

Five year plan for our South Australian network

July 2021 - June 2026

**Revised
Final Plan**
January 2021

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Foreword from the CEO

We are pleased to provide this revised Final Plan for Australian Gas Networks' (AGN's) South Australian Access Arrangement for 2021 to 2026. The revised Final Plan reflects the feedback from the AER in its Draft Decision, and also input from the further consultations we have undertaken with customers and stakeholders, and the additional expert advice we have commissioned.

The allowed rate of return for capital invested in the networks and not yet paid for by customers changes constantly as interest rates move around. The AER has also updated its inflation forecasting methodology to reflect persistent low inflation: an important change which we support. These factors impact prices. Before these impacts, and on a like for like basis, the AER's Draft Decision cut \$100 million in revenues from our Final Plan, equivalent to a 15.5% upfront price cut rather than the 6.6% cut we proposed (after inflation).

Our revised Final Plan reflects some of the AER's proposed changes and cuts \$4 million in revenues from our Final Plan, equivalent to a 7.9% upfront price cut. Coming on top of the 21.6% upfront price cut we delivered in 2016, this means prices for customers will still be lower before inflation in 2025/26 than in 2015/16. As well as controlling prices, we are delivering improved customer service, reliability and safety for our growing number of gas customers in South Australia, with a particular focus on vulnerable customers and on the future decarbonisation of our gas networks.

There is strong alignment between our proposal and the AER as to what is required to meet the needs of our customers over the next AA period. We agree with the AER that there are few areas of difference to be reconciled, which we have addressed in this revised Final Plan.

There are several areas of our revised Final Plan which I would like to highlight for the future of gas networks.

Firstly, the clarification from the AER that we can purchase replacement gas from renewable sources is particularly welcome. This is a strong recognition of the preferences of our customers and provides an initial and affordable pathway to reduce our emissions and start the process for the wider decarbonisation of gas networks. Our revised Final Plan provides updated information to enable these costs to be included in our operating expenditure forecast.

Secondly, we welcome the acceptance by the AER of our proposal not to make fundamental changes to depreciation at this stage in response to uncertainty over the future role of gas networks. But as the Draft Decision also makes clear, the future of gas remains a live issue. The elevation of this issue on the AER's list of strategic priorities provides a pathway to develop an appropriate framework to address the issue, which we support.

We are confident gas networks will play a significant role in achieving net zero emissions by delivering hydrogen and other renewable gases. However, addressing uncertainty about this role requires a clear framework to translate information about the future into action today in a manner which is transparent, understood and supported by our customers and stakeholders. Our revised Final Plan presents our early thoughts on how such a framework might be structured.

Our revised Final Plan provides additional information and independent expert advice that supports our proposed mains replacement program in those instances where we have not accepted the AER's Draft Decision. Overall, we are proposing to replace 770km of cast iron, unprotected steel and early generation plastic pipe. This is 163km more than the AER Draft Decision, but is 90km less than our original Final Plan. We have provided the additional information and analysis sought by the AER in its Draft Decision.

While we have accepted some mains replacement deferrals proposed by the AER in the Draft Decision, we believe the full extent of the mains replacement program presented in the revised Final Plan is essential to maintain the safety and integrity of our network. As a result, our revised Final Plan proposes to invest capital expenditure of \$529 million over the next AA period, \$48 million (or 10%) higher than the AER's Draft Decision but \$50 million (or 9%) lower than our Final Plan.

On operating expenditure, we believe additional costs are required for the Vulnerable Customer Assistance Program (VCAP), digital customer experience initiative and insurance costs. In our engagement program, the VCAP and digital customer initiative had strong customer and stakeholder support. Both will deliver improved services for customers in the next AA period by making our services more accessible and transparent to customers, and align them to the expectations of a modern energy service provider.

These and other changes mean our forecast opex for the next AA period is \$351 million, which is \$21 million (or 6%) higher than the AER's Draft Decision but \$7 million (or 2%) lower than our Final Plan.

Our revised Final Plan also further reflects on the economic impacts of COVID-19. South Australia has remained largely unaffected by the virus, however virus containment lockdowns have had some impact on customer consumption, which will not continue into the future. Our forecast of gas demand and connections to our network therefore take account of the temporary nature of the lockdowns.

I also want to note that we have decided not to proceed at this time with the extension of our network to Mount Barker. This decision is unfortunate but unavoidable as the regulatory framework currently does not deliver sufficient returns on new investment to finance such a significant extension of the network. The current environment and regulatory framework guiding returns presents a significant challenge for investors. We acknowledge that this will be disappointing for customers and stakeholders who would have benefited from the extension of the network.

Overall our revised Final Plan reflects the feedback from the AER in its Draft Decision, either by accepting its positions or by providing further evidence to support our positions. The plan delivers continuous improvement for customers on our already high levels of customer safety, reliability and service, whilst controlling prices. Costs are lower than in our Final Plan, and there is a 7.9% upfront price cut for customers, leaving prices at the end of the next period in 2025/26 below where they were in 2015/16, before the impact of inflation. We look forward to further engagement with customers, stakeholders and the AER, in the lead up to the Final Decision.

Ben Wilson

Chief Executive Officer

Australian Gas Infrastructure Group

Revised Final Plan

2021/22 – 2025/26

Customers are at the centre of our planning in South Australia

Our customers and stakeholders value:

- Maintaining a high level of community safety and reliability
- Sustaining our strong track record of customer service
- Keeping costs low, while still investing for the future

Lower prices

8%
↓

**price cut
from 1 July 2021**
(after inflation)

Our plan from July 2021



Delivering for customers

40,000

new connections

>8.2

customer satisfaction

public leak reports within **2 hours**

>95% and 100% compliance with Leak Management Plans



A good employer



Top decile employee engagement

>99%

mandatory training compliance



Target Zero Harm across our operations



Sustainably cost efficient



Lower total expenditure



Initial investments to secure the long-term future of the SA distribution network

770 km
of mains replacement

including the replacement of all cast iron mains

Plan Updates

Background

Australian Gas Networks Limited (AGN) is part of the Australian Gas Infrastructure Group (AGIG), one of the largest gas infrastructure businesses in Australia. We deliver gas safely and reliably to more than 460,000 South Australian homes and businesses every year.

Under the National Gas Law (NGL) and National Gas Rules (NGR), enacted in South Australia in the *National Gas Access (South Australia) Act 2008*, we are required to propose revisions to the AGN SA Access Arrangement every five years. On 1 July 2020, we submitted our Final Plan to the Australian Energy Regulator (AER).

The Final Plan outlined the key activities and expenditure that we intend to undertake and the prices that we propose to charge over the next (2021-22 to 2025-26) AA period. It also highlighted feedback that we received from our customers and stakeholders, including on our Draft Plan.¹

On 27 November 2020, the AER released its Draft Decision on our Final Plan. This revised Final Plan is our response to the Draft Decision.

Our Response to the Draft Decision

Table 1 provides a summary of the AER's Draft Decision and our response. The table notes whether we accept, modify or reject the Draft Decision in the revised Final Plan. The table also provides a reference to the relevant attachment explaining the reasons behind our approach.

As the table shows, we have either accepted or modified the majority of the Draft Decision. The key areas that we have modified relate to the AER's proposed treatment of mains replacement in our capital expenditure (capex) proposal and proposed step changes.

A document map is available in Attachment 1.8A. The Document Map outlines the structure of the original Final Plan, and highlights in blue new attachments included in this revised Final Plan.

Table 1: Summary of our response to the AER's Draft Decision

Topic	AER Draft Decision	AGN Response	AGN Comment
Services	Accept	Accept	We have not made any changes to the services accepted by the AER.

¹ We released our Draft Plan for public consultation in February 2020

Topic	AER Draft Decision	AGN Response	AGN Comment
Operating expenditure	Modify	Modify	<p>We maintain our Final Plan position on step changes and have accounted for the forecast cost of purchasing renewable gas as part of meeting our UAAG requirements.</p> <p>We have updated the base year opex for 2019/20 actuals and the trend applied to our base year costs to reflect updated advice on forecast labour costs from BIS Oxford Economics and changes in output growth associated with updated new connection numbers.</p> <p>Further information is detailed in Attachment 7.10.</p>
Capital expenditure	Modify	Modify	<p>We have updated current AA capex for more recent information and modified our mains replacement program and other distribution system capex in the next AA period.</p> <p>Further information is detailed in Attachment 8.11.</p>
Capital base	Modify	Modify	<p>We have sought independent technical and accounting advice on the ongoing role of replaced HDPE mains and incorporated this advice into our revised Final Plan.</p> <p>We have not adjusted our approach to economic lives in the revised Final Plan.</p> <p>We have adopted the AER's recent final position on the treatment of inflation.</p> <p>Further information is detailed in Attachment 9.3.</p>
Financing costs	Accept	Accept	<p>We have continued to adopt the AER's Rate of Return Instrument and the outcomes of the recent Tax Review and have updated calculations to reflect more recent data.</p> <p>Further information is detailed in Attachment 10.2.</p>
Incentives	Modify	Accept	<p>We have accepted the AER's minor modifications to the opex EBSS and the introduction of the capex CESS, consistent with the AER's Draft Decision.</p> <p>Further information is detailed in Attachment 11.2.</p>
Demand	Accept	Accept	<p>We have updated a number of inputs to the demand forecast with latest information.</p> <p>Further information is detailed in Attachment 12.4.</p>
Revenue and pricing	Modify	Modify	<p>Further information is detailed in Attachment 13.4.</p>
Network access	Accept	Accept	<p>We have accepted minor modifications made by the AER.</p> <p>Further information is detailed in Attachment 14.4.</p>

Note: In this 'traffic light' table, green shading represents the acceptance, orange represents a modification/modifications and red shading represents a rejection.

Our revised Final Plan

Our revised Final Plan accepts the majority of the AER's Draft Decision. Any changes reflect consideration of additional information sought by the AER in its Draft Decision. A brief summary of key areas is outlined below. The Attachments listed here and in the Document Map (Attachment 1.8A) provide our detailed reasoning. All modifications have been included in the proposed revisions to the Access Arrangement.

- **Services:** The AER's Draft Decision approves the proposed haulage and ancillary reference services outlined in our Final Plan. The services approved, which we accept, remain unchanged from the Reference Service Proposal we submitted in June 2019 and which was approved by the AER in November 2019.
- **Operating expenditure:** Forecast opex for the next AA period is \$351 million, which is \$21 million (or 6%) higher than the AER's Draft Decision but \$7 million (or 2%) lower than our Final Plan. The AER accepted the majority of our proposed opex however requested further information in support of some of our proposed step changes as well as updates for the most recently available actual data. The revised Final Plan addresses these matters raised by the AER its Draft Decision, and we have therefore:
 - updated our base year for actual 2019/20 opex costs;
 - reinstated the step changes relating to the digital customer initiative and insurance costs and the Vulnerable Customer Assistance Program (VCAP) treated as a category specific forecast as recommended by the AER;
 - applied an updated real labour escalation forecast derived from an average of the most recent forecast from BIS Oxford Economics and the Deloitte Access Economics forecast used by the AER in its Draft Decision.

We have also accounted for the cost of purchasing renewable gas as part of meeting our Unaccounted for Gas (UAFG) requirements, the costs of which are known now, instead of incorporating these costs in the annual tariff variation mechanism.

- **Capital expenditure:** Our revised Final Plan modifies the AER's Draft Decision, proposing \$529 million in capex over the next AA period, \$48 million (or 10%) higher than the AER's Draft Decision but \$50 million (or 9%) lower than our Final Plan (Attachment 8.11).
 - **Mains replacement:** A key element of our capex forecast, our response provides an update to our work program for the next AA period. We propose to invest \$259 million in mains replacement over the next AA period which is an increase of \$50 million (or 20%) from the Draft Decision but a reduction of \$35 million (or 13%) from the \$294 million proposed in our Final Plan. This will provide for the proactive replacement of 770km of cast iron/unprotected steel and early generation plastic pipes. This is an increase of 163km on the Draft Decision but a reduction of 90 km from our Final Plan. Attachments 8.3A and 8.12 provide further information, including independent expert advice that supports various elements of our mains replacement program (Cast iron/unprotected steel block replacement and HDPE 575 DN40 High Pressure replacement), including why this replacement cannot be deferred as per the Draft Decision.

Based on a review of these two elements of our mains replacement program, GHD concluded the:

capital expenditure [is] justified as it is necessary to maintain and improve the safety of services (NGR 79(2)(c)(i)) and to maintain the integrity of services (79(2)(c)(ii)). Further, we find the expenditure is conforming as it is capital expenditure that would be incurred by a prudent service provider acting efficiently, in accordance with good industry practice (NGR 79(1)(b)).²

We have however accepted the deferral of some elements of our mains replacement program (specifically the deferral of 90km of HDPE 575 DN40 Medium Pressure mains) while continuing to monitor the condition and performance of these and other at-risk mains. During this process, some of these mains may be reprioritised for replacement during the next AA period in accordance with our mains risk reduction prioritisation approach.

- Other distribution system capex: We have accepted some elements of the AER's Draft Decision, including reducing the scope of the proposed valve replacement and pipeline modification programs.
- Growth capex: we are proposing a reduction to our growth capex, largely driven by our decision not to proceed at this time with the extension of our network to Mt Barker. As it stands the regulatory framework currently does not deliver sufficient returns on new investment to finance such a significant extension of the network. We are communicating this decision with relevant stakeholders and we acknowledge the key role our stakeholders have played throughout the development of this important project.
- **Capital Base:** Our revised Final Plan closing capital base is \$138.8 million (6.7%) in nominal terms lower than in the Final Plan due to some updates to actual and forecast capex, change in regulatory depreciation and the change in the estimate of inflation.
 - Our revised Final Plan includes depreciation with respect to HDPE pipelines and inlets which have been replaced or forecast to be replaced over the next AA period. These assets will not be providing any ongoing services to consumers post insertion for the purpose of ongoing gas transportation services and therefore have no residual value. This is supported by independent expert advice (Attachment 9.4).
 - The estimate of inflation throughout the period has changed from 2.37% in the Final Plan to 1.95% in the revised Final Plan which reduces the growth in our RAB throughout the regulatory period. If 1.95% was used in the Final Plan, the closing RAB would have been \$41.4m lower, all other inputs being equal.
 - On the **future of gas** and its implications for depreciation, we agree with the view presented in the Draft Decision that we have taken a sound approach to the uncertainties faced by the South Australian gas distribution network. In particular, the Draft Decision accepts our proposal not to make fundamental changes in the next AA period. Nonetheless, we agree that this issue requires urgent consideration by the AER, consumers, industry and government.

Network assets are long-lived and investments made today will shape the future evolution of the energy sector for decades. We believe our assets, carrying hydrogen

² AGN SA, revised Final Plan, Attachment 8.12, GHD Advisory, Review of selected distributions capex programs, January 2021, section 3.2.

and other renewable gases, will continue to play a role in a low carbon energy system. However, their value may not be tied to their efficient investment cost as under current regulatory models. To ensure efficient investment continues to provide the lowest cost energy to consumers into the future, regulators will need to think about the competitive position of different energy options in the future.

This requires a framework to translate information about the future into action today in a manner which is transparent and provides confidence to our customers and stakeholders. Our revised Final Plan presents our early thoughts on how such a framework might be structured, along with an expansion of some of our views about future competition and the role of regulatory stewardship (Attachment 9.6).

- **Financing costs:** Our revised Final Plan accepts the AER's Draft Decision on financing costs and has been updated to reflect more recent market data. This results in an average rate of return of 4.16%. We note that the AER will determine our final allowed rate of return using our nominated averaging period prior to its Final Decision.
- **Incentives:** We have accepted all the AER's Draft Decision on incentives. The Draft Decision allowed for the continuation of the EBSS and approved the introduction of a CESS in the next AA period. Our revised Final Plan also outlines progress we have made in considering a Network Innovation Scheme. In our Final Plan, we outlined the support received during our customer and stakeholder engagement program for a network innovation scheme and committed to consult on the scope and form of the scheme with our customers and stakeholders, the AER and the wider industry. Since the release of our Final Plan, we have commenced a sector-wide engagement program on a gas network innovation scheme (GNIS) in partnership with Jemena Gas Networks and AusNet Services. This engagement is continuing, and if timing permits, we may present an updated proposal prior to the AER's Final Decision.
- **Demand:** In the Draft Decision, the AER accepted our approach to forecasting demand over the next AA period, noting that we would update inputs in our revised Final Plan. Core Energy & Resources (Core) have updated inputs to the forecast including: 2019/20 actual data on consumption and connections, 2019/20 Bureau of Meteorology Weather data, Housing Industry Association (HIA) data with the latest available report to forecast future dwelling commencements, Gross State Product (GSP) forecasts and the outlook for electricity and gas prices. Core have also taken account of the impact of COVID on consumption and the temporary nature of containment lockdowns.
- **Network access:** On network access, the AER accepted our proposed changes to the terms and conditions and our proposed changes to the Access Arrangement Document. We have incorporated these changes into the revised Final Plan without change.

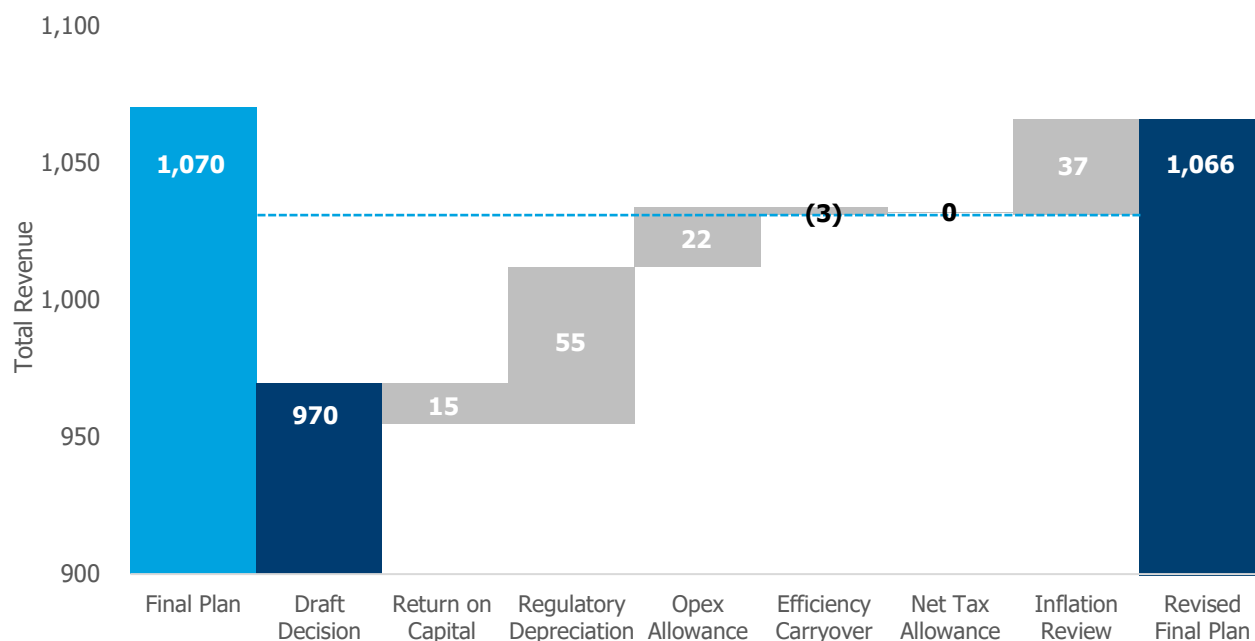
What we will deliver

In line with our Vision, our revised Final Plan will enable the SA gas distribution network to deliver for customers, be a good employer and be sustainably cost-efficient.

Table 2 and Figure 1 below summarise the regulatory building blocks, demand and price in our revised Final Plan relative to our Final Plan and the Draft Decision.

Our revised Final Plan delivers allowed revenue of \$1,066 million in \$2020/21, which is around \$96 million (or 10%) above the AER's Draft Decision but \$4 million (or 0.4%) below our original Final Plan submitted in July 2020. Adjusting for the new estimate of inflation, our revised Final Plan would be \$41 million (3.8%) lower than the Final Plan as shown by the blue dotted line in Figure 1 below.

Figure 1: Comparison of the Final Plan and the revised Final Plan (\$million, 2020/21)



In 2020/21:

- The average residential customer's annual distribution charge is \$520;
- The average commercial customer's distribution charge is \$4,908; and
- The average industrial customer's distribution charge is \$272,237.

Table 2: Forecast changes in average distribution charge over the next AA period relative to 2020/21:

	Residential	Commercial	Industrial
From 1 July 2021 (7.9% price cut)	-\$41	-\$251	-\$21,507
From 1 July 2022 (3.2% price increase)	-\$26	-\$101	-\$13,427
From 1 July 2023 (3.2% price increase)	-\$10	\$54	-\$5,088
From 1 July 2024 (3.2% price increase)	\$7	\$214	\$3,521
From 1 July 2025 (3.2% price increase)	\$24	\$379	\$12,407
Total change over the five-year period July 2021 – June 2026	-\$46	\$295	\$24,094

Note: Table may not add due to rounding. The annual price changes are inclusive of forecast inflation of 1.95% pa.

Stakeholder Engagement

We are committed to genuine and sustained best practice stakeholder engagement in the development, refinement and implementation of our plans to ensure we deliver value for our customers now and into the future.

Our objective was to embed a genuine customer focus into all aspects of our future planning for our SA gas distribution network. We also set a clear objective of developing a Final Plan which delivers for current and future customers, is underpinned by effective stakeholder engagement and is capable of being accepted by its customers and stakeholders.

Our efforts have been recognised by the wider industry through winning the Energy Network Consumer Engagement Award for 2020, which was organised by Energy Networks Australia in partnership with Energy Consumers Australia.

We have continued to engage with stakeholders in the development of this revised Final Plan, and their feedback has shaped our response. We responded to feedback received from a number of sources, including:

- **Written submissions/advice to or from the AER** - This includes submissions to the AER on our Final Plan, CCP24 advice to the AER on our Final Plan, and feedback provided at the AER AGN Stakeholder Public Forum.
- **AGN led stakeholder engagement activities** - This includes regular South Australian Reference Group (SARG) meetings and Retailer Reference Group Meetings (RRG), ongoing meetings/briefings with CCP24 and Energy Consumers Australia, a Vulnerable Customer Assistance Program Stakeholder Workshop (December 2020) and the Gas Network Innovation Scheme Project, Phase 1 Stakeholder Interviews and Workshop (October/December 2020).

We consulted with SARG and RRG on 9 December 2020 on our proposed approach in this Revised Final Plan (as summarised in Table 1) and received their support.

Next Steps

We will continue to engage with our customers and stakeholders on an ongoing basis, including during the remaining review process leading into the AER's Final Decision, expected by around 30 April 2021. The AER has requested stakeholder feedback on its Draft Decision, following submission of our revised Final Plan, by 17 February 2021. The key dates for the review of our Revised Final Plan are below:

- 17 February 2021 – the AER seeks customer and stakeholder feedback on the AER Draft Decision and our revised Final Plan; and
- ~30 April 2021 – the AER is expected to release its Final Decision.

We would also welcome any additional feedback on our revised Final Plan from our customers and stakeholders at any point in the future. You can provide your feedback online at gasmatters.agig.com.au or by contacting our stakeholder engagement team at kristen.pellew@agig.com.au.

Structure of this revised Final Plan

The structure of our revised Final Plan is outlined in Attachment 1.8A. It has been structured to include the following:

- all of the documents provided to the AER in the July 2020 Final Plan, which is referred to as our Final Plan (for the purposes of brevity and clarity, these documents are not attached to this revised Final Plan as they have already been provided to the AER); and
- further documents which provide additional information, or modify the Final Plan, all of which are attachments to our Final Plan.

More specifically, the structure of this revised Final Plan consists of:

- this Overview, which includes a revised Foreword from our CEO, an overview of key areas, and a list of new attachments;
 - the Document Map (Attachment 1.8A) reflects our Final Plan with the addition of new attachments developed as part of this revised Final Plan (these new documents are highlighted in green);
- attachments to our revised Final Plan:
 - responses to the AER Draft Decision are set out in attachments to the revised Final Plan and prefaced with the words 'Response to Draft Decision' in the title;
 - all information contained in these attachments supersedes information previously provided in our Final Plan to the extent that there is any conflict; and
- a Revised AA Document (including the Terms and Conditions) dated January 2021.

Unless otherwise stated, information presented in our revised Final Plan is in dollars of December 2020.

Glossary

AA	Access Arrangement	HIA	Housing Industry Association
AER	Australian Energy Regulator	HSE	Health Safety Environment
AGIG	Australian Gas Infrastructure Group	I&C	Industrial and Commercial (customers)
AGN	Australian Gas Networks	ILI	In Line Inspection
Capex	Capital Expenditure	MGN	Multinet Gas Networks
CCP, CCP24	Consumer Challenge Panel, Consumer Challenge Panel 24	next AA period	2021/22 to 2025/26
CESS	Capital Expenditure Sharing Scheme	NGL	National Gas Law
CI/UPS	Cast Iron/Unprotected Steel	NGR	National Gas Rules
current AA period	2016/17 to 2020/21	opex	Operating Expenditure
DBP	Dampier Bunbury Pipeline	OTR	Office of the Technical Regulator
DMSIP	Distribution Mains and Service Integrity Plan	RRG	Retailer Reference Group
DRP	Debt Risk Premium	SAMP	Strategic Asset Management Plan
EBSS	Efficiency Benefit Sharing Scheme	SARG	South Australian Reference Group
ESCOSA	Essential Services Commission of South Australia	SCADA	Supervisory Control and Data Acquisition
EWOSA	Energy and Water Ombudsman of South Australia	subsequent AA period	2026/27 – 2030/31
GJ	Gigajoule/s	TJ	Terajoule/s
GSP	Gross State Product	UAFG	UAFG Unaccounted for Gas
HDPE	High density polyethylene	VCAP	Vulnerable Customer Assistance Program

List of Attachments

1.2A Roll Forward Model
1.3A Depreciation Model
1.4 PTRM (CI)
1.5A Rate of Return Model
1.8A Revised Final Plan Document Map
1.9A Revised Final Plan Confidentiality Claims
7.1A Revised Opex Forecast Model (CI)
7.2A Addendum to Opex Business Cases
7.8A BIS Oxford Economics Input Cost Escalation Forecasts to 2025/26
7.8.1A BIS Oxford Economics Input Cost Escalation Updated Forecasts – data
7.10 Response to Draft Decision on Operating Expenditure
8.3A Response on Mains Replacement (CI)
8.6A Addendum to IT Investment Plan
8.7A Revised Capex Forecast Model (CI)
8.8A Addendum to Capex Business Cases (CI)
8.11 Response to Draft Decision on Capital Expenditure
8.12 GHD Review of selected distribution capex programs (CI)
9.3 Response to Draft Decision on Capital Base
9.4 GHD Report on ongoing role of replaced HDPE pipelines (CI)
9.5 BDO Review of proposed treatment for replaced HDPE pipelines
9.6 Future of Gas
10.2 Response to Draft Decision on Financing Costs
11.2 Response to Draft Decision on Incentives
11.3 ECM Model
12.1A Core Energy Gas Demand and Customer Forecast Update
12.2A Updated Demand Forecast Model (DC)
12.4 Response to Draft Decision on Demand
12.5 ACIL Allen Review of COVID-19 related adjustments
13.4 Response to Draft Decision on Revenue and Prices
14.2A Response to Draft Decision: Summary of Changes to AA Document and Terms and Conditions
14.3A Access Arrangement Annexure G Terms and Conditions Marked Version (updated)
14.3 Response to Draft Decision on Network Access
Access Arrangement Document (Marked version and Clean version)
Access Arrangement Annexure G General Terms and Conditions

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