| ID | RIN/Worksheet | Table Ref | Col/Row Ref | Issue/Questions | Recommendation to the AER |
|---|---|---|---|---|---|
| 150 | RIN general | Reset RIN Schedule 1 5.2(a) | | AER's request of the load forecast model. The load forecasting model is owned by NIEIR. NIEIR will not be releasing the forecasting model to Transend or AER. | Transend to supply NIEIR's load forecast methodology document to the extent that it is not commercially in confidence. |
| 151 | RIN general | Reset RIN Schedule 1 | Para 1.3 | Requirement is very broad without materiality bounds. | AER clarify the types of supporting information or documentation it requires in consultation with businesses |
| 154 | RIN general | Reset RIN Schedule 1 | Para 1.5 (All) | This list is an excessive "catch-all" | AER modifies paragraph (clause) to require only a list of those documents that are of material nature, from which the AER would select samples for provision and review. |
| 152 | RIN general | Reset RIN Schedule 1 | Para 1.5(a) | Does this clause refer to requirements of template worksheet 6.1? | AER clarify scope of the clause. |
| 155 | RIN general | Rest RIN Schedule 1 | P 1.5(f) | 1. Refers to distribution.<br>2. Does the AER require a list of material contracts or the actual material contracts (which would require extensive time consuming application of confidentiality guideline) | 1. AER change distribution to transmission in the clause.<br>2. AER change requirement to provision of a list of material contracts |
| 156 | RIN general | Reset RIN Schedule 1 | P 1.6(d) | The requirement and scope of this paragraph is unclear. Does it relate to template 6.5 Assumptions only? | The AER clarify requirements for the clause with cross references as necessary. |
| 157 | RIN general | Reset RIN Schedule 1 | Para 2.1 | The exact information required by this paragraph is unclear. | AER clarify requirement. |
| 158 | RIN general | Reset RIN Schedule 1 | 4.1 (b) | | |
| 160 | RIN general | Reset RIN Schedule 1 | Paragraphs 23.1 & 29 | | Replace references to *distribution system* with *transmission system* |
| 161 | RIN general | Reset RIN Schedule 1 | Paragraph 31.1(b) | | Replace "Essential Energy" with "Transend" |
| 162 | RIN general | Reset RIN: Schedule 1, Appendices F,G, templates - Expenditure categories | | Having SCADA, network control IT and communications, protection and control in Non-network distorts the Network/Non-Network proportions and creates financial mapping issues. No businesses categorise these assets as proposed by the AER. | Make classification and treatment of SCADA/Protection and Control/ Network IT/Network Communications consistent across repex and maintenance and include them in Network not Non-Network. Non-network should only include business support IT and business communication (telephones). |
| 163 | RIN general | Reset RIN Appendix B | Statutory Declaration | | Modify the statutory declaration proforma to provide for the situation where data does not exist and cannot meaningfully be estimated |
| 164 | RIN general | Reset RIN Appendix B | Statutory declaration | | Amend RIN date (28 November 2013) to actual date of issue. |
| 165 | RIN general | Reset RIN Schedule 1 | 29 Forecast Map (and accompanying notes) | The scope of required accompanying notes and different transmission line ratings is unclear. It is not possible to show the different ratings on the map if required for all transmission lines. Does this requirement relate to the information required in data template table 2.3.2 which requires only ratings for augmented lines? It was understood that the AER no longer requires data for all lines for an augex model for transmission. | AER clarify the requirement for forecast map and accompanying notes, in particular the transmission line rating information in consultation with the businesses |
| 166 | RIN general | Reset RIN Schedule 1 | Paragraph 7.2 and 7.3, Table 2.3.1, 2.3.2 instructions | The instructions relating to treatment of installation costs and civil works are unclear or difficult to relate to Transend's situation. 7.2 (l) and 7.3 (m),(n),(o). In the case of transmission support structures much of the installation costs are civil works. Transend contracts all civil works so in which column of Other expenditure in table 2.3.1 do they go? | AER clarify treatment of civil costs and installations particularly where the majority of work is contracted. |
| 168 | RIN general | Reset RIN Appendix F | Paragraph 7.2 (c) | Clause requires 'as commissioned' expenditure data. Transend forecasts total expenditure on an as incurred basis (as required by AER). The values in this sheet will not agree with the total expenditure forecast. Most transmission line project traverse at least two financial years so the potential discrepancies between years could be very large. | AER specify expenditure for worksheet 2.3 to be provided on an as incurred basis, consistent with expenditure forecast requirements |
| 171 | RIN general | Reset RIN Schedule 1 | 18.3 STPIS NCC | Part (b)(vi)(a) requires provision of plant outage investigation report as supporting information for the NCC. Plant performance is a component of the Service Component and Transend already provides investigation reports for exclusion events under the Service Component reporting process. | AER to review requirement for plant outage investigation report |
| 172 | RIN general | Reset RIN Schedule 1 | 18.3 STPIS NCC | Part (b)(vi)(b) requires provision of detailed plant unplanned outage data for each historical outage. This data is already provided by Transend under the Service Component annual reporting requirements. | AER to consider deleting requirement |
| 173 | RIN general | Reset RIN Schedule 1 | 18.3 STPIS NCC | Part (b)(v) requires the provision of highly detailed and extensive operational plant information. Transend considers this an excessive requirement which is not needed to assess Transend's NCIPAP. | AER to reconsider the requirement |

| ID | RIN/Worksheet | Table Ref | Col/Row Ref | Issue/Questions | Recommendation to the AER |
|---|---|---|---|---|---|
| 174 | RIN general | Reset RIN Schedule 1 | 18.3 STPIS NCC | Part (b) requires the provision of limit information in Table 5.2.3 which is named 'Proposed priority projects for the network capability incentive parameter'.<br>Is the limit information required only for the limits associated with the proposed NCIPAP priority projects? Or is the information required for all limits? | AER to clarify requirement in consultation with Transend |
| 82 | 2.2 Repex | 2.2.1 | | There needs to be more clarity of where to allocate repex costs to the electrical equipment categories or to Other | AER consider specifying further categories<br>- Secondary Systems (lumping protection and control, communication, SCADA together)<br>- Transmission lines other<br>- substations other |
| 86 | 2.2 Repex | 2.2.1 | | No historical/forecast project spend information by asset category / voltage has been collated by Transend at this level of detail in the past. Significant effort is required to extract data from financial records and estimate figures for this level of detail . | We recommend the AER include an estimation methodology in the RIN. Such a method could be:<br>Analyse historical/forecast commissioning data and develop a set of ratios on a project by project basis in relation to commissioning value by asset category and then apply this to the spend to derive spend information by asset category / voltage. |
| 94 | 2.2 Repex | 2.2.3 | Total replacement internal costs | Significant assumptions will be required here to populate the template. Average staff levels, labour costs by classification level have historically not been kept at the expenditure category level specified by the RIN. Transend is unsure what is trying to be achieved by collecting this at the category level. It would make more sense at the aggregate, whole of business level. **NOTE: This comment applies to any section where labour cost data is requested.** | AER seek labour cost data at the consolidated whole-of-business level only. |
| 114 | 2.2 Repex | 2.2.1 | | It is possible that in a given year there will be expenditure on an asset category with no unit installed. For instance, a transformer replacement project may occur over a couple of financial years with only one unit to be commissioned. The current spreadsheet format does not allow for this scenario. | AER adjust its unit cost calculation method to allow for repex across multiple years (noting that that multiple year projects are normal for transmission repex). |
| 42 | 2.3 Augex project data | 2.3.1 & 2.3.2 | | There are no instructions regarding colour coding/data entry, e.g. the yellow cells as opposed to the grey cells. | AER clarify in 1.1 Instructions basic entry requirements with reference to colour of cells.<br>Ensure consistent formatting across sheets |
| 43 | 2.3 Augex project data | 2.3.1 & 2.3.2 | | For *Project trigger* , if 'other - specify' is selected, where do we specify the 'driver'? | Include directions to add "other" drivers in comments field if "other - specify" is selected |
| 45 | 2.3 Augex project data | 2.3.2 | | Line ID - is it physical Transmission Line identifier or Circuit identifier that the AER is looking for? Transend has both as some circuits swap between different tower lines as a consequence of different augmentations over time | AER to clarify in consultation with businesses |
| 46 | 2.3 Augex project data | 2.3.2 | | Other expenditure - civil works': We assume this excludes all civil works associated with Towers (as Schedule 1 explicitly states that civil works should be included with Tower costs). If this is the case, what additional civil costs might be included? Might this be construction of access tracks, crane pads? | AER to clarify in consultation with businesses |
| 9 | 2.5 Non-network | All | | Capex disposals: It is unclear whether this is the price we sold the asset at auction or the WDV or some other measure. It is unclear why this measure is included in expenditure worksheets. | Transend would question the value of providing this information and recommends it be removed from the templates. Asset disposals are reflected in the regulatory asset base rather than in expenditure proposals.<br>Alternatively, Transend recommends the instructions or the definitions be updated to provide clarity of what is to be included for capex disposals. |
| 12 | 2.5 Non-network | All | | Difficult to determine from the definitions what is recurrent versus non-recurrent | Provide clarification/definition on recurrent and non recurrent in consultation with businesses |
| 20 | 2.5 Non-network | SCADA & Network Control | | Does telecommunications reside within this area. If so, does it include telecommunications for operational voice, SCADA and teleprotection. | AER clarify whether telecommunications is expected to be included with SCADA and Network Control.<br>Move SCADA, Network Control, telecommunications assets and costs to Network category |

| ID | RIN/Worksheet | Table Ref | Col/Row Ref | Issue/Questions | Recommendation to the AER |
|---|---|---|---|---|---|
| 115 | 2.5 Non-network | 2.5 | | The worksheets include forecasts for non-financial items such as km travelled by vehicle and numbers of client devices. It is unlikely that these values will provide meaningful data for the AER and given a base year forecasting approach for such costs it is also likely to be unnecessary for assessing the forecasts of these costs. | Transend recommends forecasts of these non-financial items be removed from the templates. |
| 169 | 2.5 Non-network | Vehicles and buildings general | | Data collection requirements seem extensive given the total expenditure on vehicles and non-network buildings. The data for vehicles will have to be collected by analysing many different records. | AER consider a targeted approach to assessment if areas of concerns are identified based on total vehicle and building costs |
| 48 | 2.6 Vegetation Management | All | | The template requires the use of geographical zones for vegetation management, and then to provide the information requested in the RIN for each of these zones. Transend does not currently report on vegetation management in this way. The AER has asked for 'contiguous' zones, however we don't believe this aligns with the geography and vegetation diversity across Tasmania.<br>The work to define these zones, allocate each transmission line span and collect/analyse the data grouped by these zones will be difficult within the time available.<br>Tasmanian legislation does not impose any vegetation management requirements for specific regions, likewise Transend's vegetation management practices are standard across the network.<br>**Transend has reviewed the available data, including vegetation type, rainfall and NDVI (Normalised Difference Vegetation Index). This information does not identify any distinct regions with different climatic conditions and the vegetation types are ostensibly distributed across the state to the extent that in many cases the vegetation type changes on a span by span basis.** | AER note Transend's concern that lack of available data together with the proposed metrics will not adequately take Tasmania's vegetation circumstances into account in benchmarking. |
| 51 | 2.6 Vegetation Management | 2.6.3 | | Transend does not currently track vegetation work against individual spans.<br>This will require all previously issued work orders to be allocated to a specific transmission line span. There is significant work involved in this.<br>Transend maintains the vegetation around access tracks as part of its civil maintenance works and as such this is not captured as a vegetation management activity | Transend recommends that:<br>- "Vegetation maintenance for access tracks" is removed from the table and included in the overall track maintenance activity costed in worksheet 2.7<br>- Vegetation maintenance around communication sites will not be included in the transmission line metrics<br>Transend recommends that the definitions be revised/changed to make the following clear:-<br>- "Route length within zone" is the total line length, i.e. parallel lines are treated as separate spans.<br>- "Km of Vegetation corridors" is based on wayleaves which may contain a number of lines. i.e. total corridor length will be less than route length. It does not include deep gullies etc. were no management is undertaken.<br>- the "Average width of Vegetation corridors" is the total width of the corridor subject to vegetation management. This will allow of multiple lines per corridor and lines which are offset in the corridor.<br>- the "Average no of trees per Maintenance Span" includes the removal of large individual trees in a span as well as the broad slashing of small diameter but dense vegetation across entire spans (1000+ trees per span). |
| 58 | 2.6 Vegetation Management | 2.6.7 | | Certain faults are not within the control of TNSPs, eg. wind borne bark and blow-ins from outside the easement, in the same category as roofing steel and agricultural poly sheeting. | Transend recommends that outages caused by wind borne bark and blow-ins from outside the easement are not included. |
| 64 | 2.7 Maintenance | 2.7.1 Transmission lines | | Category consists of elements of varying ages, due to varying component replacement dates | Transend recommends that the age of the main element be used in calculating the average age for each category , e.g. in the case of steel structures this will be the steel tower, as the age of the foundations, insulators or signage will be younger in many cases. |

| ID | RIN/Worksheet | Table Ref | Col/Row Ref | Issue/Questions | Recommendation to the AER |
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| 91 | 2.7 Maintenance | 2.7.1 Substations | Inspection/ Maintenance Cycles | There are a number of different inspection and maintenance cycles involved for the switchbays (circuit breakers, disconnectors, instrument transformers etc). Do we insert additional lines to break the bay down for each different device? If this is required it will also help in filling out the "Quantity of asset groups and the Average age".<br>For the heading [Other maintenance activity 2] do we also insert additional lines in for the auxiliaries required for the operation of the substation? The expenditure for auxiliaries is significant; fault response, battery maintenance, grounds & buildings, operational duties etc. The ages of these assets can be considerably different. An average age is somewhat meaningless. | AER remove this requirement until an appropriate level of information is determined |
| 95 | 2.7 Maintenance | 2.7.1 Protection | | Protection maintenance intervals vary based on technology of the equipment. E.g. 3 years for non-self-monitoring equipment and 6 years for self-monitored equipment. It will be necessary to split out the technologies or come up with a weighted average which will not mean a lot if compared to other organisations with different proportions of technologies. | AER clarify, in consultation with the businesses, its expectations for determining average age of assets with different technologies but the same function. |
| 116 | 2.8 Overheads | 2.8.1 | Corporate Overheads | Transend's RIN did not include a definition for corporate overhead. Accordingly, it is unclear as to what is to be categorised here. It is also unclear as to where *Insurance* , *Self insurance* and *Other non-controllable* opex costs are to be categorised.<br>Transend notes the definition is provided in the draft RIN on the AER website. The definition includes regulatory support which is also included in the definition for asset management support in network overheads. | We recommend the AER include a definition for corporate overhead in Transend's RIN including confirming where regulatory support costs are to be reported. Transend would encourage these costs be reported under asset management support as this is where they have been historically reported. It is also recommended the AER review TNSP regulatory accounts submitted under the Information Guidelines to ensure that the definitions are able to cover all existing cost categories adequately. |
| 148 | 2.8 Overheads | 2.8.1 | Network overheads | Some anomalies exist within the definitions for this worksheet.<br>For instance, the definition for asset management support includes customer costs which are also referenced in the definition for network monitoring and control.<br>Customer billing costs are also included in network monitoring and control costs whereas these costs would normally reside with customer costs. Transend has historically included these with asset management support costs.<br>Asset management support costs also have IT support costs in its definition whereas these could also be considered corporate overheads (pending the definition for these costs).<br>Asset management support costs also have network support in its definition. | Transend recommends the definitions be clarified including customer support and billing services being included in the asset management support category. Transend also recommends further consideration be given to the treatment of network support costs including them being given their own category in the template. |
| 117 | 2.9 Provisions | 2.9.1 | | The information in this table covers a 10-year period going back to 2004-05. Transend questions the relevance of the data prior to 2008/09 given the other financial data in the RIN only begins at 2008/09. Transend questions the relevance in the data for earlier periods, particularly the asset class allocations as the RAB values for these years have already been determined in our final determination for the current period. The allocation to asset class is difficult to determine and will require assumption. This should be requested only where a provision adjustment is identified as being required rather than in advance given the burden on providing this data as it has not historically been collected. | Transend recommends the AER remove the requirement to provide data for periods prior to 2008/09 and only request allocation to asset classes where a provision adjustment has been deemed necessary. |
| 146 | 2.9 Provisions | All | | The worksheet does not allow for the recognition of movements that do not get allocated to opex or capex. For example, Transend's defined benefit liability has movements associated with actuarial measurement (allocated directly to retained earnings) and interest cost (allocated to finance costs) which would be unable to be included in the worksheet. | Transend suggests the worksheet be amended to allow for other provision movement types and allocation to areas other than simply opex and capex. |
| 118 | 2.10 Input cost escalations | 2.10.1 | | The RIN seeks forecast price changes in nominal terms. It would be better to have the forecast escalators here in real terms as this is generally how they are sourced as we are required to prepare forecasts in June 2014 terms with only real escalation applied. | Transend recommends this sheet in the template is amended to require input with real escalation rates rather than nominal. |

| ID | RIN/Worksheet | Table Ref | Col/Row Ref | Issue/Questions | Recommendation to the AER |
|---|---|---|---|---|---|
| 99 | 2.11 Expenditure other persons | 2.11.1 | I15 - Contract Period | We have a mixture of Umbrella Contracts, from which works are raised ("contracts are arranged for minor works, services and equipment) and Agreements from which contracts are formed for specific projects (Panel agreements). It would be difficult to capture details of all contracts raised under an umbrella agreement with a contractor over the reset period. Does the AER require the "period" for the agreement or the multitude of project specific contracts etc? | AER to work with businesses to clarify and provide definitions and instructions particularly to assist with clarity around dealing with project specific contracts under an umbrella agreement |
| 119 | 2.11 Expenditure other persons | 2.11.2 | | This table seeks forecast contractor spend. It would be extremely difficult to forecast which contractors were going to be used in future years given the tendering process involved with major capital works where the majority of contract spend exists.<br>This worksheet is unlikely to add much value to the AER as it would likely be an estimate based upon the current period. | Remove this requirement as it is unlikely to provide useful information. |
| 167 | 2.11 Expenditure other persons | Table 2.11.1 and 2.11.2 - Transactions this period and next | Nature of expenditure | There is no guidance on what the AER means by "nature of expenditure" | Specify range of different "natures" or delete |
| 120 | 2.12 Insurance & Self-insurance | 2.12 etc | | The worksheet seeks forecasts in nominal terms when the revenue proposal and other worksheets are to be prepared in June 2014 dollars.<br>The data requested here goes back to 2004-05 which is prior to the other worksheets in the template. Transend questions the usefulness of this historic data being provided here given the data would have been subject to review in the previous determination.<br>Transend also notes that total insurance premiums in the summary table may not agree to the totals in the tables below as these focus on only 2 types of coverage (liability and property) and it is unclear as to what is to be included in each. The tables seem to indicate a single policy for each which if correct would result in a number of small policies (for travel, directors liability etc.) being excluded.<br>It is also unclear as to where brokerage costs are to be included given Transend treats these as a cost of Insurance. | Transend recommends the data period be shortened to cover the current regulatory period and that the AER provide instructions for filling out this worksheet in the same manner instructions have been provided for the category analysis templates. A section for other policy types (at a summary level) should be included in the template for completeness. The treatment of other costs such as brokerage should also be clarified.<br>Transend also recommends the forecasts be required in June 2014 dollars for consistency. |
| 4 | 3.1 Revenue | 8.1.1 | | This will be a significant task if we need to update all inputs to the pricing models (eg., asset values, network flows) using forecasts for the next period, this requires that the annual pricing models need to be produced for each forecast year, a task that takes a couple of months to complete each year. Given these inputs may have only minor impact on revenue groupings it is proposed that we use the existing pricing inputs for 2013-14 and the forecast maximum allowed revenue and revenue adjustments to derive the forecast revenue groupings. | We recommend the AER include a suitable estimation technique in its RIN. Such a technique could be:<br>Use the 2013/14 pricing inputs and update only forecast maximum allowed revenue and adjustments to revenue (eg., under/over recoveries from prior years and revenue penalties and incentives) to provide forecast revenue groupings. |
| 18 | 3.4 Operational data | 3.4.1 | | Tasmania has a winter maximum demand, which generally occurs in June, July or August. Hence the forecast energy and maximum demand data are derived in calendar years. Historic information can be provided in either calendar years or financial years. | Allow Transend to present the forecast data by calendar year |
| 22 | 3.4 Operational data | 3.4.1 | TOPED0101 | An energy demand forecast of other connected transmission networks is not available. There are significant variations in import/export through Basslink based on weather conditions in Tasmania and other financial drivers of market participants. | AER to consider deleting this request |
| 23 | 3.4 Operational data | 3.4.1 | TOPED0102 and TOPED0103 | Transend's energy forecast (prepared by NIEIR) is not separated into distribution network and directly connected end-users. The forecast provides the total energy forecast for each calendar year and it is separated in to residential, commercial, industrial and public lighting. | AER to consider deleting this request |

| ID | RIN/Worksheet | Table Ref | Col/Row Ref | Issue/Questions | Recommendation to the AER |
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| 26 | 3.4 Operational data | 3.4.3.1 & 3.4.3.2 | TOPSD0104 & TOPSD0204 | All the forecasted MWs are for particular POE value (10, 50 or 90% POE). In this template row, it is asking for non-coincident summated maximum demand without specifying any POE. To generate these numbers, temperature forecast is needed. Such temperature forecast is not available. | AER to consider deleting this request. |
| 28 | 3.4 Operational data | 3.4.3.2 | | Transend does not produce a system reactive power (MVAr) forecast. Transend can produce values for MVAr and MVA at load points (each calendar year) based on an estimated power factors.<br>Transend does not believe the AER can make sensible use of this aggregated data. | The AER remove the requirement for state level MVA forecasts. |
| 29 | 3.4 Operational data | 3.4.3.3 | TOPSD0302 to TOPSD0309 | Clarity is required on AER's expectations. Transend is not sure what AER means by power factor conversions for transmission lines. MVAR flows around a meshed transmission system vary considerably due to varying generation inputs and flows on adjacent circuits. | AER remove this request |
| 131 | 3.5 Physical assets | Table 3.5.1.5 | TPA0505 | What *interconnector capacity* should be entered where there are differing import/export capacities? | AER provide direction on what interconnector capacity to be used where import and export capacities are different. |
| 132 | 3.5 Physical assets | Table 3.5.1.5 | TPA0504 | Transend cannot provide capacity of equipment owned by the end-user, as we do not have this information. | AER consider using contract demand |
| 133 | 3.5 Physical assets | Tables 3.5.1.3 and 3.5.1.4 | | Is there a definition of Weighted average MVA capacity | AER provide definition of weighted average MVA capacity |
| 70 | 3.6 Operating environment | 3.6.1 | TEF0103 | Transend doesn't currently calculate this. It would be extremely difficult to forecast. | AER consider removing this requirement |
| 71 | 3.6 Operating environment | 3.6.1 | TEF0104 | This can be forecast but won't be very helpful to AER, because we group multiple trees into a single 'defect', therefore the future average is likely to be '1' every year. Definition should be made clearer. | Consider using historical vegetation defects, which may include a single defect for multiple trees that infringe clearances, in the forecasting of this measure. |
| 74 | 3.6 Operating environment | 3.6.1 | TEF0107 | There is lack of clarity regarding definition of 'altitude and lack of clarity as to whether it is asking for route or circuit km.<br>Definition says 600m altitude. Should say above 600m altitude. | Transend recommends reporting on this measure by route length. Transend recommends correcting the definition of altitude to altitude above 600m. |
| 75 | 3.6 Operating environment | 3.6.1 | TEF0108 | Tasmania Fire Service does have a bushfire risk map of Tasmania, but we don't believe it is providing the perspective on risk that the AER is looking for. For example, the far south west of the state is marked as being a 'High' bushfire risk. Also, all transmission line corridors are assessed as being 'Extreme' risk, meaning all vegetation under our management will also receive that categorisation, and hence the categorisation becomes meaningless.<br>Transend will need to engage organisation with appropriate expertise to obtain "high bushfire risk area assessment" (as defined in p.32 of RIN). The allowed timeframe is prohibitive and expense may be significant. | Transend recommends that AER clarifies the requirements for this measure and defers it use. |
| 126 | 3.6 Operating environment | Table 3.6.1 | TEF0106 | Definition appears to be lacking regarding vehicle type, unit of measure. 'km' is assumed to be measuring access track length.<br>Definition of standard vehicle access presently includes open paddocks (including gated and fenced paddocks) and infers a two wheel drive vehicle by stating that areas with no standard vehicle access would not be accessible by a two wheel drive. Two wheel drive vehicles cannot (and are not designed to) negotiate farm paddocks. | AER clarify km units refer to access track lengths.<br>Transend recommends that AER alters the definition, and possibly name, of standard vehicle access by clarifying that it includes access by an unmodified 4WD vehicle |
| 127 | 3.6 Operating environment | Table 3.6.2 | TEF0201 | Line Length' has no definition. | Rename 'Line length' to 'Route line length' to match definition of requirement. |
| 128 | 3.6 Operating environment | Table 3.6.2 | TEF0202 | Do we include generation through interconnectors? or regional dispatch only? If interconnector import (generation) is included, there is no way of determining thermal/non thermal components of this. | AER to clarify definition in consultation with businesses |
| 129 | 3.6 Operating environment | Table 3.6.2 | TEF 0203 | Definition may need to be tighter on 'node'. Is 'Hobart' load a node, or even 'greater Hobart' a node. | AER to clarify definition in consultation with businesses |

| ID | RIN/Worksheet | Table Ref | Col/Row Ref | Issue/Questions | Recommendation to the AER |
|---|---|---|---|---|---|
| 104 | 4.1 Asset Age Profile | 4.1.1 | | Transend assumes that the *installed assets -> quantity by year* refers to the number of actual assets in service and not the number of assets commissioned in that year.<br>Transend assumes the *standard life* refers to the actual age of the assets not the expected life from our Asset Management Plans (AMPs).<br>Data for the historical age profile is difficult/impossible to collate. Transend suggests the use of International Transmission Operations and Maintenance Study (ITOMS) data for every second year (ITOMS runs every two years). The ITOMS data will only go back to 2003. (only 110 kV and above)<br>All distribution voltage level equipment will be difficult to provide any historical data and it's not included in the ITOMS data listed above.<br>ITOMS power transformer data categories are for 0-100MVA and 100-350MVA and 350+MVA.<br>What is a GIS module?<br>Oil and SF6 CBs are not listed.<br>Where isolators and earth switches are a combined unit do we count that as two devices? | AER clarifies the definitions in consultation with the businesses |
| 130 | 4.1 Asset Age Profile | Table 4.1.1 | | Steel Towers' name does not match the scope of wording in the definition.<br>'Tower Structures' name does not match the scope of wording in the definition.<br>The units of each category need to be shown. Eg For Cables less than 33kV (within substations) would unit be distance or no. of? We don't have distance of these lower voltage cables, only no. of.<br>Are the yearly columns requiring the number of new assets installed in that year or the total number of assets existing as at that year? Transend assumes the former but seeks clarity. If the latter is required the back casting will take significant effort. | Rename 'Steel Towers' as 'Support Structures' based on the intent of definition.<br>Rename 'Tower Structures' as 'Structure Accessories' based on the intent of the definition.<br>Provide units for each category<br>Clarify whether 'number of new assets in the year' is what is required. |
| 31 | 4.2 MD - Network level | 4.2.1 & 4.2.2 | | Tasmania has a winter maximum demand, which generally occurs in June, July or August. Hence the forecast information is derived in calendar years. Historic information can be provided either in calendar years or financial years. | Allow Transend to provide winter MD by calendar year |
| 33 | 4.2 MD - Network level | 4.2.1 & 4.2.2 | | There are no raw values for future (i.e. estimate and forecast). All maximum demand values are POE base forecasted values. | AER to reconsider the need for this data. |
| 38 | 4.2 MD - Network level | Table 4.2.1 & 4.2.2 | | An MVA forecast for Tasmania is not available. Transend does not produce a reactive power forecast. | Transend can produce values for MVA (each year) based on an estimated power factor. The power factor would be estimated based on historic power factors at the time of state peak. |
| 17 | 4.3 MD & Utilisation-Spatial | 4.3.1 (a) & 4.3.2 (a) | | Information required under "Adjustments"; The connection point forecast includes, but does not identify, embedded generation, transfers and permanent switchings. | AER to consider deleting the request of all adjustments (embedded generation, block loads, switching, transfers and other adjustments) |
| 34 | 4.3 MD & Utilisation-Spatial | Table 4.3.1 (a) & 4.3.2 (a) | Forecasted substation data | There are no raw values for future (i.e. estimate and forecast).All maximum demand values are POE base forecasted values. | AER to consider deleting this requirement |
| 36 | 4.3 MD & Utilisation-Spatial | Table 4.3.2 (a) | | It is unclear what is required in the second table. "Non-coincident maximum demand by ….. ?". Is it by voltage level? Currently Transend does not have the required data by voltage levels. | AER to consider deleting this requirement |
| 144 | 4.3 MD & Utilisation-Spatial | 4.3.1(a) & 4.3.2 (a) | | Connection point forecast is prepared on calendar years. Historic information can be provided either in calendar years or financial years. | AER allow Transend to provide connection point forecast data in calendar years |
| 145 | 4.3 MD & Utilisation-Spatial | 4.3.1 (a) &4.3.2 (a) | | An MVA forecast for connection points is not produced but derived based on assumptions on future power factors. | Transend provide values for MVA (at each connection point) based on an estimated power factors. |
| 147 | 4.3 MD & Utilisation-Spatial | 4.3.1 (a) & 4.3.2 (a) | | Historic weather corrected 10% 50% POE data for connection points are not available. This data can only be derived for each connection point but only with a considerable amount of effort. | AER to reconsider the need for this data. |
| 84 | 4.4 Material projects | 4.4.2 | | If a project transitions the regulatory control periods and is included in Ongoing and Future Projects (4.4.1), does it need to be repeated in Current Projects (4.4.2)? | AER clarify the requirement |

| ID | RIN/Worksheet | Table Ref | Col/Row Ref | Issue/Questions | Recommendation to the AER |
|---|---|---|---|---|---|
| 85 | 4.4 Material projects | 4.4.1-6 | | Is there any guidance in relation to the AER's expectation of the 'Primary expenditure purpose category'? Do we assume simply augmentation, renewal, etc. | AER clarify the requirement in consultation with the businesses |
| 149 | 5.1 EBSS | 5.1.1 | | Incorrect formula in cells E39 to I39.<br>No specific area to amend the EBSS target as a result of lower demand, and therefore lower asset growth % than that used to determine the original EBSS target.<br>2012-13 data will be Actual not an Estimate as the relevant columns are headed. | AER correct the identified errors. |
| 39 | 5.2 STPIS | Table 5.2.1 | | Some measures are new measures for 2014-19 STPIS, so there is currently no history. This may be problematic as the information has not been audited by normal STPIS processes.<br>For circuit outage rate, loss of supply frequency and average outage duration, the information will de derived from data in Transend's system "PerfRep".<br>For "proper operation of protection equipment", the data will need to be created. We may not have appropriate records. | Transend recommends collecting data for the new STPIS parameters under 'Proper operation of equipment' in future years only. These parameters have a 0% weighting. and are for reporting purposes only. |
| 41 | 5.2 STPIS | Table 5.2.4 | | MIC data for 2012 and 2013 will be submitted for audit 31 January. Audit results should be available in May 2014. | Transend provides this with STPIS |
| 153 | 6.1 Policies & Procedures | Table 6.1.1 Plans, Policies and strategies | Columns C, H, I, J | If there has been no material impact from a change to the plans etc in the current regulatory period do columns H-J need to be completed? | AER clarify requirement in instructions/column heading |
| 170 | 6.1 Policies & Procedures | Whole table | | A very large number of documents will need to be assessed for impact. | Limit requirement to documents having a material effect on forecasts. |
| 112 | 6.3 Obligations | Table 6.3.1 - Existing obligations or requirements | 1 | Default agreements are not defined - what is being asked for here? | Clarify definition in consultation with businesses |
| 113 | 6.3 Obligations | Table 2 - New or anticipated obligations or incremental additions to existing obligations or requirements | | The template refers to existing and new obligations the TNSP identifies as having a material impact on expenditure requirements. The Reset RIN document para 1.15 makes reference to step changes and how we need to substantiate step changes. | AER clarify that this template only applies where there is a step change requested |
| 3 | 6.6 Indicative bill impact | 6.6.1 | | Typical electricity bill<br>Transend does not hold information related to a typical electricity bill and does not have an entitlement to request the information. If required to provide this analysis Transend will be reliant on externally sourced data and analysis which it can't verify. For example, the Office of the Tasmanian Economic Regulator undertakes such analysis from time to time (last report was 2010). | AER clarify requirement in instructions |