



AER Category Analysis RIN

CitiPower Pty

Basis of Preparation documents

Part A

2 June 2014

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2.1 Expenditure

AER CATEGORY ANALYSIS RIN

Tab name: 2.1 Expenditure summary and reconciliation

Table name: 2.1.1 - Standard control services capex - capcons

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

2. RECONCILIATION AND SUMMARY TABLES

2.1 CitiPower must calculate the expenditure for each capex and opex category reported in regulatory templates 2.2 to 2.10 and 4.1 to 4.4 and report these amounts in the corresponding rows in tables 2.1.1 to 2.1.6.

2.2 The total expenditure for the capex and opex for each service classification in Regulatory Template 2.1 must be mutually exclusive and collectively exhaustive. Total expenditure for capex must be reported on an "as-incurred" basis.

2.3 CitiPower must report an amount that reconciles total capex and opex with the sum of the capex and opex line items in the "balancing item" row in each table in Regulatory Template 2.1. For the avoidance of doubt this means that the sum of each of the capex and opex line items in each of the tables in Regulatory Template 2.1 minus the balancing item must equal the total capex or opex line item in these tables. To do this the balancing item must:

- (a)** Include the amount of capex and opex reported where these expenditures have been reported more than once within the Regulatory Templates 2.2 to 2.10, and 4.1 to 4.4; and
- (b)** Account for any differences arising due to the reporting of capex on a basis other than the "as-incurred" basis.

2.4 CitiPower must provide an excel spread sheet that contains the calculation of balancing items reported in Regulatory Template 2.1. At a minimum, this spread sheet must:

- (a)** for each instance where an expenditure item is reported more than once (i.e. Double counted), identify:
 - (i)** where that instance is reflected in expenditure included in the Regulatory Templates
 - (ii)** the value of that expenditure in each Regulatory Template
- (b)** identify each instance where the Notice requires CitiPower to report capex not on an "as-incurred" basis in Regulatory Templates 2.2 to 2.10 and, for the relevant expenditure item, list its corresponding value when expressed on an "as incurred" basis.

2.5 CitiPower must provide a reconciliation between the total capital and operating expenditure provided in the Regulatory Template 2.1 to the capital and operating expenditure recorded

Please provide a Response in this box:

The data for the customer contributions expenditure for the years 2009-2013 has been reported on an 'as incurred' basis and is consistent with that reported in the annual RIN's for those years. Note that contributions have been stated excluding gifted assets in accordance with the requirements of this RIN.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL**¹ data green; and **ESTIMATED**²/derived data red

¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

² 'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response: The data for the customer contributions expenditure for the years 2009-2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	The SAP financial system is used to extract the information required to state the DNSP customer contribution information by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments in accordance with the cost allocation methodology. Information presented in this table excludes gifted assets and relates to standard control services only.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	No estimated data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	No estimated data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No estimated data

accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.1 Expenditure summary and reconciliation

Table name: 2.1.5 - Dual function assets capex - all
2.1.6 - Dual function assets opex - all

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

2. RECONCILIATION AND SUMMARY TABLES

2.1 CitiPower must calculate the expenditure for each capex and opex category reported in regulatory templates 2.2 to 2.10 and 4.1 to 4.4 and report these amounts in the corresponding rows in tables 2.1.1 to 2.1.6.

2.2 The total expenditure for the capex and opex for each service classification in Regulatory Template 2.1 must be mutually exclusive and collectively exhaustive. Total expenditure for capex must be reported on an "as-incurred" basis.

2.3 CitiPower must report an amount that reconciles total capex and opex with the sum of the capex and opex line items in the "balancing item" row in each table in Regulatory Template 2.1. For the avoidance of doubt this means that the sum of each of the capex and opex line items in each of the tables in Regulatory Template 2.1 minus the balancing item must equal the total capex or opex line item in these tables. To do this the balancing item must:

- (a)** Include the amount of capex and opex reported where these expenditures have been reported more than once within the Regulatory Templates 2.2 to 2.10, and 4.1 to 4.4; and
- (b)** Account for any differences arising due to the reporting of capex on a basis other than the "as-incurred" basis.

2.4 CitiPower must provide an excel spread sheet that contains the calculation of balancing items reported in Regulatory Template 2.1. At a minimum, this spread sheet must:

- (a)** for each instance where an expenditure item is reported more than once (i.e. Double counted), identify:
 - (i)** where that instance is reflected in expenditure included in the Regulatory Templates
 - (ii)** the value of that expenditure in each Regulatory Template
- (b)** identify each instance where the Notice requires CitiPower to report capex not on an "as-incurred" basis in Regulatory Templates 2.2 to 2.10 and, for the relevant expenditure item, list its corresponding value when expressed on an "as incurred" basis.

2.5 CitiPower must provide a reconciliation between the total capital and operating expenditure provided in the Regulatory Template 2.1 to the capital and operating expenditure recorded

Please provide a Response in this box:

The definition of a dual function asset is 'an asset which operate between 66 kV and 220 kV and which operate in parallel, and provide support, to the higher voltage transmission network'.
CitiPower does not own such dual function assets.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³ data green**; and **ESTIMATED⁴/derived data red**

³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response: The definition of a dual function asset is 'an asset which operate between 66 kV and 220 kV and which operate in parallel, and provide support, to the higher voltage transmission network'. CitiPower does not own such dual function assets.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	CitiPower does not own such dual function assets.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	No estimated data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	No estimated data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No estimated data

purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

2.2 Repex

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.1 - COST METRICS BY ASSET CATEGORY 2.2.2 - DESCRIPTOR METRICS	
Asset Group	Asset Category
Asset replacements	Poles Pole Top Structures Overhead Conductors Service Lines Switchgear (HV Fuses and Surge Diverters)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

- (a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 22 indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.
- (b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.
- (c) In instances where CitiPower considers that both the prescribed asset group categories and the sub-categorisation provisions set out in (a) do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions. CitiPower must ensure that the sum of the individual asset categories, including any additional subcategory, additional other asset category or asset refurbishment/ life extension asset category expenditure reconciles to the total expenditure of the asset group.
- (d) CitiPower must ensure that the replacement volumes by asset group is equal to the applicable replacement volume data provided in table 2.2.2.
- (e) CitiPower must ensure that the sum of the asset group replacement expenditures is equal to the total replacement expenditure contained in regulatory template 2.1.
- (f) If CitiPower has provided estimated expenditure data on the basis of historical data that has included works across asset groups CitiPower must provide the asset age profile data in regulatory template 5.2 against the most elementary asset category. For example, where CitiPower replaces pole-mounted switchgear in conjunction with a pole-top structure it must report the asset age profile data against the relevant switchgear asset category. CitiPower must provide documentation of instances where backcast unit costs generated have involved allocations of historical records that include expenditure across asset groups.

5.2 Table 2.2.2 instructions:

- (a) CitiPower must provide total volume of assets currently in commission and replacement volumes of certain asset groups by specified aggregated metrics. In instances where this information is estimated CitiPower must explain how

it has determined the volumes, detailing the process and assumptions used to allocate asset volumes to the aggregated metrics.

Please provide a Response in this box:

The physical and financial data for Poles, Pole Top Structures, Overhead Conductors, and Service Lines have been provided in the requested categories.

A sub-category was created under switchgear called "Distribution Fuse / Surge Diverter units" as this expenditure did not fit within the existing sub-categories. Age profile data has been provided in table 5.2 for this new sub-category.

A sub-category was created under "Other by: DNSP Defined", called "Pole Chemical Treatment" as this expenditure did not fit within the existing sub-categories. The age profile data for this sub-category aligns with the age profile for wooden poles.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵ data green**; and **ESTIMATED⁶/derived data red**

The following sub category expenditure have been estimated, Poles (excluding staking), Pole Top Structures (excluding zero values) as costs are not captured at these sub-category levels.

The following sub-category physicals have been estimated, Service Line cct length, and Overhead Conductor route km's replaced, as these were not captured.

2009	2010	2011	2012	2013
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The remaining category and subcategory information is based on actual data

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

- All Physical and financial data have been sourced from CitiPower's SAP system
- Table 2.2.2 – Feeder Categories have been sourced from CitiPower's OMS system

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
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⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	Methodology & Assumptions
2009	<p>Table 2.2.1 – Asset Replacement Data All replacement data was sourced directly from SAP.</p> <ul style="list-style-type: none"> • Alignment to Category Analysis highest voltage by material: (Poles) SAP does not specify the voltage of the pole that requires attention, for this reason the pole voltages were derived from the highest voltage attached to the pole. • Alignment to Category Analysis Customer Type and Connection complexity : (Service Lines) The customer type or connection complexity is not stored in the SAP notification, it is anticipated that the majority of replacements are residential, for this reason it was assumed that all Service Line replacements were residential simple. • Alignment to Category Analysis circuit length: (Service Lines) The length of a service line replaced is not captured in any system. An average service length was calculated (15m) from the total km installed provided in table 5.2.1 – Asset Age Profile divided by the number of Service lines recorded in SAP. To estimate the circuit length of the Service Lines replaced, this figure was then multiplied by the number of service lines replaced from SAP. <p>Table 2.2.1 – Expenditure Data Expenditure is captured at project level, a project may contain 1 item or a mix of different items, and therefore it is not possible to report accurately on the cost of individual items. Bottom up site estimates and actual overall expenditure were used to derive sub-category expenditure for Poles (excluding staking) and Pole Top Structures respectively.</p> <p>Based on the estimators experience the following assumptions were applied:</p> <ul style="list-style-type: none"> • Bottom up estimate contains site based direct costs only, materials, labour and contract costs. • These rates include an estimated design time allowance but do not include for any project management time. All design costs assumed to be internal design resources. There is no allowance for travel time, risk, or overheads. • All prices are for replacement tasks, using SAP technical standards and standard labour data, where possible live line rates have been used. <p>Estimated Expenditure: (Poles) Based on the estimators experience the following assumptions were applied:</p> <ul style="list-style-type: none"> • Poles are replaced like for like in same location, • 70% of new poles would be Wood, the remaining 30% Concrete, • 70% of the new structures would be inter/angles, the remaining 30% strain/termination structures, • 20% of pole replacements would require stay wire replacement • There is no allowance for any rock excavation. • Assumed that Steel Pole (<=1 KV)'s unit cost is the same as the unit cost for Wood Pole (<=1 KV). • The AG Pole unit cost has been assumed to be Single-Wire Earth Return (SWER). • Estimated Expenditure: (Pole Top Structures) <p>Based on the estimators experience the following assumptions were applied:</p> <ul style="list-style-type: none"> • 1 in 10 LV pole top structure replacements include fuse/isolator replacement, • 1 in 15 HV pole top structure replacements include a switch replacement. • Single circuit for all voltages of pole top structure replacement, • 1 in 100 66kV pole top structure replacements include an isolator replacement. <p>Table 2.2.2 – Asset Replacement Data All replacement data was sourced directly from SAP.</p> <ul style="list-style-type: none"> • Alignment to Category Analysis Poles by Feeder Type: (Poles) SAP does not specify the Feeder Type of the pole that requires attention, for this reason the OMS feeder types were used to derive the poles by feeder category. • Alignment to Category Analysis Poles by Feeder Type: (Pole top Structures) SAP does not record whether the Pole Top Replacement in the AER categories '> 1 KV & < = 11 KV' and '> 11 KV & < = 22 KV' are single phase or three phase for this reason their unit costs have been assumed to be the average of the unit cost for a single phase pole top and a three phase pole top.
2010	Refer 2009
2011	Refer 2009

Year	Methodology & Assumptions
2012	Refer 2009
2013	Refer 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why was an estimate required, including why it is not possible to use actual data;
2009	<p>Table 2.2.1 – Reason for estimate – Expenditure Data</p> <p>Poles by Highest Voltage & material:</p> <ul style="list-style-type: none"> Expenditure is captured at project level, a project may contain 1 item or a mix of different items, and therefore it is not possible to report accurately on the cost of individual items. Pole replacement costs are not captured by material and/or voltage within the SAP system. <p>Pole Top Structures by complexity:</p> <ul style="list-style-type: none"> Expenditure is captured at project level, a project may contain 1 item or a mix of different items, and therefore it is not possible to report accurately on the cost of individual items. Pole Top Structure replacement costs are not captured by material and/or voltage within the SAP system <p>Overhead Conductors by highest operating voltage and number of phases:</p> <ul style="list-style-type: none"> Not all expenditure in this area is captured at a single project level, some projects may contain a mix of different defect items, and therefore it is not possible to report accurately on the cost of individual items. Between 2009 and 2011 Overhead conductor replacement costs are mixed with U/G cable replacement costs. <p>Table 2.2.1 – Reason for estimate – Physical Data</p> <p>Service Lines by connection voltage, customer type, and connection complexity:</p> <ul style="list-style-type: none"> cct length of Service Lines replaced is not captured within SAP, neither SAP or GIS record the actual Service line length of individual services.
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Table 2.2.1 – Basis for estimate – Expenditure Data</p> <p>Poles by Highest Voltage & material: Using the known physicals by voltage and material, the total expenditure, and a bottom up estimate of a site cost per unit by voltage and material the expenditure per category was derived.</p> <p>The Wood Pole (<1KV) is anticipated to be the closest equivalent to the Steel Pole (<=1KV)</p> <p>The Single-Wire Earth Return (SWER) pole is anticipated to be the closest equivalent to the AG Pole</p> <p>Pole Top Structures by complexity: Using the known physicals by voltage and material, the total expenditure, and a bottom up estimate of a site cost per unit by voltage and material the expenditure per category was derived.</p> <p>Single rates for the AER categories '> 1 KV & <= 11 KV' and '> 11 KV & <= 22 KV' were derived using an average of the bottom up estimate for single and three phase units.</p> <p>Overhead Conductors by highest operating voltage and number of phases: Using known physicals and costs from certain projects the expenditure per category was derived.</p>

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
	<p>Table 2.2.1 – Basis for estimate – Physical Data</p> <p>Service Lines by connection voltage, customer type, and connection complexity: It is anticipated that the majority of replacements are residential, for this reason it was assumed that all Service Line replacements were residential simple.</p> <p>An average service length was derived using the total route length of service cable installed divided by number of Aerial Services installed.</p>
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	<p>Table 2.2.1 – Reason for selected approach – Expenditure Data</p> <p>Poles by Highest Voltage & material, and Pole Top Structures by complexity The approach used allows a site cost estimate to be developed, by using this as a base, along with the actual physicals and actual expenditure an average cost can be calculated which allows other costs such as travel etc. to be averaged across each pole</p> <p>Overhead Conductors by highest operating voltage and number of phases: Is actual project costs</p> <p>Table 2.2.1 – Reason for selected approach – Physical Data</p> <p>Service Lines by connection voltage, customer type, and connection complexity: Given that the length of service line replaced is not captured in any system, multiplying the number of service lines replaced by the average service line length will provide the most appropriate answer.</p>
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

Physical data for, Poles, Pole Top Structures, Overhead Conductors, and Distribution Fuse/Surge Diverter units.
Financial Data for Poles (Staking), Overhead Conductors, Service Lines, Zero expenditure all categories.

2009	2010	2011	2012	2013

Physical Data for Service Lines cct length replaced
Financial Data (excluding zero values) for Poles (excluding staking), Pole Top Structures

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.1 - Replacement Expenditure, Volumes & Asset Failures by Asset Category	
Asset Group	Asset
Asset Failures	Poles Pole Top Structures Overhead Conductors & Underground Cables Overhead and Underground LV Service Lines Switchgear (HV Fuses and Surge Diverters)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

APPENDIX E: PRINCIPLES AND REQUIREMENTS

5. REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 22 indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.

APPENDIX F: DEFINITIONS

Asset failure (repex)

The failure of an asset to perform its intended function safely and in compliance with jurisdictional regulations, not as a result of external impacts such as:

- Extreme or atypical weather events; or
- Third party interference, such as traffic accidents and vandalism; or
- Wildlife interference, but only where the wildlife interference directly, clearly and unambiguously influenced asset performance; or
- Vegetation interference, but only where the vegetation interference directly, clearly and unambiguously influenced asset performance.
- Excludes planned interruptions.

Poles

These are vertically oriented assets that provide load bearing structural support for overhead conductors or other lines assets.

- This also includes associated pole top structures, such as cross-arms and insulators where these are replaced in conjunction with a pole replacement project
- It excludes other pole mounted assets that are included in any other asset group, notably pole mounted substations and pole mounted switchgear such as links, fuses, air break switches etc.

Pole top structures

These are horizontally oriented structures and the attached components that provide support for overhead conductors and related assets to be supported on a pole and provide adequate clearances.

- This relates to expenditure incurred when a pole top structure is replaced independently of the pole it is located on.
- This includes cross-arms and insulators.
- It excludes any pole mounted assets that are included in any other asset group, notably pole mounted substations and pole mounted switchgear such as links, fuses, air break switches etc.

Overhead conductors

These assets have the primary function of distributing power, above ground, within the distribution network.

- It excludes any pole mounted assets that are included in any other asset group.

Underground cables

These assets have the primary function of distributing power, below ground, within the distribution network.

- This includes cable ends, joints, terminations and associated hardware and equipment (e.g. surge diverters, etc.), cable tunnels, ducts, pipes, pits.

Service lines

Includes assets that provide a physical link and associated assets between the distribution network and a customer's premises

- It excludes any pole mounted assets and meters that are included in any other asset group.
- **Overhead service wire**
 - A length of overhead conductor that runs from a distribution pole to a distribution customer's, excluding customer which are other network service providers, connection point.
- **Underground connection**
 - A physical link between the distribution system and a customer's premises running underground from a pole or service pit to the customer's premises.

Fuse

A device used in distribution networks that can break electrical connection of a load from a supply when current exceeds specified value and duration.

- For the purpose of replacement expenditure classification, switches that incorporate a fuse (fuse switches) are classified as switch.

Please provide a Response in this box:

The description of the assets below relate to asset subcategories in Table 2.2.1, which has been reconciled to the relevant higher level asset categories, as well as having clearly indicated which asset category each sub-category relates to. CitiPower defines an asset failure as the state whereby the physical asset is no longer able to perform its function to a level of performance that is acceptable to the business. This reconciles to the RIN definition which refers to an asset failure existing when an asset is no longer able to perform its intended function safely.

- CitiPower believes this aligns with the definition stated in APPENDIX F: DEFINITIONS of the CA RIN
- Reported pole failure quantities are for unassisted pole failures only. It excludes failures resulting from external factors (eg: lightning, vehicle impact, human agency, aircraft, floods, fires, falling trees, flying debris and winds in excess of design loading.)
- Reported Pole-top structure failure quantities include failed cross-arms, insulators, as well as conductor ties. It excludes failures resulting from external factors.
- Reported overhead conductor failure quantities include the failure of conductor terminations and conductor joints. It excludes failures resulting from external factors
- Reported overhead service cable failure quantities have been provided in accordance with the AER Category RIN definition of an overhead service cable.
- Reported underground service cable failure quantities have been provided in accordance with the AER Category RIN definition of an underground service cable.
- Reported High Voltage fuse failure quantities exclude normal fuse operations and failures associated with damage caused by external factors.

- Reported surge diverter failure quantities exclude failures associated with damage caused by external factors or incorrect installation

This methodology meets the requirements of this Information Notice to the best of our abilities.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷ data green**; and **ESTIMATED⁸/derived data red**

For CitiPower:

Poles	2009	2010	2011	2012	2013
Pole top structures	2009	2010	2011	2012	2013
O/H conductors & U/G cable	2009	2010	2011	2012	2013
O/H & U/G services	2009	2010	2011	2012	2013
HV fuses and surge diverters	2009	2010	2011	2012	2013

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

For Pole, Pole-top Structure, Overhead Conductor, Underground Cable, Underground LV Service, HV Fuse and Surge Diverter failures, the failure data was obtained from the CitiPower SAP Asset Failure Database (AFDB).

- This database is the source for both internal and external asset failure reporting for key asset categories.
- The data is stored within the 'OA' (Outage Advice) type Notification created in SAP for the individual incident.

⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

For Overhead Service Cables, the failure data was sourced from the CitiPower Outage Management System (OMS), as this data is not available in the CitiPower SAP Asset Failure Database.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Pole failures Pole failures are recorded in the SAP Asset Failure Database</p> <ul style="list-style-type: none"> The reported quantities <u>exclude</u> Priority 1 Maintenance defects, as well as external causes such as lightning, vehicle impact, human agency, aircraft, floods, fires, falling trees, flying debris and winds in excess of design loading; where the asset is the victim and not the cause. <p>Pole-top structures Cross-arm failures are recorded in the SAP Asset Failure Database,</p> <ul style="list-style-type: none"> The reported quantities <u>exclude</u> those related to external factors and cross-arm/pole top fires. The reported quantities <u>include</u> insulator failures recorded in the SAP Asset Failure Database, which <u>exclude</u> those related to external factors. <p>The reported quantities <u>include</u> conductor tie failures recorded in the SAP Asset Failure Database, which <u>exclude</u> those related to external factors</p> <p>Overhead conductors Conductors that have failed are recorded in the SAP Asset Failure Database.</p> <ul style="list-style-type: none"> The reported quantities <u>include</u> failures associated with Low Voltage & High Voltage Aerial Bundled Cable and covered conductor. The reported quantities <u>include</u> failures of conductor terminations and joints that are under tension. The reported quantities <u>exclude</u> failures related to an external factors; conductor stranding and non-tensioned sections (e.g. bridges). Only numbers of failures are recorded in the SAP Asset Failure Database. <ul style="list-style-type: none"> In order to provide kilometres of failed conductor it is assumed that, on average, one span of conductor was involved in each failure. The number of failures was converted to km's using a factor calculated from the average of the span lengths (obtained from CitiPower's Geographical Information System, GIS). <p>Underground cables (HV & LV) The reported quantities include all underground cable failures recorded in the SAP Asset Failure Database</p> <ul style="list-style-type: none"> Only numbers of failures are recorded in the SAP Asset Failure Database The number of failures was converted to km's by multiplying by: <ul style="list-style-type: none"> > 0.006 which reflects the average repair length of 6 metres (obtained from expert knowledge) for LV and other underground cables > 0.007 which reflects the average repair length of 7 metres (obtained from expert knowledge) for HV underground cables <p>Overhead service cables The reported quantities <u>include</u> all service cables failures recorded in the CitiPower Outage Management System (OMS), <u>except</u> if the OMS record contains any one, or more, of the following items:</p>

Year	Methodology & Assumptions
	<ul style="list-style-type: none"> • Cause equal to <ul style="list-style-type: none"> ○ 'Non-network outage' ○ 'Planned Outage' • Sub-cause equal to: <ul style="list-style-type: none"> ○ 'False Call' ○ 'OK on arrival' ○ 'Other Auth asset' ○ 'Other Auth asset (Optus etc)' • Repair Action equal to: <ul style="list-style-type: none"> ○ 'Fault Follow Up 18 Weeks' ○ 'Fault Follow Up 28 Days' ○ 'Fault Follow Up 5 Days' ○ 'Inspected OK' ○ 'No Action' ○ 'No Attendance' ○ 'Ok On Arrival' ○ 'Refer on customer' ○ 'Refer on inspection' ○ 'Refer on investigation' ○ 'Refer on Other Authority Asset' ○ 'Refer on repair' ○ 'Referred On' ○ 'Referred PCS' • Damage equal to: <ul style="list-style-type: none"> ○ 'Hazard on line' ○ 'OK on arrival' ○ 'Lack of clearance from structure' ○ 'Lack of Ground Clearance' • Root cause (all external factors), equal to: <ul style="list-style-type: none"> ○ 'Animal' ○ 'Bark' ○ 'Bird' ○ 'HV Injection' ○ 'Lightning' ○ 'Other Authority Asset' ○ 'Third party' ○ 'Tree' ○ 'Vandalism' ○ 'Vehicle impact' ○ 'Weather' <p>Only <u>numbers</u> of failures are recorded in OMS.</p> <ul style="list-style-type: none"> • In order to provide kilometres of failed overhead service cable it is assumed that, on average, one span of service cable was involved in each failure. • The number of failures was converted to km's by multiplying by 0.015 which reflects the average overhead service span length of 15 metres (obtained from CitiPower's GIS). <p>Underground service cables</p> <p>The reported quantities <u>include</u> all underground service cables failures recorded in the SAP Asset Failure Database</p> <ul style="list-style-type: none"> • Only numbers of failures are recorded in the SAP Asset Failure Database • The number of failures was converted to km's by multiplying by 0.017 which reflects the average underground service cable length of 17 metres (obtained from CitiPower's GIS)

Year	Methodology & Assumptions
	HV Fuses High Voltage fuse failures that are recorded in the SAP Asset Failure database <ul style="list-style-type: none"> The reported failures quantities exclude any Priority 1 Maintenance defects. Surge Diverters <ul style="list-style-type: none"> Surge diverter failures that are recorded in the SAP Asset Failure database, <u>except</u> those related to external factors, and incorrect installation)

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	Only numbers of instances of overhead conductor, overhead service and underground cable failures are recorded in the SAP Asset Failure Database.

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	Overhead Conductors and Service Cables In order to provide kilometres of failed conductor and cable it is assumed that one span of conductor or an average length of service cable was involved in each failure. The number of failures was converted to km's using a factor calculated from average span or service cable lengths obtained from CitiPower's Geographical Information System (GIS). Underground cables In order to provide kilometres of failed cable an average replacement length was estimated, using expert knowledge. The number of failures was converted to km's using average replacement lengths.

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	The use of average conductor and cables lengths was the only method available to convert failure numbers into quantities of conductor and cable replaced due to asset failures.

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Data has been provided for all the years requested

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

For CitiPower:

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.1 – Replacement expenditure, volumes and asset failures by asset category	
Asset Group	Asset Category
Underground Cables	(ALL data for Expenditure)
Transformers	(ALL data for Expenditure)
Switchgear	(ALL data for Expenditure)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Asset failure (repex) The failure of an asset to perform its intended function safely and in compliance with jurisdictional regulations, not as a result of external impacts such as:

- extreme or atypical weather events; or
- third party interference, such as traffic accidents and vandalism; or
- wildlife interference, but only where the wildlife interference directly, clearly and unambiguously influenced asset performance; or
- vegetation interference, but only where the vegetation interference directly, clearly and unambiguously influenced asset performance.

Excludes planned interruptions.

Replacement Capital expenditure —‘Repex’ - The non-demand driven capex to replace an asset with its modern equivalent where the asset has reached the end of its economic life.. Capex has a primary driver of replacement expenditure if the factor determining the expenditure is the existing asset's inability to efficiently maintain its service performance requirement.

REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 22 indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the sub-categorisation provisions set out in (a) do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions. CitiPower must ensure that the sum of the individual asset categories, including any additional subcategory, additional other asset category

or asset refurbishment/ life extension asset category expenditure reconciles to the total expenditure of the asset group.

(d) CitiPower must ensure that the replacement volumes by asset group is equal to the applicable replacement volume data provided in table 2.2.2.

(e) CitiPower must ensure that the sum of the asset group replacement expenditures is equal to the total replacement expenditure contained in regulatory template 2.1.

(f) If CitiPower has provided estimated expenditure data on the basis of historical data that has included works across asset groups CitiPower must provide the asset age profile data in regulatory template 5.2 against the most elementary asset category. For example, where CitiPower replaces pole-mounted switchgear in conjunction with a pole-top structure it must report the asset age profile data against the relevant switchgear asset category. CitiPower must provide documentation of instances where backcast unit costs generated have involved allocations of historical records that include expenditure across asset groups.

Please provide a Response in this box:

This BoP conforms to the requirements and definitions of the CAT RIN as defined in the box above.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁹ data green**; and **ESTIMATED¹⁰/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

1. Top level Summary Function Code information was sourced from the regulatory reporting accounts. The relevant function codes that relate to this analysis are those managed by the Plant and Stations group:
 - FC 143: High voltage switch replacement
 - FC 144: Transformer and S/STN enclosure replacement
 - FC 150: Underground line replacement
 - FC 154: Unplanned asset replacement – primary plant and secondary assets
 - FC 157: Zone substation primary plant replacement
2. To determine individual Category RIN Asset line allocations from this function code information, SAP Business Intelligence (BI) reports were utilised to extract Work Breakdown Structure (WBS) / project definition expenditure from within the function codes.

Financial accounting CAPEX report “**F264 CAP CP Netw Direct CAPEX**” was used for the CitiPower extraction and

Financial accounting CAPEX report “**F262 CAP PAL Netw Direct CAPEX**” was used for the CitiPower extraction.

⁹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower’s regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

¹⁰ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

The data was extracted for each year individually. Data was extracted with WBS, Order and Cost element detail available.

Note that the two data sources will not balance due to differing general ledger accounts being applied to the regulatory accounts and the CitiPower/CitiPower internal direct CAPEX reports. The BI extractions are used as a % proxy of the Regulatory Reporting totals as the regulatory totals are at the summary function code level only and do not provide sufficient data to allow mapping of expenditure to the AER RIN categories and classes. The costs provided by the BI reports against individual projects/orders are converted to a percentage of the function code total for the given year. At the conclusion of the cost allocation algorithm these percentages are then multiplied by the regulatory account totals to determine the actual expenditure.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>The purpose of this methodology is to describe the process undertaken to allocate plant replacement expenditure from CitiPower/CitiPower data structures into the data structures required by the AER.</p> <p>The Regulatory Reporting Accounts provided function code account summaries for each of the function codes. These totals were dispersed to the AER Asset Categories via the SAP BI reporting data.</p> <p>The SAP BI reporting data for each company and each year, obtained in (c) above was merged into a single excel workbook. This work book combines, matches and sorts the project descriptions (WBS's) and allocates RIN category Groups/Classes and splits the WBS expenditure across the appropriate year.</p> <p>It passes this information to the Material movement worksheet, which searches for material movements and maps them to RIN category Groups. This material information is utilised for the WBS split analysis where material items were found. The process reverts back to the original WBS allocations where no material items were identified.</p> <p>The work book then combines the two WBS allocations to present them as RIN category Groups/Classes and proportionally allocates a percentage of the Regulatory expenditure in that year (note only function codes 143, 144, 150, 154 & 157 are included)</p> <p>The combined results are passed into the Build-up worksheet, for final multiplication by expenditure totals, formatting and analysis.</p> <p>The process chart below describes the transfer of information, reading from right to left.</p>

Year	Methodology & Assumptions
2010	As 2009
2011	As 2009
2012	As 2009
2013	As 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>Estimation is required in this instance:</p> <ul style="list-style-type: none"> In order to bridge the differences in definitions between CitiPower / CitiPower Function Code accounts and the Regulatory Category Asset Classes. <ul style="list-style-type: none"> CitiPower / CitiPower function code definitions, for function codes 143,144,150,154 and 157, are broader than the Category Asset Classes and, in some cases, the Category Asset Groups. For expenditure to be allocated to an Asset Class the definition gap must be bridged.
2010	As 2009
2011	As 2009
2012	As 2009
2013	As 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Estimation is based on:</p> <ul style="list-style-type: none"> The manual allocation of a job category to each project cost collector (WBS). This allocation takes into account the description of the WBS, familiarisation with particular projects and technical knowledge of the CitiPower / CitiPower Distributions Networks (ie voltage levels and equipment utilisations ect). The additional allocation of a Category Asset Group and Class to each job category. This allocation takes into account the description of the WBS, familiarisation with particular projects and technical knowledge of the CitiPower / CitiPower Distributions Networks (ie voltage levels and equipment

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and																								
	<p>utilisations ect).</p> <ul style="list-style-type: none"> From this categorisation the % allocation of expenditure to each Category Asset Class can be determined and multiplied by the total regulatory spend in each year. This will provide a cost breakdown to the Category Asset Class level. This estimation technique does not result in a completely successful mapping. There is a residual that cannot be mapped due to inappropriate classifications (ie financial accruals at the function code level) or insufficient information in the WBS description to make a reasonable assumption. The residual is also influenced by plant and equipment for which age profiles are not available. Examples of this include but are not limited to: <ul style="list-style-type: none"> Financial Accrual / Transfers Plumbing and Backflow Prevention Fence Replacement Zone Subs Fire System replacement Lighting Systems Replacement Zone Subs Other ZSS Roof replacement Roof Replacement TF bays (concrete roofs) Roof Replacement Zone Sub Switchroom Sub Façade Replacement ZSS Building Redevelopment Air Conditioner Replacement Cable Duct Replacement Zone Sub Yards Fibre comms facilities Flexible Earths Replacement Flood Mitigation HV Earth Repair /Replacement (Reg 27) Surge Arrester Replacement <p>The residual is shown below as a percentage of the complete function code costs.</p> <table border="1"> <thead> <tr> <th></th> <th>2009</th> <th>2010</th> <th>2011</th> <th>2012</th> <th>2013</th> </tr> </thead> <tbody> <tr> <td>CitiPower</td> <td>29.68%</td> <td>28.34%</td> <td>0.56%</td> <td>8.32%</td> <td>6.78%</td> </tr> <tr> <td>CitiPower</td> <td>3.84%</td> <td>2.33%</td> <td>3.67%</td> <td>3.78%</td> <td>5.23%</td> </tr> </tbody> </table> <p>The two residual categories introduced to the template by this analysis are:</p> <table border="1"> <thead> <tr> <th>Asset Group</th> <th>Asset Category</th> </tr> </thead> <tbody> <tr> <td>OTHER BY: DSP DEFINED</td> <td>Plant & Stations Miscellaneous</td> </tr> <tr> <td>OTHER BY: DSP DEFINED</td> <td>Major Zone Substation Building Replacement Works</td> </tr> </tbody> </table> <p>The expenditure against these items by their nature is very variable in scope and driver, not of a homogenous nature across any stated asset sub-category, and so while there is expenditure for these activities, there are no consistent physicals or unit costs to report. By definition therefore, the expenditure against each activity is not related to any stated asset sub-category and hence an age profile dataset is not provided for these activities on table 5.2.1.</p> <ul style="list-style-type: none"> The Underground Cable By: Voltage < = 1kV category allocations include those associated with LV underground Service cable and Public Lighting U/G Cable as these values could not be distinguished in this process. 		2009	2010	2011	2012	2013	CitiPower	29.68%	28.34%	0.56%	8.32%	6.78%	CitiPower	3.84%	2.33%	3.67%	3.78%	5.23%	Asset Group	Asset Category	OTHER BY: DSP DEFINED	Plant & Stations Miscellaneous	OTHER BY: DSP DEFINED	Major Zone Substation Building Replacement Works
	2009	2010	2011	2012	2013																				
CitiPower	29.68%	28.34%	0.56%	8.32%	6.78%																				
CitiPower	3.84%	2.33%	3.67%	3.78%	5.23%																				
Asset Group	Asset Category																								
OTHER BY: DSP DEFINED	Plant & Stations Miscellaneous																								
OTHER BY: DSP DEFINED	Major Zone Substation Building Replacement Works																								
2010	As 2009																								
2011	As 2009																								
2012	As 2009																								
2013	As 2009																								

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.

2009	<p>This method was selected as:</p> <ul style="list-style-type: none"> • It provided a more accurate result than a percentage split of function codes based on unfounded estimation. • Further investigation of individual hard copy project documentation was not expected to significantly increase accuracy do to the unavailability of project files and variance in content. • There is no system based classification of projects other than by function code.
2010	As 2009
2011	As 2009
2012	As 2009
2013	As 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

- There are no replacements, failures or age profile reported against the plant and station residual categories as they are financial balances only. (Refer E.2 above for further information)

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Company (please circle/highlight): CitiPower

Tab name: 2.2 Repex	
Table name: 2.2.1 – Replacement expenditure, volumes and asset failures by asset category	
Asset Group	Asset Category
Underground Cables	(ALL data for Replacements)
Transformers	(ALL data for Replacements)
Switchgear	(ALL data for Replacements)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Asset failure (repex) The failure of an asset to perform its intended function safely and in compliance with jurisdictional regulations, not as a result of external impacts such as:

- extreme or atypical weather events; or
- third party interference, such as traffic accidents and vandalism; or
- wildlife interference, but only where the wildlife interference directly, clearly and unambiguously influenced asset performance; or
- vegetation interference, but only where the vegetation interference directly, clearly and unambiguously influenced asset performance.

Excludes planned interruptions.

Replacement Capital expenditure —‘Repex’ - The non-demand driven capex to replace an asset with its modern equivalent where the asset has reached the end of its economic life.. Capex has a primary driver of replacement expenditure if the factor determining the expenditure is the existing asset's inability to efficiently maintain its service performance requirement.

REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 22 indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the sub-categorisation provisions set out in (a) do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions. CitiPower must ensure that the sum of the individual asset categories, including any additional subcategory, additional other asset category

or asset refurbishment/ life extension asset category expenditure reconciles to the total expenditure of the asset group.

(d) CitiPower must ensure that the replacement volumes by asset group is equal to the applicable replacement volume data provided in table 2.2.2.

(e) CitiPower must ensure that the sum of the asset group replacement expenditures is equal to the total replacement expenditure contained in regulatory template 2.1.

(f) If CitiPower has provided estimated expenditure data on the basis of historical data that has included works across asset groups CitiPower must provide the asset age profile data in regulatory template 5.2 against the most elementary asset category. For example, where CitiPower replaces pole-mounted switchgear in conjunction with a pole-top structure it must report the asset age profile data against the relevant switchgear asset category. CitiPower must provide documentation of instances where backcast unit costs generated have involved allocations of historical records that include expenditure across asset groups.

Please provide a Response in this box:

This BoP conforms to the requirements and definitions of the CAT RIN as defined in the box above.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹¹ data green**; and **ESTIMATED¹²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

3. The list of project work breakdown structures(WBS) was obtained from SAP Business Intelligence (BI) reports for the function codes managed by the Plant and stations group:

- FC 143: High voltage switch replacement
- FC 144: Transformer and S/STN enclosure replacement
- FC 150: Underground line replacement
- FC 154: Unplanned asset replacement – primary plant and secondary assets
- FC 157: Zone substation primary plant replacement

Financial accounting CAPEX Report “**F264 CAP CP Netw Direct CAPEX**” was used for the CitiPower extraction and

Financial Accounting CAPEX report “**F262 CAP PAL Netw Direct CAPEX**” was used for the CitiPower extraction.

The data was extracted for each year individually. Data was extracted with WBS, Order and cost element

¹¹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

¹² “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

detail available.

4. The WBS data was then used to produce a list of Plant Maintenance Orders (PM orders) used and attached to the same WBS elements via the SAP transaction IW38 (change PM orders).
5. This list of PM Orders was then input into SAP transaction ZMAR (display material movements) to produce a list of material transactions associated with those PM Orders.
6. A full list of the SAP materials library was extracted from SAP via transaction IH09 (display material list).

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>The purpose of this methodology is to describe the process undertaken to allocate plant replacement physicals from CitiPower/CitiPower data structures into the data structures required by the AER.</p> <p>The SAP BI Financial Reporting Accounts provided function code account summaries for each of the function codes. This included project WBS's which could be used to identify the SAP PMOrders used by those projects. In turn the material movement transactions within those PMOrders could be obtained.</p> <p>The Material movement worksheet, searches for material movements and maps them to RIN category Groups. It achieves this by two methods, the first utilises a mapping of the SAP material library to the relevant RIN Category Groups/Classes. The second delves into material purchase orders that do not use a material number transaction to further identify and define material purchases. This second method particularly applies to major plant purchases which are contract based.</p> <p>For WBS's that obtain a material match the WBS (project) relative expenditure is split based on the proportionality of the material costs within that project and the year it occurred. This information is passed back to BI Function code / WBS calculator workbook.</p> <p>The BI Function code / WBS calculator worksheet workbook also identifies and ignores material transactions that have a negating return in a following year. This is required as these transactions can have major consequences on WBS proportionality particularly if the movement cost is large in comparison to the final (net) WBS expenditure.</p> <p>Lastly, the replacement numbers for the RIN Category Groups/Classes are also passed to the Build up workbook, for formatting, analysis and summation.</p> <p>The process chart below describes the transfer of information, reading from right to left.</p>

Year	Methodology & Assumptions
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>Estimation is required in this instance:</p> <ul style="list-style-type: none"> There is no direct system link between SAP project modules and SAP data modules for the plant and stations assets. For equipment added to the SAP Asset Management system there is no link to the project that initiated the asset creation and hence, no link to the function code. A material transaction from the logistics system is used as a proxy from replacements as the function code portfolio are all replacement spends.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Estimation is based on:</p> <ul style="list-style-type: none"> The use of materials purchased as a proxy for equipment installed. The WBS project definition provides a direct link via PMOrders to material transactions. Specific material purchases can be assumed to represent replacements. This estimation requires that a material transaction ideally utilises a material number. The estimation requires the mapping of material order descriptions to Category Groups and Classes via a manual process. This allocation takes into account the description of the material, familiarisation with particular naming conventions and technical knowledge of the CitiPower / CitiPower Distribution Networks (ie voltage levels and equipment utilisations ect).

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and						
	<ul style="list-style-type: none"> There are purchasing transactions that do not utilise material numbers, such as materials requisitions via purchase order. In these instances the material proxy algorithm cannot be used and manual intervention is required to allocate a proxy material number and quantities. This is typical of major plant purchases such as zone substation transforms or switchboard replacements. Where multiple allocations are found under a single WBS the full cost of the WBS material purchase is used as a proxy of Full WBS cost via a percentage allocation based on the proportionality of the materials mapped to RIN classes. There are no replacements reported against the plant and station residual categories as they are financial balances only. <p>The two residual categories referenced are:</p> <table border="1"> <thead> <tr> <th>Asset Group</th> <th>Asset Category</th> </tr> </thead> <tbody> <tr> <td>OTHER BY: DSP DEFINED</td> <td>Plant & Stations Miscellaneous</td> </tr> <tr> <td>OTHER BY: DSP DEFINED</td> <td>Major Zone Substation Building Replacement Works</td> </tr> </tbody> </table> <p>The expenditure against these items by their nature is very variable in scope and driver, not of a homogenous nature across any stated asset sub-category, and so while there is expenditure for these activities, there are no consistent physicals or unit costs to report. By definition therefore, the expenditure against each activity is not related to any stated asset sub-category and hence an age profile dataset is not provided for these activities on table 5.2.1.</p> <ul style="list-style-type: none"> The Underground Cable By: Voltage <= 1kV category allocations include those associated with LV underground Service cable and Public Lighting U/G Cable as these values could not be distinguished in this process. 	Asset Group	Asset Category	OTHER BY: DSP DEFINED	Plant & Stations Miscellaneous	OTHER BY: DSP DEFINED	Major Zone Substation Building Replacement Works
Asset Group	Asset Category						
OTHER BY: DSP DEFINED	Plant & Stations Miscellaneous						
OTHER BY: DSP DEFINED	Major Zone Substation Building Replacement Works						
2010	As per 2009						
2011	As per 2009						
2012	As per 2009						
2013	As per 2009						

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	<p>This method was selected as:</p> <ul style="list-style-type: none"> It provided a more accurate result than a percentage split of function codes based on qualities expectations. Further investigation of individual hard copy project documentation was not expected to significantly increase accuracy do to the unavailability of project files and variance in content. There is no system based classification of projects other than by function code.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. **No data provided**

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

- There are no replacements, failures or age profile reported against the plant and station residual categories as they are financial balances only. (Refer E.2 above for further information)

G. **Data Quality colour coding**

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.1 - Replacement Expenditure, Volumes & Asset Failures by Asset Category	
Asset Group	Asset
Asset Failures	Service Lines (No records)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

APPENDIX E: PRINCIPLES AND REQUIREMENTS

5. REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 22 indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.

APPENDIX F: DEFINITIONS

Asset failure (repex)

The failure of an asset to perform its intended function safely and in compliance with jurisdictional regulations, not as a result of external impacts such as:

- Extreme or atypical weather events; or
- Third party interference, such as traffic accidents and vandalism; or
- Wildlife interference, but only where the wildlife interference directly, clearly and unambiguously influenced asset performance; or
- Vegetation interference, but only where the vegetation interference directly, clearly and unambiguously influenced asset performance.
- Excludes planned interruptions.

Service lines

Includes assets that provide a physical link and associated assets between the distribution network and a customer’s premises

- It excludes any pole mounted assets and meters that are included in any other asset group.

Please provide a Response in this box:

No asset quantities are reported by CitiPower for the categories in Table 1, below, because the CitiPower network asset information systems do not provide, or has no records of, assets in these categories.

Table 1:

ASSET CATEGORY	VARIABLE NAME
SERVICE LINES BY: CONNECTION VOLTAGE;	<= 11 kV ; RESIDENTIAL ; SIMPLE TYPE

CUSTOMER TYPE; CONNECTION COMPLEXITY	<= 11 kV ; COMMERCIAL & INDUSTRIAL ; SIMPLE TYPE <= 11 kV ; RESIDENTIAL ; COMPLEX TYPE <= 11 kV ; COMMERCIAL & INDUSTRIAL ; COMPLEX TYPE <= 11 kV ; SUBDIVISION ; COMPLEX TYPE > 11 kV & <= 22 kV ; COMMERCIAL & INDUSTRIAL > 11 kV & <= 22 kV ; SUBDIVISION > 22 kV & <= 33 kV ; COMMERCIAL & INDUSTRIAL > 22 kV & <= 33 kV ; SUBDIVISION > 33 kV & <= 66 kV ; COMMERCIAL & INDUSTRIAL > 33 kV & <= 66 kV ; SUBDIVISION > 66 kV & <= 132 kV ; COMMERCIAL & INDUSTRIAL > 66 kV & <= 132 kV ; SUBDIVISION > 132 kV ; COMMERCIAL & INDUSTRIAL > 132 kV ; SUBDIVISION SERVICING REPLACEMENTS
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B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹³ data green**; and **ESTIMATED¹⁴/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

No asset quantities are reported by CitiPower for the categories listed in Table 1, above, because the CitiPower network asset information systems do not provide, or have no records of, assets in these categories.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	No asset quantities are reported by CitiPower for the categories listed in Table 1, above, because the CitiPower network asset information systems do not provide, or have no records of, assets in these categories.

¹³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No asset quantities are reported by CitiPower for the categories listed in Table 1, above, because the CitiPower network asset information systems do not provide, or have no records of, assets in these categories.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.1 – Replacement expenditure, volumes and asset failures by asset category	
Asset Group	Asset Category
Transformers	(ALL data for Failures)
Switchgear	(ALL data for Failures)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Asset failure (repex) The failure of an asset to perform its intended function safely and in compliance with jurisdictional regulations, not as a result of external impacts such as:

- extreme or atypical weather events; or
- third party interference, such as traffic accidents and vandalism; or
- wildlife interference, but only where the wildlife interference directly, clearly and unambiguously influenced asset performance; or
- vegetation interference, but only where the vegetation interference directly, clearly and unambiguously influenced asset performance.

Excludes planned interruptions.

Replacement Capital expenditure —‘Repex’ - The non-demand driven capex to replace an asset with its modern equivalent where the asset has reached the end of its economic life.. Capex has a primary driver of replacement expenditure if the factor determining the expenditure is the existing asset's inability to efficiently maintain its service performance requirement.

REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 22 indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the sub-categorisation provisions set out in (a) do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions. CitiPower must ensure that the sum of the individual asset categories, including any additional subcategory, additional other asset category or asset refurbishment/ life extension asset category expenditure reconciles to the total expenditure of the asset group.

- (d) CitiPower must ensure that the replacement volumes by asset group is equal to the applicable replacement volume data provided in table 2.2.2.
- (e) CitiPower must ensure that the sum of the asset group replacement expenditures is equal to the total replacement expenditure contained in regulatory template 2.1.
- (f) If CitiPower has provided estimated expenditure data on the basis of historical data that has included works across asset groups CitiPower must provide the asset age profile data in regulatory template 5.2 against the most elementary asset category. For example, where CitiPower replaces pole-mounted switchgear in conjunction with a pole-top structure it must report the asset age profile data against the relevant switchgear asset category. CitiPower must provide documentation of instances where backcast unit costs generated have involved allocations of historical records that include expenditure across asset groups.

Please provide a Response in this box:

This BoP conforms to the requirements and definitions of the CAT RIN as defined in the box above.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹⁵ data green**; and **ESTIMATED¹⁶/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

- Equipment data was extracted from CitiPower/CitiPower enterprise management system, SAP, using SAP transaction IH08 for the following SAP Technical Object Types:
 - D_REGULAT
 - D_TRANSF
 - SWER_TRANS
 - D_ACR
 - SWER_ACR
 - CB_LV
 - D_SWITCH
 - STN_RMU
 - UG_HV_CABL
 - CAP_STP_SW
 - CB_11KV
 - CB_22KV
 - CB_6.6KV
 - CB_66KV
 - STN_ETH_SW
 - STN_SWITCH

¹⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

- STN_COM_SW
 - STN_TRANS
2. SAP maintenance notification data was extracted from SAP using transaction IW69 for all notifications with notification types M1, BR, OA, as well as for all with the Breakdown flag checked. (these notification types are limited to plant and stations assets) These filters correspond to failures of assets and are linked to the SAP data in (1) by the SAP Equipment Number.
 3. Further equipment technical class data was extracted from GIS using queries for the following GIS Object Types:
 - ACR
 - Circuit Breaker
 - HV Cable
 - HV Switch
 - Regulator
 - Stn Switch
 - Stn Transformer
 - Substation
 - Transformer

This data was linked to the sap data in (1) by the SAP Equipment Number as the objects are connected between SAP and GIS.

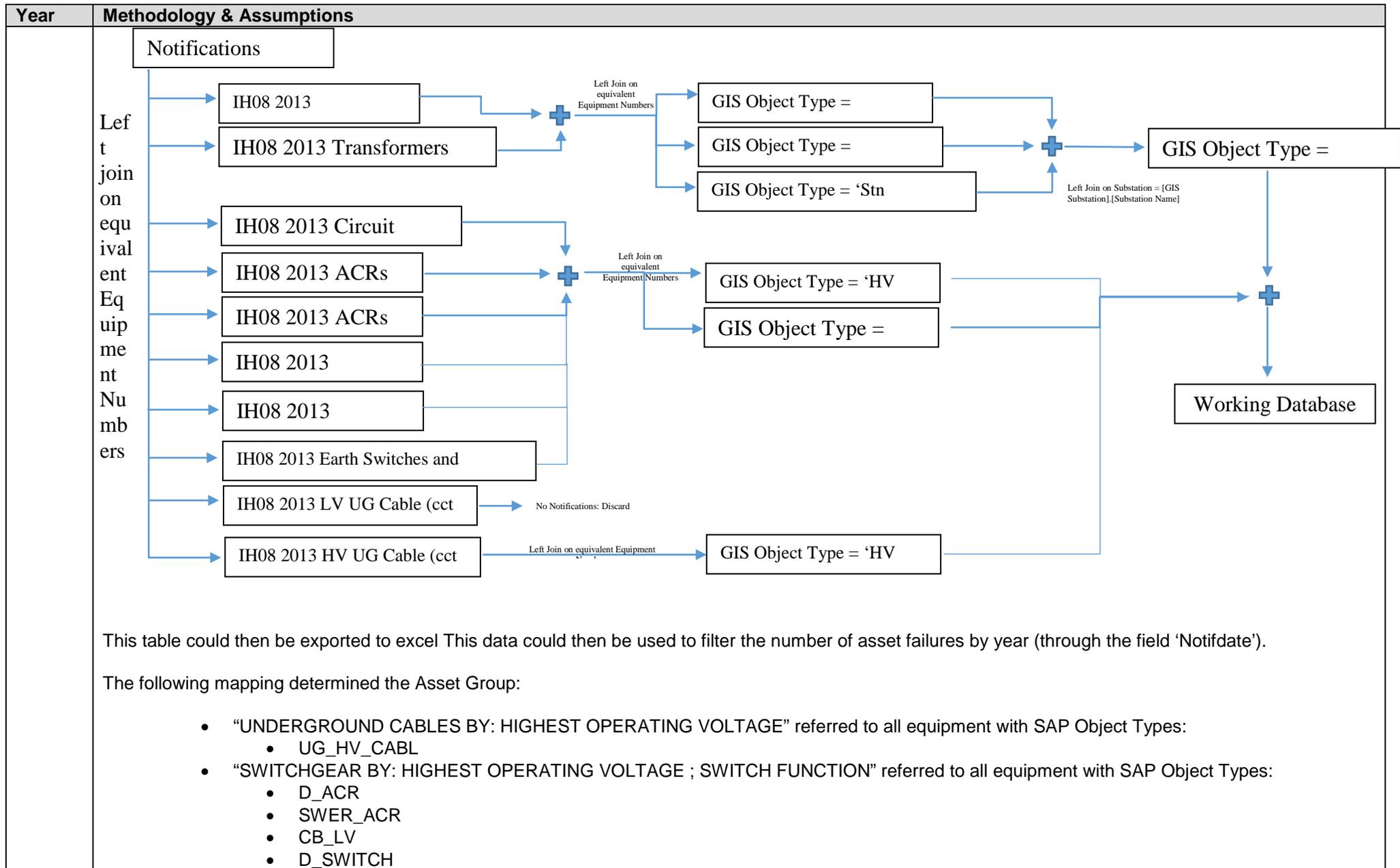
4. Substation data was extracted from SAP using Query IH06 for SAP technical object types
 - SUB_GND
 - SUB_INDR
 - SUB_ISO
 - SUB_KIOSK
 - SUB_POLE
 - SUB_SWER

This data was linked to the GIS Substation data in (3) through 'Name Plate' (SAP) and 'Description' (GIS).

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>The purpose of this methodology is to describe the process undertaken to allocate asset failures from CitiPower/CitiPower data structures into the data structures required by the AER.</p> <p>The SAP notification data was linked to both GIS and SAP equipment data sources in order map failures to the AER Asset Categories.</p> <p>To efficiently work with large amounts of data relating to multiple types of equipment across the network, Microsoft Excel was insufficient and so a Microsoft Access was created for this task.</p> <p>First all the SAP equipment data extracted in C 1 above was consolidated into one database with different columns for each of the specific asset SAP class properties. Then The GIS data that matched the equipment numbers was also added to t the data base.</p> <p>All SAP IH06 substation data was matched via Equipment Numbers the relevant GIS 'Substation' data via 'Name Plate' (SAP) and 'Description' (GIS). This data was consolidated.</p> <p>These data tables were then matched and linked to the notification data via SAP equipment numbers so that technical asset information could be obtained and mapped into the AER data groups and classes.</p> <p>The process can be summarised in the following flow chart:</p>



Year	Methodology & Assumptions
	<ul style="list-style-type: none"> • STN_RMU • UG_HV_CABL • CAP_STP_SW • CB_11KV • CB_22KV • CB_6.6KV • CB_66KV • STN_ETH_SW • STN_SWITCH • STN_COM_SW <ul style="list-style-type: none"> • TRANSFORMERS BY: MOUNTING TYPE; HIGHEST OPERATING VOLTAGE ; AMPERE RATING; NUMBER OF PHASES (AT LV) referred to all equipment with SAP Object Types: <ul style="list-style-type: none"> ○ D_REGULAT ○ D_TRANSF ○ SWER_TRANS ○ STN_TRANS <p>The Asset Category was determined by:</p> <ul style="list-style-type: none"> • Operating Voltage (from the GIS data) for “UNDERGROUND CABLES BY: HIGHEST OPERATING VOLTAGE” • ‘Circuit Breakers’ referred to all equipment with SAP Object Types ‘CB_LV,’ ‘CB_11KV,’ ‘CB_22KV,’ ‘CB_6.6KV,’ ‘CB_66KV’ • ‘Load Break Switch’ referred to all equipment with SAP Object Types ‘STN_RMU,’ ‘STN_SWITCH’ and ‘CAP_STP_SW,’ as well as D_SWITCH equipment indicated to be ‘Load breaking’ in the GIS data. • Other Switches were considered to be ‘ ISOLATORS, EARTHING SWITCH.’ • All Switches were also filtered and categorised by Operating Voltage • Transformers were classified by mounting position (from the GIS ‘Substation’ data), Operating Voltage and Number of Phases
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>Estimation is required in this instance:</p> <ul style="list-style-type: none"> • There is no formal asset failure data base available to provide this information. • CitiPower/CitiPower Outage Management System (OMS) outages are only recorded for assets which are mapped into the OMS database which is not all assets ie zone substations and sub transmission assets are not mapped • The business definition of failure via OMS is a supply interruption with customers off supply, not a functional failure of equipment. • When OMS is used to capture outage information the related OMS order is generally linked to a high level functional location and not at the failed equipment.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and						
2009	<p>Estimation is based on:</p> <ul style="list-style-type: none"> • Notifications with priorities P1 or with the breakdown box selected are considered failures. • Notifications can only be counted if they are directly linked to equipment, not functional locations. • There are no failures reported against the plant and station residual categories as they are financial balances only. <p>The two residual categories referenced are:</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Asset Group</th> <th>Asset Category</th> </tr> </thead> <tbody> <tr> <td>OTHER BY: DSP DEFINED</td> <td>Plant & Stations Miscellaneous</td> </tr> <tr> <td>OTHER BY: DSP DEFINED</td> <td>Major Zone Substation Building Replacement Works</td> </tr> </tbody> </table>	Asset Group	Asset Category	OTHER BY: DSP DEFINED	Plant & Stations Miscellaneous	OTHER BY: DSP DEFINED	Major Zone Substation Building Replacement Works
Asset Group	Asset Category						
OTHER BY: DSP DEFINED	Plant & Stations Miscellaneous						
OTHER BY: DSP DEFINED	Major Zone Substation Building Replacement Works						
2010	As per 2009						
2011	As per 2009						
2012	As per 2009						
2013	As per 2009						

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	<p>This method was selected as</p> <ul style="list-style-type: none"> • It was considered the most feasible option to produce a result for the complete data request. Although the likelihood of successful mapping was expected to be low and significantly underestimate the actual number of failures.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

<p>Response: Not Applicable</p>
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G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.1 – Replacement expenditure, volumes and asset failures by asset category	
Asset Group	Asset Category
Public Lighting	(ALL)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

5. REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

- (a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 22 indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.
- (b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.
- (c) In instances where CitiPower considers that both the prescribed asset group categories and the sub-categorisation provisions set out in (a) do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions. CitiPower must ensure that the sum of the individual asset categories, including any additional subcategory, additional other asset category or asset refurbishment/ life extension asset category expenditure reconciles to the total expenditure of the asset group.
- (d) CitiPower must ensure that the replacement volumes by asset group is equal to the applicable replacement volume data provided in table 2.2.2.
- (e) CitiPower must ensure that the sum of the asset group replacement expenditures is equal to the total replacement expenditure contained in regulatory template 2.1.
- (f) If CitiPower has provided estimated expenditure data on the basis of historical data that has included works across asset groups CitiPower must provide the asset age profile data in regulatory template 5.2 against the most elementary asset category. For example, where CitiPower replaces pole-mounted switchgear in conjunction with a pole-top structure it must report the asset age profile data against the relevant switchgear asset category. CitiPower must provide documentation of instances where backcast unit costs generated have involved allocations of historical records that include expenditure across asset groups.

Definitions

Major road: Roads on which the visual requirements of motorists are dominant (e.g. traffic routes). Typically the responsibility of a state or territory road authority.

Minor road: Roads on which the visual requirements of pedestrians are dominant (e.g. local roads and lighting that is applicable to areas other than roads outdoor public areas, e.g. outdoor shopping). Typically the responsibility of a local Government authority.

Replacement Capital expenditure —‘Repex’: The non-demand driven capex to replace an asset with its modern equivalent where the asset has reached the end of its economic life.. Capex has a primary driver of replacement expenditure if the factor determining the expenditure is the existing asset's inability to efficiently maintain its service performance requirement.

Asset failure (repex): The failure of an asset to perform its intended function safely and in compliance with jurisdictional regulations, not as a result of external impacts such as:

- extreme or atypical weather events; or
- third party interference, such as traffic accidents and vandalism; or
- wildlife interference, but only where the wildlife interference directly, clearly and unambiguously influenced asset performance; or
- vegetation interference, but only where the vegetation interference directly, clearly and unambiguously influenced asset performance.

Excludes planned interruptions.

Light replacement: The cost of replacement on a major or minor road of any of the following public lighting assets:

- Luminaires
- Brackets
- Lamps
- Poles dedicated to public lighting services; and
- Underground or overhead cabling dedicated to public lighting services.

Light replacement should be estimated as the replacement of public lighting assets with their modern equivalent, where the public lighting assets have reached the end of their economic life.

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 2.2.1 Cost Metrics by asset category for Public Lighting. We have provided data that complies with the instructions and definitions specified in the requirements as follows:

5.1

- (a) We have provided asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1.
- (b) not applicable
- (c) not applicable
- (d) not applicable
- (e) We have ensured that the sum of the public lighting asset group replacement expenditure is contained in regulatory template 2.1
- (f) not applicable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹⁷ data green**; and **ESTIMATED¹⁸/derived data red**

2009	2010	2011	2012	2013
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¹⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Expenditure (\$000's) : 2009 – 2013: The source data relating to financial costs were extracted from SAP Finance. Segregation of data into various asset groups was sourced from Public Light Fault Management System (PLFMS)
 ASSET REPLACEMENTS (000'S) : 2009 – 2013: The source data relating to asset replacements was based on an extract from SAP. This report lists all steel poles replaced as part of a maintenance (replacement) activity.
 ASSET FAILURES (000'S) : 2009-2013: Segregation of data into various asset groups was sourced from Public Light Fault Management System (PLFMS) a report known as PLFMS_Special_List listing all tasks completed for reported faults on the last day of the reportable year. Pole / Column data was unavailable. Limited data available from spreadsheet used to manage contractor invoices for 2012-2013 that counted poles / columns replaced >7m and =< 7m.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>EXPENDITURE (\$000's) : METHODOLOGY</p> <ul style="list-style-type: none"> • Per definition, for expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. • Actual volumes of asset replacements and failures (where available) are extracted from PLFMS and are used to allocate to Finance figures which are extracted from SAP. This allocation is done so through an average cost method to determine cost allocation for asset sub-categories. The following assumptions show a breakdown of the component costs of individual asset sub-categories. <p>ASSUMPTIONS</p> <p>Luminaires :</p> <ul style="list-style-type: none"> • Major Road >125W, Minor Road =<125W. (Cost Sharing detail not available on report available) • Assumption that only one luminaire is required for each Pole / Column : Major & Minor Replacements.(No detail available of bracket or bracket type available) • No allowance for luminaires replaced as part of other pole replacements (non-steel). (Only steel poles are recorded for Maintenance (Replacement) purposes) • No allowance for non-standard luminaires as part of asset failures. (Non-standard luminaire materials are provided by the public lighting customer) <p>Brackets :</p> <ul style="list-style-type: none"> • Major Road – Assumption that brackets required for all Poles / Columns: Major Road replacements & failures. (Bracket data is not retained by the business as an identifiable asset) • Minor Road – Assumption that brackets required for half of Poles / Columns : Minor Road replacements (Brackets are only required on some new poles, however no bracket data is retained by the business as an identifiable asset and unable to be verified) <p>Lamps</p> <ul style="list-style-type: none"> • Major Road – Assumption that lamp is inclusive to the luminaire. • Minor Road – Assumption that lamp is inclusive to the luminaire. <p>Poles / Columns</p> <ul style="list-style-type: none"> • Allocation of asset category was completed using Asset Failures – Pole / Column percentage allocation. (No detail was available for actual replacements to determine Major Road / Minor Road) • Steel poles are dedicated to Public Lighting with regard to replacements. (Other poles dedicated to public lighting were unable to be identified) • No allowance for non-standard poles as part of asset replacements. (Unable to quantify volume of replacements, material supplied by public lighting customer) <p>ASSET REPLACEMENTS (000'S) METHODOLOGY</p>

Year	Methodology & Assumptions
	<p>Luminaires :</p> <ul style="list-style-type: none"> Per definition,of replacement capital expenditure (Repex) only public lighting assets that were in service and billable have been included. The split for asset failures –Pole/column was used to determine the major/minor road split for asset replacements <p>Brackets :</p> <ul style="list-style-type: none"> No actual detail is available regarding brackets as the business does not separately identify this sub-category. Major Road - Estimation used where pole/column was replaced a bracket would also be required Minor Road – Estimation used where pole/column was replaced, half of these replacements would require a bracket to be installed. The split for asset failures –Pole/column was used to determine the major/minor road split for asset replacements <p>Lamps</p> <ul style="list-style-type: none"> Per definition, lamps are replacement capital expenditure (Repex), however they are inclusive to the total luminaire replacement and are not separately identified. <p>Poles / Columns</p> <ul style="list-style-type: none"> The split for asset failures –Pole/column was used to determine the major/minor road split for asset replacements No allowance for non-standard poles as part of asset replacements. (unable to quantify) <p>ASSUMPTIONS</p> <p>Luminaires :</p> <ul style="list-style-type: none"> Actual cost of luminaire replacement is not historically available and has been calculated by assuming that only one luminaire is required for each Pole / Column : Major & Minor Replacements. Allowance made for luminaires replaced as part of other pole replacements (non steel). <p>Brackets :</p> <ul style="list-style-type: none"> Major Road – Assumption that brackets required for Poles / Columns : Major Road replacements Minor Road – Assumption that brackets required for half of Poles / Columns : Minor Road replacements (there is a mixture of poles that would not require a bracket and those that would, Bracket data is not retained by the business) <p>Lamps</p> <ul style="list-style-type: none"> Major Road – Assumption that lamp is inclusive to the luminaire. Minor Road – Assumption that lamp is inclusive to the luminaire. <p>Poles / Columns</p> <ul style="list-style-type: none"> Unable to determine Major Road / Minor Road split. Split for Asset Failures – Pole / Column used to determine Major Road / Minor Road. Assumption that only steel poles are dedicated to Public Lighting with regard to replacements. (Other poles dedicated to public lighting were unable to be identified.) <p>ASSET FAILURES (000'S)</p> <p>METHODOLOGY</p> <p>Luminaires :</p> <ul style="list-style-type: none"> Per definition,of replacement capital expenditure (Repex) only public lighting assets that were in service and billable have been included. Volumes were extracted from PLFMS to determine the total number of luminaires replaced. Luminaires were allocated to Major Road / Minor Road based on actual split available for Asset Failures <p>Brackets :</p> <ul style="list-style-type: none"> Per definition of replacement capital expenditure (Repex) only public lighting assets that were in service and billable have been included. Unable to determine Major Road / Minor Road split. Split for Asset Failures – Pole / Column used to determine Major Road / Minor Road. <p>Lamps :</p> <ul style="list-style-type: none"> Per definition, lamps are replacement capital expenditure (Repex), however they are inclusive to the total luminaire replacement and are not separately identified. <p>Poles / Columns</p> <ul style="list-style-type: none"> Per definition of replacement capital expenditure, major road / minor road split for asset failures was determined by the pole/column used. (major road > 7m, minor road =< 7m.

Year	Methodology & Assumptions
	<ul style="list-style-type: none"> No allowance for non-standard poles as part of asset replacements. (unable to quantify) Based on source data provided for managing contractor invoices 2012-2013. (Business has not previously retained this level detail and was only required for contractor invoicing verification .) <p>ASSUMPTIONS</p> <p>Luminaires :</p> <ul style="list-style-type: none"> Major Road >125W, Minor Road =<125W. No allowance for non-standard luminaires as part of asset failures. <p>Brackets :</p> <ul style="list-style-type: none"> Major Road – Assumption that brackets required for Poles / Columns : Major Road Failures Minor Road – Assumption that brackets not required (Bracket data is not retained by the business) <p>Lamps</p> <ul style="list-style-type: none"> Major Road – Assumption that lamp is inclusive to the luminaire. Minor Road – Assumption that lamp is inclusive to the luminaire. <p>Poles / Columns</p> <ul style="list-style-type: none"> Major Road >7m, Minor Road =<7m Allowance for non-standard poles as part of asset failures. Pole / Column data was unavailable via PLFMS reporting. Limited data available from spreadsheet used to manage contractor invoices for 2012-2013 that counted poles / columns replaced >7m and =< 7m. Allowance for non-standard poles as part of asset failures
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>EXPENDITURE (\$000'S) :</p> <ul style="list-style-type: none"> Per definition, total expenditure for asset category was available however actual costs for sub-categories were not available. Business does not retain detail of asset replacements, cost allocation is completed historically by a percentage allocation to asset category with little or no detail of sub-categories. Business does retain some detail of asset failures pertaining to volumes however this is not on a per unit basis. Cost allocation is completed historically to asset category with limited detail of sub-categories. Using an estimate ensured that costs were allocated appropriately between asset replacements and asset failures. <p>ASSET REPLACEMENTS</p> <ul style="list-style-type: none"> Business does not retain detail of asset replacements on a per unit basis. Replacements are generally bundled with other maintenance activities. As mentioned above cost allocation was completed historically to asset category, not asset sub-categories. Collating the information would require a significant time commitment and we would be unable to achieve reporting deadlines. Due to the lack of detail, allocation to sub-categories could only be done by estimation. <p>ASSET FAILURES</p> <ul style="list-style-type: none"> Business retains some information of asset failures by asset categories and this was used where available. Estimations were required for pole/column failures as this detail was not available. Allocation to major road / minor road was not retained historically. Allocation was completed using cost sharing,(full cost & cost shared) as the best fit to the RIN definition.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
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Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>EXPENDITURE (\$000'S) :</p> <p>Approach used:</p> <ul style="list-style-type: none"> • Based on total expenditure for asset category, estimation was used to establish allocation to sub-categories as actual costs were not available. • Business does not retain detail of asset replacements, cost allocation is completed historically to asset category with little or no detail of sub-categories. • Business does retain some detail of asset failures pertaining to volumes however this in not on a per unit basis. Cost allocation is completed historically to asset category with limited detail of sub-categories. • Using an estimate ensured that costs were allocated appropriately between asset replacements and asset failures. <p>Options considered:</p> <ul style="list-style-type: none"> • Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. • Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. • Volumes were not available for asset replacements • Limited volumes were available for asset failures and this was used were possible. <p>Assumptions made:</p> <ul style="list-style-type: none"> • The definition as per the RIN required that all roads managed by state road authorities be classified as 'major roads', roads managed by municipal councils classified as 'minor roads'. • Total expenditure has been allocated across sub-categories as no other further allocation was possible. <p>ASSET REPLACEMENTS</p> <p>Approach used:</p> <ul style="list-style-type: none"> • Business does not retain detail of asset replacements, volumes could only be estimated by assuming that with each pole/column change a new bracket and luminaire would also be required. In the case of minor roads, it was estimated that brackets would only be required on half of poles replaced (other half would be inclusive with the pole). • Business does retain some detail of asset failures pertaining to volumes however this in not on a per unit basis. Cost allocation is completed historically to asset category with limited detail of sub-categories. • Using estimate ensured that volumes were allocated appropriately between asset replacements and asset failures. <p>Options considered:</p> <ul style="list-style-type: none"> • Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. • Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. • Volumes were not available for asset replacements <p>Assumptions made:</p> <ul style="list-style-type: none"> • The definition as per the RIN required that all roads managed by state road authorities be classified as 'major roads', roads managed by municipal councils classified as 'minor roads' • Where cost sharing of luminaires was unavailable on reports, pole length (ie. major road >7m) or wattage (ie. major road >125W) were used to determine allocation to sub-category. • Business does not retain detail of asset replacements on a per unit basis. Replacements are generally bundled with other maintenance activities. As mentioned above cost allocation was completed historically to asset category, not asset sub-categories. Collating the information would require a significant time commitment and we would be unable to achieve reporting deadlines. • Due to the lack of detail, allocation to sub-categories could only be done by estimation. <p>ASSET FAILURES</p> <p>Approach used:</p> <ul style="list-style-type: none"> • Business does not retain detail of asset replacements, cost allocation is completed historically to asset category with little or no detail of sub-categories. • Business does retain some detail of asset failures pertaining to volumes however this in not on a per unit basis. Cost allocation is completed historically to asset category with limited detail of sub-categories. • Using estimate ensured that volumes were allocated appropriately between asset replacements and

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
	asset failures. Options considered: <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. Some volumes were available for asset failures, however pole/column failures could not be identified. Assumptions made: <ul style="list-style-type: none"> The definition as per the RIN required that all roads managed by state road authorities be classified as 'major roads', roads managed by municipal councils classified as 'minor roads.' Business retains some information of asset failures by asset categories and this was used where available. Estimations were required for pole/column failures as this detail was not available. Allocation to major road / minor road was not retained historically. Allocation was completed using cost sharing,(full cost & cost shared) as the best fit to the RIN definition.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other reliable data is available for the period required.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.1 - REPLACEMENT EXPENDITURE, VOLUMES AND ASSET FAILURES BY ASSET CATEGORY	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	ZONE SUBSTATION RELAYS

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in *regulatory template 5.2* as per its respective instructions.

Field devices (Repex) This includes old fashioned electromechanical relays and modern digital relays that incorporate many functions. This includes field devices such as relays, Remote Terminal Unit, Program Logic Controllers, Data storage, communication interfaces, and local master stations.

Response: There is a need to clearly distinguish equipment types within the Field device category.

'Scada, Network Control and Protection Systems' exists within the prescribed asset categories in 2.2.1. Field Devices relates to a sub-category and so as per the RIN an additional row has been inserted to indicate this. Furthermore this sub asset category also has been specified to capture all relays at 'Zone Substation Relays.' Expenditure and Asset replacement / failure volumes have been reconciled to the higher level asset category and corresponding age profile data exists in Template 5.2

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹⁹ data green**; and **ESTIMATED²⁰/derived data red**

2009	2010	2011	2012	2013
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¹⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response: Data is Sourced from the Relay Setting Information System (RESIS) by running a query that provides data on all applied settings for the 12 month period.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	The data is based on a report of 'applied settings' in RESIS. This applied settings report is manually filtered for all occurrences of changes in relays. This is required as many applied settings may be an update of an existing relay and therefore not relating to Repex data. Known relay augmentations (new protection schemes) are also removed to establish replacement quantities.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	A data migration occurred moving CitiPower Relay settings in to the CitiPower RESIS system in 2009. It is assumed that all data was transferred and available at the time but this can not be verified. The available data was used to establish the replacement units.
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Available RESIS data and process is used as per later years
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	This was the only available data.
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.1 - Replacement Expenditure, Volumes & Asset Failures by Asset Category	
Variable	CitiPower Definition
Automation Replacement Expenditure	<p>The business Function Code 166 captures the expenditure of projects for Automation Replacement Expenditure. These projects usually involve of any or all of the following new distribution network components:</p> <ul style="list-style-type: none"> • Automatic Circuit Reclosers (ACR's) • Remote Control HV Switches • Remote Control HV Sectionalisers • Remote Control Ring Main Units (RMU's).

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Automation Replacement Expenditure:

5. REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word "REFURBISHED". CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the sub-categorisation provisions set out in (a) do not account for an asset on CitiPower's distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions. CitiPower must ensure that the sum of the individual asset categories, including any additional subcategory, additional other asset category or asset refurbishment/ life extension asset category expenditure reconciles to the total expenditure of the asset group.

(d) CitiPower must ensure that the replacement volumes by asset group is equal to the applicable replacement volume data provided in table 2.2.2.

(e) CitiPower must ensure that the sum of the asset group replacement expenditures is equal to the total replacement expenditure contained in regulatory template 2.1.

(f) If CitiPower has provided estimated expenditure data on the basis of historical data that has included works across asset groups CitiPower must provide the asset age profile data in regulatory template 5.2 against the most elementary asset category. For example, where CitiPower replaces pole-mounted switchgear in conjunction with a

pole-top structure it must report the asset age profile data against the relevant switchgear asset category. CitiPower must provide documentation of instances where backcast unit costs generated have involved allocations of historical records that include expenditure across asset groups

5.2 Table 2.2.2 instructions:

(a) CitiPower must provide total volume of assets currently in commission and replacement volumes of certain asset groups by specified aggregated metrics. In instances where this information is estimated CitiPower must explain how it has determined the volumes, detailing the process and assumptions used to allocate asset volumes to the aggregated metrics.

Please provide a Response in this box:

Automation Replacement Expenditure:

5.1 Table 2.2.1

- a. Automation Replacement Expenditure is provided in table 2.2.1. This provision represents an asset subcategory as part of the asset category 'Scada, Network Control and Protection Systems
- b. Expenditure associated with asset refurbishments/ life extensions are not applicable for Automation Replacement Expenditure
- c. Additional asset subcategories have been included as required.
- d. Total replacement asset volumes have been provided in table 2.2.2 however Automation Replacement Expenditure assets do not correlate with the applicable data in this table
- e. The sum of Automation Replacement Expenditure has been reconciled to regulatory template 2.1 wherein it represents a subset of the total asset replacement expenditure.
- f. The data provided is based on actual expenditure recorded in SAP and does not consider estimated data.
- g. CitiPower has provided total assets currently in commission in Table 2.2.2 as in line with RIN requirements

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²¹ data green**; and **ESTIMATED²²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data for the current and past years for Function Code 166 Automation Replacement Expenditure and cost allocations for years 2009-2013 inclusive have been sourced from the SAP accounting system. SAP is the primary

²¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

financial reporting system and is the source of providing the audited statutory account for CitiPower.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Table 2.2.1</p> <p>Methodology & Assumptions – Automation Replacement Expenditure Data The SAP financial system is used to extract the information required to state the CitiPower Automation Replacement Expenditure information by category and regulatory segment. Using the audited statutory accounts for CitiPower the business uses cost elements within SAP in order to disaggregate the data for the purposes of apportioning Automation Replacement Expenditure between OPEX/CAPEX categories and regulatory segments in accordance with the cost allocation methodology.</p> <p>Methodology & Assumptions – Automation Replacement Volume Data Volume data has been populated by obtaining the material data for each PM Order, grouping the numbers for each asset sub category and aligning to the relevant Category Analysis definition, and summing each category's volume data. This was undertaken for each year as required.</p>
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why was an estimate required, including why it is not possible to use actual data;
009	No estimation or derivation was required; Automation Replacement Expenditure and Volume was sourced from SAP
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	No estimation or derivation was required; Automation Replacement Expenditure and Volume was sourced from SAP
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No estimation or derivation was required; Automation Replacement Expenditure and Volume was sourced from SAP
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.1 – Replacement expenditure, volumes and asset failures by asset category	
Asset Group	Asset Category
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS BY: FUNCTION	(ALL data for Failures)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Asset failure (repex) The failure of an asset to perform its intended function safely and in compliance with jurisdictional regulations, not as a result of external impacts such as:

- extreme or atypical weather events; or
- third party interference, such as traffic accidents and vandalism; or
- wildlife interference, but only where the wildlife interference directly, clearly and unambiguously influenced asset performance; or
- vegetation interference, but only where the vegetation interference directly, clearly and unambiguously influenced asset performance.

Excludes planned interruptions.

Replacement Capital expenditure —‘Repex’

The non-demand driven capex to replace an asset with its modern equivalent where the asset has reached the end of its economic life. Capex has a primary driver of replacement expenditure if the factor determining the expenditure is the existing asset’s inability to efficiently maintain its service performance requirement.

REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

- (a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 22 indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.
- (b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.
- (c) In instances where CitiPower considers that both the prescribed asset group categories and the sub-categorisation provisions set out in (a) do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions. CitiPower must ensure that the sum of the individual asset categories, including any additional subcategory, additional other asset category

or asset refurbishment/ life extension asset category expenditure reconciles to the total expenditure of the asset group.

(d) CitiPower must ensure that the replacement volumes by asset group is equal to the applicable replacement volume data provided in table 2.2.2.

(e) CitiPower must ensure that the sum of the asset group replacement expenditures is equal to the total replacement expenditure contained in regulatory template 2.1.

(f) If CitiPower has provided estimated expenditure data on the basis of historical data that has included works across asset groups CitiPower must provide the asset age profile data in regulatory template 5.2 against the most elementary asset category. For example, where CitiPower replaces pole-mounted switchgear in conjunction with a pole-top structure it must report the asset age profile data against the relevant switchgear asset category. CitiPower must provide documentation of instances where back cast unit costs generated have involved allocations of historical records that include expenditure across asset groups.

Please provide a Response in this box:

REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

(a) Sub categories have not been used. However additional categories have been added. (refer (c))

(b) There has been minor refurbishment expenditure however it is not identifiable in the data and has been included with the replacement costs. As such no "REFURBISHED" additional lines have been added.

(c) Additional categories have been included. Expenditure and replacement data have been provided for this information. Asset Group expenditure is accurate.

(d) Not applicable

(e) Not applicable

(f) CitiPower has provided estimated data which coincides with the provision of the related aged profile data in regulatory template 5.2.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²³ data green**; and **ESTIMATED²⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Equipment data was extracted from CitiPower enterprise management system, SAP. SAP maintenance notification data was also extracted.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

²³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	The purpose of this methodology is to describe the process undertaken to allocate asset failures from CitiPower data structures into the data structures required by the AER. Scada Asset failure notification data is extracted from SAP and manually linked to SAP equipment information as it is originally linked via location instead of equipment. This enables CitiPower to map relevant notification data to fulfil AER RIN category requirements. Notification data which is labelled as a high priority is considered a failure.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Estimation is required in this instance: <ul style="list-style-type: none"> There is no formal asset failure data base available to directly extract asset failure information that is in line with the RIN. CitiPower Outage Management System (OMS) outages are only recorded for assets which are mapped into the OMS database which is not all assets i.e. zone substations and sub transmission assets are not mapped The business definition of failure via OMS is a supply interruption with customers off supply, not a functional failure of equipment. When OMS is used to capture outage information the related OMS order is generally linked to a high level functional location and not at the failed equipment.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Notification data extracted from SAP is manually linked to equipment data also extracted from SAP.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	This method was selected as it was considered the most feasible option to produce a result for the complete data request. Although the likelihood of successful mapping was expected to be low and significantly underestimate the actual number of failures.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.1 - REPLACEMENT EXPENDITURE, VOLUMES AND ASSET FAILURES BY ASSET CATEGORY	
Table name: 5.2.1 - ASSET AGE PROFILE	
ASSET GROUP	ASSET CATEGORY
OTHER	Recoverable Works Faults Expenditure
OTHER	TV Interference Related Expenditure
OTHER	Environmental Related Replacement Expenditure
OTHER	Bushfire Mitigation Related Expenditure
OTHER	Lines Miscellaneous

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Table 2.2.1 instructions:

- (a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in *regulatory template 5.2* as per its respective instructions.
- (b) In instances where CitiPower is reporting expenditure associated with *asset refurbishments/ life extensions capex* it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding age profile data in *regulatory template 5.2* as per its respective instructions.
- (c) In instances where CitiPower considers that both the prescribed asset group categories and the sub-categorisation provisions set out in (a) do not account for an asset on CitiPower’s *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 5.2* as per its respective instructions. CitiPower must ensure that the sum of the individual asset categories, including any additional subcategory, additional other asset category or asset refurbishment/ life extension asset category expenditure reconciles to the total expenditure of the asset group.
- (d) CitiPower must ensure that the replacement volumes by asset group is equal to the applicable replacement volume data provided in table 2.2.2.
- (e) CitiPower must ensure that the sum of the asset group replacement expenditures is equal to the total replacement expenditure contained in regulatory template 2.1.
- (f) If CitiPower has provided estimated expenditure data on the basis of historical data that has included works across asset groups CitiPower must provide the asset age profile data in *regulatory template 5.2* against the most elementary asset category. For example, where CitiPower replaces pole-mounted switchgear in conjunction with a pole-top structure it must report the asset age profile data against the relevant switchgear asset category. CitiPower must provide documentation of instances where backcast unit costs generated have involved allocations of historical records that include expenditure across asset groups.

Please provide a Response in this box:

Responses against each clause:

- (a) Not applicable, as this expenditure is not being recorded against the asset sub-categories.
- (b) Not applicable, as this expenditure does not relate to *asset refurbishments*.
- (c) Not applicable, as CitiPower is not adding additional an additional asset group.
- (d) Not applicable, as this information does not include replacement volume data
- (e) The sum of the expenditure across the entire Table 2.2.2 is equal to the replacement expenditure contained in regulatory template 2.1, as the source of the financial data was the same report from SAP.
- (f) Not applicable, as Actual expenditure data has been used.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁵ data green**; and **ESTIMATED²⁶/derived data red**
Expenditure

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Financial data obtained from a report from SAP.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>The costs were obtained directly from the Electricity Networks Business Unit Function Code Expenditure for that year. The expenditure against these items by their nature is very variable in scope and driver, not of a homogenous nature across any stated asset sub-category, and so while there is expenditure for these activities, there are no consistent physicals or unit costs to report. By definition therefore, the expenditure against each Function Code is not related to any stated asset sub-category age profile dataset.</p> <p>The expenditure is being reported in the Repex Table as these Function Codes were previously reported in the Environment, Safety & Legal, or in the Reliability & Quality Maintained categories in the Annual RIN Submissions.</p> <p>Each item has the following Function Code (F/C):</p> <ul style="list-style-type: none"> • Recoverable Works Faults Expenditure (F/C 146) <p>This F/C covers works to replace a variety of assets as a result of third party damage, and not driven by any specific asset sub-category, and therefore no related asset age profile data.</p> <ul style="list-style-type: none"> • TV Interference Related Expenditure (F/C 159)

²⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>This F/C covers miscellaneous works on a range of assets to ensure all connections do not cause TV/Radio interference, and there is no related asset age profile data.</p> <ul style="list-style-type: none"> • Environmental Related Replacement Expenditure (F/C 163) <p>This F/C covers works related to the establishment of environmental protection measures across the network and associated sites, and there is no related asset age profile data.</p> <ul style="list-style-type: none"> • Bushfire Mitigation Related Expenditure (F/C 164) <p>This F/C covers miscellaneous 're-arrangement' works to avoid the need for on-going vegetation clearance, and there is no related asset age profile data.</p> <ul style="list-style-type: none"> • Lines Miscellaneous - F/C 172. This F/C covers miscellaneous items to help prevent or track fault locations. - Residual of F/C 158, This F/C covers works of planned overhead conductor replacement, but the residual relates to miscellaneous line works not related to the overhead conductor projects. • Pole Life Extension Treatment (F/C 147) <p>This F/C covers the procurement and implementation of 'pole saver' rods, to retard wood deterioration.</p>
2010	As for 2009
2011	The methodology from 2011 onward is identical except that costs associated with Recoverable Works Faults Expenditure has moved to being reported against Quoted Opex from 2011 onwards. From 2011 these costs are reported in the CatA RIN Table 4.4.1, Quoted Services.
2012	As for 2011
2013	As for 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

There are no physicals related to an asset age profile for these expenditure categories, so a zero has been entered.

The expenditure against these items by their nature is very variable in scope and driver, not of a homogenous nature across any stated asset sub-category, and so while there is expenditure for these activities, there are no consistent physicals or unit costs to report

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G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

For the Cost data:

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.2 - Selected Asset Characteristics	
Asset Group	Asset
Asset Volumes Currently in Commission – Current Year	Poles by Reliability Feeder Type Overhead Conductor by Reliability Feeder Type Overhead Conductor by Material Type

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

APPENDIX E: PRINCIPLES AND REQUIREMENTS

3. BASIS OF PREPARATION

3.1 CitiPower must explain, for all information in the regulatory templates, the basis upon which CitiPower prepared information to populate the input cells (basis of preparation).

3.2 The basis of preparation must be a separate document (or documents) that CitiPower submits with its completed regulatory templates.

3.3 The basis of preparation must follow a logical structure that enables auditors, assurance practitioners and the AER to clearly understand how CitiPower has complied with the requirements of this Notice.

3.4 At a minimum, the basis of preparation must:

- (a) demonstrate how the information provided is consistent with the requirements of the Notice;
- (b) explain the source from which CitiPower obtained the information provided;
- (c) explain the methodology CitiPower used to provide the required information, including any assumptions CitiPower made; and
- (d) explain circumstances where CitiPower cannot provide input for a variable using actual information, and therefore must provide estimated information:
 - (i) why an estimate was required, including why it was not possible for CitiPower to use actual information;
 - (ii) the basis for the estimate, including the approach used, assumptions made and reasons why the estimate is CitiPower’s best estimate, given the information sought in the Notice.

5.2 Table 2.2.2 instructions:

(a) CitiPower must provide total volume of assets currently in commission and replacement volumes of certain asset groups by specified aggregated metrics. In instances where this information is estimated CitiPower must explain how it has determined the volumes, detailing the process and assumptions used to allocate asset volumes to the aggregated metrics.

APPENDIX F: DEFINITIONS

Installed assets – quantity currently in commission by year

The number of assets currently in commission and the year they were installed.

Poles

These are vertically oriented assets that provide load bearing structural support for overhead conductors or other lines assets.

- This also includes associated pole top structures, such as cross-arms and insulators where these are replaced in conjunction with a pole replacement project.
- It excludes other pole mounted assets that are included in any other asset group, notably pole mounted substations and pole mounted switchgear such as links, fuses, air break switches etc.

Overhead conductors

These assets have the primary function of distributing power, above ground, within the distribution network. It excludes any pole mounted assets that are included in any other asset group

Please provide a Response in this box:

As consistent with 5.2 Table 2.2.2, CitiPower has provided total volume of assets currently in commission. Although the below methodology does not use the suggested Route Length methodology it does deliver the network circuit length using the criteria specified in this Information Notice.

These methodologies meet the requirements of this Information Notice to the best of our abilities.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁷ data green**; and **ESTIMATED²⁸/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

For CitiPower, GIS is the originating data source (i.e. from where the data is obtained).

For 2013, the source data is the same data that was used to complete the AER Annual RIN Reports (non-Financial), tab "5. General Information".

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Poles by Feeder Type For the year 2013 the data was obtained utilising a GIS (Geographical Information System) query that traces the in-service network connectivity model in GIS, to determine the poles located within the CitiPower service territory.

²⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>The information obtained from GIS enables categorisation of poles by Feeder Type.</p> <ul style="list-style-type: none"> • Sub-transmission poles were excluded • Stay Poles were excluded • Public Lighting Poles were excluded • Any other pole that could not be classified as either CBD, Urban, Rural Short, or Rural Long was excluded <p>Overhead conductors by Feeder Type</p> <p>For the year 2013 the data was obtained utilising a GIS query that traces the in-service network connectivity model in GIS, to determine the circuit line length, which includes all spurs.</p> <p>Each circuit element was evaluated in its own right, for example:</p> <ul style="list-style-type: none"> • SWER lines, single-phase lines, and three-phase lines counted as one line • Double circuit lines counted as two lines <p>Notes:-</p> <ul style="list-style-type: none"> • Although this methodology does not use the suggested Route Length methodology it does deliver the network circuit length using the criteria specified in this Information Notice. • Overhead elements associated with communication, protection & control and unmetered loads were excluded • Overhead elements in the DNSP's area that are owned by another DNSP were excluded <p>The information obtained from GIS enables categorisation of overhead conductors by Feeder Type.</p> <ul style="list-style-type: none"> • Sub-transmission conductors were excluded • LV Overhead Service conductors were excluded • Overhead Public Lighting conductors were excluded • Any other conductor that could not be classified as either CBD, Urban, Rural Short, or Rural Long was excluded <p>Overhead conductors by Material</p> <p>For the year 2013 the data was obtained utilising the same GIS query used for Overhead conductors by Feeder Type.</p> <p>The information obtained from GIS enables categorisation of overhead conductors by Material.</p> <ul style="list-style-type: none"> • LV Overhead Service conductors of all materials/types were excluded
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E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	No estimation or derivation was used

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	No estimation or derivation was used

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable

2011	Not Applicable
2012	Not Applicable
2013	No estimation or derivation was used

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Data has been provided for all the years requested.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.2 – Selected Asset Characteristics	
Asset Group	Asset Category
Underground Cables	(ALL data)
Transformers	(ALL data)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Asset failure (repex) The failure of an asset to perform its intended function safely and in compliance with jurisdictional regulations, not as a result of external impacts such as:

- extreme or atypical weather events; or
- third party interference, such as traffic accidents and vandalism; or
- wildlife interference, but only where the wildlife interference directly, clearly and unambiguously influenced asset performance; or
- vegetation interference, but only where the vegetation interference directly, clearly and unambiguously influenced asset performance.

Excludes planned interruptions.

Replacement Capital expenditure —‘Repex’ - The non-demand driven capex to replace an asset with its modern equivalent where the asset has reached the end of its economic life.. Capex has a primary driver of replacement expenditure if the factor determining the expenditure is the existing asset's inability to efficiently maintain its service performance requirement.

REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

- (a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 22 indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.
- (b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.
- (c) In instances where CitiPower considers that both the prescribed asset group categories and the sub-categorisation provisions set out in (a) do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions. CitiPower must ensure that the sum of the individual asset categories, including any additional subcategory, additional other asset category or asset refurbishment/ life extension asset category expenditure reconciles to the total expenditure of the asset group.

- (d) CitiPower must ensure that the replacement volumes by asset group is equal to the applicable replacement volume data provided in table 2.2.2.
- (e) CitiPower must ensure that the sum of the asset group replacement expenditures is equal to the total replacement expenditure contained in regulatory template 2.1.
- (f) If CitiPower has provided estimated expenditure data on the basis of historical data that has included works across asset groups CitiPower must provide the asset age profile data in regulatory template 5.2 against the most elementary asset category. For example, where CitiPower replaces pole-mounted switchgear in conjunction with a pole-top structure it must report the asset age profile data against the relevant switchgear asset category. CitiPower must provide documentation of instances where backcast unit costs generated have involved allocations of historical records that include expenditure across asset groups.

Please provide a Response in this box:

This BoP conforms to the requirements and definitions of the CAT RIN as defined in the box above.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁹ data green**; and **ESTIMATED³⁰/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

1. Transformer replacement quantities were obtained from the replacement quantities provided to the AER in table 2.2.1
2. Underground cable replacement quantities were obtained from the replacement quantities provided to the AER in table 2.2.1
3. Asset volumes currently in commission were obtained from the 2013 CitiPower/CitiPower asset metric reports previously provided to the AER.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>A. The purpose of this methodology is to describe the process undertaken to allocate transformer MVA replacement quantities as requested by the AER.</p> <p>The replacement counts against each AER transformer class were multiplied by the largest transformer size purchased by CitiPower/CitiPower in the class bounds. These resultant values</p>

²⁹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>were then summated for each year.</p> <p>B. The purpose of this methodology is to describe the process undertaken to allocate transformer MVA retirement quantities as requested by the AER.</p> <p>The replacement counts determined in A. above were estimated to be 90% of the replacement quantity based on a qualitative data estimation derived after discussion with logistics and technical standards.</p> <p>C. The purpose of this methodology is to describe the process undertaken to allocate underground cable feeder type quantities as requested by the AER.</p> <p>The replacement counts against each AER underground cable class were multiplied by the network metric ratios obtained from the asset metric reports.</p>
2010	As 2009
2011	As 2009
2012	As 2009
2013	As 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>Estimation is required in this instance:</p> <p>A. The original replacement quantities are estimates based on material purchases and as such the values provided here are estimates.</p> <p>B. The original replacement quantities are estimates and as such the values provided here are estimates. In addition disposals and refurbishment quantities are not measured.</p> <p>C. The original replacement quantities are estimates based on material purchases and as such the values provided here are estimates.</p>
2010	As 2009
2011	As 2009
2012	As 2009
2013	As 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Assumptions were required in this instance:</p> <p>A. This method assumes that the largest purchased size is an appropriate representation of the replacement population</p> <p>B. This method assumes that the selected retirement rate is an accurate representation of reality. CitiPower/CitiPower refurbishment practices were considered as part of this assessment.</p> <p>C. This method assumes that the replacement cable metrics are proportional to that of the installed network for the given year.</p>
2010	As 2009
2011	As 2009
2012	As 2009
2013	As 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	<p>This method was selected as:</p> <p>A. Data was not available to provide a more accurate response</p> <p>B. Data was not available to provide a more accurate response</p>

	C. Data was not available to provide a more accurate response
2010	As 2009
2011	As 2009
2012	As 2009
2013	As 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.2 Repex	
Table name: 2.2.1 - COST METRICS BY ASSET CATEGORY	
Asset Group	Asset
Asset Failures	Poles Pole Top Structures Overhead Conductors Underground Cables Overhead and Underground LV Service Lines Public lighting Transformers Switchgear (HV Fuses and Surge Diverters)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

UNPLANNED ASSET REPLACEMENT:

5. REPLACEMENT CAPITAL EXPENDITURE

5.1 Table 2.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word "REFURBISHED". CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the sub-categorisation provisions set out in (a) do not account for an asset on CitiPower's distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 5.2 as per its respective instructions. CitiPower must ensure that the sum of the individual asset categories, including any additional subcategory, additional other asset category or asset refurbishment/ life extension asset category expenditure reconciles to the total expenditure of the asset group.

(d) CitiPower must ensure that the replacement volumes by asset group is equal to the applicable replacement volume data provided in table 2.2.2.

(e) CitiPower must ensure that the sum of the asset group replacement expenditures is equal to the total replacement expenditure contained in regulatory template 2.1.

(f) If CitiPower has provided estimated expenditure data on the basis of historical data that has included works across asset groups CitiPower must provide the asset age profile data in regulatory template 5.2 against the most

elementary asset category. For example, where CitiPower replaces pole-mounted switchgear in conjunction with a pole-top structure it must report the asset age profile data against the relevant switchgear asset category. CitiPower must provide documentation of instances where backcast unit costs generated have involved allocations of historical records that include expenditure across asset groups

Please provide a Response in this box:

Unplanned Asset Replacements:

5.1 Table 2.2.1

- (a) Unplanned Asset Replacement costs and volumes for asset categories are provided in table 2.2.1.
- (b) Not Applicable
- (c) Additional asset subcategories have been included as required.
- (d) Not Applicable
- (e) CitiPower has ensured that the total replacement expenditure in Template 2.2 is equal to the total replacement expenditure in Template 2.1
- (f) CitiPower has provided all asset age profile data in Template 5.2

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³¹ data green**; and **ESTIMATED³²/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Unplanned Asset Replacement PM Orders are allocated into two specific function codes that distinguish between:

- assets that were replaced as unplanned due to its failure outside of the network's maintenance strategies (maintenance related), and
- assets that were replaced as unplanned for other reasons (non-maintenance related, such as weather, not recoverable third party damage, etc).

This data has been summated for the purpose of this Analysis

Expenditure:

The total Unplanned Asset Replacement Expenditure for each year is provided by Regulatory Accounting group from data obtained from SAP for both maintenance related fault capital and non maintenance related fault capital expenditure.

Asset Volumes:

The Unplanned Asset Replacement Volume data was obtained from the materials booked in PM Order detail as recorded in SAP, and allocated according to each asset category and sub-category.

³¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Table 2.2.1</p> <p>– Methodology & Assumptions – Unplanned Asset Replacement Expenditure Data Expenditure is captured at PM Order level; a PM Order may contain 1 item or a mix of different items, and therefore it is not possible to report accurately on the cost of replacement of individual items. Unplanned Asset replacement costs by material and voltage were derived using bottom up estimates and actual overall expenditure.</p> <p>– Methodology & Assumptions – Unplanned Asset Replacement Volumes Data Unplanned Asset Replacement Volume data has been populated by obtaining the material data for each PM Order, grouping the numbers for each asset sub category and aligning to the relevant Category Analysis definition, and summing each category’s volume data. This was undertaken for each year as required.</p>
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why was an estimate required, including why it is not possible to use actual data;
2009	<p>Table 2.2.1 – Reason for estimate – Expenditure Data While total costs for Unplanned Asset Replacement are captured in SAP, the cost based on asset category is estimated because each PM Order may contain 1 item or a mix of different items, and therefore it is not possible to report accurately on the cost of individual items.</p> <p>Table 2.2.1 – Reason for estimate – Physical Data</p> <p>Overhead Conductors, Underground Cables: Overhead conductor and underground cable lengths are captured in the PM Orders in SAP, with the specific voltage categories estimated based on our classification being broadly assigned as LV or HV.</p> <p>Service Lines: The Circuit length of Service Lines is not captured within the PM Orders for Unplanned Asset Replacement recorded in SAP.</p>
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Table 2.2.1 – Basis for estimate – Expenditure Data Total costs for Unplanned Asset Replacement are captured using PM Orders under specific Function Codes. Using the known physicals by voltage and material, the total expenditure, and a bottom up estimate of a site cost per unit the expenditure per category was derived. The following steps are used to calculate the cost of asset replacement by category:</p> <ul style="list-style-type: none"> • Gross cost of asset category = asset volumes X average unit rate of asset replacement historical data. • % of each asset category = gross cost of each category / sum of gross costs of asset categories. • Final cost of asset category = % of each asset category X total year expenditure of unplanned asset replacement.

	<p>Table 2.2.1 – Basis for estimate – Volume Data</p> <p>Overhead Conductors, Underground Cables Overhead conductor and underground cables captured in the PM Orders in SAP have a Technical Standards material group designation as LV or HV and OH or UG, and have been assigned to each asset category based on this designation.</p> <p>Service Lines: An average service length of 15m is used for calculating a unit rate for service replacement jobs. Using the total number of service replacement jobs multiplied by 15m was used to derive the volume figure for service lines. 15m service per replacement job is based on historical data and professional judgement for building up the unit rate.</p>
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	<p>Table 2.2.1 – Reason for selected approach – Expenditure Data The selected approach was considered the best estimate, as the data was derived using actuals as the base.</p> <p>Table 2.2.1 – Reason for selected approach – Physical Data</p> <p>Overhead Conductors, Underground Cables The selected approach was considered the best estimate, as the data was derived using actuals as the base.</p> <p>Service Lines: The selected approach was considered the best estimate, as the data was derived using actuals as the base.</p>
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

<p>Response: Not Applicable</p>
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G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

2.3 Augex

AER CATEGORY ANALYSIS RIN

Tab name: 2.3 Augex	
Table name: 2.3.1 - AUGEX ASSET DATA - SUBTRANSMISSION SUBSTATIONS, SWITCHING STATIONS AND ZONE SUBSTATIONS	
Asset Group	Asset Category
ALL Categories	ALL Categories

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Appendix E - 7.2 Table 2.3.1 (on regulatory template 2.3) instructions:

- (a) For projects with a total cumulative expenditure over the life of the project of greater than or equal to \$5 million (nominal):
- (i) insert a row for each augmentation project on a subtransmission substation, switching station and zone substation owned and operated by CitiPower where project close occurred at any time in the years specified; and
 - (ii) input the required details.
- (b) For projects with a total cumulative expenditure over the life of the project less than \$5 million (nominal) (non material projects):
- (i) input the total expenditure for all non material augmentation projects on a subtransmission substation, switching station and zone substation owned and operated by CitiPower where project close occurred in the years specified in the penultimate row in the table, as indicated.
- (c) Record all expenditure data on a project close basis in real dollars (\$2012–13). CitiPower must not include data for augmentation works where project close occurs after the years specified but incurs expenditure prior to this date.
- (i) CitiPower must provide any calculations used to convert real to nominal dollars or nominal to real dollars for this purpose.
- (d) For the avoidance of doubt, this includes augmentation works on any substation in CitiPower 's network, including those which are notionally operating at transmission voltages. In such cases, choose 'Other - specify' in the 'Substation type' category and describe the type of substation in the basis of preparation.
- (e) Each row must represent data for an augmentation project for an individual substation.
- (i) If an augmentation project applies to two substations, for example, CitiPower must enter data for the two substations in two rows.
- (f) Where a substation augmentation project in this table is related to other projects (including those in other tables in regulatory template 2.3), describe this relationship in the basis of preparation.
- (g) Where CitiPower chooses 'Other - specify' in a drop down list, it must provide details in the basis of preparation.
- (h) For 'Substation ID' and 'Project ID', input CitiPower's identifier for the substation and project, respectively. This may be the substation/project name, location and/or code.
- (i) For 'Project trigger', choose the primary trigger for the project from the drop down list. Describe secondary triggers in the basis of preparation. Where there is no primary trigger (among multiple triggers), choose 'Other – specify' and describe the triggers in the basis of preparation.
- (j) For substation voltages, enter voltages in the format xx/xx, reflecting the primary and secondary voltages. For example, a transformer may have its voltage recorded as 500/275, where 500kV is the primary voltage and 275kV is the secondary voltage.

(i) Where a tertiary voltage is applicable, enter voltages in the format xx/xx/xx. For example, a transformer may have its voltage recorded as 220/110/33, where 220kV, 110kV and 33kV are the primary, secondary and tertiary voltages, respectively.

(k) For substation ratings, 'Pre' refers to the relevant characteristic prior to the augmentation work; 'Post' refers to the relevant characteristic after the augmentation work. Where a rating metric does not undergo any change, or where the project relates to the establishment of a new substation, input the metric only in the 'Post' column.

(l) Under 'Total expenditure' for transformers, switchgear, capacitors, and other plant items, include only the procurement costs of the equipment. This must not include installation costs.

(m) Expenditure inputted under the 'Land and easements' columns is mutually exclusive from expenditure that appears in the columns that sum to the 'Total direct expenditure' column. In other words, the 'Total direct expenditure' for a particular project must not include expenditure inputted into the 'Land and easements' columns.

(n) If CitiPower records land and easement projects and/or expenditures as separate line items for regulatory purposes, select 'Other – specify' and note 'Land/easement expenditure' in the basis of preparation.

(i) CitiPower must input expenditure directly attributable to the land purchase or easement compensation payments in the 'Land purchases' and 'Easements' columns, respectively. These costs include legal, stamp duties and cost of purchase or easement compensation payments.

(ii) CitiPower must input other expenditure attributable to land purchases and easements in the 'Other expenditure – Other direct' column.

(o) Insert additional rows as required.

(p) Definitions: Other plant item

(i) All equipment involved in utilising or transmitting electrical energy that are not transformers, switchgear, or capacitors.

Response:

The information in table 2.3.1 is consistent with the requirements stated in the CA RIN notice.

Citipower has reported on augmentation type subtransmission substation, switching station and zone substation projects, provided project description data which includes standard internal ratings and how they were derived, and extracted project expenditure into the appropriate plant, contract, easement or other expenditure type formats.

Individual projects have been reported on that had both a direct expenditure over \$2 million (nominal) and a project close that occurred between 2009-2013. A non-material project row contains all other augmentation type subtransmission substation, switching station and zone substation expenditure that occurred between 2009-2013.

Individual project expenditure had been provided in real \$2013 dollars and the calculation factors to convert from nominal to real \$2013 dollars have been provided in this Basis of Preparation.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³³ data green**; and **ESTIMATED³⁴/derived data red**

³³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Zone Substation projects over the \$2 million reporting threshold were identified using an internal Business Warehouse report (transaction F220) and internal network planning augmentation projects lists. Projects over \$2 million direct expenditure were also included to give the AER more information on Citipower’s subtransmission substation, switching station and zone substation expenditure.

The Project Type and Project Trigger types were manually obtained from the scope documents of each project. Scope documents were extracted from either SAP Networks (CN23 transaction) or internal network planning drives.

Substation Rating values were taken from previous Distribution System Planning Reports (DSPR) over the period of 2008 to 2012. The Normal Cyclic values were taken from the nameplate values of the transformers, as that is the rating specified by the manufacturer for continuous operation at a normal rate of wear. The N-1 Emergency values were taken from the Cyclic N-1 Rating values in the DSPRs. They are the rating Citipower is willing to accept the risk for, understanding that an accelerated rate of wear will occur, under conditions where the loss of another transformer at the station has occurred.

The Total Direct Expenditure Category for each individual project was obtained using SAP financial reporting (ZF21 transaction) and an excel spreadsheet template, which was used to exclude any Citipower overheads, any land purchase or easement costs, and provide a direct expenditure value.

The Years Incurred column was calculated using the expenditure periods obtained in the SAP financial reporting (ZF21 transaction).

The All Non Related Party Contracts expenditure was calculated by adding all contract and material expenditure, excluding labour, as all materials are purchased by Citipower using contracts with individual manufacturers or suppliers.

Land purchase expenditure was extracted by running a SAP financial report (ZF21 transaction) against Citipower’s internal cost code for land purchases. Easement expenditure was extracted using the same SAP financial report against Citipower’s internal cost code for easement expenditure.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Projects over \$2 million direct expenditure were reported on individually to give the AER more information on Citipower’s subtransmission substation, switching station and zone substation expenditure between 2009-2013. All expenditure costs were extracted from the same SAP financial reporting method and transferred to real \$2013 dollar values to ensure consistency.</p> <p>The following escalation factors were used to convert expenditure from nominal dollars to real \$2013 dollars:</p> <p>Year – Factor 2005 – 26.80% 2008 – 16.30% 2009 – 12.10% 2010 – 9.50% 2011 – 5.80%</p>

Year	Methodology & Assumptions
	<p>2012 – 2.60%</p> <p>Figures for units added, MVA added and MVAR added were all extracted from scope documents or items purchased in a project's SAP network. Using the same data sources per project ensured consistency and the two different data sources allowed for validation of the data.</p> <p>For Plant and Equipment expenditure, SAP financial reporting (ZF21 transaction) was used to extract costs and units added for the different categories of plant (transformers, switchgear, capacitors, other plant items and installation). Large items of plant were validated against the actual contract documents. Switchgear was identified by manually going through the materials list in the project's SAP network. The volume figure of the installation (labour) component is the total man hours Citipower employees spent on the project, which was extracted using SAP reporting (CN48N transaction). Units added figures for items of plant were also validated against project scopes.</p> <p>The Non-Material Projects Total Direct Expenditure was calculated by subtracting the overall actual augmentation expenditure for subtransmission substations, switching stations and zone substations between the 2009 to 2013 period by the addition of the total direct expenditure of the individual projects that were reported on. Any individual projects reported on that contained actual expenditure before 2009 had those costs removed. Any land purchase or easement expenditure was also excluded from all total direct expenditure values.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	An estimate was required as the AER RIN noticed required that all expenditure data on a <i>project close</i> basis be in 2013 real dollars and not in any other year.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	See methodology and assumptions section for the basis for the estimate (includes the approach used). Only the approach in this section was considered (no other options were considered).
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	The discount rates were used to convert 2009-2012 dollar figures to 2013 real dollars as requested by the AER. This approach is the only approach that can be used to convert expenditure from nominal dollars to real \$ 2013. The discount rates used were the most appropriate because they take into account the inflation and other budget assumptions.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.3 Augex	
Table name: 2.3.2 - AUGEX ASSET DATA - SUBTRANSMISSION LINES	
Asset Group	Asset Category
ALL Categories	ALL Categories

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Appendix E - 7.3 Table 2.3.2 (on regulatory template 2.3) instructions:

(a) For projects with a total cumulative expenditure over the life of the project of greater than or equal to \$5 million (nominal):

- (i) insert a row for each augmentation project on a subtransmission line owned and operated by CitiPower where project close occurred at any time during the years specified; and
- (ii) input the required details.

(b) For projects with a total cumulative expenditure over the life of the project less than \$5 million (nominal) (non material projects):

- (i) input the total expenditure for all non material augmentation projects on subtransmission lines owned and operated by CitiPower where project close occurred in the years specified in the penultimate row in the table, as indicated.

(c) Record all expenditure data on a project close basis in real dollars (\$2012–13). Hence, CitiPower must not include data for augmentation works where project close occurs after the years specified but incurs expenditure prior to this date.

- (i) CitiPower must provide any calculations used to convert real to nominal dollars or nominal to real dollars for this purpose.

(d) For the avoidance of doubt, this includes augmentation works on any subtransmission line in CitiPower's network. If CitiPower owns and operates any lines or cables notionally operating at transmission voltages, record any augmentation expenditure relating to such lines or cables in this table.

(e) Each row should represent data for all circuits of a given voltage subject to augmentation works under the Project ID.

- (i) If an augmentation project applies to two circuits of the same voltage, for example, CitiPower must enter data for the two circuits in one row.
- (ii) If an augmentation project applies to two circuits of different voltages, for example, CitiPower must enter data for the two circuits in two rows

(f) Where a subtransmission lines augmentation project in this table is related to other projects (including those in other tables in regulatory template 2.3), describe this relationship in the basis of preparation.

(g) Where CitiPower chooses 'Other - specify' in a drop down list, provide details in the basis of preparation.

(h) For 'Line ID', input CitiPower's identifier for the circuit(s) subject to augmentation works under the Project ID. This may be the circuit name(s), location and/or code.

(i) For 'Project ID', input CitiPower's identifier for the project. This may be the project name, location and/or code.

(j) For 'Project trigger', choose the primary trigger for the project from the drop down list. Describe secondary triggers in the basis of preparation. Where there is no primary trigger (among multiple triggers), choose 'Other – specify' and describe the triggers in the basis of preparation.

(k) For length metrics, 'km added' refers to the gross addition of the relevant length measure resulting from the augmentation work.

(i) This must not be net of line or cable removal. If the augmentation project includes line or cable removal, describe the amount in basis of preparation.

(l) Under 'Total expenditure' for poles/towers, include the procurement costs of the equipment and civil works. This must not include installation costs.

(m) Under 'Total expenditure' for lines, cables and 'other plant item', respectively, include only the procurement costs of the equipment. This must not include installation costs.

(n) Under 'Total expenditure' for civil works, do not include civil works expenditure related to poles/towers. As a guide, expenditure CitiPower may input under 'Other expenditure – Civil works' includes (but is not limited to) construction of access tracks, construction pads and vegetation clearance.

(o) Expenditure inputted under the 'Land and easements' columns is mutually exclusive from expenditure that appear in the columns that sum to the 'Total direct expenditure' column. In other words, the 'Total direct expenditure' for a particular project must not include expenditure inputted into the 'Land and easements' columns.

(p) If CitiPower records land and easement projects and/or expenditures as separate line items for regulatory purposes, select 'Other – specify' and note 'Land/easement expenditure' in the basis of preparation.

(i) CitiPower must input expenditure directly attributable to the land purchase or easement compensation payments in the 'Land purchases' and 'Easements' columns, respectively. These costs include legal, stamp duties and cost of purchase or easement compensation payments.

(q) CitiPower must input other expenditure attributable to land purchases and easements in the 'Other expenditure – Other direct' column.

(r) Insert additional rows as required.

(s) Definitions: Other plant item

(i) All equipment involved in utilising or transmitting electrical energy that are not poles/towers (including pole top or tower structures), lines or cables.

Response:

The information in table 2.3.2 is consistent with the requirements stated in the CA RIN notice.

Citipower has reported on augmentation type subtransmission line projects, provided project description data, and extracted project expenditure into the appropriate plant, contract, easement or other expenditure type formats.

Individual projects have been reported on that had both a direct expenditure over \$2 million (nominal) and a project close that occurred between 2009-2013. A non-material project row contains all other augmentation type subtransmission line expenditure that occurred between 2009-2013.

Individual project expenditure had been provided in real \$2013 dollars and the calculation factors to convert from nominal to real \$2013 dollars have been provided in this Basis of Preparation.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁵ data green**; and **ESTIMATED³⁶/derived data red**

³⁵ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Subtransmission projects over the \$2 million reporting threshold were identified using an internal Business Warehouse report (transaction F220) and internal network planning augmentation projects lists. Projects over \$2 million direct expenditure were also included to give the AER more information on Citipower's subtransmission line expenditure.

The Project Type and Project Trigger types were manually obtained from the scope documents of each project. Scope documents were extracted from either SAP Networks (CN23 transaction) or internal network planning drives. The Route Line Length Added was obtained by analysing the actual drawings for each individual project reported on.

The Other Direct expenditure was also extracted using SAP financial reporting (ZF21 transaction) and for the projects reported on was determined to be the remaining expenditure not associated with plant and equipment, land purchase or easement expenditure.

The Total Direct Expenditure Category for each individual project was obtained using SAP financial reporting (ZF21 transaction) and an excel spreadsheet template, which was used to exclude any Citipower overheads, any land purchase or easement costs, and provide a direct expenditure value.

The Years Incurred column was calculated using the expenditure periods obtained in the SAP financial reporting (ZF21 transaction).

The All Non Related Party Contracts expenditure was calculated by adding all contract and material expenditure, excluding labour, as all materials are purchased by Citipower using contracts with individual manufacturers or suppliers.

Land purchase expenditure was extracted by running a SAP financial report (ZF21 transaction) against Citipower's internal cost code for land purchases. Easement expenditure was extracted using the same SAP financial report against Citipower's internal cost code for easement expenditure.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Projects over \$2 million direct expenditure were reported on individually to give the AER more information on Citipower's subtransmission line expenditure between 2009-2013. All expenditure costs were extracted from the same SAP financial reporting method and transferred to real \$2013 dollar values to ensure consistency. The following escalation factors were used to convert expenditure from nominal dollars to real

purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	Methodology & Assumptions
	<p>\$2013 dollars:</p> <p>Year - Factor 2008 – 16.30% 2009 – 12.10% 2010 – 9.50% 2011 – 5.80% 2012 – 2.60%</p> <p>Figures for line lengths (both circuit kms added and upgraded) were all extracted manually using the drawings of individual projects, as this was seen as the most accurate source of data and was also the easiest way to identify whether a line was added or being upgraded.</p> <p>Citipower's internal accounting practices are set up in a way that the overall actual augmentation expenditure for subtransmission lines is grouped with the overall actual augmentation expenditure for HV feeders. The Total Direct Expenditure value for the Non-Material Projects row is a percentage split per year between subtransmission lines and HV feeder project expenditure using individual project expenditure.</p> <p>For Plant and Equipment expenditure, SAP financial reporting (ZF21 transaction) was used to extract costs for the different categories of plant (poles/towers, overhead lines, underground cables, other plant items and installation). To identify the items of plant, a manual analysis of the project using the material list in the SAP financial report was conducted. The poles/towers added and upgraded, and circuit km added and upgraded figures were taken from the scope documents as they are seen as the most accurate source of data. The volume figure of the installation (labour) component is the total manhours Citipower employees spent on the project, which was extracted using SAP reporting (CN48N transaction).</p> <p>The Non-Material Projects Total Direct Expenditure was calculated by subtracting the overall actual augmentation expenditure for subtransmission lines between the 2009 to 2013 period by the addition of the total direct expenditure of the individual projects that were reported on. Any individual projects reported on that contained actual expenditure before 2009 had those costs removed. Any land purchase or easement expenditure was also excluded from all total direct expenditure values.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable. An estimate was required as the AER RIN noticed required that all expenditure data on a project close basis be in 2013 real dollars and not in any other year.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable. See methodology and assumptions section for the basis for the estimate (includes the approach used). Only the approach in this section was considered (no other options were considered).
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
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Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not Applicable. The discount rates were used to convert 2009-2012 dollar figures to 2013 real dollars as requested by the AER. This approach is the only approach that can be used to convert expenditure from nominal dollars to real \$ 2013. The discount rates used were the most appropriate because they take into account the inflation and other budget assumptions.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.3 Augex	
Table name: 2.3.3 – Augex Asset Data – HV/LV Feeders and Distribution Substations.	
Asset Group	Asset Category
ALL Categories	ALL Categories

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the ‘response’ box below.]

HV Feeder

Appendix E 7.4 Table 2.3.3 (on regulatory template 2.3) instructions:

- (a) Complete the table by inputting the required details for:
 - (i) the rows that summarise all augmentation works on the specified types of HV feeders owned and operated by Citipower undertaken at any time during the years specified for projects with a total cumulative expenditure over the life of the project of greater than or equal to \$0.5 million (nominal); and
 - (ii) the row that summarises all augmentation works on HV feeders owned and operated by Citipower undertaken at any time during the years specified for projects with a total cumulative expenditure over the life of the project of less than \$0.5 million (nominal)
- (b) Record all expenditure data on an ‘as incurred’ basis in nominal dollars.
- (c) For projects that span across regulatory years, input figures for the ‘Circuit km added’ and ‘Circuit km upgraded’ columns according to the final year in which expenditure was incurred for the project.
- (d) Citipower must not include expenditure related to land purchases and easements in the ‘Total direct expenditure’ column. Land purchases and easements expenditure related to augmentation works on all HV feeders owned and operated by Citipower must be inputted in table 2.3.6.

Distribution Substations

Appendix E 7.5 Table 2.3.3 (on regulatory template 2.3) instructions:

- (a) Complete the table by inputting the required details for:
 - (i) the rows that summarises all augmentation works on the specified types of distribution substations owned and operated by Citipower undertaken at any time during the years specified.
- (b) Record all expenditure data on an ‘as incurred’ basis in nominal dollars.
- (c) For projects that span across regulatory years, input figures for the ‘Units’ column according to the final year in which expenditure was incurred.
- (d) Citipower must not include expenditure related to land purchases and easements in the ‘Total direct expenditure’ column. Land purchases and easements expenditure related to augmentation works on all distribution substations owned and operated by Citipower must be inputted in table 2.3.6.

LV Feeder

Appendix E 7.6 Table 2.3.3 (on regulatory template 2.3) instructions:

- (a) Complete the table by inputting the required details for:
 - (i) the rows that summarise all augmentation works on the specified types of LV feeders owned and operated by Citipower undertaken at any time during the years specified for projects with a total cumulative expenditure over the life of the project of greater than or equal to \$50,000 (nominal); and
 - (ii) the row that summarises all augmentation works on LV feeders owned and operated by Citipower undertaken at any time during the years specified for projects with a total cumulative expenditure over the life of the project of less than \$50,000 (nominal).
- (b) Record all expenditure data on an ‘as incurred’ basis in nominal dollars.
- (c) For projects that span across regulatory years, input figures for the ‘Circuit km added’ and ‘Circuit km upgraded’ columns according to the final year in which expenditure was incurred for the project.
- (d) Citipower must not include expenditure related to land purchases and easements in the ‘Total direct expenditure’ column. Land purchases and easements expenditure related to augmentation works on all LV feeders owned and

operated by Citipower must be inputted in table 2.3.6.

Response:

The information in table 2.3.3 is consistent with the requirements stated in the CA RIN notice.

HV Feeders

Citipower has provided units added and units upgraded per year, as well as direct expenditure for HV feeder augmentation projects with a direct expenditure over \$0.5 million (nominal) and a project close that occurred between 2009-2013. As shown in table 2.3.3 a further split of the HV feeders into overhead and underground types has been conducted. A non-material project row that contains all other augmentation type expenditure that occurred between 2009-2013 has been included for HV feeders. All direct project expenditure has been provided in nominal dollars. The units added or upgraded have been placed into the year in which expenditure last incurred for only material projects. The AER requirements were interpreted to only include material projects as they are of certain expenditure and meet the AER thresholds. No land purchase or easement expenditure has been included.

Distribution Substations

All distribution substation augmentation project units added, units upgraded and direct expenditure per year have been provided between the 2009-2013 period.

All direct project expenditure has been provided in nominal dollars. No land purchase or easement expenditure has been included.

As shown in table 2.3.3 a further split of the pole type, ground type and indoor type formats for distribution substations has been conducted. All direct project expenditure has been provided in nominal dollars and the units added or upgraded have been placed into the year in which expenditure last incurred for a project. No land purchase or easement expenditure has been included.

LV Feeders

Units added and units upgraded per year, as well as direct expenditure has been provided for LV augmentation projects with a direct expenditure over \$50,000 (nominal) and a project close that occurred between 2009-2013. As shown in table 2.3.3 a further split of the LV feeders into overhead and underground types has been conducted. A non-material project row that contains all other augmentation type expenditure that occurred between 2009-2013 has been included for LV feeders.

All direct project expenditure has been provided in nominal dollars. The units added or upgraded have been placed into the year in which expenditure last incurred for only material projects. The AER requirements were interpreted to only include material projects as they are of certain expenditure and meet the AER thresholds. No land purchase or easement expenditure has been included.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁷ data green**; and **ESTIMATED³⁸/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a

³⁷ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

2.3.3

- (1) HV Feeder Descriptor Metrics – SAP, “Functional Scope” Documentation and GIS (Geographic Information System) Data
- (2) LV Feeder Descriptor Metrics – SAP, “Functional Scope” Documentation and GIS (Geographic Information System) Data
- (3) Distribution Substations Descriptor Metrics – SAP and “Functional Scope” Documentation
- (4) HV Feeder Cost Metrics (Material Projects) – SAP and Total HV Feeder Costs determined in BOP 2.3.4
- (5) HV Feeder Cost Metrics (Non-Material Projects) – SAP and Total HV Feeder Costs determined in BOP 2.3.4
- (6) LV Feeder Cost Metrics (Material Projects) – SAP and Total LV Feeder Costs determined in BOP 2.3.4
- (7) LV Feeder Cost Metrics (Non-Material Projects) – SAP and Total LV Feeder Costs determined in BOP 2.3.4
- (8) Distribution Substations Cost Metrics – “CP PAL 2009 ~ 2013 Spend” Report and Total Distribution Substation Cost derived in BOP 2.3.4

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>2.3.3 Methodology</p> <p>(1) HV Feeder Descriptor Metrics – “AER Category Analysis” Report is used to identify the kilometres per project and then manually determine if they were either added or upgraded using the functional scope documents. The report summarises all the kilometres added by project and category (overhead or underground) from the “Functional Scope” Documentation which is the underlying source documentation. The “Functional Scope” document is initially created using the GIS (Geographic Information System) which measures the distance required for the HV Feeder. The staff manually identify the timing of the additions by looking into the individual project reports.</p> <p>(2) LV Feeder Descriptor Metrics – “AER Category Analysis” Report is used to identify the kilometres per project and then manually determine if they were either added or upgraded using the functional scope documents. The report summarises all the kilometres added by project and category (overhead or underground) from the “Functional Scope” Documentation which is the underlying source documentation. The “Functional Scope” document is initially created using the GIS (Geographic Information System) which measures the distance required for the LV Feeder. The staff manually identify the timing of the additions by looking into the individual project reports.</p> <p>(3) Distribution Substations Descriptor Metrics – “AER Category Analysis” Report is used to identify the kilometres per project and then manually determine if they were either added or upgraded using the functional scope documents. The report summarises all the units added by project and category (poles, ground and indoor) from the “Functional Scope” Documentation which is the underlying source documentation. The “Functional Scope” document is initially created depicting the number of transformer units needed for the project. The staff manually identify the timing of the additions by looking into the individual project reports.</p> <p>(4) HV Feeder Cost Metrics (Material Projects) – Citipower staff identify the split between material and non-material projects by extracting data from SAP and populating financial information in “AER Category Analysis” Report. Citipower staff also determine the % split between Overhead and Underground costs by project in the “AER Category Analysis” Report. Both the % for material v non-material projects and Underground v Overhead Projects are applied to the Total HV Feeder Costs as determined in 2.3.4.</p> <p>(5) HV Feeder Cost Metrics (Non-Material Projects) – Citipower staff identify the split between material and non-material projects by extracting data from SAP and populating financial information in “AER Category Analysis” Report. The % for material v non-material projects is then applied to the Total HV Feeder Costs (as determined in 2.3.4) to arrive at the non-material HV Feeder Project Cost.</p> <p>(6) LV Feeder Cost Metrics (Material Projects) – Citipower staff identify the split between material and non-material projects by extracting data from SAP and populating financial information in “AER Category Analysis” Report. Citipower staff also determine the % split between Overhead and Underground costs by project in the “AER Category Analysis” Report. Both the % for material v non-material projects and Underground v Overhead Projects are applied to the Total LV Feeder Costs as determined in 2.3.4.</p>

Year	Methodology & Assumptions
	<p>(7) LV Feeder Cost Metrics (Non-Material Projects) – Citipower staff identify the split between material and non-material projects by extracting data from SAP and populating financial information in “AER Category Analysis” Report. The % for material v non-material projects is then applied to the Total LV Feeder Costs (as determined in 2.3.4) to arrive at the non-material LV Feeder Project Cost.</p> <p>(8) Distribution Substations Cost Metrics –Total cost in the Asset Category is determined in BOP 2.3.4. The cost data is then split between Pole, Ground and Indoor using the “CP PAL 2009 ~ 2013 Spend” Report. Citipower staff split the projects in the report by Pole, Mounted and Indoor” Projects and derive a ratio for the split between the three Distribution Substation categories. The ratio is applied against the total cost for Distribution Substations as derived in 2.3.4 to determine the actual costs across the three categories.</p> <p>2.3.3 Assumptions</p> <p>(1) HV Feeder Descriptor Metrics – GIS is accurate and all complete projects are included in AER Category Analysis. Staff are able to pick out the circuit kilometres added / upgrade correctly from the individual project reports and are able to allocate the circuit kilometre additions in the correct year.</p> <p>(2) LV Feeder Descriptor Metrics – GIS is accurate and all complete projects are included in AER Category Analysis. Staff are able to pick out the circuit kilometres added / upgrade correctly from the individual project reports and are able to allocate the circuit kilometre additions in the correct year.</p> <p>(3) Distribution Substations Descriptor Metrics – Citipower staff inputted the correct units added in “Functional Scope” Report on initial setup of the project. Total kilometres added per the AER Category Report are complete.</p> <p>(4) HV Feeder Cost Metrics (Material Projects) – Staff have the expertise in identifying and extracting the required data within SAP for material projects and project split between Overhead and Underground Costs. As the % split for the Material v Non-Material as well as Overhead vs Underground Costs is determined via a separate report (AER Category Analysis” Report), there is an assumption that the % split is still relevant for the total costs derived from the relevant Function Codes (FC) within SAP.</p> <p>(5) HV Feeder Cost Metrics (Non-Material Projects) – Staff have the expertise in identifying and extracting the required data within SAP for non-material projects. As the % split for the Material v Non-Material is determined via a separate report (AER Category Analysis” Report), there is an assumption that the % split is still relevant for the total costs derived from the relevant Function Codes (FC) within SAP.</p> <p>(6) LV Feeder Cost Metrics (Material Projects) – Staff have the expertise in identifying and extracting the required data within SAP for material projects and project split between Overhead and Underground Costs. As the % split for the Material v Non-Material as well as Overhead vs Underground Costs is determined via a separate report (AER Category Analysis” Report), there is an assumption that the % split is still relevant for the total costs derived from the relevant Function Codes (FC) within SAP.</p> <p>(7) LV Feeder Cost Metrics (Non-Material Projects) – Staff have the expertise in identifying and extracting the required data within SAP for non-material projects. As the % split for the Material v Non-Material is determined via a separate report (AER Category Analysis” Report), there is an assumption that the % split is still relevant for the total costs derived from the relevant Function Codes (FC) within SAP.</p> <p>(8) Distribution Substations Cost Metrics – Staff have the expertise in identifying and extracting the required data within SAP for project that are split between Pole, Mounted and Indoor Distribution Sub-Station Costs. As the % split for the three categories is determined via a separate report (“CP PAL 2009 ~ 2013 Spend” Report), there is an assumption that the % split is still relevant for the total costs derived from the relevant Function Codes (FC) within SAP.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	For all asset groups, an estimate was used (financial or non-financial data) because SAP is not set up in a way that allows a direct dump of information by the specified asset groups. Even actual financial data used is manually assessed by the staff to determine whether it relates to the correct category.
2010	As per 2009
2011	As per 2009

2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per Section D. No other options were considered as there is no other way of deriving estimates other than the approach used by Citipower.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	<p>(1) HV Feeder Descriptor Metrics – The approach mentioned in section D was selected because there was no direct data setup in SAP that allowed us to get a direct data dump of the split between the different categories. The manual process of checking functional scope documents/GIS to get the relevant data was done as there was no other way to get the information without compromising the integrity of the estimate.</p> <p>(2) LV Feeder Descriptor Metrics – The approach mentioned in section D was selected because there was no direct data setup in SAP that allowed us to get a direct data dump of the split between the different categories. The manual process of checking functional scope documents/GIS to get the relevant data was done as there was no other way to get the information without compromising the integrity of the estimate.</p> <p>(3) Distribution Substations Descriptor Metrics – The approach mentioned in section D was selected because there was no direct data setup in SAP that allowed us to get a direct data dump of the split between the different categories. The manual process of checking functional scope documents/GIS to get the relevant data was done as there was no other way to get the information without compromising the integrity of the estimate.</p> <p>(4) HV Feeder Cost Metrics (Material Projects) – The approach mentioned in section D was selected because there was no direct financial data setup in SAP that allowed us to get a direct data dump of the split between the different categories and this was the best method to estimate as there was no other way to derive the information without judgementally selecting the costs and allocating them across the different cost types.</p> <p>(5) HV Feeder Cost Metrics (Non-Material Projects) – The approach mentioned in section D was selected because there was no direct financial data setup in SAP that allowed us to get a direct data dump of the split between the different categories and this was the best method to estimate as there was no other way to derive the information without judgementally selecting the costs and allocating them across the different cost types.</p> <p>(6) LV Feeder Cost Metrics (Material Projects) – The approach mentioned in section D was selected because there was no direct financial data setup in SAP that allowed us to get a direct data dump of the split between the different categories and this was the best method to estimate as there was no other way to derive the information without judgementally selecting the costs and allocating them across the different cost types.</p> <p>(7) LV Feeder Cost Metrics (Non-Material Projects) – The approach mentioned in section D was selected because there was no direct financial data setup in SAP that allowed us to get a direct data dump of the split between the different categories and this was the best method to estimate as there was no other way to derive the information without judgementally selecting the costs and allocating them across the different cost types.</p> <p>(8) Distribution Substations Cost Metrics – The approach mentioned in section D was selected because there was no direct financial data setup in SAP that allowed us to get a direct data dump of the split between the different categories and this was the best method to estimate as there was no other way to derive the information without judgementally selecting the costs and allocating them across the different cost types.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:	
Cost Metrics with nil value have no data provided:	Reason For the nil value
2009 – 2013 LV FEEDER AUGMENTATIONS - OVERHEAD LINES (\$000'S)	No material overhead LV projects
2009 – 2013 DISTRIBUTION SUBSTATION AUGMENTATIONS - GROUND MOUNTED (\$000'S)	No ground mounted in Citipower
2009 LV FEEDER AUGMENTATIONS - UNDERGROUND CABLES (\$000'S)	No material underground LV projects in 2009
Descriptor Metrics with nil value have no data provided:	Reason For the nil value
2009 – 2013 DISTRIBUTION SUBSTATION AUGMENTATIONS - GROUND MOUNTED	No ground mounted in Citipower
DISTRIBUTION SUBSTATION AUGMENTATIONS – Indoor/Pole Mounted [Units added and upgraded]	For rows that have a nil value for these categories, it indicates that there were no 'material' projects for these categories in their respective years. I can confirm that the zero value in these fields is not an accidental omission.
HV FEEDER AUGMENTATIONS – Overhead / Underground LINES (circuit ling length km) [Units added and upgraded]	For rows that have a nil value for these categories, it indicates that there were no 'material' projects for these categories in their respective years. I can confirm that the zero value in these fields is not an accidental omission.
LV FEEDER AUGMENTATIONS – Overhead / Underground LINES (circuit ling length km) [Units added and upgraded]	For rows that have a nil value for these categories, it indicates that there were no 'material' projects for these categories in their respective years. I can confirm that the zero value in these fields is not an accidental omission.

G. **Data Quality colour coding**

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.3 Augex	
Table name: 2.3.4 – Augex Data – Total Expenditure	
Asset Group	Asset Category
ALL Categories	ALL Categories

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Table 2.3.4 instructions:

- (a) CitiPower must input the total *augmentation* expenditure for each asset group split by the groupings specified by the table.
- (i) Record all expenditure data on an 'as incurred' basis in nominal dollars.
- (b) CitiPower must explain how the sum of the asset group *augmentation* expenditures reconciles to the *augmentation* expenditure in tables 2.3.1 to 2.3.5.
- (c) Expenditure inputted under the 'Land and *easements*' rows are mutually exclusive from expenditure that appear in the rows for the corresponding asset group. For example, *augex* attributed to *HV feeders* must not include expenditure related to '*HV feeders* – land purchases and *easements*'.

Response:

The information in table 2.3.6 is consistent with the requirements stated in the CA RIN notice.

SUBTRANSMISSION SUBSTATIONS, SWITCHING STATIONS, ZONE SUBSTATIONS

The total *augmentation* expenditure for this category was provided in the specified table. All expenditure data provided for this category was on an 'as incurred' basis in nominal dollars. The sum of the asset group *augmentation* expenditure is made up of individual projects which are either classified as material projects or non material projects. These individual components have their *augmentation* expenditure in tables 2.3.1 to 2.3.5 and the summations of these components make up the asset group *augmentation* expenditure.

SUBTRANSMISSION LINES

The total *augmentation* expenditure for this category was provided in the specified table. All expenditure data provided for this category was on an 'as incurred' basis in nominal dollars. The sum of the asset group *augmentation* expenditure is made up of individual projects which are either classified as material projects or non material projects. These individual components have their *augmentation* expenditure in tables 2.3.1 to 2.3.5 and the summations of these components make up the asset group *augmentation* expenditure.

HV FEEDERS

The total *augmentation* expenditure for this category was provided in the specified table. All expenditure data provided for this category was on an 'as incurred' basis in nominal dollars. The sum of the asset group *augmentation* expenditure is made up of individual projects which are either classified as material projects or non material projects. These individual components have their *augmentation* expenditure in tables 2.3.1 to 2.3.5 and the summations of these components make up the asset group *augmentation* expenditure.

DISTRIBUTION SUBSTATIONS

The total *augmentation* expenditure for this category was provided in the specified table. All expenditure data provided for this category was on an 'as incurred' basis in nominal dollars. . The sum of the asset group *augmentation* expenditure is made up of individual projects which are either classified as material projects or non material projects. These individual components have their *augmentation* expenditure in tables 2.3.1 to 2.3.5 and the summations of these components make up the asset group *augmentation* expenditure.

LV FEEDERS

The total *augmentation* expenditure for this category was provided in the specified table. All expenditure data provided for this category was on an 'as incurred' basis in nominal dollars. The sum of the asset group augmentation expenditure is made up of individual projects which are either classified as material projects or non material projects. These individual components have their augmentation expenditure in tables 2.3.1 to 2.3.5 and the summations of these components make up the asset group augmentation expenditure.

DISTRIBUTION SUBSTATIONS - LAND PURCHASES AND EASEMENTS

Citipower did not have any expenditure in this category.

HV FEEDERS - LAND PURCHASES AND EASEMENTS

Citipower did not have any expenditure in this category.

LV FEEDERS - LAND PURCHASES AND EASEMENTS

Citipower did not have any expenditure in this category.

OTHER ASSETS – SCADA – FC168 and FC 169

There is a need to clearly distinguish Augex expenditure for SCADA.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁹ data green**; and **ESTIMATED⁴⁰/derived data red**
 For the category 'other assets'"

2009	2010	2011	2012	2013
------	------	------	------	------

For the rest of the categories:

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

2.3.4

SUBTRANSMISSION SUBSTATIONS, SWITCHING STATIONS, ZONE SUBSTATIONS – “CP PAL 2009 ~ 2013 Spend” Report, FC161 and FC177 data from SAP.

SUBTRANSMISSION LINES – “CP PAL 2009 ~ 2013 Spend” Report, FC161, FC162 and FC177 data from SAP.

HV FEEDERS and HV FEEDERS - LAND PURCHASES AND EASEMENTS – “CP PAL 2009 ~ 2013 Spend” Report and FC162 data from SAP.

³⁹ “Actual Information” is defined as “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.
 ‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁴⁰ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

DISTRIBUTION SUBSTATIONS and DISTRIBUTION SUBSTATIONS - LAND PURCHASES AND EASEMENTS and LV FEEDERS and LV FEEDERS - LAND PURCHASES AND EASEMENTS – “Supply Quality Financials” Report and FC160 data from SAP.

OTHER ASSETS – This data is derived straight from SAP function code 168 and 169 from SAP

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Methodology</p> <p>2.3.4</p> <p>SUBTRANSMISSION SUBSTATIONS, SWITCHING STATIONS, ZONE SUBSTATIONS– The only relevant category in the asset group for Citipower is Zone Substations. Zone substation Costs and the Sub-transmission Line Costs are grouped together under FC161 and FC177. “CP PAL 2009 ~ 2013 Spend” Report is used to determine the % split of the Between the Zone Substations and Sub-transmission Lines which is then applied to SAP FC161 and FC177. “CP PAL 2009 ~ 2013 Spend” Report is collated by the staff with Zone Sub-station Costs and Sub-transmission Line Costs identified and split by the projects. The % split between Zone Sub-stations and Sub-transmission Lines are then applied to the total cost as per SAP FC161 and FC177.</p> <p>SUBTRANSMISSION LINES – The total cost for sub-transmission lines are the residual of FC161, FC162 and FC177 after costs are allocated from FC161 and FC177 to “SUBTRANSMISSION SUBSTATIONS, SWITCHING STATIONS, ZONE SUBSTATIONS” and from FC162 to “HV FEEDERS”. Refer to “SUBTRANSMISSION SUBSTATIONS, SWITCHING STATIONS, ZONE SUBSTATIONS” and “HV FEEDERS” sections for the methodology applied.</p> <p>HV FEEDERS and HV FEEDERS - LAND PURCHASES AND EASEMENTS – “CP PAL 2009 ~ 2013 Spend” Report is used to determine the % split of the HV Feeders which is then applied to SAP FC162. “CP PAL 2009 ~ 2013 Spend” Report is collated by the staff with HV Feeder Costs and Sub-transmission Line Costs identified and split by the projects. Citipower determine the % split between HV Feeder and Sub-transmission Line in the “CP PAL 2009 ~ 2013 Spend” Report and apply the % to the total cost as per SAP FC162.</p> <p>DISTRIBUTION SUBSTATIONS and DISTRIBUTION SUBSTATIONS - LAND PURCHASES AND EASEMENTS and LV FEEDERS and LV FEEDERS - LAND PURCHASES AND EASEMENTS – Distribution substations and LV Feeders have been grouped together as the data comes from the same source. Citipower determine the % split of LV Feeders and Distribution Substations by classifying the projects as either LV Feeder or Distribution in the “Supply Quality Financials” Report. The classification of the different asset categories is performed manually by Citipower staff. The % split is then applied to the SAP FC160 account to split the costs between Distribution Substations and LV Feeder. Note: There was no split data available of the % split for Citipower for FY2012 and FY2013. As such, Citipower used the % split from 2011 as the % for FY2012 and FY2013.</p> <p>OTHER ASSETS – Not applicable to CitiPower as the data is derived straight from SAP function code 168 and 169</p> <p>Assumptions used</p> <p>2.3.4</p> <p>SUBTRANSMISSION SUBSTATIONS, SWITCHING STATIONS, ZONE SUBSTATIONS – Staff have the expertise in identifying and extracting the required data within SAP for projects that are split between Zone Substations and Sub-transmission Lines. As the % split for the asset categories is determined via a separate report (“CP PAL 2009 ~ 2013 Spend” Report), there is an assumption that the % split is still relevant for the total costs derived from the relevant Function Codes (FC) within SAP.</p> <p>SUBTRANSMISSION LINES – Staff have the expertise in identifying and extracting the required data within</p>

Year	Methodology & Assumptions
	<p>SAP for projects that are split between Zone Substations, HV Feeders and Sub-transmission Lines. As the % split for the asset categories is determined via a separate report (“CP PAL 2009 ~ 2013 Spend” Report), there is an assumption that the % split is still relevant for the total costs derived from the relevant Function Codes (FC) within SAP.</p> <p>HV FEEDERS and HV FEEDERS - LAND PURCHASES AND EASEMENTS – Staff have the expertise in identifying and extracting the required data within SAP for projects that are split between HV Feeders and Sub-transmission Lines. As the % split for the asset categories is determined via a separate report (“CP PAL 2009 ~ 2013 Spend” Report), there is an assumption that the % split is still relevant for the total costs derived from the relevant Function Codes (FC) within SAP.</p> <p>DISTRIBUTION SUBSTATIONS and DISTRIBUTION SUBSTATIONS - LAND PURCHASES AND EASEMENTS and LV FEEDERS and LV FEEDERS - LAND PURCHASES AND EASEMENTS – Staff have the expertise in identifying and extracting the required data within SAP for projects that are split between LV Feeders and Distribution Sub-stations. As the % split for the two asset categories is determined via a separate report (“Supply Quality Financials” Report), there is an assumption that the % split is still relevant for the total costs derived from the relevant Function Codes (FC) within SAP. The FY2011 % split was used as the basis for FY2012 and FY2013 split as there was insufficient information available in the “Supply Quality report” for LV Feeders and Distribution Substations for those years.</p> <p>OTHER ASSETS – Not applicable to CitiPower as the data is derived straight from SAP function code 168 and 169</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>For all asset groups, an estimate was used (financial or non-financial data) because SAP is not set up in a way that allows a direct dump of information by the specified asset groups. Even actual financial data used is manually assessed by the staff to determine whether it relates to the correct category.</p> <p>For ‘other’ assets, no estimation is required as the data is derived straight from SAP function code 168 and 169</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per Section D. No other options were considered as there is no other way of deriving estimates other than the approach used by Citipower.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	SUBTRANSMISSION SUBSTATIONS, SWITCHING STATIONS, ZONE SUBSTATIONS – The approach mentioned in section D was selected because there was no direct financial data setup in SAP that allowed us to get a direct data dump of the split between the different categories and this was the best method to estimate as there was no other way to derive the information without judgementally selecting the costs and allocating them across the different cost types.

Year	3. the reason(s) for the selected approach and why it is the best estimate.
	<p>SUBTRANSMISSION LINES – The approach mentioned in section D was selected because there was no direct financial data setup in SAP that allowed us to get a direct data dump of the split between the different categories and this was the best method to estimate as there was no other way to derive the information without judgementally selecting the costs and allocating them across the different cost types.</p> <p>HV FEEDERS and HV FEEDERS - LAND PURCHASES AND EASEMENTS – The approach mentioned in section D was selected because there was no direct financial data setup in SAP that allowed us to get a direct data dump of the split between the different categories and this was the best method to estimate as there was no other way to derive the information without judgementally selecting the costs and allocating them across the different cost types.</p> <p>DISTRIBUTION SUBSTATIONS and DISTRIBUTION SUBSTATIONS - LAND PURCHASES AND EASEMENTS and LV FEEDERS and LV FEEDERS - LAND PURCHASES AND EASEMENTS – The approach mentioned in section D was selected because there was no direct financial data setup in SAP that allowed us to get a direct data dump of the split between the different categories and this was the best method to estimate as there was no other way to derive the information without judgementally selecting the costs and allocating them across the different cost types.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. **No data provided**

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

The categories below had nil values against it from 2009-2013. The reason for this was that no costs have occurred for these categories.

HV FEEDERS - LAND PURCHASES AND EASEMENTS
DISTRIBUTION SUBSTATIONS - LAND PURCHASES AND EASEMENTS
LV FEEDERS - LAND PURCHASES AND EASEMENTS

G. **Data Quality colour coding**

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

2.5 Connections

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Descriptor Metrics	
Connection Subcategory	Descriptor Metric
Residential	Underground Connections (000's)
Residential	Overhead Connections (000's)
Commercial/Industrial	Underground Connections (000's)
Commercial/Industrial	Overhead Connections (000's)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>9. CONNECTIONS</p> <p>9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.</p> <p>9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.</p> <p>9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.</p> <p>9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.</p> <p>9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.</p> <p>9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections. Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 33</p> <p>9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.</p> <p>9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.</p> <p>9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.</p> <p>9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.</p>

Response:	
9.1	Not applicable to CitiPower as per AER advice
9.2	Not applicable to this metric
9.3	Not applicable to this metric
9.4	Not applicable to this metric
9.5	Complies – only data relating to non-contestable, regulated connection services has been used in this measure
9.6	Complies – as no data related to gifted assets, negotiated connection services or connection services have

	been reported under this measure, in line with the requirements of the RIN
9.7	Not applicable to this metric
9.8	Not applicable to this metric
9.9	Not applicable to this metric
9.10	Not applicable to this metric
9.11	Not applicable to this metric

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴¹ data green**; and **ESTIMATED⁴²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The source of this data was CIS/OV (our customer records management system)

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	It is assumed that these fields require only brand new, first time connections. The methodology applied was to obtain a list of service orders from CIS Open-Vision for the defined period that indicate a completed, brand new connection. Each service order is associated with a National Meter Identifier, which has an associated installation type (residential or commercial industrial) and also an indication of whether the site is overhead or underground. After analysis was carried out, this data provided the inputs required. For a small number of sites (<5%), there was no indication of whether the installation was overhead or underground. In order to provide a value, the overhead/underground split of 'known' sites was determined and applied to the 'unknown' sites. For example, if 70% of the known sites were overhead and 30% were underground, the same 70/30 split was applied to the unknown sites.
2010	As above
2011	As above
2012	As above
2013	As above

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

⁴¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As described in section D, estimation is required for sites where the installation type (underground or overhead) is unknown due to no data being recorded in CIS for certain sites.
2010	As above
2011	As above
2012	As above
2013	As above

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As described in section D, the overhead/underground split of 'known' sites was determined and apportioned to the 'unknown' sites.
2010	As above
2011	As above
2012	As above
2013	As above

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	A sample of the 'unknown' sites suggested that the split of overhead/underground installations is in line with the 'known sites'. Therefore, using the split of 'known' sites as the basis for categorising the 'unknown' sites is the most appropriate method for deriving an input.
2010	As above
2011	As above
2012	As above
2013	As above

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Cost Metrics by Connection Classification	
Connection Subcategory	Connection Classification
Residential	DISTRIBUTION SUBSTATION INSTALLED (MVA ADDED)
Embedded generation	DISTRIBUTION SUBSTATION INSTALLED (MVA ADDED)
Subdivision	DISTRIBUTION SUBSTATION INSTALLED (MVA ADDED)
Commercial/Industrial	DISTRIBUTION SUBSTATION INSTALLED (MVA ADDED)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>9. CONNECTIONS</p> <p>9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.</p> <p>9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.</p> <p>9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.</p> <p>9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.</p> <p>9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.</p> <p>9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.</p> <p>9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.</p> <p>9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.</p> <p>9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.</p> <p>9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.</p>

Response:	
9.1	Not applicable to CitiPower as per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control
9.3	Complies – Opex cost s do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been

	included for contestable services.
9.7	Not applicable for this variable
9.8	Complies – Only includes connections as per appendix F
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Complies -
9.11	Not applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴³ data green**; and **ESTIMATED⁴⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Global Information System

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<ul style="list-style-type: none"> The installation of distribution substations and their nameplate capacity are not recorded against the AER customer classification. In GIS CitiPower record all transformers which are installed and in service. To determine the growth/decrease from year to year, a delta change was identified. Some adjustments have been made where the results were not consistent with other years. This was likely as the historical method used to report distribution substations in that year may not be consistent between years. Distribution substations may also be retried and hence the MVA would be seen as a decrease which would distort the new MVA added. The installation of distribution substations in GIS is not recorded as a result of a customer connection or a supply quality or maintenance project. With out this knowledge all installed MVA has been assumed to be as a result of customer connection. The increase or decreases in transformer installations are not classified into the type of customers-residential/commercial/subdivisions/embedded generations. Assumption: CitiPower Asset finalisation sheet divides projects into asset classes with one of the asset classes being substations. The Asset Finalisation includes the CitiPower function codes which have been mapped to the AER customer classification sheet was obtained for different classes and % was

⁴³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	Methodology & Assumptions
	<p>obtained for each category.</p> <ul style="list-style-type: none"> That % of distribution substations for each customer classification was applied to the total MVA added to provide a value for the MVA added for each customer classification No MVA has been included for embedded generations as most use existing installed distribution substations to export energy
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<ul style="list-style-type: none"> Accuracy of data in GIS is questionable Method of recording in GIS doesn't align to the AER customer classification. Substations are recorded for the size with no record as to why they were installed. It was not known if it was a customer project and the AER customer classification Method of recording in GIS does not allow for increase in MVA to be identified as a results of connections
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<ul style="list-style-type: none"> MVA added was estimated from a delta change obtained from GIS MVA added was allocated to connections MVA added was allocated to the AER customer classification using percentages estimated from asset finalisation sheets for completed projects. Further details in section D
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Most accurate way using actual expenditure data for completed project to divide the total MVA added across the AER customer classification.
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Cost Metrics by Connection Classification	
Connection Subcategory	Connection Classification
Residential	DISTRIBUTION SUBSTATIONS INSTALLED (000'S)
Embedded generation	DISTRIBUTION SUBSTATIONS INSTALLED (000'S)
Subdivision	DISTRIBUTION SUBSTATIONS INSTALLED (000'S)
Commercial/Industrial	DISTRIBUTION SUBSTATIONS INSTALLED (000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>9. CONNECTIONS</p> <p>9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.</p> <p>9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.</p> <p>9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.</p> <p>9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.</p> <p>9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.</p> <p>9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.</p> <p>9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.</p> <p>9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.</p> <p>9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.</p> <p>9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.</p>

Response:	
9.1	Not applicable to CitiPower as per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control
9.3	Complies – Opex cost s do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.

9.7	Not applicable for this variable
9.8	Complies – Only includes connections as per appendix F
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable
9.11	Not applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁵ data green**; and **ESTIMATED⁴⁶/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Global Information System
Asset Finalisation data base & SAP

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>GIS was not used as it used as it only provides a physical count of substations that does not contain any information for the purpose that the substation was erected. This prohibits the alignment of substations in GIS against the AER customer classification as well as the determination if the substation was installed because of a customer connection. The substations in GIS are also subject to retirements so the numbers would not be accurate to attribute to new customer connections.</p> <p>The accounting asset finalisation data base was used as this contains an asset class of substation. It was assumed that any expenditure against the substation asset class per project was equivalent to a single substation.</p> <p>The count of substations from the asset finalisation sheets was matched to the CitiPower function codes. The function code to AER customer classification was mapped to determine the percentage of the total number of substations installed for each AER customer classification. Only 2012 & 2013 data was used and averaged as the definition of function codes for CitiPower has changed over the 5 years and the last 2 years is considered more reflective of the current definitions</p>
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

⁴⁵ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Substations are not recorded against the AER customer classification in the GIS asset register. An estimate was required to as actual data i.e. physical count doesn't exist.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Refer to D
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Refer to D
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Descriptor Metrics	
Connection Subcategory	Connection Classification
Residential	DISTRIBUTION SUBSTATION INSTALLED TOTAL SPEND (\$000'S)
Embedded generation	DISTRIBUTION SUBSTATION INSTALLED TOTAL SPEND (\$000'S)
Subdivision	DISTRIBUTION SUBSTATION INSTALLED TOTAL SPEND (\$000'S)
Commercial/Industrial	DISTRIBUTION SUBSTATION INSTALLED TOTAL SPEND (\$000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>9. CONNECTIONS</p> <p>9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.</p> <p>9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.</p> <p>9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.</p> <p>9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.</p> <p>9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.</p> <p>9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.</p> <p>9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.</p> <p>9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.</p> <p>9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.</p> <p>9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.</p>

Response:	
9.1	Not applicable to CitiPower as per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control
9.3	Complies – Expenditure has not been distinguished as Opex costs do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.

9.7	Not applicable for this variable
9.8	Complies – Only includes connections at high voltage 22 kV
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable
9.11	Not applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁷ data green**; and **ESTIMATED⁴⁸/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

SAP Business Intelligence Report

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	GIS contains no financial data so was not utilised as this category required costs incurred Financial information is available from the asset finalisation procedure that splits cost into asset classes. The asset class of substations assets is able to be determined from the asset finalisation data. The expenditure for the asset class was determined for each function code. The function codes were mapped to the AER customer classification. The percentage of the expenditure for substation augmentation asset class was determined against the total expenditure. The percentage was then applied against the total cost as reported in table 2.5.2. to provide the expenditure for substations in the 4 metrics
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

⁴⁷ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Substation augmentation assets are not recorded against the AER customer classification in the Global Information System. GIS does not contain any financial information. Financial costs for projects in standard reports only contains the total costs not individual assets. Substations installed are not recorded against the AER customer classification
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Refer to Response D above.
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	The asset finalisation sheets provide some rationale for the percentage of substation expenditure against the total expenditure. Applying the percentage against the total cost in table 2.5.2 was the most accurate estimate available
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Cost Metrics by Connection Classification	
Connection Subcategory	Connection Classification
Residential	AUGMENTATION HV (NET CIRCUIT KM ADDED) AUGMENTATION LV (NET CIRCUIT KM ADDED)
Embedded generation	AUGMENTATION HV (NET CIRCUIT KM ADDED) AUGMENTATION LV (NET CIRCUIT KM ADDED)
Subdivision	AUGMENTATION HV (NET CIRCUIT KM ADDED) AUGMENTATION LV (NET CIRCUIT KM ADDED)
Comercial/Indust	AUGMENTATION HV (NET CIRCUIT KM ADDED) AUGMENTATION LV (NET CIRCUIT KM ADDED)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

9. CONNECTIONS

- 9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.
- 9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.
- 9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.
- 9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.
- 9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.
- 9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections. Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 33
- 9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.
- 9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.
- 9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.
- 9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.

Response:

9.1	Not applicable to CitiPower as per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control

9.3	Complies – Opex cost s do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.
9.7	Not applicable for this variable
9.8	Complies – Only includes connections as per appendix F
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable
9.11	Not applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁹ data green**; and **ESTIMATED⁵⁰/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Global Information System and SAP Financial asset finalisation sheets

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>There is no record in the Global Information System of the reason for the installation of cables. This means that there is no alignment against the AER customer classification.</p> <p>All conductor installed was assumed to be as a result of customer projects and no other business areas were considered as installing conductor.</p> <p>The Financial asset finalisation data contains financial data against the asset class of conductor and includes the CitiPower function code. This was assumed to be suitable to determine the allocation of conductor against the AER customer classification categories. The expenditure for the asset class that matched HV, LV and Substation were total for each functions code. This this was then mapped to the AER customer classification to determine a % of the expenditure for HV, and LV and substations. This was then applied against the total KM's form GIS</p>

⁴⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	Methodology & Assumptions
	The total KM's of CCT from a delta change were obtained from GIS and these were allocated against the customer classification on the basis of the percentage of cost per function code as reported in the asset class as part of the asset finalisation.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Conductor installed in the Global Information System is not recorded against the AER customer classification. A combination of financial data and physical data has had to be combined to provide an estimate.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Refer to response D
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	The best use of data to provide the most accurate estimate.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex

Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Cost Metrics by Connection Classification	
Connection Subcategory	Connection Classification
Residential	AUGMENTATION HV (TOTAL SPEND \$000'S) AUGMENTATION LV (TOTAL SPEND \$000'S)
Embedded generation	AUGMENTATION HV (TOTAL SPEND \$000'S) AUGMENTATION LV (TOTAL SPEND \$000'S)
Subdivision	AUGMENTATION HV (TOTAL SPEND \$000'S) AUGMENTATION LV (TOTAL SPEND \$000'S)
Comercial/Indust	AUGMENTATION HV (TOTAL SPEND \$000'S) AUGMENTATION LV (TOTAL SPEND \$000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

9. CONNECTIONS

9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.

9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.

9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.

9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.

9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.

9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.

9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.

9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.

9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.

9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.

Response:

9.1	Not applicable to CitiPower as per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control
9.3	Complies – Opex cost s do not apply to connections

9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.
9.7	Not applicable for this variable
9.8	Complies – Only includes connections as per appendix F
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable
9.11	Not applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵¹ data green**; and **ESTIMATED⁵²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

SAP Asset Finalisation Report using Business Intelligence.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	GIS contains no financial data so was not utilised as this category required costs incurred. Financial information is available from the asset finalisation procedure that splits cost into asset classes. The asset class of HV and LV assets is able to be determined from the asset finalisation data. The expenditure for the asset class was determined for each function code. The function codes were mapped to the AER customer classification. The percentage of the expenditure for the HV & LV augmentation asset class was determined against the total expenditure. The percentage was then applied against the total cost as reported in table 2.5.2.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

⁵¹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	An estimate is required as HV & LV augmentation assets are not recorded against the AER customer classification in the Global Information System (GIS). GIS does not contain any financial information. Financial costs for projects in standard reports only contain the total costs not individual assets.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	An estimate is required as HV & LV augmentation assets are not recorded against the AER customer classification in the Global Information System (GIS). GIS does not contain any financial information.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	This method was selected as it was considered the most feasible option to produce a result as required in the Notice.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Descriptor Metrics	
Connection Subcategory	Descriptor Metric
Residential	Mean days to connect residential customer with LV single phase connection (no.)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>9. CONNECTIONS</p> <p>9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.</p> <p>9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.</p> <p>9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.</p> <p>9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.</p> <p>9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.</p> <p>9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections. Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 33</p> <p>9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.</p> <p>9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.</p> <p>9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.</p> <p>9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.</p>

Response:	
9.1	Not applicable to CitiPower as per AER advice
9.2	Not applicable to this metric
9.3	Not applicable to this metric
9.4	Not applicable to this metric
9.5	Complies – only data relating to non-contestable, regulated connection services has been used for this measure
9.6	Complies – as no data related to gifted assets, negotiated connection services or connection services have been reported under this measure, in line with the requirements of the RIN
9.7	Not applicable to this metric
9.8	Not applicable to this metric
9.9	Not applicable to this metric

9.10	Not applicable to this metric
9.11	Not applicable to this metric

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵³ data green**; and **ESTIMATED⁵⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

To provide this input, data is taken from the Market Transaction System and analysed to provide a figure

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	It is assumed that this includes the time from which a) the connection is ready for energisation and b) all paperwork required for an energisation is received by CitiPower and the time the energisation actually occurs
2010	As above
2011	As above
2012	As above
2013	As above

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	An estimate is required because CitiPower does not differentiate between the cycle time for residential and commercial /industrial customers.
2010	As above
2011	As above
2012	As above
2013	As above

⁵³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The basis for the estimate is to utilise the mean cycle time for all customer connections (whether they are commercial or residential). The alternative option is to make further assumptions about differences between the cycle time for commercial/residential connection types. For example, we could make an assumption that residential cycle times are shorter than commercial cycle times.
2010	As above
2011	As above
2012	As above
2013	As above

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The cycle times of all connection types was used as the basis for estimate because it reduces the need to make further assumptions that may not be valid
2010	As above
2011	As above
2012	As above
2013	As above

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Descriptor Metrics	
Connection Subcategory	Descriptor Metric
Residential	VOLUME OF GSL BREACHES FOR RESIDENTIAL CUSTOMERS (0'S)
Residential	GSL PAYMENTS (\$000's)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

9. CONNECTIONS

9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.

9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.

9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.

9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.

9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.

9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections. Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 33

9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.

9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.

9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.

9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.

Response:

9.1	Not applicable to CitiPower as per AER advice
9.2	Not applicable to this metric
9.3	Not applicable to this metric
9.4	Not applicable to this metric
9.5	Complies – only data relating to non-contestable, regulated connection services has been used in this measure
9.6	Complies – as no data related to gifted assets, negotiated connection services or connection services have been reported under this measure, in line with the requirements of the RIN
9.7	Not applicable to this metric

9.8	Not applicable to this metric
9.9	Not applicable to this metric
9.10	Not applicable to this metric
9.11	Complies – a GSL scheme does exist for these connections services

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁵ data green**; and **ESTIMATED⁵⁶/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

This data is sourced from SAP. The specific transaction is FBL 1N, which provides a list of cheques produced.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Data relating to GSL payments and breaches are available from SAP (transaction FBL 1N). This transaction captures all cheques raised for customers. The data is then filtered so that it only captures cheques relating to connections. There are no assumptions associated with the calculation of these figures.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	This metric requires brand new, residential connections only. Actual data is not available because CitiPower calculates GSL breaches and payments for all energisations and does not differentiate between a) residential and commercial and b) brand new connections and existing connections.
2010	As per 2009
2011	As per 2009

⁵⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	For this reason, breach and payment volumes have been apportioned according to a) the portion of brand new residential connections into the total number of brand new connections and b) the portion of brand new connection into the total number of connections.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	This option was chosen as it is the only viable option for estimation
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Descriptor Metrics	
Connection Subcategory	Descriptor Metric
Residential	Volume of customer complaints relating to connection services (no.)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>9. CONNECTIONS</p> <p>9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.</p> <p>9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.</p> <p>9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.</p> <p>9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.</p> <p>9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.</p> <p>9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.</p> <p>9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.</p> <p>9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.</p> <p>9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.</p> <p>9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.</p>

Response:	
9.1	Not applicable to CitiPower as per AER advice
9.2	Not applicable to this metric
9.3	Not applicable to this metric
9.4	Not applicable to this metric
9.5	Complies – only data relating to non-contestable, regulated connection services has been used in this measure
9.6	Complies – as no data related to gifted assets, negotiated connection services or connection services have been reported under this measure, in line with the requirements of the RIN
9.7	Not applicable to this metric
9.8	Not applicable to this metric
9.9	Not applicable to this metric

9.10	Not applicable to this metric
9.11	Not applicable to this metric

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁷ data green**; and **ESTIMATED⁵⁸/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Customer complaints are tracked through CARE in SAP.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Obtain a list of all complaints relating to customer connections and compare it to a list of all customer connections for the corresponding period. Any National Meter Identifiers that occurred on both lists were counted.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

⁵⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	This option was chosen as it is the only viable option for estimation
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Descriptor Metrics	
Connection Subcategory	Connection Classification
Subdivision	Underground Connections
Subdivision	Overhead Connections

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>9. CONNECTIONS</p> <p>9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.</p> <p>9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.</p> <p>9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.</p> <p>9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.</p> <p>9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.</p> <p>9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.</p> <p>Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 33</p> <p>9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.</p> <p>9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.</p> <p>9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.</p> <p>9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.</p>
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Response:	
9.1	Not applicable to CitiPower as per AER advice
9.2	Not applicable to this metric
9.3	Not applicable to this metric
9.4	Not applicable to this metric
9.5	Complies – only data relating to non-contestable, regulated connection services has been used in this measure

9.6	Complies – as no data related to gifted assets, negotiated connection services or connection sercuces have been reported under this measure, in line with the requirements of the RIN
9.7	Not applicable to this metric
9.8	Not applicable to this metric
9.9	Not applicable to this metric
9.10	Not applicable to this metric
9.11	Not applicable to this metric

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁹ data green**; and **ESTIMATED⁶⁰/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Not Applicable

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable

⁵⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

This data cannot be provided as our current business process is to capture these connections as either commercial/industrial or residential.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Descriptor Metrics	
Connection Subcategory	Connection Classification
Subdivision	Cost per Lot (\$)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

9. CONNECTIONS

- 9.1 CitiPower must ensure that the data provided for *connection services* reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 9.2 CitiPower is not required to distinguish expenditure for *connection services* between standard or alternative control services in *regulatory template 2.5*.
- 9.3 CitiPower is not required to distinguish expenditure for *connection services* as either *capex* or *opex* in *regulatory template 2.5*.
- 9.4 CitiPower must report expenditure data as a gross amount, by not subtracting *customer contributions* from expenditure data.
- 9.5 CitiPower must report data for non-contestable, regulated *connection services*. This includes work performed by third parties on behalf of CitiPower.
- 9.6 CitiPower must not report data in relation to gifted assets, negotiated *connection services* or *connection services* which have been classified as contestable by the AER.
- 9.7 For augmentation metrics, 'km added' refers to the net addition of *circuit line length* resulting from the augmentation work of *complex connections*.
- 9.8 The definitions of *complex connections* in appendix F provide guidance on the types of augmentation works which must be reported as *connection services*, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.
- 9.9 CitiPower must only report augmentation for *connections* in *regulatory template 2.5* relating to *customer connection* requests, as per the definition of *connection expenditure* in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in *regulatory templates 2.3* and *2.5*.
- 9.10 CitiPower must report the *MVA added* for *distribution substations* installed for *connection services*. Where *MVA added* must be calculated by CitiPower as the sum of the *nameplate rating* of all the *distribution substations* installed for the relevant year.
- 9.11 CitiPower is not required to report data in respect of *GSLs*, where a *GSL* scheme does not exist for the *connection service*.

Response:

9.1	Not Applicable to CitiPower as per AER advice
9.2	Complies
9.3	Complies – Opex cost s do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.
9.7	Not Applicable for this variable
9.8	Complies – Only includes connections as per appendix F
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice

9.10	Not Applicable for this variable
9.11	Not Applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶¹ data green**; and **ESTIMATED⁶²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report will need to be provided.

Response:

Source SAP Business Intelligence report for Customer Projects

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not applicable no Urban Residential Subdivisions in CitiPower High rise apartments and dual & multiple developments are excluded
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable. No projects were completed in this metric in CitiPower
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

⁶¹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable. No projects were completed in this metric in CitiPower
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not applicable. No projects were completed in this metric in CitiPower
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable no Urban Residential Subdivision in CitiPower

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009 2010 2011 2012 2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Descriptor Metrics	
Connection Subcategory	Descriptor Metric
Embedded Generation	Underground Connections (\$000s)
Embedded Generation	Overhead Connections (\$000s)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>9. CONNECTIONS</p> <p>9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.</p> <p>9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.</p> <p>9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.</p> <p>9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.</p> <p>9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.</p> <p>9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.</p> <p>9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.</p> <p>9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.</p> <p>9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.</p> <p>9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.</p>

Response:	
9.1	Not applicable to CitiPower as per AER advice
9.2	Not applicable to this metric
9.3	Not applicable to this metric
9.4	Not applicable to this metric
9.5	Complies – only data relating to non-contestable, regulated connection services has been used in this measure
9.6	Complies – as no data related to gifted assets, negotiated connection services or connection services have been reported under this measure, in line with the requirements of the RIN
9.7	Not applicable to this metric

9.8	Not applicable to this metric
9.9	Not applicable to this metric
9.10	Not applicable to this metric
9.11	Not applicable to this metric

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶³ data green**; and **ESTIMATED⁶⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:
Not Applicable

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	CitiPower has assessed the requirements for this category and believe it is reasonable to specify there is no data. However, should an estimate be required, it is immaterial in volume. The volume of brand new connections that include embedded generation is immaterial in volume, and CitiPower has estimated that this category makes up only 1% of the total. Hence it is reasonable to assume the data as NIL.
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	An estimate is required as the volume of brand new connections that include embedded generation is immaterial in volume, and CitiPower has estimated that this category makes up only 1% of the total. Hence it is reasonable to assume the data as NIL.

⁶³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

After consultation with a subject matter expert from the business, it is estimated that the volume of brand new connections that include embedded generation is nil.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009 2010 2011 2012 2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.2 - Cost metrics by connection classification	
Connection Subcategory	Connection Classification
RESIDENTIAL	SIMPLE CONNECTION LV (\$000'S)
COMMERCIAL/INDUSTRIAL	SIMPLE CONNECTION LV (\$000'S)
RESIDENTIAL	SIMPLE CONNECTION LV (000'S)
COMMERCIAL/INDUSTRIAL	SIMPLE CONNECTION LV (000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

9. CONNECTIONS

9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.

9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.

9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.

9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.

9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.

9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.

9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.

9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.

9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.

9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.

Definitions

Residential customer connection

A residential customer connection relates to connecting customers who purchase energy principally for personal, household or domestic use at premises.

Customer complaint

A written or verbal expression of dissatisfaction about an action, or failure to act, or in respect of a product or service offered or provided by an electricity network distributor.

Underground connection

A physical link between the distribution system and a customer's premises running underground from a pole or service pit to the customer's premises.

Overhead connection

A physical aerial link between the distribution system and a customer's premises from a pole to the customer's premises.

Commercial/Industrial customer connection

A commercial and industrial customer connection relates to connecting any customer who is not a residential or unmetered customer.

Please provide a Response in this box:

Expenditure

In complying with the AER requirements additional expenditure from Function Codes 114 and 115 were required to be added to the Templates. The relevant Function Code 114 and 115 expenditure relates to line of mains non-contestable regulated connection services.

Response:

9.1	Not applicable to CitiPower as per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control
9.3	Complies – Opex costs do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.
9.7	Not applicable for this variable
9.8	Complies – Only includes connections that align to the appendix F
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable
9.11	Not applicable for this variable

Volumes

9.1	Not applicable to CitiPower as per AER advice
9.2	Not applicable to this metric
9.3	Not applicable to this metric
9.4	Not applicable to this metric
9.5	Complies – only data relating to non-contestable, regulated connection services has been used in this measure
9.6	Complies – as no data related to gifted assets, negotiated connection services or connection services have been reported under this measure, in line with the requirements of the RIN
9.7	Not applicable to this metric
9.8	Not applicable to this metric
9.9	Not applicable to this metric
9.10	Not applicable to this metric
9.11	Not applicable to this metric

B. Actual vs. Estimated Data colour coding

For each year, please shade ACTUAL⁶⁵ data green; and ESTIMATED⁶⁶/derived data red

⁶⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

Expenditure

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Expenditure: Financial data obtained from a report from SAP.

Volumes:

The source of this data was CIS/OV (CitiPower's customer records management system).

'Residential Simple Connection LV' is the summation of the same data provided for Residential Underground and Overhead connection components of table 2.5.1.

'Commercial/Industrial Simple Connection LV' is the summation of the same data provided for Commercial/Industrial Underground and Overhead connection components of table 2.5.1. However, the summation for this category also contains source information from Source data from Regulatory RIN for 2009 to 2013 and SAP Business Intelligence report for Customer Project Management System.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Expenditure The costs were obtained directly from the SAP Function Code Expenditure for that year.</p> <p>In Table 2.5.2, the Residential ratio of F/C 114 and 115 costs was entered into the Residential Simple Connection LV costs. The Commercial ratio of F/C 114 and 115 costs was added to the total for the Commercial/Industrial Simple Connection LV costs.</p> <p>Volumes 'Residential Simple Connection LV' is the summation of the same data provided for Residential Underground and Overhead connection components of table 2.5.1.</p> <p>'Commercial/Industrial Simple Connection LV' is the summation of the same data provided for Commercial/Industrial Underground and Overhead connection components of table 2.5.1. The methodology for this is noted below.</p> <p>Method from table 2.5.1: It is assumed that these fields require only brand new, first time connections. The methodology applied was to obtain a list of service orders from CIS Open-Vision for the defined period that indicate a completed, brand new connection. Each service order is associated with a National Meter Identifier, which has an associated installation type (residential or commercial industrial) and also an indication of whether the site is overhead or underground. After analysis was carried out, this data provided the inputs required. For a small number of sites (<5%), there was no indication of whether the installation was overhead or underground. In order to provide a value, the overhead/underground split of 'known' sites was determined and applied to the 'unknown' sites. For example, if 70% of the known sites were overhead</p>

⁶⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	Methodology & Assumptions
	<p>and 30% were underground, the same 70/30 split was applied to the unknown sites.</p> <p>In addition to the volumes above, re the 'Commercial/Industrial Simple Conneciton LV' component, it was important to add the volumes derived from the Customer Development team (separate to the volumes derved above). The methodology to obtain this information was as follows:</p> <ol style="list-style-type: none"> 1. CitiPower function codes do no align with the AER connection classifications. Function codes relate to capacity being made available in kVA not the type of connection being made. A matrix was used to spread the function code across the connection classifications. 2. The Regulatory RIN report was used for the direct expenditure for the years 2009 to 2013. This report excludes gifted assets. 3. The SAP CPM Business Intelligence report provided average direct costs of completed projects within a function code. Note this does not include capture of all projects so is a sample only. Percentage capture was in the range of 65% of the total reported regulation RIN \$ so was considered to be a fair indication of the average cost per project. 4. The average unit cost from the SAP CPM Business Intelligence report has been used to calculate the number of physicals required to match the regulation RIN expenditure.
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>Expenditure An estimate is required as the costs are not directly available.</p> <p>Volumes As described in section D, estimation is required for sites where the installation type (underground or overhead) is unknown due to no data being recorded in CIS for certain sites. In addition, re the information provided from the Customer Development team; CitiPower have not historically recorded customer projects in the format as requested in the AER connection classification as per the category analysis RIN. Actual data has been used to determine averages per function code. However, an estimate of how this maps to the connection classification has had to be adopted.</p> <p>Only a sample of projects were captured so an estimate had to be applied to determine 100% of the regulation RIN</p>
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Expenditure Estimate of apportioning costs was on the basis of numbers of simple connection jobs in the Residential and Commercial/Industrial categories.</p> <p>Volumes As described in section D, the overhead/underground split of 'known' sites was determined and apportioned to the 'unknown' sites.</p>
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	<p>Expenditure There appears to be no other logical approach.</p> <p>Volumes A sample of the 'unknown' sites suggested that the split of overhead/underground installations is in line with the 'known sites'. Therefore, using the split of 'known' sites as the basis for categorising the 'unknown' sites is the most appropriate method for deriving an input. In addition, re the additional information provided from the Customer Development team; actual data was utilised to obtain unit rates per function code to produce the most accurate estimate.</p>
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

For the Cost data:

2009	2010	2011	2012	2013
------	------	------	------	------

For the Volume data:

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.2 Cost Metrics by Connection Classification	
Connection Subcategory	Connection Classification
Residential	COMPLEX CONNECTION LV (\$000'S) COMPLEX CONNECTION LV (000'S)
Residential	COMPLEX CONNECTION HV (\$000'S) COMPLEX CONNECTION HV (000'S)
Commercial/industrial	COMPLEX CONNECTION HV (CUSTOMER CONNECTED AT HV) (\$000'S) COMPLEX CONNECTION HV (CUSTOMER CONNECTED AT HV) (000'S)
Commercial/industrial	COMPLEX CONNECTION HV (CUSTOMER CONNECTED AT LV, UPSTREAM ASSET WORKS) (\$000'S) COMPLEX CONNECTION HV (CUSTOMER CONNECTED AT LV, UPSTREAM ASSET WORKS) (000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

9. CONNECTIONS

CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.

9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.

9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.

9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.

9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.

9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.

9.8 *The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.*

9.9 *CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.*

9.10 *CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.*

9.11 *CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.*

Response:

9.1	Not applicable to CitiPower as per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control
9.3	Complies – Opex cost s do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.
9.7	Not applicable for this variable
9.8	Complies – Only includes connections that align to the appendix F
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable
9.11	Not applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶⁷ data green**; and **ESTIMATED⁶⁸/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report will need to be provided.

Response:

Source data from Regulatory RIN for 2009 to 2013 and SAP Business Intelligence report for Customer Project Management System

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<ol style="list-style-type: none"> 1. CitiPower function codes do not align with the AER connection classifications. Function codes relate to capacity being made available in kVA not the type of connection being made. A matrix was used to spread the function code across the connection classifications. 2. The Regulatory RIN report was used for the direct expenditure for the years 2009 to 2013. This report excludes gifted assets. 3. The SAP CPM Business Intelligence report provided average direct costs of completed projects within a function code. Note this does not include capture of all projects so is a sample only. Percentage capture was in the range of 65% of the total reported regulation RIN \$ so was considered to be a fair indication of the average cost per project. 4. The average unit cost from the SAP CPM Business Intelligence report has been used to calculate

⁶⁷ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	Methodology & Assumptions
	the number of physicals required to match the regulation RIN expenditure. 5. Projects may incur cost over a number of years so the LTD costs will not necessary match the regulation RIN YTD expenditure per the CitiPower function code.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	1. CitiPower have not historically recorded customer projects in the format as requested in the AER connection classification as per the category analysis. Actual data has been used to determine averages per function code but an estimate of how this maps to the connection classification has had to be adopted. 2. Only a sample of projects were captured so an estimate had to be applied to determine 100% of the regulation RIN
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As above
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Uses actual data for unit rates per function code so produces the most accurate estimate.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable unless no projects existed in that connection classification.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None

Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.2 Cost Metrics by Connection Classification	
Connection Subcategory	Connection Classification
Commercial/Industrial	COMPLEX CONNECTION HV (CUSTOMER CONNECTED AT LV, MINOR HV WORKS) (\$000'S) COMPLEX CONNECTION HV (CUSTOMER CONNECTED AT LV, MINOR HV WORKS) (000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

CONNECTIONS

- 9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.
- 9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.
- 9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.
- 9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.
- 9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.
- 9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.
- 9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.
- 9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.
- 9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.
- 9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.

Please provide a Response in this box:

9.1	Not applicable. Does not apply as per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control
9.3	Complies – Opex cost s do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.

9.7	Not applicable for this variable
9.8	Complies – Only includes connections as per appendix F
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable
9.11	Not applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶⁹ data green**; and **ESTIMATED⁷⁰/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

SAP CPM Business Intelligence Reports

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	CitiPower do not record project that do or do not require upstream augmentation and cannot separate the commercial industrial connection into this classification. There is no basis to split the projects that would reflect the different expenditure that may occur due to additional works for upstream augmentation. All Commercial Industrial complex connections at LV have been recorded against projects with upstream works as there is no logical basis to split them. Nothing is reported in the classification for both the volume and expenditure metric.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
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⁶⁹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. **No data provided**

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

CitiPower do not record project that do or do not require upstream augmentation and cannot separate the commercial industrial connection into this classification. There is no basis to split the projects that would reflect the different expenditure that may occur due to additional works for upstream augmentation.

All Commercial Industrial complex connections at LV have been recorded against projects with upstream works as there is no logical basis to split them.

Nothing is reported in the classification for both the volume and expenditure metric.

G. **Data Quality colour coding**

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.2 Cost Metrics by Connection Classification	
Connection Subcategory	Connection Classification
Commercial/Industrial	COMPLEX CONNECTION SUB-TRANSMISSION (\$000'S) COMPLEX CONNECTION SUB-TRANSMISSION (000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

CONNECTIONS

- 9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.
- 9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.
- 9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.
- 9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.
- 9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.
- 9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.
- 9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.
- 9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.
- 9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.
- 9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.

Response:

9.1	Not applicable as per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control
9.3	Complies – Opex cost s do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.
9.7	Not applicable for this variable
9.8	Complies – Only includes connections as per appendix F Sub Transmission 66 kV
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable

9.11	Not applicable for this variable
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B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷¹ data green**; and **ESTIMATED⁷²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report will need to be provided.

Response:

SAP – Networks for HV connections and SAP CPM Business Intelligence reports

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	No CitiPower projects were completed in this connection classification. There were no customers connected at Sub Transmission 66 kV to the CitiPower Network No costs or physicals will be reported
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

⁷¹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No CitiPower projects were completed in this connection classification

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009 2010 2011 2012 2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.2 Cost Metrics by Connection Classification	
Connection Subcategory	Connection Classification
Embedded generation	Simple connection lv (\$000's)
Subdivision	Complex connection lv (\$000's)
Embedded generation	Simple connection lv (000's)
Subdivision	Complex connection lv (000's)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

9. CONNECTIONS

9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.

9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.

9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.

9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.

9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.

9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.

9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.

9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.

9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.

9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.

Response:

9.1	Not applicable to CitiPower as per AER advice
9.2	Complies
9.3	Complies – Opex costs do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.

9.7	Not applicable for this variable
9.8	Complies – Only includes connections as per Appendix F
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable
9.11	Not applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷³ data green**; and **ESTIMATED⁷⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report will need to be provided.

Response:

Source data from Regulatory RIN for 2009 to 2013 and SAP Business Intelligence report for Customer Project Management System

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Subdivision</p> <ul style="list-style-type: none"> The AER definition for the subdivision – simple connection lv (\$000's) is for Small subdivisions requiring extension or augmentation of overhead or underground LV feeders including road crossings These small type of subdivision are not recorded in financial reporting and cannot be separated into the AER customer classification. The cost for this work is recorded in CitiPower financial reporting and management of the connection as a residential connection and has been included in the AER customer classification under Residential – Complex Connection lv <p>Embedded Generation</p> <ul style="list-style-type: none"> The AER definition for embedded generation – simple connection lv (\$000's) is for Single/multi-phase customer connection service, and /or: one span of overhead service wire or standard underground service wire and/or road crossing; and meter upgrade. The AER definitions provides the example of residential customer photo voltaic with meter upgrade. These small types of embedded connections are not recorded in financial reporting and cannot be separated into the AER customer classification. The cost for this work is recorded in CitiPower

⁷³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	Methodology & Assumptions
	financial reporting and management of the connection as a residential connection and has been included in the AER customer classification under Residential – Complex Connection Iv No data is to be provided in either the volume or expenditure metric.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable. No data is to be reported in this customer classification
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not applicable
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Expenditure and volumes for these customer classifications has been included in the AER customer classification under Residential – Complex Connection. CitiPower are unable to separate the connection type from other connections.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009 2010 2011 2012 2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex

Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.1 Descriptor Metrics	
Connection Subcategory	Connection Classification
Subdivision	COMPLEX CONNECTION HV (NO UPSTREAM ASSET WORKS) (\$000'S) COMPLEX CONNECTION HV (WITH UPSTREAM ASSET WORKS) (\$000'S) COMPLEX CONNECTION HV (NO UPSTREAM ASSET WORKS) (000'S) COMPLEX CONNECTION HV (WITH UPSTREAM ASSET WORKS) (000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

9. CONNECTIONS

9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.

9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.

9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.

9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.

9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.

9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.

Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 33

9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.

9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.

9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.

9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.

Response:	
9.1	Not applicable to CitiPower per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control
9.3	Complies – Opex costs do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been

	included for contestable services.
9.7	Not applicable for this variable
9.8	Complies – Only includes connections at high voltage 22 kV
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable
9.11	Not applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁵ data green**; and **ESTIMATED⁷⁶/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report will need to be provided.

Response:

Source SAP Business Intelligence report for Customer Projects

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	This was assumed to be Residential Urban Subdivisions. High Rise developments and Dural & Multiple projects were assumed to be excluded. There were no Residential Urban Subdivisions in CitiPower
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable. There were no Residential Urban Subdivisions in CitiPower

⁷⁵ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.
'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable. There were no Residential Urban Subdivisions in CitiPower
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not applicable. There were no Residential Urban Subdivisions in CitiPower
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.2 Cost Metrics by Connection Classification	
Connection Subcategory	Connection Classification
Embedded Generation	COMPLEX CONNECTION HV (SMALL CAPACITY) (\$000'S) COMPLEX CONNECTION HV (SMALL CAPACITY) (000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN

Copy and paste the Requirements of the Notice in this box:

CONNECTIONS

- 9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.
- 9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.
- 9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.
- 9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.
- 9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.
- 9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.
Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 33
- 9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.
- 9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.
- 9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.
- 9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.

Response:

9.1	Not applicable to CitiPower as per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control
9.3	Complies – Opex cost s do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.
9.7	Not applicable for this variable

9.8	Complies – Only includes connections as per appendix F
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable
9.11	Not applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁷ data green**; and **ESTIMATED⁷⁸/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report will need to be provided.

Response:

SAP – Networks for High Voltage connections and CPM Business Intelligence reports

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	No projects were completed in 2009
2010	<ul style="list-style-type: none"> • CitiPower records Embedded Generation connections as a single group. • Projects are built over a number of years and the costs vary. Where available, individual Life To Date cost per projects constructed over a number of years have been used otherwise average value of these connection types has been used and the cost populated in the year to align with the regulation RIN expenditure for that year by the number of physicals. • The physicals were determined by the expenditure divided by the average value. Note: not all projects are captured so physicals has to be estimated • The Regulatory RIN report was used for the direct expenditure for the years 2009 to 2013. This report excludes gifted assets • An assumption has been made to take an average of the completed projects for that year to determine unit rate. Note: not all projects are captured so physicals have to be estimated • For the larger projects the costs were allocated to the year where the majority of costs were incurred. • After the mapping assumptions were applied, the estimated total of the reported expenditure for all the AER customer classifications was in the range of + or – 5% of the RIN expenditure. To match the RIN expenditure a further estimate was applied to adjust the volumes of the higher volume customer classification categories to remove the variance to the RIN. The unit costs were not altered in this

⁷⁷ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	Methodology & Assumptions
	step.
2011	Refer to 2010
2012	Refer to 2010
2013	Refer to 2010

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable no projects were completed in 2009
2010	Not applicable. Actual data used but have not been able to be aligned with the regulation RIN expenditure as these projects incurred costs over a number of years and there is no basis to allocate the LTD (life to date) costs in any particular year Note: not all projects are captured so physicals has to be estimated Very small number of projects
2011	Refer to 2010
2012	Refer to 2010
2013	Refer to 2010

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable. No projects were completed in 2009
2010	Averages have been used for actual completed projects per year. Keeping the average unit dollar rate the number of physicals was then determined to match the expenditure with the reported RIN
2011	Refer to 2010
2012	Refer to 2010
2013	Refer to 2010

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not applicable. No projects were completed in 2009
2010	Long lead time and project completed over multiple years
2011	Refer to 2010
2012	Refer to 2010
2013	Refer to 2010

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.5 Connections	
Table name: 2.5.2 Cost Metrics by Connection Classification	
Connection Subcategory	Connection Classification
Embedded Generation	COMPLEX CONNECTION HV (LARGE CAPACITY) (\$000'S) COMPLEX CONNECTION HV (LARGE CAPACITY) (000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

CONNECTIONS

- 9.1 CitiPower must ensure that the data provided for connection services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 9.2 CitiPower is not required to distinguish expenditure for connection services between standard or alternative control services in regulatory template 2.5.
- 9.3 CitiPower is not required to distinguish expenditure for connection services as either capex or opex in regulatory template 2.5.
- 9.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.
- 9.5 CitiPower must report data for non-contestable, regulated connection services. This includes work performed by third parties on behalf of CitiPower.
- 9.6 CitiPower must not report data in relation to gifted assets, negotiated connection services or connection services which have been classified as contestable by the AER.
- 9.7 For augmentation metrics, 'km added' refers to the net addition of circuit line length resulting from the augmentation work of complex connections.
- 9.8 The definitions of complex connections in appendix F provide guidance on the types of augmentation works which must be reported as connection services, as descriptor metrics for table 2.5.1 and as cost metrics for table 2.5.2.
- 9.9 CitiPower must only report augmentation for connections in regulatory template 2.5 relating to customer connection requests, as per the definition of connection expenditure in appendix F. CitiPower must not double count augmentation requirements by twice reporting augmentation data in regulatory templates 2.3 and 2.5.
- 9.10 CitiPower must report the MVA added for distribution substations installed for connection services. Where MVA added must be calculated by CitiPower as the sum of the nameplate rating of all the distribution substations installed for the relevant year.
- 9.11 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for the connection service.

Response:	
9.1	Not applicable to CitiPower per AER advice
9.2	Complies CitiPower has not distinguished expenditure between standard and alternative control
9.3	Complies – Opex cost s do not apply to connections
9.4	Complies - Gross amounts used
9.5	Complies – Includes all regulated connection services
9.6	Complies – Only the non contestable component i.e. tie in and shared augmentation work has been included for contestable services.

9.7	Not applicable for this variable
9.8	Complies – Only includes connections as per appendix F Embedded Generation at HV connection
9.9	Complies – Only the work for the connection has been included. No augmentation is reported twice
9.10	Not applicable for this variable
9.11	Not applicable for this variable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁹ data green**; and **ESTIMATED⁸⁰/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report will need to be provided.

Response:

SAP – Networks for High Voltage connections and CPM Business Intelligence reports

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	No CitiPower projects were completed in this connection classification. There were no embedded generation connected at HV to the CitiPower Network No costs or physicals will be reported
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable

⁷⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No CitiPower projects were completed in the connection classification

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009 2010 2011 2012 2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a



AER Category Analysis RIN

CitiPower Pty

Basis of Preparation documents

Part B

2 June 2014

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2.6 Non-Network

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.1 Non Network Expenditure	
Service Subcategory	Asset Category
IT and Communications	Client Device Expenditure (OPEX)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

10.1 If expenditure is directly attributable to an expenditure category in this regulatory template 2.6 it is a Direct Cost for the purposes of this regulatory template. Report all capex and/or opex Direct Costs as required, irrespective of whether any Direct Costs are also classified as Corporate Overheads, Network Overheads or other capex or opex categories. To the extent this results in multiple reporting of expenditures, identify this in accordance with instructions at paragraph 2.3 above.

Non-network IT & Communications Expenditure Client Devices Expenditure

Client Devices Expenditure is expenditure related to a hardware device that accesses services made available by a server. Client Devices Expenditure includes hardware involved in providing desktop computers, laptops, tablets and thin client interfaces and handheld end user computing devices including smart phones, tablets and laptops.

Please provide a Response in this box:

The information provided complies with section 10.1 of Appendix E, and aligns with the definitions provided in Appendix F. All direct costs for the purposes Client Device Expenditure (OPEX) have been reported, irrespective of whether they are also classified as Corporate Overheads, Network Overheads or other CAPEX or OPEX categories

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹ data green**; and **ESTIMATED²/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

All data has been extracted from SAP Profit Centre report and Business Intelligence profit centre reports.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>For OPEX costs we do not separate our device costs from other services associated with that device type. We have calculated the OPEX Expenditure for Client Devices using the following account and Function Code (Under the assumption that all relevant costs have been captured by these accounts)</p> <ul style="list-style-type: none">534000 (Telco Router Maintenance)534010 (Telco – WAN Intercon C)534020 (Managed WAN Charge)534080 (Telco Internet)534090 (Telco – Int Telephone)534100 (Telco – Telephone MA)534110 (Telco – Telephony)534120 (Telco – Mobile)534125 (Telco Hardware). <p>The total costs have been allocated between CitiPower and Powercor. The percentage of total costs allocated to CitiPower is based on CitiPower’s Business As Usual (BAU) costs as a percentage of the total BAU costs, under the assumption that the proportion of BAU costs incurred are reflective of how Telco costs are incurred.</p>
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	An estimate was required because Telco costs which were excluded from total BAU costs were not captured at a CitiPower/Powercor level
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Telco costs were allocated to CitiPower / Powercor based on the percentage of CitiPower / Powercor’s Business As Usual (BAU) costs to total BAU costs (as per split of Management Fee allocations from CHED Services IT to PAL / CP , under the assumption that the split in BAU costs are reflective of the split in Telco costs”
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009

2013	Refer to 2009
------	---------------

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The approach selected is assumed to be most reflective of how costs are incurred
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.1 Non Network Expenditure	
Service Subcategory	Asset Category
IT and Communications	Client Device Expenditure (CAPEX)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

10.1 If expenditure is directly attributable to an expenditure category in this *regulatory template* 2.6 it is a *Direct Cost* for the purposes of this *regulatory template*. Report all capex and/or opex *Direct Costs* as required, irrespective of whether any *Direct Costs* are also classified as *Corporate Overheads*, *Network Overheads* or other *capex* or *opex* categories. To the extent this results in multiple reporting of expenditures, identify this in accordance with instructions at paragraph 2.3 above.

Non-network IT & Communications Expenditure Client Devices Expenditure

Client Devices Expenditure is expenditure related to a hardware device that accesses services made available by a server. Client Devices Expenditure includes hardware involved in providing desktop computers, laptops, tablets and thin client interfaces and handheld end user computing devices including smart phones, tablets and laptops.

Please provide a Response in this box:

The information provided complies with section 10.1 of Appendix E, and aligns with the definitions provided in Appendix F given that all direct costs for the purposes Client Device Expenditure (CAPEX) have been reported, irrespective of whether they are also classified as Corporate Overheads, Network Overheads or other CAPEX or OPEX categories

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³ data green**; and **ESTIMATED⁴/derived data red**

2009	2010	2011	2012	2013
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³ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁴ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

All data from Business Intelligence (Capital expenditure function code) reports interfaced with SAP.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	For CAPEX we have used BI Capital report for functions codes 200 (IT Equipment and Computers. Under the assumption that all relevant costs have been captured by these accounts.
2010	See 2009
2011	See 2009
2012	See 2009
2013	For CAPEX we have used BI Capital report for functions codes 200 (IT Equipment and Computers) & 270 (Telecommunications)

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.1 Non Network Expenditure	
Service Subcategory	Asset Category
IT and Communications	RECURRENT EXPENDITURE (OPEX) NON-RECURRENT EXPENDITURE (OPEX)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

10.1 If expenditure is directly attributable to an expenditure category in this regulatory template 2.6 it is a Direct Cost for the purposes of this regulatory template. Report all capex and/or opex Direct Costs as required, irrespective of whether any Direct Costs are also classified as Corporate Overheads, Network Overheads or other capex or opex categories. To the extent this results in multiple reporting of expenditures, identify this in accordance with instructions at paragraph 2.3 above.

Non-network IT & Communications Expenditure - Recurrent Expenditure Is all IT & Communications Expenditure that is Recurrent Expenditure excluding any expenditure reported as IT & Communications Expenditure - Client Devices Expenditure.

Please provide a Response in this box:

The information provided complies with section 10.1 of Appendix E, and aligns with the definitions provided in Appendix F.

The information provided complies with section 10.1 of Appendix E given that all direct costs relating to Recurrent Expenditure (OPEX) have been reported, irrespective of whether they are also classified as Corporate Overheads, Network Overheads or other CAPEX or OPEX categories

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵ data green**; and **ESTIMATED⁶/derived data red**

2009	2010	2011	2012	2013
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⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

All data from SAP Profit Centre reporting.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	For OPEX we have used SAP IT Profit and Loss statement. We have deemed all IT Opex costs to be recurrent. Under the assumption that all IT OPEX costs occur consistently enough to meet the definition of recurrent expenditure. Telco costs have been subtracted given that it has already been included in Client Device Expenditure – OPEX. Total Telco costs were allocated to CitiPower based on the percentage of CitiPower’s Business As Usual (BAU) costs to total BAU costs, under the assumption that the split in BAU costs are reflective of the split in Telco costs.
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	An estimate was required because Telco costs which were excluded from total BAU costs were not captured at a CitiPower level
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Telco costs were allocated to CitiPower based on the percentage of CitiPowers Business As Usual (BAU) costs to total BAU costs, under the assumption that the split in BAU costs are reflective of the split in Telco costs”
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The approach selected is assumed to be most reflective of how costs are incurred
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.1 Non Network Expenditure	
Service Subcategory	Asset Category
IT and Communications	RECURRENT EXPENDITURE (CAPEX)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

10.1 If expenditure is directly attributable to an expenditure category in this regulatory template 2.6 it is a Direct Cost for the purposes of this regulatory template. Report all capex and/or opex Direct Costs as required, irrespective of whether any Direct Costs are also classified as Corporate Overheads, Network Overheads or other capex or opex categories. To the extent this results in multiple reporting of expenditures, identify this in accordance with instructions at paragraph 2.3 above.

Non-network IT & Communications Expenditure - Recurrent Expenditure Is all IT & Communications Expenditure that is Recurrent Expenditure excluding any expenditure reported as IT & Communications Expenditure - Client Devices Expenditure.

Please provide a Response in this box:

The information provided complies with section 10.1 of Appendix E, and aligns with the definitions provided in Appendix F.

The information provided complies with section 10.1 of Appendix E given that all direct costs relating to Recurrent Expenditure (CAPEX) have been reported, irrespective of whether they are also classified as Corporate Overheads, Network Overheads or other CAPEX or OPEX categories

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷ data green**; and **ESTIMATED⁸/derived data red**

2009	2010	2011	2012	2013
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⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

All data from Business Intelligence (Function code capital) reports interfaced with SAP..

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>For CAPEX we have used BI Capital report for functions codes 200 (IT Equipment and Computers).</p> <p>We have then manually allocated each individual project between recurrent and non-recurrent using the following principle:</p> <p>Expenditure that is expected to be reasonably consistent from regulatory period to regulatory period (taking into account volume and unit cost drivers) is considered recurrent expenditure</p> <p>As an example recurrent includes but was not limited to : Refresh to infrastructure assets, Upgrades to existing software systems, strategy and tariff refresh programs and change requests performed for the business</p> <p>This has been completed under the assumption that all relevant costs have been captured by these accounts.</p>
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Business Intelligence does not capture IT Capital program expenditure categorised at Recurrent or Non-Recurrent.
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The basis was as per section D, 2009. Considered a percentage allocation which was deemed inappropriate due to the varying nature of IT projects year on year.
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The approach was considered to be the most accurate and consistent way to allocate the data into these categories

2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.1 Non Network Expenditure	
Service Subcategory	Asset Category
IT and Communications	NON-RECURRENT EXPENDITURE (CAPEX)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

10.1 If expenditure is directly attributable to an expenditure category in this regulatory template 2.6 it is a Direct Cost for the purposes of this regulatory template. Report all capex and/or opex Direct Costs as required, irrespective of whether any Direct Costs are also classified as Corporate Overheads, Network Overheads or other capex or opex categories. To the extent this results in multiple reporting of expenditures, identify this in accordance with instructions at paragraph 2.3 above.

Non-network IT & Communications Expenditure - Recurrent Expenditure Is all IT & Communications Expenditure that is Recurrent Expenditure excluding any expenditure reported as IT & Communications Expenditure - Client Devices Expenditure. Non-recurrent expenditure is all expenditure that is not recurrent in relation to the specific category of expenditure.

Please provide a Response in this box:

The information provided complies with section 10.1 of Appendix E, and aligns with the definitions provided in Appendix F.

The information provided complies with section 10.1 of Appendix E given that all direct costs relating to Non-recurrent Expenditure (CAPEX) have been reported, irrespective of whether they are also classified as Corporate Overheads, Network Overheads or other CAPEX or OPEX categories

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁹ data green**; and **ESTIMATED¹⁰/derived data red**

⁹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

All data from Business Intelligence (Function code capital) reports interfaced with SAP...

The financial data for the expenditure categories and cost allocations for the years 2009-2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>For CAPEX we have used BI Capital report for functions codes 200 (IT Equipment and Computers).</p> <p>We have then manually allocated each individual project between recurrent and non-recurrent using the following principle:</p> <p>Expenditure that is expected to be reasonably inconsistent from regulatory period to regulatory period (taking into account volume and unit cost drivers) is considered non-recurrent expenditure</p> <p>As an example Non Recurrent expenditure includes but is not limited to: Initial implementations, stand alone projects and the PABX project due to the one off nature and size of the project and will not be repeated in this manner again.</p> <p>This has been completed under the assumption that all relevant costs have been captured by these accounts.</p> <p>The SAP financial system is used to extract the information required to state the DNSP overhead information by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments with the cost allocation methodology.</p>
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Business Intelligence does not capture IT Capital program expenditure categorised at Recurrent or Non-Recurrent.
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
------	--

2009	The basis was as per section D, 2009. Considered a percentage allocation which was deemed inappropriate due to the varying nature of IT projects year on year.
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The approach was considered to be the most accurate and consistent way to allocate the data into these categories
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.1 Non Network Expenditure	
Service Subcategory	Asset Category
Motor Vehicles	CAPEX

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

APPENDIX E: PRINCIPLES AND REQUIREMENTS

10. NON-NETWORK EXPENDITURE

10.1 If expenditure is directly attributable to an expenditure category in this regulatory template 2.6 it is a Direct Cost for the purposes of this regulatory template. Report all capex and/or opex Direct Costs as required, irrespective of whether any Direct Costs are also classified as Corporate Overheads, Network Overheads or other capex or opex categories. To the extent this results in multiple reporting of expenditures, identify this in accordance with instructions at paragraph 2.3 above.

10.2 For example, and for the avoidance of doubt, Motor Vehicle expenditure directly attributable to direct expenditure categories, for example motor vehicle expenditure directly attributable to activities giving rise to replacement capital expenditure, must be included in the expenditure reported in those replacement capital expenditure categories and any reported unit costs.

10.3 Where a requested value is not constant across a year, calculate an approximate simple average based on the different values over the year and the period for which the different values applied. For example, if CitiPower had 12 vehicles for 8 months and 14 vehicles for 4 months, the average vehicles in the class over the year would be $12 \times (8/12) + 14 \times (4/12) = 12.67$ vehicles.

10.4 Add additional rows to disaggregate cost categories as CitiPower considers required.

10.5 In relation to the Non-network Other expenditure category, if CitiPower has incurred \$1 million or more (nominal) in capital expenditure over the last five regulatory years for a given type or class of assets (e.g. mobile cranes), CitiPower must insert a row in the regulatory template and report that item separately.

APPENDIX F: DEFINITIONS

Car

Cars are Motor Vehicles other than those that comply with the definition of Light commercial vehicle, Heavy commercial vehicle, Elevated work platform (LCV) or Elevated work platform (HCV)

Elevated Work Platform (HCV)

Elevated work platforms (HCV) are Motor Vehicles that have permanently attached elevating work platforms that would be HCVs but for the exclusion of elevated work platforms from the definition of HCV.

Elevated Work Platform (LCV)

Elevated work platforms (LCV) are Motor Vehicles that have permanently attached elevating work platforms that are not Elevated work platform (HCV).

Heavy Commercial Vehicle (HCV)

Heavy commercial vehicles (HCVs) are Motor Vehicles that are registered for use on public roads excluding Elevated Work Platform (HCV)s that:

- have a gross vehicle mass greater than 4.5 tonnes; or
- are articulated Vehicles; or
- are buses with a gross vehicle mass exceeding 4.5 tonnes

Light Commercial Vehicle (LCV)

Light commercial vehicles (LCVs) are Motor Vehicles that are registered for use on public roads excluding elevated work platforms that:

- are rigid trucks or load carrying vans or utilities having a gross vehicle mass greater than 1.5 tonnes but not exceeding 4.5 tonnes; or
- have cab-chassis construction, and a gross vehicle mass greater than 1.5 tonnes but not exceeding 4.5 tonnes; or
- are buses with a gross vehicle mass not exceeding 4.5 tonnes.

Please provide a Response in this box:

Information supplied in the templates has been completed in accordance with requirement sated in Appendix E – Principles and Requirements and Appendix F - Definitions , given that all expenditure that is directly attributable to an expenditure category in Motor Vehicles has been included, irrespective of whether any direct costs are classified as Corporate Overheads, Network Overheads or other CAPEX or OPEX categories

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹¹ data green**; and **ESTIMATED¹²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

CAPEX data extracted from Companies SAP Asset management reporting system
Supporting data available on the following folder T:\MKT_CAT RIN source docs. (T:\MKT_CAT RIN source docs)

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Consolidation of Motor vehicle asset classes into the Service sub categories as set out in RIN template. Source data extracted from SAP using report S_ALR_8702050. Below is break of SAP asset classes and linkage to RIN Service sub categories. Car: 100, 104,105 & 129 Light Commercial: 101,106,107,108, 109, 110 & 125 Elevated Work Platform - LCV: 121 & 122 Elevated Work Platform – HCV: 123 & 124

¹¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	Heavy Commercial: 111, 112, 113,114, 115, 116, 117, 118, 119, 120, 126,128, 203, 204, 205, 206, 208,209, 215,216,217,219 & 220 The function codes above are assumed to contain all the expenditure related to each sub category within Motor Vehicles –CAPEX
2010	Same explanation applies for this year and refers to the explanation provided in 2009.
2011	Same explanation applies for this year and refers to the explanation provided in 2009.
2012	Same explanation applies for this year and refers to the explanation provided in 2009.
2013	Same explanation applies for this year and refers to the explanation provided in 2009.

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Same explanation applies for this year and refers to the explanation provided in 2009.
2011	Same explanation applies for this year and refers to the explanation provided in 2009.
2012	Same explanation applies for this year and refers to the explanation provided in 2009.
2013	Same explanation applies for this year and refers to the explanation provided in 2009.

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Same explanation applies for this year and refers to the explanation provided in 2009.
2011	Same explanation applies for this year and refers to the explanation provided in 2009.
2012	Same explanation applies for this year and refers to the explanation provided in 2009.
2013	Same explanation applies for this year and refers to the explanation provided in 2009.

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Same explanation applies for this year and refers to the explanation provided in 2009.
2011	Same explanation applies for this year and refers to the explanation provided in 2009.
2012	Same explanation applies for this year and refers to the explanation provided in 2009.
2013	Same explanation applies for this year and refers to the explanation provided in 2009.

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.1 Non Network Expenditure	
Service Subcategory	Asset Category
Motor Vehicles	OPEX

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

APPENDIX E: PRINCIPLES AND REQUIREMENTS

10. NON-NETWORK EXPENDITURE

10.1 If expenditure is directly attributable to an expenditure category in this regulatory template 2.6 it is a Direct Cost for the purposes of this regulatory template. Report all capex and/or opex Direct Costs as required, irrespective of whether any Direct Costs are also classified as Corporate Overheads, Network Overheads or other capex or opex categories. To the extent this results in multiple reporting of expenditures, identify this in accordance with instructions at paragraph 2.3 above.

10.2 For example, and for the avoidance of doubt, Motor Vehicle expenditure directly attributable to direct expenditure categories, for example motor vehicle expenditure directly attributable to activities giving rise to replacement capital expenditure, must be included in the expenditure reported in those replacement capital expenditure categories and any reported unit costs.

10.3 Where a requested value is not constant across a year, calculate an approximate simple average based on the different values over the year and the period for which the different values applied. For example, if CitiPower had 12 vehicles for 8 months and 14 vehicles for 4 months, the average vehicles in the class over the year would be $12 \times (8/12) + 14 \times (4/12) = 12.67$ vehicles.

10.4 Add additional rows to disaggregate cost categories as CitiPower considers required.

10.5 In relation to the Non-network Other expenditure category, if CitiPower has incurred \$1 million or more (nominal) in capital expenditure over the last five regulatory years for a given type or class of assets (e.g. mobile cranes), CitiPower must insert a row in the regulatory template and report that item separately.

APPENDIX F: DEFINITIONS

Car

Cars are Motor Vehicles other than those that comply with the definition of Light commercial vehicle, Heavy commercial vehicle, Elevated work platform (LCV) or Elevated work platform (HCV)

Elevated Work Platform (HCV)

Elevated work platforms (HCV) are Motor Vehicles that have permanently attached elevating work platforms that would be HCVs but for the exclusion of elevated work platforms from the definition of HCV.

Elevated Work Platform (LCV)

Elevated work platforms (LCV) are Motor Vehicles that have permanently attached elevating work platforms that are not Elevated work platform (HCV).

Heavy Commercial Vehicle (HCV)

Heavy commercial vehicles (HCVs) are Motor Vehicles that are registered for use on public roads excluding Elevated Work Platform (HCV)s that:

- have a gross vehicle mass greater than 4.5 tonnes; or
- are articulated Vehicles; or
- are buses with a gross vehicle mass exceeding 4.5 tonnes

Light Commercial Vehicle (LCV)

Light commercial vehicles (LCVs) are Motor Vehicles that are registered for use on public roads excluding elevated work platforms that:

- are rigid trucks or load carrying vans or utilities having a gross vehicle mass greater than 1.5 tonnes but not exceeding 4.5 tonnes; or
- have cab-chassis construction, and a gross vehicle mass greater than 1.5 tonnes but not exceeding 4.5 tonnes; or
- are buses with a gross vehicle mass not exceeding 4.5 tonnes.

Please provide a Response in this box:

Information supplied in the templates has been completed in accordance with requirement sated in Appendix E – Principles and Requirements and Appendix F - Definitions

Trailers, cable equipment, cranes, forklifts included into "Heavy Commercial Vehicle Category" - kms are estimated Trailers, cable equipment, cranes, forklifts, previously included in "Other" have been included into "Heavy Commercial Vehicle" Category as a result of the change in Template by the AER

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹³ data green**; and **ESTIMATED¹⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

OPEX data extracted from Companies SAP Asset management reporting system for years 2011, 2012 & 2013. Data from 2009 & 2010 was held in old DRIVE fleet system and it was considered that the data was not reliable. 2009 and 2010 data have been estimated using data from SAP from 2011-2013 years.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Data extrapolated from years 2011, 2012 & 2013 – taking average increase and trending backward, under

¹³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	the assumption that Motor Vehicles OPEX would have trended fairly consistently between 2009-2013.
2010	Refer to 2009
2011	Data extracted from SAP Fleet system using "Fleet Costs" report for each year.
2012	Refer to 2011
2013	Refer to 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Data from 2009 & 2010 was held in old DRIVE fleet system and it was considered that the data was not reliable
2010	Data from 2009 & 2010 was held in old DRIVE fleet system and it was considered that the data was not reliable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Data extrapolated from years 2011, 2012 & 2013 – taking average increase and trending backward
2010	Data extrapolated from years 2011, 2012 & 2013 – taking average increase and trending backward
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Data from DRIVE was considered unreliable and possibly corrupt, the SAP Fleet system considered better quality of data
2010	Data from DRIVE was considered unreliable and possibly corrupt, the SAP Fleet system considered better quality of data
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.1 Non Network Expenditure	
Service Subcategory	Asset Category
BUILDINGS AND PROPERTY	Buildings and Property Expenditure

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

10.1 If expenditure is directly attributable to an expenditure category in this regulatory template 2.6 it is a Direct Cost for the purposes of this regulatory template. Report all capex and/or opex Direct Costs as required, irrespective of whether any Direct Costs are also classified as Corporate Overheads, Network Overheads or other capex or opex categories. To the extent this results in multiple reporting of expenditures, identify this in accordance with instructions at paragraph 2.3 above.

Please provide a Response in this box:

The information provided complies with section 10.1 of Appendix E, and aligns with the definitions provided in Appendix F.

Expenditure directly attributable to non-network buildings and property assets including: the replacement, installation, operation and maintenance of non-network buildings, fittings and fixtures. It includes expenditure related to real chattels (e.g. interests in land such as a lease) but excludes expenditure related personal chattels (e.g. furniture) that should be reported under Non-network Other expenditure.

All expenditure reported in Buildings and Property Expenditure relates to the replacement, installation, operation and maintenance of non-network buildings, fittings and fixtures. It includes expenditure related to real chattels (e.g. interests in land such as a lease) but generally excludes expenditure related personal chattels (e.g. furniture).

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹⁵ data green**; and **ESTIMATED¹⁶/derived data red**

2009	2010	2011	2012	2013
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¹⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

SAP and in particular, the General Ledger and Function Code reporting.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions												
2009	<p>Capital Expenditure (CAPEX) Function Code 230 (corporate and Electricity Networks) was used to extract the actual CAPEX for the Head Office and Depots, under the assumption that all capital costs relating to Building and Property Expenditure have been captured by these function codes.</p> <p>Operating Expenditure (OPEX) A Business Intelligence (BI) report was generated to capture the costs of Corporate business units recorded in specific General Ledger (GL) Accounts. The reports are configured to report only OPEX costs (CAPEX and non-corporate costs captured in the GLs were excluded).</p> <table border="1"> <tr> <td>532500</td> <td>Property Services</td> </tr> <tr> <td>532800</td> <td>Lease: Office Space</td> </tr> <tr> <td>532900</td> <td>Utilities</td> </tr> <tr> <td>583150</td> <td>Land Tax</td> </tr> <tr> <td>591100</td> <td>Water Rates</td> </tr> <tr> <td>591200</td> <td>Council Rates</td> </tr> </table> <p>Additionally, other OPEX related to Buildings and Property is captured in function code 490 . The costs included from function code 490 are based on a specific identification of GL accounts that relate to Head Office and Depot costs.</p>	532500	Property Services	532800	Lease: Office Space	532900	Utilities	583150	Land Tax	591100	Water Rates	591200	Council Rates
532500	Property Services												
532800	Lease: Office Space												
532900	Utilities												
583150	Land Tax												
591100	Water Rates												
591200	Council Rates												
2010	As per 2009.												
2011	As per 2009.												
2012	As per 2009.												
2013	As per 2009.												

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.1 Non Network Expenditure	
Service Subcategory	Asset Category
OTHER	All actual data. <u>Includes</u> basis for items: OTHER EXPENDITURE (OPEX & CAPEX)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

10. NON-NETWORK EXPENDITURE

10.1 If expenditure is directly attributable to an expenditure category in this regulatory template 2.6 it is a Direct Cost for the purposes of this regulatory template. Report all capex and/or opex Direct Costs as required, irrespective of whether any Direct Costs are also classified as Corporate Overheads, Network Overheads or other capex or opex categories. To the extent this results in multiple reporting of expenditures, identify this in accordance with instructions at paragraph 2.3 above.

10.2 For example, and for the avoidance of doubt, Motor Vehicle expenditure directly attributable to direct expenditure categories, for example motor vehicle expenditure directly attributable to activities giving rise to replacement capital expenditure, must be included in the expenditure reported in those replacement capital expenditure categories and any reported unit costs.

10.3 Where a requested value is not constant across a year, calculate an approximate simple average based on the different values over the year and the period for which the different values applied. For example, if CitiPower had 12 vehicles for 8 months and 14 vehicles for 4 months, the average vehicles in the class over the year would be $12*(8/12) + 14*(4/12) = 12.67$ vehicles.

10.4 Add additional rows to disaggregate cost categories as CitiPower considers required.

10.5 In relation to the Non-Network Other expenditure category, if CitiPower has incurred \$1 million or more (nominal) in capital expenditure over the last five regulatory years for a given type or class of assets (e.g. mobile cranes), CitiPower must insert a row in the regulatory template and report that item separately.

Please provide a Response in this box:

Non Network Other expenditure has been reported consistent with the cost allocation methodology, Regulatory Financial Statements and opex categories in place at the time for those regulatory years, with the exception of the 2011 and 2012 years.

CitiPower’s approved CAM for 2011 and 2012 was inconsistent with the AER’s final distribution determination 2011-15 service classification. In December 2013 the AER approved an amended CAM which is consistent with the AER’s final distribution determination 2011-15 service classification. For the purposes of this RIN, CitiPower has deemed that the 2011 and 2012 Regulatory Accounting Statements restated to be consistent with the approved amended CAM are the relevant Regulatory Accounting Statements. On this basis, opex has been reported consistent with the cost allocation methodologies, Regulatory Financial Statements and opex categories that applied in the relevant year.

B. Actual vs. Estimated Data colour coding

2009	No estimated data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No estimated data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.2 ANNUAL DESCRIPTOR METRICS - IT & COMMUNICATIONS EXPENDITURE	
Service Subcategory	Asset Category
IT and Communications	Number of Users

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Active IT system log in accounts used for standard control services work scaled for standard control services use (i.e. an account used 50% of the time for standard control services work equals 0.5 active IT log in accounts)

Please provide a Response in this box:

The information provided complies with section 10 of Appendix E and aligns with the definitions provided in Appendix F.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹⁹ data green**; and **ESTIMATED²⁰/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Total Numbers of users derived from IT budget presentations 2009, 2010, 2011 & 2013, Specific slides - Operating Context & Growth in Physicals to Support) , Numbers originally sourced from VSM infra (IT Asset management tool) and Telephony management tool. User number based on Desktop and Laptop numbers.

¹⁹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	User number is calculated using the Desktop and Laptop numbers less training machines, loan machines and field machines which are not used by an individual user. User number was then allocated based on the % split between CitiPower and Powercor standard control employees, under the assumption that the split is standard control employees reflects the split in Device numbers. The number of employees sourced from ASL labour rates (a separate BOP has been preferred for the ASL model. This has been completed under the assumption that all relevant users have been captured by these records.
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	User number data that was stored is not split between CitiPower & Powercor, standard control and non standard control.
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The basis for estimates was as per section D and E. We considered a direct review of users and allocating them on an individual basis, this was discounted as not enough data was captured at a user level to allow this method of allocation.
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The approach was considered to be the most accurate and consistent way to allocate the data into these categories
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.2 ANNUAL DESCRIPTOR METRICS - IT & COMMUNICATIONS EXPENDITURE	
Service Subcategory	Asset Category
IT and Communications	Number of Devices

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

The number of client devices used to provide standard control services scaled for standard control services use (i.e. a device used 50% of the time for standard control services work equals 0.5 devices).. Client Devices are hardware devices that accesses services made available by a server and may include desktop computers, laptops, tablets and thin client interfaces and handheld end user computing devices including smart phones, tablets and laptops.

Please provide a Response in this box:

The information provided complies with section 10 of Appendix E and aligns with the definitions provided in Appendix .F

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²¹ data green**; and **ESTIMATED²²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

²¹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

²² “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

Response:

Total Numbers of devices derived from IT budget presentations 2009, 2010, 2011 & 2013, Specific slides - Operating Context & Growth in Physicals to Support) , Numbers originally sourced from VSM infra (IT Asset management tool) and Telephony management tool

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Device number calculated using Desktop, laptop, iphone/blackberry (estimate) mobile phone (estimate) numbers Device number has been allocated based on the % split between CitiPower and Powercor standard control employees, under the assumption that the split in standard control employees reflects the split in Device numbers. The number of employees sourced from ASL labour rates (a separate BOP has been preferred for the ASL model). This has been completed under the assumption that all relevant devices have been captured by these records.
2010	Device number calculated using Desktop, laptop, iphone, mobile phone, numbers Device number has been allocated based on the % split between CitiPower and Powercor standard control employees, under the assumption that the split in standard control employees reflects the split in Device numbers. The number of employees sourced from ASL labour rates (a separate BOP has been preferred for the ASL model). This has been completed under the assumption that all relevant devices have been captured by these records.
2011	Device number calculated using Desktop, laptop, iphone, mobile phone, & field mobile device numbers Device number has been allocated based on the % split between CitiPower and Powercor standard control employees, under the assumption that the split in standard control employees reflects the split in Device numbers. The number of employees sourced from ASL labour rates (a separate BOP has been preferred for the ASL model). This has been completed under the assumption that all relevant devices have been captured by these records.
2012	Device number calculated using Desktop numbers (which included laptops), estimated figures for iphone, mobile phone, & field mobile device numbers Device number has been allocated based on the % split between CitiPower and Powercor standard control employees, under the assumption that the split in standard control employees reflects the split in Device numbers. The number of employees sourced from ASL labour rates (a separate BOP has been preferred for the ASL model). This has been completed under the assumption that all relevant devices have been captured by these records.
2013	Device number calculated using Desktop, laptop, iphone, mobile phone, numbers estimated figures for field mobile device numbers Device number has been allocated based on the % split between CitiPower and Powercor standard control employees, under the assumption that the split in standard control employees reflects the split in Device numbers. The number of employees sourced from ASL labour rates (a separate BOP has been preferred for the ASL model). This has been completed under the assumption that all relevant devices have been captured by these records.

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Estimated and derived data was not captured, or stored, data that was stored is not split between CitiPower & Powercor, standard control and non standard control Blackberry – estimate based on number of senior executives known to have been blackberry users Mobile Phones – estimate based on 2010 recorded number of devices
2010	Estimated and derived data was not captured, or stored, data that was stored is not split between CitiPower & Powercor, standard control and non standard control
2011	Estimated and derived data was not captured, or stored, data that was stored is not split between CitiPower & Powercor, standard control and non standard control
2012	Estimated and derived data was not captured, or stored, data that was stored is not split between CitiPower & Powercor, standard control and non standard control

	Iphone/ipads - estimate based on 2011 recorded number of devices Mobile phones - estimate based on 2011 recorded number of devices Field Mobile Devices - estimate based on 2011 recorded number of devices
2013	Estimated and derived data was not captured, or stored, data that was stored is not split between CitiPower & Powercor, standard control and non standard control Field Mobile devices – estimate based on 2011 recorded number of devices

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The basis for estimates was as per section D and E. We considered a direct review of assets and allocating them on an individual basis, this was discounted as not enough data was captured at a user level to allow this method of allocation.
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The approach was considered to be the most accurate and consistent way to allocate the data into these categories
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.6 Non-network	
Table name: 2.6.3 ANNUAL DESCRIPTOR METRICS - MOTOR VEHICLES	
Service Subcategory	Asset Category
Motor Vehicles	(All categories)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Car

Cars are Motor Vehicles other than those that comply with the definition of Light commercial vehicle, Heavy commercial vehicle, Elevated work platform (LCV) or Elevated work platform (HCV)

Elevated Work Platform (HCV)

Elevated work platforms (HCV) are Motor Vehicles that have permanently attached elevating work platforms that would be HCVs but for the exclusion of elevated work platforms from the definition of HCV.

Elevated Work Platform (LCV)

Elevated work platforms (LCV) are Motor Vehicles that have permanently attached elevating work platforms that are not Elevated work platform (HCV).

Heavy Commercial Vehicle (HCV)

Heavy commercial vehicles (HCVs) are Motor Vehicles that are registered for use on public roads excluding Elevated Work Platform (HCV)s that:

- have a gross vehicle mass greater than 4.5 tonnes; or*
- are articulated Vehicles; or*
- are buses with a gross vehicle mass exceeding 4.5 tonnes*

Light Commercial Vehicle (LCV)

Light commercial vehicles (LCVs) are Motor Vehicles that are registered for use on public roads excluding elevated work platforms that:

- are rigid trucks or load carrying vans or utilities having a gross vehicle mass greater than 1.5 tonnes but not exceeding 4.5 tonnes; or*
- have cab-chassis construction, and a gross vehicle mass greater than 1.5 tonnes but not exceeding 4.5 tonnes; or*
- are buses with a gross vehicle mass not exceeding 4.5 tonnes.*

Please provide a Response in this box:

The information provided complies with the definitions in Appendix F
Trailers, cable equipment, cranes, forklifts, previously included in "Other" have been included into "Heavy Commercial Vehicle Category" as a result of the change in Template by the AER

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²³ data green**; and **ESTIMATED²⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data was extracted from SAP Asset Management Reporting system for years 2011- 2013

Data from 2009 & 2010 was held in old DRIVE fleet system and it was considered that the data was not reliable. 2009 and 2010 information have been estimated based on 2011-2013 figures sourced from SAP.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Data was calculated as average of 2011-2013 years, under the assumption that Motor Vehicles metrics trended fairly consistently between 2009-2013
2010	Refer to 2009
2011	Data extracted from SAP Fleet system using "Fleet Costs" report for each year. Sold Vehicles assumed to be sold at 6 months operation (i.e. half year, 0.5 count)
2012	Refer to 2011
2013	Refer to 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Data from 2009 & 2010 was held in old DRIVE fleet system and it was considered that the data was not reliable
2010	Data from 2009 & 2010 was held in old DRIVE fleet system and it was considered that the data was not reliable
2011	Acquisition and Disposal dates for motor vehicles not readily available
2012	See 2012
2013	See 2012

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
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²³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2009	Data extrapolated from years 2011, 2012 & 2013 – taking average increase and trending backward, under the assumption that Motor Vehicles metrics would have trended fairly consistently between 2009-2013.
2010	Refer to 2009
2011	Sold Vehicles assumed to be sold at 6 months operation (i.e. half year, 0.5 count) this is assumed to provide information that is most reflective of the average
2012	Refer to 2011
2013	Refer to 2011

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Data from DRIVE was considered unreliable and possibly corrupt, the SAP Fleet system considered better quality of data
2010	Data from DRIVE was considered unreliable and possibly corrupt, the SAP Fleet system considered better quality of data
2011	An assumption that sold vehicles were sold at 6 months operation is believed to give the best estimate by providing an average
2012	Refer to 2011
2013	Refer to 2011

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

2.7 Vegetation

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation management	
Table name: 2.7.1 - Descriptor metrics by zone	
Asset	Asset
Route length within zone (km)	Urban and CBD, Rural

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

APPENDIX E: PRINCIPLES AND REQUIREMENTS

3. BASIS OF PREPARATION

3.1 CitiPower must explain, for all information in the regulatory templates, the basis upon which CitiPower prepared information to populate the input cells (basis of preparation).

3.2 The basis of preparation must be a separate document (or documents) that CitiPower submits with its completed regulatory templates.

3.3 The basis of preparation must follow a logical structure that enables auditors, assurance practitioners and the AER to clearly understand how CitiPower has complied with the requirements of this Notice.

3.4 At a minimum, the basis of preparation must:

- (a) demonstrate how the information provided is consistent with the requirements of the Notice;
- (b) explain the source from which CitiPower obtained the information provided;
- (c) explain the methodology CitiPower used to provide the required information, including any assumptions CitiPower made; and
- (d) explain circumstances where CitiPower cannot provide input for a variable using actual information, and therefore must provide estimated information:
 - (i) why an estimate was required, including why it was not possible for CitiPower to use actual information;
 - (ii) the basis for the estimate, including the approach used, assumptions made and reasons why the estimate is CitiPower’s best estimate, given the information sought in the Notice.

Descriptor metrics by zone table

12.8 If CitiPower records poles rather than spans, the number of spans is the number of poles less one.

APPENDIX F: DEFINITIONS

Route line length (Vegetation Management)

The aggregate length in kilometres of distribution lines, measured as the length of each span between poles and/or towers, and where the length of each span is considered only once irrespective of how many circuits it contains. This is the distance between line and cable segments and does not include vertical components such as sag.

The length of service lines is not to be included in the route line length.

Response:

With respect to Overhead Conductors

For the year 2013 the data was obtained utilising a GIS (Geographical Information System) query that summates the total of the overhead network span lengths, to determine the total Overhead Route Line Length.

- Spans less than or equal to 10 metres in length were excluded
- Multiple circuit lines within spans were counted as one line

Note:-

- The Overhead Route Line Length includes all spans of high and low voltage greater than 10 metres in length
- Overhead elements associated with communication, protection & control and unmetered loads were excluded
- Overhead elements in the DNSP's area that are owned by another DNSP were excluded

With respect to Underground Cables

For the year 2013 the data could not be obtained utilising a GIS (Geographical Information System) query that summates the total of the underground network section lengths to determine the total Underground Route Line Length, hence an estimate for this metric was used.

These methodologies meet the requirements of this Information Notice to the best of our abilities.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁵ data green**; and **ESTIMATED²⁶/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

With respect to Overhead Conductors

For CitiPower (CP), GIS was the originating data source (i.e. from where the data is obtained).

However, as 2013 was the first year that the Route Line Length variable was required to be evaluated, and since GIS records are not continuously archived, no earlier historical data is available.

In this case:

- For years 2009 to 2012 inclusive, historical consolidated overhead conductor circuit length data, provided by the Annual Regulatory Performance Reports [National Reporting (Annual) tab] and AER Non-Financial RINs [3. Asset Installation tab & 5. General Information tab], were used as the starting point for estimating route lengths.
- For the year 2013 the overhead conductor Circuit Lengths and Route Lengths were both obtained from GIS

With respect to Underground Cables

- For the years 2009 to 2012 inclusive, historical consolidated underground cable circuit length data, provided by the Annual Regulatory Performance Reports [National Reporting (Annual) tab] and AER Non-Financial RINs [3. Asset Installation tab & 5. General Information tab], was used as the starting point for estimating route lengths

For the year 2013, only the underground cable circuit length was obtained from GIS.

²⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p><u>Methodology used to derive historical Route Line Length estimate to align with section A of this Information Notice</u></p> <p><u>With respect to Overhead Conductors</u></p> <ul style="list-style-type: none"> For this year, the Overhead Route Line Length was estimated using the ratio/percentage derived from the known 2013 data of overhead circuit line length and route line length, at each voltage level. These derived ratios/percentages were applied to the overhead circuit line length data available for this year, to obtain Route Line Length data for this year. <p><u>The assumptions made were</u></p> <ul style="list-style-type: none"> The overhead circuit lengths reported in the 2009 Annual Regulatory Report were derived from GIS queries that are reasonably consistent with those currently used Therefore, it is reasonable to use the ratios/percentages derived from the overhead circuit line lengths and overhead route line lengths for the year 2013 to estimate the overhead route line lengths for the year 2009, based on the reported circuit line length data <p><u>With respect to Underground Cables</u></p> <ul style="list-style-type: none"> Data for the year 2013 could not be obtained utilising a GIS query to determine the total Underground Route Line Length Assumptions made to estimate the Underground Route Line Length were as follows: <ul style="list-style-type: none"> For CP CBD the ratio of underground route length to circuit length is 0.50 For CP Urban the ratio of underground route length to circuit length is 0.80
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	<p><u>With respect to Overhead Conductors</u></p> <p>The Overhead Route Line Length data was obtained utilising a query that summates the total of the overhead span lengths in GIS, to determine the Route Line Length.</p> <ul style="list-style-type: none"> Spans less than or equal to 10 metres in length were excluded Multiple circuit lines within spans were counted as one line <p><u>With respect to Underground Cables</u></p> <p>The Underground Route Line Length was estimated using the same methodology as for years 2009 to 2012 inclusive.</p>

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	For both overhead conductors and underground cables the data for Years 2009 to 2012 in CP was not available in the form specified in this Information Notice, hence it was necessary to estimate/derive the requested historical data utilising other data sources, in this case the Annual Regulatory Performance Reports and the 2013 AER Annual RIN report.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	For year 2013 the overhead conductor data complies with this Information Notice (see Response in section A)
	For underground cables the data is estimated/derived as previously described

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p><u>With respect to Overhead Conductors</u></p> <p>The Overhead Circuit Lengths reported in the 2009 to 2012 Annual Regulatory Reports were derived from GIS queries that are reasonably consistent with those used for the 2013 reporting year</p>

	Therefore, it is reasonable for the percentages/ratios derived from the circuit lengths and route lengths for the year 2013 to be used to estimate route lengths for the years 2009 to 2012 inclusive <u>With respect to Underground Cables</u> The ratios of route length to circuit length are based on experience and network installation knowledge to provide a value, as there is no historical context for a more accurate assessment
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	For overhead conductors no estimation or derivation was used For underground cables the data is estimated/derived as previously described

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The approach utilises existing reported data for the overhead component. The approach utilises the described approach for the underground component, as no corresponding route line length data is available
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	The approach utilises existing reported data for the overhead component. The approach utilises the experience and network installation knowledge for the underground component, as no corresponding route line length data is available.

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Data has been provided for all the years requested

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation Management	
Table name: 2.7.1 - Descriptor metrics by zone	
Asset	Urban and CBD
Number of maintenance spans	Number of Maintenance Spans

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Maintenance span A span within CitiPower’s network that is subject to active vegetation management practices in the relevant year. Active vegetation management practices do not include inspection of vegetation maintenance spans.

12.8 If CitiPower records poles rather than spans, the number of spans is the number of poles less one.

Please provide a Response in this box:

CitiPower records vegetation against a span, so the count is as required by definition.

The spans counted are those that are recorded as having had cutting of vegetation so meets definition “A span in CitiPower’s network that is subject to active vegetation management practices in the relevant year. Active vegetation management practices do not include Inspection of vegetation Maintenance Spans”

Feeder categorisation for each year has been linked from relevant annual RIN data for the year therefore categorisation to Urban and CBD is compliant.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁷ data green**; and **ESTIMATED²⁸/derived data red**

2009	2010	2011	2012	2013
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²⁷ “Actual Information” is defined as “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

²⁸ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data base of reference for vegetation is managed by CitiPower's outsourced vegetation management contractor. The vegetation database only records current status of vegetation spans, however regular data file downloads have been received by CitiPower from Vemco and have been used as source.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	The contractor provided data file contains all spans on the network. A pivot table was run on the composite data to count the number of spans which have a cut activity by year and by feeder category per definitions. In order to derive the total number of spans records in the data file download were counted as these represent the span information which was provided to vegetation management contractor to inspect and maintain. The same process was used for all years, however it is anticipated that data accuracy in the source data has improved over time but this is not verifiable. Data exists for CitiPower and Powercor in the same data base record. The relevant company was extracted by using a region code. CTP is CitiPower and all other regions were filtered out for Powercor data.
2010	As above
2011	As above
2012	As above
2013	As above

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable

2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation management	
Table name: 2.7.1 - Descriptor metrics by zone	
Zone	Asset
Zone 1	Total Length Of Maintenance Spans (Km)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

A span within CitiPower's network that is subject to active vegetation management practices in the relevant year. Active vegetation management practices do not include inspection of vegetation maintenance spans.

Please provide a Response in this box:

CitiPower records vegetation against a span, CitiPower has taken the length of spans cut in a year by category.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁹ data green**; and **ESTIMATED³⁰/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data base of reference for vegetation is managed by CitiPower's outsourced vegetation management contractor. The vegetation database only records current status of vegetation spans, however a regular data file is provided by the contractor to CitiPower and these have been used as source. Data files used have been received and stored in various ways over time and so receipt date is unable to be verified.

²⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	CitiPower has extracted the total number of maintenance spans from the data file provided by Vemco. Each individual span was then cross referenced with its span length from data extracted from GIS. A sum of the total length then provided the calculation for this variable.
2010	As per above
2011	As per above
2012	As per above
2013	As per above

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation management	
Table name: 2.7.1 - Descriptor metrics by zone	
Zone	Asset
Zone 1	Length of vegetation corridors (km)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Vegetation corridor A tract of land along which vegetation is maintained in order to form a passageway along the route of a power line or lines (e.g. a shared corridor) that is free of vegetation encroachment into the asset clearance space. This does not include portions of the corridor where no managed vegetation exists (e.g. grassland or heathland) or where vegetation is not managed (e.g. deep gullies/valleys where no vegetation management is undertaken). For clarity, the form of tenure, or lack of tenure, over the corridor are not relevant to the existence of a vegetation corridor.

Please provide a Response in this box:

As the CitiPower network is urban based no corridors exist on the network

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³¹ data green**; and **ESTIMATED³²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

³¹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

³² “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

Response:

No corridors exist in the Urban and CBD feeder categories

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009

2010

2011

2012

2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation Management	
Table name: 2.7.1 - Descriptor metrics by zone	
Asset	Asset Subcategory
Average number of trees per maintenance span (000's)	Urban and CBD

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

The estimated average of the number of trees within CitiPower's vegetation Maintenance Spans. This includes only trees that require active vegetation management to meet its vegetation management obligations. This excludes trees that only require Inspections and no other vegetation management activities required to comply with CitiPower's vegetation obligations

Please provide a Response in this box:

CitiPower records vegetation against a span, so the count is as required by definition.

Feeder categorisation for each year has been linked from relevant annual RIN data for the year therefore categorisation to Urban and CBD is compliant.

CitiPower's contract inspectors do record the work volumes they expect to be carried out, however this is made up of categories for removal, trims, and scrub by square metre. This is not data that is routinely utilised by CitiPower and is not subject to any verification process by CitiPower. This also may vary from the actual work carried out by cutting crews. The number of trees needing action within a span may change between cutting cycles where trees have different clearances and/or growth rates.

The data source for estimation is reported information from Ground Inspection recording those trees for which some cutting action is expected, therefor meeting the AER option for data being "records of vegetation works scoping" and meeting the definition "includes only trees that require active vegetation management to meet its vegetation management obligations".

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³³ data green**; and **ESTIMATED³⁴/derived data red**

2009	2010	2011	2012	2013
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³³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data base of reference for vegetation is managed by CitiPower's outsourced vegetation management contractor. The vegetation database only records current status of vegetation spans, however a regular data file is provided by the contractor to CitiPower and these have been used as source. Data files used have been received and stored in various ways over time and so receipt date is unable to be verified. They have also been received by various officers in the vegetation management area of CitiPower over time.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	: No data was collected in 2009 for tree numbers. Therefore the number reported in 2013 has also been reported for 2009 Assumption made were that the average number of trees as reported in 2013 is considered appropriate to report for previous years given this is expected to be reasonably consistent year on year. For 2010 – 2012
2010	As above
2011	As above
2012	As above
2013	Records were provided by Vegetation management contractor that recorded the number of trees and amount of scrub reported as needing action by their inspector. This may not be the same as actual work carried out, but is believed to be very close. Scrub is used for vegetation with stems less the 4 inches in diameter, and may or may not include vegetation of 3 metres in height as suggested for tree count by AER. Inclusion of allowance for trees over 3 metres in scrub can increase the tree count by 300%, however it has been decided to exclude scrub from the tree count for the Category RIN as there is no basis to estimate the number of trees to include. Availability of, and confidence in, historical data on trees is uncertain and so only 2013 data has been reported. Assumptions need to be made on how many trees over 3 metres may exist in areas only recorded as scrub. Assumptions of 1 or more would be as valid as the assumption of zero that we have used.

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Assumption that 2013 numbers are consistent across all years.
2010	Assumption that 2013 numbers are consistent across all years.
2011	Assumption that 2013 numbers are consistent across all years.
2012	Assumption that 2013 numbers are consistent across all years.
2013	Availability of, and confidence in, historical data on trees is uncertain and so only 2013 data has been reported. Assumptions need to be made on how many trees over 3 metres may exist in areas only recorded as scrub. Assumptions of 1 or more would be as valid as the assumption of zero that we have used.

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As below

2010	As below
2011	As below
2012	As below
2013	<ul style="list-style-type: none"> Records were provided by Vegetation management contractor that recorded the number of trees and amount of scrub reported as needing action by their inspector. This may not be the same as actual work carried out, but is believed to be very close. Scrub is used for vegetation with stems less the 4 inches in diameter, and may or may not include vegetation of 3 metres in height as suggested for tree count by AER. Inclusion of allowance for trees over 3 metres in scrub can increase the tree count by 300%, however it has been decided to exclude scrub from the tree count for the Category RIN as there is no basis to estimate the number of trees to include. Tree numbers actioned per span were linked to maintenance spans through a lookup function and pivot table used to generate averages for required businesses and categories.

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	As above
2010	As above
2011	As above
2012	As above
2013	The approach taken counts only identified trees and avoids escalation of these numbers by using an assumption of trees existing in scrub areas that could not be validated. This will however lead to our trees per span being substantially lower than those who report per the AER guidance of a tree being vegetation over 3 metres.

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation management	
Table name: 2.7.1 - Descriptor metrics by zone	
Zone	Asset
Zone 1	Length of vegetation corridors (km)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Vegetation corridor A tract of land along which vegetation is maintained in order to form a passageway along the route of a power line or lines (e.g. a shared corridor) that is free of vegetation encroachment into the asset clearance space. This does not include portions of the corridor where no managed vegetation exists (e.g. grassland or heathland) or where vegetation is not managed (e.g. deep gullies/valleys where no vegetation management is undertaken). For clarity, the form of tenure, or lack of tenure, over the corridor are not relevant to the existence of a vegetation corridor.

Please provide a Response in this box:

As the CitiPower network is urban based no corridors exist on the network

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁵ data green**; and **ESTIMATED³⁶/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

³⁵ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

³⁶ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

Response:

No corridors exist in the Urban and CBD feeder categories

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009

2010

2011

2012

2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation Management	
Table name: 2.7.1 - Descriptor metrics by zone	
Asset	Asset Subcategory
Average number of trees per maintenance span (000's)	Urban and CBD

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

The estimated average of the number of trees within CitiPower's vegetation Maintenance Spans. This includes only trees that require active vegetation management to meet its vegetation management obligations. This excludes trees that only require Inspections and no other vegetation management activities required to comply with CitiPower's vegetation obligations

Please provide a Response in this box:

CitiPower records vegetation against a span, so the count is as required by definition.

Feeder categorisation for each year has been linked from relevant annual RIN data for the year therefore categorisation to Urban and CBD is compliant.

CitiPower's contract inspectors do record the work volumes they expect to be carried out, however this is made up of categories for removal, trims, and scrub by square metre. This is not data that is routinely utilised by CitiPower and is not subject to any verification process by CitiPower. This also may vary from the actual work carried out by cutting crews. The number of trees needing action within a span may change between cutting cycles where trees have different clearances and/or growth rates.

The data source for estimation is reported information from Ground Inspection recording those trees for which some cutting action is expected, therefor meeting the AER option for data being "records of vegetation works scoping" and meeting the definition "includes only trees that require active vegetation management to meet its vegetation management obligations".

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁷ data green**; and **ESTIMATED³⁸/derived data red**

³⁷ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data base of reference for vegetation is managed by CitiPower's outsourced vegetation management contractor. The vegetation database only records current status of vegetation spans, however a regular data file is provided by the contractor to CitiPower and these have been used as source. Data files used have been received and stored in various ways over time and so receipt date is unable to be verified. They have also been received by various officers in the vegetation management area of CitiPower over time.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	No data was collected in 2009 for tree numbers. Therefore the number reported in 2013 has also been reported for 2009 Assumption made were that the average number of trees as reported in 2013 is considered appropriate to report for previous years given this is expected to be reasonably consistent year on year. For 2010 – 2012
2010	As above
2011	As above
2012	As above
2013	Records were provided by Vegetation management contractor that recorded the number of trees and amount of scrub reported as needing action by their inspector. This may not be the same as actual work carried out, but is believed to be very close. Scrub is used for vegetation with stems less the 4 inches in diameter, and may or may not include vegetation of 3 metres in height as suggested for tree count by AER. Inclusion of allowance for trees over 3 metres in scrub can increase the tree count by 300%, however it has been decided to exclude scrub from the tree count for the Category RIN as there is no basis to estimate the number of trees to include. Availability of, and confidence in, historical data on trees is uncertain and so only 2013 data has been reported. Assumptions need to be made on how many trees over 3 metres may exist in areas only recorded as scrub. Assumptions of 1 or more would be as valid as the assumption of zero that we have used.

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Assumption that 2013 numbers are consistent across all years.
2010	Assumption that 2013 numbers are consistent across all years.
2011	Assumption that 2013 numbers are consistent across all years.
2012	Assumption that 2013 numbers are consistent across all years.
2013	Availability of, and confidence in, historical data on trees is uncertain and so only 2013 data has been reported. Assumptions need to be made on how many trees over 3 metres may exist in areas only recorded as scrub. Assumptions of 1 or more would be as valid as the assumption of zero that we have used.

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As below
2010	As below
2011	As below
2012	As below
2013	<ul style="list-style-type: none"> Records were provided by Vegetation management contractor that recorded the number of trees and amount of scrub reported as needing action by their inspector. This may not be the same as actual work carried out, but is believed to be very close. Scrub is used for vegetation with stems less the 4 inches in diameter, and may or may not include vegetation of 3 metres in height as suggested for tree count by AER. Inclusion of allowance for trees over 3 metres in scrub can increase the tree count by 300%, however it has been decided to exclude scrub from the tree count for the Category RIN as there is no basis to estimate the number of trees to include. Tree numbers actioned per span were linked to maintenance spans through a lookup function and pivot table used to generate averages for required businesses and categories.

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	As above
2010	As above
2011	As above
2012	As above
2013	The approach taken counts only identified trees and avoids escalation of these numbers by using an assumption of trees existing in scrub areas that could not be validated. This will however lead to our trees per span being substantially lower than those who report per the AER guidance of a tree being vegetation over 3 metres.

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation management	
Table name: 2.7.1 - Descriptor metrics by zone	
Zone	CBD and Urban
Zone 1	Average frequency of cutting cycle (years)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Cutting cycle - The average planned number of years (including fractions of years) between which cyclic vegetation maintenance is performed within urban areas, rural areas, and vegetation management zones.

12.10 If CitiPower performs vegetation management work on multiple cutting cycles in urban and CBD, or rural areas within its nominated vegetation management zones, provide a simple average of all the cutting cycles in the relevant area.

Please provide a Response in this box:

CitiPower records vegetation against a span, so the count is as required by definition.

Feeder categorisation for each year has been linked from relevant annual RIN data for the year therefore categorisation to Urban and CBD is compliant.

CitiPower does not have specific cycles for areas but rather the interval for pruning action is based on the particular circumstances of each span and the code allocated indicates the number of years before intervention is expected to be required. This can be more than once per year or periods greater than 5 years. To meet the AER definition we have interpreted area to be the span and have calculated the simple average for all spans in the Feeder classification areas therefore meeting the definition “The planned number of years (including fractions of years) between which cyclic vegetation maintenance is performed for the relevant area.”

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁹ data green**; and **ESTIMATED⁴⁰/derived data red**

³⁹ “Actual Information” is defined as “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁴⁰ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data base of reference for vegetation is managed by CitiPower's outsourced vegetation management contractor. The vegetation database only records current status of vegetation spans, however regular complete database file is received from Vemco by CitiPower and have been used as source.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<ul style="list-style-type: none"> o The data file contains a code which represents the year vegetation is expected to encroach the regulated clearance space. o CitiPower is currently working through a transition program to full compliance. Spans being managed to full compliance are recorded as "transitioned", and full compliance is maintained by attending to the span in the year prior to the expected encroachment year. o For a non transitioned span the clearance cycle was calculated as the period between the cut date and the database code. For transitioned spans the clearance cycle was calculated as above minus 1. o A simple average of spans was then derived in a pivot table. <ul style="list-style-type: none"> • The same process was used for all years, however it is anticipated that data accuracy in the source data has improved over time but this is not verifiable. Data exists for CitiPower and Powercor in the same data base record. The relevant company was extracted by using a region code. CTP is CitiPower and was filtered out for Powercor data. <p>Assumptions</p> <ul style="list-style-type: none"> • The data file from the contractor for each year contains all spans on the network.
2010	As per above
2011	As per above
2012	As per above
2013	As per above

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable

2013	Not Applicable
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Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation management	
Table name: 2.7.2 - Expenditure metrics by zone	
Zone	Service Subcategory
Zone 1	Tree trimming (excluding hazard trees) (\$000's)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Tree trimming - The activity of cutting back trees or other vegetation to remove dead or living parts so as to prevent parts of the tree or vegetation from growing into, falling onto, or blowing onto electricity assets.

12.11 If hazard tree clearance expenditures are not recorded separately, include these expenditures within tree trimming expenditure and shade the cells for hazard tree clearance black. For the Regulatory Years including and after 2015, CitiPower must provide data on hazard tree clearance expenditure.

12.12 If ground clearance works are not recorded separately, include these expenditures within tree trimming expenditure and shade the cells for ground clearance black. For the Regulatory Years including and after 2015 CitiPower must provide data on ground clearance expenditure.

12.13 Only include expenditure on inspections where CitiPower inspects solely for the purpose of assessing vegetation. Include inspection expenditure for inspections assessing both CitiPower’s assets and vegetation under maintenance (regulatory template 2.8). If CitiPower does not record expenditure on inspections of vegetation separately, CitiPower may shade the cells black. For the Regulatory Years including and after 2015, CitiPower must provide data on inspection expenditure.

12.14 If auditing of vegetation management work is not recorded separately, include these expenditures within inspection expenditure. If CitiPower does not record expenditure on audits of vegetation management work separately, CitiPower may shade the cells black. For the Regulatory Years including and after 2015, CitiPower must provide data on auditing expenditure.

12.15 Annual vegetation management expenditure across all categories and zones must sum up to the total vegetation management expenditure each year. In table 2.7.2, add any other vegetation management expenditure not requested in any other part of regulatory template 2.7 (or added in regulatory template 2.8) in total annual vegetation management expenditure. In the basis of preparation, explain the expenditures that have been included in this table.

Please provide a Response in this box:

CitiPower have a fixed price lumpsum contract for all vegetation activities including hazard trees, Information available in the contract in regard to rates along with information supplied by the contractor has been utilised to provide the best available estimate of this requirement.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴¹ data green**; and **ESTIMATED⁴²/derived data red**

⁴¹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

CitiPower have a fixed price lumpsum contract with Vemco for all vegetation activities.

Tree trimming (excluding hazard trees) (\$000's); All Vemco costs are spread across the Lumpsum amount and not provided to CitiPower. Tree trimming has been estimated by subtracting the vegetation corridor clearance cost and inspection cost from the total lumpsum value to provide the tree trimming cost.

Inspection cost; Estimated by the number of inspectors and field managers on the Vemco organisational structure multiplied by the contract hourly rate multiplied by the nominal working hours in a year (1824 hours).

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As below
2010	As below
2011	As below
2012	As below
2013	<p>CitiPower have a fixed price lumpsum contract for all vegetation activities.</p> <p>Tree trimming (excluding hazard trees) (\$000's); All Vemco costs are spread across the Lumpsum amount and not provided to CitiPower. Tree trimming has been estimated by subtracting the vegetation corridor clearance cost and inspection cost from the total lumpsum value to provide the tree trimming cost.</p> <p>Inspection cost; Estimated by the number of inspectors and field managers on the Vemco organisation structure multiplied by the contract hourly rate multiplied by the nominal working hours in a year (1824 hours).</p>

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As below
2010	As below
2011	As below
2012	As below
2013	CitiPower have a fixed price lumpsum contract for all vegetation activities. CitiPower have no breakdown of the costs that make up the Lumpsum.

Year	2. the basis for the estimate, including the approach used, options considered and assumptions
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purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	made; and
2009	As below
2010	As below
2011	As below
2012	As below
2013	<p>Tree trimming (excluding hazard trees) (\$000's); All Vemco costs are spread across the Lumpsum amount and not provided to CitiPower. Tree trimming has been estimated by subtracting the vegetation corridor clearance cost and inspection cost from the total lumpsum value to provide the tree trimming cost.</p> <p>Inspection cost; Estimated by the number of inspectors and field managers on the Vemco org structure multiplied by the contract hourly rate multiplied by the nominal working hours in a year (1824 hours).</p>

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	As below
2010	As below
2011	As below
2012	As below
2013	Given CitiPower does not have a breakdown of this lump sum contract, this approach was considered a best estimate.

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation management	
Table name: 2.7.2 - Cost metrics by zone	
Zone	Service Subcategory
Zone 1	Vegetation corridor clearance (\$000's)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Vegetation corridor - A tract of land along which vegetation is maintained in order to form a passageway along the route of a power line or lines (e.g. a shared corridor) that is free of vegetation encroachment into the asset clearance space. This does not include portions of the corridor where no managed vegetation exists (e.g. grassland or heathland) or where vegetation is not managed (e.g. deep gullies/valleys where no vegetation management is undertaken). For clarity, the form of tenure, or lack of tenure, over the corridor are not relevant to the existence of a vegetation corridor.

Please provide a Response in this box:

As the CitiPower network is urban based, no corridors exist on the network

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴³ data green**; and **ESTIMATED⁴⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

⁴³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Response:

As the CitiPower network is urban based, no corridors exist on the network

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As the CitiPower network is urban based, no corridors exist on the network
2010	As Above
2011	As Above
2012	As Above
2013	As Above

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As the CitiPower network is urban based, no corridors exist on the network
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As the CitiPower network is urban based, no corridors exist on the network
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation management	
Table name: 2.7.2 - EXPENDITURE METRICS BY ZONE	
Zone	SERVICE SUBCATEGORY
Zone 1	Inspection (\$000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Inspection (Vegetation management) - Inspections only for the purpose of identifying of trees or other vegetation that require trimming or removal. This includes vegetation scoping works, use of LiDAR, aerial and other forms of inspections.

Identify one or more vegetation management zones across the geographical area of CitiPower’s network. To do so consider:

- (a) areas where bushfire mitigation costs are imposed by legislation, regulation or ministerial order; and
- (b) areas of the network where other recognised drivers affect the costs of performing vegetation management work.

For each vegetation management zone identified in 12.1 above, provide in the basis of preparation:

- (a) a list of regulations that impose a material cost on performing vegetation management works (including, but is not limited to, bushfire mitigation regulations);
- (b) a list of self-imposed standards from CitiPower’s vegetation management program which apply to that zone; and
- (c) an explanation of the cost impact of regulations and self-imposed standards on performing vegetation management work.

Only include expenditure on inspections where CitiPower inspects solely for the purpose of assessing vegetation. Include inspection expenditure for inspections assessing both CitiPower’s assets and vegetation under maintenance (regulatory template 2.8). If CitiPower does not record expenditure on inspections of vegetation separately, CitiPower may shade the cells black. For the Regulatory Years including and after 2015, CitiPower must provide data on inspection expenditure.

Please provide a Response in this box:

CitiPower have a lumpsum contract for the provision of Vegetation Management. Inspection costs have not been collected separately from the Lumpsum amount. The amount provided in the RIN has been estimated by count the number of inspectors on the Vemco organisational structures for a year multiply by the number of hours in a year multiplied by the hourly contract rates.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁵ data green**; and **ESTIMATED⁴⁶/derived data red**

⁴⁵ “Actual Information” is defined as “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

⁴⁶ ‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

CitiPower have a fixed price lump sum contract for all vegetation activities.

Inspection costs are estimated by the number of inspectors and field managers on the Vemco organisational structure multiplied by the contract hourly rate multiplied by the nominal working hours in a year (1824 hours).

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	CitiPower have a lump sum contract for the provision of Vegetation Management. Inspection costs have not been collected separately from the lump sum amount. The amount provided in the RIN has been estimated by count the number of inspectors on the Vemco organisational structures for a year multiplied by the number of hours in a year multiplied by the hourly contract rates. The assumption made was that all employees with the position of 'inspector' or supervisors responsible for inspection worked a full time employee's hours for the year, and only performed 'inspection' work
2010	As per above
2011	As per above
2012	As per above
2013	As per above

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	An estimate was required because CitiPower have a fixed price lump sum contract for all vegetation activities which is not broken down by work performed.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Inspection costs are estimated by the number of inspectors and field managers on the Vemco organisational structure multiplied by the contract hourly rate multiplied by the nominal working hours in a year (1824 hours).

accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Reason for the selected approach: The Fixed price lump sum contract for all vegetation activities is not broken down by work performed; therefore this approach was considered a best estimate.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation management	
Table name: 2.7.2 - Expenditure metrics by zone	
Zone	Service Subcategory
Zone 1	Contractor liaison expenditure (\$000's)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Contractor liaison - Day-to-day liaison with and management of the contractors involved in undertaking vegetation management work on behalf of CitiPower. This includes but is not limited to the management of work invoices, assigning work to contractors and the review of audits. This excludes actual Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 48 audit work undertaken.

For each vegetation management zone identified in 12.1 above, provide in the basis of preparation:

- (a) a list of regulations that impose a material cost on performing vegetation management works (including, but is not limited to, bushfire mitigation regulations);
- (b) a list of self-imposed standards from CitiPower's vegetation management program which apply to that zone; and
- (c) an explanation of the cost impact of regulations and self-imposed standards on performing vegetation management work.

Please provide a Response in this box:

CitiPower have a fixed price lumpsum contract for all vegetation activities. CitiPower direct vegetation employees are employed to ensure contract compliance, liaising with the contractor on a daily basis.

Contractor liaison; Day-to-day liaison with and management of the contractors involved in undertaking vegetation management work on behalf of CitiPower. This includes but is not limited to the management of work invoices, assigning work to contractors and the review of audits. CitiPower have reported direct labour costs (Vegetation Control) which makes up the balance for "contractor liaison expenditure" therefore meeting the definition of 'contractor liaison'. Page: 75

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁷ data green**; and **ESTIMATED⁴⁸/derived data red**

⁴⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

CitiPower have a fixed price lumpsum contract for all vegetation activities. CitiPower direct vegetation employees are employed to ensure contract compliance, liaising with the contractor on a daily basis.

The numbers provided are only direct cost attributed and does not include the cost for the Vegetation Manager or other CitiPower employees not directly engaged in vegetation management day to day.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Refer Below
2010	Refer Below
2011	Refer Below
2012	Refer Below
2013	The total cost of CitiPower labour was extracted from the total cost of Vegetation expenditure, for the portion that relates to labour. The numbers provided are only direct cost attributed and does not include the cost for the Vegetation Manager or other Citi Power employees not directly engaged in vegetation management day to day.

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable

for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.7 Vegetation Management
Table name: 2.7.3 - Descriptor Metrics Across all Zones - Unplanned Vegetation Events
DESCRIPTOR METRIC
NUMBER OF FIRE STARTS CAUSED BY VEGETATION GROW-INS (NSP RESPONSIBILITY) (0'S)
NUMBER OF FIRE STARTS CAUSED BY VEGETATION BLOW-INS AND FALL-INS (NSP RESPONSIBILITY) (0'S)
NUMBER OF FIRE STARTS CAUSED BY VEGETATION GROW-INS (OTHER PARTY RESPONSIBILITY) (0'S)
NUMBER OF FIRE STARTS CAUSED BY VEGETATION BLOW-INS AND FALL-INS (OTHER PARTY RESPONSIBILITY) (0'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Requirements

Fire start - Any fire:

- that starts in and originates from the reporting NSP's distribution system; or
- started by any tree, or part of a tree which falls or blows in or grows into contact with the reporting NSP's distribution system.

Vegetation blow-ins; Wind-borne tree limbs or bark, coming into contact with CitiPower's network assets

Vegetation grow-ins; Vegetation that has grown into the standard clearance area, coming into contact with CitiPower's network assets

Vegetation fall-ins; Vegetation falling onto a NSP's network assets

Response

CitiPower have reported fire starts from vegetation blow-ins, grow ins etc in accordance with the notice.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁹ data green**; and **ESTIMATED⁵⁰/derived data red**

2009	2010	2011	2012	2013
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⁴⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

CitiPower has not collected the information for fires in the categories required to populate table 2.7.3. CitiPower has sourced the data from reports used to inform the regulator of fire starts, the individual categories have been separated by review of the comments on the fire found in the report. Data has been drawn from F factor report for 2012 and 2013, earlier years data source is a summary of schedule 1 reporting to the regulator.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	The total count of fire starts in each year was determined manually from the F factor reports using the judgement of the subject matter expert. As an estimate, please include assumptions: - Assume that each incident has been appropriately categorised in line with AER requirements. - Due to the element of judgement required in manually determining the categories, the SME (Subject Matter Expert) is assumed to have the appropriate expertise to make this judgement.
2010	As Above
2011	As Above
2012	As Above
2013	As Above

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Estimate was required as data received was not categorised in the same manner as required by the AER
2010	As Above
2011	As Above
2012	As Above
2013	As Above

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	A manual judgement allocation of total fires between each category.
2010	As Above
2011	As Above
2012	As Above
2013	As Above

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	There was no other way to allocate the total count of fires between the categories required by the AER other than SME judgement, therefore this is the best estimate.
2010	As Above
2011	As Above

2012	As Above
2013	As Above

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

	2009	2010	2011	2012	2013
Colour Code	Availability of data		Amount of notional allocations/estimation techniques		
Green	Available and verifiable		Minimal or None		
Yellow	Available but with some gaps		Simple		
Orange	Little or no data available		Complex		
Red	Little or no data available		Impossible		
Black	Not applicable (n/a)		n/a		

2.8 Maintenance

AER CATEGORY ANALYSIS RIN

Tab name: 2.8 Maintenance		
Table name: 2.8.1 - DESCRIPTOR METRICS FOR ROUTINE AND NON-ROUTINE MAINTENANCE (ASSET QUANTITY - AT YEAR END)		
MAINTENANCE ACTIVITY	MAINTENANCE ASSET CATEGORY	UNIT OF MEASURE - ASSET QUANTITY
POLE TOP, OVERHEAD LINE & SERVICE LINE MAINTENANCE	POLE TOPS AND OVERHEAD LINES	NUMBER OF POLES (000'S)
POLE INSPECTION AND TREATMENT	ALL POLES	NUMBER OF POLES (000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

APPENDIX E: PRINCIPLES AND REQUIREMENTS

3. BASIS OF PREPARATION

3.1 CitiPower must explain, for all information in the regulatory templates, the basis upon which CitiPower prepared information to populate the input cells (basis of preparation).

3.2 The basis of preparation must be a separate document (or documents) that CitiPower submits with its completed regulatory templates.

3.3 The basis of preparation must follow a logical structure that enables auditors, assurance practitioners and the AER to clearly understand how CitiPower has complied with the requirements of this Notice.

3.4 At a minimum, the basis of preparation must:

- (a) demonstrate how the information provided is consistent with the requirements of the Notice;
- (b) explain the source from which CitiPower obtained the information provided;
- (c) explain the methodology CitiPower used to provide the required information, including any assumptions CitiPower made; and
- (d) explain circumstances where CitiPower cannot provide input for a variable using actual information, and therefore must provide estimated information:
 - (i) why an estimate was required, including why it was not possible for CitiPower to use actual information;
 - (ii) the basis for the estimate, including the approach used, assumptions made and reasons why the estimate is CitiPower’s best estimate, given the information sought in the Notice.

5.2 Table 2.2.2 instructions:

(a) CitiPower must provide total volume of assets currently in commission and replacement volumes of certain asset groups by specified aggregated metrics. In instances where this information is estimated CitiPower must explain how it has determined the volumes, detailing the process and assumptions used to allocate asset volumes to the aggregated metrics.

APPENDIX F: DEFINITIONS

Installed assets – quantity currently in commission by year

The number of assets currently in commission and the year they were installed.

Poles

These are vertically oriented assets that provide load bearing structural support for overhead conductors or other lines assets.

- This also includes associated pole top structures, such as cross-arms and insulators where these are replaced in conjunction with a pole replacement project.
- It excludes other pole mounted assets that are included in any other asset group, notably pole mounted substations and pole mounted switchgear such as links, fuses, air break switches etc.

Overhead conductors

These assets have the primary function of distributing power, above ground, within the distribution network. It excludes any pole mounted assets that are included in any other asset group.

Please provide a Response in this box:

For the year 2009 to 2013 inclusive the data was obtained utilising a GIS (Geographical Information System) query that traces the in-service network connectivity model in GIS, to determine

1. The circuit line length, which includes all spurs. Each circuit element was evaluated in its own right, for example:
 - SWER lines, single-phase lines, and three-phase lines counted as one line
 - Double circuit lines counted as two lines
 - Overhead elements associated with communication, protection & control and unmetered loads were excluded
 - Overhead elements in the DNSP’s area that are owned by another Distribution Network Service Provider were excluded
2. The number of poles consistent with the above line length evaluation process
3. In this instance the number of poles in the Pole Top, Overhead Line & Service Line Maintenance category and the Pole Inspection and Treatment category as one and the same

This methodology meets the requirements of this Information Notice to the best of our abilities.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵¹ data green**; and **ESTIMATED⁵²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

For CitiPower the Geographical Information System is the originating data source (i.e. from where the data is obtained).

For the years 2013 to 2011 inclusive, the source data is the same data that was used to complete the AER Annual RIN Reports (non-Financial), tab “5. General Information”.

For the years 2009 to 2010 inclusive, the source data is the same data that was used to complete the Annual Regulatory Performance Reports, tab “National Reporting”.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	The number of poles reported is as per the 2009 Annual Regulatory Performance Report.
2010	The number of poles reported is as per the 2010 Annual Regulatory Performance Report.
2011	The number of poles reported is as per the 2011 AER Annual RIN Report.
2012	The number of poles reported is as per the 2012 AER Annual RIN Report.
2013	The number of poles reported is as per the 2013 AER Annual RIN Report.

⁵¹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower’s regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁵² “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Year 2009 for CP complies with this Information Notice (see Response in section A)
2010	Year 2010 for CP complies with this Information Notice (see Response in section A)
2011	Year 2011 for CP complies with this Information Notice (see Response in section A)
2012	Year 2013 for CP complies with this Information Notice (see Response in section A)
2013	Year 2013 for CP complies with this Information Notice (see Response in section A)

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Year 2009 for CP complies with this Information Notice (see Response in section A)
2010	Year 2010 for CP complies with this Information Notice (see Response in section A)
2011	Year 2011 for CP complies with this Information Notice (see Response in section A)
2012	Year 2013 for CP complies with this Information Notice (see Response in section A)
2013	Year 2013 for CP complies with this Information Notice (see Response in section A)

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Year 2009 for CP complies with this Information Notice (see Response in section A)
2010	Year 2010 for CP complies with this Information Notice (see Response in section A)
2011	Year 2011 for CP complies with this Information Notice (see Response in section A)
2012	Year 2013 for CP complies with this Information Notice (see Response in section A)
2013	Year 2013 for CP complies with this Information Notice (see Response in section A)

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Data is provided for all the years requested
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G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.8 Maintenance		
Table name: 2.8.1 - DESCRIPTOR METRICS FOR ROUTINE AND NON-ROUTINE MAINTENANCE (ASSET QUANTITY - AT YEAR END)		
MAINTENANCE ACTIVITY	MAINTENANCE ASSET CATEGORY	UNIT OF MEASURE - ASSET QUANTITY
POLE TOP, OVERHEAD LINE & SERVICE LINE MAINTENANCE	SERVICE LINES	NUMBER OF CUSTOMERS (000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:
No specific requirements in the RIN. Table 2.8.1 requests the number of customers per year.

Please provide a Response in this box:
Data required was provided.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵³ data green**; and **ESTIMATED⁵⁴/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:
Total 2006 -13 customer numbers are obtained from Corporate Finance's end of year reports which are sourced from CitiPower's billing system, CIS Open Vision where NMIs are classed as 'Active'

⁵³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	The reported customer numbers for this section assumes the numbers relate to NMIs set up for billing purposes. Data is obtained by averaging Finance’s prior year’s end of year customer numbers and the current year’s end of year customer numbers and adding estimated 1% of de-energised sites to the total. CISOV is the original source and reports based on the number of active sites. The information provided is in line with the Economic Benchmarking RIN provided to the AER on 30/4/14.
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	CitiPower does not hold historical data in regards to the status of the NMI (i.e. De-energisations) therefore an estimate of de-energised NMIs were obtained from 2013’s end of year position. The estimated number of (1% of de-energised sites) was then added on to the average year end customer numbers for years 2006-2013.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The reported customer numbers for this section assumes the numbers relate to NMIs set up for billing purposes. Data is obtained by averaging Finance’s prior year’s end of year customer numbers and the current year’s end of year customer numbers and adding estimated 1% of de-energised sites to the total. No other option was considered as it would require extensive system changes.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The information provided is in line with the requirements of the Notice. No other option was considered as it would require extensive system changes.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.8 Maintenance
Table name: 2.8.1 - DESCRIPTOR METRICS FOR ROUTINE AND NON-ROUTINE MAINTENANCE
Table name: 2.8.2 - COST METRICS FOR ROUTINE AND NON-ROUTINE MAINTENANCE

Variable Name:

Variable	AER Definition
Pole Top, Overhead Line & Service Line Maintenance	<p>Maintenance of network overhead lines and pole tops, sub transmission & distribution: conveying electricity between zone substations, from zone substations to distribution substations and low voltage lines. Includes Stobie poles for South Australian NSPs. Includes services maintenance (pre-arranged maintenance of CitiPower's services providing supply to customers' premises). Includes:</p> <p>Pole tops and overhead lines maintenance –all direct costs (labour, material, contract, motor vehicle); insulation washing; bird covers and spreaders; maintenance of all pole and conductor hardware and surge diverters not on substation poles. One pole top job will include all the maintenance activity carried out in one work session.</p> <p>Services maintenance –all direct costs (labour, material, contract, motor vehicle); removing, inspecting, testing and re-installation of overhead or underground services and associated equipment; service maintenance including attending to customer complaints not covered by Emergency Response category.</p> <p>Excludes:</p> <p>Pole tops and overhead lines maintenance –Pole Inspection and Treatment; vegetation control; pole replacement or staking; switch maintenance or recall; work on voltage complaints or television and radio interference - investigation & solution not involving capex; replacement of hardware on a pole which is being changed; the replacement of existing conductor other than minor works to ensure continuity and reliability of supply (major replacements are capex). Services maintenance –new connections; removing, inspecting, testing and re-installation of meters and time switches; metering personnel costs; service maintenance on fused junction boxes, joints and terminations; costs to replace any of the above assets with new assets (capex); and underground services installed to replace overhead services in relation to private electricity lines. Excludes vegetation inspection which is captured under Vegetation Management.</p> <p>Excludes poles used solely for providing public lighting services</p> <p>Physical measure: Pole tops and overhead lines – Number of pole tops maintained by zone substation; Services – Number of customer premises maintained.</p>
Pole Inspection and Treatment	<p>All inspection, testing and treatment of sub transmission and/or distribution poles. Includes all direct costs (labour, material, contract, motor vehicle); inspection of network assets including poles, conductors and cross-arms; pole preserving chemical treatments. Includes inspection of vegetation where inspections of both vegetation and poles occur simultaneously. Excludes customers HV lines; LV overhead private electric lines. Excludes inspection of vegetation where inspection is for vegetation only (this is captured under Vegetation Management).</p> <p>Physical measure: Number of poles inspected by zone substation.</p>
Overhead Asset Inspection	<p>All inspection of network overhead assets. Includes all direct costs (labour, material, contract, motor vehicle); thermal survey programs.</p> <p>Physical measure: Route km line patrolled by zone substation</p>

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

11. MAINTENANCE EXPENDITURE

11.1 For expenditure incurred for the simultaneous inspection of assets and vegetation or for access track maintenance, report this expenditure under maintenance, not vegetation management.

11.2 For each of the maintenance subcategories prescribed in the template, add rows for additional subcategories if these are material and necessary to disaggregate financial Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 34 or non-financial data, for example, to disaggregate asset groups according to voltage levels or to specify inspection/ maintenance cycles.

11.3 For each maintenance subcategory, provide in separate columns the data for inspection cycles and maintenance cycles.

11.4 For the inspection cycle for each maintenance subcategory, express this as 'n' in the statement 'every n years'. For example, if the inspection cycle is 'every 6 years', put '6' in the inspection cycle column.

11.5 Similarly, for the maintenance cycle for each maintenance subcategory, express this as 'n' in the statement 'every n years'. For example, if the maintenance cycle is 'every 3 years', put '3' in the maintenance cycle column.

11.6 For inspection and maintenance cycles, asset quantity, and average age of the asset group, use the highest-value (i.e. highest replacement cost) asset type in the asset group as the basis.

11.7 Where there are multiple inspection and maintenance activities, report the cycle that reflects the highest cost activity.

11.8 Adding rows for additional maintenance subcategories to indicate inspection or maintenance cycles (i.e. non-financial data) does not require disaggregating the corresponding financial data for those additional subcategories.

11.9 For 'Asset Quantity', provide in separate columns:

(a) the total number of assets (population) at the end of the regulatory year, for each asset category

(b) the number of assets actually inspected or maintained during the regulatory year, for each asset category

11.10 For 'Other maintenance activity', add rows for maintenance expenditure subcategories if these are material and if these are not yet included in any other maintenance expenditure subcategory.

Please provide a Response in this box:

The physical and financial data for "Pole Top, Overhead Line & Service Line Maintenance", "Pole Inspection and Treatment", and "Overhead Asset Inspection", have been provided in the requested categories.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁵ data green**; and **ESTIMATED⁵⁶/derived data red**

Assets Inspected and Maintained for "Pole Tops and Overhead Lines", "All Poles" and "All Overhead Assets"

Assets at year end for "All Overhead Assets"

Financial Expenditure for "Pole Tops and Overhead Lines", "Service Lines", "All Poles" and "All Overhead Assets"

2009	2010	2011	2012	2013
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Assets Inspected and Maintained for "Service Lines"

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

⁵⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Response:

- All Physical and financial data have been sourced from CitPower's SAP system
- Line patrolled (route km) data was sourced from GIS

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Table 2.8.1 - Methodology & Assumptions – Assets Inspected/Maintained Data</p> <ul style="list-style-type: none"> • All Poles - Pole inspection and treatment: An inspection notification is raised in SAP and attached to a Pole Equipment when that asset is inspected. <ul style="list-style-type: none"> • A count of inspection notifications attached to pole equipment's was used to determine the number of poles inspected each year. • Pole Tops & Overhead Lines – Pole Top, Overhead Line & Service Line Maintenance: A defect notification is raised in SAP where a piece of equipment is identified as requiring attention. As per the AER definition a count of poles containing notifications was used to determine the number of poles maintained each year. • Service Lines - Pole Top, Overhead Line & Service Line Maintenance: There is no customer details associated with the notifications that are raised in SAP it was assumed there is one to one relationship between an aerial service and a customer. <ul style="list-style-type: none"> • A count of aerial services maintained was used to determine the number of customers maintained each year • All Overhead Assets - Overhead Asset Inspection: All sections of all feeders are patrolled on the CitiPower Network as part of the Thermal Inspection program. <ul style="list-style-type: none"> • The total length of conductor patrolled each year was calculated based on the feeders patrolled each year. <p>Table 2.8.2 - Methodology & Assumptions – Cost Metrics Data</p> <p>Pole Top, Overhead Line & Service Line Maintenance:</p> <ul style="list-style-type: none"> • Based on the definition for Non-routine maintenance all maintenance completed has been categorised as Non-Routine as it is based on asset condition. <p>Pole Inspection and Treatment:</p> <ul style="list-style-type: none"> • Based on the definition for Routine maintenance all inspections completed have been categorised as Routine as they are carried out at specific intervals regardless of asset condition. <p>Overhead Asset Inspection:</p> <ul style="list-style-type: none"> • Based on the definition for Routine maintenance all inspections completed have been categorised as Routine as they are carried out at specific intervals regardless of asset condition.
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why was an estimate required, including why it is not possible to use actual data;
2009	<p>Table 2.8.1 – Reason for estimate</p> <p>Service Lines - Pole Top, Overhead Line & Service Line Maintenance:</p>

	<ul style="list-style-type: none"> There is no link between the aerial service asset and the customer information
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Table 2.8.1 – Basis for estimate Service Lines - Pole Top, Overhead Line & Service Line Maintenance: There is no customer details associated with the notifications that are raised in SAP. The most common type of service replaced is to a single installation; on this basis it was assumed there is one to one relationship between an aerial service and a customer.
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Table 2.8.1 – Reason for selected approach Service Lines - Pole Top, Overhead Line & Service Line Maintenance: The most common type of service replaced is to a single installation, on this basis allowing 1 customer per service was determined to be the best estimate.
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

Assets Inspected and Maintained for “Pole Tops and Overhead Lines”, “All Poles” and “All Overhead Assets”
 Assets at year end for “All Overhead Assets”

Financial Expenditure for “Pole Tops and Overhead Lines”, “Service Lines”, “All Poles” and “All Overhead Assets”

2009	2010	2011	2012	2013
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Assets Inspected and Maintained for “Service Lines”

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.8 Maintenance	
Table name: 2.8.1 – DESCRIPTOR METRICS FOR ROUTINE AND NON-ROUTINE MAINTENANCE	
Maintenance Activity	Maintenance Asset Category
NETWORK UNDERGROUND CABLE MAINTENANCE: BY VOLTAGE	(ALL data)
NETWORK UNDERGROUND CABLE MAINTENANCE: BY LOCATION	(ALL data)
DISTRIBUTION SUBSTATION EQUIPMENT & PROPERTY MAINTENANCE	(ALL data)
ZONE SUBSTATION EQUIPMENT MAINTENANCE	(ALL data)
ZONE SUBSTATION PROPERTY MAINTENANCE	(ALL data)
SCADA & NETWORK CONTROL MAINTENANCE	(ALL data)
PROTECTION SYSTEMS MAINTENANCE	(ALL data)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

11. MAINTENANCE EXPENDITURE

11.1 For expenditure incurred for the simultaneous inspection of assets and vegetation or for *access track maintenance*, report this expenditure under maintenance, not *vegetation management*

11.2 For each of the *maintenance* subcategories prescribed in the template, add rows for additional subcategories if these are material and necessary to disaggregate financial Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 34 or non-financial data, for example, to disaggregate asset groups according to voltage levels or to specify inspection/ maintenance cycles.

11.3 For each *maintenance* subcategory, provide in separate columns the data for inspection cycles and maintenance cycles.

11.4 For the *inspection cycle* for each *maintenance* subcategory, express this as ‘n’ in the statement ‘every n years’. For example, if the inspection cycle is ‘every 6 years’, put ‘6’ in the inspection cycle column.

11.5 Similarly, for the *maintenance cycle* for each maintenance subcategory, express this as ‘n’ in the statement ‘every n years’. For example, if the maintenance cycle is ‘every 3 years’, put ‘3’ in the maintenance cycle column.

11.6 For inspection and maintenance cycles, asset quantity, and average age of the asset group, use the highest-value (i.e. highest replacement cost) asset type in the asset group as the basis.

11.7 Where there are multiple inspection and maintenance activities, report the cycle that reflects the highest cost activity.

11.8 Adding rows for additional *maintenance* subcategories to indicate inspection or maintenance cycles (i.e. non-financial data) does not require disaggregating the corresponding financial data for those additional subcategories.

11.9 For ‘Asset Quantity’, provide in separate columns:

- (a) the total number of assets (population) at the end of the regulatory year, for each asset category
- (b) the number of assets actually inspected or maintained during the regulatory year, for each asset category

11.10 For 'Other maintenance activity', add rows for *maintenance* expenditure subcategories if these are material and if these are not yet included in any other *maintenance* expenditure subcategory.

DEFINITIONS

Distribution substation A substation on a distribution network that transforms voltage of levels at or below 33 kV but above 1 kV to levels below 1 kV.

As a guide, assets included within a *distribution substation* include all equipment permanently installed within the *distribution substation* boundary. Where applicable (such as indoor and outdoor substations), this includes any enclosures, structures, civil works, poles and associated hardware, cabling and other assets that are located permanently within the *distribution substation* boundary, but excludes any incoming or outgoing lines or cables. For the avoidance of doubt this does not include any building, structure, equipment, cabling, etc. located within the *substation* boundary that is the property or responsibility of third parties. Where applicable (such as for pole mounted substations), this also includes any poles, pole hardware, pole structures, links, surge diverters, fuses or protective devices, cabling and other assets forming part of the *substation* or its supports, but excluding incoming or outgoing overhead mains, cables and associated cable terminations (cables in this context includes all power, communications and control cables).

Distribution substation equipment & property maintenance

Maintenance of distribution substations, equipment to convert HV distribution to LV, current transformers, voltage transformers, voltage regulators and associated secondary protection and communication equipment.

Equipment maintenance – includes all direct costs (labour, material, contract, motor vehicle); maintenance of distribution switchgear; inspecting, testing and maintaining distribution substations primary and secondary equipment, apparatus and hardware; transformers, earthing, surge diverters, isolators, protection and communication directly associated with the substation; inspecting, testing and maintaining substations and protective apparatus, equipment and hardware; earthing, surge diverters, EDOs and isolators directly associated with the substation; maintenance of site including buildings, fences and cleaning; carrying out replacement of HV fuses not occasioned by fault or emergency work (minor value of replacement, e.g. <\$500).

Property maintenance – includes all direct costs (labour, material, contract, motor vehicle); maintenance of site including buildings, fences and cleaning; weed control.

Excludes upgrades and replacements of equipment which should be capex.

Physical measure: Number of projects completed by distribution substation; Number of substations and voltage regulators maintained by zone substation; Number of distribution substation properties maintained

Distribution substation transformers maintenance

A subset of Distribution Substation Equipment & Property Maintenance. Maintenance of all transformers in distribution substations and associated secondary protection and communication equipment.

Includes all direct costs (labour, material, contract, motor vehicle); maintenance of HV to LV transformers; inspecting, testing and maintaining transformer equipment, apparatus and hardware; protection and communication directly associated with the distribution substation.

Excludes upgrades and replacements of transformers (capex); maintenance of distribution substation equipment other than transformers under Distribution Substation Equipment & Property Maintenance.

Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 50

Physical measure: Number of installed transformers by distribution substation

Distribution switchgear maintenance

Maintenance of distribution network switches.

Includes all direct costs (labour, material, contract, motor vehicle); distribution air break switches; distribution metal clad switchgear; distribution auto-reclosers; pole mounted and ground mounted switchgear; HV and LV switchgear

Physical measure: Number of switches maintained by zone substation.

Inspection cycle The planned or actual duration between two consecutive inspections of an asset

Maintenance Operational repairs and maintenance of the distribution system including high voltage and low voltage assets, and including testing, investigation, validation and correction costs not involving capital expenditure. This also includes location of underground cables and covering of low voltage mains for safety reasons.

Includes the maintenance of public lighting, as well as scheduled maintenance, meter investigations, special readings and photovoltaic (PV) installations

Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 55

For AMI services, includes the maintenance of meters and time switches

Maintenance cycle The planned or actual duration between two consecutive maintenance works on an asset

Network underground cable maintenance

Inspection, testing and maintenance of underground HV distribution and LV cable installations and terminations. Includes all direct costs (labour, material, contract, motor vehicle); power, supervisory and protection cable maintenance and ancillaries such as conduits, tunnels, manholes, cover slabs, sumps and terminations; cable location inquiries; cable maintenance for all voltages; total lengths of distribution feeder cables emanating from a zone substation.

Excludes underground service cable maintenance (see Pole Top, Overhead Line and Services Maintenance); all cables and major replacements inside a zone substation except feeder cables; cable repairs made as part of an emergency or fault restoration and repair of damage caused by other parties.

Physical measure: Length of cables maintained by zone substation; Number of joints.

Non-routine maintenance Costs (opex) of activities predominantly directed at managing asset condition or rectifying Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 61 defects (excluding emergency call-outs). The timing of these activities depends on asset condition and decisions on when to maintain or replace the asset, which may vary over time and across NSPs.

Activities to maintain asset condition and/or to maintain the capacity of the distribution system to distribute electricity, and where the activities are not routine in nature.

The non-routine activities may be undertaken in a discriminate manner for individual assets.

Excludes routine asset maintenance activities.

Excludes activities that are designed to increase or improve the capacity of the distribution system to distribute electricity, except where the increase or improvement is incidental to the maintenance of the distribution system.

Excludes asset removal, asset replacement, new asset installation, vegetation management, and emergency response.

May include:

- activities to inspect, survey, audit, test, repair, alter, or reconfigure assets
 - functional and intrusive testing of assets, including spares and equipment;
- Includes load monitoring and switching activities attributable to non-routine asset maintenance.

Opex The costs of operating and maintaining the network (excluding all capital costs and capital construction costs). Operating expenditure

Routine maintenance Costs (opex) of recurrent/programmed activities undertaken to maintain assets, performed regardless of the condition of the asset. Costs of activities predominantly directed at discovering information on asset condition, and often undertaken at intervals that can be predicted.

Activities to maintain asset condition and/or to maintain the capacity of the distribution system to distribute electricity, and where the activities are:

- routine in nature; and
- indiscriminately carried out for a pre-defined set of assets; and
- scheduled to occur at pre-defined intervals.

May include activities to inspect, survey, audit, test, repair, alter, or reconfigure assets.

A pre-defined interval may be based on the number of times the asset has operated, or any other measure, if the future timing of the maintenance based on the measure can be predicted with a reasonable level of certainty.

Excludes activities that are designed to increase or improve the capacity of the distribution system to distribute electricity, except where the increase or improvement is incidental to the maintenance of the distribution system.

Excludes asset removal, asset replacement, new asset installation, vegetation management, and emergency response.

May include:

- functional and intrusive testing of assets, including spares and equipment;
 - helicopter, vehicle, and foot patrols, including negotiation of landowner access;
 - asset surveys;
 - environmental testing;
 - painting of network assets;
 - re-conductoring lines
 - indoor and outdoor maintenance of substations including lawn mowing, weed control, fencing;
- Includes load monitoring and switching activities attributable to routine asset maintenance.

SCADA Supervisory control and data acquisition

SCADA and Network Control maintenance (opex)

Expenditure associated with the maintenance of SCADA and network control hardware, software and associated IT and communications systems.

Excludes maintenance of Protection Systems, which is a separate subcategory in template 2.7

Maintenance.

Also refer to *SCADA and Network Control Expenditure* definition (capex).

Zone substation A substation on a distribution network that transforms any voltage above 33 kV to levels at or below 33 kV but above 1 kV.

As a guide, assets included within a *zone substation* include all equipment, buildings, structures, *civil works* and other assets that are located permanently within the *substation* boundary fence; but excluding the landing spans of incoming or outgoing *overhead lines*, and excluding incoming or outgoing cables and associated cable terminations (cables includes all power, communications and control cables).

Zone substation equipment maintenance

Maintenance of zone substations, equipment to convert sub transmission voltage to distribution voltage, current transformers, voltage transformers and associated secondary protection and communication equipment.

Includes all direct costs (labour, material, contract, motor vehicle); maintenance of sub transmission switchgear; inspecting, testing and maintaining zone substations primary and secondary equipment, apparatus and hardware; transformers, earthing, surge diverters, isolators, protection and communication directly associated with the substation.

Includes maintenance of distribution equipment within the zone substation.

Excludes upgrades and replacements which should be capex; Zone Substation Property Maintenance.

Physical measure: Number of zone substation assets, e.g. number of transformers

Zone substation property maintenance

Includes all direct costs (labour, material, contract, motor vehicle); maintenance of site including buildings, fences and cleaning; weed control.

Excludes Zone Substation Equipment Maintenance and Zone Substation Transformer Maintenance

Physical measure: Number of zone substation properties maintained

Zone substation transformers maintenance

A subset of Zone Substation Equipment Maintenance. Maintenance of all transformers in zone substations and associated secondary protection and communication equipment.

Includes all direct costs (labour, material, contract, motor vehicle); maintenance of HV to LV transformers; inspecting, testing and maintaining transformer equipment, apparatus and hardware; protection and communication directly associated with the zone substation.

Excludes upgrades and replacements of transformers which should be capex; maintenance of zone substation equipment other than transformers under Zone Substation Equipment Maintenance.

Physical measure: Number of installed voltage transformers by zone substation

Please provide a Response in this box:

The data provided complies with the instructions and definitions specified in the CA RIN except for the clauses below.

11.4 A response cannot be accurately provided to this request as CitiPower utilise varied time based maintenance plans which are determined by a number of factors including risk, utilisation and specifics of individual populations. (ie manufacturer / model / age specific etc.). Condition based maintenance is also utilised and calibrated to population specifics. This information cannot be transposed into the format requested.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁷ data green**; and **ESTIMATED⁵⁸/derived data red**

⁵⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

ASSET QUANTITY - AT YEAR END

- The 2013, 2012 and 2011 Asset Instillation information from the annual CitiPower AER RIN's were utilised for equipment quantities and average age calculations.

ASSET QUANTITY - INSPECTED/ MAINTAINED

- A list of projects was obtained from SAP Business Intelligence (BI) reports.
- Plant Maintenance (PM) Orders were extracted from SAP
- Functional location details were extracted from SAP.
- Equipment details were extracted from SAP

AVERAGE AGE OF ASSET GROUP

- The 2013, 2012 and 2011 Asset Instillation information from the annual CitiPower AER RIN's were utilised for equipment quantities and average age calculations.

INSPECTION CYCLE (YEARS)

- CitiPower maintenance policies, maintenance contract scopes or SAP maintenance strategy configuration.

MAINTENANCE CYCLE (YEARS)

- CitiPower maintenance policies, maintenance contract scopes or SAP maintenance strategy configuration.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Response:</p> <p>ASSET QUANTITY - AT YEAR END AER annual RIN reporting information was mapped it into the new AER Category RIN structure requirements. This data was then re-allocated to determine the average age and total assets installed at year end to provide data which is compliant with AER requirements. Were data was not present in the previous iterations of reports an average was applied to populate the table.</p> <p>ASSET QUANTITY - INSPECTED/ MAINTAINED SAP maintenance orders were categorised and mapped into the AER CAT RIN categories. These orders were then counted in each category for each year.</p> <p>Please refer to the BoP for table 2.8.2 which includes further information in relation to the determination of maintenance counts.</p> <p>AVERAGE AGE OF ASSET GROUP AER annual RIN reporting information was mapped it into the new AER Category RIN structure requirements. This data was then re-allocated to determine the average age and total assets installed at</p>

accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>year end to provide data which is compliant with AER requirements. Where data was not present in the previous iterations of reports an average was applied to populate the table.</p> <p>INSPECTION CYCLE (YEARS) The inspection cycles information is equal to that of the maintenance cycles for the asset types considered in this BoP.</p> <p>MAINTENANCE CYCLE (YEARS) Where possible a direct population of the table was undertaken from information obtained by CitiPower asset maintenance policy. A response could not be accurately provided to this request at all times as CitiPower utilise varied time based maintenance plans which are determined by a number of factors including risk, utilisation and specifics of individual populations. (ie manufacturer / model / age specific etc.). Condition based maintenance (not time dependant) is also utilised and calibrated to population specifics. This information cannot be transposed into the format requested.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>Estimation is required in this instance:</p> <p>ASSET QUANTITY - AT YEAR END</p> <ul style="list-style-type: none"> The data set previously provided to the AER did not cover all categories requested in this iteration. All the requested data was not available. <p>ASSET QUANTITY - INSPECTED/ MAINTAINED</p> <ul style="list-style-type: none"> In order to bridge the differences in definitions between CitiPower Function Code accounts, the Regulatory Category Asset Classes, and the new AER CAT RIN classes which do not result in direct mapping. CitiPower function code definitions, for function codes 316, 317, 318, 319, 350, 442 & 492 are broader than the Category Asset Classes and, in some cases, the Category Asset Groups. For expenditure to be allocated to an Asset Class definition gap must be bridged. <p>AVERAGE AGE OF ASSET GROUP</p> <ul style="list-style-type: none"> The data set previously provided to the AER did not cover all categories requested in this iteration. All the requested data was not available. <p>INSPECTION CYCLE (YEARS)</p> <ul style="list-style-type: none"> Not Applicable <p>MAINTENANCE CYCLE (YEARS)</p> <ul style="list-style-type: none"> Not Applicable
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Estimation is based on:</p> <p>ASSET QUANTITY - AT YEAR END</p> <ul style="list-style-type: none"> Information previously provided to the AER as part of yearly metric reporting. Previously reported information was used as the basis for extrapolation.

	<p>ASSET QUANTITY - INSPECTED/ MAINTAINED</p> <ul style="list-style-type: none"> The manual allocation of an AER category to each PMOrder. This allocation is based on the PMOrder linking to equipment and / or functional location in order to be mapped. PMOrders which were not linked were ignored in the allocation exercise. <p>AVERAGE AGE OF ASSET GROUP</p> <ul style="list-style-type: none"> Information previously provided to the AER as part of yearly metric reporting. Previously reported information was used as the basis for extrapolation. <p>INSPECTION CYCLE (YEARS)</p> <ul style="list-style-type: none"> Not Applicable <p>MAINTENANCE CYCLE (YEARS)</p> <ul style="list-style-type: none"> Not Applicable
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	<p>This method was selected as:</p> <p>ASSET QUANTITY - AT YEAR END</p> <ul style="list-style-type: none"> It was extrapolated from previously reported and accredited information. <p>ASSET QUANTITY - INSPECTED/ MAINTAINED</p> <ul style="list-style-type: none"> It provided the most accurate result considering the differences in data structure requirements. <p>AVERAGE AGE OF ASSET GROUP</p> <ul style="list-style-type: none"> It was extrapolated from previously reported and accredited information. <p>INSPECTION CYCLE (YEARS)</p> <ul style="list-style-type: none"> Not Applicable <p>MAINTENANCE CYCLE (YEARS)</p> <ul style="list-style-type: none"> Not Applicable
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

In areas where the inspection / maintenance cycle could not be populated the table has been left **blank** and the following statement applies:

A response cannot be accurately provided to this request as CitiPower utilise varied time based maintenance plans which are determined by a number of factors including risk, utilisation and specifics of individual populations. (ie manufacturer / model / age specific etc.). Condition based maintenance (not time dependant) is also utilised and calibrated to population specifics. This information cannot be transposed into the format requested.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.8 Maintenance	
Table name: 2.8.1 – Descriptor Metrics for Routine & Non-Routine Maintenance	
Asset Group	Maintenance Asset Category
Public Lighting	(ALL)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

11. MAINTENANCE EXPENDITURE

11.1 For expenditure incurred for the simultaneous inspection of assets and vegetation or for access track maintenance, report this expenditure under maintenance, not vegetation management.

11.2 For each of the maintenance subcategories prescribed in the template, add rows for additional subcategories if these are material and necessary to disaggregate financial Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 34

or non-financial data, for example, to disaggregate asset groups according to voltage levels or to specify inspection/maintenance cycles.

11.3 For each maintenance subcategory, provide in separate columns the data for inspection cycles and maintenance cycles.

11.4 For the inspection cycle for each maintenance subcategory, express this as ‘n’ in the statement ‘every n years’. For example, if the inspection cycle is ‘every 6 years’, put ‘6’ in the inspection cycle column.

11.5 Similarly, for the maintenance cycle for each maintenance subcategory, express this as ‘n’ in the statement ‘every n years’. For example, if the maintenance cycle is ‘every 3 years’, put ‘3’ in the maintenance cycle column.

11.6 For inspection and maintenance cycles, asset quantity, and average age of the asset group, use the highest-value (i.e. highest replacement cost) asset type in the asset group as the basis.

11.7 Where there are multiple inspection and maintenance activities, report the cycle that reflects the highest cost activity.

11.8 Adding rows for additional maintenance subcategories to indicate inspection or maintenance cycles (i.e. non-financial data) does not require disaggregating the corresponding financial data for those additional subcategories.

11.9 For ‘Asset Quantity’, provide in separate columns:

- (a) the total number of assets (population) at the end of the regulatory year, for each asset category
- (b) the number of assets actually inspected or maintained during the regulatory year, for each asset category

11.10 For ‘Other maintenance activity’, add rows for maintenance expenditure subcategories if these are material and if these are not yet included in any other maintenance expenditure subcategory.

Definitions

Opex Category: Means operating expenditure associated with the following categories:

- Non-network expenditures
- Vegetation management
- Maintenance
- Emergency response
- Network Overheads and Corporate Overheads

Maintenance: Operational repairs and maintenance of the distribution system including high voltage and low voltage assets, and including testing, investigation, validation and correction costs not involving capital expenditure. This also includes location of underground cables and covering of low voltage mains for safety reasons. Includes the maintenance of public lighting, as well as scheduled maintenance, meter investigations, special readings and

photovoltaic (PV) installations Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 55 For AMI services, includes the maintenance of meters and time switches

Public lighting maintenance: Expenditure associated with the maintenance, repair or inspection of public lighting assets on major roads and minor roads Includes all direct costs (labour, material, contract, motor vehicle) Physical Measure: Number of public lights serviced by zone substation; Number of kilometres patrolled by zone substation.

Light maintenance: The operating cost associated with the repair and inspection of the following public lighting assets on a major or minor road:

- Luminaires
- Brackets
- Lamps
- Poles dedicated to public lighting services; and
- Underground or overhead cabling dedicated to public lighting services.

Light maintenance should include the operational repairs and inspection of the public lighting assets, not including capital expenditure.

Routine maintenance: Costs (opex) of recurrent/programmed activities undertaken to maintain assets, performed regardless of the condition of the asset. Costs of activities predominantly directed at discovering information on asset condition, and often undertaken at intervals that can be predicted.

Activities to maintain asset condition and/or to maintain the capacity of the distribution system to distribute electricity, and where the activities are:

- routine in nature; and
- indiscriminately carried out for a pre-defined set of assets; and
- scheduled to occur at pre-defined intervals.

May include activities to inspect, survey, audit, test, repair, alter, or reconfigure assets. A pre-defined interval may be based on the number of times the asset has operated, or any other measure, if the future timing of the maintenance based on the measure can be predicted with a reasonable level of certainty.

Excludes activities that are designed to increase or improve the capacity of the distribution system to distribute electricity, except where the increase or improvement is incidental to the Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 67 maintenance of the distribution system.

Excludes asset removal, asset replacement, new asset installation, vegetation management, and emergency response.

May include:

- functional and intrusive testing of assets, including spares and equipment;
- helicopter, vehicle, and foot patrols, including negotiation of landowner access;
- asset surveys;
- environmental testing;
- painting of network assets;
- re-conductoring lines
- indoor and outdoor maintenance of substations including lawn mowing, weed control, fencing;

Includes load monitoring and switching activities attributable to routine asset maintenance.

Non-routine maintenance: Costs (opex) of activities predominantly directed at managing asset condition or rectifying Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 61 defects (excluding emergency call-outs). The timing of these activities depends on asset condition and decisions on when to maintain or replace the asset, which may vary over time and across NSPs.

Activities to maintain asset condition and/or to maintain the capacity of the distribution system to distribute electricity, and where the activities are not routine in nature. The non-routine activities may be undertaken in a discriminate manner for individual assets. Excludes routine asset maintenance activities. Excludes activities that are designed to increase or improve the capacity of the distribution system to distribute electricity, except where the increase or improvement is incidental to the maintenance of the distribution system.

Excludes asset removal, asset replacement, new asset installation, vegetation management, and emergency response.

May include:

- activities to inspect, survey, audit, test, repair, alter, or reconfigure assets
- functional and intrusive testing of assets, including spares and equipment;

Includes load monitoring and switching activities attributable to non-routine asset maintenance. Normal cyclic rating The maximum peak loading based on a given daily load cycle that an asset or element of the network can supply each day of its life under normal conditions resulting in a normal rate of wear. CitiPower must provide its definition(s) of 'normal conditions'.

Maintenance cycle: The planned or actual duration between two consecutive maintenance works on an asset

Inspection cycle: The planned or actual duration between two consecutive inspections of an asset

Major road: Roads on which the visual requirements of motorists are dominant (e.g. traffic routes). Typically the responsibility of a state or territory road authority.

Minor road: Roads on which the visual requirements of pedestrians are dominant (e.g. local roads and lighting that is applicable to areas other than roads outdoor public areas, e.g. outdoor shopping). Typically the responsibility of a local Government authority.

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 2.2.1 Cost Metrics by asset category for Public Lighting. We have provided data that complies with the instructions and definitions specified in the requirements as follows:

11 Maintenance Expenditure

11.1 not applicable

11.2 not applicable

11.3 not applicable

11.4 The inspection cycle has been expressed in 'n' years

11.5 The maintenance cycle has been expressed in 'n' years

11.6 not applicable

11.7 not applicable

11.8 not applicable

11.9 (a) total number of assets (population) at the end of the regulatory year has been provided

(b) total number of assets inspected/maintained during that regulatory year has been provided

11.10 not applicable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁹ data green**; and **ESTIMATED⁶⁰/derived data red**

ASSETS AT YEAR END

2009	2010	2011	2012	2013
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ASSETS INSPECTED/MAINTAINED

2009	2010	2011	2012	2013
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AVERAGE AGE OF ASSET GROUP

2009	2010	2011	2012	2013
------	------	------	------	------

INSPECTION CYCLE (YEARS)

2009	2010	2011	2012	2013
------	------	------	------	------

MAINTENANCE CYCLE (YEARS)

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a

⁵⁹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

ASSETS AT YEAR END

- The source data was extracted from GIS listing all billable lights on the last day of the reportable year.

ASSETS INSPECTED/MAINTAINED

- Assets inspected/maintained: The source data was extracted from Public Light Fault Management System (PLFMS) that listed all non-routine maintenance activities.

AVERAGE AGE OF ASSET GROUP

- The source data was extracted from GIS listing all billable lights on the last day of the 2013 reportable year.

INSPECTION CYCLE (YEARS)

- Major Road – requirement of Public Lighting Code 2005 (Victoria) for all arterial roads
- Minor Road – no inspection cycle for minor road lights

MAINTENANCE CYCLE (YEARS)

- Major Road – no maintenance cycle for major road lights
- Minor Road – requirement of Public Lighting Code 2005 (Victoria) for all residential roads

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>ASSETS AT YEAR END</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> • Per definition, for 11.9 (a) ‘Asset Quantity’ total number of assets (population) at the end of the regulatory year have been provided • Per definition, for major roads & minor roads, assets were allocated to these sub-categories based on cost sharing status. <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> • Assumption that all lights ‘full cost (municipality)’ are reported as ‘minor roads’ • Assumption that all lights ‘cost shared (municipality/state road authority) are reported as ‘major roads’ <p>ASSETS INSPECTED/MAINTAINED</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> • Minor roads are maintained every four years to enable re-lamping <ul style="list-style-type: none"> ◦ Replacement of the photo electric cell (PE Cell) every eight years was completed at the same time as the re-lamping and was not included in the volume calculation • Major Roads were maintained every four years to enable re-lamping and every eight years for replacement of PE Cell (up to 2010) . <ul style="list-style-type: none"> ◦ Replacement of the photo electric cell (PE Cell) every eight years was completed at the same time as the re-lamping and was not included in the volume calculation ◦ After 2010 lamps were replaced as required through 3 yearly patrols and public reports received. • All faults attended in the respective year were also included as they were in addition to the programmed maintenance • Actual volumes of asset non routine maintenance (where available) are extracted from PLFMS and allocated to asset sub-categories as listed above for major and minor roads. <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> • Minor Roads – assumed that all lamps were replaced on a four yearly cycle and both lamps and pe cells replaced on the following four year cycle. In addition, non routine maintenance is included in the total assets inspected/maintained at the end of the regulatory year reported. • Major Roads – assumed that all lamps were replaced on a four yearly cycle and both lamps and pe cells replaced on the following four year cycle up to 2010. After 2010, routine maintenance comprised of three yearly patrols as required. In addition non, routine maintenance is included in the total assets inspected/maintained at the end of the regulatory year reported. <p>AVERAGE AGE OF ASSET GROUP</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> • Per definition of “assets in commission” only in service and billable lights as at 1/1/14 were extracted from GIS.

	<ul style="list-style-type: none"> Asset quantity recorded were allocated across the years 1910 – 2013 using information recorded relating to “year lantern manufactured” Average age of public lighting luminaires was calculated by multiplying the total number of luminaires by the age of luminaire (where age = 1 for 2013, age = 2 for 2012 etc.) then dividing by the total number of luminaires reported at the end of the 2013 regulatory year. <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Only in service and billable lights were reported Cost share status was used to separate between major road and minor road in order to meet the definition of major/minor roads per the definition. Where ‘Year Lantern Changed’ = 1960, 1970 & 2001 and ‘Year Lantern Manufactured’ varied, ‘Year Lantern Manufactured’ was used in preference to ‘Year Lantern Changed’. Where ‘Year Lantern Changed’ ≠ 1960, 1970 & 2001, no change was made and ‘Year Lantern Changed’ was taken to represent the year the asset was commissioned. Where cost share status = full cost (VicRoads) or ‘other’, these were added to major road Note: this only affected 14 lights in total <p>INSPECTION CYCLE (YEARS)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition of inspection cycle only major road lights are required to inspected on a routine basis <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Minor Road – no inspection cycle for minor road lights Major Road –3 patrols completed as required by Public Lighting Code 2005 (Victoria) for all arterial roads <p>MAINTENANCE CYCLE (YEARS)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition of maintenance cycle only minor road lights are required to maintained on a routine basis <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Minor road – lamps replaced on a four yearly cycle, PE Cells replaced every eight years as required by Public Lighting Code 2005 (Victoria) for all residential roads Major road – no maintenance cycle for major road lights
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>ASSETS AT YEAR END</p> <ul style="list-style-type: none"> No data was estimated or derived <p>ASSETS INSPECTED/MAINTAINED</p> <ul style="list-style-type: none"> Business does not currently record individual public light maintenance programs which made it impossible to determine exact numbers of lamp replacements in a given year. <p>AVERAGE AGE OF ASSET GROUP</p> <ul style="list-style-type: none"> Significant data was unusable due to ‘default’ dates being used for ‘Date Lantern Changed’ such as ‘1/01/1960’, ‘1/01/1970’ & ‘1/08/2001’. A separate field was also available ‘Year Lantern Manufactured’, this year was also compromised as it appeared that it had not been maintained throughout the time period. Data was unable to be verified to confirm actual year of replacement due to data migration to GIS. Data entered has not been consistently validated to ensure that accuracy was correctly entered. Assumptions listed above were used to provide a slightly more accurate age profile of Luminaires, however there are still large gaps and default dates still used that distorts the data. Per definition of “assets in commission” only in service and billable lights as at 1/1/14 were extracted from GIS. Only the 2013 reported regulatory year data was used due to the significant data manipulation required to establish an age profile. <p>INSPECTION CYCLE (YEARS)</p> <ul style="list-style-type: none"> No data was estimated or derived

	MAINTENANCE CYCLE (YEARS) <ul style="list-style-type: none"> No data was estimated or derived
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>ASSETS AT YEAR END</p> <ul style="list-style-type: none"> No data was estimated or derived <p>ASSETS INSPECTED/MAINTAINED</p> <p>Approach used:</p> <ul style="list-style-type: none"> Details available in systems available did not provide any conclusive evidence regarding the number of assets maintained/inspected. Current maintenance cycles are based on municipal boundaries and not physical luminaires. No allowance has been made for pole inspections where a visual inspection is performed. No allowance has been made for patrols required as part of the Public Lighting Code for arterial roads. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Volumes were not available for routine maintenance <p>Assumptions made:</p> <ul style="list-style-type: none"> The definition as per the RIN required that all roads managed by state road authorities be classified as 'major roads', roads managed by municipal councils classified as 'minor roads.' Business retains some information of non-routine maintenance by asset categories and this was used where available. Allocation to major road / minor road was not retained historically. Allocation was completed using cost sharing,(full cost & cost shared) as the best fit to the RIN definition. <p>AVERAGE AGE OF ASSET GROUP</p> <p>Approach used:</p> <ul style="list-style-type: none"> 'Cost Share Status' was used to separate between major road and minor road in order to meet the definition of major/minor roads per the RIN. The major and minor road classifications maintained within GIS relate to the type of globe used rather than the road location and hence these internal classifications did meet the definitions in the RIN. Where 'Year Lantern Changed' = 1960, 1970 & 2001 and 'Year Lantern Manufactured' varied, 'Year Lantern Manufactured' was used in preference to 'Year Lantern Changed' in order to reduce the distortion caused by default dates as these were assumed to be more accurate dates. Where 'Cost Share Status' = 'Full Cost (VicRoads) or 'other', these were added to 'Cost Shared (4/10)(6/10)' *** Note: this only affected 14 lights in total. This was because lights fully allocated to VicRoads were reasonably assumed to be on major roads and hence included in that category. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset ages revealed that the business has not historically been required to report on this and has not been appropriately maintained. No other option was available to source the data. <p>Assumptions made:</p> <ul style="list-style-type: none"> The definition as per the RIN required that all roads managed by state road authorities be classified as 'major roads', roads managed by municipal councils classified as 'minor roads.' Business retains some information of 'Year Lantern Manufactured' and 'Year Lantern Changed' however significant data was unreliable or inconsistent and was modified where possible. <p>INSPECTION CYCLE (YEARS)</p> <ul style="list-style-type: none"> No data was estimated or derived <p>MAINTENANCE CYCLE (YEARS)</p> <ul style="list-style-type: none"> No data was estimated or derived
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other reliable data is available for the period required.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

ASSETS AT YEAR END

2009	2010	2011	2012	2013
------	------	------	------	------

ASSETS INSPECTED/MAINTAINED

2009	2010	2011	2012	2013
------	------	------	------	------

AVERAGE AGE OF ASSET GROUP

2009	2010	2011	2012	2013
------	------	------	------	------

INSPECTION CYCLE (YEARS)

2009	2010	2011	2012	2013
------	------	------	------	------

MAINTENANCE CYCLE (YEARS)

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.8 Maintenance		
Table name: 2.8.1 – DESCRIPTOR METRICS FOR ROUTINE AND NON-ROUTINE MAINTENANCE		
Variable Name: AVERAGE AGE OF ASSET GROUP		
MAINTENANCE ACTIVITY	MAINTENANCE ASSET CATEGORY	UNIT OF MEASURE – ASSET QUANTITY
POLE TOP, OVERHEAD LINE & SERVICE LINE MAINTENANCE	POLE TOPS AND OVERHEAD LINES	NUMBER OF POLES (000,S)
POLE TOP, OVERHEAD LINE & SERVICE LINE MAINTENANCE	SERVICE LINES	NUMBER OF CUSTOMERS (000'S)
POLE INSPECTION AND TREATMENT	ALL POLES	NUMBER OF POLES (000,S)
OVERHEAD ASSET INSPECTION	ALL OVERHEAD ASSETS	LINE PATROLLED (ROUTE KM) (000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

APPENDIX E: PRINCIPLES AND REQUIREMENTS

11. MAINTENANCE EXPENDITURE

- 11.1. For expenditure incurred for the simultaneous inspection of assets and vegetation or for *access track maintenance*, report this expenditure under maintenance, not *vegetation management*.
- 11.2. For each of the *maintenance* subcategories prescribed in the template, add rows for additional subcategories if these are material and necessary to disaggregate financial Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 34 or non-financial data, for example, to disaggregate asset groups according to voltage levels or to specify inspection/ maintenance cycles.
- 11.3. For each *maintenance* subcategory, provide in separate columns the data for inspection cycles and maintenance cycles.
- 11.4. For the *inspection cycle* for each *maintenance* subcategory, express this as ‘n’ in the statement ‘every n years’. For example, if the inspection cycle is ‘every 6 years’, put ‘6’ in the inspection cycle column.
- 11.5. Similarly, for the *maintenance cycle* for each maintenance subcategory, express this as ‘n’ in the statement ‘every n years’. For example, if the maintenance cycle is ‘every 3 years’, put ‘3’ in the maintenance cycle column.
- 11.6. For inspection and maintenance cycles, asset quantity, and average age of the asset group, use the highest-value (i.e. highest replacement cost) asset type in the asset group as the basis.
- 11.7. Where there are multiple inspection and maintenance activities, report the cycle that reflects the highest cost activity.
- 11.8. Adding rows for additional *maintenance* subcategories to indicate inspection or maintenance cycles (i.e. non-financial data) does not require disaggregating the corresponding financial data for those additional subcategories.
- 11.9. For ‘Asset Quantity’, provide in separate columns:
 - a) the total number of assets (population) at the end of the regulatory year, for each asset category
 - b) the number of assets actually inspected or maintained during the regulatory year, for each asset category
- 11.10. For ‘Other maintenance activity’, add rows for *maintenance* expenditure subcategories if these are material and if these are not yet included in any other *maintenance* expenditure subcategory.

APPENDIX F: DEFINITIONS

Installed assets – quantity currently in commission by year

The number of assets currently in commission and the year they were installed.

Poles

These are vertically oriented assets that provide load bearing structural support for overhead conductors or other lines assets.

- This also includes associated pole top structures, such as cross-arms and insulators where these are replaced in conjunction with a pole replacement project.
- It excludes other pole mounted assets that are included in any other asset group, notably pole mounted substations and pole mounted switchgear such as links, fuses, air break switches etc.

Overhead conductors

These assets have the primary function of distributing power, above ground, within the distribution network. It excludes any pole mounted assets that are included in any other asset group.

Overhead asset inspection

All inspection of network overhead assets.

Includes all direct costs (labour, material, contract, motor vehicle); thermal survey programs.

Physical measure: Route km line patrolled by zone substation

Please provide a Response in this box:

For the year 2011 to 2013 inclusive the age profile data was obtained utilising a GIS (Geographical Information System) query that traces the in-service network connectivity model in GIS, to determine

1. The circuit line length, which includes all spurs. Each circuit element was evaluated in its own right, for example:
 - SWER lines, single-phase lines, and three-phase lines counted as one line
 - Double circuit lines counted as two lines
 - Overhead elements associated with communication, protection & control and unmetered loads were excluded
 - Overhead elements in the DNSP’s area that are owned by another Distribution Network Service Provider were excluded
2. The number of poles is consistent with the above line length evaluation process

For years 2009 to 2010 inclusive the age profile source data was not available and an estimate was used

This methodology meets the requirements of this Information Notice to the best of our abilities.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶¹ data green**; and **ESTIMATED⁶²/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

For CitiPower the Geographical Information System is the originating data source (i.e. from where the data is

⁶¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

obtained).

For the year 2012 the asset age profile data is the same data that was used to complete the 2012 AER Annual RIN Reports (Non-Financial), tab "3. Asset Installation".

For the year 2011 the asset age profile data is the same data that was used to complete the 2011 AER Annual RIN Reports (Non-Financial), tab "3. Asset Installation".

For the years 2009 to 2010 inclusive no source data was available. The 2009 to 2010 data was estimated using the 2011 data as the reference source

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>It is reasonable to assume that assets not subject to substantial replacement volumes from one year to the next exhibit an average age that changes by one unit (in this case one (1) year) from one annual reporting period to another. Hence, it is a reasonable estimate that the average asset age of such assets would most likely increase by one (1) year from that of the preceding year.</p> <p>As no source data was available the average asset ages were decremented by 2 years from that reported in 2011.</p>
2010	<p>It is reasonable to assume that assets not subject to substantial replacement volumes from one year to the next exhibit an average age that changes by one unit (in this case one (1) year) from one annual reporting period to another. Hence, it is a reasonable estimate that the average asset age of such assets would most likely increase by one (1) year from that of the preceding year.</p> <p>As no source data was available the average asset ages were decremented by 1 year from that reported in 2011.</p>
2011	As per 2013 but using the age profile data as provided in the 2011 AER Annual RIN Reports (Non-Financial), tab "3. Asset Installation"
2012	As per 2013 but using the age profile data as provided in the 2012 AER Annual RIN Reports (Non-Financial), tab "3. Asset Installation".
2013	<p>The age profiles were evaluated from the age profile data as provided in the 2013 AER Category RIN, Age Profiles.</p> <ul style="list-style-type: none"> The general equation used was $\text{Average Asset Age} = \frac{\sum_{n=1}^{n=N} (\text{Number of Asset per Class} \times \text{Class Age})}{\sum_{n=1}^{n=N} (\text{Total Number of Assets in the Class})}$ <p>Where n = the asset age</p> This methodology was applied to all the required asset descriptors

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	No source data was available
2010	No source data was available
2011	Year 2011 for CP complies with this Information Notice (see Response in section A)
2012	Year 2012 for CP complies with this Information Notice (see Response in section A)
2013	Year 2013 for CP complies with this Information Notice (see Response in section A)

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	It is reasonable to assume that assets not subject to substantial replacement volumes from one year to the next exhibit an average age that changes by one unit (in this case one (1) year) from one annual reporting period to another. Hence, it is a reasonable estimate that the average asset age of such assets would most likely increase by one (1) year from that of the preceding year.

2010	It is reasonable to assume that assets not subject to substantial replacement volumes from one year to the next exhibit an average age that changes by one unit (in this case one (1) year) from one annual reporting period to another. Hence, it is a reasonable estimate that the average asset age of such assets would most likely increase by one (1) year from that of the preceding year
2011	Year 2011 for CP complies with this Information Notice (see Response in section A)
2012	Year 2012 for CP complies with this Information Notice (see Response in section A)
2013	Year 2013 for CP complies with this Information Notice (see Response in section A)

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Assets that are not subject to substantial replacement volumes from one year to the next will usually exhibit an “average age” that alters by one unit (in this instance 1 year) from one annual reporting period to the next. Hence as no source data for 2009 is available decrementing the average asset age by two (2) years from the 2011 source data is a reasonable approach
2010	Assets that are not subject to substantial replacement volumes from one year to the next will usually exhibit an “average age” that alters by one unit (in this instance 1 year) from one annual reporting period to the next. Hence as no source data for 2010 is available decrementing the average asset age by one (1) year from the 2011 source data is a reasonable approach
2011	Year 2011 for CP complies with this Information Notice (see Response in section A)
2012	Year 2012 for CP complies with this Information Notice (see Response in section A)
2013	Year 2013 for CP complies with this Information Notice (see Response in section A)

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Data is provided for all the years requested

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.8 Maintenance	
Table name: 2.8.2 – COST METRICS FOR ROUTINE AND NON-ROUTINE MAINTENANCE	
Maintenance Activity	Maintenance Asset Category
NETWORK UNDERGROUND CABLE MAINTENANCE: BY VOLTAGE	(ALL data)
NETWORK UNDERGROUND CABLE MAINTENANCE: BY LOCATION	(ALL data)
DISTRIBUTION SUBSTATION EQUIPMENT & PROPERTY MAINTENANCE	(ALL data)
ZONE SUBSTATION EQUIPMENT MAINTENANCE	(ALL data)
ZONE SUBSTATION PROPERTY MAINTENANCE	(ALL data)
SCADA & NETWORK CONTROL MAINTENANCE	(ALL data)
PROTECTION SYSTEMS MAINTENANCE	(ALL data)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

11. MAINTENANCE EXPENDITURE

11.1 For expenditure incurred for the simultaneous inspection of assets and vegetation or for *access track maintenance*, report this expenditure under maintenance, not *vegetation management*.

11.2 For each of the *maintenance* subcategories prescribed in the template, add rows for additional subcategories if these are material and necessary to disaggregate financial Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 34 or non-financial data, for example, to disaggregate asset groups according to voltage levels or to specify inspection/ maintenance cycles.

11.3 For each *maintenance* subcategory, provide in separate columns the data for inspection cycles and maintenance cycles.

11.4 For the *inspection cycle* for each *maintenance* subcategory, express this as ‘n’ in the statement ‘every n years’. For example, if the inspection cycle is ‘every 6 years’, put ‘6’ in the inspection cycle column.

11.5 Similarly, for the *maintenance cycle* for each maintenance subcategory, express this as ‘n’ in the statement ‘every n years’. For example, if the maintenance cycle is ‘every 3 years’, put ‘3’ in the maintenance cycle column.

11.6 For inspection and maintenance cycles, asset quantity, and average age of the asset group, use the highest-value (i.e. highest replacement cost) asset type in the asset group as the basis.

11.7 Where there are multiple inspection and maintenance activities, report the cycle that reflects the highest cost activity.

11.8 Adding rows for additional *maintenance* subcategories to indicate inspection or maintenance cycles (i.e. non-financial data) does not require disaggregating the corresponding financial data for those additional subcategories.

11.9 For ‘Asset Quantity’, provide in separate columns:

(a) the total number of assets (population) at the end of the regulatory year, for each asset category

(b) the number of assets actually inspected or maintained during the regulatory year, for each asset category

11.10 For ‘Other maintenance activity’, add rows for *maintenance* expenditure subcategories if these are material and if these are not yet included in any other *maintenance* expenditure subcategory.

Distribution substation A *substation* on a distribution *network* that transforms *voltage* of levels at or below 33 kV but above 1 kV to levels below 1 kV.

As a guide, assets included within a *distribution substation* include all equipment permanently installed within the *distribution substation* boundary. Where applicable (such as indoor and outdoor *substations*), this includes any enclosures, structures, *civil works*, poles and associated hardware, cabling and other assets that are located permanently within the *distribution substation* boundary, but excludes any incoming or outgoing *lines* or *cables*. For the avoidance of doubt this does not include any building, structure, equipment, cabling, etc. located within the *substation* boundary that is the property or responsibility of third parties. Where applicable (such as for pole mounted *substations*), this also includes any poles, pole hardware, pole structures, links, surge diverters, fuses or protective devices, cabling and other assets forming part of the *substation* or its supports, but excluding incoming or outgoing

overhead mains, cables and associated cable terminations (cables in this context includes all power, communications and control cables).

Distribution substation equipment & property maintenance

Maintenance of distribution substations, equipment to convert HV distribution to LV, current transformers, voltage transformers, voltage regulators and associated secondary protection and communication equipment. Equipment maintenance – includes all direct costs (labour, material, contract, motor vehicle); maintenance of distribution switchgear; inspecting, testing and maintaining distribution substations primary and secondary equipment, apparatus and hardware; transformers, earthing, surge diverters, isolators, protection and communication directly associated with the substation; inspecting, testing and maintaining substations and protective apparatus, equipment and hardware; earthing, surge diverters, EDOs and isolators directly associated with the substation; maintenance of site including buildings, fences and cleaning; carrying out replacement of HV fuses not occasioned by fault or emergency work (minor value of replacement, e.g. <\$500). Property maintenance – includes all direct costs (labour, material, contract, motor vehicle); maintenance of site including buildings, fences and cleaning; weed control. Excludes upgrades and replacements of equipment which should be capex. Physical measure: Number of projects completed by distribution substation; Number of substations and voltage regulators maintained by zone substation; Number of distribution substation properties maintained

Distribution substation transformers maintenance

A subset of Distribution Substation Equipment & Property Maintenance. Maintenance of all transformers in distribution substations and associated secondary protection and communication equipment. Includes all direct costs (labour, material, contract, motor vehicle); maintenance of HV to LV transformers; inspecting, testing and maintaining transformer equipment, apparatus and hardware; protection and communication directly associated with the distribution substation. Excludes upgrades and replacements of transformers (capex); maintenance of distribution substation equipment other than transformers under Distribution Substation Equipment & Property Maintenance. Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 50 Physical measure: Number of installed transformers by distribution substation

Distribution switchgear maintenance

Maintenance of distribution network switches. Includes all direct costs (labour, material, contract, motor vehicle); distribution air break switches; distribution metal clad switchgear; distribution auto-reclosers; pole mounted and ground mounted switchgear; HV and LV switchgear Physical measure: Number of switches maintained by zone substation.

Inspection cycle The planned or actual duration between two consecutive inspections of an asset

Maintenance Operational repairs and maintenance of the distribution system including high voltage and low voltage assets, and including testing, investigation, validation and correction costs not involving capital expenditure. This also includes location of underground cables and covering of low voltage mains for safety reasons. Includes the maintenance of public lighting, as well as scheduled maintenance, meter investigations, special readings and photovoltaic (PV) installations Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 55 For AMI services, includes the maintenance of meters and time switches

Maintenance cycle

The planned or actual duration between two consecutive maintenance works on an asset

Network underground cable maintenance

Inspection, testing and maintenance of underground HV distribution and LV cable installations and terminations. Includes all direct costs (labour, material, contract, motor vehicle); power, supervisory and protection cable maintenance and ancillaries such as conduits, tunnels, manholes, cover slabs, sumps and terminations; cable location inquiries; cable maintenance for all voltages; total lengths of distribution feeder cables emanating from a zone substation. Excludes underground service cable maintenance (see Pole Top, Overhead Line and Services Maintenance); all cables and major replacements inside a zone substation except feeder cables; cable repairs made as part of an emergency or fault restoration and repair of damage caused by other parties. Physical measure: Length of cables maintained by zone substation; Number of joints.

Non-routine maintenance Costs (opex) of activities predominantly directed at managing asset condition or rectifying Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 61 defects (excluding emergency call-outs). The timing of these activities depends on asset condition and decisions on when to maintain or replace the asset, which may vary over time and across NSPs. Activities to maintain asset condition and/or to maintain the capacity of the distribution system to distribute electricity, and where the activities are not routine in nature.

The non-routine activities may be undertaken in a discriminate manner for individual assets.

Excludes routine asset maintenance activities.

Excludes activities that are designed to increase or improve the capacity of the distribution system to distribute electricity, except where the increase or improvement is incidental to the maintenance of the distribution system.

Excludes asset removal, asset replacement, new asset installation, vegetation management, and emergency response.

May include:

- activities to inspect, survey, audit, test, repair, alter, or reconfigure assets
- functional and intrusive testing of assets, including spares and equipment;

Includes load monitoring and switching activities attributable to non-routine asset maintenance.

Opex The costs of operating and maintaining the network (excluding all capital costs and capital construction costs).
Operating expenditure

Routine maintenance Costs (opex) of recurrent/programmed activities undertaken to maintain assets, performed regardless of the condition of the asset. Costs of activities predominantly directed at discovering information on asset condition, and often undertaken at intervals that can be predicted.

Activities to maintain asset condition and/or to maintain the capacity of the distribution system to distribute electricity, and where the activities are:

- routine in nature; and
- indiscriminately carried out for a pre-defined set of assets; and
- scheduled to occur at pre-defined intervals.

May include activities to inspect, survey, audit, test, repair, alter, or reconfigure assets.

A pre-defined interval may be based on the number of times the asset has operated, or any other measure, if the future timing of the maintenance based on the measure can be predicted with a reasonable level of certainty.

Excludes activities that are designed to increase or improve the capacity of the distribution system to distribute electricity, except where the increase or improvement is incidental to the maintenance of the distribution system.

Excludes asset removal, asset replacement, new asset installation, vegetation management, and emergency response.

May include:

- functional and intrusive testing of assets, including spares and equipment;
 - helicopter, vehicle, and foot patrols, including negotiation of landowner access;
 - asset surveys;
 - environmental testing;
 - painting of network assets;
 - re-conductoring lines
 - indoor and outdoor maintenance of substations including lawn mowing, weed control, fencing;
- Includes load monitoring and switching activities attributable to routine asset maintenance.

SCADA Supervisory control and data acquisition

SCADA and Network Control maintenance (opex)

Expenditure associated with the maintenance of SCADA and network control hardware, software and associated IT and communications systems.

Excludes maintenance of Protection Systems, which is a separate subcategory in template 2.7

Maintenance.

Also refer to *SCADA and Network Control Expenditure* definition (capex).

Zone substation A substation on a distribution network that transforms any voltage above 33 kV to levels at or below 33 kV but above 1 kV.

As a guide, assets included within a zone substation include all equipment, buildings, structures, civil works and other assets that are located permanently within the substation boundary fence; but excluding the landing spans of incoming or outgoing overhead lines, and excluding incoming or outgoing cables and associated cable terminations (cables includes all power, communications and control cables).

Zone substation equipment maintenance

Maintenance of zone substations, equipment to convert sub transmission voltage to distribution voltage, current transformers, voltage transformers and associated secondary protection and communication equipment.

Includes all direct costs (labour, material, contract, motor vehicle); maintenance of sub transmission switchgear; inspecting, testing and maintaining zone substations primary and secondary equipment, apparatus and hardware; transformers, earthing, surge diverters, isolators, protection and communication directly associated with the substation.

Includes maintenance of distribution equipment within the zone substation.

Excludes upgrades and replacements which should be capex; Zone Substation Property Maintenance.

Physical measure: Number of zone substation assets, e.g. number of transformers

Zone substation property maintenance

Includes all direct costs (labour, material, contract, motor vehicle); maintenance of site including buildings, fences and cleaning; weed control.

Excludes Zone Substation Equipment Maintenance and Zone Substation Transformer Maintenance

Physical measure: Number of zone substation properties maintained

Zone substation transformers maintenance

A subset of Zone Substation Equipment Maintenance. Maintenance of all transformers in zone substations and associated secondary protection and communication equipment.

Includes all direct costs (labour, material, contract, motor vehicle); maintenance of HV to LV transformers; inspecting, testing and maintaining transformer equipment, apparatus and hardware; protection and communication directly associated with the zone substation.

Excludes upgrades and replacements of transformers which should be capex; maintenance of zone substation equipment other than transformers under Zone Substation Equipment Maintenance.

Physical measure: Number of installed voltage transformers by zone substation

Please provide a Response in this box:

The requirements of section 11 of the notice have been complied with.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶³ data green**; and **ESTIMATED⁶⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

ROUTINE & NON-ROUTINE MAINTENANCE COSTS

1. Top level Summary Function Code information was sourced from the regulatory reporting accounts.
2. A list of projects was obtained from SAP Business Intelligence (BI) reports.
3. Plant Maintenance (PM) Orders were extracted from SAP.
4. Functional location details were extracted from SAP.
5. Equipment details were extracted from SAP.

Note that the data sources 1. and 2. do not balance due to differing general ledger accounts being applied to the regulatory accounts and the CitiPower internal direct OPEX reports. The BI extractions are used as a % proxy of the Regulatory Reporting totals as the regulatory totals are at the summary function code level only and do not provide sufficient data to allow mapping of expenditure to the AER RIN categories and classes. The costs provided by the BI reports against individual projects/orders are converted to a percentage of the function code total for the given year. At the conclusion of the cost allocation algorithm these percentages are then multiplied by the regulatory account totals to determine the actual expenditure.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

⁶³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>ROUTINE & NON-ROUTINE MAINTENANCE COSTS</p> <p>The purpose of this methodology is to describe the process undertaken to allocate maintenance expenditure from CitiPower data structures into the data structures required by the AER.</p> <p>SAP Maintenance PM Orders were categorised and mapped into the AER CAT RIN categories. Maintenance attendances were counted based on the PMOrder counts.</p> <p>The BI financials associated with the PM Orders were used as a proportionality proxy of the regulatory reporting totals. This resulted in the summation of PMOrder costs into the AER CAT RIN totals.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>Estimation is required in this instance:</p> <p>ROUTINE & NON-ROUTINE MAINTENANCE COSTS</p> <ul style="list-style-type: none"> In order to bridge the differences in definitions between CitiPower / Powercor Function Code accounts, the Regulatory Category Asset Classes, and the new AER CAT RIN classes which do not result in direct mapping. <ul style="list-style-type: none"> CitiPower / Powercor function code definitions, for function codes 316, 317, 318, 319, 350, 442 & 492 are broader than the Category Asset Classes and, in some cases, the Category Asset Groups. For expenditure to be allocated to an Asset Class definition gap must be bridged.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Estimation is based on:</p> <p>ROUTINE & NON-ROUTINE MAINTENANCE COSTS</p> <ul style="list-style-type: none"> The manual allocation of an AER category to each cost incurring PMOrder. This allocation is based on the PMOrder linking to equipment and / or functional location in order to be mapped. PMOrders which were not linked were ignored in the allocation exercise. PMOrder type being the most accurate representation of routine / non-routine maintenance. From the categorisation the % allocation of expenditure to each Category Asset Class can be determined and multiplied by the total regulatory spend in each year. This provides a cost breakdown to the Category Asset Class level but is an estimation based on the data mapping exercise. The AER requested underground cable data to be presented via two different methods. The CBD non-CBD split is not undertaken in this process. Powercor does not have a CBD network. CitiPower it was assumed that All 33 kV and above expenditure was CBD and all other was not.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	<p>This method was selected as:</p> <p>ROUTINE & NON-ROUTINE MAINTENANCE COSTS</p> <ul style="list-style-type: none"> It provided a more accurate result than a percentage split of function codes based on unfounded estimation and was based on allocation from reduced but categorised data.

2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.8 Maintenance	
Table name: 2.8.2 - COST METRICS FOR ROUTINE AND NON-ROUTINE MAINTENANCE	
Asset Group	Maintenance Asset Category
Public Lighting Maintenance	Minor Roads
Public Lighting Maintenance	Major Roads

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

11. MAINTENANCE EXPENDITURE

11.1 For expenditure incurred for the simultaneous inspection of assets and vegetation or for access track maintenance, report this expenditure under maintenance, not vegetation management.

11.2 For each of the maintenance subcategories prescribed in the template, add rows for additional subcategories if these are material and necessary to disaggregate financial Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 34

or non-financial data, for example, to disaggregate asset groups according to voltage levels or to specify inspection/maintenance cycles.

11.3 For each maintenance subcategory, provide in separate columns the data for inspection cycles and maintenance cycles.

11.4 For the inspection cycle for each maintenance subcategory, express this as ‘n’ in the statement ‘every n years’. For example, if the inspection cycle is ‘every 6 years’, put ‘6’ in the inspection cycle column.

11.5 Similarly, for the maintenance cycle for each maintenance subcategory, express this as ‘n’ in the statement ‘every n years’. For example, if the maintenance cycle is ‘every 3 years’, put ‘3’ in the maintenance cycle column.

11.6 For inspection and maintenance cycles, asset quantity, and average age of the asset group, use the highest-value (i.e. highest replacement cost) asset type in the asset group as the basis.

11.7 Where there are multiple inspection and maintenance activities, report the cycle that reflects the highest cost activity.

11.8 Adding rows for additional maintenance subcategories to indicate inspection or maintenance cycles (i.e. non-financial data) does not require disaggregating the corresponding financial data for those additional subcategories.

11.9 For ‘Asset Quantity’, provide in separate columns:

(a) the total number of assets (population) at the end of the regulatory year, for each asset category

(b) the number of assets actually inspected or maintained during the regulatory year, for each asset category

11.10 For ‘Other maintenance activity’, add rows for maintenance expenditure subcategories if these are material and if these are not yet included in any other maintenance expenditure subcategory.

Definitions

Opex Category: Means operating expenditure associated with the following categories:

- Non-network expenditures
- Vegetation management
- Maintenance
- Emergency response
- Network Overheads and Corporate Overheads

Maintenance: Operational repairs and maintenance of the distribution system including high voltage and low voltage assets, and including testing, investigation, validation and correction costs not involving capital expenditure. This

also includes location of underground cables and covering of low voltage mains for safety reasons. Includes the maintenance of public lighting, as well as scheduled maintenance, meter investigations, special readings and photovoltaic (PV) installations Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 55 For AMI services, includes the maintenance of meters and time switches

Public lighting maintenance: Expenditure associated with the maintenance, repair or inspection of public lighting assets on major roads and minor roads Includes all direct costs (labour, material, contract, motor vehicle) Physical Measure: Number of public lights serviced by zone substation; Number of kilometres patrolled by zone substation.

Light maintenance: The operating cost associated with the repair and inspection of the following public lighting assets on a major or minor road:

- Luminaires
- Brackets
- Lamps
- Poles dedicated to public lighting services; and
- Underground or overhead cabling dedicated to public lighting services.

Light maintenance should include the operational repairs and inspection of the public lighting assets, not including capital expenditure.

Routine maintenance: Costs (opex) of recurrent/programmed activities undertaken to maintain assets, performed regardless of the condition of the asset. Costs of activities predominantly directed at discovering information on asset condition, and often undertaken at intervals that can be predicted.

Activities to maintain asset condition and/or to maintain the capacity of the distribution system to distribute electricity, and where the activities are:

- routine in nature; and
- indiscriminately carried out for a pre-defined set of assets; and
- scheduled to occur at pre-defined intervals.

May include activities to inspect, survey, audit, test, repair, alter, or reconfigure assets. A pre-defined interval may be based on the number of times the asset has operated, or any other measure, if the future timing of the maintenance based on the measure can be predicted with a reasonable level of certainty.

Excludes activities that are designed to increase or improve the capacity of the distribution system to distribute electricity, except where the increase or improvement is incidental to the Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 67 maintenance of the distribution system.

Excludes asset removal, asset replacement, new asset installation, vegetation management, and emergency response.

May include:

- functional and intrusive testing of assets, including spares and equipment;
- helicopter, vehicle, and foot patrols, including negotiation of landowner access;
- asset surveys;
- environmental testing;
- painting of network assets;
- re-conductoring lines
- indoor and outdoor maintenance of substations including lawn mowing, weed control, fencing;

Includes load monitoring and switching activities attributable to routine asset maintenance.

Non-routine maintenance: Costs (opex) of activities predominantly directed at managing asset condition or rectifying Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 61 defects (excluding emergency call-outs). The timing of these activities depends on asset condition and decisions on when to maintain or replace the asset, which may vary over time and across NSPs.

Activities to maintain asset condition and/or to maintain the capacity of the distribution system to distribute electricity, and where the activities are not routine in nature. The non-routine activities may be undertaken in a discriminate manner for individual assets. Excludes routine asset maintenance activities. Excludes activities that are designed to increase or improve the capacity of the distribution system to distribute electricity, except where the increase or improvement is incidental to the maintenance of the distribution system.

Excludes asset removal, asset replacement, new asset installation, vegetation management, and emergency response.

May include:

- activities to inspect, survey, audit, test, repair, alter, or reconfigure assets
- functional and intrusive testing of assets, including spares and equipment;

Includes load monitoring and switching activities attributable to non-routine asset maintenance. Normal cyclic rating The maximum peak loading based on a given daily load cycle that an asset or element of the network can supply

each day of its life under normal conditions resulting in a normal rate of wear. CitiPower must provide its definition(s) of 'normal conditions'.

Maintenance cycle: The planned or actual duration between two consecutive maintenance works on an asset

Inspection cycle: The planned or actual duration between two consecutive inspections of an asset

Major road: Roads on which the visual requirements of motorists are dominant (e.g. traffic routes). Typically the responsibility of a state or territory road authority.

Minor road: Roads on which the visual requirements of pedestrians are dominant (e.g. local roads and lighting that is applicable to areas other than roads outdoor public areas, e.g. outdoor shopping). Typically the responsibility of a local Government authority.

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 2.2.1 Cost Metrics by asset category for Public Lighting. We have provided data that complies with the instructions and definitions specified in the requirements as follows:

11 Maintenance Expenditure

11.1 expenditure for simultaneous inspection has been allocated to maintenance asset category.

11.2 not applicable

11.3 not applicable

11.4 not applicable

11.5 not applicable

11.6 not applicable

11.7 not applicable

11.8 not applicable

11.9 (a) not applicable

(b) not applicable

11.10 not applicable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶⁵ data green**; and **ESTIMATED⁶⁶/derived data red**

ROUTINE MAINTENANCE COST

2009	2010	2011	2012	2013
------	------	------	------	------

NON-ROUTINE MAINTENANCE COST

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

⁶⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

ROUTINE MAINTENANCE COST (\$000'S)

- The source data is based on total lights extracted from GIS of all cost shared lights.
- Finance costs have been extracted out of SAP Finance for public lighting routine maintenance

NON-ROUTINE MAINTENANCE COST (\$000'S)

- The source data is based on total faults extracted from Public Light Fault Management System (PLFMS) listing all non-routine maintenance activities.
- Finance costs have been extracted out of SAP Finance for public lighting non-routine maintenance

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>ROUTINE MAINTENANCE COST (\$000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> • Per definition, routine maintenance is all activities undertaken to maintain assets, performed regardless of the condition of the asset at the end of the regulatory year have been provided • Per definition, for major roads & minor roads, assets were allocated to these sub-categories based on cost sharing status. • Costs were allocated based on the total cost of routine maintenance multiplied by the percentage of minor roads assets. • Costs were allocated based on the total cost of routine maintenance multiplied by the percentage of major roads assets for 2009-2010. Only asset inspection costs were allocated for the remaining regulatory years 2011-2013 as bulk change program was not conducted for major road lights. <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> • Assumption that all lights 'full cost (municipality)' are reported as 'minor roads' • Assumption that all lights 'cost shared (municipality/state road authority) are reported as 'major roads' <p>NON-ROUTINE MAINTENANCE COST (\$000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> • Per definition, non-routine maintenance is all activities undertaken to manage asset condition or rectifying defects (excluding emergency call-outs), and excludes routine asset maintenance activities at the end of the regulatory year have been provided • Per definition, for major roads & minor roads, assets were allocated to these sub-categories based on cost sharing status. • Costs were allocated based on the total cost of non-routine maintenance multiplied by the percentage of major road and minor roads non-routine maintenance activities. <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> • Assumption that all lights 'full cost (municipality)' are reported as 'minor roads' • Assumption that all lights 'cost shared (municipality/state road authority) are reported as 'major roads'
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>ROUTINE MAINTENANCE COST (\$000'S)</p> <ul style="list-style-type: none"> • Business does not currently record individual public light routine maintenance programs which made it impossible to determine exact numbers of lamp replacements in a given year. Cost allocation is against the total routine maintenance activity rather than sub-categories. <p>NON-ROUTINE MAINTENANCE COST (\$000'S)</p> <ul style="list-style-type: none"> • Business does currently record individual public light non-routine maintenance activities, however

	the cost allocation is against the total asset category rather than sub-categories.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>ROUTINE MAINTENANCE COST (\$000'S)</p> <p>Approach used:</p> <ul style="list-style-type: none"> • Details available in systems available did not provide any conclusive evidence regarding the number of assets maintained/inspected. Current maintenance cycles are based on municipal boundaries and not physical luminaires. • No allowance has been made for pole inspections where a visual inspection is performed. • No allowance has been made for patrols required as part of the Public Lighting Code for arterial roads. • Business does not currently record individual public light routine maintenance programs which made it impossible to determine exact numbers of lamp replacements in a given year. Cost allocation is against the total routine maintenance activity rather than sub-categories. <p>Options considered:</p> <ul style="list-style-type: none"> • Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. • Volumes were not available for routine maintenance <p>Assumptions made:</p> <ul style="list-style-type: none"> • The definition as per the RIN required that all roads managed by state road authorities be classified as 'major roads', roads managed by municipal councils classified as 'minor roads.' • Allocation to major road / minor road was not retained historically. Allocation was completed using cost sharing,(full cost & cost shared) as the best fit to the RIN definition. <p>NON-ROUTINE MAINTENANCE COST (\$000'S)</p> <p>Approach used:</p> <ul style="list-style-type: none"> • Details available in systems available provided sufficient detail regarding the number of assets maintained as part of non-routine maintenance activities. However cost allocation was not available on an individual asset basis <p>Options considered:</p> <ul style="list-style-type: none"> • Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. • Limited volumes were available for non-routine maintenance <p>Assumptions made:</p> <ul style="list-style-type: none"> • The definition as per the RIN required that all roads managed by state road authorities be classified as 'major roads', roads managed by municipal councils classified as 'minor roads.' • Business retains some information of non-routine maintenance by asset categories and this was used where available. • Allocation to major road / minor road was not retained historically. Allocation was completed using cost sharing,(full cost & cost shared) as the best fit to the RIN definition.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other reliable data is available for the period required.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

ROUTINE MAINTENANCE COST

2009	2010	2011	2012	2013
------	------	------	------	------

NON-ROUTINE MAINTENANCE COST

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.8 Maintenance	
Table name: 2.8.2 - COST METRICS FOR ROUTINE AND NON-ROUTINE MAINTENANCE	
MAINTENANCE ACTIVITY	MAINTENANCE ASSET CATEGORY
OTHER	EMERGENCY FAULTS - OVERHEAD EMERGENCY FAULTS - UNDERGROUND EMERGENCY FAULTS - METERS EMERGENCY FAULTS - PROTECTION AND CONTROL ROADS MGT BILL VOLTAGE COMPLAINTS TVI INVESTIGATIONS POLE DEFECT MANAGEMENT INSULATOR WASHING ENVIRONMENT MANAGEMENT UG CABLE LOCATIONS QUALITY AUDITS QUALITY INVESTIGATIONS NETWORK LOGGING MONITORING RESEARCH AND DEVELOPMENT ESV REPORTING MISCELLANEOUS MAINTENANCE NETWORK ASSET RETIREMENT ASSET RETIREMENT

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

11. MAINTENANCE EXPENDITURE

11.10 For ‘Other maintenance activity’, add rows for *maintenance* expenditure subcategories if these are material and if these are not yet included in any other *maintenance* expenditure subcategory.

Please provide a Response in this box:

All ‘other maintenance activity’ not included in the specific asset related *maintenance* subcategories have been identified and an appropriate row has been added describing the maintenance activity undertaken.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶⁷ data green**; and **ESTIMATED⁶⁸/derived data red**

⁶⁷ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Financial data obtained from a report from SAP.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>The costs for the 'other maintenance activities' as described in clause 11.10 of the RIN were obtained directly from the Electricity Networks Business Unit Function Code Expenditure for that year. All other Maintenance category Function Codes were used to populate the AER nominated maintenance activities in Table 2.8.2. The items in red font, are routine maintenance costs, the remaining Function Code costs are non-routine maintenance costs.</p> <p>Each item has the following Function Code (FC):</p> <ul style="list-style-type: none"> • FC310 EMERGENCY FAULTS - UNDERGROUND • FC311 EMERGENCY FAULTS - METERS • FC312 EMERGENCY FAULTS - PROTECTION AND CONTROL • FC325 ROADS MGT BILL • FC335 VOLTAGE COMPLAINTS • FC336 TVI INVESTIGATIONS • FC381 POLE DEFECT MANAGEMENT • FC410 INSULATOR WASHING • FC425 ENVIRONMENT MANAGEMENT • FC440 UG CABLE LOCATIONS • FC482 QUALITY AUDITS • FC485 NETWORK LOGGING MONITORING • FC486 RESEARCH AND DEVELOPMENT • FC488 ESV REPORTING • FC800 MISCELLANEOUS MAINTENANCE • FC991 NETWORK ASSET RETIREMENT • A991 ASSET RETIREMENT
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable

⁶⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

2.9 Emergency

AER CATEGORY ANALYSIS RIN

Tab name: 2.9 Emergency Response	
Table name: 2.9.1 - EMERGENCY RESPONSE EXPENDITURE (OPEX)	
(A) TOTAL EMERGENCY RESPONSE EXPENDITURE (\$000'S)	(ALL)
(B) MAJOR EVENTS O&M EXPENDITURE (\$000'S)	(ALL)
(C) MAJOR EVENT DAYS O&M EXPENDITURE (\$000'S)	(ALL)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

13. EMERGENCY RESPONSE EXPENDITURE

13.1 Report the following expenditure for each regulatory year:

- (a) total emergency response expenditure
- (b) emergency response expenditure attributable to major events by identifying direct costs through a specific cost code for each major event or major storm. Major events most often refer to, but are not limited to, a major storm.
- (c) emergency response expenditure attributable to major event days by identifying daily operating expenditure incurred on each date of those major event days and summing up the expenditure for each event.

Emergency response

Costs incurred to restore a failed component to an operational state including all expenditure relating to the work incurred where supply has been interrupted or assets damaged or rendered unsafe by a breakdown, making immediate operations and/or repairs necessary.

Costs of activities primarily directed at maintaining network functionality and for which immediate rectification is necessary. These activities are primarily due to network failure caused by weather

Please provide a Response in this box:

13.1 expenditure for each regulatory year:

(a) total emergency response expenditure

All operating expenditure directly associated with the emergency response to failed Subtransmission, High Voltage and Low Voltage components has been provided for each regulatory year. These works comprise the response to restore the network to its operational state, and include:

- all such emergency work to respond, rectify or make safe
- all switching associated with the emergency including work preparation and restoration of supply
- attendance to:
 - loss of supply to customers
 - electrical accidents
 - shocks or facilities fires
 - high voltage injection
- emergency response operating costs for major events.

(b) emergency response expenditure attributable to major events by identifying direct costs through a specific cost code for each major event or major storm. Major events most often refer to, but are not limited to, a major storm.

The costs for emergency response to Major events such as storm and extreme weather event costs are captured using blanket Orders created for each specific event. A major event will be made up of a large number of individual faults that are directly attributable to the event. A blanket order captures the costs for each individual fault to give the total cost for the major event.

(c) emergency response expenditure attributable to major event days by identifying daily operating expenditure incurred on each date of those major event days and summing up the expenditure for each event:

The costs for each date of a major event are not separated by their date, but are captured in the “blanket” order as described in (b) above. All operating costs associated with each event are captured.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶⁹ data green**; and **ESTIMATED⁷⁰/derived data red**

Section c)

2009	2010	2011	2012	2013
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Section a)

2009	2010	2011	2012	2013
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Section b)

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The Total Emergency Response Expenditure for each year is provided by Regulatory Accounting group from data obtained from SAP.

Major Event Days (MEDs) are provided by the Reliability group from their determination of days that met the MED threshold as set by the AER for the corresponding years. Data is then obtained from:

- o Outage Management System (via Business Intelligence reporting system) used to review fault data for MED days – OM0015 Order Details report, OM0016 Order Details Generic report and SAP transaction ZI49 provide fault orders.
- o SAP transaction KSB1 and KOB1 provide cost for these events.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

⁶⁹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁷⁰ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

Year	Methodology & Assumptions
2009	<p>Table 2.9.1 – Emergency Response Expenditure</p> <p>(A) Total Expenditure: The data in table 2.9.1 represents actual figures captured in the SAP system but are not referenced to individual fault cases through the Outage Management System (OMS). This data is inclusive of all emergency works including Major Event Days.</p> <p>(B) Major Storm Based on the AER's definition of a Major Storm (AER Requirement Document, Appendix F Definitions, Major Storm – "Tropical cyclone Category 1 or above as classified by Australian Bureau of Meteorology", there have been no Major Storm events in CitiPower during the period of reporting.</p> <p>(C) Major Event Days Using the 2010 AER threshold for Major Event Days, there were 3 days identified as MED days in CitiPower in 2009. The CitiPower systems at the time provided no reference between SAP and individual fault cases in the OMS system and therefore no cost data is available for these days. An estimate of the MED costs for 2009 has been provided.</p>
2010	<p>Table 2.9.1 – Emergency Response Expenditure</p> <p>(A) Total Expenditure: Same as 2009</p> <p>(B) Major Storm Same as 2009</p> <p>(C) Major Event Days The data in table 2.9.1 represents actual figures captured in the SAP system and referenced to individual fault cases through the Outage Management System (OMS) for Major Event Days only. The data includes all fault costs for that day, plus any fault orders related to the event that span over the whole major event. Major Event Days include:</p> <ul style="list-style-type: none"> o All causes – including severe weather events and normal faults. o A severe weather event could last for more than a day. The cost includes the operational cost of the entire event.
2011	Table 2.9.1 - same as 2010
2012	Table 2.9.1 - same as 2010
2013	Table 2.9.1 - same as 2010

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Using the 2010 AER threshold for Major Event Days, three days are identified as MED days in CitiPower in 2009. However the CitiPower systems at the time provided no reference to individual fault cases in the OMS system and therefore no actual cost data is available for these days.
2010	An estimate was required due to a minor discrepancy between the Regulation Accounting group data and the Fault and Emergency Historical data. It was not possible to use actual data since the MED historical data could not be matched equally to finance figures.
2011	Same as 2010
2012	Same as 2010
2013	Same as 2010

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The costs applied for 2009 MED is 83% of the costs for 2012 MED (i.e. 2009 MED SAIDI of 6.7 is 83% of the 2012 MED SAIDI 8.1)
2010	Historical data for MED was proportioned to total Fault and Emergency historical data. This proportion was then allocated pro rata to the Regulation Accounting group information obtained from finance. RIN MED Cost = MED cost (historical data) x total Fault and Emergency figure from Regulation Accounting group / total Fault and Emergency historical figure.

2011	Same as 2010
2012	Same as 2010
2013	Same as 2010

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The MED SAIDI figure for 2009 is 6.7, and when compared with subsequent years the MED SAIDI figure for 2012 of 8.1 is the closest comparison (2010 SAIDI 17.9, 2011 SAIDI 10.4, 2013 SAIDI 58.4).
2010	This approach was the best estimate given it was simple and effective in reconciling the minor discrepancy between the figures.
2011	Same as 2010
2012	Same as 2010
2013	Same as 2010

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No data has been provided for section b) as based on the AER's definition of a Major Storm (AER Requirement Document, Appendix F Definitions, Major Storm – "Tropical cyclone Category 1 or above as classified by Australian Bureau of Meteorology", there have been no Major Storm events in Powercor during the period of reporting.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

2.10 Overheads

AER CATEGORY ANALYSIS RIN

Tab name: 2.10 Overheads	
Table name 2.10.1 - NETWORK OVERHEADS EXPENDITURE	
NETWORK OVERHEADS	All actual data. Includes basis for items: OTHER FLEET & PROPERTY OVERHEAD PNS OVERHEAD LEVIES GSL PAYMENTS ADVERTISING

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

14. OVERHEADS EXPENDITURE

14.1 Report overhead expenditure before it is allocated to services or direct expenditure, and before any part of it is capitalised.

14.2 CitiPower must disaggregate network operating costs into the following six subcategories:

- (a) network management
- (b) network planning
- (c) network control and operational switching personnel
- (d) quality and standard functions
- (e) project governance and related functions
- (f) other.

14.3 For the avoidance of doubt, the following expenditures must be provided in regulatory template 2.10:

(a) Table 2.10.1 Network Overhead – If CitiPower has previously reported network operating costs in its Regulatory Accounting Statements, CitiPower must report these under network overhead in regulatory template 2.10.1:

- (i) network management
- (ii) network planning
- (iii) network control and operational switching
- (iv) quality and standard functions (including standards and manuals, compliance, quality of supply, reliability, network records (GIS), and asset strategy (other than network planning)
- (v) project governance and related functions (including supervision, procurement, works management, logistics and stores) Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 38
- (vi) other (including training, OH&S functions, network billing, and customer service).

The six subcategories above are mandatory subcategories in network overhead.

(b) Table 2.10.1 Network Overhead – For other network operating costs that CitiPower previously reported in its Regulatory Accounting Statements and are not included in the six mandatory subcategories above, CitiPower must report these under network overhead in regulatory template 2.10.1. These expenditures include, but are not limited to:

- (i) meter reading
- (ii) advertising/marketing
- (iii) Guaranteed Service Level (GSL) payments
- (iv) National Energy Customer Framework (NECF)-related expenses

- (v) feed-in tariffs
- (vi) demand management expenditure
- (vii) levies

(c) Table 2.10.2 Corporate Overhead – For corporate overhead expenditure that CitiPower previously reported in its Regulatory Accounting Statements and are not included in any other overhead subcategory, CitiPower must report these under corporate overhead in regulatory template 2.10.2. These expenditures include, but are not limited to:

- (i) office of the CEO
- (ii) legal and secretariat
- (iii) human resources
- (iv) finance
- (v) regulatory
- (vi) insurance
- (vii) self-insurance
- (viii) debt raising costs
- (ix) equity raising costs
- (x) non-network IT support.

14.4 If there is any overhead expenditure that is capitalised:

- (a) explain, in the Basis of Preparation, why it is capitalised
- (b) if there is a material change in reported expenditures in the Initial Regulatory Years or in Subsequent Regulatory Years due to a change in capitalisation policy, identify the expenditure categories and quantum of capex and opex that are affected and explain this in the Basis of Preparation.

Please provide a Response in this box:

Network Overheads have been reported consistent with the cost allocation methodology, Regulatory Financial Statements and opex categories in place at the time for those regulatory years, with the exception of the 2011 and 2012 years.

CitiPower's approved CAM for 2011 and 2012 was inconsistent with the AER's final distribution determination 2011-15 service classification. In December 2013 the AER approved an amended CAM which is consistent with the AER's final distribution determination 2011-15 service classification. For the purposes of this RIN, CitiPower has deemed that the 2011 and 2012 Regulatory Accounting Statements restated to be consistent with the approved amended CAM are the relevant Regulatory Accounting Statements. On this basis, opex has been reported consistent with the cost allocation methodologies, Regulatory Financial Statements and opex categories that applied in the relevant year.

Network overheads have been reported before allocation to services or direct expenditure, and before any part of it is capitalised.

CitiPower has restated its network operating costs and applicable network management overheads in accordance with the following categorisation as defined by the AER:

- (i) network management
- (ii) network planning
- (iii) network control and operational switching
- (iv) quality and standard functions (including standards and manuals, compliance, quality of supply, reliability, network records (GIS), and asset strategy (other than network planning)
- (v) project governance and related functions (including supervision, procurement, works management, logistics and stores) Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 38
- (vi) other (including training, OH&S functions, network billing, and customer service).

The six subcategories above are mandatory subcategories in network overhead.

'Other' includes network billing and customer service.

The business has not reported meter reading, and advertising/marketing as a network operating cost in its Regulatory Accounting Statements. Victoria has not yet moved to NECF, so no NECF direct costs have been incurred. Demand management expenditure is included in the six mandatory network overhead subcategories.

For the capitalised portion an explanation has been provided as to why this is capitalised.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷¹ data green**; and **ESTIMATED⁷²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response: The data for the expenditure categories and cost allocations for the years 2009-2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Overhead Expenditure Before Allocation: The SAP financial system is used to extract the information required to state the DNSP overhead information by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments in accordance with the cost allocation methodology. Information presented in this table utilises the cost allocation methodology applicable for the particular year</p> <p>Capitalised Overheads: FLEET & PROPERTY OVERHEAD PNS OVERHEAD</p> <p>The business has taken the position that as the core operation of the business is the management of the distribution network, then overhead costs of managing the business are deemed to be unavoidable costs that are directly attributable to construction activity. The effect of the policy is to allocate these overheads between capital and maintenance activities, and between categories of distribution service.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	No estimated data
2010	As per 2009
2011	As per 2009

⁷¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	No estimated data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No estimated data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.10 Overheads	
Table name 2.10.1 - NETWORK OVERHEADS EXPENDITURE	
NETWORK OVERHEADS	All estimated data. Includes basis for items: NETWORK MANAGEMENT NETWORK PLANNING NETWORK CONTROL AND OPERATIONAL SWITCHING QUALITY AND STANDARD FUNCTIONS PROJECT GOVERNANCE AND RELATED FUNCTIONS

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

14. OVERHEADS EXPENDITURE

14.1 Report overhead expenditure before it is allocated to services or direct expenditure, and before any part of it is capitalised.

14.2 CitiPower must disaggregate network operating costs into the following six subcategories:

- (a) network management
- (b) network planning
- (c) network control and operational switching personnel
- (d) quality and standard functions
- (e) project governance and related functions
- (f) other.

14.3 For the avoidance of doubt, the following expenditures must be provided in regulatory template 2.10:

(a) Table 2.10.1 Network Overhead – If CitiPower has previously reported network operating costs in its Regulatory Accounting Statements, CitiPower must report these under network overhead in regulatory template 2.10.1:

- (i) network management
- (ii) network planning
- (iii) network control and operational switching
- (iv) quality and standard functions (including standards and manuals, compliance, quality of supply, reliability, network records (GIS), and asset strategy (other than network planning)
- (v) project governance and related functions (including supervision, procurement, works management, logistics and stores) Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 38
- (vi) other (including training, OH&S functions, network billing, and customer service).

The six subcategories above are mandatory subcategories in network overhead.

(b) Table 2.10.1 Network Overhead – For other network operating costs that CitiPower previously reported in its Regulatory Accounting Statements and are not included in the six mandatory subcategories above, CitiPower must report these under network overhead in regulatory template 2.10.1. These expenditures include, but are not limited to:

- (i) meter reading
- (ii) advertising/marketing
- (iii) Guaranteed Service Level (GSL) payments
- (iv) National Energy Customer Framework (NECF)-related expenses
- (v) feed-in tariffs
- (vi) demand management expenditure
- (vii) levies

(c) Table 2.10.2 Corporate Overhead – For corporate overhead expenditure that CitiPower previously reported in its Regulatory Accounting Statements and are not included in any other overhead subcategory, CitiPower must report these under corporate overhead in regulatory template 2.10.2. These expenditures include, but are not limited to:

- (i) office of the CEO
- (ii) legal and secretariat
- (iii) human resources
- (iv) finance
- (v) regulatory
- (vi) insurance
- (vii) self-insurance
- (viii) debt raising costs
- (ix) equity raising costs
- (x) non-network IT support.

14.4 If there is any overhead expenditure that is capitalised:

- (a) explain, in the Basis of Preparation, why it is capitalised
- (b) if there is a material change in reported expenditures in the Initial Regulatory Years or in Subsequent Regulatory Years due to a change in capitalisation policy, identify the expenditure categories and quantum of capex and opex that are affected and explain this in the Basis of Preparation.

Please provide a Response in this box:

Network Overheads have been reported consistent with the cost allocation methodology, Regulatory Financial Statements and opex categories in place at the time for those regulatory years, with the exception of the 2011 and 2012 years.

CitiPower's approved CAM for 2011 and 2012 was inconsistent with the AER's final distribution determination 2011-15 service classification. In December 2013 the AER approved an amended CAM which is consistent with the AER's final distribution determination 2011-15 service classification. For the purposes of this RIN, CitiPower has deemed that the 2011 and 2012 Regulatory Accounting Statements restated to be consistent with the approved amended CAM are the relevant Regulatory Accounting Statements. On this basis, opex has been reported consistent with the cost allocation methodologies, Regulatory Financial Statements and opex categories that applied in the relevant year.

Network overheads have been reported before allocation to services or direct expenditure, and before any part of it is capitalised.

CitiPower has restated its network operating costs and applicable network management overheads in accordance with the following categorisation as defined by the AER:

- (i) network management
- (ii) network planning
- (iii) network control and operational switching
- (iv) quality and standard functions (including standards and manuals, compliance, quality of supply, reliability, network records (GIS), and asset strategy (other than network planning)
- (v) project governance and related functions (including supervision, procurement, works management, logistics and stores) Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 38
- (vi) other (including training, OH&S functions, network billing, and customer service).

The six subcategories above are mandatory subcategories in network overhead.

For the capitalised portion an explanation has been provided as to why this is capitalised.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷³ data green**; and **ESTIMATED⁷⁴/derived data red**

⁷³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response: The data for the expenditure categories and cost allocations for the years 2009-2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower.

The FTE data used for the estimation basis is sourced from the SAP HR payroll system.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Overhead Expenditure Before Allocation: The SAP financial system is used to extract the information required to state the DNSP overhead information by category and regulatory segment. The information is reported consistent with the cost allocation methodology applicable for the particular year. An allocation based on FTE has been used as an estimate to allocate expenditure previously reported as network operating expenditure and applicable direct network overheads into the AER defined categories.</p> <p>Capitalised Overheads: NETWORK MANAGEMENT NETWORK PLANNING NETWORK CONTROL AND OPERATIONAL SWITCHING QUALITY AND STANDARD FUNCTIONS PROJECT GOVERNANCE AND RELATED FUNCTIONS</p> <p>The business has taken the position that as the core operation of the business is the management of the distribution network, then overhead costs of managing the business are deemed to be unavoidable costs that are directly attributable to construction activity. The effect of the policy is to allocate the applicable pools of overheads between capital and maintenance activities, and between categories of distribution service. The Network operating component previously reported as operating expenditure within the Regulatory financial statements is not allocated to capital and maintenance activities.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	CitiPower did not capture expenditure in accordance with these categories as defined by the AER and therefore cannot use cost elements within SAP in order to disaggregate the data for the purposes of apportioning overhead costs between these categories.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

⁷⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The material driver for these costs is labour. It was therefore determined that the best basis for estimation between the AER defined categories was to split the costs based on an FTE allocation between these defined categories. FTE data was sourced from the SAP HR payroll system. Roles were allocated as best estimate by management between these categories in accordance with the definitions found in the AER Explanatory Statement.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	As the business did not capture expenditure in accordance with the AER defined categories, the selected approach based on an FTE allocation estimate was determined as the best representation based on employee effort on these functions.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.10 Overheads	
Table name 2.10.2 - CORPORATE OVERHEADS EXPENDITURE	
CORPORATE OVERHEADS	All actual data. Includes basis for items: OFFICE OF THE CEO DEBT RAISING COSTS FINANCE LEGAL & SECRETARIAT REGULATORY HUMAN RESOURCES IT INSURANCE SELF INSURANCE EQUITY RAISING COSTS OTHER

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

14. OVERHEADS EXPENDITURE

14.1 Report overhead expenditure before it is allocated to services or direct expenditure, and before any part of it is capitalised.

14.2 CitiPower must disaggregate network operating costs into the following six subcategories:

- (a) network management
- (b) network planning
- (c) network control and operational switching personnel
- (d) quality and standard functions
- (e) project governance and related functions
- (f) other.

14.3 For the avoidance of doubt, the following expenditures must be provided in regulatory template 2.10:

(a) Table 2.10.1 Network Overhead – If CitiPower has previously reported network operating costs in its Regulatory Accounting Statements, CitiPower must report these under network overhead in regulatory template 2.10.1:

- (i) network management
 - (ii) network planning
 - (iii) network control and operational switching
 - (iv) quality and standard functions (including standards and manuals, compliance, quality of supply, reliability, network records (GIS), and asset strategy (other than network planning)
 - (v) project governance and related functions (including supervision, procurement, works management, logistics and stores) Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 38
 - (vi) other (including training, OH&S functions, network billing, and customer service).
- The six subcategories above are mandatory subcategories in network overhead.

(b) Table 2.10.1 Network Overhead – For other network operating costs that CitiPower previously reported in its Regulatory Accounting Statements and are not included in the six mandatory subcategories above, CitiPower must

report these under network overhead in regulatory template 2.10.1. These expenditures include, but are not limited to:

- (i) meter reading
- (ii) advertising/marketing
- (iii) Guaranteed Service Level (GSL) payments
- (iv) National Energy Customer Framework (NECF)-related expenses
- (v) feed-in tariffs
- (vi) demand management expenditure
- (vii) levies

(c) Table 2.10.2 Corporate Overhead – For corporate overhead expenditure that CitiPower previously reported in its Regulatory Accounting Statements and are not included in any other overhead subcategory, CitiPower must report these under corporate overhead in regulatory template 2.10.2. These expenditures include, but are not limited to:

- (i) office of the CEO
- (ii) legal and secretariat
- (iii) human resources
- (iv) finance
- (v) regulatory
- (vi) insurance
- (vii) self-insurance
- (viii) debt raising costs
- (ix) equity raising costs
- (x) non-network IT support.

14.4 If there is any overhead expenditure that is capitalised:

- (a) explain, in the Basis of Preparation, why it is capitalised
- (b) if there is a material change in reported expenditures in the Initial Regulatory Years or in Subsequent Regulatory Years due to a change in capitalisation policy, identify the expenditure categories and quantum of capex and opex that are affected and explain this in the Basis of Preparation.

Please provide a Response in this box:

Corporate Overheads have been reported consistent with the cost allocation methodology, Regulatory Financial Statements and opex categories in place at the time for those regulatory years, with the exception of the 2011 and 2012 years.

CitiPower's approved CAM for 2011 and 2012 was inconsistent with the AER's final distribution determination 2011-15 service classification. In December 2013 the AER approved an amended CAM which is consistent with the AER's final distribution determination 2011-15 service classification. For the purposes of this RIN, CitiPower has deemed that the 2011 and 2012 Regulatory Accounting Statements restated to be consistent with the approved amended CAM are the relevant Regulatory Accounting Statements. On this basis, opex has been reported consistent with the cost allocation methodologies, Regulatory Financial Statements and opex categories that applied in the relevant year.

Corporate overheads have been reported before allocation to services or direct expenditure, and before any part of it is capitalised.

For the capitalised portion an explanation has been provided as to why this is capitalised.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁵ data green**; and **ESTIMATED⁷⁶/derived data red**

⁷⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response: The data for the expenditure categories and cost allocations for the years 2009-2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Overhead Expenditure Before Allocation: The SAP financial system is used to extract the information required to state the DNSP overhead information by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments in accordance with the cost allocation methodology. Information presented in this table utilises the cost allocation methodology applicable for the particular year</p> <p>Capitalised Overheads: OFFICE OF THE CEO FINANCE LEGAL & SECRETARIAT REGULATORY HUMAN RESOURCES IT OTHER</p> <p>The businesses identifies the following corporate overheads as directly attributable to direct costs:</p> <ul style="list-style-type: none"> • 50% of Chief Executive Officer (CEO) • Finance • Company secretary and legal • Human resources • Regulation • IT support & maintenance <p>A corporate overhead rate is calculated and input into the SAP system which then applies the corporate overhead rate to all direct costs (capital and maintenance expenditure) by individual cost element. The business has taken the position that as the core operation of the business is the management of the distribution network, then overhead costs of managing the business are deemed to be unavoidable costs that are directly attributable to construction activity. The effect of the policy is to allocate these overheads between capital and maintenance activities, and between categories of distribution service.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

⁷⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	No estimated data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	No estimated data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No estimated data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

2.11 Labour

AER CATEGORY ANALYSIS RIN

Tab name: 2.11 Labour	
Table name 2.11.1 - COST METRICS PER ANNUM	
(ALL Categories)	All estimated data. <u>Includes</u> basis for items: ASL (0'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

4. LABOUR COST INFORMATION

4.1 Only labour costs allocated to the provision of standard control services should be reported in the labour cost tables in regulatory template 2.11.

4.2 Labour used in the provision of contracts for both goods and services, other than contracts for the provision of labour (i.e. labour hire contracts) must not be reported in these tables.

4.3 CitiPower must break down its labour data (both employees and labour contracted through labour hire contracts) into the Classification Levels provided in the relevant table in the template. CitiPower must explain how it has grouped workers into these Classification Levels.

4.4 Labour related to each classification level obtained through labour hire contracts may be reported separately on separate lines to employee based labour. If CitiPower wishes to do this they should add extra lines in the regulatory template below each classification level for which it wishes to separately report labour hire.

4.5 Quantities of labour, expenditure, or stand down periods should not be reported multiple times across labour tables. However, labour may be split between tables (for example one worker could have half of their time allocated to corporate overheads and half of their time to network overheads).

4.6 The ASLs for each Classification Level must reflect the average Paid FTEs for each Classification Level over the course of the year.

4.7 'Per ASL' values are average values per ASL in each Classification Level. For example, the average productive work hours per ASL would equal the total productive work hours associated with labour in the Classification Level divided by the number reported in Annual Totals – ASLs for the Classification Level (i.e. the number of ASLs in the Classification Level).

4.8 Stand down periods must be reported against the relevant classification level in the table containing the relevant labour. For example, a stand down of an electrical line apprentice would be reported against the apprentice classification level in the Total network direct internal labour costs table.

Please provide a Response in this box:

In accordance with the requirements of the RIN notice:

- ASL's have been reported consistent with the definition of labour in this RIN notice. CitiPower has included all internal ASL's and ASL's relating to contracts primarily for the provision of labour consistent with the mapping of labour cost reported in the RIN notice.
- Only ASL's relating to standard control services has been reported in this labour template.

- All ASL's have been reported against the mandatory classification levels in the table
- No ASL's have been reported multiple times within the tables
- ASL's per classification level is reported as an average across the relevant years

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁷ data green**; and **ESTIMATED⁷⁸/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data for ASL's for the years 2009-2013 has been sourced from both the SAP HR payroll system for internal employees and management estimates for external contractor ASL's. Labour escalations for award employees have been sourced from the approved EBA.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>In order to establish ASL's working on standard control services CitiPower must work back from the ASL data relating to Victoria Power Networks (VPN). For the VPN group the legal employer of the employee is not representative of the business on which that employee work is expended. For that reason the following methodology was followed in order to establish ASL's relating to Standard Control, by segment and classification category.</p> <p>VPN Internal ASL's have been collated as per the VPN Business Report, sourced from SAP HR payroll data in each month over the 5 year period.</p> <p>VPN External ASL's relating to contracts primarily for the provision of labour have been added to the VPN internal ASL's to establish a total VPN ASL's. This information has been sourced from management estimates in order to best align with labour contract invoicing.</p> <p>Management estimates have then been used to remove those ASL's working on non-distribution services within the VPN group in order to establish distribution business ASL's for Powercor & CitiPower combined.</p> <p>Utilising HR payroll data and applying a mapping against the role descriptions employees have been categorised as best as possible against the category descriptions as supplied in the RIN for internal employees as a best estimate form management on external contract ASL's.</p>

⁷⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>Using expected labour growth rates for each of the years, based upon EBA escalation and internal non award labour escalations, ASL's for each of the years have been derived taking into account the historical build-up of ASL's by labour category.</p> <p>In order to establish the split between Powercor and CitiPower, ASL's have been split based upon the labour cost reported in each of the distribution businesses in each segment Network Overheads, Corporate Overheads and Direct.</p> <p>ASL's have then been split based upon the CitiPower labour cost splits between standard control and other distribution services for the segments Network Overheads, Corporate Overheads and Direct. Labour costs have been split between categories of distribution service in accordance with the cost allocation methodology.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>CitiPower is required to make estimates of ASL's for the following reasons;</p> <ul style="list-style-type: none"> - For the VPN group the legal employer of the employee is not representative of the business on which that employee work is expended. - CitiPower reports our internal employees only with a role description and not in accordance with the categories of labour prescribed in this template. Management therefore is required to use judgement in classifying ALS against these categories. - ASL's are not reported against categories of distribution service. - Accurate ASL data is not consistently captured for all units against external labour contracts.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Estimates have been made for the following data;</p> <ul style="list-style-type: none"> - Labour Contract ASL's – Where possible has been sourced from the labour contract invoicing / time confirmations though management estimates were required where no data existed to align with labour cost invoicing. In these circumstances, contract ASL's is estimated using the labour cost divided against the estimate of the daily rates for these ASL's. - Non Distribution ASL's – Estimates were made by management with regard to identifying those ASL's relating to Non Distribution services. Where available HR payroll data was used to assign those FTE's by job description or function of the business these employees work. Where this was not available management estimate was used to best align the ASL's to the mapping of labour costs within the VPN group. - Split of ASL's by labour category - Utilising HR payroll data and applying a mapping against the role descriptions employees have been categorised as best as possible against the category descriptions as supplied in the RIN for internal employees and as a best estimate from management on external contract ASL's. - EBA Labour Rate escalations – EBA (ETU and APESMA/ASU) for the respective years have been utilised and applied to entire years. This is an estimate as escalation fall at periods throughout the years and therefore cross different years. Application of these labour rates to the year in which they occur materially estimates the growth rates over time. - Internal Non Award Labour Rate escalations – Internal non award labour rates have been sourced form the budgeted labour rate escalation assumptions for the respective year used in setting internal salary increments. - Split between Powercor and CitiPower ASL's - ASL's have been split based upon the labour cost reported in each of the distribution businesses in each segment Network Overheads, Corporate Overheads and Direct.

	- Split between standard control and other distribution services - based upon the CitiPower labour cost splits between standard control and other distribution services for the segments Network Overheads, Corporate Overheads and Direct. Labour costs have been split between categories of distribution service in accordance with the cost allocation methodology.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	Estimates have been made for the following data; <ul style="list-style-type: none"> - Labour Contract ASL's – Where possible has been sourced from the labour contract invoicing / time confirmations though management estimates were required where no data existed to align with labour cost invoicing. In these circumstances, contract ASL's is estimated using the labour cost divided against the estimate of the daily rates for these ASL's. - Non Distribution ASL's – Estimates were made by management with regard to identifying those ASL's relating to Non Distribution services. Where available HR payroll data was used to assign those FTE's by job description or function of the business these employees work. Where this was not available management estimate was used to best align the ASL's to the mapping of labour costs within the VPN group. - Split of ASL's by labour category - Utilising HR payroll data and applying a mapping against the role descriptions employees have been categorised as best as possible against the category descriptions as supplied in the RIN for internal employees and as a best estimate from management on external contract ASL's. - Split between Powercor and CitiPower ASL's - ASL's have been split based upon the labour cost reported in each of the distribution businesses in each segment Network Overheads, Corporate Overheads and Direct. - Split between standard control and other distribution services - based upon the CitiPower labour cost splits between standard control and other distribution services for the segments Network Overheads, Corporate Overheads and Direct. Labour costs have been split between categories of distribution service in accordance with the cost allocation methodology.

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other options were identified that fit the requirements of the exercise.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.11 Labour	
Table name 2.11.1 - COST METRICS PER ANNUM	
(ALL Categories)	All estimated data. <u>Includes</u> basis for items: TOTAL LABOUR COST (\$000'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

4. LABOUR COST INFORMATION

- 4.1** Only labour costs allocated to the provision of standard control services should be reported in the labour cost tables in regulatory template 2.11.
- 4.2** Labour used in the provision of contracts for both goods and services, other than contracts for the provision of labour (i.e. labour hire contracts) must not be reported in these tables.
- 4.3** CitiPower must break down its labour data (both employees and labour contracted through labour hire contracts) into the Classification Levels provided in the relevant table in the template. CitiPower must explain how it has grouped workers into these Classification Levels.
- 4.4** Labour related to each classification level obtained through labour hire contracts may be reported separately on separate lines to employee based labour. If CitiPower wishes to do this they should add extra lines in the regulatory template below each classification level for which it wishes to separately report labour hire.
- 4.5** Quantities of labour, expenditure, or stand down periods should not be reported multiple times across labour tables. However, labour may be split between tables (for example one worker could have half of their time allocated to corporate overheads and half of their time to network overheads).
- 4.6** The ASLs for each Classification Level must reflect the average Paid FTEs for each Classification Level over the course of the year.
- 4.7** 'Per ASL' values are average values per ASL in each Classification Level. For example, the average productive work hours per ASL would equal the total productive work hours associated with labour in the Classification Level divided by the number reported in Annual Totals – ASLs for the Classification Level (i.e. the number of ASLs in the Classification Level).
- 4.8** Stand down periods must be reported against the relevant classification level in the table containing the relevant labour. For example, a stand down of an electrical line apprentice would be reported against the apprentice classification level in the Total network direct internal labour costs table.

Please provide a Response in this box:

In accordance with the requirements of the RIN notice:

- Labour cost has been reported consistent with the definition of labour in this RIN notice. CitiPower has reported all internal labour and labour relating to contracts primarily for the provision of labour.
- Only labour relating to standard control services has been reported in this labour template.

- All labour costs have been reported against the mandatory classification levels in the table
- No labour costs have been reported multiple times within the tables

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁹ data green**; and **ESTIMATED⁸⁰/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response: The data for the standard control labour cost expenditure for the years 2009-2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower.

HR payroll data has been utilised in establishing a best estimate of average remuneration by labour classification.

Internal labour rate models have been used to align assumptions with cost mapping.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>The SAP financial system is used to extract the information required to state the DNSP costs by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments in accordance with the cost allocation methodology.</p> <p>In order to establish the proportion of costs that relate to labour, as per the definition of labour in the RIN, a mapping is applied to assign GL accounts as either labour material or contract costs. This mapping is a management judgement to best align GL account definitions with RIN definitions of labour, material and contracts. Most GL accounts have been mapped in their entirety to either labour, materials or contracts. For the remaining GL accounts, management judgement has been used to estimate an allocation between labour, materials and contracts.</p> <p>The RIN notice requires labour costs to be reported against labour classifications. In order to do this labour costs for each of Network Overheads, Corporate Overheads and Direct are allocated to the labour classifications, with the allocator calculated as follows. Average remuneration has been estimated for each of the labour classifications. Utilising the reported ASL's by classification level this estimated average</p>

⁷⁹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	remuneration is multiplied the ASL's to establish a labour cost estimate. The labour cost proportion by labour classification is the allocator.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>CitiPower is required to make estimates of labour cost for the following reasons;</p> <ul style="list-style-type: none"> - The business captures costs by GL account. Whilst many of the GL accounts are readily identifiable as labour, materials or contracts there are instances where management has been required to form judgement to this labour mapping where a GL account cannot be exclusive identified as labour materials or contracts and been allocated based on management best estimate which category fits best. - CitiPower does not capture labour cost against the labour categories as specified in the RIN notice
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Estimates have been made for the following data;</p> <ul style="list-style-type: none"> - Labour / Materials / Contracts Split – A mapping is applied to assign GL accounts as either labour material or contract costs. This mapping is a management estimate assigning activity allocation GL accounts against these categories. Where a GL account materially fits one of these categories, that account has been mapped in its entirety to either labour, materials or contracts. - Estimated Average Remuneration – A best possible estimate of average remuneration has been calculated utilising the 2013 HR payroll budget salary information. Internal employees were mapped to each of the classification levels as best as possible against the RIN definitions to calculate an average total remuneration (TR) by labour classification. Adjustments were made to this TR information for the skilled electrical worker, skilled non electrical worker and apprentice for the following as they are material to these particular classifications: <ul style="list-style-type: none"> Overtime adjustment – A percentage is applied to the TR for each of these classifications to account for the average overtime per ASL. The assumption for line workers is based on the EBA and OHS fatigue policy of a limit of 390 hours of overtime per worker per year. Assumptions for other categories are based on historical averages and local knowledge by construction co-ordinators. Assumptions are monitored on a monthly basis and over years have been maintained as stable over time. Average overtime rate – An assumption has been made that overtime is paid at twice that of the ordinary time rate. This is materially representative and is consistent with all internal budget instruction and resource models and EBA's. External contractor adjustment - A percentage is applied to the TR for each of these classifications to account for both the percentage of external contractors and the relative additional labour rate for an external subcontract resource. Average hourly rate for external labour contractors is based on the 'Contractor Database' containing the field resources rates. This is compared against our internal labour rates to establish the additional cost of an external contractor. Allowance adjustment – A management best estimate has been sourced from the HR payroll data in order allocate a percentage to each of these categories with regard to the average allowances per ASL. A sampling of HR payroll data containing allowances against ASL has been referenced in order to estimate an approximate proportion of allowances by category type. Management believes this to be materially accurate in the assumptions used against the labour types within the RIN.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other options were identified that fit the requirements of the exercise.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.11 Labour	
Table name 2.11.1 - COST METRICS PER ANNUM	
(ALL Categories)	All estimated data. Includes basis for items: AVERAGE PRODUCTIVE WORK HOURS PER ASL (0'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

4. LABOUR COST INFORMATION

- 4.1** Only labour costs allocated to the provision of standard control services should be reported in the labour cost tables in regulatory template 2.11.
- 4.2** Labour used in the provision of contracts for both goods and services, other than contracts for the provision of labour (i.e. labour hire contracts) must not be reported in these tables.
- 4.3** CitiPower must break down its labour data (both employees and labour contracted through labour hire contracts) into the Classification Levels provided in the relevant table in the template. CitiPower must explain how it has grouped workers into these Classification Levels.
- 4.4** Labour related to each classification level obtained through labour hire contracts may be reported separately on separate lines to employee based labour. If CitiPower wishes to do this they should add extra lines in the regulatory template below each classification level for which it wishes to separately report labour hire.
- 4.5** Quantities of labour, expenditure, or stand down periods should not be reported multiple times across labour tables. However, labour may be split between tables (for example one worker could have half of their time allocated to corporate overheads and half of their time to network overheads).
- 4.6** The ASLs for each Classification Level must reflect the average Paid FTEs for each Classification Level over the course of the year.
- 4.7** 'Per ASL' values are average values per ASL in each Classification Level. For example, the average productive work hours per ASL would equal the total productive work hours associated with labour in the Classification Level divided by the number reported in Annual Totals – ASLs for the Classification Level (i.e. the number of ASLs in the Classification Level).
- 4.8** Stand down periods must be reported against the relevant classification level in the table containing the relevant labour. For example, a stand down of an electrical line apprentice would be reported against the apprentice classification level in the Total network direct internal labour costs table.

Please provide a Response in this box:

In accordance with the requirements of the RIN notice:

- Productive Work Hours per ASL has been reported consistent with the definition of labour in this RIN notice. CitiPower has included all internal ASL's and ASL's relating to contracts primarily for the provision of labour consistent with the mapping of labour cost reported in the RIN notice.
- Only ASL's relating to standard control services has been reported in this labour template.

- All ASL's have been reported against the mandatory classification levels in the table

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁸¹ data green**; and **ESTIMATED⁸²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data for productive work hours for the years 2009-2013 has is based on a series of assumptions, some of which are sourced from labour rate calculation models and others management estimates.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>In order to establish Productive work hours per ASL for standard control services, CitiPower has used a series of assumptions as follows;</p> <p>4 distinct labour categories each have been assigned a different set of assumption. A differing methodology has been applied to these categories as they have been identified as having a distinct difference in assumption drivers. These categories are:</p> <ul style="list-style-type: none"> Skilled Electrical Worker Skilled Non Electrical Worker Apprentices All other categories <p>A methodology has then been followed using the following assumptions:</p> <p>Available days</p> <ul style="list-style-type: none"> Available working days – Excluding Public Holidays (Days) <p><i>Deduct the following assumptions</i></p> <ul style="list-style-type: none"> Annual Leave (Days) Sick/Carer's/Special Leave (Days) Long Service leave (Days)

⁸¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>Available hours per day</p> <p>Total available ordinary time hours per ASL</p> <p><i>Deduct the following assumptions</i></p> <p>Total unconfirmed ordinary time hours per ASL</p> <p><i>Add the following assumptions</i></p> <p>Total overtime hours per ASL</p> <p>Productive hours per ASL is then calculated as:</p> <p>Available days x Available hours per day</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>CitiPower is required to make estimates of productive work hours for the following reasons;</p> <ul style="list-style-type: none"> - For the VPN group the legal employer of the employee is not representative of the business on which that employee work is expended. - CitiPower reports our internal employees only with a role description and not in accordance with the categories of labour prescribed in this template. Management therefore is required to use judgement in classifying ASL's against these categories. - Internal employees are not reported against categories of distribution service. - Accurate ASL data is not consistently captured for all units against external labour contracts.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Estimates have been made for the following data;</p> <ul style="list-style-type: none"> - Annual Leave (Days) – Management estimate, consistent with labour rate models. Each ASL accumulates four weeks recreational leave per year. On average over time the assumption is that this level of annual leave will be taken each year. - Sick/Carer's/Special Leave (Days) – Management estimate, consistent with labour rate models. Based on a sampling of our largest workforce segment, field resources, the assumption is based on average days taken over one year. This assumption has been assumed as materially accurate to apply to all labour categories. - Long Service leave (Days) – Management estimate, consistent with labour rate models. Based on a sampling of our largest workforce segment, field resources, the assumption is based on average days taken over one year. This assumption has been assumed as materially accurate to apply to all labour categories. - Total unconfirmed ordinary time hours per ASL – Management estimate, utilising assumptions contained within labour rate models. Unconfirmed ordinary time accounts for the time spent on training, meetings, lost time due to wet weather and other time spent on non-construction activity. Assumptions for unconfirmed time are based on experience and local knowledge by construction co-ordinators. Assumptions are monitored on a monthly basis and over years have been maintained as stable over time. - Total overtime hours per ASL - Management estimate, utilising assumptions contained within labour rate models. Assumption for line workers is based on the EBA and OHS fatigue policy of a limit of 390 hours of overtime per worker per year. Assumptions for overtime are based on historical averages and local knowledge by construction co-ordinators. Assumptions are monitored on a monthly basis and

	over years have been maintained as stable over time.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other options were identified that fit the requirements of the exercise.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.11 Labour	
Table name 2.11.1 - COST METRICS PER ANNUM	
(ALL Categories)	All estimated data. Includes basis for items: STAND-DOWN OCCURENCES PER ASL (0'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

4. LABOUR COST INFORMATION

4.1 Only labour costs allocated to the provision of standard control services should be reported in the labour cost tables in regulatory template 2.11.

4.2 Labour used in the provision of contracts for both goods and services, other than contracts for the provision of labour (i.e. labour hire contracts) must not be reported in these tables.

4.3 CitiPower must break down its labour data (both employees and labour contracted through labour hire contracts) into the Classification Levels provided in the relevant table in the template. CitiPower must explain how it has grouped workers into these Classification Levels.

4.4 Labour related to each classification level obtained through labour hire contracts may be reported separately on separate lines to employee based labour. If CitiPower wishes to do this they should add extra lines in the regulatory template below each classification level for which it wishes to separately report labour hire.

4.5 Quantities of labour, expenditure, or stand down periods should not be reported multiple times across labour tables. However, labour may be split between tables (for example one worker could have half of their time allocated to corporate overheads and half of their time to network overheads).

4.6 The ASLs for each Classification Level must reflect the average Paid FTEs for each Classification Level over the course of the year.

4.7 'Per ASL' values are average values per ASL in each Classification Level. For example, the average productive work hours per ASL would equal the total productive work hours associated with labour in the Classification Level divided by the number reported in Annual Totals – ASLs for the Classification Level (i.e. the number of ASLs in the Classification Level).

4.8 Stand down periods must be reported against the relevant classification level in the table containing the relevant labour. For example, a stand down of an electrical line apprentice would be reported against the apprentice classification level in the Total network direct internal labour costs table.

Please provide a Response in this box:

In accordance with the requirements of the RIN notice:

- Stand down periods have been reported against a material best estimate of the relevant classification level in the table.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁸³ data green**; and **ESTIMATED⁸⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response: The data for stand down occurrences for the years 2009-2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	The SAP financial system is used to extract the information required to state the DNSP costs by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments in accordance with the cost allocation methodology. When a stand down event occurs time confirmations are made to specific stand down orders by these individuals for internal and external contract labour resources. Using this SAP data the total number of stand down events is determined. The total number of stand down events is then divided by the ASL's for that labour category to determine total stand down occurrences per ASL.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	CitiPower is required to make estimates of stand for the following reasons; - Stand down occurrences are captured for all work performed for CitiPower and Powercor and not split between these distribution businesses.
2010	As per 2009
2011	As per 2009

⁸³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Estimates have been made for the following data; - Split of stand down occurrences between Powercor & CitiPower – Stand down occurrences have been split using the split of total labour cost between Powercor and Citipower.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other options were identified that fit the requirements of the exercise.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.11 Labour	
Table name 2.11.2 - EXTRA DESCRIPTOR METRICS FOR CURRENT YEAR	
(ALL Categories)	All estimated data. Includes basis for items: AVERAGE PRODUCTIVE WORK HOURS PER ASL - ORDINARY TIME (0'S) AVERAGE PRODUCTIVE WORK HOURS HOURLY RATE PER ASL - ORDINARY TIME (0'S) AVERAGE PRODUCTIVE WORK HOURS PER ASL - OVERTIME (0'S) AVERAGE PRODUCTIVE WORK HOURS HOURLY RATE PER ASL - OVERTIME (0'S)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

4. LABOUR COST INFORMATION

- 4.1 Only labour costs allocated to the provision of standard control services should be reported in the labour cost tables in regulatory template 2.11.
- 4.2 Labour used in the provision of contracts for both goods and services, other than contracts for the provision of labour (i.e. labour hire contracts) must not be reported in these tables.
- 4.3 CitiPower must break down its labour data (both employees and labour contracted through labour hire contracts) into the Classification Levels provided in the relevant table in the template. CitiPower must explain how it has grouped workers into these Classification Levels.
- 4.4 Labour related to each classification level obtained through labour hire contracts may be reported separately on separate lines to employee based labour. If CitiPower wishes to do this they should add extra lines in the regulatory template below each classification level for which it wishes to separately report labour hire.
- 4.5 Quantities of labour, expenditure, or stand down periods should not be reported multiple times across labour tables. However, labour may be split between tables (for example one worker could have half of their time allocated to corporate overheads and half of their time to network overheads).
- 4.6 The ASLs for each Classification Level must reflect the average Paid FTEs for each Classification Level over the course of the year.
- 4.7 ‘Per ASL’ values are average values per ASL in each Classification Level. For example, the average productive work hours per ASL would equal the total productive work hours associated with labour in the Classification Level divided by the number reported in Annual Totals – ASLs for the Classification Level (i.e. the number of ASLs in the Classification Level).
- 4.8 Stand down periods must be reported against the relevant classification level in the table containing the relevant labour. For example, a stand down of an electrical line apprentice would be reported against the apprentice classification level in the Total network direct internal labour costs table.

Please provide a Response in this box:

In accordance with the requirements of the RIN notice:

- Productive Work Hours per ASL has been reported consistent with the definition of labour in this RIN notice. CitiPower has included all internal ASL's and ASL's relating to contracts primarily for the provision of labour consistent with the mapping of labour cost reported in the RIN notice.
- Only ASL's relating to standard control services has been reported in this labour template.
- All ASL's have been reported against the mandatory classification levels in the table

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁸⁵ data green**; and **ESTIMATED⁸⁶/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response: The data for productive work hours, split between ordinary time and overtime for the years 2009-2013 is based on a series of assumptions, some of which are sourced from the labour rate calculation models and others management estimates.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>In order to establish ordinary and overtime work hours per ASL for standard control services, CitiPower has used a series of assumptions as follows;</p> <p>3 distinct labour categories each have been assigned a different set of assumption. These categories are: Skilled Electrical Worker Skilled Non Electrical Worker Apprentices</p> <p>A methodology has then been followed using the following assumptions:</p> <p>Available days Available working days – Excluding Public Holidays (Days)</p> <p><i>Deduct the following assumptions</i> Annual Leave (Days) Sick/Carer's/Special Leave (Days) Long Service leave (Days)</p>

⁸⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>Available hours per day</p> <p>Total available ordinary time hours per ASL</p> <p><i>Deduct the following assumptions</i></p> <p>Total unconfirmed ordinary time hours per ASL</p> <p><i>Add the following assumptions</i></p> <p>Total overtime hours per ASL</p> <p>Productive hours per ASL is then calculated as:</p> <p>Available days x Available hours per day</p> <p>Overtime rate as a proportion of ordinary time is then then applied to the assumption of overtime hours per ASL to determine the split between ordinary and overtime hours / rate.</p> <p><u>Note</u> – No overtime assumption has been made for other labour categories as the overtime component is immaterial.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>CitiPower is required to make estimates of ordinary and over time for the following reasons;</p> <ul style="list-style-type: none"> - For the VPN group the legal employer of the employee is not representative of the business on which that employee work is expended. - CitiPower reports our internal employees only with a role description and not in accordance with the categories of labour prescribed in this template. Management therefore is required to use judgement in classifying ALS against these categories. - Internal employees are not reported against categories of distribution service. - Accurate ASL data is not consistently captured for all units against external labour contracts.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>Estimates have been made for the following data;</p> <ul style="list-style-type: none"> - Annual Leave (Days) – Management estimate, consistent with labour rate models. Each ASL accumulates four weeks recreational leave per year. On average over time the assumption is that this level of annual leave will be taken each year. - Sick/Carer's/Special Leave (Days) – Management estimate, consistent with labour rate models. Based on a sampling of our largest workforce segment, field resources, the assumption is based on average days taken over one year. This assumption has been assumed as materially accurate to apply to all labour categories. - Long Service leave (Days) – Management estimate, consistent with labour rate models. Based on a sampling of our largest workforce segment, field resources, the assumption is based on average days taken over one year. This assumption has been assumed as materially accurate to apply to all labour categories. - Total unconfirmed ordinary time hours per ASL – Management estimate, utilising assumptions contained within labour rate models. Unconfirmed ordinary time accounts for the time spent on training, meetings, lost time due to wet weather and other time spent on non-construction activity. Assumptions for unconfirmed time are based on experience and local knowledge by construction co-ordinators.

	Assumptions are monitored on a monthly basis and over years have been maintained as stable over time. - Total overtime hours per ASL - Management estimate, utilising assumptions contained within labour rate models. Assumption for line workers is based on the EBA and OHS fatigue policy of a limit of 390 hours of overtime per worker per year. Assumptions for other categories are based on historical averages and local knowledge by construction co-ordinators. Assumptions are monitored on a monthly basis and over years have been maintained as stable over time.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other options were identified that fit the requirements of the exercise.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

2.12 Input tables

AER CATEGORY ANALYSIS RIN

Tab name: 2.12 Input Tables	
(ALL Categories)	All estimated data. Includes basis for items: DIRECT MATERIAL COST DIRECT LABOUR COST CONTRACT COST OTHER COST

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

As per the definitions in the RIN Notice

Labour costs - The costs of:

- Labour hire; and
- Ordinary time earnings; and
- Other earnings, on-costs and taxes; and
- Superannuation.

Labour hire – means expenditure:

- incurred under labour hire contracts.
- Excludes expenditure required under contracts other than labour hire contracts, Regulatory Information

Notice under Division 4 of Part 3 of the National Electricity Law 53 irrespective of whether or not the contract includes a labour component.

Contract Costs - A legally binding contract

Please provide a Response in this box:

In accordance with the requirements of the RIN notice:

- Labour and Contract costs have been reported consistent with the definitions contained in the RIN notice. As a definition has not been listed for materials an interpretation has been made internally to allocate costs appropriately.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁸⁷ data green**; and **ESTIMATED⁸⁸/derived data red**

⁸⁷ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁸⁸ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response: The data for the labour, material, contract, other cost expenditure for the years 2009-2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>The SAP financial system is used to extract the information required to state the DNSP costs by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments in accordance with the cost allocation methodology.</p> <p>In order to establish the proportion of costs that relate to labour, materials, contracts and others as per the definition of labour in the RIN, a mapping is applied to assign GL accounts as either labour, materials contracts or other costs. This mapping is a management judgement to best align GL account definitions with RIN definitions of labour, material, contracts and others. Most GL accounts have been mapped in their entirety to either labour, materials or contracts. For the remaining GL accounts, management judgement has been used to estimate an allocation between labour, materials, contracts and other.</p> <p><u>Note</u> – The basis of preparation for the assignment of costs between work type categories has been specified in the BOP’s relating to these categories within the RIN template. This basis of preparation addresses the methodology for the split of these categories between labour, materials, contracts and other.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>CitiPower is required to make estimates for the following reasons;</p> <ul style="list-style-type: none"> - The business captures costs by GL account. Whilst many of the GL accounts are readily identifiable as labour, materials contracts or other, there are instances where management has been required to form judgement to this labour mapping where a GL account cannot be exclusive identified as labour materials, contracts or other and has been allocated based on management best estimate which category fits best.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
------	--

2009	Estimates have been made for the following data; - Labour / Materials / Contracts / Other Split – A mapping is applied to assign cost elements as either labour, material, contract or other costs. This mapping is a management estimate assigning activity allocation GL accounts against these categories. Where a GL account materially fits one of these categories, that account has been mapped in its entirety to either labour, materials or contracts.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other options were identified that fit the requirements of the exercise.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 2.12 Input Tables	
(ALL Categories)	All estimated data. Includes basis for items: <p style="text-align: center;">RELATED PARTY CONTRACT COST RELATED PARTY CONTRACT MARGIN</p>

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

As per the definitions in the RIN Notice

Related Party - In relation to CitiPower, any other entity that:

- had, has or is expected to have control or significant influence over CitiPower;
- was, is or is expected to be subject to control or significant influence from CitiPower;
- was, is or is expected to be controlled by the same entity that controlled, controls or is expect to control CitiPower referred to as a situation in which entities are subject to common control;
- was, is or is expected to be controlled by the same entity that significantly influenced, influences or is expected to influence CitiPower; or
- was, is or is expected to be significantly influenced by the same entity that controlled, controls or is expected to control CitiPower;

but excludes any other entity that would otherwise be related solely due to normal dealings of:

- financial institutions;
- authorised trustee corporations as prescribed in Schedule 9 of the Corporations Regulations 2001 (Cth);
- fund managers;
- trade unions;
- statutory authorities;
- government departments;
- local governments and includes CitiPower Australia Ltd (ACN 064 651 109); or
- where any of the entities identified in sub-paragraphs (a) to (e) have novated or assigned a contract or arrangement to or from another entity (where that contract or arrangement relates to the provision of distribution services by CitiPower, the entity to whom that contract or arrangement has been novated or assigned.

Related party contract - A finalised Contract between CitiPower and a Related Party for the provision of goods and/or services

Related party margin - The dollar amount of profit a Related Party gains above its total actual costs under a Related Party Contract with CitiPower. This profit may include margins, management fees or incentive payments.

Please provide a Response in this box:

In accordance with the requirements of the RIN notice:

- Related Party Contract costs and margins have been reported consistent with the definitions contained in the RIN.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁸⁹ data green**; and **ESTIMATED⁹⁰/derived data red**

⁸⁹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response: The data for the related party costs and margins for the years 2009-2013 has been sourced from related party SAP accounting systems. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for related parties. In addition to this, as part of the Annual RIN process related parties are required to provide the actual cost of providing services. This under or over recovery by related party is allocated on pro rata basis across the specific activity.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	The methodology used to state the related party information is as follows; Related Party Margins – Detailed related party data was extracted from the related party SAP accounting systems. This data does not align to the categories in the input tables and is allocated in accordance with the allocation of all other costs and described in their basis of preparations. Related Party Contract Cost – Utilising the total costs of each related party contract as reported in the Annual RIN's, which has been extracted from cost elements within SAP, total related party contract costs have been apportioned utilising a combination of margin and direct cost to represent the related party cost applicable to the categories in the RIN. Whilst estimating the related party contract costs by category the total related party contract reported in the RIN reflect that of previously reported Annual RIN's. Utilising the assumption that particular maintenance functions are known to be primarily either performed by a related party or externally provided, further alignment was made between opex direct and opex overheads to ensure related party cost best reflect management's best estimate.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	CitiPower is required to make estimates for the following reasons; <ul style="list-style-type: none"> - CitiPower does not readily have access to complete and comprehensive information supporting the related party contracts at the more granular level of the Category Analysis RIN. - As the actual cost from the related party is not identifiable at an activity level there is a level of estimation in applying the pro rata.
2010	As per 2009
2011	As per 2009

purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁹⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Estimates have been made for the following data; Related party contract costs by work type category – In arriving at the chosen methodology, CitiPower explored a pro rata allocation using margins, an approach using a mix of pro rata and direct cost allocation and the chosen methodology utilising a mix of margin, direct cost and management estimates.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	In evaluating all methods considered, CitiPower believes that the related party contract costs reported by category within the RIN, using the chosen methodology, best represents managements estimate of the underlying contract cost by category.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a



AER Category Analysis RIN

CitiPower Pty

Basis of Preparation documents

Part C

2 June 2014

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4.1 Public Lighting

AER CATEGORY ANALYSIS RIN

Tab name: 4.1 Public Lighting	
Table name: 4.1.1 Current Population of Lights	
Asset Group	Asset Category
Public Lighting by : Asset Type; Current Year	(ALL Categories)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

- 17.1 CitiPower must ensure that the data provided for public lighting services reconcile to internal planning models used in generating CitiPower's proposed revenue requirements.
- 17.2 CitiPower is not required to distinguish expenditure for public lighting services between standard or alternative control services in regulatory template 4.1.
- 17.3 CitiPower is not required to distinguish expenditure for public lighting services as either capex or opex in regulatory template 4.1.
- 17.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.
- 17.5 CitiPower must report data for non-contestable, regulated public lighting services. This includes work performed by third parties on behalf of CitiPower.
- 17.6 CitiPower must not report data in relation to gifted assets, negotiated public lighting services or public lighting services which have been classified as contestable by the AER.
- 17.7 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for a public lighting service.
- 17.8 In the basis of preparation, CitiPower must explain how the average unit cost for public lighting services was estimated.

Definitions

Light type CitiPower should nominate the light type and/or standard wattage used. This will be consistent with the light types listed in annual tariff proposals. For example: Sodium, Fluorescent, Mercury, Metal Halide lighting types.

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 4.1.1 Current Population of Lights by light type. We have provided data that complies with the instructions and definitions specified in the requirements of the notice as follows:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

- 17.1 not applicable
- 17.2 not applicable
- 17.3 not applicable
- 17.4 not applicable
- 17.5 we have provided data for non-contestable, regulated public lighting services
- 17.6 not applicable
- 17.7 not applicable
- 17.8 not applicable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹ data green**; and **ESTIMATED²/derived data red**

CURRENT POPULATION OF LIGHTS

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

CURRENT POPULATION OF LIGHTS

- The source data was extracted from GIS system listing all billable lights on the last day of the reportable year.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	<p>Methodology</p> <ul style="list-style-type: none"> Per definition of "light type" only in service and billable lights were extracted from GIS. Asset quantities were allocated across light types based on the definition listed above. <p>Assumptions</p> <ul style="list-style-type: none"> Only in service and billable lights were reported Metal Halide lights were combined where the wattage was the same.

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	No estimate required

¹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	No estimate required

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	No estimate required

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Data for 2009 – 2012 was not provided as it was not required per the template provided by AER

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.1 Public Lighting	
Table name: 4.1.2 LIGHT INSTALLATION – VOLUME OF WORKS AND EXPENDITURE	
Asset Group	Asset Category
Public Lighting by : Asset Type; Current Year	(ALL Categories)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES</p> <p>17.1 CitiPower must ensure that the data provided for public lighting services reconcile to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>17.2 CitiPower is not required to distinguish expenditure for public lighting services between standard or alternative control services in regulatory template 4.1.</p> <p>17.3 CitiPower is not required to distinguish expenditure for public lighting services as either capex or opex in regulatory template 4.1.</p> <p>17.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.</p> <p>17.5 CitiPower must report data for non-contestable, regulated public lighting services. This includes work performed by third parties on behalf of CitiPower.</p> <p>17.6 CitiPower must not report data in relation to gifted assets, negotiated public lighting services or public lighting services which have been classified as contestable by the AER.</p> <p>17.7 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for a public lighting service.</p> <p>17.8 In the basis of preparation, CitiPower must explain how the average unit cost for public lighting services was estimated.</p> <p>Definitions</p> <p><i>Light installation: The installation on a major or minor road for the purpose of establishing new: Luminaires, including associated components such as bracket and lamp.</i></p> <p><i>The installation may also include:</i></p> <ul style="list-style-type: none"> · Poles dedicated to public lighting services and · Underground or overhead cabling dedicated to public lighting services. <p><i>Major road: Roads on which the visual requirements of motorists are dominant (e.g. traffic routes). Typically the responsibility of a state or territory road authority.</i></p> <p><i>Minor road: Roads on which the visual requirements of pedestrians are dominant (e.g. local roads and lighting that is applicable to areas other than roads outdoor public areas, e.g. outdoor shopping). Typically the responsibility of a local Government authority.</i></p>

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 4.1.1 Current Population of Lights by light type. We have provided data that complies with the instructions and definitions specified in the requirements of the notice as follows:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

- 17.1 the data provided for public lighting services reconcile to internal planning models
- 17.2 not applicable
- 17.3 not applicable
- 17.4 we have reported total expenditure data as a gross amount

17.5 we have provided data for non-contestable, regulated public lighting services
 17.6 not applicable
 17.7 not applicable
 17.8 not applicable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³ data green**; and **ESTIMATED⁴/derived data red**

MAJOR ROAD LIGHT INSTALLATION VOLUME (000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

MINOR ROAD LIGHT INSTALLATION VOLUME (000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

NUMBER OF POLES INSTALLED (000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

TOTAL COST (\$000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

MAJOR ROAD LIGHT INSTALLATION VOLUME (000'S)

- The source data was extracted from GIS system listing all billable lights on the last day of the reportable year.

MINOR ROAD LIGHT INSTALLATION VOLUME (000'S)

- The source data was extracted from GIS system listing all billable lights on the last day of the reportable year.

NUMBER OF POLES INSTALLED (000'S)

- The source data 2009-2012 was extracted from a report completed for the 2012 Annual RIN Statement – 3. Asset Installation (Table 1) Asset Age Profile for distribution system assets - Public Lighting Poles.
- The source data for 2013 was extracted from a report completed for the 2013 Annual RIN Statement – 3 Asset Installation (Table 1) Asset Age Profile for distribution system assets – Public Lighting Poles.

TOTAL COST (\$000'S)

- The source data was extracted from SAP – Finance based on function code allocation for each reportable year.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	Methodology & Assumptions
2009	<p>MAJOR ROAD LIGHT INSTALLATION VOLUME (000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition, light <i>installation on a major or minor road for the purpose of establishing new: Luminaires, including associated components such as bracket and lamp.</i> Per definition, major road lights is based on 'Cost Sharing' not equal to '1' <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Assumption made that total light installed for reported year was the net difference between the reportable year and the preceding year. Major road data available in 2008 was not consistent with following years, however the total population was consistent. By calculating the variation between 2008 and 2009 for total lights, this percentage was then used to calculate the change in Major/Minor Lights. <p>MINOR ROAD LIGHT INSTALLATION VOLUME (000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition, light <i>installation on a major or minor road for the purpose of establishing new: Luminaires, including associated components such as bracket and lamp.</i> Per definition, minor road lights is based on 'Cost Sharing' equal to '1' <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Assumption made that total light installed for reported year was the net difference between the reportable year and the preceding year. Minor road data available in 2008 was not consistent with following years, however the total population was consistent. By calculating the variation between 2008 and 2009 for total lights, this percentage was then used to calculate the change in Major/Minor Lights. <p>NUMBER OF POLES INSTALLED (000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition light installation on a major or minor road for the purpose of establishing new: Luminaires, including associated components such as bracket and lamp. The installation may also include: Poles dedicated to public lighting services. Methodology to determine number of installed poles dedicated to public lighting was achieved by subtracting the total number of dedicated public lighting poles from the previous years total. minor road lights is based on 'Cost Sharing' equal to '1' <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Assumption made that total dedicated poles is the subtraction of the previous year, however in some cases public lighting assets were permanently disconnected. Actual installation data is not available as new assets are generally installed as part of a larger project. Data provided is the only indicative detail available. <p>TOTAL COST (\$000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> This balance was extracted directly from SAP based on the identification of function codes 119 and 120 which are applicable for public lighting new installations. No assumptions required
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>MAJOR ROAD LIGHT INSTALLATION VOLUME (000'S)</p> <ul style="list-style-type: none"> Business does not currently record number of new lights installed. The only usable data available was calculating the net difference between the current reportable year and the preceding year. This is not reflective of actual new public lights, only the change from year to year. <p>MINOR ROAD LIGHT INSTALLATION VOLUME (000'S)</p> <ul style="list-style-type: none"> Business does not currently record number of new lights installed.

	<ul style="list-style-type: none"> The only usable data available was calculating the net difference between the current reportable year and the preceding year. This is not reflective of actual new public lights, only the change from year to year. <p>NUMBER OF POLES INSTALLED (000'S)</p> <ul style="list-style-type: none"> Business does not currently record number of new poles installed. The only usable data available was calculating the net difference between the current reportable year and the preceding year. This is not reflective of actual new public poles, only the change from year to year. <p>TOTAL COST (\$000'S)</p> <ul style="list-style-type: none"> Data was not estimated
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>MAJOR ROAD LIGHT INSTALLATION VOLUME (000'S)</p> <p>Approach used:</p> <ul style="list-style-type: none"> Based on total expenditure for asset category – light installation, estimation was used to establish allocation to sub-categories as actual costs were not available. Business does not retain detail of asset installations, cost allocation is completed historically to asset category with little or no detail of sub-categories. Using an estimate ensured that costs were allocated appropriately light installations. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. Volumes were not available for light installations <p>Assumptions made:</p> <ul style="list-style-type: none"> Total light installation expenditure has been allocated across sub-categories as no other further allocation was possible. <p>MINOR ROAD LIGHT INSTALLATION VOLUME (000'S)</p> <p>Approach used:</p> <ul style="list-style-type: none"> Based on total expenditure for asset category - light installation, estimation was used to establish allocation to sub-categories as actual costs were not available. Business does not retain detail of asset installations, cost allocation is completed historically to asset category with little or no detail of sub-categories. Using an estimate ensured that costs were allocated appropriately light installations. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. Volumes were not available for light installations <p>Assumptions made:</p> <ul style="list-style-type: none"> Total light installation volumes were based on net difference to the previous year as no other data was available. <p>NUMBER OF POLES INSTALLED (000'S)</p> <p>Approach used:</p> <ul style="list-style-type: none"> Based on total expenditure for asset category – light installation, estimation was used to establish allocation to sub-categories as actual costs were not available. Business does not retain detail of asset installations, cost allocation is completed historically to asset category with little or no detail of sub-categories. Using an estimate ensured that costs were allocated appropriately light installations. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Using the total asset category expenditure as the basis was the only practical way of ensuring that

	<ul style="list-style-type: none"> sub-categories reconciled to higher levels. Volumes were not available for light installations <p>Assumptions made:</p> <ul style="list-style-type: none"> Total light pole installation volumes were based on net difference to the previous year as no other data was available. <p>TOTAL COST (\$000'S)</p> <ul style="list-style-type: none"> Data was not estimated
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	No other reliable data is available for the period required.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

MAJOR ROAD LIGHT INSTALLATION VOLUME (000'S)

2009	2010	2011	2012	2013
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MINOR ROAD LIGHT INSTALLATION VOLUME (000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

NUMBER OF POLES INSTALLED (000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

TOTAL COST (\$000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.1 Public Lighting	
Table name: 4.1.2 LIGHT REPLACEMENT – VOLUME OF WORKS AND EXPENDITURE	
Asset Group	Asset Category
Public Lighting by : Asset Type; Current Year	(ALL Categories)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

17.1 CitiPower must ensure that the data provided for public lighting services reconcile to internal planning models used in generating CitiPower's proposed revenue requirements.

17.2 CitiPower is not required to distinguish expenditure for public lighting services between standard or alternative control services in regulatory template 4.1.

17.3 CitiPower is not required to distinguish expenditure for public lighting services as either capex or opex in regulatory template 4.1.

17.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.

17.5 CitiPower must report data for non-contestable, regulated public lighting services. This includes work performed by third parties on behalf of CitiPower.

17.6 CitiPower must not report data in relation to gifted assets, negotiated public lighting services or public lighting services which have been classified as contestable by the AER.

17.7 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for a public lighting service.

17.8 In the basis of preparation, CitiPower must explain how the average unit cost for public lighting services was estimated.

Definitions

Light replacement *The cost of replacement on a major or minor road of any of the following public lighting assets:*

- Luminaires
- Brackets
- Lamps
- Poles dedicated to public lighting services; and
- Underground or overhead cabling dedicated to public lighting services.

Light replacement should be estimated as the replacement of public lighting assets with their modern equivalent, where the public lighting assets have reached the end of their economic life.

Major road: *Roads on which the visual requirements of motorists are dominant (e.g. traffic routes). Typically the responsibility of a state or territory road authority.*

Minor road: *Roads on which the visual requirements of pedestrians are dominant (e.g. local roads and lighting that is applicable to areas other than roads outdoor public areas, e.g. outdoor shopping). Typically the responsibility of a local Government authority.*

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 4.1.1 Current Population of Lights by light type. We have provided data that complies with the instructions and definitions specified in the requirements of the notice as follows:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

- 17.1 the data provided for public lighting services reconcile to internal planning models
- 17.2 not applicable
- 17.3 not applicable
- 17.4 we have reported total expenditure data as a gross amount
- 17.5 we have provided data for non-contestable, regulated public lighting services
- 17.6 not applicable
- 17.7 not applicable
- 17.8 not applicable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵ data green**; and **ESTIMATED⁶/derived data red**

MAJOR ROAD LIGHT REPLACEMENT VOLUME (000'S)

2009	2010	2011	2012	2013
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MINOR ROAD LIGHT REPLACEMENT VOLUME (000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

NUMBER OF POLES REPLACED (000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

TOTAL COST (\$000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

MAJOR ROAD LIGHT REPLACEMENT VOLUME (000'S)

- The source data was extracted from the GIS system to list total number of lanterns replaced.

MINOR ROAD LIGHT REPLACEMENT VOLUME (000'S)

- The source data was extracted from the GIS system to list total number of lanterns replaced.

NUMBER OF POLES REPLACED (000'S)

- The source data was extracted from SAP for all steel poles only replaced as part of maintenance activities
- The source data for poles replaced as part of fault activities was provided by an internal spread sheet as no other method was available. Data is only available for 2012-2013.

TOTAL COST (\$000'S)

- The source data was extracted from SAP – Finance based on function code allocation for each reportable year.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

⁵ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	Methodology & Assumptions
2009	<p>MAJOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition, light replacement <i>on a major or minor road of any of the following public lighting assets:</i>• Luminaires• Brackets• Lamps Per definition, major road lights is based on 'Cost Sharing' not equal to '1' <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Actual cost of luminaire replacement is not historically available and has been calculated by assuming that only one luminaire is required for each Pole / Column : Major & Minor Replacements. Allowance made for luminaires replaced as part of other pole replacements (non steel). <p>MINOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition, light replacement <i>on a major or minor road of any of the following public lighting assets:</i>• Luminaires• Brackets• Lamps Per definition, minor road lights is based on 'Cost Sharing' equal to '1' <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Actual cost of luminaire replacement is not historically available and has been calculated by assuming that only one luminaire is required for each Pole / Column : Major & Minor Replacements. Allowance made for luminaires replaced as part of other pole replacements (non steel). <p>NUMBER OF POLES REPLACED (000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition, light replacement <i>on a major or minor road of any of the following public lighting assets:</i>• Luminaires• Brackets• Lamps • Dedicated public lighting poles Methodology to determine number of replaced poles dedicated to public lighting was achieved by total asset replacements and asset failure volumes. <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Assumption that only steel poles are dedicated to Public Lighting with regard to replacements. (Other poles dedicated to public lighting were unable to be identified.) <p>TOTAL COST (\$000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> This balance was extracted directly from SAP based on the identification of function code 140 which are applicable for public lighting new installation for public lighting replacements. No assumptions required
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>MAJOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <ul style="list-style-type: none"> Business does not currently record number of new lights replaced in the required format. <p>MINOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <ul style="list-style-type: none"> Business does not currently record number of new lights replaced in the required format <p>NUMBER OF POLES REPLACED (000'S)</p> <ul style="list-style-type: none"> Business does not currently record number of new poles replaced in the required format. <p>TOTAL COST (\$000'S)</p> <ul style="list-style-type: none"> Data was not estimated
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions
------	--

	made; and
2009	<p>MAJOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <p>Approach used:</p> <ul style="list-style-type: none"> • Based on total expenditure for asset category – light replacement, estimation was used to establish allocation to sub-categories as actual costs were not available. • Business does not retain detail of asset replacements, cost allocation is completed historically to asset category with little or no detail of sub-categories. • Using an estimate ensured that costs were allocated appropriately light replacements <p>Options considered:</p> <ul style="list-style-type: none"> • Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. • Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. • Volumes were not available for light replacements <p>Assumptions made:</p> <ul style="list-style-type: none"> • Total light replacement expenditure has been allocated across sub-categories as no other further allocation was possible. <p>MINOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <p>Approach used:</p> <ul style="list-style-type: none"> • Based on total expenditure for asset category – light replacement, estimation was used to establish allocation to sub-categories as actual costs were not available. • Business does not retain detail of asset replacements, cost allocation is completed historically to asset category with little or no detail of sub-categories. • Using an estimate ensured that costs were allocated appropriately light replacements <p>Options considered:</p> <ul style="list-style-type: none"> • Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. • Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. • Volumes were not available for light replacements <p>Assumptions made:</p> <ul style="list-style-type: none"> • Total light replacement expenditure has been allocated across sub-categories as no other further allocation was possible. <p>NUMBER OF POLES REPLACEMENT (000'S)</p> <p>Approach used:</p> <ul style="list-style-type: none"> • Based on total expenditure for asset category – light replacement, estimation was used to establish allocation to sub-categories as actual costs were not available. • Business does not retain detail of asset replacements, cost allocation is completed historically to asset category with little or no detail of sub-categories. • Data was available for pole replacements in 2013. This was used as a guide to ensure that volumes were allocated appropriately across 2009-2012. <p>Options considered:</p> <ul style="list-style-type: none"> • Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. • Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. • Data was available for pole replacements in 2013, however minimal data was available for 2009-2012. <p>Assumptions made:</p> <ul style="list-style-type: none"> • Total light replacement expenditure has been allocated across sub-categories as no other further allocation was possible. • Where data was available for pole replacements in 2012-2013, it was used as a guide for calculating volumes of poles replaced in 2009-2011. <p>TOTAL COST (\$000'S)</p> <ul style="list-style-type: none"> • Data was not estimated
2010	<p>MAJOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <ul style="list-style-type: none"> • As per 2009 <p>MINOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <ul style="list-style-type: none"> • As per 2009 <p>NUMBER OF POLES REPLACEMENT (000'S)</p>

	<p>Approach used:</p> <ul style="list-style-type: none"> • Based on total expenditure for asset category – light replacement, estimation was used to establish allocation to sub-categories as actual costs were not available. • Business does not retain detail of asset replacements, cost allocation is completed historically to asset category with little or no detail of sub-categories. • Data was available for pole replacements in 2013. This was used as a guide to ensure that volumes were allocated appropriately across 2009-2012. <p>Options considered:</p> <ul style="list-style-type: none"> • Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. • Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. • Data was available for pole replacements in 2013, however minimal data was available for 2009-2012. <p>Assumptions made:</p> <ul style="list-style-type: none"> • Total light replacement expenditure has been allocated across sub-categories as no other further allocation was possible. • Where data was available for pole replacements in 2013, it was used as a guide for calculating volumes of poles replaced in 2009-2012. <p>TOTAL COST (\$000'S)</p> <ul style="list-style-type: none"> • As per 2009
2011	<p>MAJOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <ul style="list-style-type: none"> • As per 2009 <p>MINOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <ul style="list-style-type: none"> • As per 2009 <p>NUMBER OF POLES REPLACEMENT (000'S)</p> <p>Approach used:</p> <ul style="list-style-type: none"> • Based on total expenditure for asset category – light replacement, estimation was used to establish allocation to sub-categories as actual costs were not available. • Business does not retain detail of asset replacements, cost allocation is completed historically to asset category with little or no detail of sub-categories. • Data was available for pole replacements in 2013. This was used as a guide to ensure that volumes were allocated appropriately across 2009-2012. <p>Options considered:</p> <ul style="list-style-type: none"> • Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. • Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. • Data was available for pole replacements in 2013, however minimal data was available for 2009-2012. <p>Assumptions made:</p> <ul style="list-style-type: none"> • Total light replacement expenditure has been allocated across sub-categories as no other further allocation was possible. • Where data was available for pole replacements in 2013, it was used as a guide for calculating volumes of poles replaced in 2009-2012. <p>TOTAL COST (\$000'S)</p> <ul style="list-style-type: none"> • As per 2009
2012	<p>MAJOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <ul style="list-style-type: none"> • As per 2009 <p>MINOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <ul style="list-style-type: none"> • As per 2009 <p>NUMBER OF POLES REPLACEMENT (000'S)</p> <p>Approach used:</p> <ul style="list-style-type: none"> • Based on total expenditure for asset category – light replacement, estimation was used to establish allocation to sub-categories as actual costs were not available. • Business does not retain detail of asset replacements, cost allocation is completed historically to asset category with little or no detail of sub-categories. • Data was available for pole replacements in 2013. This was used as a guide to ensure that volumes were allocated appropriately across 2009-2012. <p>Options considered:</p>

	<ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. Data was available for pole replacements in 2013, however minimal data was available for 2009-2012. <p>Assumptions made:</p> <ul style="list-style-type: none"> Total light replacement expenditure has been allocated across sub-categories as no other further allocation was possible. Where data was available for pole replacements in 2013, it was used as a guide for calculating volumes of poles replaced in 2009-2012. <p>TOTAL COST (\$000'S)</p> <ul style="list-style-type: none"> As per 2009
2013	<p>MAJOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <ul style="list-style-type: none"> As per 2009 <p>MINOR ROAD LIGHT REPLACEMENT VOLUME (000'S)</p> <ul style="list-style-type: none"> As per 2009 <p>NUMBER OF POLES REPLACEMENT (000'S)</p> <p>Approach used:</p> <ul style="list-style-type: none"> Based on total expenditure for asset category – light replacement, estimation was used to establish allocation to sub-categories as actual costs were not available. Business does not retain detail of asset replacements, cost allocation is completed historically to asset category with little or no detail of sub-categories. Data was available for pole replacements in 2013 and was used. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. Data was available for pole replacements in 2013 and was used. <p>Assumptions made:</p> <ul style="list-style-type: none"> Total light replacement expenditure has been allocated across sub-categories as no other further allocation was possible. Where data was available for pole replacements in 2013, it was used. <p>TOTAL COST (\$000'S)</p> <ul style="list-style-type: none"> As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	No other reliable data is available for the period required.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

MAJOR ROAD LIGHT REPLACEMENT VOLUME (000'S)

	2009	2010	2011	2012	2013
MINOR ROAD LIGHT REPLACEMENT VOLUME (000'S)					
	2009	2010	2011	2012	2013
NUMBER OF POLES REPLACED (000'S)					
	2009	2010	2011	2012	2013
TOTAL COST (\$000'S)					
	2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.1 Public Lighting	
Table name: 4.1.2 LIGHT MAINTENANCE – VOLUME OF WORKS AND EXPENDITURE	
Asset Group	Asset Category
Public Lighting by : Asset Type; Current Year	(ALL Categories)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

- 17.1 CitiPower must ensure that the data provided for public lighting services reconcile to internal planning models used in generating CitiPower's proposed revenue requirements.
- 17.2 CitiPower is not required to distinguish expenditure for public lighting services between standard or alternative control services in regulatory template 4.1.
- 17.3 CitiPower is not required to distinguish expenditure for public lighting services as either capex or opex in regulatory template 4.1.
- 17.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.
- 17.5 CitiPower must report data for non-contestable, regulated public lighting services. This includes work performed by third parties on behalf of CitiPower.
- 17.6 CitiPower must not report data in relation to gifted assets, negotiated public lighting services or public lighting services which have been classified as contestable by the AER.
- 17.7 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for a public lighting service.
- 17.8 In the basis of preparation, CitiPower must explain how the average unit cost for public lighting services was estimated.

Definitions

Light maintenance *The operating cost associated with the repair and inspection of the following public lighting assets on a major or minor road:*· Luminaires· Brackets· Lamps

- Poles dedicated to public lighting services; and
- Underground or overhead cabling dedicated to public lighting services.

Light maintenance should include the operational repairs and inspection of the public lighting assets, not including capital expenditure.

Major road: *Roads on which the visual requirements of motorists are dominant (e.g. traffic routes). Typically the responsibility of a state or territory road authority.*

Minor road: *Roads on which the visual requirements of pedestrians are dominant (e.g. local roads and lighting that is applicable to areas other than roads outdoor public areas, e.g. outdoor shopping). Typically the responsibility of a local Government authority.*

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 4.1.1 Current Population of Lights by light type. We have provided data that complies with the instructions and definitions specified in the requirements of the notice as follows:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

- 17.1 the data provided for public lighting services reconcile to internal planning models
- 17.2 not applicable
- 17.3 not applicable

- 17.4 we have reported total expenditure data as a gross amount
- 17.5 we have provided data for non-contestable, regulated public lighting services
- 17.6 not applicable
- 17.7 not applicable
- 17.8 not applicable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷ data green**; and **ESTIMATED⁸/derived data red**

MAJOR ROAD LIGHT REPLACEMENT VOLUME (000'S)

2009	2010	2011	2012	2013
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MINOR ROAD LIGHT REPLACEMENT VOLUME (000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

NUMBER OF POLES REPLACED (000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

TOTAL COST (\$000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

MAJOR ROAD LIGHT MAINTENANCE VOLUME (000'S)

- The source data was extracted from the PLFMS system to list total number of maintenance activities completed.

MINOR ROAD LIGHT MAINTENANCE VOLUME (000'S)

- The source data was extracted from the PLFMS system to list total number of maintenance activities completed.

NUMBER OF POLES MAINTENANCE (000'S)

- Poles are replaced as part of replacement only

TOTAL COST (\$000'S)

- The source data was extracted from SAP – Finance based on function code allocation for each reportable year.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	MAJOR ROAD LIGHT MAINTENANCE VOLUME (000'S)

⁷ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition, light maintenance on a major or minor road of any of the following public lighting assets:• Luminaires• Brackets• Lamps Per definition, major road lights is based on 'Cost Sharing' not equal to '1' <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Actual volume of luminaire maintenance has been calculated using data extracted from PLFMS <p>MINOR ROAD LIGHT MAINTENANCE VOLUME (000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition, light maintenance on a major or minor road of any of the following public lighting assets:• Luminaires• Brackets• Lamps Per definition, minor road lights is based on 'Cost Sharing' equal to '1' <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Actual volume of luminaire maintenance has been calculated using data extracted from PLFMS <p>NUMBER OF POLES MAINTENANCE (000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Poles are part of Light Replacement and not included in Light Maintenance. <p>TOTAL COST (\$000'S)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> This balance was extracted directly from SAP based on the identification of function codes 313, 380 and 450 which are applicable for public lighting maintenance. A percentage of direct costs was also allocated using total public lighting as a percentage of total expenditure. This cost allocation method was considered appropriate by the AER in the Financial RIN and is in accordance with CitiPower's cost allocation methodology. No assumptions required.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>MAJOR ROAD LIGHT MAINTENANCE VOLUME (000'S)</p> <ul style="list-style-type: none"> Business does currently record number of lights maintained however it is not complete. <p>MINOR ROAD LIGHT MAINTENANCE VOLUME (000'S)</p> <ul style="list-style-type: none"> Business does currently record number of lights maintained however it is not complete. <p>NUMBER OF POLES MAINTENANCE (000'S)</p> <ul style="list-style-type: none"> Poles are part of Light Replacement and not included in Light Maintenance. <p>TOTAL COST (\$000'S)</p> <ul style="list-style-type: none"> Data was not estimated
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>MAJOR ROAD LIGHT MAINTENANCE VOLUME (000'S)</p> <p>Approach used;</p> <ul style="list-style-type: none"> Based on total expenditure for asset category – light maintenance, estimation was used to establish allocation to sub-categories as actual costs were not available. Business does not retain detail of asset maintenance, cost allocation is completed historically to asset category with little or no detail of sub-categories. Using an estimate ensured that costs were allocated appropriately light maintenance. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not

	<p>historically been required to report on sub-category allocation.</p> <ul style="list-style-type: none"> Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. Volumes were not available for light maintenance <p>Assumptions made:</p> <ul style="list-style-type: none"> Total light maintenance expenditure has been allocated across sub-categories as no other further allocation was possible. <p>MINOR ROAD LIGHT MAINTENANCE VOLUME (000'S)</p> <p>Approach used;</p> <ul style="list-style-type: none"> Based on total expenditure for asset category – light maintenance, estimation was used to establish allocation to sub-categories as actual costs were not available. Business does not retain detail of asset maintenance, cost allocation is completed historically to asset category with little or no detail of sub-categories. Using an estimate ensured that costs were allocated appropriately light maintenance. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. Volumes were not available for light maintenance <p>Assumptions made:</p> <ul style="list-style-type: none"> Total light maintenance expenditure has been allocated across sub-categories as no other further allocation was possible. <p>NUMBER OF POLES MAINTENANCE (000'S)</p> <p>Approach used;</p> <ul style="list-style-type: none"> Poles are part of Light Replacement and not included in Light Maintenance.. <p>TOTAL COST (\$000'S)</p> <ul style="list-style-type: none"> Data was not estimated
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	No other reliable data is available for the period required.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

MAJOR ROAD LIGHT MAINTENANCE VOLUME (000'S)

2009	2010	2011	2012	2013
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MINOR ROAD LIGHT MAINTENANCE VOLUME (000'S)

2009	2010	2011	2012	2013
------	------	------	------	------

NUMBER OF POLES MAINTENANCE (000'S)

	2009	2010	2011	2012	2013
TOTAL COST (\$000'S)	2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.1 Public Lighting	
Table name: 4.1.2 Descriptor Metrics Annually	
Service/ Service Quality	Descriptor Metric
Quality of Supply	(ALL)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

17.1 CitiPower must ensure that the data provided for public lighting services reconcile to internal planning models used in generating CitiPower's proposed revenue requirements.

17.2 CitiPower is not required to distinguish expenditure for public lighting services between standard or alternative control services in regulatory template 4.1.

17.3 CitiPower is not required to distinguish expenditure for public lighting services as either capex or opex in regulatory template 4.1.

17.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.

17.5 CitiPower must report data for non-contestable, regulated public lighting services. This includes work performed by third parties on behalf of CitiPower.

17.6 CitiPower must not report data in relation to gifted assets, negotiated public lighting services or public lighting services which have been classified as contestable by the AER.

17.7 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for a public lighting service.

17.8 In the basis of preparation, CitiPower must explain how the average unit cost for public lighting services was estimated.

Definitions

Average: An arithmetic (simple) average unless a weighted average is specified.

GSL: The minimum guaranteed service level which customers are entitled to receive from distributions', as defined in each NEM jurisdiction's energy regulation, the relevant distribution determination, or the distribution's own charter.

GSL payments Voluntary or mandated payments made by DNSPs to a customer when the customer received service at a level worse than the prescribed GSL service level. DNSPs must make GSL payments in accordance with the relevant jurisdictional energy regulation.

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 4.1.2 Descriptor Metrics Annually – Quality of Supply. We have provided data that complies with the instructions and definitions specified in the requirements of the notice as follows:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

17.1 not applicable

17.2 not applicable

17.3 not applicable

17.4 not applicable

17.5 we have provided data for non-contestable, regulated public lighting services

17.6 not applicable

17.7 we have provided data for GSL's as a GSL scheme currently exists

17.8 not applicable

We have provided 'Mean days to rectify/replace public lighting assets (days)'
 We have provided 'Volume of customer complaints (0's)' that relate to public lighting.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁹ data green**; and **ESTIMATED¹⁰/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

MEAN DAYS TO RECTIFY/REPLACE PUBLIC LIGHTING ASSETS (DAYS)

- Source data was from PLFMS – Fault Lighting Reported Faults Statistics Report and recorded on the Annual RIN Statement for each reportable year.

VOLUME OF GSL BREACHES (0'S)

- Source data was from PLFMS – Fault Lighting Reported Faults Statistics Report and recorded on the Annual RIN Statement for each reportable year.

GSL PAYMENTS (\$000'S)

- Source data was from SAP – Finance report and recorded on Annual RIN Statement for each reportable year.

VOLUME OF CUSTOMER COMPLAINTS (0'S)

- Source data was from SAP – CARE System used to record customer complaints for each reportable year.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>MEAN DAYS TO RECTIFY/REPLACE PUBLIC LIGHTING ASSETS (DAYS)</p> <ul style="list-style-type: none"> • Data was available on Annual RIN Statement for each reportable year. • No other methodology or assumption was required. <p>VOLUME OF GSL BREACHES (0'S)</p> <ul style="list-style-type: none"> • Data was available on Annual RIN Statement for each reportable year. • No other methodology or assumption was required. <p>GSL PAYMENTS (\$000'S)</p> <ul style="list-style-type: none"> • Data was available on Annual RIN Statement for each reportable year. • No other methodology or assumption was required. <p>VOLUME OF CUSTOMER COMPLAINTS (0'S)</p> <ul style="list-style-type: none"> • Source data was from SAP – CARE System used to record customer complaints for each reportable year.

⁹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<ul style="list-style-type: none"> No other methodology or assumption was required.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	No estimate required
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	No estimate required
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No estimate required
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.1 Public Lighting	
Table name: 4.1.3 Cost Metrics	
Road Type	Light Type
Major Road Light Installation	(ALL)
Minor Road Light Installation	(ALL)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

17.1 CitiPower must ensure that the data provided for public lighting services reconcile to internal planning models used in generating CitiPower’s proposed revenue requirements.

17.2 CitiPower is not required to distinguish expenditure for public lighting services between standard or alternative control services in regulatory template 4.1.

17.3 CitiPower is not required to distinguish expenditure for public lighting services as either capex or opex in regulatory template 4.1.

17.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.

17.5 CitiPower must report data for non-contestable, regulated public lighting services. This includes work performed by third parties on behalf of CitiPower.

17.6 CitiPower must not report data in relation to gifted assets, negotiated public lighting services or public lighting services which have been classified as contestable by the AER.

17.7 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for a public lighting service.

17.8 In the basis of preparation, CitiPower must explain how the average unit cost for public lighting services was estimated.

Definitions

Light installation:

The installation on a major or minor road for the purpose of establishing new: Luminaires, including associated components such as bracket and lamp.

The installation may also include:

- Poles dedicated to public lighting services and
- Underground or overhead cabling dedicated to public lighting services.

Major road:

Roads on which the visual requirements of motorists are dominant (e.g. traffic routes). Typically the responsibility of a state or territory road authority.

Minor road:

Roads on which the visual requirements of pedestrians are dominant (e.g. local roads and lighting that is applicable to areas other than roads outdoor public areas, e.g. outdoor shopping). Typically the responsibility of a local Government authority.

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 4.1.3 Cost Metrics – Average Unit Cost (\$). We have provided data that complies with the instructions and definitions specified in the requirements of the notice as follows:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

- 17.1 the data provided for public lighting services reconcile to internal planning models
- 17.2 not applicable
- 17.3 not applicable
- 17.4 we have reported total expenditure data as a gross amount
- 17.5 we have provided data for non-contestable, regulated public lighting services
- 17.6 not applicable
- 17.7 not applicable
- 17.8 we have explained how the average unit cost of public lighting services was estimated.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹¹ data green**; and **ESTIMATED¹²/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

MAJOR ROAD LIGHT INSTALLATION AVERAGE UNIT COST (\$)

- The source data was extracted from GIS system listing all billable lights on the last day of the reportable year.
- Source data for financial information was provided by Finance extracted from SAP for function codes 119 & 120 that relate directly to Installation.

MINOR ROAD LIGHT INSTALLATION AVERAGE UNIT COST (\$)

- The source data was extracted from GIS system listing all billable lights on the last day of the reportable year.
- Source data for financial information was provided by Finance extracted from SAP for function codes 119 & 120 that relate directly to Installation.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	MAJOR ROAD LIGHT INSTALLATION AVERAGE UNIT COST (\$) METHODOLOGY

¹¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<ul style="list-style-type: none"> Per definition, light <i>installation on a major or minor road for the purpose of establishing new: Luminaires, including associated components such as bracket and lamp.</i> Per definition, major road lights is based on 'Cost Sharing' not equal to '1' Average cost was calculated based on the average cost of Light Replacements (actual volumes of new luminaires is unknown) <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Assumption made that total light installed for reported year was the net difference between the reportable year and the preceding year. Actual major road data was not available for the purposes of calculating an average cost. Average cost of light replacements was used. Average cost for light installation is inclusive of luminaire, bracket and lamp. Assumed that only one light was installed per bracket. <p>MINOR ROAD LIGHT INSTALLATION AVERAGE UNIT COST (\$)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition, light <i>installation on a major or minor road for the purpose of establishing new: Luminaires, including associated components such as bracket and lamp.</i> Per definition, major road lights is based on 'Cost Sharing' equal to '1' Average cost was calculated based on the average cost of light replacements (actual volumes of new luminaires is unknown) <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Assumption made that total light installed for reported year was the net difference between the reportable year and the preceding year. Actual major road data was not available for the purposes of calculating an average cost. Average cost of light replacements was used. Average cost for light installation is inclusive of luminaire, bracket and lamp. Assumed that only one light was installed per bracket.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>MAJOR ROAD LIGHT INSTALLATION AVERAGE UNIT COST (\$)</p> <ul style="list-style-type: none"> Business does not currently record number or cost of individual new lights installed. Previous project management of public lighting installations generally involved greater than one new light installed. The only usable data available was calculating the net difference between the current reportable year and the preceding year. This is not reflective of actual new public lights, only the change from year to year. This could not be used for calculation of average costs for light installation. <p>MINOR ROAD LIGHT INSTALLATION AVERAGE UNIT COST (\$)</p> <ul style="list-style-type: none"> Business does not currently record number or cost of individual new lights installed. Previous project management of public lighting installations generally involved greater than one new light installed. The only usable data available was calculating the net difference between the current reportable year and the preceding year. This is not reflective of actual new public lights, only the change from year to year. This could not be used for calculation of average costs for Light Installation.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>MAJOR ROAD LIGHT INSTALLATION AVERAGE UNIT COST (\$)</p> <p>Approach used:</p>

	<ul style="list-style-type: none"> Based on the average unit cost of Light Replacements, estimation was used to establish allocation to sub-categories as actual costs were not available. Business does not retain detail of asset installations, cost allocation is completed historically to asset category with little or no detail of sub-categories. Using an estimate ensured that costs were allocated appropriately light installations and provided an average cost. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. Volumes were not available for light installations which meant that Light Replacements had to be used for calculation of average cost. <p>Assumptions made:</p> <ul style="list-style-type: none"> Total light installation expenditure has been allocated across sub-categories as no other further allocation was possible. No allowance was made for other sub-category costs incurred. <p>MINOR ROAD LIGHT INSTALLATION AVERAGE UNIT COST (\$)</p> <p>Approach used:</p> <ul style="list-style-type: none"> Based on the average unit cost of Light Replacements, estimation was used to establish allocation to sub-categories as actual costs were not available. Business does not retain detail of asset installations, cost allocation is completed historically to asset category with little or no detail of sub-categories. Using an estimate ensured that costs were allocated appropriately light installations and provided an average cost. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. Volumes were not available for light installations which meant that Light Replacements had to be used for calculation of average cost. <p>Assumptions made:</p> <ul style="list-style-type: none"> Total light installation expenditure has been allocated across sub-categories as no other further allocation was possible. No allowance was made for other sub-category costs incurred.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other method was possible.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

<p>Response: Not Applicable</p>
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G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.1 Public Lighting	
Table name: 4.1.3 Cost Metrics	
Road Type	Light Type
Major Road Light Replacement	(ALL)
Minor Road Light Replacement	(ALL)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

17.1 CitiPower must ensure that the data provided for public lighting services reconcile to internal planning models used in generating CitiPower’s proposed revenue requirements.

17.2 CitiPower is not required to distinguish expenditure for public lighting services between standard or alternative control services in regulatory template 4.1.

17.3 CitiPower is not required to distinguish expenditure for public lighting services as either capex or opex in regulatory template 4.1.

17.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.

17.5 CitiPower must report data for non-contestable, regulated public lighting services. This includes work performed by third parties on behalf of CitiPower.

17.6 CitiPower must not report data in relation to gifted assets, negotiated public lighting services or public lighting services which have been classified as contestable by the AER.

17.7 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for a public lighting service.

17.8 In the basis of preparation, CitiPower must explain how the average unit cost for public lighting services was estimated.

Definitions

Light replacement:

The cost of replacement on a major or minor road of any of the following public lighting assets:

- Luminaires
- Brackets
- Lamps
- Poles dedicated to public lighting services; and
- Underground or overhead cabling dedicated to public lighting services.

Light replacement should be estimated as the replacement of public lighting assets with their modern equivalent, where the public lighting assets have reached the end of their economic life.

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 4.1.3 Cost Metrics – Average Unit Cost (\$). We have provided data that complies with the instructions and definitions specified in the requirements of the notice as follows:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

17.1 the data provided for public lighting services reconcile to internal planning models

17.2 not applicable

- 17.3 not applicable
- 17.4 we have reported total expenditure data as a gross amount
- 17.5 we have provided data for non-contestable, regulated public lighting services
- 17.6 not applicable
- 17.7 not applicable
- 17.8 we have explained how the average unit cost of public lighting services was estimated.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹³ data green**; and **ESTIMATED¹⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

MAJOR ROAD LIGHT REPLACEMENT AVERAGE UNIT COST (\$)

- The source data was extracted from the GIS system to list total number of lanterns replaced.
- Source data for financial information was provided by Finance extracted from SAP for function codes 140 that relate directly to Replacement.

MINOR ROAD LIGHT REPLACEMENT AVERAGE UNIT COST (\$)

- The source data was extracted from the GIS system to list total number of lanterns replaced.
- Source data for financial information was provided by Finance extracted from SAP for function codes 140 that relate directly to Replacement.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>MAJOR ROAD LIGHT REPLACEMENT AVERAGE UNIT COST (\$)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> • Per definition, light replacement on a major or minor road for the purpose of replacement of public lighting assets with their modern equivalent, where the public lighting assets have reached the end of their economic life. • Per definition, major road lights is based on 'Cost Sharing' not equal to '1' • Average cost was calculated based on the average cost of Light Replacements (both failure replacements and maintenance replacements) <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> • Assumption made that total light replacement for reported year was not historically available and

¹³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>has been calculated by assuming that only one luminaire is required for each Pole / Column : Major & Minor Replacements</p> <ul style="list-style-type: none"> Actual major road data for failure replacements was available and used, however maintenance replacement data was based on total number of steel poles replaced. Together these volumes were used to calculate an average cost. Average cost for light replacement is inclusive of luminaire and lamp. It is assumed that the bracket would be re-used. Assumed that only one light was installed per replacement, regardless of bracket used. <p>MINOR ROAD LIGHT REPLACEMENT AVERAGE UNIT COST (\$)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> Per definition, light replacement on a major or minor road for the purpose of replacement of public lighting assets with their modern equivalent, where the public lighting assets have reached the end of their economic life. Per definition, minor road lights is based on 'Cost Sharing' equal to '1' Average cost was calculated based on the average cost of Light Replacements (both failure replacements and maintenance replacements) <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> Assumption made that total light replacement for reported year was not historically available and has been calculated by assuming that only one luminaire is required for each Pole / Column : Major & Minor Replacements Actual minor road data for failure replacements was available and used, however maintenance replacement data was based on total number of steel poles replaced. Together these volumes were used to calculate an average cost. Average cost for light replacement is inclusive of luminaire and lamp. It is assumed that the bracket would be re-used. Assumed that only one light was installed per replacement, regardless of bracket used.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>MAJOR ROAD LIGHT REPLACEMENT AVERAGE UNIT COST (\$)</p> <ul style="list-style-type: none"> Business does not currently record number or cost of individual replacement lights installed. Current management of public lighting replacements required for Maintenance activities only recorded steel poles replaced. Current management of public lighting replacements required for Failure activities has detail of volumes replaced however there is no linked financial detail. <p>MINOR ROAD LIGHT REPLACEMENT AVERAGE UNIT COST (\$)</p> <ul style="list-style-type: none"> Business does not currently record number or cost of individual replacement lights installed. Current management of public lighting replacements required for Maintenance activities only recorded steel poles replaced. Current management of public lighting replacements required for Failure activities has detail of volumes replaced however there is no linked financial detail.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>MAJOR ROAD LIGHT REPLACEMENT AVERAGE UNIT COST (\$)</p> <p>Approach used:</p> <ul style="list-style-type: none"> Based on the average unit cost of Light Replacements, estimation was used to establish allocation to sub-categories as actual costs were not available.

	<ul style="list-style-type: none"> Business does not retain detail of asset replacement for maintenance activities, cost allocation is completed historically by a percentage allocation to asset category with little or no detail of sub-categories. Business does retain some detail of asset replacement for failure activities, however cost allocation is completed historically by allocation to asset category with little or no detail of sub-categories. Using an estimate ensured that costs were allocated appropriately to light replacements and provided an average cost. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. Volumes were not available for light installations which meant that Light Replacements had to be used for calculation of average cost. <p>Assumptions made:</p> <ul style="list-style-type: none"> Total light installation expenditure has been allocated across sub-categories as no other further allocation was possible. No allowance was made for other sub-category costs incurred. <p>MINOR ROAD LIGHT REPLACEMENT AVERAGE UNIT COST (\$)</p> <p>Approach used:</p> <ul style="list-style-type: none"> Based on the average unit cost of Light Replacements, estimation was used to establish allocation to sub-categories as actual costs were not available. Business does not retain detail of asset replacement for maintenance activities, cost allocation is completed historically by a percentage allocation to asset category with little or no detail of sub-categories. Business does retain some detail of asset replacement for failure activities, however cost allocation is completed historically by allocation to asset category with little or no detail of sub-categories. Using an estimate ensured that costs were allocated appropriately to light replacements and provided an average cost. <p>Options considered:</p> <ul style="list-style-type: none"> Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. Volumes were not available for light installations which meant that Light Replacements had to be used for calculation of average cost. <p>Assumptions made:</p> <ul style="list-style-type: none"> Total light installation expenditure has been allocated across sub-categories as no other further allocation was possible. No allowance was made for other sub-category costs incurred.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other method was possible.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

<p>Response: Not Applicable</p>
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G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.1 Public Lighting	
Table name: 4.1.3 Cost Metrics	
Road Type	Light Type
Major Road Light Maintenance	(ALL)
Minor Road Light Maintenance	(ALL)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

17.1 CitiPower must ensure that the data provided for public lighting services reconcile to internal planning models used in generating CitiPower’s proposed revenue requirements.

17.2 CitiPower is not required to distinguish expenditure for public lighting services between standard or alternative control services in regulatory template 4.1.

17.3 CitiPower is not required to distinguish expenditure for public lighting services as either capex or opex in regulatory template 4.1.

17.4 CitiPower must report expenditure data as a gross amount, by not subtracting customer contributions from expenditure data.

17.5 CitiPower must report data for non-contestable, regulated public lighting services. This includes work performed by third parties on behalf of CitiPower.

17.6 CitiPower must not report data in relation to gifted assets, negotiated public lighting services or public lighting services which have been classified as contestable by the AER.

17.7 CitiPower is not required to report data in respect of GSLs, where a GSL scheme does not exist for a public lighting service.

17.8 In the basis of preparation, CitiPower must explain how the average unit cost for public lighting services was estimated.

Definitions

Light maintenance:

The operating cost associated with the repair and inspection of the following public lighting assets on a major or minor road:• Luminaires• Brackets• Lamps

- Poles dedicated to public lighting services; and
- Underground or overhead cabling dedicated to public lighting services.

Light maintenance should include the operational repairs and inspection of the public lighting assets, not including capital expenditure.

Routine maintenance

Costs (opex) of recurrent/programmed activities undertaken to maintain assets, performed regardless of the condition of the asset. Costs of activities predominantly directed at discovering information on asset condition, and often undertaken at intervals that can be predicted.

Activities to maintain asset condition and/or to maintain the capacity of the distribution system to distribute electricity, and where the activities are:

- routine in nature; and
- indiscriminately carried out for a pre-defined set of assets; and
- scheduled to occur at pre-defined intervals.

May include activities to inspect, survey, audit, test, repair, alter, or reconfigure assets. A pre-defined interval may be based on the number of times the asset has operated, or any other measure, if the future timing of the maintenance

based on the measure can be predicted with a reasonable level of certainty. Excludes activities that are designed to increase or improve the capacity of the distribution system to distribute electricity, except where the increase or improvement is incidental to the Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 67 maintenance of the distribution system.

Excludes asset removal, asset replacement, new asset installation, vegetation management, and emergency response. May include:

- functional and intrusive testing of assets, including spares and equipment;
- helicopter, vehicle, and foot patrols, including negotiation of landowner access;
- asset surveys;
- environmental testing;
- painting of network assets;
- re-conductoring lines
- indoor and outdoor maintenance of substations including lawn mowing, weed control, fencing; Includes load monitoring and switching activities attributable to routine asset maintenance.

Non-routine maintenance

Costs (opex) of activities predominantly directed at managing asset condition or rectifying Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 61 defects (excluding emergency call-outs). The timing of these activities depends on asset condition and decisions on when to maintain or replace the asset, which may vary over time and across NSPs. Activities to maintain asset condition and/or to maintain the capacity of the distribution system to distribute electricity, and where the activities are not routine in nature. The non-routine activities may be undertaken in a discriminate manner for individual assets.

Excludes routine asset maintenance activities. Excludes activities that are designed to increase or improve the capacity of the distribution system to distribute electricity, except where the increase or improvement is incidental to the maintenance of the distribution system. Excludes asset removal, asset replacement, new asset installation, vegetation management, and emergency response. May include:

- activities to inspect, survey, audit, test, repair, alter, or reconfigure assets
 - functional and intrusive testing of assets, including spares and equipment;
- Includes load monitoring and switching activities attributable to non-routine asset maintenance.

Maintenance cycle:

The planned or actual duration between two consecutive maintenance works on an asset

Inspection cycle:

The planned or actual duration between two consecutive inspections of an asset

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 4.1.3 Cost Metrics – Average Unit Cost (\$). We have provided data that complies with the instructions and definitions specified in the requirements of the notice as follows:

17. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES

17.1 the data provided for public lighting services reconcile to internal planning models

17.2 not applicable

17.3 not applicable

17.4 we have reported total expenditure data as a gross amount

17.5 we have provided data for non-contestable, regulated public lighting services

17.6 not applicable

17.7 not applicable

17.8 we have explained how the average unit cost of public lighting services was estimated.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹⁵ data green**; and **ESTIMATED¹⁶/derived data red**

¹⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

ROUTINE MAINTENANCE AVERAGE UNIT COST (\$)

- The source data was extracted from GIS system via report to list total number of lanterns repaired / maintained for routine and non-routine maintenance.
- Source data for financial information was provided by Finance extracted from SAP for function codes 313, 380 & 450 that relate directly to routine and non-routine maintenance.

NON-ROUTINE MAINTENANCE AVERAGE UNIT COST (\$)

- The source data was extracted from GIS system via report to list total number of lanterns repaired / maintained for routine and non-routine maintenance.
- Source data for financial information was provided by Finance extracted from SAP for function codes 313, 380 & 450 that relate directly to routine and non-routine maintenance.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>ROUTINE MAINTENANCE AVERAGE UNIT COST (\$)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> • Per definition, light maintenance should include the operational repairs and inspection of the public lighting assets, not including capital expenditure. • Costs were allocated based on the total volume of routine maintenance based on asset category financial allocation to function code 380 (Pole Inspection) and 450 (Bulk Lamp Replacement). • Average cost was calculated based on the total expenditure for routine maintenance reported divided by the total number routine maintenance activities in each reportable year. <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> • Actual volume of luminaire routine maintenance has been calculated using data extracted from PLFMS and an allocation method for bulk lamp replacement of the total lamp population. <p>NON-ROUTINE MAINTENANCE AVERAGE UNIT COST (\$)</p> <p>METHODOLOGY</p> <ul style="list-style-type: none"> • Per definition, light maintenance should include the operational repairs and inspection of the public lighting assets, not including capital expenditure. • Costs were allocated based on the total volume of non-routine maintenance based on asset category financial allocation to function code 313 (Public Lighting Faults). • Average cost was calculated based on the total expenditure for non-routine maintenance reported divided by the total number routine maintenance activities in each reportable year. <p>ASSUMPTIONS</p> <ul style="list-style-type: none"> • Actual volume of luminaire non-routine maintenance has been calculated using data extracted from PLFMS
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<p>ROUTINE MAINTENANCE AVERAGE UNIT COST (\$)</p> <ul style="list-style-type: none"> • Business does not currently record number or cost of bulk lamp replacement or pole inspections on an individual basis. • Management of public lighting bulk lamp replacement programs are issued as a package of work based on municipality. • The only usable data available was calculating the average number of lamps replaced in a given year based on a four yearly cycle. <p>NON-ROUTINE MAINTENANCE AVERAGE UNIT COST (\$)</p> <ul style="list-style-type: none"> • Business currently records the volume of non-routine maintenance which is inclusive of all non-capital activities • Management of public lighting non-routine maintenance generally involves lamp and PE cell replacement, however other operational expenses such as faulty cables, vandalism etc. are also included
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>ROUTINE MAINTENANCE AVERAGE UNIT COST (\$)</p> <p>Approach used;</p> <ul style="list-style-type: none"> • Based on total expenditure for asset category – routine maintenance. • Business does not retain detail of routine maintenance, cost allocation is completed historically to asset category with little or no detail of sub-categories. • Using an estimate ensured that costs were allocated appropriately routine maintenance average cost. <p>Options considered:</p> <ul style="list-style-type: none"> • Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. • Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. • Volumes were not available for routine maintenance <p>Assumptions made:</p> <ul style="list-style-type: none"> • Total light maintenance expenditure has not been allocated across sub-categories as no other further allocation was possible. <p>NON-ROUTINE MAINTENANCE AVERAGE UNIT COST (\$)</p> <p>Approach used;</p> <ul style="list-style-type: none"> • Based on total expenditure for asset category – non-routine maintenance. • Business does not retain detail of asset maintenance, cost allocation is completed historically to asset category with little or no detail of sub-categories. • Using an estimate ensured that costs were allocated appropriately non-routine maintenance average cost. <p>Options considered:</p> <ul style="list-style-type: none"> • Investigation into the current asset category allocation revealed that the business has not historically been required to report on sub-category allocation. • Using the total asset category expenditure as the basis was the only practical way of ensuring that sub-categories reconciled to higher levels. • Volumes were available for non-routine maintenance, however types of activities varied greatly. <p>Assumptions made:</p> <ul style="list-style-type: none"> • Total light maintenance expenditure has not been allocated across sub-categories as no other further allocation was possible.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No other method was possible.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

4.2 Metering

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering

Table name: 4.2.1 - METERING DESCRIPTOR METRIC (All)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services. This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN as outlined in section A above. Average meter volumes in this template are calculated using audited data previously provided to the AER and excludes any contestable metering volumes and unregulated volumes.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹⁷ data green**; and **ESTIMATED¹⁸/derived data red**

¹⁷ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

All volumes are originally obtained from SAP and have been previously provided to the AER as outlined below:
2009 – 2010 – Meter population information was not requested in the Annual RINs until 2011, however the 2009 and 2010 actual volumes were reported in the Volumes template within the Audited 2011-15 AER AMI Budget Application - final decision

2011 – 2012 – Based on audited regulatory accounts, which have been derived from reports from SAP.

2013 – Based on unaudited regulatory accounts, which have been derived from reports from SAP.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Average volumes calculated using actual 2008 and 2009 closing balance volumes provided in the 2011-15 AER AMI Budget Application – Final Decision</p> <p>The meter volumes are based on the physical capability of the meter as opposed to the meter read type. This is consistent with all previously supplied and reported meter volume data e.g. Annual RIN and AMI Budget Applications.</p> <p>Almost all physical Capex is captured and reported by meter types outlined in the Category RIN, and therefore is the most accurate way to report metering costs. Any other method would involve allocations.</p> <p>If we were to classify our meter costs by the meter read type, we will have some issues such as how to allocate Meter Purchase expenditure to a meter type. Physical meter purchases are based on the physical meter capability. As it is not yet deployed it does not have a meter read type status.</p>
2010	Average volumes calculated using actual 2009 and 2010 closing balance volumes provided in the 2011-15 AER AMI Budget Application – Final Decision
2011	Average volumes calculated using actual 2010 closing balance volumes provided in the 2011-15 AER AMI Budget Application – Final Decision and the actual 2011 closing balance volumes provided in 2012 Annual RIN
2012	Average volumes calculated using actual 2011 and 2012 closing balance volumes provided in the 2012 Annual RIN
2013	Average volumes calculated using actual 2012 and 2013 closing balance volumes provided in the 2013 Annual RIN

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable

¹⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 – Cost Metrics	
Service Subcategory	Meter Type
Meter Purchase (Prescribed Metering) expenditure and volumes	METER TYPE 4 METER TYPE 5 METER TYPE 6

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services. This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN;

Meter purchase the direct material cost of purchasing the meter unit for installation or replacement. This includes the cost of delivery to CitiPower's store, including testing of equipment and inclusion of spare parts.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹⁹ data green**; and **ESTIMATED²⁰/derived data red**

¹⁹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

2009 – 2013 – Based on audited regulatory accounts derived from SAP reports.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	All meter purchase expenditure and volumes are based on the physical capability of the meter and are sourced directly from the 2009-13 annual RINs.
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. The reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

²⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 – Cost Metrics	
Service Subcategory	Meter Type
Meter Testing (Alternative Control Service and Prescribed Metering) - Expenditure and Volumes	METER TYPE 4 METER TYPE 5 METER TYPE 6

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering service. This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN

Meter testing - Routine testing, for the purposes of complying with AEMO's metrology procedure, including the ongoing and regular maintenance testing, compliance testing and in-service testing of metering installation components initiated by the responsible person or Metering Provider to fulfil their Regulatory Information Notice under Division 4 of Part 3 of the National Electricity Law 56 obligations in accordance with S7.3 of the Rules.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²¹ data green**; and **ESTIMATED²²/derived data red**

²¹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

2009-2013 – Based on audited regulatory accounts, which have been derived from reports from SAP and Meter Volumes and Dollars by Function code – Summary Report – from SAP BI Integrated Planning (IP).

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>In CitiPower’s systems, Meter Testing expenditure (as submitted in the Annual RIN’s) is not captured by meter type categories specified within the Category RIN. Therefore these costs were allocated to a meter type based on a number of assumptions as follows:</p> <p>Cost and volume allocations</p> <p>Conducted regardless of the meter type. Allocated using the average cumulative population of type 4,5 and 6 meters installed as per table 4.2.1.</p> <p><u>Code Test D/C meter Single Phase</u> - allocated to type 5 & 6 meter types using the average cumulative single phase meter population in table 4.2.1.</p> <p><u>Code Test CT meter</u> - allocated to type 5 & 6 meter types using the average cumulative population of CT connected meters in table 4.2.1.</p> <p><u>Code Test D/C meter Poly Phase</u> allocated to type 5 & 6 meter types using the average cumulative population of CT connected meters in table 4.2.1.</p> <p><u>Code Test Current Transformers (Set of 3)</u> – conducted regardless of the meter type. Allocated using the average cumulative population of type 4,5 and 6 meters installed as per table 4.2.1.</p>
2010	<p>Cost and volume allocations</p> <p>Conducted regardless of the meter type. Allocated using the average cumulative population of type 4,5 and 6 meters installed as per table 4.2.1.</p> <p><u>Code Test D/C meter Single Phase</u> - allocated to type 5 & 6 meter types using the average cumulative single phase meter population in table 4.2.1.</p> <p><u>Code Test CT meter</u> - allocated to type 5 & 6 meter types using the average cumulative population of CT connected meters in table 4.2.1.</p> <p><u>Code Test D/C meter Poly Phase</u> - allocated to type 5 & 6 meter types using the average cumulative population of CT connected meters in table 4.2.1.</p> <p><u>Code Test Current Transformers (Set of 3)</u> – conducted regardless of the meter type. Allocated using the cumulative average population of type 4,5 and 6 meters installed as per table 4.2.1</p>

²² “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

2011	<p>Cost and volume allocations</p> <p><u>CT Meter Inspection</u> This activity ceased as type 5 & 6 meters began to be replaced with new type 4 meters, therefore any testing was conducted on type 4 meters.</p> <p><u>Code Test D/C meter Single Phase</u> - This activity ceased on type 5& 6 meters as the population began to be replaced with new type 4 meters (includes data validation testing).</p> <p><u>Code Test CT meter</u> - allocated to type 5 & 6 meter types using the average cumulative population of CT connected meters in table 4.2.1.</p> <p><u>Code Test D/C meter Poly Phase</u> This activity ceased on type 5& 6 meters as the population began to be replaced with new type 4 meters (includes data validation testing).</p> <p><u>Code Test Current Transformers (Set of 3)</u> – conducted regardless of the meter type. Allocated using the average cumulative population of type 4,5 and 6 meters installed as per table 4.2.1</p>
2012	<p>Cost and volume allocations</p> <p><u>CT Meter Inspection</u> – This activity ceased as type 5 & 6 meters began to be replaced with new type 4 meters; therefore any testing was conducted on type 4 meters.</p> <p><u>Code Test D/C meter Single Phase</u> - This activity ceased on type 5& 6 meters as the population began to be replaced with new type 4 meters (includes data validation testing).</p> <p><u>Code Test CT meter</u> - This activity ceased on type 5& 6 meters as the population began to be replaced with new type 4 meters (includes data validation testing).</p> <p><u>Code Test D/C meter Poly Phase</u> - This activity ceased on type 5& 6 meters as the population began to be replaced with new type 4 meters (includes data validation testing).</p> <p><u>Code Test Current Transformers (Set of 3)</u> – conducted regardless of the meter type. Allocated using the average cumulative population of type 4,5 and 6 meters installed as per table 4.2.1</p>
2013	<p>Cost and volume allocations</p> <p><u>CT Meter Inspection</u> – This activity ceased as type 5 & 6 meters began to be replaced with new type 4 meters; therefore any testing was conducted on type 4 meters.</p> <p><u>Code Test D/C meter Single Phase</u> - This activity ceased on type 5& 6 meters as the population began to be replaced with new type 4 meters (includes data validation testing).</p> <p><u>Code Test CT meter</u> - This activity ceased on type 5& 6 meters as the population began to be replaced with new type 4 meters (includes data validation testing).</p> <p><u>Code Test D/C meter Poly Phase</u> - This activity ceased on type 5& 6 meters as the population began to be replaced with new type 4 meters (includes data validation testing).</p> <p><u>Code Test Current Transformers (Set of 3)</u> – conducted regardless of the meter type. Allocated using the average cumulative population of type 4,5 and 6 meters installed as per table 4.2.1</p>

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Testing costs are not captured by Type 4-6 meter types in CitiPower's systems
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	In most cases, the average meter population volumes reported in table 4.2.1 is used to allocate

	meter testing costs to a meter type (outlined in section D). These assumptions have been validated by subject matter experts responsible for meter testing within the business.
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Meter population data provides a reasonable basis for allocation of the meter testing volumes and expenditure. Type 5 & 6 meters ceased to be tested during the AMI rollout program as meters were scheduled to be replaced in the near future. Therefore all meter testing volumes and expenditure (where appropriate) was allocated to type 4 meters and also included data validation/testing.
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 – Cost Metrics	
Service Subcategory	Meter Type
Meter Investigation (Alternative Control Service and Prescribed Metering) - Expenditure & Volumes	METER TYPE 4 METER TYPE 5 METER TYPE 6

H. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

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16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN, including both company initiated back-office, and site investigations and customer requested investigations, excluding any activity deemed to be contestable by the AER.

Meter investigation The cost to investigate a metering request at a given supply point i.e. Interval data analysis; meter malfunction; wiring transposition (polarity) investigation; contestable metering investigation and meter tampering or bypass.

I. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²³ data green**; and **ESTIMATED²⁴/derived data red**

²³ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the

2009	2010	2011	2012	2013
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J. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

2009-2013 – Based on audited regulatory accounts, which have been derived from reports from SAP and Meter Volumes and Dollars by Function code – Summary Report – from SAP BI Integrated Planning (IP).

K. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>In CitiPower's systems, Meter Investigation expenditure (as submitted in the Annual RIN's) is not captured by meter type categories specified within the Category RIN. Therefore these costs were allocated to a meter type based on a number of assumptions as follows:</p> <p>Cost and volume allocations <u>Back-office investigations</u> - costs allocated using the cumulative average population of type 4, 5 and 6 meters installed as per table 4.2.1. The volumes are based on hours spent on investigations.</p>
2010	<p>Cost and volume allocations <u>back-office investigations</u> - costs allocated using the average cumulative population of type 4,5 and 6 meters installed as per table 4.2.1. The volumes are based on hours spent on investigations.</p> <p><u>on-site investigations</u> - allocated using the average population of type 4, 5 and 6 meters installed as per table 4.2.1. Volumes are captured as actual physical site visits.</p>
2011	<p>Cost and volume allocations <u>back-office investigations</u> - costs allocated using the average cumulative population of type 4, 5 and 6 meters installed as per table 4.2.1. The volumes are based on hours spent on investigations.</p> <p><u>on-site investigations</u> - allocated using the average population of type 4, 5 and 6 meters installed as per table 4.2.1. Volumes are captured as actual physical site visits.</p> <p><u>customer requested investigations</u> - allocated using the average population of type 4, 5 and 6 meters installed as per table 4.2.1. Volumes are captured as actual physical site visits.</p>
2012	<p>Cost and volume allocations <u>back-office investigations</u> - costs allocated using the average cumulative population of type 4, 5 and 6 meters installed as per table 4.2.1. The volumes are based on hours spent on investigations.</p> <p><u>on-site investigations</u> - allocated using the average population of type 4, 5 and 6 meters installed as per table 4.2.1. Volumes are captured as actual physical site visits.</p> <p><u>customer requested investigations</u> - allocated using the average population of type 4, 5 and 6 meters</p>

purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	installed as per table 4.2.1. Volumes are captured as actual physical site visits.
2013	<p>Cost and volume allocations</p> <p><u>back-office investigations</u> - costs allocated using the average cumulative population of type 4, 5 and 6 meters installed as per table 4.2.1. The volumes are based on hours spent on investigations.</p> <p><u>on-site investigations</u> - allocated using the average population of type 4, 5 and 6 meters installed as per table 4.2.1. Volumes are captured as actual physical site visits.</p> <p><u>logging-work</u> – (minimal cost) 100% related to and allocated to type 6 meters.</p> <p><u>customer requested investigations</u> - allocated using the average population of type 4, 5 and 6 meters installed as per table 4.2.1. Volumes are captured as actual physical site visits.</p>

L. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Meter investigation costs and volumes are not captured by Type4-6 meter types in CitiPower's systems therefore requiring some estimated form of allocation
2010	ibid
2011	ibid
2012	ibid
2013	ibid

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	In most cases, the average meter population volumes reported in table 4.2.1 is used to allocate meter investigation costs to a meter type (outlined in section D). These assumptions have been validated by SMEs responsible for meter investigation within the business.
2010	ibid
2011	ibid
2012	ibid
2013	ibid

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Meter population data provides a reasonable basis for allocation of meter investigation volumes and expenditure.
2010	ibid
2011	ibid
2012	ibid
2013	ibid

M. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

N. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 – Cost Metrics	
Service Subcategory	Meter Type
Scheduled Meter Reading (Prescribed Metering) - Volumes and Expenditure	METER TYPE 4 METER TYPE 5 METER TYPE 6

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services. This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN;

Scheduled Meter Reading The scheduled collection of energy data from a metering installation on a cycle that equates to the end-use customer's billing cycle, usually monthly or quarterly.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁵ data green**; and **ESTIMATED²⁶/derived data red**

²⁵ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Expenditure:

2009 – 2013 –Meter Data Services (MDS) Expenditure is based on audited regulatory accounts, which have been derived from SAP reports.

Volumes:

obtained from CISOV and have been previously provided to the AER as outlined below:

2009 – 2010: Based on audited 2011-15 AER AMI Budget Application - final decision. Meter read type information was not requested in the Annual RINs until 2011, however the 2009 and 2010 actual read type volumes were reported in the Volumes template within the Audited 2011-15 AER AMI Budget Application - final decision

2011 – 2012: Based on volumes reported in the audited regulatory accounts (AMI template), which have been derived from reports from CISOV.

2013: Based on volumes reported in the audited regulatory accounts,(AMI template) which have been derived from reports from CISOV.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Average annual meter read type volumes are calculated using previously reported meter read type information from either the audited Annual RINS or the Audited Budget application that contained 2008-10 actual meter read type volumes. The average annual volume of meters by read type is converted into an estimated number of meter reads by multiplying quarterly read meters by 4 and monthly read meters by 12. Total Scheduled meter reading costs as reported in the annual RINs is allocated to a meter type using the estimated meter read volumes.
2010	Please refer to 2009
2011	Please refer to 2009
2012	Please refer to 2009
2013	Please refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Scheduled read volumes and expenditure is not captured by meter type in our systems and therefore needs to be estimated.
2010	Ibid
2011	Ibid
2012	Ibid

accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2013	Ibid
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Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Refer to comments made under section D
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Estimating meter read volumes and using this to allocate expenditure to meter types is considered to be an efficient and effective method proving good representation of actual costs incurred by meter type.
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 – Cost Metrics	
Service Subcategory	Meter Type
Special Meter Reading (Alternative Control Service) - Volumes and Expenditure.	METER TYPE 4 METER TYPE 5 METER TYPE 6

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services . This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN.

Special meter reading: An actual *meter reading* performed to support an out of cycle customer billing or consumption request.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁷ data green**; and **ESTIMATED²⁸/derived data red**

²⁷ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data for period from 2009 to 2013 was obtained from the relevant general ledgers within SAP

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Direct costs (includes Re-Energisation De-Energisation, Special Read) were derived from the escalated 2008 Corporate Management fee including margin. The total direct costs were proportioned between Re-En De-En and Special Read based on the percentage of volume of each service to the total revenue volume which we billed to the customers. Indirect costs were determined by proportion of Corporate Overheads and Depreciation allocated to this service.
2010	Direct costs (includes Re-Energisation De-Energisation Special Read) were derived from the escalated 2008 Corporate Management fee including margin. The total direct costs were proportioned between Re-En De-En and Special Read based on the percentage of volume of each service to the total revenue volume which we billed to the customers. Indirect costs were determined by proportion of Corporate Overheads and Depreciation allocated to this service.
2011	Direct costs (includes Re-Energisation De-Energisation, Special Read) were derived from escalated 2008 Corporate Management fee including margin . The total direct costs were proportioned between Re-Energisation De-Energisation and Special Read based on the percentage of volume of each service to the total revenue volume which we billed to the customers. Indirect costs were determined by proportion of Corporate Overheads allocated to this service.
2012	Direct costs (includes Manual and Remote Re-Energisation De-Energisation, Special Read) were derived from total costs captured within specific areas of SAP, proportioned between Manual and Remote Re-Energisation De-Energisation and Special Read based on the percentage of volume of each service to the total revenue volume which we billed to the customers. Indirect costs were determined by proportion of Corporate Overheads allocated to this service.
2013	Refer 2012

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Internal Corporate Overheads not allocated directly to each individual Service Type. As Corporate Overheads are applicable to all Service types, a method of allocation is required to fully capture service type costs.
2010	Ibid
2011	Ibid
2012	Internal Corporate Overheads not allocated directly to each individual Service Type. As Corporate Overheads are applicable to all Service types, a method of allocation is required to fully capture service type

²⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	costs.
2013	Refer 2013

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Proportion of Corporate overheads allocated to this service is determined by percentage of this service costs to the total ACS activity costs. The AMI meter program commenced in 2009, however it was not until the middle of 2012 when remote special meter read capabilities were fully available and the required systems and process were in place. Therefore total 2009 special meter reading expenditure is allocated to meter types using the cumulative average meter population from table 4.2.1.
2010	The AMI meter program commenced in 2009, however it was not until the middle of 2012 when remote special meter read capabilities were fully available and the required systems and process were in place. Therefore total 2010 special meter reading expenditure is allocated to meter types using the cumulative average meter population from table 4.2.1.
2011	The AMI meter program commenced in 2009, however it was not until the middle of 2012 when remote special meter read capabilities were fully available and the required systems and process were in place. Therefore total 2011 special meter reading expenditure is allocated to meter types using the cumulative average meter population from table 4.2.1.
2012	From 2012, Type 4 meters became capable of completing special readings remotely as systems and processes were implemented. Special Meter Reading expenditure was therefore allocated to a meter type using the annual meter read type closing balances, excluding remotely read type 4 meters (as the manual read/site visit cost was no longer applicable).
2013	From 2012, Type 4 meters became capable of completing special readings remotely as systems and processes were implemented. Special Meter Reading expenditure was therefore allocated to a meter type using the annual meter read type closing balances, excluding remotely read type 4 meters (as the manual read/site visit cost was no longer applicable).

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	It is the only reasonable and reliable allocation basis available
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 – Cost Metrics	
Service Subcategory	Meter Type
New Meter Installation (Alternative Control Service) - Volumes and Expenditure.	METER TYPE 4 METER TYPE 5 METER TYPE 6

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16. METERING ALTERNATIVE CONTROL SERVICES

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services. This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN.

Connections expenditure- The costs to establish new connection assets and upgrades to existing connections assets necessary to meet customer connection requests. This excludes alterations to existing connection assets.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁹ data green**; and **ESTIMATED³⁰/derived data red**

²⁹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

2009-13 Based on audited regulatory accounts, which have been derived from reports from SAP, SAP, Meter Volumes and Dollars by Function code – Summary Report – from SAP BI Integrated Planning (IP) and SAP Business Intelligence (BI) - Operating Expenditure reports.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	In accordance to the definition of connections expenditure- the New Connections (NC) expenditure is inclusive of all costs associated with installing a new connection to a premise, corporate management fee and overheads and margins associated with providing these services. New Connection labour/installation volumes and costs are recorded by the three meter types (as specified in the Category RIN) in CitiPower's systems, and aligns to previously provided data including the audited Annual RINs. All new meter installation expenditure and volumes are based on the physical capability of the meter and physically allocated to meter types this was in the Category RIN.
2010	Please refer to 2009.
2011	Please refer to 2009. Includes an adjustment to subtract out an adjustment for remote energisation which is separately disclosed.
2012	Please refer to 2011.
2013	Please refer to 2012.

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<ul style="list-style-type: none"> - Total margin and overhead costs for New Connections are pooled together and allocated by direct costs splits, as these costs not directly applied to the service types. - Internal Management Fee not allocated directly to each individual Service Type (i.e. NC). As Management Fee is applicable to all Service types, a method of allocation is required to fully capture service type costs.
2010	See explanation for 2009.
2011	See explanation for 2009.
2012	See explanation for 2009.
2013	See explanation for 2009.

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
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accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2009	<ul style="list-style-type: none"> - Total margin and overhead costs for New Connections are pooled together and allocated by direct costs splits, as these costs not directly applied to the service types. - Internal management fee has been allocated also on a pro-rata basis based on Total Alternate Control Services expenditure.
2010	See explanation for 2009.
2011	See explanation for 2009.
2012	See explanation for 2009.
2013	See explanation for 2009.

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	This was seen as the most appropriate allocation methodology for allocating these types of costs.
2010	See explanation for 2009.
2011	See explanation for 2009.
2012	See explanation for 2009.
2013	See explanation for 2009.

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 – Cost Metrics	
Service Subcategory	Meter Type
Meter Replacement (Alternative Control Service and Prescribed Metering) - Expenditure and Volumes	METER TYPE 4 METER TYPE 5 METER TYPE 6

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services. This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN. It contains both prescribed metering and ACS costs reconciling with amounts reported in the 2009-13 annual RINs

Meter Replacement The replacement cost of a meter and associated equipment at a site with existing metering infrastructure. This activity should be estimated as the replacement of a meter with its modern equivalent, where the meter has reached the end of its economic life. Replacement is a non-demand driven activity where the existing asset cannot be efficiently maintained to meet its service performance requirement.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³¹ data green**; and **ESTIMATED³²/derived data red**

³¹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

2009-2013 – Based on audited regulatory accounts, which have been derived from a report from SAP Business Intelligence (BI) - Meter Volumes and Dollars by Function Code – Summary Report.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>In CitiPower’s systems, Meter Replacement expenditure and volumes (as submitted in the Annual RIN’s) is captured by meter type categories specified within the Category RIN. Details of the expenditure/volumes recorded here are as follows:</p> <ul style="list-style-type: none"> • includes the labour/installation cost; • excludes the meter purchase expenditure as this is already captured under service sub category Meter Purchase. • includes any associated meter material costs other than the meter • includes meter fault replacements, company and customer initiated meter replacements (including AMI rollout expenditure/volumes) <p>Expenditure and volumes are allocated to a meter type based on the physical capability of the meter, not the meter read type.</p>
2010	Ibid
2011	Also Includes AMI Bring Forward replacements. Amounts reported here reconcile to amounts reported in the annual RIN. As this relates 100% to type 4 metering, no estimates are required.
2012	Ibid
2013	Ibid

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable

purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2013	Not Applicable
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Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 Cost Metrics	
Service Subcategory	Meter Type
Meter Maintenance (Prescribed Metering) - Volumes and Expenditure	METER TYPE 4 METER TYPE 5 METER TYPE 6

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Meter maintenance

The cost to repair a meter currently deployed in the field. Meter maintenance costs should include the expenditure related to operational repairs of the meter unit, not including capex.

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services. This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN as meters are generally not repaired as they are either covered by warranty (2009-13) or replaced with a new meter that is deemed to be capex and intended to be excluded

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³³ data green**; and **ESTIMATED³⁴/derived data red**

³³ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

2009 – 2013: No costs have been reported under Meter Maintenance.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Meter Faults are reported under meter replacements, as they are a physical meter replacement. The meters are under a 5 year warranty period and any faulty meters will be sent back to the vendor. The age of >95% the existing meter population is <=5 years old. Faulty meters are therefore not repaired they are replaced with a new meter and treated as CAPEX. The removed meters are sent back to the meter vendors, then returned to stores and redeployed.
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable

accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 Cost Metrics	
Service Subcategory	Meter Type
Remote Meter Reading (Prescribed Metering) - Volumes and Expenditure	METER TYPE 4

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services . This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Please provide a Response in this box:

We confirm that the data provided complies with the instructions and definitions specified in the CA RIN.

Remote meter reading: The use of remotely read interval metering infrastructure to perform meter reading and special meter reading.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁵ data green**; and **ESTIMATED³⁶/derived data red**

³⁵ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data is consistent with volumes previously supplied to the AER as either part of the AMI Budget Application or the Annual RINs sourced from SAP.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Volumes: represents the average meters read remotely as per 2011-15 AMI Budget Application AER Final Determination or the annual RIN as opposed to the number of remote reads as the meters are read 4 time per day.</p> <p>Cost: Expenditure reported/allocated here reconciles back to the MDS expenditure reported in the Annual RINs (total scheduled meter reading and remote meter reading). Includes Meter Reading, back-office and any direct AMI Program costs. A proportion of these costs are allocated to type 4 meters based on the population of meters being read as type 4. Again, where a physically installed type 4 meter was being read as a type 5 or a type 6 is not included in these costs; these costs are included under category: Scheduled Meter Reading.</p>
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Opex Costs are not captured by meter type category in our systems like CAPEX and therefore estimates are required to allocate these costs and volumes to meter types.
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	A proportion of indirect costs has been allocated based on the proportion of meters being read remotely. Any cost associated to direct resources engaged on the AMI Program (recorded and identifiable) to deal with Type 4 meter MDS issues was allocated 100% to Type 4 metering.
2010	Ibid

³⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2011	Ibid
2012	Ibid
2013	Ibid

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Meter read type population by meter Type is a simple and efficient method to allocate costs.
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 Cost Metrics	
Service Subcategory	Meter Type
Remote Meter Re-Configuration (Alternative Control Service) - Expenditure and Volumes	METER TYPE 4

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services. This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Please provide a Response in this box:

We confirm that the data provided complies with the instructions and definitions specified in the CA RIN.

Remote meter configuration: A change to the software in the meter that enables changes to parameters for a specific meter function. Examples of meter reconfigurations may include:

- changing the switching times for controlled loads
- changes associated with the installation of embedded generation and/or the premium feed-in tariff

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁷ data green**; and **ESTIMATED³⁸/derived data red**

³⁷ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

³⁸ ‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data for period from 2011 to 2013 was obtained from the relevant general ledgers within SAP

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not applicable
2010	Not applicable
2011	Direct costs were determined by revenue volumes which we billed to the customers multiplied by unit rate which includes average internal labour costs based on Motion study. These costs are wholly relating to Type 4 meters. Amounts reported here reconcile with amounts reported within the annual RIN
2012	Refer 2011
2013	Refer 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	As total costs associated with this service were not captured separately, a unit rate is required to calculate the associated costs.
2012	Refer 2011
2013	Refer 2011

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Unit rate was derived based on average amount of time taken to perform each task of the service multiplied by internal labour rate.
2012	Refer 2011
2013	Refer 2011

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable

accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2010	Not applicable
2011	It is the only reasonable and reliable allocation basis available
2012	Refer 2011
2013	Refer 2011

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: type 4 meters only capable of performing remote re-configurations from 2011 in line with the AMI program deliverables.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 Cost Metrics	
Service Subcategory	Meter Type
Other Metering (Alternative Control Service and Prescribed Metering) - Expenditure	METER TYPE 4 METER TYPE 5 METER TYPE 6 METER TYPE 7

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services. This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN.

Other costs (metering) - The costs of performing metering services which are not already included in the following meter services:

- Meter purchase
- Meter testing
- Meter investigation
- Scheduled meter reading
- Special meter reading
- New meter installation
- Meter replacement
- Meter maintenance

Costs for meter data services, which apply to meter types 4–7 should be reported in the meter associated works category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁹ data green**; and **ESTIMATED⁴⁰/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

2009-13 – Based on audited regulatory accounts, which have been derived from reports from SAP Business Intelligence (BI) Depreciation report and SAP BI Capital report.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	In CitiPower’s systems, there are a small number of Operating expenditure (Opex) items that do not fit into the required categories in table 4.2.2. These costs as reported in the Annual RIN’s however are not captured by meter type categories used within the Category RIN. In 2009, AMI project management fees (\$12M) were treated as operating expenditure (OPEX) within the 2009 annual RIN. From 2010 when meters and communication devices were rolled out, project management cost were capitalised, becoming part of the metering RAB. All of the 2009 cost relates to the AMI project and is therefore allocated to type 4 metering.
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Other costs are easily identifiable and previously reported within the annual RINs. These costs are not however recorded by meter type and therefore an estimate is required to report them this way.
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

³⁹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁴⁰ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<ul style="list-style-type: none"> - Costs identifiable as AMI project related were allocated 100% to type 4 metering and any indirect costs were allocated using the cumulative meter population. - Project management costs are allocated 100% to type 4 metering as they relate to the AMI program. <p>Cost reported as "other metering" mostly relates to:</p> <ul style="list-style-type: none"> - Type 7 Unmetered Supply Audits (UMS) – 100% of the expenditure/volumes relates to type 7 meters
2010	<p>Cost reported as "other metering" mostly relates to:</p> <ul style="list-style-type: none"> • Meter Program and/or Time-switch resets – 100% Type 6 meters – meter time-switch resets • Type 7 Unmetered Supply Audits (UMS) – 100% of the expenditure/volumes relates to type 7 meters
2011	<p>Cost reported as "other metering" mostly relates to:</p> <ul style="list-style-type: none"> • Meter Program and/or Time-switch resets – 100% Type 6 meters – meter time-switch resets • Type 7 Unmetered Supply Audits (UMS) – 100% of the expenditure/volumes relates to type 7 meters
2012	<p>Cost reported as "other metering" mostly relates to:</p> <ul style="list-style-type: none"> • Type 5 & 6 (Non AMI) meter stock write-off as per AMI OIC - allocated using average Type 5-6 meter population in table 4.2.1 • Meter Program and/or Time-switch resets – 100% Type 4 meters – meter reprogramming/resets
2013	<p>Cost reported as "other metering" mostly relates to:</p> <ul style="list-style-type: none"> • Company Initiated Meter Replacements or Abolishment's (non-customer requested activity) – allocated using average Type 4-6 meter population in table 4.2.1 • Meter Program and/or Time-switch resets – 100% Type 4 meters – meter reprogramming/resets

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	This was seen as the most appropriate allocation methodology for allocating these types of costs.
2010	Ibid
2011	Ibid
2012	Ibid
2013	Ibid

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 Cost Metrics	
Service Subcategory	Meter Type
IT Infrastructure Capex (\$000's)	Meter Type 4

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16. METERING ALTERNATIVE CONTROL SERVICES

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services. This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Meter type 4 Remotely read interval meter with communications functionality that is:

- designed to transmit metering data to a remote location for data collection; and
- does not, at any time, require the presence of a person at, or near, the meter for the purposes of data collection or data verification (whether this occurs manually as a walk-by reading or through the use of a vehicle as a close proximity drive-by reading), including, but not limited to, an interval meter that transmits metering data via direct dialup, satellite, the internet, general packet radio service, power line carrier, or any other equivalent technology.

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN

Non-network IT & Communications Expenditure

Is all non-network expenditure directly attributable to IT and communications assets including replacement, installation, operation, maintenance, licensing, and leasing costs but excluding all costs associated with SCADA and Network Control Expenditure that exist beyond gateway devices (routers, bridges etc.) at corporate offices.

IT & Communications Expenditure includes:

- costs associated with SCADA and Network Control that exist at the Corporate office side of gateway devices (routers, bridges etc.). For example, this would include cost associated with SCADA master systems/control room and directly related equipment

- IT & Communications Expenditure related to management, dispatching and coordination, etc. of network work crews (e.g. phones, radios etc.).
- any common costs shared between the SCADA and Network Control Expenditure and IT & Communications

Expenditure categories with no dominant driver related to either of these expenditure categories. For example, a dedicated communications link used for both corporate office communications and network data communications with no dominant driver for incurring the expenditure attributable to either expenditure category should be reported as IT & Communications Expenditure.

- expenditure related to network metering recording and storage at non network sites (i.e. corporate offices/sites)
- Sub categories of Non-network IT& Communications Expenditure are:
 - Client Devices Expenditure
 - Recurrent Expenditure (excluding any client devices expenditure)
 - Non-Recurrent Expenditure (excluding any client devices expenditure).

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴¹ data green**; and **ESTIMATED⁴²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

All data from Business Intelligence reports containing Data form SAP reconciling to amounts reported in the Annual RINs

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	For CAPEX we have used BI Capital report for functions codes 205 (IT METERING ASSETS). All amounts in this BI report sourced from SAP are related to type 4 IT system development as part of the AMI program.
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

⁴¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 Cost Metrics	
Service Subcategory	Meter Type
IT Infrastructure Opex (\$000's)	Meter Type 4

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16. METERING ALTERNATIVE CONTROL SERVICES

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services. This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria..

Meter type 4 Remotely read interval meter with communications functionality that is:

- designed to transmit metering data to a remote location for data collection; and
- does not, at any time, require the presence of a person at, or near, the meter for the purposes of data collection or data verification (whether this occurs manually as a walk-by reading or through the use of a vehicle as a close proximity drive-by reading), including, but not limited to, an interval meter that transmits metering data via direct dialup, satellite, the internet, general packet radio service, power line carrier, or any other equivalent technology.

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN
Non-network IT & Communications Expenditure

Is all non-network expenditure directly attributable to IT and communications assets including replacement, installation, operation, maintenance, licensing, and leasing costs but excluding all costs associated with SCADA and Network Control Expenditure that exist beyond gateway devices (routers, bridges etc.) at corporate offices.

IT & Communications Expenditure includes:

- costs associated with SCADA and Network Control that exist at the Corporate office side of gateway devices (routers, bridges etc.). For example, this would include cost associated with SCADA master systems/control room and directly related equipment
- IT & Communications Expenditure related to management, dispatching and coordination, etc. of network work crews (e.g. phones, radios etc.).
- any common costs shared between the SCADA and Network Control Expenditure and IT & Communications

Expenditure categories with no dominant driver related to either of these expenditure categories. For example, a dedicated communications link used for both corporate office communications and network data communications with no dominant driver for incurring the expenditure attributable to either expenditure category should be reported as IT & Communications Expenditure.

- expenditure related to network metering recording and storage at non network sites (i.e. corporate offices/sites)
- Sub categories of Non-network IT& Communications Expenditure are:
- Client Devices Expenditure
- Recurrent Expenditure (excluding any client devices expenditure)
- Non-Recurrent Expenditure (excluding any client devices expenditure).

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴³ data green**; and **ESTIMATED⁴⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

All data from SAP, Business Intelligence and Integrated planning reports reconciling to amounts reported in the Annual RINs

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	For OPEX we have used SAP, Business Intelligence and Integrated planning reports . All costs in these reports show IT opex expenditure relating to the AMI program which is 100% type 4 related.
2010	See 2009
2011	See 2009
2012	See 2009
2013	See 2009

⁴³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 Cost Metrics	
Service Subcategory	Meter Type
Communications Infrastructure (CAPEX)	Meter Type 4

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services . This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN.

Non-network IT & Communications Expenditure

Is all non-network expenditure directly attributable to IT and communications assets including replacement, installation, operation, maintenance, licensing, and leasing costs but excluding all costs associated with SCADA and Network Control Expenditure that exist beyond gateway devices (routers, bridges etc.) at corporate offices.

IT & Communications Expenditure includes:

- costs associated with SCADA and Network Control that exist at the Corporate office side of gateway devices (routers, bridges etc.). For example, this would include cost associated with SCADA master systems/control room and directly related equipment
- IT & Communications Expenditure related to management, dispatching and coordination, etc. of network work crews (e.g. phones, radios etc.).
- any common costs shared between the SCADA and Network Control Expenditure and IT & Communications

Expenditure categories with no dominant driver related to either of these expenditure categories. For example, a dedicated communications link used for both corporate office communications and network data communications with no dominant driver for incurring the expenditure attributable to either expenditure category should be reported as IT & Communications Expenditure.

- expenditure related to network metering recording and storage at non network sites (i.e. corporate offices/sites)

- Sub categories of Non-network IT& Communications Expenditure are:
- Client Devices Expenditure
- Recurrent Expenditure (excluding any client devices expenditure)
- Non-Recurrent Expenditure (excluding any client devices expenditure).

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁵ data green**; and **ESTIMATED⁴⁶/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

2009 – 2013 – Based on audited regulatory accounts, which have been derived from reports from SAP and Meter Volumes and Dollars – Summary Report – from SAP BI Integrated Planning (IP).

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Metering related communications Infrastructure cost is separately reported in SAP. Costs reported here relate to Mesh communications devices including access points and relays used to remotely read type 4 AMI Meters. Amounts reported here reconcile with the amounts reported in the annual RINs
2010	Please refer to 2009
2011	Please refer to 2009
2012	Please refer to 2009
2013	Please refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable

⁴⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.2 Metering	
Table name: 4.2.2 Cost Metrics	
Service Subcategory	Meter Type
Communications Infrastructure OPEX (Prescribed Metering)	Meter Type 4

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

16.1 CitiPower must ensure that the data provided for metering services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

16.2 CitiPower is not required to distinguish expenditure for metering services between standard or alternative control services in regulatory template 4.2.

16.3 CitiPower is not required to distinguish expenditure for metering services as either capex or opex in regulatory template 4.2.

16.4 CitiPower must report data for non-contestable, regulated metering services . This includes work performed by third parties on behalf of CitiPower.

16.5 CitiPower must not report data in relation to metering services which have been classified as contestable by the AER.

16.6 For guidance, the definition of meter type 4 is provided in appendix F. This will include metering assets and services such as those introduced with the Advanced Metering Infrastructure rollout in Victoria.

Please provide a Response in this box:

This template is compliant to the definitions specified in the CA RIN - we have prepared the template in line with the definitions below:

Non-network IT & Communications Expenditure

Is all non-network expenditure directly attributable to IT and communications assets including replacement, installation, operation, maintenance, licensing, and leasing costs but excluding all costs associated with SCADA and Network Control Expenditure that exist beyond gateway devices (routers, bridges etc.) at corporate offices.

IT & Communications Expenditure includes:

- costs associated with SCADA and Network Control that exist at the Corporate office side of gateway devices (routers, bridges etc.). For example, this would include cost associated with SCADA master systems/control room and directly related equipment
- expenditure related to network metering recording and storage at non network sites (i.e. corporate offices/sites)

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁷ data green**; and **ESTIMATED⁴⁸/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

2009 – 2013 – Based on audited regulatory accounts, which have been derived from reports from SAP and Meter Volumes and Dollars – Summary Report – from SAP BI Integrated Planning (IP).

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Metering related communications Infrastructure cost is separately reported in SAP. Costs reported here relate to the communications backhaul costs to remotely read type 4 AMI Meters. Costs specifically relate to using Telstra’s 3G networks to transfer data from the ~800 access points back to the company’s systems. Amounts reported here reconcile with amounts reported within the annual RINs
2010	Please refer to 2009
2011	Please refer to 2009
2012	Please refer to 2009
2013	Please refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable

⁴⁷ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁴⁸ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

4.3 Ancillary Services – Fee-based Services

AER CATEGORY ANALYSIS RIN

Tab name: 4.3 Ancillary Services - Fee-based Services	
Table name: 4.3.1 Cost Metrics for fee-based services	
Service	Service Subcategory
Common Fee-based Services	Energisation

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>“Appendix E: Principles and Requirements”</p> <p>15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES</p> <p>15.1 CitiPower must ensure that the data provided for fee-based and quoted services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>15.2 In regulatory templates 4.3 and 4.4, CitiPower must list all the fee-based and quoted services that were listed in the annual tariff proposal of each relevant year.</p> <p>15.3 In the basis of preparation, CitiPower must provide a description of each fee-based and quoted service listed in regulatory templates 4.3 and 4.4. In each services’ description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.</p> <p>15.4 CitiPower is not required to distinguish expenditure for fee-based and quoted services between standard or alternative control services in regulatory templates 4.3 and 4.4.</p> <p>15.5 CitiPower is not required to distinguish expenditure for fee-based and quoted services as either capex or opex in regulatory templates 4.3 and 4.4.</p> <p>“Appendix F: Definitions”</p> <ul style="list-style-type: none"> · Energisation: The closing of a connection in order to allow the flow of energy to the premises.
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<p>Please provide a Response in this box:</p> <p>The information provided complies with section 15 of Appendix E, and aligns with the definitions provided in Appendix F.</p>
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B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁹ data green**; and **ESTIMATED⁵⁰/derived data red**

2009	2010	2011	2012	2013
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⁴⁹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁵⁰ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data for period from 2009 to 2013 was obtained from the relevant general ledgers within SAP

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable (CitiPower did not provide this service)
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable (CitiPower did not provide this service)
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable (CitiPower did not provide this service)
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable (CitiPower did not provide this service)
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

CitiPower did not provide Energisation services.

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G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.3 Ancillary services – Fee-based services	
Table name: 4.3.1 - Cost Metrics for Fee – Based Services	
SERVICE	SERVICE SUBCATEGORY
COMMON FEE-BASED SERVICES	De-Energisation

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

15.1 CitiPower must ensure that the data provided for fee-based and quoted services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

15.2 In regulatory templates 4.3 and 4.4, CitiPower must list all the fee-based and quoted services that were listed in the annual tariff proposal of each relevant year.

15.3 In the basis of preparation, CitiPower must provide a description of each fee-based and quoted service listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.

15.4 CitiPower is not required to distinguish expenditure for fee-based and quoted services between standard or alternative control services in regulatory templates 4.3 and 4.4.

15.5 CitiPower is not required to distinguish expenditure for fee-based and quoted services as either capex or opex in regulatory templates 4.3 and 4.4.

Common fee-based services

Those fee-based services which are provided by all DNSPs, including:

- Energisation
- De-energisation
- Re-energisation

“Appendix F: Definitions”

De-energisation: The opening of a connection in order to prevent the flow of energy to the premises.

Please provide a Response in this box:

CitiPower applies a Disconnection (includes Disconnections for Non Payment (DNP)) charge when a request is received to disconnect at a supply point. The service requires that all supply assets remain at the customer's installation. If at the time of disconnection it is discovered that the installation has been damaged or is defective and will be unsafe to energise if a future reconnection occurs, other charges to correct the defect may be applicable. These charges will be based on the nature of the works required.

In a normal instance a de-energisation is performed by a special reader. However, there are scenarios where a Service Truck Visit may be required in its place and accordingly a Service Truck Visit (Section D.1.3.1) charge will be applied.

The information provided complies with section 15 of Appendix E, and aligns with the definitions provided in Appendix F.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵¹ data green**; and **ESTIMATED⁵²/derived data red**

Expenditure

2009	2010	2011	2012	2013
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Volume

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data for period from 2009 to 2013 was obtained from the relevant general ledgers within SAP

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Expenditure: Direct costs (includes Re-En De-En, Special Read) were derived from 2008 Corporate Overheads. These costs were proportioned between Re-En De-En and Special Read based on the percentage of volume of each service to the total volume which we billed to the customers. Indirect costs were determined by proportion of Corporate Overheads and Depreciation allocated to this service.</p> <p>Volume: Volume information has been extracted directly from SAP</p>
2010	Refer to 2009
2011	Refer to 2009
2012	<p>Total costs are comprised of:</p> <ul style="list-style-type: none"> Corporate Overheads related to Special Readings, allocated based on revenue split between Re-Energisation, De-Energisation and Special Reads, based on the assumption that the revenue split is reflective of the underlying costs of performing the services. <p>Corporate overheads indirectly allocated based on expenditure, under the assumption that Corporate Overheads are incurred at the same rate as Expenditure.</p>
2013	Refer 2012

⁵¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Internal Corporate Overheads not allocated directly to each individual Service Type. As Corporate Overheads are applicable to all Service types, a method of allocation is required to fully capture service type costs.
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Proportion of Corporate overheads allocated to this service is determined by percentage of this service costs to the Total Alternate Control Services expenditure, based on the assumption that Corporate Overheads are incurred at the same rate as service costs.
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The estimate was seen as being the most reflective of costs incurred.
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.3 Ancillary services – Fee-based services	
Table name: 4.3.1 - Cost Metrics for Fee – Based Services	
SERVICE	SERVICE SUBCATEGORY
COMMON FEE-BASED SERVICES	Re-Energisation

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

15.1 CitiPower must ensure that the data provided for fee-based and quoted services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

15.2 In regulatory templates 4.3 and 4.4, CitiPower must list all the fee-based and quoted services that were listed in the annual tariff proposal of each relevant year.

15.3 In the basis of preparation, CitiPower must provide a description of each fee-based and quoted service listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.

15.4 CitiPower is not required to distinguish expenditure for fee-based and quoted services between standard or alternative control services in regulatory templates 4.3 and 4.4.

15.5 CitiPower is not required to distinguish expenditure for fee-based and quoted services as either capex or opex in regulatory templates 4.3 and 4.4.

Common fee-based services

Those fee-based services which are provided by all DNSPs, including:

- Energisation
- De-energisation
- Re-energisation

“Appendix F: Definitions”

Re-energisation: The *energisation* of a premises after their *de-energisation*. Does not include alterations or new installation of meters or services.

Please provide a Response in this box:

CitiPower applies an Energisation charge when customers moving into an existing premise where supply assets are installed and the site was previously de-energised.

Three options for energisation are available:

1. Reconnections (same day) business hours only;
2. Reconnections (incl. Customer Transfer) business hours; and
3. Reconnections (incl. Customer Transfer) after hours.

The information provided complies with section 15 of Appendix E, and aligns with the definitions provided in Appendix F.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵³ data green**; and **ESTIMATED⁵⁴/derived data red**

Expenditure

2009	2010	2011	2012	2013
------	------	------	------	------

Volume

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Expenditure and volume data for period from 2009 to 2013 was obtained from the relevant general ledgers within SAP

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Expenditure Direct costs (includes Re-En De-En, Special Read) were derived from 2008 Corporate Overheads. These costs were proportioned between Re-En De-En and Special Read based on the percentage of volume of each service to the total volume which we billed to the customers. Indirect costs were determined by proportion of Corporate Overheads and Depreciation allocated to this service.</p> <p>Volume: Volume information has been extracted directly from SAP</p>
2010	Refer to 2009
2011	Refer to 2009
2012	<p>Total costs are comprised of:</p> <ul style="list-style-type: none"> Corporate Overheads related to Special Readings, allocated based on revenue split between Re-Energisation, De-Energisation and Special Reads, based on the assumption that the revenue split is reflective of the underlying costs of performing the services. <p>Corporate overheads indirectly allocated based on expenditure, under the assumption that Corporate Overheads are incurred at the same rate as Expenditure.</p>
2013	Refer 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

⁵³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Internal Corporate Overheads not allocated directly to each individual Service Type. As Corporate Overheads are applicable to all Service types, a method of allocation is required to fully capture service type costs.
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Proportion of Corporate overheads allocated to this service is determined by percentage of this service costs to the Total Alternate Control Services expenditure.
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	It is the only reasonable and reliable allocation basis available
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.3 Ancillary services – Fee-based services	
Table name: 4.3.1 - Cost Metrics for Fee – Based Services	
SERVICE	SERVICE SUBCATEGORY
MISCELLANEOUS FEE-BASED SERVICES	PV Installation

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>“Appendix E: Principles and Requirements”</p> <p>15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES</p> <p>15.1 CitiPower must ensure that the data provided for fee-based and quoted services reconciles to internal planning models used in generating CitiPower’s proposed revenue requirements.</p> <p>15.2 In regulatory templates 4.3 and 4.4, CitiPower must list all the fee-based and quoted services that were listed in the annual tariff proposal of each relevant year.</p> <p>15.3 In the basis of preparation, CitiPower must provide a description of each fee-based and quoted service listed in regulatory templates 4.3 and 4.4. In each services’ description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.</p> <p>15.4 CitiPower is not required to distinguish expenditure for fee-based and quoted services between standard or alternative control services in regulatory templates 4.3 and 4.4.</p> <p>15.5 CitiPower is not required to distinguish expenditure for fee-based and quoted services as either capex or opex in regulatory templates 4.3 and 4.4.</p> <p>“Appendix F: Definitions”</p> <p>Fee-based services</p> <p>Fee-based services are provided for the benefit of individual customers rather than uniformly supplied to all network customers. Some services of this type are homogenous in nature and scope. This means that these services are provided on a fixed fee basis.</p> <p>These services may, in some jurisdictions, be classified as ancillary network services charged on a fixed fee basis.</p>

<p>Please provide a Response in this box:</p> <p>CitiPower applies the PV Installation charge when prior to connection of small scale embedded generation to CitiPower’s network. This charge specifically covers the inspection of the customer’s site to ensure safe connection to the network and includes anti-islanding test.</p> <p>The information provided complies with section 15 of Appendix E, and aligns with the definitions provided in Appendix F.</p>

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁵ data green**; and **ESTIMATED⁵⁶/derived data red**

⁵⁵ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the

Expenditure

2009	2010	2011	2012	2013
------	------	------	------	------

Volume

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Expenditure and volume data for period from 2011 to 2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	<p>Expenditure The SAP financial system is used to extract the information required to state the PV Installation information by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments in accordance with the cost allocation methodology.</p> <p>Volumes Volume information has been extracted directly from SAP</p>
2012	Refer 2011
2013	Refer 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	No estimated data.
2012	Refer 2011
2013	Refer 2011

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable

accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2011	No estimated data.
2012	Refer 2011
2013	Refer 2011

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	No estimated data.
2012	Refer 2011
2013	Refer 2011

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: No service provided for PV for year 2009 and 2010.
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G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.3 Ancillary services – Fee-based services	
Table name: 4.3.1 - Cost Metrics for Fee – Based Services	
SERVICE	SERVICE SUBCATEGORY
MISCELLANEOUS FEE-BASED SERVICES	Remote De-Energisation

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>“Appendix E: Principles and Requirements”</p> <p>15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES</p> <p>15.1 CitiPower must ensure that the data provided for fee-based and quoted services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>15.2 In regulatory templates 4.3 and 4.4, CitiPower must list all the fee-based and quoted services that were listed in the annual tariff proposal of each relevant year.</p> <p>15.3 In the basis of preparation, CitiPower must provide a description of each fee-based and quoted service listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.</p> <p>15.4 CitiPower is not required to distinguish expenditure for fee-based and quoted services between standard or alternative control services in regulatory templates 4.3 and 4.4.</p> <p>15.5 CitiPower is not required to distinguish expenditure for fee-based and quoted services as either capex or opex in regulatory templates 4.3 and 4.4.</p> <p>“Appendix F: Definitions”</p> <p>Common fee-based services</p> <p>Those fee-based services which are provided by all DNSPs, including:</p> <ul style="list-style-type: none"> · Energisation · De-energisation · Re-energisation
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<p>Please provide a Response in this box:</p> <p>CitiPower applies the Remote De-energisation charge when a request is received to de-energise a customer that has smart metering and related infrastructure is in place. Remote de-energisation is defined as the use of the AMI/smart metering infrastructure communications system to control a supply contactor inside the meter such that the customer is disconnected from the DNSP's network (also referred to as 'disconnection')</p> <p>The information provided complies with section 15 of Appendix E, and aligns with the definitions provided in Appendix F.</p>
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B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁷ data green**; and **ESTIMATED⁵⁸/derived data red**

⁵⁷ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the

Expenditure

2009	2010	2011	2012	2013
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Volume

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Expenditure and volume data for period from 2012 to 2013 was obtained from the relevant general ledgers within SAP

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	<p>Expenditure Direct costs (includes Manual and Remote Re-En De-En, Special Read) were derived from total costs captured within specific areas of SAP, proportioned between Manual and Remote Re-En De-En and Special Read based on the percentage of volume of each service to the total revenue volume which we billed to the customers.</p> <p>Volume: Volume information has been extracted directly from SAP</p>
2013	Refer 2012

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	As individual service volume was not captured separately, a method of allocation is required to proportion the total costs between Manual and Remote Re-En De-En and Special Read services.
2013	Refer 2012

purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Allocation method used to proportion the total costs was based on the percentage of volume of each service to the total volume which we billed to the customers, based on the assumption that the proportion of volume is reflective of the proportion of costs incurred.
2013	Refer 2012

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	It is the estimate that is most reflective of how costs are incurred.
2013	Refer 2012

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No service provided for Remote De-Energisation for period from 2009 to 2011.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.3 Ancillary services – Fee-based services	
Table name: 4.3.1 - Cost Metrics for Fee – Based Services	
SERVICE	SERVICE SUBCATEGORY
MISCELLANEOUS FEE-BASED SERVICES	Remote Re-Energisation

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

<p>“Appendix E: Principles and Requirements”</p> <p>15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES</p> <p>15.1 CitiPower must ensure that the data provided for fee-based and quoted services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.</p> <p>15.2 In regulatory templates 4.3 and 4.4, CitiPower must list all the fee-based and quoted services that were listed in the annual tariff proposal of each relevant year.</p> <p>15.3 In the basis of preparation, CitiPower must provide a description of each fee-based and quoted service listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.</p> <p>15.4 CitiPower is not required to distinguish expenditure for fee-based and quoted services between standard or alternative control services in regulatory templates 4.3 and 4.4.</p> <p>15.5 CitiPower is not required to distinguish expenditure for fee-based and quoted services as either capex or opex in regulatory templates 4.3 and 4.4.</p> <p>“Appendix F: Definitions”</p> <p>Common fee-based services</p> <p>Those fee-based services which are provided by all DNSPs, including:</p> <ul style="list-style-type: none"> · Energisation · De-energisation · Re-energisation
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<p>Please provide a Response in this box:</p> <p>CitiPower applies the Remote Re-energisation charge when a request is received to re-energise a customer that has smart metering and related infrastructure is in place. Remote re-energisation is defined as the use of the AMI/smart metering infrastructure communications system to control a supply contactor inside the meter such that the customer is connected to the DNSP's network (also referred to as 'connection').</p> <p>The information provided complies with section 15 of Appendix E, and aligns with the definitions provided in Appendix F.</p>

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁹ data green**; and **ESTIMATED⁶⁰/derived data red**

⁵⁹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the

Expenditure

2009	2010	2011	2012	2013
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Volume

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Expenditure and volume data for period from 2012 to 2013 was obtained from the relevant general ledgers within SAP

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Direct costs (includes Manual and Remote Re-En De-En, Special Read) were derived from total costs captured within specific areas of SAP, proportioned between Manual and Remote Re-En De-En and Special Read based on the percentage of volume of each service to the total revenue volume which we billed to the customers. Volume: Volume information has been extracted directly from SAP
2013	Refer 2012

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	As individual service volume was not captured separately, a method of allocation is required to proportion the total costs between Manual and Remote Re-En De-En and Special Read services.
2013	Refer 2012

purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Allocation method used to proportion the total costs was based on the percentage of volume of each service to the total volume which we billed to the customers based on the assumption that the proportion of volume is reflective of the proportion of costs incurred..
2013	Refer 2012

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	It is the estimate that is most reflective of how costs are incurred.
2013	Refer 2012

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No service provided for Remote Re-Energisation for period from 2009 to 2011.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.3 Ancillary Services - Fee-based Services	
Table name: 4.3.1 Cost Metrics for fee-based services	
Service	Service Subcategory
Miscellaneous Fee-based Services	Wasted Truck Visits

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Miscellaneous fee-based services - Those fee-based services that are provided by some but not all DNSPs. This would include, among other services, service truck visits and wasted service truck visits.

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

15.1 CitiPower must ensure that the data provided for *fee-based* and *quoted services* reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

15.2 In *regulatory templates* 4.3 and 4.4, CitiPower must list all the *fee-based* and *quoted services* that were listed in the annual tariff proposal of each relevant year.

15.3 In the basis of preparation, CitiPower must provide a description of each *fee-based* and *quoted service* listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service

Please provide a Response in this box:

Wasted truck visits are where CitiPower receives a request for a service truck and:

- the crew arrives to find the site is not ready for the scheduled work within 15 minutes of arriving;
- the truck attendance is no longer required once on site; or
- 24 hours notice is not provided for a cancellation;

Then a Wasted Truck Visit charge will apply.

Once the site is ready for the Service Truck Visit another appointment needs to be booked and the normal Service Truck Visit charge applies.

Business hours and after hours charges apply where appropriate.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶¹ data green**; and **ESTIMATED⁶²/derived data red**

⁶¹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

Expenditure

2009	2010	2011	2012	2013
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Volumes

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data for period from 2009 to 2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower. The original volume related data was sourced from CISOV.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	<p>Expenditure: The SAP financial system is used to extract the information required to state the DNSP Wasted Truck visit information by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments in accordance with the cost allocation methodology.</p> <p>Volumes Volumes extracted directly from CIS-OV</p>
2012	Refer 2011
2013	Refer 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable

⁶² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No information was collated for Wasted Truck in 2009 and 2010. Wasted Truck Expenditure is not expected to trend consistently, therefore using 2011-2013 data as a basis of estimate for 2009 and 2010 would not provide information that reflects the costs incurred. No other reasonable basis of estimation was identified.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.3 Ancillary Services - Fee-based Services	
Table name: 4.3.1 Cost Metrics for fee-based services	
Service	Service Subcategory
Miscellaneous Fee-based Services	Wasted Truck Visits

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Miscellaneous fee-based services - Those fee-based services that are provided by some but not all DNSPs. This would include, among other services, service truck visits and wasted service truck visits.

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

15.1 CitiPower must ensure that the data provided for *fee-based* and *quoted services* reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

15.2 In *regulatory templates* 4.3 and 4.4, CitiPower must list all the *fee-based* and *quoted services* that were listed in the annual tariff proposal of each relevant year.

15.3 In the basis of preparation, CitiPower must provide a description of each *fee-based* and *quoted service* listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service

Please provide a Response in this box:

Wasted truck visits are where CitiPower receives a request for a service truck and:

- the crew arrives to find the site is not ready for the scheduled work within 15 minutes of arriving;
- the truck attendance is no longer required once on site; or
- 24 hours notice is not provided for a cancellation;

Then a Wasted Truck Visit charge will apply.

Once the site is ready for the Service Truck Visit another appointment needs to be booked and the normal Service Truck Visit charge applies.

Business hours and after hours charges apply where appropriate.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶³ data green**; and **ESTIMATED⁶⁴/derived data red**

⁶³ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

Expenditure

2009	2010	2011	2012	2013
------	------	------	------	------

Volumes

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data for period from 2009 to 2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower. The original volume related data was sourced from CISOV.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	<p>Expenditure: The SAP financial system is used to extract the information required to state the DNSP Wasted Truck visit information by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments in accordance with the cost allocation methodology.</p> <p>Volumes Volumes extracted directly from CIS-OV</p>
2012	Refer 2011
2013	Refer 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable

⁶⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No information was collated for Wasted Truck in 2009 and 2010. Wasted Truck Expenditure is not expected to trend consistently, therefore using 2011-2013 data as a basis of estimate for 2009 and 2010 would not provide information that reflects the costs incurred. No other reasonable basis of estimation was identified.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.3 Ancillary Services - Fee-based Services	
Table name: 4.3.1 Cost Metrics for fee-based services	
Service	Service Subcategory
Miscellaneous Fee-based Services	Reserve Feeder

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

- 15.1 CitiPower must ensure that the data provided for fee-based and quoted services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 15.2 In regulatory templates 4.3 and 4.4, CitiPower must list all the fee-based and quoted services that were listed in the annual tariff proposal of each relevant year.
- 15.3 In the basis of preparation, CitiPower must provide a description of each fee-based and quoted service listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.
- 15.4 CitiPower is not required to distinguish expenditure for fee-based and quoted services between standard or alternative control services in regulatory templates 4.3 and 4.4.
- 15.5 CitiPower is not required to distinguish expenditure for fee-based and quoted services as either capex or opex in regulatory templates 4.3 and 4.4.

Please provide a Response in this box:

Complied with Quoted services requirements as per the Notice Appendix E section 15. Reserve Feeder service is negotiated with customers specifically requesting continuity of electricity supply should the feeder providing normal supply to their connection experience interruption.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶⁵ data green**; and **ESTIMATED⁶⁶/derived data red**

Expenditure

2009	2010	2011	2012	2013
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⁶⁵ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁶⁶ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

Volume

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

CISO\ Billing system – Search based on contracts NMI (National Metering Identifier) to provide tariff information
 Marginal cost of reinforcement analysis – customer contribution model based on an approved 2010 sample of completed projects expenditure and adjusted for CPI

Maintenance expenditure – from the annual RIN submission which is sourced from BI

RAB replacement value – taken from 2004 RAB uplifted for CPI

Volume figures obtained from CISO\

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Expenditure Apply a marginal cost of reinforcement to the total demand of Kilo Volt Amps (kva's) for reserve feeder contracts to calculate a total reinforcement cost. Then apply the maintenance percentage which is calculated by taking current years maintenance expenditure divided by the current years RAB adjusted for CPI.</p> <p>Volume Volume information is based on the number of customer contracts obtained directly from CISO\</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Need to calculate the maintenance on reserve feeders and as actual maintenance is not recorded down to the asset level only a % can be applied to the total reinforcement costs of current reserve feeder contracts.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Apply a marginal cost of reinforcement to the total demand of kva's for reserve feeder contracts to calculate a total reinforcement cost. Then apply the maintenance percentage which is calculated by taking current years maintenance expenditure divided by the current years RAB replacement value adjusted for CPI. This is under the assumption that the maintenance percentage applied to the replacement cost will represent the operating and maintenance expenditure for reserve feeder.
2010	As per 2009
2011	As per 2009

2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Require an estimate of the maintenance value but as we don't record actual maintenance down to the asset level, the data is based on an estimate. By applying a maintenance percentage to the replacement value it best represents the level of maintenance expenditure incurred for reserve feeders as this service is similar to other feeders.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

4.4 Ancillary Services – Quoted Services

AER CATEGORY ANALYSIS RIN

Tab name: 4.4 Ancillary Services - Quoted Services	
Table name: 4.4.1 - COST METRICS FOR QUOTED SERVICES	
Service	Service Subcategory
Quoted Services	Recoverable Works – Expenditure and Volumes

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

- 15.1 CitiPower must ensure that the data provided for *fee-based* and *quoted services* reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 15.2 In *regulatory templates* 4.3 and 4.4, CitiPower must list all the *fee-based* and *quoted services* that were listed in the annual tariff proposal of each relevant year.
- 15.3 In the basis of preparation, CitiPower must provide a description of each *fee-based* and *quoted service* listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.
- 15.4 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* between *standard* or *alternative control services* in *regulatory templates* 4.3 and 4.4.
- 15.5 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* as either *capex* or *opex* in *regulatory templates* 4.3 and 4.4.

Response:	
15.1	Not applicable to CitiPower as per AER advice
15.2	Not applicable. Recoverable Works was standard control under G14
15.3	Complies
15.4	Complies
15.5	Complies – Recoverable works was capex under G14

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶⁷ data green**; and **ESTIMATED⁶⁸/derived data red**

Expenditure

2009	2010	2011	2012	2013
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⁶⁷ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Volumes

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report will need to be provided.

Response: Source expenditure was from the Regulatory RIN for 2009 to 2013. The source average unit price was from SAP Business Intelligence report for Customer Projects. The volume was estimated from the combination of the total expenditure and unit price.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<ol style="list-style-type: none"> 1. Recoverable works (asset relocations) is the work completed by CitiPower following a customer request to alter or rearrange the distribution assets. This work is not normally part of a supply project where an electricity supply is made available to a customer. 2. CitiPower function codes 116 relates to customer requests for recoverable works including asset relocations. 3. The Regulatory RIN report was used for the direct expenditure for the years 2009 to 2013 for function code 116. 4. The SAP CPM BI report provided average direct costs of completed projects within function code 116 for the years 2009 to 2013. Note this does not include capture of all projects so is a sample only. Percentage capture of the total reported regulation RIN was considered to be a fair indication of the average cost per project. 5. The average unit cost from the SAP CPM Business Intelligence report have been used to calculate the number of physicals required to align with the regulation RIN expenditure.
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	The RIN expenditure does not contain the number of physicals only expenditure. Not all projects are captured in the CPM Business Intelligence report so the number of physicals has to be estimated to align with the reported RIN
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	See D
2010	See D

2011	See D
2012	See D
2013	See D

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	The estimate for volumes used actual source data therefore the calculation was considered the best estimate
2010	Refer to 2009
2011	Refer to 2009
2012	Refer to 2009
2013	Refer to 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

Expenditure	2009	2010	2011	2012	2013
Volumes	2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.4 Ancillary Services - Quoted Services	
Table name: 4.4.1 - COST METRICS FOR QUOTED SERVICES	
Service	Service Subcategory
Quoted Services	Emergency Recoverable Works

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of Notice in this box:

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

- 15.1 CitiPower must ensure that the data provided for *fee-based* and *quoted services* reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 15.2 In *regulatory templates* 4.3 and 4.4, CitiPower must list all the *fee-based* and *quoted services* that were listed in the annual tariff proposal of each relevant year.
- 15.3 In the basis of preparation, CitiPower must provide a description of each *fee-based* and *quoted service* listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.
- 15.4 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* between *standard* or *alternative control services* in *regulatory templates* 4.3 and 4.4.
- 15.5 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* as either *capex* or *opex* in *regulatory templates* 4.3 and 4.4.

Please provide a Response in this box:

Complied with Quoted services requirements as per the Notice Appendix E section 15. Emergency Recoverable Works is a quoted service that may be applied to recover the costs associated with works that are required to restore CitiPower's distribution network to its standard operating level following an incident caused by an identifiable 3rd party.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶⁹ data green**; and **ESTIMATED⁷⁰/derived data red**

⁶⁹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Expenditure

2009	2010	2011	2012	2013
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Volume

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Expenditure – customer orders booked to SAP expenditure function code 146 as per the RIN submission
 Volumes – based on the number of orders in expenditure

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	Expenditure is based on actual data sourced from SAP. Volumes have been defined as the number of customer orders received in SAP expenditure function code 146.
2012	As per 2011
2013	As per 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Since data for volumes has not been captured it is assumed that the best estimate of volumes is by using the number of customer orders per SAP expenditure function code 146.
2012	As per 2011
2013	As per 2011

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	The assumption that the number of customer orders received in expenditure best represents the volumes of Emergency Recoverable Works because the expenditure account is used solely for this service and expenditure is recorded against individual order numbers for each customer.
2012	As per 2011
2013	As per 2011

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable

2011	The assumption that the number of customer orders received in expenditure best represents the volumes of Emergency Recoverable Works because the expenditure account is used solely for this service.
2012	As per 2011
2013	As per 2011

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

In 2009-2010 Emergency Recoverable data was captured under Batons/Shutdown/Electrical Inspect/Meter Test & Recovery in line with previous reporting requirements to the AER under p 15.1 and 15.2 of the RIN. These years have been reported separately in the RIN templates under Batons/Shutdowns.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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*orange - Complex

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.4 Ancillary Services - Quoted Services	
Table name: 4.4.1 Cost Metrics for quoted services	
Service	Service Subcategory
Quoted Services	ACS After Hours (AH) Service Truck

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Quoted services

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

15.1 CitiPower must ensure that the data provided for fee-based and quoted services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

15.2 In regulatory templates 4.3 and 4.4, CitiPower must list all the fee-based and quoted services that were listed in the annual tariff proposal of each relevant year.

15.3 In the basis of preparation, CitiPower must provide a description of each fee-based and quoted service listed in regulatory templates 4.3 and 4.4. In each service's description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.

15.4 CitiPower is not required to distinguish expenditure for fee-based and quoted services between standard or alternative control services in regulatory templates 4.3 and 4.4.

15.5 CitiPower is not required to distinguish expenditure for fee-based and quoted services as either capex or opex in regulatory templates 4.3 and 4.4.

Please provide a Response in this box:

After Hours Service truck visit is a service which attracts a Quoted Service charge. The charge is applied to larger scale works requiring an after-hours service truck appointment longer than 1 hour in duration. Examples of types of work include:

- Disconnection of complex site (refer section D.1.1.3)
- Reconnection of complex site (refer section D.1.1.4)
- Metering Additions or Alternations
- Shutdowns (includes preparation works).

The information provided in the template complies with the requirements of the Category Analysis RIN Notice (CA RIN)

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷¹ data green**; and **ESTIMATED⁷²/derived data red**

⁷¹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

⁷² ‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data for quoted services and cost allocations for the years 2011-2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower. The original volume related data was sourced from CISOV.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not applicable
2010	Not applicable
2011	Volume information has been extracted directly from SAP The SAP financial system is used to extract the information required to state the DNSP After Hours Service Truck information by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments in accordance with the cost allocation methodology.
2012	Refer 2011
2013	Refer 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Year	3. The reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No information was collated for After Hours Service Truck visits in 2009 and 2010.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.4 Ancillary Services - Quoted Services	
Table name: 4.4.1 Cost Metrics for quoted services	
Service	Service Subcategory
Quoted Services	ACS Supply Abolishment

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Quoted services

Quoted Services are services for which costs are recovered through quoted prices as the nature and scope of these services are specific to individual customers' needs and vary from customer to customer. These services may, in some jurisdictions, be classified as ancillary network services charged on a quoted basis.

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

15.1 CitiPower must ensure that the data provided for fee-based and quoted services reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.

15.2 In regulatory templates 4.3 and 4.4, CitiPower must list all the fee-based and quoted services that were listed in the annual tariff proposal of each relevant year.

15.3 In the basis of preparation, CitiPower must provide a description of each fee-based and quoted service listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.

15.4 CitiPower is not required to distinguish expenditure for fee-based and quoted services between standard or alternative control services in regulatory templates 4.3 and 4.4.

15.5 CitiPower is not required to distinguish expenditure for fee-based and quoted services as either capex or opex in regulatory templates 4.3 and 4.4.

Please provide a Response in this box:

A Quoted Service charge is applied to requests for supply abolishment's; this involves the permanent removal of CitiPower's supply assets.

The information provided in the template complies with the requirements of the Category Analysis RIN Notice (CA RIN)

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷³ data green**; and **ESTIMATED⁷⁴/derived data red**

⁷³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The data for quoted services and cost allocations for the years 2011-2013 has been sourced from the SAP accounting system. SAP is the primary financial reporting system and is the source of providing the audited statutory accounts for CitiPower. The original volume related data was sourced from CISOV.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not applicable
2010	Not applicable
2011	The SAP financial system is used to extract the information required to state the DNSP Supply Abolishment information by category and regulatory segment. Using the audited statutory accounts for CitiPower, the business uses cost elements within SAP in order to allocate costs between the regulatory segments in accordance with the cost allocation methodology.
2012	Refer 2011
2013	Refer 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	Not applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable

⁷⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2012	Not applicable
2013	Not applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No information was collated for Supply Abolishment's in 2009 and 2010.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.4 Ancillary Services - Quoted Services	
Table name: 4.4.1 - COST METRICS FOR QUOTED SERVICES	
Service	Service Subcategory
Quoted Services	Audit Design & Construction Charge

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of Notice in this box:

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

- 15.1 CitiPower must ensure that the data provided for *fee-based* and *quoted services* reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 15.2 In *regulatory templates* 4.3 and 4.4, CitiPower must list all the *fee-based* and *quoted services* that were listed in the annual tariff proposal of each relevant year.
- 15.3 In the basis of preparation, CitiPower must provide a description of each *fee-based* and *quoted service* listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.
- 15.4 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* between *standard* or *alternative control services* in *regulatory templates* 4.3 and 4.4.
- 15.5 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* as either *capex* or *opex* in *regulatory templates* 4.3 and 4.4.

Please provide a Response in this box:

Complied with Quoted services requirements as per the Notice Appendix E section 15. Audit Design & Construction is a quoted service that may be applied where CitiPower's review, approval or acceptance of works undertaken by third parties is requested by the third party or is deemed necessary by CitiPower.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁵ data green**; and **ESTIMATED⁷⁶/derived data red**

2009	2010	2011	2012	2013
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⁷⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Expenditure – customer orders booked to SAP expenditure function code 478 as per the RIN submission
Volumes – based on the number of orders in expenditure

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not applicable
2010	Not applicable
2011	SAP function code 478 is used for both Audit Design and Specification & Design. Costs have been assigned based on the customer request type category being either Audit or Specification. The remaining unallocated costs have been pro-rated based on the Audit percentage of the total function code. Volumes have been defined as the number of customer orders received in SAP expenditure function code 478 with an Audit Design customer request type.
2012	As per 2011
2013	As per 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Since data for volumes has not been captured it is assumed that the best estimate of volumes is by using the number of customer orders per SAP expenditure function code 478.
2012	As per 2011
2013	As per 2011

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Expenditure in function code 478 are either assigned to Audit Design or Specification and Design, with some additional costs unallocated to either service, therefore a pro rata approach is used on the remaining expenditure to ensure all expenditure is fully allocated. The assumption that the number of customer orders received in expenditure best represents the expenditure and volumes of Audit Design & Construction
2012	As per 2011
2013	As per 2011

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Majority of expenditure has been assigned to customer request type Audit Design with the remaining expenditure pro-rated across Audit Design and Specification and Design. The assumption that the number of customer orders received in expenditure best represents the volumes of Audit Design & Construction
2012	As per 2011

2013	As per 2011
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F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

In 2009-2010 Audit Design & Construction data was captured under Batons/Shutdown/Electrical Inspect/Meter Test & Recovery in line with previous reporting requirements to the AER under p 15.1 and 15.2 of the RIN. These years have been reported separately in the RIN templates under Batons/Shutdowns.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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***orange - Complex**

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.4 Ancillary Services - Quoted Services	
Table name: 4.4.1 - COST METRICS FOR QUOTED SERVICES	
Service	Service Subcategory
Quoted Services	Specification & Design Enquiry Charge

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of Notice in this box:

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

- 15.1 CitiPower must ensure that the data provided for *fee-based* and *quoted services* reconciles to internal planning models used in generating CitiPower 's proposed revenue requirements.
- 15.2 In *regulatory templates* 4.3 and 4.4, CitiPower must list all the *fee-based* and *quoted services* that were listed in the annual tariff proposal of each relevant year.
- 15.3 In the basis of preparation, CitiPower must provide a description of each *fee-based* and *quoted service* listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.
- 15.4 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* between *standard* or *alternative control services* in *regulatory templates* 4.3 and 4.4.
- 15.5 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* as either *capex* or *opex* in *regulatory templates* 4.3 and 4.4.

Please provide a Response in this box:

Complied with Quoted services requirements as per the Notice Appendix E section 15. Specification & Design is a quoted service that may be applied where CitiPower determines an element of detailed design is required to fairly assess the costs so that an Offer for Connection Services can be issued to a customer as required under the Electricity Distribution Licence.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁷ data green**; and **ESTIMATED⁷⁸/derived data red**

2009	2010	2011	2012	2013
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⁷⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Expenditure – customer orders booked to SAP expenditure function code 478 as per the RIN submission
Volumes – based on the number of orders in expenditure

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not applicable
2010	Not applicable
2011	SAP function code 478 is used for both Audit Design and Specification & Design. Costs have been assigned based on the customer request type category being either Audit or Specification. The remaining unallocated costs have been pro-rated based on the Specification Design percentage of the total function code. Volumes have been defined as the number of customer orders received in SAP expenditure function code 478 with an Specification Design customer request type.
2012	As per 2011
2013	As per 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Since data for volumes has not been captured it is assumed that the best estimate of volumes is by using the number of customer orders per SAP expenditure function code 478.
2012	As per 2011
2013	As per 2011

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Expenditure in function code 478 are either assigned to Audit Design or Specification and Design, with some additional costs unallocated to either service, therefore a pro rata approach is used on the remaining expenditure to ensure all expenditure is fully allocated. The assumption that the number of customer orders received in expenditure best represents the expenditure and volumes of Specification and Design
2012	As per 2011
2013	As per 2011

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Majority of expenditure has been assigned to customer request type Specification and Design with the remaining expenditure pro-rated across Audit Design and Specification and Design. The assumption that the number of customer orders received in expenditure best represents the volumes of Specification and

	Design.
2012	As per 2011
2013	As per 2011

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: In 2009-2010 Specification & Design data was captured under Batons/Shutdown/Electrical Inspect/Meter Test & Recovery in line with previous reporting requirements to the AER under p 15.1 and 15.2 of the RIN. These years have been reported separately in the RIN templates under Batons/Shutdowns.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

*orange - Complex

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.4 Ancillary Services - Quoted Services	
Table name: 4.4.1 - COST METRICS FOR QUOTED SERVICES	
Service	Service Subcategory
Quoted Services	High Load Escorts

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of Notice in this box:

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

- 15.1 CitiPower must ensure that the data provided for *fee-based* and *quoted services* reconciles to internal planning models used in generating CitiPower 's proposed revenue requirements.
- 15.2 In *regulatory templates* 4.3 and 4.4, CitiPower must list all the *fee-based* and *quoted services* that were listed in the annual tariff proposal of each relevant year.
- 15.3 In the basis of preparation, CitiPower must provide a description of each *fee-based* and *quoted service* listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.
- 15.4 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* between *standard* or *alternative control services* in *regulatory templates* 4.3 and 4.4.
- 15.5 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* as either *capex* or *opex* in *regulatory templates* 4.3 and 4.4.

Please provide a Response in this box:

Complied with Quoted services requirements as per the Notice Appendix E section 15. High Load Escort is a quoted service charge as reported in regulatory reporting which applies when a 3rd party requires ensuring safe clearance of overhead lines to allow high load vehicles to pass along roads.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁹ data green**; and **ESTIMATED⁸⁰/derived data red**

Expenditure

2009	2010	2011	2012	2013
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⁷⁹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Volume

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Revenue – from SAP general ledger 367390 as per the RIN submission
 Expenditure – the associated expenditure in the orders booked to revenue SAP as per the RIN submission
 Volumes – based on the number of orders in revenue SAP

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	Expenditure is based on actual data sourced from SAP. Volumes have been defined as the number of customer orders received in SAP revenue account 367390.
2012	As per 2011
2013	As per 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Since data for volumes has not been captured it is assumed that the best estimate of volumes is by using the number of customer orders per SAP revenue account 367390.
2012	As per 2011
2013	As per 2011

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	The assumption that the number of customer orders received in revenue best represents the volumes of High Load Escorts because the revenue account is used solely for High Load Escorts. The number of customer orders in expenditure was considered however the expenditure account is also used for low voltage so an order could be split over the two services.
2012	As per 2011
2013	As per 2011

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	The assumption that the number of customer orders received in revenue best represents the volumes of

	High Load Escorts because the revenue account is used solely for High Load Escorts.
2012	As per 2011
2013	As per 2011

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: In 2009-2010 High Load Escort data was captured under Batons/Shutdown/Electrical Inspect/Meter Test & Recovery in line with previous reporting requirements to the AER under p 15.1 and 15.2 of the RIN. These years have been reported separately in the RIN templates under Batons/Shutdowns.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

*orange - Complex

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.4 Ancillary Services - Quoted Services	
Table name: 4.4.1 - COST METRICS FOR QUOTED SERVICES	
Service	Service Subcategory
Quoted Services	Low Voltage Mains

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of Notice in this box:

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

- 15.1 CitiPower must ensure that the data provided for *fee-based* and *quoted services* reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 15.2 In *regulatory templates* 4.3 and 4.4, CitiPower must list all the *fee-based* and *quoted services* that were listed in the annual tariff proposal of each relevant year.
- 15.3 In the basis of preparation, CitiPower must provide a description of each *fee-based* and *quoted service* listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.
- 15.4 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* between *standard* or *alternative control services* in *regulatory templates* 4.3 and 4.4.
- 15.5 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* as either *capex* or *opex* in *regulatory templates* 4.3 and 4.4.

Please provide a Response in this box:

Complied with Quoted services requirements as per the Notice Appendix E section 15. Low Voltage is a quoted service charge as reported in regulatory reporting which applies when a customer requests coverage of powerlines for safety reasons.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁸¹ data green**; and **ESTIMATED⁸²/derived data red**

Expenditure

2009	2010	2011	2012	2013
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⁸¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Volume

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Revenue – from SAP general ledger 367105 as per the RIN submission
 Expenditure – the associated expenditure in the orders booked to revenue SAP as per the RIN submission
 Volumes – based on the number of orders in revenue SAP

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	Expenditure is based on actual data sourced from SAP. Volumes have been defined as the number of customer orders received in SAP revenue account 367105.
2012	As per 2011
2013	As per 2011

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Since data for volumes has not been captured it is assumed that the best estimate of volumes is by using the number of customer orders per SAP revenue account 367105.
2012	As per 2011
2013	As per 2011

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	The assumption that the number of customer orders received in revenue best represents the volumes of Low Voltage because the revenue account is used solely for Low Voltage. The number of customer orders in expenditure was considered however the expenditure account is also used for High Load Escorts so an order could be split over the two services.
2012	As per 2011
2013	As per 2011

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	The assumption that the number of customer orders received in revenue best represents the volumes of Low Voltage because the revenue account is used solely for Low Voltage.

2012	As per 2011
2013	As per 2011

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

In 2009-2010 Low Voltage data was captured under Batons/Shutdown/Electrical Inspect/Meter Test & Recovery in line with previous reporting requirements to the AER under p 15.1 and 15.2 of the RIN. These years have been reported separately in the RIN templates under Batons/Shutdowns.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

***orange - Complex**

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 4.4 Ancillary Services - Quoted Services	
Table name: 4.4.1 - COST METRICS FOR QUOTED SERVICES	
Service	Service Subcategory
Quoted Services	Batons, Shutdowns, Electrical Inspect & Meter Test & Recovery

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of Notice in this box:

15. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES

- 15.1 CitiPower must ensure that the data provided for *fee-based* and *quoted services* reconciles to internal planning models used in generating CitiPower's proposed revenue requirements.
- 15.2 In *regulatory templates* 4.3 and 4.4, CitiPower must list all the *fee-based* and *quoted services* that were listed in the annual tariff proposal of each relevant year.
- 15.3 In the basis of preparation, CitiPower must provide a description of each *fee-based* and *quoted service* listed in regulatory templates 4.3 and 4.4. In each services' description, CitiPower must explain the purpose of each service and detail the activities which comprise each service.
- 15.4 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* between *standard* or *alternative control services* in *regulatory templates* 4.3 and 4.4.
- 15.5 CitiPower is not required to distinguish expenditure for *fee-based* and *quoted services* as either *capex* or *opex* in *regulatory templates* 4.3 and 4.4.

Please provide a Response in this box:

Complied with Quoted services requirements as per the Notice Appendix E section 15. Batons, Shutdowns, Electrical Inspect & Meter Test & Recovery consists of customer requests for the coverage of powerlines close to a construction site to allow work to be safely performed in the area, isolation or shutdown of supply to their premises or meter tests carried out at the request of the customer.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁸³ data green**; and **ESTIMATED⁸⁴/derived data red**

⁸³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Expenditure

2009	2010	2011	2012	2013
------	------	------	------	------

Volumes

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Expenditure – customer orders booked to SAP expenditure function code 440 as per the RIN submission
 Volumes – based on the number of orders raised in expenditure

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Expenditure is based on actual data sourced from SAP. Volumes have been defined as the number of customer orders received in SAP expenditure function code 440.
2010	As per 2009
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Since data for volumes has not been captured it is assumed that the best estimate of volumes is by using the number of customer orders per SAP expenditure function code 440.
2010	As per 2009
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The assumption that the number of customer orders received in expenditure best represents the volumes of Batons, Shutdowns, Electrical Inspect & Meter Test & Recovery because the expenditure account is used solely for this service and expenditure is recorded against individual order numbers for each customer.
2010	As per 2009
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The assumption that the number of customer orders received in expenditure best represents the volumes of Batons, Shutdowns, Electrical Inspect & Meter Test & Recovery because the expenditure account is used solely for this service.
2010	As per 2009

2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

From 2011 this account was separated into individual accounts for each service in line with reporting requirements to the AER under p 15.1 and 15.2 of the RIN. These years have been reported separately in the RIN templates.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

***orange - Complex**

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a



AER Category Analysis RIN

CitiPower Pty

Basis of Preparation documents

Part D

2 June 2014

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5.2 Asset Age Profile

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile
Table name: 5.2.1 Asset age profile - Poles
POLES BY: HIGHEST OPERATING VOLTAGE ; MATERIAL TYPE; STAKING (IF WOOD)
STAKING OF A WOODEN POLE
<= 1 KV; WOOD
> 1 KV & <= 11 KV; WOOD
> 11 KV & <= 22 KV; WOOD
> 22 KV & <= 66 KV; WOOD
<= 1 KV; CONCRETE
> 1 KV & <= 11 KV; CONCRETE
> 11 KV & <= 22 KV; CONCRETE
> 22 KV & <= 66 KV; CONCRETE
<= 1 KV; STEEL
> 1 KV & <= 11 KV; STEEL
> 11 KV & <= 22 KV; STEEL
> 22 KV & <= 66 KV; STEEL
STAY POLES
PUBLIC LIGHTING BY: ASSET TYPE ; LIGHTING OBLIGATION
POLES / COLUMNS ; MAJOR ROAD ; STANDARD CONTROL
POLES / COLUMNS ; MINOR ROAD ; STANDARD CONTROL

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

6. ASSET AGE PROFILE

6.1 Table 5.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

For the year 2013 the data was obtained utilising a GIS (Geographical Information System) query that traces the in-service network connectivity model in GIS, to determine the poles located within the CitiPower service territory.

The information obtained from GIS enables categorisation of poles by Owner, Voltage, Material, Staking status and Age.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹ data green**; and **ESTIMATED²/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

For CitiPower (CP), the Geographical Information System (GIS) is the originating data source (i.e. from where the data is obtained).

For 2013, the source data is the same data that was used to complete the AER Annual RIN Reports (non-Financial), tab "5. General Information".

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013

¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2013	<p>The total quantity of in-commission poles was obtained from CitiPower's GIS on the 2/12/2013. It was necessary to obtain this asset data, 29 calendar days prior to the end of the year, in order to allow sufficient time to collate and prepare the end of year reports to meet all 2013 reporting deadlines. This is CitiPower's standard practice.</p> <p>CitiPower's GIS records all poles within the same data set.</p> <p>Non CitiPower owned poles and out of service poles were excluded from the reported quantities.</p> <p>The age profile of poles contains a number of records where the installation date of the asset is unknown or incorrect. Reference should be made to the document below for the methodology of distributing these across the known age profile.</p> <ul style="list-style-type: none"> • CitiPower and Powercor RIN Asset Age Profiling Assumptions Document (10 Age Profiling 2012 Description.doc) <p>In summary for the 2013 pole age profile, a base age profile was established for each class of pole using the known installation or staking date of that asset.</p> <p>For each of these classes of poles a number of records existed where the installation date was Unknown or incorrect.</p> <p>These Unknown assets were allocated across the base age profile on a pro-rata basis for each class of pole. Due to rounding in the allocation of these Unknown assets there were a number of assets which are left over (the sum of those allocated is less than the total number of poles). This is corrected by adding the difference across those years with the greatest number of assets.</p> <p>This provides the age profile of poles.</p> <p>The allocation of Public Lighting poles between Major and Minor roads is based on the proportion of lights installed in each road classification.</p>
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E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Whilst the vast majority of pole installation dates are recorded accurately, there are a number of records where the installation date of the asset is either not recorded or recorded inaccurately against a default year. An estimate of pole ages is required for those poles without a known accurate installation date.</p> <p>The information contained within GIS about poles does not provide details relating to road classifications for Public Lighting poles, hence an estimate is required for these.</p>

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>The age profile of poles contains a number of records where the installation date of the asset is unknown or incorrect. Reference should be made to the document below for the methodology of distributing these across the known age profile.</p> <ul style="list-style-type: none"> • CitiPower and Powercor RIN Asset Age Profiling Assumptions Document (10 Age Profiling 2012 Description.doc) <p>In summary, for the 2013 pole age profile, a base age profile was established for each class of pole using the known installation or staking date of that asset.</p>

	<p>For each of these classes of poles a number of records existed where the installation date was Unknown or incorrect.</p> <ul style="list-style-type: none"> • These Unknown assets were allocated across the base age profile on a pro-rata basis for each class of pole. • Due to rounding in the allocation of these Unknown assets there were a number of assets which are left over (the sum of those allocated is less than the total number of poles). <ul style="list-style-type: none"> ○ This is corrected by adding the difference across those years with the greatest number of assets. <p>This provides the age profile of poles.</p> <p>The allocation of Public Lighting poles between Major and Minor roads is based on the proportion of public lights installed in each road classification.</p>
--	---

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	<p>The selected approach to profiling the age of assets was undertaken and documented by consultants engaged for this purpose in 2012 and is the best approach we have to apportion those records where the installation date of the asset is unknown or incorrect.</p> <p>The information contained within GIS about poles does not provide details relating to road classifications for Public Lighting poles, so the allocation of Public Lighting poles between Major and Minor roads is based on the proportion of lights installed in each road classification.</p>

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

<p>Response: Not applicable</p>
--

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile - Where No Asset Quantities are Reported	
ASSET CATEGORY	VARIABLE NAME
POLES	> 11 KV & < ≈ 22 KV; WOOD > 66 KV & < ≈ 132 KV; WOOD > 132 KV; WOOD > 11 KV & < ≈ 22 KV; CONCRETE > 66 KV & < ≈ 132 KV; CONCRETE > 132 KV; CONCRETE > 11 KV & < ≈ 22 KV; STEEL > 66 KV & < ≈ 132 KV; STEEL > 132 KV; STEEL
OVERHEAD CONDUCTORS	> 11 KV & < ≈ 22 KV ; SWER > 11 KV & < ≈ 22 KV ; SINGLE-PHASE > 66 KV & < ≈ 132 KV > 132 KV
UNDERGROUND CABLES	> 22 KV & < ≈ 33 KV > 66 KV & < ≈ 132 KV > 132 KV
SERVICE LINES	< ≈ 11 KV ; RESIDENTIAL ; SIMPLE TYPE < ≈ 11 KV ; COMMERCIAL & INDUSTRIAL ; SIMPLE TYPE < ≈ 11 KV ; RESIDENTIAL ; COMPLEX TYPE < ≈ 11 KV ; COMMERCIAL & INDUSTRIAL ; COMPLEX TYPE < ≈ 11 KV ; SUBDIVISION ; COMPLEX TYPE > 11 KV & < ≈ 22 KV ; COMMERCIAL & INDUSTRIAL > 11 KV & < ≈ 22 KV ; SUBDIVISION > 22 KV & < ≈ 33 KV ; COMMERCIAL & INDUSTRIAL > 33 KV & < ≈ 66 KV ; COMMERCIAL & INDUSTRIAL > 66 KV & < ≈ 132 KV ; COMMERCIAL & INDUSTRIAL > 132 KV ; COMMERCIAL & INDUSTRIAL > 132 KV ; SUBDIVISION
TRANSFORMERS	POLE MOUNTED ; < ≈ 22KV ; < ≈ 60 KVA ; SINGLE PHASE POLE MOUNTED ; < ≈ 22KV ; > 60 KVA AND < ≈ 600 KVA ; SINGLE PHASE POLE MOUNTED ; < ≈ 22KV ; > 600 KVA ; SINGLE PHASE POLE MOUNTED ; < ≈ 22KV ; > 600 KVA ; MULTIPLE PHASE POLE MOUNTED ; > 22 KV ; < ≈ 60 KVA POLE MOUNTED ; > 22 KV ; > 60 KVA AND < ≈ 600 KVA POLE MOUNTED ; > 22 KV ; > 600 KVA KIOSK MOUNTED ; < ≈ 22KV ; < ≈ 60 KVA ; SINGLE PHASE KIOSK MOUNTED ; < ≈ 22KV ; > 60 KVA AND < ≈ 600 KVA ; SINGLE PHASE KIOSK MOUNTED ; < ≈ 22KV ; > 600 KVA ; SINGLE PHASE KIOSK MOUNTED ; < ≈ 22KV ; < ≈ 60 KVA ; MULTIPLE PHASE KIOSK MOUNTED ; > 22 KV ; < ≈ 60 KVA KIOSK MOUNTED ; > 22 KV ; > 60 KVA AND < ≈ 600 KVA KIOSK MOUNTED ; > 22 KV ; > 600 KVA KIOSK MOUNTED ; > 22 KV ; > 60 KVA AND < ≈ 600 KVA KIOSK MOUNTED ; > 22 KV ; > 600 KVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 KV ; < ≈ 60 KVA ; SINGLE PHASE GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 KV ; > 60 KVA AND < ≈ 600 KVA ; SINGLE PHASE GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 KV ; > 600 KVA ; SINGLE PHASE GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > ≈ 22 KV & < ≈ 33 KV ; > 15 MVA AND < ≈ 40 MVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > ≈ 22 KV & < ≈ 33 KV ; > 40 MVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > 66 KV & < ≈ 132 KV ; < ≈ 100 MVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > 66 KV & < ≈ 132 KV ; > 100 MVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > 132 KV ; < ≈ 100 MVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > 132 KV ; > 100 MVA

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

6. ASSET AGE PROFILE

6.1 Table 5.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word "REFURBISHED". CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

No asset quantities are reported by CitiPower for the following categories because the CitiPower network asset information systems does not provide or has no records of assets in these categories.

The CitiPower network does not use all the standard voltages in those ranges provided and are limited to 6.6kV, 11kV, 22kV and 66kV only.

ASSET CATEGORY	VARIABLE NAME
POLES	> 11 KV & < ≈ 22 KV; WOOD > 66 KV & < ≈ 132 KV; WOOD > 132 KV; WOOD > 11 KV & < ≈ 22 KV; CONCRETE > 66 KV & < ≈ 132 KV; CONCRETE > 132 KV; CONCRETE > 11 KV & < ≈ 22 KV; STEEL

	> 66 KV & < ≈ 132 KV; STEEL > 132 KV; STEEL
OVERHEAD CONDUCTORS	> 11 KV & < ≈ 22 KV ; SWER > 11 KV & < ≈ 22 KV ; SINGLE-PHASE > 66 KV & < ≈ 132 KV > 132 KV
UNDERGROUND CABLES	> 22 KV & < ≈ 33 KV > 66 KV & < ≈ 132 KV > 132 KV
SERVICE LINES	< ≈ 11 KV ; RESIDENTIAL ; SIMPLE TYPE < ≈ 11 KV ; COMMERCIAL & INDUSTRIAL ; SIMPLE TYPE < ≈ 11 KV ; RESIDENTIAL ; COMPLEX TYPE < ≈ 11 KV ; COMMERCIAL & INDUSTRIAL ; COMPLEX TYPE < ≈ 11 KV ; SUBDIVISION ; COMPLEX TYPE > 11 KV & < ≈ 22 KV ; COMMERCIAL & INDUSTRIAL > 11 KV & < ≈ 22 KV ; SUBDIVISION > 22 KV & < ≈ 33 KV ; COMMERCIAL & INDUSTRIAL > 33 KV & < ≈ 66 KV ; COMMERCIAL & INDUSTRIAL > 66 KV & < ≈ 132 KV ; COMMERCIAL & INDUSTRIAL > 132 KV ; COMMERCIAL & INDUSTRIAL > 132 KV ; SUBDIVISION
TRANSFORMERS	POLE MOUNTED ; < ≈ 22KV ; < ≈ 60 KVA ; SINGLE PHASE POLE MOUNTED ; < ≈ 22KV ; > 60 KVA AND < ≈ 600 KVA ; SINGLE PHASE POLE MOUNTED ; < ≈ 22KV ; > 600 KVA ; SINGLE PHASE POLE MOUNTED ; < ≈ 22KV ; > 600 KVA ; MULTIPLE PHASE POLE MOUNTED ; > 22 KV ; < ≈ 60 KVA POLE MOUNTED ; > 22 KV ; > 60 KVA AND < ≈ 600 KVA POLE MOUNTED ; > 22 KV ; > 600 KVA KIOSK MOUNTED ; < ≈ 22KV ; < ≈ 60 KVA ; SINGLE PHASE KIOSK MOUNTED ; < ≈ 22KV ; > 60 KVA AND < ≈ 600 KVA ; SINGLE PHASE KIOSK MOUNTED ; < ≈ 22KV ; > 600 KVA ; SINGLE PHASE KIOSK MOUNTED ; < ≈ 22KV ; < ≈ 60 KVA ; MULTIPLE PHASE KIOSK MOUNTED ; > 22 KV ; < ≈ 60 KVA KIOSK MOUNTED ; > 22 KV ; > 60 KVA AND < ≈ 600 KVA KIOSK MOUNTED ; > 22 KV ; > 600 KVA KIOSK MOUNTED ; > 22 KV ; > 60 KVA AND < ≈ 600 KVA KIOSK MOUNTED ; > 22 KV ; > 600 KVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 KV ; < ≈ 60 KVA ; SINGLE PHASE GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 KV ; > 60 KVA AND < ≈ 600 KVA ; SINGLE PHASE GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 KV ; > 600 KVA ; SINGLE PHASE GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > ≈ 22 KV & < ≈ 33 KV ; > 15 MVA AND < ≈ 40 MVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > ≈ 22 KV & < ≈ 33 KV ; > 40 MVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > 66 KV & < ≈ 132 KV ; < ≈ 100 MVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > 66 KV & < ≈ 132 KV ; > 100 MVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > 132 KV ; < ≈ 100 MVA GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; > 132 KV ; > 100 MVA

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³ data green**; and **ESTIMATED⁴/derived data red**

³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:
Not applicable

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	No asset quantities are reported by CitiPower for the previously listed categories (in section A.) because the CitiPower network asset information systems does not provide or has no records of assets in these categories. The CitiPower network does not use all of the standard voltages in those ranges provided and are limited to 6.6kV, 11kV, 22kV and 66kV only.
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	No asset quantities are reported by CitiPower for the previously listed categories (in section A.) because the CitiPower network asset information systems does not provide or has no records of assets in these categories. The CitiPower network does not use all of the standard voltages in those ranges provided and are limited to 6.6kV, 11kV, 22kV and 66kV only.
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	No asset quantities are reported by CitiPower for the previously listed categories (in section A.) because the CitiPower network asset information systems does not provide or has no records of assets in these categories. The CitiPower network does not use all of the standard voltages in those ranges provided and are limited to 6.6kV, 11kV, 22kV and 66kV only.
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	No asset quantities are reported by CitiPower for the previously listed categories (in section A.) because the CitiPower network asset information systems does not provide or has no records of assets in these categories. The CitiPower network does not use all of the standard voltages in those ranges provided and are limited to 6.6kV, 11kV, 22kV and 66kV only.

for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No asset quantities are reported by CitiPower for the previously listed categories (in section A.) because the CitiPower network asset information systems does not provide or has no records of assets in these categories. The CitiPower network does not use all of the standard voltages in those ranges provided and are limited to 6.6kV, 11kV, 22kV and 66kV only.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile
Table name: 5.2.1 Asset age profile – Overhead Conductors, LV Overhead Service Cable
OVERHEAD CONDUCTORS BY: HIGHEST OPERATING VOLTAGE; NUMBER OF PHASES (AT HV)
<= 1 kV
> 1 kV & <= 11 kV
> 11 kV & <= 22 kV; MULTIPLE-PHASE
> 22 kV & <= 66 kV SUB TRANS 22kV
> 22 kV & <= 66 kV SUB TRANS 66kV
> 66 kV & <= 132 kV
> 132 kV
PUBLIC LIGHTING CONDUCTOR
SERVICE LINES BY: CONNECTION VOLTAGE; CUSTOMER TYPE; CONNECTION COMPLEXITY
LV OVERHEAD SERVICE CABLE

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

6. ASSET AGE PROFILE

6.1 Table 5.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of

those assets in service and reported in the asset age profile.

Please provide a Response in this box:

For the year 2013 the data was obtained utilising a GIS (Geographical Information System) query that traces the in-service network connectivity model in GIS, to determine the circuit line length, which includes all spurs. Each circuit element was evaluated in its own right, for example:

- SWER lines, single-phase lines, and three-phase lines counted as one line; (Noting CitiPower only has three-phase lines)
- Double circuit lines counted as two lines

Note:-

- Although this methodology does not use the suggested Route Length methodology it does deliver the network circuit length using the criteria specified in this Information Notice.
- Overhead elements associated with communication, protection & control and unmetered loads were excluded
- Overhead elements in the DNSP's area that are owned by another DNSP were excluded

This methodology meets the requirements of this Information Notice to the best of our abilities.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵ data green**; and **ESTIMATED⁶/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

For CitiPower, the Geographical Information System (GIS) is the originating data source (i.e. from where the data is obtained).

For 2013, the source data is the same data that was used to complete the AER Annual RIN Reports (non-Financial), tab "5. General Information".

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	The total quantity of in-commission overhead conductors was obtained from CitiPower's GIS on the 2/12/2013. It was necessary to obtain this asset data, 29 calendar days prior to the end of the year, in order to allow sufficient time to collate and prepare the end of year reports to meet all 2013 reporting deadlines. This is CitiPower's standard practice.

⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>CitiPower's GIS records HV, LV and Service conductors separately.</p> <p>Non CitiPower owned conductors and out of service cables were excluded from the reported quantities.</p> <p>The overhead conductor lengths reported are those recorded as computed lengths in GIS.</p> <p>The age profile of overhead conductors contains a number of records where the installation date of the asset is unknown or incorrect.</p> <p>Reference should be made to the document below for the methodology of distributing these across the known age profile.</p> <ul style="list-style-type: none"> • CitiPower and Powercor AER RIN Asset Installation Asset Age Profiling Document (10 Age Profiling 2012 Description.doc) <p>The age profile for the 2013 data is based on the profile provided in the 2012 AER Annual RIN Reports (non-Financial) tab 3. Asset Installations. Data for 2013 has been added and minor reductions have occurred in earlier years where conductor has been replaced or retired.</p> <p>It is understood that the 2012 Conductor Age profile is based on historical work done for previous EDPR submissions.</p> <ol style="list-style-type: none"> a. Service lines with voltage levels above Low Voltage (LV) cannot be reported, as CitiPower does not record the required detail in GIS b. Customer Type and Connection Complexity are not recorded for any class of Service Lines c. Any "Conductor" assets connecting customers to the DNSP Network at voltages above LV are recorded within the data for <i>Overhead Conductors By: Highest Operating Voltage; Number of Phases (At High Voltage)</i>.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Whilst the vast majority of conductor installation dates are recorded accurately, there are a number of records where the installation date of the asset is either not recorded or recorded inaccurately against a default year. An estimate of conductor age is required for those conductor segments without a known accurate installation date.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Reference should be made to the documents listed in section D as to the methodology of distributing these overhead conductors without a known accurate installation date across the known age profile.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The selected approach to profiling the age of assets was undertaken and documented by consultants engaged for this purpose in 2012 and is the best approach we have to apportion those records where the installation date of the asset is unknown or incorrect.

2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Data has not been provided for Service Lines by *Connection Voltage (above Low Voltage (LV), Customer Type and Connection Complexity*, as these attributes are not recorded in GIS.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile – Underground cables, LV UG service cables	
Asset Group	Asset Category
UNDERGROUND CABLES BY: HIGHEST OPERATING VOLTAGE	[ALL]
Service lines	LV UG service cable

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

6. ASSET AGE PROFILE

6.1 Table 5.2.1 instructions:

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

APPENDIX F: DEFINITIONS

Simple residential connection low voltage

Single/multi-phase customer connection service; and /or:

- one span of overhead service wire or standard underground service; and/or
- an overhead road crossing.

Simple commercial/industrial connection low voltage

Single/multi-phase customer service connection and, as an example, may involve the following:

- one or more spans of overhead service wire;
- road crossing (overhead or underground).
- small LV extension or augmentation of overhead and/or underground mains.

Complex residential connection low voltage

Single/multi-phase customer connection services which are not simple customer connections and, as an example, may involve the following:

- greater than one span of overhead service wire
- extension or augmentation of the LV feeder, overhead and/or underground;
- road crossing (overhead or underground).
- Notes: This also includes the reconfiguration of LV network assets (not including any HV asset works) as a result of specific requests for connection specifications.

Complex residential connection high voltage

Single/multi-phase customer connection services which are not simple customer connections or complex type low voltage connections and, as an example, may involve the following:

- extension or augmentation of the HV feeder, overhead and/or underground;
- installation of a distribution substation (pole mounted, ground types);
- extension or augmentation of the LV feeder, overhead and/or underground;
- greater than one span of overhead service wire;
- road crossing (overhead or underground).

Notes: This also includes the reconfiguration of HV network assets (not including any LV asset works) as a result of specific requests for connection.

Complex commercial/industrial connection high voltage (customer connected at LV, minor HV works)

Multi-phase customer connection service at LV which are not simple connections and, as an example, may involve the following:

- the installation of a distribution substation (pole mounted, ground types, or indoor types);
- overhead and/or underground HV feeder extension or augmentation associated with the connection of the substation but excluding major feeder extensions or augmentation;
- installation of LV mains associated with the new substation.

Complex commercial/industrial connection high voltage – connecting HV customers

Multi-phase customer connections where the customer is supplied at HV and, as an example, may include the following:

- large extension or augmentations of the HV feeders;
- installation of a high voltage switching station or switch room.

Complex commercial/industrial connection sub-transmission

Multi-phase customer connections where the customer is connected via feeders operating between 33kV and 132kV inclusive and, as an example, may include any of the following:

- extension or augmentation of the Sub-transmission network;
- installation of switching stations, switch rooms or similar facilities.

Complex subdivision connection low voltage

Single/multi-phase customer connection and, as an example, may include the following:

- extension or augmentation of overhead or underground LV feeders including road crossings.

Complex subdivision connection high voltage (no upstream asset works)

Multi-phase customer connection which are not simple connections and, as an example, may include the following:

- extension or augmentation of HV feeders;
- installation of one or more distribution substations;
- installation of LV mains.

Notes: Each subsequent connection of a residential premises within a new estate will be treated as a connection.

The subdivision category excludes civil works (that is, the cost of trenching, excavation, backfilling or re-instatement within the subdivision development).

Installed assets – quantity currently in commission by year

The number of assets currently in commission and the year they were installed.

Underground cables

These assets have the primary function of distributing power, below ground, within the distribution network. This includes cable ends, joints, terminations and associated hardware and equipment (e.g. surge diverters, etc.), cable tunnels, ducts, pipes, pits.

Please provide a Response in this box:

The actual installed quantities of underground cables, currently in commission, have been provided by operating voltage, in accordance with the requested asset sub-categorisation to the extent possible.

One additional sub-category has been added for Public Lighting underground (supply) cables.

- a. These cables operate at low voltage, but are considerably smaller in size than typical LV distribution cable.

LV underground service cables are identified in CitiPower's Geographical Information System (GIS).

- b. The installed quantities of LV underground services, currently in commission, are provided with no further breakdown of the type or nature of the service.

- Service lines with voltage levels above Low Voltage (LV) cannot be reported, as CitiPower does not record the required detail in GIS
- Customer Type and Connection Complexity are not recorded for any class of Service Lines
- Any "Conductor" assets connecting customers to the DNSP Network at voltages above LV are recorded within the data for *Underground Cables By: Highest Operating Voltage*

This methodology meets the requirements of this Information Notice to the best of our abilities.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷ data green**; and **ESTIMATED⁸/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The details of underground cables and services, currently in commission, were obtained from CitiPower's Geographical Information System (GIS).

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>The total quantity of in-commission underground cables was obtained from CitiPower's GIS on the 2/12/2013. It was necessary to obtain this asset data, 29 calendar days prior to the end of the year, in order to allow sufficient time to collate and prepare the end of year reports to meet all 2013 reporting deadlines. This is CitiPower's standard practice.</p> <p>CitiPower's GIS records HV and LV cables separately.</p> <p>Non CitiPower owned cables and out of service cables were excluded from the reported quantities.</p> <p>The underground cable lengths reported are those recorded as computed lengths in GIS.</p> <p>a. The length reported is the sum of the computed length in each sub-category except for three phase cable runs that utilise a separate single core cable for each phase.</p> <ul style="list-style-type: none">o In the latter case the total computed cable length was divided by three, enabling consistent cable length reporting regardless of the actual cable configuration installed. <p>b. Where a cable voltage was unknown, the quantity of cable was apportioned across the other cable voltages, in direct proportion with the known sub-category quantities.</p> <p>c. Where an LV cable type was unknown, the quantity of cable was apportioned across the other LV cable types, in direct proportion with the known sub-category quantities.</p> <p>The age profile of underground cables contains a number of records where the installation date of the asset is unknown or incorrect. Reference should be made to the document below for the methodology of distributing these across the known age profile.</p> <ul style="list-style-type: none">• CitiPower and Powercor RIN Asset Age Profiling Assumptions Document

⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

(10 Age Profiling 2012 Description.doc)

A known age profile was previously established for assets installed from 1910 to 2009.

- The underground cable data, for the years 2010 to 2012, was based on the difference between the total cable length reported in 2009 and the total cable length recorded at the end of 2012.
- The cable lengths were allocated to each of the years from 2010 to 2012 in the same proportions as the pole age profile for that period.
 - If more cable was recorded in 2012 than 2009, then the additional cable length was allocated to each of the years from 2010 to 2012 in the same proportion as the poles installed during that period.
 - If less cable was recorded in 2012 than 2009, then no cable was reported as installed from 2010 to 2012.

The 2013 age profile (as at 2/12/2013) is based on an adjustment of the profile reported in the 2012 Annual RIN Report (non-financial), tab 3 Asset Installation, table 1.

The reported 2013 age profile has been based on the profile reported in the 2012 Annual RIN Report (non-financial), tab 3 Asset Installation, table 1, updated to match the total length of cable in service at 2/12/2013,

- The cable length reported to be installed during 2013 was sourced directly from GIS.
- The total cable, reported to be installed from 1911 to 2012 is based on the total length recorded in GIS, as at 2/12/2013, minus the length installed during 2013.
- The total cable length has been apportioned across 1911 to 2012, using the same proportions as the age profile reported in the 2012 Annual RIN report.

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	The underground cable installation year data, recorded in GIS and other CitiPower databases, is incomplete. Some installation years are unknown as a result of unpopulated fields and the use of default dates, the most common being 1/1/1970. This made it necessary to estimate the missing installation years.

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>The age profile of underground cables contains a number of records where the installation date of the asset is unknown or incorrect. Reference should be made to the document below for the methodology of distributing these across the known age profile.</p> <ul style="list-style-type: none"> • CitiPower and Powercor RIN Asset Age Profiling Assumptions Document (10 Age Profiling 2012 Description.doc) <p>A known age profile was previously established for assets installed from 1910 to 2009.</p> <ul style="list-style-type: none"> • The underground cable data, for the years 2010 to 2012, was based on the difference between the total cable length reported in 2009 and the total cable length recorded at the end of 2012. • The cable lengths were allocated to each of the years from 2010 to 2012 in the same proportions as the pole age profile for that period. <ul style="list-style-type: none"> ○ If more cable was recorded in 2012 than 2009, then the additional cable length was allocated to each of the years from 2010 to 2012 in the same proportion as the poles installed during that period.

	<ul style="list-style-type: none"> ○ If less cable was recorded in 2012 than 2009, then no cable was reported as installed from 2010 to 2012. <p>The 2013 age profile (as at 2/12/2013) is based on an adjustment of the profile reported in the 2012 Annual RIN Report (non-financial), tab 3 Asset Installation, table 1.</p> <p>The reported 2013 age profile has been based on the profile reported in the 2012 Annual RIN Report (non-financial), tab 3 Asset Installation, table 1, updated to match the total length of cable in service at 2/12/2013,</p> <ul style="list-style-type: none"> • The cable length reported to be installed during 2013 was sourced directly from GIS. • The total cable, reported to be installed from 1911 to 2012 is based on the total length recorded in GIS, as at 2/12/2013, minus the length installed during 2013. <p>The total cable length has been apportioned across 1911 to 2012, using the same proportions as the age profile reported in the 2012 Annual RIN report.</p>
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Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	The selected approach to profiling the age of assets was undertaken and documented by consultants engaged for this purpose in 2012 and is the best approach we have to apportion those records where the installation date of the asset is unknown or incorrect.

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:	<p>Data for the years 2009-2012 is not applicable to this Information Notice, as the request was for a single asset age profile. The age profile submitted is based on 2013 data only as described in Section D</p> <p>The installed quantities of in-commission underground <u>services</u> are unable to be provided by the sub-categories requested.</p> <p>a. CitiPower's underground service asset records are not specified by development type, e.g. residential, commercial/industrial, subdivision.</p> <ul style="list-style-type: none"> ○ Additionally, the service records are not specified by the nature of the development e.g. simple or complex. <p>b. CitiPower has reported the total LV service cable lengths, by installation year, without any further breakdown.</p> <p>c. The higher voltage underground service cables are unable to be identified separately, but are included in the underground cables section, by highest operating voltage.</p>
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G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset Age Profile	
Table name: TABLE 5.2.1 Asset Age Profile	
Asset Group	Asset Category
Transformers	[ALL]

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

6. ASSET AGE PROFILE

6.1 Table 5.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \right) \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

APPENDIX F: DEFINITIONS

Installed assets – quantity currently in commission by year

The number of assets currently in commission and the year they were installed.

Transformers

These are assets used to transform between voltage levels within the network. This includes all its components such as the cooling systems and tap changing equipment (where installed). It excludes any pole mounted assets that are included in any other asset group. For the avoidance of doubt, this does not include instrument transformers as defined in the National Electricity Rules. It also does not include auxiliary transformers.

Auxiliary transformer

A transformer installed normally within a substation to provide power supply to substation auxiliaries, such as controls, motors, and communication facilities.

Please provide a Response in this box:

The actual installed quantities of transformers, currently in commission, have been provided by highest operating voltage as well as the highest nameplate rating.

One additional sub-category has been added:

- **Auto-Transformers**
 - These did not fit into any of the standard sub-categories.

This methodology meets the requirements of this Information Notice to the best of our abilities.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁹ data green**; and **ESTIMATED¹⁰/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

The details of distribution and auto transformers were obtained from CitiPower's Geographical Information System (GIS).

The quantities and operating voltages for Zone Substation (ZSS) transformers were obtained from CitiPower's asset management system SAP R/3.

The ratings of ZSS transformers were obtained from the document entitled 'CP2012 - Zone Substation Cyclic Ratings (MVA) Table – Issue Date 28/11/2013'. This document is produced by the CitiPower Network Strategy group and is published on CitiPower's intranet.

D. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

⁹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p data-bbox="220 416 555 450">Distribution Transformers</p> <p data-bbox="220 456 1505 562">The total quantity of in-commission transformers was obtained from CitiPower's GIS on the 2/12/2013. It was necessary to obtain this asset data, 29 calendar days prior to the end of the year, in order to allow sufficient time to collate and prepare the end of year reports to meet all 2013 annual reporting deadlines. This is CitiPower's standard practice.</p> <p data-bbox="220 568 1238 602">Only in-service (in-commission) transformers were included in the reported quantities.</p> <p data-bbox="220 609 1505 741">Where transformer voltages, capacities or phase types were unknown, the quantity of transformers was apportioned across the known voltages, capacities or phase types, in direct proportion with the quantities of the known sub-categories. The resulting numbers were then subsequently rounded to provide whole numbers.</p> <p data-bbox="220 748 1505 853">The age profile of transformers contains a number of records where the installation date of the asset is unknown or incorrect. Reference should be made to the document below for the methodology of distributing these across the known age profile.</p> <ul data-bbox="268 882 1187 943" style="list-style-type: none"> <li data-bbox="268 882 1187 943">• CitiPower and Powercor RIN Asset Age Profiling Assumptions Document (10 Age Profiling 2012 Description.doc) <p data-bbox="220 972 1246 1005">A known age profile was previously established for assets installed from 1910 to 2009.</p> <ul data-bbox="268 1012 1505 1341" style="list-style-type: none"> <li data-bbox="268 1012 1505 1072">• The transformer data for the years 2010 to 2012 was based on the difference between the total population numbers reported in 2009 and those recorded at the end of 2012. <li data-bbox="268 1079 1505 1341">• The transformer numbers were allocated to each of the years from 2010 to 2012 in the same proportions as the pole age profile for that period. <ul style="list-style-type: none"> <li data-bbox="363 1169 1505 1274">○ If more transformers were recorded in 2012 than 2009, then the additional quantities were allocated to each of the years from 2010 to 2012 in the same proportion as the poles installed during that period. <li data-bbox="363 1281 1505 1341">○ If fewer transformers were recorded in 2012 than 2009, then no transformers were reported as installed from 2010 to 2012. <p data-bbox="220 1370 1505 1453">The 2013 age profile (as at 2/12/2013) is based on an adjustment of the profile reported in the 2012 Annual RIN Report (non-financial), tab 3 Asset Installation, table 1.</p> <ul data-bbox="268 1460 1505 1632" style="list-style-type: none"> <li data-bbox="268 1460 1505 1565">• The reported 2013 age profile has been based on the profile reported in the 2012 Annual RIN Report (non-financial), tab 3 Asset Installation, table 1, updated to match the total number of distribution transformers in commission at 2/12/2013 <li data-bbox="268 1572 1505 1632">• The distribution transformer quantities reported to be installed during 2013 are sourced directly from GIS. <p data-bbox="220 1662 1505 1744">The total of distribution transformers quantities reported to be installed from 1911 to 2012 is based on the total population recorded in GIS as at 2/12/2013, minus those installed during 2013.</p> <ul data-bbox="268 1751 1505 1856" style="list-style-type: none"> <li data-bbox="268 1751 1505 1812">• The total quantities have been apportioned across 1911 to 2012, using the same proportions as the age profile reported in the 2012 Annual RIN report. <li data-bbox="268 1818 1203 1856">• The quantities in each year have been rounded to provide whole numbers. <p data-bbox="220 1908 612 1942">Zone Substation Transformers</p> <p data-bbox="220 1948 1505 2054">The installed quantities of zone substation transformers have been obtained from CitiPower's asset management system SAP R/3. These transformers are identified as Object type ='STN_TRANS'. The installation year was taken from the field labelled 'ConstYr'.</p> <ul data-bbox="268 2060 1334 2098" style="list-style-type: none"> <li data-bbox="268 2060 1334 2098">• Only in-service (in-commission) transformers were included in the reported quantities.

The ratings of zone substation transformers were taken from the highest nameplate rating as contained in the document titled 'CP2012 - Zone Substation Cyclic Ratings (MVA) Table – Issue Date 28/11/2013'.

Auto Transformers

The installed quantities of auto transformers, currently in commission, were obtained from CitiPower's GIS.

- Only those auto transformers which are verified as owned by CitiPower have been reported
- Only in-service (in-commission) transformers were included in the reported quantities.
- The installation dates are the same as was reported in the 2012 Annual RIN Report (non-financial), tab 3 Asset Installation, table 1.

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	Whilst the vast majority of distribution transformer installation dates are recorded accurately, there are a number of records where the installation date of the asset is either not recorded or recorded inaccurately against a default year. An estimate of ages is required for those distribution transformers without a known accurate installation date.

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013

2013	<p>Reference should be made to the documents listed in section D as to the methodology of apportioning transformers without a known accurate installation date across the known age profile.</p> <p>The age profile of transformers contains a number of records where the installation date of the asset is unknown or incorrect. Reference should be made to the document below for the methodology of distributing these across the known age profile.</p> <ul style="list-style-type: none"> • CitiPower and Powercor RIN Asset Age Profiling Assumptions Document (10 Age Profiling 2012 Description.doc) <p>A known age profile was previously established for assets installed from 1910 to 2009.</p> <ul style="list-style-type: none"> • The transformer data for the years 2010 to 2012 was based on the difference between the total population numbers reported in 2009 and those recorded at the end of 2012. • The transformer numbers were allocated to each of the years from 2010 to 2012 in the same proportions as the pole age profile for that period. <ul style="list-style-type: none"> ○ If more transformers were recorded in 2012 than 2009, then the additional quantities were allocated to each of the years from 2010 to 2012 in the same proportion as the poles installed during that period. ○ If fewer transformers were recorded in 2012 than 2009, then no transformers were reported as installed from 2010 to 2012. <p>The 2013 age profile (as at 2/12/2013) is based on an adjustment of the profile reported in the 2012 Annual RIN Report (non-financial), tab 3 Asset Installation, table 1.</p> <ul style="list-style-type: none"> • The reported 2013 age profile has been based on the profile reported in the 2012 Annual RIN Report (non-financial), tab 3 Asset Installation, table 1, updated to match the total number of distribution transformers in commission at 2/12/2013 • The distribution transformer quantities reported to be installed during 2013 are sourced directly from GIS. <p>The total of distribution transformers quantities reported to be installed from 1911 to 2012 is based on the total population recorded in GIS as at 2/12/2013, minus those installed during 2013.</p> <ul style="list-style-type: none"> • The total quantities have been apportioned across 1911 to 2012, using the same proportions as the age profile reported in the 2012 Annual RIN report. <p>The quantities in each year have been rounded to provide whole numbers.</p>
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Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	The selected approach to profiling the age of assets was undertaken and documented by consultants engaged for this purpose in 2012, and is the best approach we have to apportion those records where the installation date of the asset is unknown or incorrect.

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset Age Profile	
Table name: TABLE 5.2.1 Asset Age Profile	
Asset Group	Asset Category
Switchgear	<=11kV FUSE

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \right) \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category’s contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

Information provided is consistent with the requirements

- a) Not applicable
- b) Not applicable
- c) Sub categorisation not applicable to this asset category
- d) Sub categorisation not applicable to this asset category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹¹ data green**; and **ESTIMATED¹²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Source data has been extracted from the GIS system for network assets.
 The method of extraction was by query using the following parameters to define the target assets
 Object Type = HV Switch
 Switch Type = Fuse
 DB Code = 24 (24 = CitiPower)
 The age profiles used as the proxy age profile for <=11kV FUSE is the summation of the following transformer age profiles as submitted
 POLE MOUNTED ; < = 22kV ; < = 60 kVA ; MULTIPLE PHASE
 POLE MOUNTED ; < = 22kV ; > 60 kVA AND < = 600 kVA ; MULTIPLE PHASE
 KIOSK MOUNTED ; < = 22kV ; > 60 kVA AND < = 600 kVA ; MULTIPLE PHASE
 KIOSK MOUNTED ; < = 22kV ; > 600 kVA ; MULTIPLE PHASE
 GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 kV ; < = 60 kVA ; MULTIPLE PHASE
 GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 kV ; > 60 kVA AND < = 600 kVA ; MULTIPLE PHASE
 GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 kV ; > 600 kVA ; MULTIPLE PHASE

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	Methodology Source data has been extracted from the GIS system for network assets. The method of extraction was by query using the following parameters to define the target assets Object Type = HV Switch Switch Type = Fuse DB Code = 24 (24 = CitiPower) The total number of fuses in the required category was apportioned across years based on the age profile for transformers as below. The age profiles used as the proxy age profile for <=11kV FUSE is the summation of the following transformer age profiles as submitted POLE MOUNTED ; < = 22kV ; < = 60 kVA ; MULTIPLE PHASE

¹¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	POLE MOUNTED ; < = 22kV ; > 60 kVA AND < = 600 kVA ; MULTIPLE PHASE KIOSK MOUNTED ; < = 22kV ; > 60 kVA AND < = 600 kVA ; MULTIPLE PHASE KIOSK MOUNTED ; < = 22kV ; > 600 kVA ; MULTIPLE PHASE GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 kV ; < = 60 kVA ; MULTIPLE PHASE GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 kV ; > 60 kVA AND < = 600 kVA ; MULTIPLE PHASE GROUND OUTDOOR / INDOOR CHAMBER MOUNTED ; < 22 kV ; > 600 kVA ; MULTIPLE PHASE Assumptions GIS system identifies all HV fuse installations and quantities. Assumption is reasonable as fuses are part of the connection model used to manage faults Age data for fuses (installation date) is not recorded or set to default dates or not able to be validated Use of the summation of the transformer age profiles as the proxy for the fuse age profile is reasonable as fuses are installed when the transformers are installed and energised. A small variance would exist due to fuses replaced after faults however this would be small especially for indoor and kiosk transformers
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E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	The actual data was used to count the total number of fuses. Age data for fuses is not recorded or set to default dates or not able to be validated. The age profile has been estimated using transformer age as a proxy

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	Age data for fuses (installation date) is not recorded or set to default dates or not able to be validated Use of the summation of the transformer age profiles as the proxy for the fuse age profile is reasonable as fuses are installed when the transformers are installed and energised. A small variance would exist due to fuses replaced after faults however this would be small especially for indoor and kiosk transformers

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	The approach ensures the actual number of assets is counted and the age profile estimated using the age profile of a related asset (transformers) Age data for fuses (installation date) is not recorded or set to default dates or not able to be validated Use of the summation of the transformer age profiles as the proxy for the fuse age profile is reasonable as fuses are installed when the transformers are installed and energised. A small variance would exist due to fuses replaced after faults however this would be small especially for indoor and kiosk transformers

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	< ≈ 11 KV ; OPERATIONAL SWITCH

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \right) \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category’s contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

- a) Not applicable
- b) Not applicable
- c) Sub categorisation not applicable to this asset category
- d) Sub categorisation not applicable to this asset category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹³ data green**; and **ESTIMATED¹⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

<p>Response:</p> <ul style="list-style-type: none"> • < ≈ 11 KV ; OPERATIONAL SWITCH • Raw equipment data extracted from SAP by Query including Object Type

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	as per 2013
2010	as per 2013
2011	as per 2013
2012	as per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>< ≈ 11 KV ; OPERATIONAL SWITCH</p> <ul style="list-style-type: none"> • Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant • A pivot table was created from this raw data • Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP • Data further summarised in the pivot table using operating voltage 11KV, 22KV or 66KV • Data further summarised in the pivot table using Object type = D_SWITCH, STN_SWITCH • Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP") • Resultant data reviewed to ensure that Construct Year is valid or blank • Assets totalled by Construct year for those with non blank data summing the results for Object Type = D_SWITCH and STN_SWITCH and Operating Voltage = 11KV • The age profile for the total number of assets in the required asset category was constructed using the age profile of 11kV circuit breakers as a proxy. To achieve this the total number of assets was apportioned across the years according to the proxy profile. • The resultant age profile was used to populate the table

¹³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

¹⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	as per 2013
2010	as per 2013
2011	as per 2013
2012	as per 2013
2013	<p>For those assets with blank Construct year</p> <ul style="list-style-type: none"> Blank Construct year data indicates that the data was not available in the SAP asset management system. This could be a result of the data not being entered or inadvertently overwritten with blanks during previous database system migrations or upgrades. For blanks, data was unable to be verified to confirm actual year of construction No other consistent basis was available to estimate individual construct year data Actual know recorded data has been used wherever possible

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	as per 2013
2010	as per 2013
2011	as per 2013
2012	as per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As most of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the total number of assets across the proxy age profile established for 11kV and 22kV circuit breakers.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>< ≈ 11 KV ; OPERATIONAL SWITCH</p> <ul style="list-style-type: none"> Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant A pivot table was created from this raw data Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP Data further summarised in the pivot table using operating voltage 11KV, 22KV or 66KV Data further summarised in the pivot table using Object type = D_SWITCH, STN_SWITCH Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP") Resultant data reviewed to ensure that Construct Year is valid or blank Assets totalled by Construct year for those with non blank data summing the results for Object Type = D_SWITCH and STN_SWITCH and Operating Voltage = 11KV The age profile for the total number of assets in the required asset category was constructed using the age profile of 11kV circuit breakers as a proxy. To achieve this the total number of assets was apportioned across the years according to the proxy profile. The resultant age profile was used to populate the table

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	as per 2013
2010	as per 2013
2011	as per 2013
2012	as per 2013
2013	<p>No other reliable data is readily available for the substitution of blanks in the construct year data</p> <p>The equipment data in SAP is updated from time to time when new data becomes available from any source. That new data is verified and if appropriate written into SAP. The queries undertaken to provide the raw data for this asset age profile use the current available data from the SAP asset management database</p>

The reason for selecting and using the proxy age profile is that the age profile for 11kV circuit breakers is relatively complete with known data and would most effectively represent the expected age profile of the required assets

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	<=11kV ; Circuit Breaker

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \right) \times \text{economic life of asset sub-category}_i$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

- a) Not applicable
- b) Not applicable
- c) Sub categorisation not applicable to this asset category
- d) Sub categorisation not applicable to this asset category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹⁵ data green**; and **ESTIMATED¹⁶/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

- <=11kV Circuit Breaker
- Raw equipment data extracted from SAP by Query including Object Type

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p><=11kV Circuit Breaker</p> <ul style="list-style-type: none"> • Raw equipment data extracted from SAP by Query including Object Type and Construct Year • A pivot table was created from this raw data • Data summarised by Object Type = CB_11kV • Data filtered to exclude circuit breakers not connected to the network (GIS STATUS does not equal "not connected") • Data filtered to ensure only CitiPower assets identified and counted (Company Code equals "4650") • Resultant data reviewed to ensure that Construct Year is valid or blank • Assets totalled by Construct year for those with non blank data • The total number of Assets with blank Construct Year data was apportioned across the age profile derived from those assets with non blank Construct year • The resultant age profile was used to populate the table

¹⁵ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

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E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>For those assets with blank Construct year</p> <ul style="list-style-type: none"> Blank Construct year data indicates that the data was not available in the SAP asset management system. This could be a result of the data not being entered or inadvertently overwritten with blanks during previous database system migrations or upgrades. For blanks, data was unable to be verified to confirm actual year of construction No other consistent basis was available to estimate individual construct year data Actual know recorded data has been used wherever possible

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p><=11kV Circuit Breaker</p> <ul style="list-style-type: none"> Raw equipment data extracted from SAP by Query including Object Type and Construct Year A pivot table was created from this raw data Data summarised by Object Type = CB_11kV Data filtered to exclude circuit breakers not connected to the network (GIS STATUS does not equal "not connected") Data filtered to ensure only CitiPower assets identified and counted (Company Code equals "4650") Resultant data reviewed to ensure that Construct Year is valid or blank Assets totalled by Construct year for those with non blank data The total number of Assets with blank Construct Year data was apportioned across the age profile derived from those assets with non blank Construct year The resultant age profile was used to populate the table

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>No other reliable data is readily available for the substitution of blanks in the construct year data</p> <p>The equipment data in SAP is updated from time to time when new data becomes available from any source. That new data is verified and if appropriate written into SAP. The queries undertaken to provide the raw data for this asset age profile use the current available data from the SAP asset management database.</p>

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	11 KV & < ≈ 22 KV ; OPERATIONAL SWITCH

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category’s contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

- a) Not applicable
- b) Not applicable
- c) Sub categorisation not applicable to this asset category
- d) Sub categorisation not applicable to this asset category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹⁷ data green**; and **ESTIMATED¹⁸/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

- > 11 KV & < ≈ 22 KV ; OPERATIONAL SWITCH
- Raw equipment data extracted from SAP by Query including Object Type

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

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2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>> 11 KV & < ≈ 22 KV ; OPERATIONAL SWITCH</p> <ul style="list-style-type: none"> • Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant • A pivot table was created from this raw data • Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP • Data further summarised in the pivot table using operating voltage 11KV, 22KV or 66KV • Data further summarised in the pivot table using Object type = D_SWITCH, STN_SWITCH • Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP") • Resultant data reviewed to ensure that Construct Year is valid or blank • Assets totalled by Construct year for those with non blank data summing the results for Object Type = D_SWITCH and STN_SWITCH and Operating Voltage = 22KV • The age profile for the total number of assets in the required asset category was constructed using the age profile of 11kV circuit breakers as a proxy. <p>To achieve this the total number of assets was apportioned across the years according to the proxy</p>

¹⁷ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

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	profile. <ul style="list-style-type: none"> The resultant age profile was used to populate the table
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E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>For those assets with blank Construct year</p> <ul style="list-style-type: none"> Blank Construct year data indicates that the data was not available in the SAP asset management system. This could be a result of the data not being entered or inadvertently overwritten with blanks during previous database system migrations or upgrades. For blanks, data was unable to be verified to confirm actual year of construction No other consistent basis was available to estimate individual construct year data Actual know recorded data has been used wherever possible

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As most of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the total number of assets across the proxy age profile established for 11kV and 22kV circuit breakers.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset > 11 KV & < ≈ 22 KV ; OPERATIONAL SWITCH</p> <ul style="list-style-type: none"> Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant A pivot table was created from this raw data Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP Data further summarised in the pivot table using operating voltage 11KV, 22KV or 66KV Data further summarised in the pivot table using Object type = D_SWITCH, STN_SWITCH Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP") Resultant data reviewed to ensure that Construct Year is valid or blank Assets totalled by Construct year for those with non blank data summing the results for Object Type = D_SWITCH and STN_SWITCH and Operating Voltage = 22KV The age profile for the total number of assets in the required asset category was constructed using the age profile of 11kV circuit breakers as a proxy. To achieve this the total number of assets was apportioned across the years according to the proxy profile. The resultant age profile was used to populate the table

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	No other reliable data is readily available for the substitution of blanks in the construct year data

The equipment data in SAP is updated from time to time when new data becomes available from any source. That new data is verified and if appropriate written into SAP. The queries undertaken to provide the raw data for this asset age profile use the current available data from the SAP asset management database

The reason for selecting and using the proxy age profile is that the age profile for 11kV circuit breakers is relatively complete with known data and would most effectively represent the expected age profile of the required assets

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	> 11 KV & < ≈ 22 KV ; CIRCUIT BREAKER

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category’s contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

- a) Not applicable
- b) Not applicable
- c) Sub categorisation not applicable to this asset category
- d) Sub categorisation not applicable to this asset category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL¹⁹ data green**; and **ESTIMATED²⁰/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

- > 11 KV & < ≈ 22 KV ; CIRCUIT BREAKER
- Raw equipment data extracted from SAP by Query including Object Type

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>> 11 KV & < ≈ 22 KV ; CIRCUIT BREAKER</p> <ul style="list-style-type: none"> • Raw equipment data extracted from SAP by Query including Object Type and Construct Year • A pivot table was created from this raw data • Data summarised by Object Type = CB_22KV • Data filtered to exclude circuit breakers not connected to the network (GIS STATUS does not equal "not connected") • Data filtered to ensure only CitiPower assets identified and counted (Company Code equals "4650") • Resultant data reviewed to ensure that Construct Year is valid or blank • Assets totalled by Construct year for those with non blank data • The total number of Assets with blank Construct Year data was apportioned across the age profile derived from those assets with non blank Construct year • The resultant age profile was used to populate the table.

¹⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>For those assets with blank Construct year</p> <ul style="list-style-type: none"> Blank Construct year data indicates that the data was not available in the SAP asset management system. This could be a result of the data not being entered or inadvertently overwritten with blanks during previous database system migrations or upgrades. For blanks, data was unable to be verified to confirm actual year of construction No other consistent basis was available to estimate individual construct year data Actual know recorded data has been used wherever possible

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>> 11 KV & < ≈ 22 KV ; CIRCUIT BREAKER</p> <ul style="list-style-type: none"> Raw equipment data extracted from SAP by Query including Object Type and Construct Year A pivot table was created from this raw data Data summarised by Object Type = CB_22KV Data filtered to exclude circuit breakers not connected to the network (GIS STATUS does not equal "not connected") Data filtered to ensure only CitiPower assets identified and counted (Company Code equals "4650") Resultant data reviewed to ensure that Construct Year is valid or blank Assets totalled by Construct year for those with non blank data The total number of Assets with blank Construct Year data was apportioned across the age profile derived from those assets with non blank Construct year The resultant age profile was used to populate the table

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>No other reliable data is readily available for the substitution of blanks in the construct year data</p> <p>The equipment data in SAP is updated from time to time when new data becomes available from any source. That new data is verified and if appropriate written into SAP. The queries undertaken to provide the raw data for this asset age profile use the current available data from the SAP asset management database</p>

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	> 22 kV & < = 33 kV ; SWITCH
Switchgear by: Highest Operating Voltage; Switch Function	> 22 kV & < = 33 kV ; CIRCUIT BREAKER
Switchgear by: Highest Operating Voltage; Switch Function	> 66 kV & < = 132 kV ; SWITCH
Switchgear by: Highest Operating Voltage; Switch Function	> 66 kV & < = 132 kV ; CIRCUIT BREAKER
Switchgear by: Highest Operating Voltage; Switch Function	> 132 kV ; SWITCH
Switchgear by: Highest Operating Voltage; Switch Function	> 132 kV ; CIRCUIT BREAKER
Switchgear by: Highest Operating Voltage; Switch Function	> 33 KV & < ≈ 66 KV ; ISOLATORS, EARTHING SWITCH
Switchgear by: Highest Operating Voltage; Switch Function	< ≈ 22 KV ; REGULATOR

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

6. ASSET AGE PROFILE

6.1 Table 5.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY

AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \right) \times \text{economic life of asset sub-category}_i$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

No asset quantities are reported by CitiPower for the following categories

- > 22 kV & <= 33 kV ; SWITCH
- > 22 kV & <= 33 kV ; CIRCUIT BREAKER
- > 66 kV & <= 132 kV ; SWITCH
- > 66 kV & <= 132 kV ; CIRCUIT BREAKER
- > 132 kV ; SWITCH
- > 132 kV ; CIRCUIT BREAKER
- > 33 kV & < ≈ 66 kV ; ISOLATORS, EARTHING SWITCH
- < ≈ 22 kV ; REGULATOR

CitiPower network does not contain assets in these categories.
The CitiPower network does not use standard voltages in those ranges.

The CitiPower Network HV network voltages are 6.6kV, 11kV, 22kV and 66kV only

B. Actual vs. Estimated Data colour coding

For each year, please shade ACTUAL²¹ data green; and ESTIMATED²²/derived data red

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:
Not applicable

²¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."
'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	CitiPower network does not contain assets in these categories. The CitiPower network does not use standard voltages in those ranges The CitiPower Network HV network voltages are 6.6kV, 11kV, 22kV and 66kV only

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	CitiPower network does not contain assets in these categories. The CitiPower network does not use standard voltages in those ranges The CitiPower Network HV network voltages are 6.6kV, 11kV, 22kV and 66kV only

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	CitiPower network does not contain assets in these categories. The CitiPower network does not use standard voltages in those ranges The CitiPower Network HV network voltages are 6.6kV, 11kV, 22kV and 66kV only

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not applicable
2010	Not applicable
2011	Not applicable
2012	Not applicable
2013	CitiPower network does not contain assets in these categories. The CitiPower network does not use standard voltages in those ranges The CitiPower Network HV network voltages are 6.6kV, 11kV, 22kV and 66kV only

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

No asset quantities are reported by CitiPower for the following categories

- > 22 kV & <= 33 kV ; SWITCH
- > 22 kV & <= 33 kV ; CIRCUIT BREAKER
- > 66 kV & <= 132 kV ; SWITCH
- > 66 kV & <= 132 kV ; CIRCUIT BREAKER
- > 132 kV ; SWITCH
- > 132 kV ; CIRCUIT BREAKER
- > 33 KV & < ≈ 66 KV ; ISOLATORS, EARTHING SWITCH
- < ≈ 22 KV ; REGULATOR

CitiPower network does not contain assets in these categories.
 The CitiPower network does not use standard voltages in those ranges.

The CitiPower Network HV network voltages are 6.6kV, 11kV, 22kV and 66kV only

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009 2010 2011 2012 2013

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	> 33 KV & < ≈ 66 KV ; OPERATIONAL SWITCH

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \right) \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

- a) Not Applicable
- b) Not Applicable
- c) Sub categorisation not applicable to this asset category
- d) Sub categorisation not applicable to this asset category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²³ data green**; and **ESTIMATED²⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

- > 33 KV & < ≈ 66 KV ; OPERATIONAL SWITCH
- Raw equipment data extracted from SAP by Query including Object Type

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>> 33 KV & < ≈ 66 KV ; OPERATIONAL SWITCH</p> <ul style="list-style-type: none"> • Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant • A pivot table was created from this raw data • Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP • Data further summarised in the pivot table using operating voltage 11KV, 22KV or 66KV • Data further summarised in the pivot table using Object type = D_SWITCH, STN_SWITCH • Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP") • Resultant data reviewed to ensure that Construct Year is valid or blank • Assets totalled by Construct year for those with non blank data summing the results for Object Type = D_SWITCH and STN_SWITCH and Operating Voltage = 66KV • The age profile for the total number of assets in the required asset category was constructed using the age profile of 11kV circuit as a proxy.

²³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>To achieve this the total number of assets was apportioned across the years according to the proxy profile.</p> <ul style="list-style-type: none"> The resultant age profile was used to populate the table
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E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>For those assets with blank Construct year</p> <ul style="list-style-type: none"> Blank Construct year data indicates that the data was not available in the SAP asset management system. This could be a result of the data not being entered or inadvertently overwritten with blanks during previous database system migrations or upgrades. For blanks, data was unable to be verified to confirm actual year of construction No other consistent basis was available to estimate individual construct year data Actual know recorded data has been used wherever possible

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As most of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the total number of assets across the proxy age profile for 11kV circuit breakers.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>> 33 KV & < ≈ 66 KV ; OPERATIONAL SWITCH</p> <ul style="list-style-type: none"> Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant A pivot table was created from this raw data Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP Data further summarised in the pivot table using operating voltage 11KV, 22KV or 66KV Data further summarised in the pivot table using Object type = D_SWITCH, STN_SWITCH Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP") Resultant data reviewed to ensure that Construct Year is valid or blank Assets totalled by Construct year for those with non blank data summing the results for Object Type = D_SWITCH and STN_SWITCH and Operating Voltage = 66KV The age profile for the total number of assets in the required asset category was constructed using the age profile of 11kV circuit breakers as a proxy. To achieve this the total number of assets was apportioned across the years according to the proxy profile. The resultant age profile was used to populate the table

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013

2013	<p>No other reliable data is readily available for the substitution of blanks in the construct year data</p> <p>The equipment data in SAP is updated from time to time when new data becomes available from any source. That new data is verified and if appropriate written into SAP. The queries undertaken to provide the raw data for this asset age profile use the current available data from the SAP asset management database</p> <p>The reason for selecting and using the proxy age profile is that the age profiles for 11kV circuit breakers is relatively complete with known data and would most effectively represent the expected age profile of the required assets</p>
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F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

<p>Response: Not applicable</p>
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G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	33 KV & < ≈ 66 KV ; CIRCUIT BREAKER

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \right) \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

- a) Not Applicable
- b) Not Applicable
- c) Sub categorisation not applicable to this asset category
- d) Sub categorisation not applicable to this asset category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁵ data green**; and **ESTIMATED²⁶/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

- > 33 KV & < ≈ 66 KV ; CIRCUIT BREAKER
- Raw equipment data extracted from SAP by Query including Object Type

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>> 33 KV & < ≈ 66 KV ; CIRCUIT BREAKER</p> <ul style="list-style-type: none"> • Raw equipment data extracted from SAP by Query including Object Type and Construct Year • A pivot table was created from this raw data • Data summarised by Object Type = CB_66KV • Data filtered to exclude circuit breakers not connected to the network (GIS STATUS does not equal "not connected") • Data filtered to ensure only CitiPower assets identified and counted (Company Code equals "4650") • Resultant data reviewed to ensure that Construct Year is valid or blank • Assets totalled by Construct year for those with non blank data • The total number of Assets with blank Construct Year data was apportioned across the age profile derived from those assets with non blank Construct year • The resultant age profile was used to populate the table

²⁵ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>For those assets with blank Construct year</p> <ul style="list-style-type: none"> Blank Construct year data indicates that the data was not available in the SAP asset management system. This could be a result of the data not being entered or inadvertently overwritten with blanks during previous database system migrations or upgrades. For blanks, data was unable to be verified to confirm actual year of construction No other consistent basis was available to estimate individual construct year data Actual know recorded data has been used wherever possible

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>> 33 KV & < ≈ 66 KV ; CIRCUIT BREAKER</p> <ul style="list-style-type: none"> Raw equipment data extracted from SAP by Query including Object Type and Construct Year A pivot table was created from this raw data Data summarised by Object Type = CB_66KV Data filtered to exclude circuit breakers not connected to the network (GIS STATUS does not equal "not connected") Data filtered to ensure only CitiPower assets identified and counted (Company Code equals "4650") Resultant data reviewed to ensure that Construct Year is valid or blank Assets totalled by Construct year for those with non blank data The total number of Assets with blank Construct Year data was apportioned across the age profile derived from those assets with non blank Construct year The resultant age profile was used to populate the table

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>No other reliable data is readily available for the substitution of blanks in the construct year data</p> <p>The equipment data in SAP is updated from time to time when new data becomes available from any source. That new data is verified and if appropriate written into SAP. The queries undertaken to provide the raw data for this asset age profile use the current available data from the SAP asset management database</p>

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	HV Fuses and Surge Diverters
Variable	AER Definition
Switchgear	These are assets used to control, protect and isolate segments of the network This includes disconnect switches, fuses, circuit breakers, links, reclosers, sectionalisers, ring main units, oil insulated fuses etc.

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

6. ASSET AGE PROFILE

6.1 Table 5.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category asset values are determined by the asset category’s contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

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Please provide a Response in this box:
A sub-category was created under switchgear called "Distribution Fuse / Surge Diverter units" as this expenditure did not fit within the existing sub-categories.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁷ data green**; and **ESTIMATED²⁸/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:
Raw equipment data extracted SAP by Query including Object Type

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<ul style="list-style-type: none">The type and number of Fuse Units and Surge diverter units are recorded in SAP.The individual year of manufacture is not recorded, however the period is, ie 2001-2011.The age profile is based on units manufacture year not when they were installed on the Electricity Network.It was assumed there was an even distribution of units across the manufacture period <p>This analysis was carried out for each of the types of units, the number of all types of units per year were then summated to develop the age profile for Fuse Units and Surge Diverter</p>
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why was an estimate required, including why it is not possible to use actual data;
2009	An estimate was required as the only actual information available on the age of the unit is a time period ie

²⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

²⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	2001-2011
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	In order to develop the age profile, the number and type of each unit was extracted; it was then assumed that there was an even distribution of units across the years of manufacturer. Example if the manufacture period was 10 years (2001-2011) and there were 100 units, the estimate was that 10 units were installed each year.
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	The only other method to establish the age of the units would have been to link them to the age of the pole, this would be less accurate then the method selected.
2010	Refer 2009
2011	Refer 2009
2012	Refer 2009
2013	Refer 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	<≈ 1 KV ; CIRCUIT BREAKER

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Response:

6. ASSET AGE PROFILE

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \right) \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

- a) Not Applicable
- b) Not Applicable
- c) Sub categorisation not applicable to this asset category
- d) Sub categorisation not applicable to this asset category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL²⁹ data green**; and **ESTIMATED³⁰/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

- <≈ 1 KV ; CIRCUIT BREAKER
- Raw equipment data extracted from GIS and SAP by Query including Object Type

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>< <≈ 1 KV ; CIRCUIT BREAKER</p> <ul style="list-style-type: none"> • Raw equipment data extracted from SAP by Query including Object Type and Construct Year • A pivot table was created from this raw data • Data summarised by Object Type = CB_LV • Resultant data reviewed to ensure that Construct Year is valid or blank • Assets summarised where Location=CITIPOWER • Assets totalled by Construct year for those with non blank data • The age profile for the total number of assets in the required asset category was constructed using the age profile of the addition of profiles for Ground/Indoor < = 22KV >600KVA MULTI PHASE and Ground/Indoor < = 22KV >60KVA <=600KVA MULTI PHASE transformers as a proxy. To achieve this the total number of assets was apportioned across the years according to the proxy profile. • The resultant age profile was used to populate the table

²⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>For those assets with blank Construct year</p> <ul style="list-style-type: none"> Blank Construct year data indicates that the data was not available in the SAP asset management system. This could be a result of the data not being entered or inadvertently overwritten with blanks during previous database system migrations or upgrades. For blanks, data was unable to be verified to confirm actual year of construction No other consistent basis was available to estimate individual construct year data Actual know recorded data has been used wherever possible

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the total number of assets using the age profile of indoor transformers greater than 60kVA (addition of profiles for Ground/Indoor < = 22KV >600KVA MULTI PHASE and Ground/Indoor < = 22KV >60KVA <=600KVA MULTI PHASE) as a proxy.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset < <= 1 KV ; CIRCUIT BREAKER</p> <ul style="list-style-type: none"> Raw equipment data extracted from SAP by Query including Object Type and Construct Year A pivot table was created from this raw data Assets summarised where Location=CITIPOWERData summarised by Object Type = CB_LV Resultant data reviewed to ensure that Construct Year is valid or blank Assets totalled by Construct year for those with non blank data The age profile for the total number of assets in the required asset category was constructed using the age profile of the addition of profiles for Ground/Indoor < = 22KV >600KVA MULTI PHASE and Ground/Indoor < = 22KV >60KVA <=600KVA MULTI PHASE transformers as a proxy. To achieve this the total number of assets was apportioned across the years according to the proxy profile. The resultant age profile was used to populate the table

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>No other reliable data is readily available for the substitution of blanks in the construct year data</p> <p>The equipment data in SAP is updated from time to time when new data becomes available from any source. That new data is verified and if appropriate written into SAP. The queries undertaken to provide the raw data for this asset age profile use the current available data from the SAP asset management database</p> <p>The age profile of indoor transformers greater than 60kVA (addition of profiles for Ground/Indoor < = 22KV >600KVA MULTI PHASE and Ground/Indoor < = 22KV >60KVA <=600KVA MULTI PHASE is considered</p>

the best representation of the actual age profile of the <1kV Circuit Breakers.
The circuit breakers are generally considered to have been installed along with the transformers when the substation was originally constructed

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	>1kV & <=11kV ; ISOLATORS, EARTHING SWITCH

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word "REFURBISHED". CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

- a) Not Applicable
- b) Not Applicable
- c) Sub categorisation not applicable to this asset category
- d) Sub categorisation not applicable to this asset category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³¹ data green**; and **ESTIMATED³²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

>1kV & <=11kV ; ISOLATORS, EARTHING SWITCH

- Raw equipment data extracted from SAP by Query including Object Type

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>>1kV & <=11kV ; ISOLATORS, EARTHING SWITCH</p> <ul style="list-style-type: none">• Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant• A pivot table was created from this raw data• Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP• Data further summarised in the pivot table using operating voltage 6.6KV, 11KV, 22KV or 66KV• Data further summarised in the pivot table using Object type = STN_LINK and STN_ETH_SW• Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP")• Resultant data reviewed to ensure that Construct Year is valid or blank• Assets totalled by Construct year for those with non blank data summing the results for Object Type = STN_LINK and STN_ETH_SW and Operating Voltage = 6.6KV and 11KV• The age profile for the total number of assets in the required asset category was constructed using

³¹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>the age profile of 11kV circuit as a proxy. To achieve this the total number of assets was apportioned across the years according to the proxy profile.</p> <ul style="list-style-type: none"> The resultant age profile was used to populate the table
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E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>For those assets with blank Construct year</p> <ul style="list-style-type: none"> Blank Construct year data indicates that the data was not available in the SAP asset management system. This could be a result of the data not being entered or inadvertently overwritten with blanks during previous database system migrations or upgrades. For blanks, data was unable to be verified to confirm actual year of construction No other consistent basis was available to estimate individual construct year data Actual know recorded data has been used wherever possible

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets As most of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the total number of assets across the proxy age profile for 11kV circuit breakers.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset >1kV & <=11kV ; ISOLATORS, EARTHING SWITCH</p> <ul style="list-style-type: none"> Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant A pivot table was created from this raw data Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP Data further summarised in the pivot table using operating voltage 6.6KV, 11KV, 22KV or 66KV Data further summarised in the pivot table using Object type = STN_LINK and STN_ETH_SW Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP") Resultant data reviewed to ensure that Construct Year is valid or blank Assets totalled by Construct year for those with non blank data summing the results for Object Type = STN_LINK and STN_ETH_SW and Operating Voltage = 6.6KV and 11KV The age profile for the total number of assets in the required asset category was constructed using the age profile of 11kV circuit breakers as a proxy. To achieve this the total number of assets was apportioned across the years according to the proxy profile. The resultant age profile was used to populate the table

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	No other reliable data is readily available for the substitution of blanks in the construct year data

The equipment data in SAP is updated from time to time when new data becomes available from any source. That new data is verified and if appropriate written into SAP. The queries undertaken to provide the raw data for this asset age profile use the current available data from the SAP asset management database

The reason for selecting and using the proxy age profile is that the age profiles for 11kV circuit breakers is relatively complete with known data and would most effectively represent the expected age profile of the required assets

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	>11kV & <=22kV ; ISOLATORS, EARTHING SWITCH

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

6. ASSET AGE PROFILE

6.1 Table 5.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word “REFURBISHED”. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower’s distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled “OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY” illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

- a) Not Applicable
- b) Not Applicable
- c) Sub categorisation not applicable to this asset category
- d) Sub categorisation not applicable to this asset category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³³ data green**; and **ESTIMATED³⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

- **>11kV & <=22kV ; ISOLATORS, EARTHING SWITCH**
- Raw equipment data extracted from SAP by Query including Object Type

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>>11kV & <=22kV ; ISOLATORS, EARTHING SWITCH</p> <ul style="list-style-type: none"> • Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant • A pivot table was created from this raw data • Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP • Data further summarised in the pivot table using operating voltage 6.6kV, 11KV, 22KV or 66KV • Data further summarised in the pivot table using Object type = STN_LINK and STN_ETH_SW • Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP") • Resultant data reviewed to ensure that Construct Year is valid or blank • Assets totalled by Construct year for those with non blank data summing the results for Object Type = STN_LINK and STN_ETH_SW and Operating Voltage = 22KV • The age profile for the total number of assets in the required asset category was constructed using the age profile of 11kV circuit as a proxy.

³³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>To achieve this the total number of assets was apportioned across the years according to the proxy profile.</p> <ul style="list-style-type: none"> The resultant age profile was used to populate the table
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E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>For those assets with blank Construct year</p> <ul style="list-style-type: none"> Blank Construct year data indicates that the data was not available in the SAP asset management system. This could be a result of the data not being entered or inadvertently overwritten with blanks during previous database system migrations or upgrades. For blanks, data was unable to be verified to confirm actual year of construction No other consistent basis was available to estimate individual construct year data Actual know recorded data has been used wherever possible

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As most of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the total number of assets across the proxy age profile for 11kV circuit breakers.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset >11kV & <=22kV ; ISOLATORS, EARTHING SWITCH</p> <ul style="list-style-type: none"> Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant A pivot table was created from this raw data Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP Data further summarised in the pivot table using operating voltage 6.6kV, 11KV, 22KV or 66KV Data further summarised in the pivot table using Object type = STN_LINK and STN_ETH_SW Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP") Resultant data reviewed to ensure that Construct Year is valid or blank Assets totalled by Construct year for those with non blank data summing the results for Object Type = STN_LINK and STN_ETH_SW and Operating Voltage = 22KV The age profile for the total number of assets in the required asset category was constructed using the age profile of 11kV circuit breakers as a proxy. To achieve this the total number of assets was apportioned across the years according to the proxy profile. The resultant age profile was used to populate the table

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>No other reliable data is readily available for the substitution of blanks in the construct year data</p> <p>The equipment data in SAP is updated from time to time when new data becomes available from any</p>

source. That new data is verified and if appropriate written into SAP. The queries undertaken to provide the raw data for this asset age profile use the current available data from the SAP asset management database

The reason for selecting and using the proxy age profile is that the age profiles for 11kV circuit breakers is relatively complete with known data and would most effectively represent the expected age profile of the required assets

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Switchgear by: Highest Operating Voltage; Switch Function	>22kV & <=66kV ; ISOLATORS, EARTHING SWITCH

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word "REFURBISHED". CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

- a) Not Applicable
- b) Not Applicable
- c) Sub categorisation not applicable to this asset category
- d) Sub categorisation not applicable to this asset category

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁵ data green**; and **ESTIMATED³⁶/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

- >22kV & <=66kV ; ISOLATORS, EARTHING SWITCH
- Raw equipment data extracted from SAP by Query including Object Type

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets</p> <p>As some of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the number of unknown construct year data assets across the known age profile of the rest of the population.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset</p> <p>>22kV & <=66kV ; ISOLATORS, EARTHING SWITCH</p> <ul style="list-style-type: none"> • Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant • A pivot table was created from this raw data • Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP • Data further summarised in the pivot table using operating voltage 6.6kV, 11KV, 22KV or 66KV • Data further summarised in the pivot table using Object type = STN_LINK and STN_ETH_SW • Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP") • Resultant data reviewed to ensure that Construct Year is valid or blank • Assets totalled by Construct year for those with non blank data summing the results for Object Type = STN_LINK and STN_ETH_SW and Operating Voltage = 66KV • The age profile for the total number of assets in the required asset category was constructed using

³⁵ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

³⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>the age profile of 11kV circuit as a proxy. To achieve this the total number of assets was apportioned across the years according to the proxy profile.</p> <ul style="list-style-type: none"> The resultant age profile was used to populate the table
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E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>For those assets with blank Construct year</p> <ul style="list-style-type: none"> Blank Construct year data indicates that the data was not available in the SAP asset management system. This could be a result of the data not being entered or inadvertently overwritten with blanks during previous database system migrations or upgrades. For blanks, data was unable to be verified to confirm actual year of construction No other consistent basis was available to estimate individual construct year data Actual know recorded data has been used wherever possible

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>Methodology was to extract data from the SAP asset management system to locate and identify the type and construction year of the required assets As most of the assets will not have a known construct year and in the absence of other verified data that would allow assessment and estimation of the relevant construct year the chosen methodology has been to apportion the total number of assets across the proxy age profile for 11kV circuit breakers.</p> <p>This has been considered reasonable in terms of appropriately representing the age profile of the total asset >22kV & <=66kV ; ISOLATORS, EARTHING SWITCH</p> <ul style="list-style-type: none"> Raw equipment data extracted from SAP by Query including Object Type, Construct Year, Operating Voltage, MaintPlant A pivot table was created from this raw data Data summarised in the pivot table using MaintPlant = PAL and MaintPlant = CP Data further summarised in the pivot table using operating voltage 6.6kV, 11KV, 22KV or 66KV Data further summarised in the pivot table using Object type = STN_LINK and STN_ETH_SW Data filtered to ensure only CitiPower assets identified and counted (MaintPlant = "CP") Resultant data reviewed to ensure that Construct Year is valid or blank Assets totalled by Construct year for those with non blank data summing the results for Object Type = STN_LINK and STN_ETH_SW and Operating Voltage = 66KV The age profile for the total number of assets in the required asset category was constructed using the age profile of 11kV circuit breakers as a proxy. To achieve this the total number of assets was apportioned across the years according to the proxy profile. The resultant age profile was used to populate the table

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	No other reliable data is readily available for the substitution of blanks in the construct year data

The equipment data in SAP is updated from time to time when new data becomes available from any source. That new data is verified and if appropriate written into SAP. The queries undertaken to provide the raw data for this asset age profile use the current available data from the SAP asset management database

The reason for selecting and using the proxy age profile is that the age profiles for 11kV circuit breakers is relatively complete with known data and would most effectively represent the expected age profile of the required assets

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
Public Lighting by : Asset Type; Lighting Obligation	(ALL Categories)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

6. ASSET AGE PROFILE

6.1 Table 5.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word "REFURBISHED". CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \right) \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Definitions

Major road: Roads on which the visual requirements of motorists are dominant (e.g. traffic routes). Typically the responsibility of a state or territory road authority.

Minor road: Roads on which the visual requirements of pedestrians are dominant (e.g. local roads and lighting that is applicable to areas other than roads outdoor public areas, e.g. outdoor shopping). Typically the responsibility of a local Government authority.

Please provide a Response in this box:

With regard to the Final Distribution Category Analysis RIN issued 7th March 2014, 5.2.1 Asset Age Profile by asset category for Public Lighting. We have provided data that complies with the instructions and definitions specified in the requirements of the notice as follows:

6.1

- (a) We have provided asset sub-categories corresponding to the prescribed asset categories in Table 2.2.1.
- (b) not applicable
- (c) not applicable
- (d) not applicable

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁷ data green**; and **ESTIMATED³⁸/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

LUMINAIRES ; MAJOR/MINOR ROAD ; STANDARD CONTROL :

- Based on data extracted from GIS (asset management system) from log saved on 01/01/14 listing all in service and billable luminaire details for Powercor and CitiPower.

BRACKETS ; MAJOR/MINOR ROAD ; STANDARD CONTROL

- No data is available (see F. No data provided)

LAMPS ; MAJOR/MINOR ROAD ; STANDARD CONTROL

- Based on data extracted from GIS (asset management system) from log saved on 01/01/14 listing all in service and billable luminaire details for Powercor and CitiPower.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>LUMINAIRES ; MAJOR/MINOR ROAD ; STANDARD CONTROL</p> <p>Methodology</p> <ul style="list-style-type: none"> • Per definition of “assets in commission” only in service and billable lights as at 1/1/14 were extracted from GIS. • Asset quantity recorded were allocated across the years 1910 – 2013 using information recorded relating to “year lantern manufactured” or “year lantern changed”. <p>Assumptions</p> <ul style="list-style-type: none"> • Only in service and billable lights were reported • ‘Cost Share Status’ was used to separate between Major Road (‘Cost Shared (4/10)(6/10)’) and Minor Road (‘Full Cost (Municipality)’) in order to meet the definition of major/minor roads per the RIN. • Where ‘Year Lantern Changed’ = 1960, 1970 & 2001 and ‘Year Lantern Manufactured’ varied, ‘Year Lantern Manufactured’ was used in preference to ‘Year Lantern Changed’. • Where ‘Year Lantern Changed’ ≠ 1960, 1970 & 2001, no change was made and ‘Year Lantern

³⁷ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

³⁸ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

	<p>Changed' was taken to represent the year the asset was commissioned.</p> <ul style="list-style-type: none"> Where 'Cost Share Status' = 'Full Cost (VicRoads) or 'other', these were added to 'Cost Shared (4/10)(6/10)' *** Note: this only affected 14 lights in total <p>BRACKETS ; MAJOR/MINOR ROAD ; STANDARD CONTROL</p> <ul style="list-style-type: none"> No data is available <p>LAMPS ; MAJOR/MINOR ROAD ; STANDARD CONTROL</p> <p>Methodology</p> <ul style="list-style-type: none"> Per definition of "assets in commission" only in service and billable lights as at 1/1/14 were extracted from GIS. Asset quantities recorded were allocated across the years 1910 – 2013 using information recorded relating to "year lamp changed". <p>Assumptions</p> <ul style="list-style-type: none"> 'Cost Share Status' was used to separate between Major Road ('Cost Shared (4/10)(6/10)') and Minor Road ('Full Cost (Municipality)') in order to meet the definition of major/minor roads per the RIN. Where 'Cost Share Status' = 'Full Cost (VicRoads) or 'other', these were added to 'Cost Shared (4/10)(6/10)' *** Note: this only affected 14 lights in total
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	<ul style="list-style-type: none"> LUMINAIRES ; MAJOR/MINOR ROAD ; STANDARD CONTROL :Significant data was unusable due to 'default' dates being used for 'Date Lantern Changed' such as '1/01/1960', '1/01/1970' & '1/08/2001'. A separate field was also available 'Year Lantern Manufactured', this year was also compromised as it appeared that it had not been maintained throughout the time period. Data was unable to be verified to confirm actual year of replacement due to data migration to GIS. Data entered has not been consistently validated to ensure that accuracy was correctly entered. Assumptions listed above were used to provide a slightly more accurate age profile of Luminaires, however there are still large gaps and default dates still used that distorts the data. <p>BRACKETS ; MAJOR/MINOR ROAD ; STANDARD CONTROL</p> <ul style="list-style-type: none"> The business has not historically retained any data on brackets. We are unable to provide any usable data for this subsection. <p>LAMPS ; MAJOR/MINOR ROAD ; STANDARD CONTROL</p> <ul style="list-style-type: none"> Data was unable to be verified to confirm actual year of replacement due to data migration to GIS. Data entered has not been consistently validated to ensure that accuracy was correctly entered. Audits are currently undertaken to verify our metrology compliance, however there this additional information is not captured.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>LUMINAIRES ; MAJOR/MINOR ROAD ; STANDARD</p> <p>Assumptions</p> <ul style="list-style-type: none"> 'Cost Share Status' was used to separate between Major Road ('Cost Shared (4/10)(6/10)') and Minor Road ('Full Cost (Municipality)') in order to meet the definition of major/minor roads per the RIN. The major and minor road classifications maintained within GIS relate to the type of globe used rather than the road location and hence these internal classifications did meet the definitions in the RIN. Where 'Year Lantern Changed' = 1960, 1970 & 2001 and 'Year Lantern Manufactured' varied, 'Year Lantern Manufactured' was used in preference to 'Year Lantern Changed' in order to reduce the

	<p>distortion caused by default dates as these were assumed to be more accurate dates.</p> <ul style="list-style-type: none"> Where 'Cost Share Status' = 'Full Cost (VicRoads) or 'other', these were added to 'Cost Shared (4/10)(6/10)' *** Note: this only affected 14 lights in total. The was because lights fully allocated to VicRoads were reasonably assumed to be on major roads and hence included in that category. <p>BRACKETS ; MAJOR/MINOR ROAD ; STANDARD CONTROL</p> <ul style="list-style-type: none"> No data is available <p>LAMPS ; MAJOR/MINOR ROAD ; STANDARD CONTROL</p> <p>Assumptions</p> <ul style="list-style-type: none"> 'Cost Share Status' was used to separate between Major Road ('Cost Shared (4/10)(6/10)') and Minor Road ('Full Cost (Municipality)') in order to meet the definition of major/minor roads per the RIN. The major and minor road classifications maintained within GIS relate to the type of globe used rather than the road location and hence these internal classifications do meet the definitions in the RIN. Where 'Cost Share Status' = 'Full Cost (VicRoads) or 'other', these were added to 'Cost Shared (4/10)(6/10)' *** Note: this only affected 14 lights in total. The was because lights fully allocated to VicRoads were reasonably assumed to be on major roads and hence included in that category.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	<ul style="list-style-type: none"> As noted above the method of estimation used most closely aligned with the requirements of RIN and provided the most reliable data.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

<p>Response: BRACKETS ; MAJOR/MINOR ROAD ; STANDARD CONTROL</p> <ul style="list-style-type: none"> The business has not historically retained any data on brackets. We are unable to provide any usable data for this subsection.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	FIELD DEVICES - ZONE SUBSTATION RELAYS (ELECTROMECHANICAL)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Field device category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'FIELD DEVICES' a sub Asset Category has been specified to capture Electronic relays at Zone Substation 'ZONE SUBSTATION RELAYS (ELECTROMECHANICAL)'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL³⁹ data green**; and **ESTIMATED⁴⁰/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data is Sourced from the Relay Setting Information System (RESIS). SAP project data is used to qualify RESIS data.

³⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2010	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2011	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2012	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2013	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	A data migration occurred moving CitiPower Relay settings in to the Powercor RESIS system in 2009. It is assumed that all data was transferred and available at the time but this can not be verified. The available data was used to establish the asset quantities.
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Available RESIS data and process is used as per later years
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	This was the only available data.
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	FIELD DEVICES - ZONE SUBSTATION RELAYS (ELECTRONIC)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Field device category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'FIELD DEVICES' a sub Asset Category has been specified to capture Electronic relays at Zone Substation 'ZONE SUBSTATION RELAYS (ELECTRONIC)'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴¹ data green**; and **ESTIMATED⁴²/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data is Sourced from the Relay Setting Information System (RESIS). SAP project data is used to qualify RESIS data.

⁴¹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2010	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2011	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2012	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2013	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	A data migration occurred moving CitiPower Relay settings in to the Powercor RESIS system in 2009. It is assumed that all data was transferred and available at the time but this cannot be verified. The available data was used to establish the asset quantities.
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Available RESIS data and process is used as per later years
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	This was the only available data.
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	FIELD DEVICES - ZONE SUBSTATION RELAYS (DIGITAL)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Field device category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'FIELD DEVICES' a sub Asset Category has been specified to capture Digital relays at Zone Substation 'ZONE SUBSTATION RELAYS (DIGITAL)'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴³ data green**; and **ESTIMATED⁴⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data is Sourced from the Relay Setting Information System (RESIS). SAP project data is used to qualify RESIS data.

⁴³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2010	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2011	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2012	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.
2013	Data is Sourced from the Relay Setting Information System (RESIS) via a report of 'Applied Settings' to determine new or changed relay settings. This 'applied setting' data is obtained for the calendar year and is then manually filtered to remove any applied setting updates relating to retained equipment. Data from SAP relating to projects during the period was also utilised to ensure additions and retirements were correct for each period.

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	A data migration occurred moving CitiPower Relay settings in to the Powercor RESIS system in 2009. It is assumed that all data was transferred and available at the time but this cannot be verified. The available data was used to establish the asset quantities.
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Available RESIS data and process is used as per later years
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	This was the only available data.
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	FIELD DEVICES - ZONE SUBSTATION CONTROLS

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Field device category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'FIELD DEVICES' a sub Asset Category has been specified to capture control equipment at Zone Substation 'ZONE SUBSTATION CONTROLS'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁵ data green**; and **ESTIMATED⁴⁶/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data is Sourced from the Relay Setting Information System (RESIS) and Zone Substation Drawing system (ProjectWise).

⁴⁵ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Asset details and quantities are obtained from the report of 'Applied Settings' for control equipment run from RESIS or through details gathered from zone substation drawings in Projectwise (note, not all control equipment has a setting in RESIS and therefore Projectwise drawings are used). Assets are allocated across the years based on the drawing dates from Projectwise. Project/drawing dates per Projectwise were considered approximate to the year of installation
2010	Refer 2009.
2011	Refer 2009.
2012	Refer 2009.
2013	Refer 2009.

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Asset data in RESIS does not provide installation dates for this particular asset category and hence Projectwise was the only available record with approximate dates
2010	Refer 2009.
2011	Refer 2009.
2012	Refer 2009.
2013	Refer 2009.

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Assets are allocated across the years based on the drawing dates from Projectwise. Project/drawing dates per Projectwise were considered approximate to the year of installation.
2010	Refer 2009.
2011	Refer 2009.
2012	Refer 2009.
2013	Refer 2009.

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	There was no other practical method to determined age profile
2010	Refer 2009.
2011	Refer 2009.
2012	Refer 2009.
2013	Refer 2009.

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	FIELD DEVICES - ZONE SUBSTATION RTU'S

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Field device category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'FIELD DEVICES' a sub Asset Category has been specified to capture RTUs at Zone Substation 'ZONE SUBSTATION RTU'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁷ data green**; and **ESTIMATED⁴⁸/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data has been sourced from SCADA (Poweron Fusion) via reports of all connected field devices.

⁴⁷ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁴⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Based on SCADA Report of connected Field devices run as at 31 Dec 2011. Using information included in the reports, allocate field devices as either relating CitiPower or Powercor and zone substations or distribution stations. Using engineering advice to spread RTU installs across most probable years of construction.
2010	As per 2009
2011	As per 2009
2012	Based on SCADA Report of connected Field Devices run as at 31 Dec. Using information included in the reports, allocate field devices as either relating CitiPower or Powercor and zone substations or distribution stations. The data as at 31 Dec is then compared to the same report from the previous year to identify the assets added in the year. In this year there is a step increase in quantities as all RTU's used as collector or control RTUs have now been added in. This has not been spread across the years of install as there is in sufficient information on install dates.
2013	Based on SCADA Report of connected Field Devices run as at 31 Dec. Using information included in the reports, allocate field devices as either relating CitiPower or Powercor and zone substations or distribution stations. The data as at 31 Dec is then compared to the same report from the previous year to identify the assets added in the year

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	SCADA is a dynamic and hence reports cannot be run retrospectively. Given SCADA report was first ran at the end of Dec 2011, CitiPower has had to estimate the spread of this data for 2011 and earlier.
2010	As Per 2009
2011	As Per 2009
2012	SCADA is a dynamic and hence reports cannot be run retrospectively. In this year there is a step increase in quantities as all RTU's used as collector or control RTUs have now been added in. This has not been spread across the years of install as there is in sufficient information on install dates.
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The age profile for 2011 and earlier was based on the total known SCADA connections as of the end of 2011. Using engineering advice, RTU installations were spread across most probable years of construction.
2010	As per 2009
2011	As Per 2009
2012	In this year there is a step increase in quantities as all RTU's used as collector or control RTUs have now been added in. This has not been spread across the years as there is significant effort and lack of information in determining an age profile.
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	This was the most practical method for determining an age profile
2010	As Per 2009
2011	As Per 2009
2012	There is a lack of information and much effort required to determine an age profile
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	FIELD DEVICES - DISTRIBUTION RTU'S

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Field device category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'FIELD DEVICES' a sub Asset Category has been specified to capture RTUs outside Zone Substations 'DISTRIBUTION RTU'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁴⁹ data green**; and **ESTIMATED⁵⁰/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data has been sourced from SCADA (Poweron Fusion) via reports of all connected field devices. SAP project data is used to qualify SCADA reports for 2011 and earlier.

⁴⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Based on a SCADA Report of connected field devices run as at 31 Dec 2011. Data from SAP relating to projects during the period 2011 and before was utilised in assisting with determining age of equipment across years. Field device types from the SCADA report was also utilised to allocate equipment across years on a proportional basis for the years 2011 and before.
2010	As per 2009
2011	As per 2009
2012	Based on SCADA Report of Connected Field devices run as at 31 Dec. Using information included in the reports allocate field devices as either relating CitiPower or Powercor and zone substations or distribution stations. The data as at 31 Dec is then compared to the same report from the previous year to identify the assets added in each year.
2013	As per 2012

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	SCADA is a dynamic and hence reports cannot be run retrospectively. Given SCADA report was first ran at the of end Dec 2011, CitiPower has had to estimate the spread of this data for 2011 and earlier.
2010	As Per 2009
2011	As Per 2009
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The age profile for 2011 and earlier was based on the total known SCADA connections as of the end of 2011 and known completed projects that could be identified from SAP for 2011 and earlier. The balance was determined from equipment types from the SCADA report and allocated on a proportional basis across specific years based on engineering advice when a device type was being deployed within the business.
2010	As per 2009
2011	As Per 2009
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	This was the most practical method for determining an age profile
2010	As Per 2009
2011	As Per 2009
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
SCADA, Network Control and Protection Systems	Local Network Wiring Assets

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

Please provide a Response in this box:

CitiPower does not record separately identifiable data relating to Local Network Wiring Assets within SCADA, Network, Control and Protection Systems as wiring components are included within other asset types eg RTUs and Relays. Further, estimation techniques were considered impossible due to the lack of data and immeasurable number of assumptions required.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵¹ data green**; and **ESTIMATED⁵²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:
Not Applicable

⁵¹ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: CitiPower does not collect this data in any system. Local Network Wiring is always associated with Protection or Control systems and tested and replaced with these systems and is not replaced in isolation.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	ZONE SUBSTATION ANALOGUE COMMUNICATION

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Communication Network Asset category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'COMMUNICATIONS NETWORK ASSETS' a sub Asset Category has been specified to capture old analogue based communications equipment at Zone Substation 'ZONE SUBSTATION ANALOGUE COMMUNICATION'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵³ data green**; and **ESTIMATED⁵⁴/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

⁵³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Data was sourced from drawings within Projectwise drawing management system.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Details of all zone substation equipment and equipment types relating to this asset category were extracted from Projectwise as at 31 Dec 2011. Purchase dates for equipment types were established from Projectwise or engineering experience. -Equipment was allocated for 2011 and earlier years based on the equipment types and known purchase dates. Where equipment types were purchased over a time period the middle date of the period was used as an install date. -Additional projects were tracked for subsequent years and updated as required. Note: there were no projects in 2012 and 2013.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	CitiPower was not required to report on asset quantities in this category during 2009/2010 hence there was no available data kept or stored for these years. Further, asset data in CitiPower's asset management system does not provide installation dates for this particular asset category and hence Projectwise was the only available record with approximate dates.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Purchase dates for equipment types were established from Projectwise or engineering experience. Equipment was allocated for 2011 and earlier years based on the equipment types and known purchase dates. Where equipment types were purchased over a time period the middle date of the period was used as an install date. Where Projectwise could not provide dates, engineering experience was used to assess equipment type and nominate install date.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	This was the most practical method to determine an age profile
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	ZONE SUBSTATION DIGITAL COMMUNICATION

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Communication Network Asset category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'COMMUNICATIONS NETWORK ASSETS' a sub Asset Category has been specified to capture digital based communications equipment at Zone Substation 'ZONE SUBSTATION DIGITAL COMMUNICATION'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁵ data green**; and **ESTIMATED⁵⁶/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

⁵⁵ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Data was sourced from drawings within Projectwise drawing management system.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Details of all zone substation equipment and equipment types relating to this asset category were extracted from Projectwise as at 31 Dec 2011. Purchase dates for equipment types were established from Projectwise or engineering experience. -Equipment was allocated for 2011 and earlier years based on the equipment types and known purchase dates. Where equipment types were purchased over a time period the middle date of the period was used as an install date. -Additional projects were tracked for subsequent years and updated as required. Note: there were no projects in 2012 and 2013.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	CitiPower was not required to report on asset quantities in this category during 2009/2010 hence there was no available data kept or stored for these years. Further, asset data in CitiPower's asset management system does not provide installation dates for this particular asset category and hence Projectwise was the only available record with approximate dates.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Purchase dates for equipment types were established from Projectwise or engineering experience. Equipment was allocated for 2011 and earlier years based on the equipment types and known purchase dates. Where equipment types were purchased over a time period the middle date of the period was used as an install date. Where Projectwise could not provide dates, engineering experience was used to assess equipment type and nominate install date.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	This was the most practical method to determine an age profile
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	ZONE SUBSTATION ETHERNET COMMUNICATION

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Communication Network Asset category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'COMMUNICATIONS NETWORK ASSETS' a sub Asset Category has been specified to capture Ethernet based communications equipment at Zone Substation 'ZONE SUBSTATION ETHERNET COMMUNICATION'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁷ data green**; and **ESTIMATED⁵⁸/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data has been sourced from the SCADA – Network Management System Tool. SAP project data is used to qualify

⁵⁷ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁵⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Network Management System data.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	The first SCADA Report of Ethernet Equipment Data run as at 31 Dec 2011. Projects/assets added in 2011 per SAP project data were deducted from the total quantity and the remainder allocated across 2008-2010. Assumed allocation for 2010 and earlier based on available SAP project data relating to projects occurring during the period.
2010	As per 2009
2011	SCADA Report of Ethernet Equipment Data run as at 31 Dec from Network Management System Tool. Projects/assets added in 2011 per SAP project data were deducted from the total quantity. The project data for this year was known as it related to current projects.
2012	SCADA Report of Ethernet Equipment Data run as at 31 Dec from Network Management System Tool. The data as at 31 Dec is then compared to the same report from the previous year to identify the assets added in each year.
2013	As per 2012

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	The Network Management System Tool is a dynamic system and hence reports cannot be run retrospectively. Given SCADA Report of Ethernet ran as of end Dec was not run for this year, CitiPower has had to estimate this data based on SAP project data.
2010	As per 2009
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Estimate for 2010 and earlier based on available SAP project data relating to projects occurring during the period.
2010	As per 2009
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	Reviewing the SAP project data was the most practical method of determining projects and scopes completed within a time period.
2010	As per 2009
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	DISTRIBUTION FIELD DEVICE COMMUNICATIONS

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Communication Network Asset category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'COMMUNICATIONS NETWORK ASSETS' a sub Asset Category has been specified to capture Distribution Field based communications equipment outside the Zone Substation 'DISTRIBUTION FIELD DEVICE COMMUNICATIONS'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁵⁹ data green**; and **ESTIMATED⁶⁰/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

⁵⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Response:

Data has been sourced from SCADA (Poweron Fusion & PQM Server) via reports of all connected field devices. SAP project data is used to qualify SCADA reports for 2011 and earlier.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Based on a SCADA Report of connected field devices run as at 31 Dec 2011. Data from SAP relating to projects during the period 2011 and before was utilised in assisting with determining age of equipment across years. Field device types from the SCADA report was also utilised to allocate equipment across years on a proportional basis for the years 2011 and before. In CitiPower not all connected field devices have an associated communications device – this is determined from field device types installed and those field device types not requiring a communications device have been excluded.
2010	As per 2009
2011	As per 2009
2012	Based on SCADA Report of Connected Field devices run as at 31 Dec. Using information included in the reports allocate field devices as either relating CitiPower or Powercor and zone substations or distribution stations. The data as at 31 Dec is then compared to the same report from the previous year to identify the assets added in each year. In CitiPower not all connected field devices have an associated communications device – this is determined from field device types installed and those field device types not requiring a communications device have been excluded.
2013	As per 2012

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	SCADA is a dynamic and hence reports cannot be run retrospectively. Given SCADA report was first ran at the end of Dec 2011, CitiPower has had to estimate the spread of this data for 2011 and earlier.
2010	As Per 2009
2011	As Per 2009
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The age profile for 2011 and earlier was based on the total known SCADA connections as of the end of 2011 and known completed projects that could be identified from SAP for 2011 and earlier. The balance was determined from equipment types from the SCADA report and allocated on a proportional basis across specific years based on engineering advice when a device type was being deployed within the business.
2010	As per 2009
2011	As Per 2009
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	This was the most practical method for determining an age profile
2010	As Per 2009
2011	As Per 2009
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response: Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	FIBRE OPTIC CABLE

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Communication Network Asset category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'COMMUNICATIONS NETWORK ASSETS' a sub Asset Category has been specified to capture the installation of Fibre Optic Cable outside the Zone Substation 'FIBRE OPTIC CABLE.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶¹ data green**; and **ESTIMATED⁶²/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Total fibre optic cable in network has been sourced from the PNI (Physical Network Inventory) module of GIS. GIS is

⁶¹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

CitiPower's asset management system. Page: 116

This system captures all Fibre Optic Cable assets. SAP project data is used to qualify PNI data. SAP project data is also used to identify fibre projects undertaken during a period.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Report run from PNI/GIS system which details fibre cable length installed against year and report run from PNI/GIS system which provides total fibre cable length installed in network. Data from SAP relating to projects undertaken during the period and some fibre cables with install dates recorded in PNI/GIS was utilised to apportion fibre cable length for each year. Balance of fibre cable length was apportioned across a number of years when fibre was known to being installed.
2010	As per 2009
2011	As per 2009
2012	Report run from PNI/GIS system which details cable length installed against year. From 2012, year of install dates are required to be set for fibre cables added to PNI/GIS.
2013	As per 2012

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	An estimate is required as not all fibre lengths captured in PNI/GIS have an install date included against an asset.
2010	As Per 2009
2011	As Per 2009
2012	Not Applicable
2013	Not Applicable

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Known fibre projects identified through SAP was used to identify the time frame of a number of fibre installations however there was still an amount of cable that had to be apportioned. This balance was apportioned evenly across a number of years when fibre was known to being installed.
2010	As Per 2009
2011	As Per 2009
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	It was considered that this method was the most practical and would provide a relatively accurate age profile.
2010	As per 2009
2011	As per 2009
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	MASTER STATION ASSETS - CLIENT

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Master Station Assets category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'MASTER STATION ASSETS' a sub Asset Category has been specified to capture Client hardware within the SCADA environment called 'CLIENT'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶³ data green**; and **ESTIMATED⁶⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data was sourced from an asset spreadsheet that is manually maintained by the SCADA Team when equipment is added and removed from the SCADA system. This spreadsheet lists all SCADA equipment for production and

⁶³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

development systems and lists Asset Number and age.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Asset life is determined from the asset spreadsheet using the age listed in the spreadsheet to determine year of install. Equipment has been apportioned between Powercor and CitiPower. The assumption is a 70%/30% split based on the ratio of customers between the two businesses as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	The equipment in the spreadsheet is not nominated to a business and both the production and development systems are used across both businesses.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The basis of the ratio split reflects the ratio of customers split across the two businesses. 70% Powercor and 30% CitiPower as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	The split based on customers reflects the use of SCADA by operations and the relative amount of data for each network.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	MASTER STATION ASSETS - FEP

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Master Station Assets category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'MASTER STATION ASSETS' a sub Asset Category has been specified to capture Front End Processor (FEP) hardware within the SCADA environment called 'FEP'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶⁵ data green**; and **ESTIMATED⁶⁶/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data was sourced from an asset spreadsheet that is manually maintained by the SCADA Team when equipment is added and removed from the SCADA system. This spreadsheet lists all SCADA equipment for production and

⁶⁵ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

development systems and lists Asset Number and age.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Asset life is determined from the asset spreadsheet using the age listed in the spreadsheet to determine year of install. Equipment has been apportioned between Powercor and CitiPower. The assumption is a 70%/30% split based on the ratio of customers between the two businesses as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	The equipment in the spreadsheet is not nominated to a business and both the production and development systems are used across both businesses.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The basis of the ratio split reflects the ratio of customers split across the two businesses. 70% Powercor and 30% CitiPower as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	The split based on customers reflects the use of SCADA by operations and the relative amount of data for each network.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	MASTER STATION ASSETS - ROUTER

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Master Station Assets category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'MASTER STATION ASSETS' a sub Asset Category has been specified to capture Router hardware within the SCADA environment called 'ROUTER'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶⁷ data green**; and **ESTIMATED⁶⁸/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data was sourced from an asset spreadsheet that is manually maintained by the SCADA Team when equipment is added and removed from the SCADA system. This spreadsheet lists all SCADA equipment for production and

⁶⁷ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁶⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

development systems and lists Asset Number and age.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Asset life is determined from the asset spreadsheet using the age listed in the spreadsheet to determine year of install. Equipment has been apportioned between Powercor and CitiPower. The assumption is a 70%/30% split based on the ratio of customers between the two businesses as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	The equipment in the spreadsheet is not nominated to a business and both the production and development systems are used across both businesses.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The basis of the ratio split reflects the ratio of customers split across the two businesses. 70% Powercor and 30% CitiPower as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	The split based on customers reflects the use of SCADA by operations and the relative amount of data for each network.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	MASTER STATION ASSETS - SECURITY DEVICE

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Master Station Assets category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'MASTER STATION ASSETS' a sub Asset Category has been specified to capture Security Device hardware within the SCADA environment called 'SECURITY DEVICE'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁶⁹ data green**; and **ESTIMATED⁷⁰/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data was sourced from an asset spreadsheet that is manually maintained by the SCADA Team when equipment is added and removed from the SCADA system. This spreadsheet lists all SCADA equipment for production and

⁶⁹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁰ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

development systems and lists Asset Number and age.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Asset life is determined from the asset spreadsheet using the age listed in the spreadsheet to determine year of install. Equipment has been apportioned between Powercor and CitiPower. The assumption is a 70%/30% split based on the ratio of customers between the two businesses as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	The equipment in the spreadsheet is not nominated to a business and both the production and development systems are used across both businesses.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The basis of the ratio split reflects the ratio of customers split across the two businesses. 70% Powercor and 30% CitiPower as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	The split based on customers reflects the use of SCADA by operations and the relative amount of data for each network.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	MASTER STATION ASSETS - SERVER

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Master Station Assets category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'MASTER STATION ASSETS' a sub Asset Category has been specified to capture Server hardware within the SCADA environment called 'SERVER'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷¹ data green**; and **ESTIMATED⁷²/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data was sourced from an asset spreadsheet that is manually maintained by the SCADA Team when equipment is added and removed from the SCADA system. This spreadsheet lists all SCADA equipment for production and

⁷¹ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷² "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

development systems and lists Asset Number and age.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Asset life is determined from the asset spreadsheet using the age listed in the spreadsheet to determine year of install. Equipment has been apportioned between Powercor and CitiPower. The assumption is a 70%/30% split based on the ratio of customers between the two businesses as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	The equipment in the spreadsheet is not nominated to a business and both the production and development systems are used across both businesses.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The basis of the ratio split reflects the ratio of customers split across the two businesses. 70% Powercor and 30% CitiPower as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	The split based on customers reflects the use of SCADA by operations and the relative amount of data for each network.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 - Asset age profile	
ASSET GROUP	ASSET CATEGORY
SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS	MASTER STATION ASSETS - SWITCH

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

[The requirements are taken from the CA RIN itself and the AER CA RIN Explanatory Statement. The intent of this section is for data providers to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

The requirements will need to be copied and pasted for each variable covered by this template. The data providers then respond using the 'response' box below.]

Copy and paste the Requirements of the Notice in this box:

c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's *distribution system*, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in *regulatory template 2.2* as per its respective instructions.

Response: There is a need to clearly distinguish equipment types within the Master Station Assets category.

Within the Asset Group 'SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS', Asset Category 'MASTER STATION ASSETS' a sub Asset Category has been specified to capture Switch hardware within the SCADA environment called 'SWITCH'.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷³ data green**; and **ESTIMATED⁷⁴/derived data red**

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data was sourced from an asset spreadsheet that is manually maintained by the SCADA Team when equipment is added and removed from the SCADA system. This spreadsheet lists all SCADA equipment for production and

⁷³ "Actual Information" is defined as "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

development systems and lists Asset Number and age.

D. Methodology & Assumptions (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	Asset life is determined from the asset spreadsheet using the age listed in the spreadsheet to determine year of install. Equipment has been apportioned between Powercor and CitiPower. The assumption is a 70%/30% split based on the ratio of customers between the two businesses as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Appendix E: Principles and Requirements Section 2.4(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	The equipment in the spreadsheet is not nominated to a business and both the production and development systems are used across both businesses.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	The basis of the ratio split reflects the ratio of customers split across the two businesses. 70% Powercor and 30% CitiPower as published on the CitiPower Website.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate.
2009	The split based on customers reflects the use of SCADA by operations and the relative amount of data for each network.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
Not Applicable

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset Age Profile	
Table name: 5.2.1 - Asset Age Profile	
Asset Group	Asset
SCADA	Automation Replacement Expenditure (FC166) - (No Age Profile Required)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

APPENDIX E: PRINCIPLES AND REQUIREMENTS

3. BASIS OF PREPARATION

3.1 CitiPower must explain, for all information in the regulatory templates, the basis upon which CitiPower prepared information to populate the input cells (basis of preparation).

3.2 The basis of preparation must be a separate document (or documents) that CitiPower submits with its completed regulatory templates.

3.3 The basis of preparation must follow a logical structure that enables auditors, assurance practitioners and the AER to clearly understand how CitiPower has complied with the requirements of this Notice.

3.4 At a minimum, the basis of preparation must:

- (a) demonstrate how the information provided is consistent with the requirements of the Notice;
- (b) explain the source from which CitiPower obtained the information provided;
- (c) explain the methodology CitiPower used to provide the required information, including any assumptions CitiPower made; and
- (d) explain circumstances where CitiPower cannot provide input for a variable using actual information, and therefore must provide estimated information:
 - (i) why an estimate was required, including why it was not possible for CitiPower to use actual information;
 - (ii) the basis for the estimate, including the approach used, assumptions made and reasons why the estimate is CitiPower's best estimate, given the information sought in the Notice.

6. ASSET AGE PROFILE

6.1 Table 5.2.1 instructions:

(a) Where CitiPower provides asset sub-categories corresponding to the prescribed asset categories in Table 5.2.1, CitiPower must ensure that the expenditure and asset replacement / asset failure volumes of these sub-categories reconcile to the higher level asset category. CitiPower is required to insert additional rows and provide a clear indication of the asset category applicable to each sub-category. CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its instructions.

(b) In instances where CitiPower is reporting expenditure associated with asset refurbishments/ life extensions capex it must insert additional rows at the bottom of the table for the relevant asset group to account for this. CitiPower must provide the required data, applying the corresponding asset category name followed by the word "REFURBISHED". CitiPower must provide corresponding replacement expenditure data in regulatory template 2.2 as per its respective instructions.

(c) In instances where CitiPower considers that both the prescribed asset group categories and the asset sub-categorisation do not account for an asset on CitiPower's distribution system, CitiPower must insert additional rows below the relevant asset group to account for this. CitiPower must provide the required data, applying a high level descriptor of the asset as the category name. The line item titled "OTHER - PLEASE ADD A ROW IF NECESSARY AND NOMINATE THE CATEGORY" illustrates this requirement. CitiPower must provide corresponding age profile data in regulatory template 2.2 as per its respective instructions.

(d) In instances where CitiPower wishes to provide asset sub-categories in addition to the specified asset categories in table 5.2.1, CitiPower must provide a weighted average asset economic life, including mean and standard deviation that reconciles to the specified asset category in accordance with the following formula:

$$\text{Economic life of asset category} = \sum_{i=1}^n \left(\frac{\text{value of asset sub-category}_i}{\text{total value of asset category}} \times \text{economic life of asset sub-category}_i \right)$$

where:

n is the number of sub-categories to reconcile with the asset category

Asset values are determined by the asset category's contribution to the current replacement cost of the network. This being the most recent per unit cost of replacement for each asset, multiplied by the number of those assets in service and reported in the asset age profile.

Please provide a Response in this box:

Function Code 166 projects for Automation Replacement Expenditure in CitiPower typically involved the installation of new:

- Automatic Circuit Reclosers (ACR's)

These assets are included in the respective Age Profiles for their asset classes, hence no asset Age Profiles are applicable for this Function Code.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁵ data green**; and **ESTIMATED⁷⁶/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:
Not applicable

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	These assets are already included in the respective Age Profiles for their asset classes, hence no asset Age Profiles are applicable for this Function Code.
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

⁷⁵ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁶ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	These assets are already included in the respective Age Profiles for their asset classes, hence no asset Age Profiles are applicable for this Function Code.
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	These assets are already included in the respective Age Profiles for their asset classes, hence no asset Age Profiles are applicable for this Function Code.
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	These assets are already included in the respective Age Profiles for their asset classes, hence no asset Age Profiles are applicable for this Function Code.
2010	As for 2009
2011	As for 2009
2012	As for 2009
2013	As for 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:
These assets are already included in the respective Age Profiles for their asset classes, hence no asset Age Profiles are applicable for this Function Code.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

AER CATEGORY ANALYSIS RIN

Tab name: 5.2 Asset age profile	
Table name: 5.2.1 Asset age profile	
Asset Group	Asset Category
ALL	ALL (ECONOMIC LIFE (YEARS) - MEAN and STANDARD DEVIATION)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN)

Requirements of the notice:

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in "Appendix E: Principles and Requirements", and "Appendix F: Definitions". **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

No specific requirements in the RIN. Table 5.2.1 requests the Mean Economic Life and Standard Deviation of each Asset Category.

Please provide a Response in this box:

Data required was provided for each Asset Category containing Age Profile information.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁷ data green**; and **ESTIMATED⁷⁸/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Mean Life and Standard Deviation data for the Asset Categories in Table 5.2.1 was obtained from Consultant's Reports Parsons Brinckerhoff (PB 2010), Accounting Lives (Financial Workbook) and Public Lighting Model (RAB).

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

⁷⁷ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁷⁸ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	<p>The purpose of this methodology is to describe the process undertaken to allocate a Mean Life and Standard Deviation, year quantity as requested by the AER for Table 5.2.1 – Asset Age Profile.</p> <p>To ensure a consistent approach was applied in providing a Mean Life and Standard Deviation across each of the Asset groups, PB2010 consultant’s report was utilised for the Mean Life and Standard Deviation values that were derived as part of the previous regulatory price determination. Where the data was available, this was taken as the most accurate and accepted value. An exception to this was the SCADA, NETWORK CONTROL AND PROTECTION SYSTEMS category which was provided by the appropriate group.</p> <p>Where an Asset Category didn’t map to the consulting report, the accounting lives taken from a financial workbook was used to determine the Mean Life of the asset. Similarly for PUBLIC LIGHTING, the Public Lighting Model (RAB) was used as a secondary source to the consulting report.</p> <p>In the absence of a Standard Deviation figure provided in the consulting report, an engineering rule of thumb was applied, being the square root of the mean life, to obtain the Standard Deviation. This ensures there was a consistent approach applied where there was an absence of information. To achieve the above, the following was undertaken:</p> <p><u>PB 2010 Consulting Report</u></p> <ul style="list-style-type: none"> • Where applicable, a one to one mapping of asset categories based on the description was undertaken between the consulting report and 2014 Category Analysis RIN. • Where multiple categories in 2014 Category Analysis RIN matched up to a single description in the consulting report, the mean life and stand deviation (where available) where manually mapped. • Cell linking could not be achieved due to the formatting of the consulting report and therefor was manually entered into the final output sheet “CP 5.2 Comparison FINAL”. <p><u>Accounting Lives – Financial Workbook</u></p> <ul style="list-style-type: none"> • Where applicable, a one to one mapping of asset categories based on the description was undertaken between the Accounting Lives and 2014 Category Analysis RIN. • Cell linking could be achieved and was mapped to the final output sheet “CP 5.2 Comparison FINAL”. <p><u>Public Lighting Model (RAB)</u></p> <ul style="list-style-type: none"> • The public lighting model was used to provide a mean life for “Luminaries” of 20 years as this could not be obtained via the PB 2010 consulting report or the Account Life – Financial Workbook. <p>The final comparison sheet, “CP 5.2 Comparison FINAL”, is a comparison between the PB2010 consulting report values and the Accounting Lives as a result of the category mapping. Column D (Mean Life) and Column E (Standard Deviation) contains a formula which selects the required value based on whether a value exists from the PB2010 consulting report. If a value didn’t exist from the PB2010 consulting report, then the accounting life was selected along with the standard deviation calculated by the square root calculation.</p>

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why an estimate was required, including why it is not possible to use actual data;
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	A complete data-set of actual historical ‘age on replacement’ information is not available as the asset management systems and processes are not designed to capture all this information. This ‘age on

	replacement is the essential actual data required to prepare actual mean and standard deviation of each asset sub-category.
--	---

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	The basis of the estimate is to largely rely on the work undertaken by consultants in 2010, when they previously estimated this information using a small amount of actual data available at the time. Where there was no information available from the consultant's report, the mean life of some asset sub-categories was taken as the accounting life.

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	As per 2013
2010	As per 2013
2011	As per 2013
2012	As per 2013
2013	This was the only option available.

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Data for the years 2009-2012 is not applicable to this Information Notice, as the request was for a single asset age profile.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

5.3 MD – Network Level

AER CATEGORY ANALYSIS RIN

Tab name: 5.3 Maximum demand at network level	
Table name: 5.3.1 – Raw and Weather Corrected Coincident MD at Network Level	
(All Categories)	(All Categories)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Network coincident maximum demand

The load on the network at the time during which the network was experiencing its maximum demand for the relevant regulatory year.

CitiPower must provide inputs for the appropriate cells if it has calculated historical and forecast weather corrected maximum demand.

(a) CitiPower must describe its weather correction process in the basis of preparation. CitiPower must describe whether the weather corrected maximum demand figures provided are based on raw adjusted maximum demand or raw unadjusted maximum demand or another type of maximum demand figure.

(b) Where CitiPower does not calculate weather corrected maximum demand it may estimate the historical weather corrected data or shade the cells black. For the Regulatory Years including and after 2015 CitiPower must provide weather corrected maximum demand in accordance with best regulatory practice weather correction methodologies.

Please provide a Response in this box:

The information provided in tables 5.3.1 is a summation of the raw unadjusted *maximum demand* measured at the transmission connection point demand measured at the time of peak demand of the whole CitiPower network (coincident). The measured *maximum demand* complies with the definition in chapter 10 of the National Electricity Rules, version 60. CitiPower does not weather correct the maximum demand at a Network level as this serves no useful purpose for system augmentation planning and capex forecasting for the business, hence these cells have been shaded black

Information provided is consistent with the requirements of the Category Analysis RIN Notice

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁷⁹ data green**; and **ESTIMATED⁸⁰/derived data red**

⁷⁹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁸⁰ “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

2009	2010	2011	2012	2013
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C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

Data originates from the wholesale metering database utilising tool IEE Report Runner. All terminal station supply point data is summated to provide the Citipower network MD.

Embedded generation data mainly consists of gas generation and is all non-scheduled generation.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	A template in IEE Report Runner summates all the terminal station connection point data by summating the data for the all metering NMI's exit all terminal stations. From this a monthly summary spreadsheet is created which obtains the Network Coincident MD and the date and time this MD occurred. The month with the highest MD for the year is used to report the 'Raw Network Coincident MD', 'Date MD occurred', 'Half Hour Time period MD Occurred', 'Summer/Winter Peaking'. Another template captures all the <u>exported</u> 'Embedded Generation' into the network at that date & time. Citipower did not start recording and reporting the exported embedded generation until 2012 hence the cell has been shaded black. Citipower does not weather correct the maximum demand at a Network level as this serves no useful purpose for system augmentation planning and capex forecasting for the business, hence these cells have been shaded black
2010	As per 2009
2011	As per 2009
2012	As per 2009 but with exported embedded generation cell filled in
2013	As per 2012

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	The raw data provided is all actual data
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	Not Applicable
2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	Not Applicable

2010	Not Applicable
2011	Not Applicable
2012	Not Applicable
2013	Not Applicable

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Weather corrected loads not provided as Citipower does not weather correct loads at a network level as this serves no useful purpose for the business with regard to system augmentation planning and capex forecasting.

Citipower did not start recording and reporting the export embedded generation data until 2012 so no data provided for embedded generation for years 2009, 2010 and 2011.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

5.4 MD & utilisation – Spatial

AER CATEGORY ANALYSIS RIN

Tab name: 5.4 Maximum demand and utilisation - spatial	
Table name: 5.4.1 Non-Coincident & Coincident Maximum Demand	
Network Level	Forecasting Elements
Zone Substation	(ALL)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

Copy and paste the Requirements of the Notice in this box:

Coincident maximum demand - The load on the specified network segment at the time during which the network was experiencing its maximum demand for the relevant regulatory year.

Non-coincident maximum demand - The load on the specified network segment, at the time during which the relevant network segment was experiencing its maximum demand for the relevant regulatory year. This is irrespective of whether the network was also experiencing maximum demand.

Please provide a Response in this box:

The information provided in table 5.4.1 is consistent with the requirements of the CA RIN notice.

The non coincident maximum demand are the measured seasonal maximum demand per zone substation (summer or winter) and the coincident demand are the measured demand per zone substation at the time of the whole CitiPower Network maximum demand.

The measured maximum demand complies with the definition in chapter 10 of the National Electricity Rules, version 60. Information provided is consistent with the requirements of the Category Analysis RIN Notice

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁸¹ data green**; and **ESTIMATED⁸²/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

⁸¹ “Actual Information” is defined as: “Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

‘Accounting records’ include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower regulatory accounts and responses to the Notice. ‘Records used in the normal course of business’, for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on.”

⁸² “Estimated Information” is defined as “Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower’s historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.”

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:			
FORECASTING ELEMENTS	UNIT	MAX DEMAND	Source
SUBSTATION RATING	MVA	NON-COINCIDENT	TRANSP software.
		COINCIDENT	TRANSP software.
RAW ADJUSTED MD	MW	NON-COINCIDENT	TrendSCADA software
		COINCIDENT	TrendSCADA software
RAW ADJUSTED MD	MVA	NON-COINCIDENT	Calculated based on TrendSCADA MW
		COINCIDENT	Same as Raw Adjusted MD COINCIDENT MW
DATE MD OCCURRED HALF HOUR TIME PERIOD MD OCCURRED		NON-COINCIDENT	TrendSCADA software
		COINCIDENT	29/01/2009 at 13:45 20/11/2009 at 13:45 01/02/2011 at 14:30 29/11/2012 at 16:30 12/03/2013 at 16:45
WINTER/SUMMER PEAKING		NON-COINCIDENT	Determined by MD date
		COINCIDENT	Determined by MD date
ADJUSTMENTS - EMBEDDED GENERATION	MW	NON-COINCIDENT	TrendSCADA/ IEE Report Runner Software
		COINCIDENT	TrendSCADA/ IEE Report Runner Software
WEATHER CORRECTED MD 10% POE	MW	NON-COINCIDENT	Calculated
		COINCIDENT	Weather corrected loads not provided for coincident loads as Citipower does not weather correct coincident loads.
WEATHER CORRECTED MD 10% POE	MVA	NON-COINCIDENT	Same as non-coincident 10% POE MW
		COINCIDENT	Weather corrected loads not provided for coincident loads as Citipower does not weather correct coincident loads
WEATHER CORRECTED MD 50% POE	MW	NON-COINCIDENT	Calculated
		COINCIDENT	Weather corrected loads not provided for coincident loads as Citipower does not weather correct coincident loads.
WEATHER CORRECTED MD 50% POE	MVA	NON-COINCIDENT	Same as non-coincident 50% POE MW
		COINCIDENT	Weather corrected loads not provided for coincident loads as Citipower does not weather correct coincident loads.

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions												
2009	<p>To get the non-coincident ZSS MD we download the data from TrendSCADA. Then we download the loop data for the ZSSs from MDS (which is more accurate compared to TrendSCADA). The data from TrendSCADA is then calibrated to the MDS data to reflect a more accurate ZSS MD.</p> <p>The weather corrected loads (where provided) are estimates using a Probability of Exceedance (POE) calculator in the CPMD spreadsheet. They have been labelled as estimates as they are calculated and not metered values. The raw ZSS MDs are temperature corrected to a 50% POE value using the average temperatures that occurred on the day of the MD.</p> <p>Citipower non-coincident ZSS Peak Demand 10% POE for 2009-2010 was calculated using the 10%/50% POE ratio from the PAL and CP TS MD Summation 2006-2010 data provided by NIER.</p> <p>The 10/50 % ratios from NIEIR were used to estimate for 2009 – 2010 the 10% POE MDs (see below). The 10/50 % ratios for 2011-2013 were calculated. The ratio was calculated using the following formula: 50% POE System total Max Demand / 10% POE System total Max Demand.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th></th> <th>2008-09</th> <th>2009-10</th> <th>2010-11</th> <th>2011-12</th> <th>2012-13</th> </tr> </thead> <tbody> <tr> <td>10%/50% POE ratio</td> <td>1.060</td> <td>1.064</td> <td>1.068</td> <td>1.068</td> <td>1.087</td> </tr> </tbody> </table> <p>2009-2012: The non coincident MVA actuals are unavailable, so reported values are based on historical PF (powerfactor) at each zone substation. The MVA is calculated using the actual MW and the calculated station MVA_r output using historical tan phi and taking into consideration of possible capacitor bank compensation. The tan phi used in calculation is the worst possible tan phi historical record during the station peak loading periods, which is not the actual coincident tan phi at the same time of MW MD</p> <p>2013: CitiPower load forecasting spreadsheet for 2013 shows the actual MW & actual transformer summation MVA_rs, while the MVA is calculated using the actual MW and the actual transformer summation MVA_rs.</p>		2008-09	2009-10	2010-11	2011-12	2012-13	10%/50% POE ratio	1.060	1.064	1.068	1.068	1.087
	2008-09	2009-10	2010-11	2011-12	2012-13								
10%/50% POE ratio	1.060	1.064	1.068	1.068	1.087								
2010	As above												
2011	As above												
2012	As above												
2013	As above												

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	As per Methodology & Assumptions
2010	Same as above
2011	Same as above
2012	Same as above
2013	Same as above

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	As per Methodology & Assumptions
2010	Same as above
2011	Same as above
2012	Same as above
2013	Same as above

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
------	---

2009	As per Methodology & Assumptions
2010	Same as above
2011	Same as above
2012	Same as above
2013	Same as above

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Weather corrected loads not provided for coincident loads as Citipower does not weather correct coincident loads.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
------	------	------	------	------

Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a

6.3 Sustained interruptions

AER CATEGORY ANALYSIS RIN

Tab name: 6.3 Sustained Interruptions	
Table name: 6.3.1 - Sustained interruptions to supply	
Reason for interruption	Detailed reason for interruption
(All Categories)	(All Categories)

A. Demonstrate how the information provided is consistent with the requirements of the Category Analysis RIN Notice (CA RIN) (refer AER Category Analysis RIN Schedule 2 Section 1.2(a))

Please note that you will need to copy and paste the requirements from the CA RIN itself. The requirements can be found in “Appendix E: Principles and Requirements”, and “Appendix F: Definitions”. **Only copy the requirements specific to the variables covered by this Basis of Preparation document.** The AER CA RIN Explanatory Statement can also provide additional detail as to why the AER requires this information.

The intent of this section is for you to demonstrate and confirm, that the data provided complies with the instructions and definitions specified in the CA RIN.

18. SUSTAINED INTERRUPTIONS TO SUPPLY

18.1 Regulatory Template 6.3 requires the input of both planned and unplanned interruptions to supply.

18.2 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 more than 0.5 seconds, including outages affecting a single premises. The customer interruption starts when recorded by equipment such as SCADA 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. Does not include subsequent interruptions caused by network switching during fault finding. An interruption ends when supply is again generally available to the customer.

18.3 An unplanned event is an event that causes an interruption where the customer has not been given the required notice of the interruption or where the customer has not requested the outage.

18.4 An unplanned interruption is an interruption due to an unplanned event.

(a) The following events may be excluded when calculating the revenue increment or decrement under the service target performance incentive scheme (STPIS) when an interruption on the DNSP’s distribution network has not already occurred or is concurrently occurring at the same time:

- (1) load shedding due to a generation shortfall*
- (2) automatic load shedding due to the operation of under frequency relays following the occurrence of a power system under-frequency condition*
- (3) load shedding at the direction of the Australian Energy Market Operator (AEMO) or a system operator*
- (4) load interruptions caused by a failure of the shared transmission network*
- (5) 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*
- (6) 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.*

(b) An event may also be excluded where daily unplanned SAIDI for the DNSP’s distribution network exceeds the major event day boundary, as set out in appendix D of the STPIS, when the event has not been excluded under clause 3.3(a).

18.5 In completing table 6.3.1, CitiPower must select a reason from the list provided for in column G. For Initial Regulatory Years, and the 2014 Regulatory Year, CitiPower may, but is not required to, select a detailed reason from the list provided for in column G (marked with orange cells). For the 2015 Regulatory Year and thereafter, CitiPower must select a detailed reason for each interruption.

Please provide a Response in this box:

The data provided is consistent with the source data used for reliability performance reporting over the past five years in the ESC/AER Annual RIN Reports.

As per the AER's issue register issued 7 March 2014, the reference to 0.5 seconds applies to interruptions not sustained interruptions. As a result, DNSPs should refer to references in template 6.3 which correctly refer to sustained interruptions being greater than 1 minute.

This methodology meets the requirements of this Information Notice to the best of our abilities.

B. Actual vs. Estimated Data colour coding

For each year, please shade **ACTUAL⁸³ data green**; and **ESTIMATED⁸⁴/derived data red**

2009	2010	2011	2012	2013
------	------	------	------	------

C. Source (refer AER Category Analysis RIN Schedule 2 Section 1.2(b))

Please explain the source from where the data has been obtained for each year (i.e. GIS, SAP, OAS, Audited financial statements etc.). If the data has not been obtained from the *originating source* (e.g. it was sourced from a report such as the Annual Regulatory Performance Report etc.), the originating source for data in the performance report/RIN will need to be provided as well.

Response:

For CitiPower (CP), the originating data sources are:

- CitiPower OMS (Outage Management System) 2009-2013
- ESC/AER Annual Reports 2009-2013
- AER STPIS Exclusion Determinations 2009-2013

D. Methodology & Assumptions (refer AER Category Analysis RIN Schedule 2 Section 1.2(c))

Please explain for each year, the methodology applied including any assumptions made to determine the final value populated in the RIN. Where applicable please reference the relevant processes and procedures used. If the same explanation applies over other years, just refer to the applicable year.

Year	Methodology & Assumptions
2009	<p>Outage data was obtained directly from OMS for all Unplanned and Planned Sustained Interruptions.</p> <ul style="list-style-type: none">• This information provided the following data per outage - Date, Start Time, Feeder, Feeder Classification, Cause, Sub-Cause, Number of Customers Affected, Ave Cust Int Duration and Customer Minutes off Supply. <p>Total Customer numbers were obtained from OMS.</p> <ul style="list-style-type: none">• These were used to calculate SAIDI and SAIFI at Category Level.

⁸³ "Actual Information" is defined as: "Information presented in response to the Notice whose presentation is Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is not contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice.

'Accounting records' include trial balances, the general ledger, subsidiary accounting ledgers, journal entries and documentation to support journal entries. Actual financial information may include accounting estimates, such as accruals and provisions, and any adjustments made to the accounting records to populate CitiPower's regulatory accounts and responses to the Notice. 'Records used in the normal course of business', for the purposes of non-financial information, includes asset registers, geographical information systems, outage analysis systems, and so on."

⁸⁴ "Estimated Information" is defined as "Information presented in response to the Notice whose presentation is not Materially dependent on information recorded in CitiPower's historical accounting records or other records used in the normal course of business, and whose presentation for the purposes of the Notice is contingent on judgments and assumptions for which there are valid alternatives, which could lead to a Materially different presentation in the response to the Notice."

	<p>The current STPIS scheme exclusions and MED Threshold determination criteria was applied to the 2009-2013 data to identify applicable outages.</p> <p>The AER 'Reason for Interruption' and 'Detailed Reason for Interruption' were matched to the applicable CitiPower OMS Cause and Sub-cause Codes.</p> <ul style="list-style-type: none"> Where corresponding data was not available to match the AER 'Reason for Interruption' and 'Detailed Reason for Interruption', the field was left blank.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

E. Estimated or Derived Data (refer AER Category Analysis RIN Schedule 2 Section 1.2(d))

For those years where data has been estimated or derived from other data, please explain: (If the same explanation applies over other years, just refer to the applicable year.)

Year	1. why is an estimate was required, including why it is not possible to use actual data;
2009	The outage information contained in the CitiPower OMS system as Cause/Sub-Cause does not fully match the 'Reasons for Interruptions' as requested by this Information Notice.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	2. the basis for the estimate, including the approach used, options considered and assumptions made; and
2009	<p>In the case of 'Reason for Interruption' and 'Detailed Reason for Interruption', the reasons as supplied by the AER were matched to the equivalent CitiPower OMS Cause and Sub-Cause combination where possible.</p> <ul style="list-style-type: none"> To enable CitiPower to populate the fields, OMS Cause/Sub-Cause for each case was matched to the equivalent AER Reason/Detailed Reason for Interruption where possible. Where matching data was not available in the CitiPower OMS system the field was left blank.
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

Year	3. the reason(s) for the selected approach and why it is the best estimate, given the information sought in the Notice.
2009	<p>The approach utilised existing data which is consistent with the source data used for reliability performance reporting over the past five years in the ESC/AER Annual RIN Reports.</p> <p>This Information Notice allows DNSP's to <u>not</u> provide 'Detailed Reason for Interruption' for cases in the years 2009-2013, if information is not available.</p>
2010	As per 2009
2011	As per 2009
2012	As per 2009
2013	As per 2009

F. No data provided

For data that is not being provided (actual, estimated, derived) please provide the reason/s as to why it cannot be provided.

Response:

Where an equivalent to a 'Detailed Reason for Interruption' was not available in existing Cause/Sub-Cause data within the CitiPower OMS system, the required field was left blank.

G. Data Quality colour coding

Please colour each year as per the ENA data quality colour coding scheme, to provide an indication of the quality of the data provided.

2009	2010	2011	2012	2013
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Colour Code	Availability of data	Amount of notional allocations/estimation techniques
Green	Available and verifiable	Minimal or None
Yellow	Available but with some gaps	Simple
Orange	Little or no data available	Complex
Red	Little or no data available	Impossible
Black	Not applicable (n/a)	n/a