

Draft Decision

SA Power Networks Electricity Distribution Determination 2025 to 2030 (1 July 2025 to 30 June 2030)

Attachment 1 Annual revenue requirement

September 2024

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Contents

1	Annual revenue requirement	1
1.1	Draft decision.....	1
1.2	SA Power Networks' proposal.....	2
1.3	Assessment approach	3
1.4	Reasons for draft decision	6
	Shortened forms	18

1 Annual revenue requirement

This attachment sets out our draft decision on SA Power Networks' annual revenue requirement (ARR) and expected revenues for the provision of standard control services (SCS) over the 2025–30 regulatory control period. Specifically, it sets out our draft decision on:¹

- the ARRs (unsmoothed), which are the sum of annual building block costs
- the total revenue requirement, which is the sum of the ARRs
- the annual expected revenues (smoothed)
- the X factors.

This attachment discusses our draft decision on the above for the main SCS, with metering SCS being discussed in Attachment 20.

We determine SA Power Networks' ARR using a building block approach. We determine the X factors by smoothing the ARR over the 2025–30 period. The X factor is used in the CPI–X methodology to determine the annual expected revenue (smoothed).

1.1 Draft decision

We determine a total ARR of \$5,126.2 million (\$ nominal, unsmoothed) for SA Power Networks over the 2025–30 period for the main SCS. This amount reflects our draft decision on the various building block costs and represents a reduction of \$28.7 million (0.6%) to SA Power Networks' proposed total ARR of \$5,154.8 million. This reduction is largely driven by the lower return on capital and regulatory depreciation building blocks determined in this draft decision, which have been partially offset by higher revenue adjustments and a higher cost of corporate income tax building block.

We determine the annual expected revenue (smoothed) and X factor for each regulatory year for the 2025–30 period by smoothing the ARR. For the 2025–30 period, our draft decision is to approve total expected revenues of \$5,143.5 million (\$ nominal, smoothed) for SA Power Networks.

At the time of making this draft decision, we have used placeholder values for certain components such as the rate of return and expected inflation. We will make further updates for these values as part of our final decision. It is for this reason that we expect the total expected revenues approved in our final decision to be different to this draft decision.

Table 1.1 sets our draft decision on the building block costs, the ARR, annual expected revenue and X factors for SA Power Networks over the 2025–30 period.

¹ NER, cll. 6.3.2(a)(1), 6.5.9(a) and 6.5.9(b)(1)–(2).

Table 1.1 AER's draft decision on SA Power Networks' ARR, annual expected revenue and X factor for the 2025–30 period (\$ million, nominal)

	2025–26	2026–27	2027–28	2028–29	2029–30	Total
Return on capital	313.2	325.2	340.3	358.4	379.2	1,716.3
Regulatory depreciation ^a	261.5	266.5	262.0	205.2	205.4	1,200.6
Operating expenditure ^b	400.6	414.4	430.8	447.5	467.8	2,161.2
Revenue adjustments ^c	2.3	–18.1	–17.9	28.0	10.1	4.4
Cost of corporate income tax	12.6	13.4	10.4	4.7	2.6	43.8
Annual revenue requirement (unsmoothed)	990.3	1,001.4	1,025.6	1,043.8	1,065.1	5,126.2
Annual expected revenue (smoothed)	939.8	976.3	1,006.6	1,102.1	1,118.8	5,143.5
X factor ^d	n/a ^e	–1.00%	–0.25%	–6.45%	1.30%	n/a

Source: AER analysis.

- (a) Regulatory depreciation is straight-line depreciation net of the inflation indexation on the opening regulatory asset base (RAB).
- (b) Includes debt raising costs.
- (c) Includes revenue adjustments from the efficiency benefit sharing scheme (EBSS), the capital expenditure sharing scheme (CESS), shared asset adjustment and the demand management innovation allowance mechanism (DMIAM).
- (d) The X factors will be revised to reflect the annual return on debt update. Under the CPI-X framework, the X factor measures the real rate of change in annual expected revenue from one year to the next. A negative X factor represents a real increase in revenue. Conversely, a positive X factor represents a real decrease in revenue.
- (e) SA Power Networks is not required to apply an X factor for 2025–26 because we set the 2025–26 expected revenue in this decision. The expected revenue for 2025–26 is around 3.0% higher than the approved total annual revenue for 2024–25 in real terms, or 5.9% higher in nominal terms.

Our draft decision also allows SA Power Networks to recover \$29.8 million (\$ nominal, smoothed) from its customers for the 2025–30 period for legacy metering services. Our assessment of metering revenue is not included in the total revenue set out in this attachment and is discussed in Attachment 20 of this draft decision.

1.2 SA Power Networks' proposal

SA Power Networks proposed a total expected revenue (smoothed) of \$5,164.0 million (\$ nominal) for the 2025–30 period. Table 1.2 shows SA Power Networks proposed building block costs, the ARR, expected revenue and X factor for each year of the 2025–30 period.

Table 1.2 SA Power Networks' proposed ARR, annual expected revenue and X factor for the 2025–30 period (\$ million, nominal)

	2025–26	2026–27	2027–28	2028–29	2029–30	Total
Return on capital	315.5	330.3	348.3	370.2	395.7	1,760.0
Regulatory depreciation ^a	279.5	284.6	280.2	224.2	224.9	1,293.3
Operating expenditure ^b	399.3	411.6	426.4	441.4	459.9	2,138.6
Revenue adjustments ^c	–25.5	–46.5	–46.9	40.7	11.0	–67.1
Cost of corporate income tax	11.1	11.2	7.2	0.4	0.0	29.9
Annual revenue requirement (unsmoothed)	979.9	991.3	1,015.2	1,077.0	1,091.5	5,154.8
Annual expected revenue (smoothed)	952.0	980.6	1,010.0	1,097.0	1,124.4	5,164.0
X factor	n/a ^d	–0.49%	–0.49%	–5.97%	0.00%	n/a

Source: SA Power Networks, *1.1–Post Tax Revenue Model*, January 2024.

- (a) Regulatory depreciation is straight-line depreciation net of the inflation indexation on the opening RAB.
(b) Includes debt raising costs.
(c) Includes revenue adjustments from EBSS, CESS, shared asset adjustment and DMIAM. SA Power Networks' proposed revenue adjustments also includes an amount for 'Innovation fund' and an amount for 'Cable and Conductor Repairs Adjustment for 2020–25'.
(d) SA Power Networks is not required to apply an X factor for 2025–26 because we set the 2025–26 expected revenue in this decision.

1.3 Assessment approach

In this section, we describe the building block approach used to determine the ARR and expected revenue for SA Power Networks for each year of the 2025–30 period.²

1.3.1 The building block approach

The ARR is calculated using the post-tax revenue model (PTRM).³ For the applicable control mechanism (Attachment 14) applying to SCS, the revenue to be earned by the distributor (expected revenues) for the regulatory control period must be equal to the net present value (NPV) of the total revenue requirement.⁴ The total revenue requirement is the sum of the ARRs for the regulatory control period. In turn, the ARR must be determined using a building block approach.⁵ Therefore, we adopt a building block approach when making our decision on SA Power Networks' total ARR and expected revenue for each regulatory year of the regulatory control period. Under this approach, we determine the value of the building block costs that make up the ARR for each regulatory year. The ARR for each year is the sum of the building block costs. These building block costs are set out in section 1.3.2.

² NER, cl. 6.3.2(a)(1), 6.5.9(b)(2).

³ NER, cl. 6.4.2.

⁴ NER, cl. 6.5.9(b)(3)(i).

⁵ NER, cl. 6.4.3.

We developed the PTRM, which brings together the various building block costs and calculates the ARR for each year of the regulatory control period.⁶ The PTRM also calculates the X factors required under the CPI–X methodology⁷ which is used to escalate the expected revenue for each year (other than the first year) of the regulatory control period.⁸ Using the X factors and ARR, the annual expected revenue (smoothed) is forecast for each year of the regulatory control period. SA Power Networks’ proposal must be prepared using our PTRM.⁹

The ARR can be lumpy over the regulatory control period. To minimise price shocks, revenues are smoothed within a regulatory control period while maintaining the principle of cost recovery under the building block approach. Smoothing requires diverting some of the cost recovery to adjacent years within the regulatory control period so that the NPV of the annual expected revenue (smoothed revenues) is equal to the NPV of the ARR (unsmoothed revenues). That is, a smoothed profile of the expected revenue is determined for the regulatory control period under the CPI–X methodology.

The expected revenue for the first year is generally set equal to the ARR for the first year of the regulatory control period. At times, it may be more appropriate to set the expected revenue for the first year to align with the revenue from the last year of the previous regulatory control period to avoid any large revenue variation between periods (or P_0).¹⁰

In this determination for SA Power Networks, we first calculate the ARR for each year of the 2025–30 period. To do this we consider the various costs facing SA Power Networks and the trade-offs and interactions between these costs, service quality and across years. This reflects our holistic assessment of SA Power Networks’ proposal.

We understand the trade-offs that occur between building block costs and test the sensitivity of these costs to their various driver elements. These trade-offs are discussed in the interrelationships section of the various attachments to this draft decision and are reflected in the calculations made in the PTRM.¹¹ Such understanding allows us to exercise judgement in determining the final inputs into the PTRM and the ARR that result from this modelling.

Having determined the total revenue requirement for the 2025–30 period, we smooth the ARR for each regulatory year across that period. This step reduces revenue variations between years, and calculates the expected revenue and X factor for each year.¹² The X

⁶ NER, cl. 6.4.2.

⁷ NER, cl. 6.2.6(a).

⁸ NER, cl. 6.5.9.

⁹ NER, cl. 6.3.1(c).

¹⁰ The expected revenue for year 1 of the next regulatory control period may include adjustments for the performance incentive that applied during the previous regulatory control period, and under or over recovery adjustments from previous regulatory years.

¹¹ There are trade-offs that are not modelled in the PTRM but are reflected in the inputs to the PTRM. For example, service quality is not explicitly modelled in the PTRM, but the trade-offs between service quality and price are reflected in the forecast capital expenditure and operating expenditure inputs to the model. Other trade-offs are obvious from the calculations in the PTRM. For example, while it may be expected that a lower RAB would also lower revenues, the PTRM shows that this will not occur if the reduction in the RAB is due solely to an increase in the depreciation rate. In such circumstances, revenues increase as the increased depreciation more than offsets the reduction in the return on capital caused by the lower RAB.

¹² NER, cl. 6.5.9(a).

factors equalise (in net present value terms) the total expected revenues to be earned by SA Power Networks with the total revenue requirement for the 2025–30 period.¹³ The X factor profile must also minimise, as far as reasonably possible, the variance between the expected revenue and ARR for the last regulatory year of the period.¹⁴ By minimising this divergence, it helps to manage the prospect of a significant revenue change (and consequently prices) between the last year of the 2025–30 period, and first year of the following 2030–35 period. We consider a divergence of up to 3% between the expected revenue and ARR for the last year of the regulatory control period is reasonable, if this can promote smoother price changes across the regulatory control periods.

The building block costs (and the elements that drive those costs) used to determine the unsmoothed ARR are set out in section 1.3.2.

1.3.2 Building block costs

The efficient costs to be recovered by a distributor can be thought of as being made up of various building block costs. Our draft decision assesses each of the building block costs and the elements that drive these costs. The building block costs are approved reflecting trade-offs and interactions between the cost elements, service quality and across years.

Table 1.3 shows the building block costs that form the ARR for each year and where discussion on the elements that drive these costs can be found within this draft decision.

Table 1.3 Building block costs

Building block costs	Attachments where elements are discussed
Return on capital	Regulatory asset base (Attachment 2) Rate of return (Attachment 3) Capital expenditure (Attachment 5)
Regulatory depreciation (return of capital)	Regulatory asset base (Attachment 2) Regulatory depreciation (Attachment 4) Capital expenditure (Attachment 5)
Operating expenditure	Operating expenditure (Attachment 6)
Estimated cost of corporate income tax	Corporate income tax (Attachment 7)
Other revenue adjustments	
Adjustments for shared assets	Annual revenue requirement (Attachment 1)
Operating efficiency benefits/penalties	Efficiency benefit sharing scheme (Attachment 8)

¹³ NER, cl. 6.5.9(b)(3)(i). The X factors represent the real revenue path over the 2025–30 period under the CPI-X framework.

¹⁴ NER, cl. 6.5.9(b)(2).

Building block costs	Attachments where elements are discussed
Capital efficiency benefits/penalties	Capital expenditure sharing scheme (Attachment 9)
Demand management innovation allowance	Demand management incentive scheme and Demand management innovation allowance mechanism (Attachment 11)

1.4 Reasons for draft decision

We determine a total ARR of \$5,126.2 million (\$ nominal, unsmoothed) for SA Power Networks over the 2025–30 period. This is a reduction of \$28.7 million (0.6 %) to SA Power Networks’ proposed total ARR of \$5,154.8 million for this period. This reflects the impact of our draft decision on the various building block costs.

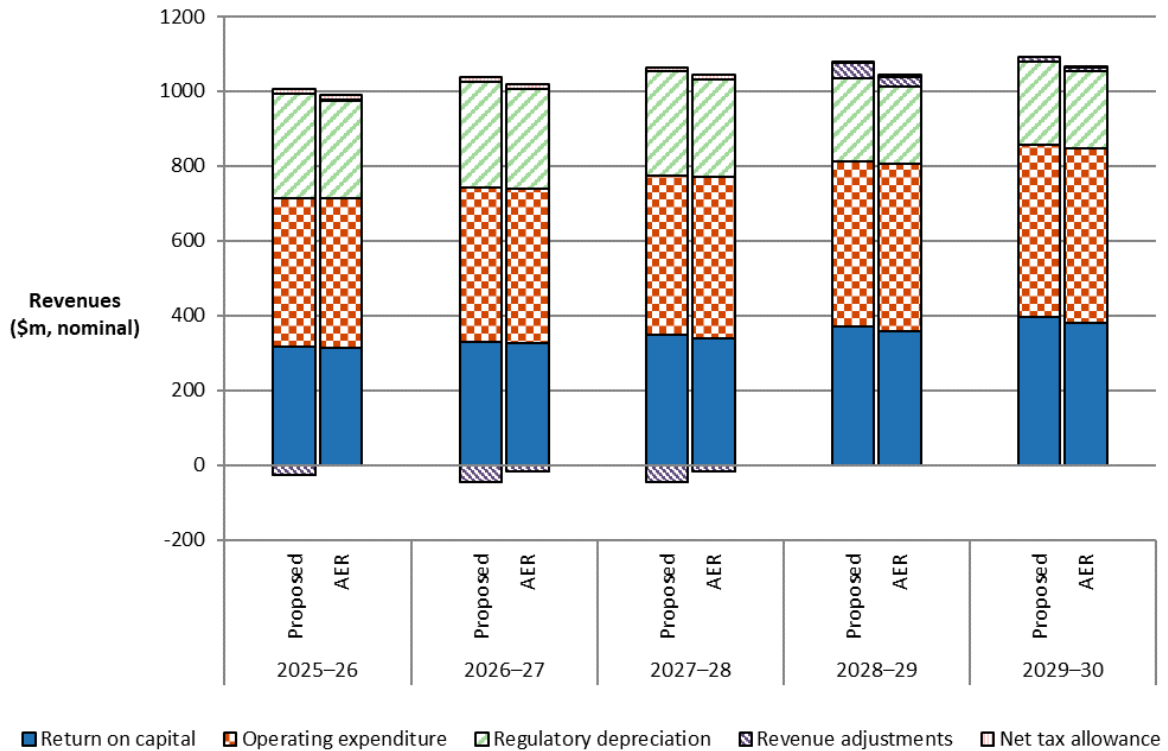
The changes we made to SA Power Networks’ proposed building blocks include (in nominal terms):

- a reduction in the return on capital of \$43.7 million (2.5%) (Attachments 2, 3 and 5). This is driven primarily by a lower opening RAB, forecast capital expenditure (capex) and rate of return in our draft decision compared to SA Power Networks’ proposal.
- a reduction in the regulatory depreciation of \$92.8 million (7.2%) (Attachments 2, 4 and 5). This is driven primarily by a higher expected inflation rate in our draft decision compared to SA Power Networks’ proposal, which increases the indexation adjustment to regulatory depreciation. It is also driven by our reduction to forecast capex and a lower opening RAB.
- an increase in the operating expenditure (opex) forecast of \$22.5 million (1.1 %) (Attachment 6). This is due to the higher expected inflation rate applied in this draft decision compared to SA Power Networks’ proposal. Our draft decision has accepted SA Power Networks’ proposed total opex in real 2024–25 dollar terms (Attachment 6).
- an increase in the cost of corporate income tax of \$13.8 million (46.2%) (Attachment 7). This is driven primarily a lower tax depreciation amount determined in this draft decision compared to SA Power Networks’ proposal.
- an increase in the revenue adjustments of \$71.4 million (Attachments 8, 9 and 11). This is driven primarily by our decision to remove SA Power Networks’ proposed negative revenue adjustments over 2025–30 for cables and conductors error correction, as we have instead revoked and substituted the 2020–25 determination to reflect this adjustment.¹⁵ In our draft decision we have also determined a CESS benefit and a higher EBSS penalty compared to SA Power Networks’ proposal. Our draft decision also does not accept SA Power Networks’ proposed revenue adjustment for an innovation fund.

¹⁵ AER, *Revocation and substitution determination of SA Power Networks’ 2020–25 distribution determination*, March 2024.

Figure 1.1 shows the building block components from our determination that make up the ARR for SA Power Networks, and the corresponding components from its proposal.

Figure 1.1 AER's draft decision and SA Power Networks' proposed ARR (\$ million, nominal)



Source: AER analysis; SA Power Networks, *1.1-Post Tax Revenue Model*, January 2024.

Note: Revenue adjustments include EBSS, CESS, shared asset adjustment and DMIAM amounts. Opex includes debt raising costs.

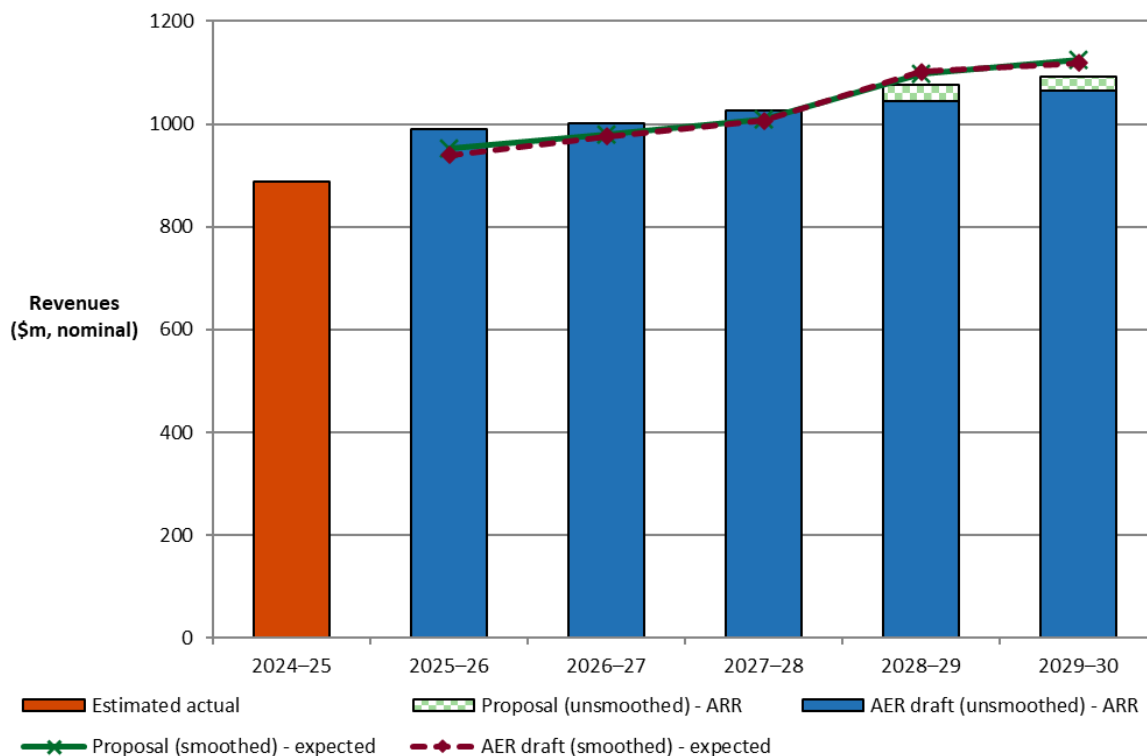
1.4.1 X factor and annual expected revenue

For this draft decision, we determine an X factor for SA Power Networks of -1.00% , -0.25% and -6.45% for period from 2026–27 to 2028–29, followed by an X factor of 1.30% for 2029–30.¹⁶ The NPV of the ARRs is \$4,300.6 million (\$ nominal) as at 1 July 2025. Based on this NPV and applying the CPI–X framework, we determine that the expected revenue (smoothed) for SA Power Networks is \$939.8 million in 2025–26 increasing to \$1,118.8 million in 2029–30 (\$ nominal). The resulting total expected revenue is \$5,143.5 million for the 2025–30 period.

Figure 1.2 shows our draft decision on SA Power Networks' annual expected revenue (smoothed revenue) and the ARR (unsmoothed revenue) for the 2025–30 period.

¹⁶ SA Power Networks is not required to apply an X factor for 2025–26 because we set the 2025–26 expected revenue in this decision.

Figure 1.2 AER’s draft decision on SA Power Networks’ revenue for the 2025–30 period (\$ million, nominal)



Source: AER analysis; SA Power Networks, *1.1-Post Tax Revenue Model*, January 2024.

To determine the profile of expected revenue for SA Power Networks over the 2025–30 period, we have set the expected revenue for the first regulatory year at \$939.8 million (\$ nominal). This is \$50.5 million lower than the ARR for that first year. We then apply an expected inflation rate of 2.85% per annum and a profile of X factors to determine the expected revenue in subsequent years.¹⁷

The X factors we set must be such as to minimise, as far as reasonably possible, the variance between the expected revenue (smoothed) and the ARR (unsmoothed) in the last year of the 2025–30 period.¹⁸ This helps to minimise any potential large revenue variance (and thus price shocks) at the commencement of the 2030–35 period. Our standard approach has been to keep a divergence of up to +/-3% between the smoothed and unsmoothed revenues for the last year of the regulatory period, if this can achieve smoother price changes across the regulatory control periods.

Although some stakeholders raised concerns about aspects of SA Power Networks’ price stability narrative (discussed in section 1.4.4), no concerns were raised specifically for SA Power Networks’ proposed revenue smoothing profile. In its submission, the Energy and

¹⁷ NER, cl. 6.5.9(a).

¹⁸ NER, cl. 6.5.9(b)(2).

Water Ombudsman of South Australia (EWOSA) was supportive of SA Power Networks' proposed approach to revenue smoothing, despite its concerns on forecast expenditure.¹⁹

For this draft decision, we approved lower revenues than SA Power Networks' proposal. This is mainly driven by our reduction to SA Power Networks' forecast capex. However, our draft decision allows for higher revenues than those determined in the 2020–25 period (discussed further below). SA Power Networks' unsmoothed revenue for the first year of the 2025–30 period (2025–26) is about 5.9% (nominal) higher than its approved revenue for the last year of the 2020–25 period (2024–25).

We are mindful that the magnitude of this increase in revenue would have a significant impact on network charges for SA Power Networks' customers. Consequently, we have smoothed the increase in expected revenues over the first 3 years of the 2025–30 period for SA Power Networks.

We have also adopted SA Power Networks' proposed adjustment to the revenue smoothing profile to account for the impact of the cessation of the South Australian Government's Solar Feed-in Tariff Scheme from 1 July 2028.²⁰ In our previous decisions, we have accounted for such known impacts which are material (and sits outside of our building block determination) in our total revenue smoothing approach to provide an overall smoother revenue outcome. SA Power Networks submitted that the cessation of the Scheme is expected to result in the removal of approximately \$75 million in annual revenue from 2028–29 onwards.²¹ As such, we have accounted for this impact by applying a larger increase in the smoothed revenue for year 4 (2028–29), which will be offset by the anticipated reduction in revenue at the annual pricing stage.

We have relaxed our standard approach to the final year difference between the smoothed and unsmoothed revenues being kept to +/-3%, to further help ease the price increases for customers in the earlier years of the 2025–30 period. In the present circumstances, we have determined that the final year revenue difference is about 5%.

We consider that our profile of X factors results in an expected revenue in the last year of the regulatory control period that is as close as reasonably possible to the ARR for that year.²² We will review this smoothing profile for the final decision.

Our draft decision results in an average increase of 4.7% per annum (\$ nominal) in the expected revenue over the 2025–30 period.²³ This consists of initial increase of 5.9% in

¹⁹ Energy and Water Ombudsman of South Australia (EWOSA), *Submission to the Australian Energy Regulator's Issues Paper: SA Power Networks Electricity Distribution Determination 2025–30*, p. 2, 14 May 2024.

²⁰ SA Power Networks, *Attachment 1-Annual revenue requirement and control mechanism*, January 2024, pp. 9–10.

²¹ SA Power Networks, *Response to AER information request #035*, 20 August 2024, p. 4.

²² NER, cl. 6.5.9(b)(2).

²³ In real 2024–25 dollar terms, our approved expected revenue for SA Power Networks results in an average increase of 1.8% per annum over the 2025–30 period.

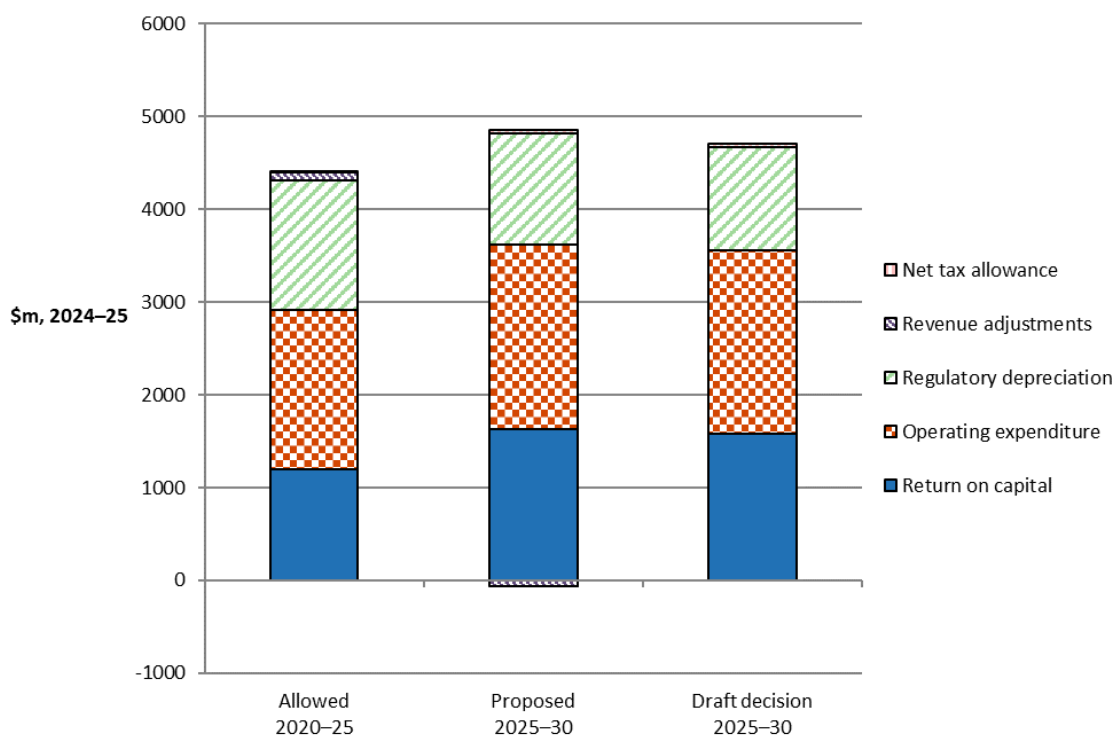
2025–26, followed by average annual increases of 4.5% during the remainder of the 2025–30 period.²⁴

Our draft decision results in an increase of \$1,208.1 million (30.8%) in nominal dollar terms to SA Power Networks’ total ARR relative to that in the 2020–25 period.²⁵ This is because:

- Approximately 45% of the increase is due to factors potentially outside the control of SA Power Networks. This includes higher actual inflation rates for the 2020–25 period, which increase the indexation component of the RAB. It is also driven by higher interest rates for the 2025–30 period, which lead to a higher forecast rate of return (Attachment 3). Together, these changes in market variables result in a much higher return on capital building block compared to the current period.
- The other 55% of the increase is driven by a higher regulatory depreciation (Attachment 4) and a higher opex (Attachment 6) determined in this draft decision for the 2025–30 period than that approved in the 2020–25 determination.

Figure 1.3 compares our draft decision building blocks for SA Power Networks’ 2025–30 period with its proposal for the same period, and the approved unsmoothed revenue for the 2020–25 period.

Figure 1.3 Total revenue by building block components (\$ million, 2024–25)



Source: AER analysis.

²⁴ In real 2024–25 dollar terms, this consists of initial increase of 3.0% in 2025–26, followed by annual average increases of 1.6% during the remainder of the 2025–30 period.

²⁵ In real 2024–25 dollar terms, our draft decision results in an increase of \$295.9 million (6.7%) to SA Power Networks’ total ARR relative to that in the 2020–25 period.

1.4.2 Shared assets

Distributors, such as SA Power Networks, may use assets to provide both the SCS we regulate and unregulated services, for example by the stringing of telecommunications cables on the electricity network poles for the provision of telecommunication services. These assets are called ‘shared assets’.²⁶ If the revenue from shared assets is material, 10% of the unregulated revenues that a distributor earns from shared assets will be used to reduce the distributor's revenue for SCS.²⁷

The shared asset principles establish that use of shared assets should be material before cost reductions are applied.²⁸ The National Electricity Rules (NER) do not define materiality in this context. Our approach to what constitutes a material use of shared assets is that unregulated use of shared assets in a specific regulatory year is material when a distributor's annual average unregulated revenue from shared assets is expected to be greater than 1% of its expected revenue for that regulatory year.²⁹

SA Power Networks submitted that its total revenue requirement is subject to a shared asset adjustment because its forecast annual unregulated revenue from shared assets exceeded the AER's materiality threshold.³⁰

We consider SA Power Networks' forecast unregulated revenues from shared assets for the 2025–30 period are reasonable, noting that its forecasts have increased compared to the 2020–25 period due to an increase of the rental of overhead and underground distribution assets for telecommunication services as well as an increase in property and IT revenue.³¹ SA Power Networks' forecast unregulated revenues must be compared to the regulated revenues we determine, rather than those proposed by SA Power Networks. Our draft decision sets lower expected revenues than SA Power Networks' proposal. Based on these lower expected revenues, we calculated that SA Power Networks' unregulated revenues will be greater than 1% of its expected revenues in each year of the 2025–30 period. Hence, the materiality threshold is met in each year of the 2025–30 period and we apply a shared asset revenue adjustment over this period.³²

For this draft decision, we have determined a shared asset revenue adjustment as shown in Table 1.4. The adjustment will see \$9.6 million (\$2024–25) shared with customers across the 2025–30 period. SA Power Networks had used a slightly different method³³ than required by the shared asset guideline. The difference creates small annual variations between the two

²⁶ NER, cl. 6.4.4.

²⁷ AER, *Shared asset guideline*, November 2013, Appendix A, p. 15.

²⁸ NER, cl. 6.4.4(c)(3).

²⁹ AER, *Shared asset guideline*, November 2013, pp. 8–9.

³⁰ SA Power Networks, *Attachment 1-Annual revenue requirement and control mechanism*, January 2024, p. 13.

³¹ AER analysis; SA Power Networks, *RIN.01-Forecast Data*, January 2024.

³² We will reassess the materiality of the forecast shared asset unregulated revenues for our final decision.

³³ SA Power Networks has averaged forecast shared asset revenues in nominal terms before applying the 10% sharing factor, and then determined the real amounts set out in the proposed PTRM. We apply the 10% sharing factor to the real forecast shared asset revenues.

approaches, but in total the differences between our adjustment and SA Power Networks' adjustment are not material in real terms.

Table 1.4 AER's draft decision on SA Power Networks' shared asset revenue adjustment (\$ million, 2024–25)

	2025–26	2026–27	2027–28	2028–29	2029–30	Total
SA Power Networks' proposal	-1.9	-1.9	-1.9	-1.9	-1.9	-9.6
AER's draft decision	-1.9	-1.9	-1.9	-1.9	-1.9	-9.6

Source: AER analysis; SA Power Networks, *1.1–Post Tax Revenue Model*, January 2024.

1.4.3 Indicative average distribution price impact

Our draft decision on SA Power Networks' expected revenues ultimately affects the prices consumers pay for electricity. There are several steps required in translating our revenue decision into indicative distribution price impacts.

We regulate SA Power Networks' SCS under a revenue cap form of control. This means our draft decision on SA Power Networks' expected revenues does not directly translate to price impacts. This is because SA Power Networks' revenue is fixed under the revenue cap form of control, so changes in the consumption of electricity will affect the prices ultimately charged to consumers.

We are not required to establish the distribution prices for SA Power Networks as part of this determination. However, we will assess SA Power Networks' annual pricing proposals before the commencement of each regulatory year within the 2025–30 period. In each assessment we will administer the pricing requirements set in this distribution determination.

For this draft decision, we have estimated some indicative average distribution price impacts flowing from our determination on the expected revenues for SA Power Networks over the 2025–30 period. In this section, our estimates only relate to SCS (that is, the core electricity distribution charges),³⁴ not alternative control services (such as public lighting). These indicative price impacts assume that actual energy consumption across the 2025–30 period matches SA Power Networks' forecast energy consumption, which we have adopted for calculating the indicative price path. We also have not factored in any changes arising from incentive scheme amounts, cost pass throughs or unders/overs reconciliation that usually occur in the annual pricing process to come up with the total allowed revenue.

The South Australian Council of Social Service (SACOSS) in its submission noted that SA Power Networks' forecast energy consumption showed an increasing trend over the 2025–30 period while conversely, AEMO's forecast showed a decline for residential consumption.³⁵

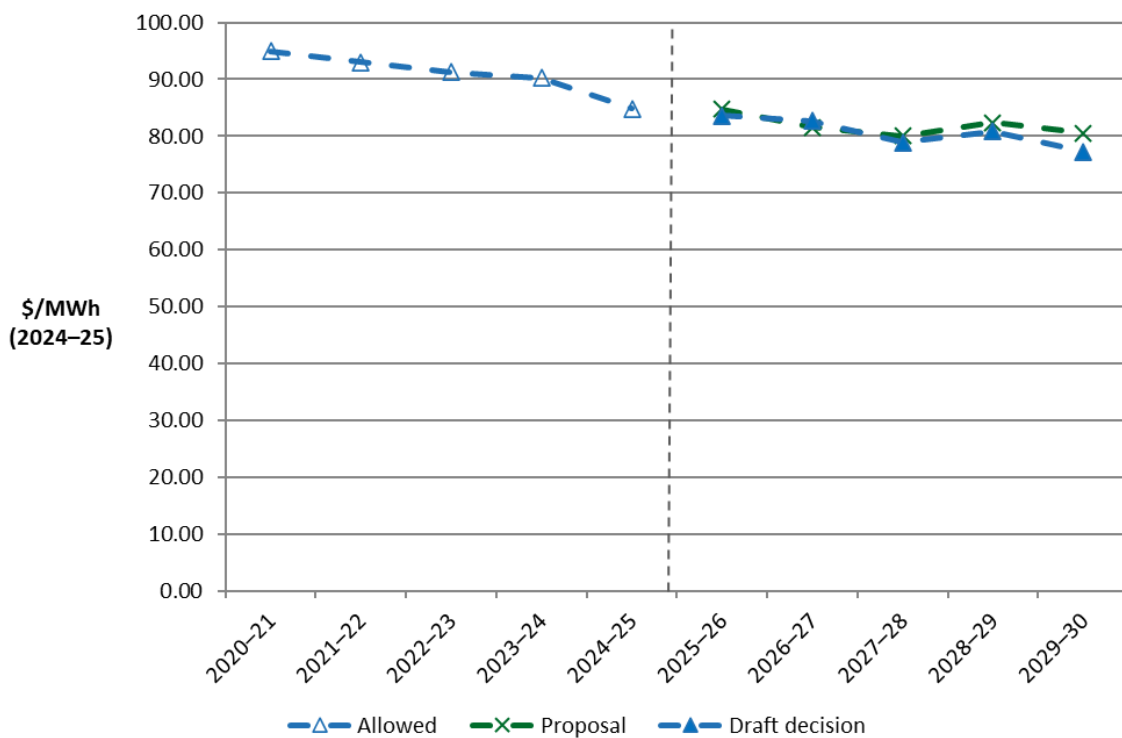
³⁴ SA Power Networks has reclassified its legacy metering services from alternative control services (ACS) to SCS in its revised proposal based on the AEMC's review of the regulatory framework for metering services in August 2023 and our guidance on metering issued in November 2023. SA Power Networks, *Attachment 1 - Annual revenue requirement and control mechanism*, January 2024, p. 8. Our final decision on metering services is discussed in Attachment 20.

³⁵ SACOSS, *Submission to the Australian Energy Regulator on the SA Power Networks Electricity Distribution Determination 2025-30: Issues Paper*, May 2024, pp.16-20.

We note that SA Power Networks’ proposed forecast energy consumption adopts a few adjustments to AEMO’s forecast energy consumption, noting it forecasts a small increase in operational consumption and a material increase in energy met by rooftop solar PV.³⁶ We note this does not deviate significantly from the AEMO source, and reflects increase in solar PV generation as well as exhibiting a relatively flat operational energy over 2025–30.

Figure 1.4 shows SA Power Networks’ indicative distribution price path over the period from 2020–21 to 2029–30 in real 2024–25 dollar terms based on the expected revenues established in our draft decision compared to SA Power Networks’ proposed revenue requirement. The indicative price path is estimated using the approved expected revenue and dividing by forecast energy consumption for each year of the 2020–25 period.

Figure 1.4 Indicative distribution price path for SA Power Networks (\$/MWh, 2024–25)



Source: AER analysis.

We estimate that our draft decision on SA Power Networks’ annual expected revenue will result in an decrease to average distribution charges by about 1.6% per annum over the 2025–30 period in real 2024–25 dollar terms.³⁷ This compares to the real average decrease of approximately 1.0% per annum proposed by SA Power Networks over the 2025–30

³⁶ SA Power Networks, *Response to AER information request #035*, 20 August 2024, p.5

³⁷ In nominal terms, we estimate average distribution charges to increase by 1.2% per annum. This amount reflects an expected inflation rate of 2.85% per annum as determined in this draft decision.

period.³⁸ These high-level estimates reflect the aggregate change across the entire network and do not reflect the particular tariff components for specific end users.

Table 1.5 displays in nominal terms the comparison of the revenue and price impacts of SA Power Networks’ proposal and our draft decision.

Table 1.5 Comparison of revenue and price impact of SA Power Networks’ proposal and the AER’s draft decision (\$ nominal)

	2024–25	2025–26	2026–27	2027–28	2028–29	2029–30
AER draft decision						
Revenue (\$m, nominal)	887.6	939.8	976.3	1,006.6	1,102.1	1,118.8
Price path (\$/MWh) ^a	85.19	85.71	85.35	85.94	91.33	90.64
Revenue (change %)	–	5.9%	3.9%	3.1%	9.5%	1.5%
Price path (change %)	–	0.6%	–0.4%	0.7%	6.3%	–0.8%
SA Power Networks proposal						
Revenue (\$m, nominal)	884.0	952.0	980.6	1,010.0	1,097.0	1,124.4
Price path (\$/MWh) ^a	84.85	86.82	85.73	86.23	90.92	91.10
Revenue (change %)	–	7.7%	3.0%	3.0%	8.6%	2.5%
Price path (change %)	–	2.3%	–1.3%	0.6%	5.4%	0.2%

Source: AER analysis; SA Power Networks, *1.1-Post Tax Revenue Model*, January 2024.

(a) The price path is in nominal terms and is constructed by dividing nominal expected revenue for SCS by forecast energy consumption for each year of the period.

1.4.4 Expected impact of draft decision on electricity bills

The annual electricity bill for customers in SA Power Networks’ network reflects the combined cost of all the electricity supply chain components—wholesale energy generation, transmission, distribution, metering, and retail costs. This draft decision primarily relates to the distribution charges for SA Power Networks’ SCS, which represent on average approximately 27.5% of residential customers’ annual electricity bills and 27.4% of small business customers’ annual electricity bills in SA Power Networks’ network area.³⁹

We estimate the expected bill impact by varying the distributions charges in accordance with our draft decision in this attachment, while holding all other components—including the metering component—constant.⁴⁰ This approach isolates the effect of our draft decision on

³⁸ In nominal terms SA Power Networks’ proposal would increase distribution charges by 1.4% per annum. This amount reflects an expected inflation rate of 2.5% per annum as proposed by SA Power Networks in its proposal.

³⁹ AER analysis; SA Power Networks, *2024-25 annual SCS pricing model*, 19 April 2024; AER, *Revised final determination – Default Market Offer Prices 2024–2025*, June 2024, p. 6.

⁴⁰ We also have not factored in any changes arising from incentive scheme amounts, cost pass throughs or unders/overs reconciliation that usually occur in the annual pricing process to come up with the total allowed revenue.

the core distribution charges only for SA Power Networks. However, this does not imply that other components will remain unchanged across the period.⁴¹

Based on this approach, we expect that our draft decision on the distribution component will increase the average annual residential electricity bill in 2029–30 by about \$39 (\$ nominal) or 1.8% from the 2024–25 total bill level. By comparison, had we accepted SA Power Networks' proposal, the expected change in the distribution component would increase the average annual residential electricity bill in 2029–30 by about \$45 (\$ nominal) or 2.0% from the 2024–25 total bill level.

Similarly, we expect that our draft decision will result in the distribution component of the average annual electricity bill for a small business customer in 2029–30 to increase by about \$94 (\$ nominal) or 1.8% from the 2024–25 total bill level. By comparison, had we accepted SA Power Networks' proposal, the expected change in the distribution component would increase the average annual small business electricity bill in 2029–30 by about \$108 (\$ nominal) or 2.0% from the 2024–25 total bill level.

Our estimated bill impact is based on the typical annual electricity usage of 4,000 kWh and 10,000 kWh for residential and small business customers in SA Power Networks' network, respectively.⁴² Therefore, customers with different usage will experience different changes in their bills. We also note that there are other factors, such as metering, wholesale and retail costs, which affect electricity bills.

Table 1.6 shows the estimated impact of our draft decision and SA Power Networks' proposal on the average annual electricity bills for residential and small business customers in its network over the 2025–30 period.

⁴¹ It also assumes that actual energy consumption will equal the forecast adopted in our draft decision. Since SA Power Networks operates under a revenue cap, changes in energy consumption will also affect annual electricity bills across the 2025–30 period.

⁴² AER, *Revised final determination – Default Market Offer Prices 2024–2025*, June 2024, p. 6.

Table 1.6 Estimated impact of SA Power Networks’ proposal and AER’s draft decision on annual electricity bills for the 2025–30 period (\$ nominal)

	2024–25	2025–26	2026–27	2027–28	2028–29	2029–30
AER draft decision						
Residential annual electricity bill	2,230 ^a	2,234	2,231	2,235	2,274	2,269
Annual change ^b	–	4 (0.2%)	–3 (–0.1%)	4 (0.2%)	39 (1.7%)	–5 (–0.2%)
Small business annual electricity bill	5,352 ^a	5,361	5,355	5,365	5,458	5,446
Annual change ^b	–	9 (0.2%)	–6 (–0.1%)	10 (0.2%)	93 (1.7%)	–12 (–0.2%)
SA Power Networks proposal						
Residential annual electricity bill	2,230 ^a	2,244	2,236	2,240	2,274	2,275
Annual change ^b	–	14 (0.6%)	–8 (–0.4%)	4 (0.2%)	34 (1.5%)	1 (0.1%)
Small business annual electricity bill	5,352 ^a	5,386	5,367	5,376	5,457	5,460
Annual change ^b	–	34 (0.6%)	–19 (–0.4%)	9 (0.2%)	81 (1.5%)	3 (0.1%)

Source: AER analysis; SA Power Networks, *2024-25 annual SCS pricing model*, 19 April 2024; AER, *Revised final determination – Default Market Offer Prices 2024–2025*, June 2024, p. 6.

- (a) AER, *Revised final determination – Default Market Offer Prices 2024–2025*, June 2024, p. 6;
(b) Annual change amounts and percentages are indicative. They are derived by varying the distribution component of the 2024–25 bill amounts in proportion to yearly expected revenue divided by forecast energy as provided by SA Power Networks. Actual bill impacts will vary depending on electricity consumption and tariff class.

As noted in section 1.4.1, we have applied a larger increase in revenue for 2028–29 to account for the cessation of Solar Feed-in Tariff Scheme consistent with SA Power Networks’ proposed revenue smoothing approach. This has resulted in a larger increase in the annual bill in 2028–29 compared to the bill impact in other years as shown in Table 1.6 . However, we expect that this increase will be offset by the anticipated reduction to the network component of annual electricity bills once the Solar Feed-in Tariff Scheme is expired, which is estimated to be around \$46 for a typical residential customer.

SACOSS noted that SA Power Networks’ bill impact analysis is based on the electricity usage of an average customer. This may underrepresent the bill impact on customers who do not have access to renewable technologies such as solar PV. We acknowledge that customers without access to solar PV are likely to have higher electricity usage compared to customers who have access to such technology. Therefore, we have provided an estimated bill impact for a residential customer without solar PV. Based on an annual electricity usage of 4,592kWh and an annual bill of \$2,442 for a non-solar residential customer,⁴³ we expect

⁴³ AER analysis; SA Power Networks, *Attachment 18–Tariff Structure Statement Part B-explanatory statement*, January 2024, p. 58.

that our draft decision will increase the distribution component of the average electricity bill in 2029–30 by about \$43 (\$nominal) or 1.8% from the 2024–25 total bill level.

Shortened forms

Term	Definition
AER	Australian Energy Regulator
ARR	annual revenue requirement
capex	capital expenditure
CESS	capital expenditure sharing scheme
CPI	consumer price index
DMIAM	demand management innovation allowance mechanism
DMO	default market offer
EBSS	efficiency benefit sharing scheme
NER	National Electricity Rules
NPV	net present value
opex	operating expenditure
PTRM	post-tax revenue model
RAB	regulatory asset base
RFM	roll forward model
SCS	standard control services