

**First Proposed**

**Electricity Transmission Network Service Providers**

**Submission Guidelines**

**EXPLANATORY STATEMENT AND ISSUES PAPER**

January 2007



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# 1 Introduction

The Australian Energy Regulator (AER) is responsible for regulating the revenues of transmission network service providers (TNSPs) in the National Electricity Market in accordance with the National Electricity Rules (the NER).

This Explanatory Statement accompanies the First Proposed Submission Guidelines (proposed guidelines) and provides the AER's reasons for the proposed guidelines. It has been prepared to satisfy the AER's obligations under clauses 11.6.17(c), and 6A.20(b)(2) and (3) of the NER.

The AER has also prepared a discussion paper which forms part of this Explanatory Statement, which provides additional information and requests written submissions on specific issues.

## 2 National Electricity Rules requirements

Clause 6A.10.2 of the NER requires the AER to publish the Submission Guidelines by 28 September 2007.

Under clause 11.6.17, the AER must also publish proposed guidelines on or before 31 January 2007. These proposed guidelines will apply to SP AusNet, VENCORP and ElectraNet for any transmission determination made in 2008 and will be used by the AER to develop the proposed guidelines that will apply to all other TNSPs in future regulatory periods.

## 3 Purpose and objectives of the proposed guidelines

These proposed guidelines set out the information that must be provided by a TNSP in a Revenue Proposal and a negotiating framework that it submits to the AER. The objectives of the proposed guidelines are to:

- contribute to the national electricity market objective
- be consistent with the principles in the NER
- promote transparency in the information provided by a TNSP and the decisions made by the AER and
- assist in the setting of efficient capital and operating expenditure allowances.

## **4 The nature and reasons for the proposed guidelines**

The proposed guidelines are essentially based on the AER's existing Information Requirement Guidelines, but modified in light of the AEMC's review of Chapter 6 of the National Electricity Rules, resulting in the new Chapter 6A.

The proposed guidelines primarily formalise the existing practices in relation to the submission of a revenue proposal. The proposed guidelines:

- Detail a series of principles relevant to a TNSP's preparation of historic and forecast information for the purposes of its revenue proposal and proposed negotiating framework;
- Detail the required contents of a TNSP's revenue proposal for its prescribed transmission services and the timing and basis for submitting this proposal to the AER;
- Detail the required contents of a TNSP's proposed negotiating framework that sets out the procedure to be followed in relation to negotiations between the TNSP and a service applicant who wishes to receive negotiated transmission services from the TNSP; and
- Contain a series of pro forma statements that a TNSP must use in providing the information required in its revenue proposal to the AER. These pro forma statements relate to: historic and forecast operating and capital expenditure; the weighted average cost of capital; depreciation; and the parameters for the performance incentive and efficiency benefit sharing schemes.

The proposed guidelines promote the NEM Objective by detailing the required basis for a TNSP preparing and submitting to the AER its revenue proposal in relation to its prescribed transmission services and its proposed negotiating framework for its negotiated transmission services. The Submission Guidelines require the TNSP to provide in these documents the minimum information requirements specified in the Rules and additional information requirements specified by the AER.

## **5 Consultation process**

The AER anticipates that it will engage in the following consultation process:

- publish the proposed guidelines, this Explanatory Statement and additional material, inviting written submissions
- consider any written submissions received during consultation
- publish the final Guidelines.

## **6 Invitation for written submissions**

Interested parties are invited to make written submissions to the AER, having regard to the issues outlined in the discussion paper on the proposed guidelines. The processes for consultation are also outlined therein.



# **Attachment 1**

**Australian Energy Regulator**

**First Proposed Transmission  
Network Service Provider  
Submission Guidelines**

**Issues Paper**

January 2007





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## Summary

Clause 6A.10.2 of the National Electricity Rules (NER) gives the Australian Energy Regulator (AER) authority to make Submission Guidelines in relation to the Revenue Proposal and negotiating framework that Transmission Network Service Providers (TNSPs) must submit to the AER.

The AER has prepared First Proposed Submission Guidelines to meet the specific requirements of the NER. Once finalised, the AER intends that, in accordance with the NER, the Submission Guidelines, and the Information Guidelines and Cost Allocation Guidelines that it is preparing, will replace its existing Information Requirements Guidelines, issued June 2002.

The First Proposed Submission Guidelines:

- Identify the AER's authority under the NER to make Submission Guidelines and detail the nature, role and objectives of the Guidelines, including the need to promote the National Electricity Market Objective under section 7 of the National Electricity Law (NEL).
- Detail a series of principles relevant to a TNSP's preparation of historic and forecast information for the purposes of its Revenue Proposal and proposed negotiating framework.
- Detail the required contents of a TNSP's Revenue Proposal for its prescribed transmission services and the timing and basis for submitting this proposal to the AER.
- Detail the required contents of a TNSP's proposed negotiating framework that sets out the procedure to be followed in relation to negotiations between the TNSP and a service applicant who wishes to receive negotiated transmission services from the TNSP.
- Contain a series of pro forma statements that a TNSP must use in providing the information required in its Revenue Proposal to the AER. These pro forma statements relate to: historic and forecast operating and capital expenditure; the weighted average cost of capital; depreciation; and the parameters for the performance incentive and efficiency benefit sharing schemes.

The AER is seeking comment from interested parties on the considerations, and specific questions identified, in this Issues Paper as well as on the detail of the First Proposed Submission Guidelines themselves. In particular, interested parties' views are sought on whether the First Proposed Submission Guidelines are appropriate given the requirements of the NER and the NEL and whether they should contain any additional information requirements.



# **1 Introduction**

## **1.1 Nature and purpose of the Submission Guidelines**

The Submission Guidelines are essentially based on the AER's existing Information Requirement Guidelines, but modified in light of the new Chapter 6A of the National Electricity Rules.

The new Submission Guidelines primarily formalise the existing practices in relation to the submission of a Revenue Proposal. However, there are some new elements in the Submission Guidelines, namely:

- a new series of detailed pro forma templates for use by TNSP's in providing information for Revenue Proposals and
- a requirement to provide a negotiating framework, in relation to the provision of contestable services.

## **1.2 Purpose of this Issues Paper**

The purpose of this Issues Paper is to examine the key issues relevant to the AER's development of new Submission Guidelines for the electricity transmission sector and to invite interested parties to comment on these Guidelines.

## **1.3 Structure of this Issues Paper**

The remainder of this document is structured as follows:

- section 2 examines the regulatory framework for the development of new Submission Guidelines
- section 3 discusses the contents of the AER's First Proposed Submission Guidelines and
- section 4 lists the questions on which interested parties' specific comments have been sought in sections 2 and 3.

## **1.4 Related AER projects**

Chapter 6A of the NER requires six new guidelines, including the Submission Guidelines, to be published by 31 January 2007. The other new guidelines are the Information Guidelines, Cost Allocation Guidelines, Ring Fencing Guidelines and arrangements for the Efficiency Benefits Sharing Scheme and the Service Target Performance Incentive Scheme, which also take the form of a guideline. The AER must also prepare a Post-Tax Revenue Model (PTRM) and an asset base Roll Forward Model (RFM) under the NER.

## **1.5 Request for submissions**

Comments are sought from interested parties on the scope of the AER's considerations, and on the specific questions identified, in this Issues Paper. Section 4 provides a consolidated list of the questions on which interested parties' specific comments have been sought throughout the rest of this Issues Paper.

In addition, interested parties are invited to comment on the First Proposed Submission Guidelines themselves, which have been developed in conjunction with this Issues Paper.

Submissions can be sent electronically to [aer inquiry@aer.gov.au](mailto:aer inquiry@aer.gov.au). Alternatively, written submissions can be sent to:

First Proposed Guidelines  
Australian Energy Regulator  
GPO Box 520  
Melbourne VIC 3001  
Ph: (03) 9290 1444  
Fax: (03) 9290 1457

Submissions should be received by 1 May 2007.

## **2 The regulatory framework**

### **2.1 Existing Information Requirements Guidelines**

The AER's existing Information Requirements Guidelines contain general principles that TNSPs must apply, and requirements for information that TNSPs must provide to the AER, in relation to cost allocation, annual regulatory reporting and setting revenue caps.

In relation to setting a TNSP's revenue cap, the existing Guidelines require a TNSP to provide the following information to the AER at least eight months before the current regulatory period expires:

- Forecast financial information for a minimum of five years from the start of a TNSP's next regulatory period. This information is to be provided by way of a series of pro forma statements covering: rate of return; initial regulatory assets; forecast capital expenditure; forecast customer contributions; forecast asset disposals and retirements; forecast operations and maintenance expenditure; and asset roll forward information.
- Historic financial information as specified by the AER, including the TNSP's most recent accounts and information to enable the transparent roll forward of the TNSP's regulated asset base.
- Demand forecasts for the next regulatory period, including the assumptions on which the demand forecast information has been based.
- A forecast map of the network, and accompanying notes, for the forthcoming regulatory period.

In accordance with the requirements of the new Chapter 6A Rules, the AER intends to replace the existing Information Requirements Guidelines with new:

- Cost Allocation Guidelines
- Information Guidelines and
- Submission Guidelines.

### **2.2 The National Electricity Rules**

Chapter 6A of the National Electricity Rules was promulgated on 16 November 2006 and set out various requirements relevant to the AER's preparation of new Submission Guidelines and to a TNSP's submission of its Revenue Proposal and negotiating framework to the AER for approval. In particular, the NER include requirements for:

- the AER preparing its First Proposed Submission Guidelines for comment by 31 January 2007

- the AER including certain information in its Submission Guidelines
- a TNSP including certain information in its Revenue Proposal to the AER
- a TNSP including certain information in its negotiating framework
- a TNSP submitting or resubmitting a Revenue Proposal, revised Revenue Proposal, proposed negotiating framework or accompanying information to the AER and
- the disclosure of information in the Revenue Proposal and the treatment of confidential information.

Each of these matters is addressed in the First Proposed Submission Guidelines and is discussed further below.

Clause 6A.20 of the NER also details the transmission consultation procedures that the AER must follow in developing, amending or reviewing its Guidelines, including the Submission Guidelines.

### **2.3 Timing and process—transitional guidelines**

A separate transitional consultation process has been undertaken with SP AusNet, VENCORP and ElectraNet. These businesses have revenue resets that commence in the first half of 2007 and require relevant guidelines to be ready prior to submitting their Revenue Proposals and proposed negotiating frameworks to the AER in February—March and June 2007. This, however, is before the guidelines are finalised by the AER under the NER in September 2007. Accordingly, a separate set of transitional guidelines have been issued to these businesses for use in their next resets in 2007-08 following a separate consultation process in December 2006 and January 2007 with these businesses. These transitional guidelines are essentially the same and have been released at the same time as the first proposed guidelines, which will be the subject of the further process set out in this paper.



### **3 First Proposed Submission Guidelines**

This section discusses the contents of the AER’s First Proposed Submission Guidelines under each of the main headings used in these Guidelines.

#### **3.1 Nature and authority**

Section 1 of the First Proposed Submission Guidelines identifies the AER’s authority under clause 6A.10.2 of the NEL for making the Guidelines.

This section also details the nature, role and objectives of the Guidelines, which have been designed to promote the NEM Objective under section 7 of the NEL, which provides that:

The national electricity market objective is to promote efficient investment in, and efficient use of, electricity services for the long term interests of consumers of electricity with respect to price, quality, reliability and security of supply of electricity and the reliability, safety and security of the national electricity system.

The First Proposed Submission Guidelines promote the NEM Objective by detailing the required basis for a TNSP preparing and submitting to the AER its Revenue Proposal in relation to its prescribed transmission services and its proposed negotiating framework for its negotiated transmission services. The Submission Guidelines require the TNSP to provide in these documents the minimum information requirements specified in the NEL and additional information requirements specified by the AER.

The AER will assess a TNSP’s Revenue Proposal in order to make a revenue cap determination and will also assess a TNSP’s proposed negotiating framework in order to make a negotiating framework determination.

In giving effect to the NEM Objective through the new Submission Guidelines, the AER will be seeking to:

- promote transparency in:
  - the information provided by TNSPs so that the AER can adequately understand each business that it is regulating
  - the decisions made by the AER and
- set efficient capital and operating expenditure allowances in its revenue cap determinations.

## 3.2 General principles

Section 2 of the First Proposed Submission Guidelines details a series of general principles relevant to a TNSP's preparation of both historic and forecast information for the purposes of its Revenue Proposal and its proposed negotiating framework. In particular, this section:

- requires a TNSP to comply with the requirements of the Submission Guidelines
- sets out the basis for a TNSP selecting, applying, disclosing and changing the accounting principles and policies that it uses for the purposes of its Revenue Proposal and proposed negotiating framework
- requires a TNSP to allocate its costs in accordance with the Cost Allocation Methodology that is approved by the AER under the Cost Allocation Guidelines
- requires that, in providing regulatory information to the AER, a TNSP must report the commercial substance of transactions and events, apply a defined standard of materiality and ensure that information is verifiable
- requires a TNSP to comply with any written request by the AER for ad hoc information
- details the basis on which the AER may require any information provided as part of a TNSP's Revenue Proposal to be audited and the responsibilities of both the TNSP and the auditor in relation to the conduct of any such audit
- reflects the requirements of clauses S6A.1.1(5) and S6A.1.2(6) of the NER for a TNSP's Revenue Proposal to be accompanied by a directors' responsibility statement and
- details the format in which a TNSP must submit its Revenue Proposal and proposed negotiating framework to the AER.

*Q1. Are the proposed general principles to be applied to historic and forecast information appropriate? Should any other principles be reflected into the Submission Guidelines?*

## 3.3 Forecast information principles

Section 3 of the First Proposed Submission Guidelines details a series of principles relevant to a TNSP's preparation of forecast information for the purposes of its Revenue Proposal and its proposed negotiating framework. In particular, this section:

- requires a TNSP to provide the AER with details of the assumptions supporting, and the basis for preparing, forecast information and

- details the nature of the mandatory account headings that a TNSP must use for its forecast information and the circumstances in which discretionary headings may be used and varied.

*Q2. Are the proposed general principles to be applied to forecast information appropriate? Should any other principles be reflected into the Submission Guidelines?*

### **3.4 Revenue Proposal**

Section 4 of the First Proposed Submission Guidelines details the required contents of a TNSP's Revenue Proposal for its prescribed transmission services and the timing and basis for the submission of this proposal to the AER. In particular, this section of the Guidelines requires that a TNSP's Revenue Proposal must, as a minimum, contain, or be accompanied by, the following information:

- Any audit assurances that the AER requires under section 2 of the Submission Guidelines.
- A Directors' Responsibility Statement as required under section 2 of the Submission Guidelines.
- Forecasts of capital and operating expenditure for each year of the relevant regulatory control period and related information as required by the NER. This includes a justification for these expenditure forecasts and an identification and explanation of any significant interactions between capital and operating expenditure.
- A completed version of pro forma statement 7.3 at Appendix A of the Guidelines detailing the values that are to be attributed to the performance incentive scheme parameters, as well as an explanation of how the proposed values comply with the requirements of that scheme.
- A completed version of pro forma statement 7.4 at Appendix A of the Guidelines detailing the values that are to be attributed to the efficiency benefit sharing scheme parameters, as well as an explanation of how the proposed values comply with the requirements of that scheme.
- The TNSP's calculations of the estimated total revenue cap and maximum allowed revenue for the relevant regulatory control period using the post-tax revenue model as well as of the regulatory asset base. This must be accompanied by details of the amounts, values and inputs used to generate these calculations, a demonstration of their compliance with relevant requirements of the NER and an explanation of how the calculations have been made.
- The commencement and length of the period to be used by the AER to calculate the nominal risk free rate for the regulatory control period.

- A completed version of pro forma statement 7.2 at Appendix A of the Guidelines detailing the TNSP's depreciation schedules for each relevant asset. This must be accompanied by details of the amounts, values and inputs used to compile these schedules, a demonstration of their compliance with relevant requirements of the NER and an explanation of how the calculations have been made.
- The X factors nominated by the TNSP for each year of the relevant regulatory control period, together with a demonstration that those X factors comply with the requirements of the NER.
- The proposed commencement and length of the regulatory control period.
- A description, and forecast of capital expenditure associated with, any proposed contingent projects, together with associated information required under the NER.
- A completed version of pro forma statement 7.1 at Appendix A of the Guidelines detailing the TNSP's breakdown of its weighted average cost of capital calculation, together with a demonstration that the calculation complies with the requirements of the NER.
- The TNSP's demand forecasts for each regulatory year of the regulatory control period that have been used as the basis of its forecast operating and capital expenditure, as well as details of the assumptions supporting, and an explanation of, their preparation.
- The estimated cost of corporate income tax calculated by the TNSP, together with a demonstration that the calculation complies with the NER.
- A post-tax revenue model completed in a manner that demonstrates its application to the TNSP.
- A completed asset base roll forward model and the TNSP's calculation of the regulatory asset base for the relevant transmission system for each regulatory year of the relevant regulatory control period using the roll forward model. This must be accompanied by details of the amounts, values and inputs used for this calculation, a demonstration of their compliance with relevant requirements of the NER and an explanation of how the calculations have been made.
- If requested by the AER, details of the information a TNSP intends to provide in support of any application made to the AER to pass through a positive pass through amount or a negative pass through amount.
- If requested by the AER, the values that a TNSP proposes are to be attributed to self insurance costs for each regulatory year of the relevant regulatory control period. This must be accompanied by details of the amounts, values and inputs used to calculate these costs and an explanation of how the calculations have been made (and supporting information)

- The name and description of each individual prescribed transmission service provided by the TNSP that is the subject of that Revenue Proposal and details about the nature of these services and
- A forecast map of the transmission system for the relevant regulatory control period, together with any accompanying notes.

Section 4 of the First Proposed Submission Guidelines also details when, consistent with the requirements of the NER:

- a TNSP must submit, or resubmit, its Revenue Proposal or revised Revenue Proposal to the AER and
- the AER may publish the information that is to be provided by a TNSP in its Revenue Proposal, and what shall be treated as “protected information” for the purposes of the NER, and therefore not published.

- Q3. Are the proposed requirements in relation to the information to be included in, or to accompany, a TNSP’s Revenue Proposal appropriate given the requirements of the NER? Should the AER require any other information to be contained in, or to accompany, the TNSP’s Revenue Proposal?*
- Q4. Are the proposed arrangements for the submission, or resubmission, of a TNSP’s Revenue Proposal or revised Revenue Proposal appropriate given the requirements of the NER?*
- Q5. Are the proposed arrangements for the publication of a TNSP’s Revenue Proposal, and the treatment of ‘protected information’, appropriate given the requirements of the NER?*

### **3.5 Negotiating framework**

Section 5 of the First Proposed Submission Guidelines details the required contents of a TNSP’s proposed negotiating framework that sets out the procedure to be followed in relation to negotiations between the TNSP and a service applicant who wishes to receive negotiated transmission services from the TNSP. This section is a new requirement that stems from the AEMC’s review of Chapter 6. This section requires that a TNSP’s proposed negotiating framework must comply with relevant provisions of the NER and the Guidelines. In particular, a proposed negotiating framework must, as a minimum, contain, or be accompanied by, a requirement for:

- A TNSP to provide a description to the service applicant of the nature of the negotiated transmission service that is the subject of negotiation.
- A TNSP and a service applicant to negotiate in good faith the price at which the negotiated transmission service is to be provided.
- A TNSP to provide such commercial information as a service applicant may reasonably require to enable that applicant to engage in effective price negotiation with the TNSP.

- A TNSP to identify, and inform a service applicant of, the reasonable costs, or changes in costs, of providing the negotiated transmission service and that the charges for providing the negotiated transmission service reflect those costs.
- A TNSP to base its price for a negotiated transmission service on the costs of providing that service, determined using its Cost Allocation Methodology.
- A TNSP to provide the service applicant with the other terms and conditions on which the TNSP would provide its negotiated transmission service.
- A service applicant to provide such commercial information as a TNSP may reasonably require to enable the TNSP to engage in effective price negotiation with that applicant.
- A TNSP to provide a reasonable period of time for commencing, progressing and finalising price negotiations with a service applicant and for each party to use its reasonable endeavours to adhere to those time periods during the negotiation.
- A TNSP to provide a process for dispute resolution.
- A service applicant to pay a TNSP's reasonable direct expenses incurred in processing the application to provide the negotiated transmission service.

Consistent with the requirements of the NER, section 5 of the First Proposed Submission Guidelines also:

- details when a TNSP must submit, or resubmit, its proposed negotiating framework or revised negotiating framework to the AER and
- specifies that the AER may publish the information that is to be provided by a TNSP in its proposed negotiating framework.

*Q6. Are the proposed requirements in relation to the information to be included in, or to accompany, a TNSP's proposed negotiating framework appropriate given the requirements of the NER? Should the AER require any other information to be contained in, or to accompany, the TNSP's proposed negotiating framework? (for example non-price matters?)*

*Q7. Are the proposed arrangements for the submission, or resubmission, of a TNSP's proposed negotiating framework, or revised negotiating framework, appropriate given the requirements of the NER?*

*Q8. Are the proposed arrangements for the publication of a TNSP's negotiating framework appropriate given the requirements of the NER?*

### **3.6 Pro forma statements**

The Submission Guidelines include a number of pro forma statements that a TNSP must use in order to provide the information required as part of its Revenue Proposal to the AER.

### **3.6.1 Historic operating expenditure**

There are seven pro forma statements in relation to historic operating expenditure information:

- Pro forma statement 1.1 requires the TNSP to provide a summary of historic operating expenditure by category for each year leading up to the new regulatory period, supported by details of key cost drivers and an explanation of material differences over time.
- Pro forma statements 1.2 to 1.7 require the TNSP to provide a breakdown of historic operating expenditure for each year leading up to the new regulatory period, split by key cost driver (each pro forma relating to a particular driver).

### **3.6.2 Forecast operating expenditure**

There are six pro forma statements in relation to forecast operating expenditure information:

- Pro forma statement 2.1 requires the TNSP to provide a summary of forecast operating expenditure by category for each year of the new regulatory period, supported by details of key cost drivers and an explanation of material differences over time.
- Pro forma statements 2.2 to 2.6 require the TNSP to provide a breakdown of forecast operating expenditure for each year of the new regulatory period, split by key cost driver/category.

### **3.6.3 Historic capital expenditure**

There are four pro forma statements in relation to historic capital expenditure information:

- Pro forma statement 3.1 requires the TNSP to provide a breakdown of historic capital expenditure for each year leading up to the new regulatory period, broken down by network and non-network expenditure category.
- Pro forma statement 3.2 requires the TNSP to provide a breakdown of historic capital expenditure for each year leading up to the new regulatory period, broken down by asset class.
- Pro forma statement 3.3 requires the TNSP to provide a breakdown of historic network-related capital expenditure for each year leading up to the new regulatory period, broken down by project.
- Pro forma statement 3.4 requires the TNSP to provide a breakdown of historic non-network-related capital expenditure for each year leading up to the new regulatory period, broken down by project.

### **3.6.4 Forecast capital expenditure**

There are four pro forma statements in relation to forecast capital expenditure information:

- Pro forma statement 4.1 requires the TNSP to provide a breakdown of forecast capital expenditure for each year of the new regulatory period, broken down by network and non-network expenditure category.
- Pro forma statement 4.2 requires the TNSP to provide a breakdown of forecast capital expenditure for each year of the new regulatory period, broken down by asset class.
- Pro forma statement 4.3 requires the TNSP to provide a breakdown of forecast network-related capital expenditure for each year of the new regulatory period, broken down by project.
- Pro forma statement 4.4 requires the TNSP to provide a breakdown of forecast non-network-related capital expenditure for each year of the new regulatory period, broken down by project.

### **3.6.5 Commentary**

Pro forma statements 5.1 to 5.3 require the TNSP to provide commentary on its historic and forecast operating and capital expenditure.

### **3.6.6 Instructions/Definitions**

Pro forma statements 6.1 to 6.3 provide instructions and definitions that should be followed and used by a TNSP in completing pro forma statements 1.1 to 5.3.

### **3.6.7 Other matters**

There are four other pro forma statements that must be completed as part of a TNSP's Revenue Proposal:

- Pro forma statement 7.1 requires a TNSP to nominate minimum inputs for its nominated weighted average cost of capital calculation. It must also provide full and detailed explanations of the basis of its calculations and references to any sources of information or precedents.
- Pro forma statement 7.2 requires the TNSP to provide various information in relation to its depreciation for the new regulatory period.
- Pro forma statement 7.3 requires the TNSP to provide performance incentive scheme parameters for the purposes of the new regulatory period.
- Pro forma statement 7.4 requires the TNSP to provide efficiency benefit sharing parameters for the purposes of the new regulatory period.



*Q9. Are the proposed pro forma statements that a TNSP must complete as part of its Revenue Proposal appropriate given the requirements of the NER? Should the AER require any other information to be included in its pro forma statements?*



## 4 List of questions for comment

The following is the list of questions on which interested parties' specific comments have been sought throughout this Issues Paper.

- Q1. Are the proposed general principles to be applied to historic and forecast information appropriate? Should any other principles be reflected into the Submission Guidelines?
- Q2. Are the proposed general principles to be applied to forecast information appropriate? Should any other principles be reflected into the Submission Guidelines?
- Q3. Are the proposed requirements in relation to the information to be included in, or to accompany, a TNSP's Revenue Proposal appropriate given the requirements of the NER? Should the AER require any other information to be contained in, or to accompany, the TNSP's Revenue Proposal?
- Q4. Are the proposed arrangements for the submission, or resubmission, of a TNSP's Revenue Proposal or revised Revenue Proposal appropriate given the requirements of the NER?
- Q5. Are the proposed arrangements for the publication of a TNSP's Revenue Proposal, and the treatment of 'protected information', appropriate given the requirements of the NER?
- Q6. Are the proposed requirements in relation to the information to be included in, or to accompany, a TNSP's proposed negotiating framework appropriate given the requirements of the NER? Should the AER require any other information to be contained in, or to accompany, the TNSP's proposed negotiating framework?
- Q7. Are the proposed arrangements for the submission, or resubmission, of a TNSP's proposed negotiating framework, or revised negotiating framework, appropriate given the requirements of the NER?
- Q8. Are the proposed arrangements for the publication of a TNSP's negotiating framework appropriate given the requirements of the NER?
- Q9. Are the proposed pro forma statements that a TNSP must complete as part of its Revenue Proposal appropriate given the requirements of the NER? Should the AER require any other information to be included in its pro forma statements?