



Contents

Australian Energy Regulator's Instructions	5
Structure of this document	5
3.6.6.1 Technical Quality of Supply	9
3.6.7.1 Timely Provision of Services	9
3.6.7.2 Timely Repair of Faulty Street Lights	10
3.6.7.3 Call Centre Performance	10
3.6.8 Network Feeder Reliability	11
3.6.9 Network Feeder Reliability – Planned Outages	13
4.1.4 Public Lighting Metrics by Tariff	16
6.2 Reliability and Customer Service Performance	18
6.6.1 Telephone Answering	21
6.6.2 Inadequately Served Customers	21
6.7.1 Daily Performance Data – Unplanned	24
6.8 STPIS Exclusions	26
7.8 Avoided TUOS Payments	31
7.10.1 Jurisdictional Scheme Payments	34
7.11 DMIA – Projects Submitted for Approval	37
8.1.1 Income Statement	47
8.2.1 – Capex by Purpose – Standard Control Services	56

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-
-
-
-
-
-
-
-
-
-
-
- 8.2.2 – Capex by Purpose – Material Difference Explanation 56
- 8.2.3 – Capex Other 56
- 8.2.4 – Capex by Asset Class 56
- 8.2.5 – Capital Contributions by Asset Class 56
- 8.2.6 – Disposals by Asset Class 56
- 8.4.1 Operating and maintenance expenditure by purpose 61
- 8.4.2 Operating and maintenance expenditure by purpose – margins only 61
- 8.4.3 Operating and maintenance expenditure – explanation of material difference 61

Purpose

The Annual Reporting Regulatory Information Notice (RIN) requires Endeavour Energy to prepare a Basis of Preparation for all historic information in the Regulatory Templates which are the worksheets contained within the Microsoft Excel workbooks at Appendix A of the RIN. By this, the AER mean that for every historic variable in the Templates, Endeavour Energy must explain the basis upon which we prepared information to populate the input cells. The Basis of Preparation must be a separate document (or documents) that Endeavour Energy submits with its completed Templates. The AER will publish Endeavour Energy's Basis of Preparation along with the Templates.

This document is Endeavour Energy's Basis of Preparation in relation to the historic information contained within the Regulatory Templates required to be submitted to the AER by 2 November 2020.

Australian Energy Regulator's Instructions

The AER requires the Basis of Preparation to follow a logical structure that enables auditors, assurance practitioners and the AER to clearly understand how Endeavour Energy has complied with the requirements of the RIN.

To do this, Endeavour Energy has structured its Basis of Preparation with a separate section to match each of the worksheets tabs where a Basis of Preparation is required.

The AER has set out what the minimum requirements for the Basis of Preparation are. This is detailed below:



1. Endeavour Energy must explain, for all information in the Information Templates, the basis upon which it prepared information. This is the Basis of Preparation;
2. The Basis of Preparation must be a separate document that Endeavour Energy submits with its completed Information Templates;
3. The Basis of Preparation must follow a logical structure that enables auditors, assurance practitioners and the AER to clearly understand how Endeavour Energy has complied with the requirements of this Notice; and
4. When carrying out an audit or review as specified in Appendix C, an auditor or assurance practitioner shall have reference to Endeavour Energy's Basis of Preparation.

Structure of this document

We outline our general approach to developing our response to the RIN. We identify key systems used to provide data, note issues relating to data quality, and make comments on the reliability of the data for economic benchmarking purposes.



• General approach

In this section, we identify our general approach to collecting and preparing information.

Systems used to provide data

Where methodologies or assumptions were required to complete the files other than the mere application of the AER approved CAM to the general purpose financial statements Endeavour Energy has included commentary by way of the “note” function within Microsoft Excel to provide guidance to the AER.

Below is a listing of Endeavour Energy’s systems that, to a greater or lesser extent, were directly related to or supported the development of the information contained in the RIN templates:

- Cognos – Business reporting system managing database information such as organisation policies and procedures;
- Ellipse – financial management system including: accounts payable; payroll; asset and equipment registers and financial reporting functions. The Ellipse system also caters for defect management (condition based) and also routine maintenance (planned). The equipment register is also linked to various other supporting systems such as field inspections and the Geographical Information System (GIS);
- TM1 – Endeavour Energy uses this OLAP tool for various purposes including budgeting and forecasting, monthly reporting and regulatory accounts allocations. It is a cube-based technology which allows rules to be created between cubes and within cubes;
- eFrams – Endeavour Energy uses this system in relation to IT Allocation Drivers. The system enables access to all telecommunication billing, inventory management/asset register and reporting;
- Remedy - Endeavour Energy uses this system in relation to IT Allocation Drivers. This is a BMC tool used by CGI for asset management, definitive software library, incident management and service request management;
- Autocad - Endeavour Energy uses this system in relation to Property Drivers. This is a program used for computer-aided design and drafting. The program is used to maintain Floor Plans which can be used to summarise occupancy by business unit;
- Banner – Endeavour Energy’s customer database and billing system;
- Figtree – Worker’s compensation claims management data base. This system is maintained separate (but linked at aggregate levels) to other systems to maintain confidentiality of data as required by legislation;
- Value Development Algorithm (VDA) – Endeavour Energy uses the Value Development Algorithm (VDA) for its high-level asset renewal expenditure modelling. The model is populated with specific asset data in order to produce the replacement capital forecast. Data for each asset is allocated into asset categories, which represent major components that make up the network such as poles, transformers, conductor, cable, switchgear etc. Each asset type is assigned an asset life and a replacement cost. The quantity of assets installed on the network each financial year is also entered, thus generating an age profile of the network assets;

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- **General approach**

- Visual Risk – Endeavour Energy uses this Treasury Management System for improving the productivity of its treasury operations. Visual Risk provides functions such as capturing a facility drawdown; valuing an FX option; and facilitating back office administration and financial reporting. Specifically, it was used to prepare the cost of funds schedule;
- System Fault Recording (SFR) – Endeavour Energy used this Oracle database system for all reliability reporting up until 2011-12. The data in this system is accessed using Cognos, with further analysis and processing of data being undertaken using Microsoft Office programs such as Access and Excel;
- SCADA - Endeavour Energy uses this system to monitor and control its network. Information from this system feeds into OMS (see below) to enable the calculation of reliability reporting information;
- Outage Management System - - Endeavour Energy uses this system to log outages and other events on its network. From 2012-13 onwards this system has been used as the source of data for all reliability reporting; and
- Contact Centre 6 – Endeavour Energy’s call centre uses this system to run reports on historical call volume according to skill set (Call Type). The system is also used to assign agents to specific call taking groups based on call type.

Data quality issues

In previous consultations on the RIN, we have raised significant concerns with providing data in the form required by the AER.

Approach to our obligations under the NEL

Our view of the NEL is that a DNSP is only obligated to provide information that is available, that is, data which has been historically collected in our systems. In cases, where that information cannot be provided in the form required by the AER from our systems, we would have a reasonable excuse under section 28(5) of the NEL not to comply with that element of the notice. We have strong doubts that a RIN can require a business to prepare information by way of estimate that cannot be reasonably derived from information currently held in its systems.

Our understanding of the term ‘prepare’ relates to a power the AER has to compel a DNSP to collect information in the form required by the AER for future periods (for example, by developing new systems) rather than to manipulate historical data in potentially inaccurate ways. We suggest that the AER should give more careful consideration to whether it has appropriately informed itself of the distinction under section 28D of the NEL between the ability of a RIN to require existing information to be provided and the ability to require information to be prepared, maintained and kept on a going forward basis.

Recognition by AER that ‘best estimates’ are not robust

The AER has acknowledged that if we are compelled to provide best estimates then there is potential for the data to lack robustness. Endeavour Energy will address the implications of using best estimates which are not robust in its Basis of Preparation to accompany the final Audited Information.



• 3.6 Quality of Services

3.6 Quality of Services

Methodology and assumptions

- Calls to fault line is a sum of monthly report figures of calls to the 131 003 number taken from MyNetFone PA reports;
- Calls answered in 30 seconds applies only to those calls where a customer elected to speak to a consultant after listening to the IVR message (including those instances where the IVR provided detailed information concerning their outage). This data was sourced from the Cisco reporting application;
- Average wait time before call answered applies only to those calls where a customer elected to speak to a consultant after listening to the IVR message (including those instances where the IVR provided detailed information concerning their outage). This data was sourced from the Verint application;
- Overload events was recorded from the Cisco application; and
- Percentage calls abandoned applies only to those calls where a customer elected to speak to a consultant after listening to the IVR message (including those instances where the IVR provided detailed information concerning their outage). This data was sourced from the Cisco reporting application. It is assumed that customers that don't elect to queue to speak with a consultant are satisfied with the level of outage information provided by the IVR.

Use of estimated information

There is no estimated data in this worksheet.

Reliability of information

All data comes directly from the reporting systems.

3.6.8 Network Feeder Reliability

Compliance with requirements of the notice

Reported SAIDI/SAIFI complies with the requirements of the RIN. The following aspects are noted:

- excluded incidents detailed in table 6.8 have been determined in accordance with the requirements of the STPIS (3.3);
- Major Event Days (MED's) have been determined in accordance with the requirements of the STPIS (3.3) – and as per Endeavour Energy distribution determination 2019 to 2024 – Service target performance incentive scheme April 2019;
- the determination allows for the alternative Box cox methodology. The process is described in WPB 1012 – Calculation of Major Event Day Threshold;
- outages affecting single premises – Single premise outages that occur as a result of a fault on Endeavour Energy's network are included in the reliability result;

3.6 Quality of Services

- subsequent interruptions caused by network switching during fault finding, in general switching operations associated with an unplanned incident may include subsequent interruptions to customers that are associated with fault finding. Current systems do not have any facility to identify these operations and therefore exclude them from reliability calculations. It should be noted that removing these operations from reliability calculations would result in an inaccurate record of actual customer experience; and
- unplanned interruptions are sustained interruptions greater than three minutes in accordance with the SAIDI definition in appendix A of the STPIS.
- Feeder Category information is determined at the start of the year as per the method required by the AER. During the year as new Feeders are created the Feeder Category is determined from comparing similar Feeders. Where Feeders have not been categorised during the year and appear in the data from the source systems they are defaulted to “Urban”, unless a similar Feeder can inform of the likely Feeder category. This includes Feeders that did not have interrupted customers but appear in the data as part of a consolidated interruption record.

Source of information

1. Base outage data (customers interrupted and CMI)

Data sourced from OMS. All records in this database were validated and checked in accordance with a Work Place Instruction WPT0001 (supersedes WPB1014).

Reporting tool – Cognos 10

2. Customer numbers for calculation of SAIDI and SAIFI

Customer numbers used to calculate SAIDI and SAIFI were average customer numbers for the relevant reporting period and were sourced from customer numbers in the OMS Archive database

Methodology and assumptions

Major Event Days (MED's) have been determined in accordance with the requirements of the STPIS (3.3) – and as per Endeavour Energy distribution determination 201924 – Service target performance incentive scheme April 2019.

Excluded interruptions – Excluded Trouble Orders are identified in the system with distinct Causes and other factors. This data is extracted through a database query/view based on a exclusions in accordance with STPIS 3.3a.

All the information provided represents actual information extracted from Endeavour Energy's reporting systems and reconciled to reported figures in previous audited RINs. As a result, the information contained is considered to be reliable cognisant of the comments made above.

Energy not supplied - Unplanned – OMS customer minutes off supply used to calculate unplanned energy not supplied in sheet 3.6.8

3.6 Quality of Services

- outages affecting single premises – Single premise outages that occur as a result of a fault on Endeavour Energy’s network are included in the reliability result;
- subsequent interruptions caused by network switching during fault finding, in general switching operations associated with an unplanned incident may include subsequent interruptions to customers that are associated with fault finding. Current systems do not have any facility to identify these operations and therefore exclude them from reliability calculations. It should be noted that removing these operations from reliability calculations would result in an inaccurate record of actual customer experience; and
- unplanned interruptions are sustained interruptions greater than three minutes in accordance with the SAIDI definition in appendix A of the STPIS.
 - Feeder Category information is determined at the start of the year as per the method required by the AER. During the year as new Feeders are created, the Feeder Category is determined from comparing similar Feeders. Where Feeders have not been categorised during the year and appear in the data from the source systems they are defaulted to “Urban” unless a similar Feeder can inform of the likely Feeder Category. This includes Feeders that did not have interrupted customers but appear in the data as part of a consolidated interruption record.

Source of information

1. Base outage data (customers interrupted and CMI).

Data sourced from SwitchIT database using Cognos 7 Report.

Reporting tool – Cognos 7

2. Customer numbers for calculation of SAIDI and SAIFI.

Customer numbers used to calculate SAIDI and SAIFI were average customer numbers for the relevant reporting period and were sourced from customer numbers in the OMS Archive database

Methodology and assumptions

Major Event Days (MED’s) have been determined in accordance with the requirements of the STPIS (3.3) – and as per Endeavour Energy distribution determination 2019-24 – Service target performance incentive scheme April 2019.

All the information provided represents actual information extracted from Endeavour Energy’s reporting systems and reconciled to reported figures in previous audited RINs. As a result, the information contained is considered to be reliable cognisant of the comments made above.



• 4.1 Public Lighting



: 6.2 Reliability & Customer : Service Performance

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- **6.2 Reliability & Customer Service Performance**

Excluded interruptions – Reporting tool Cognos 10 identifies excluded interruptions based on a cause that is assigned to each interruption in accordance with STPIS 3.3. All the information provided represents actual information extracted from Endeavour Energy’s reporting systems and reconciled to reported



6.6 STPIS Customer Service

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- **6.6 STPIS Customer Service**

Note: Some data on which Feeder the customer is situated on when the interruption occurred was not available. Best efforts were made to determine the normal feeder for the customer.

The data was then summated and aggregated with Feeder Category information. Feeder Category SAIDI and SAIFI was calculated and summated, and then the Top 5 Feeders determined for each.

Average and Highest customer data was determined along with the calculation of the Network SAIDI and SAIFI for all inadequately Served Customers.



: 6.7 STPIS Daily : Performance Data

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- **6.7 STPIS Daily**
- **Performance Data**

6.7.1 Daily Performance Data – Unplanned

Compliance with requirements of the notice

The data provided is compliant with the definitions and requirements of the notice.

Source of information

Information was sourced from the Cisco application.

Methodology and assumptions

- Calls received after removing excluded events. Excluded calls included calls to the IVR where customer did not elect to speak with a consultant as well as any calls where the customer abandoned the call within 30 seconds of queuing to speak with a consultant. There were six excluded days due to major events; and
- Calls answered in 30 seconds applies only to those calls where a customer elected to speak to a consultant after listening to the IVR message (including those instances where the IVR provided detailed information concerning their outage). This data was sourced from the Cisco reporting application. There were six excluded days due to major events.

Use of estimated information

There is no estimated data in this worksheet.

Reliability of information

All data comes directly from the reporting systems.



6.8 STPIS Exclusions

6.8 STPIS Exclusions

6.8 STPIS Exclusions

Compliance with requirements of the notice

Reported SAIDI/SAIFI complies with the requirements of the RIN. The following aspects are noted:

- excluded incidents detailed in table 6.8 have been determined in accordance with the requirements of the STPIS (3.3a);
- Major Event Days (MED's) have been determined in accordance with the requirements of the STPIS (3.3b) – and as per Endeavour Energy distribution determination 2019-24 – Service target performance incentive scheme April 2019;
- the determination allows for the alternative Box cox methodology. The process is described in WPB 1012 – Calculation of Major Event Day Threshold;
- outages affecting single premises – Single premise outages that occur as a result of a fault on Endeavour Energy's network are included in the reliability result;
- subsequent interruptions caused by network switching during fault finding, in general switching operations associated with an unplanned incident may include subsequent interruptions to customers that are associated with fault finding. Current systems do not have any facility to identify these operations and therefore exclude them from reliability calculations. It should be noted that removing these operations from reliability calculations would result in an inaccurate record of actual customer experience; and
- unplanned interruptions are sustained interruptions greater than three minutes in accordance with the SAIDI definition in appendix A of the STPIS.

Source of information

1. Base outage data (customers interrupted and CMI).

Data sourced from OMS. All records in this database were validated and checked in accordance with a Work Place Instruction WPT0001 (supersedes WPB1014).

Reporting tool – Cognos 10.

2. Customer numbers for calculation of SAIDI and SAIFI.

Customer numbers used to calculate SAIDI and SAIFI were average customer numbers for the relevant reporting period and were sourced from customer numbers in the OMS Archive database.

Methodology and assumptions

Major Event Days (MED's) have been determined in accordance with the requirements of the STPIS (3.3b) – and as per Endeavour Energy distribution determination 2019-24 – Service target performance incentive scheme April 2019.

Excluded interruptions – Excluded interruptions are based on a cause or factor that is assigned to each interruption in accordance with STPIS 3.3a.

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- **6.8 STPIS Exclusions**

All the information provided represents actual information extracted from Endeavour Energy's reporting systems and reconciled to reported figures in previous audited RINs. As a result, the information contained is considered to be reliable, cognisant of the comments made above.

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- **7.11 Demand Management**
- **Incentive Scheme**

Project scope includes:

- Identify the functional requirements of the BESS for connection and operation on Endeavour Energy's network;
- Procure a grid connected BESS with a minimum of 1MWh storage capacity, and 500kVA inverter, with a modular and transportable design;
- Deploy BESS onsite at West Dapto;
- Prove the BESS can provide 1MWh at a peak of 500kVA as required for peak shaving;
- Confirm round trip charge/discharge energy efficiency of 80%;
- Understanding the SCADA control and protection requirements for the grid connected BESS; and
- Test the voltage, power quality, power factor management and reliability support functions of the BESS.

Aims and expectations of the trial include:

- Determine the suitability for peak demand reduction and other network support applications such as voltage, power quality and power factor management;
- Test the use of battery storage as grid backup supply for reliability support;
- Gain an understanding of design considerations such as component losses, charge/discharge rates, system lifecycle, safety, installation, control and monitoring requirements, and any limitations of the equipment;
- Confirm the viability of a relocatable storage solution, in terms of cost and ease of relocation;
- Practicalities of installation, testing and commissioning;
- Check the maturity of the technology and suppliers in the Australian market;
- Understand the cost to procure a grid connected BESS; and
- Viability of intended primary application of the battery storage, that is, as a tool to assist in deferral of zone substation construction.

Battery storage is approaching a price point that makes this technology a contender as an alternative network investment option. BESS have the potential to provide NPV positive returns when used for ZS construction deferral and will also provide a potential opportunity return, as the substations may be amalgamated, relocated or further deferred if load growth does not meet forecast levels.

It is in Endeavour Energy's interest to pilot grid connected storage to position the company to realise the benefits battery storage can provide such as peak shaving, reliability support, quality of supply improvement, and better understand the operational impacts of their application to our network.

West Dapto ZS, planned for construction in 2022, has been identified as a suitable location for the pilot. Pending successful testing of the BESS' peak lopping capability, the solution will remain onsite to alleviate demand growth in the West Lakes Illawarra development area and assist to defer West Dapto ZS construction.

- Develop a functional specification documenting the requirements of the BESS for connection and operation on Endeavour Energy's network;
- Tender for a grid connected BESS with a minimum of 1MWh storage capacity, and 500kVA inverter, with a modular and transportable design;

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- **7.11 Demand Management**
- **Incentive Scheme**

Statement

Endeavour Energy confirms the funding of the projects contained in this report are not:

- a. recoverable under any other jurisdictional incentive scheme;
- b. recoverable under any other state or Commonwealth government scheme; and
- c. included in the forecast CAPEX or OPEX approved in the AER's distribution determination for the next regulatory control period, or under any other incentive scheme in that determination (such as the D-factor scheme for NSW).



8.1 Income

8.1 Income

Operating Expenditure

Operating Expenditure (Opex) was extracted from the relevant TM1 cube based on mappings in accordance with the Annual RIN Instructions and Definitions, and the Cost Allocation Methodology (CAM). Data was reconciled to Opex reported in the Management and Statutory results. Certain additional steps are performed as part of the Annual RIN process in order to calculate the required information;

1. Extract operating expenditure data from the relevant TM1 cube at the account code level. Extract the data as labour and non-labour line items.
2. Reconcile the total derived at the individual account code level to the total from the TM1 cube ("N Level" Org Units in TM1) to ensure no account codes have been excluded.
3. Reconcile the total derived at the individual account code level to the total operating expenditure reported in the management and statutory results.
4. Assign a regulatory accounts classification to the extracted TM1 data. This classification can be a direct network cost, direct network overhead or a corporate overhead cost. A direct network cost is assigned directly to a RIN category (e.g. maintenance & repair, emergency response etc). Direct network overheads are the remaining network operating costs that cannot be allocated directly to a RIN category and are allocated on a pro rata basis based on the proportions of the direct allocation.
5. Populate table 8.1.1.2 Expenditure with the results of the above steps in accordance with the RIN instructions & definitions.

Note: given the relevant TM1 cube data is available and based on actual operating expenditure results for the year and the approved CAM, all information provided for this table consists of actual information (no estimated information required).

Methodology and assumptions

Table	Methodology	Assumptions
8.1.1.1 Distribution Revenue	Distribution ("DUoS") revenue data was extracted from the relevant TM1 cube based on mappings in accordance with the Annual RIN Instructions and Definitions. DUoS is allocated as 100% Standard Control.	No assumptions required.
8.1.1.1 Cross Boundary Revenue	Endeavour Energy does not have any Cross-Boundary Revenue – not applicable.	No assumptions required.

8.1 Income

8.1.1.2 Maintenance Expenditure	<p>Maintenance Expenditure is extracted from the relevant TM1 cube based on mappings in accordance with the Annual RIN Instructions and Definitions.</p> <p>Maintenance Expenditure was “reconciled in total” to Total Opex reported in the Management and Statutory results.</p>	<p>No assumptions required.</p>
8.1.1.2 Other Operating Expenditure	<p>Other Operating Expenditure excluding Maintenance Expenditure is extracted from the relevant TM1 cube based on mappings in accordance with the Annual RIN Instructions and Definitions. Other Operating Expenditure is adjusted for Group Management Fee Income recovery revenues. Other Operating Expenditure excluding Maintenance Expenditure was “reconciled in total” to Total Opex reported in the Management and Statutory results.</p> <p>Group Management Fee Income recovery is allocated based on an Excel work paper, using the Opex for the Group cost centres as the basis for the regulatory split). The resulting adjustments are used to “gross up” revenue since the recoveries are mapped to Opex for management reporting but to Other Revenue in the Annual RIN Income Statement.</p>	<p>No assumptions required.</p>
8.1.1.2 Other	<p>Other Expenditure is extracted from the relevant TM1 cube based on mappings in accordance with the Annual RIN Instructions and Definitions. Other Expenditure was “reconciled in total” to Total Opex reported in the Management and Statutory results.</p>	<p>No assumptions required.</p>
8.1.1.3 Income Tax Expense (/benefit)	<p>Income Tax Expense (/benefit) is extracted from the relevant TM1 cube based on mappings in accordance with the Annual RIN Instructions and Definitions. Income Tax is pro-rated across the various regulatory segments based on their respective proportions of “Profit Before Tax”. Income Tax Expense (/benefit) was “reconciled in total” to Income Tax Expense/(Benefit) reported in the Management and Statutory results.</p>	<p>No assumptions required.</p>

Use of estimated information

Endeavour Energy has not used estimated information in determining a profit and loss split of Standard Control Services, Alternate Control Services and Unregulated Services for the period.

Material accounting policy changes

Endeavour Energy has not undertaken any material change in accounting policies which would impact data contained in Table 8.1.1 – Income Statement.



• 8.2 Capital Expenditure

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- **8.2 Capital Expenditure**

8.2.1 – Capex by Purpose – Standard Control Services

8.2.2 – Capex by Purpose – Material Difference Explanation

8.2.3 – Capex Other

8.2.4 – Capex by Asset Class

8.2.5 – Capital Contributions by Asset Class

8.2.6 – Disposals by Asset Class

8.2.7 – Expensing Capex

Compliance with requirements of the notice

The data presented in tables 8.2.1, 8.2.2, 8.2.3, 8.2.4, 8.2.5, 8.2.6 and 8.2.7 is consistent with the requirements of the Annual RIN. In particular:

- Only costs allocated to the provision of standard control services are reported in tables 8.2.1, 8.2.2 and 8.2.4 and costs allocated to the provision of alternate control services are reported in table 8.2.3.
- The categories listed in table 8.2.1 align to the categories in the AER's 2020-24 Distribution Determination.
- The asset classes in table 8.2.4 align with the asset classes set out in Endeavour Energy's PTRM and RFM issued with the AER's 2020-24 Distribution Determination.

Source of information

- CPI adjusted forecasts were sourced from in Endeavour Energy's 2020-24 final determination folder on the AER website.
- Actual capital expenditure by purpose was sourced from Category Analysis RIN tables 2.1 – Expenditure Summary, 2.2 – Repex, 2.3 – Augex, 2.5 – Connections, 2.6 – Non-Network and 2.10 – Overheads.
- Work order and Project level data extracted directly from a MS Access query against the SQL server database which is extracted nightly from Ellipse. The specific query is run on parameters specified to extract the data (re: non-system CAPEX for activity "92" and "94").
- Work order and Project level report (SAMP CAPEX report) received from Commercial Finance (re: system CAPEX for activity "91").
- Asset classes assigned to work orders were sourced from TM1.
- Expensed capex data was obtained from additions labelled as MS within the Tax Fixed Assets register.

8.2 Capital Expenditure

Methodology and assumptions

The following tables set out the methodology applied to obtain the required data for tables 8.2.1, 8.2.2, 8.2.3, 8.2.4, 8.2.5, 8.2.6 and 8.2.7:

Table	Methodology	Assumptions
8.2.1 – Capex by Purpose – Standard Control Services	<ol style="list-style-type: none"> 1. CPI adjusted forecast was sourced from Endeavour Energy's 2020-24 final determination on the AER website. 2. This forecast was then updated into nominal (19/20 dollars) using updated actual CPI escalation factors. 3. Actual expenditure was sourced from category RIN tables 2.1 – Expenditure Summary, 2.2 – Repex, 2.3 – Augex, 2.5 – Connections, 2.6 – Non-Network and 2.10 – Overheads. 4. The split of actual expenditure by voltage level was done with input from the capacity planning manager. 	<p>Variations exist between the Annual RIN and Category Analysis RIN due to the passage of time and the order of operations was changed.</p> <p>Variance exist between the Annual RIN and Category Analysis RIN as a consequence.</p>
8.2.2 – Capex by Purpose – Material Difference Explanation	<ol style="list-style-type: none"> 1. System capex commentary was based on a comparison of the final AER determination vs actuals by project. 2. Non-system capex commentary was based on a comparison of the final AER determination vs actuals by activity (92) and sub activity (WC, WE, WF, WG and WH) and activity (94). 	None.
8.2.3 – Capex Other	<ol style="list-style-type: none"> 1. Actual expenditure was sourced from category RIN table 2.1 – Expenditure Summary. 	None.
8.2.4 – Capex by Asset Class	<p>System Capex</p> <ol style="list-style-type: none"> 1. Extract all system capital work orders (activity 91) that incurred expenditure for the year from SAMP Capex Report with source data from Ellipse via a MS access query. 2. Use TM1 formula to extract the asset classes assigned to each of these work orders. 3. Review the list of work orders with asset classes assigned and update any errors with the correct asset. 	None.



8.4 Operating Expenditure



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