Jemena Electricity Networks (Vic) Ltd

2026-31 Electricity Distribution Price Review
Regulatory Information Notice Response

Attachment 3

Written RIN response

Jemena
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Abbreviations

EDPR	Electricity Distribution Price Review
2026 proposal	JEN's 2026-31 Regulatory Proposal
AER	Australian Energy Regulator
AMA	Asset Management Agreement
Capex	Capital expenditure
CESS	Capital Expenditure Sharing Scheme
2021-25 period	The 2021-26 regulatory control period
2026-31 period	The 2026-31 regulatory control period
EBSS	Efficiency Benefit Sharing Scheme
Forthcoming regulatory control period	The 2026-31 regulatory control period
JAM	Jemena Asset Management Pty Ltd
JEN	Jemena Electricity Networks (VIC) Ltd
NEL	National Electricity Law
Opex	Operating expenditure
PTRM	Post-tax revenue model
RFM	Roll-forward model
RIN	Regulatory Information Notice
SGID	State Grid International Development Ltd
SGIDAIC	State Grid International Development Australian Investment Company Ltd
SGSPAA	SGSP (Australia) Assets Pty Ltd
SOCI	Security of Critical Infrastructure Act 2018
SP Group	Singapore Power Ltd
SPI	Singapore Power International Pte Ltd
Zinfra	Zinfra Pty Ltd

Overview

Jemena Electricity Networks (Vic) Ltd. (**JEN, Jemena Electricity**) is required to respond to a 2026-31 Electricity Distribution Price Review (**EDPR**) Regulatory Information Notice (**RIN**), providing information relating to the 2015 to 2031 regulatory years. The Australian Energy Regulator (**AER**) served the RIN on JEN under the National Electricity Law (**NEL**) on [17 October 2024].

This document, and its associated attachments, set out JEN's EDPR RIN response. This document is structured to mirror the structure of the RIN.

JEN's EDPR RIN response documents and templates are included as RIN Attachments 1 to 11 (as shown in Table OV—1.1). RIN Attachment 2 contains a document index which lists all of the additional supporting documents to JEN's EDPR RIN response.

Table OV–1.1: EDPR RIN Attachments

	RIN Attachments
Attachment 1	JEN - RIN - 2026-31 Price Reset submission - cover letter - 20250131
Attachment 2	JEN - RIN 2 - Document Index - 20250131
Attachment 3	JEN - RIN 3 - 2026-31 Written RIN response - 20250131
Attachment 4	JEN - RIN 4 - Basis of preparation - 20250131
Attachment 5	JEN - RIN 5 - Workbook 1 - Forecast - 20250131
Attachment 6	JEN - RIN 6 - Workbook 2 - Historical - 20250131
Attachment 7	JEN - RIN 7 - Workbook 3 - EBSS - 20250131
Attachment 8	JEN - RIN 8 - Workbook 4 - CESS - 20250131
Attachment 9	JEN - RIN 9 - Workbook 5 - Bill Impacts - 20250131
Attachment 10	JEN - RIN 10 - Claims for confidentiality - 20250131
Attachment 11	JEN - RIN 11 - Statutory declaration - 20250117
Supporting documents are listed in the document index (Attachment 2)	Includes policies, strategies, contracts, models, options analyses, and plans. Document names either start with the relevant clause under which they are provided or include the word 'Support'.

This EDPR RIN response should be read in conjunction with JEN's 2026-31 EDPR Regulatory Proposal. JEN's 2026-31 Regulatory Proposal consists of the JEN 2026-31 Proposal document and associated attachments. All the documents making up JEN's 2026-31 Regulatory Proposal are set out in *JEN - Att 01-01 Document map - 20250131* of the 2026-31 Regulatory Proposal and in Attachment 2 Document Index, which also provides a file name matrix. Where relevant, the document cross refers to the 2026-31 Regulatory Proposal.

1. Regulatory information notice framework

Requirement		Response
1.1	**Addressee of this notice**	
1.1.1	*Jemena Electricity Networks (VIC) Limited (ABN 82 064 651 083),* is a regulated network service provider for the purposes of section 28D of the *National Electricity (Victoria) Law (NEL)*.	Noted.
1.1.2	This Regulatory Information Notice (notice) is issued to *Jemena Electricity* under Part 3, Division 4 of the *NEL*.	Noted.
1.2	**Reasons for issuing this notice**	
1.2.1	The Australian Energy Regulator (*AER)* considers it is reasonably necessary for the performance or exercise of its functions and powers under the *NEL* for *Jemena Electricity* to provide, prepare and maintain information in the manner and form specified in this *notice*.	Noted.
1.2.2	The functions and powers of the *AER* are specified under section 15 of the *NEL*. These include: • monitoring regulated network service providers' compliance with network revenue or pricing determinations; • preparing and publishing reports on regulated network service providers' financial and operational performance; and • economic regulatory functions or powers including the making of a *distribution determination*[1].	Noted.
1.2.3	In order to make the *distribution determination* for *Jemena Electricity* for the *forthcoming regulatory control period* commencing on 1 July 2026 and ending on 30 June 2031, the *AER* is required to make the constituent decisions set out in rule 6.12.1 of the *National Electricity Rules (NER)* and, pursuant to rule 6.12.2, state the reasons for its decisions.	Noted.
1.2.4	Under rule 6.27 of the *NER*, the *AER* must prepare and publish an annual benchmarking report to describe the relative efficiency of each Distribution Network Service Provider (DNSP) in providing *direct control services* over a 12 month period. Further, under rules 6.5.6 and 6.5.7 of the *NER*, the AER must have regard to benchmark *operating expenditure (opex)* and benchmark *capital expenditure (capex)* when assessing these types of expenditure.	Noted.

1 The AER's powers to make distribution determinations are set out in rule 6.2.4 of the NER.

Requirement		Response
1.2.5	In addition, section 16 of the *NEL* requires the *AER* to perform its functions in a manner that will or is likely to contribute to the achievement of the National Electricity Objective (*NEO*). Section 16 of the *NEL* also requires that, when exercising discretion in making those parts of a distribution determination relating to *direct control services*, the *AER* must take into account the revenue and pricing principles.	Noted.
1.2.6	Accordingly, the *AER* requires detailed information relating to *Jemena Electricity* and its regulated electricity *network services* to make a distribution determination, monitor *Jemena Electricity's* capital, operating expenditures, network reliability performance and customer service, conduct benchmarking, and to inform the next *distribution determination*.	Noted.
1.2.7	In order to: (a) properly judge and determine each of the constituent decisions required for *Jemena Electricity's* distribution determination, (b) properly assess *Jemena Electricity's regulatory proposal*, (c) assess regulatory applications by other network service providers (including, without limitation, by performing benchmarking activities), (d) perform the tasks above in a manner that seeks to achieve the *NEO*, and (regarding the regulation of *Jemena Electricity's direct control services*) exercise its discretion taking into account the revenue and pricing principles, and (e) perform tasks incidental or connected to the tasks described in paragraphs (a) to (c) above, the *AER* needs to obtain detailed information relating to *Jemena Electricity* and its relevant activities. However, much of the information required is held only by *Jemena Electricity* and is not publicly available.	Noted.
1.2.8	The *AER* considers the information it requires in response to this *notice* is necessary to enable it to make the assessments and judgments in paragraphs 1.2.7 (a), (b) and (c) above, in a manner that accords with paragraph 1.2.7 (d) above.	Noted.
1.2.9	The *AER* considers the information that receives in response to this *notice* will enable it to perform its functions and powers under section 15 of the *NEL* and contribute to the achievement of the *NEO*.	Noted.
1.3	**Responding to this notice**	
Notice response date		Noted.

Requirement	Response
1.3.1 All information which is required to be provided in response to this *notice* is to be delivered to the *AER* electronically via the *AER's* secure file transfer service (or such other method as reasonably specified by the *AER*), on or before 31 January 2025.	
1.3.2 Information which is required to be provided in response to section 4.4.4 and 4.4.5 of this *notice*, must also be provided on or before the date *a revised regulatory proposal* is submitted to the *AER*, or if *Jemena Electricity* does not submit a *revised regulatory proposal*, 30 November 2025.	Noted.
Information to be provided to the AER 1.3.3 ***Jemena Electricity*** is required to provide the following information to the *AER*: (a) The information specified in section 3 of this *notice* (b) The information specified in section 4 of this *notice* (c) A *basis of preparation* which meets the requirements set out in section 5 of this *notice* (d) Audit reports and/or assurance reports which meet the requirements set out in section 6.1 of this *notice* (e) A statutory declaration which meets the requirements set out in section 6.2 of this *notice*.	This document explains where in JEN's 2026-31 Regulatory Proposal, the information specified in section 3 and 4 of the notice can be found. The basis of preparation is contained in *JEN - RIN 4 - Basis of preparation - 20250128* Audit report – see our response to section 6.1 below. The statutory declaration is contained in *JEN - RIN 11 - Statutory declaration - 20250128.*
1.4 Structure of this notice	
This notice is structured as follows: • Section 2 sets out the general requirements which apply under this *notice*. • Section 3 identifies the information required to be reported in the *regulatory templates*. • Section 4 identifies the *supporting information* required. • Section 5 identifies the *supporting information* required in the *basis of preparation*. • Section 6 identifies the *supporting information* required in the assurance requirements which apply under this *notice*. • Section 7 sets out information around the interpretation and definitions which apply to this *notice*. • Appendix A contains the *regulatory templates Jemena Electricity* must complete and the *regulatory template* instructions. • Appendix B contains the definitions which apply under this *notice*.	Noted.

Requirement		Response
1.5	**Authorisation for this notice**	
	DATED: 17 October 2024  Kris Funston (as delegate) Executive General Manager, Network Regulation	Noted.

2. General requirements

Requirement		Response
2.1	**Preparation of information provided to the AER**	
2.1.1	Prepare all information required under this notice in a manner and form that is in accordance with the requirements which: (a) is in an electronic format; (b) where relevant, includes any underlying calculations and formulae; (c) is not password protected; (d) does not contain any hidden information; (e) where relevant, allows for precedents and dependants to be traced; (f) for written documents, is fully searchable, in text readable format and is capable of text selection and a 'copy and paste' function being applied to it (all document files must be provided in Microsoft Word or PDF); (g) for information provided in the *regulatory templates* must be provided in the workbooks attached to this *notice*; and (h) is readily available for inspection by, or submission to, the *AER*.	The information required under this notice has been provided in accordance with the requirements.
2.2	**Maintaining information provided under this notice**	
2.2.1	*Jemena Electricity* must maintain all information prepared under this notice for a period of seven years from the date the information is submitted to the *AER*. Note: This requirement refers to the information as submitted, as well as policies, assumptions, or other information used to support the derivation of material presented in response to the *notice*. It is not intended to refer to IT systems and tools that may have been used to store information.	Noted.
2.3	**Security of critical infrastructure**	
2.3.1	If ***Jemena Electricity*** identifies any information provided in response to this *notice as protected (SOCI) information* (as defined in the Security of Critical Infrastructure Act), the "entity" being, ***Jemena Electricity*** must: (a) ensure the use and disclosure of the *protected (SOCI) information* relates to the actions of an *entity* prescribed under section 5 of the *SOCI Act*. (b) Ensure the protected (SOCI) information is identified by: (i) Naming the file or document in which the *protected (SOCI) information* is reported with the suffix "Protected-SOCI";	(a) Refer to *JEN - RIN - 2.3.1 Protected claims in 2026-31 reset RIN – 20250131* for reset RIN and *JEN - Att 12-03 Protected claims in JEN proposal - 20250131* for JEN's SOCI protected information claims. (b) The impacted documents are provided with JEN's 2026-31 Regulatory Proposal, identified by the 'Protected - SOCI' suffix. (c) and (d) Refer to *JEN - RIN - 2.3.1 Protected claims in 2026-31 reset RIN – 20250131* for reset RIN and *JEN - Att 12-03 Protected claims in JEN proposal - 20250131* for JEN's SOCI protected information claims.

	(ii) Identifying the specific information within the file or document that is *protected (SOCI) information* by shading the relevant data or other information (suggested shading colour: blue #25C6FF). (c) Provide the *AER* with a list of files or documents containing protected *(SOCI)* information. (d) Provide the *AER* with a version of each file or document listed in response to section 2.3.1(c) from which *protected (SOCI) information* has been redacted. This version of the file or document must be named in accordance with the instructions at section 4.2.1(e) of this *notice*, and listed in the table provided in response to section 4.2.1(d) of this *notice*.	
2.4	**Confidentiality claims**	
2.4.1	If *Jemena Electricity* makes a claim for confidentiality over any information provided in response to this notice it must: (a) comply with the requirements of *AER's* Confidentiality Guideline (2017), as if it extended and applied to responses to this *notice* (b) provide, in addition to a confidential version of any information, a version of the information that may be published by the *AER*, and (c) highlight all information that is subject to a confidentiality claim, and if that information is being reported in a *regulatory template* it must be highlighted using the confidentiality macro in the *regulatory template*.	JEN has made claims for confidentiality of information submitted as part of this RIN response and as part of its 2026-31 Regulatory Proposal. The claims for confidentiality have been made using the AER's Confidentiality Guideline (2017) and for RIN attachments and supporting documents are attached to this RIN response (*JEN - RIN 10 - Claims for confidentiality – 20250131*) and for claims in the 2026-31 Regulatory Proposal and attachments, (*JEN - Att 12-02 2026-31 Price Reset Claims for Confidentiality – 20250131)*
2.5	**Resubmission of information provided under this notice**	
2.5.1	If *Jemena Electricity* is required to resubmit information provided under this *notice*, it must: (a) identify the information which is to be resubmitted (b) provide the reason for the resubmission, and (c) advise as to whether or not the resubmitted information results in a material change in *Jemena Electricity's* response to the notice.	Noted.
2.5.2	If the *AER* accepts the resubmitted information, *Jemena Electricity* must update the relevant information in accordance with the notice, or as directed by the *AER*.	Noted.
2.5.3	If *Jemena Electricity* resubmits information which results in a material change to its response to this notice, the *AER* may request that *Jemena Electricity* provide assurance over this information by: (a) verifying the resubmitted information by way of a statutory declaration in accordance with section 6.2 of this notice; and	Noted.

	(b) providing the necessary audit report and the assurance report as applicable for the resubmitted information, prepared in accordance with the requirements set out in section 6.1 of this notice.	
2.6	**Regulatory control periods**	
2.6.1	The current regulatory control period is the regulatory control period that commenced on 1 July 2021 and ends on 30 June 2026.	Noted.
2.6.2	The forthcoming regulatory control period is the regulatory control period that commences on 1 July 2026.	Noted.
2.6.3	Previous regulatory control periods are those that ended before the current regulatory control period commenced.	Noted.

3. Regulatory template requirements

Requirement		Response
3.1	**Requirement to provide regulatory templates**	
3.1.1	*Jemena Electricity* must prepare and provide the *AER* with the information required in the *regulatory templates* 1 to 7 attached in Appendix A. The *regulatory templates* are listed below: 1. Vic DNSP *2026-31 – Reset RIN – Workbook 1 – Forecast* ***(Workbook 1 – Forecast)*** 2. Vic DNSP *2026-31 – Reset RIN – Workbook 2 – Historical* ***(Workbook 2 – historical)*** 3. Vic DNSP *2026-31 – Reset RIN – Workbook 3 - Efficiency Benefit Sharing Scheme* **(*Workbook 3 – EBSS*)** 4. Vic DNSP *2026-31 – Reset RIN – Workbook 4 - Capital Expenditure Sharing Scheme* **(*Workbook 4 – CESS*)** 5. Vic DNSP *2026-31 – Reset RIN – Workbook 5 - Bill Impacts (**Workbook 5 – Bill Impacts**)* 6. Vic DNSP *2026-31 – Reset RIN – Workbook 6 - Recast category analysis* ***(Workbook 6 – Recast category analysis)*** 7. Vic DNSP *2026-31 – Reset RIN – Workbook 7 - Recast economic benchmarking* ***(Workbook 7 – Recast economic benchmarking)*** 8. Vic DNSP *2026-31 – Reset RIN – OPTIONAL 5.4 Maximum demand (**Workbook 8 – Optional demand**)*	JEN has prepared and provided the AER with the information required in the regulatory templates. Refer to: • *JEN - RIN 5 - Workbook 1 - Forecast – 20250131* • *JEN - RIN 6 - Workbook 2 - Historical – 20250131* • *JEN - RIN 7 - Workbook 3 - EBSS – 20250131* • *JEN - RIN 8 - Workbook 4 - CESS – 20250131* • *JEN - RIN 9 - Workbook 5 - Bill Impacts – 20250131*
3.1.2	*Jemena Electricity* must complete the regulatory templates in accordance with the instructions set out: (a) in each *regulatory template*, and (b) in the document attached at Appendix A titled '*Jemena Electricity Networks 2026-31 – Regulatory information notice – Appendix A – Regulatory template instructions* (***Regulatory template instructions***)'.	JEN has completed the regulatory templates according to the instructions.
3.1.3	The information required in each *regulatory template* in *Workbook 1 – Forecast*, *Workbook 2 – historical* and *Workbook 5 – Bill Impacts*, is to be completed in accordance with:	JEN has completed the regulatory templates according to the instructions.

Requirement		Response
	(a) the service classifications set out in the *framework and approach paper*[2] for the *forthcoming regulatory control period*, and (b) *Jemena Electricity's cost allocation method* for the *forthcoming regulatory control period*.	
3.1.4	The information required in each *regulatory template* in *Workbook 3 – EBSS*, and *Workbook 4 – CESS*, is to be completed in accordance with: (a) the service classifications that applied in each *regulatory year*; and (b) *Jemena Electricity's cost allocation method* that applied in each *regulatory year*.	JEN has completed the regulatory templates according to the instructions.
3.1.5	If: (a) *Jemena Electricity's cost allocation method* has changed during the *current regulatory control period*, or (b) *Jemena Electricity's* service classifications have changed from the *current regulatory control period*, or (c) *Jemena Electricity* proposes to vary the service classifications set out in the relevant *framework and approach paper*, or (d) *Jemena Electricity* proposes to change its *cost allocation method* for the *forthcoming regulatory control period*; such that there would be *material* changes to information previously submitted to the *AER*, *Jemena Electricity* must revise historical information previously submitted to the *AER* under either the annual Category Analysis or the Economic Benchmarking RIN.	JEN has not made changes to its cost allocation method. JEN proposes minor changes to the service classification in the forthcoming regulatory period—relative to those services classified in the current regulatory control period (refer to *JEN - Att 04-01 Classification of services)*—however, the changes are not considered material. JEN does not propose to vary its service classification in the forthcoming regulatory control period relative to those services classified in the relevant framework and approach paper.[3] JEN does not propose changes to its cost allocation method.
3.1.6	*Jemena Electricity* must report information revised in accordance with paragraph 3.1.5 (revised information) in *Workbook 6 – Recast category analysis* and *Workbook 7 – Recast economic benchmarking*: (a) where revised information in one table causes a change to information in another table, regardless of whether that other change is a *material* change, report that change in the relevant table; and (b) when reporting any change in any table in a *regulatory template*, include within that table all information that remains unchanged from that previously reported to the *AER*.	JEN has not revised information.
3.1.7	*Jemena Electricity may choose to report information in Workbook 8 – Optional demand, but is not required to do so. Instructions on using Workbook 8 –*	JEN has chosen not to report information in Workbook 8.

[2] AER, *Final framework and approach for Ausnet Services, Citipower, Jemena Electricity, Powercor and United Energy for the regulatory control period 2026-31*, July 2024.

[3] AER, *Final framework and approach for Ausnet Services, Citipower, Jemena Electricity, Powercor and United Energy for the regulatory control period 2026-31*, July 2024.

Requirement	Response
Optional demand are set out at section 5 of Appendix A- Instructions. Consistent with the instructions in section 5 of *Appendix A – Instructions,* maximum demand data is only required to be reported once. If information is provided in *Workbook 8 – Optional demand,Jemena Electricity is not required to report information in* ***Workbook 1 – Forecast*** *- Table 5.4.1 – Non-coincident and coincident Maximum Demand.*	

4. Supporting information requirements

Requirement		Response
4.1	**Requirement to provide supporting information under this notice**	
4.1.1	*Jemena Electricity* must prepare and provide the *AER* with the *supporting information* set out in sections 4, 5 and 6 of this *notice*.	Noted.
4.2	**Information used for the purposes of preparing the regulatory proposal**	
Consultant reports, material assumptions 4.2.1	Provide information used for the purposes of preparing the *regulatory proposal* including: (a) all consultants' reports commissioned and relied upon in whole or in part; (b) all *material* assumptions relied upon; (c) a table that references each response to this section 4 and where it is provided in or as part of the *regulatory proposal*; (d) a table that references each document provided in or as part of the regulatory proposal and its relationship to other documents provided, excluding documents listed in response to section 2.3.1(c); and (e) each document identified in the table referred to in (d) above must be given a meaningful filename in the form: ***Jemena Electricity* – [Author] – [title] – [date] – [public/confidential], where:** (i) **Author** is the author of the file if not *Jemena Electricity* (NSW) for example a consultant or other third party; (ii) **Title** provides a meaningful description of the content of document, with limited reliance on acronyms or cross references, for example "Appendix 1A" is not	JEN's 2026-31 Regulatory Proposal includes: (a) All consultants' reports relied upon to prepare the 2026-31 Regulatory Proposal listed in *JEN - Att 01-01 Document map – 20250131* and *JEN - RIN 2 - Document Index – 20250131* (b) Material assumption relied upon to prepare the 2026-31 Regulatory Proposal can be found in *JEN - RIN - 4.2.2 Material assumptions – 20250131* and is mentioned in clause 4.2.2 below (c) This document provides a reference to each response to section 4 and where it is provided as part of the 2026-31 Regulatory Proposal (d) A table is provided in *JEN - RIN 2 - Document Index – 20250131* that references each document provided in or as part of the 2026-31 Regulatory Proposal and does not include reference to protected claims (e) The document naming convention described has been followed for all documents identified in *JEN - RIN 2 - Document Index – 20250131* with *JEN* adopted rather than *Jemena Electricity* as the prefix for each document.

Requirement		Response
	meaningful, but “Appendix 1A – Cost allocation method” is; (iii) **Date** is a relevant date associated with the file, generally the date the document was created; (iv) **Public/confidential** identifies if the file in its entirety can be published (public); or if it contains any information which is the subject of a claim for confidentiality in accordance with this notice (confidential).	
4.2.2	For each *material* assumption identified above provide: (a) its source or basis; (b) if applicable, its quantum; (c) whether and how the assumption has been applied and was taken into account; and (d) the effect or impact of the assumption on the *capital expenditure* and *operating expenditure* forecasts in the forthcoming *regulatory control period* taking into account: (i) the actual expenditure incurred during the current *regulatory control period*; and (ii) the sensitivity of the forecast expenditure to the assumption.	4.2.1 (b) above refers to the standard control services *JEN - RIN - 4.2.2 Material assumptions – 20250131* which lists JEN’s material assumptions, the source or basis of the assumption, the quantum where applicable and how the assumption has been applied. In response to (d), the 2026-31 Regulatory Proposal references below outline the effect or impact of the assumptions on the operating and capital expenditure forecasts: *JEN - Att 05-01 Capital expenditure – 20250131* *JEN - Att 05-10M SCS Capex model – 20250131* *JEN - Att 06-01 Operating expenditure – 20200131* *JEN - Att 06-03M SCS opex model - 20250131*
4.2.3	Provide reconciliation of the *capital expenditure* and *operating expenditure* forecasts provided in the *regulatory templates* to the proposed capital and operating allowances in the *post-tax revenue* model for the *forthcoming regulatory control period.*	Reconciliation of the standard control services capital expenditure and operating expenditure forecasts provided in the regulatory templates to the proposed allowances in the PTRM are provided in the following models: • Capital and operating expenditure reconciliation to the PTRM is provided in *JEN - RIN 4.2.3 RIN Reconciliation model – Expenditure - 20250131*
4.2.4	Where the *regulatory proposal* varies or departs from the application of any component or parameter of the *capital expenditure sharing scheme*, *efficiency benefit sharing scheme*, *demand management incentive scheme* or *service target performance incentive scheme* as set out in the *framework and approach paper*, for each variation or departure explain: (a) the reasons for variation or departure, including why it is appropriate;	JEN’s 2026-31 regulatory proposal *does not* vary or depart from the application of any component or parameter of the *capital expenditure sharing scheme*, *efficiency benefit sharing scheme*, *demand management incentive scheme* or *service target performance incentive scheme* as set out in the *framework and approach paper*

Requirement	Response
(b) how the variation or departure aligns with the objectives of the relevant scheme; and (c) how the proposed variation or departure will impact the operation of the relevant scheme.	
Models 4.2.5 Provide the models *Jemena Electricity* has used to: (a) develop its total forecast *capex*; (b) derive and apply the materials price changes, including any model(s) developed by a third party; (c) develop total forecast *opex*. (d) develop proposed charges for *public lighting services* in the *forthcoming regulatory control period*; (e) forecast new *connection services* and *maximum demand*; (f) calculate the *long run marginal cost* estimates in *Jemena Electricity*'s proposed *tariff structure statement*; (g) develop proposed charges for *metering services* (the *AER's* Standardised metering capex and opex model[4]; and the Standardised metering pricing model[5]); and (h) develop proposed charges for *ancillary network services* (the *AER's* Standardised ancillary network services model[6]).	For 4.2.5 (a), refer to *JEN - Att 05-10M – SCS Capex model - 20250131*. The capex forecasting methodology is summarised in *JEN - Att 05-01- Capital expenditure - 20250131*. For 4.2.5 (b), JEN has applied zero real escalation on materials, consistent with the AER's standard approach. For 4.2.5 (c), refer to *JEN - Att 06-03M – SCS Opex model - 20250131*. The opex forecasting methodology is summarised in *JEN - Att 06-01 – Operating expenditure - 20250131* and *JEN - Att 06-04 – Operating expenditure step changes - 20250131* of our 2026-31 Regulatory Proposal. For 4.2.5 (d), refer to *JEN – Att 11-05M ACS Public lighting model – 20250131* and *JEN – Att 11-06M ACS Public lighting inputs model – 20250131.* The approach and charging methodology is explained in *JEN - Att 11-02 Public lighting services – 20250131.* For 4.2.5 (e), refer to *JEN - RIN - 4.4.1 -Connections Capex Forecast Summary Report* *JEN -Blunomy - RIN - Support - Spatial Level Maximum Demand Forecast Methodology* *JEN - RIN - 4.4.1 - CIC Model - 20250131 – Confidential* *JEN - RIN - Support – Connection Capex Forecast Summary Report - 20250131 – Confidential* *JEN - RIN - Support - Customer Connections Forecast Methodology - 20250131 – Confidential* *JEN – RIN – Support – Customer Connections Forecast Summary Report – 20250131 – Confidential* *JEN - RIN - Support – JEN Load Forecast Methodology - 20250131 – Public* *JEN - RIN - Support - Major Customers Forecast Methodology - 20250131* For 4.2.5 (f), refer to *JEN - Oakley Greenwood - Att 09-03 Long run marginal cost model – 20241111.* For 4.2.5 (g), refer to *JEN – Att 10-03M ACS Metering opex and capex model – 20250131.* *JEN - Att 10-01A Appendix B Metering unit rate model - 20250131* *JEN – Att 10-06M ACS Metering exit fees model – 20250131*

4 AER, Standardised Metering Capex and Opex Model – 31 March 2022, at AER website: aer-standardised-metering-capex-and-opex-model

5 AER, Standardised Metering Pricing Model – 31 March 2022, at AER website: aer-standardised-metering-pricing-model

6 AER, Standardised ANS Model – 31 March 2022, at AER website: aer-standardised-ans-model

Requirement		Response
		For 4.2.4 (h), refer to *JEN – Att 11-04M ACS Fee based and quoted services model – 20250131.*
4.3	**Classification of services**	
4.3.1	If the proposed service classifications in the *regulatory proposal* depart from any of the service classifications set out in the *framework and approach paper*: (a) provide in a second set of *regulatory templates*, all information required in each *regulatory template* in accordance with the instructions contained therein, modified as necessary, to incorporate the proposed service classifications; and (b) identify and explain where the *regulatory templates* differ.	JEN's proposed services classification is outlined in *JEN - Att 04-01 Classification of services – 20250131* and does not depart from any of the service classifications set out in the *framework and approach paper.*
4.4	**Capital expenditure**	
General		Please refer to the following attachments: *JEN - Att 05-01 Capital expenditure – 20250131* *JEN - Att 05-02 Energy forecasts report – 20250131* *JEN - Att 05-03 Peak demand forecasts report- 20250131* *JEN - Att 05-04 Customer numbers – 20250131* *JEN - Houston Kemp Att 05-06 AER repex modelling – 20241220* *JEN - Oxford Economics Att 05-07 Real cost escalation report - 20241008* *JEN - Att 05-09 Connection policy – 20250131* *JEN - Att 05-10M SCS Capex model - 20250131* *JEN - RIN 2 - Document Index – 20250131* lists the supporting documents providing detail on JEN's forecast capex.
4.4.1	Provide justification for *Jemena Electricity's* total *forecast capex,* including the following information: (a) why the total *forecast capex* is required for *Jemena Electricity* to achieve each of the objectives in clause 6.5.7(a) of the *NER*; (b) how *Jemena Electricity's* total *forecast capex* reasonably reflects each of the criteria in clause 6.5.7(c) of the *NER*; (c) how *Jemena Electricity's* total *forecast capex* accounts for the factors in clause 6.5.7(e) of the *NER*; (d) an explanation of how the plans, policies, *procedures* and *regulatory obligations or requirements* identified in *Workbook 1 – Forecast, regulatory templates* 7.1 and 7.3 have been used to develop *forecast capex*; and (e) an explanation of how each response provided to paragraph 4.4.1 (a) to (d) is reflected in any increase or decrease in expenditures or	

Requirement		Response
	volumes, particularly between the *current* and *forthcoming regulatory control periods*, provided in *Workbook 1 – Forecast, regulatory templates* 2.1 to 2.11.	
4.4.2	Identify which items of *Jemena Electricity*'s forecast *capex* are: (a) derived directly from competitive tender processes; (b) based upon competitive tender processes for similar *projects*; (c) based upon estimates obtained from contractors or manufacturers; (d) based upon independent benchmarks; (e) based upon actual historical costs for similar *projects*, and (f) reflective of any amounts for risk, uncertainty or other unspecified contingency factors, and if so, how these amounts were calculated and deemed reasonable and prudent.	Refer to the supporting documents listed in *JEN - RIN 2 - Document Index - 20250131* for detailed descriptions of how costs were derived.
4.4.3	Provide all documents which were *materially* relied upon and relate to the *deliverability* of *forecast capex* and explain the proposed *deliverability*.	All supporting documents relating to forecast capex are listed in *JEN - RIN 2 - Document Index - 20250131*. For additional information on deliverability of forecast capex for ICT, please refer to Section 8 "Deliverability" and Section 9 "Governance Framework" in the supporting document *JEN - RIN – Support - Technology plan - 20250131.* For additional information on deliverability of forecast capex for Asset Management, please refer to *JEN - RIN 4.4.3 Asset Management Delivery Plan– 20250131.* For additional information on the delivery plan for metering inspections, please refer to *JEN – RIN – 4.6.1 Business Case - Inspection of metering installations – 20250131.*
Transparency		
4.4.4	For total capital expenditure expected to be incurred in the *current regulatory control period*, provide: (a) a comparison of the total expenditure, disaggregated by expenditure category or driver, to the total *forecast capex* allowed for the *current regulatory control period*; (b) an explanation of the drivers of differences noted in response to section 4.4.4 (a), for example the impact of efficiency gains, major new projects,	For 4.4.4 (a) and (b): *JEN - Att 05-01 Capital expenditure – 20250131* provides a comparison of the total forecast capital expenditure by driver, compared to total capital expenditure expected to be incurred in the current regulatory control period and an explanation for material differences. Further details on our ICT spend are provided in *JEN - RIN – Support - Technology plan – 20250131.* For 4.4.4 (c) A list of projects deferred from 2021-26 to 2026-31 is provided in the capex model: "*JEN - Att 05-10M SCS Capex model - 20250131 - Public"*

Requirement		Response
	project deferrals or rescoping, changing regulatory obligations, asset age, or other factors; (c) a list of projects deferred in the *current regulatory control* period and included in the forecast capex for the forthcoming *regulatory control period*, and the rationale for the deferral.	These projects were deferred from the current regulatory control period to the forthcoming regulatory control period due to the identification and prioritisation of other higher priority projects, including addressing other regulatory obligations such as the obligation to offer to connect customers to the distribution electricity network.
4.4.5	For forecast capex for the forthcoming regulatory control period, provide: (a) a comparison of the total forecast expenditure by category or driver to the total *capital expenditure* expected to be incurred in the *current regulatory control period*; (b) an explanation of the drivers of differences noted in response to section 4.4.5 (a), for example the impact of expected efficiency gains, major new projects, project deferrals or rescoping, changing regulatory obligations, asset age, or other factors.	Please refer to Attachment "*JEN - RIN – Support - Technology plan - 20250131*" and *"JEN - Att 05-01 Capital expenditure - 20250131*".
	NOTES: 1. The drivers and categories referred to in 4.4.4 (a) and 4.4.5 (a) must reflect the *capex* drivers or categories used by *Jemena Electricity* in its *regulatory proposal* RIN response and/or *capex* model. 2. The total *capital expenditure* expected to be incurred in the *current regulatory control period* will be comprised of actual *capital expenditure* for the years where this data is available, and planned *capital expenditure* for the remaining years of the current *regulatory control period*.	ICT value drivers are as per the AER ICT guidance note categories.[7] Please refer to "*JEN - RIN - Support - Technology plan*", Section 6 "ICT Value Drivers". Categories are: • Maintaining existing services, functionalities, capability and/or market benefits • Complying with new / altered regulatory obligations / requirements • New or expanded ICT capability, functions and services This is also contained in *JEN - Att 05-10M SCS Capex model – 20250131* for each project. 2. Noted.
Capital Categories		For ICT the expenditure categories have been adopted from the AER ICT guidance note.[8]
4.4.6	Describe each *capex category* and expenditures relating to these categories identified in the *regulatory templates*, including:	GREENFIELD AND REINFORCEMENT DRIVEN AUGEX

[7] AER, *Non-network ICT capex assessment approach*, November 2019.

[8] AER, *Non-network ICT capex assessment approach*, November 2019.

Requirement	Response
(a) key drivers for expenditure; (b) an explanation of how expenditure is distinguished between: (i) *greenfield driven* and r*einforcement driven augex*; (ii) *connections expenditure* and *augmentation capex*; (iii) *replacement capex* driven by condition and asset replacements driven by other drivers (e.g. the need for *greenfield* or *reinforcement driven augex*); and (iv) any other *capex category* or *opex category* where *Jemena Electricity* considers that there is reasonable scope for ambiguity in categorisation.	*JEN – RIN - Support – JEN Spatial Level Maximum Demand Forecasts Model 2024 – 20250131* *JEN – RIN - Support – JEN Maximum Demand Forecast Report 2024 – 20250131* *JEN – RIN - Support – 2024 Distribution Annual Planning Report – 20250131* *JEN - RIN - Support - JEN Spatial Level Maximum Demand - Forecast Procedure - 20250131* *JEN - Blunomy - RIN - Support - Spatial Level Maximum Demand Forecast Methodology - 20241122 - Confidential* CONNECTIONS AND AUGMENTATION CAPEX *JEN – RIN - Support – Connections Capex Forecast Summary Report – 20250131* *The purpose of this report is to explain JEN's CIC expenditure forecasts in the forthcoming regulatory period as one of the key drivers of its capital expenditure plans.* *JEN – RIN - Support – Customer Connections Forecast Methodology – 20250131* *JEN – RIN – Support – Customer Connections Forecast Summary Report – 20250131* *JEN – RIN – Support – 11kV Central Area Network Development Strategy – 20250131* *This document articulates the NDS and the plans for the central area of the Jemena's 11kV electricity network. The supply area is serviced by 4 sub stations by way of a network of 11kV distribution feeders. The NDS presents the current and emerging limitations within this supply area over a 10-year planning horizon, and identifies solutions to address identified network needs.* *JEN – RIN – Support – 22kV Central Area Network Development Strategy – 20250131* *This document articulates the Network Development Strategy (NDS) and plan for the central area of the Jemena's 22kV electricity network. This supply area is serviced by 3 zone substations, JEN feeders supplied from AusNet's Terminal Station and by way of network of 22kV distribution feeders. This NDS presents the current and emerging limitations within this supply area over a 10-year planning horizon and articulates the need for augmentation and other capital works in order to address the identified network needs.* *JEN – RIN – Support – North-Western Growth Corridor Network Development Strategy – 20250131* *This document articulates the NDS and plan for the north western area of the Jemena Electricity Network (JEN). This supply area is serviced by 2 zone substations by way of a network of 22 kV distribution feeders. This NDS presents the current and emerging limitations within this supply area over a 10-year planning horizon, and identifies solutions to address identified network needs.*

Requirement	Response
	JEN – RIN – Support – Northern Growth Corridor Network Development Strategy – 20250131 *This document articulates the NDS and the plans for the northern area of the Jemena's electricity network. The area is supplied by 3 zone substations and AusNet Services' by way of a network of 22 kV distribution feeders. This NDS presents the current and emerging limitations within this supply area over a 10-year planning horizon and identifies solutions to address identified network needs.* *JEN – RIN – Support – Major Customers Network Development Strategy – 20250131* *This document outlines the Network Development Strategy (NDS) and plan for major customer connections, including data centres, within the Jemena Electricity Network (JEN) service area. It identifies current and emerging limitations over a 10-year planning horizon related to connecting proposed major customers and data centres. The NDS highlights the need for network augmentation and other capital works to address these limitations.* *The strategy includes planned staging requirements for each data centre and major load connection, detailing transitions from initial 22 kV supplies to ultimate 66 kV supplies. It provides a consolidated review of augmentation works on the distribution and sub-transmission networks, aiming to optimise network capacity and deliver cost-efficient solutions for uncommitted connections.* *Additionally, the NDS considers network development synergies to accommodate multiple connections within a single area, minimising costs by evaluating a range of scenarios with varying probabilities of connection progression and ultimate capacity requirements.* *JEN – RIN – Support – Major Customers Forecast Methodology – 20250131* *This document details Jemena's method for forecasting block load maximum demands from major customers, focusing on large users connected to the 66kV network. It supports the Major Customer Network Development Strategy (NDS), which addresses network limitations and the need for augmentation to connect major customers, such as data centres, over a 10-year horizon. The methodology accounts for staging requirements and manages uncertainty in demand forecasts by considering various uptake scenarios.* *JEN – RIN – Support – Feeder Augmentation at Fairfield – Relief Capacity Constraint – Business Case– 20250131* *This document outlines the business case and strategic plan for the section of the Jemena Electricity Network (JEN) serving the suburbs of Fairfield, Alphington, and Ivanhoe. This area is supplied by the Fairfield (FF) zone substation and a network of 6.6 kV distribution feeders. It identifies current and emerging limitations within the supply area over a 10-year planning horizon and highlights the need for augmentation and capital works to address these network requirements.*

Requirement	Response
	JEN – RIN - Support – East Preston Area Network Development Strategy – 20250131 *This document provides an updated network development strategy for the Preston area, outlining supply requirements, identifying and quantifying associated risks, and evaluating mitigation options. The strategy identifies the preferred solution to address forecast supply risks and enhance safety in the area. Developed with a focus on economic assessment, the strategy compares options based on total lifecycle costs and benefits. This approach ensures JEN delivers an optimal long-term solution while maintaining value for money to customers.* REPLACEMENT CAPEX *JEN – RIN - Support – Electricity Secondary Plant Asset Class Strategy – 20250131* *Electricity Secondary Plant ACS is unpacked and divided into sub-asset classes* • *Protection & Control equipment* • *DC Supply System* • *Communications cabling* • *Multiplexers and MPLS equipment* • *Radio & Cellular* • *Remote Terminal Units and Gateways* • *Communication Network Devices* • *GPS Clocks* *Each sub-asset class is described and discussed in terms of its associated risk, performance, life cycle management and budgetary forecasts.* *JEN – RIN - Support – Electricity Primary Plant Asset Class Strategy – 20250131* *Electricity Primary Plant ACS is unpacked and divided into zone substation sub-asset classes:* • *Transformers* • *Circuit breakers* • *Disconnectors and buses* • *Instrument transformers* • *Capacitor banks* • *Buildings and grounds*

Requirement	Response
	• *Earthing systems* *Each sub-asset class is described and discussed in terms of its associated risk, performance, life cycle management and budgetary forecasts.* *JEN – RIN - Support – Electricity Distribution Asset Class Strategy – 20250131* *Electricity Distribution ACS is unpacked and divided into sub-asset classes:* • *Poles* • *Pole top structures (crossarms)* • *Conductors and connectors* • *Underground distribution systems* • *Pole type transformers* • *Non-pole type distribution substations* • *Overhead line switchgear* • *LV overhead services* • *Public lighting* • *Earthing systems* • *HV outdoor overhead fuses* • *Distribution surge arrestors* • *Automatic circuit reclosers* *Each sub-asset class is described and discussed in terms of its associated risk, performance, life cycle management and budgetary forecasts.* *JEN – RIN - Support - JEN Fleet Asset Class Strategy – 20250131* *JEN Fleet Asset Class Strategy defines the asset strategy for the specific asset class in consideration of full lifecycle costs.* *JEN – RIN - Support - JEN Property Asset Class Strategy – 20250131* *Property ACS includes information about each asset sub-class, including:* *Each sub-asset class is described and discussed in terms of:*

Requirement	Response
	• *Drivers for expenditure – the key asset management drivers that inform why and when we invest in our property assets.* • *Asset management considerations – the important factors we consider when determining when and how to invest in our property assets.* • *Asset performance – information about performance, condition, and service levels.*
Replacement capex modelling 4.4.7 In relation to information provided in *Workbook 1 – Forecast, regulatory template* 2.2 and with respect to the *AER's* repex model,[9] for individual *asset* categories in each *asset* group set out in the *regulatory templates,* provide in a separate document as description of the *asset* category, including: (a) the *assets* included and any boundary issues (i.e. with other *asset* categories); (b) an explanation of how these matters have been accounted for in determining quantities in the age profile; (c) an explanation of the main drivers for replacement (e.g. condition); and (d) an explanation of whether the replacement unit cost provides for a complete replacement of the *asset*, or some other activity, including an extension of the *asset's* life (e.g. pole staking) and whether the costs of this extension or other activity are capitalised or not.	Please refer to: *JEN – RIN – 4.4.7 – Replacement Capital Expenditure Modelling – 20250131* *JEN - Houston Kemp Att 05-06 AER repex modelling – 20241220* And *JEN - Att 05-01 Capital expenditure - 20250131*
Connections expenditure 4.4.8 Provide and describe the methodology and assumptions used to prepare the forecasts of *connection expenditure* works including: (a) Estimation of *connection services unit costs for each customer type; and* (b) *Connection services* volumes for each *customer type*.	Please refer to: *JEN – RIN – 4.4.1 - CIC Model – 20250131* *JEN – RIN - Support – Connection Capex Forecast Summary Report – 20250131* *JEN – RIN - Support - Customer Connections Forecast Methodology – 20250131* *JEN – RIN – Support – Customer Connections Forecast Summary Report – 20250131*

[9] AER repex model outline for electricity distribution determinations, February 2020, at: AER website: repex-model-outline-electricity-distribution-determinations

Requirement	Response
4.4.9 *Jemena Electricity* must provide its estimation of *customer contributions* based upon the estimated life and revenue to be recovered from connection assets, including: (a) the expected life of the *connection asset*; (b) the *average* consumption expected by the *customer* over the life of the *connection asset*; and (c) any other factors that influence the expected recovery of the *Jemena Electricity network* use of system charge to *customers*.	Please refer to: *JEN – RIN – 4.4.9 Customer Contribution Forecasting Methodology – 20250131- Public*
Non-network alternatives 4.4.10 Identify the *policies and strategies* and *procedures* in the response to *Workbook 1 – Forecast*, *regulatory template* 7.1 which relate to the selection of efficient non-network solutions.	Non-network options are considered as part of the network planning methodology described in the JEN Distribution Annual Planning Report. *JEN – RIN – Support – JEN Demand Side Engagement – 20250131*
4.4.11 Explain the extent to which the provision for efficient non-network alternatives has been considered in the development of the *forecast capex* and *forecast opex* proposals.	Non-network options have been considered as part of the JEN CER Integration Strategy (Attachment *JEN - Att 03-01 CER integration Strategy - 20250131*) and related subordinate programs. As a part of these non-network options, JEN proposes forecast opex as an efficient substitute (refer to *JEN - Att 06-04 Operating expenditure step changes - 20250131 - Public*) JEN also considers non-network options for it's large projects: *JEN - RIN - Support - JEN Spatial Level Maximum Demand Forecasts Model - 20250131* *JEN - RIN - Support – JEN Maximum Demand Forecast Report 2024 - 20250131* • *JEN – RIN – Support – JEN 2004 MD Load Forecast.xsl* • *JEN – RIN – Support – SubT_ZSS_HVFder_Export_Neutral_Forecast and Rating_2024.xsl* *JEN - RIN - Support – Connection Capex Forecast Summary Report - 20250131* *JEN - RIN - Support – Customer Connections Forecast Methodology - 20250131* *JEN – RIN – Support – Customer Connections Forecast Summary Report – 20250131* *JEN - RIN - Support – 2024 Distribution Annual Planning Report - 20250131* *JEN – RIN – Support – 11kV Central Area Network Development Strategy – 20250131* *JEN – RIN – Support – 22kV Central Area Network Development Strategy – 20250131* *JEN – RIN – Support – North-Western Growth Corridor – 20250131*

Requirement	Response
	JEN – RIN – Support – Northern Growth Corridor – 20250131 *JEN – RIN – Support – Major Customers Network Development Strategy – 20250131* *JEN – RIN – Support – Major Customers Forecast Methodology – 20250131* *JEN – RIN – Support – Feeder Augmentation at Fairfield – Relief Capacity Constraint – Business Case– 20250131* *JEN – RIN - Support – East Preston Area Network Development Strategy – 20250131* *JEN – RIN – Support – Coburg North ZSS Redevelopment – Business Case – 20250131* *JEN – RIN – Support – Coburg South ZSS Redevelopment – Business Case – 20250131* *JEN – RIN – Support – North Heidelberg ZSS Redevelopment – Business Case – 20250131*
4.4.12 Identify each non-network alternative that Jemena Electricity has: (a) commenced during the *current regulatory control period*; and (b) selected to commence during, or will continue into, the forthcoming *regulatory control period*.	JEN has implemented one non-network alternative in the current regulatory control period, and plans to continue this initiative into the forthcoming regulatory control period. This non-network alternative is explained below. In the current regulatory control period, as part of the Victorian Emergency Backstop Mechanism (VEBM) mandate being implemented by the Victorian Government by altering JEN's distribution licence through two ministerial orders, JEN has implemented three solutions in 2024 with further improvement in early 2025 to enable JEN, in response to AEMO's direction, to reduce or curtail distribution solar PV systems (DPV) at times of Minimum System Load (MSL) when there is surplus generation in the energy system. The total cost for the VEBM implementation is $13.3 million ($2021) and will be applied across JEN's supply area as required. One of the primary solutions and technologies used is the adoption of a Common Smart Inverter Profile Australia (CSIP-AUS), using a Utility Server to communicate with customers' DPV over the public internet and a Lite Distributed Energy Management System (Lite DERMS) to coordinate and dispatch the generation output from customers' DPV. Two other solutions and technologies deployed as part of VEBM are 1) "Dynamic Operating Envelop (DOE) Over SCADA" where a DOE is sent to customer's site to reduce the export energy using JEN's existing SCADA master station for DPV systems greater than 200kVA, and 2) Generation Monitoring Meter (GMM) using a dedicated Advanced Metering Infrastructure (AMI) CT meter with load contactor on the DPV circuit to trip and restore customers' DPV. GMM is an alternative method for DPV sizes 30 kVA to 200 kVA for customers without an internet connection. In the forthcoming regulatory control period, JEN plans to leverage and expand the CSIP-AUS Utility Server and Lite DERMS implemented under VEBM to provide non-network alternative, referred to as Flexible Services, to alleviate distribution network limitations and provide further benefits to our customers. This non-network alternative would likely avoid distribution substations augmentation capex of approximately $11m ($, June 2024) based on a unitised cost of $220k per substation and 50 distribution substations augmentation deferral. The total cost for the Flexible

Requirement		Response
		Services implementation over the forthcoming regulatory control period is $27.6m ($, June 2024), which will be offered to export and import customers across JEN supply area. Refer to *JEN – RIN -Support – Grid Stability and Flexible Services Program* for further details.
4.4.13	For each *non-network* alternative identified provide a description, including cost and location.	Refer to response in 4.4.12.
4.4.14	Provide for each year of the *current regulatory control period*, and for the *forthcoming regulatory control period*, details of each payment made, or expected to be made, by *Jemena Electricity* to an *embedded generator* in reflection of any costs avoided by deferring *augmentation* of: (a) *Jemena Electricity's* distribution network; or (b) the relevant transmission network	No payments have been made in the current regulatory control period to an *embedded generator* in reflection of any costs avoided by deferring *augmentation*, nor expect to be paid in the forthcoming regulatory control period of the *Jemena Electricity's* distribution network. *Jemena Electricity* is not aware of any deferred augmentation on the transmission network and therefore, is unable to report details of each payment made, or expected to be made, by *Jemena Electricity* to an *embedded generator* in reflection of any costs avoided on the relevant transmission network.
4.5	**Forecast input price changes**	
4.5.1	Provide: (a) information supporting or relied upon that explain the change in the price of goods and services purchased by *Jemena Electricity*, including evidence that any materials price forecasting method explains the price of materials previously purchased by *Jemena Electricity.*	We adopt a zero real input price escalation for non-labour costs, consistent with the AER's standard forecasting approach. Therefore, we do not have or submit any information supporting or relied upon that explain the change in the price of goods and services purchased by *Jemena Electricity*, including evidence that any materials price forecasting method explains the price of materials previously purchased by *Jemena Electricity*
4.5.2	Provide an explanation of: (a) the methodology underlying the calculation of each price change, including: (i) sources (ii) data conversions (iii) the operation of any model(s) provided under paragraph 4.2.5(b); and (iv) the use of any assumptions such as lags or productivity gains. (b) whether the same price changes have been used in developing both the *forecast capex* proposal and *forecast opex* proposal; and	For 4.5.2 (a) The methodology underlying the calculation of each price change (other than changes outlined in 4.5.1) and the accompanying models are provided in the attachments below*:* *JEN - Att 06-01 Operating expenditure – 20250131* *JEN - Att 06-03M SCS opex model – 20250131* *JEN - Oxford Economics Att 05-07 Real cost escalation report – 20241008* *JEN - Att 05-01 Capital expenditure – 20250131* *JEN - Att 05-10M SCS Capex model - 20250131* For 4.5.2 (b) & (c) The same price changes have been used to develop the forecast capex and opex in JEN's 2026-31 Regulatory Proposal.

Requirement	Response
(c) if the same price changes have not been used in developing both the *forecast capex* proposal and *forecast opex* proposal, why it is appropriate for different expenditure escalators to apply.	
4.6 Operating and maintenance expenditure	
Total forecast operating and maintenance expenditure (opex) 4.6.1 Provide: (a) justification for *Jemena Electricity's* total *forecast opex*, including: (i) why the proposed total forecast *opex* is required for it to achieve each of the objectives in clause 6.5.6(a) of the *NER*; (ii) how it's total forecast *opex* reasonably reflects each of the criteria in clause 6.5.6(c) of the *NER*; and (iii) how it's total forecast *opex* accounts for the factors in clause 6.5.6(e) of the *NER*	4.6.1 (a)(i) This is provided in sections 1 and 5 to 9 of *JEN – Att 06-01 Operating expenditure – 20250131.* (a)(ii) This is provided in sections 5 to 9 of *JEN – Att 06-01 Operating expenditure – 20250131.* (a)(iii) This is provided in sections 1 to 9 of *JEN – Att 06-01 Operating expenditure – 20250131* and *JEN - Att 07-01 Incentive mechanisms - 20250131.*
4.6.2 If *Jemena Electricity* used a *revealed cost base year* approach to develop its total forecast *opex* proposal, provide: (a) an explanation and justification for why that base year represents efficient and recurrent costs.	This is provided in sections 4 and 6 of *JEN – Att 06-01 Operating expenditure – 20250131.*
4.6.3 If *Jemena Electricity does not use a revealed cost base year* approach to develop its total forecast provide: (a) an explanation of major drivers for the increases and decreases in expenditure by *opex category* in the *forthcoming regulatory control period* compared to actual historical expenditure; (b) an explanation and justification for: (i) whether it considers there is a year of historical *opex* that represents efficient and recurrent costs; or (ii) why it considers no year of historical opex represents efficient and recurrent costs.	We use a revealed cost base year approach to develop our total forecast.

Requirement	Response
Output growth 4.6.4 Provide: (a) the output growth drivers used to develop the amount of total forecast *opex* attributable to output growth; (b) the weight applied to each output growth driver; (c) the forecast amount for each output growth driver; (d) evidence that the growth drivers explain cost changes due to output growth; and (e) an explanation of how, in developing the amount of total forecast *opex* attributable to output growth *Jemena Electricity* applied the above output growth measures.	This is provided in section 7.3 of *JEN – Att 06-01 Operating expenditure – 20250131* and *JEN – Att 06-03M SCS opex model – 20250131.*
Real price changes 4.6.5 Provide: (a) the labour and non-labour inputs used to develop the amount of total forecast *opex* attributable to input price growth; (b) the weight applied to each labour and non-labour input; (c) the forecast growth rate applied to each labour and non-labour input; and (d) an explanation of how, in developing the amount of total forecast *opex* attributable to changes in the price of labour and non-labour inputs, *Jemena Electricity* applied the real price measures in *Workbook 1 – Forecast, regulatory template* 2.14.	This is provided in section 7.2 of *JEN – Att 06-01 Operating expenditure – 20250131* and *JEN – Att 06-03M SCS opex model – 20250131.*
Productivity change 4.6.6 Provide, in percentage year on year terms, the productivity measure that *Jemena Electricity* used to develop the amount of total forecast *opex* attributable to changes in productivity.	We adopted 0.5% per annum productivity adjustment to our forecast opex, consistent with the AER's standard approach. This is provided in section 7.4 of *JEN – Att 06-01 Operating expenditure – 20250131* and *JEN – Att 06-03M SCS opex model – 20250131.*
4.6.7 Provide an explanation of:	This is provided in section 7.4 of *JEN – Att 06-01 Operating expenditure – 20250131* and *JEN – Att 06-03M SCS opex model – 20250131.*

Requirement	Response
(a) how, in developing the amount of total forecast *opex* attributable to changes in productivity, *Jemena Electricity* applied the productivity measure; (b) whether *Jemena Electricity's* forecast productivity changes capture the historical trend of cost increases due to changes in *regulatory obligations or requirements* and industry best practice.	
Step changes 4.6.8 Provide an explanation of why *Jemena Electricity* considers: (a) the efficient costs of the *step change* are not provided by other components of its total forecast *opex* such as base *opex*, output growth, real price growth or productivity growth; (b) the total forecast *opex* will not allow it to achieve the objectives in clause 6.5.6(a) of the *NER* unless the *step change* is included; and (c) the total forecast *opex* will not reasonably reflect the criteria in clause 6.5.6(c) of the *NER* unless the *step change* is included.	For 4.6.8 (a) to (c), please refer to *JEN - Att 06-04 Operating expenditure step changes – 20250131*
4.6.9 For each *step change* in forecast expenditure, provide a description of the *step change* and an explanation of: (a) when the change occurred, or is expected to occur; (b) what the driver of the *step change* is; (c) how the driver has changed or will change (for example, revised legislation may lead to a change in a *regulatory obligation or requirement*); and (d) how the *step change* is recurrent in nature.	For 4.6.9 (a) to (d), please refer to *JEN - Att 06-04 Operating expenditure step changes – 20250131* and *JEN – Att 06-01 Operating expenditure – 20250131.*
4.6.10 For each *step change* in forecast expenditure, provide justification for when, and how, the *step change* affected, or is expected to affect: (a) the relevant *opex category*;	Please refer to: (a) *JEN - Att 06-04 Operating expenditure step changes – 20250131* Table OV-1 for the opex category (b) We forecast capex on a bottom-up basis and therefore do not propose any capex step changes (c) *JEN - Att 06-01 Operating Expenditure - 20250131* and *JEN – RIN – xxxx – Technology Plan – 20250131*

Requirement		Response
	(b) the relevant *capex category*; (c) total opex; and (d) total capex	(d) *We forecast capex on a bottom-up basis and therefore do not propose any capex step changes*
4.6.11	For each *step change* in forecast expenditure, provide the process undertaken by *Jemena Electricity* to identify and quantify the *step change*; provide cost benefit analysis that demonstrates how it proposes to address the *step change* in a prudent and efficient manner, including: (a) the timing of the *step change*; and (b) if it considered a 'do nothing' option, evidence of how *Jemena Electricity* assessed the risks of this option compared with other options.	Please refer to: *JEN - Att 06-04 Operating expenditure step changes – 20250131*
4.6.12	For each *step change* in forecast expenditure, where the *step change* is due to a change in a *regulatory obligation or requirement* provide: (a) relevant variations or exemptions granted to *Jemena Electricity* during the *previous regulatory control period* or the *current regulatory control period*; (b) any relevant compliance audits *Jemena Electricity* conducted during the *previous regulatory control period* or the *current regulatory control period*. (c) with reference to specific clauses of the relevant legislative instrument(s), the: (i) previous regulatory obligation or requirement; and (ii) how the changed regulatory obligation or requirement is driving the step change.	Please refer to: *JEN - Att 06-04 Operating expenditure step changes – 20250131*
4.7	**Ancillary network services**	
4.7.1	Provide a description of each *ancillary network service* listed in the Standardised ancillary network services model[10] published by the *AER*.	Please refer to *JEN - Att 11-01 Alternative control services – 20250131* and *JEN – Att 11-04M ACS Fee based and quoted services model – 20250131.*

[10] AER, Standardised ancillary network services model – 31 March 2022, at AER website: standardised-ancillary-network-services-model

Requirement		Response
4.8	**Incentive schemes**	
Efficiency benefit sharing scheme 4.8.1	For the purposes of applying the *efficiency benefit sharing scheme*: (a) identify all cost categories proposed to be excluded from the operation of the *efficiency benefit sharing scheme*; (b) explain for each cost category identified the reasons for the proposed exclusion.	This is provided in *JEN – Att 07-01 Incentive mechanisms – 20250131.*
Capital expenditure sharing scheme 4.8.2	For the purposes of applying the *capital expenditure sharing scheme*: (a) identify all cost categories proposed to be excluded from the operation of the *capital expenditure sharing scheme*; (b) explain for each cost category identified the reasons for the proposed exclusion.	This is provided in *JEN – Att 07-01 Incentive mechanisms – 20250131.*
Customer service incentive scheme 4.8.3	If *Jemena Electricity* proposes to apply an *incentive design* under the *AER's* Customer Service Incentive Scheme[11], explain how the proposal meets the requirements of clause 3.3 of the Customer Service Incentive Scheme.	This is provided in *JEN - Att 07-03 - CSIS – 20250131.*
4.9	**Indicative impact on annual electricity bills**	
4.9.1	For the purposes of calculating the impact of *Jemena Electricity's regulatory proposal* on the annual electricity bill of typical residential and business customers in Victoria, provide the data source for each input used for the calculation.	Please refer to: *JEN – RIN – 4.9.1 Reconciliation model – Revenue and pricing - 20250131*
4.10	**Proposed tariff structure statement**	
4.10.1	Provide and describe the methodology and assumptions used to prepare the *long run marginal*	Please refer to: *JEN - Att 09-01 Tariff structure statement – 20250131, Section 3.2.*

[11] AER, AER's Customer Service Incentive Scheme – 21 July 2020, at AER website: customer-service-incentive-scheme

Requirement		Response
	cost estimates in *Jemena Electricity's tariff structure statement*.	
4.10.2	Describe the relationship between the expenditure, demand and other inputs (as appropriate) used in the model provided under section 4.2.5 and the expenditure, demand and other forecasts (as appropriate) provided as part of the building block proposal for the *forthcoming regulatory control period*.	The models provided in response to clause 4.2.5 were used to develop the building block proposal; therefore, there is alignment between the Proposal and the LRMC.
4.10.3	If ***Jemena Electricity*** calculates the *long run marginal cost* estimate using a method different from the Average Incremental Cost method, provide all inputs, definitions and sources for inputs, a description of the methodology, and calculations for every stage of the methodology in the in the materials submitted to the *AER*.	We adopt the AIC approach to forecasting LRMC.
4.10.4	Describe the methods and assumptions used to derive the disaggregated capex beyond the *forthcoming regulatory control period*. Provide any model(s) used to derive such *capex*.	Our modelling in relation to the long run marginal cost calculations do not disaggregate capex beyond the forthcoming regulatory period and we have not provided any additional models in response to this requirement. (This data was for the purposes of developing the Long Run Marginal Costs model).
4.10.5	Describe the methods and assumptions used to derive the disaggregated *opex* beyond the *forthcoming regulatory control period*. Provide any model(s) used to derive such *opex*.	To determine opex beyond the years of the forthcoming regulatory period, we assumed opex was 0.5% of total capital expenditure in each year. (This data was for the purposes of developing the Long Run Marginal Costs model). We note that our response to determining total capital expenditure is provided in our response to item 4.10.4.
4.10.6	Describe the methods and assumptions used to derive the disaggregated demand beyond the *forthcoming regulatory control period*. Provide any model(s) used to derive such demand.	The methods and assumptions used to derive the disaggregated demand beyond the forthcoming regulatory control period are contained in: *JEN - RIN - Support - JEN Spatial Level Maximum Demand - Forecast Procedure - 20250131* *JEN – RIN – Support – Blunomy's Vision Modelling Guide 20241122 - 20250131*
4.11	**Rate of return**	
4.11.1	For the purposes of assessing *Jemena Electricity's* proposal it must provide 'placeholder' averaging periods which will be made public and have been used to calculate an indicative rate of return in its *regulatory proposal.*	JEN has nominated a 'placeholder' averaging period for the 2026-31 Proposal of 30th August 2024 to 26th September 2024. Refer to *JEN – Att 08-02 Averaging periods – 20250131 – Public* for an explanation of JEN's proposed averaging periods.
4.12	**Regulatory asset base**	

Requirement		Response
4.12.1	If the value of the *regulatory asset base* as at the start of the *forthcoming regulatory control period* is proposed to be adjusted because of changes to *asset* service classification, provide details including relevant supporting information used to calculate that adjustment value.	There are no changes to asset service classification from the current to the forthcoming regulatory period.
4.12.2	Provide details of any departure in the allocation of actual *capex*, *asset* disposal and *customer contribution* values across *asset* classes in the *roll forward model* (as amended by the *AER* to include the 6 month period 1 January 2021 to 30 June 2021) from those reported in the Annual Reporting RIN for the relevant *regulatory years* and the reasons for that departure.	The actual gross capex in years FY22 to FY24 has been adjusted for the Software as a Service (SaaS) implementation cost. In April 2021, the International Financial Reporting Standards (IFRS) Interpretations Committee released a guidance note requiring SaaS implementation costs to be treated as opex. When the 2021-26 allowances were determined for JEN, these costs were classified as capex. To ensure our reported actuals and allowances are comparable based on consistent accounting treatments, the AER provided guidance for Jemena to continue applying the old accounting treatment (i.e. capitalising SaaS implementation costs) for the current regulatory period 2021–26 and apply the new accounting treatment from the 2026–31 period. Our Annual Reporting RIN classifies the SaaS implementation costs as opex aligning to the new IFRS treatment. We have therefore adjusted our capex for the 2022–26 period to add back the SaaS costs in the roll forward model in line with the AER's guidance, ensuring actuals and allowances are treated consistently in the regulatory models.
4.13	**Depreciation schedules**	
4.13.1	Identify any changes to standard *asset* lives for existing *asset* classes from the previous *distribution determination*. Explain the reason(s) for each change and provide supporting information.	We have not proposed changes to the standard asset lives of our existing asset classes from the previous distribution determination.
4.13.2	Identify any changes in the *post-tax revenue model* to *asset* classes from the previous *distribution determination*. Explain the reason(s) for using these new *asset* classes and provide supporting information on their proposed standard *asset* lives.	We have not proposed changes to asset classes from the previous distribution determination.
4.13.3	If any existing *asset* classes from the previous *distribution determination* are proposed to be removed and their residual values to be reallocated to other *asset* classes in the *post-tax revenue model*, explain the reason(s) for the change and provide supporting information. This should include a demonstration of the *materiality* of the change on the forecast depreciation allowance.	We propose to remove the asset class 'Public Lighting' at the start of the 2026-31 period from the SCS PTRM. This asset class has been fully depreciated (i.e. has zero residual value) by FY23. We do not expect any new capex in this asset class for the 2026-31 period as it is classified as an alternative control service. Therefore, we propose to remove this asset class from the SCS PTRM in the 2026-31 period.

Requirement		Response
4.14	**Corporate tax allowance**	
4.14.1	Identify each change to standard tax *asset* lives for existing *asset* classes from the previous *distribution determination*. Explain the reason(s) for the change and provide relevant supporting information, including Federal tax laws governing depreciation for tax purposes.	There are no changes to standard tax asset lives for existing asset classes from the previous distribution determination.
4.14.2	Identify each difference in the *capitalisation* of expenditure for regulatory accounting purposes and tax accounting purposes. Provide reasons and supporting calculations to reconcile any differences between the two forms of accounts.	Jemena Electricity uses a consistent approach to capitalisation of expenditure for regulatory accounting and regulatory tax purposes.
4.14.3	Please provide the following information regarding *immediate expensing capital expenditure* for *standard control services*: (a) Explain the approach *Jemena Electricity* used to forecast its *immediate expensing capital expenditure* for the regulatory control period commencing 1 July 2026 as provided in the proposed post-tax revenue models. (b) State if *Jemena Electricity* intends to change its tax policy on *immediate expensing capital expenditure* from its current policy.	We have proposed zero forecast immediate expensing capital expenditure for standard control services for the forthcoming regulatory control period, consistent with our actual tax practice. We do not intend to change our tax policy on immediate expensing capital expenditure for the forthcoming regulatory control period.
4.14.4	The *post-tax revenue model applies* the diminishing value (DV) method for tax depreciation purposes to all new depreciable *assets* except for certain *assets*. Where *Jemena Electricity* proposes *capex* associated with buildings and in-house software to be exempted from the DV method of tax depreciation, confirm that the proposal satisfies the following requirements: (a) Buildings (capital works): *Capex* for buildings may be depreciated using the straight-line (SL) method if it satisfies the definition of a capital work under section 43.20 of the *Income Tax Assessment Act 1997* (ITAA). (b) In-house software: *Capex* for in-house software may be depreciated using the SL method if it satisfies the definition of in-house software under section 995.1 of the ITAA, and may be	We confirm that our proposed capex in asset classes ‘in-house software’ and ‘Buildings - capital works’ satisfy the definitions in the ITAA to be depreciate using the straight-line method for tax depreciation.

Requirement		Response
	depreciated using the SL method, consistent with section 40.72 of the ITAA.	
4.15	**Related party transactions**	
4.15.1	Identify and describe all entities which: (a) are a *related party* to *Jemena Electricity* and contribute to the provision of *distribution services*; or (b) have the capacity to determine the outcome of decisions about *Jemena Electricity's* financial and operating policies.	Please refer to: *JEN - RIN 4.15 Related party transactions - 20250131* Related party contracts: *JEN - RIN - Support - AMA extended agreement - 20250131* *JEN - RIN - Support - JESA agreement - 20250131* *JEN - RIN - Support - JESA addendum letter - 20250131*
4.15.2	Provide a diagram of the organisational structure depicting the relationships between all the entities identified in the response to this section 4.15.1.	Please refer to: *JEN - RIN 4.15 Related party transactions - 20250131*
4.15.3	Identify: (a) all arrangements or *contracts* between *Jemena Electricity* and any of the other entities identified in the response to this section 4.15.1 currently in place or expected to be in place during the *forthcoming regulatory control period* which relate directly or indirectly to the provision of *distribution services*; and (a) the service or services that are the subject of each arrangement or contract.	Please refer to: *JEN - RIN 4.15 Related party transactions - 20250131*
4.15.4	For each service identified as the subject of each arrangement or *contract*: (a) provide: (i) a description of the process used to procure the service; and (ii) supporting documentation including, but not limited to, requests for tender, tender submissions, internal committee papers evaluating the tenders, *contracts* between *Jemena Electricity* and the relevant provider.	Please refer to: *JEN - RIN 4.15 Related party transactions - 20250131*

Requirement	Response
(b) explain: (i) why that service is the subject of an arrangement or *contract* (i.e. why it is outsourced) instead of being undertaken by *Jemena Electricity* itself; (ii) whether the services procured were provided under a standalone *contract* or provided as part of a broader operational agreement (or similar); (iii) whether the services were procured on a genuinely competitive basis and if not, why not; and (iv) whether the service (or any component thereof) was further outsourced to another provider by the *related party*.	

5. Basis of preparation

Requirement		Response
5.1	**General instructions**	
5.1.1	*Jemena Electricity* must explain the basis upon which it prepared information to populate the input cells for all information (other than *forecast information*) in the *regulatory templates*.	Please refer to: *JEN - RIN 4 - Basis of preparation – 20250131.*
5.1.2	The *basis of preparation* must be a separate document (or documents) that Jemena Electricity submits with its completed regulatory templates.	Noted.
5.1.3	The *basis of preparation* must follow a logical structure that enables the *AER* to clearly understand how *Jemena Electricity* has complied with the requirements of this *notice*.	Noted.
5.2	**Basis of preparation requirements**	
5.2.1	For historical information provided in response to this *notice* (i.e information other than *forecast information)*, *Jemena Electricity* must prepare a *basis of preparation* in accordance with the requirements specified in this *notice*. The *basis of preparation* must: (a) demonstrate how the information provided is consistent with the requirements of this *notice*; (b) explain the source from which *Jemena Electricity* obtained the information provided; (c) explain the methodology *Jemena Electricity* applied to provide the required information, including any assumptions *Jemena Electricity* made; (d) explain, in circumstances where *Jemena Electricity* cannot report *actual information* and therefore must report *estimated information*: (i) why an estimate was required, including why it was not possible for *Jemena Electricity* to use *actual information*; (ii) the basis for the estimate, including the approach used, assumptions made and reasons why the estimate is *Jemena Electricity's* best estimate.	In compliance with the requirements (a) to (d) JEN has prepared a standalone report explaining the basis of preparation of the historical information submitted in the templates. Refer to *JEN - RIN 4 - Basis of preparation - 20250131.* JEN's Basis of Preparation is structured using the same logical structure as the RIN templates issued by the AER (see *JEN - RIN 4 - Basis of preparation - 20250131*)
5.2.2	*Jemena Electricity* may provide additional detail beyond the minimum requirements if it considers it may assist a user to gain an understanding of the information presented in the *regulatory templates*.	Noted.

6. Assurance requirements

Requirement		Response
6.1	**Audit and/or assurance reports**	
6.1.1	Audits and reviews must be conducted in compliance with Australian Auditing and Assurance Standards, as developed by the Auditing and Assurance Standards Board.	Noted.
6.1.2	When undertaking an audit or review on the historical information in the *regulatory templates* presented by *Jemena Electricity*, an auditor or assurance practitioner shall opine or attest by reference to *Jemena Electricity's basis of preparation*.	Noted.
Provision of audit and assurance reports		
6.1.3	*Jemena Electricity* must provide the AER with the *audit reports* and/or *assurance reports* as applicable, prepared in accordance with the requirements set out in this section 6.1.	See: *JEN - KPMG - RIN 6.1.3 - Non-financial review conclusion - ASAE 3000 compiled - 20250128 - Confidential* *JEN - KPMG - RIN 6.1.3- Financial review conclusion - ASA 805 compiled - 2050128 – Confidential*
General requirement to audit or review		
6.1.4	The independent audit or review requirements set out in this section 6.1 apply to the following types of historical information collected in the *regulatory templates* attached at Appendix A: (a) Actual *financial information*; (b) Estimated *financial information* where *Jemena Electricity* certifies that it is not possible to provide actual historical information; and (c) Actual and estimated *non-financial information*.	Noted.
Exceptions to audit or review requirements		
6.1.5	The general requirement to audit or review does not apply to *actual information* or *estimated information* that: (a) has previously been audited according to the standards set out in sections 6.1.10, 6.1.11 and 6.1.12, and submitted to the *AER*; and (b) is not *materially* altered by changes to the cost allocation method or service classifications to take effect from 1 July 2026.	Noted.
6.1.6	For clarity, the independent audit or review requirements do not apply to *Forecast information* and auto populated cells in the *regulatory templates* attached at Appendix A.	Noted.

Requirement	Response
Class of person to conduct audits or reviews 6.1.7 The audit or review of actual or estimated *financial information* must be conducted by the Auditor General, or a person who: (a) is a registered company *auditor* who is a member of the Chartered Accountants Australia and New Zealand (CA or FCA) or of CPA Australia (CPA or FCPA) that holds a Certificate of Public Practice; or (b) is independent from *Jemena Electricity* and all of its related bodies corporate – that is, not a principal, member, shareholder, officer, or employee of *Jemena Electricity* or its related entities; (c) is appointed for the purposes of expressing an opinion or conclusion on the audit or review requirements outlined in section 6.1 of this *notice*; (d) has experience in conducting financial, performance, operation or quality assurance audits and conducting data sampling in the electricity industry; (e) possesses relevant knowledge and experience in the electricity industry, engineering, IT systems, asset management or *customer service* as relevant to the audit or review; (f) understands regulatory accounting methods, including *Jemena Electricity's cost allocation method* and the *AER's* Ring-fencing Guideline Electricity Distribution; (g) understands the definitions, procedures and methodologies specified in the *NER* and/or this *notice* that have been used in the preparation of the information the subject of the audit or review; and (h) is available to discuss issues relating to the audit or review with *Jemena Electricity* and the *AER*, including where an *audit report* or *assurance report* is critical of, or highlights deficiencies in, the audited *financial information* and/or *non-financial information*.	In conducting the assurance process, Jemena Networks has engaged a class of person that meets the RIN audit or review requirements .
6.1.8 The review of *non-financial information* may be conducted by a person who is an assurance practitioner as defined in *ASAE 3000 Assurance engagements other than audits or reviews of historical financial information* and satisfies the requirements set out in (b) to (h) above.	Noted.
Audit of actual financial information 6.1.9 The audit of actual *financial information* must: (a) comply with Auditing Standard ASA 805 *Special Considerations — Audits of Single Financial Statements and Specific Elements, Accounts or Items of a Financial Statement*; and (b) include an *audit report* that includes an opinion as to whether or not the actual *financial information* presents fairly, in all material respects in	Noted. *Refer JEN - KPMG - RIN 6.1.3- Financial review conclusion - ASA 805 compiled - 2050128 – Confidential*

Requirement	Response
accordance with the requirements of this *notice* and the *Jemena Electricity's basis of preparation*; and (c) list all tables and sub-tables included within scope of the assurance engagement.	
Review of estimated financial information 6.1.10 The review of *estimated financial information* must: (a) comply with *ASRE 2405 Review of Historical Financial Information Other than a Financial Report*; and (b) include an *assurance report* as to whether or not anything has come to the *auditor's* attention that causes it to suggest that the estimated historical *financial information* is not prepared, in all *material* respects, in accordance with the requirements of this *notice* and *Jemena Electricity's* basis of preparation; and (c) list all tables and sub-tables included within scope of the assurance engagement.	Noted.
Review of non-financial information 6.1.11 The review of non-financial information must: (a) comply with *ASAE 3000 Assurance engagements other than audits or reviews of historical financial information*; and (b) include an *assurance report* as to whether or not anything has come to the *auditor's* attention that causes it to suggest that the historical *non-financial information* does not, in all *material* respects, present fairly in accordance with the requirements of this *notice* and *Jemena Electricity's* basis of preparation; and (c) list all tables and sub-tables included within scope of the assurance engagement.	Noted.
6.2 Statutory declaration	
Context for the provision of a statutory declaration 6.2.1 Under s. 28M(d) of the *NEL* the *AER* may ask for information collected under a regulatory information instrument to be verified by way of statutory declaration by an officer of *Jemena Electricity*. The *AER* requires a statutory declaration to be made to ensure: • the information provided in response to the *notice* has been given appropriate scrutiny by an *officer* of the company; and	Please refer to *JEN - RIN 11 - Statutory declaration – 20250128.*

Requirement		Response
	• the information we receive is of sufficient quality such that it is appropriate for the *AER* to exercise its powers and functions under the *NEL* to achieve the *NEO*.	
6.2.2	The *notice* requires information be provided to the *AER* covering the services provided by *Jemena Electricity* and regulated by the *AER*.	Noted.
6.2.3	In summary, the statutory declaration specifies *actual information* must be true and accurate and the forecasts and historical estimates provided in response to this *notice* are the best forecasts and estimates able to be provided by *Jemena Electricity*. These standards are intended to deliver the highest quality information to the *AER*, to ensure it is able to make decisions that promote efficient investment in, and efficient operation and use of, energy services for the long-term interests of consumers.	Noted.
Statutory declaration requirements		Noted.
6.2.4	The *notice* requires a company *officer* of *Jemena Electricity* to attest to the quality of the information provided in response to the *notice*, in accordance with the form of statutory declaration set out in section 6.2.8.	
6.2.5	When attesting to the quality of the *forecast information* provided the *officer* of *Jemena Electricity* should take into account relevant factors including (but not limited to) whether *forecast information* provided in response to this *notice*: (a) meets the requirements of the *NEL* and the *NER* that should be taken into account when preparing the information for the *notice* and *regulatory proposal*; (b) meets the requirements of this *notice;* (c) has been prepared by considering the outcomes of the consumer consultation undertaken to prepare the *regulatory proposal;* (d) is consistent with the information provided in the *regulatory proposal* of *Jemena Electricity*, including the models for *asset* roll forward, *operating expenditure*, *capital expenditure* and revenue forecasts; (e) is based on assumptions, which are identified in response to section 4.2.1(b) of this *notice*, and are justified and supported by evidence; (f) is consistent with applicable *AER* Guidelines, or where it varies from those guidelines, is consistent with the variation as set out in the *regulatory proposal*; and (g) is consistent, to the extent possible, with historical information previously provided to the *AER*.	Noted.
6.2.6	When attesting to the quality of the historical information provided the *officer* of *Jemena Electricity* should take into account relevant factors including (but not	Noted.

Requirement	Response
limited to) whether estimated historical information provided in response to this *notice*: (a) meets the requirements of this *notice* (b) is based on assumptions, which are identified in response to section 4.2.1(b) of this *notice*, and are justified and supported by evidence*;* (c) is consistent with applicable *AER* Guidelines, or where it varies from those guidelines, is consistent with the variation as set out in the *regulatory proposal*; and (d) is consistent to the extent possible, with historical information previously provided to the *AER*.	
Form of the statutory declaration 6.2.7 An *officer* of *Jemena Electricity* is required to complete a statutory declaration form appropriate for the jurisdiction in which the *officer* resides.	Noted.
6.2.8 In completing the form the officer must make a declaration in the following terms: 1. I am an *officer*, for the purposes of the *National Electricity (Victoria) Law*, of Jemena Electricity Networks (VIC) Limited (ABN 82 064 651 083) (*Jemena Electricity)* a regulated network service provider for the purposes of section 28D of the *NEL*. I am authorised by *Jemena Electricity* to make this statutory declaration as part of the response of *Jemena Electricity* to the Regulatory Information Notice dated 17 October 2024 (*notice*) served on *Jemena Electricity* by the Australian Energy Regulator (AER). <u>Historical Information</u> 2. I say that the actual information (as defined in the *notice*) provided in *Jemena Electricity*'s response to the *notice* is, to the best of my information, knowledge and belief: (a) in accordance with the requirements of the *notice*; and (b) true and accurate. 3. Where it is not possible to provide actual information to comply with the *notice*, *Jemena Electricity* has, to the best of my information, knowledge and belief: (a) Provided *Jemena Electricity*'s best estimate of the information in accordance with the requirements of the *notice*; and (b) Provided the basis for each estimate, including assumptions made and reasons why the estimate is the best estimate.	Please refer to *JEN - RIN 11 - Statutory declaration – 20250128.*

Requirement	Response
Forecast Information 4. Where *Jemena Electricity* has provided forecast information in response to the *notice*, *Jemena Electricity* has, to the best of my information, knowledge and belief provided forecast information which is *Jemena Electricity's* best forecast of the information in accordance with the requirements of the *notice*.	

7. Definitions

Requirement		Response
7.1	**Interpretation**	
7.1.1	In this *notice* unless the contrary intention appears: • the singular includes the plural and the plural includes the singular • expressions such as “includes” or “for example”, in any form, are not words of limitation • a reference to any corporation, whether expressly identified or not, includes a reference to any representatives of that corporation, and • words printed in italics like *this* will have the meaning given in Appendix B of this *notice*, or the meaning given in the *NEL* or *NER* if that term is not defined in this *notice.*	Noted.
7.2	**Terms used in this notice and regulatory templates**	
7.2.1	The terms used in this *notice* and in the *regulatory templates* are defined in Appendix B to this *notice.*	Noted.