AusNet Electricity Services Pty Ltd

AER Annual Regulatory Accounts

2020 Regulatory Year Basis of Preparation

Basis of Preparation
2020 Regulatory Year

Overview

This Basis of Preparation (**BoP**) document supports the preparation and reporting of the 2020 Regulatory Year data presented in AusNet Electricity Services Pty Limited's ("AusNet Electricity Services" or "the Company") reports entitled 'Regulatory Accounting Statements – Consolidated' and 'Regulatory Accounting Statements – Public' ("the Reports" or "Regulatory Accounts").

The Reports have been prepared in accordance with the 'Regulatory Information Notice issued under section Division 4 of Part 3 of the *National Electricity (Victoria) Law'* (**RIN**) issued by the Australian Energy Regulator (**AER**) on 3 February 2016.

AusNet Electricity Services' 2020 Regulatory Year is the period 1 January 2020 to 31 December 2020 (**Regulatory Year**). Data included in the Reports has been provided for the 2020 Regulatory Year. All financial data is presented in whole Australian dollars, unless otherwise stated in the template. Non-financial data is stated as per the measures specified in the Reports. The ultimate Australian parent entity of the Company is AusNet Services Limited.

The AusNet Services' Group (**The Group)** owns and operates 3 regulated networks – an electricity distribution network, a gas distribution network and an electricity transmission network, as well as unregulated businesses. Employees of The Group work across the 3 regulated networks and there are shared costs, overheads and other corporate costs that cannot be directly allocated to a particular network or other business units. These costs are proportioned amongst the Group's 3 regulated networks, as well as the unregulated businesses. For the Regulatory Year, the ABC Survey process was replaced with a new indirect (causal) cost allocation approach in accordance with the AusNet Services' Cost Allocation Methodology (**CAM**).

Materiality has been applied throughout the Reports and Basis of Preparation. Materiality is defined as information that if omitted, misstated or not disclosed has the potential, individually or collectively to influence the economic decisions of users.

In conformity with AER requirements, the preparation of the Reports requires the use of certain critical management estimates. For the purpose of preparing the Reports, 'Estimated Information' is defined as information presented in the Reports whose presentation is not materially dependent on information recorded in accounting records or other records used in the normal course of business, and whose presentation for the purpose of the RIN is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a materially different presentation in the Reports.

Where Estimated Information has been presented, the circumstances and the basis for the estimate, including the approach used, assumptions made and reasons why the estimate is AusNet Electricity Services' best estimate has also been set out below. Estimates are Management's best estimate based on the data available. Estimates will often not equal the related actual results and estimates have only been made for the purpose of disclosing the information required under the RIN. Considerations of the cost and efficiency of preparation as well as the reliability and accuracy of data available have been considered in determining the best methodology to determine the estimates.

'Actual Information' is defined as information materially dependent on information recorded in historical accounting records or other records used in the normal course of business, and whose presentation is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to AusNet

Basis of Preparation
2020 Regulatory Year

Services materially different presentation. Any information or allocation which has been calculated via the indirect cost allocation process is considered Actual Information, as this is in accordance with the AER approved CAM.

The Reports require revenues and expenditure to be allocated between Standard Control Services and Alternative Control Services - as defined in the 2016-2020 Electricity Distribution Determination ("Distribution Determination").

The CPI Adjusted Forecast values are the forecast expenditure per the Distribution Determination, deflated by removing the impact of the AER forecast inflation and re-inflated by CPI to be in equivalent dollar terms to the actual expenditure for the Regulatory Year. In certain cases, expenditure in the Distribution Determination was forecast at the total level and not in the various categories required to be disclosed in the Regulatory Accounts. In these circumstances only the total forecast expenditure is shown.

Amounts reported as 'Audited Statutory Accounts' are sourced from the AusNet Electricity Services Pty Limited's trial balance which reconcile in aggregate to the audited Special Purpose Financial Report ("SPFR"). The Financial Statements have been prepared to assist the Directors of the AusNet Electricity Services Pty Limited to meet the requirements of the AER. To the extent applicable, the information reported has been prepared in a manner consistent with the policies and methodologies applied in preparing the Annual Regulatory Accounts. There were no changes in Accounting Policies during the Regulatory Year that had a material impact on the information presented.

The preparation methodologies and information sources adopted in the preparation of the Reports are set out below.

AusNet Electricity Services Pty Ltd

Basis of Preparation
2020 Regulatory Year

Contents

2.11 Labour

Labour includes all expenditure used to deliver standard control services that is associated with people. Labour expenditure relates to -
- Full time, part time and casual employees;
- Ongoing and temporary employment contracts; and
- Labour hire contracts.

Labour expenditure includes wages, salaries, overtime payments, bonuses, allowances, incentive payments, superannuation contributions, taxes, termination and redundancy payments, workers compensation and purchases made on behalf of employees.

Controllable Non-Labour expenditure is all non-labour expenditure that is not Uncontrollable Non-Labour expenditure. Such costs include materials, fuels, insurance and guaranteed service level ("GSL") payments.

Uncontrollable Non-Labour expenditure is all non-labour expenditure over which AusNet Electricity Services has no control. Uncontrollable Non-Labour expenditure is generally imposed by independent Government bodies.

Data reported relates to Standard Control Services ("SCS") only.
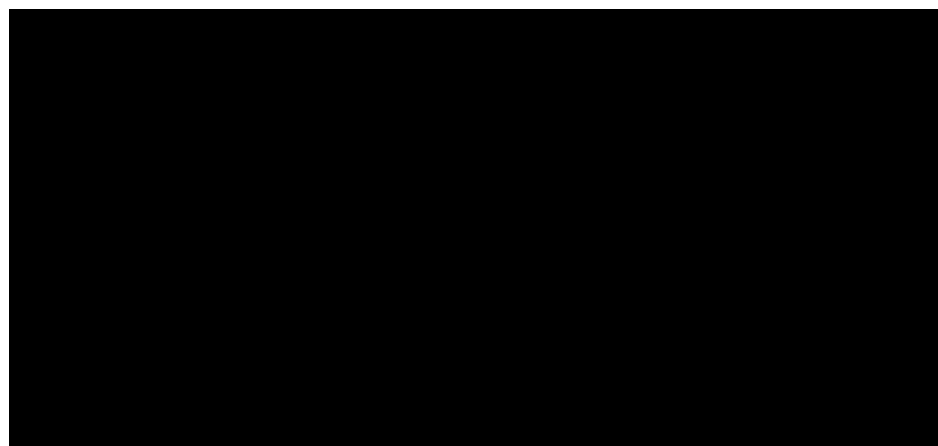
Preparation Methodology:

2.11.3.1 Opex

Opex data was sourced from SAP and from the workings to Template 8.4 Opex.

'In-house Labour Expenditure' is considered to include all labour costs relating to employees of the AusNet Services Group which is SCS Opex in nature.

'Labour Expenditure Outsourced to Related Parties' and 'Labour Expenditure Outsourced to Unrelated Parties' have been reported as $nil as AusNet Electricity Services has not outsourced any labour to related or unrelated parties. Although AusNet Electricity Services incurs SCS opex from its contractors, the labour services they provide as part of their contractor arrangements do not constitute employment contracts or labour hire arrangements as defined in the notice and as such have not been reported as Labour Expenditure. This definition differs to how AusNet Electricity Services interprets 'Outsourced Labour' internally and in the Distribution Determination and therefore underestimates the total (i.e., both internal and contracted) SCS labour costs incurred by AusNet Electricity Services. Below is a table showing AusNet Electricity Services' internal view (consistent with the methodology in the Distribution Determination) of the Opex Labour / Non-Labour split.

Basis of Preparation
2020 Regulatory Year

'Uncontrollable Non-Labour Expenditure' includes rates, licenses, taxes and levies in accordance with the prescribed definitions. Any residual SCS Opex has been classified as 'Controllable Non-Labour Expenditure'.

2.11.3.2 Capex

Capex data was sourced from SAP and from the workings to Template 8.2 Capex.

'In-house Labour Expenditure' is considered the labour costs of employees of the AusNet Services Group who have been directly time sheeted to SCS capital projects.

'Labour Expenditure Outsourced to Related Parties' and 'Labour Expenditure Outsourced to Unrelated Parties' have been reported as $nil as AusNet Electricity Services has not outsourced any labour to related or unrelated parties. Although AusNet Electricity Services incurs SCS capex from its contractors, the labour services they provide as part of their contractor arrangements do not constitute employment contracts or labour hire arrangements as defined in the notice and as such have not been reported as Labour Expenditure. This definition differs to how AusNet Services interprets 'Outsourced Labour' internally and in the Distribution Determination and therefore underestimates the total (i.e., both internal and contracted) SCS labour costs incurred by AusNet Electricity Services. Below is an unaudited table showing AusNet Electricity Services' internal view (consistent with the methodology in the Distribution Determination) of the Opex Labour / Non-Labour split.

AusNet Electricity Services does not have any 'Uncontrollable Non-Labour Expenditure' that is capex in nature. Any residual SCS Capex has been classified as 'Controllable Non-Labour Expenditure'.

Estimated Information:

All information reported is Actual Information. No estimates were required.

AusNet Electricity Services Pty Ltd

Basis of Preparation
2020 Regulatory Year
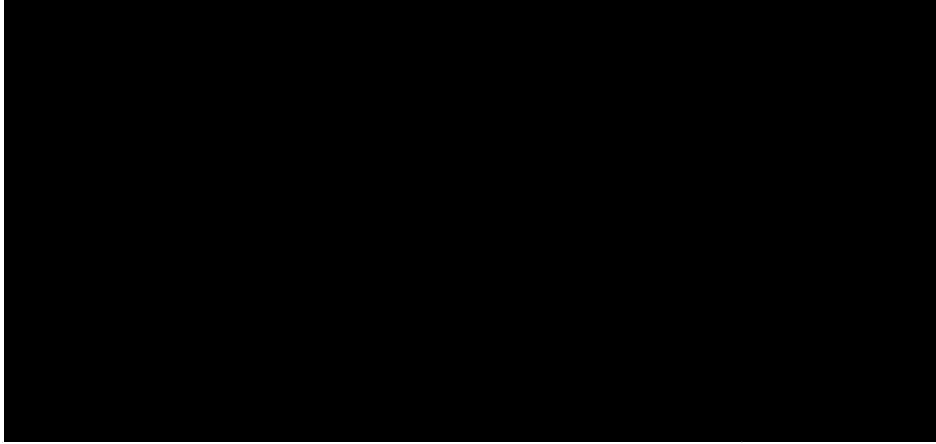
Basis of Preparation
2020 Regulatory Year

3.6 Quality of Services

Table 3.6.5 Quality of supply

Voltage variations

This data was sourced from the Power Quality (**PQ**) data warehouse via the user interface (UI) of the Power Monitoring Expert (**PME**) software. PQ data from field devices (i.e., ION 7650, EDMI MK6) that monitors voltage sags and swells (variations) are uploaded into the data warehouse on a regular basis and made available to users via PME or backend data request to PME Support.

Preparation Methodology:

- Login to PME software using admin-issued credentials.
- Go to "REPORTS" menu located at the upper right corner of the UI page.
- Under the Power Quality folder, select "PQ Regulatory Report".
    - In the Reporting Period drop down list, select "Fixed Date…" and enter the start and end date/time for the report.
    - Accept all default settings as shown the UI screenshot below.

- Click on Generate Report.

- Perform sanity checks to ensure no data issues in the generated report. Consult network planners if necessary.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Basis of Preparation

Table 3.6.6 Complaints - Technical Quality of Supply

Preparation Methodology:

Complaints data was stored within AusNet Electricity Services' system 'Service Now' (SNOW). When a complaint is lodged, one of the mandatory fields is 'complaint category' which includes 'technical quality of supply'.

Complaints relating to technical quality of supply are exported to a spreadsheet and filtered by 'complaint type' – another field which provides further details of the nature of the complaint. Complaints related to TV and radio interference are specifically captured and reported in the template. Other complaint categories and the 'likely causes of complaints' are estimated by the Customer Resolutions Manager, based on further analysis of the data.

Estimated information:

'Complaints by likely cause' and the complaint categories (excluding 'TV and radio interference') are estimated. This estimation is based on a combination of analysis of individual complaints on a case-by-case basis and the judgment of the Customer Resolutions Manager (judgment is applied to allocate complaints into the categories required).

Table 3.6.7 Customer Service

Timely Provision of Services

Preparation Methodology:

New connections data was sourced from SAP. New connections are defined as those connections comprising a brand-new meter and connection of supply. This does not include re-energisations. There are two standard reports which form the basis of the reporting:
- a Service Order Report, which is generated for a selected order status (i.e., 'completed') and period (calendar year 2020); and
- a Running Operations Report, which is generated to identify service orders that have not been completed by the appointment date.

The data reported was the output of these reports.

AusNet Electricity Services procedure document 'New Connections Reporting' (Work Instruction ID 8.1.4.01) contains detailed instructions for these operations.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Timely repair of faulty streetlights

Streetlights - average monthly number of streetlights "out"

This data is calculated by dividing the total number of streetlight faults (Template 6.9 STPIS GSL) by 12.

Streetlights – not repaired by "fix by" date.

Basis of Preparation
2020 Regulatory Year

This metric has been reported as zero. AusNet Electricity Services rarely contacts customers to obtain an agreed date for streetlight repair.

Streetlights - average number of days to repair.

This is determined by filtering the 'Trouble Symptom' column in the Fusion Distribution and Outage Management System ("DOMS") report for all faults except 'Found by Light patrol' and 'Watchman lights'. The total of the number all days to fix these faults is divided by the total number of the same faults.

Total streetlights

This is the same data provided in Template 6.9 STPIS GSL.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Call Centre Performance

Due to the impact COVID on working arrangements, a remote working system was created and utilised. The system is known as ipScape and recreated existing reports used in the RIN templates.

Preparation Methodology:

'Average waiting time before calls are answered' was calculated by running the 'Historical Split/Skill Summary Monthly' report from the Avaya call centre system. This report contains average speed of answer and number of calls queued for each month, by call queue (Electricity Faults, Wire Down, Life Threatening and Streetlights). The weighted average of all queues/months was reported in the template.

'Percentage of Calls abandoned' was obtained from the same report, using the Total Abandoned and Total Offered fields. Total Abandoned divided by Total Offered provided the percentage abandoned.

'Number of overload events' was calculated as those instances where there is a variance of greater than 10 calls shown as having a 'Busy' end result on the Telstra 131 799 call result report.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Number of Customer complaints

Preparation Methodology:

Complaints data was stored within AusNet Electricity Services' system 'Service Now' (SNOW). When a complaint is lodged, the mandatory field 'complaint category' is recorded. To report against the categories in Table 3.6.7, complaints were exported to a spreadsheet and filtered by the 'complaint category' field. This data was directly transferred to the Template.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Basis of Preparation
2020 Regulatory Year

Supporting data used for Templates 3.6.8, 3.6.9, 6.2, 6.7 and 6.8.

Reliability Information is reported for unplanned interruptions which is an interruption due to an unplanned event. An unplanned event is considered an event that causes an interruption where the customer has not been given the required notice for the interruption or where the customer has not requested the outage.

A sustained interruption is any loss of electricity supply to a customer associated with an outage of any part of the electricity supply network, including generation facilities and transmission networks, of equal or more than 60 seconds in duration, including outages affecting a single premise. Momentary interruptions last for less than 60 seconds.

Note - AusNet Services' Outage Management System (Poweron) reports momentary interruption as loss of supply interruption continuing for a period of less than one minute, consistent with the Distribution Code.

The STPIS RIN report definition of a momentary interruption is a loss of supply with duration of one minute or less. The calculated errors in SAIDI, SAIFI and MAIFI were all less than 2.0%, hence reported values are considered accurate and actual information for reporting purposes.

The customer interruption starts when recorded by equipment or, where such equipment does not exist, at the time of the first customer call relating to the network outage. An interruption may be planned or unplanned, momentary or sustained. Subsequent interruptions caused by network switching during fault finding are not included. An interruption ends when supply is again generally available to the customer.

To prepare Templates 6.2 STPIS Reliability, 6.7 STPIS Daily Performance and 6.8 STPIS Exclusions, three supporting reports are first prepared. The Basis of Preparation for those Templates should be read in conjunction with this section.

The process undertaken to produce these supporting reports is described in Section 3.6.8.

Basis of Preparation
2020 Regulatory Year

3.6.8 Network - feeders

Feeder Classification

- Obtain Feeder Maximum Demand ("MVA") from Network Strategy and Planning (Region Planners).
- Obtain the year-end feeder level summary for overhead and underground line length SDME Support Team via IT Helpdesk.
- Feeders were classified to either Urban, Short Rural or Long Rural:
  - Urban Feeder: $\frac{Maximum\ Demand\ (MVA)}{Overhead+Undergraound\ Lengt\ (km)} > 0.3\ MVA/km$
  - Short Rural Feeder is not an urban feeder with total Overhead and Underground line length less than 200 km.
  - Long Rural Feeder is not an urban feeder with total Overhead and Underground line length greater than 200 km.

Customer Count Estimation Process

- Obtain Customer Count by Feeder report from Poweron Fusion. This report is automatically generated on the first day of each month.
- The 2020 calendar year average customers count was estimated by:
$$\frac{Customer\ Count\ on\ 1\ Jan\ 2020 + Customer\ Count\ on\ 1\ Jan\ 2021}{2}$$

Network Outage Summary

- Extract the 2020 Network Outage Summary Report from Poweron Fusion. Ensure that all incident status is equal to 'Completed'. This status is attained once all data clean-up and validation have been carried out by CEOT Data Analysts.
- To distinguish between Unplanned and Planned outages in the Network Outage Summary Report, apply the following filters to field name 'Classification' as follows:
  - Planned Outages = Planned HV Incident; Planned LV Incident
  - Unplanned Outages <> Planned HV Incident; Planned LV Incident
- If no cause has been recorded in an incident, cause group of 'Other' is applied.
- The MED threshold for 2020 was calculated from supply interruption data between year 2015 to 2020. If the USAIDI on one particular day exceeds the MED threshold value, it will be classified as a Major Event Day ("MED").
- Below incidents were reported in the STPIS exclusions list:
  - Transmission-related incidents. During the year transmission events that affected the distribution network are monitored and recorded.
  - Selected supply interruptions that occurred during the Total Fire Ban ("TFB") day as a result of the mandatory suppression of reclose functions on protective devices in areas covered by a TFB declaration.
  - Supply interruptions associated with equipment failure during the initial and pre-conditioning tests of Rapid Earth Fault Current Limiter ("REFCL") deployment.
  - Supply interruptions due to inter-distributor connection failures.

3.6.9 Network - reliability

Preparation Methodology:

Basis of Preparation
2020 Regulatory Year

From the Network Outage Summary report, a summary of planned outages per feeder classification (i.e., Urban, Short Rural and Long Rural) was created.

The System Average Interruption Duration Index ("SAIDI") value per network categorisation was calculated by dividing the sum of CMOS with the end of year count of customers per feeder classification.

The System Average Interruption Frequency Index ("SAIFI") value per network categorisation was calculated by dividing the sum of Customer Interruptions with the end of year count of customers per feeder classification.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Basis of Preparation
2020 Regulatory Year

4.1 Public Lighting

Public Lighting is as defined in the 2016-2020 Distribution Determination.

Preparation Methodology:

Data reported as the 'Number of Lights' was determined based on December 2020 billing information.

Public Lighting Revenue was obtained from billing data sourced from the billing system. The categorisation by light type and between Efficient and Non-Efficient Public Lighting Revenue was based on the descriptions of the amounts billed.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Basis of Preparation
2020 Regulatory Year

6.2 STPIS Reliability

System Average Interruption Duration Index is, as per the STPIS, the sum of the duration of each sustained interruption (in minutes) divided by the total number of distribution customers as defined in the service target performance incentive scheme.

System Average Interruption Frequency Index is, as per the STPIS, the total number of sustained interruptions divided by the total number of distribution customers as defined in the service target performance incentive scheme.

Momentary Average Interruption Frequency Index ("MAIFI") is, as per the ESCV's Information specification (Service performance) for Victorian Electricity Distributors, April 2020 version 11, p. 62: 'The total number of momentary interruptions divided by the total number of connected customers averaged over the year'.

A Distribution Customer is a distribution customer (with active accounts) with an active National Metering Identifier ("NMI").

Preparation Methodology:

Using the Network Outage Summary report (obtained from the Poweron Fusion application), a summary table of unplanned outages for Customer Interruptions (sustained and momentary) and CMOS by feeder classification (i.e. Urban, Short Rural and Long Rural) was created. A similar table less all exclusions was also created. The SAIDI, SAIFI and MAIFI values were calculated using the average customer count by feeder classification.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Basis of Preparation
2020 Regulatory Year

6.6 STPIS Customer Service

A call to the fault line answered in 30 seconds is measured from when the call enters the telephone system of the call centre (including that time when it may be ringing unanswered by any response) and the caller speaks with a human operator but excluding the time that the caller is connected to an automated interactive service that provides substantive information. This measure does not apply to:

> (a) Calls to payment lines and automated interactive services

> (b) Calls abandoned by the customer within 30 seconds of the call being queued for response by a human operator.

Total number of calls is the total number of calls to the fault line to be reported, including any answered by an automated response service and terminated without being answered by an operator. It excludes missed calls where the fault line is overloaded.

Being placed in an automated queuing system (automated or otherwise) does not constitute a response.

Telephone answering

Preparation Methodology:

This data was derived from Template 6.7 Daily Performance data. 'Number of calls received' exclude calls to payment lines/automated interactive services and calls abandoned within 30 seconds, per the STPIS Guidelines. These calls are removed by separately identifying them in the data extract from Avaya (see Basis of Preparation for Template 6.7).

AusNet Electricity Services' telephone answering process cannot, in any practicable way, link individual phone calls to individual incidents. In order to exclude calls from customers relating to MED incidents, post code data (captured in the AusNet Electricity Services Phone System) was used. The post codes from customer calls were compared to the post codes of MED incidents to quantify the call data to exclude. This method is only used to exclude data on subsequent days should an incident not be resolved within the same day it occurs (in accordance with clause 5.4). 1 MED was excluded within this review period which lasted 8 days and the first day also qualified for a SAIDI exception, therefore postcode data was used to exclude the following 4 days. The final three days of the MED event were of minimal impact and as such have been included without any alteration.

AusNet Services Contact Centre excludes events under clause 3.3(b) of the Service target performance incentive scheme where an event may be excluded where daily unplanned SAIDI for the DNSP's distribution network exceeds the major event day boundary, as set out in appendix D, when the event has not been excluded under clause 3.3(a).

We do not exclude data relating to 3.3(a) (5) – Load Interruptions caused by a failure of the shared transmission network as the contact centre only services distribution fault calls. If an interruption on the transmission network affects distribution, this data is excluded under 3.3b conditions.

Estimated Information:

Basis of Preparation
2020 Regulatory Year

All information reported is Actual Information. No estimates were required. The approach taken to exclude MED data is not considered to result in Estimated Information as the data used was system generated and there is not a valid, alternative approach that would lead to materially different data being reported.

Basis of Preparation
2020 Regulatory Year

6.7 STPIS Daily Performance

Daily performance data contains AusNet Electricity Services' daily performance on MAIFI and customer service metrics for each day between the period 1 January 2020 and 31 December 2020.

Customer service data

System data for this report is extracted from Avaya CMS Supervisor Reporting tool (Avaya is the current telephony system provider) and the IPScape Reporting Interface (IPScape are the current IVR Platform Provider).

The following reports were generated:

- **Number of calls received:** As per the STPIS Guidelines, this excludes calls to payment lines/automated interactive services and calls abandoned within 30 seconds. These are identified as follows:
  - **Calls received excluding calls to payment lines/automated services:** This was calculated by running the 'NM – CFE Summary Daily Multi Skills V3 report' (Avaya CMS) by day from 1 January 2020 – 31 December 2020 on the following electricity fault call queues; Wire Down, Streetlights, Life Threatening, Electricity Faults
  - **Calls abandoned within 30 seconds:** The 'NM – CFE Summary Daily Multi Skills V3' report (Avaya CMS) was run per day from 1 January 2020 – 31 December 2020 on the following electricity fault call queues; Wire Down, Streetlights, Life Threatening, Electricity Faults
- **Number of calls answered in 30 seconds:** The 'NM – CFE Summary Daily Multi Skills V3' report (Avaya CMS) was run per day from 1 January 2020 – 31 December 2020 on the following electricity fault call queues; Wire Down, Streetlights, Life Threatening, Electricity Faults.

In order to exclude calls from customers relating to MED incidents, post code data (captured in the AusNet Electricity Services Phone System) was used. The post codes from customer calls were compared to the post codes of MED incidents to quantify the call data to exclude.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Daily performance data

Preparation Methodology:

MAIFI data

Using the Network Outage Summary report (obtained from Poweron Fusion), a daily summary of customer interruptions caused by momentary outages by feeder classification (i.e., Urban, Short Rural, and Long Rural) was generated. A momentary outage has an outage duration = 0. The daily MAIFI from each feeder classification was calculated using the average customer count by feeder classification.

The AER RIN template specifies that "excluded events to be removed from the data refer only to events listed in the clause 3.3(a) of the STPIS with respect to reliability data

Estimated Information:

Basis of Preparation
2020 Regulatory Year

All information reported is Actual Information. No estimates were required.

6.8 STPIS Exclusions

With reference to STPIS section 3.3(a), exclusions refer to supply interruption events caused by any of the following conditions:

1) [Deleted]
2) load shedding due to a generation shortfall.
3) automatic load shedding due to the operation of under frequency relays following the occurrence of a power system under-frequency condition.
4) load shedding at the direction of the Australian Energy Market Operator (AEMO) or a system operator.
5) load interruptions caused by a failure of the shared transmission network.
6) load interruptions caused by a failure of transmission connection assets except where the interruptions were due to inadequate planning of transmission connections and the DNSP is responsible for transmission connection planning.
7) load interruptions caused by the exercise of any obligation, right or discretion imposed upon or provided for under jurisdictional electricity legislation or national electricity legislation applying to a DNSP.

Exclusions

Preparation Methodology:

Using the Network Outage Summary report (obtained from Poweron Fusion), all Transmission, selected TFB-related events, inter-DB connection failures and REFCL- related outages from pre-conditioning tests were identified.

A summary of these events was then created by event date and sequence of occurrence. For each feeder affected, the number of customer interruptions ("CI") and CMOS was summated.

The average interruption duration was calculated by dividing CMOS with CI for each event.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Basis of Preparation

6.9 STPIS GSL

The applicable GSL scheme for AusNet Electricity Services is the scheme included in the Victorian Electricity Distribution Code. This GSL scheme is referred to as the 'jurisdictional GSL scheme' in the reporting template. The AER GSL scheme does not apply to AusNet Electricity Services.

Guaranteed Service Levels – Jurisdictional GSL Scheme

Preparation Methodology:

Appointments and Connections

Appointments and new connections data is recorded in AusNet Electricity Services' SAP CIS software.

'Total Connections Made' was sourced from a report generated in SAP CIS.

Within SAP CIS, the 'Review GSL Products' module holds the relevant information for the remaining Connections data reported. Once information has been entered into SAP, it is reviewed daily by the New Connections team and should a GSL entry be accepted by the team, it is manually transferred to a monthly GSL spreadsheet. Each GSL entry is assessed against the applicable criteria for awarding a GSL and can be rejected if there are defects on the customer's site, no supply at the premises, or the customer has cancelled the appointment.

Once a GSL is accepted by the New Connections team, SAP CIS interfaces with Kinetiq and adds the GSL refund to the next billing cycle. This is actioned by the Metering Revenue team.

At the end of each month, the GSL report is finalised by generating a new connection and truck appointment report in SAP, which returns the total number of connections and truck appointments for that month. Based on this, the percentage of service orders completed on time can be calculated.

To populate the RIN template a yearly extract is taken from SAP CIS and includes both Connection and Appointment GSL.

Reliability of Supply

Reliability of supply data was sourced from the DOMS system. The information was extracted using a standard report entitled 'LR Payments All Detailed'. The output of this report includes the number of GSL events for each category (e.g., flow reliability payments – 20 hours).

The number of events in each category was then multiplied by the applicable GSL payment (e.g., $120) to determine the amount paid under each GSL category.

The events that can be excluded from GSL is flagged in DOMS system. When the "LR Payments All Detailed" report is run option "Y" is selected for "Exclude GSL Exempt Events" to exclude these events.

Streetlights

This is the total number of streetlights on the network at the end of December 2020 sourced from the SDME Asset Management system.

The preparation of STPIS GSL data is documented in the AusNet Services' Public Lighting Performance Reporting Guidelines (SOP 30-04).

Basis of Preparation
2020 Regulatory Year

Streetlights "out" during period

Each month the Fusion DOMS system produces a report on the total number of faults reported during that month. An end of year report is also run to check and confirm any missing completion dates from the monthly reports. The DOMS system allows for selection of any commencement date and end date.

The total number of streetlight faults was determined by filtering the lighting report for all streetlight-specific faults reported using the 'Trouble Symptom' column including all categories except 'Found by patrol' and 'Watchman lights' for the entire year.

Data Reported in this metric relates to streetlight faults reported by a customer and does not relate to GSL eligible faults only.

It is noted that 1% of the records do not have a 'field complete date (time and date the repair was completed) populated by contractors, as well as a 'system complete date' (entered by the contract manager once the field crews return from the field). These records are discounted in the analysis as these would have a status of "In Progress" or "Awaiting."

From the remaining records, it is noted that 0.87% of records do not have a 'field complete date' (time and date the repair was completed) populated by contractors. For this data, the 'system complete date' (entered by the contract manager once the field crews return from the field) has been used to calculate the 'number of business days to repair'. Given the small volume of records, AusNet Electricity Services does not consider that this to have a material impact on data reported. Based on this, the data presented is considered Actual Information.

Streetlights not repaired by "fix-by" date.

The "fix-by" date is assumed to be the agreed date for repair of a faulty light between AusNet Electricity Services and the person that reported the fault. The Fusion DOMS report does not specifically detail this information; therefore, a value cannot be determined under this item.

Data Reported in this metric relates to streetlight faults reported by a customer and does not relate to GSL eligible faults only.

Streetlights not repaired in 2 business days.

Using the same Fusion DOMS report as above, the NMI (National Metering Identifier) column is filtered to include only calls from known customers. Then the 'Trouble Symptom' column is filtered on the 3 location categories 'Area lights Out', 'Single outside' and 'Failure adjacent'. This figure includes all faults under these 3 categories from January to December 2020. The filters applied are based on GSL eligibility criteria.

The Network (i.e., Business days) column is then filtered to remove all faults repaired in 2 days or less.

Data reported in this metric is in accordance with the Victorian Public Lighting Performance standards (e.g., GSL eligible only).

Streetlights average number of business days to repair.

This figure is assumed to be the average business days to repair faulty streetlights that were reported during 2020. This is determined by filtering the "Trouble Symptom" column in the Fusion DOMS report to remove

Basis of Preparation
2020 Regulatory Year

faults under "Found by patrol" and "Watchman lights" for each quarterly report. Then, the average "Network Days" i.e., Business days are calculated for the total time taken to repair these faults divided by the total number of faults.

Data Reported in this metric relates to streetlight faults reported by a customer and does not relate to GSL eligible faults only.

Number and dollar value of GSL payments

The number of payments to public residents who qualify for a missed GSL is determined by reviewing the data obtained from the Fusion DOMS report and this is provided by AusNet Electricity Services to its public lighting contractor for confirmation. Each outage not rectified within 2 business days is reviewed and if the information provided aligns with the criteria in the Public Lighting Code, the GSL is considered payable.

The number of GSLs paid is multiplied by the mandated $25.00 GSL payment to calculate the total GSL amount.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Basis of Preparation
2020 Regulatory Year

7.8 Avoided TUOS Payments

Avoided TUOS Payments are the payments made by AusNet Electricity Services in accordance with Clause 5.5(h) of the National Electricity Rules ("NER").

Preparation Methodology:

Data reported was populated using information from Template 9.5 TUoS. Refer to Section 9.5 for further details.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Basis of Preparation
2020 Regulatory Year

7.10 Jurisdictional scheme payments

Jurisdictional scheme has the meaning given in Clause 6.18.7A (d) of the NER.

Jurisdictional Scheme Payment is, in respect of a Jurisdictional Scheme, the amount AusNet Electricity Services is required under the Jurisdictional Scheme obligations to:

      (a) Pay to a person;
      (b) Pay into a fund established under an Act of a participating jurisdiction;
      (c) Credit against charges payable by a person; or
      (d) Reimburse a person

less any amounts recovered by AusNet Electricity Services from any person in respect of those amounts other than under the NER.

Preparation Methodology:

Data was sourced from the billing system.

Solar tariff codes are used for the feed-in schemes for which AusNet Electricity Services is responsible for providing rebates – Premium feed-in tariff payments ("PFIT"). Data reported was calculated as the sum of billed volumes in the respective PFIT tariff codes multiplied by the relevant cents per kilowatt hour rate.

Estimated Information:

All information reported is Actual Information. No estimates were required.

Basis of Preparation
2020 Regulatory Year

7.11 Demand management incentive scheme

DMIA expenditure in the regulatory reporting year

<u>Preparation Methodology</u>:

Relevant projects were identified by a subject matter expert ("SME"). Project costs reported were extracted from SAP reports. Capital Expenditure reported is gross Capex, inclusive of overheads and finance costs. Opex expenditure reported is gross Opex.

<u>Estimated Information:</u>

All information reported is Actual Information. No estimates were required.

Basis of Preparation
2020 Regulatory Year

7.12 Safety and bushfire related expenditure

For the 2020 Regulatory Year, the Safety and Bushfire Template has been completed based on Safety Augmentation expenditure that was approved in the 2016-2020 Distribution Determination.

Table 7.12.1 - Safety and Bushfire related Asset Group Definitions and Allocation Basis

Preparation Methodology:

The relevant Safety and Bushfire projects were identified using information from the SAP Financial System. This data was classified into activities based on the nature of the project.

Where there were no relevant projects approved as Safety Augmentation in the Distribution Determination, definitions have been stated as "NA".

7.12.2 – Bushfire Related

7.12.2.1 – Number of Activities

Preparation Methodology:

Volumes were sourced from the Category Analysis RIN for Repex (SAP Project data), unit rates validated by a SME was used to derive the Augex volume data by dividing the as-incurred capex.

For the REFCL Programme, volumes are based on completed units i.e. when the job is completed. Hence the unit rates reported are not reflective of the underlying unit rates.

Estimated Information:

Data reported is considered Estimated Information as forecast or estimated unit rates have been used in some circumstances to derive 2020 units. AusNet Electricity Services is continuing with changes to its processes to capture the data in the categorisation required.

7.12.2.2 – Expenditure

Preparation Methodology:

Expenditure was sourced from the SAP Financial System based on project data. Projects were classified into categories based on the knowledge of an SME. Related Party Margins were obtained from the SAP Financial System and from the workings to the Annual Regulatory Accounts.

Expenditure associated with Government Funded Projects (e.g. the Powerline Replacement Programme) was excluded from the data reported as there was no specific Table requirement.

Estimated Information:

Data reported is considered Actual Information, no estimates were required.

7.12.2.3 – Unit Costs

Preparation Methodology:

Unit costs were derived using the data reported in Tables 7.12.2.2 and 7.12.2.1. Unit costs reported are exclusive of Margins and Overheads.

Estimated Information:

Data reported is Estimated Information as the unit cost calculation relied on units/volumes that were estimated. AusNet Electricity Services is continuing with changes to its processes to capture the data in the categorisations required.

Tables - 7.12.2.4 and 7.12.2.5

Preparation Methodology:

Data reported in Tables 7.12.2.4 and 7.12.2.5 relates to the REFCL Programme (Tranche 1-3) and is consistent with the Volumes and Expenditure reported in 7.12.2.1 and 7.12.2.2. The 'Volume approved under contingent project applications' was sourced from the Contingent Project Application.

Estimated Information:

Expenditure reported in table 7.12.2.5 is Actual Information as project costs which are extracted from SAP reports are directly allocated to REFCL programme activities. Data reported in 7.12.2.4 is Estimated Information as the unit cost calculation relied on units/volumes that were estimated. AusNet Electricity Services is continuing with changes to its processes to capture the data in the categorisations required.

7.12.3 - Safety Related

7.12.3.1 – Number of Activities

Preparation Methodology:

Volumes were sourced from the Category Analysis RIN (based on Asset Management System information and project data) and, in some circumstances, units were derived using the Distribution Determination unit rates.

Estimated Information:

Data reported is considered Estimated Information as, in some circumstances, units were derived using unit rates from the Distribution Determination. AusNet Electricity Services is continuing with changes to its processes to capture the data in the categorisations required.

7.12.3.2 – Expenditure

Preparation Methodology:

Expenditure was sourced from the SAP Financial System based on project information. Projects were classified into categories based on the knowledge of an SME. Related Party Margins were obtained from the SAP Financial System and from the workings to the Annual Regulatory Accounts.

Basis of Preparation
2020 Regulatory Year

Estimated Information:

Data reported is considered Actual Information. No estimates were required.

7.12.3.3 Unit Costs

Preparation Methodology:

Unit costs were derived using the data reported in tables 7.12.3.2 and 7.12.3.1. Unit costs reported are exclusive of Margins and Overheads.

Estimated Information:

Data reported is considered Estimated Information as the unit rate calculation relied on units/volumes that were estimated. AusNet Electricity Services is continuing with changes to its processes to capture the data in the categorisations required.

7.12.4 - Safety improvement outcomes reported to ESV (volumes)

Preparation Methodology:

Volumes were obtained from data reported to ESV, ultimately sourced from the SAP Financial System.

Estimated Information:

Data reported is considered Actual Information. No estimates were required.

Basis of Preparation
2020 Regulatory Year

8.1 Income

The accounting terms used in this template have the same meaning as is used for the preparation of the AusNet Electricity Services Pty Limited's SPFR. The service classifications have the same meaning as those used in the Distribution Determination.

Preparation Methodology:

All amounts reported were extracted from SAP General Ledger accounts, billing information or from other templates within the 2020 Regulatory Accounts, except as detailed below:

- *Pass through revenue (F-factor) F-Factor revenue* is recovered by AusNet Electricity Services via the addition of approved pass-through tariffs to DUOS prices. The approved pass-through amount has been adjusted to reflect the difference between AusNet Electricity Services' 2020 Annual DUOS Revenue Target and the actual DUOS revenue received to determine the total amount of F-Factor revenue earned in 2020. This calculation is performed to take account of differences between forecast and actual volumes delivered."
- *Public Lighting Revenue*: The categorisation of public lighting revenue between Efficient and Non-Efficient was based on an analysis of the descriptions of the amounts billed.
- *Depreciation Expense:* Depreciation reflects the approved 'return of capital' allowance for the period (per the Distribution Determination). These figures have been adjusted for CPI. Depreciation for Alternative Control Services – Connection services is calculated at 4% per annum.
- *Finance Charges:* Charges were obtained via weighting the actual debt raising costs from the General Ledger across networks, based on the Regulated Asset Base ("RAB") value of each network.

The 'Adjustments' column is the difference between the Audited SPFR amounts and Distribution Business amounts. These differences arise due to the following:

Various adjustments are made to the audited SPFR that differ from recognition or measurement requirements of Australian Accounting Standards, to arrive at the AusNet Electricity Services distribution business' regulatory amounts, reflecting the AER's RIN submission guidelines.

The adjustment column is part of a reconciliation required by the notice. Refer to section 1(c) of Schedule 1 of the AusNet Electricity Services' submission for this reconciliation.

Estimated Information:

The weighting process applied to Finance Charges results in the information being considered Estimated Information as the data is based on system generated information, for which there isn't an alternative approach that provides a materially different position. The AusNet Services Group has a common funding vehicle utilised for all entities within the Group and as such funding requirements are managed at the group level. As funding is not deemed to be associated with any specific entity, AusNet Electricity Services has allocated debt raising costs using RAB weightings of the entities within the Group.

Basis of Preparation
2020 Regulatory Year

8.2 Capex

Capital Expenditure ("Capex") includes all costs that are directly attributable to bringing an asset to the location and condition necessary for it to be capable of operating in the manner intended by management. In accordance with the AER approved CAM, AusNet Electricity Services capitalises overhead expenditure that is directly attributable to bringing an asset to its intended in-service state.

Capex and capital contributions data were extracted from SAP by work code and project and populated into an excel based capex model. The data extracted included details of direct costs, overheads and capitalised finance charges. Projects were classified into Asset Classifications based on work codes with an experienced SME review. Capital Contributions reported includes in kind, gifted assets and the accounting-based recognition of cash customer contributions.

Table 8.2.1: Capex by Purpose - Standard Control Services and Table 8.2.3 Capex Other

Preparation Methodology:

Information in the Capex Model was used to populate the 'Actual' column in Tables 8.2.1 and 8.2.3.

In Table 8.2.1 Augmentation, Connections, Replacement and Non-Network costs reported are direct costs including related party margins, capital contributions but, exclude capitalised overheads. AusNet Electricity Services capitalises a proportion of its overheads. These overheads are calculated using multiple drivers that isolates a portion of overheads that are capital in nature. These overheads are divided by the distribution capex direct costs to form a percentage. This percentage is applied to the direct costs of the distribution capex that forms the capitalised overheads. Capitalised overheads and capital contributions are shown separately. Capital contributions are deducted from the total SCS Capex reported.

In Table 8.2.3 Alternative Control Services costs reported are direct costs including any related party margins and overheads, excluding (net of) capital contributions and gifted assets.

Related parties are defined in the RIN instructions. Information reported in the 'Related Party Margin' column is based on a SAP report of related party transactions which was classified into Asset Categories using project data. The related party margin is prescribed in contracts. The prescribed contract margin was applied to the total related party costs to determine the margin. AusNet Electricity Services also has related party transactions within the AusNet Services Group; however, these transactions are at zero margin.

To determine the voltage allocations (excluding REFCL), capex data sourced from AusNet Electricity Services' Category Analysis RIN templates was used. REFCL was allocated based on the advice of a SME.

Estimated Information:

The 'Actual' column is considered Actual Information. The assignment of the Augmentation, Connections, Replacement and Capitalised Overheads into the prescribed voltages except for Non-Network in Table 8.2.1 is estimated information, as the data sourced from the Category Analysis RIN which was based on estimated information (The detailed estimation methodology for each of these categories is stated in the Category Analysis RIN). Related party margin information is estimated because the 'at risk' margin was proportionally allocated over Capex projects delivered by Zinfra. However, Management considers this its best estimate based on the data available. As table 8.2.3 cannot be categorised into the Subtransmission, HV and LV, AusNet Electricity have disclosed the amounts in the 'Other' column.

Basis of Preparation
2020 Regulatory Year

Table 8.2.4: Capex by Asset Class

Preparation Methodology:

'Actual' capex costs reported are direct costs including any related party margins and overheads excluding capital contributions (net of capital contributions).

The 'Actual' column is derived as follows:

- SCADA/Network Control:
    - This classification includes REFCL and Non-REFCL Capex data.
    - Non-REFCL Capex data was obtained from Table 8.2.1.
    - REFCL Capex relating to SCADA/Network Control comprises 2 components:

    1) Cost of REFCL Coil units. This was obtained from a SAP Materials Order report for the coil supplier. The SAP report was generated for calendar year 2020 and provided the cost of all coil materials in Euros. The average exchange rates ($EUR to $AUD) were able to be derived from the SAP reports. Capitalised overheads were added to the direct material cost by applying the capitalised overhead percentage.

    2) An accrual for GFN Coil Material Orders that have not yet been delivered has been incorporated in the REFCL amount. This includes the reversal of a manual adjustment from the CY19 regulatory accounts for tranche 2 material costs (Swedish Neutral material order) offset by an accrual processed in December in SAP for tranche 1 REFCL compliance works (Siemens Trench material order). Capitalised overheads were added to the direct material cost by applying the capitalised overhead percentage.

    3) REFCL Capex also includes 'Other SCADA & Comms'. This was obtained for work undertaken at 23 Zone Substations across all REFCL tranches (1,2&3). A report was generated from SAP containing total costs for Zone Substations projects only. The approved Other SCADA & Comms amounts were taken from the respective AER decisions by station (covering 22 sites in total) and divided into the total approved amounts per station works. Refer to sheets 'T1 Allowance – Stations', 'T2 Allowance – Stations' and 'T3 Allowance – Stations' within the excel workbook. These splits were then applied to total CY20 actual costs incurred by station and by tranche using the SAP report data.

    In addition, the portion of 'other SCADA & Comms' costs were determined for another project which is not funded by the approved allowances for REFCL tranche 2. This project involves the establishment of a new zone substation at Rowville East (RVE) which is currently in build phase. Actual costs incurred against the project were sourced from SAP for CY20. The portion of costs relating to other SCADA & Comms was derived using a materials transaction report from SAP (actuals) and an allocation of design service costs for secondary works (protection and control). Refer to sheet 'T2 RVE ZSS' in the excel workbook.

Basis of Preparation
2020 Regulatory Year

Capitalised overheads were added onto the direct material cost by applying the capitalised overhead percentage.

- Non-Network IT & General Assets:
    - There were no substation land purchases in CY20 as part of the REFCL Capex program.
    - Actual REFCL related IT costs incurred in CY20 were sourced from the REFCL ICT capital project in SAP. Actual capitalised overheads incurred on the project in CY20 were added to direct costs.

- Subtransmission:
    - This classification includes REFCL and Non-REFCL and Capex data.
    - Non-REFCL Capex data was obtained from Table 8.2.1; and
    - Once cost allocations are known for SCADA/Network Control and Non-Network IT & General Assets then all remaining costs for Zone Substations works is considered 'Subtransmission'. This principle applies to all 3 tranches in the REFCL Program. For all other works delivered outside of Zone Substations, including HV feeder works, network balancing, line hardening, etc., these costs are all considered 'Distribution System Assets'.

- Distribution System Assets:
    - This was calculated as Total Capex less the amounts allocated other Asset Classes (described above).

In relation to Provisions, a provision movement schedule was prepared for each provision based on information extracted from SAP. The 'Movement in Provisions' was allocated into SCS, Metering, Alternative Control Services and Unregulated services using the percentage split of total operating costs per Template 8.4 Opex. Only the Provision movement attributed to SCS has been reported in 8.2 Capex. The movement was then allocated into Capex and Operating Expenditure ("Opex") components using the results from the indirect cost allocation methodology process.

The Capex SCS movement in Provisions was allocated across Asset Categories based on the capex expenditure weighting disclosed in the 'Actual' column of Table 8.2.4.

Estimated Information:

Non-Network General Assets IT, Non-Network General Assets Other and Non-network Leasehold Land & Buildings are considered Actual Information. All other data reported is Estimated Information due to the preparation process outlined above. This is considered Management's best estimate based on information available.

The 'Movements in Provisions' are considered Estimated Information as SAP does not capture provision movements on an Opex/Capex basis and not in the required Asset Categories. The allocation process applied is considered Management's best estimate based on the data available. Due to the nature of the data required (which is not required under Accounting Standards), it is anticipated that this will be estimated on an ongoing basis.

Table 8.2.5: Capital contributions by asset class

Preparation Methodology:

Basis of Preparation
2020 Regulatory Year

Capital Contributions were determined using an SAP Report, classified into Asset Categories based on the cost weightings in Table 8.2.1. No capital contributions are received in relation to SCADA or Non-Network assets.

Estimated Information:

Total Capital Contributions is considered Actual Information as the data was sourced from SAP. The categorisation into Subtransmission, Distribution System Assets is estimated information by virtue of the allocation process. This is considered Management's best estimate based on available data.

Table 8.2.6: Disposals by asset class

Disposals are defined as the gross proceeds from the sale of assets.

Preparation Methodology:

To determine 'Actual' values, a transaction listing was generated in SAP of the General Ledger account for asset sales and retirements. This was reviewed and the relevant disposals were identified and classified.

Estimated Information:

Information reported is Actual information. No estimates were required.

8.4 Opex

Opex is the costs of operating and maintaining the network (excluding all capital costs and capital construction costs).

Standard Control Services and Alternative Control Services ("ACS") are as defined in the 2016-2020 Distribution Determination.

AusNet Electricity Services allocates costs directly to projects, assets and services where possible and appropriate. Where costs are not directly project costed, an indirect cost allocation methodology process is used to allocate costs across projects, assets and services. This is in accordance with the AER approved CAM.

Table 8.4.1 Opex

Preparation Methodology:

Information reported as 'Audited Statutory Accounts' was determined using information in Template 8.1 Income and based on information in the 'Distribution Business' column.

Data reported in the 'Distribution Business' was calculated as the sum of SCS and ACS Opex in Table 8.4.1.

SCS Opex data was extracted from SAP by work code and project and classified into Opex Categories using work code and project data.

For ACS Opex, the following preparation approaches were applied -

Basis of Preparation
2020 Regulatory Year

- *Public Lighting:* Data was extracted from SAP based on work codes and projects. The information was allocated into Efficient and Non-Efficient based on the proportion of Efficient and Non-Efficient Revenue.
- *Metering:* Metering data was extracted from SAP based on work codes and projects. Data was then subject to SME review.
- *Ancillary Network Services:* Metering data was extracted from SAP based on work codes and projects. Data was reviewed by a SME.

Estimated Information:

The methodology to allocate total Public Lighting Opex into Efficient Public Lighting and Non-Efficient Public Lighting is not considered to represent Estimated Information. This is based on materiality as there isn't an alternative approach available which would provide materially different data. Related party margin information in table 8.4.2 is estimated because the 'at risk' margin was proportionally allocated over Capex projects delivered by Zinfra.

Basis of Preparation
2020 Regulatory Year

9.5 TUoS Audit (t-2)

Preparation Methodology:

'TUOS charges (AEMO)' was populated based on AEMO monthly invoices.

To populate the table 'Transmission connection fees', a listing of connection fees was sourced from AusNet Services SAP financial system. No adjustments were required to be made to the fees.

Data reported as 'Cross boundary network charges' was sourced from invoices and supporting files.

- HV Crossings are receipts/payments for energy transferred utilising AusNet Services' HV and LV line assets /AusNet Services utilising other businesses HV and LV line assets.
- Sub-transmission Crossings are payments/receipts for the sub-transmission assets in shared loops that support each distributor's Zone Substation capacity to ensure N-1 reliability is maintained.
- TUoS Adjustment is payments/receipts for the adjustment of TUoS paid by a distributor for energy delivered to another distribution business through a shared loop.

The amounts (payable)/receivable from United Energy (Vic) are estimates based on and equal to 2018/19 completed payments. The (payable) and receivable amount for Jemena is based on metered data for each crossing. Essential Energy has billed AusNet Electricity to June 2020. The 2020 figures are based on January to June 2020 invoices and the remaining 6 months are based on downloaded data from relevant meters and the Essential Energy rates for the relevant year. These amounts have been accrued for and therefore are considered Actual Information.

'Payments to embedded generators – avoided TUoS usage charges', the listing of projects is sourced from records of generators connected to the network. The charges for all projects are based on 6 months of Financial Year 1 July 2019– 30 June 2020 actual charges for each project as per the billing system and 6 months of Financial Year 1 July 2020 – 30 June 2021 to derive data for calendar year 2020. These amounts are considered Actual Information as there isn't an alternative approach that could be used to calculate the information reported.

Estimated Information:

Information reported is Actual information. No estimates were required.