

Observed RAB multiples generally provide no useful information on the reasonableness of the allowed rate of return

- What the AER can observe in practice:

$$\begin{aligned} RAB \text{ multiple} &= \frac{E[\text{Enterprise Value}]}{\text{Existing RAB}} \\ &= \frac{E[REV_{existing}] + E[REV_{future}] + E[OUT] + E[UNREG]}{\text{Existing RAB}} \end{aligned}$$

- Where:
 - Revenue allowances (i.e., return on and return of capital) related to the existing RAB ($REV_{existing}$);
 - Revenue allowances related to future investments in regulated assets (REV_{future});
 - Payoffs from outperformance of regulatory allowances (OUT), such as incentive payments; and
 - Net cash flows from unregulated activities ($UNREG$).

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- What the AER *actually* needs in order to provide a meaningful cross-check of its rate of return determinations:

$$RAB\ multiple = \frac{E \left[REV_{existing} \right]}{Existing\ RAB}$$

- The ratio above would be a fair test of the NPV = 0 condition and, therefore, a good cross-check on the AER's rate of return determinations.
- But, in practice, the AER can never observe this ratio. Nor can the AER calculate it.
- Using observed RAB multiples as a check on the sufficiency of the *"total compensation (inclusive of the rate of return) provided to investors"* (AER Final Omnibus Paper) is not a fair test of the NPV = 0 condition.
- So observed RAB multiples cannot be used practically as a meaningful cross-check.