the capex incentive objective.