



Multinet Gas Partnership

2013-2017 Access
Arrangement Revision
Operating Expenditure
Forecasts

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1 Executive summary

Multinet has engaged KPMG to provide independent factual findings on:

- the arithmetic integrity of the calculation of Multinet’s operating expenditure forecasts; and
- the completeness of the scope of Multinet’s 5 year forecasts of operating expenditure for its Reference Services, and the bases of the principal sources of forecast operating expenditure including reporting any evidence of omission or duplication of categories of expenditure in Multinet’s forecasts that might be identified by the procedures KPMG carried out

to assist Multinet assess the completeness and accuracy of its operating expenditure forecasts for its Revised Access Arrangement.

1.1 Checks of arithmetic integrity of forecasting models

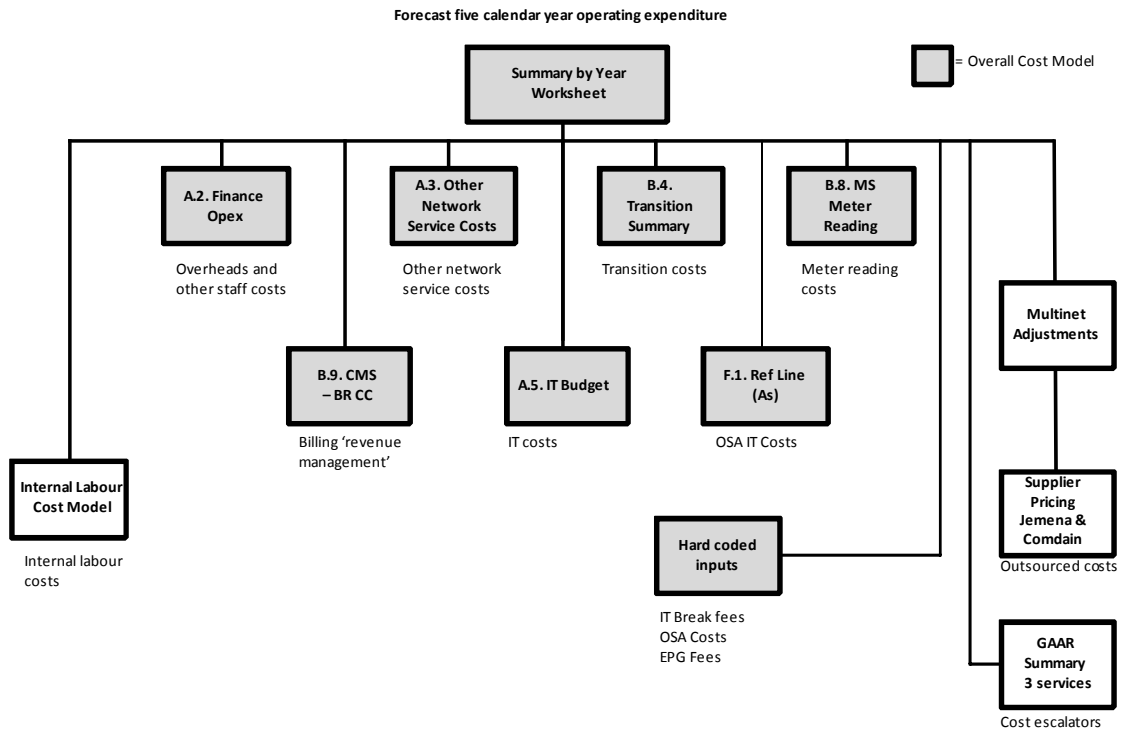
1.1.1 Scope

We carried out procedures that are detailed in this report, to check the arithmetic integrity of the following Excel workbooks insofar as they relate to Multinet’s forecast operating expenditure (“opex”):

- “*MGH Overall Cost Model JAM north Comdain south 27022012.xlsx*” (“*Overall Cost Model*”) – provided to KPMG on 29th February, 2012, with a revised version received on 15th March, 2012.
- “*Multinet BID Jemena Vols_NORTH_Draft 2.xlsx*” (‘*Supplier Pricing Jemena*’) – provided to KPMG on 1st March, 2012 with a revised version received on 15th March, 2012.
- “*TCE Sth_2011011_vSupplier Comdain South.xls*” (‘*Supplier Pricing Comdain*’) – provided to KPMG on 1st March, 2012 with a revised version received on 16th March, 2012.
- “*02122011 Multinet 7-13 Internal and Transition Costs Model 01032012.xlsx*” (‘*Internal Labour Cost Model*’) – provided to KPMG on 2nd March, 2012 with a revised version received on 16th March, 2012.

The revised versions included amendments made by Multinet as a result of matters arising from our procedures, we raised with Multinet.

The following diagram illustrates the sources of data that combine to provide Multinet’s five calendar year forecasts of operating expenditure.



1.2 KPMG’s other procedures

We undertook limited procedures selected by Multinet to meet its requirements. These procedures which examined the completeness of the scope of Multinet’s operating expenditure forecasts and certain aspects of the principal sources of information for forecast operating expenditure, are summarised below. The services provided in connection with this engagement comprise an advisory engagement which is not subject to Australian Auditing Standards or Australian Standards on Review or Assurance Engagements. An engagement conducted under those Standards could provide findings different to those of this report.

1.2.1 Completeness of scope of operating costs

KPMG developed a pro-forma ‘business model’ to identify the activities and corresponding costs necessary to deliver a Reference Service under the National Gas Rules. We developed a pro forma ‘business model’ for Multinet that describes:

- the activities necessary to deliver a Reference Service (under the National Gas Rules);
- the corresponding requirements for labour, bought in services, other operating costs and hence operating expenditure categories, implied by those activities.

KPMG compared this to the descriptions and scope of operating expenditure in Multinet’s forecasts, to provide evidence for whether Multinet’s forecasts includes the expected range of, but does not double count, reasonably expected operating expenditure categories.

1.2.2 In house labour costs

We:

- established principles that are appropriate for attributing or allocating expenditure between:
 - Multinet and UED; and
 - Multinet operating and capital expenditure;
- identified the bases on which Multinet has attributed or allocated expenditure; and
- comment on the consistency of those bases of attribution or allocation.

1.2.3 Jemena OSA expenditure

We compared the amounts of OSA cost forecast for the 6 months to 30 June 2013, the termination date of the OSA, to Multinet's calculations of the OSA costs due for that period set out in the workbook "MGH OSA FEE_NK_DC" received 27 March 2012.

1.2.4 Other internal costs

We reviewed a reconciliation that had been conducted by Multinet, to test the reasonableness of these forecasts.

1.2.5 TCE costs

We:

- agreed the operating expenditure forecast by the Overall Cost Model Summary to the outputs from the TCE tender templates completed by Jemena for the Northern Region of Multinet's network and Comdain for the Southern Region; and
- for Customer and Market Services only, provided commentary on how meter reading volume assumptions used to calculate costs in the Overall Cost models compare to historic data

1.2.6 EPG fees

We checked the forecast of EPG fees for the five years to a letter from DUET setting out the costs that the fee passes through and a draft letter from Ernst and Young that summarised checks and procedures it had carried out in the costs reported by DUET.

1.2.7 Basis of forecasts

We were also asked to briefly comment, with reference to Multinet's revision of its business model, on whether the use of "Year 4" costs from Multinet's 2008-2012 Access Arrangement Period would be relevant to the requirements of the National Gas Rules for forecasts of efficient operating expenditure for the 2013-2017 Access Arrangement Period

1.3 Findings

1.3.1 Arithmetic integrity of forecasting models

In summary:

- we found no issues in the transfer of forecast operating cost data from each of the source workbooks in the diagram, to the “Summary by Year” worksheet of the Overall Cost Model;
- we identified issues in the arithmetic calculations of total five year forecast operating expenditure in the “Summary by Year” worksheet of the Overall Cost Model; and
- we found issues in the arithmetic calculations in each of the source workbooks set out in the diagram above. All issues were reported to Multinet and we were satisfied that
 - they were satisfactorily addressed by Multinet in the revised workbooks provided to us on 15th and 16th March, 2012, referred to above; or
 - Multinet was able to demonstrate that the issues did not affect the five year total of forecast operating expenditure in the “Summary by Year” worksheet of the Overall Cost Model.

1.3.2 Other observations on forecasting models

The workbooks provided to us were not designed to be one consistent and dynamically linked Excel-model, clearly separated into inputs, calculations and outputs. Rather they were working documents, which were altered in various ways, for example to address specific reporting requirements. In particular, we noted the following general departures from what would be good practice for a formal financial model:

- a lack of clear division into inputs, calculations and outputs;
- a number of instances, in which long and highly complex formulas were included in one cell rather than being broken down into sub-steps across multiple cell ranges;
- a lack of dynamic links between workbooks and worksheets, with multiple instances of “hard-coded” values rather than formulas; and
- a lack of consistency in worksheet layout and formatting within and across workbooks.

While these shortcomings made checking efforts more time-intensive, they did not prevent us from completing the procedures and checks as outlined in this report. However, we emphasise that consequently:

- our findings apply only to the specific versions of the workbooks and worksheets that we examined; and
- that we strongly recommend that workbooks and spreadsheets be developed to be generally consistent with good modelling practice if they were to be used to develop forecasts for other scenarios or periods.

1.3.3 Completeness of scope of operating costs

The gaps identified between the pro-forma and Multinet's five year operating expenditure forecasts were discussed with Multinet's regulatory team to identify if the expenditure category had been included within Multinet's forecast. KPMG concluded that Multinet's forecasts include the range of reasonably expected costs.

1.3.4 In house labour costs

We found that:

- the bases of allocation utilised by Multinet to attribute and allocate internal costs between Multinet and UED, were consistent with generally accepted Australian regulatory principles and precedents for cost allocation; and
- consequently that internal labour costs had been fully allocated or attributed to Multinet's Reference Service without double counting.

We explain in this report that the AER can be expected to apply criteria provided by Accounting Standards to determine whether costs may be capitalised and we set out these criteria.

It appears reasonable to suggest that the internal labour costs that Multinet has forecast to be capitalised would meet these criteria. However, the assessments that Multinet has made to determine whether the assumptions on which forecast capitalised may be consistent with Accounting Standards have not been documented. Therefore, we suggest that Multinet may wish to satisfy itself that the costs it intends to capitalise set out at Appendix I of this document do in fact meet the criteria we have set out at Section 5.5.1.

1.3.5 Jemena OSA expenditure

Comparison of the total forecast OSA cost in the Overall Cost model Summary Sheet with Multinet's current estimates of the OSA payable in 2013, indicate that the forecast OSA expenditure could be understated by nearly \$1m in total. This is a non-recurring amount that arises only in 2013 and accounts for 0.3% of the total operating expenditure forecast for the 5 year period.

1.3.6 Other internal costs

The reconciliation we carried out suggests a potential under-forecast of \$0.5m of expenditure in total over five years.

1.3.7 TCE costs

The forecasts of outsourced operating expenditure in the Overall Cost Model Summary agreed to the TCE tender templates completed by Jemena for the Northern Region and Comdain for the Southern Region;

We also compared the following volume fields in the models to 2010 historic data provided to us by Multinet:

Meter reading

Service	Monthly charge volumes		
	2008 Actual mean	Estimate in model ¹	% Variation of estimate from actual mean
Bi-Monthly Scheduled Reads	315,659	316,667	0.3%
Monthly Scheduled Reads	166	208	25.3%
Special Reading	11,672	10,833	(7.2%)
Disconnections	484	1,083	123.8%
Special Investigations	26	33	26.9%
Additional Fee for Appointments	10	200	2,000%

We comment that:

- the great majority of forecast cost is associated with the bi-monthly meter reads where the volume estimates in the model align closely with the actual data; and
- while other volume data fields have greater percentage variances the amounts of cost they account for are significantly less.. We estimate that if the 2008 actual volumes were substituted for the estimates in the model the impact on the cost forecast would be to reduce it by about \$23,000 pa (about 0.9%) for the 4.5 years to June 2017. This difference does not appear to be material.

1.3.8 EPG fees

The nature of the EPG fee was examined in depth by the KPMG expert report “Examination of an annual fee for service payable to Energy Partnership (Gas) Pty Ltd”, October 2007. For the 2013 Access Arrangement Revision, we agreed the annual amount of \$3.941m (2011 dollars) in the operating expenditure forecasts to a draft letter from Ernst & Young indicating that it had carried out audit testing on this amount for the 2010 calendar year (expressed in 2010 dollars) and was in a position to sign off an audit report on this amount. We understood that at the time of our work, the final letter was not readily available but Multinet stated that it did not differ from the draft.

1.3.9 Bases of forecast

Within the National Gas Rules Division 2 “Access arrangement information relevant to price and revenue regulation” rule 74(2) “Forecasts and estimates” requires that:

- (2) *A forecast or estimate:*
- (a) *must be arrived at on a reasonable basis; and*
 - (b) *must represent the best forecast estimate possible in the circumstances.*

¹ Overall Cost model – Work Sheet B.8 CMS Meter Reading – Cells L25:L28 and L40:L41
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Multinet is currently revising its business model. This includes Multinet:

- significantly increasing the extent to which it undertakes business activities in house, with a corresponding reduction in its use of outsourced services. Many in house functions will be shared between Multinet and United Energy Distribution (UED); and
- conducting a competitive tender process for the provision of a revised scope of outsourced services. Multinet currently purchases outsourced services from Jemena Asset Management under a single Operating Services Agreement (OSA).

These are intended to be a long-term changes to Multinet's business model and will extend throughout and beyond the 2013-2017 Access Arrangement period. Multinet's intentions to implement these changes are evidenced by the considerable progress it has already made instigating change (for example by running a lengthy tender process for revised outsourced services) and by the precedent provided by UED which has implemented complementary change referred to above of a similar nature and bringing many functions in house in anticipation of sharing functions with Multinet.

Multinet's "Year 4" expenditure (calendar year 2011) reflects a business model that is being superseded and will not be representative of Multinet's cost structures beyond the first six months of the 2013-2017 Access Arrangement period.

On the other hand, Multinet's operating expenditure forecasts included in its Access Arrangement information is based on assumptions that are consistent with the revised business model that Multinet is in the process of implementing.

Therefore, it is reasonable to conclude that the operating expenditure forecast in Multinet's Access Arrangement rather than a forecast based on "Year 4" expenditure fulfils the requirements of NGR r 74. This is because the forecast is derived on a reasonable basis reflective of intended future cost structures while a forecast based on Year 4 expenditure, could not represent the best forecast or estimate possible in the circumstances.

2 Introduction and approach

2.1 Background

The Multinet Gas Partnership (Multinet) is preparing its proposed revision to its Access Arrangement for the provision of gas pipeline services for the calendar years 2013 to 2017. Multinet is required to submit its proposed revision to the Australian Energy Regulator (AER) for approval, no later than 31 March 2012.

To support its Access Arrangement revision, Multinet will submit forecasts of operating and capital expenditure for the five years commencing 1 January 2013.

Multinet is also currently revising its business model. This includes Multinet:

- significantly increasing the extent to which it undertakes business activities in-house, with a corresponding reduction in its use of outsourced services. Many in-house functions will be shared between Multinet and United Energy Distribution (UED); and
- conducting a competitive tender process for the provision of a revised scope of outsourced services. Multinet currently purchases outsourced services from Jemena Asset Management under a single Operating Services Agreement (OSA).

For the first six months on the Access Arrangement Period Jemena will continue to provide outsourced services under the OSA.

When the OSA expires in June 2013, Multinet will enter into new separate, outsourcing agreements for the provision of:

- network services (“opex and small capex”) for a ‘Northern Region’ of its network;
- network services (“opex and small capex”) for a ‘Southern Region’ of its network;
- whole of network ‘large capex’ asset management services;
- Customer and Market Services (billing, back office, meter reading and customer contact centre); and
- IT infrastructure management and project delivery services.

2.2 Scope

The purpose of this report is to provide independent commentary on:

- the completeness of the scope of Multinet’s forecasts of operating expenditure for providing its Reference Services, including reporting on any evidence of omission or duplication of categories of expenditure in Multinet’s forecasts; and
- the arithmetic integrity of the calculation of Multinet’s operating expenditure forecasts.

The commentary is to provide independent factual findings to assist Multinet to assess the completeness and accuracy of its operating expenditure forecasts for its proposed Access Arrangement revision. We also understand that Multinet may submit this report to the AER to inform the AER’s consideration of Multinet’s proposed Access Arrangement revision.

2.3 Approach

We have:

- developed a pro forma ‘business model’ for Multinet that describes:
 - the activities necessary to deliver a Reference Service (under the National Gas Rules); and
 - the corresponding requirements for labour, asset utilisation and bought in services and hence operating expenditure categories, implied by those activities.

The purpose of the pro forma is to help demonstrate whether Multinet’s forecasts includes the expected range of, but do not double count, reasonably expected operating expenditure categories. This was done by comparing the descriptions and scope of operating expenditure in Multinet’s forecasts, with descriptions and scope in the pro forma.

- undertaken procedures which examined certain aspects of the processes that Multinet has followed to produce its expenditure forecasts;
- undertaken checks on the arithmetic integrity and completeness of calculation of the models that Multinet has used to provide its forecasts of operating expenditure; and
- provided in the Executive Summary a brief commentary, with reference to Multinet’s revision of its business model, on whether the use of “Year 4” costs from Multinet’s 2008-2012 Access Arrangement Period would be relevant to the requirements of the National Gas Rules for forecasts of efficient expenditure for the 2013-2017 Access Arrangement Period

2.4 Brief overall description of operating expenditure forecast

The matrix below illustrates four high level principal functional areas under which Multinet classifies its operating expenditure, and the corresponding five potential sources of information for forecast costs. We understand that this table or a table very similar to this, populated with costs, will be presented in Multinet’s Access Arrangement Information to provide a total of operating expenditure for the five year Access Arrangement Period.

	Sources of forecast expenditure					
Functional areas	<i>Labour costs</i>	<i>Jemena OSA Costs</i>	<i>Direct Costs</i>	<i>Tender Bids</i>	<i>EPG² fee</i>	Total
<i>Network operations</i>						
<i>Customer and Market Services</i>						
<i>IT Services</i>						
<i>Corporate services</i>						
Total						

Subsequent sections of this report describe procedures that we have carried out on each of these sources of information, and the factual findings arising from these procedures.

We also carried out procedures to provide factual findings the arithmetic integrity of the following models in so far as they relate to Multinet’s forecast operating expenditure:

- “*MGH Overall Cost Model JAM north Comdain south 27022012.xls*” (“*the Overall Cost Model*”) – received 29th February 2012
- “*Multinet BID Jemena Vols_NORTH_Draft 2.xlsx*” – received 1st March 2012
- “*TCE Sth_2011011_vSupplier Comdain South.xls*” – received 1st March 2012
- “*02122011 Multinet 7-13 Internal and Transition Costs Model 01032012.xls*” – received 2nd March 2012.

Section 3 of this report summarises our factual findings on the arithmetic integrity of the models.

Disclaimer

Inherent Limitations

This report has been prepared as outlined in the Scope Section. The services provided in connection with this engagement comprise an advisory engagement which is not subject to Australian Auditing Standards or Australian Standards on Review or Assurance Engagements, and consequently no opinions or conclusions intended to convey assurance have been expressed.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by, Multinet Gas Partnership management and personnel consulted as part of the process, unless otherwise noted within the report.

² Energy Partnership (Gas) Pty Ltd
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KPMG have indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

KPMG is under no obligation in any circumstance to update this report, in either oral or written form, for events occurring after the report has been issued in final form.

The findings in this report have been formed on the above basis.

Third Party Reliance

This report is solely for the purpose set out in the Scope Section and is not to be used for any other purpose or distributed to any party other than the Multinet Gas Partnership or the Australian Energy Regulator without KPMG's prior written consent.

Accordingly, KPMG accepts no responsibility in any way whatsoever for the use of this report for any purpose other than that for which it has been prepared.

3 Examination of operating cost forecast workbooks

3.1 Introduction

This section of the report describes the procedures we conducted on workbooks and spreadsheets used by Multinet to develop its forecasts of operating expenditure for the 2013-2107 Access Arrangement period, and our findings from those procedures..

3.2 The workbooks we examined

Multinet provided a number of Excel workbooks for examination. The original workbook names used by Multinet were simplified to ease understanding and reporting. The following table outlines the original names, the date on which each workbook was received as well as the simplified name. These simplified names are used in the following sections.

The following workbooks were originally received.

Original Workbook Name	Date Received	Simplified Workbook Name
MGH_OverallCostModel_JAM north Comdain south 27022012	29-Feb-12	1 Overall Cost Model
Multinet BID_Jemena Vols_NORTH_Draft 2	01-Mar-12	2 Supplier Pricing Jemena
TCE Sth_20111011_vSupplier Comdain South	01-Mar-12	3 Supplier Pricing Comdain
02122011 Multinet 7-13 Internal and Transitions Costs Model 01032012	02-Mar-12	4 Internal Labour Cost

Multinet subsequently provided updated copies that included amendments made by Multinet to address matters that our procedures had brought to our attention.

Revised Workbook Name	Date Received	Simplified Workbook Name
MGH_OverallCostModel_JAM north Comdain south 08032012 4 pm v2	15-Mar-12	1 Overall Cost Model
Multinet BID_Jemena Vols_NORTH_Draft 3	15-Mar-12	2 Supplier Pricing Jemena
TCE Sth_20111011_vSupplier Comdain South	16-Mar-12	3 Supplier Pricing Comdain
02122011 Multinet 7-13 Internal and Transitions Costs Model 17012012 v2	16-Mar-12	4 Internal Labour Cost

3.3 Components of the operating cost forecast

The “Summary by Year” worksheet of the Overall Cost Model summarises the 5 year operating cost forecasts. It draws on data and calculations set out in a number of other worksheets contained within the Overall Cost Model as well as other Excel workbooks. The functional flow of information is outlined in the flowcharts in Appendix A.

Our examination focused on worksheets relevant to the forecast of Multinet’s operating costs for the next Access Arrangement Period. Therefore, worksheets which were dedicated to capital expenditure calculations only, were excluded from our examination.

The Excel workbooks and corresponding worksheets, which were included in our examination, are presented in the table below:

Simplified Workbook Name	Original Workbook Name	Worksheet Name
"1 Overall cost model"	MGH_OverallCostModel_Jam north Comdain south 27022012.xls	Description
		Summary by Year
		A1. Summary - Labour
		A2. Finance Opex Forecast
		A3. Other Ntwk Svcs Costs
		A5. IT Budget
		B1. Opex (N)
		B2. Opex (S)
		B3. Network-NSP Transition
		B4. Transition Summary
		B5. TCE-Reg code lookup
		B8. CMS - Meter Reading
		B9. CMS - BR_CC
		F1. Ref Line (AS)
		F2. Forecast (AS)
		F3. Summary (AS)
		F6. Other Operating
F7. RAS 7- Meters		
"2 Supplier Pricing Jemena"	Multinet BID_Jemena Vols_NORTH_Draft 2	NSP
		P&L
		2. Summary (N/S)
		3. Opex Cost Summary (N/S)
		5. Limb 2 Margin
		6. Opex
		8. Volumes and Descriptions
		9. FTE Requirements
		10. Cost Increase Forecast
		11. Productivity Forecast
"3 Supplier Pricing Comdain"	TCE Sth_20111011_vSupplier Comdain South	A1. Assumptions - Forecasts
		A2. Assumptions - Network OpFTE
		A3. Assumptions - Opex
		A5. Assumptions - Volumes
		A2. FTE Assumptions
		B1. Summary - Labour Costs
"4 Internal Labour Cost"	02122011 Multinet 7-13 Internal and Transitions Costs Model 01032012	B2. Summary - FTE
		B3. Summary - OH
		B4. Summary - Internal Opex
		B5. Full Year Effect
		C1. FTE Budget Amended
		C1b. FTE Budget Amended 2011
		C2. Finance Opex Forecast
		C3. Finance Opex FY12
		C4. IT FY12 Reforecast
		C5. BudgetForecastAssump
		D1. Internal Trans Costs Summ
		D2. Compiled Transition
		D3. CMS,IT Trans
		D4. Other Transition
		D5. Redundancy
		D6. Multinet Roles
		D7. Operations-JAM

Simplified Workbook Name	Original Workbook Name	Worksheet Name
		D8. Asset Management-JAM
		IT CMS
		Differ NSP Calc
		JAMShouldCost
		Netw Both Regions
		Netw TCE Summary
		Netw TCE Tran Cost
		One Region Scenario calcs

3.4 Procedures

3.4.1 Introduction

We applied what we have termed “General procedures” to all the worksheets other than those which were dedicated to capital expenditure calculations only. These general procedures are outlined below. Appendix B illustrates the worksheets, to which the general procedures were applied and shows how the different worksheets interlink.

In addition, worksheet-specific tests were carried out as described in sections 3.4.3, 3.4.4 and 3.4.5, below.

The results of all checks are summarised in section 3.5 with the full list of checks and findings at Appendix B.

3.4.2 General procedures

The following procedures were carried out on all non-Capex worksheets where applicable:

- check that totals and subtotals are arithmetically correct and refer to the appropriate cell ranges;
- check that formulas are consistent within blocks of cells (using formula auditing tools); and
- within each consistent block of formulas, check (for one representative cell) that the formula is arithmetically correct and, where applicable, refers to an appropriate input range.

Since the two models containing supplier pricing data (“2 Supplier Pricing Jemena” and “3 Supplier Pricing Comdain”) are very similar, simplified checking procedures were applied to the Excel workbook containing the Comdain data.

3.4.3 Specific procedures - Overall Cost Model

This section outlines checks which were carried out only for specific worksheets in addition to the general procedures outlined above.

Worksheet: Summary by year

This sheet provides totals of expenditure for each calendar year of the Access Arrangement Period, and for each corresponding financial year.

- Check whether:
 - for each operating cost component disclosed on the face of the Summary sheet, the cost component matches the information in the corresponding source (i.e. has been properly extracted from the supporting worksheet). This check includes a check that the cost component for the appropriate period (i.e. calendar not financial year) has been extracted; and
 - all conversions between \$, \$'000 and \$'m etc have been carried out properly each time a figure is transferred from one spreadsheet or model to another.
- For outsourced maintenance, operations and transition costs, check that these costs are correctly transferred over from the respective source sheets.
- Check the basis on which OSA costs (Network operations and CMS components) are included in the forecast model.
- Check the bases on which the Meter Reading costs and Billing and Revenue Marginal costs have been calculated and seek Multinet's confirmation that these rules accord with its interactions.
- Check rationale behind hard-coded \$ values and obtain further supporting evidence, where appropriate.
- Check that cost escalators in summary sheet represent relevant cost escalators that have been properly calculated in the source model "GAAR Summary 3 scenarios 22.02.xlsx".
- Check that the labour costs correspond to the outputs of the Internal Labour Cost Model.

Worksheet: Description

- Print a copy of this worksheet and check that all elements of the diagram are included in the 'Summary by Year' worksheet.

Worksheet: A.1 Summary Labour

- For the calendar years of the 2013-2017 Access Arrangement Period:
 - Check that the totals of labour cost on this worksheet correspond to the total on the source worksheet.

Worksheet: A.2 Finance Opex

- For the calendar years of the 2013-2017 Access Arrangement Period:
 - Check that the total of variable overhead, fixed overhead and other staff cost on this worksheet corresponds to the total on the summary worksheet.

Worksheet: A.3 Other Network Service Costs

- For the calendar years of the 2013-2017 Access Arrangement Period:
 - Check that the total of cost on this worksheet corresponds to the total in the summary worksheet.

Worksheet: B.4 Transition Summary

- For the calendar years of the 2013-2017 Access Arrangement Period:
 - Check that the total of cost on this worksheet corresponds to the total in the summary worksheet.

Worksheet: B.1 Opex (N) B.2 Opex (S)

- For the calendar years of the 2013-2017 Access Arrangement Period:
 - Check that the total of cost on this worksheet corresponds to the total in the summary worksheet.

Worksheet: B.8 CMS – Meter Reading

- Check that the outputs of this worksheet properly flow through into the ‘Summary by Year’ worksheet e.g. into cell E46.
- If some of the data in this worksheet was copied over from one of the other three workbooks, check that values were pasted across correctly.

Worksheet: B.9 CMS – BR CC

- Check that the outputs of this worksheet (mainly located in rows 174 to 179) properly flow through into the ‘Summary by Year’ worksheet.
- Check that all data within this worksheet flows through into rows 174 to 179.
- If some of the data in this worksheet was copied over from one of the other three workbooks, check that values were pasted across correctly.

Worksheet: A.5 IT Budget

- For the calendar years of the 2013-2017 Access Arrangement Period:
 - Check that the totals of IT opex on this worksheet correspond to the totals of IT opex in the summary worksheet.

Worksheet: F.1 Ref Line (AS)

- Check that the costs, which were extracted into the Summary spreadsheet, represent IT (OSA) costs.

3.4.4 Specific procedures - Supplier Pricing Jemena & Supplier Pricing Comdain

Due to the great similarity between these two workbooks, the same procedures were applied to both.

Worksheet: 2. Summary (N/S)

- Check that the Opex grand totals match those of the source worksheets.

Worksheet: 3. Opex Cost Summary (N/S)

- Check that the Opex grand totals match those of the source worksheets. Consider Limb 2 margin where appropriate.

Worksheet: 6. Opex

- Check that the Opex grand totals match those in the summary worksheet. Consider Limb 2 margin where appropriate.

3.4.5 Specific procedures - Internal Labour Cost Model

B1. Summary – Labour Cost

- Check that the data was correctly copied into this worksheet from other worksheets, e.g. from “C1. FTE Budget Amended”.

Worksheet: B4. Summary - Internal Opex

- Check the build-up of costs from the other two worksheets to ensure that there are no lost items and no double counting.

Worksheet: C1. FTE Budget Amended

- Check that the data of this worksheet correctly flows through into the “B1. Summary” worksheet.
- Check that for staff with a “start date” of 1 July 2013 or later, no cost is split between UED and MGDP since the new outsourcing arrangement comes into effect after that date.

3.5 Summary of Findings

This section summarises the findings for each workbook, which arose from applying the checking procedures outlined above. The full list of identified issues, responses and remedial actions is available in Appendix B.

No material issues were identified in the workbooks provided to us, which were not corrected or resolved in the revised versions. Please refer to section 3.2 for a list of workbook names and the dates at which they were received as well as Appendix B for the full list of findings, responses and remedial actions undertaken.

We carried out checking of the revised workbooks, which was solely focused on ensuring that the identified issues were resolved. We did not re-check any parts of the workbooks, which had “no issues identified” in the previous checking steps.

Simplified Workbook Name	Original Workbook Name	Worksheet Name	Summary of Findings
"1 Overall cost model"	MGH_OverallCostModel_JamnorthComdain_south27022012.xls	Description	-
		Summary by Year	Seven issues identified and reported. Five issues were corrected in the revised version. The remaining two issues were resolved by additional supporting documentation being made available.
		A1. Summary - Labour	One issue identified and reported. The issue was corrected in the revised version.
		A2. Finance Opex Forecast	Three issues identified and reported. Two issues were corrected in the revised version. The remaining issue was resolved by additional supporting documentation being made available.
		A3. Other Ntwk Svcs Costs	No issues noted.
		A5. IT Budget	One issue identified and reported. After further discussion and investigation, it was agreed that this issue does not affect the calculation of the Opex forecast for the next regulatory period.
		B1. Opex (N)	One issue identified and reported. The issue was corrected in the revised version.
		B2. Opex (S)	One issue identified and reported. After further discussion and investigation, it was agreed that this issue does not affect the calculation of the Opex forecast for the next regulatory period.
		B3. Network-NSP Transition	One issue identified and reported. Further discussion and investigation revealed that the data in question was correctly reflected in the total of the summary worksheet.
		B4. Transition Summary	No issues noted
		B5. TCE-Reg code lookup	No issues noted
		B8. CMS - Meter Reading	One issue identified and reported. It was noted that this issue is considered immaterial concerning the overall Opex forecast for the next regulatory period.
		B9. CMS - BR_CC	No issues noted
		F1. Ref Line (AS)	No issues noted
		F2. Forecast (AS)	No issues noted
		F3. Summary (AS)	No issues noted
		F6. Other Operating	No issues noted
		F7. RAS 7- Meters	No issues noted
		NSP	One issue identified and reported. After further discussion and investigation, it was agreed that this issue does not affect the calculation of the Opex forecast for the next regulatory period.
		P&L	No issues noted
"2 Supplier Pricing Jemena" & "3 Supplier Pricing Comdain"	Multinet BID_Jemena Vols_NORTH_Draft 2 & TCE Sth_20111011_vSupplier	2. Summary (N/S)	One issue identified and reported (in both the Jemena and Comdain versions). The issue was corrected in the revised version.
		3. Opex Cost Summary (N/S)	No issues noted
		5. Limb 2 Margin	No issues noted
		6. Opex	One issue was identified and reported (in both the Jemena and Comdain versions). The issue did not affect the calculation of the Opex forecast for the next regulatory period. Moreover, an additional issue was identified in the Jemena version. This issue was corrected in the revised

Simplified Workbook Name	Original Workbook Name	Worksheet Name	Summary of Findings
	r Comdain South		version.
		8. Volumes and Descriptions	No issues noted
		9. FTE Requirements	No issues noted
		10. Cost Increase Forecast	No issues noted
		11. Productivity Forecast	No issues noted
		A1. Assumptions - Forecasts	No issues noted
		A2. Assumptions - Network OpFTE	No issues noted
		A3. Assumptions - Opex	No issues noted
		A5. Assumptions - Volumes	No issues noted
"4 Internal Labour Cost"	02122011 Multinet 7-13 Internal and Transitions Costs Model 01032012	A2. FTE Assumptions	No issues noted
		B1. Summary - Labour Costs	Two issues identified and reported. After further discussion and investigation, it was agreed that these issue do not affect the calculation of the Opex forecast for the next regulatory period.
		B2. Summary - FTE	No issues noted
		B3. Summary - OH	Three issues identified and reported. After further discussion, it was agreed that for two of the issues the cell content was indeed correct. The remaining issue was without impact on the Opex forecast for the next regulatory period.
		B4. Summary - Internal Opex	Two issues identified and reported. One issue was corrected in the revised version. The other issue was without impact on the calculation of the Opex forecast for the next regulatory period.
		B5. Full Year Effect	-
		C1. FTE Budget Amended	One issue identified and reported. After further discussion and investigation, it was agreed that this issue does not affect the calculation of the Opex forecast for the next regulatory period.
		C1b. FTE Budget Amended 2011	One issue identified and reported. After further discussion and investigation, it was agreed that this issue does not affect the calculation of the Opex forecast for the next regulatory period.
		C2. Finance Opex Forecast	Five issues identified and reported. After further discussion and investigation, it was agreed that these issues do not affect the calculation of the Opex forecast for the next regulatory period.
		C3. Finance Opex FY12	Three issues identified and reported. After further discussion and investigation, it was agreed that these issues do not affect the calculation of the Opex forecast for the next regulatory period.
		C4. IT FY12 Reforecast	No issues noted
		C5. BudgetForecastAssump	No issues noted
		D1. Internal Trans Costs Summ	One issue identified and reported. The issue was corrected in the revised version.
		D2. Compiled Transition	Twelve issues identified and reported. After further discussion and investigation, it was agreed that these issues do not affect the calculation of the Opex forecast for the next regulatory period.
	D3. CMS,IT Trans	No issues noted	

Simplified Workbook Name	Original Workbook Name	Worksheet Name	Summary of Findings
		D4. Other Transition	Two issues identified and reported. After further discussion and investigation, it was agreed that these issues do not affect the calculation of the Opex forecast for the next regulatory period.
		D5. Redundancy	No issues noted
		D6. Multinet Roles	No issues noted
		D7. Operations-JAM	One issue identified and reported. After further discussion and investigation, it was agreed that this issue does not affect the calculation of the Opex forecast for the next regulatory period.
		D8. Asset Management-JAM	No issues noted
		IT CMS	No issues noted
		Differ NSP Calc	No issues noted
		JAMShouldCost	One issue identified and reported. After further discussion and investigation, it was agreed that this issue does not affect the calculation of the Opex forecast for the next regulatory period.
		Netw Both Regions	No issues noted
		Netw TCE Summary	Seven issues identified and reported. After further discussion and investigation, it was agreed that these issues do not affect the calculation of the Opex forecast for the next regulatory period.
		Netw TCE Tran Cost	One issue identified and reported. After further discussion and investigation, it was agreed that this issue does not affect the calculation of the Opex forecast for the next regulatory period.
		One Region Scenario calcs	No issues noted

4 Pro-forma ‘business model’

4.1 Introduction

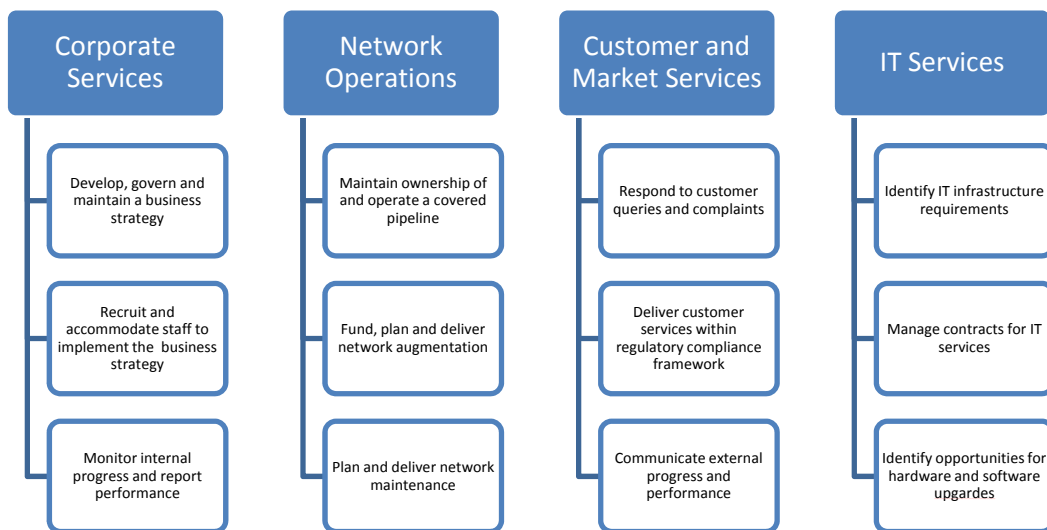
This section describes the pro-forma ‘business model’ used to identify:

- the activities necessary to deliver a Reference Service under the National Gas Rules; and
- the corresponding requirements for labour and bought in services (and hence categories of cost) implied by those activities.

The objective of the pro-forma ‘business model’ is to help demonstrate whether Multinet’s forecasts include the expected range of, but do not double count, reasonably expected cost categories. This is achieved by comparing the descriptions and scope of costs in the pro-forma with the descriptions and scope of expenditure in Multinet’s forecasts.

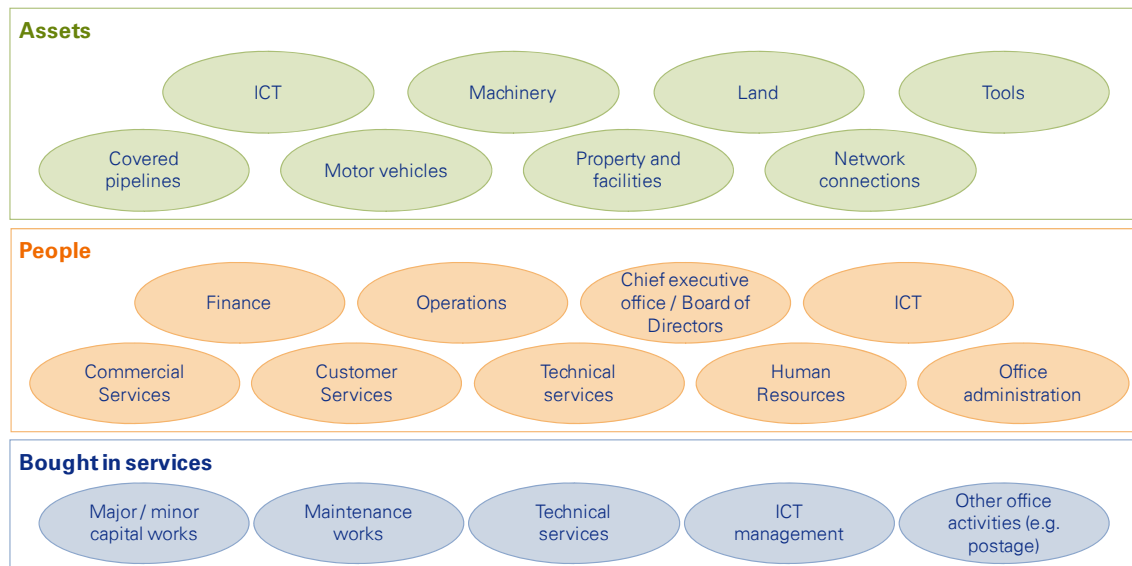
4.2 Activities of a gas network business

A gas networks business owns the distribution network assets used to transport gas from the high-pressure transmission network to the premises of residential, commercial and industrial gas users. The key high level, generic activities are shown in the diagram below:



4.3 Costs of a gas networks business

A gas networks business will incur a variety of costs to deliver the activities identified above. This is shown in the diagram below:



The costs identified as “Assets” may require capital expenditure (capex) or could include hired or leased assets (e.g. motor vehicles, IT equipment, etc). The costs identified as “People” and “Bought in services” require operational expenditure (opex).

4.4 Cost catalogue

Based upon the activities and cost types of a gas networks business it is possible to develop a cost catalogue. The cost catalogue can then be compared to the descriptions and scope of expenditure in Multinet’s forecasts. The two key types of operational cost for this exercise are:

- 1 Labour positions; and
- 2 Other direct costs.

The cost catalogue identified by the pro-forma business model is shown in Appendix C.

4.5 Gap analysis between cost catalogue and Multinet’s forecasts

KPMG conducted a gap analysis by comparing the descriptions of costs in the cost catalogue with the descriptions and scope of expenditure in Multinet’s forecasts. Where a potential gap was identified, this was noted and discussed with the Multinet team.

The table below shows the potential gap identified by KPMG and the corresponding response from Multinet.

4.5.1 Labour positions

Potential gap identified	Multinet response	Reference ³	Outcome
Non-executive directors	Included as “Board costs”	C3. Finance Opex FY12, Row 42	No gap identified
Investor relations manager	Included in EPG fee	See “EPG fee” in “Overall Cost Model”	No gap identified
Financial risk manager	Included as “Risk Manager”	C1. FTE Budget Amended, Row 49	No gap identified
Recruitment manager	Included as “HR advisor”. Recruitment agency costs included as “Recruitment cost”	C1. FTE Budget Amended, Row 40 & 41 and C3. Finance Opex FY12, Row 16 (note Recruitment costs included in “Transition costs”)	No gap identified
Training manager	Included as “HR advisor”	C1. FTE Budget Amended, Row 40 & 41	No gap identified
ICT contracts manager	Included as a role divided between “Manager IT service delivery” and “Commercial manager (IT)”	C1. FTE Budget Amended, Row 56 & 98	No gap identified
Insurance officer	Included as “Assistant Company Secretary”	C1. FTE Budget Amended, Row 62	No gap identified
Mail room manager	Included as part role of “Administration Mgr”	C1. FTE Budget Amended, Row 66	No gap identified
Records manager	Included as part role of “Administration Mgr”	C1. FTE Budget Amended, Row 66	No gap identified
Manager government relations	Included as a role divided between “Communications & Corporate Affairs Manager” and “Regulatory services Manager”	C1. FTE Budget Amended, Row 37 and 298	No gap identified
Customer relations administrative assistant	Included as “CMS admin support”	C1. FTE Budget Amended, Row 112	No gap identified

³ All sheet and cell references refer to the “Internal Labour Cost” model unless otherwise stated.

4.5.2 Other direct costs

Potential gap identified	Multinet response	Reference ⁴	Outcome
Postage and courier costs	Included in “Other internal costs”	C3. Finance Opex FY12, Row 214	No gap identified
ASX annual listing fees	Not applicable	Not applicable	No gap identified
ASIC company registration fees	Not applicable	Not applicable	No gap identified
Consultancy costs	Included as “Consulting” and aggregated from functional estimates on consultancy expenditure	C3. Finance Opex FY12, Row 214	No gap identified
Vehicle fleet	Minimal Multinet owned vehicles. Contractors vehicle costs included in contract value.	Not applicable	Potential underestimation of costs but likely to be immaterial

4.6 Conclusion

KPMG concluded that Multinet’s forecasts include the range of reasonably expected costs.

⁴ All sheet and cell references refer to the “Internal Labour Cost” model unless otherwise stated.

5 Other procedures and factual findings

5.1 (In house) Labour costs

Labour costs are derived by Multinet applying labour rates or salaries (including on costs) to forecast staffing structures set out in organisation charts for Multinet, or for Multinet and UED combined where the labour relates to services shared between the 2 businesses.

Forecast labour costs are then attributed or allocated:

- between Multinet and UED on an employee-by-employee basis; and then within Multinet
- between Multinet operating and capital expenditure, where it may be appropriate to do so.

5.1.1 Procedures

We:

- established principles that are appropriate for attributing or allocating expenditure between:
 - Multinet and UED; and
 - Multinet operating and capital expenditure;
- identified the bases on which Multinet has attributed or allocated expenditure; and
- commented on the consistency of those bases of attribution or allocation with the principles we established.

Principles for attributing or allocating expenditure

The purpose of allocating expenditure in Multinet's operating expenditure forecasts is to derive forecasts of operating expenditure attributable to a reference service that are consistent with the National Gas Rules (NGR).

In particular, NGR rule 93(2) provides guidance on how costs are to be allocated between reference and other services:

- (2) *Costs are to be allocated between reference and other services as follows:*
- (a) *costs directly attributable to reference services are to be allocated to those services; and*
 - (b) *costs directly attributable to pipeline services that are not reference services are to be allocated to those services; and*
 - (c) *other costs are to be allocated between reference and other services on a basis (which must be consistent with the revenue and pricing principles) determined or approved by the AER.*

We note that:

- the AER has not published principles for cost allocation under the NGR; and
- the term “*directly attributable*” is not a defined term within the NGR or the preceding National Third Party Access Code for Gas Pipeline Systems (the Gas Code). It is therefore necessary to make a reasonable interpretation of “*directly attributable*”.

We have referred to precedents from the AER.

In its draft “*Regulatory Reporting Guidelines for Gas Pipeline Service Providers*” the AER defines “*Directly Attributable*” such that:

“An item is Directly Attributable to an object such as a Covered Pipeline, if it is wholly and exclusively associated with that object.”⁵

We also note that this definition is also used by the AER in its proposed “*Cost Allocation Guidelines for Electricity Network Service Providers*” (April 2008), and a range of precedent cost allocation guidelines from jurisdictional access regulators have also employed definitions with a similar substantive effect.

In the absence of guidance from the AER, we are obliged to make reasonable assumptions about the basis on which the AER would accept an allocation, under Rule 93 (2) (c).

While the AER/ACCC *Draft Regulatory Reporting Guidelines for Gas Pipeline Service Providers* did not provide guidance additional to the Gas Code, the AER’s “*Cost Allocation Guidelines for Electricity Service Providers*”(September 2007) implements the cost allocation criteria of the National Electricity Rules (NER). In particular the National Electricity Rules require that material shared costs should be allocated on a *causal* basis (Rule 6.15, National Electricity Rules).

Accordingly, we suggest that where possible, a causal basis of allocation is appropriate for shared costs.

This is because:

- it provides an appropriate approximation to the triggers of consumption of services and resources by a reference service; and
- it is consistent with a wide range of regulatory precedents, including guidelines published by the AER.

This in turn requires a definition of “causal”. However, neither the NER nor the guidelines published by the AER appear to define “*causation*” or “*causal*”. In the absence of guidance from the AER on the definition of ‘*causal*’, we have referred to the Office of the Regulator General (Victoria) (ORG) Electricity Industry Guideline No. 3, Issue published on 14 November 1997 which contained the following definition of causal:

“in relation to a basis of allocation, that the allocator is a trigger of the consumption or utilisation of resources or services represented by the costs or other account item, subject to the allocation”.

⁵ Glossary: draft Regulatory Reporting Guidelines for Gas Pipeline Service Providers. May 2004, www.aer.gov.au
14260923_1 - 29 March 2012

This provided a precedent for definitions in other Australian regulatory guidelines published since then.

Where it is not possible or practical to establish a causal relationship, there is a body of Australian regulatory precedent for applying a non-causal allocator as a method of allocating shared costs.

This precedent extends back to 1997 with the ORG Electricity Industry Guideline No. 3, Issue 2, and includes the National Electricity Rules and AER guidelines. For example:

- the AER's Electricity Cost Allocation Guidelines (September 2007) paragraph 2.2.4 specifies that in accordance with the requirements of clause 6A.19.2(3)(ii) of the National Electricity Rules, shared costs incurred in providing different categories of transmission service are allocated using an appropriate causal allocator, except to the extent:
 - *the shared costs are immaterial; or*
 - *a causal relationship cannot be established without undue cost and effort.*

The principles that UED and Multinet have used to allocate expenditure between them is set out in the Multinet Paper "Personnel Expenses Allocation between UED and Multinet", dated 21 April 2011.

This explains:

- an intention to book all Personnel expenses to the Pacific Indian Energy Services (PIES) entity and then to allocate all of the costs to UED and/or Multinet;
- a FTE allocation methodology for Personnel expenses only, comprising:
 - salaries;
 - contractors, agency temporary staff;
 - payroll tax;
 - worker's compensation;
 - superannuation employee contributions;
 - novated lease costs; and
- an allocation approach that is entirely consistent with the principles that we have described above.
- Accounting Standards provide statutory principles that guide the allocation of expenditure to operating or capital expenditure. Therefore, we suggest that Multinet's financial accounting policy for capitalisation, which is required by the *Corporations Act 2001*⁶ to be consistent with Accounting Standards, provides appropriate principles for the allocation of expenditure between operating and capital expenditure.

⁶ Section 296

The basis of Multinet's attribution of internal labour costs to operating and capital expenditure

In our experience, access regulators invariably require financial information to be prepared under Accounting Standards except where a regulator may explicitly specify otherwise. The most common exception is for customer contributions to be credited to capital rather than revenue for example. We are not aware of any specific requirements of the AER with regard to the accounting framework that Multinet should follow to prepare its operating expenditure forecasts. On this basis, Accounting Standards provide appropriate principles for attributing expenditure to operating or capital expenditure.

For the sake of brevity, we do not provide a full discussion of the application of Australian Accounting Standards to the question of whether to capitalise expenditure. However, in broad terms, we have referred to the following overarching principles provided by Accounting Standards:

- an asset (e.g. capitalised expenditure) is defined as:
 - “A resource:
 - a) *Controlled by an entity as a result of past events; and*
 - b) *From which future economic benefits are expected to flow*”⁷;
- in broad terms in addition to the purchase price of an asset the cost of an item of property plant and equipment includes the any cost directly attributable to bringing the asset to the location and condition necessary for it to be operated in the manner intended by management⁸

For this purpose, directly attributable costs include (among other costs):

- costs of employees arising directly from the construction or acquisition of the item of property, plant and equipment;
- installation and assembly costs; and
- costs of testing whether the asset is functioning properly⁹

Administration and other general overheads that are not directly attributable to bringing the asset to the location and condition necessary for it to be operated in the intended manner are generally excluded from capitalisation¹⁰. However, overheads specific to asset construction, implementation and testing may meet this criterion; and

- additional criteria provided by Accounting Standard AASB 138 “Intangible Assets” apply to expenditure incurred in connection with the production of software. In summary, for such cost to be capitalised:
 - the expenditure must be capable of being reliably measured;
 - the completion of the software to make it available for use, must be intended, technically feasible and adequately resourced; and
 - the software must be capable of being used and of generating economic benefits.

⁷ Australian Accounting Standard Board; Glossary of defined terms, May 2011, p 3.

⁸ Australian Accounting Standard AASB 116, Property Plant and Equipment, para16

⁹Ibid, para 17

¹⁰ Ibid para 19

5.1.2 Findings

Attribution of internal labour expenditure between Multinet and UED

Our examination of spreadsheet “C1.FTE Budget Amended” of the Internal Labour Cost Model disclosed the following attributes and allocations of internal labour between UED and Multinet.

- 31 positions directly attributed to Multinet. These are summarised at Appendix D. Appendix D demonstrates that these positions all relate to the management of gas assets, gas metering or gas product development. On this basis, these positions have been directly attributed to Multinet.
- 63 positions directly attributed to UED, principally resident in cost centres 1440, 1400, 1410, 1420, and 1430. These are summarised at Appendix E. Appendix E demonstrates that many but not all of the position descriptions are on the face of it associated with the electricity network operations.

In addition, “positions in the CEO Office – cost centre 1000 (Wave 3 contingency and pay roll uplift) have been fully attributed to UED. Multinet confirmed to us that this treatment is intentional.

We found that one position “Network Accountant – Multinet Gas” had been directly attributed to UED, rather than Multinet. We brought this to Multinet’s attention. However, the consequential misstatement of Multinet’s forecast cost would seem unlikely to be material and is offset by a similar difference explained below.

- 151 positions shared between Multinet and UED throughout the five year period. These are summarised at Appendix F. Appendix F demonstrates that:
 - senior and general management positions (and their dedicated staff such as EAs) such as the CEO, CFO, CIO and General Managers, have been allocated 75% to UED and 25% to Multinet. This apportionment of effort and hence cost, reflects Multinet/UED’s estimate of the relative complexity of the electricity and gas businesses, and management action driven by the higher public profile of the electricity business; and
 - IT positions other than the CIO are allocated on the basis of 62% of effort being applied to UED and 38% to Multinet. Multinet has indicated that these bases of allocation were approved by the Multinet and UED Boards in April 2011;
 - HR, organisational development, administration and transactional based positions such as accounts payable and credit control are based on the weighted average of all other staff, on the basis that staff numbers are the driver of time and cost for these employees. We comment that this appears reasonable given that there are separate procurement and contracts management positions which are allocated on the basis of relative asset values. Expenditure of an overhead nature, that accounts payable would need to address, is generally driven by staff numbers since staff cause or give rise to, overheads. We note that this allocator changed from 85.6%:14.4% (UED:Multinet) prior to 30 June 2013, to 63.7%:34.3% post 30 June 2013. This is consistent with Multinet’s revised business model that involves bringing many functions in house. (However, please note that our scope of work did not extend to checking the calculations of these or other allocators);
 - remaining corporate management positions, such as treasury, finance, risk management and co secretarial, which are neither strategic nor transactional or head count driven, are

allocated on the basis that effort is driven by the relative size of the regulatory asset bases of UED and Multinet and judgements of the relative complexity of the two businesses. This has resulted in a 65%:35% UED:Multinet allocation representing the mid point estimates in the range 60%:40% and 70%:30%. Again, this seems to be a reasonable basis of allocation since the management of capital, risk regulated revenue and closely associated issues, is generally caused by, or closely associated with, the regulatory asset base; and

- there are a 41 network control (NCC) positions that have been allocated on a 70%:30% basis and a further 12 that have been allocated on a 60%:40% basis. Multinet informed us that this reflects management judgment of the relative effort associated with these positions. While we have seen no support for these judgements, we note that this range of allocations is consistent with the range from which a mid point has been drawn for other allocations of effort related to relative network value outlined above. On this basis, the bases of allocations for these NCC positions appear reasonable.
- 27 positions directly attributed to UED prior to 1 July 2013, the date of termination of the Jemena OSA, but shared between Multinet and UED after that date. These are summarised at Appendix G. Appendix G demonstrates that these principally comprise functions that are currently outsourced to Jemena under the OSA, but will no longer be outsourced under the new arrangements after June 2013. Under its similar outsourcing arrangements, UED conducts these roles in house, and the forecasts assume that post June 2013 the resources currently directly attributed to UED will be shared between UED and Multinet. We did find an apparent anomaly which we brought to Multinet's attention. A Bush Fire Mitigation Officer is assumed to be shared between UED and Multinet post June 2013. It does not seem likely that the gas network would require this position. We have brought this to Multinet's attention, but note that any misallocation of costs is unlikely to be material and offset by an apparent misallocation of the costs of a network accountant for Multinet, described above.
- 1 position directly attributed to Multinet prior to 1 July 2013, the date of termination of the Jemena OSA, but shared between UED and Multinet after that date. This is summarised at Appendix H. On the face of it, this one position "Multinet Commercial/Contracts Manager" should be directly attributable to Multinet after 30 June 2013. However, Multinet explained that this position is currently focused on putting in place the new outsourcing arrangements. Once those arrangements are in place on 1 July 2013, a reasonable long term assumption would be that this position would devote time to both Multinet and UED contracts in broad proportion to the asset values of each network. We note that this allocation assumption is consistent with the post June 2013 allocation assumptions for other contract management personnel in the same cost centre (1100) as the "Multinet Commercial/Contracts Manager".

The results of the analysis summarised above support findings that Multinet has:

- directly attributed internal labour costs where it appears reasonable to do so, to Multinet or to UED; and
- has allocated shared internal labour costs between UED and Multinet on the basis of employee time estimated on the basis of the causal triggers or close approximations thereto, of the application of that time to Multinet and UED. Employee time provides in turn, a causal allocator because for a given employee, time spent working is a trigger of the utilisation of the labour costs for that employee.

On these bases we conclude that Multinet has attributed or allocated internal labour costs between itself and UED using bases of allocation that are consistent with well established regulatory principles and precedents that have been determined or approved by the AER, and hence meet the requirements of NGR rule 93.

Attribution of expenditure between operating and capital expenditure

Appendix I demonstrates that for 34 Multinet internal labour positions, costs have been forecast to be capitalised in whole or in part. These costs comprise IT and Operations costs. Because the costs are forecast it is not possible to demonstrate by reference to historical records or events, whether they meet the criteria for capitalisation set out in Section 5.1.1 above. Rather it is necessary to examine whether the assumptions on which the capitalisation is forecast, are consistent with these criteria.

Our discussions with Multinet indicated that the positions and proportions of cost, capitalised were based on management judgements of whether the activities undertaken by these positions were expected to relate to managing or bringing into being, assets. However, these judgements are not documented or evidenced.

We comment that:

- Appendix I demonstrates that on the face of it, it is reasonable to assume that the positions specified could contribute in whole or in part to activities that would meet the capitalisation criteria set out at Section 5.1.1. For example, it appears reasonable that a capex manager's costs be capitalised;
- however, we are unable to substantiate the judgements made by Multinet in determining to capitalise certain internal labour costs; and
- therefore, we recommend that Multinet review the criteria we have summarised at Section 5.1.1 to satisfy itself that the assumptions it has made about capitalised internal labour costs are consistent with these criteria.

5.2 Jemena OSA expenditure

Multinet has forecast this expenditure on the basis of amounts payable under the existing OSA.

5.2.1 Procedures

We compared the amounts of OSA cost forecast for the 6 months to 30 June 2013, the termination date of the OSA, to Multinet's calculations of the OSA costs due for that period set out in the workbook "MGH OSA FEE_NK_DC" received 27 March 2012.

5.2.2 Findings

The total OSA cost in the Overall Cost model Summary Sheet, expressed in 2011 dollars, comprises:

	\$'000
Network	13,496
CMS	3,150
Other	<u>295</u>
	<u>16,941</u>

Cell G21 of the sheet "OSA Fee Profile" the workbook "MGH OSA FEE_NK_DC" indicates an estimated OSA fee for the 6 months to June 2013, exclusive of FRC and other costs, of \$18,935,000. This figure is expressed in nominal 2013 dollars. Discounting back to 2011 dollars using assumed annual CPI of 2.8% indicated in the assumptions sheet of the Overall Cost Model, provides a figure of \$17,918,000. This suggests that the forecast OSA could be understated by almost \$1m in total. This is a non-recurring amount, that arises only in 2013 and accounts for 0.3% of the total operating expenditure forecast for the 5 year period.

5.3 Other internal costs

These comprise:

- other staff costs;
- variable overhead costs;
- fixed overhead costs; and
- other network services costs

totalling \$49.268m over the access arrangement period.

5.3.1 Procedures

We identified the sources of data for these costs in Multinet forecasting models and repeated a reconciliation that had been conducted by Multinet, to test the reasonableness of these forecasts.

5.3.2 Findings

In the Overall Cost Model, these costs are:

	2013 \$'000	2014 \$'000	2015 \$'000	2016 \$'000	2017 \$'000
Other staff costs	578	689	719	719	719
Variable O/H costs	955	1,555	1,812	1,812	1,812
Fixed O/H costs	5,907	5,878	5,878	5,878	5,878
Other network services	942	1,885	1,885	1,885	1,885
	<u>8,379</u>	<u>10,007</u>	<u>10,294</u>	<u>10,294</u>	<u>10,294</u>

Other staff costs and variable overheads are assumed to increase with increasing staff numbers with significant changes at:

- 1 July 2013 due to the revised outsourcing arrangements coming into effect in July 2013; and
- 1 July 2014 due to the assumption of a new office building with increased rent.

The forecast models include detailed analyses which fully allocate all overheads including property costs and insurance to the FTE in each functional group within Multinet.

Additionally, Multinet has reconciled these forecasts to the internal costs it would expect based on:

- estimates of direct costs (other than property related overheads and insurance) provided by each principal functional group within Multinet;
- an apportionment based on an FTE allocator, of property costs (excluding depot costs which are included in Operations), between UED and Multinet. We note that majority of property costs used in reconciliation are supported by detailed assumptions; and
- estimates of specific network services costs payable to third parties.

We rework that reconciliation below.

	2013 \$'000	2014 \$'000	2015 \$'000	2016 \$'000	2017 \$'000
Network services (see Note 1 below)	942	1,885	1,885	1,885	1,885
Property costs (see Note 2 below)	827	1,302	1,358	1,358	1,358
Estimates by functional					
Network	2,000	2,000	2,000	2,000	2,000
CMS	700	700	700	700	700
IT	961	961	961	961	961
Legal	500	500	500	700	700
Regulatory	250	250	250	250	250
Finance (inc insurance)	1,381	2,062	2,349	2,149	2,149
Other	<u>500</u>	<u>500</u>	<u>500</u>	<u>500</u>	<u>500</u>
Total	8,061	10,160	10,503	10,503	10,503
Per forecasts (above)	<u>8,379</u>	<u>10,007</u>	<u>10,294</u>	<u>10,294</u>	<u>10,294</u>
Difference (Total \$462,000)	<u>(318)</u>	<u>153</u>	<u>209</u>	<u>209</u>	<u>209</u>

Notes:

- 1 These figures are based on costs invoiced to Jemena for Multinet that Multinet has assumed will not be covered in the tendered services post June 2013. The 2013 figures represent six months' costs on the basis that the first six months will be encompassed in the Jemena OSA.
- 2 Property costs exclude fit out expenditure which we have assumed, is being treated as capital expenditure.

The reconciliation difference arises because of the allocation of property costs. Multinet stated that it has used EFT to provide an allocator of 34%:66% between Multinet and UED, based on EFT assumptions of 92 for Multinet and 178 for UED. We comment that this is a reasonable casual allocator for these costs because the requirement for office space and hence cost, is driven by the numbers of people that need to be accommodated. Section 5.1.2 above indicates that the EFT allocation between Multinet and UED is 34%:66% after 30 June 2013 and 14%:86% before that date. We have used these allocators in the above table. However, we note that Multinet's reconciliation calculation appears to have applied a 33% allocation of 2013 property costs to all years. The difference is set out below

	2013 \$'000	2014 \$'000	2015 \$'000	2016 \$'000	2017 \$'000
Total UED/Multinet property costs	<u>3,446</u>	<u>3,828</u>	<u>3,994</u>	<u>3,994</u>	<u>3,994</u>
KPMG calculation of Multinet allocation (24% in 2013 then 34%)	827	1,302	1,358	1,358	1,358
Multinet calculation of Multinet allocation (33% of 2013 property cost)	<u>1,148</u>	<u>1,148</u>	<u>1,148</u>	<u>1,148</u>	<u>1,148</u>
Difference (Also see table above)	<u>(321)</u>	<u>154</u>	<u>210</u>	<u>210</u>	<u>210</u>

We conclude that forecast other internal costs could be understated by \$466,000 over the 5 year period

5.4 Tender costs

These costs have been extracted from the models which record quantities and prices by preferred tenderers.

5.4.1 Procedures

We:

- agreed the expenditure forecast in the Overall Cost Model to the outputs from the tender models; and
- for Customer and Market Services only, provided commentary on how the meter reading volume assumptions in the tender models compare to historic data.

5.4.2 Findings

The forecasts of outsourced operating expenditure in the Overall Cost Model Summary agreed to the TCE tender templates completed by Jemena for the Northern Region and Comdain for the Southern Region;

We compared the following volume fields in the models to 2010 historic data provided to us by Multinet:

Meter reading

Service	Monthly charge volumes		
	2008 Actual mean	Estimate in model ¹¹	% Variation of estimate from actual mean
Bi-Monthly Scheduled Reads	315,659	316,667	0.3%
Monthly Scheduled Reads	166	208	25.3%
Special Reading	11,672	10,833	(7.2%)
Disconnections	484	1,083	123.8%
Special Investigations	26	33	26.9%
Additional Fee for Appointments	10	200	2,000%

We comment that:

- the great majority of forecast cost is associated with the bi-monthly meter reads where the volume estimates in the model align closely with the actual data; and
- while other volume data fields have greater percentage variances the amounts of cost they account for are significantly less. We estimate that if the 2008 actual volumes were substituted for the estimates in the model the impact on the cost forecast would be to reduce it by about \$23,000 pa (about 0.9%) for the 4.5 years to June 2017. This difference does not appear to be material.

5.5 EPG costs

The EPG fee represents a fee for management services necessary to sustain and manage Multinet efficiently. The nature of the fee was examined in depth by the KPMG report “Examination of an annual fee for service payable to Energy Partnership (Gas) Pty Ltd”, October 2007.

5.5.1 Procedures

We sighted:

- a letter dated 17 May 2011 from the DUET Group to David Strang, CFO of Multinet that describes costs of \$4.534m allocated to Multinet by DUET, AMPCI and Macquarie for the 2010 calendar year; and
- a draft letter (dated 19 September 2011) addressed to Andrew Schille, UED/Multinet Regulatory Manager, from Hester Brown, Partner Ernst & Young, whose stated purpose is to update “on the results of our audit” on the “specified costs arising in the provision of services by DUET, AMPCI and PIES to Multinet Gas Distribution Partnership”.

¹¹ Overall Cost model – Work Sheet B.8 CMS Meter Reading – Cells L25:L28 and L40:L41

5.5.2 Findings

The Ernst & Young letter sets out the results of its tests of the \$4.534m of costs of allocated to Multinet, set out in the DUET letter of 17 May 2011. The Ernst & Young letter stated that:

- the share of DUET costs relating to Multinet was calculated to be \$1.340m in accordance with the letter of 17 May 2011;
- the percentage allocation to DUET was assessed for reasonableness and consistency with the methodology employed in previous years;
- the actual costs relating to DUET arising in the REs were \$0.819m;
- the costs were verified to the ledger of DUET and the REs respectively;
- Ernst & Young performed testing of Macquarie bonuses of \$0.694m and AMP bonuses of \$0.938m not included in the DUET and RE costs; and
- accordingly, Ernst & Young has performed audit testing over a total of \$3.791m of costs for 2010 calendar year and is in a position to sign off an audit report on these items.

In compiling its operating expenditure forecasts, Multinet has:

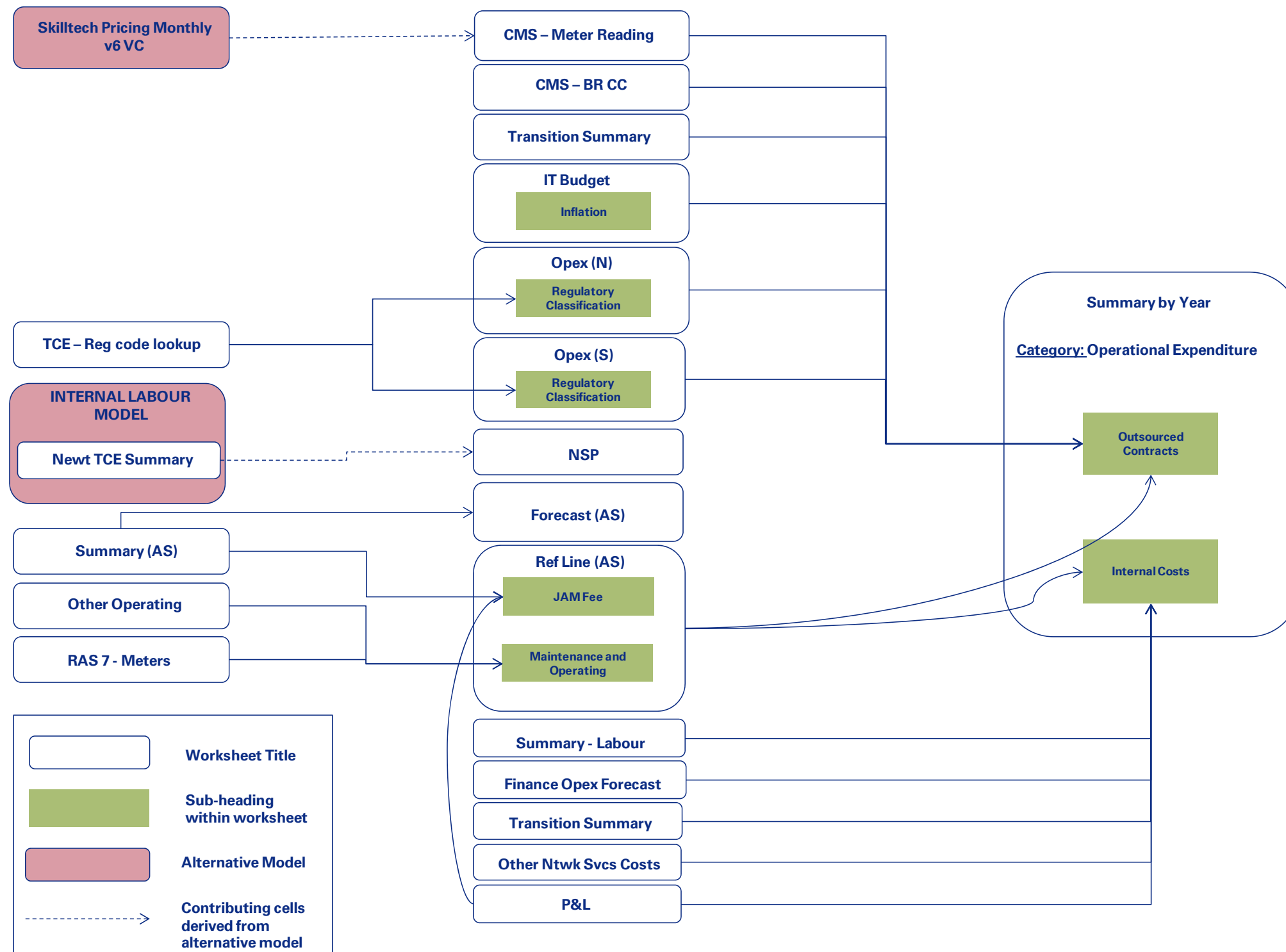
- taken the lower, independently verified figure of \$3.791m and escalated it from 2010 dollars to \$3.940m in 2011 dollars to be consistent with the basis of its cost forecasts; and
- assumed that these costs will not change in real terms across the five years.

A Appendix A: Workbook Flowcharts

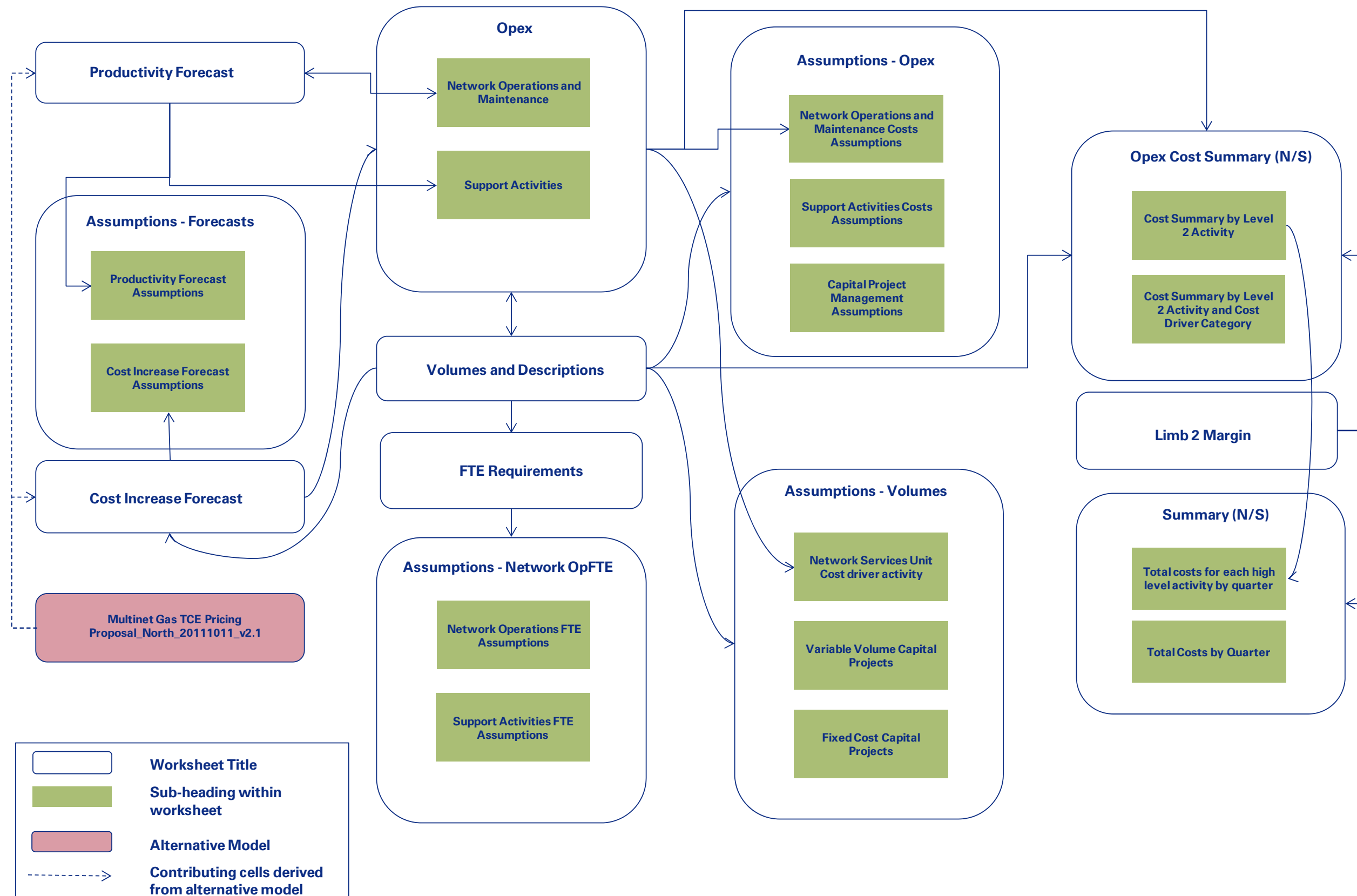
The main purpose of the flowcharts below is to illustrate how the different workbooks components work together and where links to other workbooks occur.

All components displayed in the flowcharts were included in the general procedures as outlined in chapter 3.4.2. Worksheets, which were dedicated to Capex calculations only, were excluded and therefore do not form part of the flowcharts. Moreover, where appropriate, worksheet-specific tests were carried out as described in chapters 3.4.3, 3.4.4 and 3.4.5.

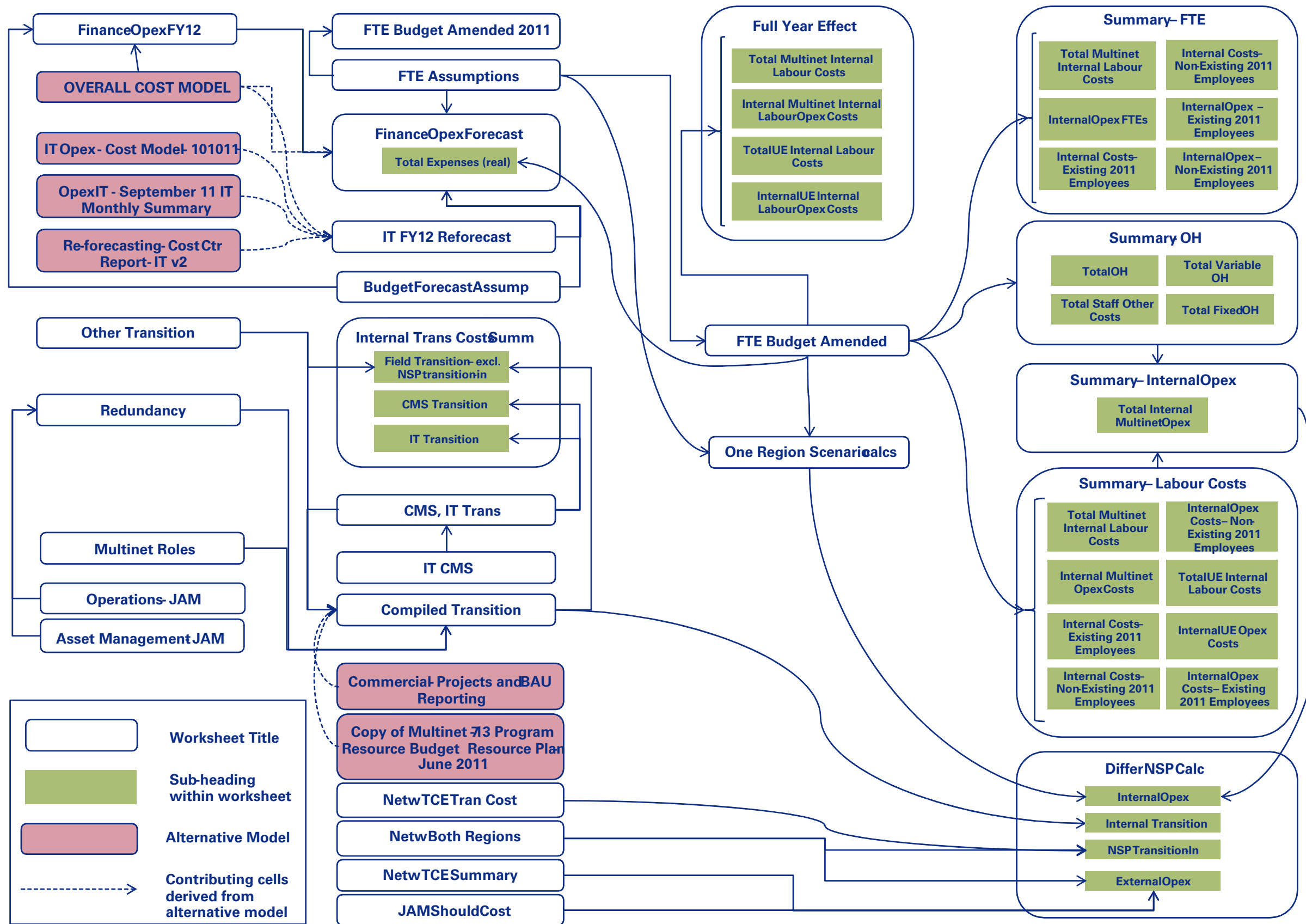
Overall Cost Model



Supplier Pricing Jemena/Comdain (simplified)



Internal Labour Cost Model



B Appendix B: Complete List of Findings, Responses and Remedial Actions

The table below is sorted first by workbook name and then by the name of the respective worksheet:

KPMG comments					Sent to UEM on...	UEM response/comments			KPMG follow-up	
Issue #	Workbook	Worksheet	Cell reference	Observation		Checked	Amended	Comments	Sign-off	Comments
GW08	1 Overall Cost Model	A1. Summary - Labour	E13:S13 E22:S22 (...)	The values for 'Finance labour costs' do not appear to be consistent with worksheet "B1. Summary - Labour Costs" within Model "4 Internal Labour Costs". Could you please advise the reason for this discrepancy and/or provide supporting evidence?	13-Mar-12	✓	✓	Corrected. Additional supporting documentation provided to explain how the values were calculated.	✓	Sufficient additional supporting documentation was provided. The revised Internal Labour Cost Model now contains data in tab "B1. Summary Labour Cost", which matches the corresponding data in the Overall cost model.
GW05	1 Overall Cost Model	A2. Finance Opex Forecast	AD239:CK239	Subtotals do not equate to the sum of parts. This is presumably due to manual adjustments without updating the respective totals accordingly. Can you please provide a rationale and/or supporting evidence for these inconsistencies? Please also correct the totals in the revised version.	09-Mar-12	✓	✓	Corrected. Manual adjustment relates to rental. Please refer to additional supporting documentation.	✓	Issue corrected in revised workbook. Sufficient additional supporting documentation was provided.
GW06	1 Overall Cost Model	A2. Finance Opex Forecast	Row 199 (Salaries) Row 387 (Other Staff Costs)	"Salaries" in row 199 are omitted from "other staff costs" (row 387), despite being included in the group of people costs via the colour legend (i.e. in orange group). Could you please confirm that this is correct or revise?	09-Mar-12	✓	×	Confirmed that this is correct. Salary costs are calculated in the Internal Labour Cost Model. "Other staff cost" exclude salaries by definition.	✓	Sufficient clarification provided.
GW07	1 Overall Cost Model	A2. Finance Opex Forecast	AD243:CK243	The previous cells in this row 243 are the subtotals of variable, fixed, and other staff costs (in rows 385-387). This pattern is broken at this range of cells, as the three costs do not sum to the "other internal costs" figure. Please advise.	09-Mar-12	✓	✓	Corrected. Manual adjustment relates to rental. Please refer to additional supporting documentation.	✓	Issue corrected in revised workbook. Sufficient additional supporting documentation was provided.
GW02	1 Overall Cost Model	A5. IT Budget	F53:S53	Subtotals do not equate to the sum of parts	07-Mar-12	✓	×	These calculations do not flow through to other parts of the model and hence do not influence the overall financial results.	✓	Issue does not influence the calculation of Multinet's Opex cost for the next regulatory period.



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KPMG comments					Sent to UEM on...	UEM response/comments			KPMG follow-up	
Issue #	Workbook	Worksheet	Cell reference	Observation		Checked	Amended	Comments	Sign-off	Comments
GW10	1 Overall Cost Model	B1. Opex (N/S)	F4 D5	This worksheet has "Comdain" in its header but is also titled as North, which is supposed to be covered by Jemena rather than Comdain. Could you please explain?	13-Mar-12	✓	✓	Corrected by changing names.	✓	Issue corrected in revised workbook.
GW09	1 Overall Cost Model	B2. Opex	All	It appears that this worksheet should contain the same data as the worksheet "Opex" within Model "3 Supplier Pricing Comdain". However, only the first column appears to be identical. Could you please explain?	13-Mar-12	✓	×	The difference is due to other escalators.	✓	The difference can be explained by other escalators as outlined in tab "10. Cost Increase Forecast" within the Supplier Pricing Comdain workbook.
RH04	1 Overall Cost Model	B4. Transition Summary	Row 14	The data in this row does not appear to flow through to the 'Summary By Year' worksheet. Could you please explain?	13-Mar-12	✓	×	It is added to the network operations transition costs	✓	It appears that the values in question were copied over into the 'summary by year' worksheet as hard-coded values. The correct values were copied into rows 195 and 209.
RH01	1 Overall Cost Model	B8. CMS - Meter Reading	AI25:AI28	Formula appears inconsistent. Why is the last part of the formula not divided by 2 as in columns AG and AH? Please check and advise.	09-Mar-12	✓	×	Confirmed that this is an error. However, the overall impact of this error is less than \$35,000 and therefore immaterial.	✓	Noted that this issue is considered immaterial with regards to Multinet's overall Opex cost for the next regulatory period.
GW04	1 Overall Cost Model	B9. CMS	M169	This formula appears to be inconsistent with the logic behind cell M165. Can you please provide an explanation and/or correct?	09-Mar-12	✓	×	ATK's calculation . It seems like the logic similar for both cells referred.	✓	After additional discussion, it was agreed that the formula in question is indeed correct relative to its intended purpose.
GW03	1 Overall Cost Model	NSP	AQ78:AT78 AQ91:AT91 AQ98:AT98 AQ138:AT138 AQ145:AT145	Subtotals do not equate to the sum of parts. The same error was noted in other parts of this spreadsheet as well. It would facilitate error checking if formulas were provided rather than hard-coded values. Please advise.	09-Mar-12	✓	×	This sheet is not used for any calculation. ATK's historical data.	✓	Issue does not influence the calculation of Multinet's Opex cost for the next regulatory period.
GW01	1 Overall Cost Model	Summary by Year	J18	Omitted J23 (Other service costs) from subtotal	07-Mar-12	✓	✓	Changes will be made to the revised version.	✓	Issue corrected in revised workbook.
JW01	1 Overall Cost Model	Summary by Year	O49:I49	Other CMS costs of \$357 ('000) are hard-coded. Could you please confirm that this value is indeed correct?	09-Mar-12	✓	×	Yes. Its agreed adjustments. Please refer to additional documentation.	✓	Sufficient additional supporting documentation was provided.
JW02	1 Overall Cost Model	Summary by Year	O62	The IT break fees for CY 2013 of \$1,304 ('000) are hard-coded. Could you please confirm that this value is indeed correct?	09-Mar-12	✓	✓	Yes, it is correct for the version audited. However, it is removed now as it does not belong to GAAR period.	✓	Sufficient additional supporting documentation was provided.
JW03	1 Overall Cost Model	Summary by Year	E22:I22 L22:S22	The EPG fee of \$3,940 ('000) is hard-coded. Can you please confirm that this value is indeed correct?	09-Mar-12	✓	×	Yes. Its agreed adjustments. Please refer to additional documentation.	✓	Sufficient additional supporting documentation was provided.

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KPMG comments					Sent to UEM on...	UEM response/comments			KPMG follow-up	
Issue #	Workbook	Worksheet	Cell reference	Observation		Checked	Amended	Comments	Sign-off	Comments
JW04	1 Overall Cost Model	Summary by Year	V57:W59 V150:W152 V159	Is it correct that these lamps are set to yellow? Could you please provide a reason?	09-Mar-12	✓	✓	Lamp colour changed to green.	✓	Lamp colour changed to green.
RH02	1 Overall Cost Model	Summary by Year	E24:S24 E50:S50 E51:F51 E60:S60	Inputs are divided by 1,000. Is this correct given that the source data already has the same units as defined in the column heading? Please advise or correct.	13-Mar-12	✓	✓	Corrected by removing the unit heading.	✓	Issue corrected in revised workbook.
RH03	1 Overall Cost Model	Summary by Year	T70:T72	This appears to be the only link to the 3 scenarios model. Can you please explain how this is relevant and/or supply supporting evidence?	13-Mar-12	✓	✓	Removed cell contents as they were not material to the overall model output.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
LJ01	2 Supplier Pricing Jemena	2. Summary (N)	G45 :AB45 G48:AB48 G51:AB51	The calculations for the Limb 2 costs do not appear to be referenced to the correct input cells. The limb 2 margin should be applied to the respective Limb 1 costs, not always to the Limb 1 costs in row 41. The error appears to have occurred because HLOOKUP function was copied down with an absolute reference to cell G\$41.	07-Mar-12	✓	✓	Changes will be made to the revised version.	✓	Issue corrected in revised workbook.
SG02	2 Supplier Pricing Jemena	6. Opex	Rows 1117, 1121, 1125, 1129, 1137, 1141, 1145, 1149, 1153, 1157, 1161	Is it correct that there are not totals calculated within these rows? This appears inconsistent with the rest of this spreadsheet. Please advise.	13-Mar-12	✓	✓	ATK model build logic. These numbers are summarised from 3. Opex Cost Summary (N) to the summary sheet.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
LJ02	2 Supplier Pricing Jemena	6. Opex	L135, M135, N135	The value in these cells should be 12.03, not 22.41. This is likely to have an impact on the remaining cells in row 135. Moreover, L135 contains a hard-coded value. Can you please check and revise where necessary?	14-Mar-12	✓	✓	Corrected.	✓	Issue corrected in revised workbook.
JW06	3 Supplier Pricing Comdain	2. Summary (S)	G45 :AB45 G48:AB48 G51:AB51	The calculations for the Limb 2 costs do not appear to be referenced to the correct input cells. The limb 2 margin should be applied to the respective Limb 1 costs, not always to the Limb 1 costs in row 41. The error appears to have occurred because HLOOKUP function was copied down with an absolute reference to cell G\$41.	13-Mar-12	✓	✓	This sheet is not used as an input sheet. However, this issue is corrected in the revised version.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
SG01	3 Supplier	6. Opex	Rows 1117,	Is it correct that there are not totals calculated	13-	✓	✓	ATK model build logic. These	✓	Issue does not impact the calculation

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KPMG comments					Sent to UEM on...	UEM response/comments			KPMG follow-up	
Issue #	Workbook	Worksheet	Cell reference	Observation		Checked	Amended	Comments	Sign-off	Comments
	Pricing Comdain		1121, 1125, 1129, 1137, 1141, 1145, 1149, 1153, 1157, 1161	within these rows? This appears inconsistent with the rest of this spreadsheet. Please advise.	Mar-12			numbers are summarised from 3. Opex Cost Summary (N) to the summary sheet.		of Multinet's Opex cost for the next regulatory period.
JW07	3 Supplier Pricing Comdain	8. Volumes and Descriptions	E.g. rows 21, 22 and 23	Different rows appear to be coloured in different ways (e.g. light purple, dark purple, green). Is this due to manual adjustments made to the data? Could you please explain?	14-Mar-12	✓	✗	It is supplier's data input. No changes made.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY03	4 Internal Labour Cost	B.4 Summary - Internal Opex	I28	Cell is empty. Is an overall average required here?	09-Mar-12	✓	✓	Corrected.	✓	Issue corrected in revised workbook.
RY01	4 Internal Labour Cost	B1. Summary - Labour Costs	K24	The purpose of this cell does not appear to be clear. Moreover, the formula contains a link to file saved on a local hard-drive. Please advise.	09-Mar-12	✓	✗	It's a working. Please ignore.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY02	4 Internal Labour Cost	B1. Summary - Labour Costs	K51	The purpose of this cell does not appear to be clear. Moreover, the formula contains a link to file saved on a local hard-drive. Please advise.	09-Mar-12	✓	✗	It's a working. Please ignore.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY04	4 Internal Labour Cost	B3. Summary - OH	Columns E to J and V to Y	Could you please confirm that it is correct that all four data blocks contain the same values?	09-Mar-12	✓	✓	A difference occurs due to the use of CY vs. FY. For 2013 GAAR period only 6 months numbers would be applicable. Moreover, columns E to J as well as V to Y contain FTE numbers, which explains why the cell values repeat themselves from block to block.	✓	After additional discussion, it was agreed that the cell blocks in question indeed contain correct formulas relative to their intended purpose.
KL01	4 Internal Labour Cost	C1. FTE Budget Amended	Rows 41, 48, 77, 85, 140-192, 194-200, 202-203, 210-211, 220-246	For a number of positions with a start date of 1 July 2013 costs are still split between UED and MGDP even though the new outsourcing arrangement will be in effect from that day onwards. Can you please check this and/or revise?	09-Mar-12	✓	✗	ATK has used % split without checking the start date. This will not affect any numbers due to the set-up of the formulas.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period. Moreover, additional evidence of previous signoff by ATK was provided.
RY35	4 Internal Labour Cost Model	B3. Summary - OH	C19:I48	Please confirm that these values should all equal the cell block C8:I15	14-Mar-12	✓	✗	ATK working. This issue has no impact on the calculation of Opex costs for the next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY36	4 Internal Labour Cost Model	B3. Summary - OH	U19:Y48	Please confirm that these values should all equal the cell block U8:Y15	14-Mar-12	✓	✓	Yes. GAAR Period numbers	✓	After additional discussion, it was agreed that the formula in question is indeed correct relative to its intended

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KPMG comments					Sent to UEM on...	UEM response/comments			KPMG follow-up	
Issue #	Workbook	Worksheet	Cell reference	Observation		Checked	Amended	Comments	Sign-off	Comments
										purpose.
RY37	4 Internal Labour Cost Model	B4. Summary - Internal Opex	D7:H7	Could you please provide a reason why these values are hard-coded unlike other cells in this worksheet, which contain formulas?	14-Mar-12	✓	×	Values are confirmed as correct. This issue has no impact on the calculation of Opex costs for the next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY19	4 Internal Labour Cost Model	C1b. FTE Budget Amended 2011	W84:W86	Missing values. Total does not equal 100%	14-Mar-12	✓	×	ATK's working. No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY05	4 Internal Labour Cost Model	C2. Finance Opex Forecast	Rows 108, 152, 196 , 340, 384	Sum formulas missing. Hard-coded sums do not always reflect the correct sum of values above. Please revise by adding correct sum formulas to ensure consistency with the rest of this worksheet.	13-Mar-12	✓	×	ATK's working rows. No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY06	4 Internal Labour Cost Model	C2. Finance Opex Forecast	E111, E155, E255, E299, E343	Are these headings correct? If so, could you please explain why there are capex sections in the opex sheet?	13-Mar-12	✓	×	ATK's working rows. No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RH05	4 Internal Labour Cost Model	C2. Finance Opex Forecast	BT239 and BT249	Subtotals should be the same for the different dissection methods - note the difference is identified but not resolved in BT 250. Differences noted for the remaining columns to the right	14-Mar-12	✓	×	This issue has no impact on the calculation of Opex costs for the next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RH06	4 Internal Labour Cost Model	C2. Finance Opex Forecast	BN114 to BN151	Should be inflating the previous year's value, but it is instead using the year value instead of a percentage inflator - no financial impact because the values are set to zero in the version we observed	14-Mar-12	✓	×	ATK working. This issue has no impact on the calculation of Opex costs for the next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RH07	4 Internal Labour Cost Model	C2. Finance Opex Forecast	F393 to BM393 and F349 to BM349	Sum of rows above are fixed values and do not respond to changes in values above the total row. (Does not add)	14-Mar-12	✓	×	This issue has no impact on the calculation of Opex costs for the next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY08	4 Internal Labour Cost Model	C3. Finance Opex FY12	Rows 108, 152, 196 , 349, 393	Sum formulas missing. Hard-coded sums do not always reflect the correct sum of values above. Please revise by adding correct sum formulas to ensure consistency with the rest of this worksheet.	13-Mar-12	✓	×	ATK's working rows. No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY07	4 Internal Labour Cost Model	C3. Finance Opex FY12	D111, D155, D308, D352	Are these headings correct? If so, could you please explain why there are capex sections in the opex sheet?	13-Mar-12	✓	×	ATK's working rows. No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RH08	4 Internal	C3. Finance Opex	Q200 and	Column Q seems to be deflated by a half year	14-	✓	×	Confirmed as correct.	✓	After additional discussion, it was

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KPMG comments					Sent to UEM on...	UEM response/comments			KPMG follow-up	
Issue #	Workbook	Worksheet	Cell reference	Observation		Checked	Amended	Comments	Sign-off	Comments
	Labour Cost Model	FY12	R200	for 2012 and yet column R seems to be deflated for a full year	Mar-12					agreed that the formula in question is indeed correct relative to its intended purpose.
RY09	4 Internal Labour Cost Model	D1. Internal Trans Costs Summ	H51, H68	Subtotal is missing, which means inconsistency with the rest of this worksheet and that this cost category is excluded from the overall total. Please confirm that this is correct and/or revise.	13-Mar-12	✓	✓	Corrected.	✓	Issue corrected in revised workbook.
RY10	4 Internal Labour Cost Model	D2. Compiled Transition	G16, G25	The formulas do not equal the sum of the items above. Please advise and/or revise.	13-Mar-12	✓	×	No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY11	4 Internal Labour Cost Model	D2. Compiled Transition	E16, E25, E32, E52, E58	The heading for this column is FY12-18. However, the formula is only set to sum up FY12, 13 and 14. Please revise.	13-Mar-12	✓	×	Heading covers the GAAR period	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY12	4 Internal Labour Cost Model	D2. Compiled Transition	D55	No formula in this cell, which appears inconsistent with the rest of this worksheet. Please advise.	13-Mar-12	✓	×	Corrected.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
JW05	4 Internal Labour Cost Model	D2. Compiled Transition	Columns F and G	A number of subtotals in these columns appear to have been subject to hard-coded manual adjustments. Please provide rationale for this and/or revise.	13-Mar-12	✓	×	ATK's working. No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY13	4 Internal Labour Cost Model	D2. Compiled Transition	H57	Formula appears inconsistent with those in cells D57 and F57. Please advise and/or correct.	14-Mar-12	✓	×	ATK's working. No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY14	4 Internal Labour Cost Model	D2. Compiled Transition	D58:H58	Formulas appear inconsistent and sum up cells in different rows. Please advise and/or correct.	14-Mar-12	✓	×	ATK's working. No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY15	4 Internal Labour Cost Model	D2. Compiled Transition	Column T	Can you please check the formulas in this column? The number formatting is inconsistent with the rest of the spreadsheet. Moreover, cell T16 does not contain a formula. Please advise and/or revise.	14-Mar-12	✓	×	ATK's working. No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY16	4 Internal Labour Cost Model	D2. Compiled Transition	BA58:BI58	Missing formula. Please revise.	14-Mar-12	✓	×	No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY17	4 Internal Labour Cost Model	D2. Compiled Transition	DH112:DU130	Unclear purpose of this cell block. Could you please advise whether it affects the overall output of the model?	14-Mar-12	✓	×	This is the main summary out of the workings from row 1 - 111.	✓	After further discussion, standard checks were applied to the cell ranges in question. No issues identified.
RY18	4 Internal	D2. Compiled	A61:DE130	Unclear purpose of this cell block. Could you	14-	✓	×	ATK working.	✓	After further discussion, standard

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KPMG comments					Sent to UEM on...	UEM response/comments			KPMG follow-up	
Issue #	Workbook	Worksheet	Cell reference	Observation		Checked	Amended	Comments	Sign-off	Comments
	Labour Cost Model	Transition		please advise whether it affects the overall output of the model?	Mar-12					checks were applied to the cell ranges in question. No issues identified.
GW11	4 Internal Labour Cost Model	D2. Compiled Transition	G15 and G16	Can you please double-check these formulas? It appears that these cells should equal E15 and E16 respectively, not F15 and F16.	14-Mar-12	✓	×	ATK working. This issue has no impact on the calculation of Opex costs for the next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
GW12	4 Internal Labour Cost Model	D2. Compiled Transition	F52:G52	These subtotals do not include rows 33 to 38. Please advise and/or correct.	14-Mar-12	✓	×	ATK working. This issue has no impact on the calculation of Opex costs for the next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY20	4 Internal Labour Cost Model	D4. Other Transition	N49	Please confirm that this formula is correct.	14-Mar-12	✓	×	Confirmed. Moreover, additional supporting documentation will be made available.	✓	Sufficient additional supporting documentation was provided.
RY21	4 Internal Labour Cost Model	D4. Other Transition	N51	Should super be included in this formula?	14-Mar-12	✓	×	ATK's working. No impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY22	4 Internal Labour Cost Model	D7. Operations-JAM	Columns I and J	Not all add to 100%. Is this correct?	14-Mar-12	✓	×	Yes. Moreover, this has no impact on the calculation of Opex costs for next regulatory submission.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY26	4 Internal Labour Cost Model	JAMShouldCost	C62:F62, M62, N62	Missing values. Please advise.	14-Mar-12	✓	×	ATK working. This issue has no impact on the calculation of Opex costs for next regulatory submission as actual numbers are available from Jemena.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY27	4 Internal Labour Cost Model	Netw TCE Summary	AQ44:AT44	Hard-coded value, which is not the sum of the cells above. Please revise with correct formula.	14-Mar-12	✓	✓	Corrected.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY28	4 Internal Labour Cost Model	Netw TCE Summary	AG51:AT51	Hard-coded value, which is not the sum of the cells above. Please revise with correct formula.	14-Mar-12	✓	✓	Corrected.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY29	4 Internal Labour Cost Model	Netw TCE Summary	AQ79:AT79	Hard-coded value, which is not the sum of the cells above. Please revise with correct formula.	14-Mar-12	✓	✓	Corrected.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY30	4 Internal Labour Cost Model	Netw TCE Summary	AQ92:AT92	Hard-coded value, which is not the sum of the cells above. Please revise with correct formula.	14-Mar-12	✓	✓	Corrected.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY31	4 Internal	Netw TCE	AG99:AT99	Hard-coded value, which is not the sum of the	14-	✓	✓	Corrected.	✓	Issue does not impact the calculation

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KPMG comments					Sent to UEM on...	UEM response/comments			KPMG follow-up	
Issue #	Workbook	Worksheet	Cell reference	Observation		Checked	Amended	Comments	Sign-off	Comments
	Labour Cost Model	Summary		cells above. Please revise with correct formula.	Mar-12					of Multinet's Opex cost for the next regulatory period.
RY32	4 Internal Labour Cost Model	Netw TCE Summary	AQ139:AT139	Hard-coded value, which is not the sum of the cells above. Please revise with correct formula.	14-Mar-12	✓	✓	Corrected.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY33	4 Internal Labour Cost Model	Netw TCE Summary	AG146:AT146	Hard-coded value, which is not the sum of the cells above. Please revise with correct formula.	14-Mar-12	✓	✓	Corrected.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.
RY34	4 Internal Labour Cost Model	Netw TCE Tran Cost	D5, D6, F5, F6	Values missing. Please revise.	14-Mar-12	✓	✓	Corrected.	✓	Issue does not impact the calculation of Multinet's Opex cost for the next regulatory period.

C Appendix C: Pro-forma business model – Cost catalogue

C.1 Labour positions

The following tables outline the expected positions which would need to be filled by a gas networks business. The total cost of these positions would include salaries as well as labour on-costs:

Board of Directors and Office of the Chief Executive	
Non-Executive Director(s)	Chief Executive Officer (CEO)
Executive Assistant to CEO	CEO Secretary / Administrative Assistant
Finance	
Chief Financial Officer (CFO)	External reporting/financial accounting manager
Financial risk manager	Internal reporting/cost accounting manager
Internal audit manager	Special projects manager
Tax manager	Business analytical support
Treasurer	Financial systems and IT manager
Investor relations manager	Procurement manager
Financial forecasting manager	Business development manager
Budgeting and planning manager	Secretary/Administrative Assistant
Human Resources (HR)	
HR planning and policies manager	Training manager
Recruitment manager	Employee information manager
Employee counselling manager	Secretary/Administrative Assistant
Information Communications Technology (ICT)	
Head of ICT	Helpdesk manager
ICT contracts manager	Secretary/Administrative Assistant
Company Secretary and Legal Services	
Company Secretary/General Counsel	Junior Lawyer (assistant to GC)
Senior Lawyer	Insurance & Compliance Officer
Lawyer - Commercial	Secretary/Administrative Assistant
Corporate affairs	
Communications Manager	Communications Coordinator
Corporate Affairs Manager	Secretary/Administrative Assistant

Office administration	
Facilities Manager	Receptionist
Administration Manager	Records Management Officer
Records Manager	Mail Room Officer
Mail Room Coordinator	Facilities Officer
Business strategy and market development	
General Manager Commercial	Manager Government Relations
Manager Business Strategy	Secretary/Administrative Assistant
Contracts management	
Contract negotiator	Disputes manager
Price negotiator	Supplier performance manager
Performance and quality manager	
Economic regulation	
Manager Economic Regulation	Regulatory Economist
Senior Regulatory Economist	Regulatory Analyst
Senior Regulatory Accountant	Secretary/Administrative Assistant
Regulatory Accountant	
Retailer and customer relations	
Manager Retail Relations	Customer Complaints Officers
Retail Relations Officers	Secretary/Administrative Assistant
Networks Management	
General Manager of Networks	Executive Assistant
Commercial Networks	
Commercial Networks Manager	Risk Management Coordinator
Network Development Marketing Manager	Contracts Management (Haulage)
Strategic Planning	
Business Improvement & Support	
Business Improvement & Support Manager	Regulatory Compliance Supervisor
Stores / Property Supervisor	Project Supervisor
Support Services Supervisor	

Networks Asset Strategy & Mains Replacement Program	
Network Asset Strategy & MR Program Manager	Control Centre Manager
Executive Assistant	Asset Manager
Asset Integrity, Systems and Planning Manager	Capital Planning Engineer
Technical Training and HSE	
Technical Training and HSE Manager	Technical Development and Regulation manager
Executive Assistant	Safety & Assurance Officer
Regulation Officer	Compliance Officer
Learning Management System Administrator	Regulation Officer
Network Operations	
Networks Operations Manager	Revenue Assurance Officer
Cathodic Protection	Network Maintenance Supervisor
Leakage and Survey Supervisor	Electronics & Instrumentation Coordinator
Field Maintenance Supervisor	
Capital Works	
Capital Works Manager	Project Engineer
Capital Works Supervisor	Connections Marketing Supervisor
Estimator	Project Manager
Planning & Engineering	
Planning & Engineering Manager	Executive Assistant
Engineering Services Manager	Engineering Policies and procedures
Major Projects Manager	Engineering Manager
Metering Services Supervisor	
Regional Operations	
Regional Operations Manager	Operations Manager South
Operations manager North	Technical officers

C.2 Other direct costs

Corporate costs	
Consultancy costs - CEO	External audit fees
Consultancy costs - Tax	ASIC company registry fees
Consultancy costs - Legal	ASX annual listing fees
Consultancy costs - HR	Conference fees
Consultancy costs - ICT	Professional memberships and subscriptions
Consultancy costs – Technical services	Staff training
Consultancy costs - Engineering	Postage and courier
Salary on-costs	Travel
Office accommodation	Telephone
Office overheads (lighting, heating, etc)	Stationery
Catering	Printing and copying
Network related costs	
Consultancy costs – Technical services	Vehicle fleet maintenance costs
Consultancy costs - Engineering	HSE audit fees
Vehicle fleet running costs	Technical compliance audit fees

D Appendix D: Internal labour positions directly attributable to Multinet

Function	UED "home" Business Unit	UED "home" Cost Centre	Position	Start Date	End Date	Pre-7/13 UED/MG Alloc			Post-7/13 UED/MG Alloc		
						Allocator	UED%	MGDP%	Allocator	UED%	MGDP%
Operations	CMS incl. NCC - EDPR	1440	Gas SME [Product Development Manager]	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	CMS incl. NCC - EDPR	1440	[Gas Metering Engineer] Resource 2	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	CMS incl. NCC - EDPR	1440	[Gas Metering Engineer] Resource 3	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Asset Manager - Gas	1-Jul-11		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Senior Metering Engineer	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Metering Engineer	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Senior Asset Integrity & Performance Analyst	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Asset Performance Engineer	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Senior Asset Performance Engineer	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Asset Performance Engineer	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Senior Engineer Network Planning	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Senior Engineer Network Planning	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Engineer Network Planning	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Multinet Asset Manager	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Technical Compliance Engineer	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Engineer (Graduate)	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Engineer (Graduate)	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Service Delivery Manager - North	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractors Performance Manager	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractors Performance Analyst	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractors Performance Engineer	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Service Delivery Admin Support	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Large Capex Manager (North & South)	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Project Performance Engineer (North & South)	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Capex Project Estimator (North & South)	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Service Delivery Manager - South	1-Jan-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractor Performance Manager	1-Jan-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractor Performance Analyst	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractor Performance Engineer	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Work Practices officer - Gas	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Procurement - Contract Administrator	1-Jul-13		0	0.0%	100.0%	-	0.0%	100.0%

E Appendix E: Internal labour positions directly attributable to UED

Function	UED "home" Business Unit	UED "home" Cost Centre	Position	Start Date	End Date	Pre-7/13 UED/MG Alloc			Post-7/13 UED/MG Alloc		
						Allocator	UED%	MGDP%	Allocator	UED%	MGDP%
CEO Office	CEO Office - EDPR	1000	Wave 3 (Contingency)	1-Apr-12		0	100.0%	0.0%	-	100.0%	0.0%
CEO Office	CEO Office - EDPR	1000	Wave 3 (Contingency)	1-Apr-12		0	100.0%	0.0%	-	100.0%	0.0%
CEO Office	CEO Office - EDPR	1000	Payroll Uplift - \$1.5m. Yr1 = \$500k	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Finance & Admin	Finance - EDPR	1200	Network Accountant (UE)	1-Feb-12		0	100.0%	0.0%	-	100.0%	0.0%
Finance & Admin	Finance - EDPR	1200	Network Accountant -(MG)	1-Jul-13		0	100.0%	0.0%	-	100.0%	0.0%
Operations	CMS incl. NCC - EDPR	1440	Elec SME [Customer Solutions & Product Development Manager]	1-Jul-13		0	100.0%	0.0%	-	100.0%	0.0%
Operations	CMS incl. NCC - EDPR	1440	Elec SME [Customer Solutions Analyst]	1-Jul-13		0	100.0%	0.0%	-	100.0%	0.0%
Operations	CMS incl. NCC - EDPR	1440	Elec SME [Industry Development Analyst]	1-Jul-13		0	100.0%	0.0%	-	100.0%	0.0%
Operations	CMS incl. NCC - EDPR	1440	Elec SME [Product Development Analyst]	1-Jul-13		0	100.0%	0.0%	-	100.0%	0.0%
Operations	CMS incl. NCC - EDPR	1440	[Elec Metering Engineer] Resource 4	1-Jul-13		0	100.0%	0.0%	-	100.0%	0.0%
Operations	CMS incl. NCC - EDPR	1440	[Elec Metering Engineer] Resource 5	1-Jul-13		0	100.0%	0.0%	-	100.0%	0.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Technical Training & Accreditations Officer	4-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Customer Policy Officer	18-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Network Compliance Officer	18-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Asset Development Manager - Combined with NIT Manager	1-Mar-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Network Procurement Strategy Manager	1-Jun-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Asset Performance Engineer	4-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Senior Asset Performance Engineer	14-Jun-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Principal Engineer Electricity Asset	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Principal Engineer Network Planning - CIC	16-May-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Principal Engineer Network Planning - Demand	16-May-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Asset Strategy & Performance Manager	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Network Planning Manager	16-May-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Engineer - Asset Performance	1-Oct-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Engineer - Demand	1-Jan-12		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	DMS/SCADA Analyst	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	DMS/SCADA Advisor	25-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Communications Engineer	14-Jun-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Protection Engineer	14-Jun-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Asset Information Manager	16-May-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Automation & Control Manager	16-May-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Asset Data Analyst	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	NIT Manager	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Protection Engineer (Graduate)	14-Jun-11		0	100.0%	0.0%	-	100.0%	0.0%

Function	UED "home" Business Unit	UED "home" Cost Centre	Position	Start Date	End Date	Pre-7/13 UED/MG Alloc			Post-7/13 UED/MG Alloc		
						Allocator	UED%	MGDP%	Allocator	UED%	MGDP%
Operations	Network Intel. & Devel. - EDPR	1410	Network procurement officer	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	DMS / SCADA Analyst	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Asset Performance Engineer	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Network Intel. & Devel. - EDPR	1410	Communication Planning Engineer	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Contract Performance Analyst	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Contract Performance Engineer	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Service Delivery Mgr	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Contractor Performance Manager	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Opex Maintenance Planner	1-Aug-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Capex Planner	16-May-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	HV Engineer (Shared)	4-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Works Program Manager	1-Sep-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Large Capex Manager	16-May-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Project Performance Engineer Region 2	9-Aug-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Capex Project Estimator	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Customer Capex Manager	16-May-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey North - EDPR	1420	Project Performance Engineer	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Service Delivery Mgr	1-Jan-12		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Contractor Performance Manager	16-May-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Works Program Manager	27-May-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Opex Maintenance Planner	1-Jun-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Capex Planner	1-Jun-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Contractor Performance Analyst	4-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Project Performance Engineer Region 1	1-Jun-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Large Capex Manager	4-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Capex Project Estimator	1-Jun-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Customer Capex Manager	1-Oct-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Contract Performance Engineer	4-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%
Operations	Service Delivey South - EDPR	1430	Project Performance Engineer	1-Jul-11		0	100.0%	0.0%	-	100.0%	0.0%

F Appendix F: Internal labour positions shared between Multinet and UED

Function	UED "home" Business Unit	UED "home" Cost Centre	Position	Start Date	End Date	Pre-7/13 UED/MG Alloc			Post-7/13 UED/MG Alloc		
						Allocator	UED%	MGDP%	Allocator	UED%	MGDP%
CEO Office	CEO Office - EDPR	1000	EA to CEO	1-Jul-11		0	75.0%	25.0%	-	75.0%	25.0%
CEO Office	CEO Office - EDPR	1000	CEO	10-Jan-05		0	75.0%	25.0%	-	75.0%	25.0%
CEO Office	Communcations, Media & Corporate Affairs - EDPR	1030	Corporate Affairs GM	1-Jul-11		0	75.0%	25.0%	-	75.0%	25.0%
CEO Office	Communcations, Media & Corporate Affairs - EDPR	1030	Communications & Corporate Affairs Manager	20-Apr-11		0	65.0%	35.0%	-	65.0%	35.0%
CEO Office	Communcations, Media & Corporate Affairs - EDPR	1030	CEO Office Admin Assistant	1-Sep-11		0	85.6%	14.4%	-	65.7%	34.3%
CEO Office	HR & Org Development - EDPR	1080	General Manager HR	1-Jul-11		0	75.0%	25.0%	-	75.0%	25.0%
CEO Office	HR & Org Development - EDPR	1080	HR Advisor	8-Nov-10		0	85.6%	14.4%	-	65.7%	34.3%
CEO Office	HR & Org Development - EDPR	1080	HR Advisor	1-Jul-13		0	85.6%	14.4%	-	65.7%	34.3%
CEO Office	HR & Org Development - EDPR	1080	Planning & Performance Manager	1-Jun-11		0	85.6%	14.4%	-	65.7%	34.3%
CEO Office	HR & Org Development - EDPR	1080	Programe support (mac)	1-Jul-11		0	50.0%	50.0%	-	50.0%	50.0%
CEO Office	HR & Org Development - EDPR	1080	Programe support (milena)	1-Jul-11		0	50.0%	50.0%	-	50.0%	50.0%
CEO Office	HR & Org Development - EDPR	1080	Programe support (bernie)	1-Jul-11		0	50.0%	50.0%	-	50.0%	50.0%
CEO Office	HR & Org Development - EDPR	1080	Admin Assistant	1-Mar-12		0	85.6%	14.4%	-	65.7%	34.3%
CEO Office	Internal Audit - EDPR	1010	Internal Audit Manager	28-Mar-11		0	65.0%	35.0%	-	65.0%	35.0%
CEO Office	Internal Audit - EDPR	1010	Internal Audit Manager	1-Jul-13		0	65.0%	35.0%	-	65.0%	35.0%
CEO Office	Internal Audit - EDPR	1010	Risk Manager	1-Jul-11		0	65.0%	35.0%	-	65.0%	35.0%
CEO Office	Strategy & Bus Development - EDPR	1090	Strategy & Business Development Analyst	1-Apr-12		0	65.0%	35.0%	-	65.0%	35.0%
CEO Office	Strategy & Bus Development - EDPR	1090	Strategy & Business Development Manager	1-Apr-12		0	75.0%	25.0%	-	75.0%	25.0%
Commercial Group	Commercial BAU - EDPR	1100	Commercial Mgr/General Counsel	19-May-08		0	75.0%	25.0%	-	75.0%	25.0%
Commercial Group	Commercial BAU - EDPR	1100	Senior Legal Advisor	1-Jul-11		0	50.0%	50.0%	-	65.0%	35.0%
Commercial Group	Commercial BAU - EDPR	1100	Commercial Admin Assistant	1-Jun-11		0	85.6%	14.4%	-	65.7%	34.3%
Finance & Admin	Administration - EDPR	1210	Assistant Company Secretary	1-Jul-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Administration - EDPR	1210	PA to CFO	1-Jul-11		0	75.0%	25.0%	-	75.0%	25.0%
Finance & Admin	Administration - EDPR	1210	Receptionist / Admin Asssistant	1-Jul-11		0	85.6%	14.4%	-	65.7%	34.3%
Finance & Admin	Administration - EDPR	1210	Receptionist / Admin Asssistant	1-Jul-11		0	85.6%	14.4%	-	65.7%	34.3%
Finance & Admin	Administration - EDPR	1210	Administration Mgr	1-Jul-11		0	85.6%	14.4%	-	65.7%	34.3%
Finance & Admin	Administration - EDPR	1210	Registry	30-May-11		0	85.6%	14.4%	-	65.7%	34.3%
Finance & Admin	Administration - EDPR	1210	Junior Admin	1-Jun-11		0	85.6%	14.4%	-	65.7%	34.3%
Finance & Admin	Finance - EDPR	1200	CFO	27-Oct-03		0	75.0%	25.0%	-	75.0%	25.0%
Finance & Admin	Finance - EDPR	1200	Planning & Analysis Manager	29-Jan-07		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Financial Analyst / Modeller	1-Jul-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Project Accountant	1-Jul-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Accounts Payable Officer	1-Jul-11		0	85.6%	14.4%	-	65.7%	34.3%
Finance & Admin	Finance - EDPR	1200	Accounts Payable Officer	1-Jul-13		0	85.6%	14.4%	-	65.7%	34.3%

Function	UED "home" Business Unit	UED "home" Cost Centre	Position	Start Date	End Date	Pre-7/13 UED/MG Alloc			Post-7/13 UED/MG Alloc		
						Allocator	UED%	MGDP%	Allocator	UED%	MGDP%
Finance & Admin	Finance - EDPR	1200	Financial Controller	29-Nov-10		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Financial Analyst	1-Jul-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Financial Analyst	1-Jul-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Management Accountant (IT focus)	15-Mar-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Management Accountant (with Treasury Experience)	4-Apr-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Treasury Settlements / Back Office Clerk	4-Apr-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	GM Corp Finance	14-Nov-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Credit Controller	1-Jun-11		0	85.6%	14.4%	-	65.7%	34.3%
Finance & Admin	Finance - EDPR	1200	Fixed Asset Accountant	1-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Graduate Financial Accountant	29-Feb-12		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Management Accountant	1-May-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Management Accountant	30-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Corporate Accountant	1-May-11		0	65.0%	35.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Tax Manager	1-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%
IT	Information Tech - EDPR	1300	CIO	30-Jun-11		0	75.0%	25.0%	-	75.0%	25.0%
IT	Information Tech - EDPR	1300	Personal Assistant	1-Feb-11		0	75.0%	25.0%	-	75.0%	25.0%
IT	Information Tech - EDPR	1300	Manager, IT Strategy and Planning	31-May-11		0	62.0%	38.0%	-	62.0%	38.0%
IT	Information Tech - EDPR	1300	Manager, IT Projects and Portfolio	31-May-11		0	62.0%	38.0%	-	62.0%	38.0%
IT	Information Tech - EDPR	1300	Manager, IT Service Delivery	1-May-11		0	62.0%	38.0%	-	62.0%	38.0%
IT	Information Tech - EDPR	1300	Manager, IT Risk and Assurance	18-Apr-11		0	62.0%	38.0%	-	62.0%	38.0%
IT	Information Tech - EDPR	1300	Project Manager	30-Jun-11		0	62.0%	38.0%	-	62.0%	38.0%
IT	Information Tech - EDPR	1300	IT Operations Analyst - Infrastructure	31-May-11		0	62.0%	38.0%	-	62.0%	38.0%
IT	Information Tech - EDPR	1300	IT Operations Analyst - Applications	31-May-11		0	62.0%	38.0%	-	62.0%	38.0%
IT	Information Tech - EDPR	1300	Project Business Analyst	31-May-11		0	62.0%	38.0%	-	62.0%	38.0%
IT	Information Tech - EDPR	1300	Business Applications Architect	31-May-11		0	62.0%	38.0%	-	62.0%	38.0%
IT	Information Tech - EDPR	1300	Technical Architect	31-May-11		0	62.0%	38.0%	-	62.0%	38.0%
IT	Information Tech - EDPR	1300	Industry Expert	31-May-11		0	62.0%	38.0%	-	62.0%	38.0%
IT	Information Tech - EDPR	1300	IT Client Services Support Manager	1-Jul-12			62.0%	38.0%		62.0%	38.0%
IT	Information Tech - EDPR	1300	IT Change Management Manager	1-Jan-12			62.0%	38.0%		62.0%	38.0%
IT	Information Tech - EDPR	1300	Security, Risk & Assurance Manager	1-Feb-12			62.0%	38.0%		62.0%	38.0%
IT	Information Tech - EDPR	1300	Data & Reporting Specialist	1-Jul-12			62.0%	38.0%		62.0%	38.0%
Operations	CMS incl. NCC - EDPR	1440	Customer & Market Services Mgr	1-Jul-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	CMS Admin Support	1-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Market Services & AMI Systems Manager	4-Jul-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Revenue Analyst	30-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%

Function	UED "home" Business Unit	UED "home" Cost Centre	Position	Start Date	End Date	Pre-7/13 UED/MG Alloc			Post-7/13 UED/MG Alloc		
						Allocator	UED%	MGDP%	Allocator	UED%	MGDP%
Operations	CMS incl. NCC - EDPR	1440	Revenue Analyst	1-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Revenue Analyst	1-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Revenue Manager	1-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Revenue Support Officer	1-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Credit Manager	1-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Revenue Accountant	1-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Recoverable Works Officer	30-Jun-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	[Back office Mgr] Market Interface	15-Aug-11		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Compliance Mgr [Facilities Access Manager]	1-Jul-13		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	NCC1 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC2 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC3 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC4 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC5 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC6 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC7 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC8 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC9 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC10 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC11 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC12 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC13 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC14 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC15 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC16 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC17 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC18 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC19 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC20 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC21 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC22 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC23 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC24 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC25 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC26 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%

Function	UED "home" Business Unit	UED "home" Cost Centre	Position	Start Date	End Date	Pre-7/13 UED/MG Alloc			Post-7/13 UED/MG Alloc		
						Allocator	UED%	MGDP%	Allocator	UED%	MGDP%
Operations	CMS incl. NCC - EDPR	1440	NCC27 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC28 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC29 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC30 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC31 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC32 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC33 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC34 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC35 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC36 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC37 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC38 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC39 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC40 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC41 - to be updated	1-Jul-13		0	70.0%	30.0%	-	70.0%	30.0%
Operations	CMS incl. NCC - EDPR	1440	NCC42 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	NCC43 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	NCC44 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	NCC45 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	NCC46 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	NCC47 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	NCC48 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	NCC49 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	NCC50 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	NCC51 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	NCC52 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	NCC53 - to be updated	1-Jul-13		0	60.0%	40.0%	-	60.0%	40.0%
Operations	CMS incl. NCC - EDPR	1440	[Strat and Tech Mgr] Resource 1	1-Jan-13		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	[Meter and Field Ops Mgr] Resource 6	1-Jan-13		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	[Metering project mgr] Resource 7	1-Jul-13		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	[Audit compliance controller] Resource 8	1-Jul-13		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	[Transition Mgr / Bus Perf Mgr] Resource 9	1-Jan-12		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Resource 10	1-Jul-13		0	65.0%	35.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Resource 11	1-Jul-13		0	65.0%	35.0%	-	65.0%	35.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	COO	1-Jul-11		0	75.0%	25.0%	-	75.0%	25.0%

Function	UED "home" Business Unit	UED "home" Cost Centre	Position	Start Date	End Date	Pre-7/13 UED/MG Alloc			Post-7/13 UED/MG Alloc		
						Allocator	UED%	MGDP%	Allocator	UED%	MGDP%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Personal Assistant	18-Apr-11		0	75.0%	25.0%	-	75.0%	25.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Administration Support	31-May-11		0	85.6%	14.4%	-	65.7%	34.3%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Technical Regulatory Compliance Engineer	1-Jul-13		0	65.0%	35.0%	-	65.0%	35.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Engineer	1-Jul-13		0	65.0%	35.0%	-	65.0%	35.0%
Operations	Network Intel. & Devel. - EDPR	1410	Asset Management Admin Support	1-Jul-11		0	85.6%	14.4%	-	65.7%	34.3%
Operations	Service Delivey North - EDPR	1420	Administration Support (Shared)	1-Oct-11		0	85.6%	14.4%	-	65.7%	34.3%
Regulatory Services	Regulatory Price Review - EDPR	1500	Regulatory Services Manager	11-Mar-86		0	75.0%	25.0%	-	75.0%	25.0%
Regulatory Services	Regulatory Price Review - EDPR	1500	Manager Market Rules & Governance	1-Jul-11		0	65.0%	35.0%	-	65.0%	35.0%
Regulatory Services	Regulatory Price Review - EDPR	1500	Administration Support	1-Jul-11		0	85.6%	14.4%	-	65.7%	34.3%
Regulatory Services	Regulatory Price Review - EDPR	1500	Compliance Analyst	1-May-11		0	65.0%	35.0%	-	65.0%	35.0%
Regulatory Services	Regulatory Price Review - EDPR	1500	Regulatory Analyst	1-Jan-13		0	65.0%	35.0%	-	65.0%	35.0%
Regulatory Services	Regulatory Price Review - EDPR	1500	Regulatory Analyst	15-Jun-09		0	65.0%	35.0%	-	65.0%	35.0%

G Appendix G: Internal labour positions directly attributable to UED, shared with Multinet after 30 June 2013

Function	UED "home" Business Unit	UED "home" Cost Centre	Position	Start Date	End Date	Pre-7/13 UED/MG Alloc			Post-7/13 UED/MG Alloc		
						Allocator	UED%	MGDP%	Allocator	UED%	MGDP%
Commercial Group	Commercial BAU - EDPR	1100	Legal Advisor	1-Jul-11		0	100.0%	0.0%	-	65.0%	35.0%
Commercial Group	Commercial BAU - EDPR	1100	Legal Advisor	1-Jul-11		0	100.0%	0.0%	-	65.0%	35.0%
Commercial Group	Commercial BAU - EDPR	1100	Commercial Manager (IT)	1-Feb-11		0	100.0%	0.0%	-	65.0%	35.0%
Commercial Group	Commercial BAU - EDPR	1100	Key Contract Manager	31-Jul-11		0	100.0%	0.0%	-	65.0%	35.0%
Commercial Group	Commercial BAU - EDPR	1100	Procurement / Contracts Manager	1-Oct-11		0	100.0%	0.0%	-	65.0%	35.0%
Commercial Group	Commercial BAU - EDPR	1100	Contract Manager	1-Jan-12		0	100.0%	0.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Treasurer	25-Mar-08		0	100.0%	0.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Transition 2	1-Jul-11		0	100.0%	0.0%	-	65.0%	35.0%
Finance & Admin	Finance - EDPR	1200	Transition 3	1-Jul-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Customer Relations Manager	27-May-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Customer & Stakeholder Relations Manager	16-May-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Network Account Manager	31-May-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Industry Development Manager	1-Jun-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Stakeholder & Community Relations Advisor	16-May-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Retail Account Manager	1-Jul-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Customer Relations Coordinator	27-May-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Customer Relations Coordinator	27-May-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Customer Relations Coordinator	27-May-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Customer Claims Coordinator	27-May-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	CMS incl. NCC - EDPR	1440	Customer Claims Coordinator	27-May-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Compliance & Environmental Manager	1-Jun-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Emergency & Security Risk Manager	16-May-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Environmental Performance Manager	16-May-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Bushfire Mitigation Officer	6-Jun-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Health & Safety Manager	1-Jan-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Work Practices Manager	1-Apr-11		0	100.0%	0.0%	-	65.0%	35.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	Health & Safety Performance Analyst	1-Jul-11		0	100.0%	0.0%	-	65.0%	35.0%

H Appendix H: Internal labour positions directly attributable to Multinet, shared with UED after 30 June 2013

						Pre-7/13 UED/MG Alloc			Post-7/13 UED/MG Alloc		
Function	UED "home" Business Unit	UED "home" Cost Centre	Position	Start Date	End Date	Allocator	UED%	MGDP%	Allocator	UED%	MGDP%
Commercial Group	Commercial BAU - EDPR	1100	Multinet Commercial/Contracts Manager	24-Mar-11		0	0.0%	100.0%	-	65.0%	35.0%

I Appendix I: Multinet internal labour costs forecast to be capitalised in whole or in part

Function	UED "home" Business Unit	UED "home" Cost Centre	Position	Unique Identifier	Start Date	Pre-7/13 UED/MG Alloc			Post-7/13 UED/MG Alloc			Opex/Capex Allocation			
						Allocator	UED%	MGDP%	Allocator	UED%	MGDP%	Change to Allocation made?	Opex%	IT Capex%	Network Capex%
IT	Information Tech - EDPR	1300	CIO	64	30-Jun-11	0	75.0%	25.0%	-	75.0%	25.0%		56.0%	44.0%	0.0%
IT	Information Tech - EDPR	1300	Manager, IT Strategy and Planning	66	31-May-11	0	62.0%	38.0%	-	62.0%	38.0%		66.0%	34.0%	0.0%
IT	Information Tech - EDPR	1300	Manager, IT Projects and Portfolio	67	31-May-11	0	62.0%	38.0%	-	62.0%	38.0%		-	100.0%	0.0%
IT	Information Tech - EDPR	1300	Project Manager	70	30-Jun-11	0	62.0%	38.0%	-	62.0%	38.0%		-	100.0%	0.0%
IT	Information Tech - EDPR	1300	Project Business Analyst	73	31-May-11	0	62.0%	38.0%	-	62.0%	38.0%		-	100.0%	0.0%
IT	Information Tech - EDPR	1300	Business Applications Architect	74	31-May-11	0	62.0%	38.0%	-	62.0%	38.0%		66.0%	34.0%	0.0%
IT	Information Tech - EDPR	1300	Technical Architect	75	31-May-11	0	62.0%	38.0%	-	62.0%	38.0%		66.0%	34.0%	0.0%
Operations	COO incl. C&E,H&S,Risk - EDPR	1400	COO	170	1-Jul-11	0	75.0%	25.0%	-	75.0%	25.0%		75.0%	0.0%	25.0%
Operations	Gas Asset Mgt - EDPR	1450	Senior Metering Engineer	186	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		40.0%	0.0%	60.0%
Operations	Gas Asset Mgt - EDPR	1450	Metering Engineer	187	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		40.0%	0.0%	60.0%
Operations	Gas Asset Mgt - EDPR	1450	Senior Asset Integrity & Performance Analyst	188	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		75.0%	0.0%	25.0%
Operations	Gas Asset Mgt - EDPR	1450	Asset Performance Engineer	189	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		25.0%	0.0%	75.0%
Operations	Gas Asset Mgt - EDPR	1450	Senior Asset Performance Engineer	190	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		25.0%	0.0%	75.0%
Operations	Gas Asset Mgt - EDPR	1450	Asset Performance Engineer	191	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		25.0%	0.0%	75.0%
Operations	Gas Asset Mgt - EDPR	1450	Senior Engineer Network Planning	192	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		25.0%	0.0%	75.0%
Operations	Gas Asset Mgt - EDPR	1450	Senior Engineer Network Planning	193	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		25.0%	0.0%	75.0%
Operations	Gas Asset Mgt - EDPR	1450	Engineer Network Planning	194	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		25.0%	0.0%	75.0%
Operations	Gas Asset Mgt - EDPR	1450	Multinet Asset Manager	195	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Engineer (Graduate)	197	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Engineer (Graduate)	198	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Service Delivery Manager - North	199	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractors Performance Manager	200	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractors Performance Analyst	201	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractors Performance Engineer	202	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Service Delivery Admin Support	203	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Large Capex Manager (North & South)	204	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Project Performance Engineer (North & South)	205	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Capex Project Estimator (North & South)	206	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		-	0.0%	100.0%
Operations	Gas Asset Mgt - EDPR	1450	Service Delivery Manager - South	207	1-Jan-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractor Performance Manager	208	1-Jan-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractor Performance Analyst	209	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Contractor Performance Engineer	210	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Work Practices officer - Gas	211	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		50.0%	0.0%	50.0%
Operations	Gas Asset Mgt - EDPR	1450	Procurement - Contract Administrator	212	1-Jul-13	0	0.0%	100.0%	-	0.0%	100.0%		-	0.0%	100.0%

