

## Revised Revenue Proposal Submission Guidelines Compliance Checklist

Guideline section	Submission Guideline's Clauses	Addressed in Revised Revenue Proposal
2.1	Compliance	Refer to Revenue Proposal.
2.2	Accounting principles and policies	Refer to Revenue Proposal.
2.3	Cost Allocation	Refer to Revenue Proposal.
2.4	Substance over form	Refer to Revenue Proposal.
2.5	Materiality	Refer to Revenue Proposal.
2.6	Ad Hoc Information Requirements	Refer to Revenue Proposal.
2.7	Information Provided shall be verifiable	Refer to Revenue Proposal.
2.8	Audit Assurance	Audit Assurance is included in Attachment B, this includes audit of 2007/08.
2.9	Tripartite Meeting	Arrangement will be made if AER requires.
2.10	Directors Responsibility Statement	Directors Responsibility Statement is included in Attachment A.
2.11	Format of Information	Electronic and printed copies provided to the AER.
3.1	Underlying Assumptions	Refer to Revenue Proposal.
3.2	Account Headings	Account headings are included in the AER Submission Guidelines Templates, Attachment T.
3.3	Discretionary Headings	Regulatory Account discretionary Headings are consistent. The AER Submission Guidelines discretionary headings were agreed with AER staff prior to lodgement of proposal. Headings are consistent in the revised proposal.
4.1	Introduction	Refer to Revenue Proposal.
4.2	Timing of submission	Revised proposal submitted 14th January 2009.
4.3.1	revenue proposal must be accompanied by all audit assurances that the AER requires under s. 2.8	Audit assurance is included in Attachment B.
4.3.2	revenue proposal must be accompanied by a directors' responsibility statement as required under s. 2.10	Director's responsibility statement is included in Attachment A.

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4.3.3(a)(1), (NER 6A.6.7(a))	Forecasts of the capital expenditure for each year of the relevant regulatory control period by reference to well accepted categories such as: A. asset class (e.g. transmission lines, substations etc), or B. category driver (e.g. regulatory obligation, replacement, reliability, net market benefit, business support etc.) and which identify, in respect of proposed material assets: C. the location of the proposed asset D. the anticipated or known cost of the proposed asset E. the categories of transmission services which are to be provided by the proposed asset.	Refer to Revenue Proposal and adjustments in section 3 of revised revenue proposal.
4.3.3(a)(2), (NER:S6A.1.1)	The methodology used for developing the capital expenditure forecasts.	Refer to Revenue Proposal.
4.3.3 (a)(3)	The forecasts of load growth relied upon to derive the capital expenditure forecasts and the methodology used for developing those forecasts of load growth.	Refer to Revenue Proposal.
4.3.3(a)(4)	The key assumptions that underlie the capital expenditure forecasts.	Refer to Revenue Proposal.
4.3.3(a)(5)	A certification of the reasonableness of the key assumptions by the directors of the TNSP as part of the directors' responsibility statement.	The Directors Responsibility Statement is included in Attachment A.
4.3.3(a)(6)	Capital expenditure for each of the first three years of the current regulatory control period and the expected capital expenditure for each of the last two years of that regulatory control period, categorised in the same way as for the capital expenditure forecasts.	Refer to Revenue Proposal.
4.3.3(a)(7)	An explanation of any significant variations in the forecast capital expenditure from historical capital expenditure.	Refer to Revenue Proposal.
4.3.3(b)	revenue proposal must: 1) include in the forecast of capital expenditure referred to in subsection an amount of any unspent capital expenditure for a contingent project the kind described in clause 6A.6.7(e) of the NER 2) not include in the forecast of capital expenditure referred to in subsection (a) an amount of any capital expenditure for a contingent project of the kind described in clause 6A.6.7(h) of the NER.	Refer to Revenue Proposal.

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4.3.3(c)	revenue proposal must contain an explanation of why it considers that its forecast of capital expenditure is required to: (1) efficiently meet the expected demand for prescribed transmission services over the regulatory control period; (2) comply with all applicable regulatory obligations associated with the provision of prescribed transmission services; (3) maintain the quality, reliability and security of supply of prescribed transmission services; or (4) maintain the reliability, safety and security of the transmission system through the supply of prescribed transmission services.	Refer to Revenue Proposal.
4.3.3(d)	Revenue proposal must contain filled out capital expenditure pro forma statements developed by the AER.	AER Submission Guideline Templates submitted with revised proposal, Attachment T.
4.3.4(a)(1)	Forecasts of the operating expenditure for each year of the relevant regulatory control period which comply with clause 6A.6.6(a) of the NER and which identify the forecast operating expenditure by reference to well accepted categories such as: A. particular programs, or B. types of operating expenditure (e.g. maintenance, payroll, materials etc.) and which identify in respect of each such category: C. to what extent that forecast expenditure is on costs that are fixed and to what extent it is on costs that are variable, and D. the categories of transmission services to which that forecast expenditure relates.	Refer to Revenue Proposal.
4.3.4(a)(2)	The methodology used for developing the operating expenditure forecasts.	Refer to Revenue Proposal.
4.3.4(a)(3)	The forecasts of key variables relied upon to derive the operating expenditure forecasts and the methodology used for developing those forecasts of key variables.	Refer to Revenue Proposal.
4.3.4(a)(4)	The methodology used for determining the cost associated with planned maintenance programs designed to improve the performance of the relevant transmission system for the purposes of any service target performance incentive scheme that is to apply to the TNSP in respect of the relevant regulatory control period.	Refer to Revenue Proposal.

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4.3.4(a)(5)	The key assumptions that underlie the operating expenditure forecasts.	Refer to Revenue Proposal.
4.3.4(a)(6)	A certification of the reasonableness of the key assumptions by the directors of the TNSP as part of the directors' responsibility statement required under s. 4.3.2 of these guidelines.	The Directors Responsibility Statement are included in Attachment A.
4.3.4(a)(7)	Operating expenditure for each of the first three years of the current regulatory control period, and the expected operating expenditure for each of the last two years of that regulatory control period, categorised in the same way as for the operating expenditure forecasts.	Refer to Revenue Proposal.
4.3.4(a)(8)	An explanation of any significant variations in the forecast operating expenditure from historical operating expenditure.	Refer to Revenue Proposal.
4.3.4(b)	<p>A TNSP's revenue proposal must contain a justification for its forecast of operating expenditure on the basis that it is required to:</p> <ul style="list-style-type: none"> <li>(1) efficiently meet the expected demand for prescribed transmission services over the regulatory control period</li> <li>(2) comply with all applicable regulatory obligations associated with the provision of prescribed transmission services</li> <li>(3) maintain the quality, reliability and security of supply of prescribed transmission services, or</li> <li>(4) maintain the reliability, safety and security of the transmission system through the supply of prescribed transmission services.</li> </ul>	Refer to Revenue Proposal.

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4.3.4(c)	<p>In determining whether the AER is satisfied with the forecast operating expenditure proposed by a TNSP, clause 6A.6.6(e) of the NER requires the AER to have regard to ten operating expenditure factors. The following requirements of the operating expenditure forecasting process are relevant to the efficiency benefit sharing scheme:</p> <p>(1) The past expenditure profile of a TNSP may vary and it may be uneven. An uneven expenditure profile may arise for legitimate operational reasons or, in some circumstances, may indicate cost-shifting. The AER will require that a business provide an explanation for the profile of expenditure sufficient to demonstrate that the operating expenditure incurred in the regulatory period is related to operational needs as they arose and does not entail instances of cost-shifting.</p> <p>(2) A TNSP must provide a detailed description of any changes in capitalisation policies that have arisen in the current regulatory control period, or that are proposed to apply in the next regulatory control period. This description must be accompanied by a calculation of the impact of those changes in capitalisation policy. If the AER is not satisfied that a change in capitalisation policy is appropriate, it may adjust the forecast operating expenditure allowance of the TNSP as allowed by clause 6A.6.6(f) of the NER.</p> <p>(3) The operating expenditure forecast must include any necessary adjustments for changes in responsibilities that result from compliance with a new or amended law or licence, or other statutory or regulatory requirement, including a requirement that can be demonstrated to arise directly from a recognised policy, practice or policy generally applicable to similar firms participating in the National Electricity Market.</p> <p>(4) A TNSP must include in its revenue proposal its proposed basis for accounting for growth in demand in the next regulatory control period. This must be accompanied by evidence that the proposed adjustment mechanism accurately reflects the impact of changes in expected growth in demand from a baseline forecast (positive and negative) on operating expenditure.</p>	Refer to Revenue Proposal & section 5 of revised proposal.
4.3.4(d)	Revenue Proposal must contained filled out operating expenditure pro forma statements developed by the AER	AER Submission Guideline Templates submitted with proposal.
4.3.5	Revenue proposal must contain an identification and explanation of any significant interactions between the TNSP's forecast capital expenditure and forecast operating expenditure programs.	Refer to Revenue Proposal.

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4.3.6(a)(1)	Revenue proposal must contain the values, weightings and other elements that the TNSP proposes are to be attributed to the performance incentive scheme parameters for the purposes of the application to the TNSP of the service target performance incentive scheme that applies during the relevant regulatory control period.	Refer to Revenue Proposal and adjustments in section 8 of revised revenue proposal.
4.3.6(a)(2)	Revenue proposal must contain an explanation of how the proposed values, weightings and other elements to be attributed to those performance incentive scheme parameters comply with any requirements relating to them set out in that scheme.	Refer to Revenue Proposal.
4.3.6(b)	The AER has developed the pro forma statement 7.3 at appendix A to assist TNSPs to provide the required information to the AER relating to performance incentive scheme parameters. A TNSP must prepare and submit this pro-forma statement to the AER as part of its revenue proposal.	The pro forma statement has been submitted as part of the revised revenue proposal in Attachment T.
4.3.7(a)	revenue proposal must contain: (1) the values that the TNSP proposes are to be attributed to the efficiency benefit sharing scheme parameters for the purposes of the application to the TNSP of the efficiency benefit sharing scheme that applies in respect of the relevant regulatory control period (2) an explanation of how the values proposed to be attributed to the efficiency benefit sharing scheme parameters comply with any relevant requirements set out in that scheme.	TransGrid proposed efficiency benefit sharing scheme parameters are set out in section 6 in the revised proposal.
4.3.7(b)	The AER has developed the pro forma statement 7.4 at appendix A to assist TNSPs to provide the required information to the AER relating to efficiency benefit sharing scheme parameters. A TNSP must prepare and submit this pro forma statement to the AER as part of its revenue proposal.	TransGrid is under the rules contained in the Statement of Regulatory Principles for current regulatory period and has submitted a template consistent with these requirements in the revised proposal.

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4.3.8(a)-(e)	<p>revenue proposal must contain:</p> <p>(a) the TNSP's calculation of the estimated total revenue cap for the relevant regulatory control period</p> <p>(b) the TNSP's calculation of the maximum allowed revenue for each year of the relevant regulatory control period. using the post-tax revenue model referred to in rule 6A.5 of the NER, together with:</p> <p>(c) details of all amounts, values and other inputs used to generate the calculations</p> <p>(d) a demonstration that any such amounts, values and other inputs comply with the relevant requirements of part C of chapter 6A of the NER</p> <p>(e) an explanation of the calculation of the amounts referred to in subsections (a) and (b), together with an explanation of the amounts, values and inputs referred to in subsection (c).</p>	<p>TransGrid's calculation of the estimated total revenue cap for regulatory control period 2009/10-2013/14 are in section 9. The proposed unsmoothed/smoothed revenue is set out in Figure 9.6. Refer to Post Tax Revenue model for further details.</p>
4.3.9(a)-(c)	<p>revenue proposal must contain the TNSP's calculation of the regulatory asset base for the relevant transmission system for each year of the regulatory control period using the roll forward model referred to in clause 6A.6.1 of the NER, together with:</p> <p>(a) details of all amounts, values and other inputs used by the TNSP for that purpose</p> <p>(b) a demonstration that any such amounts, values and other inputs comply with the relevant requirements of part C of chapter 6A of the NER</p> <p>(c) an explanation of the calculation of the regulatory asset base for each regulatory year of the relevant regulatory control period and of the amounts, values and inputs referred to in subsection (a).</p>	<p>Based on AER roll forward model, TransGrid's revised calculation of the regulatory asset base is set out in section 9. Refer to Revenue Proposal and Roll-forward model for more details.</p>
4.3.10	<p>Under clause S6A.1.3(6) of schedule 6A.1 of the NER, the TNSP's revenue proposal must nominate a commencement and length of the period to be used by the AER to calculate the nominal risk free rate for the regulatory control period according to clause 6A.6.2(c)(2) of the NER.</p>	<p>Section 4 of the revised revenue proposal refers to the Nominal risk free &amp; Debt risk premium. TransGrid has nominated the commencement and length of the period by separate letter in confidence to the AER.</p>

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4.3.11(a)	<p>Under clause S6A.1.3(7) of schedule 6A.1 of the NER, a revenue proposal must contain:</p> <p>(1) the depreciation schedules nominated by the TNSP for the purposes of clause 6A.6.3 of the NER. The depreciation schedules must categorise the relevant assets by reference to well accepted categories such as:</p> <p>A. asset class (e.g. transmission lines and substations), or</p> <p>B. category driver (e.g. regulatory obligation, replacement, reliability, net market benefit and business support), and also by location</p> <p>(2) details of all amounts, values and other inputs used by the TNSP to compile those depreciation schedules and an explanation of the calculation of those amounts, values and inputs</p> <p>(3) a demonstration that the depreciation schedules conform with the requirements set out in clause 6A.6.3(b) of the NER.</p>	<p>TransGrid has provided the Depreciation schedules as part of the AER submission guidelines template submitted with the revised revenue proposal, Attachment T. Depreciation is addressed in section 7 in the revised proposal . Refer to the revised Post Tax Revenue Model for further details.</p>
4.3.11(b)	<p>The AER has developed the pro forma statement 7.2 at appendix A to assist TNSPs to provide to the AER the required information relating to its depreciation schedules. A TNSP may prepare and submit this pro forma statement to the AER as part of its revenue proposal.</p>	<p>Depreciation pro-forma has been submitted with revised proposal, Attachment T.</p>
4.3.12	<p>Revenue proposal must contain the X factors nominated by the TNSP for each year of the relevant regulatory control period for the purposes of clause 6A.6.8(a) of the NER, together with a demonstration that those X factors comply with the requirements set out in clause 6A.6.8(b) of the NER.</p>	<p>TransGrid's proposed X factor is set out in section 9 of the revised proposal.</p>
4.3.13	<p>Revenue proposal must contain the commencement and length of the regulatory control period proposed by the TNSP.</p>	<p>Refer to Revenue Proposal. The proposed period is 1 July 2009 to 30 June 2014.</p>



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4.3.14	<p>Under clause S6A.1.3(10) of schedule 6A.1 of the NER, if the TNSP is seeking a determination by the AER that a proposed contingent project is a contingent project for the purposes of the relevant revenue determination, the TNSP's revenue proposal must contain:</p> <p>(a) a description of the proposed contingent project, including reasons why the TNSP considers the project should be accepted as a contingent project for the regulatory control period</p> <p>(b) a forecast of the capital expenditure which the TNSP considers is reasonably required for the purpose of undertaking the proposed contingent project</p> <p>(c) the methodology used for developing that forecast and the key assumptions that underlie it</p> <p>(d) information that demonstrates that the undertaking of the proposed contingent project is reasonably required to meet one or more of the objectives referred to in clause 6A.8.1(b)(1) of the NER</p> <p>(e) information that demonstrates that the proposed contingent capital expenditure for the proposed contingent project complies with requirements set out in clause 6A.8.1(b)(2) of the NER</p> <p>(f) the proposed trigger events relating to the proposed contingent project and an explanation of how each of those conditions or events addresses the matters referred to in clause 6A.8.1(c) of the NER.</p>	<p>Discussion on contingent projects and events which triggers such projects are set out in Section 3 of the revised proposal. The contingent projects are listed in Appendix J.</p>
4.3.15(a)	<p>revenue proposal must contain a breakdown of the weighted average cost of capital calculation nominated by the TNSP for the purposes of clause 6A.6.2 of the NER, together with a demonstration that this calculation complies with the requirements set out in clause 6A.6.2(b) of the NER.</p>	<p>Refer to Revenue Proposal and revised revenue proposal section 4.</p>
4.3.15(b)	<p>The AER has developed the pro forma statement 7.1 at appendix A in order to assist TNSPs to provide to the AER the required information relating to the weighted average cost of capital. A TNSP must prepare and submit this pro forma statement to the AER as part of its revenue proposal.</p>	<p>TransGrid has submitted the Weighted average cost of capital pro forma as part of its revised revenue proposal included in Attachment T.</p>

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4.3.16	<p>(a) revenue proposal must contain:</p> <p>(1) the demand forecasts that the TNSP has used as the basis for its forecasts of operating and capital expenditure for the forthcoming regulatory control period</p> <p>(2) the assumptions on which the demand forecasts have been based, and full and detailed explanations of the basis of their preparation.</p> <p>(b) As a minimum, the TNSP's demand forecasts must be presented for each regulatory year of the regulatory control period. It is expected that the TNSP's demand forecasts will be in the same form as that provided to NEMMCO.</p>	<p>TransGrid has provided the demand forecasts and its impact on the Revenue Proposal in a separate letter with a suite of supporting documentation to the AER on the 22/8/08. The revised proposal is based on the same forecasts and assumptions.</p>
4.3.17	<p>revenue proposal must contain details of the estimated cost of corporate income tax calculated by the TNSP for the purposes of clause 6A.6.4 of the NER, together with a demonstration that the calculation complies with the requirements of that clause.</p>	<p>Refer to Revenue Proposal.</p>
4.3.18	<p>(a) Under clause 6A.5.1 (a) of the NER, a TNSP must prepare its revenue proposal using a post-tax revenue model according to the requirements of chapter 6A of the NER.</p> <p>(b) In accordance with clause 6A.10.2(c)(1)(i) of the NER, a TNSP's revenue proposal must be accompanied by a post-tax revenue model, completed in a manner that demonstrates its application to the TNSP.</p> <p>(c) Consistent with clause 6A.10.2(c)(2) of the NER, the completed post-tax revenue model and the information in that model will not be publicly disclosed without the consent of the TNSP, except to the extent that the information is provided or otherwise available apart from it being contained in that model.</p>	<p>A revised Post Tax Revenue Model has been submitted to the AER.</p>

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4.3.19	<p>(a) revenue proposal must be accompanied by:</p> <p>(1) a completed roll forward model</p> <p>(2) the TNSP's calculation of the regulatory asset base for the relevant transmission system for each regulatory year of the relevant regulatory control period using the roll forward model referred to in clause 6A.6.1 of the NER, together with:</p> <p>A. details of all amounts, values and other inputs used by the TNSP for the purpose of that calculation</p> <p>B. a demonstration that any such amounts, values and other inputs comply with the relevant requirements of part C of chapter 6 of the NER</p> <p>C. an explanation of the calculation of the regulatory asset base for each regulatory year of the relevant regulatory control period and of the amounts, values and inputs used to develop that calculation.</p> <p>(b) Consistent with clause 6A.10.2(c)(2) of the NER, the completed roll forward model and the information in that model will not be publicly disclosed without the consent of the TNSP, except to the extent that the information is provided or otherwise available apart from it being contained in that model.</p>	<p>The revised Roll-forward model has been submitted to the AER. The roll-forward methodology and calculation of Regulatory Asset Base is included in section 2 of the revised proposal.</p>
4.3.20	<p>(a) If requested to do so by the AER, a TNSP's revenue proposal must contain details of the information a TNSP intends to provide in support of any application made to the AER to pass through a positive pass through amount or a negative pass through amount under clause 6A.7.3 of the NER.</p> <p>(b) In accordance with clause 6A.17.2(f) of the NER, a TNSP must provide any written statement seeking the approval of the AER to pass through a positive pass through amount or a negative pass through amount according to any requirements specified in the information guidelines.</p>	<p>Refer to Revenue Proposal.</p>

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4.3.21	<p>If requested to do so by the AER, a TNSP's revenue proposal must contain the values that the TNSP proposes are to be attributed to self-insurance costs for each regulatory year of the relevant regulatory control period, together with:</p> <ul style="list-style-type: none"> <li>(a) details of all amounts, values and other inputs used by the TNSP to calculate its proposed self-insurance costs</li> <li>(b) an explanation of the TNSP's calculation of these amounts, values and inputs</li> <li>(c) the following information and reporting requirements: <ul style="list-style-type: none"> <li>A. a board resolution to self-insure (i.e. a copy of the signed minutes recording resolution made by the board)</li> <li>B. confirmation that the TNSP is in a position to undertake credible self insurance for those events</li> <li>C. self-insurance details setting out the specific risks the TNSP has resolved to self-insure</li> <li>D. a report from an appropriately qualified actuary or risk specialist verifying the calculation of risks and corresponding insurance premiums</li> <li>E. the annual regulatory accounts must record the cost of self-insurance as an operating expense and establish a self-insurance reserve</li> <li>F. when a claim against self-insurance is made, an appropriate deduction to the self-insurance reserve must be recorded.</li> </ul> </li> </ul>	<p>Refer to Revenue Proposal. Additional information to support the proposed self insurance cost is included in Section 5.3.3 of the revised revenue proposal. Refer to Attachment K for further details.</p>
4.3.22	<p>Revenue proposal must contain:</p> <ul style="list-style-type: none"> <li>(a) the name and description of each individual prescribed transmission service provided by the TNSP that is the subject of that revenue proposal</li> <li>(b) the quality, reliability and security of supply of each prescribed transmission service provided by the TNSP</li> <li>(c) the reliability, safety and security of the transmission system provided by the TNSP in the supply of prescribed transmission services.</li> </ul>	<p>Refer to Revenue Proposal.</p>
4.3.23	<p>Revenue proposal must contain a forecast map of the transmission system for the relevant regulatory control period. This map, together with any appropriate accompanying notes, should also indicate the location of new major network assets proposed to be constructed over the regulatory control period and should identify:</p> <ul style="list-style-type: none"> <li>(a) the different ratings of the transmission lines</li> <li>(b) other major network assets.</li> </ul>	<p>Future Network Map updated to include Wallaroo, submitted in Attachment R as part of the revised Revenue Proposal.</p>

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4.3.24	<p>Revenue proposal must contain the following:</p> <p>(a) details of the following information relating to any material related party transactions whose costs are attributed to, or allocated between, categories of transmission services provided by the TNSP:</p> <ul style="list-style-type: none"> <li>A. details of the related party</li> <li>B. the terms of the related party contract</li> <li>C. a description of the goods and/or services that are the subject of the transaction, and</li> <li>D. a description of the procurement process undertaken in respect of the goods and/or services that are the subject of the transaction, and, in particular, whether the procurement process was a competitive process.</li> </ul> <p>(b) The TNSP's confirmation that the terms and conditions of any related party contract that it has require the related party to provide sufficient information to the TNSP to enable the TNSP to meet obligations to attribute or allocate the costs of that related party contract under these guidelines.</p>	Refer to Revenue Proposal.