

**ERGON ENERGY**



# **Reset Regulatory Information Notice**

Final Submission  
1 July 2015 to 30 June 2020

31 October 2014

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## 1. INTRODUCTION

On 25 August 2014, the Australian Energy Regulator (AER) issued a Regulatory Information Notice (Notice) under Division 4 of Part 3 of the *National Electricity (South Australia) Law (Qld)* (NEL) to Ergon Energy Corporation Ltd (ABN 50 087 646 062) (Ergon Energy).

The Notice sets out information that Ergon Energy must provide, prepare and maintain in order for the AER to make a distribution determination for the regulatory control period commencing on 1 July 2015 and ending on 30 June 2020.

The AER requires Ergon Energy to:

- provide the information specified in Schedule 1 to the Notice, audited in accordance with Appendix C to the Notice, in accordance with section 28M(e) of the NEL;
- verify, using the statutory declaration in Appendix B to the Notice, the information specified in the Notice, in accordance with section 28M(d) of the NEL; and
- deliver the said information and the accompanying Audit report and Review Report(s) electronically to [AERInquiry@aer.gov.au](mailto:AERInquiry@aer.gov.au), on or before 5 pm Australian Eastern Standard Time on 31 October 2014.

Pursuant to section 28K(1)(c) of the NEL, the AER requires the information specified in the Notice to be provided, and to be prepared and maintained in the manner and form specified, for the reasons set out in Appendix D to the Notice.

Accordingly, Ergon Energy submits this Reset Regulatory Information Notice Final Submission (audited) in relation to the regulatory control period 2015-20 (2015 - 2020 Reset RIN Final Submission), as made by:

Ergon Energy Corporation Limited  
PO Box 1090  
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## 2. CONFIDENTIAL INFORMATION

*Schedule 1, paragraph 35*

### 2.1 Requirement

In accordance with Schedule 1, paragraph 35 of the Notice, if Ergon Energy makes a claim for confidentiality over any information provided in accordance with the Notice issued, Ergon Energy must:

- provide any details of a claim for confidentiality in accordance with the requirements of the AER's Distribution Confidentiality Guideline, as if it extended and applied to that claim for confidentiality;
- provide any details of a claim for confidentiality in response to the above, at the same time as making the claim for confidentiality; and
- confirm, in writing, that consent is given for the AER to disclose all other of Ergon Energy's information (provided in the submission) on the AER website.

This requirement applies to any information Ergon Energy provides:

- in response to Schedule 1;
- in a regulatory proposal, revenue proposal, proposed negotiating framework, proposed pricing methodology, access arrangement proposal or access arrangement for the forthcoming regulatory control period (a Proposal);
- in a revision or amendment to a Proposal; and
- in a submission Ergon Energy makes regarding a Proposal or a revised or amended Proposal; (together, Ergon Energy's Information).

The AER's *Confidentiality Guideline 2013* sets out the framework for how the AER will handle confidentiality claims and requirements for Ergon Energy.

A confidentiality claim, by itself, is insufficient to prevent disclosure. Both the NEL and the *Competition and Consumer Act 2010* (Cth) provide for the AER to disclose confidential information in certain circumstances. In particular, section 28ZB of the NEL allows the AER to disclose information where:

- disclosure would not cause detriment to the information provider or the person from whom the information provider received the information; or
- public benefit in disclosing the information outweighs that detriment.

### 2.2 Response

Ergon Energy has complied with the requirements outlined above and the AER's *Confidentiality Guideline, 2013* in assessing confidentiality claims in preparation of its 2015 – 2020 Reset RIN Final Submission. Ergon Energy's claims for confidentiality are identified in the response to Schedule 1, paragraph 35 and are provided as attachments to this 2015 – 2020 Reset RIN Final Submission as EECL RESET RIN Schedule 1 Response – Confidential version.

Refer to Table 9-1: List of Attachments.

## 2. CONFIDENTIAL INFORMATION

Ergon Energy consents to the AER disclosing all information provided in Ergon Energy's 2015 – 2020 Reset RIN Final Submission not subject to a confidentiality claim, on the AER website.

It should be noted that Ergon Energy contacted its independent auditors - the Queensland Audit Office (QAO) and Parsons Brinckerhoff (PB), to advise on the AER's ability to disclose audit or review reports issued to Ergon Energy in respect of its 2015-20 Reset RIN, subject to any confidentiality claims made. Confirmation was obtained from the auditors agreeing to the release of audit or review reports / audit opinions.

## 3. REGULATORY TEMPLATES

*Schedule 1, paragraph 1.1-1.3; Schedule 2, paragraphs 1.1 and 1.3; Appendix E: Principles and Requirements*

### 3.1 Requirement

Schedule 1, paragraph 1.1 of the Notice requires Ergon Energy to provide the information required in each Regulatory Template in the Microsoft Excel workbooks attached at Appendix A to the Notice (the Regulatory Templates), completed in accordance with:

- the Notice;
- the instructions in the Microsoft Excel workbooks attached at Appendix A;
- the Principles and Requirements in Appendix E; and
- the service classifications set out in the framework and approach paper (this requirement does not relate to Ergon Energy's regulatory asset base values in the current regulatory control period or the previous regulatory control period).

Schedule 2, paragraph 1.1 requires the Microsoft Excel workbooks to be prepared in a manner and form specified in the worksheets therein and reiterates that the requirements of the Notice are to be adhered to.

Appendix E to the Notice sets out the Principles and Requirements for completing the Regulatory Templates.

- Paragraph 1.1 provides that in responding to the Notice, Ergon Energy must for the Previous Regulatory Control Period, the Current Regulatory Control Period and for Forecast Information, allocate costs in accordance with Ergon Energy's Applicable Cost Allocation Method (CAM).
- Paragraph 1.2 provides that in responding to the Notice, Ergon Energy must apply the classification of services in the framework and approach paper for the Previous Regulatory Control Period, the Current Regulatory Control Period and for Forecast Information.
- It is noted that paragraphs 1.1 and 1.2 do not relate to the value of Ergon Energy's regulatory asset base prior to 1 July 2015.

Paragraph 1.3 notes that, subject to a limited number of stated exceptions, Ergon Energy must provide all information required in the Regulatory Templates. That is to say, Ergon Energy must complete all input cells, meaning a value must be entered that corresponds to the unit required. For the avoidance of doubt, "N/A" or similar must not be input.

The exceptions referred to in paragraph 1.3 are identified in the Regulatory Templates with orange coloured cells. Ergon Energy may only be exempted from inserting data into these cells and must instead colour them black if Ergon Energy does not currently collect or report this information and identifies this in its Basis of Preparation document.

Data for cells in Regulatory Templates coloured grey or containing formulae do not require input and must not be amended by Ergon Energy.

Paragraph 1.6 requires that when Ergon Energy must make an estimate because it cannot populate the input cell with actual information, Ergon Energy must demonstrate that it has provided the best estimate it can. In its Basis of Preparation document, Ergon Energy must explain:

- why it could not use actual information;
- how Ergon Energy derived the estimate; and
- why it is Ergon Energy's best estimate.

## 3.2 Response

### Completed Regulatory Templates

Ergon Energy's completed Regulatory Templates, being the Microsoft Excel workbooks at Appendix A to the Notice, are provided as attachments to this 2015 – 2020 Reset RIN Final Submission as follows:

- QLD – RESET RIN 2015-20 – Actual Information;
- QLD – RESET RIN 2015-20 – Estimated Information;
- QLD – RESET RIN 2015-20 – Consolidated Information;
- QLD – RESET RIN 2015-20 – Actual Information – Confidential version;
- QLD – RESET RIN 2015-20 – Estimated Information – Confidential version;
- QLD – RESET RIN 2015-20 – Consolidated Information – Confidential version;
- QLD – RESET RIN 2015-20 – Ergon Disposals – Actual Information;
- QLD – RESET RIN 2015-20 – Ergon Disposals – Estimated Information; and
- QLD – RESET RIN 2015-20 – Ergon Disposals – Consolidated Information.

Refer to Table 9-1: List of Attachments.

On 21 August 2014, the AER advised, in response to the issues raised by Energex and Ergon Energy, that because of duplicate information requirements and to minimise regulatory burden, the AER does not require Energex and Ergon Energy to provide the 2013-14 Category Analysis (CA) RIN that had been scheduled for return to the AER on 31 October 2014. The AER will consider compliance with the Reset RIN in relation to CA information as compliance with the CA RIN for the 2013-14 regulatory year.

Following release of the final Reset RIN by the AER on 25 August 2014, Ergon Energy identified a number of errors and issues with the Regulatory Templates. These related mainly to:

- Errors or limitations in the templates, which prevented Ergon Energy from entering the data as required. The AER amended and re-issued the templates on several occasions to address the majority of these issues, however in some instances the AER has agreed alternatives solutions with Ergon Energy;
- Inconsistencies in the data requirements in some templates; and
- Specific forecast data that Ergon Energy is unable to provide for sound reasons, which the AER has subsequently agreed is not required to be provided.



### 3. REGULATORY TEMPLATES

The table below identifies all agreed amendments, clarifications or departures from the Regulatory Templates as agreed with the AER, including the date of agreement. Some of these relate to changes agreed with the AER during the 2013-14 CA or Economic Benchmarking (EB) RIN processes. The changes have been reflected across the Consolidated, Actual and Estimated Reset RIN Regulatory Templates as required.

**Table 3-1: Amendments to Regulatory Templates**

Regulatory template	Relevant table/s	AER agreed amendment / clarification	Date of AER advice
2.1 Expenditure summary	Table 2.1.2 Table 2.1.4	<ul style="list-style-type: none"> <li>Cell H69 sums incorrectly. However, this is not a material issue as the AER's database will not pick up information from the summing cells in this template.</li> <li>Cell C106 "Capitalised network overhead" should read as "Network overhead"</li> <li>Cell C107 "Capitalised corporate overhead" should read as "Corporate overhead".</li> </ul>	30 September 2014
2.3 Augex	Table 2.3.3.2 Table 2.3.4	<ul style="list-style-type: none"> <li>The 2013-14 data in tables 2.3.4 and 2.3.3.2 should be in \$ nominal.</li> <li>Each following year should be in \$ real June 2015.</li> </ul>	22 September 2014
2.4 Augex model	Table 2.4.5 Table 2.4.6	<ul style="list-style-type: none"> <li>Average unit costs in columns F and J of table 2.4.5 should be provided in \$000's real June 2015.</li> <li>The currency denomination in table 2.4.6 should consistently be thousands (\$000's) across all sections of the table.</li> </ul>	29 and 30 September 2014
2.15 Insurance & self-insurance	Table 2.15.4	<ul style="list-style-type: none"> <li>Forecast data in template 2.15.4 should be provided in "\$000's, real June 2015" as set out in the column header "Proposed self-insurance allowance".</li> </ul>	1 October 2014
3.3 Assets (RAB)	All tables	<ul style="list-style-type: none"> <li>All RAB forecast data should please be provided in \$nominal.</li> </ul>	24 September 2014
3.4 Operational data	Table 3.4.1	<ul style="list-style-type: none"> <li>Where Ergon Energy does not charge for energy delivery on a peak, off-peak or shoulder basis then zeros should be entered</li> </ul>	28 April 2014

### 3. REGULATORY TEMPLATES

Regulatory template	Relevant table/s	AER agreed amendment / clarification	Date of AER advice
		<p>against these variables.</p> <ul style="list-style-type: none"> <li>If Ergon is not billed for energy it receives on a peak, off peak or shoulder basis then zeros should also be entered against these variables.</li> </ul>	
3.4 Operational data	Table 3.4.3 Table 3.6.4	<ul style="list-style-type: none"> <li>Ergon Energy is not required to provide forecast data for: <ul style="list-style-type: none"> <li>DOPSD0101 - Non-coincident Summated Raw System Annual Maximum Demand</li> <li>DOPSD0104 - Coincident Raw System Annual Maximum Demand</li> <li>DOPSD0107 - Non-coincident Summated Raw System Annual Maximum Demand</li> <li>DOPSD0110 - Coincident Raw System Annual Maximum Demand</li> <li>DOPSD0201 - Non-coincident Summated Raw System Annual Maximum Demand</li> <li>DOPSD0204 - Coincident Raw System Annual Maximum Demand</li> <li>DOPSD0207 - Non-coincident Summated Raw System Annual Maximum Demand</li> <li>DOPSD0210 - Coincident Raw System Annual Maximum Demand</li> </ul> </li> <li>In table 3.6.4, Overall utilisation should be calculated using 50% POE max demand forecasts.</li> </ul>	19 September 2014
4.3 Fee based services 4.4 Quoted services	Table 4.3.1 Table 4.4.1	<ul style="list-style-type: none"> <li>For historical data, Ergon Energy should list the fee-based and quoted services that were listed in the annual tariff proposal for each relevant year, in accordance with Appendix E,</li> </ul>	10 October 2014

### 3. REGULATORY TEMPLATES

Regulatory template	Relevant table/s	AER agreed amendment / clarification	Date of AER advice
		<p>paragraph 18.2 i.e. Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.</p> <ul style="list-style-type: none"> <li>Ergon Energy is not required to provide forecast volumes and expenditures for each listed fee-based and quoted service.</li> </ul>	
5.3 MD – Network level	Table 5.3.1	<ul style="list-style-type: none"> <li>Blacking out the orange cells is not available and is therefore not required.</li> </ul>	16 September 2014
6.2 Reliability & customer service	Table 6.2.1 Table 6.2.2	<ul style="list-style-type: none"> <li>The cells shaded light grey (proposed targets) are optional. The 2014-15 year is also optional.</li> </ul>	19 September 2014
7.7 Services, indicative prices	All tables	<ul style="list-style-type: none"> <li>Ergon Energy may use the unlocked version of template 7.7 to add additional rows as required.</li> <li>The completed unlocked version of template 7.7 should be attached to the locked set of templates as an additional sheet.</li> <li>The locked version of template 7.7 can be left empty.</li> <li>The audit assurance requirements will apply to the unlocked template 7.7.</li> </ul>	2 October 2014

#### Cost Allocation Method (CAM)

In responding to the Notice, Ergon Energy must for the Previous Regulatory Control Period, the Current Regulatory Control Period and for Forecast Information, allocate costs in accordance with Ergon Energy's Applicable CAM.

The changes to the Ergon Energy's CAM, approved by the AER on 15 August 2014, were minimal and at a high level only. Following analysis of the impact of the changes on the historical information, Ergon Energy determined that the historical data is not materially altered by the changes and therefore, recasting of the historical data has not been undertaken. The historical data represented in the Regulatory Templates

### 3. REGULATORY TEMPLATES

materially reflects the application of the approved Applicable CAM applicable in the next regulatory control period.

Refer to Table 9-2: Basis of Preparation.

#### Classification of Services

In responding to the Notice, and subject to the AER's agreed amendments outlined in Table 3.1 above, Ergon Energy has applied the classification of services in the framework and approach paper for the Previous Regulatory Control Period, the Current Regulatory Control Period and for Forecast Information.

The table below outlines the approach Ergon Energy has taken to re-cast the historical data, where necessary, to apply the classification of services in the framework and approach.

**Table 3-2: Application of classification of services to historical data**

Service	Current classification	Proposed AER classification for 2015-20	Approach to re-casting
Carrying out planning studies and analysis relating to connection applications	Standard Control / Alternative Control	Alternative Control	New quoted service for the regulatory control period 2015-20. On 10 October 2014, the AER agreed that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.
Feasibility and concept scoping, including planning and design, for large customer connections	Standard Control / Alternative Control	Alternative Control	New quoted service for the regulatory control period 2015-20. On 10 October 2014, the AER agreed that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.
Tender process	Not currently classified	Alternative Control	New quoted service for the regulatory control period 2015-20. On 10 October 2014, the AER agreed that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.

### 3. REGULATORY TEMPLATES

Service	Current classification	Proposed AER classification for 2015-20	Approach to re-casting
Protection and Power Quality assessment – prior to connection and after connection	Standard Control / Alternative Control	Alternative Control	<p>New fee-based and quoted service for the regulatory control period 2015-20.</p> <p>On 10 October 2014, the AER agreed that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.</p>
Customer build, own and operate consultation services	Not currently classified	Alternative Control	<p>New quoted service for the regulatory control period 2015-20.</p> <p>On 10 October 2014, the AER agreed that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.</p>
Commissioning and energisation of large customer connections	Standard Control	Alternative Control	<p>New quoted service for the regulatory control period 2015-20.</p> <p>The historical connections expenditure in Regulatory Template 2.1, Expenditure summary has been recast to reflect the reclassification of this service from Standard Control to Alternative Control and documented in the associated Basis of Preparation document.</p> <p>On 10 October 2014, the AER agreed that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.</p>
Real estate development connection	Standard Control	Alternative Control	<p>New quoted service for the regulatory control period 2015-20.</p> <p>The historical connections expenditure in Regulatory Template 2.1, Expenditure summary has been recast to reflect the reclassification of this service from</p>

### 3. REGULATORY TEMPLATES

Service	Current classification	Proposed AER classification for 2015-20	Approach to re-casting
			<p>Standard Control to Alternative Control and documented in the associated Basis of Preparation document.</p> <p>On 10 October 2014, the AER agreed that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.</p>
Removal of network constraint for embedded generator	Standard Control	Alternative Control	<p>New quoted service for the regulatory control period 2015-20.</p> <p>The historical connections expenditure in Template 2.1, Expenditure summary has been recast to reflect the reclassification of this service from Standard Control to Alternative Control and documented in the associated Basis of Preparation document.</p> <p>On 10 October 2014, the AER agreed that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.</p>
Accreditation of alternative service providers and approval of their designs, works and materials	Standard Control/ Alternative Control	Alternative Control	<p>New fee-based and quoted service for the regulatory control period 2015-20.</p> <p>On 10 October 2014, the AER agreed that for Regulatory Template 4.3 Fee-based and regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.</p>
Type 5 and 6 metering installation, provision, maintenance, reading and data services	Standard Control	Alternative Control	<p>The metering expenditure in Regulatory Template 2.1 Expenditure summary and Regulatory Template 4.2 Metering have been recast to reflect the reclassification of this service from Standard Control to</p>

### 3. REGULATORY TEMPLATES

Service	Current classification	Proposed AER classification for 2015-20	Approach to re-casting
			<p>Alternative Control and documented in the associated Basis of Preparation documents.</p> <p>On 10 October 2014, the AER agreed that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.</p>
Auxiliary metering services	Not currently classified / Standard Control/ Alternative Control	Alternative Control	<p>New quoted service for the regulatory control period 2015-20.</p> <p>On 10 October 2014, the AER agreed that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.</p>
Services provided in relation to a Retailer of Last Resort (ROLR) event	Standard Control	Alternative Control	A ROLR event occurred on 2009, however the event had no material impact on Ergon Energy and therefore, no re-casting of the historical expenditure is required.
Customer requests provision of electricity network data requiring customised investigation, analysis or technical input	Standard Control	Alternative Control	<p>New quoted service for the regulatory control period 2015-20.</p> <p>The AER agreed on 10 October 2014 that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.</p>
Witness testing	Not currently classified	Alternative Control	<p>New quoted service for the regulatory control period 2015-20.</p> <p>The AER agreed on 10 October 2014 that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and</p>

### 3. REGULATORY TEMPLATES

Service	Current classification	Proposed AER classification for 2015-20	Approach to re-casting
			volumes to apply the classification of services in the framework and approach paper.
Emerging public lighting technology	Not currently classified	Alternative Control	This service was not classified in the current regulatory control period and there has been no expenditure on emerging public lighting technology, therefore no re-casting of historical expenditure is required.
Emergency recoverable works	Alternative Control	Unclassified	The AER agreed on 10 October 2014 that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.
High load escorts	Alternative Control/ unclassified	Unclassified	The AER agreed on 10 October 2014 that for Regulatory Template 4.3 Fee-based and Regulatory Template 4.4 Quoted services, Ergon Energy is not required to re-cast the historical expenditure and volumes to apply the classification of services in the framework and approach paper.

#### Forecast Data Clarifications

In response to the AER's Notice, Ergon Energy is required to supply Forecast Information within the Regulatory Templates. Ergon Energy is not required to produce Basis of Preparation documents for this information; however there are certain sections where Ergon Energy wishes to clarify the figures presented in the Regulatory Templates to ensure transparency and avoid the potential for confusion.

**Table 3-3: Forecast data clarifications**

Regulatory Template	Ergon Energy Clarification
2.1 Expenditure Summary	<p>The AER has specified that the forecast expenditure in Template 2.1 is required to reconcile to the ex-ante capital and operating allowances in the Post-Tax Revenue Model. This requirement has been addressed in the response to Schedule 1, section 1.5. Due to specific reporting requirements in other Templates (Templates 2.2 – 2.10 and 4.1 – 4.4) some figures will not equal those stated in the Expenditure Summary Template 2.1. An explanation for each figure has been given below:</p> <ul style="list-style-type: none"> <li>▪ Template 2.3 – Augex</li> </ul>



Regulatory Template	Ergon Energy Clarification
	<p>The data stated in the 2013-14 year in the Augex template is required to be stated in “Real June 2015” dollars. The figures stated in the Expenditure Summary however are to be reported in “Actual” dollars.</p> <ul style="list-style-type: none"> <li>▪ Template 2.5 – Connections The forecasts contained in the Connections Template 2.5 exclude all Large Customer Connections, Capital Contributions and Gifted Assets. The figures stated in the Expenditure Summary Template 2.1 will however include these figures.</li> <li>▪ Template 4.1 – Public Lighting The forecasts contained in the Public Lighting Template 4.1 exclude all Gifted Assets. The figures stated in the Expenditure Summary Template 2.1 will however include these figures.</li> </ul>
2.12 Input Tables	<p>The Input Tables Template 2.12 has been produced with the same reconciliation requirements for the Expenditure Template 2.1 Expenditure Summary. As such, some figures stated in the Input Tables will not reconcile to those stated in Templates 2.2 – 2.10 and 4.1 – 4.4. Please see the Expenditure Summary explanation.</p>
2.16 Opex Summary	<p>The figures in Opex Summary Template 2.16 are required to equal those figures being supplied in the Ergon Energy Regulatory Proposal. It was identified by Ergon Energy that the line items available within the tables 2.16.1 and 2.16.2 were not sufficient to allow a complete reconciliation back to those figures being stated in the Regulatory Proposal. As such please note the following with respect to Regulatory Template 2.16, Tables 2.16.1 and 2.16.2:</p> <ul style="list-style-type: none"> <li>▪ Figures include Feed-in Tariff costs within the 2014-15 year;</li> <li>▪ Figures include Debt Raising costs for years 2015-16 to 2019-20; and</li> <li>▪ Non-network expenditure has been provided, however this would be a duplication of Overhead Costs and would be removed as a balancing item when reconciling back to the figures used in the Regulatory Proposal.</li> </ul>
3.1 Revenue	<p>The AER requires in Revenue Template 3.1 that <i>“Total revenues must equal the total forecast revenues proposed by Ergon Energy in its revenue proposal”</i> (p25 Schedule 1 of the Reset RIN dated 25 August 2014). As Ergon Energy has presented revenues in nominal dollars in its Revenue Proposal the figures in Revenue Template 3.1 have also been stated in nominal dollars for all years.</p>

#### Data Integrity

Ergon Energy's 2015-20 Reset RIN Final Submission was required to be prepared in a very limited timeframe from the date of issue of the final Reset RIN by the AER on 25 August 2014, particularly considering the inherently complex and onerous nature of the RIN requirements. In addition, the Regulatory Templates were required to be corrected and re-issued on several occasions by the AER and clarification was required to be sought from the AER on a range of matters, which delayed Ergon Energy's ability to complete its response.

Significant work was required to perform the necessary extraction, collation, analysis disaggregation, and where necessary, estimation of data in order to meet the detailed requirements set out in the Reset RIN. Furthermore, significant effort was required to document the Basis of Preparation employed by Ergon Energy to allow an auditor to form an opinion. This was particularly exacerbated given the complexity of data being requested and extensive cross dependence of financial and non-financial metrics.

Of note, where it has remained not possible to provide actual information in response to the Notice, Ergon Energy has provided estimated information and has used its best endeavours to produce the best estimate. The basis of estimate and reasons why they are the most appropriate estimates are outlined in Ergon Energy's Basis of Preparation documents (refer Section 4).

While Ergon Energy has used its best endeavours to determine estimated values, the inherent limitations of such estimated data vis-a-vis actual data should be recognised. It should also be noted that the availability of details and information regarding the AER's intended purposes and the importance of the underpinning assumptions will impact the usefulness of the data for the AER's purposes.

## 4. BASIS OF PREPARATION

*Schedule 1, paragraph 1.2; Schedule 2, paragraph 1.2; Appendix E: Principles and Requirements, paragraphs 3.1 – 3.6*

### 4.1 Requirement

Schedule 1, paragraph 1.2 of the Notice requires Ergon Energy to provide in accordance to the Notice and the Principles and Requirements in Appendix E, a Basis of Preparation demonstrating how Ergon Energy has complied with the Notice, in respect of:

- Information in each Regulatory Template in the Microsoft Excel Workbooks attached at Appendix A; and
- Any other information prepared in accordance with the requirements of the Notice.

Schedule 2, paragraphs 1.2(a)–(d) of the Notice requires Ergon Energy to prepare the Basis of Preparation in accordance with the requirements specified in Schedule 1. Specifically, the Basis of Preparation must:

- Demonstrate how the information provided is consistent with the requirements of the Notice;
- Explain the source from which Ergon Energy obtained the information provided; and
- Explain the methodology Ergon Energy applied to provide the required information, including any assumptions Ergon Energy made.

In circumstances where Ergon Energy cannot provide input for a Variable using Actual Information and therefore must provide input using Estimated Information, Ergon Energy must also comment as to:

- Why an estimate was required, including why it was not possible to use Actual Information; and
- The basis for the estimate, including the approach used, assumptions made and reasons why the estimate is a best estimate, given the information sought in the Notice.

Note, on 4 September 2014, the AER confirmed that Basis of Preparation documents are not required for forecast data across the Regulatory Templates.

### 4.2 Response

The requirements specified in the Notice, or otherwise agreed with the AER as identified in Table 3-1 above, have been addressed for each of the Regulatory Templates and explained in the Basis of Preparation documents prepared by Ergon Energy.

The Basis of Preparation documents are provided as attachments to this Final Submission. Refer to Table 9-1: List of Attachments.

Ergon Energy has provided in accordance to the Notice and the Principles and Requirements in Appendix E, basis or preparation documents demonstrating how Ergon Energy has complied with the Notice, in respect of:

- Information in each Regulatory Template in the Microsoft Excel Workbooks attached at Appendix A; and

## 4. BASIS OF PREPARATION

- Any other information prepared in accordance with the requirements of the Notice.

Specifically, the Basis of Preparation documents:

- Demonstrate how the information provided is consistent with the requirements of the Notice;
- Explain the source from which Ergon Energy obtained the information provided; and
- Explain the methodology Ergon Energy applied to provide the required information, including any assumptions Ergon Energy made.

In circumstances where Ergon Energy cannot provide input for a Variable using Actual Information and therefore must provide input using Estimated Information, Ergon Energy has commented as to:

- Why an estimate was required, including why it was not possible to use Actual Information; and
- The basis for the estimate, including the approach used, assumptions made and reasons why the estimate is a best estimate, given the information sought in the Notice.

Note, as many of the Regulatory Templates include and/or rely upon data that has been audited and reported in previous EB, CA or Annual Performance (AP) RINs, a number of the Reset RIN Basis of Preparation documents reference previous EB, CA or AP RIN Basis of Preparation documents. A full list of Basis of Preparation documents is provided in Table 9-1: Basis of Preparation.

### Additional Requirements

The additional requirements noted in Table 4-2 were identified in Appendix E: Principles and Requirements of the Notice, as being requirements that require the provision of additional information or attachments over and above the completed Regulatory Templates or Basis of Preparation documents.

Responses to these requirements are made as attachments to the Basis of Preparation for relevant Regulatory Templates as summarised in the table below.

**Table 4-2: Additional requirements**

Notice Reference	Requirement	Attachment
Appendix E, paragraph 1.10	Ergon Energy must provide a reconciliation between total capital and operating expenditure provided in the Regulatory Templates to the capital and operating expenditure recorded in Ergon Energy's Regulatory Accounting Statements and Audited Statutory Accounts.	Attachment to Basis of Preparation for Regulatory Template 2.1 Expenditure summary
Appendix E, paragraph 2.4	Ergon Energy must provide an excel spread sheet that contains the calculation of balancing items reported in Regulatory Template 2.1. At a minimum, this spread sheet must: <ul style="list-style-type: none"> <li>For each instance where an expenditure item is reported more than once (i.e. double counted), identify: <ul style="list-style-type: none"> <li>where that instance is reflected in expenditure included in the Regulatory Templates</li> <li>the value of that expenditure in each Regulatory Template.</li> </ul> </li> <li>Identify each instance where the Notice requires Ergon Energy to report capex not on an "as-incurred" basis in</li> </ul>	Attachment to Basis of Preparation for Regulatory Template 2.1 Expenditure summary

#### 4. BASIS OF PREPARATION

Notice Reference	Requirement	Attachment
	Regulatory Templates 2.2 to 2.10 and 4.1 to 4.4 and, for the relevant expenditure item, list its corresponding value when expressed on an “as incurred” basis.	

## 5. SCHEDULE 1

*Schedule 1, paragraphs 1 – 36*

### 5.1 Requirement

The AER requires Ergon Energy to provide the information contained in Schedule 1 of the Notice.

In addition to the requirement to provide the information required in each Regulatory Template in the Microsoft Excel workbooks attached at Appendix A to the Notice and associated Basis of Preparation documents, Schedule 1 requires Ergon Energy to provide a range of additional information requirements as specified in paragraphs 1 to 36 of the Notice:

1. PROVIDE INFORMATION
2. CLASSIFICATION OF SERVICES
3. CONTROL MECHANISMS
4. STEP CHANGES
5. CAPITAL EXPENDITURE
6. REPLACEMENT CAPITAL EXPENDITURE MODELLING
7. AUGMENTATION CAPITAL EXPENDITURE MODELLING
8. DEMAND AND CUSTOMER NUMBER FORECASTS
9. CONNECTIONS EXPENDITURE REQUIREMENTS
10. OPERATING AND MAINTENANCE EXPENDITURE
11. RISK MANAGEMENT AND INSURANCE
12. ALTERNATIVE CONTROL SERVICES
13. FEE BASED AND QUOTED ALTERNATIVE CONTROL SERVICES
14. METERING ALTERNATIVE CONTROL SERVICES
15. PUBLIC LIGHTING ALTERNATIVE CONTROL SERVICES
16. ECONOMIC BENCHMARKING
17. PROVISIONS
18. FORECAST PRICE CHANGES
19. RELATED PARTY TRANSACTION
20. PROPOSED CONTINGENT PROJECTS
21. NON-NETWORK ALTERNATIVES
22. EFFICIENCY BENEFIT SHARING SCHEME
23. SERVICE AND QUALITY
24. SHARED ASSETS

## 5. SCHEDULE 1

25. REVENUES AND PRICES FOR STANDARD CONTROL SERVICES
26. INDICATIVE IMPACT ON ANNUAL ELECTRICITY BILLS
27. REGULATORY ASSET BASE
28. DEPRECIATION SCHEDULES
29. CORPORATE TAX ALLOWANCE
30. CORPORATE STRUCTURE
31. FORECAST MAP OF DISTRIBUTION SYSTEM
32. AUDIT REPORTS
33. BOARD RESOLUTION
34. TRANSITIONAL ISSUES
35. CONFIDENTIAL INFORMATION
36. DISPOSALS

On 18 September 2014, the AER advised in relation to Schedule 1, paragraph 14, that revenue is not required to be re-cast to account for changed service classifications in relation to metering. As type 5 and 6 meters are Standard Control Services in the current regulatory control period, Ergon Energy should not report revenue for Alternative Control Services type 5 or 6 meters in the current period.

### 5.2 Response

Ergon Energy has responded to the above requirements in Ergon Energy Schedule 1 Response attached to this Final Submission.

Ergon Energy's Schedule 1 responses generally take the form of:

- a direct written response to the requirement
- a reference to Ergon Energy's Regulatory Proposal and / or to one or more attachments to the Regulatory Proposal; or
- a combination of the above.

Note that the Regulatory Templates, the Basis of Preparation Documents, the Audit and Review Reports, the Board Resolution and the Statutory Declaration are provided as separate attachments to this Final Submission.

Refer to Table 9-1: List of Attachments.

## 6. AUDIT AND REVIEW REPORTS

*Schedule 1, paragraph 32; Schedule 2, paragraph 1.3; Appendix C: Audit and Review Requirements*

### 6.1 Requirement

Schedule 1, paragraph 32 requires the provision of Audit Report(s) and Review Report(s) in accordance with the requirements of the Notice and Appendix C: Audit and Review Requirements. Ergon Energy must provide all reports from the Auditor to Ergon Energy's management regarding the audit review and/or auditors' opinions or assessment.

Schedule 2, paragraph 1.3 requires Ergon Energy to prepare, using a person(s) who satisfies the requirements of paragraph 2 of Appendix C, an *Audit report* and Review Report(s) (as applicable) in accordance with the requirements of this *Notice*.

Appendix C sets out in detail the audit and review requirements. Paragraph 1.1 provides that the independent audit or review process set out in this Appendix C applies to:

- Financial Actual Information in the Microsoft Excel Workbook attached at Appendix A;
- Estimated Financial Information in the Microsoft Excel Workbook attached at Appendix A where Ergon Energy certifies that it is not possible to provide actual historical information;
- Actual Non-financial Information in the Microsoft Excel Workbooks attached at Appendix A;
- The Basis of Preparation document(s) for historical information.

Paragraphs 2 and 3 of Appendix C specify the class of persons to conduct the audit and review and the Australian Auditing and Assurance Standards to which the audits and review must comply.

Paragraph 3.4 provides that no further independent audit or review is required for Actual Information or Estimated Information that:

- Has previously been audited according to the standards set out in paragraph 3.2, in the case of Actual historical Financial Information, and paragraph 3.3, in the case of Estimated historical Financial Information and submitted to the AER through CA and EB or AP RIN processes; and
- Is not materially altered by the CAM or service classifications to take effect from 1 July 2015.

Conversely, paragraph 3.5 provides that the independent audit or review process set out in Appendix C will apply to Information that:

- Has previously been audited according to the standards set out in paragraph 3.2, in the case of Actual historical Financial Information, and paragraph 3.3, in the case of Estimated historical Financial Information and submitted to the AER through CA and EB or AP RIN processes; and
- Is materially altered by the Cost Allocation Method (CAM) or service classifications to take effect from 1 July 2015.

The review of Actual Information or Estimated Information referred to in paragraph 3.5 must comply with the ASRE 2405 Review of Historical Financial Information Other than a Financial Report. This review must be undertaken by a person as set out in paragraph 2.



In addition, on 25 September 2014, the AER advised that Sheet X - Disposals required in accordance with Schedule 1, paragraph 36 should also be subject to the audit and review requirements outlined in Appendix C of the Notice.

### 6.2 Response

Ergon Energy advises that the Auditor-General of Queensland was appointed to audit and review the historical Financial and (some) Non-Financial Information (Actual or Estimated) contained in the Regulatory Templates, and associated Basis of Preparation documents, in accordance with the Audit scope at Appendix C of the Notice.

Ergon Energy further advises that PB was appointed to review the remaining historical Non-Financial Information contained in the Regulatory Templates, and associated Basis of Preparation documents, in accordance with the Audit scope at Appendix C of the Notice.

The scope of the audits and reviews undertaken by the QAO and PB is outlined their respective Audit and Review Reports.

Note, a number of the Regulatory Templates include and/or rely upon data has been audited and reported through previous EB, CA and AP RINs.

In accordance with the requirements outlined above, where the historical data has not been materially altered by the CAM or service classifications to take effect from 1 July 2015, or otherwise amended or corrected, the previously audited data and associated Basis of Preparation documents have been relied upon by the auditors.

Where historical data has been materially altered by the CAM or service classifications, or otherwise amended or corrected, the Reset RIN Basis of Preparation document explains the changes and the data has been audited and reviewed in accordance with the requirements outlined at Appendix C of the Notice.

Any 'new' historical data (i.e. not previously audited and reported), and associated Basis of Preparation documents, has also be audited and reviewed in accordance with the requirements outlined at Appendix C of the Notice.

Ergon Energy notes that the historical data in Sheet X - Disposals required in accordance with Schedule 1, paragraph 36 has also been audited.

Ergon Energy provides the following results of the abovementioned audits and reviews as attachments to this Submission:

- QAO Reset RIN Audit and Review Report. Note this report contains the following sections:
  - Actual Historical Financial Information audit report
  - Estimated Historical Financial Information review report
  - Actual and Estimated Historical Non-Financial Information review report.
- Review Report by PB:
  - Ergon Energy, Review of Reset RIN Non-Financial Information.

Refer to Table 9-1: List of Attachments.

## 7. STATUTORY DECLARATION

### *Appendix B*

### 7.1 Requirement

In accordance with Appendix B of the Notice, an officer, for the purposes of the NEL, of Ergon Energy is required to make a Statutory Declaration in relation to the Notice.

A pro forma Statutory Declaration was provided at Appendix B of the Notice for this purpose. The Statutory Declaration requires the officer to solemnly and sincerely declare that the actual information provided in Ergon Energy's response to the Notice is, to the vest of the officer's information, knowledge and belief:

- in accordance with the requirements of the Notice; and
- true and accurate.
- Where it is not possible to provide actual information to comply with the Notice, the officer is required to solemnly and sincerely declare that Ergon Energy has, to the best of the officer's information, knowledge and belief:
- provided Ergon Energy's best estimate of the information in accordance with the requirements of the Notice; and
- provided the basis for each estimate, including assumptions made and reasons why the estimate is the best estimate, given the information sought in the Notice.

### 7.2 Response

Ergon Energy herein provides a Statutory Declaration signed by the Chief Executive of Ergon Energy Corporation Limited as an attachment to this Final Submission.

Refer to Table 9-1: List of Attachments.

## 8. BOARD RESOLUTION

*Schedule 1, paragraph 33*

### 8.1 Requirement

In accordance with Schedule 1, paragraph 33, Ergon Energy is required to provide proof (such as an extract from the board minutes, or a resolution signed by a necessary majority of directors) that Ergon Energy's Board has resolved that, to the best of the Board's information, knowledge and belief, the information provided in the response to paragraph 1.1 (being the information to be provided in the Microsoft Excel Workbooks attached at Appendix A) is:

- for Actual Information, true and accurate; and
- where Ergon Energy cannot provide Actual Information, Ergon Energy's best estimate in relation to historical information, or best forecast in relation to forecast information.

### 8.2 Response

Ergon Energy herein provides a Board Resolution signed by the Chair of Ergon Energy Corporation Limited, as authorised by a majority of the directors of the Board, as an attachment to this Final Submission.

Refer to Table 9-1: List of Attachments.

## 9. APPENDIX A – LIST OF ATTACHMENTS

Table 9-1: List of Attachments

Attachment
QLD – RESET RIN 2015-20 – Actual Information - Public
QLD – RESET RIN 2015-20 – Estimated Information - Public
QLD – RESET RIN 2015-20 – Consolidated Information - Public
QLD – RESET RIN 2015-20 – Actual Information – Confidential versions
QLD – RESET RIN 2015-20 – Estimated Information – Confidential versions
QLD – RESET RIN 2015-20 – Consolidated Information – Confidential versions
QLD – RESET RIN 2015-20 – Ergon Disposals – Actual Information
QLD – RESET RIN 2015-20 – Ergon Disposals – Estimated Information
QLD – RESET RIN 2015-20 – Ergon Disposals – Consolidated Information
EECL RESET RIN Basis of Preparation documents (refer to Table 9-2: Basis of Preparation)
Ergon Energy Reset RIN 2015-20 Schedule 1 Response
QAO Reset RIN Audit and Review Report
Parsons Brinkerhoff, Ergon Energy, Review of Reset RIN Non-Financial Information
Officer of the Company - Statutory Declaration (signed)
Ergon Energy Corporation Limited - Board Resolution (signed)

**Table 9-2: Basis of Preparation**

Template Name	BOP Name	BOP Attachments
2.1 Expenditure Summary	EECL RESET RIN HISTORICAL BOP_T2.1	Attachment 2.1A - Ergon Energy Reset RIN - Basis of Prep 2 1 EXPS Attachment 2.1B - EECL RESETRIN T2.1 Reconciliation to CA RIN Attachment 2.1C - EECL 0913 CARIN_T2.1 EXPS A1 Attachment 2.1C - EECL 0913 CARIN_T2.1_EXPS Attachment 2.1D - EECL 1314 CARIN_T2.1 EXPS A1 Attachment 2.1D - EECL 1314 CARIN_T2.1 EXPS
2.2 Repex	EECL RESETRIN HISTORICAL BOP_T2.2	Attachment 2.2A - EECL 0913 CARIN_T2.2 Attachment 2.2B - EECL 1314 CARIN_T2.2
2.3 Augex	EECL RESETRIN HISTORICAL BOP_T2.3	Attachment 2.3A - EECL 0913 CARIN_T2.3 Attachment 2.3B - EECL 1314 CARIN_T2.3 Attachment 2.3C - EECL RESETRIN T2.3_AUGX EECL 1314 CARIN_T2.3 AGX A1
2.4 Augex model	EECL RESETRIN HISTORICAL BOP_T2 4	-
2.5 Connections	EECL RESETRIN HISTORICAL BOP_T2.5	Attachment 2.5A - EECL 0913 CARIN_T2.5 Attachment 2.5B - EECL 1314 CARIN_T2.5
2.6 Non-network	EECL RESETRIN HISTORICAL BOP T_2.6	Attachment 2.6A - EECL 0913 CARIN_T2.6 Attachment 2.6B - EECL 1314 CARIN_T2.6
2.7 Vegetation Management	EECL RESETRIN HISTORICAL BOP_T2.7	Attachment 2.7A - EECL 0913 CARIN_T2.7 Attachment 2.7B - EECL 1314 CARIN_T2.7 EECL 1314 CARIN_T2.7 VGMT A1

Template Name	BOP Name	BOP Attachments
		EECL 1314 CARIN_T2.7 VGMT A2 EECL 1314 CARIN_T2.7 VGMT A3 EECL 1314 CARIN_T2.7 VGMT A4
2.8 Maintenance	EECL RESETRIN HISTORICAL BOP_T2.8	Attachment 2.8A - EECL 0913 CARIN_T2.8 Attachment 2.8B - EECL 1314 CARIN_T2.8
2.9 Emergency Response	EECL RESETRIN HISTORICAL BOP_T2.9	Attachment 2.9A - EECL 0913 CARIN_T2.9 Attachment 2.9B - EECL 1314 CARIN_T2.9
2.10 Overheads	EECL RESETRIN HISTORICAL BOP T_2.10	Attachment 2.10A - EECL 1314 CARIN_T2.10 Attachment 2.10B - EECL 0913 CARIN_T2.10
2.11 Labour	EECL RESETRIN HISTORICAL BOP_T2 11	Attachment 2.11A - EECL 0913 CARIN_T2.11 Attachment 2.11B - EECL 1314 CARIN_T2.11
2.12 Input tables	EECL RESETRIN HISTORICAL BOP_T2.12	Attachment 2.12A - EECL 0913 CARIN_T2.12 Attachment 2.12B - EECL 1314 CARIN_T2.12
2.13 Provisions	EECL RESETRIN HISTORICAL BOP_T2.13	Attachment 2.13A - EE_0506-1213EBRIN Attachment 2.13B - EECL 1314 BMRIN
2.14 Forecast Price Changes	EECL RESETRIN HISTORICAL BOP_T2.14	Attachment 2.14A - Ergon Energy installed escalator model ver 3a (Ergon release)
2.15 Insurance and self-insurance	EECL RESETRIN HISTORICAL BOP_T2.15	-
2.17 Step Changes	EECL RESETRIN HISTORICAL _T2.17	-
3.2 Opex	EECL RESETRIN HISTORICAL BOP_T3.2	Attachment 3.2A - EE_0506-1213EBRIN Attachment 3.2B - EECL 1314 BMRIN_T3
4.1 Public Lighting	EECL RESET RIN HISTORICAL BOP_T4.1	Attachment 4.1A EECL 0913 CARIN_T4.1 Attachment 4.1B - EECL 1314 CARIN_T4.1
4.2 Metering	EECL RESET RIN HISTORICAL BOP_T4.2	Attachment 4.2A - EECL 0913 CARIN_T4.2

Template Name	BOP Name	BOP Attachments
		Attachment 4.2B - EECL 1314 CARIN_T4.2
4.3 Fee-based services	EECL RESETRIN HISTORICAL BOP_T4.3	Attachment 4.3A - EECL 0913 CARIN_T4.3 Attachment 4.3B - EECL 1314 CARIN_T4.3
4.4 Quoted services	EECL RESETRIN HISTORICAL BOP_T4.4	Attachment 4.4A - EECL 0913 CARIN_T4.4 Attachment 4.4B - EECL 1314 CARIN_T4.4
5.2 Asset Age Profile	EECL RESETRIN HISTORICAL BOP_T5.2	-
5.4 MD & utilisation - Spatial	EECL RESETRIN HISTORICAL BOP_T5.4	Attachment 5.4A - EECL 1314 CARIN
6.1 Telephone Answering	EECL RESETRIN HISTORICAL BOP_T6.1	-
6.2 Reliability and Customer Service Performance	EECL RESETRIN HISTORICAL BOP_T6.2	-
6.3 Sustained interruptions to supply	EECL RESETRIN HISTORICAL BOP_T6.3	-
6.4 Historical MEDs	EECL RESETRIN HISTORICAL BOP_T6.4	-
7.4 Shared Assets	EECL RESETRIN HISTORICAL BOP_T7.4	Please refer to the Regulatory Proposal attachment 03.01.02 "Other Revenue Adjustments"
7.5 EBSS	EECL RESETRIN HISTORICAL BOP_T7.5	-
7.7 Services and indicative prices	EECL RESETRIN HISTORICAL BOP_T7.7	Attachment 7.7A - EECL 1314 BMRIN_T3.1
X Disposals	EECL RESETRIN HISTORICAL BOP_TX	-

**Customer Service**

13 10 46

7.00am – 6.30pm, Monday to Friday

**Faults Only**

13 22 96

24 hours a day, 7 days a week

**Life-Threatening Emergencies Only**

Triple zero (000) or 13 16 70

24 hours a day, 7 days a week

**Ergon Energy Corporation Limited ABN 50 087 646 062**  
**Ergon Energy Queensland Pty Ltd ABN 11 121 177 802**

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