

Written Responses

Responses to the 2023/24 to 2027/28 Access Arrangement Regulatory Information Notice

July 2022

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Overview

Australian Gas Networks Limited (AGN) is required to respond to the 2023 - 2028 Access Arrangement (AA) Regulatory Information Notice (RIN) issued by the Australian Energy Regulator on 8 March 2022 for its Victoria and New South Wales gas distribution networks under the National Gas Law (NGL) with information relating to regulatory years from 2023/24 to 2027/28.

This document, and its associated attachments, set out AGN's RIN responses. The document is structured to mirror the structure of the RIN, as follows:

- Schedule 1 General Requirements
- Schedule 2 Reset Information
- Schedule 3 Historical Information
- Schedule 4 Prepare and Maintain Information
- Appendix E Instructions

AGN's RIN documents and templates are included and summarised in below Table.

Table: AA RIN Attachments

RIN Document Number	Name
Attachment 1	Written Response
Attachment 2	Basis of Preparation
Attachment 3	Workbook 1 – Forecast Data (Consolidated information - Confidential)
Attachment 4	Workbook 1 – Forecast Data (Consolidated information - Public)
Attachment 5	Workbook 2 – Historical Data (Consolidated information - Confidential)
Attachment 6	Workbook 2 – Historical Data (Consolidated information - Public)
Attachment 7	Workbook 2 – Historical Data (Actual Information – Confidential)
Attachment 8	Workbook 2 – Historical Data (Actual Information – Public)
Attachment 9	Workbook 2 – Historical Data (Estimated Information - Confidential)
Attachment 10	Workbook 2 – Historical Data (Estimated Information - Public)
Attachment 11	Workbook 3 – Efficiency Carryover Mechanism (Consolidated information - Public)
Attachment 12	Workbook 4 – Bill Impacts (Consolidated information – Public)
Attachment 13	Workbook 6 – Capital expenditure sharing scheme model (Consolidated information – Public)
Attachment 14	Workbook 6 – Capital expenditure sharing scheme model (Actual information – Public)
Attachment 15	Workbook 6 – Capital expenditure sharing scheme model (Estimated information – Public)
Attachment 16	Resubmission of Workbook 1 – Historical Performance Data 2011-2017 (Consolidated information - Confidential)
Attachment 17	Document Index (Public)

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Attachment 1

Attachment 18	Confidentiality Claims (Public)
Attachment 19	Audit opinions (Confidential)
Attachment 20	Audit opinions (Public)
Attachment 21	Statutory Declaration (Confidential)
Attachment 22	Statutory Declaration (Public)
Supporting documents	Includes policies, models, reports, analyses, plans and certifications.

This RIN responses should be read in conjunction with AGN's 2023-2028 Final Plan. AGN's Final Plan consists of the Plan as well as the associated attachments.

1. Schedule 1 – General Requirements

1.1 General

Requirement			Response		
1. Provide Information		Information			
1.1 Provide the information required in each <i>regulatory template</i> TI in the Microsoft Excel workbooks attached at Appendix A of completed in accordance with:		ne Microsoft Excel workbooks attached at Appendix A	The regulatory templates have been populated in accordance with the requirements of the RIN. Please refer to RIN Attachments 3 -15.		
	(a)	this <i>notice</i> ; and			
	(b)	the instructions in Appendix E.			
1.2 For all information, other than <i>forecast information</i> , provide in accordance with this notice and the instructions in <i>Appendix E</i> , a <i>basis of preparation</i> demonstrating how the pipeline service provider has complied with this <i>notice</i> with respect to the information provided in each of the <i>regulatory templates</i> .		rdance with this notice and the instructions in <i>Appendix E</i> , sis of preparation demonstrating how the pipeline service ider has complied with this <i>notice</i> with respect to the	Refer to the Basis of Preparation document provided in RIN Attachment 2.		
1.3 Where changes to the methodology for the allocation of costs have been made within the <i>current access arrangement period</i> , explain the changes and the effect of each change to the information reported in response to this notice.		e been made within the <i>current access arrangement</i> od, explain the changes and the effect of each change to	There have been no changes to the methodology for the allocation of costs from a regulatory perspective within the current access arrangement period.		
1.4	4 Provide material used for the purposes of preparing the <i>access</i> arrangement proposal including:		AGN's Access Arrangement Proposal (Final Plan) includes:		
			(a) All consultants' reports relied on to develop AGN's AA proposal are included.		
	(a) all consultants' reports commissioned and relied upon in	Please refer to RIN Attachment 17;			
	(1-1)	whole or in part;	(b) A description of all material assumptions has been provided in response to		
	(b)	all material assumptions relied upon;	clause 1.5;		
	(c)	Schedule 2 of this <i>notice</i> and where it is provided in or	(c) This document includes a table of reference between Schedule 2 of the RIN and the AA proposal. Please refer to <i>Schedule 2 – Reset Information</i> .		
		as part of the access arrangement proposal;	(d) A table of reference explaining the relationship between all documents submitted as part of AA proposal is included in the RIN Attachment 17.		

Requirement Response

- (d) a table that references each *document* provided in or as part of the *access arrangement proposal* and its relationship to other *documents* provided; and
- (e) each document identified in paragraph 1.4(d) must be given a meaningful filename in the form:

[pipeline service provider] - [Author] - [title] - [date] - [public/confidential], where:

- Author is the author of the file which if not the pipeline service provider may be, for example, a consultant or other third party;
- (i) **Title** provides a meaningful description of the content of document, with limited reliance on acronyms or cross references, for example "Appendix 1A" is not meaningful, but "Appendix 1A Cost allocation method" is;
- (ii) **Date** is a relevant date associated with the file, generally the date the document was created;
- (iii) **Public/confidential** identifies if the file in its entirety can be published (public); or if it contains any information which is the subject of a claim for confidentiality in accordance with paragraph 2 of this Schedule (confidential).

(e) Please refer to the RIN Attachment 17. This table also includes the filename required by the RIN.

- 1.5 Provide for each *material* assumption identified in the response to paragraph 1.4(b):
 - (a) its source or basis;
 - (b) if applicable, its quantum;
 - (c) whether, and how, the assumption has been applied and was taken into account; and

Material assumptions in relation to operating expenditure (opex) and capital expenditure (capex) are identified in the response to clause 5.1 of Schedule 1.

Attachment 1 Response Requirement the effect or impact of the assumption on the capital (d) and operating expenditure forecasts in the next access arrangement period taking into account: the actual expenditure incurred during the current access arrangement period; and the sensitivity of the forecast expenditure to the assumption. 2. Confidential Information

- This clause applies to any information the *pipeline service* AGN has applied clause 2.1 as required. *provider* provides:

- in response to Schedules 1, 2 and 3; (a)
- in an access arrangement proposal for the next access arrangement period (a proposal);
- in a revision or amendment to a proposal; and
- in a submission the *pipeline service provider* makes regarding a *proposal* or a revised or amended *proposal*; (together, the *pipeline service provider's* information).
- confidentiality over any of the pipeline service provider's information, the pipeline service provider must provide the details of that claim in accordance with the requirements of the AER's Confidentiality Guideline, as if it extended and applied to that claim for confidentiality.

2.2 If the pipeline service provider wishes to make a claim for AGN has made claims for confidentiality for information submitted as part of this RIN response and part of its Final Plan. The claims for confidentiality have been made in line with the AER's Confidentiality Guideline and are attached to this RIN response. Please refer to Attachment 1.4 of the Final Plan and RIN Attachment 18.

claim for confidentiality in response to paragraph 2.2 at the the claim. same time as making the claim for confidentiality.

2.3 The pipeline service provider must provide any details of a AGN's claims for confidentiality includes the relevant details at the time of making

3. Resubmission of Information

- 3.1 If the *pipeline service provider* is required to resubmit information provided under this *notice* in subsequent *regulatory years*, the *pipeline service provider* must provide:
 - (a) The relevant Microsoft Excel Workbook(s) fully populated with the latest submitted data and with revised information marked as amended using the 'Mark selection as AMENDED' tool within the Microsoft Excel Workbook(s);
 - (b) the reason for the resubmission;
 - (c) a statement as to whether or not the resubmitted information results in a *material* change in the *pipeline* service provider's response to this *notice*.

AGN is resubmitting the AGN Vic Historical Data 2011-2017 RIN to reflect a minor change in the allocation of a capex project in 2017. This change affects the following tables:

- E1.1.1 Capex Reference Services Connections, Meter Replacement, Other Capex and Capital Contributions
- E1.3.1 Capcons Reference Services Connections
- E11.3.2 Labour/Non Labour Expenditure split Capex Non Labour expenditure
- F2.4.2 Capex by Asset Class Actual as incurred Mains & Services, Meters and Other Assets
- F2.5.1 Capital Contributions by Asset Class Actual as incurred Mains & Services

AGN does not believe this change is material. Net Capex for 2017 has reduced by \$1.7k with a +/- movement of approximately \$200k between Connections and Meter Replacement.

Please refer to the Basis of Preparation RIN Attachment 2 for further information and the resubmitted Workbook 1 Historical Performance Data 2011-2017, RIN Attachment 16

- 3.2 If the *pipeline service provider* resubmits historical information which results in a material change to its response to this *notice*, the *AER* may request the *pipeline service provider* provide assurance over this information by:
 - (a) verifying the resubmitted information by way of a statutory declaration in accordance with Appendix B of *this notice*; and
 - (b) provide the necessary *audit opinion report* and the *review conclusion statements* as applicable for the resubmitted information, prepared in accordance with the requirements set out in Appendix C of this *notice*.

Not applicable.

In addition, this correction has been audited as part of the assurance over Workbook 2 Historical data.

3.3 If the AER requests assurance over the resubmitted historical Not applicable information in accordance with paragraph 11.2, such assurance information must be provided at the time the next annual response to this notice is due or on a date otherwise agreed to by the AER.

1.2 Assurance Requirements

Requ	uirement	Response	
4.	Audit Opinion Reports and Review Conclusion Statements		
4.1	Provide the audit opinion report and review conclusion statements as applicable, prepared in accordance with the	Refer to the audit opinion report and other reports from the auditor provided in RIN Attachments 19 and 20.	
	C	Please note as per Appendix C, 1.3, an Agreed-Upon Procedure has been performed over Workbook 3 – ECM given AGN has previously provided audited information to the AER consistent with what is required under this notice.	
4.2	Provide all reports from the auditor to the pipeline service provider's management regarding the review conclusion	Refer to the audit opinion report and other reports from the auditor provided in RIN Attachments 19 and 20.	
	statements and/or auditors' opinions report or assessment.	Please note as per Appendix C 1.3, an Agreed-Upon Procedure has been performed over Workbook 3 – ECM given AGN has previously provided audited information to the AER consistent with what is required under this notice.	
5.	Director Certification		
5.1	Provide, by the directors of the <i>pipeline service provider</i> , a certification of the reasonableness of the key assumptions relating to the methodology used for developing the <i>pipeline service provider</i> 's <i>operating expenditure</i> and capital expenditure forecasts.	AGN's director has certified the reasonableness of the key assumptions, which underline the methodology AGN used to forecast its capex and opex. Please refer to Appendix 1.	
6.	Statutory Declaration		

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Requirement		Response	
6.1	The notice requires a company officer of AGN to attest to the quality of the information provided in response to the notice, in accordance with the statutory declaration set out at Appendix B.	Refer to the statutory declarations provided in RIN Attachments 21 and 22.	

Requ	uirement	Response
6.2	When attesting to the quality of the <i>forecast informati</i> provided the officer of AGN should take into account relevant factors including (but not limited to) whether <i>forecast information</i> provided in response to this notice (i) meets the requirements of the <i>NGL</i> and the <i>NG</i> that should be taken into account when preparite the information for the <i>notice</i> and <i>access arrangement proposal;</i> (ii) meets the requirements of this <i>notice;</i> (iii) reflects the outcomes of the consumer consultate undertaken to prepare the <i>access arrangement proposal;</i> (iv) is consistent with the information provided in the <i>access arrangement proposal</i> of the <i>pipeline set provider,</i> including the models for asset roll for operating expenditure, capital expenditure and revenue forecasts; (v) is based on assumptions, which are identified in response to paragraph 1.4(b) of Schedule 1 to <i>notice,</i> and are justified and supported by evide (vi) is consistent with applicable <i>AER</i> Guidelines, or where it varies from those guidelines, is consist with the variation as set out in the <i>access arrangement proposal;</i> and (vii) is consistent, to the extent possible, with historian information previously provided to the <i>AER</i> .	ee: RR ing ition ne arvice ward, n this ence; ent
	arrangement proposal; and(vii) is consistent, to the extent possible, with historia	ical

Requ	irement	Response	
6.3	When attesting to the quality of the historical information provided the officer of AGN should take into account relevant factors including (but not limited to) whether estimated historical information provided in response to this notice:	Refer to the statutory declarations provided in RIN Attachments 21 and 22.	
	(i) meets the requirements of this <i>notice</i> ;		
	(ii) is based on assumptions, which are identified in response to paragraph 1.4(b) of Schedule 1 to this <i>notice;</i> and are justified and supported by evidence;		
	(iii) is consistent with applicable <i>AER</i> Guidelines, or where it varies from those guidelines, is consistent with the variation as set out in the <i>access arrangement proposal</i> ; and		
	(iv) is consistent, to the extent possible, with historical information previously provided to the <i>AER</i> .		

2. Schedule 2 - Reset Information

2.1 General Requirements

Requirement		ent	Response	
1. S	Service	Provider Details and Business Context		
Local agent of a service provider1.1 Provide all details of any local agent(s) of the pipeline service provider (s. 11 of the NGL).		vide all details of any local agent(s) of the pipeline service	AGN is not a foreign company (within the meaning of <i>the Corporations Act 2001</i> (Cth), and as such has not appointed any local agent, within the meaning contemplated by s11 of the National Gas Law.	
2. Background to the pipeline		ound to the pipeline		
Pipeline and pipeline services		nd pipeline services	AGN does not provide pipeline services that are non-reference services.	
2.1 For the <i>current access arrangement period</i> for each pipeline service provided by way of the <i>pipeline service provider's</i> gas distribution network that is not specified as a <i>reference service</i> in the <i>pipeline service provider's access arrangement proposal</i> , provide in the materials submitted to the <i>AER</i> :		ded by way of the <i>pipeline service provider's</i> gas distribution ork that is not specified as a <i>reference service</i> in the <i>pipeline ice provider's access arrangement proposal</i> , provide in the		
	(a)	the volume of gas distributed throughout the <i>gas distribution network</i> each <i>regulatory year</i> , and		
(b) the number of <i>users</i> .		the number of <i>users</i> .		

2.2 Expenditure Requirements

Requirement		Response
3.	Capital Expenditure	
3.1	The information required to be provided, prepared, kept or maintained in this part of the notice relates to all <i>pipeline services</i> , including both <i>reference services</i> and <i>non-reference services</i> .	Unless otherwise required by the RIN, our RIN response includes the information about pipeline services, however AGN Victoria and Albury have no historical or forecast capital expenditure related to non-reference services for the periods covered by this notice.

Requirement Capital expenditure in the previous and current access Refer to the completed Workbook 2 – Historical provided in RIN Attachments 5 arrangement period Provide capital expenditure at a project level and at a capital expenditure subcategory level in Workbook 2 - Historical data, regulatory templates E2 to E6, E10, E12 and E13. Where data is either not available to the pipeline service provider or it is not

- explain why; and
- (b) provide data at the most disaggregated level available.

practical to produce the data in the materials submitted to the AER:

Capital expenditure in the current access arrangement period

- Explain in the materials submitted to the AER:
 - in terms of the nature of the work undertaken (scope, scale or other deviation from proposed works), the volume and the cost (deviation in unit rates), any material difference for each capital expenditure purpose between:
 - the capital expenditure approved by the AER and the actual and/or estimated capital expenditure for the current access arrangement period; and
 - the capital expenditure proposed by the pipeline service provider and the actual and/or estimated capital expenditure for the current access arrangement period; and
 - whether and how the *pipeline service provider* considers that conforming capital expenditure to be added to the capital base in the current access arrangement period meets the requirements of r. 79 of the NGR.

Response

to 10.

There are two subcategories of capital expenditure that could not be reported because the information is not available. Those were as follows:

- Table E4.1.3 Meter Installation
- Table E4.1.4 Other Meter Replacement Capex

AGN and APA's business systems record new and refurbished meter replacement capex but does not separately identify activities and costs for meter installation or other meter replacement capex. All meter replacement capex has been reported as either new or refurbished meters, which includes an element of installation and any other associated costs, which is the most disaggregated level available for this information.

- 3.3 (a) refer to the explanation of material differences between:
 - the capital expenditure approved by the AER and the actual and/or estimated capital expenditure for the current AA period is provided in Appendix 2; and
 - the capital expenditure proposed by AGN Victoria and Albury and the actual and/or estimated capital expenditure for the current AA period is provided in Appendix 2.
- 3.3 (b) Please refer to Chapters 9 & 10 of the Final Plan.

Req	uirem	ent	Response
Speculative capital expenditure account, reused redundant assets, redundant assets and disposals in the <i>current access arrangement period</i>		edundant assets and disposals in the current access	AGN did not have a speculative capex account during the reporting period.
3.4 Provide an explanation in the materials submitted to the <i>AER</i> whether and how the <i>pipeline service provider</i> considers the requirements of r. 79 of the <i>NGR</i> are met for any amounts added to or deducted from the <i>capital base</i> in the <i>current access arrangement period</i> :		ther and how the <i>pipeline service provider</i> considers the irements of r. 79 of the <i>NGR</i> are met for any amounts added or deducted from the <i>capital base</i> in the <i>current access</i>	
	(a)	from the speculative capital expenditure account;	
	(b)	for the reuse of redundant assets;	
	(c)	for redundant assets; and	
	(d)	for <i>disposals</i> .	
	Forecast conforming capital expenditure in the next access arrangement period		Please refer to Chapter 9 of the Final Plan Attachments 9.1-9.14 and Workbook 1 - Forecast Data RIN Attachments 3 and 4.
3.5 For each <i>capital expenditure purpose</i> identified in the <i>Workbook</i> 1 – <i>Reset (forecast) data, regulatory templates</i> E2 to E13, provide in the materials submitted to the <i>AER</i> an overall description including:		Reset (forecast) data, regulatory templates E2 to E13, ide in the materials submitted to the AER an overall description	
	(a)	a definition and explanation of any materiality threshold test that the <i>pipeline service provider</i> intends to apply to categorise forecast conforming <i>capital expenditure projects</i> ;	
	(b)	the nature of forecast conforming capital expenditure projects or programs material to each capital expenditure purpose, including a brief description of the capital expenditure and, where relevant, the location of the expenditure on the distribution pipeline;	
	(c)	key drivers of the proposed expenditure;	
	(d)	an explanation of how expenditure is distinguished between:	

Requirement				Response
		(i)	new customer connections capital expenditure and augmentation capital expenditure;	
		(ii)	augmentation capital expenditure, driven by demand, mains replacement capital expenditure and other capital expenditure, driven by asset condition and other drivers; and	
		(iii)	any capital expenditure purpose or operating expenditure category where the pipeline service provider considers that there is reasonable scope for ambiguity in categorisation.	
	(e)	expe	Is as to whether the forecast conforming <i>capital inditure</i> is to be funded by parties other than the <i>pipeline ice provider</i> , and	(e) Not applicable.
	(f)	contr	Is of contractual agreements with parties where <i>capital ributions</i> are made by <i>users</i> for new <i>capital expenditure</i> r. 82).	(f) Not applicable.
3.6	3.6 For forecast <i>conforming capital expenditure</i> , in total and in terms of each <i>capital expenditure purpose</i> , explain in the materials submitted to the <i>AER</i> :		apital expenditure purpose, explain in the materials	Please refer to Chapter 9 of the Final Plan.
	(a)	criter	it reasonably reflects the new <i>capital expenditure</i> ria set out in r. 79(1) of the <i>NGR</i> , and how the <i>pipeline ice provider</i> has interpreted these criteria;	
	(b)	unde	the forecast conforming <i>capital expenditure</i> is justified r r. 79(2) of the <i>NGR</i> and how the <i>pipeline service ider</i> has interpreted these sub-rules; and	
	(c)		any plans, policies, <i>procedures</i> , regulatory obligations quirements, consultants' reports, <i>economic analysis</i> and	

	assumptions have been used to justify the forecast conforming capital expenditure. 79(2)(a) is relied on to justify the forecast conforming capital inditure, provide in the materials submitted to the AER: the calculations of the economic value of the capital expenditure that directly accrues to the service provider, gas producers, users and end users; and	Please refer to Attachments 9.7 to 9.14 of the Final Plan.
<i>expe</i> (a)	conforming capital expenditure. 79(2)(a) is relied on to justify the forecast conforming capital inditure, provide in the materials submitted to the AER: the calculations of the economic value of the capital expenditure that directly accrues to the service provider, gas producers, users and end users; and	Please refer to Attachments 9.7 to 9.14 of the Final Plan.
<i>expe</i> (a)	the calculations of the economic value of the capital expenditure that directly accrues to the service provider, gas producers, users and end users; and	Please refer to Attachments 9.7 to 9.14 of the Final Plan.
	expenditure that directly accrues to the service provider, gas producers, users and end users; and	
(b)		
	an explanation of the nature and quantification of the economic value that directly accrues to the <i>service provider</i> , gas producer, <i>users</i> and end <i>users</i> (see r. 79(3)).	
If r. 79(2)(b) is relied on to justify forecast <i>conforming capital expenditure</i> , provide in the materials submitted to the <i>AER</i> :		Please refer to Attachments 9.7 to 9.14 of the Final Plan.
(a)	the information the <i>pipeline service provider</i> relied on to determine the expected incremental <i>revenue</i> to be generated as a result of the forecast <i>conforming capital expenditure</i> ;	
(b)	a description of the incremental service or services (see r. $79(4)(a)$);	
(c)	the gross revenue derived from the incremental service (see r. $79(4)(b)$);	
(d)	the incremental expenditure (see r. 79(4)(b)); and	
(e)	the discount rates that the <i>pipeline service provider</i> used to determine the present value of the incremental <i>revenue</i> .	
conf	orming capital expenditure, provide in the materials submitted	Please refer to Attachments 9.7 to 9.14 of the Final Plan.
(a)	an explanation of which item in r. 79(2)(c)(i), (ii) or (iii) is	
(b) (c) (c) (c) (d) (d) (d) (d) (d) (d) (d) (d) (d) (d	r. confo	determine the expected incremental <i>revenue</i> to be generated as a result of the forecast <i>conforming capital expenditure</i> ; a description of the incremental service or services (see r. 79(4)(a)); the gross revenue derived from the incremental service (see r. 79(4)(b)); the incremental expenditure (see r. 79(4)(b)); and the discount rates that the <i>pipeline service provider</i> used to determine the present value of the incremental <i>revenue</i> . r. 79(2)(c)(i), (ii) or (iii) is relied on to justify the forecast conforming capital expenditure, provide in the materials submitted the <i>AER</i> :

			Attachment
Requ	ıirem	ent	Response
	(b)	the relevant <i>regulatory obligation or requirement</i> (if any) and the relevant authority or body enforcing it;	
	(c)	an explanation of whether and how the <i>pipeline service</i> provider considers that the forecast conforming capital expenditure satisfies the item in r. 79(2)(c)(i), (ii) or (iii) being relied on; and	
	(d)	any supporting technical or other external or internal reports about whether and how the <i>pipeline service provider</i> considers that the forecast <i>conforming capital expenditure</i> addresses the relevant item in r. 79(2)(c)(i), (ii) or (iii).	
3.10		79(2)(c)(iv) is relied on to justify forecast <i>conforming capital</i> anditure, provide in the materials submitted to the AER:	Please refer to Attachments 9.7 to 9.14 of the Final Plan.
	(a)	an explanation of how the conforming capital expenditure is necessary to maintain the pipeline service provider's capacity to meet levels of demand for services; and	
	(b)	any reports or other information and documentation that supports whether and how the <i>pipeline service provider</i> considers that the forecast <i>capital expenditure</i> will maintain the capacity to meet the levels of demand for services.	
3.11		the each <i>capital expenditure purpose</i> provide a <i>project</i> list h details for each <i>project</i> :	Please refer to Attachments 9.7 to 9.14 of the Final Plan.
	(a)	an <i>internal identification code</i> , which will enable the <i>pipeline</i> service provider to report actual capital expenditure against forecast capital expenditure;	
	(b)	the <i>project</i> name used internally by the <i>pipeline service</i> provider,	
	(c)	the cost and timing of the project capital expenditure; and	
	(d)	a brief description of the <i>project</i> and its scope.	

Requ	uirem	ent	Response
Capi	tal ex	penditure forecast method	
3.12		ribe in the materials submitted to the <i>AER</i> how the forecast forming capital expenditure was prepared, including:	Please refer to Chapter 9 of the Final Plan.
	(a) the forecasting methodologies used;	·	
	(b)	how its preparation differed or related to budgetary, planning and governance processes used in the normal running of the <i>pipeline service provider's</i> business;	
	(c)	processes for ensuring amounts are free of error and other steps in quality assurance; and	
	(d)	if and how the <i>pipeline service provider</i> considered the resulting amounts, when translated into price impacts, were in the long term interest of consumers.	
3.13	In relation to any source material (including models, documentation or any other items containing quantitative data) used by the <i>pipeline service provider</i> to develop its forecast <i>conforming capital expenditure</i> , provide in the materials submitted to the <i>AER</i> :		Please refer to Chapter 9 and Attachments 9.1-9.14 of the Final Plan.
	(a)	a copy of this source material; and	
	(b)	all calculations that demonstrate how data from the source material has been manipulated or transformed to generate data provided in the <i>regulatory templates</i> .	
3.14	4 Identify in the materials submitted to the <i>AER</i> which particular items of the <i>pipeline service provider's</i> forecast <i>conforming capital expenditure</i> have been:		Please refer to Attachments 9.7 – 9.14 of the Final Plan.
	(a)	derived directly from competitive tender processes;	
	(b)	based upon competitive tender processes for similar projects;	

Requ	uireme	ent	Response	
	(c)	based upon estimates obtained from contractors or manufacturers;		
	(d)	based upon independent benchmarks;		
	(e)	based upon actual historical costs for similar projects; and		
	(f)	reflective of any amounts for risk, uncertainty or other unspecified contingency factors, and if so, how these amounts were calculated and deemed reasonable.		
3.15	Provide in the materials submitted to the <i>AER</i> , any relevant internal decision making <i>documents</i> relating to approval of the forecast <i>conforming capital expenditure</i> and any other internal or external documentation or models that justify the forecast <i>conforming capital expenditure</i> , including but not limited to:		Please refer to Attachments 9.1-9.14 of the Final Plan.	
	(a)	business cases;		
	(b)	feasibility studies;		
	(c)	forecast demand studies and internal reports; and		
	(d)	the date of any relevant internal decision making body/management decisions and board decisions.		
3.16 Provide in the materials submitted to the <i>AER</i> all <i>documents</i> which were taken into account and relate to the <i>deliverability</i> of forecast <i>conforming capital expenditure</i> and explain the proposed <i>deliverability</i> .		taken into account and relate to the <i>deliverability</i> of forecast <i>orming capital expenditure</i> and explain the proposed	Please refer to Attachments 9.1-9.14 of the Final Plan.	
		orming capital expenditure in the next access ent period	Not applicable.	
3.17		de in the materials submitted to the AER in relation to non- printing capital expenditure:		
	(a)	details of the mechanism to prevent the <i>pipeline service</i> provider from benefiting, through increased revenue, from		

Requirement Response

the capital contributions by a user in the next access arrangement period (see r. 82(3)).

Capital redundancy policy in the next access arrangement period Not applicable.

- 3.18 If relevant, provide in the materials submitted to the AER:
 - an explanation of the proposed mechanism to remove redundant assets from the capital base including:
 - when the mechanism will take effect; and
 - whether the mechanism includes a proposal for cost sharing between the service provider and users associated with a decline in demand for pipeline services;
 - an explanation of why the mechanism is being included;
 - an explanation of what uncertainty the mechanism may cause; and
 - the effect of this uncertainty on the *pipeline service provider*.

Operating Expenditure

Operating expenditure in the *current access arrangement period* (a) AGN does not have any related parties.

- 4.1 For the *current access arrangement period* in the materials submitted to the AER:
 - identify all relevant related parties; and
 - provide an explanation of any non-recurring expenditures and the expenditure incurred for each of the non-recurring expenditures each regulatory year.
- (b) AGN does not have any non-recurring expenditure.

Forecast operating expenditure in the next access arrangement period

				Attachinent	
Requ	uireme	ent		Response	
4.2	For forecast total <i>operating expenditure</i> provide in the materials submitted to the <i>AER</i> :		, , , ,	(a) Please refer to Chapter 8 of the Final Plan.	
	 (a) a description and explanation of the major drivers for the increase/decrease in expenditure for each operating expenditure category between the current access arrangement period and the next access arrangement period; 				
	(b)	information on any changes to the operations of the pipeline from the <i>current access arrangement period</i> that have resulted in <i>material</i> changes to <i>operating expenditure</i> categories and total <i>operating expenditure</i> in the <i>next access arrangement period</i> , including a definition of the materiality threshold used by the <i>pipeline service provider</i> to identify such changes;		(b) Please refer to Chapter 8 of the Final Plan.(c) Please refer to Chapter 8 of the Final Plan and Attachment 8.1 of the Final	
	(c)	the r	models or methodology used to develop the forecast operating expenditure; and	Plan.	
	(d)	a description of how the forecast was prepared, including:		(d) Please refer to Chapter 8 of the Final Plan.	
		(i)	how <i>forecast operating expenditure</i> reasonably reflects the criteria set out in r. 91(1) of the <i>NGR</i> ;	•	
		(ii)	if a revealed cost base year approach was used to forecast total operating expenditure;		
			(1) what the base year is; and		
			(2) why that base year represents efficient, recurrent costs;		
		(iii)	if a revealed cost <i>base year</i> approach was not used to forecast total <i>operating expenditure</i> ;		
			(1) whether there was a year of historical <i>operating expenditure</i> available that represents efficient, recurrent costs; and		

			Attaciment	
Requ	uirem	ent	Response	
		(2) if not, why no year of historical <i>operating</i> expenditure represents efficient, recurrent costs; and		
		(iv) any non-recurrent expenditure in the <i>base year</i> and each year of the <i>next access arrangement period</i> .		
Outp	out gr	owth	Please refer to Chapter 8 and Attachments 8.1 and 9.3 of the Final Plan.	
4.3	Provi	de in the materials submitted to the AER:		
	(a)	all output growth drivers included in the forecast;		
	(b)	any economies of scale factors applied to the growth drivers;		
	(c)	evidence that the growth drivers explain cost changes due to output growth; and		
	(d)	any weightings applied if multiple output growth drivers have been used.		
4.4	Expla	ain in the materials submitted to the AER:	Please refer to Chapter 8 of the Final Plan.	
	(a)	how the growth drivers have been applied in the <i>operating</i> expenditure forecast; and		
	(b)	how the forecast method accounts for economies of scale.		
Real	l price	changes	Please refer to Chapter 8 and Attachments 8.4-8.5 of the Final Plan.	
4.5	Expla	ain in the materials submitted to the AER:		
	(a)	how the real price measures have been applied in the operating expenditure forecast; and		
	(b)	whether the labour price measure compensates for any form of labour productivity change.		
Proc	ductivi	ity change	Please refer to Chapter 8 and Attachment 8.6 of the Final Plan.	
4.6		ain in the materials submitted to the AER:		

Requirement Response

- how the forecast changes in productivity have been applied in the *operating expenditure* forecast;
- whether the forecast productivity changes capture the historical trend of cost increases due to new regulatory obligations or requirements and changes to industry best practice: and
- whether the productivity measure used to forecast operating expenditure includes productivity change compensated for by the labour price measure used to forecast the change in the price of labour.

Step changes

- due to changes in policies, strategies and obligations) provide in 9.7, 9.13 and 9.14 of the Final Plan. the materials submitted to the AER:
 - a description of the step change, including when the change occurred, or when it is expected to occur, what its driver is, and how the driver has changed (e.g. the change in a regulatory obligation); and
 - a demonstration, including all supporting justifications, for when and how the step change affected or is expected to affect expenditures (historical and forecast), with respect to:
 - any of the operating expenditure categories; and (i)
 - total operating expenditure.
- explain in the materials submitted to the AER:
 - why the efficient costs of the step change are not provided by other aspects of the operating expenditure forecast including, for example, base operating expenditure, output

For all step changes in forecast operating expenditure (including Please refer to Chapter 8 of the Final Plan and Attachments 8.2, 8.3 and 9.3,

5.2 For each step change identified in response to paragraph 5.1, Please refer to Chapter 8 of the Final Plan and Attachments 8.2, 8.3 and 9.3, 9.7, 9.13 and 9.14 of the Final Plan.

			Attaciment	
Requirement			Response	
		growth, real price growth or forecast productivity change; and		
	(b)	why the <i>step change</i> is required to contribute to a total <i>forecast operating expenditure</i> that reasonably reflects the criteria set out in r. 91(1) of the <i>NGR</i> .		
5.3	For a	Ill step changes in forecast expenditure provide:	Please refer to RIN Attachment 3 and 4 Workbook 1 – Reset (Forecast) data.	
	(a)	In Workbook 1 – Reset (forecast) data, regulatory template E17 the step changes expenditure:		
		(i) forecast for each year of the <i>forthcoming access</i> arrangement period; and		
		(ii) expected to be incurred in the <i>current access</i> arrangement period; and		
	(b)	a description of the step change.		
5.4	For each <i>step change</i> listed in response to paragraph 5.3, provide in the materials submitted to the <i>AER</i> an explanation of:		Please refer to Chapter 8 of the Final Plan and Attachments 8.2, 8.3 and 9.3, 9.7, 9.13 and 9.14 of the Final Plan.	
	(a)	when the change occurred, or is expected to occur;		
	(b)	what the driver of the step change is;		
	(c)	how the driver has changed or will change (for example, revised legislation may lead to a change in a regulatory obligation or requirement); and		
	(d)	whether the step change is recurrent in nature.		
5.5	in th	each <i>step change</i> listed in response to paragraph 5.3, provide e materials submitted to the <i>AER</i> justification for when, and the <i>step change</i> affected, or is expected to affect:		
	(a)	the relevant operating expenditure category;		
	(b)	the relevant capital expenditure purpose;		

Requ	uirem	ent	Response
	(c) (d)	total <i>operating expenditure</i> ; and total <i>capital expenditure</i> .	(d) Not applicable
5.6	For each <i>step change</i> listed in response to paragraph 5.3, provide in the materials submitted to the <i>AER</i> the process undertaken by the <i>pipeline service provider</i> to identify and quantify the <i>step change</i> ; and the cost benefit analysis that demonstrates the <i>pipeline service provider</i> proposes to address the <i>step change</i> in a prudent and efficient manner, including:		Please refer to Chapter 8 of the Final Plan and Attachments 8.2, 8.3 and 9.3, 9.7, 9.13 and 9.14 of the Final Plan.
	(a)	the timing of the step change; and	
	(b)	if the <i>pipeline service provider</i> considered a 'do nothing' option, evidence of how the <i>pipeline service provider</i> assessed the risks of this option compared with other options.	
5.7	If the <i>step change</i> was due to a change in a regulatory obligation or requirement provide in the materials submitted to the <i>AER</i> :		Please refer to Chapter 8 of the Final Plan and Attachments 8.2, 8.3 and 9.3, 9.7, 9.13 and 9.14 of the Final Plan.
	(a)	an explanation of any variations or exemptions granted from a regulatory obligation or requirement during the <i>previous access arrangement period</i> or the <i>current access arrangement period</i> ; and	
	(b)	any compliance <i>audits</i> conducted during the <i>previous access</i> arrangement period or the current access arrangement period.	
5.8	For each <i>step change</i> listed in response to paragraph 5.7, provide in the materials submitted to the <i>AER</i> , with reference to specific clauses of the relevant legislative instrument(s), the:		
	(a)	previous regulatory obligation or requirement, and	
	(b)	how the changed <i>regulatory obligation or requirement</i> is driving the <i>step change</i> .	

Requ	uirem	ent	Response
Cate	gory	specific operating expenditure	
5.9		Il category specific forecasts in forecast operating expenditure de in the materials submitted to the AER:	Please refer to Chapter 8 of the Final Plan and Attachment 8.2 of the Final Plan.
	(a)	a description of the category specific forecast;	
	(b)	the process undertaken to identify and quantify the <i>category specific forecast</i> ,	
	(c)	an explanation of why the efficient costs of the <i>category specific forecast</i> is not provided by other aspects of the <i>operating expenditure</i> forecast including, for example, base <i>operating expenditure</i> , output growth, real price growth or forecast productivity change; and	
	(d)	an explanation of why the category specific forecast is required to contribute to a total <i>forecast operating expenditure</i> that reasonably reflects the criteria set out in r. 91(1) of the <i>NGR</i> .	
6.	Foreca	ast Price Changes	
6.1	mate	tify in the materials submitted to the AER, the labour and erial price changes proposed in the estimation of the forecast ral expenditure and the forecast operating expenditure.	Please refer to Chapter 8 and Chapter 9 of the Final Plan and Attachments 8.1, 8.4 and 9.3 of the Final Plan.
6.2	Provi	de in the materials submitted to the AER:	Please refer to Chapter 8 and Chapter 9 of the Final Plan and Attachments 8.1,
	(a)	the model(s) used to derive and apply all price changes assumed in the estimation of the <i>forecast capital expenditure</i> proposal and the <i>forecast operating expenditure proposal</i> , including any proprietary model(s) provided by a <i>third party</i> ,	8.5, 9.3 and 9.6 of the Final Plan.
	(b)	in relation to labour escalators, a copy of the current Enterprise Agreement or equivalent agreement; and	
	(c)	evidence that the price measures explain those cost changes which are attributed to price changes, including evidence of	

Req	uirem	ent	Response	
		any materials price forecast method which explains the historical change in the price of materials purchased by network <i>service providers</i> .		
6.3	Expla	in in the materials submitted to the AER:	Please refer to Chapter 8 and Chapter 9 of the Final Plan and Attachments 8.1,	
	(a)	the methodology underlying the calculation of each price change, including sources, data conversions, the operation of any models provided under paragraph 6.2(a) and the use of any assumptions, such as lags or productivity gains;	8.4 and 9.3 of the Final Plan.	
	(b)	whether the same price changes have been used in developing both <i>the forecast capital expenditure</i> and <i>forecast operating expenditure</i> ; and		
	(c)	if the response to paragraph 6.3(b) is no, why it is appropriate for different expenditure escalators to apply.		
6.4	expir mate	agreement provided in response to paragraph 6.2(b) is due to e during the <i>next access arrangement period</i> , explain in the rials submitted to the <i>AER</i> the progress and outcomes of any tiations to date to review and replace the current agreement.	Not applicable	
7.	Intera	ctions between Capex and Opex		
7.1	intera	rify in the materials submitted to the AER any material actions between the pipeline service provider's forecast capital and iture and forecast operating expenditure.	Please refer to Chapters 8 and 9 of the Final Plan.	
7.2	intera forec	nin in the materials submitted to the <i>AER</i> how these actions have been taken into account when developing asts of <i>capital expenditure</i> and <i>operating expenditure</i> , and twise in providing responses to items under paragraphs 5 and	Please refer to Chapters 8 and 9 of the Final Plan.	

2.3 Capital Base and Tax Reporting

Req	uirement	Response
8.	Capital Base	
8.1	Provide the <i>pipeline service provider's</i> calculation of the <i>capital base</i> using the <i>AER's RFM</i> and <i>PTRM</i> which are to be submitted as part of the <i>access arrangement proposal</i> , including the <i>pipeline service provider's</i> calculation of the opening and closing <i>capital base</i> for each <i>regulatory year</i> of the <i>current access arrangement period</i> and <i>next access arrangement period</i> .	Please refer to Attachments 1.5 and 1.6 of the Final Plan.
8.2	Confirm in the materials submitted to the <i>AER</i> that the gross capex and customer contribution values in the <i>AER's RFM</i> and/or <i>PTRM</i> submitted by the <i>pipeline service provider</i> are exclusive of <i>gifted assets</i> consistent with the Full Federal Court of Australia's ruling on 21 October 2020.	We confirm that all capex is exclusive of gifted assets.
8.3	If the <i>pipeline service provider</i> proposes to change the underlying methods in the <i>AER's RFM</i> and/or <i>PTRM</i> compared with the <i>current access arrangement's AER</i> final decision <i>RFM</i> and/or <i>PTRM</i> for the calculation referred to in paragraph 8.1, describe in the materials submitted to the <i>AER</i> the reasons for the changes.	Not applicable
8.4	If the opening value of the <i>capital base</i> as at the start of the <i>next access arrangement period</i> is proposed to be adjusted because of re-use of redundant <i>assets</i> or exclusion of redundant <i>assets</i> , provide details in the materials submitted to the <i>AER</i> including relevant supporting information used to calculate that <i>adjustment</i> value.	Not applicable
9.	Depreciation schedules	

9.1	Provide in the materials submitted to the <i>AER</i> , the <i>pipeline service provider's</i> calculation of the depreciation amounts for the relevant <i>gas distribution network</i> for each <i>regulatory year</i> of:		Please refer to Attachments 1.5 and 1.6 of the Final Plan.
	(a)	the <i>current access arrangement period</i> using the <i>AER's RFM</i> , which is to be submitted as part of the <i>access arrangement proposal</i> ; and	
	(b)	the <i>next access arrangement period</i> using the <i>AER's PTRM,</i> which is to be submitted as part of the <i>access arrangement proposal</i> .	
9.2	If the <i>pipeline service provider</i> proposes to change the underlying depreciation methods in the AER's <i>RFM</i> and <i>PTRM</i> compared with the <i>current access arrangement's AER</i> final decision <i>RFM</i> and <i>PTRM</i> for the calculations referred to in paragraph 9.1, describe in the materials submitted to the <i>AER</i> the reasons for the changes.		Not applicable
9.3	For the standard <i>asset</i> lives applied in the <i>PTRM</i> , identify any changes from the standard <i>asset</i> lives approved in the <i>AER's</i> final decision for the <i>current access arrangement</i> for exisiting <i>asset classes</i> . Explain in the materials submitted to the <i>AER</i> the reason/s for the change and provide relevant supporting information.		Not applicable
9.4	For any proposed new <i>asset classes</i> , explain the reason/s for using these new <i>asset classes</i> and provide in the materials submitted to the <i>AER</i> the relevant supporting information on their proposed standard <i>asset</i> lives.		We have created a new asset class 'Future of Gas' for Future of Gas accelerated depreciation. Please refer to Chapter 6 and Chapter 10 of the Final Plan.
9.5	If existing asset classes approved in the AER's final decision for the current access arrangement are proposed to be removed at the start of the next access arrangement period and their residual values are to be reallocated to other asset classes, explain in the materials submitted to the AER the reason/s for the change and provide relevant supporting information. This should include a demonstration of the materiality of the change on the forecast depreciation allowance.		Not applicable

9.6 Describe in the materials submitted to the AER the method used to Please refer to Chapter 10 of the Final Plan. depreciate existing asset classes as at 1 July 2023 and provide supporting calculations. This may include calculations to estimate remaining asset lives.

9.7 Explain in the materials submitted to the AER the approach the Please refer to Chapter 10 of the Final Plan. pipeline service provider used to forecast its immediate expensing capital expenditure for the next access arrangement period as provided in the access arrangement proposal PTRM.

9.8 The AER's PTRM applies the diminishing value (DV) method for tax Not applicable depreciation purposes to all new depreciable assets except for certain assets. Where the pipeline service provider proposes capital expenditure associated with buildings and in-house software to be exempted from the DV method of tax depreciation, please confirm that the proposal satisfies the following requirements:

- (a) buildings: capital expenditure for buildings may be depreciated using the SL method if it satisfies the definition of a capital work under section 43.20 of the Income Tax Assessment Act 1997 (ITAA); and
- in-house software: capital expenditure for in-house software may be depreciated using the SL method if it satisfies the definition of in-house software under section 995.1 of the ITAA, and may be depreciated using the SL method, consistent with section 40.72 of the ITAA.

10. Corporate Income Tax

10.1 Provide in the materials submitted to the AER the pipeline service Please refer to Chapter 11 of the Final Plan. provider's calculation of the estimated cost of corporate income tax for the next access arrangement period using the AER's PTRM, which is to be submitted as part of the access arrangement proposal.

		Attachment I
10.2	Demonstrate in the materials submitted to the AER that the calculation referred to in paragraph 10.1 complies with r. 87A of the NGR .	Please refer to Chapter 11 of the Final Plan.
10.3	Provide in the materials submitted to the <i>AER</i> the details of each departure from the <i>AER's PTRM</i> for the calculations referred to in paragraph 10.1, and the reasons for that departure.	Not applicable
10.4	Identify in the materials submitted to the <i>AER</i> any changes to standard tax asset lives for existing <i>asset classes</i> approved for the <i>current access arrangement</i> . Explain the reason/s for the change and provide relevant supporting information, including Federal tax laws governing depreciation for tax purposes.	Not applicable
10.5	Describe in the materials submitted to the <i>AER</i> the method used to depreciate existing asset classes as at 1 July 2023 for tax purposes and provide supporting calculations, if the approach differs from that in the <i>current access arrangement's AER</i> final decision <i>RFM</i> .	Not applicable
10.6	Provide in the materials submitted to the AER the pipeline service provider's calculation of the tax asset base for each regulatory year of the current access arrangement period and next access arrangement period using the pipeline service provider's RFM, PTRM and/or separate tax depreciation model.	Please refer to Chapters 10 and 11 of the Final Plan.
10.7	If the <i>pipeline service provider</i> proposes to change the underlying methods in the <i>AER's RFM</i> for the calculations referred to in paragraph 10.6, describe in the materials submitted to the <i>AER</i> the reasons for the changes.	Not applicable
10.8	Identify in the materials submitted to the <i>AER</i> any differences in the <i>capitalisation</i> of expenditure for regulatory accounting purposes and tax accounting purposes. Provide reasons and supporting calculations to reconcile any differences between the two forms of accounts.	Not applicable

2.4 Network Information Reporting

Req	Requirement		Response		
11.	11. Demand				
11.1	Provi	de in the materials submitted to the AER:	Please refer to Chapter 13 and Attachments 13.1-13.3 of the Final Plan.		
	(a)	an explanation of any trends in demand and volumes over the <i>current access arrangement period</i> and the <i>next access</i> <i>arrangement period</i> ;	Please refer to Chapter 8 and 9 of the Final Plan.		
	(b)	details of the key drivers behind the demand forecasts provided in response to <i>Workbook 1 – Reset (forecast) data, regulatory template</i> N1. Demand;			
	(c)	any methodology and models that have been used to develop the demand forecasts;			
	(d)	any data sets used as inputs into the models;			
	(e)	any key inputs and assumptions that have been used in the models (including in relation to economic growth, <i>customer</i> numbers and policy changes) and any associated models or data relevant to justifying these inputs and assumptions and how demand for <i>pipeline services</i> is differentiated;			
	(f)	an explanation of any weather normalisation models used by the <i>pipeline service provider</i> and how weather data has been used, as well as an explanation as to how the <i>pipeline service</i> <i>provider's</i> approach to weather normalisation has changed over time;			
	(g)	an explanation of any appliance models, where used, or assumptions relating to <i>average customer</i> energy usage (by <i>customer</i> type);			
	(h)	how the forecasting methodology used is consistent with, and takes into account, historical observations (where appropriate), including any calibration processes undertaken			

- within the model (specifically whether the load forecast is matched against actual historical load); and
- (i) an explanation of how the demand forecasts have been used to develop the *pipeline service provider's capital expenditure* and *operating expenditure* forecasts.

11.2 Provide in the materials submitted to the AER:

Please refer to Chapter 13 and Attachments 13.1-13.3 of the Final Plan.

- (a) evidence that any independent verifier engaged has examined the reasonableness of the method, processes and assumptions in determining the forecasts and has the requisite expertise to undertake a verification of forecasts; and
- (b) all documentation, analysis and models evidencing the results of the independent verification provided in paragraph 11.2(a).

2.5 Incentive Schemes and other Reporting

Requirement			Response
12.	Propo	osed Incentive Mechanism	
12.1	mec the f	vide in the materials submitted to the <i>AER</i> , for each incentive chanism (including existing incentive mechanisms), details of forecast <i>revenue</i> referable to increments for efficiency gains or rements for efficiency losses for the <i>next access arrangement and</i> .	Please refer to Chapters 12 and 14 of the Final Plan.
12.2	Provide in the materials submitted to the AER, for each proposed incentive mechanism:		Please refer to Chapter 12 of the Final Plan.
	(a)	an explanation of the operation of the proposed incentive mechanism;	
	(b)	an explanation of the rationale for the proposed incentive mechanism;	
	(c)	reference to the source <i>documents</i> used to derive exclusions and inclusions to calculate efficiency gains and losses for the <i>next access arrangement period;</i> and	
	(d)	any relevant analyses or reports that support the proposed incentive mechanism.	
13.	Rate	of Return	
13.1	1 The <i>pipeline service provider</i> is required to apply the binding <i>Rate</i> of <i>Return Instrument</i> (December 2022) for determining the rate of return in its <i>access arrangement proposal</i> .		
13.2	in ac	averaging periods nominated by the <i>pipeline service provider</i> ccordance with the <i>Rate of Return Instrument</i> (December 2022) be kept confidential by the <i>AER</i> .	Please refer to Chapter 11 and Attachment 11.1 of the Final Plan.

13.3 For the purposes of assessing the *pipeline service provider's* Please refer to Chapter 11 and Attachment 11.1 of the Final Plan. proposal we require it to nominate 'placeholder' averaging periods which will be made public and have been used to calculate an indicative rate of return in the pipeline service provider's access arrangement proposal.

2.6 Revenue and Pricing

Requirement		Response			
14. F	14. Revenues and Prices for References Services				
14.1	Provide in the materials submitted to the AER the pipeline service provider's calculation of the unsmoothed and smoothed revenues, and prices for the purposes of the reference tariff variation mechanism proposed by the pipeline service provider for the next access arrangement period using the AER's PTRM.	Please refer to Chapter 14 and Attachments 14.1 and 14.2 of the Final Plan.			
14.2	If the pipeline service provider proposes to change the underlying methods in its access arrangement proposal PTRM compared with the current access arrangement AER final decision PTRM for the calculations referred to paragraph 14.1 describe in the materials submitted to the AER the reasons for the changes.	Not applicable			

15. Tariffs

Total revenue allocation

- 15.1 Provide in the materials submitted to the AER:
 - an explanation, including any relevant calculations, of the methods or principles used to allocate relevant cost between the reference services and non-reference services; and
 - for *rebateable services*, provide:
 - the reasons why the service should be treated as a rebateable service: and

Please refer to Chapter 14 and Attachments 1.5, 14.1 and 14.2 of the Final Plan.

(ii) a description of the mechanism that the *pipeline* service provider will use to apply an appropriate portion of the revenue generated from the sale of rebateable services to price rebates (or refunds) to users of reference services (see r. 93 of the NGR).

Tariffs – distribution pipelines (see r. 94 of the NGR)

- 15.2 For each *tariff* proposed by the *pipeline service provider* for the *next access arrangement period*, and if it consists of two or more charging parameters, each charging parameter for a *tariff class*, provide in the materials submitted to the *AER*:
 - (a) a description of how the *pipeline service provider* has taken into account the long run marginal cost for the *reference service* or, in the case of a charging parameter, for the element of the service to which the charging parameter relates:
 - (b) details of the transaction costs associated with the *tariff* or each charging parameter;
 - (c) whether *customers* belonging to the relevant *tariff class* are able or likely to respond to price signals; and
 - (d) an explanation of the methodology used to allocate costs.

Please refer to Chapter 14 and Attachments 1.5, 14.1 and 14.2 of the Final Plan.

Prudent discounts (see r. 96 of the NGR)

15.3 Identify in the materials submitted to the *AER* all prudent discounts that the *pipeline service provider* proposes for the *next access arrangement period* and the *users* to whom they will apply and explain:

- (a) how each prudent discount is necessary to respond to competition or maintain efficient use of the *pipeline*; and
- (b) whether including relevant calculations, *reference tariffs* would be higher without the prudent discount than they would be with the prudent discount.

Not applicable

16. Reference Tariff Variations

Reference tariff variation mechanism

Please refer to Chapter 14 and Attachments 14.1 and 14.2 of the Final Plan.

- 16.1 Provide in the materials submitted to the AER an explanation of:
 - (a) the proposed *reference tariff variation mechanism* for the *next access arrangement period* and the basis for any parameters used in the mechanism; and
 - (b) the administrative arrangements for periodic reviews of tariffs including the timing of notifications to the *AER*.
- 16.2 Identify in the materials submitted to the AER:

Please refer to Chapter 14 and Attachments 14.1 and 14.2 of the Final Plan.

- the possible effects of the proposed reference tariff variation mechanism on the pipeline service provider's administrative costs and, if known, the administrative costs of users or potential users; and
- (b) all relevant regulatory arrangements the *pipeline service* provider considers applicable to the relevant reference services before the commencement of the proposed reference tariff variation mechanism.

Cost pass through mechanism

Please refer to Chapter 14 and Attachment 14.1 of the Final Plan.

- 16.3 For each cost pass through event in the *pipeline service provider's* access arrangement proposal, provide in the materials submitted to the AFR:
 - (a) a definition and description of the cost pass through event;
 - (b) an explanation of how the cost pass through event is uncontrollable;
 - (c) an explanation of whether the costs of the cost pass through event are already provided for through the *operating expenditure* or *capital expenditure* forecasts, the WACC (i.e. events which affect the market generally, are systemic risks

- and already compensated through the WACC), or any other mechanism or allowance; and
- (d) an explanation of the administrative arrangements for the cost pass through event and their relationship to other periodic reviews for other *tariff* variation mechanisms including the timing of notifications to the *AER*.
- 16.4 Identify in the materials submitted to the AER:
 - (a) the materiality threshold the *pipeline service provider* proposes for cost pass through events;
 - (b) the possible effects of the proposed cost pass through mechanism on the *pipeline service provider's* administrative costs and, if known, the administrative costs of *users* or potential *users*; and
 - (c) all relevant regulatory arrangements the *pipeline service* provider considers applicable to the relevant reference services prior to the commencement of the proposed cost pass through mechanism.

Please refer Chapter 14 and Attachment 14.1 of the Final Plan.

17. Non-tariff Components

Non-tariff terms and conditions

17.1 Provide in the materials submitted to the AER:

- (a) details of any amendments to the non-tariff terms and conditions of the *access arrangement* that the *pipeline service provider* proposes for the *next access arrangement period*; and
- (b) for each amendment identified in paragraph 17.1(a), explain the reasons for the proposed amendment.

Please refer to Attachments 15.1 and 15.2 of the Final Plan.

Queuing requirements

17.2 Provide in the materials submitted to the *AER* details of the process or mechanism for determining the order of priority for spare or

Clause 7.2 of the 2023-28 AA Document deals with the matter of Queuing, which also refers to rule 103 of the National Gas Rules.

developable capacity, for example, whether it is to be on a firstcome-first-served basis or by auction.

Capacity trading requirements

17.3 Identify in the materials submitted to the AER the rules or procedures the pipeline service provider must accord with under r. 105 of the NGR.

Refer Section 7 of the 2023-28 AA document. These are consistent with rule 105 of the National Gas Rules.

Extension and expansion requirements (see r. 104 of the NGR)

- 17.4 Provide in the materials submitted to the AER:
 - details of any extension and expansion requirements where that extension and expansion requirement states that the access arrangement will apply to incremental services to be provided as a result of the extension or expansion; and
 - details of the effect of those extension or expansion requirements identified in paragraph 17.4(a) on tariffs.

- (a) Refer to section 8 of the 2023-28 AA Document, which deals with extension and expansion requirements.
- (b) In accordance with section 8.3 of the 2023-28 AA, it the AA applies to an incremental service to be provided as a result of any extension or expansion then the Reference Tariffs will apply to incremental services which are Reference Services.

Change of receipt or delivery point by user

- 17.5 Explain in the materials submitted to the AER:
 - how users may obtain consent, including identifying any relevant conditions, to change receipt or delivery points as contemplated under r. 106 of the NGR; and
 - where relevant, the technical or commercial considerations and other relevant conditions in the event the pipeline service provider intends to withhold consent to a change in a receipt or delivery point.

(a) Clause 7.3 of the 2023-28 AA Document explains how AGN's users may obtain consent, including identifying any relevant conditions, to change receipt or delivery points as contemplated under r. 106.

18. Indicative Impact on Customer Gas Bills

If the *pipeline service provider* proposes an alternative method Not applicable 18.1 to estimate the impact of its *proposal* on typical *customer* bills (other than that set out in Workbook 4 – Indicative bill impact), provide in the materials submitted to the AER the alternative

calculations, and describe the method and underlying assumptions used.

2.7 Miscellaneous Reporting

Requ	uirem	ent	Response
19.	Relate	ed Party Transactions	
19.1		tify and describe in the materials submitted to the AER all ies which:	AGN does not have any related parties.
		are a <i>related party</i> to the <i>pipeline service provider</i> and contribute to the provision of <i>pipeline services</i> ; or	
		have the capacity to determine the outcome of decisions about the <i>pipeline service provider's</i> financial and operating policies.	
		minimum threshold for these entities are for transactions ter than \$1,000,000 in a <i>regulatory year</i> .	
19.2	2 Provide in the materials submitted to the <i>AER</i> a diagram of the organisational structure depicting the relationships between all the entities identified in the response to paragraph 19.1.		Not applicable
19.3	Iden	tify in the materials submitted to the AER:	Not applicable
	(a)	all arrangements or <i>contracts</i> between the <i>pipeline service provider</i> and any of the other entities identified in the response to paragraph 19.1 currently in place or expected to be in place during the period 2019-20 to 2025-26 which relate directly or indirectly to the provision of <i>pipeline services</i> ; and	
	(b)	the service or services that are the subject of each arrangement or contract.	
19.4	For e	each service identified in the response to paragraph 19.3(b):	Not applicable

- provide in the materials submitted to the AER: (a)
 - a description of the process used to procure the service; and
 - supporting documentation including, but not limited to, requests for tender, tender submissions, internal committee papers evaluating the tenders, contracts between the *pipeline service provider* and the relevant provider.
- explain in the materials submitted to the AER:
 - why that service is the subject of an arrangement or contract (i.e. why it is outsourced) instead of being undertaken by the *pipeline service provider* itself;
 - whether the services procured were provided under a standalone *contract* or provided as part of a broader operational agreement (or similar);
 - whether the services were procured on a genuinely competitive basis and if not, why; and
 - (iv) whether the service (or any component thereof) was further outsourced to another provider.
- 19.5 For each arrangement or contract identified in the response to Not applicable paragraph 19.3 provide in the materials submitted to the AER:

- a copy of the arrangement or contract which sets out the obligations of both the other entity and the pipeline service provider,
- a breakdown of all services provided as part of that arrangement or contract;
- a breakdown of costs for each service provided as part of the arrangement or contract, including separately identifying overheads, any profit margin or management fee and incentive payments;

- (d) a breakdown of all costs included in the contract price; and
- (e) any methodologies, including consultant's reports, or assumptions used to determine components of those costs included in the contract price.

2.8 Other Information

Requirement	Response
20. Compliance with Section 269A of the NGL	

- 20.1 The *pipeline service provider* must provide a statement attesting Not applicable that:
 - (a) where any expenditure or cost has been incurred or is forecast to be incurred by the *pipeline service provider*, as a result of or incidental to a review under Part 5 – Merits review and other non-judicial review – of the *NGL*, that;
 - (i) the *pipeline service provider* has not included any of that expenditure or cost, or any part of that expenditure or cost, in its capital or *operating expenditures* for an *access arrangement* decision; and
 - the pipeline service provider has not recovered any of that expenditure or cost, or any part of that expenditure or cost, from end users; and
 - (iii) the pipeline service provider has not sought to pass through any of that expenditure or cost, or any part of that expenditure or cost, to end users; or
 - (b) where no expenditure or cost has been incurred or is forecast to be incurred by the *pipeline service provider*, as a result of or incidental to a review under Part 5 – Merits review and other non-judicial review – of the *NGL*, that;
 - no such expenditure or cost has been incurred or is forecast to be incurred.

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Attachment 1

21. Identification of Certain Costs in Actual Capex and Opex

21.1 For any actual *capital expenditure* or *operating expenditure* reported in response to this *notice*, identify any part of that expenditure which can be attributed to any expenditure or cost that the *pipeline service provider* has incurred as a result of, or incidental to, a review under Part 5 – *Merits review and other non-judicial review* – of the *NGL*.

Not applicable

3. Schedule 3 – Historical Information

Requ	uirem	ent		Response	
1. P	Provide	Histo	rical Financial Information		
1.1		the capi	eviously provided to the AER, provide in the materials to the AER: regulatory accounting principles and policies and the italisation policy for the relevant regulatory year; cost allocation methodology for the relevant regulatory year; atement of policy for determining: the allocation of costs for the relevant regulatory year; and the allocation of overheads for the relevant regulatory year.	 (a) AGN previously supplied the regulatory accounting principles and policies (Attachment 13) and the capitalisation policy (Attachment 15) as part of the submission of the Annual RIN (for initial regulatory years 2011 to 2019) on 31 March 2021. (b) AGN previously supplied the cost allocation methodology (CAM) (Attachment 14) as part of the submission of the Annual RIN (for initial regulatory years 2011 to 2019) on 31 March 2021. (c) All costs that are allocated to AGN Victoria and Albury and to its pipeline services are performed in accordance with the AGN Limited cost allocation methodologies. (i) All allocated costs are relevant to each regulatory year with appropriate external audit procedures performed over these costs and in accordance with the RIN requirements. (ii) AGN Limited allocates overheads directly to its pipeline services and where it cannot, a causal driver is used to allocate these costs. 	
1.2	to paragraph 1.1(c) compared to the previous <i>regulatory year</i> . For each change identified: (a) explain the nature of and the reasons for the change; and		ph 1.1(c) compared to the previous <i>regulatory year</i> . For ge identified:	There have been no material changes to the methodology for the allocation of costs from a regulatory perspective within the current access arrangement period. However, please refer to Appendix F in the Basis of Preparation (RIN	
	(0)		he relevant <i>regulatory year</i> .	Attachment 2) that accompanied the 2021 AGN Vic and Albury Annual RIN for AGN's cost allocators for 2021 and their amounts.	
2. C	Complia	ance w	vith Current Access Arrangement		
Cost	t pass	throu	ugh	Please refer to clause 4.5 of the 2023-28 AA Document for the cost- passthrough procedure	

- 2.1 Describe in the materials submitted to the *AER* the processes and *procedures* the *pipeline service provider* has in place to:
 - (a) identify negative cost pass through events under the *current* access arrangement, and
 - (b) determine the materiality (as defined in clause 3.4 (c) of the *current access arrangement)* of cost decreases.

Tariff class assignment

- Identify in the materials submitted to the AER each refusal the pipeline service provider has made during the relevant regulatory year to assign a user to the tariff class nominated by a user or prospective user in its request for service under the current access arrangement including:
 - (a) the name of the *user* or prospective *user*,
 - (b) the date upon which the request was made; and
 - (c) the date upon which the *pipeline service provider* responded to the request.

Not applicable

Tariff class re-assignment

2.3 Describe in the materials submitted to the *AER* the processes and *procedures* the *pipeline service provider* has in place to determine if the withdrawal of a *tariff class* and/or re-assignment of a *delivery point* to a different *tariff class* under the *current access arrangement* is necessary.

Please refer to clause 2.3.3 of the 2023-28 AA Document for the reclassification procedure.

- 2.4 Identify in the materials submitted to the *AER* each withdrawal of a *tariff class* and/or *delivery point* re-assignment the *pipeline service provider* has made during the *relevant regulatory year* under the *current access arrangement* including:
 - (a) the name of the tariff class or delivery point;
 - (b) the date upon which the withdrawal or re-assignment occurred;

Not applicable

- (c) how many *users* were affected by the withdrawal or reassignment; and
- (d) the reason for each withdrawal or re-assignment (including reassignment at the users request)
- 2.5 Describe in the materials submitted to the AER the processes and procedures the pipeline service provider has in place to determine if the re-assignment of a tariff class to a delivery point requested by a user under the current access arrangement is necessary.

Please refer to clause 2.3.3 of the 2023-28 AA Document for the reclassification procedure.

2.6 Identify in the materials submitted to the *AER* each tariff reassignment the *pipeline service provider* has made during the *relevant regulatory year* under the *current access arrangement* including:

Not applicable

- (a) the name of the user who made the request;
- (b) the date upon which the request was made; and
- (c) whether the pipeline service provider agreed to the request.

3. Cost Allocation to the Pipeline Service Provider

- 3.1 Identify in the materials submitted to the *AER* each item in the Not applicable *regulatory templates* that is:
 - (a) not allocated on a *directly attributable* basis but is allocated on a causation basis to the *pipeline service provider*, or
 - (b) not allocated on a *directly attributable* basis and cannot be allocated on a causation basis to the *pipeline service provider*.
- 3.2 For each item identified in the response to paragraph 3.1(a):

Not applicable

- (a) state the amount of the item that has been allocated to the *pipeline service provider*;
- (b) explain the method of allocation and reasons for choosing that method; and
- (c) state the amount of each allocator used; and

			Attachment 1
	(d)	explain the reason(s) why it cannot be directly attributed.	
3.3	For each item identified in the response to paragraph 3.1(b):		AGN Limited does not have any costs that are not otherwise allocated on a
	(a)	state the amount that has been allocated to the <i>pipeline service</i> provider and whether it was material;	causation basis.
	(b)	explain the method of allocation and reasons for choosing that method; and $% \left(1\right) =\left(1\right) \left(1\right)$	
	(c)	explain the reason(s) why it cannot be allocated on a causation basis.	
4. C	ost Allo	ocation to Pipeline Services	
		ne services refers to haulage reference services, ancillary ervices, other reference services and non–reference services.	The amount of any item that has been allocated to AGN (AGN Victoria and Albury) pipeline services is reported in Workbook 2 – Historical against the
4.1	Identify each item in the <i>regulatory templates</i> attached at Appendix A that is:		relevant category or sub-category of expenditure for which costs are allocated on a causation basis.
	(a)	directly attributable to a pipeline service;	
	(b)	not <i>directly attributable</i> but is allocated on a <i>causation basis</i> to a pipeline service;	
	(c)	not <i>directly attributable</i> and cannot be allocated on a <i>causation basis</i> to a pipeline service.	
4.2		each item identified in response to paragraph 4.1(a), state the unt of the item that is <i>directly attributable</i> to each <i>pipeline service</i> .	The amount of each item directly attributable to each pipeline services is reported in Workbook 2 – Historical.
4.3	For e	each item identified in the response to paragraph 4.1(b):	The amount of any item that has been allocated to AGN (AGN Victoria and
	(a)	state the amount of the item that has been allocated to each pipeline service;	Albury's) pipeline services is reported in Workbook 2 – Historical against the relevant category or sub-category of expenditure for which costs are allocated on a causation basis.
	(b)	explain the method of allocation and reasons for choosing that method; and $% \left(1\right) =\left(1\right) \left(1\right) $	
	(c)	state the amount of each allocator used; and	AGN Limited does not have any costs that are not otherwise allocated on a causation basis.
	(4)	avalain valve it apparet ha discatly attributed	oddoddor bdolo.

(d) explain why it cannot be directly attributed.

- 4.4 For each item identified in the response to paragraph 4.1(c):
 - (a) state the amount of the item that has been allocated to each *pipeline service* and whether it was *material*;
 - (b) explain the method of allocation and reasons for choosing that method; and
 - (c) explain the reason(s) why it cannot be allocated on a *causation* basis.

AGN Limited does not have any costs that are not otherwise allocated on a causation basis.

4. Schedule 4 – Prepare and Maintain Information

Req	Requirement			Response
1.	Prep	are In	formation	
1.1	manr		e Microsoft Excel Workbooks attached at Appendix A in the d form specified in the worksheets therein and in accordance otice.	AGN has completed all workbooks as required. Refer to the relevant documents, RIN Attachments 3 – 15.
1.2	For information other than <i>forecast information</i> , prepare a <i>basis of preparation</i> in accordance with the requirements specified in Schedules 1, 2 and 3. The <i>basis of preparation</i> must:			AGN has prepared a separate Basis of Preparation document (Please refer to RIN Attachment 2) explaining the source of information, assumptions and methodology used to populate the historical data templates. It also
	(a)		nonstrate how the information provided is consistent with the uirements of this notice;	explains whether the data reported in 'actual information' or 'estimated information' using AGN's best estimates. Where AGN believes the data is not applicable, a "NULL" response is input as well as an explanation.
	(b)		ain the source from which the <i>pipeline service provider</i> ained the information provided;	not applicable, a NOLL response is input as well as all explanation.
	(c)	prov	ain the methodology the <i>pipeline service provider</i> applied to vide the required information, including any assumptions the <i>eline service provider</i> made; and	
	(d)	canr	ain, in circumstances where the <i>pipeline service provider</i> not provide input for a variable using <i>actual information</i> and refore must provide input using <i>estimated information</i> :	
		(i)	why an estimate was required, including why it was not possible for the <i>pipeline service provider</i> to use <i>actual information</i> ; and	
		(ii)	the basis for the estimate, including the approach used, assumptions made and reasons why the estimate has been arrived on a reasonable basis and is the <i>pipeline service provider's</i> best estimate possible in the circumstances; and	
	(e)	-	ain, in circumstances where the <i>pipeline service</i> provider vides a "NULL" response as an input for a variable:	

(i) why the pipeline service provider believes the variable is not applicable for the pipeline service provider.

- Prepare all information required under this *notice* in a manner and form:
 - that is in accordance with the requirements at Schedules 1, 2 and 3 which:
 - (i) is in an electronic format;
 - includes any underlying calculations and formulae;
 - is not password protected; (iii)
 - where relevant, allows for precedents and dependants to be traced; and
 - is fully searchable, in text readable format and is capable of text selection and a 'copy and paste' function being applied to it (we prefer that all files be provided in Microsoft Word or PDF; templates must be in Microsoft Excel) and
 - that is readily available for inspection by, or submission to, the AER.
- Prepare, using a person(s) who satisfies the requirements of paragraph 2 of Appendix C, an audit opinion report and review conclusion statement(s) (as applicable) in accordance with the requirements of this notice.

AGN has engaged an appropriate auditor to audit/review the RIN responses as required. Please refer to the RIN Attachment 19 to 20.

AGN has prepared all information required by the notice as explained

through this document.

Maintain Information

The pipeline service provider must maintain all information prepared AGN has kept complete records of all information prepared in this RIN under this Schedule 4, for at least 7 years from the date of the response. submission.

5. Appendix E

5.1 Part A: General

Red	Requirement R		Response	
Ger	neral			
1.1	The f (a) (b) (c) (d)	be derived from the <i>audited statutory accounts</i> ; be verifiable by reference to the audited statutory accounts; be prepared using the accrual basis of accounting; report the substance, over the form, of a transaction, taking into account all aspects, implications and expectations of and motivations for the transaction and that a group or series of transactions that achieves, or is designed to achieve, an overall commercial effect shall be viewed in aggregate; only include costs that are incurred in or relate to the provision	Workbook 2 – Historical (RIN Attachments 5 to 10) has been prepared in accordance with the requirements listed in 1.1 (c) to (j). In relation to 1.1 (a) and (b), audited financial statements are prepared for the consolidated entity consisting of AGN Limited and its subsidiaries. Actual capital expenditure for AGN Victoria and Albury as reported in Workbook 2 – Historical has been sourced from the General Ledgers for AGN Victoria and Albury which contain the relevant account balances that are included in the consolidated Audited Statutory Accounts for AGN Limited. Also refer to Appendix A and B of the Basis of Preparation (RIN Attachment 2) to understand the cost collection and reporting process for	
	(f)	of pipeline services; be presented on a fair and consistent basis, from the accounting records that underlie the costs, revenue, assets employed and liabilities that may be reasonably attributed to the pipeline service provider;	Capex and related Overheads.	
with the general rules and format, and use the accoun	in so far as is reasonably practicable, be prepared in accordance with the general rules and format, and use the accounting principles and policies applicable to the audited statutory accounts except as otherwise required by this notice;			
	(h)	be presented in an understandable manner, without sacrificing relevance or reliability;		
	(i)	state fairly the financial position of the pipeline service provider; and		
	(j)	unless otherwise specified, not be adjusted for inflation.		

Req	uiren	nent	Response	
1.2	Provi (a) (b)	whether the information on a regulatory year basis and set out: whether the information provided is actual information, estimated information or forecast information. For information which is forecast or estimated provide the basis of the forecast or estimate information in the basis of preparation; the units of measurement for parameters or values used to	Workbook 2 – Historical (RIN Attachments 5 to 10) has been prepared in accordance with the requirements listed in 1.2 (a) to (c)	
	(c)	derive or infer values; and whether the information is expressed in nominal, real or another basis and include the base year of information where relevant.		
11.3	(a) (b) (c) (d) (e) (f)	on a regulatory year basis, unless otherwise specified; actual or estimated financial information for the first four years of the current access arrangement period, with estimated financial information only included in the regulatory templates where the pipeline service provider certifies that it is not possible to provide actual historical information; forecast financial information for year five of the current access arrangement period, to be updated with actual information when that becomes available during the review; forecast information as appropriate for the 6 month period 1 January to 30 June 2023; forecast financial information for the next access arrangement period; and where required, actual financial information for the five years of the previous access arrangement period.	Workbook 2 – Historical (RIN Attachments 5 to 10) has been prepared in accordance with the requirements listed in 1.3 (a) to (f) as applicable to actual or estimated information. The financial information provided in Workbook 2 does not contain any forecast information for the current access arrangement period. Information provided in Workbook 1 contains only forecast financial information for the next access arrangement period as required in 1.3 (e)	
1.4		xpenditure forecasts provided to the AER in response to this e must be in real June 2023 dollars, unless specified otherwise.	AGN has complied with these requirements	

Red	quiren	nent	Response
1.5	provi 2023	expenditure forecasts for the next access arrangement period ided to the AER in response to this notice must be in real June is dollars and on a regulatory year basis, unless specified rwise.	AGN has complied with these requirements.
1.6	All historical financial information provided to the AER in response to this notice must be in nominal dollars, unless specified otherwise.		All financial information provided in Workbook 2 – Historical is expressed in nominal dollars for the year in which the expenditure was incurred.
1.7	nomi	ide any calculations used to convert real to nominal dollars or inal to real dollars for the purposes of providing the information ired under paragraphs 1.2 and 1.3 above.	Please refer to Attachments 8.1 and 9.3 of the Final Plan.
1.8		pipeline service provider must for the Microsoft Excel Workbooks ched at Appendix A:	AGN has prepared all the workbooks required by the Notice, marked confidential information appropriately and complied with the naming
	(a)	complete and submit the workbooks and ensure they contain all information required by the <i>notice</i> . The file name for each of these workbooks is to contain the words 'Consolidated Information';	conventions.
	(b)	highlight all information that is subject to a confidentiality claim in each workbook using the confidentiality macro in the workbook. The file name for each of these workbooks is to contain the word 'Confidential';	
	(c)	copy all actual historical information into a new workbook. The file name for this workbooks is to contain the words 'Actual Information';	
	(d)	copy all estimated historical information into a new workbook. The file name for this workbooks is to contain the words 'Estimated Information'; and	
	(e)	prepare a public version of the consolidated version of each workbook.	

Reconciliation

Rec	uiren	ment	Response
1.9	 .9 Where historical information provided in the regulatory templates has previously been reported to the AER: (a) this information must reconcile with the previously provided information; or 		The reported direct expenditure for E4. Meter Replacement and E5. Connections and Customer Contributions (and a lesser degree, E13. Other Capex) for 2017 in Workbook 2 – Historical varies to the previously reported Annual RIN as set out above in Schedule 1, 3.1, Resubmission of information.
	(b)	explain why the information does not reconcile with the previously provided information.	The reduction and the opposing increase of approximately +/-\$200k is reflected in the Direct Contractor expenditure tables of E4. and E5. (and Direct Contractor expenditure E13.) and Capital Contributions in E5.
			This is the result of an incorrect allocation of a capex project.
			AGN are re-submitting Workbook 1 Historical Performance Data 2011-2017 to reflect this change as noted above in 3.1, Resubmission of Information. Please also refer Attachment 16.
1.10	the r	tal expenditure and operating expenditure forecasts provided in regulatory templates must be reconciled to the ex-ante capital and ating allowances in PTRM for the next access arrangement period.	AGN has complied with these requirements.
1.11	pipel pipel infor must level	al capital and operating expenditure must be reconciled to the line service provider's audited statutory accounts. Where the line service provider is part of a corporate group that reports this mation at the corporate group level, the pipeline service provider t reconcile to the information reported at the corporate group. Where reconciliation is at the corporate group level the pipeline ice provider must:	In relation to 1.11 amounts reported in Workbook 2 – Historical have been sourced from and reconciled to the General Ledgers for AGN Victoria and AGN Albury which contain the relevant account balances that are included in the consolidated Audited Statutory Accounts for AGN Limited. Further, AGN has reconciled capex reported in Workbook 2 – Historical for AGN Victoria and AGN Albury to the additions in its AGN Victoria and AGN
	 (a) allocate statutory reported expenditures to the pipeline service provider and indicate the method of allocation; 	Albury fixed assets registers and to related movements in Property, Plant & Equipment in the Audited Statutory Accounts.	
	(b)	show calculations for any allocation; and	AGN's processes for directly attributing or allocating expenditures, are set out in the CAM (Attachment 14) which was provided as part of the
	(c)	indicate where any changes in allocation method or calculations have occurred in relation to the historical data and how these changes have been adjusted for in the use of the data.	submission of the Annual RIN (for initial regulatory years 2011 to 2019) on 31 March 2021.

Red	quirement	Response
		In addition to the CAM, the Basis of Preparation (RIN Attachment 2) provides explanations for cost capture and reporting processes associated with Capex and Overheads within the Appendices of that document.
		Further, the AGN Capitalisation Policy and Regulatory Accounting Principles and Policies documents (both provided as part of the submission of the Annual RIN (for initial regulatory years 2011 to 2019) on 31 March 2021) explain how certain expenditures may be allocated between Capex and Opex for regulatory purposes and the background or historical decisions that led to those policies.
		The information reported in Workbook 2 – Historical reflects the allocation methods that were in place for the period 2017 -2021. Therefore, in relation to 1.11 (c), there has been no retrospective adjustments made for any changes to allocation methods, in the use of the historical data.
1.12	Expenditure should only be reported once across the regulatory templates. Expenditure that may be allocated across multiple regulatory templates, including between capital expenditure purposes, between operating expenditure categories or between capital expenditure purposes and operating expenditure categories, should be allocated to the regulatory template that it most closely relates to in the pipeline service provider's audited statutory accounts.	AGN has complied with these requirements.
1.13	Where expenditure is recovered under another building block component allowances (e.g. cost of capital transaction costs) that could be classified as either operating expenditure or capital expenditure in regulatory or audited statutory accounts, demonstrate that this expenditure is only recovered once in the forecast total regulatory expenditure.	Please refer to Attachments 8.1 and 9.3 of the Final Plan.

		Attacilileii		
Rec	quirement	Response		
1.14	The pipeline service provider must explain the basis upon which the pipeline service provider prepared information to populate the input cells (basis of preparation) for all information (other than forecast information) in the regulatory templates.	AGN has prepared a separate basis of preparation document for the historical information submitted in the templates. Please refer to RIN Attachment 2.		
1.15	The basis of preparation must be a separate document (or documents) that the pipeline service provider submits with its completed regulatory templates.	AGN has prepared a separate basis of preparation document for the historical information submitted in the templates. Please refer to RIN Attachment 2.		
1.16	The basis of preparation must follow a logical structure that enables auditors, assurance practitioners and the AER to clearly understand how the pipeline service provider has complied with the requirements of this notice.	AGN's Basis of Preparation document is structured using the same logical structure required by the RIN. Please refer to RIN Attachment 2.		
1.17	At a minimum, the basis of preparation must meet the requirements of Schedule 4, paragraph 1.2.	AGN's Basis of Preparation meets these requirements. Please refer to RIN Attachment 2.		
1.18	The pipeline service provider may provide additional detail beyond the minimum requirements if the pipeline service provider considers it may assist a user to gain an understanding of the information presented in the regulatory templates.	AGN has provided further explanation in the Basis of Preparation document where it was needed. Please refer to RIN Attachment 2.		
1.19	When reporting an audit opinion report, review conclusion statement or making an attestation report on the regulatory templates presented by the pipeline service provider, an auditor or assurance practitioner shall opine or attest by reference to this notice and the pipeline service provider's basis of preparation.	The auditor engaged by AGN has attested reference to the Basis of Preparation in its audit opinions. Please refer to RIN Attachment 19 and 20.		
Con	npleting Workbooks			
Entry of variablesVariables in yellow cells1.20 Cells coloured yellow require input. If a yellow cell is not applicable to the pipeline service provider the cell will be left blank as a "NULL"		AGN has completed all yellow cells in the templates. Where AGN was not able to complete templates that were not relevant or not applicable, the reasons for not providing the yellow cells has been explained in the Basis of Preparation.		

Requi	iren	nent	Response	
		onse. If the pipeline service provider wants to input a zero value, nput will be "0".		
Variab	oles i	in grey cells	AGN has not populated any grey cells.	
tl	he p	coloured grey do not require input and must not be amended by sipeline service provider. These cells either are not relevant to the ine service provider or contain formulae.		
Nume	rical	l inputs	AGN has reported on a one for one basis in the units required.	
		mounts are to be unrounded and reported on a one for one basis: is 1000 is to be entered as '1000', not '1' or '0.001'.		
Ident	ifica	ation of confidential information	AGN has completed the workbooks as required and marked the	
	1.23 In respect of the regulatory templates, the pipeline service provider must:		confidential information appropriately. Please refer to relevant workbook attached.	
(;	a)	complete the applicable Microsoft Excel Workbooks attached at Appendix A;		
(1	b)	highlight all information that is subject to a confidentiality claim using the confidentiality macro in the workbooks;		
((c)	prepare a public version of the workbooks that may be published by the AER;		
(0	d)	submit all Microsoft Excel Worksheets to us.		
1.24 In respect of all other information provided in response to this notice, the pipeline service provider must:			AGN has for all other information provided in response to this RIN, marked confidential information that is subject to a confidentiality claim	
((a)	highlight all information that is subject to a confidentiality claim so that it can be clearly identified in print and electronic versions of the document; and	(Please refer to RIN Attachment 18) and prepared public versions of the workbooks (Please refer to relevant workbooks attached).	
(1	(b)	prepare a public version of the workbooks or documents that may be published by the AER.		

5.2 Part B: Instructions - Workbook 1 and Workbook 2

Requirement	Response
Cost Allocation Principles	
1.1 All costs that relate to or are incurred in the provision of <i>reference services</i> in the <i>audited statutory accounts</i> must be allocated to the <i>pipeline service provider</i> in accordance with paragraph 3.2 of Schedule 3.	AGN has complied with this requirement.
1.2 A cost allocated to the <i>pipeline service provider</i> in response to paragraph 3.1 of Schedule 3, that is:	AGN has complied with this requirement.
(a) directly attributable to the pipeline service provider, is to be allocated to the pipeline service provider on that basis; or	
(b) not <i>directly attributable</i> to the <i>pipeline service provider</i> is to be allocated on a causation basis, unless the item is not <i>material</i> , using an appropriate allocator, and explained in accordance with paragraph 3.2 of Schedule 3.	
1.3 Capital expenditure items are to be allocated to a capital expenditure purpose on a directly attributable basis or a causation basis using an appropriate allocator. Where this is not possible the capital expenditure is to be allocated using an appropriate allocator, and explained in accordance with paragraph 3.2 of Schedule 3.	AGN has complied with this requirement.
1.4 Operating expenditure items are to be allocated to an activity area on a directly attributable basis or a causation basis using an appropriate allocator. Where this is not possible the operating expenditure is to be allocated using an appropriate allocator, and explained in accordance with paragraph 3.2 of Schedule 3.	AGN has complied with this requirement.
Capital Base	
1.5 General:	Refer Chapter 10 of the Final Plan

Requirement Response

- (a) Asset revaluations or adjustments for impairment (whether increasing or decreasing asset values) are not permitted unless agreed to or required by the AER.
- (b) Revaluations or *adjustments* for impairment (whether increasing or decreasing *asset* values) made in the *audited statutory accounts* must not be made in the *regulatory templates*.
- (c) Capital expenditure must be allocated to a regulatory asset class and must not be shown under a work-in-progress heading.
- (d) Goodwill and any related impairments must not be included in the *regulatory templates*.

Customer and Government Contributions

1.6 Customer contributions and government contributions treated as *revenues* in the audited statutory accounts and included in the value of assets must not be carried forward into the capital base, unless the *AER* has included the *capital contributions* in a final decision *of the pipeline service provider's capital base*.

AGN has complied with this requirement

Expenditure Summary

- 2.1 *Workbook 1 Reset (forecast) data regulatory template* E1. Expenditure Summary instructions:
- (a) In table E1.1.1 for each *regulatory year*, the *capital expenditure* reported for each *capital expenditure purpose is to be:*
 - (i) For mains replacement capital expenditure the total of:
 - A. the *capital expenditure* reported in *regulatory template* E2.

 Mains Repex Table E2.1.1A, Table E2.1.1B, Table E2.1.1C and Table E2.1.1E; and
 - B. the capital expenditure reported in regulatory template E2.

 Mains Repex Table E2.1.2A, Table E2.1.2B, Table E2.1.2C and Table E2.1.2E.

AGN has complied with this requirement.

Please refer to RIN Attachments 3 and 4.

Please note for (a) (viii) ICT Capital Expenditure is equal to:

A. the capital expenditure reported in regulatory template E12. ICT – Table E12.1A, Table E12.1B, Table E12.1C, Table E12.1D and Table E12.1E.

Table E12.1D now labelled "Other Direct Expenditure" includes "other" non-labour internal expenditure that is not categorised as contractor or direct materials expenditure. AGN's IT projects do not attract overheads. This is consistent with AGN's CAM.

Requirement Response

- (ii) For mains augmentation capital expenditure the total of:
 - A. the capital expenditure reported in regulatory template E3.

 Mains Augex Table E3.1A, Table E3.1B, Table E3.1C and Table E3.1E.
- (iii) For meter replacement capital expenditure the total of:
 - A. the capital expenditure reported in regulatory template E4. Meter Replacement Table E4.1.1A, Table E4.1.1B, Table E4.1.1C and Table E4.1.1E;
 - B. the capital expenditure reported in regulatory template E4. Meter Replacement Table E4.1.2A, Table E4.1.2B, Table E4.1.2C and Table E4.1.2E;
 - C. the capital expenditure reported in regulatory template E4. Meter Replacement Table E4.1.3A, Table E4.1.3B, Table E4.1.3C and Table E4.1.3E; and
 - D. the capital expenditure reported in regulatory template E4. Meter Replacement Table E4.1.4A, Table E4.1.4B, Table E4.1.4C and Table E4.1.4E.
- (iv) for connections capital expenditure the total of:
 - A. the capital expenditure reported in regulatory template E5. New Connections Table E5.1.1A, Table E5.1.1B, Table E5.1.1C and Table E5.1.1E.
- (v) For telemetry capital expenditure the total of:
 - A. the capital expenditure reported in regulatory template E6. Non-Network Table E6.5.1A, Table E6.5.1B, Table E6.5.1C and Table E6.5.1E. (vi) For capitalised network overheads the capital expenditure reported for reference services in regulatory template E10. Overheads Table E10.1.2.
- (vii) For capitalised corporate overheads the capital expenditure reported for reference services in regulatory template E10. Overheads Table E10.2.2.
- (viii) For ICT capital expenditure the total of:
 - A. the capital expenditure reported in regulatory template E12. ICT Table E12.1A, Table E12.1B, Table E12.1C and Table E12.1E.

Please note for (f) Table E1.4.1 for each regulatory year, there are no *capitalised overheads* for (vi) ICT capital expenditure hence the amount reported in regulatory template E12. ICT – Table E12.1D does not reflect capitalised overheads but relates to non-labour internal expenditure that is not does align to Tables A, B, C or E.

Requirement Response

- (ix) For other capital expenditure the total of:
 - A. the capital expenditure reported in regulatory template E13. Other Capex Table E13.1A, Table E13.1B, Table E13.1C and Table E13.1E.
- (b) In table E1.1.1 for each *regulatory year*, the *capital expenditure* reported in *'capital contributions* included in the above' is the total of:
 - (i) the capital contributions reported in regulatory template E2. Mains Repex Table E2.1.1F and Table E2.1.2F;
 - (ii) the capital contributions reported in regulatory template E3. Mains Augex Table E3.1F;
 - (iii) the capital contributions reported in regulatory template E4. Meter Replacement Table E4.1.1F, Table E4.1.2F, Table E4.1.3F and Table E4.1.4F;
 - (iv) the capital contributions reported in regulatory template E5. New Connections Table E5.1.1F;
 - (v) the capital contributions reported in regulatory template E6. Non-Network Table E6.5.1F:
 - (vi) the capital contributions reported in regulatory template E12. ICT Table E12.1.1F; and
 - (vii) the capital contributions reported in regulatory template E13. Other Capex Table E13.1F.
- (c) In table E1.2.1 for each *regulatory year*, the *reference services operating expenditure* for each *operating expenditure category* is to reconcile with the operating expenditure reported in *regulatory template* E20. Opex Table 20.2.1.
- (d) In table E1.2.2 for each *regulatory year*, the *non-reference services operating expenditure* for each *operating expenditure category* is to reconcile with the operating expenditure reported in *regulatory template* E20. Opex Table 20.2.2.

Requirement Response

- (e) In table E1.3.1 for each *regulatory year*, the *capital contributions* for each *capital expenditure purpose* is to be:
 - (i) for mains replacement capital expenditure, the capital contributions reported in regulatory template E2. Mains Repex Table E2.1.1F and Table E2.1.2F;
 - (ii) for mains augmentation capital expenditure, the capital contributions reported in regulatory template E3. Mains Augex Table E3.1F;
 - (iii) for meter replacement capital expenditure, the capital contributions reported in regulatory template E4. Meter Replacement Table E4.1.1F, Table E4.1.2F, Table E4.1.3F and Table E4.1.4F;
 - (iv) for connections capital expenditure, the capital contributions reported in regulatory template E5. New Connections Table E5.1.1F;
 - (v) for telemetry capital expenditure, the capital contributions reported in regulatory template E6. Non-Network Table E6.5.1F;
 - (vi) for ICT capital expenditure, the capital contributions reported in regulatory template E12. ICT Table E12.1F; and
 - (vii) for other capital expenditure, the capital contributions reported in regulatory template E13. Other Capex Table E13.1F.
- (f) In table E1.4.1 for each regulatory year, the *capitalised overheads* for each *capital expenditure purpose* is to be:
 - (i) for mains replacement capital expenditure, the capitalised overheads reported in regulatory template E2. Mains Repex Table E2.1.1D and Table E2.1.2D;
 - (ii) for mains augmentation capital expenditure, the capitalised overheads reported in regulatory template E3. Mains Augex Table E3.1D;
 - (iii) for meter replacement capital expenditure, the capitalised overheads reported in regulatory template E4. Meter Replacement Table E4.1.1D, Table E4.1.2D, Table E4.1.3D and Table E4.1.4D;
 - (iv) for connections capital expenditure, the capitalised overheads reported in regulatory template E5. New Connections Table E5.1.1D;
 - (v) for telemetry capital expenditure, the capitalised overheads reported in regulatory template E6. Non-Network Table E6.5.1D;

Requirement Response (vi) for ICT capital expenditure, the capitalised overheads reported in regulatory template E12. ICT - Table E12.1D; and (vii) for other capital expenditure, the capitalised overheads reported in regulatory template E13. Other Capex - Table E13.1D. Connections – Capital Expenditure 2.2 Workbook 1 – Reset (forecast) data and Workbook 2 – Historical data, Please refer to Chapter 9 and Attachments 9.3 and 9.6 of the Final Plan. regulatory template E5. New Connections - Table E5.2 instructions: Provide supporting information for the data input into the table Please refer to the Basis of Preparation, RIN attachment 2, for an E5.2.1 Unit rates. For example, if the forecast is based on: explanation of the data contained in Workbook 2 Historical. Contracts - provide documents which show that the contract outcomes are the result of a competitive tender and the contracts which specify the amounts relied upon; Cost build up - provide the excel sheet model with sufficient information that the cost assumptions may be tested. Mains Augmentation – Capital Expenditure 2.3 AGN has complied with these requirements. General: Do not include mains augmentation information relating to connections in this worksheet. Mains augmentation in relation to connections are to be reported in regulatory template E5. New Connections (tables E5.1 and E5.2). AGN has complied with these requirements. Workbook 1 – Reset (forecast) data and Workbook 2 – Historical data, regulatory template E3. Mains Augex - Table E3.1 instructions: List each mains augmentation project for which capital Please note, forecast capital expenditure projects have not yet been expenditure was incurred during the previous or current access assigned an internal identification code. arrangement period or for which capital expenditure is forecast

Requirement Response

to be incurred over the *next access arrangement period*, and the total cumulative *capital expenditure* over the life of the *project* is greater than or equal to \$500,000 (real \$June 2023) in *regulatory template* E3. Mains Augex.

- (b) For each mains augmentation project provided in response to 2.4(a), report the expenditure incurred or forecast to be incurred for each regulatory year in table E3.1; and the length of pipeline added or forecast to be added in table E3.2.
- (c) For each mains augmentation project listed in table E3.1 and E3.2, specify in the materials submitted to the AER or basis of preparation:
 - (i) an *internal identification code*, in order to report actual *capital expenditure* against forecast *capital expenditure*;
 - (ii) the *asset class* to which the *project* belongs. If the *project* has been allocated to multiple *asset classes*, provide the percentage allocations of the *project* to the *asset classes*; and
 - (iii) the project name used internally.
- (d) Provide the total *capital expenditure* for all *mains augmentation projects* in aggregate, for which *capital expenditure* was incurred during the *previous* or *current access arrangement period* or for which *capital expenditure* is forecast to be incurred over the *next access arrangement period*, and the total cumulative *capital expenditure* over the life of each *project* is less than \$500,000 (real \$June 2023).
- (e) Provide the length of pipeline for all *mains augmentation* projects in aggregate, for which capital expenditure was incurred during the previous or current access arrangement period or for which capital expenditure is forecast to be incurred over the next access arrangement period, and the total

Requirement Response

- cumulative *capital expenditure* over the life of each *project* is less than \$500,000 (real \$June 2023).
- (f) The *capital expenditure* included in tables E3.1(A to E) are to be gross of *capital contributions*, with *capital contributions* separately reported in Table E3.1(F). Forecast *capital expenditure* must exclude escalation.

Mains Replacement Capital Expenditure

- 2.5 Workbook 1 Reset (forecast) data and Workbook 2 Historical data, regulatory template E2. Mains Repex Table E2.1.1 and Table E2.2.1 instructions:
 - (a) List each *proactive mains replacement project* for which *capital expenditure* was incurred during the *previous* or *current access arrangement period* or for which *capital expenditure* is forecast to be incurred over the *next access arrangement period*, and the total cumulative *capital expenditure* over the life of the *project* is greater than or equal to \$500,000 (real \$June 2023), in *regulatory template* E2. Mains Repex.
 - (b) For each *proactive mains replacement project* provided in response to 2.5(a), report the expenditure incurred or forecast to be incurred for each *regulatory year* in table E2.1.1; and the length of pipeline added or forecast to be added in table E2.2.1.
 - (c) For each *proactive mains replacement project* listed in table E2.1.1 and E2.2.1, specify in the materials submitted to the *AER* or *basis of preparation*:
 - (i) an *internal identification code*, in order to report actual *capital expenditure* against forecast *capital expenditure*;
 - (ii) the *asset class* to which the *project* belongs. If the *project* has been allocated to multiple *asset classes*,

AGN has complied with these requirements.

Please note, forecast capital expenditure projects have not yet been assigned an internal identification code.

Requirement Response

provide the percentage allocation of the *project* to the *asset classes*; and

- (iii) the *project* name used internally.
- (d) Provide the total capital expenditure for all proactive mains replacement projects in aggregate, for which capital expenditure was incurred during the previous or current access arrangement period or for which capital expenditure is forecast to be incurred over the next access arrangement period, and the total cumulative capital expenditure over the life of each project is less than \$500,000 (real \$June 2023).
- (e) Provide the length of the pipeline for all *proactive mains* replacement projects in aggregate, for which capital expenditure was incurred during the previous or current access arrangement period or for which capital expenditure is forecast to be incurred over the next access arrangement period, and the total cumulative capital expenditure over the life of each project is less than \$500,000 (real \$June 2023).
- (f) The capital expenditure included in Table E2.1.1(A to E) for proactive mains replacements are to be gross of capital contributions, with capital contributions separately reported in Table E2.1.1(F). Forecast capital expenditure expenditures must exclude escalation.
- 2.6 Workbook 1 Reset (forecast) data and Workbook 2 Historical data, regulatory template E2. Mains Repex Table E2.1.2 instructions:
 - (a) The *capital expenditure* included in Table E2.1.2(A to E) for *reactive mains replacements* are to be gross of *capital contributions*, with *capital contributions* separately reported in Table E2.1.2(F). Forecast *capital expenditure* expenditures must exclude escalation.

AGN has complied with these requirements.

Meter Replacement

Requirement Response AGN has complied with these requirements. Workbook 1 – Reset (forecast) data and Workbook 2 – Historical data, regulatory template E4. Meter replacement - Table E4.1.3 instructions: As noted above under 2.2 Expenditure Requirements, 3. Capital The capital expenditure incurred for new meters acquired in the Expenditure, 3.2, there are two subcategories of capital expenditure that could not be reported because the information is not available. Those were regulatory year is to be reported in table E4.1.1. as follows: The capital expenditure incurred for meter installation for the regulatory year is to be exclusive of the unit cost of the new Table E4.1.3 – Meter Installation meter. The unit cost of the new meter is to be reported in table • Table E4.1.4 – Other Meter Replacement Capex E4.1.1. AGN and APA's business systems record new and refurbished meter The *capital expenditure* incurred for new *meter* installations are replacement capex but does not separately identify activities and costs for inclusive of the expenditures to remove existing *meters*. If the meter installation or other meter replacement capex. All meter replacement existing meters are removed and not replaced, the removal capex has been reported as either new or refurbished meters, which expenditures incurred are to be treated as operating includes an element of installation and any other associated costs, which is expenditure, and not reported in tables E4.1.1 to E4.1.4. the most disaggregated level available for this information. Workbook 1 – Reset (forecast) data and Workbook 2 – Historical data, AGN has complied with these requirements. regulatory template E4. Meter replacement – Table E4.1.1 to E4.1.4 instructions: The capital expenditure included in tables E4.1.1 to E4.1.4(A to E) are to be gross of capital contributions, with capital contributions separately reported in Table E4.1.1 to E4.1.4(F). Forecast capital expenditure must exclude escalation. Non-Network: Telemetry Capital Expenditure Workbook 1 – Reset (forecast) data and Workbook 2 – Historical data, AGN has complied with these requirements. regulatory template E6. Non Network - Table E6.5.1 instructions: List each telemetry capital expenditure project, for which capital Please note, forecast capital expenditure projects have not yet been expenditure was incurred during the previous or current access

arrangement period or for which capital expenditure is forecast to be incurred over the next access arrangement, and the total cumulative capital expenditure over the life of the project is assigned an internal identification code.

Requirement Response greater than or equal to \$500,000 (real \$June 2023), in regulatory template E6. Non Network. For each telemetry capital expenditure project provided in response to 2.9(a), report the expenditure incurred or forecast to be incurred for each regulatory year in table E6.5.1. For each telemetry capital expenditure project listed in table E6.5.1, specify in the materials submitted to the AER or basis of preparation: an internal identification code, in order to report actual capital expenditure against forecast capital expenditure; the asset class to which the project belongs. If the project has been allocated to multiple asset classes, provide the percentage allocation of the *project* to the *asset classes*; and the *project* name used internally. Provide the total *capital expenditure* for all *telemetry projects* in aggregate, for which capital expenditure was incurred during the previous or current access arrangement period or for which capital expenditure is forecast to be incurred over the next access arrangement period, and the total cumulative capital expenditure over the life of each project is less than \$500,000 (real \$ June 2023). The capital expenditure included in Table E6.5.1 (A to E) are to be gross of capital contributions, with capital contributions separately reported in Table E6.5.1(F). Forecast capital expenditure must exclude escalation. 2.10 Workbook 1 – Reset (forecast) data and Workbook 2 – Historical data, AGN has complied with these requirements. regulatory template E12. ICT - Table E12.1 instructions:

List each ICT project for which capital expenditure was incurred during the *previous* or *current access arrangement period* or for

Requirement Response

which *capital expenditure* is forecast to be incurred over the *next access arrangement period*, and the total cumulative *capital expenditure* over the life of the *project* is greater than or equal to \$500,000 (real \$June 2021), in *regulatory template* E12. ICT.

- (b) For each *ICT project* provided in response to 2.10(a), report the expenditure incurred or forecast to be incurred for each *regulatory year* in table E12.1.
- (c) For each *ICT project* listed in table E12.1, specify in the materials submitted to the *AER* or *basis of preparation*:
 - (i) an *internal identification code*, in order to report actual *capital expenditure* against forecast *capital expenditure*;
 - (ii) the asset class to which the project belongs. If the project has been allocated to multiple asset classes, provide the percentage allocation of the project to the asset classes; and
 - (iii) the *project* name used internally.
- (d) Provide the total capital expenditure for all ICT projects in aggregate, for which capital expenditure was incurred during the previous or current access arrangement period or for which capital expenditure is forecast to be incurred over the next access arrangement period, and the total cumulative capital expenditure over the life of each project is less than \$500,000 (real \$June 2023).
- (e) The *capital expenditure* included in Table E12.1 (A to E) are to be gross of *capital contributions*, with *capital contributions* separately reported in Table E12.1(F). Forecast *capital expenditure* must exclude escalation.

Please note, forecast capital expenditure projects have not yet been assigned an internal identification code.

Non-Network: Other Capital Expenditure

Requirement Response 2.11 Workbook 1 – Reset (forecast) data and Workbook 2 – Historical data, AGN has complied with these requirements. regulatory template E13. Other Capex - Table E13.1 instructions: Please note, in Workbook 1 Reset (forecast) data, the projects listed with List each other capital expenditure project, for which capital expenditure >\$500k has not copied down to tables A - F. Please refer to

- expenditure was incurred during the previous or current access arrangement period or for which capital expenditure is forecast to be incurred over the next access arrangement, and the total cumulative capital expenditure over the life of the project is greater than or equal to \$500,000 (real \$June 2023), in regulatory template E13. Other Capex.
- For each *other capital expenditure project* provided in response to 2.11(a), report the expenditure incurred or forecast to be incurred for each regulatory year in table E13.1.
- For each other capital expenditure project listed in table E13.1, specify in the materials submitted to the AER or basis of preparation:
 - an internal identification code, in order to report actual capital expenditure against forecast capital expenditure;
 - the asset class to which the project belongs. If the project has been allocated to multiple asset classes, provide the percentage allocation of the *project* to the *asset classes*; and
 - the *project* name used internally.
- Provide the total capital expenditure for all other capital expenditure projects in aggregate, for which capital expenditure was incurred during the previous or current access arrangement period or for which capital expenditure is forecast to be incurred over the next access arrangement, and the total cumulative capital expenditure over the life of each project is less than \$500,000 (real \$June 2023).

the "Additional disclosures" tab for more information.

Please note, forecast capital expenditure projects have not yet been assigned an internal identification code.

Requirement Response The capital expenditure included in Table E13.1 (A to E) are to be gross of capital contributions, with capital contributions separately reported in Table E13.1(F). Forecast capital expenditure must exclude escalation. Capitalised Overheads Expenditure Capitalised overheads expenditure reported in Workbook 2 – Historical is 2.12 General: consistent with AGN's Cost Allocation Methodology and Capitalisation Policy. Ensure capital expenditure: (a) In the most part, capitalised overheads in Workbook 2 - Historical are is consistent with the pipeline service provider's cost reported under D. Other Direct Expenditure with the exception of E12 ICT allocation method and capitalisation policy, and where table D represents Other (non-labour) internal expenditure. reconciles to the *pipeline service provider* s *audited* Further, the amounts of capitalised overheads reported has been reconciled statutory accounts. to the annual movements in the AGN Victoria and AGN Albury fixed assets Set out any additional working calculations used to derive data register and related movements in Property, Plant & Equipment in AGN that are allocated into particular columns in supporting Limited's statutory accounts. worksheets. Please also refer to Attachment 9.3 of the Final Plan. **Operating Expenditure** AGN has complied with this requirement. 2.13 General: the pipeline service provider must provide reconciliation of the operating expenditure forecasts provided in the regulatory templates to the operating allowances in the PTRM for the next access arrangement period. 2.14 Workbook 1 – Reset (forecast) data, regulatory template E20. Opex -AGN has complied with this requirement. Table E20.1 instructions: Please refer to Chapter 8 and Attachment 8.1 of the Final Plan. specify the forecast of the: efficient operating expenditure at the end of the current

access arrangement period in dollars;

Requirement				Response
		(ii)	effect of real price growth on <i>operating expenditure</i> in dollars;	
		(iii)	effect of output growth on <i>operating expenditure</i> in dollars;	
		(iv)	effect of productivity growth on <i>operating expenditure</i> in dollars;	
		(v)	value of <i>category specific forecasts</i> that year in dollars; and	
		(vi)	value of step changes to occur that year in dollars.	
	(b)	the ta	rence the supporting information for the data input into able. The required supporting information is set out in graphs 4 and 5 of Schedule 2 of this <i>notice</i> .	
2.15	2.15 Workbook 1 – Reset (forecast) data, regulatory template E20. Opex - Table E20.2 instructions:			Not applicable
	(a)		ach <i>regulatory year</i> specify the <i>operating expenditure</i> , sive of <i>related party margins</i> forecast to be incurred;	
	(b)	relate policy	ach <i>regulatory year</i> where the insurance expenditure es to a deductible or an excess on a commercial insurance y, specify the amount, of deductible risk to which the <i>line service provider</i> was or is forecast to be exposed; and	
	(c)	the ta	ence the supporting information for the data input into able. The required supporting information is set out in graph 4 and 5 of Schedule 2 of this <i>notice</i> .	
2.16	6 Workbook 1 – Reset (forecast) data, regulatory template E20. Opex - Tables E20.3 instructions:			Not applicable
	(a)		ach year specify the <i>related party margin</i> expenditure ast to be incurred; and	

Attachment 1 Requirement Response The *pipeline service provider* is to reference the supporting information for the data input into the table. The required supporting information is set out in paragraph 4 and 5 of Schedule 2 of this notice. **Ancillary Reference Services** 2.17 Workbook 1 - Reset (forecast) data, regulatory template E21. ARS Not applicable instructions: if the *pipeline service provider* changes the ancillary *reference* service categories, the pipeline service provider must amend and backcast the data for all categories. 2.18 Workbook 1 - Reset (forecast) data, regulatory template E21. ARS - AGN has complied with this requirement. Table E21.1 instructions: ensure that the data provided reconciles to any applicable internal planning models. 2.19 Workbook 1 - Reset (forecast) data, regulatory template E21. ARS - AGN has complied with this requirement. Table F21.3 instructions: for each year and for each reference service category specify the *operating expenditure* incurred, or expected to be incurred by the *pipeline service provider* for services provided; and ensure that the data provided reconciles to internal planning models used in generating the pipeline service provider's proposed *revenue* requirements. Revenue

- 2.20 *Workbook 1 Reset (forecast) data, regulatory template* F3. Revenue instructions:
 - (a) and (f) Not applicable AGN has complied with this requirement.
 - if the pipeline service provider changes the tariff or customer type, the pipeline service provider must amend and backcast the

Requirement Response

data for all categories, and duplicate the relevant table to provide historical data based on the tariff or *customer* type that applied at that time.

- (b) In table F3.1.1 for each regulatory year, the pipeline service provider must forecast the revenue to be earnt for each haulage reference services tariff during the regulatory year. The tariffs used for each year are to be mutually exclusive and collectively exhaustive.
- (c) In table F3.1.2 for each *regulatory year*, the *pipeline service provider* must forecast the stand alone cost per unit for each *haulage reference services* tariff listed in table F3.1.1.
- (d) In table F3.1.3 for each *regulatory year*, the *pipeline service provider* must forecast the avoidable cost per unit for each haulage reference services tariff listed in table F3.1.1.
- (e) In table F3.2 for each *regulatory year*, the *pipeline service provider* must forecast the revenue to be earnt for each *ancillary reference services* category during the *regulatory year*. The *ancillary reference service* categories are to be mutually exclusive and collectively exhaustive.
- (f) In table F3.3 for each regulatory year, the pipeline service provider must forecast the revenue to be earnt for each rebateable services category during the regulatory year. The rebateable services categories are to be mutually exclusive and collectively exhaustive.
- (g) In table F3.4 for each *regulatory year* the *pipeline service* provider must forecast the revenue to be earnt for each non-reference services category during the *regulatory year*. These non-reference services categories are to be mutually exclusive and collectively exhaustive.

				Attachment
Requ	Requirement			Response
2.21	1 General:			Not applicable
	(a)	type	e pipeline service provider changes the tariff or customer, the pipeline service provider must amend and backcast data for all categories.	
2.22	Workbook 1 – Reset (forecast) data, regulatory template S1. Customer numbers - Table S1.1 instructions:			AGN has complied with this requirement.
	(a)		each regulatory year, the pipeline service provider must rt for each customer category listed in table S1.1:	
		(i)	the total <i>customer connections</i> in the <i>regulatory year</i> , and	
		(ii)	total customer disconnections in the regulatory year.	
	(b)		customer number on the last day of each regulatory year each customer category listed in table S1.1 is the total of:	
		(i)	the <i>customer</i> number on the first day of each <i>regulatory year</i> ,	
		(ii)	plus (+) the total <i>customer connections</i> in the <i>regulatory year</i> , and	
		(iii)	less (-) the total <i>customer disconnections</i> in the <i>regulatory year</i> .	
	(c)	betw categ categ all	pipeline service provider must check that the difference veen the total number of connections across all customer gories and the total number of disconnections across all gories equals the total number of new connections across customer categories (in <i>regulatory template</i> E5 -nections). If it does not, explain the difference.	
2.23	2.23 <i>Workbook 1 – Reset (forecast) data, regulatory template</i> S1.2 AGN has complied with this requirement. Customer numbers - Table S1.2 instructions:			AGN has complied with this requirement.

Requirement Response

- (a) for each *regulatory year*, the *pipeline service provider* must report for each *haulage reference services tariff*.
 - (i) in table S1.2.3 the total number of new and existing customers who have started using the *tariff*; and
 - (ii) in table S1.2.4 the total number of existing customers who are no longer using the *tariff*.
- (b) The *customer* number on the last day of each *regulatory year* for each tariff listed in table \$1.2.2 is the total of:
 - (iv) the *customer* number on the first day of each *regulatory year* reported in table S1.2.1;
 - (v) plus (+) the total number of new and existing customers who have started using the tariff reported in table S1.2.3; and
 - (vi) less (-) the total number of existing customers who are no longer using the tariff reported in table \$1.2.4.
- (c) The pipeline service provider must check that the difference between the total number of connections across all tariffs and the total number of disconnections across all tariffs equals the total number of new connections across all tariffs (in *regulatory template* E5 - Connections). If it does not, explain the difference.

Consumption and Demand

2.24 General: Not applicable

(a) if the *pipeline service provider* changes the tariff or *customer* type for the *next access arrangement period*, the *pipeline service provider* must amend and backcast the data for all categories, and duplicate the relevant table to provide

			Attachment :	
Requ	uirem	ent	Response	
		historical data based on the tariff or <i>customer</i> type that applied at that time.		
2.25	Workbook 1 – Reset (forecast) data, regulatory template N1. Demand instructions:		AGN has complied with this requirement.	
	(a)	for each <i>regulatory year</i> , the <i>pipeline service provider</i> in table N1.1 must provide the volumes of gas metered delivered, or forecast to be delivered by <i>haulage reference services</i> for all customer categories listed.		
	(b)	for each <i>regulatory year</i> , the <i>pipeline service provider</i> must provide in table N1.2 the volumes of gas metered delivered, or forecast to be delivered by <i>haulage reference services</i> tariffs.		
		For each <i>regulatory year</i> the <i>pipeline service provider</i> in table N1.2 is to provide all applicable tariffs. The tariffs used for each year are to be mutually exclusive and collectively exhaustive.		
Relat	ed Pa	rty Margin		
2.26	Gene	eral:	Not applicable	
	(a)	the <i>pipeline service provider</i> must provide in Workbook 1 – Forecast data and Workbook 2 – Historical data regulatory		

- Forecast data and Workbook 2 Historical data, regulatory templates E2 to E6, E12, E13 and E20 the related party margin a related party gains above its total actual costs in a related party transaction with the pipeline service provider.
- The pipeline service provider must provide the related party margin, irrespective of whether the related party margin is reported initially by the related party to the pipeline service provider in its accounting records.

5.3 Part C: Instructions - Workbook 3 and Workbook 4

Requirement	Response
EFFICIENCY CARRYOVER MECHANISM	
1.1 To determine the incentive impact of the <i>pipeline service provider's</i> operating expenditures in the current access arrangement period, the pipeline service provider must provide the required operating expenditure data in Workbook 3 – Efficiency carryover mechanism.	AGN has complied with this requirement.
INDICATIVE IMPACT ON ANNUAL GAS BILLS	
2.1 General: (a) For the purposes of calculating the impact of the <i>pipeline service</i> provider's access arrangement proposal on the annual gas bill of typical residential and business customers in South Australia, provide the data/information required in Workbook 4 – Indicative bill impact, regulatory template Indicative Bill Impact.	AGN has complied with this requirement.
2.2 Workbook 4 – Indicative bill impact, regulatory template Indicative bill impact - instructions:	
(a) complete the yellow cells in Table 1 Typical Gas Bill and Table 2Indicative Annual Average Distribution Price Impact;(b) provide the data source for each input used for the calculation; and(c) outline the assumptions underlying the calculations.	