Explanatory Statement

Proposed

Electricity distribution network service providers post-tax revenue model

April 2008

Request for submissions

Interested parties are invited to make written submissions to the Australian Energy Regulator (AER) on the issues discussed in this paper by the close of business 14 May 2008. Submissions can be sent electronically to AERInquiry@aer.gov.au.

Alternatively, written submissions can be sent to:

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The AER prefers that all submissions be in an electronic format and publicly available to facilitate an informed, transparent and robust consultation process. Accordingly, submissions will be treated as public documents and posted on the AER's website, www.aer.gov.au, except and unless prior arrangements are made with the AER to treat the submission, or portions of it, as confidential.

Any enquiries about this issues paper, or about lodging submissions, should be directed to the AER's Network Regulation South Branch on (03) 9290 1444 or at the above email address.

Contents

Shortened forms

ACG	Allen Consulting Group
ARR	annual revenue requirement
AER	Australian Energy Regulator
capex	capital expenditure
C&P	CitiPower and Powercor
CGS	Commonwealth government securities
DNSP	distribution network service provider
EBSS	Efficiency benefit sharing scheme
ENA	Energy Networks Association
ESCOSA	Essential Services Commission of South Australia
MEU	Major Energy Users Inc
NEL	National Electricity Law
NEM	National Electricity Market
NER	National Electricity Rules
NPV	net present value
opex	operating expenditure
PTRM	post-tax revenue model
QCA	Queensland Competition Authority
RAB	regulatory asset base
RFM	roll forward model
STPIS	Service target performance incentive scheme
UED	United Energy Distribution

1 Introduction

The Australian Energy Regulator (AER) is responsible for the economic regulation of distribution network service providers (DNSPs) in the National Electricity Market (NEM), in accordance with the National Electricity Rules (NER).

Under the NER, the AER is required to develop and publish certain models, guidelines and schemes. On 30 November 2007, the AER released an issues paper on the following guidelines, schemes and models that are required to be published under Chapter 6:

- Post-tax revenue model (PTRM)
- roll forward model (RFM)
- cost allocation guidelines
- efficiency benefit sharing scheme (EBSS).

The AER also released a separate issues paper on the development of a service target performance incentive scheme (STPIS). These issues papers formed part of a national consultation process that is separate to consultation specific to transitional guidelines, models and schemes for DNSPs in the ACT and NSW.

The AER received 14 submissions on its issues paper. This explanatory statement sets out the AER's consideration of comments raised in these submissions and the resulting proposed PTRM and handbook. In some instances stakeholders raised concerns that need to be addressed in the preparation and assessment of regulatory proposals. These concerns are noted throughout this explanatory statement.

This explanatory statement, proposed PTRM and associated handbook have been prepared to satisfy the AER's obligations under clause 6.16(b) of the NER.

2 Rule requirements

Clause 6.4.1(c) of the NER requires the AER to publish a PTRM within 6 months of the commencement of that clause, that is, by 30 June 2008. In doing so, the distribution consultation procedures in Part G require the AER to publish a proposed PTRM, explanatory statement and invitation for submissions. Stakeholders must be allowed at least 30 business days to make submissions to the AER. Within 80 business days of publishing the proposed PTRM, the AER must publish its final decision and PTRM.

The PTRM will be used to calculate the annual revenue requirements (ARR) of DNSPs. The PTRM must comply with the principles prescribed in the NER under rule 6.4.

3 Reasons for the post-tax revenue model

Under clause S6.1.3(10) of the NER, DNSPs are required to submit a completed PTRM to the AER as part of its building block proposal. The PTRM will be used by DNSPs and the AER to propose and determine ARRs and X factors for each year of the regulatory control period.

The PTRM calculates the ARR for each year of a regulatory control period using the building block approach. Under clause 6.4.3, the building blocks are:

- indexation of the regulatory asset base (RAB)
- the return on capital
- the return of capital (depreciation)
- the estimated amount of corporate income tax payable
- any revenue increments or decrements arising from the application of the EBSS, STPIS and demand management incentive scheme
- any revenue increments or decrements arising from the application of a control mechanism in the previous regulatory control period
- forecast operating expenditure (opex).

4 Issues raised in submissions and the AER response

4.1 Consistency with PTRM for transmission

In its issues paper released in November 2007, the AER noted the commonality between the requirements of chapter 6 and 6A regarding the PTRM. In this context the AER suggested using the PTRM it had developed for electricity transmission as a basis for the electricity distribution PTRM. Key elements of the transmission PTRM include:

- the use of straight line depreciation
- a “hybrid” approach to recognising capital expenditure (capex), where depreciation is calculated from when assets are commissioned while returns on capital are calculated from when capex is incurred
- requiring inflation as a direct input to the PTRM due to the problems of methods which estimate forecast inflation using indexed commonwealth government securities (CGS)
- cash-flow timing assumptions, where all cash-flows except for capex are modelled as if occurring at the end of each regulatory year.

4.1.1 Stakeholder comments

Stakeholders considered that the PTRM developed by the AER under chapter 6A provided an appropriate basis for the development of the PTRM for electricity distribution.

The Energy Networks Association (ENA) noted the need for the PTRM to accommodate transitional provisions in the NER and also principles in the NEL. Specifically, it considered that the PTRM should be developed to be consistent with the requirement to provide a reasonable opportunity to recover at least the efficient costs of service delivery. Ergon Energy listed transitional provisions that are relevant for the development of the PTRM.

Many stakeholders[1] noted problems with recognising capex under a hybrid approach. It was noted that there would be little benefit in moving to this approach as the differences between capex recognised as it is incurred and as commissioned were likely to be minimal for distribution businesses. This was due to distribution network capex being characterised by a larger number of small projects, which is different to capex for electricity transmission networks.

Energex requested that the PTRM be expanded to incorporate up to 50 asset categories to account for the variety of assets held by DNSPs.

United Energy Distribution (UED) and Alinta stated that the NER specify the content of the PTRM at a high level and that the model should be able to accommodate a

[1] CitiPower and Powercor (C&P), Integral Energy, Ergon Energy, UED, Alinta, Country Energy and SP AusNet.

range of alternative calculations where the NER allow, for example in the calculation of depreciation. They noted that the ‘hard-coding’ of a particular depreciation method represented an obstacle to suggesting alternative calculations and inappropriately implied the matter has been predetermined.

The Major Energy Users Inc (MEU) considered that DNSPs should not be allowed to propose depreciation methods that bring forward or defer depreciation as this distorts the recovery of costs from current and future users. It also considered that DNSPs should be prevented from altering depreciation methods during regulatory control periods.

The MEU noted that calculating depreciation on an as-commissioned basis was consistent with accounting standards, and that a hybrid approach should be recognised as providing a bias towards DNSPs. However, it considered that there may be regulatory costs involved in moving away from a full as-incurred approach and that a full as-incurred approach was simpler to model and provided stronger incentives for efficiency.

Aurora Energy noted that some elements of its current determination, e.g. metering, are not assessed using the building block approach and may require specific assessment for inclusion in the PTRM.

SP AusNet questioned whether the AER had taken into account the differences between distribution and transmission businesses, including in terms of customer numbers, unplanned outages, work programs and customer initiated works.

4.1.2 AER conclusion

The AER has adopted the PTRM developed for transmission regulation as a proposed PTRM for electricity distribution. The AER notes the need to account for transitional issues in each jurisdiction in developing its PTRM for distribution. The PTRM to be published will be a generic guideline that incorporates some elements that may not be used or will need to be amended to account for the circumstances of each DNSP. As discussed in this explanatory statement, the AER has identified capital contributions and the forms of control as issues which cannot be specified with any certainty outside of the reset process but have been incorporated in the proposed PTRM to provide a basis for further consultation and amendment.

The AER acknowledges comments regarding the particular characteristics of distribution capex and has amended the PTRM to recognise capex on a fully as-incurred basis.

The proposed PTRM is currently configured to perform calculations using 20 asset categories, but can be amended to accommodate more if desired. The PTRM requires assets to be grouped according to common lives. At present it is unclear that 20 asset classes are not enough for DNSPs, and whether the generic PTRM should incorporate 50 asset classes as suggested by Energex. The AER requests further comment on this issue.

Regarding UED’s and Alinta’s comments, the AER considers that the straight-line depreciation method used in the return of capital building block and for tax depreciation is the only substantive calculation that could be amended or replaced by

DNSPs. The straight-line method used for regulatory depreciation is considered by the AER as being the most likely to comply with the requirements of clause 6.5.5 and represents a ‘safe harbour’ calculation in the PTRM. The depreciation calculations for tax purposes are also included to provide a default method for DNSPs to use or amend for assessment as part of their regulatory proposals. The proposed PTRM and handbook clearly indicate that alternative depreciation methods may be suggested by DNSPs.

The AER is unable to prevent DNSPs from proposing alternative methods for regulatory depreciation, as suggested by the MEU. However, the AER can only approve the use of a depreciation schedule if it is consistent with the requirements of clause 6.5.5(b). Also, once a depreciation method has been determined, clauses 6.5.5(b)(3) and S6.2.1(e)(5) prevent DNSPs from changing this method during a regulatory period.

4.2 Capital contributions

In its issues paper the AER noted that the transmission PTRM may require amendment to recognise capital contributions, however the method of doing so was unclear due to the different approaches adopted in several jurisdictions. For example, the approach adopted by the Essential Services Commission of Victoria has been to deduct the value of contributed assets from the RAB and to recognise the value received as income for calculating tax liabilities. The Queensland Competition Authority (QCA)’s approach has been to include the value of contributions in the RAB and net these contributions from regulated revenues.

4.2.1 Stakeholder comments

Many stakeholders[2] considered that the jurisdictional specific treatment of capital contributions should be dealt with during the reset process rather than through modifications to the PTRM.

C&P noted that the transmission PTRM required amendment to recognise capital contributions as part of its asset and tax calculations. It did not support the approach of deducting the value of contributed assets from ARRs because:

- future customers are burdened where the value of contributed assets fluctuates over time
- tariffs are reduced below their efficient level, creating distortions in consumption
- cash-flows are adversely affected in times of high customer initiated capex
- it requires an ex post review to ensure appropriate incentives, which can result in price volatility due to adjustments for forecast errors.

ETSA Utilities also noted issues with the ex post nature and cash-flow implications of the QCA’s approach.

[2] ENA, Integral Energy, Energex, Ergon Energy, ETSA Utilities, Aurora Energy, Country Energy and the MEU.

The Essential Services Commission of South Australia (ESCOSA) referred the AER to the requirement of the South Australian Electricity Pricing Order to remove capital contributions from the RAB in future resets in that jurisdiction.

UED and Alinta stated that there was a strong case for incorporating capital contributions in the PTRM given their pervasiveness. They suggested a 'phased approach' to give DNSPs in some jurisdictions time to adjust to any decision to implement national consistency in the treatment of capital contributions.

SP AusNet noted that customer initiated works were difficult to forecast.

4.2.2 AER conclusion

The AER notes that the treatment of capital contributions for DNSPs in QLD differs from most, if not all, other NEM jurisdictions. Modifications to the PTRM that will be required to account for the QLD approach appear to be minimal, while those for the common approach require significant changes to the model's asset calculations.

The AER considers that a PTRM that incorporates capital contributions as part of asset calculations would be useful to a greater number of DNSPs and therefore beneficial to develop and consult on as part of the proposed PTRM. Specifically, it would enable the AER to develop and test its suggested approach in the PTRM as part of a single consultation process, rather than undertake the same consultation for multiple jurisdictions at different points in time. DNSPs in QLD would be able to continue their current approach of netting contributions from ARRs with minor amendments to this model.

This conclusion does not indicate any preference by the AER regarding the treatment of capital contributions in accordance with clause 6.21.2. While a national approach to treating capital contributions is desirable in principle, the AER will consider whether this is the case and whether it is feasible once full responsibility for distribution regulation has transferred to the AER in all jurisdictions.

4.3 Cash-flow timing issues

The AER noted in its issues paper that the cash-flow timing assumptions in the transmission PTRM may need to be re-examined in the context of distribution regulation. Specifically, the model contains an internal inconsistency in recognising capex mid year. It was suggested that present value adjustments could also be applied to opex and revenues to better approximate when cash-flows actually occur. The AER noted that several jurisdictional regulators addressed timing issues through the provision of a return on working capital allowance. The AER referred to a report prepared by Allen Consulting Group (ACG) which found that an earlier version of the PTRM contained timing assumptions that negated the need for working capital and was also biased in favour of service providers. The AER was concerned that this bias was likely to be increased by the introduction of a half-year return on capex in more recent versions of the PTRM.

4.3.1 Stakeholder comments

Many stakeholders[3] supported the timing assumptions in the transmission PTRM, stating that they were simple and transparent. Some considered that attempts to address any bias in the modelling (the existence or materiality of which was unclear) would unnecessarily increase the complexity and potential for error in the modelling.

ESCOSA noted that the PTRM would over-compensate DNSPs by assuming revenues occur at the end of the year, since actual revenues are received throughout the year. It suggested that the AER consider modelling all cash-flows as if they occur in the middle of each year to address this bias.

C&P noted that these assumptions did not make allowance for the cost of working capital, and that their effect would depend on the circumstances of each business. Integral Energy disagreed with the findings of ACG and suggested that a more appropriate method of improving the modelling was to introduce a working capital allowance.

The ENA did not support further refinements to the modelling in the context of the current significant changes to the broader regulatory framework. UED and Alinta recommended that the AER should apply the same timing assumptions between the transmission and distribution PTRM for the time being, and examine any changes to both models concurrently in the future. The MEU committed itself to work with the AER in reviewing the impact of these assumptions.

Energex noted that although a timing adjustment was applied to capex (i.e. the capitalisation of a half-year return on capex in each year) the PTRM's depreciation of assets from the year after they are commissioned would have a negative impact on its cash flows. In addition, it considered that the return on capital calculation, which is based on the indexed opening RAB value only, would also negatively affect its cash-flows. It stated that the PTRM should be adjusted to ensure that the return of capital calculation more accurately reflects the use and depreciation of assets in accordance with accounting standard AASB116.

ETSA Utilities made a similar comment that while the timing assumptions of the return on capital and depreciation calculations have no adverse impact in net present value (NPV) terms, they would negatively affect its cash-flows.

SP AusNet supported giving consideration to how to simplify the PTRM, including in terms of cash-flow timing. SP AusNet stated that the AER's issues paper indicated a potential to increase the complexity of the model without identifying any net benefits for stakeholders.

In the context of cash flow timing assumptions, Ergon Energy directed the AER to consider the negative financial implications for DNSPs transitioning to a new regime.

4.3.2 AER conclusion

In response to concerns regarding the PTRM's return on capital and depreciation calculations, the AER acknowledges that some DNSPs may face changes to their

[3] ENA, C&P, Energex, UED, Alinta, MEU and ETSA Utilities.

cash-flows in the transition to a different set of timing assumptions. Specifically, this may arise because the PTRM capitalises half-yearly returns on capex in each year, whereas previously this may have been provided in revenues for that year. Also, the PTRM depreciates assets from the end of the year in which expenditure is recognised.

These assumptions reflect decisions to maintain simplicity in the modelling. Any time lag between when expenditures actually occur and when depreciation commences should be reduced by the use of a full as-incurred approach. DNSPs will be no worse or better off over the regulatory period in NPV terms under these particular timing assumptions. In terms of cash-flow effects, it is unclear whether they are material enough to warrant modifications to the PTRM, particularly as actual revenues received are influenced by the form of control mechanism and, in particular, the values of X factors.

Given the response from stakeholders, the AER considers that at present it may be beneficial to defer consideration of the issue of cash-flow timing assumptions until after the final distribution PTRM is published. This will enable the AER to engage stakeholders in the context of the same potential amendments to the transmission PTRM. At this stage, the issue of cash-flow timing assumptions is considered by the AER to be less material than other elements of the PTRM that are being addressed as part of this consultation.

4.4 Inflation

The AER's issues paper noted that previous versions of the transmission PTRM derived inflation through nominal and indexed CGS. However, in response to potential problems with this method the transmission PTRM requires inflation as a direct input.

4.4.1 Stakeholder comments

C&P noted that the transmission PTRM incorporates a potentially biased inflation forecast through the use of indexed CGS and that businesses should be able to insert inflation forecasts as a direct input to the PTRM. UED and Alinta also noted recent studies regarding the bias resulting from the use of CGS.

Integral Energy noted that it would submit advice on issues in using CGS to estimate inflation as part of its coming reset, and suggested the AER consider this in the context of distribution regulation more generally.

Ergon Energy sought clarification of the AER's interpretation of clause 6.4.2(b)(1) which requires the PTRM to include a method that the AER determines will result in the best estimates of expected inflation. It also sought clarification of the inclusion of a building block component for indexation of the RAB.

Energex considered that the method discussed in clause S6.2.3 is only applicable to the RFM, and that references to inflation adjustments should specify whether they are done using actual or forecast values.

The MEU noted that the significance of inflation forecasts in the PTRM was greater if indexed CGS were used in calculating the cost of capital, and sought confirmation that a nominal weighted average cost of capital would be used in the PTRM.

4.4.2 AER conclusion

The AER does not propose to estimate forecast inflation in the PTRM using indexed CGS. Instead the PTRM requires an input of expected inflation which the AER will assess using a range of factors, including the latest estimates of forecast inflation by the Reserve Bank of Australia.

In response to the MEU's concerns, the AER will still be required to incorporate a best estimate of forecast inflation in its distribution determinations regardless of the impact of forecast inflation in the PTRM.

The AER notes that the indexation of the RAB building block is deducted from nominal depreciation in the asset calculations of the PTRM to derive a "regulatory depreciation" building block. This reflects the AER's past practice and avoids any confusion that may arise by explicitly listing a building block that is negative, which, while technically correct, appears counter-intuitive.

In response to Energex's comments, the PTRM incorporates forecast calculations of the RAB using the method outlined in clause S6.2.3, which are necessary for the calculation of several building blocks, including indexation of the RAB under clause 6.4.3(b)(1), which is equivalent to the amount under clause S6.2.3(c)(4).

4.5 Form of control and X factors

In its issues paper the AER questioned whether it would be useful for the PTRM to incorporate indicative X factor calculations under common forms of control.

4.5.1 Stakeholder comments

Energex sought clarification on how the PTRM would accommodate various forms of price control and service classifications. It stated that incorporating indicative X factor calculations would be beneficial to DNSPs. Integral Energy, UED, Alinta, Country Energy and the MEU also considered that X factor calculations would be useful, with UED and Alinta considering that this could be done to incorporate a range of alternative forms of control.

Ergon Energy did not consider it practical for the PTRM to incorporate X factors under a weighted average price cap control given the complexities involved, such as those created by the introduction of new tariffs, service classifications and volumes. ETSA Utilities stated that the PTRM should be limited to calculating ARRs and that the forms of control be incorporated as part of regulatory submissions. Aurora Energy also considered that there would be no benefits in incorporating X factors in the PTRM. ESCOSA stated that it was unclear how X factors could be calculated in advance of ARRs.

The MEU considered that DNSPs have a greater possibility of manipulating tariffs to their advantage under control mechanisms other than revenue caps. It suggested the AER undertake the following to address this:

- devote considerable effort to promoting cost reflectivity in prices
- require DNSPs to fully substantiate changes in tariffs through pricing methodologies
- investigate actual revenues against changes in volumes, with a threat of more stringent reporting requirements in the event of anomalies.

The MEU also considered that a single form of control was preferable.

4.5.2 AER conclusion

There appear to be advantages from specifying indicative methods to calculate X factors under the three basic forms of control that are widely used, namely revenue caps, weighted average price caps and revenue yields. It is expected that these calculations will resemble, to a large extent, the actual forms of control to be determined under clause 6.2.5. The AER and DNSPs will need to amend the PTRM during each reset process to ensure that the actual form of control is appropriately applied.

In response to the MEU’s concerns, the AER is aware that various forms of control present different risk sharing arrangements between DNSPs and users, as well as different incentives for potential gaming of the regulator. These issues will need to be discussed in consultation regarding the AER’s determination of the forms of control for each DNSP under clause 6.2.5.

4.6 Tax calculations

This section outlines stakeholder comments and the AER’s considerations regarding the PTRM’s tax calculations. The AER did not ask any specific questions on this topic in its issues paper.

4.6.1 Stakeholder comments

Energex sought clarification on how the estimated cost of corporate income tax would be calculated (cash or accrual), including the methodology and assumptions. It also noted that the PTRM’s tax depreciation calculations would not align with values reported under corporate tax practices.

Ergon Energy sought clarification of the meaning of clause 6.5.3(2), which states that the cost of corporate income tax must take into account depreciation of assets included in the RAB, and whether this refers to asset values for tax purposes.

Integral Energy noted that there would be a significant burden in requiring DNSPs moving to a post-tax approach to perform a detailed roll-forward of tax asset values. It also noted that there would always be a difference between assets valued for regulatory and tax purposes.

ETSA Utilities noted that it intended to engage with the AER regarding its transition to a post-tax revenue framework. It noted that tax legislation allowed businesses to use two methods for tax depreciation and that the PTRM should allow this choice.

UED and Alinta referred to transitional clause 11.17.2 which requires the PTRM to allow for certain values and methods used by the Essential Services Commission when calculating the cost of corporate income tax for Victorian DNSPs.

The MEU stated its concerns that the transition to a post-tax framework would provide a net benefit to some DNSPs which should be taken into account by the AER.

4.6.2 AER conclusion

The proposed PTRM calculates corporate income tax on a cash basis. Tax depreciation is calculated as a deduction on the basis of asset values for tax purposes, using a straight-line method as a default. Consistent with the approach to regulatory depreciation, DNSPs may alter the tax depreciation calculations to incorporate alternatives for assessment as part of their regulatory proposals. The AER acknowledges that asset values for tax and regulatory purposes diverge over time.

The tax depreciation calculations may also require amendment to comply with transitional provisions. The AER considers that these modifications are more appropriately dealt with during the framework and approach stage of each reset rather than through accommodating each jurisdiction-specific circumstance in the published PTRM.

The calculation of opening tax values for those businesses transitioning from a pre-tax revenue framework will need to be undertaken using a method agreed to by the AER under transitional requirements or as part of reset processes. Other DNSPs are expected to perform roll-forward calculations for tax purposes under the RFM. Transitional issues regarding the RFM are discussed in a separate explanatory statement by the AER. The AER has also released a separate discussion paper in the context of transitional guidelines for the ACT and NSW distribution resets regarding the impact of transitioning to a post-tax approach as well as issues in setting tax asset values for affected DNSPs.[4]

4.7 Linkages with information requirements

In its issues paper the AER noted several areas of the PTRM that would potentially result in specific information being requested from DNSPs, including for the following:

- substantiation of asset values for tax purposes
- reporting capex on both an as-incurred and as-commissioned basis
- various adjustments (e.g. to RAB values) may be required in moving from existing to new service classifications under the amended chapter 6
- X factors and information for tariff approvals
- reconciliation of capex and opex to data provided in revenue submission documents and templates
- reconciliation of asset data to the methods and values prescribed in the NER.

[4] This paper can be found at appendix A of the AER's Preliminary Positions Paper for the NSW ACT transitional guidelines, available at http://www.aer.gov.au/content/index.phtml/itemId/716987/fromItemId/716969.

4.7.1 Stakeholder comments

Energex was concerned that the information reported in the PTRM may be used for performance reporting without consultation with DNSPs.

Integral Energy commented generally that information requirements should be streamlined wherever possible and built on existing jurisdictional requirements. ETSA Utilities also suggested the AER regard the format of existing requirements and the ability of DNSPs to modify these. The MEU noted that the cost of complying with information requirements would ultimately be borne by customers, but expected this cost to be once-off and ultimately provide for improved regulatory outcomes.

UED and Alinta commented that they were unaware of information requirements in excess of those listed in the AER’s issues paper.

4.7.2 AER conclusion

The AER intends to undertake a separate consultation process with businesses regarding the development of DNSP information requirements under the NEL, including for annual performance reporting. The relationship between these requirements and the PTRM will be taken into account in recognition of the need to streamline requests and avoid duplication where appropriate.

5 AER preliminary positions

In response to stakeholder comments and in the context of the AER's conclusions listed in previous sections, the AER has decided to publish the proposed PTRM at Appendix B under the consultation procedures in clause 6.16(b)(1). The AER has published a proposed PTRM handbook to accompany this model at Appendix C.

Appendix A: Submissions received on the PTRM

The following interested parties provided submissions on the AER's issues paper that was released in November 2007:

- ActewAGL
- Alinta
- Aurora Energy
- Country Energy
- CitiPower and Powercor
- Energex
- Energy Networks Association
- Ergon Energy
- Essential Services Commission of South Australia
- ETSA Utilities
- Integral Energy
- Major Energy Users Inc.
- SP AusNet
- United Energy Distribution.

Copies of these submissions are available on the AER's website at www.aer.gov.au.

Appendix B: Proposed post-tax revenue model

Appendix C: Proposed post-tax revenue model handbook