Attachment 9

Incentive schemes

Access arrangement information

ACT and Queanbeyan-Palerang gas network access arrangement

Submission to the Australian Energy Regulator

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evoenergy

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9 Incentive schemes

Key points

- Incentive schemes can help Evoenergy find better ways of delivering services and reducing costs, which can ultimately benefit customers through better service quality and lower bills.
- In its 2021-26 AA, Evoenergy proposes to retain the existing Efficiency Carryover Mechanism (ECM), with some minor modifications.
- Evoenergy also proposes to introduce a new Capital Expenditure Sharing Scheme (CESS), based on the designs recently approved by the AER in Victoria and NSW. We believe the proposed CESS is in the long-term interests of our customers and will help further improve the efficiency of our capital expenditure program, keeping downward pressure on bills.
- In developing our proposal, we consulted widely with customer and community groups with a focus on ensuring the proposed CESS reflects customer priorities for network safety and reliability.

9.1 Introduction

This attachment sets out the incentive schemes that Evoenergy is proposing for the 2021-26 Access Arrangement (2021-26 AA), and the engagement we have undertaken in developing these schemes.

Under the National Gas Rules, an access arrangement may include one or more incentive schemes to encourage efficiency in the provision of gas network services.[1] These schemes must be consistent with the revenue and pricing principles in the National Gas Rules. The AER may also require incentive schemes to be included in an access arrangement.

Incentive schemes have the potential to enhance the incentive properties of the regulatory regime by encouraging regulated businesses to achieve efficiencies in capital or operating expenditure in the long-term interests of customers. While the basic regulatory framework provides a business with incentives to achieve efficiencies, incentive schemes can further strengthen this framework by ensuring the incentives are uniform across time and do not promote inefficient substitution between operating expenditure (opex), capital expenditure (capex) and service quality.

For its 2021-26 AA, Evoenergy is proposing to:

[1] Rules, Div 9, s98(1).

- retain the current Efficiency Carryover Mechanism (ECM) with minor changes; and
- introduce a new capex incentive scheme – the Capital Expenditure Sharing Scheme (CESS).

In developing our CESS proposal, we considered feedback from stakeholders including consumer representatives, and the AER's Consumer Challenge Panel. The CESS we are proposing ensures that efficiencies do not come at the cost of reduced service quality. The proposed CESS also focuses on providing incentives for the part of our capex program that is within Evoenergy's control.

9.2 Efficiency carryover mechanism

9.2.1 Overview

Under the 2016-21 AA, Evoenergy is subject to an opex efficiency carryover mechanism (ECM). The scheme provides a continuous incentive for Evoenergy to achieve opex efficiencies throughout the AA period. Under the scheme, Evoenergy retains opex underspends and overspends for a fixed 'carryover period' of five years before they are passed to customers (subject to being deemed prudent and efficient by the AER). Any opex underspends or overspends are shared with customers in a ratio of approximately 70 per cent (customers) and 30 per cent (Evoenergy). The ECM also provides an incentive for Evoenergy to reveal its efficient opex in the 'base year', which is then used to determine the opex allowance for the next AA period.

The ECM currently applying to Evoenergy is consistent with Version 2 of the Efficiency Benefit Scheme (EBSS) introduced for Electricity Distributors in 2013. A similar scheme also applies to other gas distribution businesses including Jemena Gas Networks, AusNet Services, Multinet and Australian Gas Networks.

Consistent with the 2013 EBSS, the current ECM incorporates a number of opex exclusions and adjustments for the purposes of carryover amounts. These include the exclusion of:

- approved revenue increments or decrements (e.g. pass-throughs);
- costs that are not forecast using a single year revealed cost approach; and
- an adjustment for one-off factors that result in non-recurrent costs increases/decreases in the base year.

9.2.2 Our proposed ECM

Evoenergy proposes to retain the existing ECM in the 2021-26 AA period. Retaining an ECM will help incentivise Evoenergy to continue delivering ongoing opex efficiencies and remain cost competitive in the long-term interests of consumers. In particular, an ECM provides:

- increased credibility of using base-year expenditure to set future allowances, and hence promotes greater confidence in Evoenergy's opex forecast;
- a uniform incentive to achieve cost efficiencies across the regulatory period, and greater certainty in the regulatory treatment of opex over / under spends; and

- an incentive to bring forward opex efficiencies where it is in the best interests of consumers.

The key features of the ECM which Evoenergy proposes to retain include:

- a five year carryover period;
- approximately 30:70 sharing ratio between Evoenergy and customers;
- exclusion from the calculation of carryover amounts of approved revenue increments or decrements (e.g. pass-throughs), and costs that are not forecast using a single year revealed cost approach; and
- an adjustment to the calculation of incremental gains or losses to account for one-off factors that result in non-recurrent cost increases/decreases in the base year.

To ensure consistent treatment of expenditure across the CESS (discussed in Section 9.3) and the ECM, we have deleted paragraph 3.7(c) from the ECM, which dealt with changes to the classification of costs as either capex or opex during the AA period.[2]

We are also proposing changes to clarify the drafting of the ECM clauses in the 2021-26 AA and remove reference to year six, which was necessary in the 2016-21 AA to account for the impact of the interval of delay year in 2015/16 on the operation of the ECM. Some of the changes we are proposing bring the AA in line with the drafting proposed by JGN in its 2020-25 Access Arrangement. These minor changes do not affect how the scheme operates.

We believe that retaining the ECM is consistent with the revenue and pricing principles in the NGR as it incentivises efficient investment in opex while providing Evoenergy with a reasonable opportunity to recover at least its efficient operating costs.

9.2.3 What we heard from stakeholders

In developing our proposal to retain the ECM, we consulted with consumer groups including the Energy Consumers Reference Council (ECRC) and the Consumer Challenge Panel (CCP). Our proposal for the ECM was also covered in the 'Deep Dive' workshops held by Evoenergy in March 2020. Through this engagement, stakeholders expressed broad support for retaining the ECM and agreed the scheme can encourage Evoenergy to achieve opex efficiencies in the long-term interests of customers.

A small number of stakeholders also provided feedback on the ECM in response to our draft plan. This feedback supported our proposal to retain the scheme in the 2021-26 AA. The CCP's submission to the draft plan proposed that the ECM should exclude opex associated with new connections to align the scheme with our proposed CESS (discussed in Section 9.3). Evoenergy notes that a key feature of the ECM is its ability to enhance the credibility and accuracy of the base-step-trend opex forecasting method. This requires the ECM to include costs forecast using the single-year revealed cost approach. Therefore, Evoenergy has not proposed to exclude opex associated with new connections from the ECM, and considers that this is approach is most consistent with the overall objectives of the scheme.

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[2] The CESS we are proposing is modelled on the CESS which the AER approved for both AGN and Multinet, and recently for JGN (in its draft decision). The CESS for these gas distribution businesses does not have an equivalent requirement to make adjustments to capitalisation policy changes. To maintain consistency with the AER's approved CESS scheme, we have removed this requirement from the ECM.

Submissions to the draft plan also highlighted affordability as a key priority for Evoenergy's customers. We believe that retaining an ECM will support long-term affordability for our customers by helping us deliver opex efficiencies and remain cost-competitive into the future.

9.3 Capital Expenditure Sharing Scheme

9.3.1 Overview

Evoenergy proposes to introduce a capex efficiency incentive scheme for the 2021-26 AA period. In particular, we are proposing a Capital Expenditure Sharing Scheme (CESS) similar to the schemes recently approved by the AER for the four gas distribution businesses (GBDs) in Victoria and Albury, and proposed by JGN in NSW for its 2020-25 AA. We believe that our proposed CESS is in the long-term interests of our customers and will help further improve the efficiency of our capital expenditure program, keeping downward pressure on bills. A gas CESS will also bring Evoenergy in line with the recent approval of the scheme in Victoria and NSW.

The CESS was originally introduced by the AER for electricity distribution businesses in 2013,[3] and is designed to provide a continuous incentive to implement capex efficiencies in the long-term interests of energy consumers. When operating in conjunction with an opex incentive scheme (such as the ECM), a CESS helps provide a balanced incentive to reduce expenditure and avoid inefficient substitution between capex and opex.

In developing our CESS proposal, we considered the prior CESS designs approved by the AER and the extensive consultation undertaken on the scheme by the Victorian GBDs and JGN in NSW. This consultation identified broad support for a CESS for gas distribution networks. We also engaged with consumer and community groups, and the AER's CCP to refine our proposal based on Evoenergy's operating environment and the expectations of our customers.

The consultation process and review of CESS schemes in other jurisdictions identified a general consensus in support of a gas CESS, subject to providing appropriate safeguards to ensure that service quality does not deteriorate as a result of any efficiencies. Reflecting this feedback, our proposed CESS includes a contingent payment factor, whereby any rewards to Evoenergy are reduced if service quality deteriorates below target level.

This section describes the consultation process undertaken by Evoenergy and the details of the CESS we propose for the 2021-26 AA.

9.3.2 What we heard from stakeholders

Evoenergy recognises the importance of ensuring that the proposed CESS appropriately incentivises us to achieve capex efficiencies in the long-term interests of customers, while also ensuring that service quality is maintained. The circumstances affecting each

[3] AER, *Capital Expenditure Incentive Guideline for Electricity Network Service Providers*, November 2013.

gas network are different, and thus it is critical that the CESS reflects both Evoenergy's operating environment and the aspects of network service that matter most to our customers. Therefore, the CESS formed a central part of Evoenergy's stakeholder engagement ahead of our 2021-26 AA revision proposal.

Consumer groups made a significant contribution to our CESS proposal and were instrumental in the selection of appropriate network performance measures and weightings, ensuring the new incentives achieve customers' preferred balance of efficiency and service quality.

We consulted widely on the CESS, with the goal of understanding how the scheme may benefit our customers and ensuring our proposal reflects customer priorities for network safety and reliability. As a starting point for consultation we sought feedback on the CESS model approved by the AER for GDBs in Victoria and NSW, noting that the scheme was subject to extensive consultation in these jurisdictions. We then refined our proposal based on feedback we heard through our engagement process.

In designing a CESS, an important concern is ensuring that any reduction in capital investment is not achieved at the expense of service quality. This is particularly important for gas distribution networks which, in contrast to electricity networks, are not currently subject to a service standards incentive scheme. Our proposed CESS addresses these concerns by including a Contingent Payment Factor which reduces CESS rewards if service quality deteriorates. Therefore, a key focus for our consultation was developing a fit-for-purpose measure of network health, reflecting the service quality outcomes that matter most to our customers.

Our engagement on the CESS included the following components:

- **Presentation to Evoenergy's ECRC in October 2019**, which set out Evoenergy's intention to propose a CESS, and asked participants:
  - Is there support for a CESS for Evoenergy?
  - What factors should Evoenergy consider in the scheme's design?
  - What performance measures should be included and how should they be weighted?
- **Evoenergy's Draft Plan for 2021-26 released in February 2020** outlined Evoenergy's intention to introduce a CESS. The Draft Plan asked stakeholders:
  - What are your views on our proposal to adopt a CESS? What factors should we take into account in applying the scheme to the ACT?
- '**Deep Dive' workshops held on 12 March and 18 March 2020**. The workshops were attended by 23 participants across the two days, with representatives from the Citizen's Jury, vulnerable community member advocates, representatives from Evoenergy's large customers, and the CCP. At the workshops, participants were asked:
  - What criteria should be used to select performance measures for the Contingent Payment Index?
  - What performance measures are most aligned to Evoenergy's capex program, and matter most to customers?

- How should each measure be weighted in the Contingent Payment Index?

Stakeholders were generally supportive of introducing a CESS in the 2021-26 AA, and agreed with the proposal to include a Contingent Payment Factor, under which CESS rewards would be reduced if service quality deteriorates. There was also general agreement that capex associated with new connections should be excluded from the scheme, given that this may be outside of Evoenergy's control, particularly given the current ACT policy uncertainty surrounding gas connections.

At the Deep Dive workshops, stakeholders were asked about the network performance measures to be used in calculating the Contingent Payment Index, and how each measure should be weighted. In small groups, stakeholders engaged in facilitated discussion of four core questions relating to the CESS:

- What factors are the most important in selecting appropriate performance measures for Evoenergy's CESS?
- Based on these criteria, what do consumers view as the most important performance measures?
- What criteria should be applied in determining the weighting applied to each performance measure in the Contingent Payment Index?
- Based on these criteria, what weighting should be applied to each chosen performance measure?

Stakeholders generally agreed that the chosen performance measures should meet the following criteria:

- Based on customers' priorities for service quality and reliability;
- Linked to Evoenergy's capital expenditure program;
- Within Evoenergy's control; and
- Specific and measurable over time.

Stakeholders also agreed that the weighting applied to each performance measures should:

- reflect the extent to which each measure can be influenced by Evoenergy's capex program;
- be simple and straightforward to implement (i.e. based on a common-sense approach, rather than complex formulae); and
- remain stable over time.

Based on these criteria, stakeholders identified the frequency and duration of unplanned supply interruptions as the most important service quality measures. Meter leaks and mains and services leaks were also identified as being important. Stakeholders also discussed other possible measures such as customer service response time, staff welfare, OH&S, and the percentage of meter reads that are estimates. However, the general conclusion was that these measures do not relate directly to Evoenergy's capex program and hence it is not appropriate to include them in the CESS.

As a direct result of this feedback, Evoenergy identified the following performance measures:

- Duration of unplanned supply interruptions (*high importance*)
- Frequency of unplanned supply interruptions (*high importance*)
- Mains and services leaks (*moderate importance*)
- Meter leaks (*moderate importance)*

9.3.2.1 SUBMISSIONS ON THE CESS TO THE DRAFT PLAN

There was limited discussion on the CESS in submissions to the Draft Plan, with two submissions (from ACTCOSS and CCP) providing feedback. CCP was generally supportive of CESS across all regulated network businesses. However, the submissions also expressed some uncertainty about the CESS and whether there was evidence that it would benefit customers. ACTCOSS and CCP commented in particular on the relatively low level of capital expenditure that would be subject to the scheme given the exclusion of new connections capex.

Both ACTCOSS and CCP saw value in providing Evoenergy with strong, customer-centred incentives to maintain high performance standards.

Evoenergy considers that a CESS would be beneficial. This is because a CESS:

- strengthens Evoenergy's incentive to reduce its capex and regulated asset base growth – it provides financial rewards for reducing capex and penalties for overspending
- creates a constant, or smoothed, incentive across the AA period –in the absence of a CESS, a business has a greater incentive to reduce its capex early in an AA period;
- balances incentives across opex and capex, as it provides similar incentives as the ECM for opex; and
- helps to manage capex risks associated with the uncertain future for gas in the ACT

In this way, a CESS should give the AER and our customers greater confidence that Evoenergy's capex is efficient. This, in turn,

- reduces the risk of (and need for) the AER to make ex-post capex adjustments; and
- increases the AER's ability to have regard for actual capex in setting forecast capex allowances.

We also believe that the proposed Contingent Payment Factor provides customers with a strong safeguard against potential adverse outcomes, such as reduced service quality, that may arise from incentives to reduce capex.

Evoenergy's proposal for a CESS was positively influenced by feedback gathered through extensive stakeholder engagement undertaken in developing the NSW and Victorian gas CESS, which identified broad support for the scheme. Evoenergy also notes the successful operation of the CESS for electricity networks since 2013, and believes that a gas CESS will help promote consistency of incentives across regulated businesses.

9.3.3 Evoenergy's proposed CESS design

The general operation of our proposed CESS is based on the AER's CESS for electricity networks, and comprises the same three elements that the AER has approved for the Victorian GDBs, and for JGN NSW in its draft decision:

- A CESS mechanism with a 30:70 sharing ratio of any efficiency gains or losses between Evoenergy and its customers;
- A Contingent Payment Index, based on five network performance measures tailored for Evoenergy's circumstances and selected in consultation with customer groups; and
- A Contingent Payment Factor, which reduces rewards payable under the CESS if the Contingent Payment Index falls below a specified threshold.

The following sections detail and justify the proposed elements of our CESS.

9.3.3.1 CESS MECHANISM

We propose to adopt a similar methodology to calculating efficiency gains and losses as has been adopted by the Victorian GDBs and JGN in NSW. This involves:

- Calculating:
  - *for each year of the AA period* – the NPV of efficiency gains and losses by subtracting our actual (or estimated, for the final year of the AA period) capex, net of any deferrals or capex excluded through ex post reviews, from the AER's capex allowance, adjusted for any pass-through amounts or the reopening of capex, and then
  - *for the AA period as a whole* – the total efficiency gains and losses
- Applying a 30 per cent sharing factor to the total efficiency gains or losses to calculate Evoenergy's share of the gains or losses. The remaining 70 per cent will be received (or paid for) by customers.
- Calculating the within period financing benefits or costs that accrued through the AA period.
- Calculating the net CESS reward or penalty by subtracting the within period financing benefit from Evoenergy's share of gains or losses.
- Applying the Contingent Payment Factor to adjust the net CESS reward based on performance as measured through the Contingent Performance Index.

The adjusted CESS reward or penalty would then be applied as an additional building block adjustment to our revenue for the subsequent AA period (i.e. the 2026-31 AA period). The CESS mechanism also includes a true-up for the difference between year 5 estimated and actual capex once the data is known.

Exclusion of new connections capex from the CESS

Based on feedback received through our engagement on the CESS, and similar to the CESS proposed by JGN, we are proposing to exclude new connections related capex from Evoenergy's CESS. We believe that, to provide a sharp incentive, the CESS should only apply to categories of capex that are within Evoenergy's control. Capex related to new connections is likely to be strongly influenced by market forces and the

policy environment in the ACT. We accept that it may be undesirable to incentivise us to avoid additional unforeseen connections, or to reward us for underspends that arise from connection numbers being less than expected.

Capex efficiency adjustments

Evoenergy proposes to adopt the adjustments that are included in the Victorian and NSW GBD CESS for capex deferrals and ex post capex reviews. We also propose to adopt the same treatment of year 5 capex, which will not be known at the time of the AER decision and needs to be accounted for at the next review.

In particular, we propose that the AER can adjust CESS payments where we defer capex in the 2021-26 AA period and:

- the amount of the deferral is material;
- the amount of the estimated underspend in capex in the 2021-26 AA period is material; and
- the total approved forecast capex in 2021-26 is materially higher than it is likely to have been if a material amount of capex was not deferred.

We also propose that the AER can undertake an ex post review to exclude any capex from our RAB that it deems to be non-conforming capex. Any such amounts would be excluded from our actual (or estimated, in case of the final year) capex when calculating the annual efficiency gain or loss, ensuring we are not penalised twice for non-conforming capex.

Finally, we propose that we would estimate our actual capex for the final year (2025/26) of the 2021-26 AA period, because actual capex data for the final year will not be available at the time of calculating efficiency gains or losses for the final regulatory year. Where actual capex differs from the capex estimate used to calculate the CESS penalty or reward, an adjustment would be made to account for the difference.

9.3.3.2 CONTINGENT PAYMENT INDEX

Evoenergy proposes to apply a Contingent Payment Index, which will serve the same purpose as the indices proposed for the Victorian and NSW gas CESS schemes.

As discussed in Section 9.3.2, we worked with our customer stakeholders to identify performance measures and weights that are fit-for-purpose for Evoenergy's operating environment. The measures were selected based on aspects of network performance that matter most to our customers, are within Evoenergy's control, and can be influenced by Evoenergy's capex program. Table 9.1 shows the performance measures and weightings for our proposed Contingent Payment Index.

Table 9.1 CESS performance measures and weightings identified by stakeholders

CESS Performance Measure	Weighting
Average duration of unplanned supply interruptions (hours/1,000 customers)	30%
Average frequency of unplanned supply interruptions (outages/1,000 customers)	30%
Mains and services leaks (per kilometre of mains)	20%
Meter leaks (per 1,000 customers)	20%

Clause 4 and Schedule 9 of our proposed 2021-26 AA provides a detailed specification of the Contingent Payment Index, including how each measure will be calculated.

9.3.3.3 TARGET SETTING

In order to measure our performance against the Contingent Payment Index, we must set targets for each performance measure in the index. We propose to apply the same approach for setting targets as used in the Victorian and NSW GDBs' CESS and the AER's electricity STPIS guideline.

This involves:

- setting a target for each measure using three years of historical data, where available; and
- using a simple average to avoid unnecessary complexity.

This approach was supported through engagement with our customer groups. Some stakeholders noted that the targets should be set at levels that provide stability over time and hence minimise the possibility of big 'wins' or 'losses' as a result of fluctuations in performance measures. We propose to set our targets using a three year simple average of historical data. While we note that some GDBs have applied five year averages, Evoenergy has chosen a three year period because this allows targets to be calculated consistently across all measures following changes to Evoenergy's data reporting system around 2016/17.[4]

We believe that taking a three year average for each performance measure, and combining the five performance measures into a single Contingent Payment Index, will provide a sufficient level of stability while also ensuring they reflect recent trends in service performance.

We have therefore used the last three years of available historical data to calculate the targets for each of the proposed measures. The proposed targets and data sources are shown in Table 9.2

[4] Once more data becomes available, Evoenergy will consider transitioning to a five year averaging period for the 2026-21 Access Arrangement period.

Table 9.2 CESS performance measures calculated targets

Measure	Basis	Target
Average duration of unplanned supply interruptions	Hours per 1,000 customers	2.4357
Average frequency of unplanned supply interruptions	Outages per 1,000 customers	0.6562
Mains and services leaks	Leaks per kilometre of mains	0.0504
Meter leaks	Leaks per 1,000 customers	11.8062

Using the proposed weightings for each performance measure, the targets will be combined into an overall target for the Contingent Payment Index, which will be set at a base index score of 100. If our performance decreases below the target level, the index value will decrease below 100. Similarly, an index value over 100 means that Evoenergy has exceeded its performance target overall.

9.3.3.4 THE CONTINGENT PAYMENT FACTOR

The Contingent Payment Factor determines the degree to which CESS rewards are scaled down where service performance falls below the target level.

We propose to apply the same approach that is used in the Victorian GBD's CESS, and proposed by JGN in NSW. This involves calculating the Contingent Payment Index at the end of the AA period, and applying a sliding scale whereby CESS rewards are reduced such that:

- A Contingent Payment Index of 100 or above means Evoenergy will receive the full CESS reward (calculated as 30 per cent of the capex underspend)
- A Contingent Payment Index of 80 or below means that Evoenergy will receive no CESS reward; and
- Evoenergy will receive a share of its CESS reward (according to a linear sliding scale) if the Contingent Payment Index falls between 80 and 100.

As noted in the previous section, an index score of 100 corresponds to Evoenergy's historical performance, calculated as an average over three years for each measure (weighted by each measures set weight).

Since the objective of the contingent payment mechanism is to ensure that service standards do not deteriorate, there is no additional CESS reward for API scores above 100.

Shortened forms

Term	Meaning
AA	Access Arrangement
ACT	Australian Capital Territory
ACT climate change strategy	ACT Government's Climate Change Strategy 2019-25
ACTCOSS	ACT Council of Social Service
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
ANU	Australian National University
ARENA	Australian Renewable Energy Agency
BISOE	BIS Oxford Economics
CABS	A Jemena Ltd proprietary system providing retailer billing, demand customer management, network balancing and retailer nomination services.
CALD	culturally and linguistically diverse (community)
capex	capital expenditure
CCP, CCP24	the AER's Consumer Challenge Panel (number 24)
CEG	Competition Economists Group
CEPA	Centre for Efficiency and Productivity Analysis (University of Queensland)
CESS	Capital Expenditure Sharing Scheme
CIE	Centre of International Economics
CIT	Canberra Institute of Technology
CPI	consumer price index
DAE	Deloitte Access Economics
DAMS	Distribution asset management services (agreement)
DC	Demand Capacity Tariff
DT	Demand Throughput Tariff
E2G	Electricity-to-gas
EEIS	Energy Efficiency Improvement Scheme
ECM	Efficiency Carryover Mechanism
ECRC	Energy Consumer Reference Council
EGWWS	electricity, gas, water and waste services (sector)
EI	Economic Insights
EIL	Energy Industry Levy
ETC	Estimated cost of corporate income tax
EPSDD	ACT Environment, Planning and Sustainable Development Directorate

Term	Meaning
GDBs	gas distribution businesses
GN21	Evoenergy gas network access arrangement 2021–26
GJ	gigajoule = 10^9 joules
GWh	gigawatt hour
I&C	Industrial and commercial
ITAUF	Information Technology Asset Utilisation Fee
km	kilometre
LPG	liquid petroleum gas
MDLs	Meter Data Loggers
NGL	National Gas Law
NGO	National Gas Objective
NSW	New South Wales
opex	operating expenditure
PFP	Partial Factor Productivity
PJ	petajoule = 10^{15} joules
PLS	Pressure Limiting Station
PPA	power purchase agreement
PTRM	post-tax revenue model
QPRC	Queanbeyan–Palerang Regional Council (local government authority)
RAB	regulatory asset base
RFM	roll-forward model
RIN	Regulatory Information Notice
Rules	National Gas Rules
SDRS	Secondary District Regulator Sets
TAB	tax asset base
TJ	terajoule = 10^{12} joules
UAG	unaccounted for gas
UNFT	Utilities Network Facilities Tax
VB	Volume Boundary (tariff class)
VI	Volume Individual (tariff class)