

Appendix 11.3

Table of reasons for changes to
Access Arrangement

Access arrangement information

ACT and Queanbeyan-Palerang gas
network 2021–26

Submission to the Australian Energy Regulator
June 2020

Abbreviations

AA	Access Arrangement
AER	Australian Energy Regulator
CESS	Capital Expenditure Sharing Scheme
NGL	National Gas Law
NGR	National Gas Rules
RSA	Reference Service Agreement
UAG	Unaccounted for Gas
WACC	Weighted Average Cost of Capital

Explanation of proposed revisions to the 2016-2021 access arrangement

Evoenergy is proposing a number of changes to our current (2016-21) access arrangement in our access arrangement proposal for the 2021-26 period. The key changes are outlined in the table below. In summary, they include:

- changes to more closely align the drafting of the access arrangement with the Rules and to reflect amendments to the Rules, including those requiring the rate of return to be calculated in the manner stated in the applicable rate of return instrument;
- changes to introduce a capital expenditure sharing scheme (CESS).
- changes to more closely align the approach in Evoenergy's access arrangement with other AER regulatory decisions and approaches, including changes to align the operating expenditure incentive mechanism with the AER's efficiency benefit sharing scheme for electricity network service providers and to provide for intra-year reference tariff variations;
- changes to consolidate the provisions across the 2021-26 access arrangement and Reference Service Agreement (RSA) and to otherwise simplify the access arrangement.

Mechanical drafting changes are not addressed in Table 1.

Table 1 Proposed revisions to the 2016-2021 access arrangement

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
General			Amended "ActewAGL" to: <ul style="list-style-type: none"> ▪ "Evoenergy" in section 1 to reflect the change in trading name and updated the corresponding definition in Schedule 1; and ▪ to "Service Provider" throughout the remainder of the AA (for reasons discussed in "Cost Pass Through Events" below).
Introduction			
Access arrangement	Clauses 1.1 and 1.2	Clauses 1.1 and 1.2	Made minor edits to clarify the description of the Access Arrangement document and to update the contact details.
Evoenergy's network	Clauses 1.3 and 1.4	Clauses 1.3 and 1.4 and Schedule 10	Minor amendments to update and set out further details in relation to the Network: <ul style="list-style-type: none"> ▪ Added references to the Receipt Points set out in Schedule 8. ▪ Added map of the Network as new Schedule 10, included a reference to Schedule 10 in clause 1.4 and updated details of the Evoenergy website.
Other	Clauses 1.8–1.9	Clauses 1.8–1.9	Updated the commencement of the AA, review submission and review commencement dates.
Definitions and interpretation	Clauses 1.10–1.11	Clauses 1.10–1.11	<ul style="list-style-type: none"> ▪ Deleted the reference to "Applicable Laws" as this is not necessary. ▪ Minor amendments to clarify the definitions and interpretation provisions.
Services Policy			
Services	Clauses 2.1–2.4	Clauses 2.1–2.4	<ul style="list-style-type: none"> ▪ Amended the name of the reference service from "Haulage Reference Service" to "Reference Service" to reflect that Evoenergy only offers a single reference service (and made a consequential change to the definition of "Haulage Reference Tariff"). ▪ Minor amendment to change the defined term "Services" to "Pipeline Services" to reflect the language of the NGL and NGR.

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
			<ul style="list-style-type: none"> Capitalised the term “Delivery Point”, which is defined in Schedule 1 (applicable to the Reference Service and its use in relation to the “Interconnection Service”, see “Non-Reference Services” below).
Terms and conditions of the reference service	Clauses 2.5–2.6	Clause 2.5	Deleted clause 2.6, which simply reflects the position under the NGR.
Non-reference service	Clause 2.7	Clause 2.6	<ul style="list-style-type: none"> Corrected the reference to “Interconnection of Embedded Network Service” to an “Interconnection Service” in line with the change discussed in “Interconnection Service” below. Corrected the reference to “Negotiated Services” to the singular.
Interconnection service	Clause 2.8	Clause 2.7	<ul style="list-style-type: none"> Redefined the “Interconnection of Embedded Network Service” to an “Interconnection Service” and made amendments to reflect that the Interconnection Service is provided for the establishment of: <ul style="list-style-type: none"> a Delivery point to enable delivery of gas from the Network to a “Downstream Network”; or a Receipt Point to enable delivery of gas into the Network from an “Upstream Facility” such as a pipeline or gas production. Added definitions of “Upstream Facility” and “Downstream Network” to Schedule 1. Replaced the definitions of “Embedded Network” and “Embedded Network Operator” with “Downstream Network” to avoid the potential for confusion with connections of embedded network providers (e.g. for high-rise buildings and shopping centres) which are covered by the connection procedures under chapter 12A of the NGR. Replaced the reference to Schedule 6 with a reference to the Operational Schedule (Schedule 7) in light of the amendments to those Schedules discussed below.
Negotiated services	Clauses 2.8 and 2.9	Clause 2.8	<ul style="list-style-type: none"> Corrected the references to “Negotiated Services” to the singular. Simplified drafting by using defined term of “Service Agreement” rather than the separate defined term “Negotiated Service Agreement” (which falls within the definition of “Service Agreement”). Deleted previous clause 2.9, which simply reflects the position under the NGL.

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
Requests for Services	Clause 2.11	Clause 2.10	Clarified the drafting given proposed amendments to (proposed) section 13 (Queuing) (for the reasons set out in "Queuing" below).
Capital Expenditure			
Review of capital base after expiry of an access arrangement, asset register, database of capital contributions	Clauses 4.2 and 4.3-4.5	N/A	Deleted previous clauses 4.2 and 4.4-4.5 on the basis these clauses are unnecessary. Provisions of this kind were specifically required in decisions by prior regulators and are legacy provisions. The roll forward of the capital base will occur in accordance with the NGR (with the basis of depreciation specifically addressed in the AA, as required by the NGR).
Operating Expenditure Efficiency Carryover Mechanism			
Application of formulae	Section 3	Section 3	<ul style="list-style-type: none"> ▪ Simplified drafting of clause 3.1(a) and included a statement clarifying that the efficiency gain (or loss) can be carried forward into the 2026 AA period until it has been retained by Evoenergy for a period of five years. ▪ Amended the operating expenditure incentive mechanism to align with the AER's Efficiency Benefit Sharing Scheme for Electricity Network Service Providers, November 2013. The incentive mechanism is consistent with the mechanism proposed by JGN. ▪ Deleted previous clause 3.7(a) to ensure consistent treatment of expenditure across the operating and capital expenditure incentive mechanisms. The clause dealt with changes to the classification of costs as either capital or operating expenditure during the AA period. ▪ Deleted unused sub-clauses in previous clause 3.7 and consequential amendments. ▪ Amended defined terms in previous clause 3.7(c) for consistency with other provisions of the AA. <p>Further explanation of the incentive mechanism changes is set out in Attachment 9 of the AA Proposal.</p>

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
Capital Expenditure Incentive Mechanism			
Capital expenditure incentive mechanism	N/A	Section 4	<ul style="list-style-type: none"> ▪ Added new section to provide for Evoenergy's proposed capital expenditure incentive mechanism (referred to as the CESS). The proposed CESS is similar to the mechanism as applies to the Victorian gas distribution businesses and the AER's Capital Expenditure Incentive Guideline for Electricity Network Service Providers, November 2013, and has been proposed by JGN, with a "Contingent Payment Index" more appropriate for Evoenergy's circumstances. The proposed CESS is further described in Attachment 9 of the AA Proposal. ▪ Added new definitions of "CESS", "Contingent Payment Factor", "Contingent Payment Index", "SAIDI" and "SAIFI" used in the new section in Schedule 1. ▪ Added new Schedule 9 (CESS Contingent Payment Index) to support this new section (discussed below).
Fixed Principles			
National Gas Rules	Section 5	Section 6	<ul style="list-style-type: none"> ▪ Added a fixed principle for the automatic adjustment factor true-up for the final two years of the 2021 access arrangement period to be made in the 2026 access arrangement period. ▪ Added fixed principles for the operating and capital expenditure incentive mechanisms. This is to ensure the effectiveness of the mechanisms by binding the AER and Evoenergy in the future regulatory periods in which the incentive mechanism is intended to have a revenue impact.
Return on Debt			
Return on debt formula	Section 6	Section 7	<ul style="list-style-type: none"> ▪ Amended this section to: <ul style="list-style-type: none"> - update the trailing average formula for calculating the return on debt; - delete the provisions relating to the calculation of the annual return on debt observation to refer to the AER's Rate of Return Instrument;

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
			<ul style="list-style-type: none"> - remove hard-coded cell references to the Evoenergy's final decision PTRM for the return on debt estimates and other minor changes to simplify and clarify the drafting; and - clarified that the AER will provide Evoenergy with an updated PTRM in notifying it of the updated return on debt and X factor. <ul style="list-style-type: none"> ▪ Added in Schedule 1 the defined term "Rate of Return Instrument" used in the amended section. ▪ Deleted defined terms no longer used in the AA from Schedule 1, including "Averaging Period Notice", "Best Fit Independent Data Source" and "Independent Data Source". <p>Further detail about Evoenergy's rate of return proposal is set out in Attachment 5.</p>
Initial Reference Tariffs and Variations to Reference Tariffs			
Headings	Section 7	Section 8	Amended the headings to section 8 and clauses 8.1 and 8.2 to reflect that Initial Reference Tariffs are addressed in the section (and not just variations to those Reference Tariffs).
Annual reference tariff variation mechanism	Clause 7.4	Clause 8.4	Provided for the AER and Evoenergy to agree on an alternative CPI measure in the event the Australian Bureau of Statistics ceases to calculate and publish the CPI.
Intra-year reference tariff variation mechanism	Clause 7.5	Clause 8.5	<ul style="list-style-type: none"> ▪ Added a new clause to allow for intra-year Reference Tariff variation with the approval of the AER. This would enable Evoenergy to respond to significant events with price impacts through the course of a Financial Year, consistent with the timing of when costs are incurred. Whereas in the 2016 access arrangement period, Evoenergy (then ActewAGL) implemented significant changes to the tariff structure, the applicable tariff structure is unchanged for the vast majority of customers in the 2021 access arrangement period (see "Schedule 3" below). Customers have adjusted to the new tariff structure and there is adequate stability to now allow such a mechanism. Evoenergy is proposing no significant tariff structure changes and therefore considers that customers should be able to respond to any intra-year price changes where these occur. ▪ Further explanation of the intra-year reference tariff variation mechanism is included in Attachment 10.

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
Cost pass through events	Clause 7.6	Clause 8.6	<ul style="list-style-type: none"> ▪ Amended the Natural Disaster Event to clarify that it includes any epidemic. ▪ Amended the Regulatory Change Event definition to clarify that it may be triggered by the introduction of a new obligation, as well as a change to an existing obligation. ▪ Deleted the requirement in the Regulatory Change Event and Service Standard Event definitions that costs be 'materially' increased or decreased. This requirement is duplicative and unnecessary given all Cost Pass Through Events must give rise to an "Administrative Cost Impact" before costs can be passed through (see clause 8.7, previously clause 7.7) and the definition of "Administrative Cost Impact" requires that the Event give rise to a change in cost in any relevant Financial Year that is equal to or greater than 1 per cent of the smoothed forecast revenue for that Financial Year (i.e. there is already a requirement that costs be material before they can be passed through). ▪ Amended the Service Standard Event definition to provide that the cessation of the current waiver of Evoenergy's obligations under clause 3.1 of the AER's Ring-fencing Guideline of October 2017 constitutes a Service Standard Event. The waiver expires on 1 July 2024. In the event a further waiver is not granted, as Evoenergy provides electricity distribution services, it could not continue to provide Pipeline Services and another legal entity would be required to do so. This would entail the service provider incurring higher costs in providing the Reference Service than if Evoenergy continued to provide the services in conjunction with providing electricity distribution services. ▪ Added a new definition of "Ring-fencing Guideline" used in the amended "Service Standard Event" definition. ▪ Added a new definition of "Service Provider" (which will at commencement be Evoenergy) and used this in place of "ActewAGL" as appropriate throughout the AA. This will ensure the AA remains workable in the event the current waiver of Evoenergy's obligations under clause 3.1 of the AER's Ring-fencing Guideline is not renewed and another legal entity is granted the right to provide Pipeline Services. ▪ Removed the Network User Failure Event. This event is no longer required because in February 2017, the Australian Energy Market Commission approved a rule change which enhanced the operation of the retailer insolvency cost pass through provisions in the NGR to enable distributors to collect unpaid network charges and any costs associated with a retailer default, regardless of the size of the retailer default. <p>Further detail on the proposed Cost Pass Through Events is provided in Attachment 10.</p>

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
Application process for seeking a cost pass through	Clauses 7.7–7.15	Clauses 8.7–8.15	<ul style="list-style-type: none"> Corrected minor grammatical errors throughout (including to correct the references to 'Change in Costs'). Amended the obligation in clause 8.8 (previously clause 7.8) to notify the AER of a Cost Pass Through Event which has or is likely to have an Administrative Cost Impact so that it is triggered upon that Event occurring (and not before). This is consistent with the approach in other regulatory determinations by the AER. Amended the obligation in clause 8.8 (previously clause 7.8) to notify the AER of a Cost Pass Through Event within 90 Business Days so that it is the later of the date on which Evoenergy becomes aware of the Cost Pass Through Event occurring and the date on which Evoenergy becomes aware that the Event will or is likely to have an Administrative Cost Impact. This is because the obligation should not be triggered before it is apparent that an Administrative Cost Impact associated with a Cost Pass Through Event is likely. Clarified in clauses 8.9 and 8.10 (previously clauses 7.9 and 7.10) that the cost information to be notified by Evoenergy to the AER is the Change in Cost for each relevant Financial Year. Clarified the drafting in clause 8.14(a) (previously clause 7.14(a)) to reflect that, in the event no determination is made, the AER is taken to have determined that the amount to be passed through is the sum of the Changes in Cost associated with the Cost Pass Through Event given to the AER by Evoenergy.
Inter-period treatment of cost pass through events and automatic adjustment factor costs	Clauses 7.16–7.17	Clauses 8.16–8.18	<ul style="list-style-type: none"> Simplified drafting by using defined terms and made minor grammatical corrections. Deleted reference to the automatic adjustment factor in clause 8.16 as cost pass through amounts are not included in the automatic adjustment factor (it is a separate factor in the Reference Tariff variation mechanism). Added new clause 8.18 to clarify that automatic adjustment factor amounts that incurred in prior access arrangement periods that are not passed through in Reference Tariffs in those periods may be passed through in the subsequent access arrangement period.
Annual variation notice	Clause 7.18	Clause 8.19(f)	Added subparagraph to reflect the inter-period treatment of cost pass through events already provided for in clause 8.16 (previously 7.16).

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
Intra-year variation notice	Clause 7.19	Clause 8.20	Added process for Evoenergy to submit intra-year Variation Notices that mirror the process for annual Variation Notices (the reasons for the intra-year mechanism are discussed in “Intra-year Reference Tariff Variation Mechanism” above).
Tariff Categories for Reference Services			
Tariff category assignment	Section 8	Section 9	<ul style="list-style-type: none"> ▪ Inserted introductory clause 9.1 to clarify that this section applies to all Delivery Points that receive the Reference Service and added defined term “Tariff Assignment Criteria” to simplify the drafting in this section. ▪ Simplified the drafting in clause 9.3. ▪ In clause 9.7(a), included defined terms “Customer” and “End Consumer”. The definition of “End Consumer” is included by reference to the RSA in Schedule 1. ▪ Amended clause 9.8 to simplify drafting.
Extensions and Expansions Policy			
Extensions and expansions	Section 9	Section 10	<ul style="list-style-type: none"> ▪ Relocated application provision (from previous clause 9.5) to the beginning of the section. ▪ Amended drafting to improve readability, provide greater clarity and align with Rule 104. ▪ Added and amended subheadings to improve readability.
Capacity Trading			
Capacity trading	Section 10	Section 11	Included additional drafting to reflect that currently the RSA does not provide for contracted capacity. If it were to be provided, then Evoenergy would perform its obligations to the User in accordance with the capacity trading requirements in the NGR and any applicable market procedures consistent with rule 105 of the NGR.

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
Changing Receipt and Delivery Points			
Changing receipt and delivery points	Section 11	Section 12	Minor changes for consistency with defined terms.
Queuing			
Queuing	Section 12	Section 13	<ul style="list-style-type: none"> ▪ Replaced provisions of the section with a reference to rule 103 of the NGR. The queuing policy in the 2016-21 AA reflects drafting that was approved by the Independent Competition and Regulatory Commission (ICRC) in 2004 (under the superseded Gas Code). The AER has not given notice under rule 103 of the NGR that Evoenergy's AA must include a queuing requirement and thus the pre-existing policy has been removed. ▪ Removed defined terms "Priority Date" and "Developable Capacity" removed from Schedule 1 as they are not otherwise used in the AA.
Definitions			
Definitions	Schedule 1		<p>In addition to other definition changes explained above, Schedule 1 has been updated as follows:</p> <ul style="list-style-type: none"> ▪ added definitions of "2020-21 Tariff Variation Notice" and "2022-23 Tariff Variation Notice" to support the amendments to the licence fee factor amount (see "Factor amounts" below); ▪ minor amendment to clarify the definition of "AER's Final Decision"; ▪ added the definition of "Gas" (consistent with the definition in the RSA) and used the defined term as relevant throughout the Access Arrangement; ▪ deleted the references to specific legislation and instruments set out in the definition on the basis they are captured by the general definition; ▪ corrected the definition of "National Energy Retail Law" to refer to the relevant application Acts; ▪ refined the definition of "Network" so that it is not by reference to Evoenergy's ownership of the network;

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
			<ul style="list-style-type: none"> defined “UAG Cost” (used in the calculation of the UAG factor amount in Schedule 4). The definition is drafted so as to allow for the possibility that unaccounted for gas may, in the future, be replenished by means other than purchasing gas via the market; shortened the defined term to “Utilities (Network Facilities) Tax” to “UNFT” for simplicity; harmonised definitions such as “End Consumer” and “Energy” with the RSA; defined “Load”, “Reference Tariff”, “Tariff Assignment Criteria” and “WACC”, including by reference to the RSA where appropriate and set out a number of definitions instead of cross referring to the RSA to improve readability of the AA; and removed unused definitions.
Requests for Service Procedures			
Request for service procedures	Schedule 2	Schedule 2	<ul style="list-style-type: none"> Amended clause 1 to provide that the procedures set out apply to a User or Prospective User seeking access to the Reference Service, to vary the MDQ or MHQ applicable to a Delivery Point under the RSA or add a new Delivery Point to the RSA. Amended drafting to update and provide more detail in respect of the process for requests for the Reference Service. Expanded process for requests for service to cover requests for a Non-Reference Service. Included legal status and creditworthiness requirements for new requests for the Reference Service and Non-Reference Services.
Initial Reference Tariff Schedule			
Introduction	Schedule 3, part 1	Schedule 3, part 1	Minor updates for consistency in the use of defined terms and to improve readability. An explanation of the key changes to this Schedule is set out in Attachment 10.
Tariff assignment criteria and Initial tariff categories and tariff charge components	Schedule 3, part 2 – 3	Schedule 3, part 2 – 3	<p>Key changes include:</p> <ul style="list-style-type: none"> Simplified tariff category assignment by removing the concept of customer groups, referring instead only to tariff classes.

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
			<ul style="list-style-type: none"> Simplified the tariff categories by abolishing VRH, VBS, VBM and VRG volume tariff categories and DBG demand tariff category. The take up of these tariff categories has been low and it is therefore proposed that they be abolished to avoid unnecessary administrative costs. This leaves two demand tariff categories (“Demand Capacity” and “Demand Throughput”) and two volume tariff categories (“Volume Individual” and “Volume Boundary”). Deleted assignment criteria that are no longer relevant in light of the proposed abolition of tariff categories. Deleted the example from clause 2.4(d) as it is no longer relevant. Minor updates for consistency in the use of defined terms and to improve readability.
Initial reference Tariffs	Schedule 3, part 4	Schedule 3, parts 4 and 5	<ul style="list-style-type: none"> Updated the unit rates for the initial reference tariffs. Amendments to reflect changes to the terminology used in the RSA. Renaming the ‘Decommissioning and meter removal’ service to ‘Abolishment’ (to avoid the potential for confusion with temporary decommissioning) and changing the charges structure to a more cost-reflective structure. Included a new part 5 providing for the setting of initial chargeable demand for Delivery Points existing at the Commencement Date. Adjustments to the basis on which some of the ancillary charges are applied.
Grandfathering of provision of basic metering equipment charges for more than 15 delivery stations installed at a delivery point	Schedule 3, part 5	Schedule 3, part 6	Updated the grandfathering provision to reflect that the 2021-26 AA is grandfathering tariffs that were available in the 2016 AA period only through the grandfathering provision in that 2016-21 AA (i.e. and were not tariffs otherwise provided for in that AA).
Reference Tariff Adjustment Factors			
Automatic adjustment factor (A)	Schedule 4, part 1	Schedule 4, part 1	Minor updates to refer to relevant Financial Year and provide for consistency in defined terms.
Factor amounts	Schedule 4, part 2	Schedule 4, part 2	<ul style="list-style-type: none"> Amended the licence fee factor when t-2 is Financial Year 2020-21 so the automatic adjustment factor reflects the licence fee factor amounts for 2019-20 and 2020-21. This is required because the automatic adjustment factor amounts are not reflected in

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
			<p>required revenues for the access arrangement period and, without the proposed change, there would be no true-up for the actual licence fee factor amount for 2019-20.</p> <ul style="list-style-type: none"> ▪ Amended the licence fee factor to clarify that, for costs other than the Utilities (Network Facilities) Tax, actual costs are those incurred in financial year t-2 (rather than costs relating to financial year t-2). This is consistent with the approach currently adopted by Evoenergy. It is preferable that actual costs be the costs incurred in year t-2 to avoid the possibility of Evoenergy being required to use forecast expenditure. This is consistent with how the operating expenditure allowance is calculated, which uses a base year of as-incurred operating expenditure as the starting point for forecasting operating expenditure. ▪ Amended the licence fee factor to provide for the Utilities (Network Facilities) Tax to be adjusted based on the actual cost incurred by the Service Provider as a result of the Utilities (Networks Facilities) Tax for the 12 month period ending 31 March in Financial Year t-2. This is because the actual cost for the period 1 April to 30 June in year t-2 is not known at the time Evoenergy proposes its reference tariffs for year t. Under the 2016 AA, Evoenergy used a forecast for that three month period, with a true up in the following year. The proposed amendment will ultimately simplify the calculation of the automatic adjustment factor by avoiding the need for a true up. However, transitional provisions are required in calculating the licence fee factor when Financial Year t-2 is 2019-20, 2020-21 and 2021-22 to ensure there is a true up of all forecast amounts. The transitional provision for 2019-20 also accounts for the variance between the forecast and actual UNFT amounts for the period 1 April 2019 to 31 March 2020, as foreshadowed in Evoenergy's 2020-21 tariff variation notice. ▪ Amended the UAG factor amount calculation to allow for the change in the UAG target rate between 2019/20 and 2020/21 and the Financial Years in the 2021 access arrangement period. ▪ Updated to refer to relevant Financial Years and ensure consistent use of defined terms. ▪ An explanation of the reference tariff adjustment factors is set out in Attachment 10.
Other Schedules			
Interconnection Service	Schedule 6	Schedule 6	<ul style="list-style-type: none"> ▪ Referred to defined terms in the RSA and deleted definitions set out in previous clause 2(c).

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
			<ul style="list-style-type: none"> ▪ Applied to interconnections of a Downstream Network and an Upstream Facility in accordance with the term “Interconnection Service”. ▪ Relocated the authorisations, approvals and licences pre-condition within Schedule 6 from previous clause 4(a)(i) to clause 1(a)(ii) and deleted previous clause 10(a) in Schedule 6 on the basis it is unnecessary in light of the obligation in clause 1(a)(ii). ▪ Relocated and refined the indemnity provision within Schedule 6 from previous clause 10(b) to clause 1(b)(iii). ▪ Included a single provision regarding the location of Delivery Point and Receipt Point and requiring that the location be agreed to by Evoenergy “acting reasonable” (previously clause 5(a) of Schedule 6 for Delivery Point). ▪ Relocated operational provisions relating to Delivery Points (i.e. Metering, Delivery Station and Delivery point, Load Shedding, Cathodic Protection, Installation and Operation and Abandonment/Disconnection) to Part 4 of the Operational Schedule (i.e. Schedule 7). ▪ Relocated provisions relating to charges from the Operational Schedule (and relevant to Interconnection Service) to this Schedule 6 (see paragraph 2 of Schedule 6, previously clause 2.2(a)(vii)) and clarified drafting. ▪ Deleted the requirement that there be an agreement for the Interconnection Service in previous clause 4(a)(ii) in Schedule 6 on the basis it unnecessarily duplicates the general requirement in clause 2.11 of the AA.
Operational Schedule	Schedule 7, part 2	Schedule 7, part 2	<p>This part now relates to new Receipt Points being established under an Interconnection Service. It has been updated as follows:</p> <ul style="list-style-type: none"> ▪ Deleted prior clauses 2.1 and 2.2(a)(vii) on the basis they relate to access to service and charges now set out in Schedule 6 (Interconnection service). ▪ Amended to simplify drafting, including by using defined term “Prospective User”. ▪ Incorporated the requirements in respect of equipment and facilities and testing as set out in part 3 (new clauses 2.3 and 2.4(b)). ▪ Added new clauses 2.5 -2.8 to reflect provisions in the RSA that are relevant to new Receipt Points established under an Interconnection Service.

Clause	2016 AA Reference	2021 AA Reference	Summary of proposed change
	N/A	Schedule 7, part 3	This new part sets out the requirements for new and existing Receipt Stations. These requirements have been moved to the AA from the 2021-26 RSA (clauses 14.2-14.3, 14.6, 14.7 and Annexure 4), with only minor drafting amendments. The have been relocated to the AA as they need to apply to new (as well as existing) receipt stations and if located in the AA can apply to a person establishing a new receipt point who is not a party to a RSA.
	N/A	Schedule 7, part 4	This new part sets out the requirements for new Delivery Points being established under an Interconnection Service and has been relocated from Schedule 6 of the AA (previously clauses 3, 5(b) to (g) and 6 to 9) with minor drafting amendments.
CESS Contingent Payment Index	Schedule 9	Schedule 9	Refer to Attachment 9 which provides a description of the proposed new incentive scheme applying to capital expenditure.
Network map	N/A	Schedule 10	Added new Schedule 10 which includes a map of the Network as at the commencement of the AA.