

# Pricing Proposal Statement of compliance

Prices effective 1 July 2024

16/05/24



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# 1. Introduction

This statement of compliance as well as the standardised SCS and ACS pricing models form Endeavour Energy's pricing proposal for 2024-25. This is an initial pricing proposal that has been submitted within 15 business days after publication of the distribution determination.

Below is a full list of documents that form part of this proposal:

- 2024-25 Pricing proposal overview - this document is not reviewed by the AER.
- 2024-25 Statement of compliance (this document) – public and confidential
- 2024-25 SCS pricing model – public and confidential
- 2024-25 ACS pricing model – public
- Supporting information – public and confidential

## 2. Demand Forecasts

Endeavour Energy has provided quantity forecasts for standard control services in the 'Qty forecasts' sheet of the SCS pricing model.

### Energy Consumption

In comparison to the previous pricing proposal's forecast, the consumption volumes for the current regulatory year are on trend for our residential customer class but are materially above trend for non-residential customer classes due to the imminent connection of multiple large spot-loads in Western Sydney and the residual impact of COVID shut-downs depressing the historic trend.

Our energy forecasts are made using a weather-normalised, trend-based approach that incorporates price and NSW-based income elasticities. Our methodology also incorporates expected step-changes in energy resulting from large customer connections.

	Annual %Trend Actuals Only FY19 to FY23	Annual %Trend Inclusive of Forecasts FY19 to FY25
Residential	0.0%	-0.1%
Small Business	-4.1%	-1.6%
<b>Total</b>	<b>0.3%</b>	<b>1.2%</b>

### Customer Numbers

In comparison to the previous pricing proposal's forecast, the customer numbers for the current regulatory year are on trend for residential and non-residential customer classes.

Our customer forecasts are made on a trend base approach.

	Annual %Trend Actuals Only FY19 to FY23	Annual %Trend Inclusive of Forecasts FY19 to FY25
Residential	2.1%	2.1%
Small Business	1.3%	1.1%
<b>Total</b>	<b>1.7%</b>	<b>1.7%</b>

## 3. Tariffs

### 3.1 Standard control services

The 'Tariff schedule' sheet of the SCS pricing model sets out the proposed 2024-25 prices for standard control services.

All tariffs remain in the same tariff class as the current tariff structure statement<sup>1</sup>. This is demonstrated in tariff schedule 2 of the SCS pricing model.

All tariffs retain the same charging parameters as the current tariff structure statement<sup>2</sup>. This is also demonstrated in tariff schedule 2 of the SCS pricing model. Below is a summary of each charging parameter:

#### 3.1.1 Small low voltage tariff class

The charging parameters for the proposed tariffs for our low voltage customers in this tariff class are set out in the table below.

Table 3.1: Charging parameters for the small low voltage tariff class

Tariff type	Components	Units	Charging parameter
<b>Residential Anytime Energy</b>	Fixed	c/day	Daily access charge
	Energy	c/kWh	Charge applied to all energy consumption
<b>General Supply Anytime Block Energy</b>	Fixed	c/day	Daily access charge
	1 <sup>st</sup> Block Energy	c/kWh	Charge applied to energy consumption up to and including 120MWh per annum <sup>3</sup>
	2 <sup>nd</sup> Block Energy	c/kWh	Charge applied to energy consumption above 120MWh per annum
<b>Residential &amp; General Supply Seasonal TOU Energy tariffs</b>	Fixed	c/day	Daily access charge
	High-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.

<sup>1</sup> Endeavour Energy Tariff Structure Statement 2024-29, Table 2, page 7

<sup>2</sup> Endeavour Energy Tariff Structure Statement 2024-29, Section 4.2, pp 21 to 28

<sup>3</sup> Endeavour Energy has displayed block tariff consumption thresholds on a MWh per annum basis. In practice, this annualized consumption threshold will be calculated on a pro-rata basis corresponding to the billing period.

Tariff type	Components	Units	Charging parameter
	Solar soak energy	c/kWh	Charge applied to energy consumed between 10:00 to 14:00 on all days.
	Off-peak energy	c/kWh	Charge applied to energy consumed at all other times
<b>Residential &amp; General Supply Seasonal TOU Demand tariffs</b>	Fixed	c/day	Daily access charge
	Solar soak energy	c/kWh	Charge applied to energy consumed between 10:00 to 14:00 on all days.
	Energy	c/kWh	Charge applied to energy consumed at all other times
	High-season peak demand	c/kW/day	Charge applied to maximum energy demand between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season peak demand	c/kW/day	Charge applied to maximum energy demand between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
<b>Prosumer (import / export)</b>	Export charge	c/kWh	Charge applied to maximum energy export between 10:00 to 14:00 on all days. Applies to energy export greater than 2,920 kWh per annum <sup>4</sup> .
	High-season energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
<b>Low voltage grid connected storage (Import)</b>	Fixed	c/day	Daily access charge
	High-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days.

<sup>4</sup> Endeavour Energy has displayed basic export level threshold on a kWh per annum basis. In practice, this annualized consumption threshold will be calculated on a daily basis and applied to the billing period.

Tariff type	Components	Units	Charging parameter
			High-season includes the months November to March inclusive.
	Low-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
	Solar soak energy	c/kWh	Charge applied to energy consumed between 10:00 to 14:00 on all days.
	Off-peak energy	c/kWh	Charge applied to energy consumed at all other times
<b>Low voltage grid connected storage (Export)</b>	High-season peak energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season peak energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
	Export charge	c/kWh	Charge applied to maximum energy export between 10:00 to 14:00 on all days. Applies to energy export greater than 2,920 kWh per annum <sup>5</sup> .
	Off-peak energy	c/kWh	Reward applied to energy exported at all other times
<b>Controlled Load 1</b>	Fixed	c/day	Daily access charge
	Energy	c/kWh	Charge applied to controlled energy consumption where energy consumption is controlled by our equipment so that supply may not be available between 07:00 and 22:00.
<b>Controlled Load 2</b>	Fixed	c/day	Daily access charge
	Energy	c/kWh	Charge applied to controlled energy consumption where supply is available for restricted periods not exceeding a total of 17 hours in any period of 24 hours.

<sup>5</sup> Endeavour Energy has displayed basic export level threshold on a kWh per annum basis. In practice, this annualized consumption threshold will be calculated on a daily basis and applied to the billing period.

### 3.1.2 Large low voltage tariff class

The charging parameters for the proposed tariff structures for our large low voltage customers are set out in the table below:

Table 3.2: Charging parameters for the large low voltage tariff class

Tariff type	Components	Units	Charging parameter
<b>Seasonal TOU Demand</b>	Fixed	c/day	Daily access charge.
	High-season Peak Energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season Peak Energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
	Off Peak Energy	c/kWh	Charge applied to all energy consumed at all other times.
	High-season Demand	c/kVA/day	Charge applied to maximum energy demand between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season Demand	c/kVA/day	Charge applied to maximum energy demand between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
<b>Transitional Seasonal TOU Energy</b>	Fixed	c/day	Daily access charge.
	High-season Peak Energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season Peak Energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
	Off Peak Energy	c/kWh	Charge applied to energy consumed at all other times.



Tariff type	Components	Units	Charging parameter
<b>Embedded network tariff<sup>6</sup></b>	As per the Seasonal TOU Demand tariff.		
<b>Site-specific LV Demand</b>	As per the Seasonal TOU Demand tariff.		

### 3.1.3 High voltage demand tariff class

The charging parameters for the proposed tariff structures for our high voltage customers are set out in the table below:

Table 3.3: Charging parameters for the high voltage demand tariff class

Tariff type	Components	Units	Charging parameter
<b>Seasonal TOU Demand</b>	Fixed	c/day	Daily access charge.
	High-season Peak Energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season Peak Energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
	Off Peak Energy	c/kWh	Charge applied to all energy consumed at all other times.
	High-season Demand	c/kVA/day	Charge applied to maximum energy demand between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season Demand	c/kVA/day	Charge applied to maximum energy demand between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.

<sup>6</sup> The embedded network tariff will be transitioned to the full embedded network tariff over a three-year period. Customers will be assigned to the transitional embedded network tariff during the three-year transition period.

Tariff type	Components	Units	Charging parameter
<b>Site-specific HV Demand</b>	As per the Seasonal TOU Demand tariff.		
<b>Site-specific HV Grid Storage</b>	Fixed	c/day	Daily access charge.
	High-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
	Off-peak energy	c/kWh	Charge applied to energy consumed at all other times
	High-season peak energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season peak energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
	Off-peak energy	c/kWh	Reward applied to energy exported at all other times.

### 3.1.4 Subtransmission demand tariff class

The charging parameters for the proposed tariff structures for our subtransmission voltage customers are set out in the table below:

Table 3.4: Charging parameters for the subtransmission demand tariff class

Tariff type	Components	Units	Charging parameter
<b>Seasonal TOU Demand</b>	Fixed	c/day	Daily access charge.
	High-season Peak Energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season Peak Energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.

Tariff type	Components	Units	Charging parameter
	Off Peak Energy	c/kWh	Charge applied to all energy consumed at all other times.
	High-season Demand	c/kVA/day	Charge applied to maximum energy demand between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season Demand	c/kVA/day	Charge applied to maximum energy demand between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
<b>Site-specific ST Demand</b>	As per the Seasonal TOU Demand tariff.		
<b>Site-specific ST Grid Storage</b>	Fixed	c/day	Daily access charge.
	High-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season peak energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
	Off-peak energy	c/kWh	Charge applied to energy consumed at all other times
	High-season peak energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season peak energy export	c/kWh	Reward applied to energy exported between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
	Off-peak energy	c/kWh	Reward applied to energy exported at all other times

### 3.1.5 Inter-distributor transfer demand tariff class

The charging parameters for the proposed tariff structures for our inter-distributor tariff (IDT) customers are set out in the table below:

Table 3.5: Charging parameters for the inter-distributor transfer demand tariff class

Tariff type	Components	Units	Charging parameter
IDT	Fixed	c/day	Daily access charge.
	High-season Peak Energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season Peak Energy	c/kWh	Charge applied to energy consumed between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.
	Off Peak Energy	c/kWh	Charge applied to all energy consumed at all other times.
	High-season Demand	c/kW/day	Charge applied to maximum energy demand between 16:00 to 20:00 on business days. High-season includes the months November to March inclusive.
	Low-season Demand	c/kW/day	Charge applied to maximum energy demand between 16:00 to 20:00 on business days. Low-season includes the months April to October inclusive.

### 3.1.6 Unmetered supply tariff class

The charging parameters for the proposed tariff structures for our inter-distributor tariff customers are set out in the table below:

Table 3.6: Charging parameters for the unmetered supply tariff class

Tariff type	Components	Units	Charging parameter
Unmetered energy tariff	Energy	c/kWh	Charge applied to all energy consumption.

The expected weighted average revenue for each tariff class for the current and forecast years is demonstrated in output table 5 of the SCS pricing model.

### 3.2 Alternative control services

The ACS pricing model sets out the proposed 2024-25 prices for alternative control services.

Endeavour Energy will offer the same list of services for public lighting and ancillary network services as approved in the AER's final determination for alternative control services<sup>7</sup>. The list of services for public lighting and fee-based services is provided in the ACS pricing model. Quoted services are provided in line with the approved control mechanism formula<sup>8</sup> using the applicable labour rates in the ACS pricing model.

### 3.3 Tariff variations

We are not anticipating variations or adjustments to our tariff prices, tariff class or charging parameters within the FY25 period.

### 3.4 Sub-threshold tariffs

Endeavour Energy is proposing one sub-threshold tariffs for the regulatory year:

- Off Peak+, introduced in 2022-23

Endeavour Energy has notified the AER on this sub-threshold tariff no later than four months before the start of a regulatory year. This notification is available on the [AER website](#).

The Off Peak+ sub-threshold tariff has a forecast revenue that is less than 1 per cent of total allowable revenue, and all sub-threshold tariffs have a combined forecast revenue less than 5 per cent of total allowable revenue. This is demonstrated in compliance table 4 of the SCS pricing model.

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<sup>7</sup> AER Final Decision 2024-29 – Attachment 16 Alternate Control Services – Endeavour Energy, Tables A.2, A.3 and A.4

<sup>8</sup> AER Final Decision 2024-29 – Attachment 14 Control Mechanisms – Endeavour Energy, Figure 14-7

## 4. Pricing Principles

The revenue expected to be recovered from each tariff class lies on or between an upper bound representing the standalone cost of serving the retail customers who belong to that class and a lower bound representing the avoidable cost of not serving those retail customers. This is demonstrated in compliance table 5 of the SCS pricing model. Endeavour Energy calculates stand-alone and avoidable costs by first classifying each of our network cost categories based on the following two dimensions:

- whether costs are direct or indirect; and
- whether costs are scalable or non-scalable.

Avoidable cost for each tariff class is calculated as the sum of all direct costs multiplied by a weight based on asset value, which represents the proportion of direct costs that are attributable to that tariff class.

Stand-alone cost for each tariff class is calculated by taking the avoidable cost for that tariff class and adding to it:

- all non-scalable indirect costs we incur in operating the network; and
- a proportion of our scalable, indirect costs that can be attributed to that tariff class.

The sum of the revenue expected to be recovered from each tariff allows Endeavour Energy to recover the expected revenue for the relevant services in accordance with the distribution. This is demonstrated in compliance table 1 of the SCS pricing model.

Each tariff is based on the long-run marginal cost of providing the service to which it relates to the retail customers assigned to that tariff.

The long-run marginal cost estimates are unchanged from the current tariff structure statement<sup>9</sup>.

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<sup>9</sup> Endeavour Energy Tariff Structure Statement 2024-29, Table 3, page 14

## 5. Indicative Prices

Revised indicative prices for standard control services tariffs are provided in input table 29 and 30 of the SCS pricing model. Revised indicative price caps for alternative control services are provided in the ACS pricing model. These indicative price levels have been determined in accordance with the current tariff structure statement and updated to account for this pricing proposal.

The proposed tariff prices are materially different to the corresponding indicative prices and this is demonstrated in compliance table 6 and 7 of the SCS pricing model. Brief notes have been written in column AC of the 'Price comp. ind.' sheet explaining the reasons for the difference. Furthermore, we explain below in greater detail the source(s) for the material differences between the proposed tariff prices and their corresponding indicative prices.

Endeavour Energy's 2024-29 Revised Regulatory Proposal was accompanied by an Indicative Pricing Schedule (IPS) of 2024-25 tariffs. The following table demonstrates the underlying difference between the average price movement assumed in the IPS and the actual 2024-25 average pricing outcomes.

Table 5.1 – Actual vs estimated average network price change

Weighted average network tariff change	Estimate IPS 2024-25	Actual 2024-25
Distribution tariffs (% Real)	10.9%	4.3%
Metering (% Real)	0.0%	-12.6%
Designated Pricing Proposal Charges (% Real)	11.5%	27.3%
Jurisdictional Scheme Amounts (% Real)	10.3%	35.0%
CPI	4.1%	4.1%
Weighted average network price change (% Nominal)	15.4%	15.3%

Significant differences between forecast and actual outcomes for those NUOS pricing inputs outside of Endeavour Energy's control have occurred, as summarised below:

- DUOS have reduced due to a change in the revenue smoothing profile in the AER's final decision;
- DPPC (Transmission) amounts have increased sharply despite no indication of this change in TransGrid's public regulatory decision documents; and
- JSA amounts have increased significantly.

The different between forecast and the proposed 2024-25 prices primarily reflects the difference in the rate of change in the DUOS, DPPC and JSA tariffs and their differing proportional representation in each NUOS charging parameter.

## 6. Tariff Components

### 6.1 Distribution use of system charges

Tariffs designed to pass on distribution use of system charges are available in the 'Tariff schedule' sheet of the SCS pricing model. The revenue expected to be recovered from these tariffs does not exceed the estimated amount of distributed use of system charges adjusted for over or under recovery. This is demonstrated in output table 6 of the SCS pricing model.

The over or under recovery amount is calculated in a manner consistent with the AER's final decision for control mechanisms<sup>10</sup>.

To ensure RoLR amounts can be recovered accurately via the over/under recovery mechanism, Endeavour Energy's approach to determine under recovered network charge amounts is based off the unpaid network bills that we send to the retailer. The network bills provide a line-by-line record of the charges relating to each customer. Total network use of system charges have been broken down into DUOS, DPPC and JSA charges using the average split of charges in the impacted years.

### 6.2 Designated pricing proposal charges

Tariffs designed to pass on designated pricing proposal charges are available in the 'Tariff schedule' sheet of the SCS pricing model. The revenue expected to be recovered from these tariffs does not exceed the estimated amount of designated pricing proposal charges adjusted for over or under recovery. This is demonstrated in output table 6 of the SCS pricing model.

The over or under recovery amount is calculated in a manner consistent with the AER's final decision for control mechanisms<sup>11</sup> and is compliant with the NER.

Endeavour Energy has used TransGrid's 2024-25 transmission prices and TransGrid's forecast of revenue by transmission pricing component to estimate 2024-25 DPPC amounts.

### 6.3 System strength charges

Endeavour Energy is planning to pass through system strength charges for system strength connection points for the 2024-25 period.

Endeavour Energy will bill system strength users in accordance with amended clause 6.20.3A. Under this clause, Endeavour Energy will bill system strength users connected to our network who are subject to the charge (i.e. have a system strength connection point) on a pass through basis so that the amount, structure and timing of the amount billed by Endeavour Energy replicates as far as is reasonably practicable the amount, structure and timing of the corresponding system strength charge billed to Endeavour Energy by the relevant System Signal Strength Provider.

As at the time of this proposal, Endeavour Energy has not been advised by the System Signal Strength Provider of any system strength users connected to our network for which this pass-through is required.

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<sup>10</sup> AER Final Decision 2024-29 – Attachment 14 Control Mechanisms – Endeavour Energy, Table 14-1

<sup>11</sup> ibid



## 6.4 Jurisdictional scheme amounts

Endeavour Energy's jurisdictional schemes have not been amended since the last jurisdictional scheme approval date.

Tariffs designed to pass on jurisdictional scheme amounts are available in the 'Tariff schedule' sheet of the SCS pricing model. The revenue expected to be recovered from these tariffs does not exceed the estimated amount of jurisdictional scheme amounts adjusted for over or under recovery. This is demonstrated in output table 6 of the SCS pricing model.

The over or under recovery amount is calculated in a manner consistent with the AER's final decision for control mechanisms<sup>12</sup> and is compliant with the NER.

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<sup>12</sup> ibid

## 7. Compliance

### 7.1 Compliance with the determination

We confirm that our tariff assignment policy and the methodology in which we review and assess the basis on which a customer is charged is unchanged from the current TSS and is compliant with the NER<sup>13</sup>.

There are no other material changes that should be brought to the attention of the AER.

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<sup>13</sup> Endeavour Energy Tariff Structure Statement 2024-29, Section 2.2, pp 8 to 9, Chapter 5, pp 30 to 37

## 7.2 Compliance table

Rule reference	Section reference
6.18.2(a)	Chapter 1 - Introduction
6.18.8(a)(3)	Chapter 2 - Demand forecasts
6.18.2(b)(2) 6.18.2(b)(3) 6.18.2(b)(4) 6.18.6 6.18.2(b)(5) 6.18.1C 11.141.8	Chapter 3 - Tariffs
6.18.5(e) 6.18.5(f) 6.18.5(g)(2)	Chapter 4 - Pricing principles
6.18.2(d) 6.18.2(e) 6.18.2(b)(7A)	Chapter 5 - Indicative prices
6.18.2(b)(6) 6.18.2(b)(6A) 6.18.2(b)(6B) 6.18.2(b)(6C) 6.18.7 6.18.7A	Chapter 6 - Tariff components
6.18.3 6.18.4 6.18.2(b)(7) 6.18.2(b)(8)	Chapter 7 - Compliance

I, [REDACTED], *Head of Network Regulation and Investments*, confirm that the above statements are true and correct.

Signature: [REDACTED]

Date: 16 May 2024

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