

evoenergy

2024-25 Pricing proposal statement of compliance

Australian Capital Territory electricity distribution
network

Submission to the Australian Energy Regulator

May 2024

Contents

1. Introduction	3
2. Demand forecasts	3
3. Tariffs	4
3.1. Standard control services	4
3.2. Alternative control services	5
3.3. Tariff variations	5
3.4. Sub-threshold tariffs	5
4. Pricing principles	8
5. Indicative prices	8
6. Tariff components	8
6.1. Distribution use of system charges	9
6.2. Designated pricing proposal charges	9
6.3. System strength charges	10
6.4. Jurisdictional scheme amounts	10
7. Compliance	11
7.1. Compliance with the determination	11
7.2. Compliance Table	11

1. Introduction

This statement of compliance as well as the standardised SCS and ACS pricing models form Evoenergy's pricing proposal for the 2024-25 regulatory year. This is an initial pricing proposal that has been submitted within 15 business days after publication of the Australian Energy Regulator's (AER's) distribution determination for Evoenergy for the regulatory control period from 1 July 2024 to 30 June 2029.

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

- Attachment A – 2024-25 Statement of compliance (this document) – public
- Attachment B – 2024-25 SCS pricing model – public
- Attachment C – 2024-25 SCS pricing model – confidential
- Attachment D – 2024-25 ACS pricing model – public
- Attachment E – 2024-25 Pricing proposal overview – public
- Attachment F – Supporting documentation – confidential
- Attachment G – 2024-25 Schedule of charges - public

2. Demand forecasts

Evoenergy has provided quantity forecasts for standard control services in the 'Qty forecasts' sheet of the SCS pricing model.¹

Evoenergy forecasts the quantity of electricity consumed and the number of electricity customers in the Australian Capital Territory (ACT), as well as other measures of electricity use, using a purpose-built model that combines historical data with econometric techniques and forecasts of independent variables. The forecasts take into consideration a range of factors, including population growth, climate variables, behind-the-meter generation, electric vehicle (EV) uptake, as well as historical trends and changing consumption patterns across the customers on Evoenergy's tariffs. Evoenergy also considers the latest available information about new high voltage (HV) customer connections being planned on the network. Evoenergy describes this methodology in further detail in its Electricity Network 2024-29 regulatory proposal to the Australian Energy Regulator (AER).²

The 2024-25 forecasts were developed using the same methodology that is described in Evoenergy's 2024-29 regulatory proposal. Evoenergy has updated its forecasts for 2024-25 to include the latest available data on electricity usage and connections across Evoenergy's suite of network tariffs, including the latest information on HV customer connections.

Table 1 summarises the 2024-25 forecast and includes the current estimates for 2023-24. The 2024-25 forecast reflects an expected increase in demand, which reflects ongoing substitution from gas to electricity by residential customers, the uptake of EVs and population growth in the ACT.

The current estimates for 2023-24, which is still in progress at the time of this annual pricing proposal, are broadly similar to the forecasts for that year that were included in Evoenergy's 2023-24 pricing proposal (3,015 GWh and 211,596 customers),³ with variances in energy consumption principally driven by milder than expected weather conditions during 2023-24.

¹ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Qty forecasts', 10 May 2024.

² A detailed write-up of the model methodology and results was contained at Appendix L to the January 2023 regulatory proposal, '*Evoenergy-Appendix L Energy and customer number forecasts-January 2023_Public*'.

³ Evoenergy, *Evoenergy - 2023-24 Annual SCS Pricing Model*, worksheet 'Qty', 27 April 2023.

Evoenergy notes that the historical quantities for 2022-23 and earlier, which are presented in the current SCS pricing model,⁴ are obtained by the AER from Evoenergy’s economic benchmarking Regulatory Information Notices (RINs). This data is reported on a different basis to the quantities used to set network prices each year, and therefore is not comparable with the 2023-24 estimates and 2024-25 forecasts that are included in the SCS model. Specifically, Evoenergy’s Economic Benchmarking RINs include ‘inactive’ connections, which are not counted for pricing purposes because these connections do not pay network charges.

Table 1: Evoenergy 2023-24 estimates and 2024-25 forecasts

Customer class	2023-24 estimate	2024-25 forecast
Customer numbers		
Residential	194,806	197,869
Low voltage commercial	17,468	17,597
High voltage commercial	39	41
Total	212,313	215,508
Energy consumption (GWh)		
Residential	1,211	1,255
Low voltage commercial	1,339	1,346
High voltage commercial	412	406
Total	2,962	3,007

Note, customer numbers represent the average for the year. Total customer numbers and energy consumption may not add due to rounding.

3. Tariffs

3.1. Standard control services

The ‘Tariff schedule’ sheet of the SCS pricing model sets out Evoenergy’s proposed network prices for standard control services in the 2024-25 regulatory year.⁵

All tariffs remain in the same tariff class as the 2024-29 tariff structure statement.⁶ This is demonstrated in tariff schedule 3 of the SCS pricing model.⁷

All tariffs retain the same charging parameters as Evoenergy’s 2024-29 tariff structure statement.⁸ This is also demonstrated in tariff schedule 3 of the SCS pricing model.⁹ Evoenergy’s charging parameters are presented in Table 2 on the next page. Evoenergy presents a complete list of tariffs and their charging parameters in the Schedule of Charges contained in Attachment G.

⁴ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet ‘Qty forecasts’, 10 May 2024.

⁵ Evoenergy notes that the AER SCS model reports the critical peak export charge and critical peak export reward (which apply to Evoenergy’s large-scale storage tariffs) in c/kWh. In practice, these are charged in c/kVAh in accordance with Evoenergy’s approved TSS for 2024-29.

⁶ AER, *Evoenergy distribution determination 2024-29 – revised tariff structure statement*, Final decision, April 2024, p 9.

⁷ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet ‘Tariff schedule’, 10 May 2024.

⁸ AER, *Evoenergy distribution determination 2024-29 – revised tariff structure statement*, Final decision, April 2024, pp 28-29.

⁹ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet ‘Tariff schedule’, 10 May 2024.

The expected weighted average revenue for each tariff class for the current and forecast years is presented in output table 5 of the SCS pricing model.¹⁰ The side constraint does not apply during year 1 of the regulatory control period.

3.2. Alternative control services

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

Evoenergy will offer the same list of services for metering and ancillary network services as approved in the AER's final determination for alternative control services.¹¹ The list of services for metering and fee-based services is provided in the ACS pricing model. Quoted services are provided in line with approved control mechanism formula using the applicable labour rates in the ACS pricing model.¹²

3.3. Tariff variations

Evoenergy does not expect to apply any variations or adjustments to its proposed network prices, tariff classes or charging parameters within 2024-25.

Evoenergy's 2024-29 tariff structure statement includes a provision for individually calculated tariffs for customers connecting to Evoenergy's sub-transmission network.¹³ Evoenergy does not currently have any customers on individually calculated tariffs, nor does it expect any connections during 2024-25. Should it become necessary to apply an individually calculated tariff, Evoenergy will include the relevant information in future years' pricing proposals.

3.4. Sub-threshold tariffs

Evoenergy does not propose to apply any sub-threshold tariffs in the 2024-25 regulatory year.

¹⁰ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Tables', 10 May 2024.

¹¹ AER, *Evoenergy electricity distribution determination 2024 to 2029 – Attachment 16: Alternative Control Services*, Final decision, April 2024, pp 9-19.

¹² AER, *Evoenergy Electricity Distribution Determination 2024 to 2029 – Attachment 14: Control mechanisms*, Final decision, April 2024, pp 12-13.

¹³ AER, *Evoenergy distribution determination 2024-29 – revised tariff structure statement*, Final decision, April 2024, pp 26-27.

Table 2: Evoenergy charging parameters for SCS tariffs

Charging parameters	Unit	Explanation <i>all times are in Australian Eastern Standard Time (AEST)</i>
Fixed charge	c/day	A fixed network access charge that applies each day, irrespective of energy usage. Fixed charges apply to all tariffs except for the following tariffs: <ul style="list-style-type: none"> the Off-peak (1) night tariff (060); the Off-peak (3) day and night tariff (070); Small unmetered loads (135); Streetlighting (080); and Large-scale storage technology tariffs (108, 109, 123 and 124).
Anytime energy consumption	c/kWh	Applies to energy consumption on tariffs with a flat consumption charge that does not vary with the time of day.
Block 1 energy consumption	c/kWh	An inclining block energy consumption charge where different rates apply below and above consumption thresholds, applicable to: <ul style="list-style-type: none"> the Residential 5000 network tariff (020); the Residential with heat pump tariff (030); and the General network tariff (040).
Block 2 energy consumption	c/kWh	An inclining block energy consumption charge where different rates apply below and above consumption thresholds (as listed above).
Peak energy consumption	c/kWh	Applies to energy consumption during peak period times, i.e., for: <ul style="list-style-type: none"> the (closed) residential TOU tariff (015), 7am-9am and 5pm-8pm daily; the New residential TOU tariff (017), 7am-9am and 5pm-9pm daily; and LV and HV commercial customers on relevant tariffs, 7am-5pm on weekdays.
Shoulder energy consumption	c/kWh	Applies to energy consumption during shoulder period times, i.e., for: <ul style="list-style-type: none"> the (closed) residential TOU tariff (015), 9am-5pm and 8pm-10pm daily; and LV and HV commercial customers on relevant tariffs, 5pm-10pm on weekdays.
Off-peak energy consumption	c/kWh	Applies to energy consumption during off-peak period times, i.e. for: <ul style="list-style-type: none"> the (closed) residential TOU tariff (015), 10pm-7am daily; the New residential TOU tariff (017), 9pm-7am, 9am-11am and 3pm-5pm daily; the New residential demand tariff (023), 3pm-11am daily; the Off-peak (1) night tariff (060), 10pm-7am; the Off-peak (3) day and night tariff (070), 10pm-7am and 9am-5pm; and

		<ul style="list-style-type: none"> • LV and HV commercial customers on relevant tariffs, 10pm-7am on weekdays and any time on weekends.
Solar soak energy consumption	c/kWh	Applies to energy consumption during solar soak period times between 11am-3pm daily for the new residential TOU tariff (017) and the new residential demand tariff (023).
Net energy consumption	c/kWh	Applies to net energy consumption during anytime for Evoenergy's large-scale storage technology tariffs (108, 109, 123 and 124). Net energy consumption is the difference between the electricity imported and exported by the customer.
Peak maximum demand – residential high season	c/kW/day	A seasonal maximum demand charge based on a customer's highest 30-minute demand within the billing month between 5pm-9pm daily for the new residential demand tariff (023) during high season (winter months).
Peak maximum demand – residential low season	c/kW/day	A seasonal maximum demand charge based on the highest 30-minute demand within the billing month between 5pm-9pm daily for the new residential demand tariff (023) during low season (outside of winter months).
Peak maximum demand (all year)	c/kW/day	Applies based on the highest 30-minute demand within the billing month between: <ul style="list-style-type: none"> • 5pm-8pm daily for the (closed) residential demand tariff (025); and • 7am-5pm on weekdays for LV commercial customers on the LV kW demand network tariff (106).
Peak kVA maximum demand (all year)	c/kVA/day	Applies based on the highest 30-minute demand within the billing month between 7am-5pm on weekdays for LV and HV commercial customers on relevant tariffs.
Off-peak maximum demand	c/kW/day	Applies based on the highest 30-minute demand within the billing month between 9pm-9am daily for the new residential demand tariff (023).
Capacity charge	c/kVA/day	Applies based on the anytime highest 30-minute demand within the past 13 months, including the current billing month, for LV and HV commercial customers on relevant tariffs.
Critical peak export charge	c/kWh	Applies during critical peak periods for Evoenergy's large-scale storage technology tariffs (108, 109, 123 and 124).
Critical peak export rebate	c/kWh	Applies during critical peak periods for Evoenergy's large-scale storage technology tariffs (108, 109, 123 and 124).
Peak maximum demand – commercial high season	c/kVA/day	A seasonal maximum demand charge based on the highest 30-minute demand within the billing month which applies for Evoenergy's large-scale storage technology tariffs during high season (spring and summer) between: <ul style="list-style-type: none"> • 5pm-8pm daily for residential area tariffs (108 and 123); and • 7am-5pm on weekdays for commercial area tariffs (109 and 124).
Peak maximum demand – commercial low season	c/kVA/day	A seasonal maximum demand charge based on the highest 30-minute demand within the billing month which applies for Evoenergy's large-scale storage technology tariffs during low season (winter and autumn) between: <ul style="list-style-type: none"> • 5pm-8pm daily for residential area tariffs (108 and 123); and • 7am-5pm on weekdays for commercial area tariffs (109 and 124).

4. Pricing principles

The revenue that Evoenergy expects to recover from each tariff class lies between an upper bound that is equal to the standalone cost of serving the customers in that class and a lower bound that is equal to the cost that would be avoided by not serving those retail customers (the avoidable cost). This is demonstrated in compliance table 5 of the SCS pricing model.¹⁴

Evoenergy calculates the avoidable cost for each tariff class using its estimate of the long-run marginal cost (LRMC) of providing network services to customers in that tariff class. LRMC is the future network cost that could be avoided by a small change in a customer's use of the network. Its estimation is explained in section 7.1 of Evoenergy's Tariff Structure Explanatory Statement (TSES).¹⁵ Evoenergy estimates the standalone cost equal to the avoidable cost for each tariff class, plus total common costs.¹⁶

The sum of the revenue that Evoenergy expects to recover from each tariff class allows Evoenergy to recover the expected revenue for the relevant services in accordance with the AER's determination. This is demonstrated in compliance table 1 of the SCS pricing model.¹⁷

Each tariff includes a price that is based on the LRMC of providing network services to retail customers assigned to that tariff. Evoenergy escalates standalone cost, avoidable cost and LRMC for the effects of inflation each year, based on the consumer price index (CPI). Apart from CPI escalation, these input values are unchanged from the 2024-29 tariff structure statement.

Evoenergy's proposed network prices also reflect its careful consideration of the impact on customers of changes in tariffs from year to year. Evoenergy sets out the network bill impacts of its proposed prices in further detail in Attachment E – 2024-25 pricing proposal overview.

5. Indicative prices

Indicative prices for tariffs for standard control services are provided in input tables 29 and 30 of the SCS pricing model.¹⁸ Indicative price caps for alternative control services are provided in the ACS pricing model.¹⁹ These indicative price levels have been determined in accordance with the 2024-29 tariff structure statement and updated to account for this pricing proposal.

Evoenergy's proposed network use of system (NUOS) prices have seen small increases compared to the indicative NUOS prices that accompanied Evoenergy's proposed TSS for the 2024-29 regulatory period.²⁰ These modest increases are principally driven by updated net transmission charges payable to Transgrid, which have increased Evoenergy's expected revenue in 2024-25. The changes to NUOS prices also reflect updated distribution and transmission revenues from the AER's final decision for 2024-29, and updated quantity forecasts (as described in Section 2).

6. Tariff components

This section describes the discrete elements that make-up Evoenergy's proposed NUOS prices.

¹⁴ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Compliance', 10 May 2024.

¹⁵ AER, *Evoenergy distribution determination 2024-29 – revised tariff structure explanatory statement*, Final decision, April 2024, pp 72-76.

¹⁶ AER, *Evoenergy distribution determination 2024-29 – revised tariff structure explanatory statement*, Final decision, April 2024, p 77.

¹⁷ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Compliance', 10 May 2024.

¹⁸ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Indicative prices', 10 May 2024.

¹⁹ Evoenergy, *Evoenergy 2023-24 - Annual ACS pricing model*, worksheets 'Ancillary Network Services', 'Labour Rates', 'Metering', 10 May 2024.

²⁰ Evoenergy, *Appendix 4.2: Indicative pricing schedule*, Revised proposal, 30 November 2023.

6.1. Distribution use of system charges

Evoenergy's proposed distribution use of system charges are presented in the 'Tariff schedule' worksheet of the SCS pricing model.²¹ The revenue expected to be recovered from these charges does not exceed the estimated amount of distributed use of system revenue, adjusted for any over- or under-recovery. This is demonstrated in output table 6 of the SCS pricing model.²²

The over or under recovery amount is calculated in a manner consistent with the AER's final decision for control mechanisms.²³

Other adjustments to DUOS include the Service Target Performance Incentive Scheme (STPIS) which is based on Evoenergy's network reliability and customer service performance calculated in accordance with the AER's STPIS guideline.²⁴

Evoenergy is able to claim costs from Retailer of Last Resort (RoLR) events in which a retailer stops being solvent resulting in unpaid network charges. Evoenergy is not seeking to recover any RoLR costs in the 2024-25 regulatory year. Should RoLR costs arise in future, Evoenergy will include them in its relevant pricing proposal, along with supporting documentation.

6.2. Designated pricing proposal charges

Evoenergy's proposed designated pricing proposal charges (DPPC) are presented in the 'Tariff schedule' worksheet of the SCS pricing model.²⁵ The revenue expected to be recovered from these charges does not exceed the estimated amount of designated pricing proposal revenue, adjusted for any over- or under-recovery. This is demonstrated in output table 6 of the SCS pricing model.²⁶

The over- or under-recovery amount is calculated consistent with the AER's final decision for control mechanisms and is compliant with the National Electricity Rules (NER).²⁷

Evoenergy's DPPC amounts comprise:

- the annual smoothed revenue for prescribed transmission services (Evoenergy's dual function assets);
- net transmission charges paid to transmission network service providers (TNSPs); and
- avoided transmission use of system (TUOS) payments to customers.

The net transmission charges are determined using transfer payment information provided by Transgrid to Evoenergy for 2024-25. The transmission pricing information from Transgrid and supporting calculations are provided in Attachment F.

Evoenergy passes on avoided customer TUOS payments to connection applicants in accordance with rule 5.3AA(h) of the NER. Evoenergy forecasts the level of avoided TUOS payments based on actual payments historically made to customers and trends in payment volumes over time.

²¹ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Tariff schedule', 10 May 2024.

²² Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Tables', 10 May 2024.

²³ AER, *Evoenergy Electricity Distribution Determination 2024 to 2029 – Attachment 14: Control mechanisms*, Final decision, April 2024, pp 17-20.

²⁴ AER, *Electricity distribution network service providers – service target performance incentive scheme version 2.0*, November 2018.

²⁵ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Tariff schedule', 10 May 2024.

²⁶ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Tables', 10 May 2024.

²⁷ AER, *Evoenergy Electricity Distribution Determination 2024 to 2029 – Attachment 14: Control mechanisms*, Final decision, April 2024, pp 17-20.

6.3. System strength charges

Evoenergy is not planning to pass through system strength charges for system strength connection points for the 2024-25 regulatory year.

If system strength charges arise, Evoenergy will pass through these charges in accordance with NER clause 6.20.3A. Evoenergy will bill Distribution Network Users on a pass-through basis so that the amount, structure, and timing of the amount billed replicates as far as is reasonably practicable the amount, structure and timing of the corresponding system strength charge billed to Evoenergy by the System Strength Service Provider (i.e., Transgrid). Evoenergy will issue a bill for system strength charges to the relevant Distribution Network User that will identify the relevant system strength connection point and provide other information required by the Distribution Network User to verify the charge.

6.4. Jurisdictional scheme amounts

In December 2023, the AER determined that the ACT Government's large-scale feed-in tariff (LFiT) scheme has ceased to be a jurisdictional scheme because it does not meet the jurisdictional scheme eligibility criteria.²⁸ During the 2024–29 regulatory period, Evoenergy will recover LFiT amounts outside of AER-approved network charges and in accordance with the requirements of ACT legislation.

Apart from the LFiT scheme ceasing to be a jurisdictional scheme, Evoenergy's other jurisdictional schemes have not been amended since the lodgement of its TSS.

Tariffs designed to pass on jurisdictional scheme amounts are available in the 'Tariff schedule' sheet of the SCS pricing model.²⁹ The revenue expected to be recovered from these tariffs does not exceed the estimated amount of jurisdictional scheme amounts adjusted for any over- or under-recovery. This is demonstrated in output table 6 of the SCS pricing model.³⁰

The over- or under-recovery amount is calculated in a manner consistent with the AER's final decision for control mechanisms and is compliant with the NER.³¹

Evoenergy currently has three jurisdictional schemes:

- **Small and medium feed in tariff scheme**, which is forecast based on average generation, customer numbers, and contract prices under the scheme;
- **Energy Industry Levy**, which is forecast based on actual payments in prior years; and
- **Utilities Network Facilities Tax (UNFT)**, which is forecast by applying the ACT Government's UNFT rate to the forecast network length in the upcoming year.

Evoenergy's pricing proposal includes an adjustment for historical under/over recoveries that were already included within LFiT scheme amounts determined by the ACT Government (before the LFiT scheme ceased to be a jurisdictional scheme in December 2023). The adjustment is necessary to avoid double counting under/over recoveries and has been applied by Evoenergy consistent with the methodology set out in the AER's final decision for control mechanisms.³² The adjustment is shown in input table 7 of the SCS pricing model,³³ and the supporting calculations are provided in Attachment F.

²⁸ AER, *Cessation of Jurisdictional Scheme – ACT Large-scale Feed-in Tariff Scheme*, 11 December 2023.

²⁹ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Tariff schedule', 10 May 2024.

³⁰ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Tables', 10 May 2024.

³¹ AER, *Evoenergy Electricity Distribution Determination 2024 to 2029 – Attachment 14: Control mechanisms*, Final decision, April 2024, pp 17-20.

³² AER, *Evoenergy Electricity Distribution Determination 2024 to 2029 – Attachment 14: Control mechanisms*, Final decision, April 2024, pp 17-20.

³³ Evoenergy, *Evoenergy - 2024-25 Annual SCS Pricing Model*, worksheet 'Financial', 10 May 2024.

7. Compliance

7.1. Compliance with the determination

Evoenergy confirms that its tariff assignment policy and the methodology in which it reviews and assesses the basis on which a customer is charged is unchanged from the 2024-29 TSS and is compliant with the NER.³⁴

Evoenergy also confirms its compliance with the 2024-29 TSS, which sets out Evoenergy’s commitment to ensure network pricing is transparent, equitable, and fair for all customers, while also being easy to understand and providing price signals that enable efficient network use and investment decisions.

Evoenergy wishes to note that it has identified a technical discrepancy in its billing system whereby, in limited circumstances, customers may be automatically re-assigned to default network tariffs after opting out. Evoenergy is working to correct this as a matter of priority.

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

7.2. Compliance Table

Table 3: 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

³⁴ AER, *Evoenergy distribution determination 2024-29 – revised tariff structure explanatory statement*, Final decision, April 2024, pp 30-35.

6.18.3

Chapter 7 - Compliance

6.18.4

6.18.2(b)(7)

6.18.2(b)(8)

I, Peter Billing, General Manager Evoenergy, confirm that the above statements are true and correct.



[signature]

9/5/2024
[date]