

DRAFT DECISION

SA Power Networks Distribution Determination 2020 to 2025

Attachment 12 Classification of services

October 2019



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Note

This attachment forms part of the AER's draft decision on the distribution determination that will apply to SA Power Networks for the 2020–2025 regulatory control period. It should be read with all other parts of the draft determination.

The draft 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
- Attachment 11 Demand management incentive scheme
- Attachment 12 Classification of services
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Shortened forms

Shortened form	Extended form
AEMC	Australian Energy Market Commission
AER	Australian Energy Regulator
DM	demand management
distributor	distribution network service provider
DUoS	distribution use of system
F&A	framework and approach
NEL	national electricity law
NER or the rules	national electricity rules
NSP	network service provider
RAB	regulatory asset base

12 Classification of services

Service classification determines the nature of economic regulation, if any, applicable to specific distribution services. Classification is important to customers as it determines which network services are included in basic electricity charges, the basis on which additional services are sold, and those services we will not regulate. Our decision reflects our assessment of a number of factors, including existing and potential competition to supply these services.

We are required to make a decision on the classification of SA Power Networks' distribution services in accordance with the NER.¹ Services are classified as direct control services or negotiated distribution services. Direct control services are further classified as standard control services or alternative control services. The classification that we apply determines the nature of the economic regulation we will apply to those services.

The classification of distribution services must be as set out in the relevant framework and approach (F&A) paper unless we consider that a material change in circumstances justify departing from that proposed classification.² We set out our proposed approach to the classification of distribution services for SA Power Networks in our F&A.³ We proposed to group SA Power Networks distribution services as follows:

- common distribution services
- ancillary services
- metering services
- connection services
- unregulated distribution services.

12.1 Draft decision

Our draft decision is to retain the classification structure as set out in our F&A, with the exception of a number of minor amendments to the services and activities listed within the above groupings. These amendments arise due to the publishing of our Service Classification Guideline (the Guideline) which became effective on 1 October 2018. We consider the publishing of the Guideline a material change of circumstances that justifies departing from the approach taken in the final F&A.⁴ In its regulatory proposal, SA Power Networks requested that the descriptions of certain services align with those

¹ NER, cl. 6.12.1(1).

² NER, cl. 6.12.3(b).

³ AER, Final framework and approach, SA Power Networks, Regulatory control period commencing 1 July 2020, July 2018.

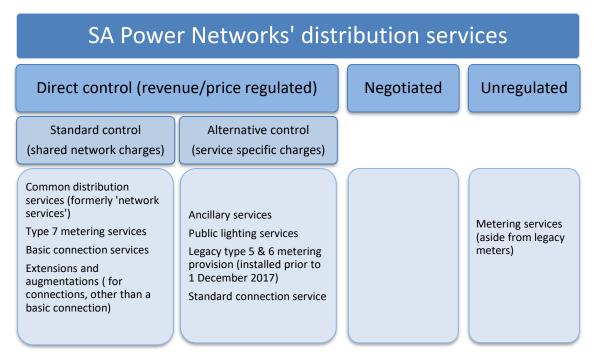
⁴ NER, cl. 6.12.3(b).

provided in the Guideline.⁵ They also made a number of requests to amend certain descriptions in order to meet jurisdictional or operational requirements.⁶ These are discussed in detail in section 12.4.

Figure 12.1 summarises our draft decision on service classifications for SA Power Networks for the 2020–25 regulatory control period.

Appendix A sets out our detailed classification decisions. We present changes in our classification approach since our F&A in highlighted text.

Figure 12.1 AER draft decision on 2020–25 service classification for SA Power Networks



Source: AER.

Our classification of services determines, at a very high level, how costs associated with the services will be recovered. How service charges are set is not determined as part of classification. We discuss that detail in the control mechanism attachment.⁷

12.2 SA Power Networks' proposal

Although our Service Classification Guideline is not binding on distributors, SA Power Networks anticipated that we might make changes to the proposed classifications made in the final F&A. As a result, in its proposal, SA Power Networks has compared

 ⁵ SA Power Networks, *Regulatory Proposal 2020–25 - Attachment 12 - Classification of Services*, January 2019, p.
 8.

 ⁶ SA Power Networks, *Regulatory Proposal 2020–25 - Attachment 12 - Classification of Services*, January 2019, pp. 9-16.

⁷ Refer to Attachment 13 – Control mechanisms and Attachment 15 – Alternative control services.

the services it offers to those provided in the baseline list published in the Guideline.⁸ SA Power Networks have proposed to largely adopt the classification approach set out in our F&A, while aligning with the baseline services list where it considers it is appropriate to do so. The SA Power Networks' proposal on service classification falls into three broad categories:

- 1. proposed departures from the final F&A to align with the Guideline;
- 2. proposed departures from the Guideline in preference for retaining the approach taken in the F&A; and
- 3. hybrid approach of adopting some of the wording from the baseline services list, provided in the Guideline, and adapting it to wording from the final F&A.

Category 1: Proposed departures from the final F&A to align with the Guideline include:

- Bulk supply point metering proposed as an activity under the Common distribution service.
- 'Connection management services' changed to 'Connection application and management services';
- description of Temporary connections;
- description only of 'Basic connection services';
- adoption of 'Standard connection services'; and
- adoption of 'Negotiated connection services'.

Category 2: Departing from the Guideline, in preference for retaining the approach taken in the final F&A include:

- retaining the classification of 'Basic connection services' as standard control services;
- retaining the description of network demand management activities for distribution "or system reliability, efficiency or security" purposes;
- retaining 'Type 5 & 6 meter installation & provision (prior to 1 Dec 2017)';
- retaining 'Third party requested outage for purposes of replacing a meter';
- retaining 'Emergency maintenance of failed metering equipment not owned by DNSP (contestable metering); and
- retaining 'Other additional customer dedicated connection lines/assets' as an activity under "Enhanced connection services".

 ⁸ SA Power Networks, *Regulatory Proposal 2020–25 - Attachment 12 - Classification of Services*, January 2019, p.
 7.

Category 3: proposed services which adopt some of the wording from the baseline services list, provided in the Guideline, and adapted it to wording from the final F&A includes:

- Network safety services inspection work undertaken to determine the cause of a customer fault where there may be a safety or reliability impact on the network or related component and associated works to rectify the impact on the network caused by a customer.
- Customer initiated 'or triggered' network asset relocations/re-arrangements -Relocation of assets that form part of the distribution network in circumstances where the relocation was initiated by a third party (including a customer) 'or triggered by a customer's non-compliance with network safety or security standards'.

Our approach to these requests is detailed in section 12.4.

12.3 Our assessment approach

In conducting our assessment of distribution service classification, we commence on the basis that we:

- classify the service, rather than the asset we can only decide on service classification if we understand what the service being provided is. That is, distribution service classification involves the classification of services distributors supply to customers rather than the classification of:
 - o the assets used to provide such services
 - the inputs/delivery methods distributors use to provide such services to customers
 - o services that consumers or other parties provide to distributors.
- classify distribution services in groups our general approach to service classification is to classify services in groupings rather than individually. This obviates the need to classify services one-by-one and instead defines a service cluster, that where a service is similar in nature it would require the same regulatory treatment. As a result, a new service with characteristics that are the same or essentially the same as other services within a group might simply be added to the existing group and hence be treated in the same way for ring-fencing purposes. This provides distributors with flexibility to alter the exact specification (but not the nature) of a service during a regulatory control period. Where we make a single classification for a group of services, it applies to each service in the group.

In making our classification decisions, we may:

- classify a service so the distributor may recover related costs from all customers (direct control – standard control service)
- classify a service so the user benefiting from the service pays (direct control alternative control service)

- allow customers and distributors to negotiate the provision and price of some services – we will arbitrate should negotiations stall (negotiated distribution service)⁹
- not classify a service we have no regulatory control over this service or the prices charged by the distributor (unregulated service).

Our classification approach

In deciding whether to classify services as either direct control or negotiated services, or to not classify them, the NER requires us to have regard to the 'form of regulation factors' set out in the NEL.¹⁰ The form of regulation factors includes the presence and extent of barriers to entry by alternative providers and the extent to which any distributor's market power is likely to be mitigated by any countervailing user or prospective user's market power. The NER also requires us to consider the previous form of regulation applied to services, the desirability for consistency in the form or regulation for similar services and any other relevant factor.¹¹

For services we intend to classify as direct control, the NER requires us to have regard to a further range of factors.¹² These include the potential to develop competition in provision of a service and how our classification may influence that potential; whether the costs of providing the service are attributable to a specific person; and, the possible effect of the classification on administrative costs.

In the case of some distribution services, we may determine there is sufficient competition such that there is no need for us to classify the service as either a direct control or negotiated distribution service. That is, the market is sufficiently competitive, allowing customers to shop around for the best price. We refer to these distribution services as 'unregulated distribution services'.

12.3.1 Interrelationships

In assessing what services we classify, we are setting the basis for what charges can be made for those services. To allow charges to be recovered for standard control services, assets associated with delivering those services are added to the regulatory asset base (RAB). A RAB may also be constructed for the capital costs associated with an alternative control service. There will usually be operating costs associated with the provision of a service as well.

The assets that make up the RAB, and the operating costs that relate to any particular service, form a starting point for our assessment of the distributor's proposal for

⁹ Note - One impact of the implementation of the Ring-fencing Guideline is to effectively eliminate the use of negotiated distribution services. Under Clause 3.1 a DNSP may provide distribution services and transmission services, but must not provide other services. (Other services are deemed to include negotiated services).

¹⁰ NER, cl. 6.2.1(c); NEL, s. 2F.

¹¹ NER, cl. 6.2.1(c).

¹² NER, cl. 6.2.2(c).

recovering revenues through charges for their services. Classification of services will therefore influence all revenue components of our decision.

There are assets and operating costs associated with the services provided by distributors. We set the revenues the distributor may collect from customers to recover their asset and operating costs. That revenue is recovered through tariffs the distributor develops to charge its customers. The regulatory regime establishes incentives such as the Efficiency Benefit Sharing Scheme and the Capital Expenditure Sharing Scheme to encourage the provision of services as efficiently as possible. All of these factors interrelate with each other. We must be cognisant of these interrelationships when we make our determinations.

12.4 Reasons for draft decision

This section sets out our reasons for our draft decision on the distribution service classifications for SA Power Networks. The NER requires our position on service classification to be as set out in our F&A unless a material change in circumstances justify a change in our classification approach.¹³

12.4.1 Bulk supply point metering

Our draft decision is to expand the list of activities that forms the Common distribution service, provided by SA Power Networks, to include bulk supply point metering as part of that bundle. The inclusion of bulk supply point metering as part of the Common distribution service does not affect its classification or pricing arrangements. Further, it distinguishes the activity from other types of metering services.

Bulk supply point metering refers to metering of connection points between the transmission system and the distribution system. This service is related to the measurement of Network Use of System (NUoS) charges levied on all distribution customers, rather than being a 'meter service' associated with a particular customer.

The need for the description of the Common distribution service for SA Power Networks to be expanded arises from the implementation of the Service Classification Guideline, where bulk supply point metering is included in the description of that service.¹⁴ We consider that the implementation of the Guideline, in October 2018, represents a material change of circumstances¹⁵ that has occurred since the final F&A for SA Power Networks was published six months earlier.

¹³ NER, cl. 6.12.3(b).

¹⁴ AER, *Electricity Distribution Service Classification Guideline*, September 2018, Appendix A: Baseline list of electricity distribution services, p. 1.

¹⁵ NER, cl. 6.12.3(b).

SA Power Networks in its regulatory proposal proposed that bulk supply point metering be included as part of the Common distribution service.¹⁶ Our draft decision is to accept this classification as it is consistent with the Guideline.

12.4.2 Connection services

Our draft decision is to reconfigure the terminology SA Power Networks use in the naming and description of Connection services to better align with that provided in the Service Classification Guideline. We consider that the implementation of the Guideline, in October 2018, represents a material change of circumstances.¹⁷ The baseline services list within the Guideline adopted terminology for connection services from Chapter 5A of the NER¹⁸. Connection services within the baseline list includes:¹⁹

- basic connections²⁰—a simple connection of a customer's premises to the network, involves no or minimal extension or augmentation.
- standard connections²¹—a connection to the network, that is not a basic connection service, and may be provided for a particular class or sub-class of connection applicant. It may involve extension and/or augmentation.
- negotiated connections²²—connections that meet the specific requirements of a connection applicant and the distributor, and may involve network extension or augmentation.

Our draft decision applies this terminology, along with the service descriptions in the Baseline list, to SA Power Networks' connection services. It does not however extend the classification provided in the Guideline, in all cases, to connection services provided by SA Power Networks.

The framework for connections we provided in the Guideline provides for harmonisation of connections terminology. However, we were explicit in the Guideline to express that in our view harmonisation of terminology did not imply that classification of connections should be consistent across jurisdictions.²³

¹⁹ AER, *Electricity Distribution Service Classification Guideline*, September 2018, Appendix A: Baseline list of electricity distribution services, pp. 6-7.

²¹ This service is based on the description of a standard connection service provided in Chapter 5A (5A.A.1) of the NER. A distributor may choose whether or not to provide such services in accordance with NER, cl.5A.B.4.

¹⁶ SA Power Networks, *Regulatory Proposal 2020–25 - Attachment 12 - Classification of services - Appendix A, January 2019, p. 33.*

¹⁷ NER, cl. 6.12.3(b).

¹⁸ AER, *Electricity Distribution Service Classification Guideline*, September 2018, p. 18.

²⁰ This service is based on the description of a basic connection service provided in Chapter 5A (5A.A.1) of the NER.

²² This service is based on the description of a negotiated connection contract provided in Chapter 5A Part c (5A.C.1) of the NER.

²³ AER, *Electricity Distribution Service Classification Guideline*, September 2018, p. 20.

Basic Connections

In applying the terminology of the Guideline, SA Power Networks have proposed departing from the Guideline in order to maintain the classification of the basic connection service as standard control. This approach is consistent with the F&A. We agree that this approach maintains the arrangements that exist in the current regulatory period and will avoid materially impacting customers by way of cost increases.²⁴ Our draft decision therefore, is to change the description of the basic connection service to align with the baseline line services list, while maintaining the classification as standard control.

New connection services

Our draft decision creates two new connection services for SA Power Networks; Standard connections and Negotiated connections. The creation of the new services is due to SA Power Networks adopting the connections terminology of the NER as per the Service Classification Guideline, the publication of which we consider a material change of circumstance, as discussed above. Each service is discussed in detail below.

Standard connections

Our draft decision is to classify Standard connection services as direct control as the distributor must approve access and materials connected to its network infrastructure.²⁵ Standard connections are connections, other than a basic connection for a particular class (or sub class) of connection application and for which a model standing offer has been approved by the AER.²⁶ Premises connections require no augmentation or extension and costs under this grouping are directly attributed to whom the service is provided.²⁷ As a result, a classification of alternative control is appropriate for Premises connections provided under the Standard connections framework. A classification of alternative control is also consistent with the framework we laid out in our Service Classification Guideline. In the Guideline we explained that our preferred approach is that customers pay for their dedicated connection costs.²⁸

Standard connections which require an extension or augmentation are classified differently. Our draft decision is to classify Standard connections requiring an extension or augmentation as standard control. Extensions and Augmentations, though they may be triggered by a customer connection request, form part of the shared network once constructed. As a result, all customers connected to the network, or the augmented

²⁴ NER, cl. 6.2.2(2) & (3).

²⁵ NER, cl. 6.2.1(c)(5) and AER, *Electricity Distribution Service Classification Guideline*, September 2018, Appendix A: Baseline list of electricity distribution services, p. 10.

²⁶ NER, cl. 5A.A.1.

²⁷ NER, cl. 6.2.2(c) and AER, *Electricity Distribution Service Classification Guideline*, September 2018, Appendix A: Baseline list of electricity distribution services, p. 10.

²⁸ AER, *Electricity Distribution Service Classification Guideline*, September 2018, p. 19.

part of the network, benefit from the augmentation. Accordingly, we consider that a classification of standard control is appropriate. In taking into account the factors in the NER, we consider that NER cl. 6.2.2(c)(6) (other factors) is applicable; a classification of standard control promotes efficient connection to the network and equitable customer outcomes. A classification of standard control is also consistent with the framework we laid out in our Service Classification Guideline.²⁹

It is noteworthy that a classification of standard control does not indicate that the service is provided at no cost to the customer, with costs smeared across all customers on the network. As we spelled out in our Guideline, the connecting applicant is expected to pay a contribution according to the cost revenue test. A capital contribution, takes account of the incremental revenue generated by the connection, ensuring that customers who require extensions or augmentation to complete the connection pay an appropriate contribution to those costs. This approach separates the price for the connection service to the premises from the DUOS charges attributable to standard control services.³⁰

Negotiated connection services

Our draft decision is to classify Negotiated connection services as direct control as the distributor must approve access and materials connected to its network infrastructure.³¹ Negotiated connections are connection services (other than a basic connection service) for which the distributor provides a connection offer for a negotiated connection contract.³² Like standard connection services, negotiated connections may also be for premises connections only, or require an extension or augmentation.

Our draft decision is to classify negotiated premises connections that do not require an extension or augmentation as alternative control for the same reasons as provided for standard connections. Our draft decision is to classify negotiated premises connections which require either an extension or augmentation as standard control, for the same reasons as provided for Standard connections requiring extension or augmentation.

12.4.3 Connection application and management services

Our draft decision is to change the name of the grouping "Connection management services" to "Connection application and management services". This change is to align the name, and the description of the activities provided as part of the service, with

²⁹ NER, cl. 6.2.2(c) and AER, *Electricity Distribution Service Classification Guideline*, September 2018, Appendix A: Baseline list of electricity distribution services, p. 10.

³⁰ AER, *Electricity Distribution Service Classification Guideline*, September 2018, p. 19.

³¹ NER, cl. 6.2.1(c)(5) and AER, *Electricity Distribution Service Classification Guideline*, September 2018, Appendix A: Baseline list of electricity distribution services, p. 10.

³² NER, cl. 5A.A.1.

the baseline list as provided in the Service Classification Guideline.³³ The change of service name improves the consistency of the name and description of the service between distributors. We consider that the implementation of the Guideline, in October 2018, represents a material change of circumstances.³⁴ Further, for the same reasons as listed above, our draft decision is to change the name of 'Temporary connections', an activity under the "Connection application and management services" grouping to align with the baseline list.³⁵ The new description of the service will be: "temporary connections (of a size less than the shared network augmentation threshold) as a basic connection service e.g. builder's supply, fetes, etc." Similarly, 'Connection application application related services'.

Requests to depart from the Service Classification Guideline

As outlined in section 12.2, SA Power Networks have proposed, for a number of services, to depart from the Guideline in order to retain the approach taken in the final F&A. This section discusses each service in detail, explaining our approach to the draft decision.

12.4.4 Procurement and provision of network demand management activities

Our draft decision is to retain the description of this activity we approved in our final F&A for SA Power Networks. Procurement and provision of network demand management activities for distribution *or system reliability, efficiency or security* purposes is an activity provided as part of the Common distribution service. In our Service Classification Guideline we used the wording: procurement and provision of network demand management activities for distribution purposes.³⁶ We argued that capital and operational expenditure for the purposes of "the quality, reliability or security of supply" of standard control services are adequately covered by the NER cll. 6.5.6(a)(iii) and 6.5.7(a)(iii). We felt that adding these terms specifically to demand management (DM) went beyond the objectives of Chapter 6 of the NER.³⁷

Despite this, in the final F&A for the Victorian distributors we classified the activity using the same terminology as requested by SA Power Networks.³⁸ The desirability of

³³ AER, *Electricity Distribution Service Classification Guideline*, September 2018, Appendix A: Baseline list of electricity distribution services, p. 7.

³⁴ NER, cl. 6.12.3(b).

³⁵ AER, *Electricity Distribution Service Classification Guideline*, September 2018, Appendix A: Baseline list of electricity distribution services, p. 7.

³⁶ AER, *Electricity Distribution Service Classification Guideline*, September 2018, p. 14.

³⁷ AER, *Explanatory Statement - Electricity Distribution Service Classification Guideline*, September 2018, Attachment A: Summary of submissions on the draft Electricity Distribution Service Classification Guideline and our response

³⁸ AER, Final framework and approach for AusNet Services, CitiPower, Jemena, Powercor and United Energy -Regulatory control period commencing 1 January 2021 - Appendix B, p. 98.

consistency in the form of regulation for similar services (both within and beyond the relevant jurisdiction), is a factor we must have regard to when classifying services.³⁹

In their regulatory proposal, SA Power Networks submitted that interdependencies exist between demand management activities performs for distribution purposes, as compared to the broader activities it is required to perform for power system reliability, efficiency or security purposes. As a result, we consider that our draft decision to retain the description of the activity as published in the final F&A is consistent with cl. 2F(b) and (c) of the NEL, as well as clauses 6.2.1(c)(3) and 6.2.2(c) of the NER.

12.4.5 Type 5 & 6 meter installation & provision (prior to 1 Dec 2017)

Our draft decision is to retain this as a classified service for SA Power Networks for the 2020–25 regulatory period. This service was included in the final F&A to enable SA Power Networks to continue to recover the capital costs associated with legacy metering equipment. We also included a similar classified service for Victorian distributors in the final F&A.⁴⁰ Further, it is a continuation of a service that is being provided in the current 2015–20 regulatory period, with no change to its classification. As a result, we consider that our draft decision is consistent with clauses 6.2.1(c)(2), (3) and 6.2.2(c)(3) & (4) of the NER.

12.4.6 Third party requested outage to replace a meter

Our draft decision is to retain 'Third party requested outage for purposes of replacing a meter' as a classified service for SA Power Networks for the 2020–25 regulatory period. We note that this service was added into SA Power Networks' classified services list in the final F&A with little commentary justifying the service in accordance with the rules. Despite this, we consider that the service as described by SA Power Networks is a distribution service as it is provided by means of, or in connection with a distribution system.⁴¹ Considering whether the service should be classified as standard control or alternative control, we note the following:

- the service is only offered when the retailer cannot conduct the planned interruption⁴²; and
- the costs for providing the service are directly attributable to the person to whom the service is provided.⁴³

As a result, we consider that a classification of direct control and further as alternative is control is appropriate.

³⁹ NER, cll. 6.2.1(c)(3), 6.2.2(c).

⁴⁰ AER, Final framework and approach for AusNet Services, CitiPower, Jemena, Powercor and United Energy -Regulatory control period commencing 1 January 2021 - Appendix B, January 2019, p. 105.

⁴¹ NER, Chapter 10 Glossary.

⁴² Therefore does not affect the competitive market for the service as per NER, cl. 6.2.2(c)(1).

⁴³ NER, cl. 6.2.2(c)(5)

12.4.7 Emergency maintenance of failed metering equipment not owned by DNSP (contestable metering)

Our draft decision is to classify this service as alternative control, consistent with our final F&A. However, we are removing the 'wasted truck visit fee' from the service description, consistent with the approach we outlined in our Service Classification Guideline and subsequent F&A decisions.⁴⁴ Our draft decision also clarifies our expectation regarding the conditions under which the service is provided. We accomplish this by changing the name of the service to: 'Emergency supply restoration in relation to metering equipment not owned by the distributor (contestable metering)'. Reasons for the departure from the final F&A follow below.

Under 7.8.1(c) of the NER, only metering providers appointed by the Metering Coordinator can maintain a metering installation. The National Energy Retail Amendment (Metering Installation Timeframes) Rule 2018, published on 6 December 2018, made the following determination:

"...Metering coordinators must replace or repair a small customer's malfunctioning meter as soon as practicable, but no later than 15 business days after they have been notified of the meter installation malfunction."⁴⁵

Further, in the case of a power outage due to a failed meter the rule also dictates that:

"In rare cases where a customer has experienced a loss of electricity as a result of a faulty meter, the local DNSP should undertake its usual practices maintaining supply until it is repaired or replaced."⁴⁶

The AEMC ruling did not specify how supply is to be restored, only that the distributor is responsible for restoration according to its "usual practice". We believe that this provides distributors with enough latitude to be able to restore supply in a safe and effective manner.

Accordingly, we consider that changing the name of the service to 'Emergency supply restoration in relation to metering equipment not owned by the distributor (contestable metering)' provides additional clarity as to the service being provided. The new name of the service connects directly to the description of the service as approved in our final F&A. In doing so, we also draw the distinction between restoration of supply, in relation to metering equipment, that is performed on the request of the metering provider/coordinator and that performed without the consent of the metering provider/coordinator. Restoration of supply performed without consent of the responsible person (metering coordinator or provider) cannot be charged the ACS fee.

⁴⁴ See AER, Explanatory Statement - Electricity Distribution Service Classification Guideline, September 2018, pgs. 11 & 20; AER, Final framework and approach for AusNet Services, CitiPower, Jemena, Powercor and United Energy - Regulatory control period commencing 1 January 2021 - Appendix B, January 2019, p. 32.

⁴⁵ AEMC, National Energy Retail Amendment (Metering Installation Timeframes) Rule 2018, p. 55

⁴⁶ AEMC, National Energy Retail Amendment (Metering Installation Timeframes) Rule 2018, p. 57

We consider that when the 'Emergency supply restoration in relation to metering equipment not owned by the distributor' service is provided as per the description in the classified services list, it is a distribution service, as it is provided by means of, or in connection with a distribution system.⁴⁷ Therefore a classification of direct control is appropriate. Further, as the costs for providing the service are directly attributable to the person to whom the service is provided,⁴⁸ we consider that a classification of alternative control is appropriate.

However, we depart from the final F&A by not classifying the second part of the service description, the fee for which is described as follows:

"This fee will also be levied where a metering provider has requested the distributor to check a potentially faulty network connection and when tested by the distributor, no fault is found."⁴⁹

The departure from the final F&A arises due to a material change of circumstance,⁵⁰ the publishing of our Service Classification Guideline. We consider that this part of the service amounts to a 'wasted truck visit fee'. The Explanatory statement to the Guideline discussed such service fees as activities that may take place in the course of delivering a distribution service, not a service in itself.⁵¹ Accordingly, distributors can list the activity as a chargeable item in its proposed price list for alternative control services. For the purposes of consistency in the regulatory approach between jurisdictions⁵² we consider that not classifying this activity as part of the service is appropriate.

12.4.8 Enhanced connection services

Our draft decision is to retain 'other additional customer dedicated lines / assets' as part of the list of enhanced connection services, published in our final F&A, for which SA Power Networks may charge an ACS fee. As noted in SA Power Networks' regulatory proposal, the addition was omitted from the baseline services list in our Service Classification Guideline.⁵³

12.4.9 Network safety services

Our draft decision is to approve the classification of the Network Safety Service grouping, with a classification of alternative control, albeit with a change to the description to better reflect the actual service being provided. The new name of the

⁴⁷ NER, Chapter 10 Glossary.

⁴⁸ NER, cl. 6.2.2(c)(5).

⁴⁹ AER, *Final Framework and Approach, SA Power Networks 2020–25*, Appendix C - Classified services list.

⁵⁰ NER, cl. 6.12.3(b).

⁵¹ AER, *Explanatory Statement - Electricity Distribution Service Classification Guideline*, September 2018, pgs. 11 & 20.

⁵² NER, cl. 6.2.2(c)(5).

⁵³ SA Power Networks, Regulatory Proposal 2020–25 - Attachment 12, January 2019, p. 12; AER, Explanatory Statement - Electricity Distribution Service Classification Guideline, September 2018, Attachment A.

activity is: "Customer requested network inspection undertaken to determine the cause of a customer outage where there may be a safety or reliability impact on the network or related component and associated works to rectify a customer caused impact to the network".

In its regulatory proposal, SA Power Networks submitted that the previous description published in our final F&A⁵⁴ does not adequately describe the nature of the activity performed by SA Power Networks in providing network safety services to customers. The solution according to the proposal is to add *'associated works to rectify the impact on the network by the customer'*.⁵⁵ The service as described has elements in common with recoverable works. In our Explanatory statement to the Service Classification Guideline, we considered that the recovery of costs to rectify impacts on the network caused by customers should be performed through the recoverable works activity as part of the Common distribution service.⁵⁶

Further consultation with SA Power Networks revealed that the activity is provided in limited circumstances, and that the rectification costs are typically relatively low. The main example is where a customer has installed equipment connected to the network that consequently causes an outage, such as from a blown service fuse. Where this is the case and the customer calls SA Power Networks to restore supply, the distributor will inform the customer that if the outage has been caused by equipment installed behind the customer's meter, that an inspection fee will be levied. For clarification, there is no ACS charge if customer outage was caused by a fault on the network. The customer will also be charged a rectification fee for returning the network to its original condition, which in the case above would involve replacing the service fuse.

In such cases, where the cost of rectification is relatively minor, there are efficiencies to be gained by allowing the distributor to charge an ACS fee, rather than to claim costs through the common law courts, as may be required through the recoverable works process. Recoverable works are more suited to situations when rectification costs are high and restoration of supply needs to be performed in a timely manner (for example, repairs to a power pole following a motor vehicle accident).⁵⁷

We consider that when the service as described above is provided as per the description in the classified services list, it is a distribution service, as it is provided by means of, or in connection with a distribution system.⁵⁸ Therefore a classification of direct control is appropriate. Further, as the costs for providing the service are directly attributable to the person to whom the service is provided,⁵⁹ and taking into account

⁵⁴ AER, Final Framework and Approach, SA Power Networks 2020–25, Appendix C - Classified services list.

⁵⁵ SA Power Networks, Regulatory Proposal 2020–25 - Attachment 12, January 2019, p. 11

⁵⁶ AER, *Explanatory Statement - Electricity Distribution Service Classification Guideline*, September 2018, Attachment A.

⁵⁷ AER, Final framework and approach for AusNet Services, CitiPower, Jemena, Powercor and United Energy -Regulatory control period commencing 1 January 2021, January 2019, p. 26.

⁵⁸ NER, Chapter 10 Glossary.

⁵⁹ NER, cl. 6.2.2(c)(5).

the possible effect of costs of the distributor and users or potential users,⁶⁰ we consider that a classification of alternative control is appropriate. This is broadly consistent to the approach we took in the final F&A,⁶¹ with the exception of a change to the description to better reflect the service as delivered.

12.4.10 Customer initiated 'or triggered' network asset relocations/re-arrangements

Our draft decision is to change the name of the service, as requested by SA Power Networks in its regulatory proposal⁶², to provide additional clarity to when the service is provided. This clarification aligns the name of the service with the description of the service we approved in our final F&A. Our draft decision also adopts some of the wording from our baseline services list in the Service Classification Guideline, changing the name of the service from: 'Customer initiated asset relocations' to: 'Customer initiated or triggered network asset relocations / rearrangements'. We consider that the change better reflects the service as provided by SA Power Networks.

12.4.11 Fault response

Our draft decision is to remove the 'Fault response' service from SA Power Networks' classified services list. Fault response is no longer a service that we classify. In the final F&A we approved fault response as a service SA Power Networks could supply to recover costs associated with wasted truck visits. SA Power Networks, and other distributors have previously described the service as:

"attendance at a customer's premises to restore supply or investigate power quality issues where it is determined that the fault was unrelated to the distributor's equipment or infrastructure".⁶³

We detailed our approach to this 'service' in the Explanatory statement to the Service Classification Guideline where we characterised it as a 'wasted truck visit fee'.⁶⁴ As noted in the Explanatory statement; we do not agree with such a service. In most cases, rectification of faults on the customer side of the connection are generally contestable and not the responsibility of the DNSP. We are of the view that a 'wasted truck visit' fee should only be associated with the alternative control service that the distributor is attempting to provide. This charge should appear as a line item in the distributor might send a truck to a customer's premises to perform an alternative control be performed. In this case, the distributor can charge for that truck visit on an alternative

⁶⁰ NER, cl. 6.2.2(c)(2).

⁶¹ AER, Final Framework and Approach, SA Power Networks 2020–25, Appendix C - Classified services list.

⁶² SA Power Networks, *Regulatory Proposal 2020–25 - Attachment 12*, January 2019, p. 11.

⁶³ AER, *Final Framework and Approach, SA Power Networks 2020–25*, Appendix C - Classified services list.

⁶⁴ AER, *Explanatory Statement - Electricity Distribution Service Classification Guideline*, September 2018, p. 20.

control basis because it occurred in the course of performing an alternative control service.⁶⁵

We consider the publishing of the Guideline a material change of circumstances that justifies departing from the approach taken in the final F&A.⁶⁶ We note, with reference to clause 6.2.2(c)(4) of the NER, that this decision is consistent with the final F&A for Victorian distributors.⁶⁷

12.4.12 Unregulated services

Our draft decision is to retain the list of unregulated services we included in the final F&A. This is a departure from the Service classification Guideline. We agree with SA Power Networks' proposal that including the list of four unregulated services, which did not appear in the baseline services list, provides greater clarity for stakeholders. Unregulated distribution services are services which are offered into sufficiently competitive markets for us to consider that there is no need for classification.⁶⁸ Unregulated services are subject to Ring-fencing obligations. The unregulated services list is designed to be non-exhaustive.

⁶⁵ AER, *Explanatory Statement - Electricity Distribution Service Classification Guideline*, September 2018, p. 20.

⁶⁶ NER, cl. 6.12.3(b).

⁶⁷ NER, cl. 6.2.2(c)(4) and AER, *Final framework and approach for AusNet Services, CitiPower, Jemena, Powercor and United Energy - Regulatory control period commencing 1 January 2021, January 2019, p. 20.*

⁶⁸ AER, *Final framework and approach – SA Power Networks 2020–25*, p. 19.

A AER draft decision on classification of SA distribution services⁶⁹

[Update based on final F&A] ⁷⁰					
Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25		
Common distribution ser relating to network integr	vice – use of the distribution network for the conveyance/flow of electricit ity)	y (including the	services		
Common distribution service (formerly 'network services')	 The suite of activities that includes, but is not limited to, the following: the planning, design, repair, maintenance, construction, and operation of the distribution network the relocation of assets that form part of the distribution network but not relocations requested by a third party (including a customer) ongoing inspection of private electrical works (not part of the shared network) required under legislation for safety reasons 	Standard Control	Standard Control		
	works to fix damage to the network (including emergency recoverable works)				

⁶⁹ The examples and activities listed in the 'Further description' column are not intended to be an exhaustive list and some distributors may not offer all activities listed. Rather the examples provide a sufficient indication of the types of activities captured by the service.

⁷⁰ AER – Final framework and approach – SA Power Networks 2020–25 – Appendix C.

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	support for another network during an emergency event	_	
	 procurement and provision of network demand management activities for distribution or system reliability, efficiency or security purposes 		
	 training internal staff and contractors delivering direct control services 		
	 activities related to 'shared asset facilitation' of distributor assets 		
	 emergency disconnect for safety reasons and work conducted to restore a failed component of the distribution system to an operational state upon investigating a customer outage 		
	bulk supply point metering		
	 rectification of simple customer fault (e.g. fuse) relating to a life support customer or other critical health and safety issues 		
	 establishment and maintenance of national metering identifiers (NMIs) in market and/or network billing systems, and other market and regulatory obligations 		
	 investigation of customer-reported network faults. 		
	Such services do not include a service that has been separately classified including any activity relating to that service.		
Connection Services	services relating to the electrical or physical connection of a customer to the	ne network	

Basic connection services	Means a connection service related to a connection (or a proposed connection) between a	Standard	Premises
	distribution system and a retail customer's premises (excluding a non-registered	Control/	Connections =

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	embedded generator's premises) in the following circumstances: (a) either: (1) the retail customer is typical of a significant class of retail customers who have sought, or are likely to seek, the service; or	Negotiated distribution service	Standard Control + customer contributions
	 (2) the retail customer is, or proposes to become, a micro embedded generator; and Connection Services include: (b) the provision of the service involves minimal or no augmentation of the distribution 		
	network; and (c) a model standing offer has been approved by the AER for providing that service as a basic connection service.		
	 Premises connection services – includes any additions or upgrades to the connection assets located on the customer's premises (note: excludes all metering services). Extensions – includes an enhancement required to connect a powerline or facility outside the present boundaries of the transmission or distribution network owned or 		
	 Outside the present boundaries of the transmission or distribution network owned or operated by a DNSP. Network augmentations — includes any shared network enlargement / enhancement understand of a distributor which is not an extension. 		
	These services are subject to customer contributions determined according to SA Power Networks' Connection Policy. These services exclude connection services for large embedded generators (30 kW 3		

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	phase or above or 5 kW 1 phase and above. See below).		
Standard connection services	Means a connection service (other than a basic connection service) for a particular class (or sub-class) of connection applicant and for which a model standing offer has been approved by the AER.	Not currently offered	Premises connections = Alternative Control Extensions and
			Augmentations = Standard Control + customer contributions
Negotiated connection services	Means a connection service (other than a basic connection service) for which a distributor provides a connection offer for a negotiated connection contract.	Not currently offered	Premises connections = Alternative Control
			Extensions and Augmentations = Standard Control + customer contributions
Enhanced connection services	Other or enhanced connection services provided at the request of a customer or third party that include those that are:	Negotiated distribution	Alternative Control

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	 Provision of connection services above minimum requirements – customer requests increase in reliability or quality of supply beyond the standard, and/or above minimum regulatory requirements (e.g. reserve feeder); 	service	
	 Provided with higher quality of reliability standards, or lower quality of reliability standards (where permissible) than required by the NER or any other applicable regulatory instruments; 		
	 In excess of levels of service or plant ratings required to be provided by SA Power Networks; 		
	 For large embedded generators (30 kW 3 phase or above 5 kW 1 phase and above); or 		
	Other additional customer dedicated connection lines / assets.		
Connection application and management services	 Works initiated by a customer or retailer which are specific to the connection point. Includes, but is not limited to: connection application services 	Negotiated distribution service	Alternative Control
	de-energisation		
	re-energisation		
	 temporary connections (of a size less than the shared network augmentation threshold) as a basic connection service e.g. builder's supply, fetes, etc. 		
	remove or reposition connection		

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	 overhead service line replacement – customer requests the existing overhead service to be replaced (e.g. as a result of a point of attachment relocation). No material change to load 		
	protection and power quality assessment		
	 supply enhancement (e.g. upgrade from single phase to three phase) 		
	 customer requested change requiring secondary and primary plant studies for safe operation of the network (e.g. change protection settings) 		
	upgrade from overhead to underground service		
	 rectification of illegal connections or damage to overhead or underground service cables 		
	 calculation of a site specific distribution loss factor on request in respect of a generating unit up to 10 MW or a connection point for an end-user with actual or forecast load up to 40 GWh per annum capacity, as per clause 3.6.3(b1) of the NER 		

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	power factor correction.		

Metering Services⁷¹ —activities relating to the measurement of electricity supplied to and from customers through the distribution system (excluding network meters)

Type 1 to 4 metering services	Type 1 to 4 metering installations and supporting services are competitively available.	Negotiated distribution service & Alternative Control	Unregulated
Type 5 and 6 meter installation and provision (prior to 1 December 2017)	Recovery of the capital cost of type 5 and 6 metering equipment installed (including metering with internally integrated load control devices).	Alternative Control	Alternative Control
Type 5 and 6 meter maintenance, reading and data services (legacy meters)	 Meter maintenance covers works to inspect, test, and maintain metering installations. Meter reading refers to quarterly or other regular reading of a metering installation including field visits and remotely read meters. Metering data services includes for example: services that involve the collection, 	Alternative Control	Alternative Control

⁷¹ SA Power Networks will continue to be responsible for type 5 and 6 meters until they are replaced (and entitled to levy associated charges). We refer to these meters as 'legacy meters'. New meters (that will be type 1 to 4 meters) installed from 1 December 2017 are referred to as 'contestable meters'.

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	processing, storage and delivery of metering data, the provision of metering data in accordance with regulatory obligations, remote or self-reading at difficult to access sites, and the management of relevant NMI Standing Data in accordance with the NER.		
Type 7 metering services	Administration and management of type 7 metering installations in accordance with the NER and jurisdictional requirements. Includes the processing and delivery of calculated metering data for unmetered loads, and the population and maintenance of load tables, inventory tables and on/off tables.	Standard Control	Standard Control
Auxiliary metering services (Type 5 to 7 metering installations)	 Activities include: Off-cycle meter reads for type 5 and 6 meters. Requests to test, inspect and investigate, or alter an existing type 5 or 6 metering installation. Testing and maintenance of instrument transformers for type 5 and 6 metering purposes. Type 5 to 7 non-standard metering services. Works to re-seal a type 5 or 6 meter due to customer or third party action (e.g. by having electrical work done on site). Change distributor load control relay channel on request that is not a part of the initial load control installation, nor part of standard asset maintenance or replacement. 	Negotiated distribution service	Alternative control
Emergency-maintenance of failed Emergency supply restoration in	The distributor is called out by a customer or their agent (e.g. retailer, Metering Coordinator or Metering Provider) due to a power outage where an external Metering	Not previously	Alternative

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
relation to metering equipment not owned by the distributor (contestable metering)	Provider's metering equipment has failed or an outage has been caused by the Metering Provider and the distributor has had to restore power to the customer's premises. This may result in an unmetered supply arrangement at this site. This fee will also be levied where a metering provider has requested the distributor to check a potentially faulty network connection and when tested by the distributor, no fault is found.	classified in SA	Control
Meter recovery and disposal – type 5 and 6 (legacy meters)	 Activities include the removal and disposal of a type 5 or 6 metering installation: At the request of the customer or their agent, where an existing type 5 or 6 metering installation remains installed at the premises and a replacement meter is not required. At the request of the customer or their agent, where a permanent disconnection has been requested where it has not been removed and disposed of by the incoming metering provider. 	Not previously classified in SA	Alternative Control
Network metering services	Bulk supply point metering	Standard Control	Standard Control
Third party requested outage for purposes of replacing a meter	At the request of a retailer or metering coordinator provide notification to affected customers and facilitate the disconnection/reconnection of customer metering installations where a retailer planned interruption cannot be conducted.	Not previously classified in SA	Alternative control
Network ancillary services - Services closely related to common distribution services but for which a separate charge applies.			
Access permits, oversight and facilitation services	 Activities include: A distributor issuing access permits or clearances to work to a person authorised to work on or near distribution systems including high and low voltage. 	Negotiated distribution service	Alternative Control

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	• A distributor issuing confined space entry permits and associated safe entry equipment to a person authorised to enter a confined space.		
	• A distributor providing access to switch rooms, substations and other network plant to a non-LNSP party who is accompanied and supervised by a distributor's staff member. May also include a distributor providing safe entry equipment (fall-arrest) to enter difficult access areas.		
	 Specialist services (which may involve design related activities and oversight/inspections of works) where the design or construction is non-standard, technically complex or environmentally sensitive and any enquiries related to distributor assets. 		
	Facilitation of generator connection and operation on the network.		
	 Facilitation of activities within clearances of distributor's assets, including physical and electrical isolation of assets. 		
Third party funded network upgrades or other improvements.	Upgrades or alterations to the shared distribution network to enable third party infrastructure (e.g. NBN Co telecommunications assets) to be installed on the shared distribution network.	Negotiated distribution service	Alternative Control
	This does not relate to upstream distribution network augmentation.		
Network safety services	Examples include:fitting of tiger tails as requested by a customer or directed by the OTRhigh load escorts	Negotiated distribution service	Alternative control

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	 de-energising wires for safe approach Customer requested network inspection undertaken to determine the cause of a customer outage and rectification of customer fault where there may be a safety and or reliability impact on the network or related component and associated works to rectify a customer caused impact to the network⁷² 		
Sale of approved materials or equipment	Includes the sale of approved materials/equipment to third parties for connection assets that are gifted back to become part of the shared distribution network.	Negotiated distribution service	Alternative control
Notices of arrangement and completion notices	 Examples include: Work of an administrative nature where a local council requires evidence in writing from the distributor that all necessary arrangements have been made to supply electricity to a development. This includes: receiving and checking subdivision plans, copying subdivision plans, checking and recording easement details, assessing supply availability, liaising with developers if errors or changes are required, and preparing notifications of arrangement. Provision of a completion notice (other than a notice of arrangement). This applies where the real estate developer requests the distributor to provide documentation 		

⁷² An ACS charge is not applicable where it is determined that the customer outage was caused by a fault on the network.

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	confirming progress of work. Usually associated with discharging contractual arrangements (e.g. progress payments) to meet contractual undertakings.		
Rectification works to maintain network safety	Activities include issues identified by the DNSP and work involved in managing and resolving pre-summer bushfire inspection customer vegetation defects or aerial mains where the customer has failed to do so.	Not previously classified	Alternative control
Planned interruption – customer requested	 Examples include: Where the customer requests to move a planned interruption, and agrees to fund the additional cost of performing this distribution service outside of normal business hours. customer initiated network outage (e.g. to allow customer and/or contractor to perform maintenance on the customer's assets, work close to or for safe approach, which impacts other networks users). 	Negotiated distribution service	Alternative Control
Attendance at customers' premises to perform a statutory right where access is prevented	A follow up attendance at a customer's premises to perform a statutory right where access was prevented or declined by the customer on the initial visit. This may include the costs of arranging, and the provision of, a security escort or police escort (where the cost is passed through to the distributor).	Negotiated distribution service	Alternative Control
Inspection and auditing services	 Activities include: inspection and reinspection by a distributor of assets, installed or relocated by a third party investigation, review and implementation of remedial actions that may lead to corrective and disciplinary action of a third party service provider due to unsafe 	Negotiated distribution service	Alternative Control

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	practices or substandard workmanship		
	 auditing of a third party service provider's work practices in the field 		
	 after hours examination and/or testing of the consumer mains and main switchboard prior to initial energisation (upon request) 		
	 after hours visual examination of an electrical installation to reconnect it to a source of electricity (upon request) 		
	• re-test at a customer's installation, where the installation fails the initial test and cannot be connected.		
Provision of training to third parties for network related access	Training services provided to third parties that result in a set of learning outcomes that are required to obtain a distribution network access authorisation specific to a distributor's network. Such learning outcomes may include those necessary to demonstrate competency in the distributor's electrical safety rules, to hold an access authority on the distributor's network and to carry out switching on the distributor's network. Examples of training might include high voltage training, protection training or working near power lines training.	Not classified in SA	Alternative Control
Authorisation and approval of third party service providers design, work and materials	 Activities include: Authorisation or re-authorisation of individual employees and subcontractors of third party service providers and additional authorisations at the request of the third party service providers (excludes training services). Acceptance of third party designs and works. 	Not previously classified	Alternative control

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	• Assessing an application from a third party to consider approval of alternative material and equipment items that are not specified in the distributor's approved materials list.		
Security lights	Provision, installation, operation and maintenance of equipment mounted on the distribution network used for security services, e.g. nightwatchman lights Note: excludes connection services.	Negotiated distribution service	Alternative Control
Customer initiated <mark>or triggered network</mark> asset relocations/re- arrangements	 Preparation of offer and performance of work for the distribution network in circumstances where the relocation was initiated by a third party (including a customer), or triggered by a customer's non-compliance with network safety or security standards. 	Negotiated Distribution Service	Alternative control
Customer requested provision of electricity network or consumption data	Data requests by customers or third parties including requests for the provision of electricity network data or consumption data outside of legislative obligations.	Alternative control	Alternative control
Fault response	Attendance at a customer's premises to restore supply or investigate power quality issues where it is determined that the fault was not related to the distributor's equipment or infrastructure (this excludes circumstances where the fault relates to the network).	Not previously classified in SA	Alternative control
Third party funded network alterations or other improvements	Alterations or other improvements to the shared distribution network to enable third party infrastructure (e.g. NBN Co telecommunications assets) to be installed on the shared distribution network. This does not relate to upstream distribution network augmentation.	Not previously classified in SA	Alternative control
Public Lighting Services			

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
Public Lighting	Includes provision, construction and maintenance of public lighting and emerging public lighting technology.	Negotiated distribution service	Alternative Control
Unregulated Distribution S	Services - (non-exhaustive list)		
Distribution asset rental	Rental of distribution assets to third parties (e.g. office space rental, pole and duct rental for hanging telecommunication wires etc.).	Unregulated	Unregulated
Contestable metering support roles	Includes metering coordinator, metering data provider and metering provider for Type 1 to 4 metering installations.	Unregulated	Unregulated
Type 5 and 6 meter data management to other electricity distributors	The provision of type 5 and 6 meter data management to other electricity distribution network service providers.	Unregulated	Unregulated
Provision of training to third parties for work not associated with common distribution services nor network services	Training programs provided to third parties for work that is not associated with the provision of common distribution services nor network access.	Unregulated	Unregulated