

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
1	Provide information				
1.1	Provide the information required in each regulatory template in the Microsoft Excel Workbook 1 - Regulatory determination , Workbook 2 - New CY historical and Workbook 07 - indicative Bill impact , completed in accordance with:				
1.1 (a)	this notice;		CP RIN 001 - Workbook 1 - Forecast templates - Jan2020 - Public CP RIN 002 - Workbook 2 - New CY historical - Jan2020 - Public CP RIN 007 - Workbook 07 - Indicative Bill impact - Jan2020 - Public		
1.1 (b)	the instructions in the relevant Microsoft Excel Workbook attached at Appendix A;		CP RIN 001 - Workbook 1 - Forecast templates - Jan2020 - Public CP RIN 002 - Workbook 2 - New CY historical - Jan2020 - Public CP RIN 007 - Workbook 07 - Indicative Bill impact - Jan2020 - Public		
1.1 (c)	the instructions in Appendix E;		CP RIN 001 - Workbook 1 - Forecast templates - Jan2020 - Public CP RIN 002 - Workbook 2 - New CY historical - Jan2020 - Public CP RIN 007 - Workbook 07 - Indicative Bill impact - Jan2020 - Public		
1.1 (d)	the service classifications set out in the framework and approach paper for the forthcoming regulatory control period; and		CP RIN 001 - Workbook 1 - Forecast templates - Jan2020 - Public CP RIN 002 - Workbook 2 - New CY historical - Jan2020 - Public CP RIN 007 - Workbook 07 - Indicative Bill impact - Jan2020 - Public		
1.1 (e)	CitiPower’s cost allocation method for the forthcoming regulatory control period		CP RIN 001 - Workbook 1 - Forecast templates - Jan2020 - Public CP RIN 002 - Workbook 2 - New CY historical - Jan2020 - Public CP RIN 007 - Workbook 07 - Indicative Bill impact - Jan2020 - Public		
1.2	Provide the information required in each regulatory template in the Microsoft Excel Workbook 8 – Historical FY category analysis, Workbook 9 – Historical FY annual reporting and Workbook 10 – Historical FY economic benchmarking, completed in accordance with				
1.2(a)	this notice;		CP RIN008 - Workbook 8 – Historical FY CAT - Jan2020 - Public CP RIN009 - Workbook 9 – Historical FY Annual - Jan2020 - Public CP RIN010 - Workbook 10 – Historical FY EB - Jan2020 - Public		
1.2(b)	the instructions in the relevant Microsoft Excel Workbook attached at Appendix A;		CP RIN008 - Workbook 8 – Historical FY CAT - Jan2020 - Public CP RIN009 - Workbook 9 – Historical FY Annual - Jan2020 - Public CP RIN010 - Workbook 10 – Historical FY EB - Jan2020 - Public		

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
1.2(c)	the instructions in Appendix E; and		CP RIN008 - Workbook 8 – Historical FY CAT - Jan2020 - Public CP RIN009 - Workbook 9 – Historical FY Annual - Jan2020 - Public CP RIN010 - Workbook 10 – Historical FY EB - Jan2020 - Public		
1.2(d)	the definitions which applied when the data was previously provided to the AER.		CP RIN008 - Workbook 8 – Historical FY CAT - Jan2020 - Public CP RIN009 - Workbook 9 – Historical FY Annual - Jan2020 - Public CP RIN010 - Workbook 10 – Historical FY EB - Jan2020 - Public		
1.3	Provide the information required in each <i>regulatory template</i> in the Microsoft Excel Workbook 5 - EBSS, and Workbook 6 - CESS, completed in accordance with:				
1.3(a)	this <i>notice</i> ;		CP RIN005 - Workbook 5 - EBSS - Jan2020 - Public CP RIN006 - Workbook 6 - CESS - Jan2020 - Public		
1.3(b)	the instructions in the relevant Microsoft Excel Workbook attached at Appendix A;		CP RIN005 - Workbook 5 - EBSS - Jan2020 - Public CP RIN006 - Workbook 6 - CESS - Jan2020 - Public		
1.3(c)	the instructions in Appendix E;		CP RIN005 - Workbook 5 - EBSS - Jan2020 - Public CP RIN006 - Workbook 6 - CESS - Jan2020 - Public		
1.3 (d)	the service classifications that applied in each <i>regulatory year</i> ; and		CP RIN005 - Workbook 5 - EBSS - Jan2020 - Public CP RIN006 - Workbook 6 - CESS - Jan2020 - Public		
1.3(e)	CitiPower's cost allocation method that applied in each regulatory year		CP RIN005 - Workbook 5 - EBSS - Jan2020 - Public CP RIN006 - Workbook 6 - CESS - Jan2020 - Public		
1.4	if:				
1.4 (a)	CitiPower's cost allocation method has changed during the current regulatory control period, or		CP RIN003 - Workbook 3 – Recast CAT - Jan2020 - Public CP RIN004 - Workbook 4 – Recast EB - Jan2020 - Public		
1.4 (b)	CitiPower's service classifications have changed from the current regulatory control period, or		CP RIN003 - Workbook 3 – Recast CAT - Jan2020 - Public CP RIN004 - Workbook 4 – Recast EB - Jan2020 - Public		
1.4 (c)	<i>CitiPower's proposes to divert from the service classifications set out in the relevant framework and approach paper, or</i>		CP RIN003 - Workbook 3 – Recast CAT - Jan2020 - Public CP RIN004 - Workbook 4 – Recast EB - Jan2020 - Public		
1.4 (d)	<i>CitiPower proposes to change its cost allocation method for the forthcoming regulatory control period; such that there would be material changes to information previously submitted to the AER, CitiPower must revise any historical information previously submitted to the AER under either the annual Category Analysis or the Economic Benchmarking RIN</i>		CP RIN003 - Workbook 3 – Recast CAT - Jan2020 - Public CP RIN004 - Workbook 4 – Recast EB - Jan2020 - Public	CP ATT027 - Cost Allocation Method - Jan2020 - Public	
1.5	CitiPower must report information revised in accordance with paragraph 1.2 (Revised Information) in the following manner:				
1.5 (a)	<i>Use Workbook 3 – Recast category analysis and Workbook 4 – Recast economic benchmarking attached at Appendix A to submit the information to the AER</i>		CP RIN003 - Workbook 3 – Recast CAT - Jan2020 - Public CP RIN004 - Workbook 4 – Recast EB - Jan2020 - Public		

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
1.5 (b)	Report all Revised Information in the relevant table in the regulatory templates		CP RIN003 - Workbook 3 – Recast CAT - Jan2020 - Public CP RIN004 - Workbook 4 – Recast EB - Jan2020 - Public		
1.5 (c)	Where Revised Information in one table causes a change to information in another table, regardless of whether that other change is a material change, report that change in the relevant table		CP RIN003 - Workbook 3 – Recast CAT - Jan2020 - Public CP RIN004 - Workbook 4 – Recast EB - Jan2020 - Public		
1.5 (d)	When reporting any change in any table in a regulatory template, include within that table all information that remains unchanged from that previously reported to the AER		CP RIN003 - Workbook 3 – Recast CAT - Jan2020 - Public CP RIN004 - Workbook 4 – Recast EB - Jan2020 - Public		
1.6	For all information, other than forecast information, provide in accordance with this notice and the instructions in Appendix E, a basis of preparation demonstrating how CitiPower has complied with this notice in respect of:				
1.6 (a)	the information in each <i>regulatory template</i> in the Microsoft Excel Workbooks attached at Appendix A; and			CP RIN014 - Basis of preparation - Jan2020 - Public	
1.6 (b)	the information prepared in accordance with the following requirements in Schedule 1 of this <i>notice</i> :			CP RIN014 - Basis of preparation - Jan2020 - Public	
(i)	paragraph 5.1(a)(ii);			CP RIN014 - Basis of preparation - Jan2020 - Public	
(ii)	paragraph 5.1(b);			CP RIN014 - Basis of preparation - Jan2020 - Public	
(iii)	paragraph 7.5;			CP RIN014 - Basis of preparation - Jan2020 - Public	
(iv)	paragraph 12 (12.4, 12.5, 12.6 and 12.7);			CP RIN014 - Basis of preparation - Jan2020 - Public	
(v)	paragraph 13.2;			CP RIN014 - Basis of preparation - Jan2020 - Public	
(vi)	paragraph 14;			CP RIN014 - Basis of preparation - Jan2020 - Public	
(vii)	paragraph 15;			CP RIN014 - Basis of preparation - Jan2020 - Public	
(viii)	paragraph 24 (24.1, 24.2, 24.4);			CP RIN014 - Basis of preparation - Jan2020 - Public	
(i)	paragraph 25 (25.1(a) and 25.2); and			CP RIN014 - Basis of preparation - Jan2020 - Public	
(x)	paragraph 26 (26.5, 26.6 and 26.8).			CP RIN014 - Basis of preparation - Jan2020 - Public	
1.7	Provide material used for the purposes of preparing the regulatory proposal :				
1.7 (a)	all consultants' reports commissioned and relied upon in whole or in part;	CitiPower - Regulatory Proposal - A1 Attachments list			
1.7 (b)	all <i>material</i> assumptions relied upon;			CP ATT137 - Certification of key assumptions - Jan2020 - Public	
1.7 (c)	a table that references each response to a paragraph in this Schedule 1 and where it is provided in or as part of the <i>regulatory proposal</i> ;			CP RIN015 - RIN schedule 1 matrix - Jan2020 - Public	
1.7 (d)	a table that references each document provided in or as part of the <i>regulatory proposal</i> and its relationship to other documents provided; and	CitiPower - Regulatory Proposal - A1 Attachments list			
1.7 (e)	each document identified in paragraph 1.5 (d) must be given a meaningful filename in the form:				Noted
	CitiPower - [Author] - [title] - [date] - [public/confidential], where:				Noted
(i)	Author is the author of the file if not CitiPower for example a consultant or other third party;				Noted
(ii)	Title provides a meaningful description of the content of document, with limited reliance on acronyms or cross references, for example "Appendix 1A" is not meaningful, but "Appendix 1A - Cost allocation method" is;				Noted
(iii)	Date is a relevant date associated with the file, generally the date the document was created;				Noted

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(iv)	Public/confidential identifies if the file in its entirety can be published (public); or if it contains any information which is the subject of a claim for confidentiality in accordance with paragraph 34 of this notice (confidential).				Noted
1.8	Provide for each material assumption identified in the response to paragraph 1.5 (b):				
1.8 (a)	its source or basis;			CP ATT 137 - Certification of key assumptions - Jan2020 - Public	
1.8 (b)	if applicable, its quantum;			CP ATT 137 - Certification of key assumptions - Jan2020 - Public	
1.8 (c)	whether and how the assumption has been applied and was taken into account; and			CP ATT 137 - Certification of key assumptions - Jan2020 - Public	
1.8 (d)	the effect or impact of the assumption on the capital and operating expenditure forecasts in the <i>forthcoming regulatory control period</i> taking into account: and			CP ATT 137 - Certification of key assumptions - Jan2020 - Public	
(i)	the actual expenditure incurred during the current <i>regulatory control period</i> ; and			CP ATT 137 - Certification of key assumptions - Jan2020 - Public	
(ii)	the sensitivity of the forecast expenditure to the assumption			CP ATT 137 - Certification of key assumptions - Jan2020 - Public	
1.9	Provide reconciliation of the capital and operating expenditure forecasts provided in the regulatory templates to the proposed capital and operating allowances in the post-tax revenue model for the forthcoming regulatory control period		CP RIN01 - Reset RIN forecast templates - Jan2020 - Public	CP MOD 10.05 - Consolidated capex - Jan2020 - Public CP MOD 10.06 - Opex - Jan2020 - Public CP MOD 10.02 - PTRM 2021-26 - Jan2020 - Public	Capital expenditure for the forthcoming regulatory control period is sourced from the consolidated capex model. The model maps function/material code forecasts to the functional (reset RIN) and PTRM capital expenditure categories using a mapping table. It is also checks that the totals reconcile. Operating expenditure for the forthcoming regulatory control period is sourced from the consolidated opex model. The model builds up the operating expenditure forecast using the AER's standard base-step-trend approach. This model is used to populate both the reset RIN templates and the PTRM, and hence the values reconcile.
1.10	Where the regulatory proposal varies or departs from the application of any component or parameter of the capital efficiency sharing scheme, efficiency benefit sharing scheme, demand management incentive scheme or service target performance incentive scheme as set out in the framework and approach paper, for each variation or departure explain:				Our regulatory proposal does not vary or depart from the application of any component or parameter of the capital efficiency sharing scheme, efficiency benefit sharing scheme, service target performance incentive scheme or demand management incentive scheme as set out in the framework and approach paper.
1.10 (a)	the reasons for the variation or departure, including why it	CitiPower - Regulatory Proposal - Chapter 10 - Revenue			
1.10 (b)	how the variation or departure aligns with the objectives of the relevant scheme; and	CitiPower - Regulatory Proposal - Chapter 10 - Revenue			
1.10 (c)	how the proposed variation or departure will impact the operation of the relevant scheme	CitiPower - Regulatory Proposal - Chapter 10 - Revenue			
2	CLASSIFICATION OF SERVICES				
2.1	Identify each proposed service classification in the regulatory proposal which departs from a service classification set out in the framework and approach paper and explain				Our regulatory proposal does not depart from the service classification set out in the Framework and Approach paper
2.1 (a)	the reasons for the departure, including why the proposed service classification is more appropriate; and				Not applicable

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
2.1 (b)	how service will differ under the proposed service classification in comparison to that in the framework and approach paper				Not applicable
2.2	If the proposed service classifications in the regulatory proposal depart from any of the service classifications set out in the framework and approach paper				Not applicable
2.2 (a)	provide, in a second set of regulatory templates, all information required in each regulatory template in accordance with the instructions contained therein, modified as necessary, to incorporate the proposed service classifications; and				Not applicable
2.2 (b)	identify and explain where the regulatory templates differ				Not applicable
3	CONTROL MECHANISMS				
3.1	For the forecast revenues that CitiPower proposes to recover from providing direct control services over the forthcoming regulatory control period provide:				
3.1 (a)	formulaic expressions for the basis of control mechanisms for standard control services and for alternative control services; and			CP APP08 - Price control formula - Jan2020 - Public	
3.1 (b)	a detailed explanation and justification for each component that makes up the formulaic expression			CP APP08 - Price control formula - Jan2020 - Public	
3.2	Also demonstrate:				
3.2 (a)	how CitiPower considers the control mechanisms are compliant with the framework and approach paper; and			CP APP08 - Price control formula - Jan2020 - Public	F&A paper control mechanisms no longer relevant due to the six-month extension. Our proposed control mechanisms are consistent with preliminary AER views on how the control mechanisms will work.
3.2 (b)	for standard control services, how CitiPower considers the control mechanisms are also compliant with clause 6.2.6 and Part C of Chapter 6 of the NER	CitiPower - Regulatory proposal - Chapter 10 - Revenue			Our proposed control mechanisms are compliant with clause 6.2.6 and Part C of the National Electricity Rules
Expenditure Reporting					
4	Capital Expenditure				
General					
4.1	Provide justification for CitiPower's total forecast capex, including the following information				
4.1 (a)	why the total forecast capex is required for CitiPower to achieve each of the objectives in clause 6.5.7(a) of the NER;			CP RIN013 - Expenditure factors and criteria - Jan2020 - Public	
4.1 (b)	how CitiPower's total forecast capex reasonably reflects each of the criteria in clause 6.5.7(c) of the NER;			CP RIN013 - Expenditure factors and criteria - Jan2020 - Public	
4.1 (c)	how CitiPower's total forecast capex accounts for the factors in clause 6.5.7(e) of the NER;			CP RIN013 - Expenditure factors and criteria - Jan2020 - Public	
4.1 (d)	an explanation of how the plans, policies, procedures and regulatory obligations or requirements identified in Workbook 1 – Regulatory determination, regulatory templates 7.1 and 7.3 have been used to develop forecast capex; and			CP RIN013 - Expenditure factors and criteria - Jan2020 - Public	

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
4.1 (e)	an explanation of how each response provided to paragraph 4.1 (a) to (d) is reflected in any increase or decrease in expenditures or volumes, particularly between the current and forthcoming regulatory control periods, provided in Workbook 1 – Regulatory determination, regulatory templates 2.1 to 2.11			CP RIN013 - Expenditure factors and criteria - Jan2020 - Public	
4.2	Provide the model(s) and methodology CitiPower used to develop its total forecast capex, including:				
4.2 (a)	A description of how CitiPower prepared the forecast capex, including:				
(i)	how its preparation differed or related to budgetary, planning and governance processes used in the normal operation of CitiPower’s business				The preparation of our capital expenditure forecast is consistent with the budgetary, planning and governance processes used in the operation of our business.
(ii)	the processes for ensuring amounts are free of error and other quality assurance steps; and				Rigorous checks were made to the forecasts, including reviews by subject matter experts, senior managers and the executive management, as well as other quality assurance steps to ensure the amounts are free from error.
(iii)	if and how CitiPower considered the resulting amounts, when translated into price impacts, were in the long term interest of consumers				The forecasts are consistent with the requirements for prudence and efficiency of capital expenditure, and thus when the resulting amounts are translated into the estimated impact on the future electricity bill of customers, any price increases are minimised to ensure the expenditure is in the long term interests of customers.
4.2 (b)	any source material used (including models, documentation or any other items containing quantitative data); and	CitiPower - Regulatory Proposal - A1 Attachments list			We have included all source material in the attachments list which forms part of our regulatory proposal
4.2 (c)	calculations that demonstrate how data from the source material has been manipulated or transformed to generate data provided in the regulatory templates in Workbook 1 – Regulatory determination	CitiPower - Regulatory proposal - chapters 4 - 10 CitiPower - Regulatory proposal - A1 Attachments list			How source material has been used is detailed in individual business cases supporting our regulatory proposals or in the chapters themselves of the regulatory proposals in the section 'Our forecasting approach'.
4.3	Identify which items of CitiPower’s forecast capex are:				
4.3 (a)	derived directly from competitive tender processes;	CitiPower - Regulatory proposal - capital expenditure chapters 4 - 8			How cost estimates have been derived for capital expenditure is set out in the 'Our forecasting approach' in the final section of each of the capital expenditure chapters 4 to 8
4.3 (b)	based upon competitive tender processes for similar projects;	CitiPower - Regulatory proposal - capital expenditure chapters 4 - 8			How cost estimates have been derived for capital expenditure is set out in the 'Our forecasting approach' in the final section of each of the capital expenditure chapters 4 to 8
4.3 (c)	based upon estimates obtained from contractors or manufacturers;	CitiPower - Regulatory proposal - capital expenditure chapters 4 - 8			How cost estimates have been derived for capital expenditure is set out in the 'Our forecasting approach' in the final section of each of the capital expenditure chapters 4 to 8
4.3 (d)	based upon independent benchmarks;	CitiPower - Regulatory proposal - capital expenditure chapters 4 - 8			How cost estimates have been derived for capital expenditure is set out in the 'Our forecasting approach' in the final section of each of the capital expenditure chapters 4 to 8
4.3 (e)	based upon actual historical costs for similar projects; and	CitiPower - Regulatory proposal - capital expenditure chapters 4 - 8			How cost estimates have been derived for capital expenditure is set out in the 'Our forecasting approach' in the final section of each of the capital expenditure chapters 4 to 8

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
4.3 (f)	reflective of any amounts for risk, uncertainty or other unspecified contingency factors, and if so, how these amounts were calculated and deemed reasonable and prudent	CitiPower - Regulatory proposal - capital expenditure chapters 4 - 8			How cost estimates have been derived for capital expenditure is set out in the 'Our forecasting approach' in the final section of each of the capital expenditure chapters 4 to 8
4.4	Provide all documents which were materially relied upon and relate to the deliverability of forecast capex and explain the proposed deliverability	CitiPower - Regulatory proposal - capital expenditure chapters 4 - 8		CP ATT007 - IT deliverability plan - Jan2020 - Public	Deliverability is discussed in the capital expenditure chapters 4 - 8 of the regulatory proposal. IT deliverability plan is provided as an attachment.
Capex categories					
4.5	Describe each capex category and expenditures comprising these categories identified in the regulatory templates, including:				
4.5 (a)	key drivers for expenditure;			CP RIN013 - Expenditure factors and criteria - Jan2020 - Public	
4.5 (b)	an explanation of how expenditure is distinguished between:			CP RIN013 - Expenditure factors and criteria - Jan2020 - Public	
(i)	greenfield driven and reinforcement driven augmentation capex;			CP RIN013 - Expenditure factors and criteria - Jan2020 - Public	
(ii)	connections expenditure and augmentation capex;			CP RIN013 - Expenditure factors and criteria - Jan2020 - Public	
(iii)	replacement capex driven by condition and asset replacements driven by other drivers (e.g. the need for greenfield or reinforcement driven augmentation capex); and			CP RIN013 - Expenditure factors and criteria - Jan2020 - Public	
(iv)	any other capex category or opex category where CitiPower considers that there is reasonable scope for ambiguity in categorisation			CP RIN013 - Expenditure factors and criteria - Jan2020 - Public	
5	REPLACEMENT CAPITAL EXPENDITURE MODELLING				
5.1	In relation to information provided in Workbook 1 – Regulatory determination, regulatory template 2.2 and with respect to the AER’s repex model, provide:				
5.1 (a)	For individual asset categories in each asset group set out in the regulatory templates, provide in a separate document:				
(i)	a description of the asset category, including:			CP RIN016 - Repex RIN response - Jan2020 - Public	
(i) (A)	the assets included and any boundary issues (i.e. with other asset categories);			CP RIN016 - Repex RIN response - Jan2020 - Public	
(i) (B)	an explanation of how these matters have been accounted for in determining quantities in the age profile;			CP RIN016 - Repex RIN response - Jan2020 - Public	
(i) (C)	an explanation of the main drivers for replacement (e.g. condition); and			CP RIN016 - Repex RIN response - Jan2020 - Public	
(i) (D)	an explanation of whether the replacement unit cost provides for a complete replacement of the asset, or some other activity, including an extension of the asset’s life (e.g. pole staking) and whether the costs of this extension or other activity are capitalised or not			CP RIN016 - Repex RIN response - Jan2020 - Public	
(ii)	an estimate of the proportion of assets replaced for each year of the current regulatory control period, due to:			CP RIN016 - Repex RIN response - Jan2020 - Public	
(ii) (A)	aging of existing assets (e.g. condition, obsolesce, etc.) that should be largely captured by this form of replacement modelling			CP RIN016 - Repex RIN response - Jan2020 - Public	
(ii) (B)	replacements due to other factors (and a description of those factors)			CP RIN016 - Repex RIN response - Jan2020 - Public	
(ii) (C)	additional assets due to the augmentation, extension, development of the network; and			CP RIN016 - Repex RIN response - Jan2020 - Public	
(ii) (D)	additional assets due to other factors (and a description of those factors)			CP RIN016 - Repex RIN response - Jan2020 - Public	

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(b)	For the previous, current and forthcoming regulatory control periods, explain the drivers or factors that have changed network replacement expenditure requirements. Identify and quantify the relative effect of individual matters within the following categories:			CP RIN016 - Repex RIN response - Jan2020 - Public	
(i)	rules, codes, licence conditions, statutory requirements;			CP RIN016 - Repex RIN response - Jan2020 - Public	
(ii)	internal planning and asset management approaches;			CP RIN016 - Repex RIN response - Jan2020 - Public	
(iii)	measurable asset factors that affect the need for expenditure in this category (e.g. age profiles, risk profiles, condition trend, etc.). Identify and quantify individual factors;			CP RIN016 - Repex RIN response - Jan2020 - Public	
(iv)	the external factors that can be forecast and the outcome measured (e.g. demand growth, customer numbers) that affect the need for expenditure in this category. Identify and quantify individual factors, covering the forecasts and the outcome (external factors to be discussed here do not relate to changing obligations which are covered in paragraphs 10.3 and 10.8);			CP RIN016 - Repex RIN response - Jan2020 - Public	
(v)	technology/solutions to address needs, covering:			CP RIN016 - Repex RIN response - Jan2020 - Public	
(v) (A)	network; and			CP RIN016 - Repex RIN response - Jan2020 - Public	
(v) (B)	non-network			CP RIN016 - Repex RIN response - Jan2020 - Public	
(vi)	any other significant matters			CP RIN016 - Repex RIN response - Jan2020 - Public	
(vii)	Identify and provide information or documentation to justify and support any responses to paragraph 5.1(b) (i)-(vi)			CP RIN016 - Repex RIN response - Jan2020 - Public	
The information provided in response to paragraph 5.1(b) above					
6	CONNECTIONS EXPENDITURE				
6.1	Provide and describe the methodology and assumptions used to prepare the forecasts of connection works including	CitiPower - Regulatory proposal - Chapter 5 - Connections, section 5.2 Our forecasting approach		CP MOD 5.01 - Connections - Jan2020 - Public	
6.1 (a)	Estimation of connection unit costs for each customer type; and	CitiPower - Regulatory proposal - Chapter 5 - Connections, section 5.2 Our forecasting approach		CP MOD 5.01 - Connections - Jan2020 - Public	
6.1 (b)	Connection volumes for each customer type	CitiPower - Regulatory proposal - Chapter 5 - Connections, section 5.2 Our forecasting approach		CP MOD 5.01 - Connections - Jan2020 - Public	
6.2	CitiPower must provide its estimation of customer contributions based upon the estimated life and revenue to be recovered from connection assets, including:	CitiPower - Regulatory proposal - Chapter 5 - Connections, section 5.2 Our forecasting approach			
6.2 (a)	the expected life of the connection;	CitiPower - Regulatory proposal - Chapter 5 - Connections, section 5.2 Our forecasting approach		CP ATT033 - Connections policy - Jan2020 - Public, section 3.2	The customer contribution forecast is based on historical ratios (see chapter 5 of our regulatory proposal and connections model). The way we apply connection lives is outlined in the connections policy.
6.2 (b)	the average consumption expected by the customer over the life of the connection; and	CitiPower - Regulatory proposal - Chapter 5 - Connections, section 5.2 Our forecasting approach		CP ATT033 - Connections policy - Jan2020 - Public, section 3.2	The customer contribution forecast is based on historical ratios (see chapter 5 of our regulatory proposal and connections model). The way we apply connection lives is outlined in the connections policy.
6.2 (c)	any other factors that influence the expected recovery of the CitiPower network use of system charge to customers			CP ATT033 - Connections policy - Jan2020 - Public, section 3.2	
7	NON-NETWORK ALTERNATIVES				
7.1	Identify the policies and strategies and procedures in the response to Workbook 1 – Regulatory determination, regulatory template 7.1 which relate to the selection of efficient non-network solutions			CP ATT003 - Demand side engagement - Jul2019 - Public CP ATT002 - DAPR 2019 - Dec2019 - Public	

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
7.2	Explain the extent to which the provision for efficient non-network alternatives has been considered in the development of the forecast capex proposal and the forecast opex proposal				Business cases consider non-network solutions as part of the option analysis. A non-network solution will be recommended when it is the most efficient option that addresses the identified need. Where additional non-network solutions are identified, the capital and operating expenditure forecasts are adjusted accordingly.
7.3	Identify each non-network alternative that CitiPower has:				
7.3 (a)	commenced during the current regulatory control period;	CitiPower - Regulatory proposal - Chapter 3 - Our energy future, section 3.2.3			We commenced our Energy Partner program a behavioural demand response program in partnership with the Royal Automotive Club of Victoria (RACV) to reduce energy at risk. Sensibo thermostat device provides control load with customers compensated \$20 per event.
7.3 (b)	selected to commence during, or will continue into, the forthcoming regulatory control period				We intend to continue our Energy Partner program into the next regulatory period.
7.4	For each non-network alternative identified in the response to paragraph 8.3, provide a description, including cost and location				This program financially rewards households for reducing electricity use for a few hours, on a few select days over the summer months. The program uses Demand Response Enabling Devices (DRED) on customers' air conditioning and targets feeders and distribution transformers that are just above their thermal limits. In 2019/20 the program targeted Albert Park and Armadale (cost estimated to be \$75K) . In future years, the location and cost is dependent on forecast network constraints and demand.
7.5	Provide, for each year of the current regulatory control period, and for the forthcoming regulatory control period, details of each payment made, or expected to be made, by CitiPower to an Embedded Generator in reflection of any costs avoided by deferring augmentation of:				
7.5 (a)	CitiPower's distribution network; or				None planned
7.5 (b)	the relevant transmission network				None planned
8	FORECAST INPUT PRICE CHANGES				
8.1	Provide, in Workbook 1 – Regulatory determination, regulatory template CPI series, the CPI series and index used by CitiPower in its forecast capex proposal and also the CPI series and index used by CitiPower in its forecast opex proposal		CP RIN001 - Workbook 1 - Forecast template - Jan2020 - Public		
8.2	Provide, in Workbook 1 – Regulatory determination, regulatory template 2.14, the capex and opex price changes assumed by CitiPower in its forecast capex proposal and the forecast opex proposal. All price changes must be expressed in percentage year on year real terms		CP RIN001 - Workbook 1 - Forecast template - Jan2020 - Public		
8.3	Provide:				
(a)	the model(s) used to derive and apply the materials price changes, including model(s) developed by a third party;				Not applicable - we are applying no materials escalator for the forecast period
(b)	in relation to labour escalators, a copy of the current Enterprise Bargaining Agreement or equivalent agreement; and				We have not used Enterprise Bargaining Agreements to escalate labour costs. Current agreements are available here: https://www.fwc.gov.au/documents/documents/agreements/fwa/ae423130.pdf https://www.fwc.gov.au/documents/documents/agreements/fwa/ae423370.pdf

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(c)	documents supporting or relied upon that explain the change in the price of goods and services purchased by CitiPower, including evidence that any materials price forecasting method explains the price of materials previously purchased by CitiPower				Not applicable - we are applying no materials escalator for the forecast period
8.4	Provide also an explanation of :				
(a)	the methodology underlying the calculation of each price change, including:			CP ATT014 - BIS Oxford - Labour escalation - Apr2019 - Public CP ATT013 - Frontier - Opex input weights - Mar2019 - Public CP MOD 9.02 - Rate of change - Jan2020 - Public	
(i)	sources;			CP ATT014 - BIS Oxford - Labour escalation - Apr2019 - Public CP ATT013 - Frontier - Opex input weights - Mar2019 - Public CP MOD 9.02 - Rate of change - Jan2020 - Public	
(ii)	data conversions;			CP ATT014 - BIS Oxford - Labour escalation - Apr2019 - Public CP ATT013 - Frontier - Opex input weights - Mar2019 - Public CP MOD 9.02 - Rate of change - Jan2020 - Public	
(iii)	the operation of any model(s) provided under paragraph 8.3(a); and				Not applicable - we are applying no materials escalator for the forecast period
(iv)	the use of any assumptions such as lags or productivity gains			CP ATT014 - BIS Oxford - Labour escalation - Apr2019 - Public CP ATT013 - Frontier - Opex input weights - Mar2019 - Public CP MOD 9.02 - Rate of change - Jan2020 - Public	
(b)	whether the same price changes have been used in developing both the forecast capex proposal and forecast opex proposal; and				For both opex and capex, we escalate labour using Electricity Gas Water and Waste Services wage price index (WPI) and apply no materials escalation. For capex only, we escalate contracts using the Construction sector WPI.
(c)	if the response to paragraph 9.4(b) is negative, why it is appropriate for different expenditure escalators to apply				For opex we have applied the AER's recent approach of segmenting cost inputs into labour and non-labour. For capex we have segmented costs into three inputs, labour, materials and contracts, reflecting the approach accepted by the AER in our 2016-2020 regulatory determination. Our contracted capital services primarily include electrical construction and civil works. The Australian Bureau of Statistics' WPI for the construction sector most closely reflect the types of labour skills required to deliver these contracted services.
8.5	If an agreement provided in response to paragraph 9.3(b) is due to expire during the forthcoming regulatory control period, explain the progress and outcomes of any negotiations to date to review and replace the current agreement				We have not used Enterprise Bargaining Agreements to escalate labour costs. We plan to renegotiate our EBAs in 2020.
9	OPERATING AND MAINTENANCE EXPENDITURE				
Total forecast operating and maintenance expenditure (opex)					
9.1	Provide:				
(a)	the model(s) and the methodology CitiPower used to develop total forecast opex;	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure		CP MOD 10.06 - Opex - Jan2020 - Public CP MOD 9.02 - Rate of change - Jan2020 - Public CP MOD 9.01 - Step changes - Jan2020 - Public	We have applied the base-trend-step approach. Further information is available in our regulatory proposal and supporting models.
(b)	justification for CitiPower's total forecast opex, including:	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure			

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(i)	why the proposed total forecast opex is required for CitiPower to achieve each of the objectives in clause 6.5.6(a) of the NER;	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure			
(ii)	how CitiPower's total forecast opex reasonably reflects each of the criteria in clause 6.5.6(c) of the NER; and	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure			
(iii)	how CitiPower's total forecast opex accounts for the factors in clause 6.5.6(e) of the NER	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure			
9.2	Provide:				
(a)	the quantum of non-recurrent opex for each year of the forthcoming regulatory control period; and				Not applicable - all proposed step changes are recurrent in nature
(b)	an explanation of the driver of each non-recurrent opex item.				Not applicable - all proposed step changes are recurrent in nature
9.3	If CitiPower used a revealed cost base year approach to develop its total forecast opex proposal, provide:				
(a)	in Microsoft Excel format, reconciliation (including all calculations and formulae) of CitiPower's forecast total opex proposal to forecast standard control services opex and dual function assets opex by opex driver in Workbook 1 – Regulatory determination, regulatory template 2.16, tables 2.16.1 and 2.16.3;		CP RIN001 - Workbook 1 - Forecast template - Jan2020 - Public		
(b)	the base year CitiPower used; and	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure	CP RIN001 - Workbook 1 - Forecast template - Jan2020 - Public, template 2.16.1	CP MOD 10.06 - Opex - Jan2020 - Public	We have used the 2019 calendar year as our efficient base operating expenditure.
(c)	explanation and justification for why that base year represents	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure			
9.4	If CitiPower does not use a revealed cost base year approach to develop its total forecast provide:				
(a)	forecast expenditure by opex category in Workbook 1 – Regulatory determination, regulatory template 2.16 for standard control services opex and dual function asset opex in tables 2.16.2 and 2.16.4;				Not applicable
(b)	in Microsoft Excel format, reconciliation (including all calculations and formulae) of CitiPower's total forecast opex proposal to forecast standard control services opex and dual function assets opex by opex category in Workbook 1 – Regulatory determination, regulatory template 2.16, tables 2.16.2 and 2.16.4;				Not applicable
(c)	explanation of major drivers for the increases and decreases in expenditure by opex category in the forthcoming regulatory control period compared to actual historical expenditure;				Not applicable
(d)	explanation and justification for:				Not applicable
(i)	whether CitiPower considers there is a year of historic opex that represents efficient and recurrent costs; or				Not applicable
(ii)	why CitiPower considers no year of historic opex represents efficient and recurrent costs				Not applicable
Output growth					
9.5	Provide the amount of total forecast opex attributable to output growth changes for standard control services opex and dual function assets opex in Workbook 1 – Regulatory determination, regulatory template 2.16, tables 2.16.1 and 2.16.3		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public		
9.6	Provide:				

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(a)	the output growth drivers CitiPower used to develop the amount of total forecast opex attributable to output growth changes;	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure		CP MOD 9.02 - Rate of change - Jan2020 - Public CP APP03 - Maximum demand and customers - Jan2020 - Public	Our output growth drivers are customer numbers, ratcheted maximum demand and circuit length.
(b)	any economies of scale factors applied to the growth drivers;			CP ATT012 - NERA - Output weightings - Dec2018 - Public	We have used the output weightings prepared by NERA. In deriving the output weights, NERA removed the economies of scale by scaling the coefficients to add to one for each of the SFA and LS models. This scaling approach is consistent with the AER's rate of change formula set out in the Expenditure Forecast Assessment Guideline and the final determination for 2016-2020.
(c)	evidence that the growth drivers explain cost changes due	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure		CP ATT012 - NERA - Output weightings - Dec2018 - Public CP ATT052 - Frontier - Review of output growth estimation - Dec2019 - Public CP MOD 9.02 - Rate of change - Jan2020 - Public	We have applied the average of two of the AER's four economic benchmarking models to derive the output weights. We have not used the MTFP or translog models in accordance with the advice from NERA and Frontier Economics.
(d)	if CitiPower applied any composite multiple output growth drivers:				Not applicable
(i)	the inputs for each composite multiple output growth driver; and				Not applicable
(ii)	the weightings for each input.				Not applicable
9.7	Provide an explanation of how, in developing the amount of total forecast opex attributable to output growth changes, CitiPower:				
(a)	applied the output growth drivers; and	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure		CP ATT012 - NERA - Output weightings - Dec2018 - Public CP ATT052 - Frontier - Review of output growth estimation - Dec2019 - Public CP MOD 9.02 - Rate of change - Jan2020 - Public CP APP03 - Maximum demand and customers - Jan2020 - Public	We have multiplied the output weightings by our forecast growth in the output drivers.
(b)	accounted for economies of scale			CP ATT012 - NERA - Output weightings - Dec2018 - Public	We have used the output weightings prepared by NERA. In deriving the output weights, NERA removed the economies of scale by scaling the coefficients to add to one for each of the SFA and LS models. This scaling approach is consistent with the AER's rate of change formula set out in the Expenditure Forecast Assessment Guideline and the final determination for 2016-2020.
Real price changes					
9.8	Provide the amount of total forecast opex attributable to changes in the price of labour and materials for standard control services opex and dual function assets opex in Workbook 1 – Regulatory determination, regulatory template 2.16, tables 2.16.1 and 2.16.3		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public		
9.9	Provide an explanation of:				
(a)	how, in developing the amount of total forecast opex attributable to changes in the price of labour and materials, CitiPower applied the real price measures in Workbook 1 – Regulatory determination, regulatory template 2.14; and	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure		CP MOD 9.02 - Rate of change - Jan2020 - Public CP MOD 10.06 - Opex - Jan2020 - Public	
(b)	whether CitiPower's labour price measure compensates for any form of labour productivity change			CP ATT014 - BIS Oxford - Labour escalation - Apr2019 - Public	Our labour forecasts are based on forecasts of the EGWW WPI prepared by BIS economics. BIS takes account of productivity expectations in preparing their forecasts.
Productivity change					

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
9.10	Provide the amount of total forecast opex attributable to changes in productivity for standard control services opex and dual function assets opex in Workbook 1 – Regulatory determination, regulatory template 2.16, tables 2.16.1 and 2.16.3		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public		
9.11	Provide, in percentage year on year terms, the productivity measure that CitiPower used to develop the amount of total forecast opex attributable to changes in productivity	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure		CP MOD 9.02 - Rate of change - Jan2020 - Public CP MOD 10.06 - Opex - Jan2020 - Public	We have applied the AER's annual 0.5% productivity adjustment in accordance with the AER's final decision on forecasting productivity growth for electricity distributors published in March 2019.
9.12	Provide an explanation of:				
(a)	how, in developing the amount of total forecast opex attributable to changes in productivity, CitiPower applied the productivity measure in paragraph 10.11;			CP MOD 9.02 - Rate of change - Jan2020 - Public CP MOD 10.06 - Opex - Jan2020 - Public	We have applied the AER's annual 0.5% productivity adjustment in accordance with the AER's final decision on forecasting productivity growth for electricity distributors published in March 2019.
(b)	whether CitiPower's forecast productivity changes capture the historic trend of cost increases due to changes in regulatory obligations or requirements and industry best practice; and				We have applied the AER's annual 0.5% productivity adjustment in accordance with the AER's final decision on forecasting productivity growth for electricity distributors published in March 2019.
(c)	whether CitiPower's productivity measure includes productivity change compensated for by the labour price measure used by CitiPower to forecast the change in the price of labour				We have applied the AER's annual 0.5% productivity adjustment in accordance with the AER's final decision on forecasting productivity growth for electricity distributors published in March 2019.
10	STEP CHANGES				
10.1	Provide the amount of total forecast opex attributable to opex step changes for standard control services opex and dual function assets opex in Workbook 1 – Regulatory determination, regulatory template 2.16, tables 2.16.1 and 2.16.3		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public		
10.2	Provide an explanation of why CitiPower considers:				
(a)	the efficient costs of the step change are not provided by other components of CitiPower's total forecast opex such as base opex, output growth changes, real price changes or productivity change;	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure		CP MOD 9.01 - Step changes - Jan2020 - Public	Our step changes are additional costs resulting from new regulatory obligations, opex-capex tradeoffs or changes in the scope of services currently provided which are not already accounted for in our base opex or rate of change. For each step change, business cases provide detailed explanation of the nature of the step change and why it is necessary to achieve the operating expenditure factors, criteria and objectives in the NER. The step change model demonstrates the cost increases additional to our base opex.
(b)	the total forecast opex will not allow CitiPower to achieve the objectives in clause 6.5.6(a) of the NER unless the step change is included; and	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure			Our step changes are additional costs resulting from new regulatory obligations, opex-capex tradeoffs or changes in the scope of services currently provided which are not already accounted for in our base opex or rate of change. For each step change, business cases provide detailed explanation of the nature of the step change and why it is necessary to achieve the operating expenditure factors, criteria and objectives in the NER.

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(c)	the total forecast opex will not reasonably reflect the criteria in clause 6.5.6(c) of the NER unless the step change is included	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure			Our step changes are additional costs resulting from new regulatory obligations, opex-capex tradeoffs or changes in the scope of services currently provided which are not already accounted for in our base opex or rate of change. For each step change, business cases provide detailed explanation of the nature of the step change and why it is necessary to achieve the operating expenditure factors, criteria and objectives in the NER.
10.3	For all step changes in forecast expenditure provide:				
(a)	In Workbook 1 – Regulatory determination, regulatory template 2.17 the quantum of the step changes :		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public	CP MOD 9.01 - Step changes - Jan2020 - Public	
(i)	forecasts for each year of the forthcoming regulatory control period; and		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public	CP MOD 9.01 - Step changes - Jan2020 - Public	
(ii)	expected to be incurred, in the current regulatory control period;		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public	CP MOD 9.01 - Step changes - Jan2020 - Public	
(b)	a description of the step change	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure			
10.4	For each step change listed in response to paragraph 10.3, provide an explanation of:				
(a)	when the change occurred, or is expected to occur;	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure		CP BUS 9.01 - Security of critical infrastructure - Jan2020 - Confidential CP BUS 7.10 - Cloud infrastructure - Jan2020 - Public CP BUS 4.01 - EP amendment Act 2018 - Jan2020 - Public CP BUS 7.09 - 5 minute settlement - Jan2020 - Public CP BUS 6.02 - Solar enablement - Jan2020 - Public CP BUS 9.02 - Yarra Trams - Jan2020 - Public	
(b)	what the driver of the step change is;	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure		CP BUS 9.01 - Security of critical infrastructure - Jan2020 - Confidential CP BUS 7.10 - Cloud infrastructure - Jan2020 - Public CP BUS 4.01 - EP amendment Act 2018 - Jan2020 - Public CP BUS 7.09 - 5 minute settlement - Jan2020 - Public CP BUS 6.02 - Solar enablement - Jan2020 - Public CP BUS 9.02 - Yarra Trams - Jan2020 - Public	
(c)	how the driver has changed or will change (for example, revised legislation may lead to a change in a regulatory obligation or requirement); and	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure		CP BUS 9.01 - Security of critical infrastructure - Jan2020 - Confidential CP BUS 7.10 - Cloud infrastructure - Jan2020 - Public CP BUS 4.01 - EP amendment Act 2018 - Jan2020 - Public CP BUS 7.09 - 5 minute settlement - Jan2020 - Public CP BUS 6.02 - Solar enablement - Jan2020 - Public CP BUS 9.02 - Yarra Trams - Jan2020 - Public	
(d)	whether the step change is recurrent in nature			CP MOD 9.01 - Step changes - Jan2020 - Public	All our proposed step changes are recurrent in nature
10.5	For each step change listed in response to paragraph 10.3, provide justification for when, and how, the step change affected, or is expected to affect:				
(a)	the relevant opex category;			CP MOD 9.01 - Step changes - Jan2020 - Public	

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(b)	the relevant capex category;			CP MOD 9.01 - Step changes - Jan2020 - Public	
(c)	total opex; and			CP MOD 9.01 - Step changes - Jan2020 - Public	
(d)	total capex			CP MOD 9.01 - Step changes - Jan2020 - Public	
10.6	For each step change listed in response to paragraph 10.3, provide the process undertaken by CitiPower to identify and quantify the step change; provide cost benefit analysis that demonstrates CitiPower proposes to address the step change in a prudent and efficient manner, including:				
(a)	the timing of the step change; and			CP BUS 9.01 - Security of critical infrastructure - Jan2020 - Public CP BUS 7.10 - Cloud infrastructure - Jan2020 - Public CP BUS 4.01 - EP amendment Act 2018 - Jan2020 - Public CP BUS 7.09 - 5 minute settlement - Jan2020 - Public CP BUS 6.02 - Solar enablement - Jan2020 - Public CP BUS 9.02 - Yarra Trams - Jan2020 - Public	
(b)	if CitiPower considered a 'do nothing' option, evidence of how CitiPower assessed the risks of this option compared with other options			CP BUS 9.01 - Security of critical infrastructure - Jan2020 - Public CP BUS 7.10 - Cloud infrastructure - Jan2020 - Public CP BUS 4.01 - EP amendment Act 2018 - Jan2020 - Public CP BUS 7.09 - 5 minute settlement - Jan2020 - Public CP BUS 6.02 - Solar enablement - Jan2020 - Public CP BUS 9.02 - Yarra Trams - Jan2020 - Public	
10.7	For each step change listed in response to paragraph 10.3, where the step change is due to a change in a regulatory obligation or requirement provide:				
(a)	relevant variations or exemptions granted to CitiPower during the previous regulatory control period or the current regulatory control period;				Not applicable
(b)	any relevant compliance audits CitiPower conducted during the previous regulatory control period or the current regulatory control period				Not applicable
10.8	For each step change listed in response to paragraph 10.7, provide, with reference to specific clauses of the relevant legislative instrument(s), the:				
(a)	previous regulatory obligation or requirement; and			CP BUS 9.01 - Security of critical infrastructure - Jan2020 - Confidential CP BUS 4.01 - EP amendment Act 2018 - Jan2020 - Public CP BUS 7.09 - 5 minute settlement - Jan2020 - Public CP BUS 9.02 - Yarra Trams - Jan2020 - Public	
(b)	how the changed regulatory obligation or requirement is driving the step change			CP BUS 9.01 - Security of critical infrastructure - Jan2020 - Confidential CP BUS 4.01 - EP amendment Act 2018 - Jan2020 - Public CP BUS 7.09 - 5 minute settlement - Jan2020 - Public CP BUS 9.02 - Yarra Trams - Jan2020 - Public	
Category specific opex					

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
10.9	Provide the amount of total forecast opex attributable to category specific opex in Workbook 1 – Regulatory determination, regulatory template 2.17, table 2.17.5. The amount of total opex attributable to category specific opex must correspond with the category specific opex reported in Workbook 1 – Regulatory determination, regulatory template 2.16, table 2.16.1		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public		
ECONOMIC BENCHMARKING REPORTING					
11	ECONOMIC BENCHMARKING				
11.1	Complete the Workbook 1 – Regulatory determination, regulatory templates 3.1 to 3.7 in accordance with:		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public		
(a)	the ‘Economic Benchmarking RIN for distribution network service providers – Instructions and Definitions’ issued to CitiPower on 28 November 2013, chapters 2 to 9;				Noted
(b)	paragraphs 11.2 to 11.10				Noted
11.2	The forecast revenue groupings in Workbook 1 – Regulatory determination, regulatory templates 3.1, tables 3.1.1 and 3.1.2 may be developed by trending forward actual historical revenue groupings in previous regulatory years. However:				
(a)	Total revenues must equal the total forecast revenues proposed by CitiPower in its regulatory proposal, and				Noted
(b)	Revenue groupings must reflect CitiPower’s forecast demand for its services in the forthcoming regulatory control period in its regulatory proposal				Noted
11.3	11.3 Information provided in Workbook 1 – Regulatory determination, regulatory templates 3.2, tables 3.2.1 and 3.2.2 must reflect CitiPower’s cost allocation method for the forthcoming regulatory control period.				Noted
11.4	RAB asset financial data in the Workbook 1 – Regulatory determination, regulatory template 3.3 must reconcile to that in CitiPower’s regulatory proposal PTRM and RFM				Noted
11.5	The definition of a tree must be applied when completing the variables “Average number of trees per urban and CBD vegetation maintenance span” (DOEF0208) and “Average number of trees per rural vegetation maintenance span” (DOEF0209)				Noted
11.6	In calculating responses to the variables DOEF0202 to DOEF0205, spans in the network service area where CitiPower is not responsible for the vegetation management associated with the span are not to be counted				Noted
11.7	“Total number of spans” (DOEF0205) does not include service line spans				Noted
11.8	CitiPower must report the route line length of feeders classified as either short rural or long rural divided by the total route feeder line length (this is the total feeder route line length for all CBD, urban, short rural and long rural feeders) against “Rural proportion” (DOEF0201)				Noted
11.9	For the purposes of calculating the “Route line length” variable (DOEF0301) or other variables measured in terms of route line length:				

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(a)	the length of service lines are not to be counted				Noted
(b)	the length of a span that shares multiple voltage levels is only to be counted once				Noted
(c)	the lengths of two sets of lines that run on different sets of poles (or towers) but share the same easement are counted separately				Noted
11.10	All forecast variables in the Workbook 1 – Regulatory determination, regulatory templates 3.1 to 3.7 must align with those in CitiPower’s regulatory proposal. For the avoidance of doubt this includes forecast:				
(a)	opex and capex;				Noted
(b)	maximum demand, energy delivery;				Noted
(c)	revenues;				Noted
(d)	quality of services variables including SAIDI, SAIFI, MAIFI and MAIFLe; and				Noted
(e)	quantities of physical assets				Noted
ALTERNATIVE CONTROL SERVICES REPORTING					
12	ALTERNATIVE CONTROL SERVICES				
12.1	The overheads relating to each alternative control service listed in paragraph 12.2 must be disclosed			CP APP09 - ACS charges - Jan2020 - Public CP MOD 12.01 - Fee based - Jan2020 - Public	The overheads relating to each ACS for the next regulatory period is consistent with our overheads approved by the AER in the 2016-2020 regulatory determination, escalated to \$June 2021 using the forecast consumer price index.
12.2	Provide a list of all of the alternative control services that CitiPower intends to provide to customers and levy charges for in the forthcoming regulatory control period			CP APP09 - ACS charges - Jan2020 - Public CP MOD 12.01 - Fee based - Jan2020 - Public	
12.3	Provide a definition of each alternative control service listed in paragraphs 13, 14 and 15	CitiPower Regulatory proposal - Chapter 12 Alternative control services			
12.4	For each alternative control service listed in paragraphs 13, 14 and 15, specify the charges applicable during each year of the current regulatory control period. Also include proposed charges for each year of the forthcoming regulatory control period			CP MOD 12.01 - Fee based - Jan2020 - Public CP MOD 12.02 - Quoted services labour rate - Jan2020 - Public CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public CP MOD 13.01 - Public lighting - Jan2020 - Public CP APP09 - ACS charges - Jan2020 - Public CP ATT140 - AER - Pricing proposal 2016 - Oct2015 - Public CP ATT141 - AER - Pricing proposal 2017 - Oct2016 - Public CP ATT142 - AER - Pricing proposal 2018 - Oct2017 - Public CP ATT143 - AER - Pricing proposal 2019 - Oct2018 - Public CP ATT144 - AER - Pricing proposal 2020 - Nov2019 - Public	Information relating to current period is available in our annual pricing proposals. Information relating to the forecast period is available in our attached models and appendices.

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
12.5	For each alternative control service listed in paragraphs 13, 14 and 15, specify the total revenue earned by CitiPower in each year of the current regulatory control period and forecast to be earned in the forthcoming regulatory control period		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public	CP MOD 12.01 - Fee based - Jan2020 - Public CP MOD 12.02 - Quoted services labour rate - Jan2020 - Public CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public CP MOD 13.01 - Public lighting - Jan2020 - Public CP APP09 - ACS charges - Jan2020 - Public CP ATT140 - AER - Pricing proposal 2016 - Oct2015 - Public CP ATT141 - AER - Pricing proposal 2017 - Oct2016 - Public CP ATT142 - AER - Pricing proposal 2018 - Oct2017 - Public CP ATT143 - AER - Pricing proposal 2019 - Oct2018 - Public CP ATT144 - AER - Pricing proposal 2020 - Nov2019 - Public	Information relating to current period is available in our annual pricing proposals. Information relating to the forecast period is available in our attached models and appendices and Reset RIN workbook 1.
12.6	For each alternative control service listed in paragraphs 13, 14 and 15, provide the labour rate(s) used to calculate the charges for the current and forthcoming regulatory control periods:			CP MOD 12.01 - Fee based - Jan2020 - Public CP MOD 12.02 - Quoted services labour rate - Jan2020 - Public CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public CP MOD 13.01 - Public lighting - Jan2020 - Public	
(a)	specify the labour classification level used to provide the services e.g. outsourced or internally provided and labourer type			CP MOD 12.01 - Fee based - Jan2020 - Public CP MOD 12.02 - Quoted services labour rate - Jan2020 - Public CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public CP MOD 13.01 - Public lighting - Jan2020 - Public	
(b)	list all direct costs, and their quantum, in the make-up of the labour rate(s)			CP MOD 12.01 - Fee based - Jan2020 - Public CP MOD 12.02 - Quoted services labour rate - Jan2020 - Public CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public CP MOD 13.01 - Public lighting - Jan2020 - Public	
12.7	List each material category (e.g. meters, poles, brackets) required for the provision of each alternative control service listed in the response to paragraphs 13, 14 and 15				
(a)	provide a description of each material category			CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public CP MOD 13.01 - Public lighting - Jan2020 - Public	
(b)	provide the average unit costs for each material category			CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public CP MOD 13.01 - Public lighting - Jan2020 - Public	
(c)	list all direct costs included in the unit costs			CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public CP MOD 13.01 - Public lighting - Jan2020 - Public	
(d)	specify the calculation of the quantum of direct materials costs included in the unit cost of materials			CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public CP MOD 13.01 - Public lighting - Jan2020 - Public	
13	FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES				
13.1	Provide a description of each fee based and quoted service, explaining the purpose of the service and list the activities which comprise each service. The list of fee based and quoted services should be consistent with those services listed in CitiPower's annual pricing proposals	Regulatory proposal - chapter 12 Alternative control services		CP MOD 12.01 - Fee based - Jan2020 - Public CP MOD 12.02 - Quoted services labour rate - Jan2020 - Public CP APP09 - ACS charges - Jan2020 - Public	Our regulatory proposal describes the charges and categorisation, our ACS appendix provides the charges, our ACS models provide the calculations.
13.2	Provide all current and proposed charges for each fee based and quoted alternative control services in the current and forthcoming regulatory control periods, and:				

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(a)	specify if the charges are for fee based and/or quoted alternative services	Regulatory proposal - chapter 12 Alternative control services		CP MOD 12.01 - Fee based - Jan2020 - Public CP MOD 12.02 - Quoted services labour rate - Jan2020 - Public CP APP09 - ACS charges - Jan2020 - Public CP ATT140 - AER - Pricing proposal 2016 - Oct2015 - Public CP ATT141 - AER - Pricing proposal 2017 - Oct2016 - Public CP ATT142 - AER - Pricing proposal 2018 - Oct2017 - Public CP ATT143 - AER - Pricing proposal 2019 - Oct2018 - Public CP ATT144 - AER - Pricing proposal 2020 - Nov2019 - Public	Our regulatory proposal describes the charges and categorisation, our ACS appendix provides the charges, our ACS models provide the calculations. Current period information is provided in the annual pricing proposals.
(b)	explain the reasons for the different charges with reference to alternative services	Regulatory proposal - chapter 12 Alternative control services		CP MOD 12.01 - Fee based - Jan2020 - Public CP MOD 12.02 - Quoted services labour rate - Jan2020 - Public CP APP09 - ACS charges - Jan2020 - Public CP ATT140 - AER - Pricing proposal 2016 - Oct2015 - Public CP ATT141 - AER - Pricing proposal 2017 - Oct2016 - Public CP ATT142 - AER - Pricing proposal 2018 - Oct2017 - Public CP ATT143 - AER - Pricing proposal 2019 - Oct2018 - Public CP ATT144 - AER - Pricing proposal 2020 - Nov2019 - Public	Our regulatory proposal describes the charges and categorisation, our ACS appendix provides the charges, our ACS models provide the calculations. Current period information is provided in the annual pricing proposals.
(c)	explain the method used to set the different charges; and alternative services	Regulatory proposal - chapter 12 Alternative control services		CP MOD 12.01 - Fee based - Jan2020 - Public CP MOD 12.02 - Quoted services labour rate - Jan2020 - Public CP APP09 - ACS charges - Jan2020 - Public CP ATT140 - AER - Pricing proposal 2016 - Oct2015 - Public CP ATT141 - AER - Pricing proposal 2017 - Oct2016 - Public CP ATT142 - AER - Pricing proposal 2018 - Oct2017 - Public CP ATT143 - AER - Pricing proposal 2019 - Oct2018 - Public CP ATT144 - AER - Pricing proposal 2020 - Nov2019 - Public	Our regulatory proposal describes the charges and categorisation, our ACS appendix provides the charges, our ACS models provide the calculations. Current period information is provided in the annual pricing proposals.
(d)	provide the calculations underpinning the different charges			CP MOD 12.01 - Fee based - Jan2020 - Public CP MOD 12.02 - Quoted services labour rate - Jan2020 - Public CP APP09 - ACS charges - Jan2020 - Public CP ATT140 - AER - Pricing proposal 2016 - Oct2015 - Public CP ATT141 - AER - Pricing proposal 2017 - Oct2016 - Public CP ATT142 - AER - Pricing proposal 2018 - Oct2017 - Public CP ATT143 - AER - Pricing proposal 2019 - Oct2018 - Public CP ATT144 - AER - Pricing proposal 2020 - Nov2019 - Public	Our regulatory proposal describes the charges and categorisation, our ACS appendix provides the charges, our ACS models provide the calculations. Current period information is provided in the annual pricing proposals.
13.3	Identify the tasks involved in providing the service described in response to paragraph 13.1, including:				

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(a)	mapping the class of labour required to provide the service;				Not applicable - For existing charges prices are escalated by CPI to \$2021. For new charges, we have used a volume-weighted revenue neutral approach to develop the charges.
(b)	the number of workers required to undertake the task and deliver the service				Not applicable - For existing charges prices are escalated by CPI to \$2021. For new charges, we have used a volume-weighted revenue neutral approach to develop the charges.
(c)	the average time required to complete the task and deliver the service				Not applicable - For existing charges prices are escalated by CPI to \$2021. For new charges, we have used a volume-weighted revenue neutral approach to develop the charges.
13.4	If materials are required to provide the service, specify each material category				Not applicable - For existing charges prices are escalated by CPI to \$2021. For new charges, we have used a volume-weighted revenue neutral approach to develop the charges.
14	METERING ALTERNATIVE CONTROL SERVICES				
14.1	For metering alternative control services for the current regulatory control period and the forthcoming regulatory control period, provide details of the:				
(a)	direct materials and direct labour costs;			2016-2018: Category Analysis RINs, tab 2.12 Input tables. CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input Capex' tab	2016-2018 information is provided in the category analysis RINs. 2019-2026 information is provided in our metering cost model.
(b)	installation costs			2016-2018: Category Analysis RINs, tab 4.2: Metering. CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input Capex' tab	2016-2018 information is provided in the category analysis RINs. 2019-2026 information is provided in our metering cost model.
(c)	meter purchase costs;			2016-2018: Category Analysis RINs, tab 4.2: Metering. CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input Capex' tab	2016-2018 information is provided in the category analysis RINs. 2019-2026 information is provided in our metering cost model.
(d)	volumes of work;			2016-2018: Category Analysis RINs, tab 4.2: Metering. CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input Capex' tab	2016-2018 information is provided in the category analysis RINs. 2019-2026 information is provided in our metering cost model.
(e)	other costs associated with providing metering services;			2016-2018: Category Analysis RINs, tab 4.2: Metering. CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input Capex' tab	2016-2018 information is provided in the category analysis RINs. 2019-2026 information is provided in our metering cost model.
(f)	type of meters installed and forecast to be installed, separately for new meters and for replacement meters;			2016-2018: Category Analysis RINs, tab 4.2: Metering. CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input Capex' tab	2016-2018 information is provided in the category analysis RINs. 2019-2026 information is provided in our metering cost model.
(g)	the volume of meters by type set out in (f) and the revenue earned and forecast to be earned by each meter type; and			2016-2018: Category Analysis RINs, tab 4.2: Metering. 2016-2018: Economic Benchmarking RINs, tab 3.1: Revenue CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input Capex' tab CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public, 'Forecast revenues' tab	2016-2018 information is provided in the category analysis and economic benchmarking RINs. 2019-2026 information is provided in our metering cost model and PTRM model.
(h)	the total operating and maintenance costs incurred, and forecast to be incurred, for metering services			CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input opex' tab	2016-2026 information is provided in our metering cost model.

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
14.2	For metering works, for each year of the current regulatory control period and forecasts for the forthcoming regulatory control period, provide a description of:				
(a)	the type of work undertaken (e.g. meter reconfiguration, special meter read) including a description of the activities undertaken to provide the service;				We are currently responsible for metering services associated with types 5, 6 and smart meters. These meters are installed in residential and small business premises consuming up to 160 megawatt hours (MWh) per annum. The services we provide in relation to these meters include: • meter provision – includes purchasing meters and installing these meters at the customer’s premises; • meter maintenance – includes inspecting, testing, maintaining and repairing meters; • meter replacement - replacement of a meter and associated equipment, at a site with existing metering infrastructure, with a modern equivalent where the meter has reached the end of its economic life; • meter reading and data services - includes collection, processing, storage and delivery of metering data to other market participants for billing and market settlement purposes and the management of the relevant National Meter Identifier (NMI); and • meter communications – includes maintaining and installing communication devices required to operate the mesh radio network and management of the day to day operation of the meter communications systems including meter data delivery, testing, fault detection, investigation and resolution
(b)	the labour costs involved in providing the service, including any overheads;			2016-2018: Category Analysis RINs, tab 4.2: Metering. 2019-2026: CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input opex' tab	
(c)	any materials costs involved in providing the service;			2016-2018: Category Analysis RINs, tab 4.2: Metering. 2019-2026: CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input opex' tab	
(d)	the number (volume) of services provided and associated assumptions on which the volume of service was derived or estimated;			2016-2018: Category Analysis RINs, tab 4.2: Metering. 2019-2026: CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input opex' tab	
(e)	the charge per service; and			CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public, 'Forecast revenues' tab	
(f)	the revenue earned by each service			CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public, 'Forecast revenues' tab	
14.3	For metering alternative control services, specify the number of customers receiving the service in each year of the current regulatory control period, and forecasts for the forthcoming regulatory control period			CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Inputs General' tab CP MOD 11.02 - Metering PTRM & exit fees 2021-26 - Jan2020 - Public, 'Forecast revenues' tab	
15	PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES				
15.1	Specify which items are capex and operational expenditure for each year of the current regulatory control period and forecasts for the forthcoming regulatory control period			CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input_Opex' tab and 'Input_Capex tab'; CP MOD 13.02 - Public lighting inputs - Jan2020 - Public	

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
15.2	Provide unit costs for the current regulatory control period and forecast for the forthcoming regulatory control period for:				
(a)	luminaires;			CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input_Opex' tab and 'Input_Capex tab' CP MOD 13.01 - Public lighting - Jan2020 - Public, Inputs tabs	
(b)	dedicated street lighting poles;			CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input_Opex' tab and 'Input_Capex tab' CP MOD 13.01 - Public lighting - Jan2020 - Public, Inputs tabs	
(c)	brackets;			CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input_Opex' tab and 'Input_Capex tab' CP MOD 13.01 - Public lighting - Jan2020 - Public, Inputs tabs	
(d)	lamps;			CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input_Opex' tab and 'Input_Capex tab' CP MOD 13.01 - Public lighting - Jan2020 - Public, Inputs tabs	
(e)	photoelectric cells;			CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input_Opex' tab and 'Input_Capex tab' CP MOD 13.01 - Public lighting - Jan2020 - Public, Inputs tabs	
(f)	labour rate (per hour);			CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input_Opex' tab and 'Input_Capex tab' CP MOD 13.01 - Public lighting - Jan2020 - Public, Inputs tabs	
(g)	miscellaneous materials			CP MOD 11.04 - Metering cost model - Jan2020 - Public, 'Input_Opex' tab and 'Input_Capex tab' CP MOD 13.01 - Public lighting - Jan2020 - Public, Inputs tabs	
15.3	Provide the depreciation period in years for each type of luminaire			CP MOD 13.01 - Public lighting - Jan2020 - Public, Inputs tabs	
15.4	Provide the bulk change cycle in years for lamps and photoelectric cells			CP MOD 13.01 - Public lighting - Jan2020 - Public, Inputs tabs	
15.5	Provide details of the average replacement age of each type of luminaire			CP MOD 13.02 - Public lighting inputs - Jan2020 - Public	
15.6	Provide the number of luminaires, by type, for the current and forthcoming regulatory control periods			CP MOD 13.01 - Public lighting - Jan2020 - Public, DNSP Inputs General tab	
15.7	Provide the number of luminaires, poles and brackets replaced per year, for the current and forthcoming regulatory control periods			CP MOD 13.01 - Public lighting - Jan2020 - Public, DNSP Inputs capex tab	
15.8	Provide details, including assumptions used, for any other costs that are incurred for the provision of public lighting services			CP MOD 13.02 - Public lighting inputs - Jan2020 - Public CP MOD 13.01 - Public lighting - Jan2020 - Public, Inputs tabs	
15.9	Provide models and/or modelling that underpins proposed charges for the forthcoming regulatory control period and the reasons for the assumptions behind those forecasts			CP MOD 13.02 - Public lighting inputs - Jan2020 - Public CP MOD 13.01 - Public lighting - Jan2020 - Public, Inputs tabs	
15.10	For public lighting alternative control services, specify the number of customers in each year of the current regulatory control period, and forecasts for the forthcoming regulatory control period			CP MOD 13.02 - Public lighting inputs - Jan2020 - Public, Inputs General tab	
NETWORK INFORMATION REPORTING					
16	DEMAND AND CONNECTIONS FORECASTS				
16.1	Provide and describe the methodology used to prepare the following forecasts for the forthcoming regulatory control period				

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(a)	maximum demand; and			CP APP03 - Maximum demand and customers - Jan2020 - Public CP ATT022 - CIE - Maximum demand forecasting - Mar2019 - Public	
(b)	number of new connections	CitiPower - Regulatory proposal - Chapter 5 Connections		CP MOD 5.01 - Connections - Jan2020 - Public	
16.2	Provide:				
(a)	the model(s) CitiPower used to forecast new connections and maximum demand;			CP MOD 9.04 - Maximum demand forecasts - Jan2020 - Public CP MOD 5.01 - Connections - Jan2020 - Public	
(b)	where CitiPower’s approach to weather correction has changed since demand forecasts were submitted to the AER as part of the previous regulatory determination, provide historically consistent weather corrected maximum demand data, as per the format in Workbook 1 – Regulatory determination, regulatory templates 3.4 and 5.4 using CitiPower’s current approach. If any of this data is unavailable, explain why;				Approach to weather correction has not changed
(c)	for new connections, volume expenditure data requested in Workbook 1 – Regulatory determination, regulatory template 2.5; and		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public	CP MOD 5.01 - Connections - Jan2020 - Public	
(d)	any supporting information or calculations that illustrate how information extracted from CitiPower’s forecasting model(s) reconciles to, and explains any differences from, information provided in Workbook 1 – Regulatory determination, regulatory templates 2.5, 3.4 and 5.4			CP ATT011 - ENEA - Forecast reconciliations - Feb2019 - Public	
16.3	For each of the methodologies provided and described in response to paragraph 16.1, and, where relevant, data requested under paragraphs 16.2(b) and 16.2(c), explain or provide (as appropriate):				
(a)	the models used;			CP MOD 9.04 - Maximum demand forecasts - Jan2020 - Public CP MOD 5.01 - Connections - Jan2020 - Public	
(b)	a global (top-down) and spatial (bottom-up) demand forecast			CP ATT011 - ENEA - Forecast reconciliations - Feb2019 - Public	
(c)	the inputs and assumptions used in the models (including in relation to economic growth, connections numbers and policy changes and provide any associated models or data relevant to justifying these inputs and assumptions);	CitiPower - Regulatory proposal - Chapter 5 Connections		CP ATT022 - CIE - Maximum demand forecasting - Mar2019 - Public CP MOD 9.04 - Maximum demand forecasts - Jan2020 - Public CP MOD 5.01 - Connections - Jan2020 - Public CP ATT050 - ACIF - Australian construction market - Nov2018 - Public CP ATT098 - ACIF - Australian construction market - May2019 - Public	
(d)	the weather correction methodology, how weather data has been used, and how CitiPower’s approach to weather correction has changed over time;			CP ATT022 - CIE - Maximum demand forecasting - Mar2019 - Public	
(e)	an outline of the treatment of block loads, transfers and switching within the forecasting process;			CP ATT022 - CIE - Maximum demand forecasting - Mar2019 - Public	
(f)	each appliance model used, where used, or assumptions relating to average customer energy usage (by customer type);			CP ATT022 - CIE - Maximum demand forecasting - Mar2019 - Public	

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(g)	how the forecasting methodology used is consistent with, and takes into account, historical observations (where appropriate), including any calibration processes undertaken within the model (specifically whether the load forecast is matched against actual historical load on the system and substations);			CP ATT022 - CIE - Maximum demand forecasting - Mar2019 - Public	
(h)	how the resulting forecast data is consistent across forecasts provided for each network element identified in Workbook 1 – Regulatory determination, regulatory template 5.4 and system wide forecasts;			CP ATT011 - ENEA - Forecast reconciliations - Feb2019 - Public	
(i)	how the forecasts resulting from these methods and assumptions have been used in determining the following:				
(i)	capex forecasts; and	CitiPower - Regulatory proposal - Chapter 5 Connections and Chapter 6 Augmentation		CP MOD 5.01 - Connections - Jan2020 - Public	Connection volumes and unit rates are used to determine the connection capex forecasts - refer to connections model. Demand forecasts underpin the identification of forecast network constraints. Our regulatory proposal and demand-driven augmentation capital expenditure business cases demonstrate the impact of spatial demand forecasts on local network capacity and provide options analysis for addressing network constraints.
(ii)	opex forecasts	CitiPower - Regulatory proposal - Chapter 9 Operating expenditure		CP MOD 9.02 - Rate of change - Jan2020 - Public	Demand forecasts are used in the output growth component of the rate of change for forecasting operating expenditure.
(j)	whether CitiPower used the forecasting model(s) it used in the joint planning process for the purposes of its regulatory proposal;				Yes, we use the same models for the regulatory proposal as for the joint planning process
(k)	whether CitiPower’s forecasts both coincident and non-coincident maximum demand at the feeder, connection point, sub-transmission substation and zone substation level, and how these forecasts reconcile with the system level forecasts (including how various assumptions that are allowed for at the system level relate to the network level forecasts);			CP ATT022 - CIE - Maximum demand forecasting - Mar2019 - Public CP ATT011 - ENEA - Forecast reconciliations - Feb2019 - Public	
(l)	whether CitiPower records historic maximum demand in MW, MVA or both;				Record MW at network level. Record MW and MVA at spatial level
(m)	the probability of exceedance that CitiPower uses in network planning;			CP ATT002 - DARP 2019 - Dec2019 - Public, sections 4 and 5	
(n)	the contingency planning process, in particular the process used to assess high system demand;			CP ATT002 - DARP 2019 - Dec2019 - Public, sections 4 and 5	
(o)	how risk is managed across the network, particularly in relation to load sharing across network elements and non-network solutions to peak demand events;			CP ATT002 - DARP 2019 - Dec2019 - Public, sections 4 and 5	
(p)	whether and how the maximum demand forecasts underlying the regulatory proposal reconcile with any demand information or related planning statements published by AEMO, as well as forecasts produced by any transmission network service providers connected to CitiPower’s network;			CP ATT022 - CIE - Maximum demand forecasting - Mar2019 - Public	CIE's Demand forecasting report provides a comparison to AEMO's forecasts. Where significant differences are identified we work with AEMO to understand the reason for any discrepancy.
(q)	how the normal and emergency ratings are used in determining capacity for individual zone substations and sub-transmission lines;			CP ATT002 - DARP 2019 - Dec2019 - Public, sections 4 and 5	

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(r)	where CitiPower proposes to commence or continue a demand-related capex project or program during the forthcoming regulatory control period on a HV feeder:				
(i)	for each feeder from the zone substation that is the connecting zone substation for the relevant HV feeder, and any other feeders that the relevant HV feeder can transfer load to or from:				
(A)	assumed future load transfers between feeders;			CP ATT066 - Feeder loads and transfers report - Dec2019 - Public	
(B)	assumed feeder underlying load growth rates (exclusive of transfers and specific customer developments); and			CP ATT066 - Feeder loads and transfers report - Dec2019 - Public	
(C)	assumed block loads, and associated demand assumptions;			CP ATT066 - Feeder loads and transfers report - Dec2019 - Public	
(ii)	existing embedded generation capacity, and associated assumptions on the impact on demand levels;			CP ATT066 - Feeder loads and transfers report - Dec2019 - Public	
(iii)	assumed future embedded generation capacity, and associated assumptions on the impact on demand levels;			CP ATT066 - Feeder loads and transfers report - Dec2019 - Public	
(iv)	existing non-network solutions, and the associated assumptions on the impact on demand levels;			CP ATT066 - Feeder loads and transfers report - Dec2019 - Public	
(v)	assumed future non-network solutions, and associated assumptions on the impact on demand levels; and			CP ATT066 - Feeder loads and transfers report - Dec2019 - Public	
(vi)	the diversity between feeders;			CP ATT066 - Feeder loads and transfers report - Dec2019 - Public	
(s)	where CitiPower proposes to commence or continue a demand-related capex project or program during the forthcoming regulatory control period on a zone substation (or relevant substations for a sub-transmission line):				
(i)	assumed future load transfers between related substations;			CP ATT065 - Substation loads, transfers report - Dec2019 - Public	
(ii)	assumed underlying load growth rates (exclusive of transfers and specific customer developments);			CP ATT065 - Substation loads, transfers report - Dec2019 - Public	
(iii)	assumed specific customer developments, and associated demand assumptions;			CP ATT065 - Substation loads, transfers report - Dec2019 - Public	
(iv)	existing embedded generation capacity, and associated assumptions on the impact on demand levels;			CP ATT065 - Substation loads, transfers report - Dec2019 - Public	
(v)	assumed future embedded generation capacity, and associated assumptions on the impact on demand levels;			CP ATT065 - Substation loads, transfers report - Dec2019 - Public	
(vi)	existing non-network solutions, and the associated assumptions on the impact on demand levels;			CP ATT065 - Substation loads, transfers report - Dec2019 - Public	
(vii)	assumed future non-network solutions, and associated assumptions on the impact on demand levels; and			CP ATT065 - Substation loads, transfers report - Dec2019 - Public	
(viii)	diversity with related substations			CP ATT065 - Substation loads, transfers report - Dec2019 - Public	
16.4	Provide:				

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(a)	evidence that any independent verifier engaged by CitiPower has examined the reasonableness of the method, processes and assumptions in determining the forecasts and has sufficiently capable expertise in undertaking a verification of forecasts; and				The connection point forecasts were provided by independent forecasters, the Centre for International Economics (CIE). CIE used the same overall methodology they used in our regulatory proposal for 2016-2020. In 2014, Rob Hyndman, the Professor of Statistics and Head of the Department of Econometrics and Business Statistics, reviewed CIE's modelling methodology, with the final methodology incorporated comments he made.
(b)	all documentation, analysis and models evidencing the results of the independent verification.				Not applicable. CIE are an independent forecaster and our demand forecasts are therefore considered to be independently verified.
INCENTIVE SCHEMES AND OTHER REPORTING					
17	EFFICIENCY BENEFIT SHARING SCHEME				
17.1	For the purposes of applying the efficiency benefit sharing scheme:				
(a)	identify all cost categories proposed to be excluded from the operation of the efficiency benefit sharing scheme;	CitiPower - Regulatory proposal - Chapter 10 - Revenue			We propose excluding debt raising costs, demand management innovation allowance and guaranteed service level (GSL) payments from the calculation of the 2021-2026 EBSS carryover.
(b)	explain for each cost category identified in the response to paragraph 17.1(a) the reasons for the proposed exclusion	CitiPower - Regulatory proposal - Chapter 10 - Revenue			These exclusions are consistent with the AER's 2016-2020 final determination for calculating the EBSS carryover.
18	SERVICE TARGET PERFORMANCE INCENTIVE SCHEME				
18.1	Provide CitiPower's detailed methodology for calculating the following parameters used in the STPIS;				
(a)	the SAIDI, SAIFI, MAIFI and MAIFLe targets for each supply	CitiPower - Regulatory proposal - Chapter 10 - Revenue		CP MOD 10.12 - Targets - Jan2020 - Public	We propose calculating the SAIDI, SAIFI and MAIFLe targets in accordance with the AER's 2018 STPIS scheme. To calculate the targets we: <ul style="list-style-type: none"> used historical performance data over the five year period from 1 January 2015 to 31 December 2019 recast our historical data to align with the new definitions in the AER's Distribution Reliability Measures Guideline 2018.
(b)	the customer service parameters and targets;	CitiPower - Regulatory proposal - Chapter 10 - Revenue		CP MOD 10.12 - Targets - Jan2020 - Public CP MOD 10.11 - Incentives - Jan2020 - Public	We propose calculating the customer services targets and incentive rates in accordance with the AER's 2018 STPIS scheme. To calculate the customer incentive targets we used historical performance data over the five year period from 1 January 2015 to 31 December 2019.
(c)	daily SAIDI, SAIFI, MAIFI and MAIFLe and customer service performance;	CitiPower - Regulatory proposal - Chapter 10 - Revenue		CP MOD 10.12 - Targets - Jan2020 - Public	The daily performance data for SAIDI, SAIFI and MAIFLe are sourced from our outage management system. Daily customer service data are sourced from our salesforce system.
(d)	the MED threshold derived from the daily SAIDI data;	CitiPower - Regulatory proposal - Chapter 10 - Revenue		CP MOD 10.12 - Targets - Jan2020 - Public	MED threshold for 2021/22 is calculated in accordance with the STPIS guideline.
(e)	the incentive rates to apply to each supply reliability area	CitiPower - Regulatory proposal - Chapter 10 - Revenue		CP MOD 10.11 - Incentives - Jan2020 - Public	We propose calculating the SAIDI, SAIFI and MAIFLe incentive rates in accordance with the AER's 2018 STPIS scheme.

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
	Note: All calculations must be made in accordance with the STPIS and using data which complies with the STPIS definitions. CitiPower must provide their SAIDI, SAIFI, MAIFI and MAIFle targets for each supply reliability area based on historical data and not its forecast SAIDI, SAIFI, MAIFI and MAIFle for each supply reliability area	CitiPower - Regulatory proposal - Chapter 10 - Revenue		CP MOD 10.12 - Targets - Jan2020 - Public	Noted
18.2	If CitiPower proposes adjustments to the STPIS targets away from those based upon raw historical data CitiPower must provide, in respect of each adjustment:				
(a)	the reasons for the adjustment;				Not applicable
(b)	the quantum of the adjustment, and the effect of the adjustment on the targets for each of the supply reliability areas; and				Not applicable
(c)	the method, basis and empirical data used as justification for the adjustment				Not applicable
18.3	Provide the data required in Workbook 1 – Regulatory determination, regulatory templates 6.1 and 6.2		CP RIN001 - Workbook 1 - Forecast templates - Jan2020 - Public		
19	PROPOSED CONTINGENT PROJECTS				
19.1	For each contingent project proposed in the regulatory proposal, provide:				
(a)	a description of the proposed contingent project, including reasons why CitiPower considers the project should be accepted as a contingent project for the forthcoming regulatory control period;				Not applicable
(b)	the proposed contingent capex which CitiPower considers is reasonably required for the purpose of undertaking the proposed contingent project;				Not applicable
(c)	the methodology used for developing that forecast and the key assumptions that underlie it;				Not applicable
(d)	information that demonstrates that the undertaking of the proposed contingent project is reasonably required to meet one or more of the objectives referred to in clause 6.6A.1(b)(1) of the NER;				Not applicable
(e)	a demonstration that the proposed contingent capex for each proposed contingent project:				Not applicable
(i)	is not included (either in part or in whole) in CitiPower’s proposed total forecast capex for the forthcoming regulatory control period;				Not applicable
(ii)	reasonably reflects the capex criteria, taking into account the capex factors, in the context of the proposed contingent project; and				Not applicable
(iii)	exceeds either \$30 million (\$nominal) or 5 per cent of CitiPower’s proposed annual revenue requirement for the first year of the forthcoming regulatory control period, whichever is larger amount.				Not applicable
(f)	the proposed trigger events relating to the proposed contingent project				Not applicable
19.2	For each proposed trigger event relating to the proposed contingent project referred to in paragraph 19.1(f), demonstrate:				
(a)	the proposed trigger event is reasonably specific and capable of objective verification;				Not applicable
(b)	the occurrence of the proposed trigger event makes the undertaking of the proposed contingent project reasonably necessary in order to achieve any of the capex objectives;				Not applicable

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
(c)	the proposed trigger event generates increased costs or categories of costs that relate to a specific location rather than a condition or event that affects the network as a whole;				Not applicable
(d)	the proposed trigger event is described in such terms that the occurrence of that event or condition is all that is required for the distribution determination to be amended under clause 6.6A.2 of the NER;				Not applicable
(e)	the proposed trigger event is a condition or event, the occurrence of which is probable during the forthcoming regulatory control period, but the inclusion of capex in relation to the proposed trigger event under clause 6.5.7 of the NER is not appropriate because:				Not applicable
(i)	it is not sufficiently certain that the event or condition will occur during the forthcoming regulatory control period or if it may occur after that regulatory control period or not at all; or				Not applicable
(ii)	the costs associated with the event or condition are not sufficiently certain				Not applicable
19.3	Provide a summary of CitiPower's proposed contingent projects for the forthcoming regulatory control period, including the proposed contingent capex and trigger events for each proposed contingent project in the Workbook 1 – Regulatory determination, regulatory template 7.2				Not applicable
20	REVENUES FOR STANDARD CONTROL SERVICES				
20.1	Provide CitiPower's calculation of the unsmoothed and smoothed revenues for each year of the forthcoming regulatory control period using the AER's post-tax revenue model, which is to be submitted as part of CitiPower's regulatory proposal	CitiPower - Regulatory proposal - Chapter 10 - Revenue		CP MOD 10.02 - PTRM 2021-26 - Jan2020 - Public	
20.2	Provide details of any departure from the AER's post-tax revenue model for the calculations referred to in paragraph 21.1 and the reasons for that departure				Not applicable.
21	INDICATIVE IMPACT ON ANNUAL ELECTRICITY BILLS				
21.1	For the purposes of calculating the impact of CitiPower's regulatory proposal on the annual electricity bill of typical residential and business customers in «State_the_Network_operates_in», provide the data/information required in Workbook 7 – Indicative Bill Impact, regulatory template 7.6. Provide the data source for each input used for the calculation		CP RIN007 - Workbook 7 – Indicative Bill Impact, regulatory template 7.6		
21.2	The data/information required in Workbook 7 – Indicative Bill Impact, regulatory template 7.6, must not include any data/information in relation to any applicable transmission or jurisdictional scheme pass through costs				Noted
22	PROPOSED TARIFF STRUCTURE STATEMENT				
22.1	Provide the model(s) used to calculate the long run marginal cost estimates in CitiPower's proposed tariff structure statement provided in accordance with the requirements of clauses 6.18.1A(a)(5) and 6.18.5(f) of the NER			CP ATT025 - ENEA - Long run marginal cost report - Mar2019 - Public	

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
22.2	Provide and describe the methodology and assumptions used to prepare the long run marginal cost estimates in paragraph 22.1			CP APP05 - Tariff structure statement reasons - Jan2020 - Public CP ATT025 - ENEA - Long run marginal cost report - Mar2019 - Public	
22.3	Describe the relationship between the expenditure, demand and other inputs (as appropriate) used in the model provided under paragraph 22.1 and the expenditure, demand and other forecasts (as appropriate) provided as part of the building block proposal for the forthcoming regulatory control period				Long run marginal cost was calculated prior to the development of demand and expenditure forecasts for the building block proposal and therefore may not fully align
23	RATE OF RETURN				
23.1	For the purposes of assessing CitiPower's proposal we require it to provide nominate 'placeholder' averaging periods which will be made public and have been used to calculate an indicative rate of return in Victorian Distribution's regulatory proposal.	CitiPower - Regulatory proposal - Chapter 10 - Revenue			
REGULATORY ASSET BASE AND TAX REPORTING					
24	REGULATORY ASSET BASE				
24.1	Provide CitiPower's calculation of the regulatory asset base for the relevant distribution system in respect of standard control services for each regulatory year of current regulatory control period using the AER's roll forward model, which is to be submitted as part of the regulatory proposal			CP MOD 10.01 - RFM 5.5 year 2016-21 - Jan2020 - Public	
24.2	Provide details of each departure from the underlying methods in the AER's roll forward model for the calculation referred to in paragraph 24.1 and the reasons for that departure.				Not applicable
24.3	If the value of the regulatory asset base as at the start of the forthcoming regulatory control period is proposed to be adjusted because of changes to asset service classification, provide details including relevant supporting information used to calculate that adjustment value				Not applicable
24.4	Provide details of any departure in the allocation of actual capex, asset disposal and customer contribution values across asset classes in the roll forward model from those reported in the Annual Reporting RIN for the relevant regulatory years and the reasons for that departure				Not applicable
25	DEPRECIATION SCHEDULES				
25.1	Provide CitiPower's calculation of the depreciation amounts for the relevant distribution system in respect of standard control services for each regulatory year of:				
(a)	the current regulatory control period using the AER's roll forward model, which is to be submitted as part of the regulatory proposal			CP MOD 10.01 - RFM 5.5 year 2016-21 - Jan2020 - Public	
(b)	the forthcoming regulatory control period using the AER's post-tax revenue model, which is to be submitted as part of the regulatory proposal			CP MOD 10.02 - PTRM 2021-26 - Jan2020 - Public	
25.2	Provide details of any departure from the underlying methods in the AER's roll forward model and post-tax revenue model for the calculations referred to in paragraph 25.1 and the reasons for that departure				Not applicable

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
25.3	Identify any changes to standard asset lives for existing asset classes from the previous determination. Explain the reason(s) for each change and provide supporting information				We have equalised the standard asset life for equity raising costs to reduce the complexity of depreciation calculations. Equity raising assets comprise less than 1% of the regulatory asset base
25.4	Identify any changes to new asset classes from the previous determination. Explain the reason(s) for using these new asset classes and provide supporting information on their proposed standard asset lives				Not applicable
25.5	If any existing asset classes from the previous determination are proposed to be removed and their residual values to be reallocated to other asset classes, explain the reason(s) for the change and provide supporting information. This should include a demonstration of the materiality of the change on the forecast depreciation allowance				Not applicable
25.6	Describe the method used to depreciate existing asset classes as at 1 July 2021 (the start of the forthcoming regulatory control period) and provide supporting calculations, if the approach differs from that in the roll forward model	CitiPower - Regulatory proposal - Chapter 10 - Revenue		CP MOD 10.07 - Accelerated depreciation - Jan 2020 - Pub	Certain assets have been separated out for accelerated de
26	CORPORATE TAX ALLOWANCE				
26.1	Provide CitiPower's calculation of the estimated cost of corporate income tax for the forthcoming regulatory control period using the AER's post-tax revenue model, which is to be submitted as part of the regulatory proposal			CP MOD 10.02 - PTRM 2021-26 - Jan2020 - Public	
26.2	Provide details of each departure from the AER's post-tax revenue model for the calculations referred to in paragraph 26.1 and the reasons for that departure				Not applicable
26.3	Identify each change to standard tax asset lives for existing asset classes from the previous determination. Explain the reason(s) for the change and provide relevant supporting information, including Federal tax laws governing depreciation for tax purposes				Not applicable
26.4	Describe the method used to depreciate existing asset classes as at 1 July 2021 (the start of the forthcoming regulatory control period) for tax purposes and provide supporting calculations, if the approach differs from that in the roll forward model				Not applicable
26.5	Provide CitiPower's calculation of the tax asset base for the relevant system in respect of standard control services for each regulatory year of the current regulatory control period using the AER's roll forward model, which is to be submitted as part of the regulatory proposal			CP MOD 10.01 - RFM 5.5 year 2016-21 - Jan2020 - Public	
26.6	Provide details of each departure from the underlying methods in the AER's roll forward model for the calculation referred to in paragraph 26.5 and the reasons for that departure				Not applicable
26.7	Identify each difference in the capitalisation of expenditure for regulatory accounting purposes and tax accounting purposes. Provide reasons and supporting calculations to reconcile any differences between the two forms of accounts.				Not applicable

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
26.8	Please provide the following information regarding immediate expensing capital expenditure for standard control services:				
26.8 (a)	In Workbook 2 – New CY historical, regulatory template 8.2, table 8.2.7, provide the amount of CitiPower’s immediate expensing capital expenditure by asset class incurred within the relevant regulatory years. This capex should be consistent with the value of immediate expensing capital expenditure that has or would be included, or forecast to be included, in the income tax returns lodged by CitiPower, whether Federal or NTER, for the relevant regulatory years. These reported values should reflect the values arising as a result of the ATO’s decision-making process where relevant.				Noted
26.8 (b)	CitiPower is to list in Workbook 2 – New CY historical, regulatory template 8.2, table 8.2.7 each asset class specified in its current determination as listed in the AER’s final decision in its post-tax revenue model and enter the immediate expensing capital expenditure information against each asset class. Further to this, where there is no actual immediate expensing capital expenditure for a specific asset class for the relevant regulatory year, input the value “0”.				Noted
26.8 (c)	List and explain the types of capex (such as refurbishment capex and capitalised overheads) associated with the immediate expensing capital expenditure as reported in Workbook 2 – New CY historical, regulatory template 8.2, table 8.2.7, if any.				Asset replacements and overheads
26.8 (d)	Explain the approach CitiPower used to forecast its immediate expensing capital expenditure for the period commencing on 1 January 2021 to 30 June 2021 and the 2022–26 regulatory control period as provided in the proposed post-tax revenue models.	CitiPower - Regulatory proposal - Chapter 10 - Revenue			
26.8 (e)	State if CitiPower intends to change its tax policy on immediate expensing capital expenditure from its current policy.				No
26.9	The PTRM (version 4) applies the diminishing value (DV) method for tax depreciation purposes to all new depreciable assets except for certain assets. Where CitiPower proposes capex associated with buildings and in-house software to be exempted from the DV method of tax depreciation, confirm that the proposal satisfies the following requirements:				
26.9 (a)	Buildings: <i>Capex</i> for buildings may be depreciated using the SL method if it satisfies the definition of a capital work under section 43.20 of the <i>Income Tax Assessment Act 1997</i> (ITAA).				Not applicable
26.9 (b)	(a) In-house software: Capex for in-house software may be depreciated using the SL method if it satisfies the definition of in-house software under section 995.1 of the ITAA, and may be depreciated using the SL method, consistent with section 40.72 of the ITAA.				Noted

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
27	TRANSITIONAL PERIOD				
27.1	Provide the information required under paragraphs 24-26 in RFM/s and PTRM/s which meet the AER's modelling requirements for the transitional period.			CP MOD 10.08 - RFM 2016-20 - Jan2020 - Public CP MOD 10.09 - PTRM 2021HY - Jan2020 - Public CP MOD 10.10 - Depreciation 2021HY - Jan2020 Public CP MOD 11.05 - Metering RFM 2016-20 - Jan2020 - Public CP MOD 11.06 - Metering PTRM & exit fees 2021HY - Jan2020 - Public	
MISCELLANEOUS REPORTING					
28	RELATED PARTY TRANSACTIONS				
28.1	Identify and describe all entities which:				
(a)	are a related party to CitiPower and contribute to the provision of distribution services; or			CP ATT101 - Related parties - Jan2020 - Public	
(b)	have the capacity to determine the outcome of decisions about CitiPower's financial and operating policies			CP ATT101 - Related parties - Jan2020 - Public	
28.2	Provide a diagram of the organisational structure depicting the relationships between all the entities identified in the response to paragraph 27.1			CP ATT101 - Related parties - Jan2020 - Public	
28.3	Identify:				
(a)	all arrangements or contracts between CitiPower and any of the other entities identified in the response to paragraph 27.1 currently in place or expected to be in place during the forthcoming regulatory control period which relate directly or indirectly to the provision of distribution services; and			CP ATT101 - Related parties - Jan2020 - Public	
(b)	the service or services that are the subject of each arrangement or contract			CP ATT101 - Related parties - Jan2020 - Public	
28.4	For each service identified in the response to paragraph 27.3(b):			CP ATT101 - Related parties - Jan2020 - Public	
(a)	provide:				
(i)	a description of the process used to procure the service; and			CP ATT101 - Related parties - Jan2020 - Public	
(ii)	supporting documentation including, but not limited to, requests for tender, tender submissions, internal committee papers evaluating the tenders, contracts between CitiPower and the relevant provider			CP ATT132 - Cost sharing agreement 2017 - Dec2019 - Confidential CP ATT128 - DRMF Constitution - Dec2004 - Confidential CP ATT129 - Network services agreement - Dec2019 - Confidential CP ATT130 - Resources Agreement 2017 (CP to CHED) - Dec2019 - Confidential CP ATT131 - Resources Agreement 2017 (CP to PNS) - Dec2019 - Confidential CP ATT126 - Corporate Services Agreement 2017 - Dec2019 - Confidential CP ATT127 - Corporate Services Agreement 2017 signed - Dec2019 - Confidential	
(b)	explain:				
(i)	why that service is the subject of an arrangement or contract (i.e. why it is outsourced) instead of being undertaken by CitiPower itself;			CP ATT101 - Related parties - Jan2020 - Public	
(ii)	whether the services procured were provided under a standalone contract or provided as part of a broader operational agreement (or similar);			CP ATT101 - Related parties - Jan2020 - Public	
(iii)	whether the services were procured on a genuinely competitive basis and if not, why not; and			CP ATT101 - Related parties - Jan2020 - Public	
(iv)	whether the service (or any component thereof) was further outsourced to another provider by the related party.			CP ATT101 - Related parties - Jan2020 - Public	
29	VEGETATION MANAGEMENT COMPLIANCE				

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
29.1	Provide compliance audits of vegetation management work conducted by CitiPower during the current regulatory control period			CP ATT015 - ESV - 2019 safety performance - Oct2019 - Public CP ATT016 - ESV - 2018 safety performance - Oct2018 - Public CP ATT017 - ESV - 2017 safety performance - Oct2017 - Public CP ATT018 - ESV - 2016 safety performance - Sep2016 - Public	
30	CORPORATE STRUCTURE				
30.1	Provide charts that set out:				
(a)	the group corporate structure of which CitiPower is a part; and			CP ATT101 - Related parties - Jan2020 - Public	
(b)	the organisational structure of CitiPower			CP ATT101 - Related parties - Jan2020 - Public	
31	FORECAST MAP OF DISTRIBUTION SYSTEM				
31.1	Provide a forecast map of CitiPower's distribution system for the forthcoming regulatory control period. This map, together with any appropriate accompanying notes, should also indicate the location of new major network assets proposed to be constructed over the forthcoming regulatory control period			CP RIN017 - Map of distribution system - Jan2020 - Public	
32	TRANSITIONAL ISSUES				
32.1	Provide information on transitional issues (expressly identified in the NER or otherwise) which CitiPower expects will have a material impact on it and should be considered by the AER in making its distribution determination. For each issue, set out the following information:				
(a)	the transitional issue;				There are no transitional issues
(b)	what has caused the transitional issue;				Not applicable
(c)	how the transitional issue impacts on CitiPower; and				Not applicable
(d)	how CitiPower considers the transitional issue could be addressed				Not applicable
ASSURANCE REQUIREMENTS					
33	AUDIT OPINION REPORTS AND REVIEW CONCLUSION STATEMENTS				
33.1	Provide the audit opinion report and review conclusion statements as applicable, prepared in accordance with the requirements set out in Appendix C			CP RIN011 - Deloitte - Audit opinion - Jan2020 - Public	
33.2	Provide all reports from the auditor to CitiPower's management regarding the review conclusion statements and/or auditors' opinions report or assessment.			CP RIN011 - Deloitte - Audit opinion - Jan2020 - Public	
OTHER INFORMATION					
34	CONFIDENTIAL INFORMATION				
34.1	This clause applies to any information CitiPower provides:				
(a)	in response to Schedule 1;				Noted
(b)	in a regulatory proposal for the forthcoming regulatory control period (a Proposal)				Noted
(c)	in a revision or amendment to a Proposal; and				Noted
(d)	in a submission CitiPower makes regarding a Proposal or a revised or amended Proposal; (together, CitiPower's Information)				Noted
34.2	If CitiPower wishes to make a claim for confidentiality over any of CitiPower's information, at the same time as making the claim it must, provide the details of that claim in accordance with the requirements of the AER's Confidentiality Guideline, as if it extended and applied to that claim for confidentiality			CP RIN 012 - Confidentiality claim - Jan2020 - Public	Noted
35	COMPLIANCE WITH SECTION 71YA OF THE NEL				

RIN Section	Requirement	Regulatory Proposal reference	RIN template reference	Supporting documentation reference	Comments
35.1	Where any expenditure or cost has been incurred or is forecast to be incurred by CitiPower, as a result of or incidental to a review under Division 3A – Merits review and other non-judicial review – of the NEL, CitiPower must identify the expenditure or cost and provide a statement attesting that:				
(a)	CitiPower has not included any of that expenditure or cost, or any part of that expenditure or cost, in its capital or operating expenditures for a network revenue or pricing determination; and				We have not included any expenditure for costs incurred, or forecast to occur, as a result of, or incidental to, a review under Division 3A – Merits review and other non-judicial review.
(b)	CitiPower has not recovered any of that expenditure or cost, or any part of that expenditure or cost, from end users; and				We have not recovered any costs incurred, or forecast to occur, as a result of, or incidental to, a review under Division 3A – Merits review and other non-judicial review.
(c)	CitiPower has not sought to pass through any of that expenditure or cost, or any part of that expenditure or cost, to end users; or				We have not sought to pass through any costs incurred, or forecast to occur, as a result of, or incidental to, a review under Division 3A – Merits review and other non-judicial review.
35.2	Where no expenditure or cost has been incurred or is forecast to be incurred by CitiPower, as a result of or incidental to a review under Division 3A – Merits review and other non-judicial review – of the NEL, CitiPower must provide a statement attesting that:				
(i)	No such expenditure or cost has been incurred or is forecast to be incurred				We have not included any expenditure for costs incurred, or forecast to occur, as a result of, or incidental to, a review under Division 3A – Merits review and other non-judicial review.