

## **Company information**

SA Power Networks is the registered Distribution Network Service Provider for South Australia. For information about SA Power Networks visit <a href="mailto:sapowernetworks.com.au">sapowernetworks.com.au</a>

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#### Disclaimer

This document forms part of SA Power Networks' Regulatory Proposal to the Australian Energy Regulator for the 1 July 2020 to 30 June 2025 regulatory control period. The Proposal and its attachments were prepared solely for the current regulatory process and are current as at the time of lodgement.

This document contains certain predictions, estimates and statements that reflect various assumptions concerning, amongst other things, economic growth and load growth forecasts. The Proposal includes documents and data that are part of SA Power Networks' normal business processes and are therefore subject to ongoing change and development.

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## Note

This attachment forms part of our Proposal for the 2020-25 Regulatory Control Period. It should be read in conjunction with the other parts of the Proposal.

Our Proposal comprises the overview and attachments listed below, and the supporting documents that are listed in Attachment 18:

Document	Description
	Regulatory Proposal overview
Attachment 1	Annual revenue requirement and control mechanism
Attachment 2	Regulatory Asset Base
Attachment 3	Rate of Return
Attachment 4	Regulatory Depreciation
Attachment 5	Capital expenditure
Attachment 6	Operating expenditure
Attachment 7	Corporate income tax
Attachment 8	Efficiency Benefit Sharing Scheme
Attachment 9	Capital Expenditure Sharing Scheme
Attachment 10	Service Target Performance Incentive Scheme
Attachment 11	Demand management incentives and allowance
Attachment 12	Classification of services
Attachment 13	Pass through events
Attachment 14	Alternative Control Services
Attachment 15	Negotiated services framework and criteria
Attachment 16	Connection Policy
Attachment 17	Tariff Structure Statement Part A
Attachment 17	Tariff Structure Statement Part B - Explanatory Statement
Attachment 18	List of Proposal documentation

# **Contents**

List of	figures	5
12	Classification of services	6
	Overview	
12.2	Background	. 6
12.3	Original Proposal	. 6
12.4	AER's Draft Decision	. 8
12.5	Revised Proposal	. 9
Appen	dix A. SA Power Networks list of services	10
Shorte	ned Forms	21

# **List of figures**

Figure 12-1: SA Power Networks proposed service classification	
Figure 12-2: AER Draft Decision on service classification	8

## 12 Classification of services

#### 12.1 Overview

Original Proposal	AER Draft Decision	Revised Proposal
SA Power Networks' proposed classification of services for the 2020-25 regulatory control period (RCP) (as summarised in Figure 12-1) followed lengthy consultation with the Australian Energy Regulator (AER) and stakeholders.	The AER accepted our proposed service classifications but made minor adjustments to the specific wording and grouping of some services we proposed.	We accept the AER's decision on our service classifications, subject to correcting some minor drafting issues which we believe to be inadvertent omissions / transcription errors.

This Attachment outlines SA Power Networks' proposed classifications and descriptions for the services which we may provide to customers during the 2020-25 RCP.

# 12.2 Background

Service classification is the process by which the AER decides 'what to regulate' depending on the degree of regulatory oversight required for a particular class of service. This is distinct from the process of deciding 'how to regulate' a service by choosing whether and how our prices or revenues for that service will be capped. The classification process involves decisions as to:

- how our services should be described and grouped into 'like' categories; and
- which of the following classifications should apply to each service:
  - direct control services (DCS)—these services are subject to direct regulatory oversight of revenues / prices, and comprise shared services (standard control services or SCS) and services initiated by and attributable to specific customers (alternative control services or ACS);
  - negotiated distribution services (NDS)—these services are subject to a negotiate / arbitrate framework whereby the AER does not directly set prices but approves a negotiating framework and criteria that we must apply in negotiating terms and conditions (including price) for the provision of these services to customers. The AER only becomes directly involved in the case of a dispute; and
  - unclassified / unregulated services—these are services subject to competition and therefore do not require regulation.

# 12.3 Original Proposal

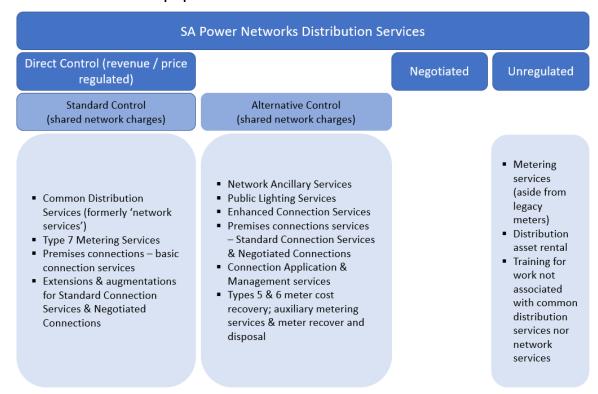
SA Power Networks proposed that services be classified as summarised in Figure 12-1.1

#### In summary:

- the key difference between our service classifications for the 2015-20 RCP and the 2020-25 RCP was the reclassification of all of our current NDS which include ancillary network services, public lighting services, types 1-4 metering and some connection services; and
- based on our Original Proposal, the vast majority of services currently classified as NDS would be directly regulated by the AER for the 2020-25 RCP, as ACS.

The full list of our proposed services, their classifications and descriptions, is contained in our Original Proposal. SA Power Networks' 2020-25 Regulatory Proposal: Attachment 12—Classification of Services, 31 January 2019, Appendix A.

Figure 12-1: SA Power Networks proposed service classification<sup>2</sup>



We arrived at our Original Proposal following a lengthy consultation process with the AER and our customers and other stakeholders since late 2017:

- We submitted a letter to the AER on 31 October 2017 to initiate the Framework and Approach (F&A) process and outlined our initial views relating to service classification based on our understanding of the AER's intended approach (as evidenced in the AER's determinations for other distribution network service providers, DNSPs).
- The AER issued its Preliminary F&A for consultation in March 2018, outlining how the AER proposed to classify services for the 2020–25 RCP.
- Our customers and other stakeholders submitted their views on the AER's Preliminary F&A via a public forum and submissions to the AER from March to April 2018.
- We conducted our own public forum with customers and stakeholders on 17 April 2018. During this
  forum we discussed specific issues relating to public lighting services including how those services
  should be classified and the scope of our intended service offerings / choices for the 2020–25 RCP.
   This forum helped us to understand what we needed to accommodate within an ACS framework.
- We provided a submission4 in relation to the Preliminary F&A on 27 April 2018 setting out our views concerning the AER's proposed service classification.
- The AER issued its Final F&A in July 2018 outlining its proposed service classifications—the AER can
  only depart from these service classifications if there have been unforeseen circumstances justifying
  departing from the service classifications.5 At the time the Final F&A was issued, the first Service
  Classification Guideline was still being developed. The AER anticipated that adjustments to the
  classification of services may be required for the purposes of our Revised Proposal.
- The AER issued the final Service Classification Guideline in September 2018. The stated aim of the final Service Classification Guideline was to achieve greater consistency across DNSPs by setting out a 'baseline list of services' containing service descriptions and classifications that DNSPs should

The AER does not classify unregulated distribution services. Services listed under this category were identified only for the purposes of transparency. This is a non-exhaustive list of services that may fall into this category.

<sup>&</sup>lt;sup>3</sup> SAPN, Letter to AER—Request to replace Framework and Approach, 31 October 2017.

<sup>&</sup>lt;sup>4</sup> SAPN, Submission to AER Preliminary Framework and Approach, 27 April 2018.

National Electricity Rules (NER) 6.12.3(b).

- adopt, noting that the AER would accept alternative approaches where there are good reasons to depart from the approach in the final Service Classification Guideline. A key feature of the Service Classification Guideline is that it took a differing view on the AER's view as expressed in the Final F&A as to how Connection Services should be classified in South Australia.
- Our Original Proposal in January 2019 outlined our proposed service classifications and descriptions
  for our services. Our proposed service classifications all aligned with the AER's Service Classification
  Guideline with the exception of 'Basic Connections'—we proposed that Basic Connections involving
  work to connect a premises remain classified as SCS as per current arrangements in South Australia.
- The AER provided consumers and stakeholders with an opportunity to comment on our Original Proposal during the period of February to May 2019. Issues relating specifically to service classification were not raised in submissions to the AER.
- The AER issued its draft decision on our Original Proposal (including our proposed service classifications) in October 2019 (**Draft Decision**).

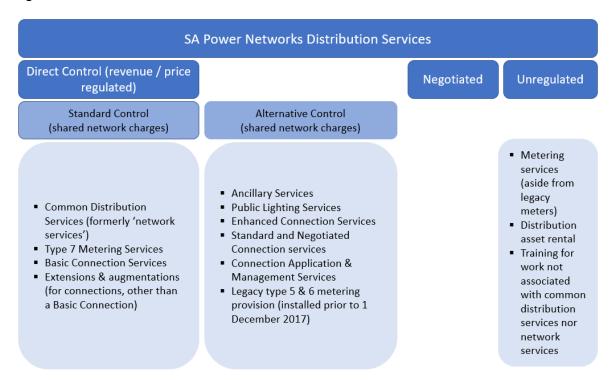
#### 12.4 AER's Draft Decision

The AER's Draft Decision<sup>6</sup> classified SA Power Networks' services as summarised in Figure 12-2.

In summary, the AER:

- accepted our proposed service classifications; and
- made several minor adjustments to the specific wording and grouping of the services we proposed.<sup>7</sup>

Figure 12-2: AER Draft Decision on service classification<sup>8</sup>



<sup>&</sup>lt;sup>6</sup> AER, *Draft Decision—SA Power Networks Distribution Determination 2020 to 2025,* Attachment 12: Classification of services (Attachment 12), October 2019

A full list of SA Power Networks' services and the AER's adjustments to the wording and grouping of these services is set out in the AER's Draft Decision—adjustments are highlighted as tracked-changes. (Attachment 12, Appendix A).

The AER does not classify unregulated distribution services. Services listed under this category were identified only for the purposes of transparency. This is a non-exhaustive list of services that may fall into this category.

## 12.5 Revised Proposal

SA Power Networks accepts the AER's Draft Decision on service classifications for the purposes of the revision of our Revised Proposal, subject to the correction of minor wording issues which we understand to be inadvertent omissions / transcription errors by the AER.

Appendix A to this Attachment sets out the full list of our services, including their classification, groupings and descriptions, with corrections highlighted in red text as tracked changes against the AER's version in the Draft Decision to address the inadvertent omissions / transcription errors.

#### For example:

- We have reinstated the word 'related' in the term 'connection application services' as we had
  proposed in our Original Proposal. In its Draft Decision, the AER accepted that those services were
  to be renamed 'connection application related services', 9 however it appears to have then
  inadvertently omitted to make that amendment.
- We have deleted the row dealing with the 'Third party funded network upgrades or other improvements' service group, as this is an inadvertent replication of 'Third party funded network alterations or other improvements' service group.

We have had dialogue with the AER in relation to these items as well as the other items that we have corrected in Appendix A below.

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<sup>&</sup>lt;sup>9</sup> AER, Attachment 12, page 13.

# **Appendix A. SA Power Networks list of services**

The table below is taken from the AER Draft Decision, and corrections for minor wording transcription omissions / errors are marked-up (in red).

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
Common distribution serv	ice – use of the distribution network for the conveyance/flow of electricity (including the servi	ces relating to ne	twork integrity)
Common distribution service (formerly 'network services')	<ul> <li>The suite of activities that includes, but is not limited to, the following:</li> <li>the planning, design, repair, maintenance, construction, and operation of the distribution network</li> <li>the relocation of assets that form part of the distribution network but not relocations requested by a third party (including a customer)</li> <li>ongoing inspection of private electrical works (not part of the shared network) required under legislation for safety reasons</li> <li>works to fix damage to the network (including emergency recoverable works)</li> <li>support for another network during an emergency event</li> <li>procurement and provision of network demand management activities for distribution or system reliability, efficiency or security purposes</li> <li>training internal staff and contractors delivering direct control services</li> <li>activities related to 'shared asset facilitation' of distributor assets</li> <li>emergency disconnect for safety reasons and work conducted to restore a failed component of the distribution system to an operational state upon investigating a customer outage</li> <li>bulk supply point metering</li> <li>rectification of simple customer fault (eg fuse) relating to a life support customer or other critical health and safety issues that the distributor is able to address</li> </ul>	SCS	SCS

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	<ul> <li>establishment and maintenance of national metering identifiers (NMIs) in market and/or network billing systems, and other market and regulatory obligations</li> </ul>		
	investigation of customer-reported network faults.		
	Such services do not include a service that has been separately classified including any activity relating to that service.		
Connection Services—ser	vices relating to the electrical or physical connection of a customer to the network		
Basic connection services	Means a connection service related to a connection (or a proposed connection) between a distribution system and a retail customer's premises (excluding a non-registered embedded generator's premises) in the following circumstances:  (a) either:  (1) the retail customer is typical of a significant class of retail customers who have sought, or are likely to seek, the service; or  (2) the retail customer is, or proposes to become, a micro embedded generator; and Connection Services include:  (b) the provision of the service involves minimal or no augmentation of the distribution network; and  (c) a model standing offer has been approved by the AER for providing that service as a basic connection service.	Standard Control/ Negotiated distribution service	Premises Connections = SCS + customer contributions
Standard connection services	Means a connection service (other than a basic connection service) for a particular class (or subclass) of connection applicant and for which a model standing offer has been approved by the AER.	Not currently offered	Premises connections = ACS Extensions & Augmentations = SCS + customer contributions

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
Negotiated connection services	Means a connection service (other than a basic connection service) for which a distributor provides a connection offer for a negotiated connection contract.	Not currently offered	Premises connections = ACS Extensions & Augmentations = SCS + customer contributions
Enhanced connection services	<ul> <li>Other or enhanced connection services provided at the request of a customer or third party that include those that are:</li> <li>Provision of connection services above minimum requirements – customer requests increase in reliability or quality of supply beyond the standard, and/or above minimum regulatory requirements (eg reserve feeder);</li> <li>Provided with higher quality of reliability standards, or lower quality of reliability standards (where permissible) than required by the NER or any other applicable regulatory instruments;</li> <li>In excess of levels of service or plant ratings required to be provided by SA Power Networks;</li> <li>For large embedded generators (30 kW 3 phase or above 5 kW 1 phase and above); or</li> <li>Other additional customer dedicated connection lines / assets.</li> </ul>	NDS	ACS
Connection application and management services	Works initiated by a customer or retailer which are specific to the connection point. Includes, but is not limited to:  connection application related services  de-energisation  re-energisation	NDS	ACS

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	<ul> <li>temporary connections (of a size less than the shared network augmentation threshold) as a basic connection service eg builder's supply, fetes, etc.</li> </ul>		
	remove or reposition connection		
	overhead service line replacement – customer requests the existing overhead service to be replaced (eg as a result of a point of attachment relocation). No material change to load		
	protection and power quality assessment		
	supply enhancement (eg upgrade from single phase to three phase)		
	<ul> <li>customer requested change requiring secondary and primary plant studies for safe operation of the network (eg change protection settings)</li> </ul>		
	upgrade from overhead to underground service		
	<ul> <li>rectification of illegal connections or damage to overhead or underground service cables</li> </ul>		
	<ul> <li>calculation of a site specific distribution loss factor on request in respect of a generating unit up to 10 MW or a connection point for an end-user with actual or forecast load up to 40 GWh per annum capacity, as per clause 3.6.3(b1) of the NER</li> </ul>		
	power factor correction.		
Metering Services <sup>10</sup> —actinetwork meters)	ivities relating to the measurement of electricity supplied to and from customers through the di	istribution syste	m (excluding
Type 1 to 4 metering services	Type 1 to 4 metering installations and supporting services are competitively available.	NDS & ACS	Unregulated

SA Power Networks will continue to be responsible for type 5 and 6 meters until they are replaced (and entitled to levy associated charges). We refer to these meters as 'legacy meters'. New meters (that will be type 1 to 4 meters) installed from 1 December 2017 are referred to as 'contestable meters'.

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
Type 5 and 6 meter installation and provision (prior to 1 December 2017)	Recovery of the capital cost of type 5 and 6 metering equipment installed (including metering with internally integrated load control devices).	ACS	ACS
Type 5 and 6 meter maintenance, reading and data services (legacy meters)	<ul> <li>Meter maintenance covers works to inspect, test, and maintain metering installations.</li> <li>Meter reading refers to quarterly or other regular reading of a metering installation including field visits and remotely read meters.</li> <li>Metering data services includes for example: services that involve the collection, processing, storage and delivery of metering data, the provision of metering data in accordance with regulatory obligations, remote or self-reading at difficult to access sites, and the management of relevant NMI Standing Data in accordance with the NER.</li> </ul>	ACS	ACS
Type 7 metering services	Administration and management of type 7 metering installations in accordance with the NER and jurisdictional requirements. Includes the processing and delivery of calculated metering data for unmetered loads, and the population and maintenance of load tables, inventory tables and on/off tables.	SCS	SCS
Auxiliary metering services (Type 5 to 7 metering installations)	<ul> <li>Activities include:</li> <li>Off-cycle meter reads for type 5 and 6 meters.</li> <li>Requests to test, inspect and investigate, or alter an existing type 5 or 6 metering installation.</li> <li>Testing and maintenance of instrument transformers for type 5 and 6 metering purposes.</li> <li>Type 5 to 7 non-standard metering services.</li> <li>Works to re-seal a type 5 or 6 meter due to customer or third-party action (eg by having electrical work done on site).</li> <li>Change distributor load control relay channel on request that is not a part of the initial load control installation, nor part of standard asset maintenance or replacement.</li> </ul>	NDS	ACS

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
Emergency supply restoration in relation to metering equipment not owned by the distributor (contestable metering)	The distributor is called out by a customer or their agent (eg retailer, Metering Coordinator or Metering Provider) due to a power outage where an external Metering Provider's metering equipment has failed or an outage has been caused by the Metering Provider and the distributor has had to restore power to the customer's premises. This may result in an unmetered supply arrangement at this site.	Not previously classified in SA	ACS
Meter recovery and disposal – type 5 and 6 (legacy meters)	<ul> <li>Activities include the removal and disposal of a type 5 or 6 metering installation:</li> <li>At the request of the customer or their agent, where an existing type 5 or 6 metering installation remains installed at the premises and a replacement meter is not required.</li> <li>At the request of the customer or their agent, where a permanent disconnection has been requested where it has not been removed and disposed of by the incoming metering provider.</li> </ul>	Not previously classified in SA	ACS
Third party requested outage for purposes of replacing a meter	At the request of a retailer or metering coordinator provide notification to affected customers and facilitate the disconnection/reconnection of customer metering installations where a retailer planned interruption cannot be conducted.	Not previously classified in SA	ACS
Network ancillary services	- Services closely related to common distribution services but for which a separate charge app	plies.	
Access permits, oversight and facilitation services	<ul> <li>A distributor issuing access permits or clearances to work to a person authorised to work on or near distribution systems including high and low voltage.</li> <li>A distributor issuing confined space entry permits and associated safe entry equipment to a person authorised to enter a confined space.</li> <li>A distributor providing access to switch rooms, substations and other network plant to a non-LNSP party who is accompanied and supervised by a distributor's staff member. May also</li> </ul>	Negotiated distribution service	ACS

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	<ul> <li>Specialist services (which may involve design related activities and oversight/inspections of works) where the design or construction is non-standard, technically complex or environmentally sensitive and any enquiries related to distributor assets.</li> <li>Facilitation of generator connection and operation on the network.</li> <li>Facilitation of activities within clearances of distributor's assets, including physical and electrical isolation of assets.</li> </ul>		
Third party funded network upgrades or other improvements.	Upgrades or alterations to the shared distribution network to enable third party infrastructure (e.g. NBN Co telecommunications assets) to be installed on the shared distribution network.  This does not relate to upstream distribution network augmentation.	NDS	ACS
Network safety services	<ul> <li>provision of traffic control and safety observer services by the distributor where required</li> <li>fitting of tiger tails or aerial markers as requested by a customer or directed by the OTR</li> <li>high load escorts</li> <li>de-energising wires for safe approach</li> <li>Customer requested network inspection undertaken to determine the cause of a customer outage where there may be a safety and or reliability impact on the network or related component and associated works to rectify a customer caused impact to the network<sup>11</sup></li> </ul>	NDS	ACS
Sale of approved materials or equipment	Includes the sale of approved materials/equipment to third parties for connection assets that are gifted back to become part of the shared distribution network.	NDS	ACS
Notices of arrangement and completion notices	Examples include:	NDS	ACS

An ACS charge is not applicable where it is determined that the customer outage was caused by a fault on the network

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	<ul> <li>Work of an administrative nature where a local council requires evidence in writing from the distributor that all necessary arrangements have been made to supply electricity to a development. This includes: receiving and checking subdivision plans, copying subdivision plans, checking and recording easement details, assessing supply availability, liaising with developers if errors or changes are required, and preparing notifications of arrangement.</li> </ul>		
	<ul> <li>Provision of a completion notice (other than a notice of arrangement). This applies where the real estate developer requests the distributor to provide documentation confirming progress of work. Usually associated with discharging contractual arrangements (eg progress payments) to meet contractual undertakings.</li> </ul>		
Rectification works to maintain network safety	Activities include issues identified by the DNSP and work involved in managing and resolving pre- summer bushfire inspection customer vegetation defects or aerial mains where the customer has failed to do so.	Not previously classified	ACS
Planned interruption – customer requested	<ul> <li>Where the customer requests to move a planned interruption, and agrees to fund the additional cost of performing this distribution service outside of normal business hours.</li> <li>customer initiated network outage (eg to allow customer and/or contractor to perform maintenance on the customer's assets, work close to or for safe approach, which impacts other networks users).</li> </ul>	NDS	ACS
Attendance at customers' premises to perform a statutory right where access is prevented	A follow up attendance at a customer's premises to perform a statutory right where access was prevented or declined by the customer on the initial visit. This may include the costs of arranging, and the provision of, a security escort or police escort (where the cost is passed through to the distributor).	NDS	ACS
Inspection and auditing services	<ul> <li>Activities include:</li> <li>inspection and reinspection by a distributor of <u>gifted assets</u>, <u>or</u> assets installed or relocated by a third party</li> </ul>	NDS	ACS

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
	<ul> <li>investigation, review and implementation of remedial actions that may lead to corrective and disciplinary action of a third party service provider due to unsafe practices or substandard workmanship</li> </ul>		
	<ul> <li>auditing of a third party service provider's work practices in the field</li> </ul>		
	<ul> <li>after hours examination and/or testing of the consumer mains and main switchboard prior to initial energisation (upon request)</li> </ul>		
	<ul> <li>after hours visual examination of an electrical installation to reconnect it to a source of electricity (upon request)</li> </ul>		
	<ul> <li>re-test at a customer's installation, where the installation fails the initial test and cannot be connected.</li> </ul>		
Provision of training to third parties for network related access	Training services provided to third parties that result in a set of learning outcomes that are required to obtain a distribution network access authorisation specific to a distributor's network. Such learning outcomes may include those necessary to demonstrate competency in the distributor's electrical safety rules, to hold an access authority on the distributor's network and to carry out switching on the distributor's network. Examples of training might include high voltage training, protection training or working near power lines training.	Not classified in SA	ACS
Authorisation and approval of third party service providers design, work and materials	Activities include:	Not previously classified	ACS
	<ul> <li>Authorisation or re-authorisation of individual employees and subcontractors of third party service providers and additional authorisations at the request of the third party service providers (excludes training services)</li> </ul>		
	Acceptance of third party designs and works		
	<ul> <li>Assessing an application from a third party to consider approval of alternative material and equipment items that are not specified in the distributor's approved materials list.</li> </ul>		

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25		
Security lights	Provision, installation, operation and maintenance of equipment mounted on the distribution network used for security services, eg nightwatchman lights  Note: excludes connection services.	Negotiated distribution service	ACS		
Customer initiated or triggered network asset relocations/re-arrangements	Relocation of assets that form part of the distribution network in circumstances where the relocation was initiated by a third party (including a customer), or triggered by a customer's non-compliance with network safety or security standards.	NDS	ACS		
Customer requested provision of electricity network or consumption data	Data requests by customers or third parties including requests for the provision of electricity network data or consumption data outside of legislative obligations.	ACS	ACS		
Third party funded network alterations or other improvements	Alterations or other improvements to the shared distribution network to enable third party infrastructure (eg NBN Co telecommunications assets) to be installed on the shared distribution network. This does not relate to upstream distribution network augmentation.	Not previously classified in SA	ACS		
Public Lighting Services					
Public Lighting	Includes provision, construction and maintenance of public lighting and emerging public lighting technology.	NDS	ACS		
Unregulated Distribution Services - (non-exhaustive list)					
Distribution asset rental	Rental of distribution assets to third parties (eg office space rental, pole and duct rental for hanging telecommunication wires etc.).	Unregulated	Unregulated		
Contestable metering support roles	Includes metering coordinator, metering data provider and metering provider for Type 1 to 4 metering installations.	Unregulated	Unregulated		

Service group	Further description	Current classification 2015–20	AER draft decision classification 2020–25
Type 5 and 6 meter data management to other electricity distributors	The provision of type 5 and 6 meter data management to other electricity distribution network service providers.	Unregulated	Unregulated
Provision of training to third parties for work not associated with common distribution services nor network services	Training programs provided to third parties for work that is not associated with the provision of common distribution services nor network access.	Unregulated	Unregulated

# **Shortened Forms**

ACS Alternative Control Services

AER Australian Energy Regulator

Attachment 12 AER, Draft Decision—SA Power Networks Distribution Determination 2020 to 2025,

Attachment 12: Classification of Services, October 2019

DCS Direct Control Services

DNSP Distribution Network Service Provider

Draft Decision AER, Draft Decision—SA Power Networks Distribution Determination 2020 to 2025

F&A Framework and Approach

LNSP Local Network Service Provider

NBN National Broadband Network

NDS Negotiated Distribution Services

NER National Electricity Rules

NMI National Metering Identifier

Original Proposal Regulatory Proposal for the 2020-25 RCP

OTR South Australian Office of the Technical Regulator

RCP Regulatory Control Period

Revised Proposal SA Power Networks 2020-25 Revised Regulatory Proposal

SCS Standard Control Services