

# RIN Appendix 1 - Compliance with the Regulatory Information Notice Schedule 1

**Regulatory proposal for the ACT electricity distribution network 2019-24  
January 2018**

Disclaimer: On 1 January 2018, the part of ActewAGL that looks after the electricity network changed its name to Evoenergy. This change has been brought about from a decision by the Australian Energy Regulator. Unless otherwise stated, ActewAGL Distribution branded documents provided with this regulatory proposal are Evoenergy documents.

GENERAL REQUIREMENTS		RESPONSE
<b>1. PROVIDE INFORMATION</b>		
1.1	<p>Provide the information required in each regulatory template in the Microsoft Excel Workbook 1 - Regulatory determination, Workbook 2 - New category analysis, Workbook 5 - EBSS and Workbook 6 - CESS attached at Appendix A, completed in accordance with:</p> <ul style="list-style-type: none"> <li>(a) this <i>notice</i>;</li> <li>(b) the instructions in the relevant Microsoft Excel Workbooks attached at Appendix A;</li> <li>(c) the instructions in Appendix E;</li> <li>(d) the service classifications set out in the framework and approach paper; and</li> <li>(e) ActewAGL Distribution's cost allocation method.</li> </ul>	Data provided in Workbooks 1, 2 & 6. EBSS is not applicable for this regulatory period
1.2	<p>If:</p> <ul style="list-style-type: none"> <li>(a) ActewAGL Distribution's cost allocation method has changed during the current regulatory control period, or</li> <li>(b) ActewAGL Distribution's service classifications have changed from the current regulatory control period, or</li> <li>(c) ActewAGL Distribution proposes to divert from the service classifications set out in the relevant framework and approach paper, or</li> <li>(d) ActewAGL Distribution proposes to change its cost allocation method for the forthcoming regulatory control period;</li> </ul> <p>such that there would be material changes to information previously submitted to the AER ActewAGL Distribution must use the regulatory templates in Workbook 3 – Recast category analysis and Workbook 4 – Recast economic benchmarking attached at Appendix A to submit revised historical information.</p>	No material changes
1.3	<p>For all information, other than forecast information, provide in accordance with this notice and the instructions in Appendix E, a basis of preparation demonstrating how ActewAGL Distribution has complied with this notice in respect of:</p> <ul style="list-style-type: none"> <li>(a) the information in each regulatory template in the Microsoft Excel Workbooks attached at Appendix A; and</li> <li>(b) the information prepared in accordance with the following requirements in Schedule 1 of this notice: <ul style="list-style-type: none"> <li>(i) paragraph 1.2</li> <li>(ii) paragraph 5.1(a)(ii)</li> <li>(iii) paragraph 8.5</li> <li>(iv) paragraph 13 (13.5 and 13.6)</li> <li>(v) paragraph 15 (15.2 and 15.3)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>(a) Refer to RIN Appendix 8: Basis of preparation</li> <li>(b) Refer to regulatory proposal <ul style="list-style-type: none"> <li>(i) No material change to the cost allocation method</li> <li>(ii) Refer to RIN Appendix 2: Supplementary information</li> </ul> </li> </ul>

GENERAL REQUIREMENTS		RESPONSE
	(vi) paragraph 16 (16.2-16.7, 16.10)	<p>(iii) No payments have been made to date. No expected payments identified</p> <p>(iv) Refer to Attachment 14: Alternate Control Services; Modelling appendix: Ancillary services cost build up model</p> <p>(v) Refer to Attachment 14: Alternate Control Services; Modelling appendix: Ancillary services cost build up model</p>
1.4	<p>Provide material used for the purposes of preparing the regulatory proposal:</p> <p>(a) all consultants' reports commissioned and relied upon in whole or in part;</p> <p>(b) all material assumptions relied upon;</p> <p>(c) a table that references each response to a paragraph in this Schedule 1 and where it is provided in or as part of the regulatory proposal;</p> <p>(d) a table that references each document provided in or as part of the regulatory proposal and its relationship to other documents provided; and</p> <p>(e) each document identified in paragraph 1.4(d) must be given a meaningful filename in the form: ActewAGL Distribution – [Author] – [title] – [date] – [public/confidential], where:</p> <p>(i) Author is the author of the file if not ActewAGL Distribution, for example a consultant or other third party;</p> <p>(ii) Title provides a meaningful description of the content of document, with limited reliance on acronyms or cross references, for example "Appendix 1A" is not meaningful, but "Appendix 1A – Cost allocation method" is;</p> <p>(iii) Date is a relevant date associated with the file, generally the date the document was created</p>	<p>(a) Various appendices</p> <p>(b) Refer to RIN Appendix 16: Material Assumptions</p> <p>(c) Refer to RIN Appendix 1: Compliance with the Regulatory Information Notice Schedule 1</p> <p>(d) Refer to RIN Appendix 13: Regulatory proposal document index</p> <p>(e) Refer to RIN Appendix 13: Regulatory proposal document index</p>

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	(iv) Public/confidential identifies if the file in its entirety can be published (public); or if it contains any information which is the subject of a claim for confidentiality in accordance with paragraph 32 of this notice (confidential).	
1.5	<p>Provide for each material assumption identified in the response to paragraph 1.4(b):</p> <ul style="list-style-type: none"> <li>(a) its source or basis;</li> <li>(b) if applicable, its quantum;</li> <li>(c) whether and how the assumption has been applied and was taken into account; and</li> <li>(d) the effect or impact of the assumption on the capital and operating expenditure forecasts in the forthcoming regulatory control period taking into account: <ul style="list-style-type: none"> <li>(i) the actual expenditure incurred during the current regulatory control period; and</li> <li>(ii) the sensitivity of the forecast expenditure to the assumption.</li> </ul> </li> </ul>	Refer to RIN Appendix 16: Material assumptions
1.6	Provide reconciliation of the capital and operating expenditure forecasts provided in the regulatory templates to the proposed capital and operating allowances in the post-tax revenue model for the forthcoming regulatory control period.	The capital and operating expenditure forecasts provided in the regulatory templates are equivalent to the capital expenditure and operating expenditure in the post-tax revenue model for the forthcoming regulatory control period, after adjusting for equity and debt raising costs.
1.7	<p>Where the regulatory proposal varies or departs from the application of any component or parameter of the capital efficiency sharing scheme, efficiency benefit sharing scheme, demand management incentive scheme or service target performance incentive scheme as set out in the framework and approach paper, for each variation or departure explain:</p> <ul style="list-style-type: none"> <li>(a) the reasons for the variation or departure, including why it is appropriate;</li> <li>(b) how the variation or departure aligns with the objectives of the relevant scheme; and</li> <li>(c) how the proposed variation or departure will impact the operation of the relevant scheme.</li> </ul>	Refer to Attachment 10: Incentive schemes
<b>2. CLASSIFICATION OF SERVICES</b>		

GENERAL REQUIREMENTS		RESPONSE
2.1	Identify each proposed service classification in the regulatory proposal which departs from a service classification set out in the framework and approach paper and explain: (a) the reasons for the departure, including why the proposed service classification is more appropriate; and (b) how service will differ under the proposed service classification in comparison to that in the framework and approach paper.	Refer to Attachment 4: Classification of services
2.2	If the proposed service classifications in the regulatory proposal depart from any of the service classifications set out in the framework and approach paper: (a) provide, in a second set of regulatory templates, all information required in each regulatory template in accordance with the instructions contained therein, modified as necessary, to incorporate the proposed service classifications; and (b) identify and explain where the regulatory templates differ.	Refer to Attachment 4: Classification of services
<b>3. CONTROL MECHANISMS</b>		
3.1	For the forecast revenues that ActewAGL Distribution proposes to recover from providing direct control services over the forthcoming regulatory control period provide: (a) formulaic expressions for the basis of control mechanisms for standard control services and for alternative control services; and (b) a detailed explanation and justification for each component that makes up the formulaic expression.	Refer to Attachment 11: Control mechanism
3.2	Also demonstrate: (a) how ActewAGL Distribution considers the control mechanisms are compliant with the framework and approach paper; and (b) for standard control services, how ActewAGL Distribution considers the control mechanisms are also compliant with clause 6.2.6 and part C of Chapter 6 of the NER.	Refer to Attachment 11: Control mechanism
<b>4. CAPITAL EXPENDITURE</b>		
<b>General</b>		

GENERAL REQUIREMENTS		RESPONSE
4.1	<p>Provide justification for ActewAGL Distribution's total forecast capex, including the following information:</p> <ul style="list-style-type: none"> <li>(a) why the total forecast capex is required for ActewAGL Distribution to achieve each of the objectives in clause 6.5.7(a) of the NER;</li> <li>(b) how ActewAGL Distribution's total forecast capex reasonably reflects each of the criteria in clause 6.5.7(c) of the NER;</li> <li>(c) how ActewAGL Distribution's total forecast capex accounts for the factors in clause 6.5.7(e) of the NER;</li> <li>(d) an explanation of how the plans, policies, procedures and regulatory obligations or requirements identified in Workbook 1 – regulatory determination, regulatory templates 7.1 and 7.3 have been used to develop forecast capex; and</li> <li>(e) an explanation of how each response provided to paragraph 4.1 (a) to (d) is reflected in any increase or decrease in expenditures or volumes, particularly between the current and forthcoming regulatory control periods, provided in Workbook 1 – Regulatory determination, regulatory templates 2.1 to 2.11.</li> </ul>	<p>Refer to Attachment 5: Capital expenditure; Attachment 1: Asset management and governance</p> <p>In relation to (d) and template 7.3 a statement on obligations is included the template. Please refer to template 7.3.</p>
4.2	<p>Provide the model(s) and methodology ActewAGL Distribution used to develop its total forecast capex, including:</p> <ul style="list-style-type: none"> <li>(a) A description of how ActewAGL Distribution prepared the forecast capex, including: <ul style="list-style-type: none"> <li>(i) how its preparation differed or related to budgetary, planning and governance processes used in the normal operation of ActewAGL Distribution's business;</li> <li>(ii) the processes for ensuring amounts are free of error and other quality assurance steps; and</li> <li>(iii) if and how ActewAGL Distribution considered the resulting amounts, when translated into price impacts, were in the long term interest of consumers.</li> </ul> </li> <li>(b) any source material used (including models, documentation or any other items containing quantitative data); and</li> <li>(c) calculations that demonstrate how data from the source material has been manipulated or transformed to generate data provided in the regulatory templates in Workbook 1 – Regulatory determination.</li> </ul>	<p>For (a) and (b) refer to Modelling appendix: Capex model and Attachment 5: Capital expenditure</p> <p>For (c) refer to RIN Appendix 8: Basis of preparation</p>
4.3	<p>Identify which items of ActewAGL Distribution's forecast capex are:</p> <ul style="list-style-type: none"> <li>(a) derived directly from competitive tender processes;</li> <li>(b) based upon competitive tender processes for similar projects;</li> <li>(c) based upon estimates obtained from contractors or manufacturers;</li> <li>(d) based upon independent benchmarks;</li> <li>(e) based upon actual historical costs for similar projects; and</li> </ul>	<p>Refer to RIN Appendix 2: Supplementary information</p>

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	(f) reflective of any amounts for risk, uncertainty or other unspecified contingency factors, and if so, how these amounts were calculated and deemed reasonable and prudent.	
4.4	Provide all documents which were materially relied upon and relate to the deliverability of forecast capex and explain the proposed deliverability.	Refer to Attachment 5: Capital expenditure
<b>Capex categories</b>		
4.5	Describe each capex category and expenditures comprising these categories identified in the regulatory templates, including: <ul style="list-style-type: none"> <li>(a) key drivers for expenditure;</li> <li>(b) an explanation of how expenditure is distinguished between:               <ul style="list-style-type: none"> <li>(i) greenfield driven and reinforcement driven augmentation capex;</li> <li>(ii) connections expenditure and augmentation capex;</li> <li>(iii) replacement capex driven by condition and asset replacements driven by other drivers (e.g. the need for greenfield or reinforcement driven augmentation capex); and</li> <li>(iv) any other capex category or opex category where ActewAGL Distribution considers that there is reasonable scope for ambiguity in categorisation.</li> </ul> </li> </ul>	Refer to Attachment 5: Capital expenditure
<b>5. REPLACEMENT CAPITAL EXPENDITURE MODELLING</b>		
5.1	In relation to information provided in Workbook 1 – Regulatory determination, regulatory template 2.2 and with respect to the AER's repex model, provide: <ul style="list-style-type: none"> <li>(a) For individual asset categories in each asset group set out in the regulatory templates, provide in a separate document:               <ul style="list-style-type: none"> <li>(i) a description of the asset category, including:                   <ul style="list-style-type: none"> <li>(A) the assets included and any boundary issues (i.e. with other asset categories);</li> <li>(B) an explanation of how these matters have been accounted for in determining quantities in the age profile;</li> <li>(C) an explanation of the main drivers for replacement (e.g. condition); and</li> <li>(D) an explanation of whether the replacement unit cost provides for a complete replacement of the asset, or some other activity, including an extension of the asset's life (e.g. pole staking) and whether the costs of this extension or other activity are capitalised or not.</li> </ul> </li> </ul> </li> </ul>	(a) Refer to RIN Appendix 2: Supplementary information (b) Refer to Attachment 5: Capital expenditure; Attachment 1: Asset management and governance; Appendix 1.15: Annual planning report

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	<p>(ii) an estimate of the proportion of assets replaced for each year of the current regulatory control period, due to:</p> <p>(A) aging of existing assets (e.g. condition, obsolesce, etc.) that should be largely captured by this form of replacement modelling;</p> <p>(B) replacements due to other factors (and a description of those factors);</p> <p>(C) additional assets due to the augmentation, extension, development of the network; and</p> <p>(D) additional assets due to other factors (and a description of those factors).</p> <p>(b) For the previous, current and forthcoming regulatory control periods, explain the drivers or factors that have changed network replacement expenditure requirements. Identify and quantify the relative effect of individual matters within the following categories:</p> <p>(i) rules, codes, licence conditions, statutory requirements;</p> <p>(ii) internal planning and asset management approaches;</p> <p>(iii) measurable asset factors that affect the need for expenditure in this category (e.g. age profiles, risk profiles, condition trend, etc.). Identify and quantify individual factors;</p> <p>(iv) the external factors that can be forecast and the outcome measured (e.g. demand growth, customer numbers) that affect the need for expenditure in this category. Identify and quantify individual factors, covering the forecasts and the outcome (external factors to be discussed here do not relate to changing obligations which are covered in paragraph 11.3 and 11.8);</p> <p>(v) technology/solutions to address needs, covering:</p> <p>(A) network; and</p> <p>(B) non-network.</p> <p>(vi) any other significant matters.</p> <p>(vii) Identify and provide information or documentation to justify and support any responses to paragraph 5.1(b) (i)-(vi).</p> <p>The information provided in response to paragraph 5.1(b) above should at least distinguish between the asset categories listed in Workbook 1 – Regulatory determination, regulatory template 2.2.</p>	
<b>6. AUGMENTATION CAPITAL EXPENDITURE MODELLING</b>		
6.1	Any instructions in this notice relating to the augex model must be read in conjunction with the augex model guidance document available on the AER's website ( <a href="http://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/expenditure-forecast-assessment-guideline/final-decision">http://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/expenditure-forecast-assessment-guideline/final-decision</a> ).	Noted



GENERAL REQUIREMENTS	RESPONSE
<p>6.2 In relation to information provided in Workbook 1 – Regulatory determination, regulatory template 2.4 and with respect to the AER’s augex model:</p> <p>(a) Separately for sub-transmission lines, sub-transmission and zone substations, HV feeders and distribution substations, Actual must explain how it:</p> <p>(i) Prepared the maximum demand data (weather corrected at 50 per cent probability of exceedance) provided in the asset status tables 2.4.1 to 2.4.4, including where relevant, explanations of each of:</p> <p>(A) how this value relates to the maximum demand that would be used for normal planning purposes;</p> <p>(B) whether it is based upon a measured value, and if so, where the measurement point is and how abnormal operating conditions are allowed for;</p> <p>(C) whether it is based on estimated (rather than actual measured) demand, and if so, the basis of this estimation process and how it is validated; and</p> <p>(D) the relationship of the values provided to raw unadjusted maximum demand; and the relationship of the values provided to the values that could be expected from weather corrected maximum demand measures that reflect a 10 per cent probability of exceedance year.</p> <p>(ii) Determined the rating data provided in the asset status tables 2.4.1 to 2.4.4, including where relevant:</p> <p>(A) the basis of the calculation of the ratings in that segment, including asset data measured and assumptions made; and</p> <p>(B) the relationship of these ratings with ActewAGL’s approach to operating and planning the network. For example, if alternative ratings are used to determine the augmentation timing, these should be defined and explained.</p> <p>(iii) Determined the growth rate data provided in the asset status tables 2.4.1 to 2.4.4. This should clearly indicate how these rates have been derived from maximum demand forecasts or other load forecasts available to ActewAGL Distribution.</p> <p>(b) In relation to the capex-capacity table 2.4.6, ActewAGL Distribution must explain:</p> <p>(i) the types of cost and activities covered. Clearly indicate what non-field analysis and management costs (i.e. direct overheads) are included in the capex and what proportion of capex these cost types represent;</p> <p>(ii) how it determined and allocated actual capex and capacity to each of the segment groups, covering:</p> <p>(A) the process used, including assumptions, to estimate and allocate expenditure where this has been required; and</p> <p>(B) the relationship of internal financial and/or project recording categories to the segment groups and process used.</p>	<p>(a)(i)-(ii) Refer to RIN Appendix 2: Supplementary information</p> <p>(a)(iii) Refer to Appendix 3.3: Demand forecasting update and support; RIN Appendix 2: Supplementary information</p> <p>(b)(i) Costs exclude network and corporate overheads and only include directly attributable field costs and capitalised engineering / design costs as per ActewAGL Distribution’s approved cost allocation methodology</p> <p>(b)(ii)-(iii) Refer to Attachment 5: Capital expenditure</p> <p>(c) “Unmodelled” augmentation projects include drivers such as reliability, earthing and SCADA improvements. The bulk of these expenses relate to earthing projects at substations. These projects do not generally add capacity, and hence there is little or no secondary relationship to maximum demand or utilisation.</p> <p>These projects can be considered to improve service levels, through improving either the safety, reliability, flexibility</p>

GENERAL REQUIREMENTS	RESPONSE
<ul style="list-style-type: none"> <li>(iii) how it determined and allocated estimated/forecast capex and capacity to each of the segment groups, covering: <ul style="list-style-type: none"> <li>(A) the relationship of this process to the current project and program plans; and</li> <li>(B) any other higher-level analysis and assumptions applied.</li> </ul> </li> <li>(c) Describe the projects and programs ActewAGL Distribution has allocated to the unmodelled augmentation categories in table 2.4.6, covering: <ul style="list-style-type: none"> <li>(i) the proportion of unmodelled augmentation capex due to this project or program type;</li> <li>(ii) the primary drivers of this capex, and whether in ActewAGL Distribution's view, there is any secondary relationship to maximum demand and/or utilisation of the ActewAGL Distribution network; and</li> </ul> </li> <li>(d) Separately for each network segment that ActewAGL Distribution defined in the model segment data table 2.4.5, whether the outcome of such a project or program, whether intended or not, should be an increase in the capability of the ActewAGL Distribution network to supply customer demand at similar service levels, or the improvement in service levels for a similar customer demand level: <ul style="list-style-type: none"> <li>(i) Describe the network segment, including: <ul style="list-style-type: none"> <li>(A) the boundary with other connecting network segments; and</li> <li>(B) the main reasoning for the individual segment (e.g. as opposed to forming a more aggregate segment).</li> </ul> </li> <li>(ii) Explain the utilisation threshold statistics provided (i.e. the mean and standard deviation), including: <ul style="list-style-type: none"> <li>(A) the methodology, data sources and assumptions used to derive the parameters;</li> <li>(B) the relationship to internal or external planning criteria that define when an augmentation is required;</li> <li>(C) the relationship to actual historical utilisation at the time that augmentations occurred for that asset category;</li> <li>(D) ActewAGL Distribution's views on the most appropriate probability distribution to simulate the augmentation needs of that network segment; and</li> <li>(E) the process applied to verify that the parameters are a reasonable estimate of utilisation limit for the network segment.</li> </ul> </li> <li>(iii) Regarding the augmentation unit cost and capacity factor provided, provide an explanation of each of: <ul style="list-style-type: none"> <li>(A) the methodology, data sources and assumptions used to derive the parameters;</li> <li>(B) the relationship of the parameters to actual historical augmentation projects, including the capacity added through those projects and the cost of those projects;</li> <li>(C) the possibility of double-counting in the estimates, and processes applied to ensure that this is appropriately accounted for (e.g. where an individual project may add capacity to various segments); and</li> <li>(D) the process applied to verify that the parameters are a reasonable estimate for the network segment.</li> </ul> </li> </ul> </li></ul>	<p>and operability of the network, enhancing ActewAGL Distribution's ability to provide network services to customers</p> <p>(d) Refer to RIN Appendix 2: Supplementary information</p> <p>(e) Attachment 5: Capital expenditure</p>

GENERAL REQUIREMENTS		RESPONSE
	<p>(e) Explain the factors ActewAGL Distribution considers may result in different augmentation requirements for itself as compared to other NEM-based DNSPs. ActewAGL Distribution must account for the degree that different augmentation requirements are driven by differences in asset utilisation and maximum demand growth. ActewAGL Distribution must also explain all other factors, specific to its network, which would result in different augmentation requirements when compared to a DNSP with similar asset utilisation and maximum demand growth. The explanation must clearly indicate those factors that may impact:</p> <ul style="list-style-type: none"> <li>(i) the maximum achievable utilisation of assets for ActewAGL Distribution; and</li> <li>(ii) the likely augmentation project and/or cost.</li> </ul> <p>For each significant factor discussed, ActewAGL Distribution must indicate relevant model segments and estimate the impact these factors will have on its augmentation levels and associated capex compared to other DNSPs.</p>	
<b>7. CONNECTIONS EXPENDITURE</b>		
7.1	<p>Provide and describe the methodology and assumptions used to prepare the forecasts of connection works including:</p> <ul style="list-style-type: none"> <li>(a) Estimation of connection unit costs for each customer type; and</li> <li>(b) Connection volumes for each customer type</li> </ul>	Refer to Appendix 5.5: Customer initiated works report
7.2	<p>ActewAGL Distribution must provide its estimation of customer contributions based upon the estimated life and revenue to be recovered from connection assets, including:</p> <ul style="list-style-type: none"> <li>(a) the expected life of the connection;</li> <li>(b) the average consumption expected by the customer over the life of the connection; and</li> <li>(c) any other factors that influence the expected recovery of the ActewAGL Distribution network use of system charge to customers.</li> </ul>	Refer to Appendix 5.5: Customer initiated works report
<b>8. NON-NETWORK ALTERNATIVES</b>		
8.1	Identify the policies and strategies and procedures in the response to Workbook 1 – Regulatory determination, regulatory template 7.1 which relate to the selection of efficient non-network solutions.	Refer to Attachment 5: Capital expenditure; Attachment 6: Operating expenditure

GENERAL REQUIREMENTS		RESPONSE
8.2	Explain the extent to which the provision for efficient non-network alternatives has been considered in the development of the forecast capex proposal and the forecast opex proposal.	Refer to Attachment 5: Capital expenditure
8.3	Identify each non-network alternative that ActewAGL Distribution has: (a) commenced during the current regulatory control period; and (b) selected to commence during, or will continue into, the forthcoming regulatory control period.	(a) Not applicable (b) Refer to Attachment 5: Capital expenditure; Attachment 6: Operating expenditure
8.4	For each non-network alternative identified in the response to paragraph 8.3, provide a description, including cost and location.	Refer to Attachment 5: Capital expenditure
8.5	Provide, for each year of the current regulatory control period, and for the forthcoming regulatory control period, details of each payment made, or expected to be made, by ActewAGL Distribution to an Embedded Generator in reflection of any costs avoided by deferring augmentation of: (a) ActewAGL Distribution's distribution network; or (b) the relevant transmission network.	No payments have been made to date. No expected payments identified. (a) Refer to Attachment 6: Operating expenditure; Appendix 6.2: Strathnairn demand management step change (b) Not applicable
<b>9. FORECAST INPUT PRICE CHANGES</b>		
9.1	Provide, in Workbook 1 – Regulatory determination, regulatory template CPI series, the CPI series and index used by ActewAGL Distribution in its forecast capex proposal and the forecast opex proposal.	Refer to Workbook 1
9.2	Provide, in Workbook 1 – Regulatory determination, regulatory template 2.14, the capex and opex price changes assumed by ActewAGL Distribution in its forecast capex proposal and the forecast opex proposal. All price changes must be expressed in percentage year on year real terms.	Refer to Workbook 1, template 2.14

GENERAL REQUIREMENTS		RESPONSE
9.3	<p>Provide:</p> <ul style="list-style-type: none"> <li>(a) the model(s) used to derive and apply the materials price changes, including model(s) developed by a third party;</li> <li>(b) in relation to labour escalators, a copy of the current Enterprise Bargaining Agreement or equivalent agreement; and</li> <li>(c) documents supporting or relied upon that explain the change in the price of goods and services purchased by ActewAGL Distribution, including evidence that any materials price forecasting method explains the price of materials previously purchased by ActewAGL Distribution.</li> </ul>	<p>(a) Refer to Modelling Appendix: Capex model; Forecast SCS opex model</p> <p>(b) Refer to RIN Appendix 11: Enterprise Bargaining Agreement</p> <p>(c) Refer to Appendix 5.6: Real cost escalation forecasts to 2023/24</p>
9.4	<p>Provide also an explanation of:</p> <ul style="list-style-type: none"> <li>(a) the methodology underlying the calculation of each price change, including: <ul style="list-style-type: none"> <li>(i) sources;</li> <li>(ii) data conversions;</li> <li>(iii) the operation of any model(s) provided under paragraph 9.3(a); and</li> <li>(iv) the use of any assumptions such as lags or productivity gains;</li> </ul> </li> <li>(b) whether the same price changes have been used in developing both the forecast capex proposal and forecast opex proposal; and</li> <li>(c) if the response to paragraph 9.4(b) is negative, why it is appropriate for different expenditure escalators to apply.</li> </ul>	<p>Refer to Attachment 5: Capital expenditure; Attachment 6: Operating expenditure; Appendix 5.6: Real cost escalation forecasts to 2023/24</p>
9.5	<p>If an agreement provided in response to paragraph 9.3(b) is due to expire during the forthcoming regulatory control period, explain the progress and outcomes of any negotiations to date to review and replace the current agreement.</p>	<p>The current Enterprise Bargaining Agreement commenced on 15 June 2017 and nominally expires on 1 July 2020. The negotiations for a new Agreement are expected to commence in early 2020.</p>
<b>10. OPERATING AND MAINTENANCE EXPENDITURE</b>		
<b>Total forecast operating and maintenance expenditure (opex)</b>		

GENERAL REQUIREMENTS		RESPONSE
10.1	<p>Provide:</p> <ul style="list-style-type: none"> <li>(a) the model(s) and the methodology ActewAGL Distribution used to develop total forecast opex;</li> <li>(b) justification for ActewAGL Distribution's total forecast opex, including: <ul style="list-style-type: none"> <li>(i) why the proposed total forecast opex is required for ActewAGL Distribution to achieve each of the objectives in clause 6.5.6(a) of the NER;</li> <li>(ii) how ActewAGL Distribution's total forecast opex reasonably reflects each of the criteria in clause 6.5.6(c) of the NER; and</li> <li>(iii) how ActewAGL Distribution's total forecast opex accounts for the factors in clause 6.5.6(e) of the NER;</li> </ul> </li> </ul>	<p>(a) Refer to Modelling Appendix: Forecast SCS opex model</p> <p>(b) Refer to Attachment 6: Operating expenditure</p>
10.2	<p>Provide:</p> <ul style="list-style-type: none"> <li>(a) the quantum of non-recurrent opex for each year of the forthcoming regulatory control period; and</li> <li>(b) an explanation of the driver of each non-recurrent opex;</li> </ul>	No material non-recurrent operating expenditure forecast for the forthcoming regulatory control period
10.3	<p>If ActewAGL Distribution used a revealed cost base year approach to develop its total forecast opex proposal, provide:</p> <ul style="list-style-type: none"> <li>(a) in Microsoft Excel format, reconciliation (including all calculations and formulae) of ActewAGL Distribution's forecast total opex proposal to forecast standard control services opex and dual function assets opex by opex driver in Workbook 1 - Regulatory determination, regulatory template 2.16, tables 2.16.1 and 2.16.3;</li> <li>(b) the base year ActewAGL Distribution used; and</li> <li>(c) explanation and justification for why that base year represents efficient and recurrent costs;</li> </ul>	<p>(a) Refer to Attachment 6: Operating expenditure; Workbook 1,</p> <p>(b)-(c) Refer to Attachment 6: Operating expenditure</p>
10.4	<p>If ActewAGL Distribution does not use a revealed cost base year approach to develop its total forecast provide:</p> <ul style="list-style-type: none"> <li>(a) forecast expenditure by opex category in Workbook 1 – Regulatory determination, regulatory template 2.16 for standard control services opex and dual function asset opex in tables 2.16.2 and 2.16.4;</li> <li>(b) in Microsoft Excel format, reconciliation (including all calculations and formulae) of ActewAGL Distribution's total forecast opex proposal to forecast standard control services opex and dual function assets opex by opex category in Workbook 1 - Regulatory determination, regulatory template 2.16, tables 2.16.2 and 2.16.4;</li> <li>(c) explanation of major drivers for the increases and decreases in expenditure by opex category in the forthcoming regulatory control period compared to actual historical expenditure;</li> <li>(d) explanation and justification for: <ul style="list-style-type: none"> <li>(i) whether ActewAGL Distribution considers there is a year of historic opex that represents efficient and recurrent costs; or</li> </ul> </li> </ul>	Not applicable. Evoenergy uses the revealed cost base year approach.

GENERAL REQUIREMENTS		RESPONSE
	(ii) why ActewAGL Distribution considers no year of historic opex represents efficient and recurrent costs.	
<b>Output growth</b>		
10.5	Provide the amount of total forecast opex attributable to output growth changes for standard control services opex and dual function assets opex in Workbook 1 - Regulatory determination, regulatory template 2.16, tables 2.16.1 and 2.16.3.	Refer to Workbook 1, template 2.16, tables 2.16.1 and 2.16.3
10.6	Provide: <ul style="list-style-type: none"> <li>(a) the output growth drivers ActewAGL Distribution used to develop the amount of total forecast opex attributable to output growth changes;</li> <li>(b) any economies of scale factors applied to the growth drivers;</li> <li>(c) evidence that the growth drivers explain cost changes due to output growth; and</li> <li>(d) if ActewAGL Distribution applied any composite multiple output growth drivers: <ul style="list-style-type: none"> <li>(i) the inputs for each composite multiple output growth driver; and</li> <li>(ii) the weightings for each input;</li> </ul> </li> </ul>	Refer to Attachment 6: Operating expenditure; Modelling Appendix: Forecast SCS opex model
10.7	Provide an explanation of how, in developing the amount of total forecast opex attributable to output growth changes, ActewAGL Distribution: <ul style="list-style-type: none"> <li>(a) applied the output growth drivers; and</li> <li>(b) accounted for economies of scale.</li> </ul>	Refer to Attachment 6: Operating expenditure; Modelling Appendix: Forecast SCS opex model
<b>Real price changes</b>		
10.8	Provide the amount of total forecast opex attributable to changes in the price of labour and materials for standard control services opex and dual function assets opex in Workbook 1 - Regulatory determination, regulatory template 2.16, tables 2.16.1 and 2.16.3.	Refer to Workbook 1, template 2.16, tables 2.16.1 and 2.16.3
10.9	Provide an explanation of: <ul style="list-style-type: none"> <li>(a) how, in developing the amount of total forecast opex attributable to changes in the price of labour and materials, ActewAGL Distribution applied the real price measures in Workbook 1 – regulatory determination, regulatory template 2.14; and</li> </ul>	Refer to Attachment 6: Operating expenditure; Modelling Appendix: Forecast SCS opex model



GENERAL REQUIREMENTS		RESPONSE
	(b) whether ActewAGL Distribution's labour price measure compensates for any form of labour productivity change.	
<b>Productivity change</b>		
10.10	Provide the amount of total forecast opex attributable to changes in productivity for standard control services opex and dual function assets opex in Workbook 1 - Regulatory determination, regulatory template 2.16, tables 2.16.1 and 2.16.3.	Refer to Workbook 1, template 2.16, tables 2.16.1 and 2.16.3
10.11	Provide, in percentage year on year terms, the productivity measure that ActewAGL Distribution used to develop the amount of total forecast opex attributable to changes in productivity.	Refer to Attachment 6: Operating expenditure; Modelling Appendix: Forecast SCS opex model
10.12	Provide an explanation of: <ul style="list-style-type: none"> <li>(a) how, in developing the amount of total forecast opex attributable to changes in productivity, ActewAGL Distribution applied the productivity measure in paragraph 10.11;</li> <li>(b) whether ActewAGL Distribution's forecast productivity changes capture the historic trend of cost increases due to changes in regulatory obligations or requirements and industry best practice; and</li> <li>(c) whether ActewAGL Distribution's productivity measure includes productivity change compensated for by the labour price measure used by ActewAGL Distribution to forecast the change in the price of labour.</li> </ul>	Refer to Attachment 6: Operating expenditure; Modelling Appendix: Forecast SCS opex model
<b>11. STEP CHANGES</b>		
11.1	Provide the amount of total forecast opex attributable to opex step changes for standard control services opex and dual function assets opex in Workbook 1 - Regulatory determination, regulatory template 2.16, tables 2.16.1 and 2.16.3.	Refer to Workbook 1, template 2.16, tables 2.16.1 & 2.16.3
11.2	Provide an explanation of why ActewAGL Distribution considers: <ul style="list-style-type: none"> <li>(a) the efficient costs of the step change are not provided by other components of ActewAGL Distribution's total forecast opex such as base opex, output growth changes, real price changes or productivity change;</li> <li>(b) the total forecast opex will not allow ActewAGL Distribution to achieve the objectives in clause 6.5.6(a) of the NER unless the step change is included; and</li> </ul>	Refer to Attachment 6: Operating expenditure; Appendix 6.1: Vegetation management step change;



GENERAL REQUIREMENTS		RESPONSE
	(c) the total forecast opex will not reasonably reflect the criteria in clause 6.5.6(c) of the NER unless the step change is included.	Appendix 6.2: Strathnairn demand management step change
11.3	For all step changes in forecast expenditure provide: (a) In Workbook 1 – Regulatory determination, regulatory template 2.17 the quantum of the step changes: (i) forecasts for each year of the forthcoming regulatory control period; and (ii) expected to be incurred, in the current regulatory control period; (b) a description of the step change.	Refer to Workbook 1, template 2.17
11.4	For each step change listed in response to paragraph 11.3, provide an explanation of: (a) when the change occurred, or is expected to occur; (b) what the driver of the step change is; (c) how the driver has changed or will change (for example, revised legislation may lead to a change in a regulatory obligation or requirement); and (d) whether the step change is recurrent in nature.	Refer to Attachment 6: Operating expenditure; Appendix 6.1: Vegetation management step change; Appendix 6.2: Strathnairn demand management step change
11.5	For each step change listed in response to paragraph 11.3, provide justification for when, and how, the step change affected, or is expected to affect: (a) the relevant opex category; (b) the relevant capex category; (c) total opex; and (d) total capex;	Refer to Attachment 6: Operating expenditure; Appendix 6.1: Vegetation management step change; Appendix 6.2: Strathnairn demand management step change
11.6	For each step change listed in response to paragraph 11.3, provide the process undertaken by ActewAGL Distribution to identify and quantify the step change; provide cost benefit analysis that demonstrates ActewAGL Distribution proposes to address the step change in a prudent and efficient manner, including: (a) the timing of the step change; and	Refer to Attachment 6: Operating expenditure; Appendix 6.1: Vegetation management step change;

GENERAL REQUIREMENTS		RESPONSE
	(b) if ActewAGL Distribution considered a 'do nothing' option, evidence of how Actual assessed the risks of this option compared with other options;	Appendix 6.2: Strathnairn demand management step change
11.7	For each step change listed in response to paragraph 11.3, where the step change is due to a change in a regulatory obligation or requirement provide: (a) relevant variations or exemptions granted to ActewAGL Distribution during the previous regulatory control period or the current regulatory control period; (b) any relevant compliance audits ActewAGL Distribution conducted during the previous regulatory control period or the current regulatory control period;	Refer to Attachment 6: Operating expenditure; Appendix 6.1: Vegetation management step change; Appendix 6.2: Strathnairn demand management step change
11.8	For each step change listed in response to paragraph 11.7, provide, with reference to specific clauses of the relevant legislative instrument(s), the: (a) previous regulatory obligation or requirement; and (b) how the changed regulatory obligation or requirement is driving the step change.	Refer to Attachment 6: Operating expenditure; Appendix 6.1: Vegetation management step change; Appendix 6.2: Strathnairn demand management step change
<b>Category specific opex</b>		
11.9	Provide the amount of total forecast opex attributable to category specific opex in Workbook 1 – Regulatory determination, regulatory template 2.17, table 2.17.5. The amount of total opex attributable to category specific opex must correspond with the category specific opex reported in Workbook 1 - Regulatory determination, regulatory template 2.16, table 2.16.1.	Refer to Workbook 1, template 2.16, table 2.16.1 – corresponds to template 2.17
<b>ECONOMIC BENCHMARKING</b>		
<b>12. ECONOMIC BENCHMARKING</b>		

GENERAL REQUIREMENTS		RESPONSE
12.1	Complete the Workbook 1 – Regulatory determination, regulatory templates 3.1 to 3.7 in accordance with: (a) the ‘Economic Benchmarking RIN for distribution network service providers – Instructions and Definitions’ issued to ActewAGL Distribution on 28 November 2013, chapters 2 to 9; (b) paragraphs 12.2 to 12.10	Refer to Workbook 1, templates 3.1 to 3.7
12.2	The forecast revenue groupings in Workbook 1 – Regulatory determination, regulatory templates 3.1, tables 3.1.1 and 3.1.2 may be developed by trending forward actual historical revenue groupings in previous regulatory years. However: (a) Total revenues must equal the total forecast revenues proposed by ActewAGL Distribution in its regulatory proposal, and (b) Revenue groupings must reflect ActewAGL Distribution’s forecast demand for its services in the forthcoming regulatory control period in its regulatory proposal.	Refer to Workbook 1, template 3.1, tables 3.1.1 and 3.1.2
12.3	Information provided in Workbook 1 – Regulatory determination, regulatory templates 3.2, tables 3.2.1 and 3.2.2 must reflect ActewAGL Distribution’s cost allocation method.	Refer to Workbook 1, template 3.2, tables 3.2.1 & 3.2.2
12.4	RAB asset financial data in the Workbook 1 – Regulatory determination, regulatory template 3.3 must reconcile to that in ActewAGL Distribution’s regulatory proposal PTRM and RFM.	Refer to Workbook 1, template 3.3
12.5	The definition of a tree must be applied when completing the variables “Average number of trees per urban and CBD vegetation maintenance span” (DOEF0208) and “Average number of trees per rural vegetation maintenance span” (DOEF0209)	Variables completed in accordance with definition
12.6	In calculating responses to the variables DOEF0202 to DOEF0205, spans in the network service area where ActewAGL Distribution is not responsible for the vegetation management associated with the span are not to be counted.	Variables completed in accordance with instruction
12.7	“Total number of spans” (DOEF0205) does not include service line spans.	Data provided does not include service line spans
12.8	ActewAGL Distribution must report the route line length of feeders classified as either short rural or long rural divided by the total route feeder line length (this is the total feeder route line length for all CBD, urban, short rural and long rural feeders) against “Rural proportion” (DOEF0201).	The route line length of feeders has been classified in accordance with the RIN

GENERAL REQUIREMENTS		RESPONSE
12.9	For the purposes of calculating the "Route line length" variable (DOEF0301) or other variables measured in terms of route line length: (a) the length of service lines are not to be counted (b) the length of a span that shares multiple voltage levels is only to be counted once	Variables completed in accordance with instruction
12.10	All forecast variables in the Workbook 1 – Regulatory determination, regulatory templates 3.1 to 3.7 must align with those in ActewAGL Distribution's regulatory proposal. For the avoidance of doubt this includes forecast: (a) opex and capex; (b) maximum demand, energy delivery; (c) revenues; (d) quality of services variables including SAIDI and SAIFI; and (e) quantities of physical assets.	Refer to Workbook 1, templates 3.1 to 3.7
<b>ALTERNATIVE CONTROL SERVICES REPORTING</b>		
<b>13. ALTERNATIVE CONTROL SERVICES</b>		
13.1	The overheads relating to each alternative control service listed in paragraph 13.2 must be disclosed.	Refer to Attachment 14: Alternative control services; Modelling Appendix: Ancillary services cost build up model
13.2	Provide a list of all of the alternative control services that ActewAGL Distribution intends to provide to customers and levy charges for in the forthcoming regulatory control period.	Refer to Attachment 14: Alternative control services; Modelling Appendix: Ancillary services cost build up model

GENERAL REQUIREMENTS		RESPONSE
13.3	Provide a definition of each alternative control service listed in paragraphs 14, 15 and 16.	Refer to Attachment 14: Alternative control services; Modelling Appendix: Ancillary services cost build up model
13.4	For each alternative control service listed in paragraphs 14, 15 and 16, specify the charges applicable during each year of the current regulatory control period. Also include proposed charges for each year of the forthcoming regulatory control period.	Refer to Attachment 14: Alternative control services; Modelling Appendix: Ancillary services cost build up model
13.5	For each alternative control service listed in paragraphs 14, 15 and 16, specify the total revenue earned by ActewAGL Distribution in each year of the current regulatory control period and forecast to be earned in the forthcoming regulatory control period.	Refer to Attachment 14: Alternative control services; Modelling Appendix: Ancillary services cost build up model
13.6	For each alternative control service listed in paragraphs 14, 15 and 16, provide the labour rate(s) used to calculate the charges for the current and forthcoming regulatory control periods: (a) specify the labour classification level used to provide the services e.g. outsourced or internally provided and labourer type. (b) list all direct costs, and their quantum, in the make-up of the labour rate(s).	Refer to Attachment 14: Alternative control services; Modelling Appendix: Ancillary services cost build up model
13.7	List each material category (e.g. meters, poles, brackets) required for the provision of each alternative control service listed in the response to paragraphs 14, 15 and 16. (a) provide a description of each material category. (b) provide the average unit costs for each material category. (c) list all direct costs included in the unit costs. (d) specify the calculation of the quantum of direct materials costs included in the unit cost of materials.	Refer to Attachment 14: Alternative control services; Modelling Appendix: Ancillary services cost build up model

GENERAL REQUIREMENTS		RESPONSE
<b>14. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES</b>		
14.1	<p>Provide a description of each fee based and quoted service, explaining the purpose of the service and list the activities which comprise each service. The list of fee based and quoted services should be consistent with those services listed in ActewAGL Distribution's annual pricing proposals.</p> <ul style="list-style-type: none"> <li>(a) specify if the charges are for fee based and/or quoted alternative control services;</li> <li>(b) explain the reasons for the different charge with reference to the costs incurred;</li> <li>(c) explain the method used to set the different charge; and</li> <li>(d) provide the calculations underpinning the different charge.</li> </ul>	<p>Refer to Attachment 14: Alternative control services; Modelling Appendix: Ancillary services cost build up model</p>
14.2	<p>Identify the tasks involved in providing the service in Workbook 1 – Regulatory determination, regulatory templates 4.3 and 4.4.</p> <ul style="list-style-type: none"> <li>(a) map the class of labour required to provide the service listed in regulatory templates 4.3 and 4.4.</li> <li>(b) the number of workers required to undertake the task and deliver the service.</li> <li>(c) the average time required to complete the task and deliver the service.</li> </ul>	<p>Refer to Modelling Appendix: Ancillary services cost build up model</p>
14.3	<p>If materials are required to provide the service, specify each material category.</p>	<p>Refer to Modelling Appendix: Ancillary services cost build up model</p>
14.4	<p>Provide all current and proposed charges for each fee based and quoted alternative control service in the current and forthcoming regulatory control periods.</p>	<p>Refer to Attachment 14: Alternative control services</p>
<b>15. METERING ALTERNATIVE CONTROL SERVICES</b>		

GENERAL REQUIREMENTS		RESPONSE
15.1	<p>For metering alternative control services for the current regulatory control period and the forthcoming regulatory control period, provide details of the:</p> <ul style="list-style-type: none"> <li>(a) direct materials and direct labour costs;</li> <li>(b) installation costs;</li> <li>(c) meter purchase costs;</li> <li>(d) volumes of work;</li> <li>(e) other costs associated with providing metering services;</li> <li>(f) type of meters installed and forecast to be installed, separately for new meters and for replacement meters;</li> <li>(g) the volume of meters by type set out in (f) and the revenue earned and forecast to be earned by each meter type; and</li> <li>(h) the total operating and maintenance costs incurred, and forecast to be incurred, for metering services.</li> </ul>	<p>Refer to Attachment 14: Alternative control services; Modelling Appendix: Ancillary services cost build up model</p>
15.2	<p>For metering works, for each year of the current regulatory control period and forecasts for the forthcoming regulatory control period, provide a description of:</p> <ul style="list-style-type: none"> <li>(a) the labour costs involved in providing the service, including any overheads;</li> <li>(b) the labour costs involved in providing the service, including any overheads;</li> <li>(c) any materials costs involved in providing the service;</li> <li>(d) the number (volume) of services provided and associated assumptions on which the volume of service was derived or estimated;</li> <li>(e) the charge per service; and</li> <li>(f) the revenue earned by each service.</li> </ul>	<p>Refer to Attachment 14: Alternative control services; Modelling Appendix: Ancillary services cost build up model</p>
15.3	<p>For metering alternative control services, specify the number of customers in each year of the current regulatory control period, and forecasts for the forthcoming regulatory control period.</p>	<p>Refer to Attachment 14: Alternative control services; Modelling Appendix: Ancillary services cost build up model</p>
<b>16. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES</b> <b>[NOT APPLICABLE]</b>		Not applicable

GENERAL REQUIREMENTS		RESPONSE
NETWORK INFORMATION REPORTING		
17. DEMAND AND CONNECTIONS FORECASTS		
17.1	<p>Provide and describe the methodology used to prepare the following forecasts for the forthcoming regulatory control period:</p> <ul style="list-style-type: none"> <li>(a) maximum demand; and</li> <li>(b) number of new connections.</li> </ul>	<p>(a) Refer to Appendix 3.2: Peak demand forecast; Appendix 3.3: Demand forecasting update and support</p> <p>(b) Refer to Appendix 5.5: Customer initiated works report</p>
17.2	<p>Provide:</p> <ul style="list-style-type: none"> <li>(a) the model(s) ActewAGL Distribution used to forecast new connections and maximum demand;</li> <li>(b) where ActewAGL Distribution's approach to weather correction has changed, provide historically consistent weather corrected maximum demand data, as per the format in Workbook 1 – Regulatory determination, regulatory templates 3.4 and 5.4 using ActewAGL Distribution's current approach. If any of this data is unavailable, explain why;</li> <li>(c) for new connections, volume expenditure data requested in Workbook 1 – Regulatory determination, regulatory template 2.5; and</li> <li>(d) any supporting information or calculations that illustrate how information extracted from ActewAGL Distribution's forecasting model(s) reconciles to, and explains any differences from, information provided in Workbook 1 – Regulatory determination, regulatory templates 2.5, 3.4 and 5.4.</li> </ul>	<p>(a) Refer to Appendix 5.5: Customer initiated works report</p> <p>(b) No change in methodology</p> <p>(c)-(d) Refer to Workbook 1, templates 2.5, 3.4 and 5.4</p>
17.3	<p>For each of the methodologies provided and described in response to paragraph 17.1, and, where relevant, data requested under paragraphs 17.2(b) and 17.2(c), explain or provide (as appropriate):</p> <ul style="list-style-type: none"> <li>(a) the models used;</li> <li>(b) a global (top-down) and spatial (bottom-up) demand forecast;</li> <li>(c) the inputs and assumptions used in the models (including in relation to economic growth, connections numbers and policy changes and provide any associated models or data relevant to justifying these inputs and assumptions);</li> <li>(d) the weather correction methodology, how weather data has been used, and how ActewAGL Distribution's approach to weather correction has changed over time;</li> <li>(e) an outline of the treatment of block loads, transfers and switching within the forecasting process;</li> </ul>	<p>3(a) Refer to Appendix 3.2: Peak demand forecast; Appendix 5.5: Customer initiated works report</p> <p>(b)-(h) Refer to Appendix 3.2: Peak demand forecast; Appendix 3.3: Demand forecasting update and support</p>



GENERAL REQUIREMENTS	RESPONSE
<ul style="list-style-type: none"> <li>(f) each appliance model used, where used, or assumptions relating to average customer energy usage (by customer type);</li> <li>(g) how the forecasting methodology used is consistent with, and takes into account, historical observations (where appropriate), including any calibration processes undertaken within the model (specifically whether the load forecast is matched against actual historical load on the system and substations);</li> <li>(h) how the resulting forecast data is consistent across forecasts provided for each network element identified in Workbook 1 – Regulatory determination, regulatory template 5.4 and system wide forecasts;</li> <li>(i) how the forecasts resulting from these methods and assumptions have been used in determining the following: <ul style="list-style-type: none"> <li>(i) capex forecasts; and</li> <li>(ii) operating and maintenance expenditure forecasts.</li> </ul> </li> <li>(j) whether ActewAGL Distribution used the forecasting model(s) it used in the joint planning process for the purposes of its regulatory proposal;</li> <li>(k) whether ActewAGL Distribution's forecasts both coincident and non-coincident maximum demand at the feeder, connection point, sub-transmission substation and zone substation level, and how these forecasts reconcile with the system level forecasts (including how various assumptions that are allowed for at the system level relate to the network level forecasts);</li> <li>(l) whether ActewAGL Distribution records historic maximum demand in MW, MVA or both;</li> <li>(m) the probability of exceedance that ActewAGL Distribution uses in network planning;</li> <li>(n) the contingency planning process, in particular the process used to assess high system demand;</li> <li>(o) how risk is managed across the network, particularly in relation to load sharing across network elements and non-network solutions to peak demand events;</li> <li>(p) whether and how the maximum demand forecasts underlying the regulatory proposal reconcile with any demand information or related planning statements published by AEMO, as well as forecasts produced by any transmission network service providers connected to ActewAGL Distribution's network;</li> <li>(q) how the normal and emergency ratings are used in determining capacity for individual zone substations and sub-transmission lines;</li> <li>(r) where ActewAGL Distribution proposes to commence or continue a demand-related capex project or program during the forthcoming regulatory control period on a HV feeder: <ul style="list-style-type: none"> <li>(i) for each feeder from the zone substation that is the connecting zone substation for the relevant HV feeder, and any other feeders that the relevant HV feeder can transfer load to or from: <ul style="list-style-type: none"> <li>(A) assumed future load transfers between feeders;</li> <li>(B) assumed feeder underlying load growth rates (exclusive of transfers and specific customer developments); and</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>(i)(i) Refer to Attachment 5: Capital expenditure</li> <li>(i)(ii) As detailed in Attachment 6: Operating expenditure, Evoenergy has used growth in customer numbers and growth in ratcheted maximum demand (based on Non-coincident Summated Weather Adjusted System Annual Maximum Demand 10% POE) as inputs into its output growth forecast</li> <li>(j)-(o) Refer to Appendix 3.2: Peak demand forecast; Appendix 3.3: Demand forecasting update and support; Appendix 1.15: Annual planning report</li> <li>(p)-(q) Refer to Appendix 3.2: Peak demand forecast</li> <li>(r)-(s) Refer to Appendix 1.15: Annual planning report, various appendices including relevant project justification reports</li> </ul>

GENERAL REQUIREMENTS		RESPONSE
	<p>(C) assumed block loads, and associated demand assumptions;</p> <p>(ii) existing embedded generation capacity, and associated assumptions on the impact on demand levels;</p> <p>(iii) assumed future embedded generation capacity, and associated assumptions on the impact on demand levels;</p> <p>(iv) existing non-network solutions, and the associated assumptions on the impact on demand levels;</p> <p>(v) assumed future non-network solutions, and associated assumptions on the impact on demand levels; and</p> <p>(vi) the diversity between feeders;</p> <p>(s) where ActewAGL Distribution proposes to commence or continue a demand-related capex project or program during the forthcoming regulatory control period on a zone substation (or relevant substations for a sub-transmission line):</p> <p>(i) assumed future load transfers between related substations;</p> <p>(ii) assumed underlying load growth rates (exclusive of transfers and specific customer developments);</p> <p>(iii) assumed specific customer developments, and associated demand assumptions;</p> <p>(iv) existing embedded generation capacity, and associated assumptions on the impact on demand levels;</p> <p>(v) assumed future embedded generation capacity, and associated assumptions on the impact on demand levels;</p> <p>(vi) existing non-network solutions, and the associated assumptions on the impact on demand levels;</p> <p>(vii) assumed future non-network solutions, and associated assumptions on the impact on demand levels; and</p> <p>(viii) diversity with related substations.</p>	
17.4	<p>Provide:</p> <p>(a) evidence that any independent verifier engaged by ActewAGL Distribution has examined the reasonableness of the method, processes and assumptions in determining the forecasts and has sufficiently capable expertise in undertaking a verification of forecasts; and</p> <p>(b) all documentation, analysis and models evidencing the results of the independent verification.</p>	Refer to Appendix 3.2 Peak demand forecast; Appendix 3.3 Demand forecasting update and support
<b>INCENTIVE SCHEMES AND OTHER REPORTING</b>		
<b>18. EFFICIENCY BENEFIT SHARING SCHEME</b>		

GENERAL REQUIREMENTS		RESPONSE
18.1	<p>For the purposes of applying the efficiency benefit sharing scheme:</p> <ul style="list-style-type: none"> <li>(a) identify all cost categories proposed to be excluded from the operation of the efficiency benefit sharing scheme;</li> <li>(b) explain for each cost category identified in the response to paragraph 18.1(a) the reasons for the proposed exclusion.</li> </ul>	Refer to Attachment 10: Incentive schemes
<b>19. SERVICE TARGET PERFORMANCE INCENTIVE SCHEME</b>		
19.1	<p>Provide ActewAGL Distribution's detailed methodology for calculating the following parameters used in the STPIS;</p> <ul style="list-style-type: none"> <li>(a) the SAIDI, SAIFI and MAIFI targets for each supply reliability area;</li> <li>(b) the customer service parameters and targets;</li> <li>(c) daily SAIDI, SAIFI and MAIFI and customer service performance derived from the individual interruption data under paragraph 19.3;</li> <li>(d) the MED threshold derived from the daily SAIDI data;</li> <li>(e) The incentive rates to apply to each supply reliability area.</li> </ul> <p>Note: All calculations must be made in accordance with the STPIS and using data which complies with the STPIS definitions.</p>	<p>(a)-(c) Refer to Attachment 10: Incentive schemes; Appendix 10.1: Proposed STPIS performance targets</p> <p>(d) Major Event D thresholds are calculated based on the 2.5 beta method in accordance with Appendix D of the STPIS guideline</p> <p>(e) Refer to Attachment 10: Incentive schemes; Appendix 10.2: STPIS incentive rates</p>
19.2	<p>If ActewAGL Distribution proposes adjustments to the STPIS targets away from those based upon raw historical data ActewAGL Distribution must provide, in respect of each adjustment:</p> <ul style="list-style-type: none"> <li>(a) the reasons for the adjustment;</li> <li>(b) the quantum of the adjustment, and the effect of the adjustment on the targets for each of the supply reliability areas; and</li> <li>(c) the method, basis and empirical data used as justification for the adjustment.</li> </ul>	Not applicable
19.3	Provide the data required in Workbook 1 – Regulatory determination, regulatory templates 6.1 and 6.2.	Refer to Workbook 1, templates 6.1 and 6.2
<b>20. PROPOSED CONTINGENT PROJECTS</b>		

GENERAL REQUIREMENTS	RESPONSE
<p>20.1 For each contingent project proposed in the regulatory proposal, provide:</p> <ul style="list-style-type: none"> <li>(a) a description of the proposed contingent project, including reasons why ActewAGL Distribution considers the project should be accepted as a contingent project for the forthcoming regulatory control period;</li> <li>(b) the proposed contingent capex which ActewAGL Distribution considers is reasonably required for the purpose of undertaking the proposed contingent project;</li> <li>(c) the methodology used for developing that forecast and the key assumptions that underlie it;</li> <li>(d) information that demonstrates that the undertaking of the proposed contingent project is reasonably required to meet one or more of the objectives referred to in clause 6.6A.1(b)(1) of the NER;</li> <li>(e) a demonstration that the proposed contingent capex for each proposed contingent project: <ul style="list-style-type: none"> <li>(i) is not included (either in part or in whole) in ActewAGL Distribution's proposed total forecast capex for the forthcoming regulatory control period;</li> <li>(ii) reasonably reflects the capex criteria, taking into account the capex factors, in the context of the proposed contingent project; and</li> <li>(iii) exceeds either \$30 million (\$nominal) or 5 per cent of ActewAGL Distribution's proposed annual revenue requirement for the first year of the forthcoming regulatory control period, whichever is larger amount.</li> </ul> </li> <li>(f) the proposed trigger events relating to the proposed contingent project.</li> </ul>	<p>Not applicable. No contingent projects are proposed</p>
<p>20.2 For each proposed trigger event relating to the proposed contingent project referred to in paragraph 20.1(f), demonstrate:</p> <ul style="list-style-type: none"> <li>(a) the proposed trigger event is reasonably specific and capable of objective verification;</li> <li>(b) the occurrence of the proposed trigger event makes the undertaking of the proposed contingent project reasonably necessary in order to achieve any of the capex objectives;</li> <li>(c) the proposed trigger event generates increased costs or categories of costs that relate to a specific location rather than a condition or event that affects the network as a whole;</li> <li>(d) the proposed trigger event is described in such terms that the occurrence of that event or condition is all that is required for the distribution determination to be amended under clause 6.6A.2 of the NER;</li> <li>(e) the proposed trigger event is a condition or event, the occurrence of which is probable during the forthcoming regulatory control period, but the inclusion of capex in relation to the proposed trigger event under clause 6.5.7 of the NER is not appropriate because: <ul style="list-style-type: none"> <li>(iv) it is not sufficiently certain that the event or condition will occur during the forthcoming regulatory control period or if it may occur after that regulatory control period or not at all; or</li> <li>(v) the costs associated with the event or condition are not sufficiently certain.</li> </ul> </li> </ul>	<p>Not applicable</p>

GENERAL REQUIREMENTS		RESPONSE
20.3	Provide a summary of ActewAGL Distribution's proposed contingent projects for the forthcoming regulatory control period, including the proposed contingent capex and trigger events for each proposed contingent project in the Workbook 1 – Regulatory determination, regulatory template 7.2.	Not applicable
<b>21. REVENUES FOR STANDARD CONTROL SERVICES</b>		
21.1	Provide ActewAGL Distribution's calculation of the unsmoothed and smoothed revenues for each year of the forthcoming regulatory control period using the AER's post-tax revenue model, which is to be submitted as part of ActewAGL Distribution's regulatory proposal.	Refer to Attachment 12: Revenue requirement; Modelling Appendix: Distribution PTRM and Transmission PTRM
21.2	Provide details of any departure from the AER's post-tax revenue model for the calculations referred to in paragraph 21.1 and the reasons for that departure.	No departures from the AER's post-tax revenue model
<b>22. INDICATIVE IMPACT ON ANNUAL ELECTRICITY BILLS</b>		
22.1	For the purposes of calculating the impact of ActewAGL Distribution's regulatory proposal on the annual electricity bill of typical residential and business customers in Australian Capital Territory, provide the data/information required in Workbook 1 – Regulatory determination, regulatory template 7.6. Provide the data source for each input used for the calculation.	Refer to Workbook 1, template 7.6; RIN Appendix 8: Basis of preparation
<b>23. PROPOSED TARIFF STRUCTURE STATEMENT</b>		
23.1	Provide the model(s) used to calculate the long run marginal cost estimates in ActewAGL Distribution's proposed tariff structure statement provided in accordance with the requirements of clauses 6.18.1A(a)(5) and 6.18.5(f) of the NER.	Refer to Modelling appendix: LRMC model
23.2	Provide and describe the methodology and assumptions used to prepare the long run marginal cost estimates in paragraph 23.1.	Refer to Appendix 17.2 Proposed Tariff Structure Statement – Detailed Methodology

GENERAL REQUIREMENTS		RESPONSE
23.3	Describe the relationship between the expenditure, demand and other inputs (as appropriate) used in the model provided under paragraph 23.1 and the expenditure, demand and other forecasts (as appropriate) provided as part of the building block proposal for the forthcoming regulatory control period.	Refer to Appendix 17.2: Proposed Tariff Structure Statement – Detailed Methodology
<b>24. REGULATORY ASSET BASE</b>		
24.1	Provide ActewAGL Distribution's calculation of the regulatory asset base for the relevant distribution system in respect of standard control services for each regulatory year of current regulatory control period using the AER's roll forward model, which is to be submitted as part of the regulatory proposal.	Refer to Attachment 7: Regulatory Asset Base; Modelling Appendix: Distribution RFM and Transmission RFM
24.2	Provide details of each departure from the underlying methods in the AER's roll forward model for the calculation referred to in paragraph 24.1 and the reasons for that departure.	No departures
24.3	If the value of the regulatory asset base as at the start of the forthcoming regulatory control period is proposed to be adjusted because of changes to asset service classification, provide details including relevant supporting information used to calculate that adjustment value.	No adjustments
24.4	Provide details of any departure in the allocation of actual capex, asset disposal and customer contribution values across asset classes in the roll forward model from those reported in the Annual Reporting RIN for the relevant regulatory years and the reasons for that departure.	No departures
<b>25. DEPRECIATION SCHEDULES</b>		
25.1	Provide ActewAGL Distribution's calculation of the depreciation amounts for the relevant distribution system in respect of standard control services for each regulatory year of: <ul style="list-style-type: none"> <li>(a) the current regulatory control period using the AER's roll forward model, which is to be submitted as part of the regulatory proposal</li> <li>(b) the forthcoming regulatory control period using the AER's post-tax revenue model, which is to be submitted as part of the regulatory proposal.</li> </ul>	<ul style="list-style-type: none"> <li>(a) Refer to Attachment 7: Regulatory Asset Base; Modelling Appendix: Distribution RFM and Transmission RFM</li> <li>(b) Refer to Attachment 7: Regulatory Asset Base;</li> </ul>

GENERAL REQUIREMENTS		RESPONSE
		Modelling Appendix: Distribution PTRM and Transmission PTRM
25.2	Provide details of any departure from the underlying methods in the AER's roll forward model and post-tax revenue model for the calculations referred to in paragraph 25.1 and the reasons for that departure.	No departures
25.3	Identify any changes to standard asset lives for existing asset classes from the previous determination. Explain the reason(s) for each change and provide supporting information.	No changes
25.4	Identify any changes to new asset classes from the previous determination. Explain the reason(s) for using these new asset classes and provide supporting information on their proposed standard asset lives.	No changes
25.5	If any existing asset classes from the previous determination are proposed to be removed and their residual values to be reallocated to other asset classes, explain the reason(s) for the change and provide supporting information. This should include a demonstration of the materiality of the change on the forecast depreciation allowance.	No changes
25.6	Describe the method used to depreciate existing asset classes as at 1 July 2019 (the start of the forthcoming regulatory control period) and provide supporting calculations, if the approach differs from that in the roll forward model.	Refer to Attachment 7: Regulatory Asset Base
<b>26. CORPORATE TAX ALLOWANCE</b>		
26.1	Provide ActewAGL Distribution's calculation of the estimated cost of corporate income tax for the forthcoming regulatory control period using the AER's post-tax revenue model, which is to be submitted as part of the regulatory proposal.	Refer to Attachment 9: Corporate Income Tax; Modelling Appendix: Distribution PTRM and Transmission PTRM
26.2	Provide details of each departure from the AER's post-tax revenue model for the calculations referred to in paragraph 26.1 and the reasons for that departure.	No departures
26.3	Identify each change to standard tax asset lives for existing asset classes from the previous determination. Explain the reason(s) for the change and provide relevant supporting information, including Federal tax laws governing depreciation for tax purposes.	No changes

GENERAL REQUIREMENTS		RESPONSE
26.4	Describe the method used to depreciate existing asset classes as at 1 July 2019 (the start of the forthcoming regulatory control period) and provide supporting calculations, if the approach differs from that in the roll forward model.	No changes
26.5	Provide ActewAGL Distribution's calculation of the tax asset base for the relevant system in respect of standard control services for each regulatory year of the current regulatory control period using the AER's roll forward model, which is to be submitted as part of the regulatory proposal.	Refer to Attachment 9: Corporate Income Tax; Modelling Appendix: Distribution RFM and Transmission RFM
26.6	Provide details of each departure from the underlying methods in the AER's roll forward model for the calculation referred to in paragraph 26.5 and the reasons for that departure.	No departures
26.7	Identify each difference in the capitalisation of expenditure for regulatory accounting purposes and tax accounting purposes. Provide reasons and supporting calculations to reconcile any differences between the two forms of accounts.	No changes
<b>MISCELLANEOUS REPORTING</b>		
<b>27. RELATED PARTY TRANSACTIONS</b>		
27.1	Identify and describe all entities which: <ul style="list-style-type: none"> <li>(a) are a related party to ActewAGL Distribution and contribute to the provision of distribution services; or</li> <li>(b) have the capacity to determine the outcome of decisions about ActewAGL Distribution's financial and operating policies.</li> </ul>	(a) The ActewAGL Distribution partnership and the ActewAGL Retail partnership share Icon Water Ltd as a parent via Icon Water's subsidiary companies Icon Retail Investments Ltd and Icon Distribution Investments Ltd, respectively. The ActewAGL Retail partnership is the only related party that also contributes to the provision of distribution services. This occurs via a Service Level Agreement. This arrangement is currently



GENERAL REQUIREMENTS		RESPONSE
		<p>being concluded and expires on 30 June 2019.</p> <p>(b) No entity, apart from ActewAGL Distribution itself, has the capacity to determine the outcome of decisions about ActewAGL Distribution's financial and operating policies.</p>
27.2	Provide a diagram of the organisational structure depicting the relationships between all the entities identified in the response to paragraph 27.1.	Refer to Overview of regulatory proposal, Figure 1
27.3	<p>Identify:</p> <p>(a) all arrangements or contracts between ActewAGL Distribution and any of the other entities identified in the response to paragraph 27.1 currently in place or expected to be in place during the period 2017-18 to 2023-24 which relate directly or indirectly to the provision of distribution services; and</p> <p>(b) the service or services that are the subject of each arrangement or contract.</p>	<p>(a) A Service Level Agreement with the ActewAGL Retail partnership outlined in response to 27.1(a) is currently in place but is currently being concluded and will expire on 30 June 2019. This agreement is not expected to be renewed for the reason that marketing and corporate communications services, the subject of the agreement, are no longer performed within ActewAGL Retail. The services are performed within ActewAGL Distribution.</p> <p>(b) Marketing and corporate communications services and customer services.</p>

27.4	<p>For each service identified in the response to paragraph 27.3(b):</p> <p>(a) provide:</p> <ul style="list-style-type: none"> <li>(i) a description of the process used to procure the service; and</li> <li>(ii) supporting documentation including, but not limited to, requests for tender, tender submissions, internal committee papers evaluating the tenders, contracts between ActewAGL Distribution and the relevant provider;</li> </ul> <p>(b) explain:</p> <ul style="list-style-type: none"> <li>(i) why that service is the subject of an arrangement or contract (i.e. why it is outsourced) instead of being undertaken by ActewAGL Distribution itself;</li> <li>(ii) whether the services procured were provided under a standalone contract or provided as part of a broader operational agreement (or similar);</li> <li>(iii) whether the services were procured on a genuinely competitive basis and if not, why; and</li> <li>(iv) whether the service (or any component thereof) was further outsourced to another provider.</li> </ul>	<p>(a)(i) The ActewAGL Joint Venture Partnership was established in 2000 as a multi-utility provider of distribution and retail energy services in the ACT and region to secure available economies of scope and scale required to operate in the NEM. The model of service provision within ActewAGL has evolved over the operation of the NEM into an arrangement for sharing of corporate services and business IT services across the group.</p> <p>(a)(ii) Refer to RIN Appendix 15 - Marketing and customer services SLA</p> <p>(b)(i) See answer to 27.4(a)(i). The current Service Level Agreement will expire on 30 June 2019 is not expected to be renewed for the reason that the marketing and communications services are no longer provided by ActewAGL Retail, but instead will be sourced within ActewAGL Distribution.</p> <p>(b)(ii) The Service Level Agreement: Customer support and marketing services is an operational agreement within the ActewAGL group setting out with the provision of marketing</p>
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GENERAL REQUIREMENTS		RESPONSE
		<p>and corporate communications services, and customer services.</p> <p>(b)(iii) See answer to 27.4(a)(i).</p> <p>(b)(iv) The agreement does not preclude further outsourcing of services in the context of managing the total portfolio of marketing and corporate communications and customer services subject to the efficient matching of in-house capacity to business requirements.</p>
<b>28. VEGETATION MANAGEMENT COMPLIANCE</b>		
28.1	Provide compliance audits of vegetation management work conducted by ActewAGL Distribution during the current regulatory control period.	<p>Refer to RIN Appendix 9: Vegetation report 1 ( sample report); RIN Appendix 10: vegetation report 2 ( sample report); RIN Appendix 14: Vegetation management report 3 (sample report)</p>
<b>29. CORPORATE STRUCTURE</b>		
29.1	<p>Provide charts that set out:</p> <p>(a) the group corporate structure of which ActewAGL Distribution is a part; and</p> <p>(b) the organisational structure of ActewAGL Distribution.</p>	<p>(a) Refer to Overview of the regulatory proposal</p> <p>(b) Refer to RIN Appendix 2: Supplementary information</p>
<b>30. FORECAST MAP OF DISTRIBUTION SYSTEM</b>		

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30.1	Provide a forecast map of ActewAGL Distribution's distribution system for the forthcoming regulatory control period. This map, together with any appropriate accompanying notes, should also indicate the location of new major network assets proposed to be constructed over the forthcoming regulatory control period.	Refer to Overview of the regulatory proposal; Appendix 1.15 Annual planning report
<b>31. TRANSITIONAL ISSUES</b>		
31.1	Provide information on transitional issues (expressly identified in the NER or otherwise) which ActewAGL Distribution expects will have a material impact on it and should be considered by the AER in making its distribution determination. For each issue, set out the following information: (a) the transitional issue; (b) what has caused the transitional issue; (c) how the transitional issue impacts on ActewAGL Distribution; and (d) how ActewAGL Distribution considers the transitional issue could be addressed.	Nil
<b>32. AUDIT AND REVIEW REPORTS</b>		
32.1	Provide the audit report and review reports as applicable, prepared in accordance with the requirements set out in Appendix C.	Evoenergy has not provided an audit report and/or review report for the reset RIN response attached to this regulatory proposal.  Schedule 2, section 1.4 prescribes the use of an auditor to prepare an audit report and review reports in accordance with the requirements of Appendix C.  Appendix C, section 1.1 prescribes the requirements for audits of historical information.

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		<p>Section 1.2 further prescribes that no further independent audit or review is required of information that has previously been audited and is not materially altered by changes to the cost allocation method (CAM). All historical data provided in this RIN submission has not changed from previous annual RINs submitted to the AER. Evoenergy has not changed its CAM from the current regulatory period.</p> <p>Section 1.3 explicitly prescribes that forecast information is not subject to audit and review requirements.</p> <p>On that basis, Evoenergy considers that it complies with the requirements.</p>
32.2	Provide all reports from the auditor to ActewAGL Distribution's management regarding the audit review and/or auditors' opinions or assessment.	Not applicable. See response to 32.1
<b>33. CONFIDENTIAL INFORMATION</b>		
33.1	<p>This clause applies to any information ActewAGL Distribution provides:</p> <ul style="list-style-type: none"> <li>(a) in response to Schedule 1;</li> <li>(b) in a regulatory proposal for the forthcoming regulatory control period (a Proposal)</li> <li>(c) in a revision or amendment to a Proposal; and</li> </ul>	Refer to RIN Appendix 12: Confidentiality claim

GENERAL REQUIREMENTS		RESPONSE
	(d) in a submission ActewAGL Distribution makes regarding a Proposal or a revised or amended Proposal; (together, ActewAGL Distribution's Information).	
33.2	If ActewAGL Distribution wishes to make a claim for confidentiality over any of ActewAGL Distribution's Information, provide the details of that claim in accordance with the requirements of the AER's Confidentiality Guideline, as if it extended and applied to that claim for confidentiality.	Refer to RIN Appendix 12: Confidentiality claim
33.3	Provide any details of a claim for confidentiality in response to paragraph 33.2 at the same time as making the claim for confidentiality.	Refer to RIN Appendix 12: Confidentiality claim
<b>34. COMPLIANCE WITH SECTION 71YA OF THE NEL</b>		
34.1	<p>Provide a statement attesting that:</p> <p>(a) Where any expenditure or cost has been incurred or is forecast to be incurred by ActewAGL Distribution, as a result of or incidental to a review under Division 3A - Merits review and other non-judicial review - of the NEL:</p> <p>(i) ActewAGL Distribution has not included any of that expenditure or cost, or any part of that expenditure or cost, in its capital or operating expenditures for a network revenue or pricing determination; and</p> <p>(ii) ActewAGL Distribution has not recovered any of that expenditure or cost, or any part of that expenditure or cost, from end users; and</p> <p>(iii) ActewAGL Distribution has not sought to pass through any of that expenditure or cost, or any part of that expenditure or cost, to end users; or</p> <p>(b) Where no expenditure or cost has been incurred or is forecast to be incurred by ActewAGL Distribution, as a result of or incidental to a review under Division 3A - Merits review and other non-judicial review - of the NEL:</p> <p>(i) No such expenditure or cost has been incurred or is forecast to be incurred.</p>	<p>Refer to RIN Appendix 2: Supplementary information</p> <p>(a) While Evoenergy has previously incurred expenditure or costs as a result of or incidental to a review under Div 3A of the NEL, none is incurred or forecast in the base year (2017/18), or as a step change</p> <p>(a)(i) Evoenergy has not included any expenditure or cost incurred as a result of, or incidental to, a review under Division 3A of the NEL or any part of that expenditure or cost, in its capital or operating expenditures for a network revenue or pricing determination</p> <p>(a)(ii) Evoenergy has not recovered any such expenditure</p>

GENERAL REQUIREMENTS		RESPONSE
		<p>or cost, or any part of that expenditure or cost, from end users</p> <p>(a)(iii) Evoenergy has not sought to pass through any of that expenditure or cost, or any part of that expenditure or cost, to end users</p> <p>(b) Not applicable. See response to 34.1(a)</p>
<b>35. IDENTIFICATION OF CERTAIN COSTS IN ACTUAL CAPITAL AND OPERATING EXPENDITURE</b>		
35.1	For any actual capex or opex reported in response to this notice, identify any part of that expenditure which can be attributed to any expenditure or cost that ActewAGL Distribution has incurred as a result of, or incidental to, a review under Division 3A - Merits review and other non-judicial review - of the NEL.	<p>Refer to RIN Appendix 2: Supplementary information</p> <p>No part of actual capex or opex reported in response to this notice can be attributed to any expenditure or cost that Evoenergy incurred as a result of, or incidental to, a review under Division 3A of the NEL</p>