### **ERGON ENERGY**



# Annual Reporting Regulatory Information Notice

Submission (Audited)
1 July 2016 to 30 June 2017

31 October 2017

#### **Version Control**

Version	Date	Description
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#### **GLOSSARY**

ACRONYM	GLOSSARY TERM	
Ergon Energy 1617- 17 Annual RIN	Ergon Energy's 2016-17 Annual Reporting Regulatory Information Notice	
ABS	Australian Bureau of Statistics	
ACS	Alternative Control Services	
AER	Australian Energy Regulator	
AER FDD	AER's 2015-2020 Distribution Determination for Ergon Energy	
CAC	Connection Asset Customers	
CAM	AER approved Cost Allocation Method	
Capex	Capital expenditure	
CBD	Central business district	
CICW	Customer Initiated Capital Works	
CPI	Consumer Price Index	
DM	Demand Management	
DMIA	Demand Management Innovation Allowance	
DMIS	Demand Management Incentive Scheme (AER)	
DNSP	Distribution Network Service Provider	
DUOS	Distribution Use of System	
EDNC	Electricity Distribution Network Code	
EECL	Ergon Energy Corporation Limited	
EEQ	Ergon Energy Queensland Proprietary Limited	
EG	Embedded Generator	
EQL	Energy Queensland Limited	
Ergon Energy	Ergon Energy Corporation Limited	
Excel	Microsoft Excel	
FACTS	Feedback and Claim Tracking System	
FDRSTAT	FeederStat	
FiT	Feed-in-tariff	
GSL	Guaranteed Service Level	
HV	High voltage	
ICC	Individually Calculated Customer	

ACRONYM	GLOSSARY TERM
IVR	Interactive Voice Recording
KM	Kilometre
kV	Kilovolt
LV	Low voltage
LR	Long Rural
MED	Major event day
MVA	Megavolt ampere
NEL	National Electricity Law
NER	National Electricity Rules
NERL	National Energy Retail Law
NMI	National Metering Identifier
Nominal	With respect to dollars – means dollar of the day
Notice	Regulatory Information Notice
Opex	Operating expenditure
PTRM	Post Tax Revenue Model
QTC	Queensland Treasury Corporation
Real	With respect to dollars – means constant dollars at a specific date.
RIN	Regulatory Information Notice
ROAMES	Remote Observation Advanced Modelling Economic Simulation
Rules	National Electricity Rules
SAC	Standard Asset Customer
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SCS	Standard Control Services
SPARQ	SPARQ Solutions Pty Ltd
SR	Short Rural
STPIS	Service Target Performance Incentive Scheme (AER)
UR	Urban
W	Watt
WSP	WSP Australia Pty Ltd
ZSS	Zone-Substation

#### 1. INTRODUCTION

On 3 February 2016, the Australian Energy Regulator (AER) issued a Regulatory Information Notice (Notice) under Division 4 of Part 3 of the National Electricity Law (NEL) to Ergon Energy Corporation Ltd (ABN 50 087 646 062) (Ergon Energy).

The Notice requires Ergon Energy to provide and to prepare and maintain the information in the manner and form specified in the Notice.

Ergon Energy notes that the AER's Notice indicates that the AER require the information for the performance or exercise of its functions or powers conferred on it under the NEL or the National Electricity Rules (NER), namely to:

- monitor compliance with the distribution determination that applies to Ergon Energy for the regulatory control period that commenced on 1 July 2015;
- publish reports relating to the financial or operational performance of Ergon Energy; and
- prepare for the making of future distribution determination that will apply to Ergon Energy for the regulatory control period commencing on 1 July 2020; and
- assist the AER to determine whether it should exercise its powers to disclose information obtained under this Notice in respect of the distribution services provided by way of the electricity distribution network Ergon Energy operates in Queensland.

The Notice requires Ergon Energy to provide the information specified in Schedule 1, audited in accordance with Appendix D to the Notice in accordance with section 28M(e) of the NEL having prepared (and maintained) the information in the manner and form specified in Schedule 2 to the Notice. The information specified is required to be verified using the statutory declaration in Appendix C to the Notice, in accordance with section 28M(d).

Ergon Energy is required to deliver the said information electronically to <u>AERInquiry@aer.gov.au</u>, or the AER secure file transfer on or before 5:00 pm Australian Eastern Daylight Time on 31 October 2017 in respect of information for the 2016-17 regulatory year (1 July 2016 to 30 June 2017) (the 'Submission'). The submission is to be accompanied by the Audit and Review Report(s) and a signed Statutory Declaration over audited information.

It is also noted that the information provided in response to this Notice will constitute the provision of an annual report for the purposes of paragraph 3.1.4.1 of the AER, *Demand management incentive scheme for Ergon Energy (as set out in the 2015-20 Distribution Determination)*.

Accordingly, Ergon Energy is pleased to submit this Submission (audited) in relation to the 2016-17 Regulatory Year (**Ergon Energy 2016-17 Annual Reporting RIN, Submission**), as made by:

**Ergon Energy Corporation Limited** 

PO Box 1090

Townsville Qld 4810

Enquiries or further communications should be directed to:

Jenny Doyle

General Manager Regulation & Pricing

Ergon Energy Corporation Limited

Email: <u>jenny.doyle@energyq.com.au</u>

Mobile: 0427 156 897

#### 2. CONFIDENTIAL INFORMATION

#### 2.1 Requirement

In accordance with Schedule 1 of the Notice, if Ergon Energy makes a claim for confidentiality over any information provided in accordance with this Notice, Ergon Energy must:

- comply with the requirements of the AER's revised Better Regulation Confidentiality Guideline (30 August 2017);
- provide any details of a claim for confidentiality in response to the above, at the same time as making the claim for confidentiality; and
- confirm, in writing, that consent is given for the AER to disclose all other of Ergon Energy's information (provided in the submission) on the AER website, except the confidential version of information the subject of a confidentiality claim under paragraph 10.1.

The AER's Confidentiality Guidelines sets out the framework for how the AER will handle confidentiality claims and requirements for Ergon Energy.

A confidentiality claim, by itself, is insufficient to prevent disclosure. Both the NEL and the *Competition and Consumer Act 2010 (Cth)* provide for the AER to disclose confidential information in certain circumstances. In particular, section 28ZB of the NEL allows the AER to disclose information where:

- disclosure would not cause detriment to the information provider or the person from whom the information provider received the information; or
- public benefit in disclosing the information outweighs that detriment.

Making a confidentiality claim in the manner mentioned above will reduce the chance that the AER will exercise these powers. Ergon Energy notes the AER would provide notice and an opportunity to comment prior to exercising these powers.

The AER requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1, which includes both the Templates, Basis of Preparation as well as any attachments provided in response to requirements.

#### 2.2 Response

Ergon Energy notes that regard has been given to the AER's Confidentiality Guidelines in assessing confidentiality claims in preparation of its 2016-17 Annual Reporting RIN. Ergon Energy has not identified any claims for confidentiality in regards to its 2016-17 Annual Reporting RIN response.

Of note, Ergon Energy contacted its independent auditors (the Queensland Audit Office, and WSP to advise the AER's ability to disclose audit or review reports issued to Ergon Energy in respect of its 2016-17 Annual Reporting RIN, subject to any confidentiality claims made. Confirmation was obtained from the auditors agreeing to the release of audit or review reports / audit opinions.

#### 3. INFORMATION TEMPLATES

#### 3.1 Requirement

Schedule 1, paragraph 1.1 (a) of the Notice requires Ergon Energy to provide all information required in the Financial Information Templates, being the information required in the Microsoft Excel workbook attached as Appendix B to the Notice. Furthermore, Schedule 1 paragraph 1.1(b) of the Notice requires the provision of the information required in the Non-Financial Information Templates in the Microsoft Excel workbook attached at Appendix B to the Notice.

Schedule 2, paragraph 1.1 requires the Microsoft Excel workbooks to be prepared in a manner and form specified in the worksheets therein and reiterates that the principles and requirements of the Notice are to be adhered to. Of note,

- Data for cells in Regulatory Templates coloured grey, or containing formulae do not require input and must not be amended by Ergon Energy.
- Where Actual Information (defined term) cannot be provided, Ergon Energy is required to provide Estimated Information (defined term) and additional information in relation to Estimated Information is to be provided in accordance with Basis of Preparation requirements (refer section 4).

In relation to the 2016-17 Regulatory Year, the AER requires Ergon Energy to verify information provided in the templates by way of an Audit in accordance with Appendix D and a Statutory Declaration in accordance with Appendix C to the Notice.

#### 3.2 Ergon Energy 2016-17 Annual Reporting RIN Templates

#### 3.2.1 Completed RIN Templates

Ergon Energy's Submission of the completed 2016-17 Annual Reporting RIN templates (2016-17 AR RIN Templates), being the Microsoft Excel (Excel) workbooks at Appendix B to the Notice, are provided as attachments to this response as follows:

- Financial Information Templates, and
- Non-Financial Information Templates.

Refer to: Table 7-1: List of Attachments. Of note, there was no requirement to submit anything other than a consolidated set of Templates. However, Actual and Estimated information has been identified in the relevant Basis of Preparation.

#### 3.2.2 Key Information Systems Used

The table below gives a listing and brief description, of key information systems that Ergon Energy currently uses to provide its Distribution Services and which have been utilised in providing the information required in the templates (referred to as relevant in Basis of Preparation responses provided in section 4).

It is emphasised that this is not an exhaustive list of all of the information systems that Ergon Energy uses. For further explanations of specific processes and systems used to report RIN requirements refer to section 3.2.2 of this document.

Table 3-2: Key Information Systems used by Ergon Energy

System	Description	
Artemis 7	Manages investment portfolio including project planning, scheduling and tracking, program and project governance and financial and resource management	
Customer Management System (CMS)	Used with FACOM to manage customer service delivery	
CSA	Current state assessment database used to record transformer capacity data for planning purposes	
DBMS (Database Management System)	"Oracle" is a centralised database that stores information and supports applications that are used to facilitate data management. Corporate applications and SQL scripts developed by Ergon Energy's Network Performance Group are used to extract information from Oracle to populate the RIN templates. All reporting relevant to the RIN is performed by the Network Reliability Group using SQL scripts and applications that run on the Oracle database.	
DCOS Model	Distribution Cost of Supply (DCOS) Model is used in the network tariff setting process, where the output of the model is 'forecast revenue' for each customer group to be recovered via distribution tariffs. The DCOS Model output displays forecast revenues by geographic zones (East, West, Mount Isa) and customer categories (ICC, CAC, EG, SAC, UnMet&STL) with the Annual Charge disaggregated by Fixed Charge, Actual Demand Charge, Capacity Charge, and Volume Charge.	
COGNOS	Budget planning modules	
CONNECT	The Connect Application is used to maintain the feeder type data set.	
ECORP  ECORPMAIN contains the network asset topology utilised by Connect, Switching Sheet Writer and reliability reporting apps. The E hierarchy is primarily manually maintained by Network Data Officers a Connection Officers i.e. association of premises with substations.		
	An automated process (GELO) exist which updates selected feeders (approx. 3 feeders) in ECORPMAIN from NETAPP-GISEP. The ECORPMAIN model contains network objects like substations and switches required to model network connectivity it does not contain other assets e.g. poles, conductors, streetlights etc.	
ESATS	Standing data repository containing extracted data in tables storing all mandated NMI standing data.	
Ellipse	Ellipse is a large Enterprise Resource Planning (ERP) application used to manage assets, works, finance, supply chain, logistics, human resources and payroll. This application represents the logical group of modules of the Ellipse application which support the Financial Management sub segment.	
	Ellipse was commissioned on 4 September 2006 as the Management and Financial reporting tool. The chart of accounts structure includes a district code and four segments forming an account line of four alphabetic and seventeen numeric characters.	

System	Description	
	District: Separate legal entities of Ergon Energy consisting of parent entity and subsidiaries;  Responsibility Centre: Business unit groups responsible for revenues, expenses for a function/ location;  Activity: Type of work being undertaken. Also used for balance sheet classification: asset, liability, equity and Work in Progress (WIP);  Product: Product or service being provided, for example High Load Escort; and Element: the nature of the revenue received or expense incurred.  Each revenue, cost element, asset and liability that when combined constitute the sum of Ergon Energy activities, and any associated adjustment to these, must have its origin in an audited Statutory Accounts	
FeederStat	Ergon Energy's outage management system. It pinpoints where a particular premise is located and what feeder or substation it is connected to. FeederStat is used when faults and outages are being analysed and facilitates the NCC logging fault related calls as they are received and providing information to customers on restoration times.	
	FeederStat is the primary outage management system employed by Ergon Energy to capture, record, action and report: planned and unplanned outages. FeederStat was internally developed by Ergon Energy and is a common application used across all sites with access to Oracle which is used to both input and extract outage data and information	
Financial Asset Register (FAR)	Accounting asset register containing the RAB cost and life information	
Lightmap	Lightmap is a geographical information system that provides information in relation to spatial location of public lighting assets and asset information. It is used as Public Lighting Management software.	
NEMLink (MDP)	The Meter Data Provider's Market Gateway.	
Outage Management System (OMS)	Oracle-based system used to export information about individual unplanned outages	
PEACE	PEACE is a web based premise information and billing system and has been implemented to support Ergon Energy in a Full Retail Competition (FRC) environment.  PEACE interacts with multiple systems, enabling data to be sent to and received by MSATS (Market Settlement and Transfer Solution).  The two major components of PEACE are:  1. PEACE Customer Information System (CIS) - which enables us to: a. Store and update customer premise details; b. Create and manage Network Tariffs, reads and invoices; c. View External References (specific data required by Ergon Energy to publish to the Market, such as NMI and FRMP); d. Create and transition PEACE work requests (PTJs - Process Tracking Jobs);  2. PEACE Market Solution - which enables us to: a. Validate Market Transactions from external parties via Australian Energy Market Operator (AEMO) and business Rules;	

System	Description	
PLUMS	<ul> <li>b. Publish mandatory data fields (Standing Data) in MSATS;</li> <li>c. Manage customer transfers, Service Orders and Change Requests and process these to PEACE CIS;</li> <li>d. Forward data to the relevant systems, e.g. MARS, PEACE CIS and MSATS.</li> <li>PEACE was implemented in March 2016.</li> <li>Public lighting and unmetered supplies – intermediate system between Smallworld and PEACE for billing unmetered customers.</li> </ul>	
ROAMES	Remote Observation Automated Modelling Economic Simulation (ROAMES) LiDAR program. ROAMES technology originally developed by Ergon Energy and partner organisations creates precise, 3D geo-spatial representations of network assets such as substations, poles and wire infrastructure to be displayed in a Google Earth-like database. The sheer size of Ergon Energy's distribution area was a key motivator for finding smarter ways of managing the assets and the surrounding environment. It is anticipated that the information ROAMES provides will result in reduced maintenance and planning costs, while also increasing the safety and reliability of electricity supply for our customers and communities.	
	The large volume of data captured during ROAMES flights is processed to enable reliable and precise measurement of Ergon Energy's electricity network and surrounding objects such as buildings, terrain and vegetation. Information is then used to create a precise, virtual representation of Ergon Energy's network infrastructure throughout Queensland, providing vital information for more effective and cost efficient vegetation maintenance and asset planning.	
	From 1 March 2015, this capability is supplied via a Service Level Agreement from an unrelated corporation called ROAMES Asset Services Pty Limited.	
SCAMS	Substation Condition Assessment and Monitoring System used to manage assets and as a source of ZSS capacity data	
Substation Investment Forecasting Tool (SIFT)	Used by planning team to plan substation augmentation and growth	
Supervisory Control and Data Acquisition (SCADA)	While SCADA is a general term, it is used within Ergon Energy to refer specifically to the ABB system used for Network Operations.	
Smallworld	A geographic information system used to manage the spatial location of assets.	
Smallworld Oracle Replicated (SOREP) Spatial database.	Replicated version of Smallworld Electrical Data. Reference by Aires, Mapguide, Google Earth, Schematics etc.	
Statistical Metering Database (SMDB)	Consists of Access databases maintained by Ergon Energy Planning department to capture the history of Ergon Energy's interval data for demand and weather (sourced from the Bureau of Meteorology data).	
Tree Management Database (TMD)	Database used by vegetation management contractors to record trees trimmed and dates work undertaken	

#### 4. BASIS OF PREPARATION

#### 4.1 Requirement

Schedule 1 paragraph 1.1 (d) of the Notice requires Ergon Energy to provide in accordance with the notice, and the Principles and Requirements in Appendix A, a Basis of Preparation demonstrating how Ergon Energy has complied with the Notice, in respect of for all information provided in Appendix B (being the Excel workbooks Financial Information Templates and Non-Financial Information Templates). Specifically, the Basis of Preparation must:

- demonstrate how the information provided is consistent with the requirements of the Notice;
- explain the source from which Ergon Energy obtained the information provided; and
- explain the methodology Ergon Energy applied to provide the required information, including any assumptions Ergon Energy made.

In circumstances where Ergon Energy cannot provide input for a Variable using Actual Information and therefore must provide input using Estimated Information, Ergon Energy must also comment as to:

- why an estimate was required, including why it was not possible to use Actual Information;
- the basis for the estimate, including the approach used, assumptions made and reasons why the estimate is a best estimate, given the information sought in the Notice; and
- what steps Ergon Energy is taking to ensure it can provide the information in the future.

Ergon Energy may provide additional detail beyond the minimum requirements if Ergon Energy considers it may assist a user to gain an understanding of the information presented in the regulatory templates.

When carrying out an audit or review as specified in Appendix D to the Notice, an auditor or assurance practitioner shall have reference to Ergon Energy's Basis of Preparation.

The AER requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1, which includes both the Templates, Basis of Preparation as well as any attachments provided in response to requirements.

#### 4.2 Basis of Preparation Applied By Ergon Energy

#### 4.2.1 Addressing Minimum Requirements

The minimum requirements specified in the Notice are addressed for each of the variables or group of variables contained in the Annual Reporting RIN information templates (Financial Information and Non-Financial Information), in the Basis of Preparation documents prepared by Ergon Energy and provided as attachments (summarised in Table 17-1: List of Attachments).

Unless otherwise noted, the following general comments are made as relevant to all variables in addressing the minimum requirement:

- Ergon Energy has referred to Instructions provided and Definitions contained in Appendix F of the Notice.
- Financial inputs (monetary values) are presented in nominal terms unless otherwise stated.

- Information has been reported for service categories: Standard Control Services (SCS) (and where relevant – Network Services) and Alternative Control Services (ACS) in accordance with RIN requirements and with reference to the Instructions and Definitions.
- As relevant (and as noted in relevant sections herein, or as attachments provided), Ergon Energy has
  included any additional information required to be prepared in accordance with the requirements of the
  Notice (for example Schedule 1).
- Where relevant, regard has been given to ongoing clarifications provided by the AER to various Network Service Providers in its Issues Registers or separate correspondence, including as part of the release of amended templates.

#### 4.2.2 Additional Requirements

The additional requirements noted in Table 4-1 were identified in the Notice issued to Ergon Energy, as being requirements that require provision of additional information or attachments over and above completed templates or Basis of Preparation.

Responses to these requirements are made as attachments to the applicable Basis of Preparation for templates as summarised in Table 17-1: List of Attachments.

**Table 4-1: Additional Requirements (Attachments to Basis of Preparation)** 

Notice Reference Paragraph	Requirement	Attachment(s) to Template BOP
Schedule 1 Para 1.1(c)	Provide a Microsoft Excel workbook or other information that reconciles and explains Adjustments between the Audited Statutory Accounts and the Financial Information Templates.	Reconciliation (Audited Statutory Accounts and Regulatory Accounting Statements)
	Ergon Energy must separately list each Adjustment made to derive the Financial Information Templates. For each Adjustment made:  specify the amount of Adjustment; describe the nature and basis of each Adjustment	EE1617AR RECON
Schedule 1 Para 1.1(f)	Provide the Capitalisation Policy for the Relevant Regulatory Year. If Ergon Energy has previously provided the AER with the policies sought in paragraphs 1.1(f) it is not necessary for Ergon Energy to provide the policy again unless it identified a material change in response to paragraphs 5.1 (refer below).  NOTE: Ergon Energy's capitalisation policy is incorporated in its two accounting policies 'Property Plant and Equipment' and 'Intangible Assets' which provide guidance in respect of:  Key criteria for recognition of an asset; and Clarification of accounting treatment in respect of initial recognition as an asset and subsequent expenditure, including refurbishment costs. Although there are no material changes to these policies,	Capitalisation Policies: Intangible Assets, Property, Plant and Equipment  EE1617AR IA  EE1617AR PPE

Notice Reference Paragraph	Requirement	Attachment(s) to Template BOP
	they have been disclosed as Attachments for completeness.	
Schedule 1 paragraph 3.1 – 3.4	In respect of cost allocation to the distribution business Ergon Energy is to identify each expenditure or revenue item in Worksheet 8.1 (Income Statement) of the Financial Information Templates that is directly attributable to the Distribution Business. Furthermore, schedule 1 paragraph 3.2 requires identification of each Item that is not directly attributable in the Financial Information Templates:  but is allocated on a causation basis to the Distribution Business; else  cannot be allocated on a causation basis to the Distribution Business. For each of the items identified not directly attributable but is allocated on a causation basis to the Distribution Business, schedule 1 paragraph 3.3 requires information that:  states the amount of the Item that has been allocated; explains the method of allocation and reasons for choosing that method; and states the numeric amount of the allocator(s) used. For each of the items identified as not directly attributable and that cannot be allocated on a causation basis to the Distribution Business, schedule 1 paragraph 3.3 requires information that state its amount; state whether it was material; explain the method of allocation and reasons for choosing that method; and explain the reason(s) why it cannot be allocated on a causation basis.	Cost Allocation to the Distribution Business  EE1617AR CADB
Schedule 1 Para 4.1 – 4.4	In relation to Ergon Energy's Service segments (refers to standard control services, ACS, negotiated services), identify each Item in the Financial Information Templates that is:  directly attributable from the Distribution Business to a service segment; and state the amount of the <i>Item</i> that has been directly attributable to a service segment.  not directly attributable but is allocated on a causation basis from the Distribution Business to a service segment; and	Cost Allocation to Service Segments EE1617AR CASS

Notice Reference Paragraph	Requirement	Attachment(s) to Template BOP
	<ul> <li>state the amount of the Item that has been allocated;</li> <li>explain the method of allocation and reasons for choosing that method; and</li> <li>state the numeric amount of the allocator(s) used.</li> <li>not directly attributable and cannot be allocated on a causation basis from the Distribution Business to a service segment.</li> <li>state the amount of the Item and whether it was material;</li> <li>explain the method of allocation and reasons for choosing that method; and</li> <li>explain the reason(s) why it cannot be allocated on a causation basis.</li> </ul>	
Schedule 1 Para 6	Provide reporting in relation to Ergon Energy's Demand Management Incentive Allowance (DMIA).  Note: Information provided in response to paragraph 6 of	Ergon Energy 1617 Demand Management Innovation Allowance (Annual Report)
	Schedule 1 to this Notice constitutes the provision of an annual report for the purposes of paragraph 3.1.4.1 of the Demand Management Incentive Scheme (DMIS) applying to Ergon Energy (as set out in the 2015-20 Distribution Determination).	

# 5. REGULATORY ACCOUNTING PRINCIPLES AND POLICIES

#### 5.1 Requirement

Schedule 1 paragraph 1.1(e) of the notice requires Ergon Energy to provide its Regulatory Accounting Principles and Policies applicable for the Relevant Regulatory Year.

Furthermore, Ergon Energy is also required to identify in schedule 1 paragraph 1.2, all material changes between the Regulatory Accounting Principles and Policies provided for the Relevant Regulatory Year, and that provided for the previous regulatory year. For each change identified Ergon Energy must:

- explain the nature of and the reasons for the change; and
- quantify the effect of the change on information in the Financial Information Templates for the Relevant Regulatory Year.

Of note, Schedule 1 paragraph 1.4 suggests that if Ergon Energy has previously provided the AER with the policies it is not necessary to provide them again unless a material change is identified in response to paragraph 1.2.

The AER requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1, which includes both the Templates, Basis of Preparation as well as any attachments provided in response to requirements.

#### 5.2 Response

Ergon Energy's Statement of Policy is disclosed below.

#### 5.2.1 Statement of Policy – Regulatory Accounting Principles and Policies

Financial Information Templates are derived from statutory accounts which comply with accounting standards and Ergon Energy's accounting policies (Property, Plant & Equipment and Intangible Assets) and the AER approved Cost Allocation Method (August 2014). They also comply with RIN instructions, definitions, principles and requirements and written AER clarifications where sought.

### 5.2.2 Material Changes in Statement of Policy – Regulatory Accounting Principles and Policies

Although this is the first year Ergon Energy's Statement of Policy (Section 5.2.1) has been disclosed, there have been no material changes between the current and prior regulatory year to the application of the Regulatory Accounting Principles and Polices in preparing the AR RIN.

## 6. COST ALLOCATION METHOD - STATEMENT OF POLICY

#### 6.1 Requirement

Schedule 1 paragraph 1.1(g) of the Notice requires Ergon Energy to provide the statement of policy determining the allocation of overheads in accordance with the approved Cost Allocation Method (CAM) for the Relevant Regulatory Year.

Furthermore, schedule 1 paragraph 1.3 also requires Ergon Energy to identify material changes between the statement of the policy determining the allocation of overheads in accordance with the approved CAM, for the Relevant Regulatory Year and the previous regulatory year, and for each change identified:

- explain the nature of and the reasons for the change; and
- quantify the effect of the change on information in the Financial Information Templates for the Relevant Regulatory Year

Of note, under Schedule 1 paragraph 1.4, if Ergon Energy has previously provided the AER with the policy sought it is not necessary to provide it again annually, unless a material change is identified in response to paragraphs 1.3 of schedule 1.

The AER requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1, which includes both the Templates, Basis of Preparation as well as any attachments provided in response to requirements.

#### 6.2 Response

Ergon Energy's Statement of Policy is disclosed below.

#### 6.2.1 Statement of Policy – Cost Allocation Method

Ergon Energy complies with the CAM, in accordance with Part F - Cost Allocation, Rule 6.15 Cost Allocation, clause 6.15.1 Duty to comply with CAM of the NER.

Where practical, costs are directly attributed to categories of distribution services and unregulated activities.

Shared costs are causally allocated where support services are provided across the Ergon Energy Group, prior to allocating the Regulated overheads in proportion to the Regulated direct costs incurred Ergon Energy's current approved CAM is available on the AERs website.

#### 6.2.2 Material Changes in Statement of Policy – Cost Allocation Method

There have been no material changes to Ergon Energy's Statement of Policy – Cost Allocation Method.

# 7. CAPEX AND OPEX - EXPLANATION FOR MATERIAL VARIANCES

#### 7.1 Requirement

Schedule 1 paragraph 1.5 of the Notice requires Ergon Energy to identify each difference (where the difference is equal to or greater than  $\pm$  10 per cent) between the amount reported in the *Financial Information Templates* and the amount provided for in the *2015-20 Distribution Determination* for Opex and Capex reported in the response to paragraph 1.1(a) (being, information required in the *Financial Information Templates* in the Microsoft Excel workbook attached at Appendix B).

Paragraph 1.6 then requires Ergon Energy to explain all Material differences between the *Financial Information Templates* and the amount provided for in the 2015-20 Distribution Determination.

The AER requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1, which includes both the Templates, Basis of Preparation as well as any attachments provided in response to requirements.

#### 7.2 Response

Of note, Ergon Energy has provided explanations to variances for SCS Capex in Table 8.2.2 – (Capex by Purpose - Material Difference Explanation), and SCS Opex in Table 8.4.3 – (Operating & Maintenance Expenditure - Explanation of Material Difference). Additional explanations for variances which are unable to be entered in these tables, are also set out below.

#### **7.2.1** Capex

Table 7-1: Explanations to variances – Standard Control Services

Description	Reasons for material difference
Augmentation capex	Sub-transmission investment needs were lower during the year due to improved customer reliability and a changing customer load shape; and Distribution investment needs were lower as distributed PV generation softened day-peaking load profiles, changing customer energy use and network improvements.
Customer connection capex	Customer Connection Capex was materially lower than the 2016/17 CPI adjusted forecast. The main driver of the reduction is attributed to a significant reduction in Commercial & Industrial connection requests.
Metering  Distribution investment needs were lower than the 2016/17 forecast le distributed PV generation softened day-peaking load profiles, changing customer energy use and network improvements.	
Non-network capex	Non-network capital expenditure is below forecast due principally to lower than anticipated augmentation and connections activity which has resulted in reduced vehicle usage and consequently fewer replacement vehicles being required. Property expenditure is lower than anticipated due to earlier completion of major building works.

Table 7-2: Explanations to variances – Alternative Control Services

Description	Reasons for material difference
Connections	Connection services such as Real Estate Developments and Large Customer Connections are subject to price regulation. As such, there are no approved capex forecasts to report against actuals.
Public Lighting	Public Lighting Installation customer initiated capital works has slowed reflective of an economic slow-down in regional Queensland. Public Lighting Replacement Capex for Street lighting has increased to similar levels to 2014/15 which is due to more defects identified as requiring replacement.

#### 7.2.2 Opex

Table 7-3: Explanations to variances – Standard Control Services

Preventive Maintenance	Variance is attributable to a variety of factors including;  • A trade off in the CPI adjusted forecast categories between preventive and corrective maintenance; and  • Higher levels of facility costs (local council rates and electricity charges) than forecast for substation and communication sites
Corrective Maintenance	Variance is attributable to a variety of factors including;  • A trade off in the forecast categories between preventive and corrective maintenance;  • Efficiencies in the vegetation management program reflective of improved processes, analysis and application of ROAMES information and management intervention;  • Reduced number of non-compliance instances against acceptance criteria identified during the routine maintenance process resulting in less non-routine maintenance work across several asset classes
Forced Maintenance	Attributed to impact from Tropical Cyclone Debbie during March 2017, where all AER forecasts were required to be exclusive of major events.
Network Operations	Variance is attributable to a variety of factors including;  • Direct impact of Tropical Cyclone Debbie on Operational Control Centre costs  • Higher than forecast costs associated with data carrier services for remotely accessed equipment
Other Operating Costs	Other operating costs have declined synonymously with the reduction in total operating costs
Training	Training costs have decreased driven by a reduction in staff numbers.
Feed-in-Tariff	Actual costs have been excluded from Other Operating cost 2016-17 in accordance with the AER's confirmation email received during May 2017.  These costs are reported in the Jurisdictional Scheme template instead and are disclosed also in the Income Statement.
Debt Raising Costs	Following the transfer of ownership of Ergon and Energex from the state to Energy Queensland Limited (EQL) on the 30 June 2016, transfers of debt for

Description	Reasons for material difference	
	both DNSPs were made in order to comply with the Government Owned Corporations Regulation 2016 (Regulation). As such, no debt raising costs were incurred by Ergon Energy during 2016-17 as no debt was raised or refinanced.	
Non-Network Alternatives	With lower customer demand, there was a reduced need for Non-Network Alternative solutions.	
Corporate Restructuring	Ergon Energy experienced significant organisational change during the year to transition workforce levels therefore a voluntary retrenchment program was offered, resulting in redundancies exceeding AER approved forecasts.	
Not Proceeding Network Initiated Capital Works	A number of network projects written off as considered no longer necessary.	

# 8. STPIS PERFORMANCE MEASURES – EXPLANATION FOR MATERIAL VARIANCES

#### 8.1 Requirement

Schedule 1 paragraph 1.7 of the Notice requires Ergon Energy to identify each difference (where the difference is equal to or greater than  $\pm$  10 per cent) between the target performance measure specified in the service target performance incentive scheme and actual performance reported in the response to paragraph 1.1(b) (being, information required in the Non-Financial Information Templates in the Microsoft Excel workbook attached at Appendix B).

Paragraph 1.8 then requires Ergon Energy to explain all Material differences between the target performance measure specified in the STPIS and actual performance reported in the response to paragraph 1.7.

The AER requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1, which includes both the Templates, Basis of Preparation as well as any attachments provided in response to requirements.

#### 8.2 Response

Of note, Ergon Energy's Telephone Answering actual performance for 2016-17 was within 10% of the target performance measure specified in STPIS. Reliability performance is discussed below.

#### 8.2.1 Reliability Parameters

Ergon Energy's reliability performance for 2016-17 was favourable to all 6 STPIS performance measures. The difference between the actual performance and the target was greater than 10 per cent for 5 of the 6 measures. Long Rural (LR) SAIFI category was the only measure that did not outperform STPIS targets by greater than 10 per cent for 2016-17.

Comparing the 2016-17 actual performance to the STPIS targets:

- Urban (UR) SAIDI and SAIFI outperformed the targets by 37% and 39% respectively;
- Short Rural (SR) SAIDI and SAIFI outperformed the targets by 33% and 25% respectively;
- Long Rural (LR) SAIDI and SAIFI outperformed the targets by 16% and 9% respectively.

Weather pattern variability continued to demonstrate a strong relationship to the reliability of supply outcomes for the Ergon Energy customers. The summer storm season was late and generally mild in 2016-17 by comparison to previous years. As a result of the mild weather the asset failure and weather related interruption events were considerably lower than the historical average, which led to all 3 feeder categories experiencing relatively favourable reliability of supply performance across October, November and December 2016. For the Urban and Short Rural categories the performance for the remainder of the year was comparable to previous years. The Long Rural category however was exposed to a series of storm events in the South West, Wide Bay and Capricornia regions throughout March which diminished the gains achieved in the earlier months of summer.

For the year, 6 Major Event Days (MEDs) were identified associated with severe weather events. Tropical Cyclone Debbie impacted the Northern and Mackay regions in late March 2017, before degrading to a significant rain depression which triggered flooding across the Capricornia region in early April. The

exclusion of the interruptions occurring on MEDs provided an effective mechanism to manage performance variability in the UR, SR and LR categories.

Achieving performance in the rural network segments that is consistently favourable to the STPIS targets is a challenge for Ergon Energy. The annual variability in supply interruptions occurring in the rural areas is influenced significantly by the severity of weather events and in general by longer term weather patterns. The duration of the supply interruption events in these areas is extended (by comparison to the urban areas) because of the vast geographical spread of assets serviced by the regional depots and the interruption exposure resulting from the predominantly radial arrangement of the supply chain in this network type.

#### 9. CLASSIFICATION OF DISTRIBUTION SERVICES

#### 9.1 Requirement

In respect of the classification of services, Schedule 1 paragraph 2.1 of the Notice requires Ergon Energy to explain the procedures and processes used by Ergon Energy to ensure that the distribution services have been classified as determined in the AER's 2015-20 Distribution Determination.

The AER requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1, which includes both the Templates, Basis of Preparation as well as any attachments provided in response to requirements.

#### 9.2 Response

In the majority of instances, the classification of Ergon Energy services happens automatically as customers and retailers generally select the service they require. A listing and description of Ergon Energy services by service order type (with the associated product codes and prices) is provided in the "Price List for ACS" which is published on Ergon Energy's website. The Price List is developed in accordance with the classification of services (CoS) and Ergon Energy's AER-approved Pricing Proposal.

Customers can make requests for services through their retailer, or they can contact Ergon Energy's National Contact Centre (NCC). The NCC has a range of scripts and an Online Help System which informs operators about what steps should be taken to correctly identify a service and process a customer's request. A schedule of rates is also readily accessible to operators to determine on what basis fees will apply for the customer's requested service (no charge, standard fee, customer-specific quote required etc.).

Retailers make requests for Ergon Energy services through market systems in accordance with the National B2B Procedures. The Market Interface Management Services team manages requests from retailers, and has well established procedures in place to ensure services are correctly identified and processed appropriately through market systems.

Specialist business units within Ergon Energy have also been established to handle more complex service requests, and calculate prices for services requiring quotations (for example – new connections to the network, supply enhancements, rearrangement of network assets, design and construction of connection assets and street lights etc.). These business units have a range of procedures, work instructions and reference materials to ensure the service is correctly classified and appropriately priced. For example, in the case of large customer connections, Ergon Energy's Major Customer Connection Group has a manual to assist them to determine the classification of assets, and which components of a project will be required to be funded under the SCS revenue cap, and which components will be funded through ACS charges levied on customers.

Staff requiring further guidance about a service classification, can request specialist regulatory advice from Energy Queensland's Regulatory & Pricing Group.

Customers and retailers also have avenues available to them to request a review of a service classification decision through Ergon Energy's Tariff Class Assignment and Re-assignment Procedures. These procedures are publicly available in Ergon Energy's Tariff Structure Statement.

#### 10. ARRANGEMENTS FOR NEGOTIATED SERVICES

#### 10.1 Requirement

Schedule 1 paragraph 2.2 of the Notice requires Ergon Energy to explain the procedures and processes used by Ergon Energy to ensure that the negotiated distribution service criteria, as set out in the AER's 2015-20 Distribution Determination, have been applied.

The AER requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1, which includes both the Templates, Basis of Preparation as well as any attachments provided in response to requirements.

#### 10.2 Response

Ergon Energy did not propose in its classification of services proposal that any of its Distribution Services be classified as Negotiated Distribution Services. As a result, Ergon Energy does not have a Negotiating Framework.

In accordance with the AER's final decision for Ergon Energy for the 2015-20 regulatory control period (29 October 2015), which accepted the list of services that Ergon Energy identified for each category of Distribution Services, Ergon Energy has no Negotiated Distribution Services.

#### 11. NEGATIVE CHANGE EVENTS

#### 11.1 Requirement

Schedule 1 paragraph 2.3 of the Notice requires Ergon Energy to discuss the process it has in place to identify negative change events under NER clause 6.6.1(f) and the threshold of materiality applied by Ergon Energy to these events.

The AER requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1, which includes both the Templates, Basis of Preparation as well as any attachments provided in response to requirements.

#### 11.2 Response

#### 11.2.1 Process for identifying Negative Change Events

Ergon Energy's process for identifying negative change events involves the following actions:

- Recognising the identification and reporting of negative change events as an additional regulatory obligation within the business. In particular, the Regulatory and Pricing Group's work plan has included this as an obligation;
- The identification and reporting of negative change events is coordinated by Energy Queensland's Regulatory and Pricing group. However other departments are involved as required;
- The relevant departments are responsible for reviewing relevant material, identification of possible negative change events, reporting of events to Regulatory and Pricing (as coordinator) and ensuring the timely and accurate documentation of the process;
- The relevant departments are to identify and record the documents/web sites and any other resources intended to be reviewed in the search for negative change events. For example, Queensland government media statements, Commonwealth government media statements, AER publications/statements, financial reporting documents (or other relevant documents providing updates to tax policy);
- A communication protocol is to be established between the relevant departments and the Regulatory and Pricing group and within the Regulatory Affairs department to ensure that the identification process is being actively conducted;
- The responsible person within Regulatory and Pricing is required to notify the Regulatory and Pricing General Manager immediately where a possible negative change event is identified by any department;
- The Regulatory and Pricing Manager is to confirm that the event meets the criteria of a negative change event;
- Once confirmed, Regulatory Affairs and Pricing is to be responsible for the determination of estimated costs associated with the event in conjunction with relevant internal departments;
- In doing so, it is important to consider the distinction between under-expenditure resulting from deliberate business decisions or forecasting error and that resulting from a negative change event. In particular, the distinction between controllable and uncontrollable costs is critical. By nature, a negative change event must be an exogenous event beyond the control of Ergon Energy. By definition, all

management decisions by Ergon Energy regarding the investment in and operation of its network that subsequently result in cost savings cannot be treated as a negative pass-through event; and

 Regulatory Affairs and Pricing is responsible for coordinating the preparation of pass-through applications and providing to the AER as per requirements.

#### 11.2.2 Materiality Threshold Applicable to Negative Pass through Events

The NER indicates that the AER will apply a materiality threshold to cost pass through events for a distribution determination where an event results in a change in costs exceeding 1% of the annual revenue requirement. Events include a regulatory change event, service standard event, tax change event, a retailer insolvency event and any other event specified in a distribution determination. Specified events for Ergon Energy include an insurance cap event, natural disaster event, and insurer's credit risk event.

#### 12. RING FENCING COMPLIANCE

#### 12.1 Requirement

Schedule 1 paragraph 2.4 of the Notice, requires Ergon Energy to discuss the process it has in place to monitor compliance with the *Queensland Competition Authority, Final Determination - Electricity Distribution:* Ring Fencing Guidelines, September 2000 (or any Ring fencing Guideline the AER may develop under clause 6.17.2 of the NER).

Ergon Energy is also required to list any instances of non-compliance, including the date of non-compliance event, reason for non-compliance, impact on customers, impact on competitors, and any remedial action taken in this regard.

The AER requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1, which includes both the Templates, Basis of Preparation as well as any attachments provided in response to requirements.

#### 12.2 Response

Per clause 6.6.2 (b) of the Australian Energy Regulator's (AER's) Ring-Fencing Guideline (Electricity Distribution), a DNSP is not required to submit an annual compliance report for its regulatory year in which this Guideline commences. This Guideline commenced on 1 December 2016 and, therefore, Ergon Energy is not required to submit an annual compliance report for the 2016-17 regulatory year. On 11 October 2017, the AER confirmed on this basis Ergon Energy was not required to submit an annual compliance report for the 2016-17 regulatory year.

#### 13. CHANGES IN TAX STANDARD ASSET LIVES

#### 13.1 Requirement

Schedule 1 paragraph 7 of the Notice, requires Ergon Energy to identify all tax standard asset lives applied to asset classes that differ from those contained in the AER approved PTRM for Ergon Energy's current regulatory control period. Explain the reasons for each difference identified including reasons for any departure from the ATO's most recent determination of effective life.

#### 13.2 Response

Ergon Energy has identified all tax standard asset lives applied to asset classes that differ from those contained in the AER approved PTRM for Ergon Energy's current regulatory control period and explained the reasons for these differences in EE1617AR TAX – Changes in Tax Standard Asset Lives.

### 14. GROUP CORPORATE AND ORGANISATIONAL STRUCTURES

#### 14.1 Requirement

Schedule 1, paragraph 8 of the Notice requires Ergon Energy to provide charts that set out the group corporate structure of which Ergon Energy is a part and the organisational structure for Ergon Energy.

The AER requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1.

#### 14.2 Response

Figure 1 illustrates Ergon Energy's Group Structure as at 29 June 2016 (as relevant to the 2016-17 regulatory year being reported on). For the 2016-17 year, the Ergon Energy Group comprised a series of companies involved in the purchase, distribution and sale of electricity in Queensland, both within and outside the NEM.

Figure 1: Ergon Energy Group Structure

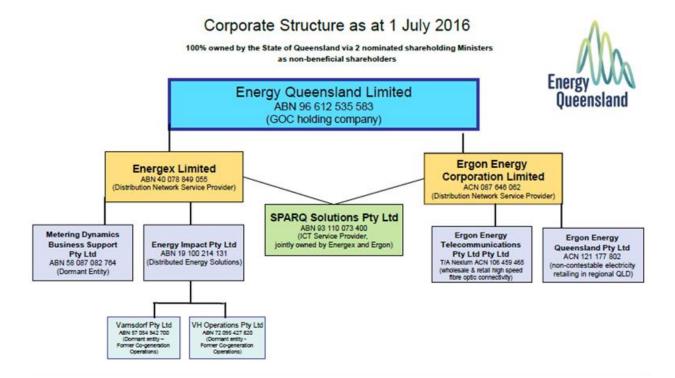
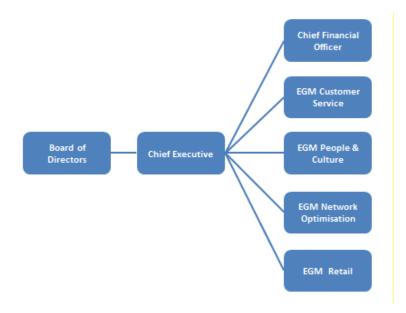


Figure 2 illustrates Ergon Energy's organisation structure. In particular, it shows the relationship between the Board of Directors, the Executive Management Team, and the various Business Units within Ergon Energy.

**Figure 2: Ergon Energy Organisational Chart** 



#### 15. AUDIT AND REVIEW REPORTS

#### 15.1 Requirement

Schedule 1 paragraph 9.1 of the Notice requires the provision of Audit Report(s) (for Financial Information) and Review Report(s) (for Non-Financial Information) in accordance with the requirements of the Notice, Audit and Review at Appendix D.

Ergon Energy is required to prepare these reports using a person(s) who satisfies the requirements of paragraph 2 of Appendix D, in accordance with the requirements of the Notice and the Audit and Review.

In addition Appendix D, paragraph 3 requires that Audit and reviews must be conducted in compliance with Australian Auditing and Assurance Standards, as developed by the Auditing and Assurance Standards Board.

The audit of Financial Information in Excel Workbooks must comply with the Auditing Standard ASA 805 Special Considerations – Audits of Single Financial Statements and Specific Elements, Accounts or items of a Financial Statement. The Audit Report must include an opinion as to whether or not the Financial Information provided is presented fairly in accordance with the requirements of the Notice including the principles and requirements in Appendix A.

The review of the Non-financial Information in Microsoft Workbook must comply with the ASAE 3000 Assurance engagements other than audits or reviews of historical financial information. The Review Report must include a conclusion as to whether or not anything has come to the Auditor's attention that causes it to believe that the Non-Financial Information is not, in all material respects, presented fairly in accordance with the requirements of the Notice including the principles and requirements in Appendix A.

When carrying out an audit or review as specified in Appendix D to the Notice, an auditor or assurance practitioner shall have reference to Ergon Energy's Basis of Preparation.

#### 15.2 Response

Ergon Energy notes the following auditors were appointed to audit its 2016-17 Annual Reporting RIN and associated templates (as appropriate):

- Auditor-General of Queensland to audit the Financial Information in accordance with the Audit scope at Appendix D paragraph 1.1(a) of the RIN, being
  - the Financial Information in the Excel worksheets 2.11, 4.1, 7.8, 7.10-7.13, 8.1-8.2, 8.4, 9.5, response to Schedule paragraph 1.1(a) (the *Financial Information Templates*) and (c) (the workbook or other information that reconciles and explains *Adjustments* between the *Audited Statutory Accounts* and the *Financial Information Templates*) except if this information is:
    - (i) Audited Statutory Accounts;
    - (ii) forecast information;
    - (iii) estimated information;
    - (iv) explanations relating to material differences;
- WSP to audit the Non-Financial information in accordance with the Audit scope at Appendix D paragraph
   1.1(b) of the RIN, being:

• the *Non-Financial Information* in the Excel worksheets 6.2 and 6.6-6.9 provided in response to Schedule paragraph 1.1(b) (*Non-Financial Information Templates*).

As required, Ergon Energy provides the following results of the abovementioned audits as attachments to this submission, namely the Audit Report(s) by Queensland Audit Office and WSP -:

- Audit Opinion (Financial Information Regulatory Accounting Statements ) Actual;
- Audit Report (Non-Financial Regulatory Templates) Actual, Estimates

Refer to: Table 7-1: List of Attachments.

#### 16. STATUTORY DECLARATION

#### 16.1 Requirement

The AER requires Ergon Energy to verify specified information, by way of a statutory declaration by an Officer of the Company in accordance with Appendix D to the Notice. A pro forma Statutory Declaration appropriate for Ergon Energy's jurisdiction was provided by the AER in this regard.

The RIN requires Ergon Energy to verify, by way of a statutory declaration the information provided in response to Schedule 1, which includes both the Templates, Basis of Preparation as well as any attachments provided in response to requirements.

#### 16.2 Response

Ergon Energy herein provides a Statutory Declaration signed by the Chief Executive of Ergon Energy Corporation Limited, as an attachment to this submission.

Refer to: Table 7-1: List of Attachments.

### 17. APPENDIX A - LIST OF ATTACHMENTS

**Table 17-1: List of Attachments** 

Title	Attachment	
EE1617AR CON	Ergon Energy 1617 Annual Reporting RIN Templates, Consolidated Information	
EE1617AR RECON	Reconciliation (Audited Statutory Accounts and Regulatory Accounting Statements)	
EE1617AR PPE	Capitalisation Policy: Property, plant and equipment	
EE1617AR IA	Capitalisation Policy: Intangible Assets	
EE1617AR CADB	Cost Allocation to Distribution Business	
EE1617AR CASS	Cost Allocation to Service Segments	
EE1617AR DMIA	Ergon Energy 1617 Demand Management Innovation Allowance (Annual Report)	
EE 1617 AR RSUP	Supplementary Schedule to Template 8.1 Income Statement	
EE1617AR TAX	Change in Tax Standard Asset Lives	
EE1617AR PB NF	WSP - Review Report (Non-Financial)	
EE1617AR QAO F	Queensland Audit Office - Audit Opinion (Financial)	
EE1617AR SDEC	Ergon Energy Corporation Limited, Statutory Declaration	

**Table 17-2: Basis of Preparation** 

	Template Name	BOP Attachment Name
2.1	Labour	EE1617AR T2.11 LBR
3.6	Quality of Service	EE1617AR T3.6 QOS
3.6.8	Network Feeders	EE1617AR T3.6.8 NWF
3.6.9	Network Reliability	EE1617AR T3.6.9 NWR
6.2	STPIS Reliability	EE1617AR T6.2 STPISR
6.6	STPIS Customer Service	EE1617AR T6.6 STPISCS
6.7	STPIS Daily Performance	EE1617AR T6.7 STPISDP
6.9	STPIS Guaranteed Service Levels	EE1617AR T6.9 STPISGSL
7.8	Avoided Transmission Use of System Payments	EE1617AR T7.8 AVTUOS
7.10	Jurisdictional Scheme	EE1617AR T7.10 JSCH
7.11	Demand Management Incentive Scheme / Allowance	EE1617AR T7.11 DMIS
7.13	Total Annual Retailer Charges	EE1617AR T7.13 TARC
8.1	Income	EE1617AR T8.1 INC
8.2	Capex	EE1617AR T8.2 CAPEX
8.4	Opex	EE1617AR T8.4 OPEX

#### **Faults Only**

13 22 96 24 hours a day, 7 days a week

#### **Life-Threatening Emergencies Only**

Triple zero (000) or 13 16 70 24 hours a day, 7 days a week

ERGON. ENERGY

**Ergon Energy Corporation Limited ABN 50 087 646 062**