24 September 2021

Mr. Warwick Anderson
General Manager, Network Pricing
Australian Energy Regulator
GPO Box 3131, Canberra ACT 2601

Dear Mr Anderson

Evoenergy submission on AER Standardised ANS model

Evoenergy welcomes the opportunity to make a submission to the Australian Energy Regulator's (AER) August 2021 Issues Paper 'Standardised ANS Model'. Evoenergy supports the AER's development of a standardised ANS model and agrees that stakeholders will benefit from a streamlined and consistent process.

Evoenergy has reviewed the preliminary Ancillary Network Services (ANS) model and appreciates that this version is for consultation purposes only. Evoenergy's review identified additional functions that will allow the model to accommodate Evoenergy's existing suite of Ancillary Services and improve the models' transparency. These are listed below.

1. **Add an input for service codes**
   Each of Evoenergy's ANS have an associated code which serves as a point of reference across various models and documents including the Schedule of Charges and Annual Network Pricing Proposal. An input for a code would assist the referencing of ANS across other models and documents.

2. **Allow more field and non-field labour categories per ANS**
   The standardised ANS model allows the assignment of up to two categories of field and non-field labour to each service. Some of Evoenergy's ANS, such as a 'Pole Stay Replacement with Standard Stay', use up to four different field labour service categories and three non-field labour categories, which the preliminary standardised ANS model is unable to facilitate. Increasing the number of service categories that can be assigned (within the model) to at least three for non-field labour and four for field labour, will address this issue.

3. **Include the ability to add crews as labour categories**
   Evoenergy's existing ANS model allocates crews to some services rather than labour categories. A crew is a combined group of labour categories e.g. a crew may consist of two line workers and one trade assistant. The ability to assign a crew to an ANS rather than multiple individual labour categories will reduce the number of inputs for some ANS. This will improve the usability of the model.

Evoenergy will participate in any workshops held by the AER regarding the standardised ANS model to ensure the resulting model is both fit-for-purpose and transparent. If you wish to discuss

Evoenergy's submission further, please contact Luke Cowen on [redacted]

Yours sincerely

[redacted]

Peter Billing
General Manager Evoenergy