

Networks Information Requirements Review

Workshop 6: DNSP Category Analysis RIN data

Summary

8 September 2022

Networks Information Requirements Review: DNSP Category Analysis RIN Data Workshop (Workshop 6)

Date of Workshop: 8 September 2022

Attendees

Attendees included representatives from: AER, AusNet Services, Endeavour Energy, Energy Queensland, Evoenergy, Jemena, Power and Water, Powercor, Rosetta Analytics, SA Power Networks and TasNetworks.

Workshop structure

The workshop discussion followed the current distribution Category Analysis RIN template. The group discussed the issues on the issues register and the data use cases for each worksheet in the Category Analysis RIN. The issues register (with responses) and the data use cases relating to both topics were provided to workshop participants prior to the workshop via our website. See [Workshop materials](#).

Topic 1. Repex

Issue #25 – Selected Asset Characteristics – Capacity data

Issue raised by Jemena: It is not clear if the units for this data are asset volumes currently in commission or asset replacements, which are both reported in CA RIN 2.2.2. Please clarify the units required.

AER response: The data being collected mirrors that in table 2.2.2 of the CA RIN. The workbooks will be amended to enable reporting against both Assets in Commission and Asset replacements.

Workshop discussion

The AER noted there are difficulties in interpreting what is required for transformer asset group, where the metric to be reported is assets disposed of and assets replaced. It acknowledged further clarification is needed to ensure the data is meaningful and easily understood by all stakeholders.

ACTION ITEM 1: The AER will review the data definitions and terms and clarify with NSPs what is reported in CA2.2.2 against 'Asset volumes currently in commission' and 'Asset replacements for the transformer asset group.'

Issue #26 – Asset Age

Issue raised by Jemena: It is not clear how the mean and standard deviation economic life asset age data is or could be used or why this information is required. We consider this is one area where the AER can rationalise its information requirements and help improve DNSPs' reporting efficiency.

AER response: AER is reviewing data use case and requirements.

Workshop discussion

This use case continues to be under review.

ACTION ITEM 2: The AER will review the use case for the mean and standard deviation economic life asset age data as requested by the DNSPs.

Issue #154 – Standard Control Services

Issue raised by Energy Queensland: Ergon Energy and Energex are aware the purpose of RIN Templates 2.2 Repex and 5.2 Asset Age Profile is to build the Repex model. To build the model correctly, the assets are grouped by the three characteristics:

1. Function
2. Asset expected life
3. Cost

Where the RIN requirements have been upheld in the AER's proposed RIO, the AER prescribed categories could better reflect network characteristics when measuring information by cost or expected life. Refer below for proposed changes to categories:

1. Adding low cost SWER construction and Non SWER system construction (cost)

2. Grouping 11kV and 22 kV system (similar cost and expected life)
3. Adding 11kV and 22kV power regulator (cost)
4. Adding different type of switchgear (cost and expected life)
5. Splitting field devices into protection relays, RTUs and local master stations (cost and expected life)

Revised tables updated for proposed categories can be provided to the AER on request.

AER response: The AER will maintain the current requirements but are open to working with DNSPs on these suggestions in the upcoming resets to see if there is value in changing the requirements in the future.

Workshop discussion

These proposed changes are outside the scope of this review but may arise through DNSP's individual reset processes, or future reviews of the repex model by the AER.

Issue #251 – Standard Control Services – Repex

Issue raised by Power and Water: From a quick review of this one compared to the current one, it looks pretty similar to the current RIN except that this new format asks for the total to be split into Direct and Indirect whereas in the current RIN, it's just one total.

Public lighting does not apply to PWC.

Poles, pole top structures, service lines, OH conductors, underground cables, transformers, switchgear, SCADA, other repex - If we go to this new format, not sure if this data is readily available? I'm assuming the Capex backcasting model likely has this data, if not, not sure how easy it would be to get this data.

AER response: The data requirements are consistent with existing data requirements, and backcasting is not required at this time. We note that for table 2.2.1 only Direct expenditure is being requested.

Workshop discussion

The AER confirmed the existing data requirement and will discuss this issue further with Power and Water.

Formatting issues – #63, #94, #152, #153

Not discussed.

Data use cases

Energy Queensland queried the approach used by the AER to link 'as incurred' expenditures to 'as commissioned' asset volumes where a project is built over many years.

AER confirmed it uses a 3–5-year average for unit rate assessments, minimising the impact of the timing differences between expenditures and asset commissioning.

Powercor would like specificity around the use case for the mean and standard deviation economic life asset age data when this is available from the AER. (See action item 2).

AusNet Services notes that pass throughs (e.g. for storms and fires) can cause abnormalities in repex. Recent examples have produced distorted unit costs (e.g. for poles) which was likely exacerbated by low staff level due to Covid.

The AER notes it looks for anomalies during its analysis and our typical practise is to approach the NSPs for explanatory material where data looks out of step with other information.

Topic 2. Augex

Issue #135 – Removal of data requirements - Augex

Issue #159/ Issue #160 – Augex asset data - sub-transmission, zone & switching stations/ sub-transmission lines

Issue raised by Energy Queensland: Ergon Energy and Energex similarly support the removal of the following RIN requirements:

- 2.3.1 Augex data – sub-transmission substations, switching stations and zone substations for reporting large sub-transmission projects; and
- 2.3.3. Augex data - HV/LV feeders and distribution substations [units added and units upgraded] [multiple], units by project type.

Issue raised by Power and Water: Format the AER requires data is time consuming to break down and is not presented nor reported in the format the RIN requires in our systems.

Also, the dollar figures are reported elsewhere in the RINs if needed and there is an issue around material vs non-material projects. I.e. lots of info required for projects that are low value and its very time consuming to disaggregate this data.

AER response: This requirement has been excluded from future reporting requirements.

Workshop discussion

AER confirms it will omit CA tables 2.3.1 and 2.3.2 from the data requirements as we are able to obtain this information from the capex model and the detailed information that comes to us through the reset process. However, CA table 2.3.3 will be maintained as a data requirement.

Issue #254 – Standard Control Services - Augex

Issue raised by Power and Water: If we go to this new format, not sure if this data is readily available? I'm assuming the Capex backcasting model likely has this data, if not, not sure how easy it would be to get this data.

In relation to distribution substations also note: Current RIN of CA2.3.3 also asks for Volumes just for the Descriptor Metrics section whereas in this new format, no volume is asked for in this table so I'm assuming this would make things a bit easier?

AER response: Asset augmentation activity data requirements are set out in data category 02: Operational Outputs.

Workshop discussion

The consultation workbooks outline the data requirements only, these workbooks are not the data submission templates. The data requirement templates are set out so like-data can be shown together, and data validations can be illustrated. Data submission templates will be prepared for ease of data submission.

Data use cases

There was no further discussion on Augex data use cases.

Topic 3. Connections

Issue #23 – Connections

Issue #112 – Connection data

Issue raised by Jemena: The information requested in this section splits the new SCS connections data into overhead and underground categories. However, CA RIN 2.5 currently provides total connections volumes based on an overhead and underground split but not an SCS/ACS split. AR RIN (new historic) 2.5 provides new connections based on an SCS/ACS split but not an overhead and underground breakdown. We can provide this data in the new format requested.

Issue raised by SAPN: We have also noticed there is an increase in the data reporting requirements within the new data model, with a greater level of granularity of data proposed to be reported in some cases. SA Power Networks has identified the following instances where additional data reporting obligations are proposed: Connection data provided in the Category Analysis RIN – Table 2.5.2, has been further broken down to overhead and underground connection categories with the new data model.

We encourage the AER to conduct a detailed review of the proposed data model templates, in particular reviewing the additional data requested to confirm that the proposed level of data reporting is actually required to support performance reporting or to inform regulatory decision making.

AER response: Currently information on connections expenditure and activities is collected in the CA RIN from tables 2.5.1; 2.5.2 and 2.12. The data is shown in workbooks 2, 6 and 7. New disaggregations include the collection of ACS expenditure, and underground and overhead connection activities. The new disaggregations reflect development of new services and material differences in the costs of underground and overhead connections.

Workshop discussion

This will be a new data requirement split into overhead and underground activities. This has been requested due to the significant cost difference between overhead and underground activities.

Issue #113 – Capital contributions

Issue raised by SAPN: We have also noticed there is an increase in the data reporting requirements within the new data model, with a greater level of granularity of data proposed to be reported in some cases. SA Power Networks has identified the following instances where additional data reporting obligations are proposed: Capital contribution data is proposed to be reported by connection type as part of the new capital expenditure templates 2. Capital contributions are not currently reported separately within connections data provided in the Category Analysis RIN – Table 2.5.2.

We encourage the AER to conduct a detailed review of the proposed data model templates, in particular reviewing the additional data requested to confirm that the proposed level of data reporting is actually required to support performance reporting or to inform regulatory decision making.

AER response: The data requirements for Connections is based on the AR RIN requirements which disaggregate expenditures into capital contributions. We will update the reference. See also issue #23.

Workshop discussion

SAPN sought confirmation that the AER wants this extra level of disaggregation, and the AER provided that confirmation.

Issue #137 – Connections, New connections

Issue raised by Energy Queensland: Connections, New connections - Excluding standard control services: The mapping to the CA RIN appears to be incorrect. This requirement was not previously included in the CA RIN. It appears to be a hybrid between AR RIN 2.5.2 and CA RIN 2.5.2.

AER response: The information substitutes for the existing collections in the CA and AR RINs.

Workshop discussion

The data requirement will be based on the 'New Historical RIN table 2.5.2' not the old CA RIN table 2.5.2.

Formatting issues – #66, #253, #162

There was no further discussion on these issues

PWC specific issue – #161, #202

There was no further discussion on these issues.

Data use cases

AusNet Services notes the 'New Historic' RIN table 2.5.2 and the old CA RIN table 2.5.2 are almost the same and asks if the AER will remove the duplication.

AER response: Yes, the 'New Historical' RIN table 2.5.2 replaced table 2.5.2 in the CA RIN. The 'New Historical' RIN table is what we are now working from to develop our data requirements under the new instrument.

Topic 4. Non-Network

Issue #163 – Annual descriptor metrics (ICT)

Issue raised by Power and Water:

User numbers

Using the CAM is a more accurate reflection of this metric as the current one does not represent a direct correlation as it includes for example meeting rooms and other users that require an active directory ID to perform a function such as printer use.

Number of devices

Using the CAM is a more accurate reflection of this metric. Also, this category little value as “number of devices” is vague and doesn't tell the whole story (a person can have a mobile phone, a laptop, and potentially a tablet but this could be warranted given their role, as well as the current pandemic. Comparing the number of devices this year to, say, 3 years ago, doesn't really add any value to a consumer.) Reporting this data is also time consuming as it's an overly manual process (21hrs to complete).

Employee numbers

This is a duplication as this number is reported in Labour tables.

AER response: We use this data for high level ICT benchmarking and would like to retain this reporting requirement. We will review duplicate (labour) data.

Issue #210 – Non network assets volume

Issue raised by Power and Water: Using the CAM is a more accurate reflection of this metric. Also, this category offers little value as “number of devices” is vague and doesn't tell the whole story (a person can have a mobile phone, a laptop, and potentially a tablet but this could be warranted given their role, as well as the current pandemic. Comparing the number of devices this year to, say, 3 years ago, doesn't really add any value to a consumer). Reporting this data is also time consuming as it's an overly manual process (21hrs to complete). Recommend removing requirement to report.

Motor vehicle fleet data seems reasonable.

AER response: AER will review the data requirement for PWC.

Workshop discussion

AusNet Services would also like AER to clarify its use case for this data.

AER teams are now saying they intend to use this information. However, if NSPs have issues with this data requirement, please continue to bring these to our attention as we move through the next round of consultation.

AER to further refine our use case for this data.

ACTION ITEM 3: AER to review our use case for CA2.6.2 – Annual Descriptor Metrics – IT & Communications Expenditure.

Issue #235 – Standard Control Services - Non-network

Issue raised by Power and Water: Reasonable, in line with current RINs requirements; we would have to figure out the "Direct" and "Indirect" split, if applicable, as the current RIN only asks for one total.

Workshop discussion

Only the green cells in the data requirement workbooks show where data is required. Where a cell is left white, the data is not required but the headings are shown for completeness.

Issue #164/208 – Motor Vehicles

Issue raised by Power and Water: The current system in place to record kilometres travelled data is technologically outdated, inaccurate and time consuming to input as it's a manual process. Also, the SCS proportion of the allocation is subjective. Recommend remove requirement.

AER response: AER will review the data requirement for PWC and noted the current RESET RINs under development do not require the forecast data on KMs travelled.

Workshop discussion

ACTION ITEM 4: The AER will refine our use case for kilometres travelled then update the data requirements accordingly.

Formatting issue – #67

There was no further discussion on this issue.

PWC specific issues – #255, #256, #257, #271

There was no further discussion on these issues.

Data use cases

There was no further discussion on Non-Network data use cases.

Topic 5. Vegetation

Formatting issue – #122

There was no further discussion on this issue.

PWC specific issues – #165, #166, #232

There was no further discussion on these issues.

Data use cases

The AER's investigation into the links between the Category Analysis RIN and the Economic Benchmarking RIN is ongoing to remove data duplication.

Topic 6. Maintenance

Issue #168 – Descriptor metrics for routine and non-routine maintenance

Issue raised by Power and Water: Asset quantity inspected/maintained: Relies on estimates of assets that are inspected based on work orders and the data may not be very robust and therefore not useful.

AER response: Noted.

Workshop discussion

This data is currently used by the AER for reset analysis and performance reporting (network safety).

The AER is reviewing the maintenance activity table (CA2.8.1) against the asset age data table (CA5.2.1) to look for duplication and determine a better way to request this data to meet our safety information data requirements.

Issue #120 – Average Asset Age

Issue raised by AusNet Services: We see further opportunities to reduce the volume of data requested, ensuring there is a direct linkage between the information requested and current decision-making. Below we have suggested some specific areas for removal. However, before any data is removed, we would be keen for the AER to consider its potential usefulness for benchmarking as part of a benchmarking review. We would also welcome the opportunity to discuss other opportunities to further streamline information requested: In Consultation Workbook Distribution & Transmission 03 Network Metrics, data requested in Average Age of Asset Group under "Age" can be derived using data provided in Asset Age Profile under "Network Assets – Volumes". This information does not need to be separately provided.

AER response: AER is investigating potential data duplication across CA2.8.1 and CA2.2.1.

Issue #158 – Average age of assets

Issue raised by Ausgrid: Optimising for the AER's established expenditure assessment methods would remove unnecessary data collection requirements, saving costs and promoting greater accessibility for customers. The table below outlines examples of data that could be removed or reduced: Average age of assets - (Category Analysis RIN template 2.8.1). Data collected in Category Analysis RIN 2.8.1 on average age of assets can be calculated using template 5.2.1 of the same RIN.

AER response: AER is investigating potential data duplication across CA2.8.1 and CA2.2.1.

Workshop discussion

The AER needs to understand the linkage between tables CA2.8.1 and CA5.2.1. The AER requests data from the DNSPs to show how these tables link – either via a workbook or a demonstration.

AusNet Services notes CA table 2.8.1 is an onerous template to complete.

ACTION ITEM 5: DNSPs to provide the AER information to show the linkage between tables CA2.8.1 and CA5.2.1

Formatting issues – #53, #78, #114

There was no further discussion on these issues.

PWC specific issues – #169, #207, #212, #233

There was no further discussion on these issues.

Data use cases

There was no further discussion on Maintenance data use cases.

Topic 7. Emergency Response

PWC specific issues – #170, #234

There was no further discussion on these issues.

Data use cases

There was no further discussion on Emergency Response data use cases.

Topic 8. Overheads

Issue #21 – Overheads

Issue raised by Essential: Note indicates that negotiated services and unregulated services are excluded. Suggest that this information will be required somewhere in order to ensure that the total overheads are reported/balanced to.

AER response: The AER will review the overheads data requirements, to ensure any required reconciliation can be made.

Issue #68 – Overheads

Issue raised by Jemena: The current RIN does not disaggregate capitalised network overheads into both capex/opex and SCS/ACS splits. We currently cannot provide the CA RIN 2.11.1 data as requested in this new format. Significant internal IT system changes would be required to facilitate this new data reporting requirement. However, we can provide the CA RIN 2.12.1 data as requested in this new format.

AER response: Where expenditure data is not required to be split into opex and capex, the AER will incorporate it into workbook 9 - Revenue and financial information, and remove it from workbooks 6 and 7.

Issue #72 – Overheads

Issue raised by Jemena: The current RIN does not disaggregate capitalised network overheads into both capex/opex and SCS/ACS splits. We currently cannot provide the CA RIN 2.11.1 data as requested in this new format. Significant internal IT system changes would be required to facilitate this new data reporting requirement. However, we can provide the CA RIN 2.12.1 data as requested in this new format.

AER response: Where expenditure data is not required to be split into opex and capex, the AER will incorporate it into workbook 9 - Revenue and financial information, and remove it from workbooks 6 and 7.

Workshop discussion

The AER noted Overheads data is currently collected in CA tables 2.11, 2.12 and 2.1 (summary table) and AR RIN table 2.10 (which mirror and replaced CA RIN table 2.10A).

CA RIN tables 2.11 and 2.12 do not need to be disaggregated into opex and capex – we disaggregated these tables as we did not have a total expenditure workbook but we will now incorporate these total expenditure data requirements into Workbook 9 Revenue and Financial Statements.

Data use cases

There was no further discussion on Overheads data use cases.

Topic 9. Labour

Issue #5 – Labour/non labour

Issue raised by Essential: The current collection of this data is extremely burdensome and subjective in terms of categories – We would appreciate more detail on how this information will be used by the AER.

AER response: AER is reviewing data use case and requirements.

Issue #119 – Removal of disaggregated labour data

Issue raised by AusNet Services: We see further opportunities to reduce the volume of data requested, ensuring there is a direct linkage between the information requested and current decision-making. Below we have suggested some specific areas for removal. However, before any data is removed, we would be keen for the AER to consider its potential usefulness for benchmarking as part of a benchmarking review. We would also welcome the opportunity to discuss other opportunities to further streamline information requested. We request removal of disaggregated labour data (Average Staffing Level: Numbers by role type and Labour Costs by role type) included in Consultation Workbook Distribution & Transmission 03 Network Metrics, Consultation Workbook Distribution & Transmission 10

Prices, Consultation Workbook Distribution & Transmission 07 Capital Expenditure and Consultation Workbook Distribution & Transmission 06 Operating Expenditure for the following reasons:

- Staffing levels are directly impacted by each network service provider's (NSPs) operating model, including the level of outsourced services, the use of field delivery partners and the organisational/group ownership structure. Therefore, this information is not comparable between businesses. The data also tends to be inconsistent over longer time horizons as businesses change and evolve.
- There is a high level of estimation required to prepare the data. This impacts the reliability and usefulness of the information reported. Previous evaluations have shown that it is cost-prohibitive to make the IT system changes required to directly capture this data and therefore estimation approaches will continue into the future.
- We are not aware of how/where this information is used for decision-making or analysis.

AER response: AER is reviewing data use case and requirements. Where expenditure data is not required to be split into opex and capex, the AER will incorporate it into workbook 9 - Revenue and financial information, and remove it from workbooks 6 and 7.

Issue #155 – Pay rates for employees

Issue raised by Ausgrid: Optimising for the AER's established expenditure assessment methods would remove unnecessary data collection requirements, saving costs and promoting greater accessibility for customers. The table below outlines examples of data that could be removed or reduced.

- Pay rates for employees - (Category Analysis RIN template 2.11.2)

Detailed 'bottom up' information on pay rates is an input which does not currently feed into the AER's 'base step, trend' approach to assessing opex.

AER response: AER is reviewing data use case and requirements.

Issue #171 – Labour

Issue raised by Power and Water: These tables involve a large degree of allocation and mapping where mistakes can be made as the data is sourced from a NT Government system, not a PWC system.

The process to extract the data is simple but it is not an easy process to put each employee into a RIN category and therefore extensive mapping and allocation is needed. This is done in overly large excel workbooks and requires a lot of time to produce.

Removing some sections of tables 2.11.1 and 2.11.2 which are related to stand-down of employees and average productive work hours are not used often and resources could be better deployed to populate other more important RIN cells.

AER response: AER is reviewing data use case and requirements.

Issue #237 – Standard Control Services - Labour

Issue raised by Power and Water: These tables involve a large degree of allocation and mapping where mistakes can be made as the data is sourced from a NT Government system, not a PWC system.

The process to extract the data is simple but it is not an easy process to put each employee into a RIN category and therefore extensive mapping and allocation is needed. This is done in overly large excel workbooks and requires a lot of time to produce.

Recommend removing requirement.

AER response: AER is reviewing data use case and requirements.

Issue #258 – Standard Control Services - Capitalised overheads

Issue raised by Power and Water: These tables involve a large degree of allocation and mapping where mistakes can be made as the data is sourced from a NT Government system, not a PWC system.

The process to extract the data is simple but it is not an easy process to put each employee into a RIN category and therefore extensive mapping and allocation is needed. This is done in overly large excel workbooks and requires a lot of time to produce.

This reporting requirement will involve undoing automated capture of overheads in capex projects. This process usually involves initial allocation of costs at cost centre level not at employee level. This means DNSPs will need to change allocation processes to bring them down to employee level

Recommend removing this reporting requirement.

AER response: Where expenditure data is not required to be split into opex and capex, the AER will incorporate it into workbook 9 - Revenue and financial information, and remove it from workbooks 6 and 7.

Issue #259 – Standard Control Services - Labour/Non-labour expenditure split

Issue raised by Power and Water: These tables involve a large degree of allocation and mapping where mistakes can be made as the data is sourced from a NT Government system, not a PWC system.

The process to extract the data is simple but it is not an easy process to put each employee into a RIN category and therefore extensive mapping and allocation is needed. This is done in overly large excel workbooks and requires a lot of time to produce

Recommend removing this reporting requirement.

AER response: AER is reviewing data use case and requirements.

Issue #264 – Alternative Control Services - Capitalised overheads

Issue raised by Power and Water: This information is difficult to obtain and adds little value.

Recommend removing this reporting requirement.

Reasonable, in line with current RIN CA2.12.1 - we currently get this data out of the OPEX mapping model so can adjust as required. However, don't know how easy it would be to get the split between Smart Meters and Legacy Meters - part of a general, over-arching question for the Metering Strategy Team (do we have capability to get volume and expense metering data, split into the Smart Meters and Legacy Meters category?).

Also note, special meter reading, remote meter reconfiguration, scheduled meter reading, meter investigation, meter testing, meter maintenance, remote meter reading not capital expenditure.

AER response: Noted. NULL response is valid where requirements are not relevant to PWC. Estimated data can be provided.

Issue #285 – Labour

Issue raised by Power and Water: These tables involve a large degree of allocation and mapping where mistakes can be made as the data is sourced from a NT Government system, not a PWC system.

The process to extract the data is simple but it is not an easy process and extensive mapping and allocation is needed. This is done in overly large excel workbooks and requires a lot of time to produce.

Recommend removing requirement for corporate overheads (overtime only) network overheads and total direct network labour.

AER response: AER is reviewing data use case and requirements.

Issue #89/90 – Labour

Issue raised by Citi Power / Powercor / United Energy: Labour for opex and capex: We are unable to provide the labour expenditure required for each opex and capex separately, to split it by the type of employee, for only SCS, would be an extremely significant estimate. Furthermore, the section for network labour (electrical worker etc.) does not specify whether it is for internal labour or external (the current RIN only asks for internal labour so we don't provide it). If it is for external labour, it is not pragmatic to provide the data. Clarity and use case for this data would assist.

AER response: Where expenditure data is not required to be split into opex and capex, the AER will incorporate it into workbook 9 - Revenue and financial information and remove it from workbooks 6 and 7.

The labour data requested reflects current CA RIN - internal labour only.

Workshop discussion

The AER advised the labour data is all currently under review and it is likely that not all of the labour data will be required. This will be reflected in our next iteration of data requirement workbooks.

ACTION ITEM 6: AER to review data requirements for Labour data before the next round of external consultation.

Formatting issues – #55, #69

There was no further discussion on these issues

Data use cases

The AER noted that as the data use cases for Overheads, Labour and Input Tables are not as strong as the businesses might expect, this has triggered an internal review of these data requirements.

Jemena queried if the Labour data use case under review is the use case for the currently reported Labour data or a use case for the proposed opex capex split of Labour data in the new workbooks.

AER response: We no longer propose to split Labour data into opex and capex. The proposed use case review is for Labour data currently reported in the CA RIN.

AusNet Services reiterated its support for the removal of Labour data requirements. This is an onerous template to complete and audit particularly where people are employed under different entities.

Topic 10. Input Tables

Issue #111 – Total expenditure (Capex and Opex)

Issue raised by SAPN: We have also noticed there is an increase in the data reporting requirements within the new data model, with a greater level of granularity of data proposed to be reported in some cases. SA Power Networks has identified the following instances where additional data reporting obligations are proposed: Total expenditure (totex) by type is reported in the Category Analysis RIN – Table 2.12 Input Tables. In the new data model, this data is proposed be reported separately in the operating expenditure and capital expenditure templates, rather than reported at a totex level.

We encourage the AER to conduct a detailed review of the proposed data model templates, in particular reviewing the additional data requested to confirm that the proposed level of data reporting is actually required to support performance reporting or to inform regulatory decision making.

AER response: Where expenditure data is not required to be split into opex and capex, the AER will incorporate it into workbook 9 - Revenue and financial information, and remove it from workbooks 6 and 7.

Formatting issues – #54, #71, #239

There was no further discussion on these issues.

Data use cases

As the AER's current use case for this data is partial, we will do an internal review on this use case prior to the next round of external consultation.

ACTION ITEM 7: AER to refine data use case for Input Tables data before the next round of external consultation.

Topic 11. Alternative Control Services

Issue #32 – Public Lighting Opex

Issue raised by Jemena: CA RIN 4.1.3 reports average unit costs for a range of DNSP-specified categories for light installations, light replacements and light maintenance and does not break this data into the major and minor road and routine and non-routine categories specified. We can provide this data in the new format requested.

AER response: Noted. AER will review the data requirement.

Workshop discussion

The new workbook requirements don't align with the existing RIN. The AER will consider use case against the reporting burden for NSPs.

ACTION ITEM 8: AER will review the data requirements and provide Jemena with further clarification on Light Installation, Light Replacements and Light Maintenance data requirements.

Issue #56 – Public lighting

Issue raised by Jemena: This worksheet includes columns for energy-efficient and non-energy-efficient public lights (columns J and K, respectively), but no data is requested in these columns. The same issue occurs in columns M and N for smart and legacy meters, respectively. Therefore, we recommend that these columns are removed.

AER response: The columns headings are standardised, and allow for detailed disaggregations where needed. NULL values are acceptable, and data can be provided as a 'total.'

Workshop discussion

The NSPs data submission should reflect the data they have available, and they may provide the disaggregated data or a total value, depending on the relevance of the disaggregated information to their business.

Issue #126 – Operating expenses under Alternative Control Services

Issue raised by AusNet Services: Consultation Workbook Distribution 07 Capital Expenditure includes the following Operating Expenses under "ACS"

- Public Lighting Activities: Minor Road Light Maintenance and Major Road Light Maintenance

- Metering Activities: Meter Testing, Meter Investigation, Scheduled Meter Reading, Special Meter Reading, Meter Maintenance, Remote Meter Reading, Remote Meter Reconfiguration and Other
- Fee Based Services (which is a combination of Capital expenditure and Operating expenditure)
- Quoted Services.

We request these tables be included in Consultation Workbook Distribution 06 Operating Expenditure.

AER response: Agree. Public Lighting Activities and Metering Activities will be moved from workbook 07 Capital Expenditure to workbook 06: Operating Expenditure. Fee-based Services and Quoted Services will be copied to workbook 06 as there may be both capital and operating expenditure components to these.

Issue #138 – Public lighting

Issue raised by Energy Queensland: Other outputs, Public lighting activities: The units have changed. Where previously we reported volumes of items like "Major road light installation" now the unit of measure is "Number of activities undertaken". The definition in this workbook does not provide sufficient guidance on the definition of what is required to be reported in line with this change. Further, the definitions appear to reference costs as a unit measure which is not relevant to this non-financial template.

AER response: The AER is not intending to change existing definitions or methodologies. We will review column headings and provide definitions.

Financial data requirements are included in the opex and capex workbooks.

Workshop discussion

ACTION ITEM 9: The AER will correct the units for data requirement 'Other outputs, Public Lighting Activities'.

Issue #204 – Other outputs - Metering

Issue raised by Power and Water: PWC does not have Meter Type 5. Type 2 & 3 should be put back into the reporting to ensure correct apportionment of volumes and dollars to all metering types.

AER response: AER will review relevant tables to ensure we capture Meter Types 1-4, while maintaining standardised headings and row descriptors.

Workshop discussion

NULL response will be valid.

ACTION ITEM 10: AER will amend Metering descriptors to allow smart meters to be included.

Issue #242 – Alternative Control Services - metering

Issue raised by Power and Water: PWC does not have Meter Type 5. Type 2 & 3 should be put back into the reporting to ensure correct apportionment of volumes and dollars to all metering types.

New meter installation, meter replacement, meter purchase are not operational expenditure items.

AER response: NULL response is valid.

Workshop discussion

ACTION ITEM 11: AER will review the Metering data requirements to make sure we are capturing the data in the correct workbook categories in the next iteration of data requirement workbooks.

Formatting issues – #60, #64, #73 and #127

There was no further discussion on these issues.

PWC specific issues – #172, #173, #205, #241, #243, #266

There was no further discussion on these issues.

Data use cases

There was no further discussion on Alternative Control Services data use cases.

Topic 12. Demand

Formatting issues – #2, #22

There was no further discussion on these issues.

Data use cases

There was no further discussion on Demand data use cases.

Topic 13. New Data

Issue #1 – Activities

Issue raised by Essential: There are no limitations or context provided in the definitions.

In NSW we currently report major events to IPART (>5k customers impacted for >4hrs).

The description is very broad. Potential duplication with IPART. Likely to require significant resources and system change to collate the activity information.

We would appreciate more detail on how this information will be used by the AER.

AER response: This data was included as a placeholder, and continued development of the data requirements will take place outside of the development of the new regulatory instruments.

Workshop discussion

Where detailed consultation and analysis needs to be undertaken, we will not include a new data requirement under the new instrument but instead collect the required information via a more informal information request. When the requirements are refined, they will then be incorporated into the formal instrument at the next cycle.

Data use cases

Powercor notes AER's safety activity data requirements could overlap with individual state-based regulated data requirements. Will the AER liaise with the state-based regulators to avoid duplication?

AER response: We are aware of these regulations and the reporting that is required. However, where there are different standards between jurisdictions, we will be looking to standardise.

Topic 14

[Issues under Topic 14. Public Lighting have been included under Topic11. Alternative Control Services].

Topic 15. Other

Issue #93 – Immediate expensing capex

Issue raised by CitiPower / Powercor / United Energy: Capex by asset class – immediate expensing of capex: There is a significant lag in our tax returns so the information in the workbook is not available. We would have to report information relating to the prior year or provide an estimate. We currently don't provide any data on this for to these reasons.

AER response: It is the AER's expectation that a business will submit to the ATO the amount of capex they intend to immediately expense for tax reporting purposes for the relevant period. We would therefore expect the business to provide an estimate reflecting what is expected to be reported to the ATO. Material differences will have to be updated when reports to the ATO are finalised.

Workshop discussion

AER requires this data even if it is an estimate. This data is used annually by our modelling team.

Formatting issues – #52, #58, #61, #70, #87, #230

There was no further discussion on these issues.

PWC specific issue – #228, #231, #249, #250, #260, #262, #263, #265

There was no further discussion on these issues.

Other issues

AusNet Services noted that businesses treat expenditure balancing items differently and this creates issues especially in the non-networks tables.

The AER stated part of the reason why the AER is requesting to collect direct and indirect expenditure discretely is so we can find out what is driving these balancing items and perhaps eliminate them. However, the AER needs a better understanding from the businesses as to what is being included in these balancing items so we can do this.

AusNet Services notes the maintenance template requires the same information in two rows which, by definition, creates the need for an offsetting balancing item.

AusNet Services notes that non-network IT can be seen as both an Overhead and as IT expenditure which also creates the need for a balancing item.

The AER noted in is introducing links between disaggregated and summary data to minimise duplicate reporting and help minimise the need for any balancing items to be reported. The AER aims to collect disaggregated data that should be mutually exclusive and collectively exhaustive to eliminate the need for balancing items. If this is not possible, we need to understand from the businesses what is driving their balancing items.

<p>ACTION ITEM 12: AER will work with the NSPs to determine what is being included in the expenditure balancing item lines.</p>
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