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Lodged via email

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Dear Kris,

AER's networks information requirements review discussion paper

Jemena Electricity Networks (**JEN**) welcomes the opportunity to respond to the Australian Energy Regulator's (**AER**) network information requirements review discussion paper (**discussion paper**). We support the AER's ongoing engagement and consultation on information requirements. Refining and consolidating the data and information that distribution network service providers (**DNSPs**) are required to provide ensures that stakeholders have access to relevant network information while also improving regulatory efficiency and delivering customers long-term benefits.

Overall, we agree with the AER that there is a strong need for a review of reporting requirements and that current processes need to be refreshed.¹ We also agree with the AER's aim to streamline information collection from NSPs and improve information sharing across the industry. In addition, we support the AER's preliminary view of minimising the substantial amount of non-data reporting requirements, such as submitting basis of preparation documents, accounting policies, cost allocation methodologies and corporate structures.

However, we consider that the AER could further rationalise and consolidate DNSPs' information reporting requirements. The discussion paper notes that the AER aims to reduce the reporting burden on NSPs.² However, the consultation workbooks published mostly request data that is already captured in the AER's existing regulatory information notices (**RINS**), as well as a substantial amount of new or altered data. Changing current data requirements could potentially break the time series comparability of existing data and may have broader implications on our benchmarking performance and other regulatory outcomes.

Attachment A outlines our detailed submission, including responses to the AER's consultation questions and a detailed review of the nine consultation workbooks. We look forward to continuing to engage with the AER and other stakeholders on the networks information requirements review over the next several months. If you have any questions regarding this letter or our submission, please contact me on [REDACTED]

Kind regards,

[Signed]

Matthew Serpell
Manager Electricity Regulation
Jemena Electricity Networks

¹ AER, *Networks information requirements review discussion paper*, March 2022, p. 1.

² AER, *Networks information requirements review discussion paper*, March 2022, p. 10.



Jemena Electricity Networks (Vic) Ltd

Submission to the AER's networks information requirements review discussion paper



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Submission to the AER's networks information requirements review discussion paper

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Abbreviations

AER	Australian Energy Regulator
ACS	alternative control services
BoP	basis of preparation
CAIDI	Customer Average Interruption Duration Index
CAM	cost allocation methodology
DER	distributed energy resources
DNSP	distribution network service provider
ESV	Energy Safe Victoria
JEN	Jemena Electricity Networks
MECE	mutually exclusive collectively exhaustive
MED	major event day
NSP	network service provider
RAB	regulatory asset base
RIN	Regulatory Information Notice
RIO	Regulatory Information Order
SCS	standard control service
STPIS	Service Target Performance Incentive Scheme

1. Response to the AER's discussion paper

Jemena Electricity Networks (**JEN**) welcomes the opportunity to respond to the Australian Energy Regulator's (**AER**) network information requirements review discussion paper (**discussion paper**). We support the AER's ongoing engagement and consultation on information requirements. Refining and consolidating the information that network service providers (**NSPs**) are required to provide ensures that stakeholders have access to relevant network information while also improving regulatory efficiency and delivering customers long-term benefits.

Overall, we agree that there is a need to review reporting requirements and agree with the AER's aim to streamline information collection from NSPs and improve information sharing across the industry. We also support the AER's preliminary view of minimising the substantial amount of non-data reporting requirements, such as submitting basis of preparation documents (**BoPs**), accounting policies, cost allocation methodologies (**CAMs**) and corporate structures. However, we consider that the AER could further rationalise and consolidate NSPs' information reporting requirements.

Our submission responds to the AER's consultation questions and provides feedback on the reporting obligation changes outlined in its consultation workbooks:

- The discussion paper notes that the AER aims to reduce the reporting burden on NSPs.¹ However, the consultation workbooks mostly request data that is already captured in the AER's existing regulatory information notices (**RINs**), as well as a substantial amount of new or altered data. Changing current data requirements could potentially break the time series comparability of existing data and may have broader implications on our benchmarking performance and other regulatory outcomes. For example, we have identified potential issues with the changes to *customer number* definitions across different templates. Depending on which method is adopted, NSPs may need to rebalance tariffs, adjust incentive targets under the STPIS and/or restate opex data to be incorporated in benchmarking analysis.
- We consider the AER should ensure that each data requirement has a clear purpose. Otherwise, the reporting becomes reporting for reporting's sake and no value is derived from the resource-intensive processes NSPs undertake. For example, it is not clear how the mean and standard deviation economic life asset age data in *Consultation workbook 03—Network metrics* is used or why this data is required. This is one of several areas where the AER may be able to further rationalise its requirements and help improve NSPs' reporting efficiency.
- The discussion paper outlines that the AER will issue the final instrument in Q2 of 2023, but it is unclear if the new information requirements will first apply for the 2022-23 reporting year or 2023-24. As outlined in more detail in section 3 below, several of the new (and existing) data requirements will require significant system changes. If the new requirements are expected to apply from 2022-23, we cannot necessarily collate data in September or October 2023. In many instances, we will need systems in place from 1 July 2022 and change processes implemented before this to capture the data prospectively.
- The process and system changes necessary to report against the new set of requirements—combined with already overloaded internal teams focused on the significant changes and reforms across the industry (including the post-2025 market review)—means we require as much lead time as possible to implement these changes before the new regulatory information order (**RIO**) applies. Therefore, we propose that the changes come into effect for the 2023-24 reporting year.
- We consider that the information reported annually as part of the Victorian fire factor (**F factor**) scheme should be included within the scope of this review. Although this scheme only applies in Victoria, we note there are existing information requirements in the current RINs that are jurisdictional and specific to individual NSPs. Therefore, with jurisdiction-specific reporting already an accepted practise, we consider the F factor scheme reporting could also be incorporated into the RIO process. We also consider that the F factor scheme audit requirements should be relaxed given the AER seeks and receives its own assurance regarding the information from Energy Safe Victoria (**ESV**). Relaxing NSP-provided assurance would improve our long-term regulatory reporting efficiency and reduce costs, consistent with the objectives of this review.

¹ AER, *Networks information requirements review discussion paper*, March 2022, p. 10.

2. Response to the AER's consultation questions

Below, we outline the specific questions outlined in the AER's consultation paper and respond to each.

Do you see any risks or benefits in relying on regulatory information orders, rather than bilaterally negotiated regulatory information notices? Should any regulated networks be excluded from the scope of the proposed information orders? If so, why?

We agree with the AER's preliminary view of developing RIOs to specify the future annual information reporting obligations imposed on regulated NSPs. All stakeholders can participate in the process of setting and amending information requirements, which will improve transparency and data consistency.

Is there any new data that the AER should consider including in its data requirements? If so, why is it needed and how should the data be used? Is there any data you consider could be removed from the current data requirements? Are there any other changes you would like to see to our data requirements?

As noted in section 1 above, we consider that the AER could further rationalise and consolidate NSPs' information reporting requirements. We recommend a thorough review of each consultation workbook, ensuring that each data requirement has a clear purpose. For example, it is not clear how the mean and standard deviation economic life asset age data in *Consultation workbook 03—Network metrics* is used or why this information is required. Many data requirements take up significant resources to collect and with no clear purpose and end-use, stakeholders begin to question the efficiency of the data requirement. Further, given the new data requirements being requested, we require a larger scope for estimated data than what is currently provided in the existing RINs.

What non-data information do you consider should be provided to the AER? Are there any non-data requirements you would support being removed from future reporting processes? Are there any examples of a basis of preparation you consider to be materially better than others?

The current annual information requirements include a substantial amount of 'non-data requirements'. The consultation paper recognises this and we support the AER's view of minimising this non-data reporting.² In support of this objective, we suggest removing the requirement for NSPs to provide non-data information:

- unless it has changed materially from year to year (i.e. BoPs and accounting policies)
- if it is already available to the AER from other sources (i.e. CAMs and corporate structures).

This would improve NSPs' annual information reporting efficiency and result in long-term cost savings for customers. While we consider removing these onerous templates will be beneficial, we prefer that avenues remain open to provide non-data information to the AER and other stakeholders voluntarily.

Do you have any feedback on the AER's proposal to maintain the current assurance processes?

The discussion paper outlines the AER's preliminary view that information must be endorsed by company officers and subject to review by an independent auditor or assurance provider.³ We support providing assurance on the data provided as it gives stakeholders confidence regarding the quality and accuracy of reporting and that NSP managers take their obligations seriously. However, we believe several changes could be adopted to make these

² AER, *Networks information requirements review discussion paper*, March 2022, p. 9.

³ AER, *Networks information requirements review discussion paper*, March 2022, p. 11.

processes more efficient. Currently, actual financial information is subject to reasonable assurance. We propose that this be changed to limited assurance, consistent with the assurance on estimated and non-financial information. This change in approach comes at a significantly lower cost, while still providing a high level of assurance and is backed by the assurance provided in the statutory declarations. Alternatively, reasonable assurance over the corporate accounts that feed into the response materials could be adopted.

We also note that some information cannot be audited and this should be explicitly carved out from the AER's RIO requirements. We outline these items and explain why below.

- The 2014 CAM data requested in *Consultation workbook 6* cannot be audited. This information is a hypothetical version of an NSP's opex if an alternative accounting allocation had been adopted in preparing its financial records. This alternative version is not maintained in our accounts and is a "construct" that cannot be attested to through any corporate accounting requirement or audit or statutory declaration processes.
- Existing non-data requirements, such as the basis of preparation documents, the response to RIN schedule one etc., are not currently audited. To the extent that this non-data information is required under the new RIO, they cannot be audited, consistent with our current reporting approach.

How should the AER deal with changing information requirements? How frequently should they be updated? How should we get the information we need before the requirements are included in an updated order?

The discussion paper outlines the AER's preliminary view that the information requirements should be reviewed every four years, with informal collaborative processes used to address changing information requirements between reviews.⁴ We support this approach and consider that formally reviewing these data collection requirements more frequently than every four years would be too frequent and would present a costly burden.

We agree that informal collaborative processes will be the best way to address changing information requirements between reviews, but we would encourage the AER to focus these informal requests on the most critical information and ensure that sufficient time is provided to collect information. We also consider that all information requirements should be incorporated into the initial RIO, rather than having separate ad-hoc requests (e.g. the AER's distributed energy resources (DER) export service metrics information request from March 2022). This will improve the efficiency of our data reporting, consistent with the goals of the AER's review.

What tools will best meet the needs of networks submitting information to the AER? What constraints should we be aware of in designing new information collection systems and processes? How would you like to access the AER's data relating to regulated NSPs? Are there other agencies that are good at sharing data?

We support the AER's aim of developing an information exchange portal to streamline the submission process and developing an information access system to facilitate data sharing with all stakeholders.⁵ We agree that the current process of publishing business-specific data files and models makes accessing data across different NSPs and reporting years difficult. NSPs submit a significant amount of useful data and all stakeholders should be able to access this information easily. We do not have any particular views on the specific tools or data platforms that the AER should implement but we consider several design criteria should be included:

- API interfaces that allow data in structured formats to be uploaded and downloaded
- easy-to-navigate web-based portals that can produce time series data
- controls to protect sensitive and confidential data, consistent with the AER's confidentiality guideline.

⁴ AER, *Networks information requirements review discussion paper*, March 2022, p. 12.

⁵ AER, *Networks information requirements review discussion paper*, March 2022, pp. 14-15.

3. Detailed review of the AER's consultation workbooks

Below, we provide a detailed response to the AER's nine consultation workbooks. To provide context, we outline the current RIN references specified by the AER in its consultation workbooks. In some instances, the AER's stated current RIN references are incorrect. In other instances, the AER provides a current RIN reference but the data required in the new workbook differs significantly from the existing requirement in the current RIN. In these cases, we are concerned that—intentional or otherwise—the changes will break the time series comparability of our historically provided data and may have broader implications on our benchmarking performance and other regulatory outcomes. We seek clarity from the AER on whether or not these changes are intentional and, if so, why the new data structure is required.

Table 3–1: Detailed review of the AER's nine consultation workbooks

Issue number	Worksheet	Data requirement	Current RIN reference (if applicable)	Comments	Cell reference (if applicable)
Consultation workbook 02—Operational outputs					
1	Energy delivered by cost-reflective tariff	All data in this worksheet	AR RIN P.1	The data requested in this worksheet is more granular than the existing data reported in <i>AR RIN P.1</i> . The data is requested by both meter type and tariff name and code, whereas the existing data does not provide this breakdown. In addition, this worksheet seeks the energy delivered in MWh, whereas the existing RIN requires customers by NMI count. We can provide the data requested in the new format, subject to the reconciliation issues outlined below in issue 3.	N/A
2	Energy delivered by non-cost-reflective tariff	All data in this worksheet	N/A	As above.	N/A
3	Demand	Coincident and non-coincident maximum demand by zone substation	CA RIN 5.4.2	We consider this section is labelled incorrectly. The current RIN reference should be <i>CA RIN 5.4.1</i> , not <i>CA RIN 5.4.2</i> .	E96 to H147
4	Connections	New connections	CA RIN 2.5	The information requested in this section splits the new SCS connections data into overhead and underground categories. However, <i>CA RIN 2.5</i> currently provides total connections volumes based on an overhead and underground split but not an SCS/ACS split. <i>AR RIN (new historic) 2.5</i> provides new connections based on an SCS/ACS split but not an overhead and underground breakdown. We can provide this data in the new format requested.	E5 to H43

Issue number	Worksheet	Data requirement	Current RIN reference (if applicable)	Comments	Cell reference (if applicable)
5	Proposed new data collections	All data in this worksheet ⁶	N/A	The proposed new data collections— <i>responsive</i> and <i>preventative</i> for <i>safety</i> and <i>major event-related</i> activities—have no clear definitions. Further, these concepts are very broad, particularly safety-related and preventative activities. NSPs could argue that most network activities are preventative and/or safety-related. In addition, it is not clear if these <i>major events</i> relate to the major event day (MED) threshold in the STPIS. Without clear definitions and further clarification, we are unable to report against this set of criteria. We request clarity from the AER on these definitions and requirements to respond to this consultation topic.	N/A
Consultation workbook 03—Network metrics					
6	Capacity	Selected asset characteristics—Capacity data	CA RIN 2.2.2	It is not clear if the units for this data are <i>asset volumes currently in commission</i> or <i>asset replacements</i> , which are both reported in CA RIN 2.2.2. Please clarify the units required.	E49 to K52
7	Age	Asset age	N/A	As outlined in section 1, it is not clear how the mean and standard deviation economic life asset age data is or could be used or why this information is required. We consider this is one area where the AER can rationalise its information requirements and help improve DNSPs' reporting efficiency.	E4 to K126
8	Staffing and terrain	Terrain factors	EB RIN 3.7.2	This section requests the <i>average number of defects per maintenance span</i> . However, the current RIN provides the <i>average number of defects per <u>vegetation maintenance span</u></i> . We seek clarity on the difference between <i>maintenance span</i> and <i>vegetation maintenance span</i> and how the data in this section will be used.	E52 to I73
Consultation workbook 04—Customer numbers					
9	Concepts and definitions	Customer numbers	N/A	The <i>concepts</i> tab defines <i>customers receiving energy = active + unmetered</i> . However, the <i>definitions</i> tab states <i>customers receiving energy</i> includes both <i>energised (active)</i> and <i>de-energised</i> customers. The current definition for customer numbers reported for benchmarking purposes includes active and de-energised customers, which is consistent with the definitions tab but inconsistent with the concepts tab. If the AER intends to change the definition of customer numbers, all NSPs will need to resubmit historical customer numbers data from 2006 to 2021 under this new definition to maintain comparability and consistency. For this reason, we recommend maintaining the current customer numbers definition and amending the concepts tab to align with the definitions tab.	N/A

⁶ These categories and definitions also apply across several other *consultation workbooks*.

Issue number	Worksheet	Data requirement	Current RIN reference (if applicable)	Comments	Cell reference (if applicable)
10	Customers receiving energy	Customers receiving energy	EB RIN 3.4.2.1 and 3.4.2.2	We currently report these customer numbers as an average across two periods rather than reporting as at a point in time as required in <i>cell H3</i> . If we continue to report customer numbers as an average across two periods, they will not align with the customer numbers reported in the <i>cost-reflective</i> and <i>non-cost-reflective tariffs</i> worksheets. However, if we report these customer numbers at a point in time, the STPIS calculations will change because the STPIS currently uses average customer numbers, consistent with how the data is currently reported in <i>EB RIN</i> . Depending on which method is adopted, NSPs may need to rebalance tariffs, adjust the incentive targets under the STPIS and/or restate opex data to be incorporated in benchmarking analysis. For this reason, we recommend maintaining the time series consistency of this customer numbers data.	E4 to H17
11	Customers by feeder	Customers by feeder	AR RIN 3.6	We consider this section is labelled incorrectly. The current RIN reference should be <i>AR RIN 3.6.8</i> , not <i>AR RIN 3.6</i> . In addition, the current reporting in <i>AR RIN 3.6.8</i> does not provide this data split into metered and unmetered customers. We can provide this data in the new format requested.	E4 to J12
12	Cost-reflective tariffs	All data in this worksheet	N/A	See issue 1.	N/A
13	Non-cost-reflective tariffs	All data in this worksheet	N/A	See issue 1.	N/A
14	Customers—other	Distributed energy resources	N/A	We request clarity from the AER on how this new data requirement fits into the AER's DER export service metrics information request from March 2022. We do not consider that reporting data in two separate but related processes meets the objectives of the AER's information requirements review. We request that the AER outline which data set will be required as part of the RIO. We consider that all information requirements should be incorporated into the initial RIO, rather than having separate ad-hoc requests (e.g. F factor reporting and profitability and DER export service metrics information requests). This will improve our data reporting efficiency, consistent with the goals of the AER's review.	E10 to K17

Issue number	Worksheet	Data requirement	Current RIN reference (if applicable)	Comments	Cell reference (if applicable)
15	Customers—other	Unmetered customers by class	N/A	This section appears to request the number of <i>unmetered customers</i> but the definitions tab lists out different device types, including <i>street lights, traffic controls, phone or transport cubicles</i> etc. We wish to clarify if the AER requires the number of unmetered customers or the number of unmetered devices, noting that an individual unmetered customer may have multiple unmetered devices.	E13 to H17
Consultation workbook 05—Service performance					
16	Concepts	Customers	N/A	To improve the clarity of this concept, we consider the last line should be amended to “For STPIS purposes, <i>customer</i> is defined in the AER’s Distribution Reliability Measures Guideline but should exclude inactive accounts as per the AER’s STPIS v 2.0 - 14 November 2018 Appendix A”. This appendix outlines that: <ul style="list-style-type: none"> unmetered supplies should be excluded from reliability measure calculation except where unmetered supplies cannot be identified in historical data inactive accounts are excluded. 	B14
17	Concepts	Urban feeder	N/A	This concept is defined as “a feeder, which is not a CBD feeder, with actual maximum demand over the reporting period per total feeder route length greater than 0.3 MVA/km”. However, the definition in the AER’s Distribution Reliability Measures Guideline is “a feeder, which is not a CBD feeder and has a three-year average maximum demand over the three-year average feeder route length greater than 0.3 MVA/km”. We request clarity from the AER on whether the calculation should be based on reporting period or a three-year average.	B18
18	Concepts	Excluded events	N/A	This concept is “as defined in the AER’s STPIS scheme and/or the AER’s Distribution Reliability Measures Guideline”. However, in many cases, <i>excluded events</i> refer only to section 3.3(a) of the STPIS (page 13), whereas in some cases, they refer to both sections 3.3(a) and 3.3(b) of the STPIS (pages 13-14). Therefore, we recommend that the AER clearly defines <i>excluded events</i> by referencing these specific sections of the STPIS.	B24
19	Interruptions	Interruptions to supply	CA RIN 3.2	We consider this section is labelled incorrectly. The current RIN reference should be <i>AR RIN 6.2</i> , not <i>AR RIN 3.2</i> . In addition, the current <i>CA RIN 6.3</i> does not describe the network service area. We can provide the new data requested.	E4 to M11

Issue number	Worksheet	Data requirement	Current RIN reference (if applicable)	Comments	Cell reference (if applicable)
20	Interruptions	Interruptions to supply	CA RIN 6.3	<p>This section requests <i>detailed reason for interruption</i> information and is marked as a required input. However, this information is currently optional in CA RIN 6.3. For individual rows in this section, the <i>detailed reason for interruption</i> may not be available. We seek clarity from the AER on whether this information will be mandatory or optional in the new consultation workbook.</p> <p>In addition, this section requests <i>duration of interruption</i> data for each interruption reported. However, the current CA RIN reports the <i>average duration of sustained customer interruption</i>, and JEN has historically reported the Customer Average Interruption Duration Index (CAIDI) of the event in this RIN. We seek clarity from the AER on whether this column is still referring to average duration (CAIDI) per event, as each event—whether planned or unplanned—can have multiple restoration stages of different durations. Under the definition in this worksheet, it could be interpreted that DNSPs are required to count five outage restoration stages of one outage cause as five separate outages.</p>	E4 to M11
21	Call centre	Daily performance data—unplanned	AR 6.7.1	<p>The current reporting in AR RIN 6.7.1 does not request the <i>total number of calls received</i>. The definition provided—"Calls to the fault line, including any answered by an automated response service and terminated without being answered by an operator. Excludes missed calls where the fault line is overloaded"—aligns with the previous definition of <i>calls to call centre fault line</i> from 2011 to 2013 RIN templates. Therefore, we recommend changing the <i>total number of calls received</i> column to <i>calls to call centre fault line</i> to avoid confusion.</p>	E11 to I378
22	Other service measures	Other services measures—Complaints	AR 3.6.6.1	<p>We consider this section is labelled incorrectly. The current RIN reference for the <i>complaints</i> data should be AR RIN 3.6.7.4, not AR RIN 3.6.6.1.</p>	E14 to H19
23	Other service measures	Energy not supplied	N/A	<p>We recommend adding a total calculation for <i>energy not supplied (planned and unplanned)</i> in cell H62.</p>	E62 to H64
24	Other service measures	Fire starts—unplanned vegetation events	AR	<p>We consider this section is labelled incorrectly. The current RIN reference should be CA RIN 2.7.3, not AR. We can provide the new data requested in this section.</p>	E69 to H76

Consultation workbook 06—Operating expenditure

Issue number	Worksheet	Data requirement	Current RIN reference (if applicable)	Comments	Cell reference (if applicable)
25	Distribution business	Income statement	N/A	We recommend removing this section from this workbook if the data will be collected in <i>Consultation workbook 09—Revenue and financial statements</i> .	E5 to J8
26	Distribution business	Related party margins	AR RIN 8.4.1	We consider this section is labelled incorrectly. The current RIN reference should be <i>AR RIN 8.4.2</i> , not <i>AR RIN 8.4.1</i> .	E15 to J18
27	SCS	Related party margins	AR RIN 8.4.1	We consider this section is labelled incorrectly. The current RIN reference should be <i>AR RIN 8.4.2</i> , not <i>AR RIN 8.4.1</i> .	E11 to P14
28	SCS	Opex by purpose	N/A	For some DNSPs including JEN, the opex reported in <i>opex by purpose</i> will be identical to the opex reported under <i>opex category</i> . If this section is retained, we recommend including calculated totals for this section in row 17.	E17 to P23
29	SCS	Maintenance	N/A	The input formatting is missing on <i>network underground cable maintenance</i> .	I52
30	SCS	Network and corporate overheads	N/A	We recommend adding in calculated totals in these sections in rows 151 and 159.	E151 to P165
31	SCS	Labour expenditure	CA 2.11	We consider this section is labelled incorrectly. The current RIN reference should be <i>CA RIN 2.11.1</i> , not <i>CA 2.11</i> . Further, we do not currently provide an SCS split for <i>network overheads</i> or <i>total direct network labour</i> . We currently provide this information at a DNSP level in <i>CA RIN 2.11.1</i> . Significant internal process and system changes are required to provide the data requested in this new format.	E184 to P205
32	ACS	All data in this worksheet	N/A	This worksheet includes columns for energy-efficient and non-energy-efficient public lights (columns J and K, respectively), but no data is requested in these columns. The same issue occurs in columns M and N for smart and legacy meters, respectively. Therefore, we recommend that these columns are removed.	N/A
33	ACS	Opex category	AR RIN 8.4.1	We consider this section is labelled incorrectly. The current RIN references should be <i>AR RIN 8.4.1</i> and <i>8.4.2</i> , not <i>8.4.1</i> .	E7 to U16
34	ACS	Opex by purpose	CA RIN 2.1.4	The current <i>CA RIN 2.1.4</i> does not split out opex by purpose into fee and quoted services and indirect costs. We can provide this data in the new format requested.	E19 to U23

Issue number	Worksheet	Data requirement	Current RIN reference (if applicable)	Comments	Cell reference (if applicable)
35	ACS	Opex—Economic benchmarking categories	N/A	We do not understand why DNSPs are required to report custom business-defined opex categories for benchmarking purposes. DNSPs will report a range of different categories in this section and the data therefore will not be able to be used for benchmarking. Therefore, we recommend that this section is removed.	E33 to U37
36	ACS	Public lighting activities	CA RIN 4.1.2	Total expenditure data for each service (e.g. light installation, light replacement etc.) is currently reported in <i>CA RIN 4.1.2</i> . The new workbook requires this expenditure data to be further broken down into <i>major and minor road light installation</i> and <i>number of poles installed</i> categories. In the current RIN, only unit cost data is provided for these more granular categories. However, we can provide the new data requested in this section. In addition, this section requests the <i>number of poles installed</i> in the <i>light installation</i> category and <i>number of poles replaced</i> for the <i>light replacement</i> category. However, the units listed in column J are dollars (\$). Therefore, we consider these cells (E52 and E56) should be relabelled to <i>poles installed</i> and <i>poles replaced</i> , respectively.	E48 to U60
Consultation workbook 07—Capital expenditure					
37	SCS	Capex by purpose	CA RIN 8.2.1	Please add more rows in this section. We also consider this section is labelled incorrectly. The current RIN reference should be <i>AR RIN 8.2.1</i> , not <i>CA RIN 8.2.1</i> .	E5 to P17
38	SCS	Total gross capex	CA RIN	Several of these categories are new and were not previously collected in the <i>CA RIN</i> . For example, <i>DER capex</i> is a new category and the current <i>non-network capex</i> category has been further disaggregated into <i>ICT</i> , <i>property</i> , <i>fleet</i> and <i>other non-network</i> categories. We can provide this data in the new format requested.	E18 to P26
39	SCS	Staked wooden poles	CA RIN 2.2.1	We consider this section is labelled incorrectly. The current RIN reference for this section should be <i>AR RIN (new historic) 2.2.1</i> , not <i>CA RIN 2.2.1</i> .	E49 to P62
40	SCS	Public lighting	N/A	Public lighting replacements are not a standard control service and therefore we recommend removing this section from the SCS worksheet and moving the reporting requirement to the ACS worksheet.	E152 to P161
41	SCS	Total DER capex	N/A	The DER projects in this section are labelled with ' <i>TNSP description</i> '. Please update this to ' <i>DNSP description</i> '.	E256 to P259

Issue number	Worksheet	Data requirement	Current RIN reference (if applicable)	Comments	Cell reference (if applicable)
42	SCS	Connections—Capital contributions	CA RIN 2.5.2	We consider this section is labelled incorrectly. The current RIN reference for this section should be <i>AR RIN (new historic) 2.5.2</i> , not <i>CA RIN 2.5.2</i> .	E308 to P326
43	SCS	Non-network	NEW CA/AR	We consider this section is labelled incorrectly. The current RIN reference for this section should be <i>AR RIN (new historic) 2.6.1</i> , not <i>NEW CA / AR</i> .	E396 to P420
44	SCS	Capitalised network and corporate overheads	CA RIN 2.11.1 and 2.12.1	The current RIN does not disaggregate <i>capitalised network overheads</i> into both capex/opex and SCS/ACS splits. We currently cannot provide the <i>CA RIN 2.11.1</i> data as requested in this new format. Significant internal IT system changes would be required to facilitate this new data reporting requirement. However, we can provide the <i>CA RIN 2.12.1</i> data as requested in this new format.	E422 to P450
45	SCS	Labour/non-labour expenditure split	NEW CA/AR	We consider this section is labelled incorrectly. The current RIN reference for this section should be <i>AR RIN (new historic) 2.11.3</i> , not <i>NEW CA / AR</i> .	E452 to P456
46	ACS	Capex by purpose	CA RIN 8.2.3	We consider this section is labelled incorrectly. The current RIN reference for this section should be <i>AR RIN 8.2.3</i> , not <i>CA RIN 8.2.3</i> .	E7 to W19
47	ACS	Public lighting	CA RIN 2.12.1	The <i>energy</i> and <i>non-energy efficient</i> public lighting splits are not currently required in <i>CA RIN 2.12.1</i> . We can provide this data in the new format requested.	E22 to W28
48	ACS	Capitalised network and corporate overheads	N/A	See issue 45.	E59 to W91
49	ACS	Public lighting activities	N/A	See issue 37.	E98 to W110
Consultation workbook 08—Asset base values					
50	Standard control	Reporting year X-1	N/A	We recommend automatically linking the relevant <i>reporting year X-1—closing value</i> cells to the respective <i>reporting year X—opening value</i> cells, rather than requiring these cells to be reinput.	Multiple sections

Issue number	Worksheet	Data requirement	Current RIN reference (if applicable)	Comments	Cell reference (if applicable)
51	Standard control	Indicative total RAB and TAB roll forward	N/A	We request clarity from the AER on the purpose of the indicative total RAB and TAB roll forward sections and how this data will be used. The capex definitions in these sections should also be clarified— <i>RAB capex</i> should exclude capital contributions and <i>TAB capex</i> should include capital contributions. Finally, the TAB does not adjust for capex timing and <i>row 36</i> should therefore be removed.	E18 to J39
52	Alternative control	Reporting year X-1	N/A	See issue 51.	Multiple sections
53	Alternative control	Indicative metering and public lighting RABs	N/A	We request clarity from the AER on the purpose of the indicative total RAB roll forward sections and how this data will be used. We also consider the labelling of the <i>forecast depreciation</i> rows should be <i>actual depreciation</i> , consistent with the approaches applied in the ACS metering and public lighting roll-forward models.	E20 to J39
54	Network services	Reporting year X-1	N/A	See issue 51.	Multiple sections

Consultation workbook 09—Revenue and financial statements

55	Standard control	Tax-related information	N/A	The <i>adjustment to tax expense for value of gifted assets</i> is defined “In the information request for financial performance data”. However, our current information request reports <i>total taxable revenue and/or income for customer contributions and/or gifted assets</i> . We request clarity on whether this new data requirement aligns with the <i>total taxable revenue and/or income for customer contributions and/or gifted assets</i> line item in our current information request.	E44 to M51
56	Standard control	Disaggregated revenue	N/A	Five of the categories requested in this section are ACS categories, not SCS categories (rows 70 to 73 and row 81).	E59 to M73
57	Standard control	Remaining sections in this worksheet	N/A	<i>Jurisdictional scheme payments</i> , <i>cross-boundary expenditure</i> and <i>TUOS expenditure</i> are not reported as SCS expenditure	E91 to M141
58	ACS	Revenue grouping by chargeable quantity	N/A	Only the last four categories in this section (rows 35 to 38) are ACS revenue.	E25 to R38

Issue number	Worksheet	Data requirement	Current RIN reference (if applicable)	Comments	Cell reference (if applicable)
59	ACS	Revenue grouping by customer type or class	N/A	Only the last category in this section (row 46) is ACS revenue.	E40 to R46
60	Negotiated services	Entire worksheet	N/A	JEN currently does not report any information as negotiated services.	—
Consultation workbook 10—Prices					
61	Connections and public lighting	Public lighting activities	CA RIN 4.1.3	CA RIN 4.1.3 reports average unit costs for a range of DNSP-specified categories for <i>light installations</i> , <i>light replacements</i> and <i>light maintenance</i> and does not break this data into the <i>major</i> and <i>minor road</i> and <i>routine</i> and <i>non-routine</i> categories specified. We can provide this data in the new format requested.	E8 to G14

General comments that apply to all or several consultation workbooks

In addition to the comments above, we highlight the following points that apply to several consultation workbooks:

- We suggest removing the *direct* and *indirect* cost categorisation in several of the consultation workbooks (e.g. *06 Operating expenditure* and *07 Capital expenditure*). These concepts:
 - have not been defined in the *Definitions* tabs and we consider that there are likely to be significant inconsistencies in how DNSPs report these categories
 - are not explicitly defined in the AER's Expenditure Forecasting Assessment Guideline or any other published guidance⁷ and therefore do not have any purpose
 - are subjective, which reduces data comparability
 - are duplicative, as there is a clear overlap with the *network* and *corporate overheads* categories.
- We recommend labelling each worksheet in each consultation workbook with a number for ease of user reference and navigation. For example, in *Consultation workbook 02—Operational outputs*, 1. Energy delivered by cost-reflective tariff; 2. Energy delivered by non-cost-reflective tariff; 3. Energy delivered by time. Removing the numerical references will make the data collection process harder to manage and less efficient.
- The existing balancing items have been removed from several consultation workbooks (e.g. *Consultation workbook 06—Operating expenditure* and *Consultation workbook 07—Capital expenditure*). If they are removed, data across RINs will no longer reconcile. JEN reported a balancing item in FY2020-21 for SCS opex (*CA RIN 2.1.2*) because there were non-network IT costs duplicated in both non-network SCS opex and SCS corporate overheads opex. Removing this balancing item would result in SCS opex in the *CA RIN* not reconciling with SCS opex in the *AR RIN*. To overcome these issues, we require clarity from the AER on how to treat information that can overlap or is not mutually exclusive.⁸
- We recommend freezing the window panes in each worksheet of each consultation workbook so that the headings and legend information can be seen even if a user is scrolling down the worksheet.
- We have noticed several examples of the validations in the *Checks and totals* worksheet containing formula errors. For example, the validation check in cell L66 of *Consultation workbook 08—Asset base values* excludes the capex timing adjustment in cell H12 on the *Standard control* worksheet. While we have made a significant effort to identify these issues, we request for the AER to undertake similar quality control checks.
- Where applicable, we recommend retaining the category codes from the existing *EB RIN* (see
- Figure 3–1 below for an example). We rely on these codes to gather data from our internal systems and populate the current RIN templates.

Figure 3–1: Sample template containing category codes

The screenshot shows a 'REGULATORY REPORTING STATEMENT' for Jemena Electricity, 'Benchmarking RIN response 2021'. It includes a '3.1 REVENUE' section with a table titled '3.1.1 - REVENUE GROUPING BY CHARGEABLE QUANTITY'. The table has columns for 'Standard control services' and 'Alternative control services', with sub-columns for 'REVENUE (\$'000)' for the years 2021 and 2023. The rows list various revenue categories with codes, such as 'Revenue from Fixed Customer Charges' (DREV0101) and 'Revenue from Energy Delivery charges where time of use is not a determinant' (DREV0102). A red circle highlights the first few rows of the table.

	Standard control services		Alternative control services	
	REVENUE (\$'000)			
	2021		2023	
DREV0101 Revenue from Fixed Customer Charges				
DREV0102 Revenue from Energy Delivery charges where time of use is not a determinant				
DREV0103 Revenue from On-Peak Energy Delivery charges				
DREV0104 Revenue from Shoulder period Energy Delivery Charges				
DREV0105 Revenue from Off-Peak Energy Delivery charges				
DREV0106 Revenue from controlled load customer charges				
DREV0107 Revenue from unmetered supplies				
DREV0108 Revenue from Contracted Maximum Demand charges				
DREV0109 Revenue from Measured Maximum Demand charges				

⁷ AER, *Expenditure forecasting assessment guideline for electricity distribution*, November 2013.

⁸ Consistent with the mutually exclusive collectively exhaustive (MECE) principle.