



CitiPower Pty

2012 Pricing Proposal

17 November 2011

CITIPower PTy'S 2012 PRICING PROPOSAL

Shortened forms

Abbreviation	Definition or description
AER	Australian Energy Regulator
AMI	Advanced Metering Infrastructure
Augmentation	Investment in new network assets to meet increased demand
Capacity	The amount of energy that a part of the network is able to carry
CitiPower	CitiPower Pty
Contestability	Customer choice of electricity supplier
Controlled Load	The DNSP controls the hours in which the supply is made available
Cost of Supply Model	Theoretical and algorithmic model used to calculate prices, which conform to the pricing goals
Demand	Energy consumption at a point in time
Demand Management	Attempt to modify demand behaviour so as to constrain demand at critical times
DPPC	Designated Pricing Proposal Charges
Distribution Network	The assets and service which links energy customers to the transmission network
Distributor, DNSP	Distribution Network Service Provider
Draft Decision	The Australian Energy Regulator's Draft Decision on Victoria - distribution determination 2011 to 2015, June 2010
DUoS	Distribution Use of System. The utilisation of the distribution network in the provision of electricity to consumers (a component of NUoS)
Final Decision	The Australian Energy Regulator's Final Decision on Victoria - distribution determination 2011 to 2015, October 2010
High Voltage	Equipment or supplies at voltages of 22 or 11kV
GP&L	General Power & Light
Guideline 14	Electricity Industry Guideline 14, Provision of Services by Electricity Distributors, 13 April 2004

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Abbreviation	Definition or description
Inclining Block	A network tariff energy rate in which the rate increase above specific consumption thresholds
JSCR	Jurisdictional Scheme Cost Recovery
kVA, MVA	Kilo-volt amps and Mega-volt amps, units of instantaneous total electrical power demand. Usually the peak demand is referenced. See also PF for the relationship between power demand quantities
kVAr, MVAr	Kilo-volt amps (reactive) and Mega-volt amps (reactive) units of instantaneous reactive electrical power demand. Usually the peak demand is referenced. See also PF for the relationship between power demand quantities
kW, MW	Kilo-watts and Mega-watts, units of instantaneous real electrical power demand. Usually the peak demand is referenced. See also PF for the relationship between power demand quantities
kWh, MWh	Kilo-watt hours and Mega-watt hours, units of electrical energy consumption
Low Voltage	Equipment or supply at a voltage of 220 V single phase or 415 V, three phase
LRMC	Long Run Marginal Costs
Marginal Cost	The cost of providing a small increment of service. The Long Run Marginal Cost (LRMC) includes future investment; Short Run Marginal Cost (SRMC) considers only the costs involved without extra investment
Market Participant	Businesses involved in the electricity industry are referred to as Market or Code Participants
NEL	National Electricity Law
NEM	National Electricity Market
NUoS	Network Use of System. The utilisation of the total electricity network in the provision of electricity to consumers (NUoS = DUoS + DPPC + JSCR + Pass through)
Power Factor (PF)	<p>A measure of the ratio of real power to total power of a load. The relationship between real, reactive and total power is as follows:</p> $PF = \text{Real Power (kW)} / \text{Total Power (kVA)}$ $\text{Total Power (kVA)} = (\text{kW}^2 + \text{kVAr}^2)^{0.5}$

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Abbreviation	Definition or description
Price Signal	Prices set to convey a desired behaviour because of the costs associated with supplying the service
Price Structure	The components that make up a Price available to customers
Pricing Proposal	CitiPower's Initial Pricing Proposal, submitted in accordance with the Rules (this document)
Retailer	A financially responsible market participant supplying electricity to customers
Rules	Australian Energy Market Commission, National Electricity Rules (NER), Version 45, 14 July 2011
Subtransmission	Equipment or supplies at voltage levels of 66kV
Supply Rate	The fixed daily cost component of a Network price
Tariff	A grouping of customers who are subject to the same network price components and conditions of supply
Tariff class	A class of customers for one or more direct control services who are subject to a particular tariff or particular tariffs
ToU	Time of Use, a system of pricing where energy or demand charges are higher in periods of peak utilisation of the network
Transmission Network	The assets and service that enable generators to transmit their electrical energy to population centres.
Unmetered supply	A connection to the distribution system which is not equipped with a meter and has estimated consumption. Connections to public lights, phone boxes, traffic lights and the like are not normally metered
WAPC	Weighted Average Price Cap, a form of regulatory price control, where the allowable price change is based on the weighted historic consumption of each price

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CitiPower –Pricing Proposal 2012

1 Introduction

CitiPower submits this Pricing Proposal to the AER, in accordance with the requirements of the Rules.

The period covered by this Pricing Proposal is the 2011-15 regulatory control period.

The Pricing Proposal covers all of CitiPower's direct control services.

1.1 National Electricity Rules

Clause 6.1.1 of the Rules confers responsibility on the AER for the economic regulation of distribution services provided by means of, or in connection with, distribution systems that form part of the national grid.

In accordance with clause 6.2.1 and 6.2.2 of the Rules, the AER has classified CitiPower's distribution services into the following three classes:

- direct control services;
- negotiated distribution services; and
- un-regulated distribution services.

Direct control services have been further divided into the following two subclasses:

- standard control services; and
- alternative control services.

This Pricing Proposal is relevant to all of the direct control services.

1.2 Scope of CitiPower's Pricing Proposal

CitiPower's Pricing Proposal sets out the proposed prices required to comply with the WAPC approved by the AER in the Final Decision.

This Pricing Proposal is submitted in accordance with, and complies with, the requirements of:

- the NEL;
- the Rules; and
- the AER's Final Decision.

1.3 Structure of CitiPower's Pricing Proposal

In Part I of the Rules, clause 6.18, sets out the requirements concerning distribution pricing. These requirements include the *pricing principles* which must be followed, the requirement for this Pricing Proposal, and the matters the Pricing Proposal must address.

The Final Decision has been made pursuant to clause 6.11.1 of the Rules. Several aspects of that determination impose requirements concerning distribution pricing, including:

- classification of services;
- the pricing control mechanism(s), X factors and side constraints;

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- assigning and reassigning customers to tariff classes;
- recovery of transmission charges¹; and
- recovery of jurisdictional scheme amounts.

This Pricing Proposal has been structured so as to allow compliance with the specific requirements of the Rules and the Final Decision to be readily ascertained.

Chapter	Purpose
2 Regulatory requirements	Summarises the regulatory requirements as they relate to CitiPower's Pricing Proposal including the relevant requirements of the Rules and the Final Decision
3 Business overview	Summarises the characteristics of CitiPower's network that provide the context for CitiPower's network tariff strategy.
4 Tariff classes	Defines the tariffs and tariff classes into which CitiPower's customers for direct control services are divided and their charging parameters.
5 Network tariff strategy	Outlines CitiPower's network tariff strategy and indicates how tariff charging parameters are expected to vary.
6 Standard control services tariffs	Describes the nature and extent of the change in CitiPower's DUoS tariffs between 2011 and 2012.
7 Customer impacts	Outlines the expected customer impacts of CitiPower's NUoS prices in 2012 and the system of reviewing those impacts throughout the regulatory control period.
8 Pricing of standard control services	Demonstrates that CitiPower's 2012 prices comply with the pricing X factors, side constraints and the NER Pricing Principles.
9 Recovery of designated pricing proposal charges	Sets out CitiPower's designated pricing proposal charges cost recovery tariff setting methodology and demonstrates adjustments made to the tariffs resulting from the actual recoveries of these charges in 2010 and subsequent rule changes made during 2011.
10 Recovery of jurisdictional scheme amounts	Sets out CitiPower's jurisdictional scheme cost recovery tariff setting methodology and demonstrates adjustments made to the tariffs resulting from the actual recoveries of these charges in 2010.
11 Customer tariff class assignment and reassignment	Sets out CitiPower's 2012 tariff assignment and reassignment strategy.
12 Alternative control services	Sets out CitiPower's tariffs for alternative control services.
Appendices	Separately provided.

Table 1: Structure of CitiPower's Pricing Proposal

1.4 Confidential information

CitiPower has nominated some of the Appendices that constitute part of this Pricing Proposal as confidential.

CitiPower requests that the AER does not disclose the information contained in these confidential Appendices to any person outside of the AER.

¹ Subsequent to the final determination a rule change has arisen that will impact this submission. Which is the recovery of designated pricing proposal charges.

2 Regulatory requirements

This Chapter summarises the regulatory requirements pertaining to CitiPower's Pricing Proposal, including the relevant requirements of the Rules and those of the Final Decision.

2.1 Rules requirements

To comply with clause 6.18.2 of the Rules, CitiPower's Pricing Proposal must include the elements below.

6.18.2 Pricing proposals

- (a) *A Distribution Network Service Provider* must:
 - (1) submit to the *AER*, as soon as practicable, and in any case within 15 *business days*, after *publication* of the distribution determination, a *pricing proposal* (the **initial pricing proposal**) for the first *regulatory year* of the *regulatory control period*; and
 - (2) submit to the *AER*, at least 2 months before the commencement of the second and each subsequent *regulatory year* of the *regulatory control period*, a further *pricing proposal* (an **annual pricing proposal**) for the relevant *regulatory year*.
- (b) *A pricing proposal* must:
 - (1) set out the *tariff classes* that are to apply for the relevant *regulatory year*; and
 - (2) set out the proposed tariffs for each *tariff class*; and
 - (3) set out, for each proposed tariff, the *charging parameters* and the elements of service to which each *charging parameter* relates; and
 - (4) set out, for each *tariff class* related to *standard control services*, the expected weighted average revenue for the relevant *regulatory year* and also for the current *regulatory year*; and
 - (5) set out the nature of any variation or adjustment to the tariff that could occur during the course of the *regulatory year* and the basis on which it could occur; and
 - (6) set out how *designated pricing proposal charges* are to be passed on to customers and any adjustments to tariffs resulting from over or under recovery of those charges in the previous *regulatory year*; and
- (6A) set out how *jurisdictional scheme amounts* for each *approved jurisdictional scheme* are to be passed on to customers and any adjustments to tariffs resulting from over or under recovery of those amounts; and

- (6B) describe how each approved jurisdictional scheme that has been amended since the last jurisdictional scheme approval date meets the *jurisdictional scheme eligibility criteria*; and
- (7) demonstrate compliance with the *Rules* and any applicable distribution determination; and
- (8) describe the nature and extent of change from the previous *regulatory year* and demonstrate that the changes comply with the *Rules* and any applicable distribution determination.

In accordance with clause 6.18.2(a) of the Rules, CitiPower is submitting this Pricing Proposal for the second year of the 2011-15 regulatory control period to the AER, within the required period.

This Pricing Proposal has been prepared by CitiPower in such a way as to demonstrate that it complies with all of the requirements of clause 6.18.2(b) of the Rules above.

The other relevant sections of the Rules that have been addressed in formulating this Pricing Proposal are as follows:

- 6.18.3 Tariff classes
- 6.18.4 Principles governing assignment or re-assignment of customers to tariff classes and assessment and review of basis of charging
- 6.18.5 Pricing principles
- 6.18.6 Side constraints on tariffs for standard control services
- 6.18.7 Recovery of designated pricing proposal charges
- 6.18.7A Recovery of jurisdictional scheme amounts
- 6.18.8 Approval of pricing proposal
- 6.18.9 Publication of information about tariffs and tariff classes

Reference to these clauses has been made in the appropriate sections of this Pricing Proposal, to demonstrate how CitiPower has complied with each applicable Rules provision.

2.2 Requirements of the Final Decision

The Final Decision has been made pursuant to the provisions contained in clause 6.11.1 of the Rules. It imposes a number of requirements that are relevant to a Pricing Proposal. The relevant requirements are in the following chapters and appendices of the Final Decision:

- Chapter 2 Classification of services
- Appendix B Service Classification
- Chapter 4 Control mechanism for standard control services
- Appendix F Transmission tariffs and jurisdictional schemes
- Chapter 15 Service target performance incentive scheme
- Chapter 16 Cost pass throughs
- Appendix E.3 Calculation of the pass through factor

Chapter 18	Building block revenue requirements
Chapter 19	Public lighting
Chapter 20	Other alternative control services
Appendix Q	Alternative control prices and labour rates

Where it is necessary to demonstrate that CitiPower has complied with a requirement of the Final Decision, reference to the relevant component of the Final Decision has been made in the appropriate section of this Pricing Proposal.

2.3 Principal elements of the Final Decision

The principal elements of the Final Decision pertaining to direct control services (comprising standard and alternative control services) are outlined in this section.

Weighted Average Price Cap for standard control services

In Chapter 4 section 4.5.1 of the Final Decision, the AER has determined the WAPC formula to apply to CitiPower's standard control services for the next regulatory control period will be as follows:

$$\frac{\sum_{i=1}^n \sum_{j=1}^m p_t^{ij} \times q_{t-2}^{ij}}{\sum_{i=1}^n \sum_{j=1}^m p_{t-1}^{ij} \times q_{t-2}^{ij}} \leq (1 + CPI_t) \times (1 - X_t) \times (1 + S_t) \times (1 + L_t) \pm (passthrough_t)$$

Where CitiPower has 'n' distribution tariffs, which each have up to 'm' distribution tariff components, and where:

regulatory year 't' is the regulatory year in respect of which the calculation is being made;

regulatory year 't-1' is the regulatory year immediately preceding regulatory year 't';

regulatory year 't-2' is the regulatory year immediately preceding regulatory year 't-1';

p_t^{ij} is the proposed distribution tariff for component *j* of distribution tariff *i* in regulatory year *t*;

p_{t-1}^{ij} is the distribution tariff being charged in regulatory year *t-1* for component *j* of distribution tariff *i*;

q_{t-2}^{ij} is the quantity of component *j* of distribution tariff *i* that was delivered in regulatory year *t-2*;

CPI_t is calculated as follows:

The Consumer Price Index, All Groups Index Number (weighted average of eight capital cities) published by the Australia Bureau of Statistics for the September Quarter immediately preceding the start of regulatory year *t*;

divided by

The Consumer Price Index, All Groups Index Number (weighted average of eight capital cities) published by the Australia Bureau of Statistics for

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the September Quarter immediately preceding the start of regulatory year t-1;

minus one.

X_t is the value of X for year t of the regulatory control period as determined by the AER in chapter 18 of the Final Decision;

S_t is the Service Target Performance Incentive Scheme factor to be applied in regulatory year t ;

L_t is the licence fee pass through adjustment to be applied in regulatory year t in accordance with Appendix E of this Final Decision; and

$passthrough_t$ represents approved pass through amounts with respect to regulatory year t as determined by the AER under clause 6.6 of the NER and chapter 16 and Appendix E of this Final Decision.

Side constraint for standard control services

Chapter 4 section 4.5.2 of the Final Decision also contains the side constraint formula to apply to CitiPower's standard control services for the next regulatory control period:

$$\frac{\sum_{i=1}^n \sum_{j=1}^m p_t^{ij} \times q_{t-2}^{ij}}{\sum_{i=1}^n \sum_{j=1}^m p_{t-1}^{ij} \times q_{t-2}^{ij}} \leq (1 + CPI_t) \times (1 - X_t) \times (1 + S_t) \times (1 + L_t) \times (1 + 2\%) \pm (passthrough_t)$$

Revenue requirement and pricing X factors for standard control services

Chapter 18, table 18.22 of the Final Decision contained CitiPower's revenue requirements and pricing X factors for standard control services. Table 2 summarises the annual revenue requirements and pricing X factors for the 2011-15 regulatory control period for standard control services.

	2011	2012	2013	2014	2015
Return on capital	121.0	132.3	143.5	156.3	168.9
Regulatory depreciation	34.7	38.4	42.3	46.5	51.8
Operating expenditure	46.3	47.6	50.1	50.8	53.3
Efficiency carryover amounts	4.5	-8.4	-6.2	-5.5	0.0
S factor amounts	-2.2	-4.7	-3.6	-0.4	-4.0
Tax allowance	6.3	6.7	7.4	7.7	8.4
Annual revenue requirements	210.6	211.8	233.5	255.4	278.5
X factors (%) ²	6.41	-4.00	-4.00	-5.00	-5.00

Table 2 - Revenue requirement and X factors for standard control services (\$M, nominal)

The associated pricing X factors for standard control services have been incorporated into this Pricing Proposal.

Revenue requirement and pricing X factors for alternative control services

² Negative values for X indicate real price increases under the CPI-X formula.

Appendix Q of the Final Decision outlines the AER's final determination on CitiPower's initial charges and X factors for the 2011-15 regulatory control period for Alternative Control Services.

2.4 Publication of information about tariffs and tariff classes

Clause 6.18.9 of the Rules requires CitiPower to publish the following information on its tariffs and tariff classes.

6.18.9 Publication of information about tariffs and tariff classes

- (a) A *Distribution Network Service Provider* must maintain on its website:
 - (1) a statement of the provider's *tariff classes* and the tariffs applicable to each class; and
 - (2) for each tariff – the *charging parameters* and the elements of the service to which each *charging parameter* relates; and
 - (3) a statement of expected price trends (to be updated for each *regulatory year*) giving an indication of how the *Distribution Network Service Provider* expects prices to change over the *regulatory control period* and the reasons for the expected changes.
- (b) The information for a particular *regulatory year* must, if practicable, be posted on the website 20 *business days* before the commencement of the relevant *regulatory year* and, if that is not practicable, as soon as practicable thereafter.

The information on tariffs and tariff classes contained in the following sections of this Pricing Proposal have been prepared and published in conformity with the requirements of this clause.

3 Business overview

This chapter of the Pricing Proposal provides contextual information on CitiPower's business circumstances. This provides the background both to CitiPower's existing network tariffs and the rationale for the changes to tariffs that are proposed during the 2011-15 regulatory control period.

3.1 CitiPower business

CitiPower is a privately owned, Victorian-based electricity distribution company. CitiPower is Victoria's smallest electricity distribution company in terms of the size of its network but contains the headquarters of some of Australia's largest companies and is the home of Victoria's largest cultural and sporting venues. The CitiPower network area accounts for 25 per cent of Victoria's employment and 22 per cent of Gross State Product. The network serves over 310,000 customers.

The CitiPower network covers 157 square kilometres covering the Melbourne central business district and inner suburbs. It is characterised by the highest customer density network in Australia (1,942 customers per square kilometre) and is the most reliable network in Victoria.

The majority of CitiPower's electricity infrastructure is overhead (63 per cent), with more than 58,882 poles carrying 6,478 kilometres of power lines. The network comprises 102 zone substation transformers with a further 4,581 distribution transformers.

3.2 Characteristics of the region

CitiPower's network territory is densely populated. The area serviced by CitiPower's distribution system is shown in Figure 1.

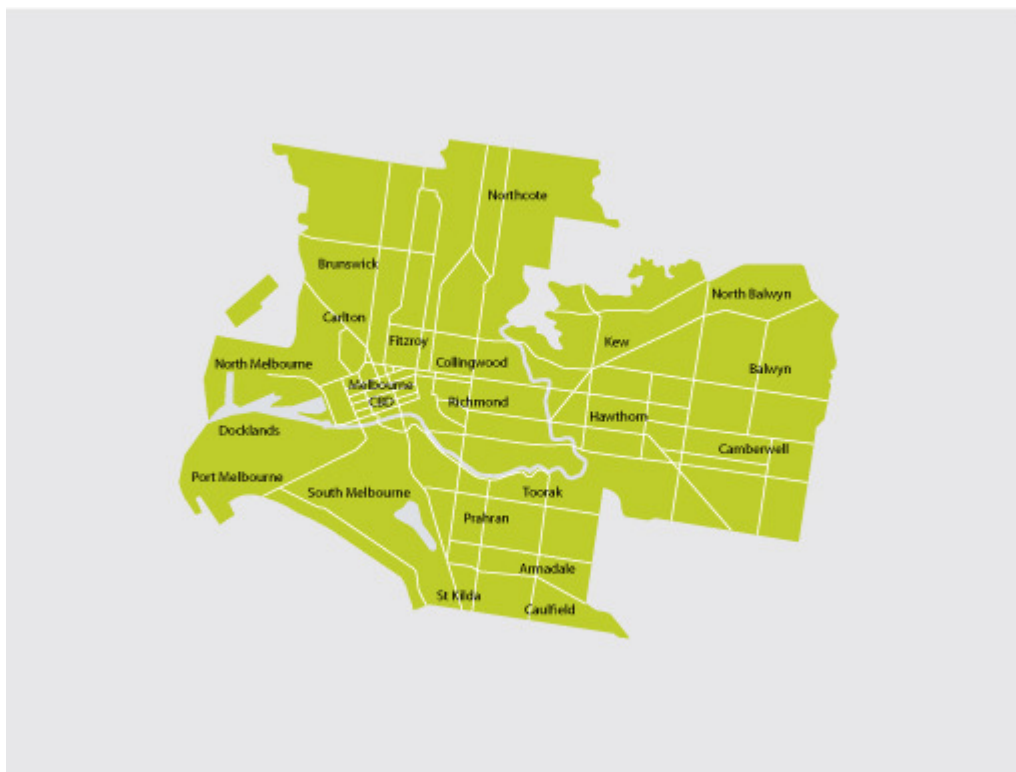


Figure 1 - CitiPower's distribution system

CitiPower has a number of unique characteristics that distinguish it from other Victorian distribution businesses. These include:

- high peak demand growth and increasing utilisation - high summer temperatures and extended heat waves have led to extraordinary demand for air conditioning;
- high customer density - the CitiPower network has an average of 1,942 customers per kilometre representing the most densely populated areas of Victoria; and
- highly meshed network - in comparison with other electricity distribution networks in Australia, CitiPower operates a relatively meshed electricity distribution network, reflecting the importance of reliability to the area it serves and the population density.

All these features result in a distribution network with relatively high capital, operating and maintenance costs. Despite these challenges, CitiPower has continued to deliver significant improvements in reliability, safety and financial performance.

3.3 Climatic conditions

CitiPower's territory has a mostly temperate climate reflecting its proximity to the coast. Although mostly temperate, extended periods of heat wave conditions can occur, 2009 being the most recent.

3.4 Customer and demand profile

CitiPower's territory climate has led to an extraordinary demand for air conditioning. Approximately 75.5%³ of homes in Victoria are now air conditioned, but the consequent high peak network demand occurs for only a small part of the year.

Extremely 'peaky' conditions such as these require network assets and capacity that is under-utilised during much of the year, driving distribution costs higher, on a per unit of energy served basis.

These conditions also provide the impetus for CitiPower's network tariff strategies and innovative tariff developments described later in this Pricing Proposal.

³ ABS Environmental Issues: Energy use and conservation March 2011, Table 15

4 Tariff Classes

This section describes CitiPower's standard control service tariff classes and the way in which they have been constituted to comply with the requirements of the Rules and the AER's Final Decision.

In table B.1 of Appendix B of the Final Decision, the AER has listed the following service classifications:

Service grouping	Services	AER classification
Network services	<ul style="list-style-type: none"> • Constructing the distribution network • Maintaining the distribution network and connection assets • Operating the distribution network and connection assets for DNSP purposes • Designing the distribution network • Planning the distribution network • Emergency response • Administrative support (eg: call centre, network billing) • Location of underground cables ('dial before you dig') 	Standard control services
Connection services	<ul style="list-style-type: none"> • New connections requiring augmentations 	Standard control services
Metering services	<ul style="list-style-type: none"> • Meter investigation • Meter Testing • De-energisation of existing connections • Energisation of existing connections • Special meter reading • Re-test of types 5 and 6 metering installations for first tier customers with annual consumption greater than 160MWh 	Alternative control Services - fee based
Public lighting services	<ul style="list-style-type: none"> • Operation, repair, replacement and maintenance of DNSP public lighting assets • Alteration and relocation of DNSP public lighting assets • New public lighting assets (that is, new lighting types not subject to a regulated charge and new public lighting at greenfield sites) 	Alternative control services - fee based Negotiated services
Quoted services	<ul style="list-style-type: none"> • Rearrangement of network assets at customer request, excluding alteration and relocation of existing public lighting assets • Supply enhancement at customer request • Supply abolishment • Emergency recoverable works • Auditing design and construction • Specification and design enquiry fees • Elective undergrounding where above ground service currently exists • Damage to overhead service cables caused by high load vehicles • High load escorts—lifting overhead lines • Covering of low voltage mains for safety reasons • Routine connections - customers above 100 amps • After hours truck by appointment 	Alternative control services - quoted services

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Service grouping	Services	AER classification
Fee based services	<ul style="list-style-type: none"> • Fault response—not DNSP fault • Temporary disconnect / reconnect services • Wasted attendance—not DNSP fault • Service truck visits • Reserve feeder • PV installation • Routine connections - customers below 100 amps • Temporary supply services 	Alternative control services - fee based
Unclassified services	<ul style="list-style-type: none"> • Provision of possum guards • Repair, installation and maintenance of watchman lights 	Unregulated services

Table 3 - Service classification

In the following extract from section 20 of the Final Decision, the AER discusses the service classification of remote metering services:

This final decision relates to manual services only. It does not set prices for the Victorian DNSPs' remote metering services which are facilitated by the rollout of advanced metering infrastructure (AMI) in Victoria. The regulatory arrangements relating to the AMI rollout are set out in an August 2007 Order in Council made by the Victorian Governor in Council under sections 15A and 46D of the *Electricity Industry Act 2000*. The Order in Council was amended on 25 November 2008, 22 January 2009 and 31 March 2009 (the 'revised Order'). Clause 3 of the revised Order requires that certain metering services (which the AER considers includes new remote services, such as remote energisation and remote special reads) will continue to be regulated as 'excluded services' during the forthcoming regulatory control period.

In section 6 of the *AMI remote service charges Final Decision, February 2011* the following charges were approved and have been classed as follows.

Service grouping	Services	AER classification
Fee based services	<ul style="list-style-type: none"> • Remote Re-energisation • Remote De-energisation • Remote Meter Reconfiguration 	Alternative control services - fee based

Table 4 - Service classification remote services

4.1 Regulatory requirements

4.1.1 Rule requirements

CitiPower's Pricing Proposal must contain the information on tariffs, tariff classes and charging parameters set out in clause 6.18.2(b)(1),(2),(3) of the Rules.

6.18.2 Pricing proposals

- (b) *A pricing proposal* must:
- (1) set out the *tariff classes* that are to apply for the relevant *regulatory year*; and
 - (2) set out the proposed tariffs for each *tariff class*; and

- (3) set out, for each proposed tariff, the *charging parameters* and the elements of service to which each *charging parameter* relates;

CitiPower is required to comply with the following requirements of clause 6.18.3 of the Rules with respect to tariff classes.

6.18.3 Tariff classes

- (a) A *pricing proposal* must define the *tariff classes* into which customers for *direct control services* are divided.
- (b) Each customer for *direct control services* must be a member of 1 or more *tariff classes*.
- (c) Separate *tariff classes* must be constituted for customers to whom *standard control services* are supplied and customers to whom *alternative control services* are supplied (but a customer for both *standard control services* and *alternative control services* may be a member of 2 or more *tariff classes*).
- (d) A *tariff class* must be constituted with regard to:
 - (1) the need to group customers together on an economically efficient basis; and
 - (2) the need to avoid unnecessary transaction costs.

CitiPower is required to comply with the following requirements of clause 6.18.4(a)(3) of the Rules with respect to tariff classes.

6.18.4 Principles governing assignment or re-assignment of customers to tariff classes and assessment and review of basis of charging

- (a) In formulating provisions of a distribution determination governing the assignment of customers to *tariff classes* or the re-assignment of customers from one *tariff class* to another, the AER must have regard to the following principles:
 - (3) however, customers with micro-generation facilities should be treated no less favourably than customers without such facilities but with a similar load profile;

4.1.2 Requirements of the AER's Final Decision

CitiPower has categorised standard control services customer tariffs into five tariff classes.

The AER has established procedures for assigning or reassigning customers to tariff classes in Appendix G of its Final Decision.

Assignment of existing customers to tariff classes of the commencement of the 2011-15 regulatory control period

- 1. Each customer who was a customer of a Victorian DNSP prior to 1 January 2011, and who continues to be a customer of a Victorian DNSP as at 1 January 2011, will be taken to be 'assigned' to the same tariff class which the Victorian DNSP was using to charge that customer immediately prior to 1 January 2011.

Appendix G of the AER's Final Decision also contains procedures for the reassigning of customers to tariff classes, with which CitiPower must comply during the 2011-15 regulatory control period. These procedures are set out in section 11.1.2 of this Pricing Proposal.

4.2 Standard control service tariffs and tariff classes

CitiPower's network use of system tariffs represents the aggregation of distribution use of system tariffs, jurisdictional scheme cost recovery, designated pricing proposal charges tariffs and pass through cost recovery.

Retailers may pass through the components of CitiPower's network tariffs to customers directly, or modify their structure by bundling with the retail component, which includes the cost of purchasing generated energy from the NEM, plus retail costs.

This section outlines the distribution tariff arrangements, which are designed to recover the cost of providing standard control services to customers. These services are segregated into tariffs and tariff classes, which cover all of direct control services that CitiPower provides, as required by clauses 6.18.3(a) and 6.18.3(b) of the Rules.

Section 12 of this Pricing Proposal outlines the arrangements for CitiPower's alternative control services, which in accordance with clause 6.18.3(c) of the Rules has been constituted as a separate tariff class with separate charging parameters.

The designated pricing proposal charges cost recovery section 9 of this Pricing Proposal describes how the designated pricing proposal charges costs incurred by CitiPower are recovered from customers, again with separate charging parameters.

The jurisdictional scheme cost recovery (JSCR) section 10 of this Pricing Proposal describes how the feed-in tariff costs incurred by CitiPower are recovered from customers.

The grouping of customers into standard control service tariffs has historically distinguished between customers on the basis of the following factors:

- The nature and extent of usage of different types of customer;
- For business customers, nature of connection to the network, including the capacity and location or voltage of connection;
- Whether the customer also receives a controlled load service; and
- The type of meter installed at the premises, with a distinction between Types 1-4 metering and Types 5-6 metering.

It should be noted that CitiPower does not distinguish between customers with micro-generation and those without, in either the network tariff or network tariff class in accordance with clause 6.18.4(a)(3) of the Rules.

An important consideration in establishing this set of tariff classes was to reduce the complexity of the overall arrangement by grouping customer tariffs with a similar connection and usage profile together on an economically efficient basis and thereby avoiding unnecessary transaction costs.

In establishing tariff classes that are to be used for the purpose of monitoring pricing compliance, it is desirable and appropriate that similar individual tariffs should be grouped together. This is particularly the case for some business tariffs, where one or

a few large customers would dominate the class and the side constraint would not apply to a tariff class but those large customers.

4.2.1 Standard control services tariffs

Residential customer tariffs have a fixed daily charge (termed the Standing Charge) and an energy component, in common with the tariff structures of many utilities. The inclining block energy charge includes two block levels for the peak component. A separate energy rate applies to the energy consumption within each block level. Each of the tariff components (charging parameters) are determined in accordance with the WAPC price control formula.

Business customer tariffs cover the range of:

- Inclining block energy tariffs for Low Voltage connected customers;
- Fixed daily charge (standing charge) for small to medium businesses;
- Two rate Time of Use (peak and off peak) for Low Voltage connected customers; and
- kW demand tariffs for the largest customers at all voltage levels.

4.2.2 Standard control services tariff classes

The five tariff classes which CitiPower has established are as follows:

- Low voltage residential;
- Low voltage business including unmetered supplies;
- Large low voltage business;
- High voltage business; and
- Sub-transmission.

A description of the tariffs in each of the tariff classes and their charging parameters follows.

Note that, for completeness, those components of charging parameters associated with premium feed-in tariff cost recovery and designated pricing proposal charges tariffs have been shown in the following section.

4.3 Low voltage residential tariff class

This tariff class includes the residential single rate, time-of-use, climate saver and controlled load tariffs.

4.3.1 Low voltage residential single rate tariff

The low voltage residential single rate tariff is available to eligible residential customers taking supply at less than 1kV. These customers ordinarily use a type 5 or type 6 NEM compliant meter and metered energy consumption is charged in two blocks.

The low voltage residential single rate tariff incorporates the charging parameters set out in the following table; which is no longer available to new connections.

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Charging Parameter	Units	Element of service			
		Direct control DUoS	Designated Pricing Proposal Charges DPPC	JSCR Recovery	Description
Supply Rate	\$/day	✓	✓	✗	Pro-rated fixed annual charge
Block 1 Usage Rate	¢/kWh	✓	✓	✓	For consumption up to and including 340kWh/month
Block 2 Usage Rate	¢/kWh	✓	✓	✓	For the balance of peak consumption

Table 5 - Low voltage residential single rate tariff charging parameters

4.3.2 Low voltage residential time-of-use tariff

The low voltage residential time-of-use tariff is available to eligible residential customers taking supply at less than 1kV. These customers ordinarily use a type 5 or type 6 NEM compliant meter and metered peak energy consumption is charged in two blocks. Additionally off-peak energy is charged in one block.

The low voltage residential time-of-use tariff incorporates the charging parameters set out in the following table.

Charging Parameter	Units	Element of service			
		Direct control DUoS	Designated Pricing Proposal Charges DPPC	JSCR Recovery	Description
Supply Rate	\$/day	✓	✓	✗	Pro-rated fixed annual charge
Block 1 Usage Rate	¢/kWh	✓	✓	✓	For consumption up to and including 340kWh/month
Block 2 Usage Rate	¢/kWh	✓	✓	✓	For the balance of peak consumption
Off peak Rate	¢/kWh	✓	✓	✓	For the balance of off peak consumption

Table 6 - Low voltage residential time-of-use tariff charging parameters

4.3.3 Controlled load tariff

The controlled load tariff is available for permanently installed storage water heaters with a rated delivery of not less than 125 litres, storage space heaters and other approved applications. A time switch for the control of the heater and separate metering is installed.

The controlled load tariff incorporates the charging parameters set out in the following table; which is no longer available to new connections.

CITIPower PTY'S 2012 PRICING PROPOSAL

Charging Parameter	Units	Element of service			
		Direct control	Designated Pricing Proposal Charges	JSCR Recovery	Description
		DUoS	DPPC		
Off peak Rate	¢/kWh	✓	✓	✓	For the balance of off peak consumption

Table 7 - Controlled load tariff charging parameters

This tariff is available only to customers that were taking supply under the controlled load tariff prior to 1 January 2010. This tariff is invoiced at the same frequency as the parent tariff.

4.4 Low voltage business tariff class

The low voltage business tariffs cover a broad range of customer sizes and types of metering installations.

4.4.1 Low voltage business single rate tariff

The low voltage business single rate tariff is available for non-residential low voltage customers with a type 5-7 meter installation. Consumption is charged on an inclining scale in four consumption blocks. The low voltage business single rate tariff incorporates the charging parameters set out in the following table; which is no longer available to new connections.

Charging Parameter	Units	Element of service			
		Direct control	Designated Pricing Proposal Charges	JSCR Recovery	Description
		DUoS	DPPC		
Supply Rate	\$/day	✓	✓	✗	Pro-rated fixed annual charge
Block 1 Usage Rate	¢/kWh	✓	✓	✓	For consumption up to and including 340kWh/month
Block 2 Usage Rate	¢/kWh	✓	✓	✓	For the balance of peak consumption

Table 8 - Low voltage business single rate tariff charging parameters

4.4.2 Low voltage business time-of-use tariff

The low voltage business time-of-use tariff has a structure with peak and off-peak consumption charges, using a type 5-7 meter. The customer's peak period energy consumption is charged in four consumption blocks. The low voltage business time-of-use tariff incorporates the charging parameters set out in the following table; which is no longer available to new connections.

CITIPower PTY'S 2012 PRICING PROPOSAL

Charging Parameter	Units	Element of service			
		Direct control DUoS	Designated Pricing Proposal Charges DPPC	JSCR Recovery	Description
Supply Rate	\$/day	✓	✓	✗	Pro-rated fixed annual charge
Block 1 Usage Rate	¢/kWh	✓	✓	✓	For consumption up to and including 340kWh/month
Block 2 Usage Rate	¢/kWh	✓	✓	✓	For the balance of peak consumption
Off peak Rate	¢/kWh	✓	✓	✓	For the balance of off peak consumption

Table 9 - Low voltage business time-of-use tariff charging parameters

4.4.3 Unmetered supply / public lighting tariff

The unmetered supply tariff is applicable to supply points and public lighting that are not metered. Energy consumption is calculated using the appropriate algorithm in the Part B, clause 14 of the Metrology Procedure. The unmetered tariff comprises an energy rate that is applied to the calculated electricity consumption.

The low voltage unmetered usage tariff incorporates the charging parameters set out in the following table.

Charging Parameter	Units	Element of service			
		Direct control DUoS	Designated Pricing Proposal Charges DPPC	JSCR Recovery	Description
Supply Rate	\$/day	✗	✗	✗	Pro-rated fixed annual charge
Block 1 Usage Rate	¢/kWh	✓	✓	✓	For consumption up to and including 340kWh/month
Block 2 Usage Rate	¢/kWh	✓	✓	✓	For the balance of peak consumption
Off peak Rate	¢/kWh	✓	✓	✓	For the balance of off peak consumption

Table 10 - Unmetered supply/public lighting tariff charging parameters

4.5 Large low voltage business including unmetered supplies tariff class

There is also a broad range of customer sizes and types connected to CitiPower's system at large low voltage. They are predominantly commercial installations.

4.5.1 Large low voltage kW demand tariff

Minimum demands between 120kW and 250kW apply to the respective tariffs. The charging parameters of these tariffs are set out in the following table.

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Charging Parameter	Units	Element of service			
		Direct control DUoS	Designated Pricing Proposal Charges DPPC	JSCR Recovery	Description
Supply Rate	\$/day	x	x	x	Pro-rated fixed annual charge
Annual Demand Rate	\$/kW/pa	✓	✓	✓	Pro-rated per month
Block 1 Usage Rate	¢/kWh	✓	✓	✓	For consumption up to and including 340kWh/month
Block 2 Usage Rate	¢/kWh	✓	✓	✓	For the balance of peak consumption
Off peak Rate	¢/kWh	✓	✓	✓	For the balance of off peak consumption

Table 11 - Large low voltage kW demand tariff charging parameters

4.6 High voltage business tariff class

There is also a broad range of customer sizes and types connected to CitiPower's system at high voltage. They are predominantly industrial and large commercial installations.

4.6.1 High voltage kW demand tariff

The kW demand tariff for business customers connected at high voltage is similar in structure to the large low voltage equivalent described in section 4.5.1 of this Pricing Proposal.

Minimum demands between 1,000kW and 20,000kW apply to the respective tariffs. The charging parameters of these tariffs are set out in the following table.

Charging Parameter	Units	Element of service			
		Direct control DUoS	Designated Pricing Proposal Charges DPPC	JSCR Recovery	Description
Supply Rate	\$/day	x	x	x	Pro-rated fixed annual charge
Annual Demand Rate	\$/kW/pa	✓	✓	x	Pro-rated per month
Block 1 Usage Rate	¢/kWh	✓	✓	x	For consumption up to and including 340kWh/month
Block 2 Usage Rate	¢/kWh	✓	✓	x	For the balance of peak consumption
Off peak Rate	¢/kWh	✓	✓	x	For the balance of off peak consumption

Table 12 - High voltage kW demand tariff charging parameters

4.7 Sub-transmission tariff class

The sub-transmission customers are the largest connection size customer segment connected to CitiPower's network. They comprise a range of industrial, manufacturing and mining enterprises.

4.7.1 Sub-transmission kW demand tariff

This kW demand tariff is for larger high voltage connected business customers that take supply on direct transformers at 66kVa. The tariff has a minimum chargeable demand of 10,000kW. A type 1-4 interval meter is required. The charging parameters for this tariff are set out in the following table.

Charging Parameter	Units	Element of service			
		Direct control DUoS	Designated Pricing Proposal Charges DPPC	JSCR Recovery	Description
Supply Rate	\$/day	x	x	x	Pro-rated fixed annual charge
Annual Demand Rate	\$/kW/pa	✓	✓	x	Pro-rated per month
Block 1 Usage Rate	¢/kWh	✓	✓	x	For consumption up to and including 340kWh/month
Block 2 Usage Rate	¢/kWh	✓	✓	x	For the balance of peak consumption
Off peak Rate	¢/kWh	✓	✓	x	For the balance of off peak consumption

Table 13 - Sub-transmission kW demand tariff charging parameters

5 Network tariff strategy

This section contains the objectives that CitiPower applies to the development of its network tariffs. It goes on to outline the strategies CitiPower proposes to pursue in developing tariffs during the 2011-15 regulatory control period.

5.1 Regulatory Requirements

The information in this section concerning potential future network tariff developments is provided pursuant to the following Rules.

6.18.3 Tariff classes

- (d) A *tariff class* must be constituted with regard to:
 - (1) the need to group customers together on an economically efficient basis; and
 - (2) the need to avoid unnecessary transaction costs.

6.18.5 Pricing principles

- (a) For each *tariff class*, the revenue expected to be recovered should lie on or between:
 - (1) an upper bound representing the stand alone cost of serving the customers who belong to that class; and
 - (2) a lower bound representing the avoidable cost of not serving those customers.
- (b) A tariff, and if it consists of 2 or more *charging parameters*, each *charging parameter* for a *tariff class*:
 - (1) must take into account the long run marginal cost for the service or, in the case of a *charging parameter*, for the element of the service to which the *charging parameter* relates; and
 - (2) must be determined having regard to:
 - (i) transaction costs associated with the tariff or each *charging parameter*; and
 - (ii) whether customers of the relevant *tariff class* are able or likely to respond to price signals.
- (c) If, however, as a result of the operation of paragraph (b), the *Distribution Network Service Provider* may not recover the expected revenue, the provider must adjust its tariffs so as to ensure recovery of expected revenue with minimum distortion to efficient patterns of consumption.

6.18.9 Publication of information about tariffs and tariff classes

- (a) A *Distribution Network Service Provider* must maintain on its website:
 - (3) a statement of expected price trends (to be updated for each *regulatory year*) giving an indication of how the *Distribution Network Service Provider* expects prices to change over the

regulatory control period and the reasons for the expected changes.

5.2 Network tariff objectives

This section presents the high level framework that CitiPower applies to the development of its network tariff strategy. The major objectives of network pricing are to some extent conflicting and therefore involve making compromises. They are as follows:

- **Revenue sufficiency** - prices are formulated to recover permitted weighted average prices under the determination.
- **Pricing efficiency** - through their variable components, prices will signal the economic cost of providing network service. Residual costs will be recovered in a manner which least distorts customers' consumption decisions. (In accordance with clause 6.18.5 of the Rules.)
- **Customer equity** - customers should pay a reasonable allocated share of costs and moves towards efficient pricing need to be tempered to limit their impact on some customers. (In accordance with clause 6.18.3(d)(1) of the Rules.)
- **Pricing simplicity** - price structures should be understandable, simple and transparent. (In accordance with clause 6.18.3(d)(2) of the Rules.)

5.3 The need for tariff reform

CitiPower's summer demand is sensitive to the effect of air conditioning demand. High summer peak demands occur during heat wave conditions, which correspond within periods when the elements of the system have least capacity and the power factor of loads is poor.

Significant amounts of capital expenditure on CitiPower's network in the 2011-15 regulatory control period is growth related. That is, the expenditure is driven by the need to augment and expand the network to adequately meet peak summer demand and provide for the connection of new customers.

As a consequence, the management of summer demand has a high priority in CitiPower's tariff reform strategies. This leads to an emphasis on providing network price signals that will encourage both residential and business customers to moderate their consumption by the following means:

- The price levels of existing tariff structures;
- The development of more efficient tariff structures; and
- The development of innovative new tariff structures.

5.4 Network tariff strategy

CitiPower has a pricing strategy that will, within the limitations of metering arrangements and efficient tariff structures, signal the costs associated with increased demand placed on the network.

Consistent with the network tariff objectives outlined in section 5.2 of this Pricing Proposal, CitiPower's network tariff strategy aims to:

- Attain revenue sufficiency under the WAPC;
- Signal the long run marginal cost of supply through its network tariffs; and
- Pass on the cost of designated pricing proposal charges, jurisdictional scheme(s) and other approved pass through costs to customers.

5.5 Future tariff reform options

The following network tariff reforms may be pursued by CitiPower during the 2011-15 regulatory control period:

- Improving the design of the ToU tariffs, to enhance their efficiency;
- Strengthening the signal of the single-rate inclining block structure as a '*second best*' option to ToU pricing where AMI meters are not available; and
- Develop tariff structures to take advantage of the rich data available through AMI.

CitiPower notes that the Victorian Government has requested a moratorium on network tariff changes that were proposed at the time of rolling out AMI meters. CitiPower has agreed to this request but signals that once the moratorium is lifted that a progressive reassignment of customers to AMI related tariffs will take place.

These proposed initiatives are all intended to improve the efficiency of the existing tariffs and whilst involving the reassignment of customers to new tariffs during the regulatory control period, would not require their reassignment to a new or different tariff class.

5.6 Expected DUoS price trends 2011 - 2015

For tariffs in place at the commencement of the 2011-15 regulatory control period, CitiPower's tariff strategy and its focus on managing demand, leads to the indicative relative charging parameters summarised in section 4 of this Pricing Proposal. The actual price movements each year will remain subject to review at the time, following consideration of the objectives set out in section 5.2 of this Pricing Proposal.

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Distribution tariff class and tariff	Fixed charge	First block rate	Upper blocks rates	Peak energy rate	Shoulder energy rate	Off peak energy rate	Demand rate
Residential							
Residential flat rate		↓	↑				
Residential ToU rate		↓	↑	↑	↔ *	↓	
Controlled load						↓	
Small Business							
Small business flat rate		↓	↑				
Small business ToU rate		↓	↑	↑	↔ *	↓	
Large Low voltage business							
LLV business rate				↑		↔	↑
High Voltage business							
HV business rate				↓		↔	↑
Subtransmission business							
Subtransmission rate				↓		↔	↑

Table 14 - Indicative relative charging parameter movement in the 2011-15 regulatory control period

Table 14 Legend

- ↑ increase relative to the average distribution price movement permitted in the AER's Final Decision.
 - ↓ decrease relative to the average distribution price movement permitted in the AER's Final Decision.
 - ↔ no anticipated change relative to the average distribution price movement permitted in the AER's Final Decision.
- A blank cell indicates that the corresponding charging parameter is not applicable for a particular tariff.

* Pending the development of AMI tariffs

This is in accordance with the requirements of clause 6.18.9(a)(3) of the Rules.

6 Standard control services tariffs

Within the framework of CitiPower's longer term tariff strategy set out in Chapter 5 of this Pricing Proposal, this section sets out the proposed rates for tariffs charging components of standard control services for 2012 and provides a comparison with the rates in place during 2011.

It should be noted that the information and comparisons in this section relate solely to distribution charges. CitiPower's final network charges are bundled charges that contain designated pricing proposal charges cost recovery components and recovery of jurisdictional scheme amounts.

A discussion of customer impacts including the designated pricing proposal charges cost recovery and recovery of jurisdictional scheme amounts is set out in chapter 9 and chapter 10 of this Pricing Proposal.

6.1 Regulatory Requirements

The information in this section concerning the change in standard control service rates is provided pursuant to the following Rules.

6.18.2 Pricing proposals

- (b) A pricing proposal must:
 - (8) describe the nature and extent of change from the previous *regulatory year* and demonstrate that the changes comply with the *Rules* and any applicable distribution determination.

6.18.9 Publication of information about tariffs and tariff classes

- (a) A *Distribution Network Service Provider* must maintain on its website:
 - (3) a statement of expected price trends (to be updated for each *regulatory year*) giving an indication of how the *Distribution Network Service Provider* expects prices to change over the *regulatory control period* and the reasons for the expected changes.

6.2 Calculation of use of system tariffs

The information in Appendix C outlines the DUoS component of CitiPower's existing tariffs and the price movement proposed for 2012. It should be noted that this information is provided for the purpose of showing the relative change in the price of each tariff charging parameter. Compliance with clause 6.18.2(b)(8) of the Rules, concerning the demonstration that price changes comply with the Rules and the AER's Final Decision, is demonstrated in Chapter 8 of this Pricing Proposal.

7 Customer Impacts

In this chapter, customer impacts are calculated using CitiPower's proposed tariffs. The use of these network tariffs results in customer impacts that include the following components:

- DUoS charges, for CitiPower's standard control services;
- Designated pricing proposal charges cost recovery tariffs, to recover costs associated with standard control services; and
- Recovery of jurisdictional scheme amounts.

All of the customer impacts presented in this chapter are GST exclusive.

This chapter provides an indication of how the price trends of tariffs may be expected to change over the 2011-15 regulatory control period.

This chapter also sets out how CitiPower will comply with the AER's requirement for a system of tariff review, where the charge varies according to the usage or load profile of a customer.

7.1 Regulatory Requirements

7.1.1 Rules requirements

The following Rules clauses impose a requirement for the Pricing Proposal to set out the nature of variations which may take place during 2012.

6.18.2 Pricing proposals

- (b) *A pricing proposal* must:
 - (5) set out the nature of any variation or adjustment to the tariff that could occur during the course of the *regulatory year* and the basis on which it could occur;

6.18.4 Principles governing assignment or re-assignment of customers to tariff classes and assessment and review of basis of charging

- (b) If the *charging parameters* for a particular tariff result in a basis of charge that varies according to the usage or load profile of the customer, a distribution determination must contain provisions for an effective system of assessment and review of the basis on which a customer is charged.

7.1.2 Requirements of the AER's Final Decision

The following extract from Appendix G of the AER's Final Decision contains the following requirements based on clause 6.18.4(b) of the Rules, concerning the review of tariffs where the charge varies according to the usage or load profile of a customer.

System of assessment and review of the basis on which a customer is charged

12. Where the charging parameters for a particular tariff result in a basis of charge that varies according to the customer's usage or load profile, the Victorian DNSP must set out in its pricing proposal a method of how it will review and assess the basis on which a customer is charged.

13. If the AER considers that the method provided under section 11 does not provide for an effective system of assessment and review of the basis on which a customer is charged, the AER may request additional information or request that the relevant Victorian DNSP submit a revised method.
14. If the AER considers the DNSP's method for reviewing and assessing the basis on which a customer is charged, provided in accordance with section 11 of this appendix, is not reasonable it will advise the DNSP in writing.

7.2 Variations to prices

Clause 6.18.2(b)(5) requires CitiPower to set out the nature of any variations and adjustments that could occur to tariffs during the course of the 2011 year.

Variations to the determination during the course of the 2011-15 regulatory control period could result in the adjustment of network tariffs from the X-Factor price trends set out in Table 2 of this Pricing Proposal. Those variations that are reasonably foreseen would arise from the following effects:

- The cost recovery of a Jurisdictional Scheme;
- The cost recovery of a designated pricing proposal charge (DPPC);
- License fees (L Factor);
- Service target performance incentive scheme (STPIS);
- Consumer Price Index (CPI);
- Approved pass through amounts; and
- Outcomes arising from relevant appeals to the Australian Competition Tribunals or other judicial body.

The extent of these variations to price during the course of the 2011-15 regulatory control period will depend on a number of factors, including CitiPower's performance as measured against the parameters of the AER's incentive schemes.

With regard to network price variations that could occur during the 2012 year, network prices will be established in accordance with this Pricing Proposal for implementation on 1 January 2012. Prices are not expected vary throughout the year.

The average price trends mask the variation in price that can take place for individual customers. Each customer's price will vary depending upon their level of consumption, and for large business customers, the load profile and monthly demand.

7.3 Review of customer charges

Pursuant to clause 6.18.4(b) of the Rules, the AER has set out the requirement for a system of assessment and review of the basis on which a customer is charged where the charge varies with the customer's usage or profile. This requirement is in Appendix G of the Final Decision.

CitiPower has in place a process whereby customers, retailers, consultants or network managers will request that a customer be reassigned to a more appropriate tariff based upon the review of a customer's connection characteristics, profile or usage patterns.

Often it is the external or knowledgeable parties who become aware of changes in customer's circumstances that will trigger the need for review of tariffs.

Requests for changes are received throughout the year and are assessed based on the information provided.

For small customers the request for a tariff change is often received from the retailer, for larger customers a request is often in the form of a demand reset which is assessed against the demand reset policy outlined in section 6.6 of the deemed distribution contract.⁴

CitiPower considers that this process complies with the requirement of clause 12 of Appendix G of the AER's Final Decision in formulating the 2012 network prices.

⁴ *'Deemed Electricity distribution contract'*, Victorian Government Gazette, 11 January 2007

8 Pricing of standard control services

This section demonstrates how CitiPower's network tariffs for 2012 comply with the requirements of the Rules and the AER's Final Decision in respect of the pricing X factors, side constraints and pricing principles.

8.1 Regulatory requirements

8.1.1 Rules requirements

Rules clause 6.18.2(b)(4) specifies that CitiPower's Pricing Proposal must contain information concerning the expected revenue to be derived from its tariff classes and tariffs, as follows.

6.18.2 Pricing proposals

- (b) *A pricing proposal* must:
 - (4) set out, for each *tariff class* related to *standard control services*, the expected weighted average revenue for the relevant *regulatory year* and also for the current *regulatory year*; and

In setting its prices for standard control services, clause 6.18.5 of the Rules requires CitiPower to comply with the following pricing principles.

6.18.5 Pricing principles

- (a) For *each tariff class*, the revenue expected to be recovered should lie on or between:
 - (1) an upper bound representing the stand alone cost of serving the customers who belong to that class; and
 - (2) a lower bound representing the avoidable cost of not serving those customers.
- (b) A tariff, and if it consists of 2 or more *charging parameters*, each *charging parameter* for a *tariff class*:
 - (1) must take into account the long run marginal cost for the service or, in the case of a *charging parameter*, for the element of the service to which the *charging parameter* relates; and
 - (2) must be determined having regard to:
 - (i) transaction costs associated with the tariff or each *charging parameter*; and
 - (ii) whether customers of the relevant *tariff class* are able or likely to respond to price signals.
- (c) If, however, as a result of the operation of paragraph (b), the *Distribution Network Service Provider* may not recover the expected revenue, the provider must adjust its tariffs so as to ensure recovery of expected revenue with minimum distortion to efficient patterns of consumption.

In respect of pricing side constraints, CitiPower is required to comply with clause 6.18.6 of the Rules.

6.18.6 Side constraints on tariffs for standard control services

- (a) This clause applies only to *tariff classes* related to the provision of *standard control services*.
- (b) The expected weighted average revenue to be raised from a *tariff class* for a particular *regulatory year* of a *regulatory control period* must not exceed the corresponding expected weighted average revenue for the preceding *regulatory year* by more than the permissible percentage.
- (c) The permissible percentage is the greater of the following:
 - (1) the CPI-X limitation on any increase in the *Distribution Network Service Provider's* expected weighted average revenue between the two *regulatory years* plus 2%;
Note:
The calculation is of the form $(1 + \text{CPI})(1 - X)(1 + 2\%)$
 - (2) CPI plus 2%.
Note:
The calculation is of the form $(1 + \text{CPI})(1 + 2\%)$
- (d) In deciding whether the permissible percentage has been exceeded in a particular *regulatory year*, the following are to be disregarded:
 - (1) the recovery of revenue to accommodate a variation to the distribution determination under rule 6.6 or 6.13;
 - (2) the recovery of revenue to accommodate pass through of *designated pricing proposal charges* to customers; and
 - (3) the recovery of revenue to accommodate pass through of *jurisdictional scheme amounts* for *approved jurisdictional schemes*..
- (e) This clause does not, however, limit the extent a tariff for customers with remotely-read interval metering or other similar metering technology may vary according to the time or other circumstances of the customer's usage.

8.1.2 Requirements of the AER's Final Decision

The principal elements of the AER's determination are set out in its Final Decision and form the major determinants of prices for standard control services during the 2011-15 regulatory control period:

Chapter 4 - Pricing control mechanism

Side constraint requirements

These elements of the AER's Final Decision have been set out in section 2.3 of this Pricing Proposal.

CITIPower PTY'S 2012 PRICING PROPOSAL

In addition, the provisions of Appendix E to the AER's Final Decision, concerning changes to tariff structures, must be met.

8.2 2012 prices for standard control services

The fundamental pricing criteria that CitiPower has factored into this Pricing Proposal are summarised in the following table.

Criterion	2012 value
Consumer Price Index	3.52%
X Factor ⁵	(4.00)%
L Factor	(0.03)%
S Factor	0.00%
WAPC (1+CPI) x (1-X) x (1+S) x (1+L)	7.63%

Table 15 - Summary of fundamental pricing criteria

The derivation of the WAPC constraint is presented in the AER's annual tariff model template provided for this purpose.

8.3 Compliance with the Weighted Average Price Cap

The AER's WAPC model has been used for the purposes of demonstrating compliance with the provisions of the WAPC. This model is submitted as Appendix J and forms part of this Pricing Proposal.

The prices and side constraints for 2012 are based on 2010 volumes, projected using the WAPC formulae and X factors determined by the AER.

A summary of the tariff class network revenue is presented in the following table.

2012 Distribution price control	P _{t-1} Q _{t-2} \$'000	P _t Q _{t-2} \$'000	Change in weighted average revenue %
Distribution Tariff Revenue	207,397	223,227	7.63%

Table 16 - Weighted Average Revenue

Table 16 demonstrates that CitiPower's 2012 network Pricing Proposal complies with the WAPC constraints indicated in Table 15 above.

The table also satisfies clause 6.18.2(b)(4) of the Rules.

⁵ Negative values represent a real price increase

8.4 Tariff class side constraints

8.4.1 Tariff class movement side constraint

The side constraint formula that the AER has determined for CitiPower has been set out in section 2.3 of this Pricing Proposal. The evaluation of the side constraint for 2011 is set out in Table 17 and Table 18.

Criterion	2012 value
Consumer Price Index	3.52%
X Factor	(4.00)%
L Factor	(0.03)%
S Factor	0.00%
Side constraint $(1+CPI) \times (1-X) \times (1+S) \times (1+L) \times (1+2\%)$	9.79%

Table 17 - Summary of side constraint criteria

The AER's annual tariff model has been used for the purposes of demonstrating compliance with the provisions of the side constraint (refer to Appendix J). A summary of the tariff class revenue and price changes is presented in Table 18.

Tariff class	2011 $P_{t-1}Q_{t-2}$ \$'000	2012 P_tQ_{t-2} \$'000	Change in weighted average revenue %	Side constraint %
Residential	59,589	63,751	6.98%	9.79%
Non-Residential	87,348	94,975	8.73%	9.79%
Large Low Voltage	50,476	53,850	6.68%	9.79%
High voltage	9,260	9,879	6.68%	9.79%
Subtransmission	724	772	6.68%	9.79%

Table 18 - Compliance with the side constraint

Table 18 demonstrates CitiPower's compliance with the provisions of clause 6.18.6 of the Rules and the AER's side constraint formula.

8.5 Compliance with pricing principles

This section demonstrates CitiPower's compliance with the pricing principles set out in clause 6.18.5 of the Rules, which requires CitiPower to ensure that the revenue recovered for each tariff class lies between:

- An upper bound, representing the stand-alone cost of serving the customers who belong to that class; and
- A lower bound, representing the avoidable cost of not serving those customers.

The Stand-alone and Avoidable cost methodologies are described in detail in Appendix I (confidential) of this Pricing Proposal. These approaches are used to calculate the revenues for each standard control services tariff class associated with each cost methodology. These costs are compared with the weighted average revenue derived from CitiPower's proposed tariffs. The associated calculations are included as Appendix H (confidential).

8.5.1 Definition of Stand-alone and Avoidable costs

These two categories of cost may be defined as follows:

- The *Stand-alone cost* of serving a tariff class is defined as the cost of developing and operating distribution infrastructure in order to serve the tariff class in question. Standalone cost is a forward looking concept and considers the costs of entry based on current market conditions and technology. Where the network business recovers more revenue than the standalone cost of serving a tariff class, it follows that a hypothetical alternate supplier may enter the market and supply that particular tariff class. Prices above the standalone cost could not therefore be sustained in an effectively competitive market and may create the possibility of efficient bypass of the existing infrastructure; and
- The *Avoidable cost* for a tariff class is defined as the cost that would be avoided should the distribution business no longer serve that specific tariff class (whilst all other tariff classes remained supplied). If a tariff class were to be charged below the avoidable cost, it would be economically beneficial for the business to stop supplying that tariff class as the associated costs would exceed the revenue obtained from the customer. Further, where avoidable costs are higher than revenue recovered, the associated tariff levels may also result in inefficient levels of consumption, which therefore provides a rationale for having avoidable costs as a lower bound.

There are two alternative concepts that could be used to calculate these costs:

- To ignore the sunk nature of the existing network and estimate the costs which would be associated with an optimally designed network, constructed to supply standard control services to the tariff class(es) concerned; or
- To base the estimation of costs on existing network configuration, to provide standard control services to the tariff class(es) concerned.

The Rules do not prescribe the methodology that should be used to calculate the Stand-alone and Avoidable costs of tariff classes of the network. CitiPower has chosen to base its cost estimations on the second concept, with hypothetical modification of the existing network, rather than by devising and costing optimal new network structures. This has been done for two reasons:

- To avoid the very substantial resource requirements that would be involved in a full network redesign; and
- In recognition that the economic regulatory framework for distribution supports the existence and value of existing (sunk) network investments and does not support the optimisation of existing networks.

8.6 Stand-alone costs

Standalone costs comprise both the capital and operating costs of service provision. The stand-alone network capital cost for each tariff class was derived from an estimate of the proportions of the cost of providing network infrastructure that would need to remain in place to service the load in each of the tariff classes in turn if the other tariff classes were no longer required to be supplied. The standalone operating cost for a tariff class has been estimated as the total of all operating cost less the avoidable operating costs of serving all the other tariff classes.

8.7 Avoidable costs

In similar manner to the stand-alone cost, the avoidable cost associated with each of the tariff classes were derived from an estimate made of the network cost that could be avoided, in the event that each of the tariff classes were no longer served.

8.8 Compliance with Rules clause 6.18.5(a)

The revenue expected to be recovered from each of CitiPower's tariff classes in 2012 is compared with the stand-alone and avoidable costs calculated in sections 8.6 and 8.7, in the following table.

Tariff class	Avoidable cost \$000, (nominal)	Tariff revenue \$000, (nominal)	Stand-alone cost \$000, (nominal)
Residential	46,175	64,492	156,611
Non-Residential	58,149	96,660	153,677
Large Low Voltage	19,021	56,947	84,299
High voltage	1,531	7,826	52,901
Subtransmission	183	812	37,313

Table 19 - Stand-alone and avoidable distribution network costs (\$'000)

8.9 Long Run Marginal Costs

LRMC is a measure of the change in the forward looking costs as output increases when all factors of production including plant and equipment are variable. The LRMC will relate broadly to the annualised cost of augmenting capacity (in case of electricity, at a particular voltage, at a particular location, at a particular time), generally per unit of additional capacity provided.

CitiPower has therefore estimated its LRMC for each tariff class by annualising its cost of augmenting capacity (measured by the marginal cost of reinforcement) and scale growth in operating and maintenance costs associated with network augmentation, per unit of additional capacity provided (MVA).

A comparison of the stand-alone, avoidable, LRMC and 2012 tariff rates for CitiPower's tariff classes is shown in following Figure 2⁶.

⁶ The stand-alone, 2012 tariff and avoidable tariff class rates are expressed as their \$ contribution divided by the forecast coincident peak kVA for CitiPower's system demand in 2012, with a 10% PoE.

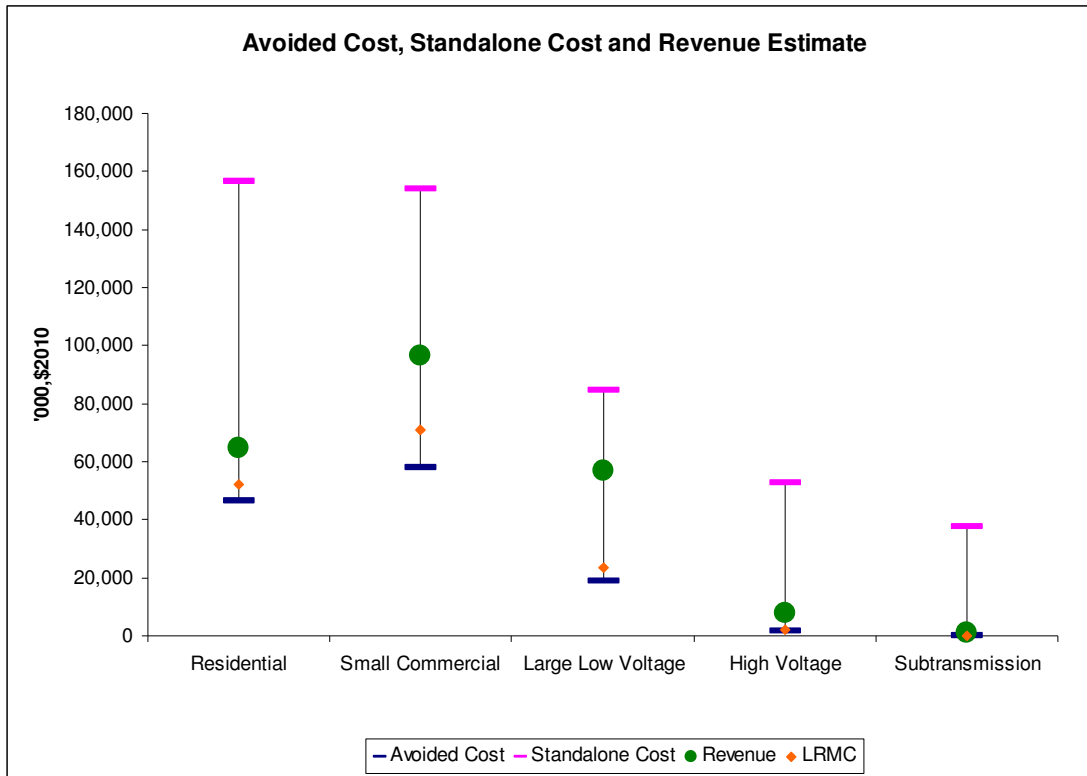


Figure 2 - Cost comparison (\$/kVA per annum)

It can be noted that:

- The 2012 prices for each network tariff class fall well within the bounds of the stand-alone and avoidable costs and hence are subsidy-free; and
- The LRMC of each tariff class determined from the approach described above yields a cost that does not vary greatly from that expected to be recovered through the 2012 prices in the case of the major business and high voltage business tariff classes.

8.9.1 Application of the LRMC to price formulation

As required by clauses 6.18.5(b)(1) and 6.18.5(c) of the Rules, CitiPower has taken into account the calculated values of LRMC, in establishing the charging parameters for each of CitiPower’s 2012 network tariffs.

Charging parameters of tariffs that are related to volume may be expected to influence customers’ consumption decisions. Those parameters are:

- Monthly demand;
- Peak period energy; and
- To a much less significant extent, anytime energy.

CitiPower notes that the LRMC is less than the expected revenue for each tariff class. This indicates that tariffs are set in such a way that there is no concern to be raised regarding cross subsidies across tariff classes.

CitiPower’s 2012 tariffs have therefore been established in compliance with the provisions of clauses 6.18.5(b)(1) and 6.18.5(c) of the Rules.

8.10 Transaction costs

Clause 6.18.5(b)(2)(i) of the Rules requires CitiPower have regard to the transaction costs arising from its network tariffs, by limiting the complexity of tariff structures and the number of charging parameters within each tariff. The charging parameters applicable to each tariff are provided in section 4 of this Pricing Proposal.

CitiPower is not proposing to introduce new tariffs or tariff structures in 2012 and thus transaction costs will not increase as a result of the implementation of these prices. CitiPower is therefore compliant with this Rules provision.

8.11 Customer response to price signals

In accordance with clause 6.18.5(b)(2)(ii) of the Rules, CitiPower is required to have regard to the ability of customers to respond to the price signals provided by its network tariffs. The efficiency gains of marginal cost pricing are realised when a tariff based on the marginal cost of supply induces the customer to make behavioural change.

To the extent possible within the limitations imposed by network tariff structures and metering constraints, CitiPower signals the long run marginal cost of supply through those tariff charging parameters with the greatest price elasticity of demand, namely the variable consumption charges that are based on the customers energy use and maximum demand.

In relation to the operation of clause 6.18.5(c) of the Rules, it is noted that CitiPower's current estimate of LRMC falls above all of the price signalling charging parameters in each tariff class, as described in section 8.9 of this Pricing Proposal.

If the price signalling charging parameters alone (which were set taking into account the LRMC) were used, the revenue for each tariff class would be insufficient to recover the expected revenue. The revenue shortfall is recovered through the use of tariff components which would cause minimal distortion in efficient patterns of consumption, namely:

- Fixed charges; and
- Anytime energy charges during off peak periods.

CitiPower is therefore compliant with this Rules provision.

9 Designated pricing proposal charges

This section sets out the procedures that CitiPower will follow to enable the recovery of transmission related charges, it does not include the recovery of the following costs:

- transmission connection;
- avoided transmission use of system (TUoS); and
- inter DNSP charges.

Recovery of these costs are addressed as pass through amounts, these will not come into effect until the 2012 tariff application.

9.1 Regulatory Requirements

9.1.1 Rules requirements

The Rules requirements pertaining to Pricing Proposals that apply to transmission use of system services are as follows;

6.18.2 Pricing proposals

- (b) A *pricing proposal* must:
- (2) set out the proposed tariffs for each *tariff class*; and
 - (3) set out, for each proposed tariff, the *charging parameters* and the elements of service to which each *charging parameter* relates; and
 - (6) set out how *designated pricing proposal charges* are to be passed on to customers and any adjustments to tariffs resulting from over or under recovery of those charges in the previous *regulatory year*; and

6.18.7 Recovery of designated pricing proposal charges

- (a) A pricing proposal must provide for tariffs designed to pass on to customers the designated pricing proposal charges to be incurred by the Distribution Network Service Provider for transmission use of system services.
- (b) The amount to be passed on to customers for a particular *regulatory year* must not exceed the estimated amount of the *designated pricing proposal charges* adjusted for over or under recovery in accordance with paragraph (c).
- (c) The over and under recovery amount must be calculated in a way that:
 - (1) subject to subparagraphs (2) and (3) below, is consistent with the method determined by the AER in the relevant distribution determination for the *Distribution Network Service Provider*;
 - (2) ensures a *Distribution Network Service Provider* is able to recover from customers no more and no less than the *designated pricing proposal charges* it incurs; and

- (3) adjusts for an appropriate cost of capital that is consistent with the rate of return used in the relevant distribution determination for the relevant *regulatory year*.
- (d) Notwithstanding anything else in this clause 6.18.7, a *Distribution Network Service Provider* may not recover charges under this clause to the extent these are:
 - (1) recovered through the Distribution Network Service Provider's annual revenue requirement;
 - (2) recovered under clause 6.18.7A; or
 - (3) recovered from another *Distribution Network Service Provider*.

9.1.2 Requirements of the AER's Final Decision

In its Final Decision the AER outlines a methodology for the recovery of transmission cost in section 4.4.2.

The format required for the details of calculations is set out in Appendix F of the Final Decision. The amounts provided for the most recently completed regulatory year (t-2) must be audited and the amounts for the current and next regulatory year will be regarded as estimates and forecast respectively.

CitiPower submits in this pricing proposal that the changes to the NER to address recover of designated pricing proposal charges encapsulates the recovery of transmission use of system services and that the recovery in accordance within the most recent version of the NER supersedes the EDPR requirements.

9.2 Maximum transmission revenue control

In accordance with Appendix F of the AER's Final Decision, 6.18.2(b)(6) and 6.18.7 of the Rules, Appendix E provides the information specific to compliance with these requirements.

This same control mechanism will be used for the recovery of designated pricing proposal charges rather than just transmission use of system services.

The total designated pricing proposal service charges allocated to network tariffs aligns with the total estimated designated pricing proposal charges to be paid by CitiPower, adjusted for any prior period corrections and adjusted for the time value of money.

9.3 Designated pricing proposal charges tariffs for 2012

CitiPower has prepared prices for 2012 that recover the forecast designated pricing proposal charges and 2011 disallowed costs. Customers have had prices applied on a non-locational basis. The billing parameters available for that customer segment and the customer demand assumptions for that customer segment. For example, business customers on a demand tariff will incur a mixture of demand and energy charges for designated pricing proposal charges, whilst residential and small business customers will incur an energy-based charge.

Designate pricing proposal charges are indicated separately in CitiPower's tariff schedule provided as Appendix A to this Pricing Proposal.

10 Recovery of Jurisdictional Scheme Amounts

For the purposes of Victorian Regulation a jurisdictional scheme is a premium feed-in tariff scheme per the '*Electricity Industry Amendment (Premium Solar Feed-in Tariff) Act 2009 (Vic)*' (clause 6.18.7A(e)(1)(iv)).

This section outlines the requirements and obligations in relation to the recovery of amounts relating to the jurisdictional scheme.

10.1 Regulatory Requirements

10.1.1 Rules requirements

The Rules requirement in relation to jurisdictional schemes are as follows:

6.18.2 Pricing proposals

- (b) A *pricing proposal* must:
 - (6A) set out how *jurisdictional scheme* amounts for each *approved jurisdictional scheme* are to be passed on to customers and any adjustments to tariffs resulting from over or under recovery of those amounts; and
 - (6B) describe how each *approved jurisdictional scheme* that has been amended since the *last jurisdictional scheme approval date* meets the *jurisdictional scheme eligibility criteria*;

6.18.6 Side constraints on tariffs for standard control services

- (d) In deciding whether the permissible percentage has been exceeded in a particular *regulatory year*, the following are to be disregarded:
 - (3) the recovery of revenue to accommodate pass through of *jurisdictional scheme amounts* for *approved jurisdictional schemes*.

6.18.7A Recovery of jurisdictional scheme amounts

Pricing Proposal

- (a) A *pricing proposal* must provide for tariffs designed to pass on to customers a *Distribution Network Service Provider's jurisdictional scheme amounts* for *approved jurisdictional schemes*.
- (b) The amount to be passed on to customers for a particular *regulatory year* must not exceed the estimated amount of *jurisdictional scheme amounts* for a *Distribution Network Service Provider's approved jurisdictional schemes* adjusted for over or under recovery in accordance with paragraph (c).
- (c) The over and under recovery amount must be calculated in a way that:
 - (1) subject to subparagraphs (2) and (3) below, is consistent with the method determined by the AER for *jurisdictional scheme amounts* in the relevant distribution determination for the *Distribution Network Service Provider*, or where no such method has been determined, with the method determined by

the *AER* in the relevant distribution determination in respect of *designated pricing proposal charges*;

- (2) ensures a *Distribution Network Service Provider* is able to recover from customers no more and no less than the *jurisdictional scheme amounts* it incurs; and
- (3) adjusts for an appropriate cost of capital that is consistent with the rate of return used in the relevant distribution determination for the relevant *regulatory year*.

Jurisdictional schemes

- (d) A scheme is a *jurisdictional scheme* if:
 - (1) the scheme is specified in paragraph (e); or
 - (2) the *AER* has determined under clause paragraph (l) that the scheme is a *jurisdictional scheme*,
and the *AER* has not determined under paragraph (u) that the scheme has ceased to be a *jurisdictional scheme*.
- (e) For the purposes of paragraph (d)(1), the following schemes are *jurisdictional schemes*:
 - (1) schemes established under the following laws of participating jurisdictions:
 - (i) Electricity Feed-in (Renewable Energy Premium) Act 2008 (ACT);
 - (ii) Division 3AB of the Electricity Act 1996 (SA);
 - (iii) Section 44A of the Electricity Act 1994 (Qld);
 - (iv) Electricity Industry Amendment (Premium Solar Feed-in Tariff) Act 2009 (Vic);
 - (2) the Solar Bonus Scheme established under the Electricity Supply Act 1995 (NSW); and
 - (3) the Climate Change Fund established under the Energy and Utilities Administration Act 1987 (NSW).

AER Requested to determine that scheme is a jurisdictional scheme

- (f) Any person may request the *AER* to determine whether a scheme is a *jurisdictional scheme*.
- (g) A request made under paragraph (f) must contain the following information:
 - (1) the name and address of the person making the request;
 - (2) details of the law of a *participating jurisdiction* under which the relevant scheme is established;
 - (3) the commencement date of the relevant scheme; and
 - (4) an explanation of how the relevant scheme meets the *jurisdictional scheme eligibility criteria*.

- (h) The *AER* must as soon as practicable after receiving the request under paragraph (f) *publish* the request.

AER may assess whether a scheme is a jurisdictional scheme

- (i) The *AER* may at any time initiate an assessment of whether a scheme is a *jurisdictional scheme*.
- (j) If the *AER* decides to initiate an assessment under paragraph (i) it must *publish* details of the scheme it is considering and the reasons for initiating the assessment.

AER to determine whether a scheme is a jurisdictional scheme

- (k) Before making a determination under paragraph (l), the *AER* may consult with the relevant *Distribution Network Service Provider* and such other persons as the *AER* considers appropriate, on any matters arising out of the request or the assessment the *AER* considers appropriate.
- (l) The *AER* must within 20 *business days* of:
- (1) receiving a request under paragraph (f); and
 - (2) *publishing* details of an assessment under paragraph (j),
- determine in accordance with paragraph (n) if the relevant scheme is a *jurisdictional scheme* and *publish* its decision (including the reasons).
- (m) The *AER* may extend the time limit fixed in paragraph (l) if it considers that the difficulty of assessing whether a scheme is a *jurisdictional scheme*, or the complexity of the issues raised during any consultation under paragraph (k), justifies the extension.
- (n) The *AER* must only determine that a scheme is a *jurisdictional scheme* under paragraph (l) if it considers that the scheme meets the *jurisdictional scheme eligibility criteria*.

AER requested to determine that scheme should cease to be a jurisdictional scheme

- (o) Any person may request the *AER* to determine that a scheme is no longer a *jurisdictional scheme*.
- (p) A request made under paragraph (o) must contain the following information:
- (1) the name and address of the person making the request;
 - (2) the law of a *participating jurisdiction* under which the relevant scheme is established;
 - (3) the commencement date of the relevant scheme; and
 - (4) an explanation of why the scheme no longer meets the *jurisdictional scheme eligibility criteria*.
- (q) The *AER* must as soon as practicable after receiving the request under paragraph (o) *publish* the request.

AER may assess whether a scheme should cease to a jurisdictional scheme

- (r) The *AER* may at any time consider whether a scheme should cease to be a *jurisdictional scheme*.
- (s) If the *AER* decides to initiate an assessment of whether a scheme should cease to be *jurisdictional scheme* under paragraph (r) it must *publish* details of the scheme it is considering and the reasons for initiating the assessment.

AER to determine whether a scheme should cease to be a jurisdictional scheme

- (t) Before making a determination under paragraph (u), the *AER* may consult with the relevant *Distribution Network Service Provider* and such other persons as the *AER* considers appropriate, on any matters arising out of the request or the assessment the *AER* considers appropriate.
- (u) The *AER* must within 20 *business days* of:
 - (i) receiving a request under paragraph (o); or
 - (ii) *publishing* details of an assessment under paragraph (s),determine in accordance with paragraph (w) if the relevant scheme should cease to be a *jurisdictional scheme* and *publish* its decision (including the reasons).
- (v) The *AER* may extend the time limit fixed in paragraph (u) if it considers that the difficulty of assessing whether a scheme should cease to be a *jurisdictional scheme*, or the complexity of the issues raised during any consultation under paragraph (t), justifies the extension.
- (w) The *AER* must only determine that a scheme has ceased to be a *jurisdictional scheme* under paragraph (u) if it considers that the scheme no longer meets the *jurisdictional scheme eligibility criteria*.

Jurisdictional scheme eligibility criteria

- (x) The following are the *jurisdictional scheme eligibility criteria*:
 - (1) the *jurisdictional scheme obligations* require a *Distribution Network Service Provider* to:
 - (i) pay a person;
 - (ii) pay into a fund established under an Act of a *participating jurisdiction*;
 - (iii) credit against charges payable by a person; or
 - (iv) reimburse a person,
an amount specified in, or determined in accordance with, the *jurisdictional scheme obligations*;

- (2) the *jurisdictional scheme obligations* are imposed on a *Distribution Network Service Provider* in its capacity as a *Distribution Network Service Provider*;
- (3) the amount referred to in subparagraph (1) is not in the nature of a fine, penalty or incentive payment for the *Distribution Network Service Provider*; and
- (4) except as provided in these Rules, the *Distribution Network Service Provider* has no right to recover the amount referred to in subparagraph (1) from any person.

10.1.2 Requirements of the AER's Final Decision

Section 16.6.7 the Final Decision confirms the NER rule changes as the instrument for the recovery of costs attributable to a Jurisdictional Scheme. Appendix F of the Final Decision provides the mechanism to recover these costs.

10.2 Jurisdictional scheme eligibility

In accordance with the rule requirement clause 6.18.7A(e)(1)(iv) CitiPower submits that the Victorian Premium Feed-in tariff (*PFiT*) scheme fulfils the criteria for eligibility as a jurisdictional scheme.

CitiPower notes the State Government's intention⁷ to create a new solar incentive to replace premium feed-in tariff.

CitiPower submits that the new scheme complies with the requirements of a jurisdictional scheme and therefore costs incurred as a result of this scheme should be recovered under section 6.18.7A of the NER.

10.3 Jurisdictional scheme cost recovery tariff methodology

The key principles of CitiPower's JSCR tariff methodology are:

- The total JSCR allocated to network tariffs aligns with the total estimated charge to be paid by CitiPower, adjusted for any overs and unders from previous regulatory years and also adjusted for the time value of money; and
- Charges are allocated to tariffs in a manner that reflects the customers that the scheme serves, namely residential and small business customers.

10.4 Overs and unders true up

In accordance with clause 6.18.7A(b) of the Rules and Appendix F of the Final Decision, CitiPower submits an approach to jurisdictional scheme which settles under and over recovery from previous years (Refer to Appendix F of this Pricing Proposal for the detailed calculations.)

⁷ "New solar incentive to replace premium feed-in tariff", Thursday, 01 September 2011, From the Minister for Energy and Resources, <http://www.premier.vic.gov.au/media-centre/media-releases/1856-new-solar-incentive-to-replace-premium-feed-in-tariff.html>

10.5 Charging parameters for JSCR tariffs

CitiPower's jurisdictional scheme recovery tariffs are included in the bundled NUoS rates. The charging parameters associated with jurisdictional scheme cost recovery tariffs are shown in sections 4.3 to 4.7 of this Pricing Proposal.

Jurisdictional scheme cost recovery amounts are billed at the same frequency as the relevant tariff for standard control services.

10.6 Jurisdictional scheme recovery tariffs for 2012

CitiPower's 2012 recovery through jurisdictional scheme tariffs is forecast to increase, which results from an increase in CitiPower's forecast jurisdictional scheme payments.

CitiPower has prepared prices for 2012 that recover the forecast jurisdictional scheme charges. Charges are applied on a non-locational basis.

Jurisdictional scheme charges are indicated separately in CitiPower's tariff schedule provided as Appendix A to this Pricing Proposal.

11 Customer tariff class assignment and reassignment

The requirements concerning the assignment and reassignment of customer to tariff classes are set out in clause 6.18.4 of the Rules and Chapter 2 and Appendix G of the AER's Final Decision.

11.1 Regulatory Requirements

11.1.1 Rules requirements

In making a distribution determination, the AER is required to formulate provisions for the assignment and reassignment of customers to tariff classes, in accordance with the principles set out in clause 6.18.4 of the Rules.

6.18.4 Principles governing assignment or re-assignment of customers to tariff classes and assessment and review of basis of charging

- (a) In formulating provisions of a distribution determination governing the assignment of customers to *tariff classes* or the re-assignment of customers from one *tariff class* to another, the AER must have regard to the following principles:
 - (1) customers should be assigned to *tariff classes* on the basis of one or more of the following factors:
 - (i) the nature and extent of their usage;
 - (ii) the nature of their *connection* to the *network*;
 - (iii) whether remotely-read interval metering or other similar metering technology has been installed at the customer's premises as a result of a *regulatory obligation or requirement*;
 - (2) customers with a similar *connection* and usage profile should be treated on an equal basis;
 - (3) however, customers with micro-generation facilities should be treated no less favourably than customers without such facilities but with a similar load profile;
 - (4) a *Distribution Network Service Provider's* decision to assign a customer to a particular *tariff class*, or to re-assign a customer from one *tariff class* to another should be subject to an effective system of assessment and review.
- (b) If the *charging parameters* for a particular tariff result in a basis of charge that varies according to the usage or load profile of the customer, a distribution determination must contain provisions for an effective system of assessment and review of the basis on which a customer is charged.

11.1.2 Requirements of the AER's Final Decision

In accordance with the principles in clause 6.18.4 of the Rules, Appendix G of the AER's Final Decision sets out the procedures to apply to assigning or reassigning customers to tariff classes. These provisions are in several parts, covering the following aspects:

- The initial assignment of customers at the commencement of the 2011-15 regulatory control period;
- Assignment of new customers to a tariff class during the next regulatory control period;
- Reassignment of existing customers to another existing or a new tariff during the next regulatory control period;
- Objections to proposed assignments and reassignments;
- System of assessment and review of the basis on which a customer is charged; and
- Installation of interval meters and assignment of customers to time of use (ToU) tariffs.

The initial assignment of existing standard control services customers to their existing tariffs was discussed in section 4.1.2. The remaining elements of the AER's Final Decision on tariff assignment and reassignment are set out below.

Assignment of new customers to a tariff class during the next regulatory control period

2. If, after 1 January 2011, a Victoria DNSP becomes aware that a person will become a customer of the DNSP, then the DNSP must determine the tariff class to which the new customer will be assigned.
3. In determining the tariff class to which a customer or potential customer will be assigned, or reassigned, in accordance with section 2 or 5 of this appendix, a DNSP must take into account one or more of the following factors:
 - (a) the nature and extent of the customer's usage
 - (b) the nature of the customer's connection to the network⁸
 - (c) whether remotely-read interval metering or other similar metering technology has been installed at the customer's premises as a result of a regulatory obligation or requirement.
 - (d) consistency with the AER's Interval Meter Reassignment Requirements
4. In addition to the requirements under section 3 of this appendix, a Victorian DNSP, when assigning or reassigning a customer to a tariff class, must ensure the following:

⁸ The AER interprets 'connection' to include the installation of any technology capable of supporting time based tariffs.

- (a) that customers with similar connection and usage profiles are treated equally
- (b) that customers which have micro-generation facilities are not treated less favourably than customers with similar load profiles without such facilities.

Reassignment of existing customers to another existing or a new tariff during the next regulatory control period

- 5. If a Victorian DNSP believes that an existing customer's load characteristics or connection characteristics (or both) have changed such that it is no longer appropriate for that customer to be assigned to the tariff class to which the customer is currently assigned or a customer no longer has the same or materially similar load or connection characteristics as other customers on the customer's existing tariff class, then it may reassign that customer to another tariff class.

Objections to proposed assignments and reassignments

- 6. A Victorian DNSP must notify the customer concerned in writing of the tariff class to which the customer has been reassigned by it, prior to the assignment or reassignment occurring.
- 7. The notice under section 6 of this appendix must include advice that the customer may request further information from the DNSP and that it may object to the proposed assignment or reassignment. This notice must specifically include:
 - a. either a copy of DNSP's internal procedures for reviewing objections or the link to where such information is available on DNSP's website
 - b. that if the objection is not resolved to the satisfaction of the customer under DNSP's internal review system, then to the extent that resolution of such disputes are within the jurisdiction of the Energy and Water Ombudsman (Victoria) the customer is entitled to escalate the matter to such a body
 - c. that if the objection is not resolved to the satisfaction of the customer under the DNSP's internal review system and the ombudsman scheme noted in clause 7.b, then the customer is entitled to seek a decision of the AER via the dispute resolution process available under Part 10 of the NEL.
- 8. If, in response to a notice issued in accordance with section 7 of this appendix, a Victorian DNSP receives a request for further information from a customer, then it must provide such information. If any of the information requested by the customer is confidential then it is not required to provide that information to the customer.
- 9. If, in response to a notice issued in accordance with section 7 of this appendix, a customer makes an objection to a Victorian DNSP about the proposed assignment or reassignment, the relevant Victorian DNSP must reconsider the proposed assignment or reassignment,

taking into consideration the factors in sections 3 and 4 above, and notify the customer in writing of its decision and the reasons for that decision.

10. If a customer's objection to a tariff class assignment or reassignment is upheld by the relevant body noted in clause 7.b and c, then any adjustment which needs to be made to tariffs will be done by the Victorian DNSP as part of the next annual review of prices.
11. If a customer objects to a Victorian DNSP about a tariff class assignment the DNSP must provide the information set out in paragraph 7 of this appendix and adopt and comply with the arrangements set out in paragraphs 8, 9 and 10 in respect of requests for further information by the customer and resolution of the objection.

System of assessment and review of the basis on which a customer is charged

12. Where the charging parameters for a particular tariff result in a basis of charge that varies according to the customer's usage or load profile, the Victorian DNSP must set out in its annual pricing proposal a method by which it will review and assess the basis on which a customer is charged.
13. If the AER considers that the method provided under section 11 of this appendix, does not provide for an appropriate system of assessment and review by the DNSP of the basis on which a customer is charged, the AER may, at any time, request additional information or request that the relevant Victorian DNSP submit a revised pricing method.
14. If the AER considers the DNSP's method for reviewing and assessing the basis on which a customer is charged, provided in accordance with section 11 of this appendix, is not reasonable it will advise the DNSP in writing.

Installation of interval meters and assignment of customers to time of use (TOU) tariffs

13. If a DNSP installs an interval meter for an existing distribution customer the DNSP may reassign that distribution customer to a TOU distribution tariff subject to clause 9.1.14 of the Victorian Electricity Distribution Code in accordance with the AER's Final decision: Interval Meter Reassignment Requirements published May 2009.

11.2 Assignment of new customers to a tariff class during the next regulatory control period

In this section of the Pricing Proposal, CitiPower describes the process it applies to the initial assignment of customers to tariff classes and to their reassignment. Notwithstanding that the individual tariffs have been grouped within tariff classes in this Pricing Proposal, the existing approach to managing tariff assignment and reassignment is demonstrated to align with the requirements established by the AER. Accordingly, no change is required to current practices.

The process whereby new customers are assigned to tariff classes and tariffs occurs following the receipt of a connection application by the customer or their retailer. In the application of this process, a customer that lodges an application to modify or upgrade an existing network connection is treated in the same manner as a new customer.

Customers are assigned to a tariff class and then to an individual tariff. The process relies upon a systematic sequence of decisions based on the information provided with the customer's application for supply.

The two major decisions that determine the tariff class assessment are as follows:

- The nature of a customer's usage: (ie: residential or business); and
- For business customers only, the nature and extent of the associated connection to the network (the connection voltage, ie: low voltage, large low voltage, high voltage and subtransmission).

The process employed by CitiPower therefore appropriately takes account the factors in clause 3(a) and 3(b) of Appendix G in the AER's Final Decision.

In the event that remotely-read interval metering or other similar metering technology is installed at the customer's premises as a result of a regulatory obligation or requirement during the 2011-15 regulatory control period, it is not anticipated that a reassignment of a customer to an alternative tariff class will be necessary. This addresses the requirements of clause 3(c) of AER's Appendix G in the AER's Final Decision.

11.2.1 Customers with micro-generation

As CitiPower's tariff class assignment process is applied to the *net* customer energy on the network, it does not distinguish between customers that have micro-generation and those without. The only aspects of the connection process that distinguish customers with micro-generation are technical requirements, principally to ensure public and employee safety in the event of disconnection of supply to a site with generation.

CitiPower's tariff assignment process therefore ensures that the requirements in clause 4(a) and 4(b) of Appendix G in the AER's Final Decision are met.

11.3 Reassignment of existing customers to another existing or a new tariff class during the next regulatory control period

Within each tariff class, there has been and will continue to be movement between individual tariffs. This is particularly the case with the customers on the Low Voltage Business tariff class. Whilst there has been no active review process by CitiPower to ensure that customers whose consumption and usage profiles change are maintained on the most advantageous tariff, customers are eligible to apply for transfer between tariffs and do so if it is to their advantage. This has been the case with business customers that have transferred from the energy based tariff to capacity based tariffs and between different capacity-based tariffs. CitiPower considers that preserving this level of flexibility to permit customers the option of transferring to a tariff more appropriate to their operations within a tariff class is of great importance to customers.

The tariff classes that CitiPower has established are sufficiently broad to ensure that all the existing customers are within the appropriate tariff class and that it is unlikely that customers will seek to migrate or be reclassified to a different tariff class during

the course of the determination. Transfer between tariff classes would be limited to circumstances where the nature of usage or level of consumption changed significantly, for example where a residence was redeveloped to become a small business such as a medical surgery or office.

Notwithstanding that the reassignment of customers' tariff classes is unlikely during the 2011-15 regulatory control period, CitiPower would do so in accordance with the provisions of the AER's Final Decision, in particular clause 5 of Appendix G.

11.3.1 Obsolete tariffs

In addition to the current tariffs, in common with most utilities, CitiPower has a range of obsolete tariffs. No new or modified customer connections will be assigned to these obsolete tariffs. Moreover, as the opportunity arises, customers will be transferred from obsolete tariffs to current tariffs within the same tariff class, with the longer-term objective being to transfer all customers away from the obsolete tariffs.

This is likely to be prevalent in the Victorian jurisdiction where the rollout of AMI metering is prevalent paving the way for the implementation of more efficient tariffs. Any such transfer will be made in accordance with the requirements of clause 3(d) and 4(b) of Appendix G in the AER's Final Decision are met.

When a customer is transferred from an obsolete tariff to one of the current tariffs, the choice of the appropriate tariff will follow the tariff assignment decision process in section 11.2 of this Pricing Proposal.

11.4 Objections to proposed assignments and reassignments

The AER has established requirements that CitiPower must follow in assigning or reassigning customers to tariff classes and in responding to objections to CitiPower's tariff class assignments. These are set out in the Final Decision as clauses 7 to 10 of Appendix G in the AER's Final Decision.

The requirements that CitiPower are outlined in the following sections.

11.4.1 Information provided to customers concerning tariff class assignment and Reassignment

Where CitiPower notifies customers of a tariff class assignment or reassignment, such notification will include the following advice that:

- The customer may request further information from CitiPower's Pricing Manager;
- The customer may object in writing to CitiPower's Pricing Manager concerning the proposed tariff class assignment;
- In the event that the customer is not satisfied with CitiPower's internal resolution of such an objection, the customer may be entitled to appeal to the Energy and Water Ombudsman (Victoria); and
- In the event that an objection is not resolved to the satisfaction of the customer under CitiPower's internal review system, then the customer is entitled to seek resolution via the dispute resolution process available under Part 10 of the NEL.

Upon receipt of a request for further information concerning a tariff class assignment or reassignment, CitiPower's Pricing Manager is to arrange the provision of relevant

information to the customer concerning the tariff class assignment or reassignment, provided that such information is not confidential.

11.4.2 Internal review process of tariff class assignment and reassignment

Upon receipt of an objection by a customer to a tariff class assignment or reassignment, CitiPower's Pricing Manager will reconsider the relevant tariff class assignment or reassignment, having regard to the following:

- The basis of the customer's objection;
- The principles for tariff class assignment and reassignment set out in clauses 6.18.3 and 6.18.4 of the Rules; and
- The procedures for tariff class assignment and reassignment set out in Appendix G, of the AER's Final Decision;

The Pricing Manager will notify the customer of the outcome of CitiPower's internal review and the reasons for accepting or rejecting the customer's objection to the tariff class assignment or reassignment. The notification by the Pricing Manager will also advise that:

- In the event that the customer is not satisfied with CitiPower's internal resolution of such an objection, the customer may be entitled to appeal to the Energy and Water Ombudsman (Victoria); and
- In the event that an objection is not resolved to the satisfaction of the customer under CitiPower's internal review system, then the customer is entitled to seek resolution via the dispute resolution process available under Part 10 of the NEL.

11.4.3 External review of tariff class assignment and reassignment

If a customer's objection to a tariff class assignment or reassignment is upheld by a relevant external dispute resolution body, then any adjustment which needs to be made to prices will be done by CitiPower as part of the next annual review of prices.

11.5 System of assessment and review of the basis on which a customer is charged

Each year CitiPower undertakes significant analysis to devise efficient tariffs for its customers. This activity is somewhat ad-hoc in nature and depends on many circumstances such as regulatory matters, enabling technologies, modelling capabilities and data. These assessments culminate in the delivery of new tariffs which are submitted as a part of the annual tariff review process and developed in accordance with the requirements of Appendix E of the Final Decision.

11.6 Installation of interval meters and assignment of customers to time of use (TOU) tariffs

As a part of its AMI rollout procedures a number of communication letters are provided to customers, one such letter notifies the customer of the potential future tariff reassignment in accordance with the distribution code requirements. CitiPower believe this process meets the requirements of clauses 14 and 15 of Appendix G on the AER's Final Decision.

12 Alternative Control Services

In Chapters 19 & 20 of the Final Decision the AER has referred to clause 6.2.2(a) of the Rules where it classifies direct control services as standard control services or alternative control services.

This section of the Pricing Proposal sets out CitiPower's approach to the pricing of its alternative control services and demonstrates compliance with the Rules and the AER's Final Decision.

12.1 Regulatory Requirements

12.1.1 Rules requirements

The Rules requirements pertaining to Pricing Proposals that apply to direct control services are applicable to both standard control services and alternative control services. The requirements for items to be included in the pricing proposal specific to Alternative Control Services are as follows.

6.18.2 Pricing proposals

- (b) *A pricing proposal* must:
 - (1) set out the *tariff classes* that are to apply for the relevant *regulatory year*; and
 - (2) set out the proposed tariffs for each *tariff class*; and
 - (3) set out, for each proposed tariff, the *charging parameters* and the elements of service to which each *charging parameter* relates; and
 - (5) set out the nature of any variation or adjustment to the tariff that could occur during the course of the *regulatory year* and the basis on which it could occur; and
 - (7) demonstrate compliance with the *Rules* and any applicable distribution determination; and
 - (8) describe the nature and extent of change from the previous *regulatory year* and demonstrate that the changes comply with the *Rules* and any applicable distribution determination.

6.18.3 Tariff classes

- (a) *A pricing proposal* must define the *tariff classes* into which customers for *direct control services* are divided.
- (b) Each customer for *direct control services* must be a member of 1 or more *tariff classes*.
- (c) Separate *tariff classes* must be constituted for customers to whom *standard control services* are supplied and customers to whom *alternative control services* are supplied (but a customer for both *standard control services* and *alternative control services* may be a member of 2 or more *tariff classes*).
- (d) *A tariff class* must be constituted with regard to:

- (1) the need to group customers together on an economically efficient basis; and
- (2) the need to avoid unnecessary transaction costs.

6.18.4 Principles governing assignment or re-assignment of customers to tariff classes and assessment and review of basis of charging

- (a) In formulating provisions of a distribution determination governing the assignment of customers to *tariff classes* or the re-assignment of customers from one *tariff class* to another, the AER must have regard to the following principles:
 - (1) customers should be assigned to *tariff classes* on the basis of one or more of the following factors:
 - (i) the nature and extent of their usage;
 - (ii) the nature of their *connection* to the *network*;
 - (iii) whether remotely-read interval metering or other similar metering technology has been installed at the customer's premises as a result of a *regulatory obligation or requirement*;
 - (2) customers with a similar *connection* and usage profile should be treated on an equal basis;
 - (3) however, customers with micro-generation facilities should be treated no less favourably than customers without such facilities but with a similar load profile;
 - (4) a *Distribution Network Service Provider's* decision to assign a customer to a particular *tariff class*, or to re-assign a customer from one *tariff class* to another should be subject to an effective system of assessment and review.

Note:

If (for example) a customer is assigned (or reassigned) to a *tariff class* on the basis of the customer's actual or assumed *maximum demand*, the system of assessment and review should allow for the reassignment of a customer who demonstrates a reduction or increase in *maximum demand* to a *tariff class* that is more appropriate to the customer's *load* profile.

- (b) If the *charging parameters* for a particular tariff result in a basis of charge that varies according to the usage or load profile of the customer, a distribution determination must contain provisions for an effective system of assessment and review of the basis on which a customer is charged.

6.18.5 Pricing principles

- (a) For each *tariff class*, the revenue expected to be recovered should lie on or between:
 - (1) an upper bound representing the stand alone cost of serving the customers who belong to that class; and
 - (2) a lower bound representing the avoidable cost of not serving those customers.

- (b) A tariff, and if it consists of 2 or more *charging parameters*, each *charging parameter* for a *tariff class*:
 - (1) must take into account the long run marginal cost for the service or, in the case of a *charging parameter*, for the element of the service to which the *charging parameter* relates; and
 - (2) must be determined having regard to:
 - (i) transaction costs associated with the tariff or each *charging parameter*; and
 - (ii) whether customers of the relevant *tariff class* are able or likely to respond to price signals.
- (c) If, however, as a result of the operation of paragraph (b), the *Distribution Network Service Provider* may not recover the expected revenue, the provider must adjust its tariffs so as to ensure recovery of expected revenue with minimum distortion to efficient patterns of consumption.

6.18.9 Publication of information about tariffs and tariff classes

- (a) A *Distribution Network Service Provider* must maintain on its website:
 - (1) a statement of the provider's *tariff classes* and the tariffs applicable to each class; and
 - (2) for each tariff – the *charging parameters* and the elements of the service to which each *charging parameter* relates; and
 - (3) a statement of expected price trends (to be updated for each *regulatory year*) giving an indication of how the *Distribution Network Service Provider* expects prices to change over the *regulatory control period* and the reasons for the expected changes.
- (b) The information for a particular *regulatory year* must, if practicable, be posted on the website 20 *business days* before the commencement of the relevant *regulatory year* and, if that is not practicable, as soon as practicable thereafter.

12.2 Alternative Control Services Tariff Classes

CitiPower has constituted a single separate tariff class named Alternative Control Services. This single tariff class has been defined to encompass all fee based and quoted services.

All customers for direct control services are members of the Alternative Control Services Tariff Class, there has been no classification of customers as all charges apply to all customers. Thus the requirements of clause 6.18.3 of the Rules have been satisfied.

The tariff classes that are to apply for the 2012 regulatory year, the proposed tariffs for each tariff class, and for each proposed tariff, the charging parameters and the elements of service to which each charging parameter relates is set out in Appendix D

of this Pricing Proposal which satisfies the requirements of clause 6.18.2(b)(1), (2), and (3) of the Rules.

12.3 Assignment and reassignment of customers to the alternative control service tariff class

CitiPower has assigned all of its Alternative Control Services customers to a single Alternative Control Services tariff class. Any new Alternative Control Services customers during the 2011-15 regulatory control period will be assigned to this tariff class.

As there is only a single tariff class proposed, there will be no requirement to reassign customers to another alternative control tariff class during the 2011-15 regulatory control period.

Thus the requirement of clause 6.18.4 of the Rules has been satisfied.

12.4 Pricing Principles

Clause 6.18.5 of the Rules sets out the pricing principles that must be complied with in respect of each tariff class, including a tariff class within the classification of alternative control services.

As noted in section 12.2 of this Pricing Proposal, CitiPower has established a single tariff class for its alternative control metering services.

12.4.1 Stand alone and avoidable costs of alternative control services

Clause 6.18.5(a) of the Rules requires the revenue of each tariff class to lie on or between the stand-alone and avoidable costs of serving the customers in the tariff class.

The '*bottom-up*' methodology used to determine the costs of alternative control services in respect of each of the tariffs reflects the recovery of expected costs to provide a uniform service. The recovery consists entirely of variable costs. This methodology therefore delivers revenue from the alternative control services tariff class that reflects the cost that would be avoided by not serving those customers.

Furthermore, given that alternative control services customers are subject to variable services, stand-alone costs have been assessed as being equal to the revenue from the alternative control services metering services tariff class.

CitiPower's Alternative Control Services class therefore meets the requirements of clause 6.18.5(a) of the Rules.

12.4.2 Long run marginal costs and revenue recovery

Clause 6.18.5(b) of the Rules requires each charging parameter for a tariff class to take into account the LRMC of providing that service.

The non-public lighting Alternative Control Services are entirely Opex based, i.e. the price signalling reflects the short term expenditure incurred in providing the service. In essence there is no long run costs associated with the provision of these services. Additionally the charges have been developed using a bottom-up methodology which reflects the actual costs of providing the service, therefore the revenue directly reflects the costs of providing such services. This satisfies the requirement to reflect the long run marginal costs of providing the service.

The tariffs for alternative control services were determined having regard to the variable transaction costs associated with the services relevant to each tariff. As noted by the AER in the Final Determination, CitiPower created tariffs to ensure that the tariffs relevant to customers most likely to respond to price signals are explicitly cost reflective.

Thus the requirements of clause 6.18.5(b)(1) and (2) of the Rules have been satisfied.

CitiPower's alternative control services each have a single charging parameter that recovers the whole of the expected revenue. As a consequence, clause 6.18.5(c) of the Rules is not applicable.

12.5 Compliance with the AER Determination

In accordance with the decision made by the AER under clause 6.12.1(13) of the Rules, CitiPower has demonstrated compliance with the control mechanism for alternative control services by providing, as part of this proposal, the proposed tariffs that correspond to the price terms contained in the WAPC equation.

The WAPC equation applicable to CitiPower's alternative control services tariff class for the next regulatory control period is set out in section 20 of the AER's Final Decision. Appendix D sets out the tariffs that correspond to the price terms contained in the alternative control services WAPC equation.

Clause 6.18.2(b)(5) of the NER seeks advice on the nature of any adjustments to the tariffs during the course of the regulatory year. The structure of the tariffs disclosed in Appendix D has been set for the 2011 to 2015 regulatory period and CitiPower does not expect this structure to change. However, each year as part of the Annual Pricing Submission, tariffs are adjusted by an X factor and CPI which was approved by the AER in the Final Decision. Adjustments outside of those determined in the Final Decision are not expected during the regulatory period.

CITIPOWER PTY'S 2012 PRICING PROPOSAL

The price cap formula for the individual alternative control services set out in the Framework and approach paper is reproduced below:

$$p_t \leq p_{t-1} \times (1 + CPI_t) \times (1 - X_t)$$

where:

regulatory year 't' is the regulatory year in respect of which the calculation is being made;

regulatory year 't-1' is the regulatory year immediately preceding regulatory year 't';

p_t is the price cap for each individual alternative control service in regulatory year 't';

CPI_t is calculated as follows:

The Consumer Price Index, All Groups Index Number (weighted average of eight capital cities) published by the Australia Bureau of Statistics for the September Quarter immediately preceding the start of regulatory year t ;

divided by

The Consumer Price Index, All Groups Index Number (weighted average of eight capital cities) published by the Australia Bureau of Statistics for the September Quarter immediately preceding the start of regulatory year $t-1$; X to be determined using the building block approach.

The X Factor escalations following are as the Final Decision.

Year	2012	2013	2014	2015
X Factor	-37.38%	-27.19%	-0.29%	-0.22%

Table 20 - X Factor for fee based connection services (real)

Year	2012	2013	2014	2015
X Factor	-0.54%	-1.79%	-3.31%	-1.81%

Table 21 - X Factor for other fee based services (real)

Year	2012	2013	2014	2015
X Factor	-3.02%	-2.22%	-0.67%	-1.40%

Table 22 - X Factor for quoted services (real)

CitiPower has demonstrated compliance with the WAPC in the AER's template provided for the purpose, which is attached as Appendix K.

Finally clause 6.18.2(b)(8) of the Rules requires a description of changes from previous regulatory periods and how these changes comply with the Rules and the determination. There have been some significant changes from the previous regulatory period specific to Alternative Control Services this was due to the fact that these services had not been reviewed for a number of years; following is an extract from page 835 of the draft decision recognising this fact:

For most alternative control services currently provided, the Victorian DNSPs' prices have not been amended or escalated for some time. The ESCV's 2006

EDPR allowed some price increases for new connection services to provide for the costs of installing interval meters as part of the ESCV's interval meter rollout program.¹⁴ Prices for other alternative control services have not been adjusted by the ESCV in previous regulatory determinations except in relation to the introduction of the Commonwealth Goods and Services Tax in 2000. The Victorian DNSPs did not provide any information on the original basis and methodology used to set alternative control services prices when economic regulation of these services by the Office of the Regulator General¹⁵ commenced in the mid 1990s.

12.6 Public Lighting Operation, Maintenance and Replacement

CitiPower has submitted its public lighting OM&R prices in accordance with the AER's instruction⁹ to update the limited building blocks model developed as part of the Final Decision with the September 2010 quarter CPI. This model incorporates the nominal price increases as approved by the AER in the Final Decision. (see Appendix L)

12.7 Publication of Tariff information

CitiPower has put in place mechanisms to ensure compliance with clause 6.18.9 of the Rules. Appendix D which contains the tariff classes that are to apply for the 2012 regulatory year, the proposed tariffs for each tariff class, and for each proposed tariff, the charging parameters and the elements of service to which each charging parameter relates will be available on CitiPower's website.

⁹ E-mail received from Craig Madden, 17 November 2010

13 Appendices

A Tariff schedules

CITIPower PTY'S 2012 PRICING PROPOSAL



NETWORK TARIFF SCHEDULE

(GST EXCLUSIVE)

1 JANUARY 2012 – 31 DECEMBER 2012

NUoS Tariff	Code	Available to new customers?	Standing charges \$/cust pa	Demand charges \$/kW pa	Minimum Demand	Peak charges				Off Peak Charges c/kWh
						Block 1	Block 2	Block 3	Block 4	
						c/kWh	c/kWh	c/kWh	c/kWh	
Residential Single Rate	C1R	No	22.5264			5.2402	6.7915			
Residential Single Rate - Bulk	C1RB	No	18.6432			4.2746	5.3831			
Residential Two Rate 5d	C2R	No	48.8963			9.2888	9.2888			1.5999
Residential Two Rate 5d - Bulk	C2RB	No	45.6026			7.3288	7.3288			1.4934
Residential Interval	C3R	Yes	48.8963			9.2888	9.2888			1.5999
Residential Interval - Bulk	C3RB	Yes	45.6026			7.3288	7.3288			1.4934
Residential Two Rate 5d - Controlled Load	C2ROP	No								1.5999
Residential Two Rate 5d - Bulk - Controlled	C2RBOP	No								1.4934
Dedicated Circuit	CDS	No								1.5237
Dedicated Circuit - Bulk	CDSB	No								1.3988
Non-Residential Single Rate	C1G	No	50.8827			6.2076	6.2076			
Non-Residential Single Rate - Bulk	C1GB	No	41.6899			5.0883	5.0883			
Non-Residential Two Rate 5d	C2G5	No	120.8375			8.8599	8.8599			2.0542
Non-Residential Two Rate 5d - Bulk	C2G5B	No	108.2266			6.9379	6.9379			1.6139
Non-Residential Interval	C3G	Yes	120.8375			8.8599	8.8599			2.0542
Non-Residential Interval - Bulk	C3GB	Yes	108.2266			6.9379	6.9379			1.6139
Non-Residential Two Rate 7d	C2G7	No	109.6985			6.5565	6.5565			1.9284
Non-Residential Two Rate 7d - Bulk	C2G7B	No	96.9492			5.2263	5.2263			1.5304
Unmetered Supplies / Public Lighting	C2U	Yes				6.4968	6.4968			2.1089
Large Two Rate 7d	C2L7	No	107.7737			7.2665	7.2665			2.0172
Large Low Voltage Demand	C2DL	Yes		73.5208	120	3.0302	3.0302			1.8256
Large Low Voltage Demand - Bulk	C2DLB	Yes		68.2021	120	2.5663	2.5663			1.7300
Large Low Voltage Demand R	C2DLER	Yes		78.3287	120	3.1743	3.1743			1.9488
Large Low Voltage Demand G	C2DLEG	Yes		78.3287	120	3.1743	3.1743			1.9488
Large Low Voltage Demand - Bulk R	C2DLBER	Yes		72.6279	120	2.6832	2.6832			1.8472
Large Low Voltage Demand - Bulk G	C2DLBEG	Yes		72.6279	120	2.6832	2.6832			1.8472
High Voltage Demand	C2DH	Yes		49.4940	1000	2.2590	2.2590			1.0859
High Voltage Demand D1	C2DHD1	No		37.9170	40000	1.8809	1.8809			0.9723
High Voltage Demand R	C2DHER	Yes		52.6703	1000	2.3564	2.3564			1.1566
High Voltage Demand G	C2DHEG	Yes		52.6703	1000	2.3564	2.3564			1.1566
Subtransmission Demand	C2DT	Yes		13.5361	10000	2.2623	2.2623			0.8016

B Tariff eligibility

The following appendix details the tariffs available to new and existing customers in 2011.

CITIPower PTY'S 2012 PRICING PROPOSAL

Tariffs Available to New and Existing Customers in 2012

All times re in Eastern Standard Time, ie: not Daylight Savings Time.

TARIFF CODE	TARIFF DESCRIPTION	SUPPLY VOLTAGE (V)	DEMAND (kW)	PEAK PERIODS	SHOULDER PERIODS	OFF-PEAK PERIODS	ELIGIBLE CUSTOMERS
EMBEDDED GENERATION							
TFIT ¹⁰	Solar Feed-in tariff	N/A	N/A	7 days, 24 hrs	N/A	N/A	<ul style="list-style-type: none"> - Must have a compliant meter. - Produces electricity from a qualifying photo voltaic generation unit - Has a name-plate generation capacity <= 5kW - Is not a part of an embedded network - Must forfeit controlled load - Must meet other legislative eligibility criteria
RESIDENTIAL CUSTOMERS							
C3R	Residential	<1,000	<120	Mon-Fri 0700 -2300	N/A	Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	- Residential customers
C3RB	Residential - Bulk	<1,000	<120	Mon-Fri 0700 -2300	N/A	Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	- Residential customers who are supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation.
NON-RESIDENTIAL CUSTOMERS							
C3G	Non-Residential Interval	<1,000	<120	Mon-Fri 0700 -2300	Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	Applies to: <ul style="list-style-type: none"> - Non-residential customers - Builder's temporary supplies

¹⁰ Availability of this tariff is subject to legislative approval by the Victorian State Government expected in late December, 2011.

CITIPower PTY'S 2012 PRICING PROPOSAL

TARIFF CODE	TARIFF DESCRIPTION	SUPPLY VOLTAGE (V)	DEMAND (kW)	PEAK PERIODS	SHOULDER PERIODS	OFF-PEAK PERIODS	ELIGIBLE CUSTOMERS
C3GB	Non-Residential Interval - Bulk	<1,000	<120	Mon-Fri 0700 -2300	N/A	Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - Customers who are supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation and <ul style="list-style-type: none"> - Non-residential customers; or - Builder's temporary supplies
C2U	Unmetered Supplies / Public Lighting	<1,000	N/A	Mon-Fri 0700-2300	N/A	Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - Customers with an approved unmetered load - Public Lighting to a public lighting customer <p>Note: New customer connections are required to install a load-limiting device</p>
LARGE LOW VOLTAGE CONTRACT DEMAND CUSTOMERS							
C2DL	Large Low Voltage Demand	<1,000	≥120	Mon-Fri 0700-2300		Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - Large customers
C2DLER	Large Low Voltage Demand Embedded Network Residential	<1,000	≥120	Mon-Sun 0700-2300		Mon-Sun 2300-0700	<ul style="list-style-type: none"> - Embedded Network customers with demand up to 250kW - Connection points within the Embedded Network will be predominantly residential
C2DLEG	Large Low Voltage Demand Embedded Network Non-Residential	<1,000	≥120	Mon-Fri 0700-2300		Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - Embedded Network customers with demand up to 250kW. - Connection points within the Embedded Network will be predominantly non-residential
C2DLB	Large Low Voltage Demand - Bulk	<1,000	≥120	Mon-Fri 0700-2300		Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - Embedded Network customers with demand up to 250kW - Large customers who are supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation
C2DLBER	Large Low Voltage Demand Embedded Network Residential - Bulk	<1,000	≥120	Mon-Sun 0700-2300		Mon-Sun 2300-0700	<ul style="list-style-type: none"> - Embedded Network customers with demand up to 250kW - Customers supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation - Connection points within the Embedded Network will be predominantly residential

CITIPower PTY'S 2012 PRICING PROPOSAL

TARIFF CODE	TARIFF DESCRIPTION	SUPPLY VOLTAGE (V)	DEMAND (kW)	PEAK PERIODS	SHOULDER PERIODS	OFF-PEAK PERIODS	ELIGIBLE CUSTOMERS
C2DLBEG	Large Low Voltage Demand Embedded Network Non-Residential - Bulk	<1,000	≥120	Mon-Fri 0700-2300		Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - Embedded Network customers with demand up to 250kW - Customers supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation - Connection points within the Embedded Network will be predominantly non-residential
HIGH VOLTAGE CONTRACT DEMAND CUSTOMERS							
C2DH	High Voltage Demand	≥1,000 and <22,000	≥1,000	Mon-Fri 0700-2300		Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - High voltage customers
C2DHER	High Voltage Demand Embedded Network Residential	≥1,000 and <22,000	≥1,000	Mon-Sun 0700-2300		Mon-Sun 2300-0700	<ul style="list-style-type: none"> - High voltage customers either registered by the ESC or AER as an Embedded Network or who have an exemption from holding a distribution licence - Connection points within the Embedded Network will be predominantly residential
C2DHEG	High Voltage Demand Embedded Network Non-Residential	≥1,000 and <22,000	≥1,000	Mon-Fri 0700-2300		Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - High voltage customers either registered by the ESC or AER as an Embedded Network or who have an exemption from holding a distribution licence - Connection points within the Embedded Network will be predominantly residential
SUBTRANSMISSION VOLTAGE DEMAND CUSTOMERS							
C2DT	Subtransmission Demand	≥22,000	≥10,000	Mon-Fri 0700-2300		Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - Subtransmission voltage customers

CITIPower PTY'S 2012 PRICING PROPOSAL

Tariffs Only Available to Existing Customers Already Assigned this Tariff @ 1 January 2011. (closed to new customers)

TARIFF CODE	TARIFF DESCRIPTION	SUPPLY VOLTAGE (V)	DEMAND (KW)	PEAK PERIODS	OFF-PEAK PERIODS	ELIGIBLE CUSTOMERS	ALLOWED CONTROLLED LOADS
EMBEDDED GENERATION							
PFIT	Premium Feed-in tariff	N/A	N/A	7 days, 24 hrs	N/A	<ul style="list-style-type: none"> - Must have a single element interval meter - Produces electricity from a qualifying photo voltaic generation unit - Has a name-plate generation capacity <= 5kW - Is not a part of an embedded network - Customers taking up this tariff will have their GP&L load remain in it's existing tariff unless otherwise advised by the retailer to move to an existing open tariff. If the customer has a controlled load hot water or slab heating then the customer will be automatically transferred to a ToU tariff 	<u>New or changed:</u> <ul style="list-style-type: none"> - None <u>Existing:</u> <ul style="list-style-type: none"> - Controlled load tariffs CDS and CDSB must be forfeited.
RESIDENTIAL CUSTOMERS							
C1R	Residential Single Rate	<1,000	<120	7 days, 24 hours	N/A	<ul style="list-style-type: none"> - Existing customers only 	<ul style="list-style-type: none"> - See tariff CDS
C1RB	Residential Single Rate - Bulk	<1,000	<120	7 days, 24 hours	N/A	<ul style="list-style-type: none"> - Customers who are supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation - Existing customers only 	<ul style="list-style-type: none"> - See tariff CDSB

CITIPOWER PTY'S 2012 PRICING PROPOSAL

TARIFF CODE	TARIFF DESCRIPTION	SUPPLY VOLTAGE (V)	DEMAND (KW)	PEAK PERIODS	OFF-PEAK PERIODS	ELIGIBLE CUSTOMERS	ALLOWED CONTROLLED LOADS
C2R	Residential Two Rate 5d	<1,000	<120	Mon-Fri 0700-2300	Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - Existing customers only 	<p>1-phase electric hot water service with a total load of <30Amps.</p> <p><u>Switching Times:</u></p> <ul style="list-style-type: none"> - Typically switching times will occur between 11pm and 7am. These times may vary depending on localised demand management activities.
C2ROP	Residential Two Rate 5d – controlled load	<1,000	<120	N/A	7 Days, 24 hours	<ul style="list-style-type: none"> - Where GP&L is connected to C2R - Applicable to hot water only - Where metering permits 	<p>1-phase electric hot water service with a total load of <30Amps.</p> <p><u>Switching Times:</u></p> <ul style="list-style-type: none"> - Typically switching times will occur between 11pm and 7am. These times may vary depending on localised demand management activities.
C2RBOP	Residential Two Rate 5d – Bulk - controlled load	<1,000	<120	N/A	7 Days, 24 hours	<ul style="list-style-type: none"> - Where GP&L is connected to C2RB - Applicable to hot water only - Where metering permits 	<p>1-phase electric hot water service with a total load of <30Amps.</p> <p><u>Switching Times:</u></p> <ul style="list-style-type: none"> - Typically switching times will occur between 11pm and 7am. These times may vary depending on localised demand management activities.

CITIPower PTY'S 2012 PRICING PROPOSAL

TARIFF CODE	TARIFF DESCRIPTION	SUPPLY VOLTAGE (V)	DEMAND (KW)	PEAK PERIODS	OFF-PEAK PERIODS	ELIGIBLE CUSTOMERS	ALLOWED CONTROLLED LOADS
C2RB	Residential Two Rate 5d - Bulk	<1,000	<120	Mon-Fri 0700-2300	Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - Customers who are supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation - Existing customers only 	<p>1-phase electric hot water service with a total load of <30Amps.</p> <p><u>Switching Times:</u></p> <ul style="list-style-type: none"> - Typically switching times will occur between 11pm and 7am. These times may vary depending on localised demand management activities.
CDS	Dedicated Circuit	<1,000	<120	N/A	7 days	<ul style="list-style-type: none"> - Existing customers only - Residential customers with a dedicated circuit connected to a controlled load 	<p>1-phase electric hot water service with a total load of <30Amps.</p> <p><u>Switching Times:</u></p> <ul style="list-style-type: none"> - Typically switching times will occur between 11pm and 7am. These times may vary depending on localised demand management activities. <p>Slab heating</p> <p>Typically switching times will may vary depending on localised demand management activities.</p> <ul style="list-style-type: none"> - 12am and 7am. - An afternoon boost between 1pm and 4pm may occur during winter.

CITIPower PTY'S 2012 PRICING PROPOSAL

TARIFF CODE	TARIFF DESCRIPTION	SUPPLY VOLTAGE (V)	DEMAND (KW)	PEAK PERIODS	OFF-PEAK PERIODS	ELIGIBLE CUSTOMERS	ALLOWED CONTROLLED LOADS
CDSB	Dedicated Circuit - Bulk	<1,000	<120	N/A	7 days	<ul style="list-style-type: none"> - Existing customers only - Residential customers with a dedicated circuit connected to a controlled load who are supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation 	<p>1-phase electric hot water service with a total load of <30Amps.</p> <p><u>Switching Times:</u></p> <ul style="list-style-type: none"> - Typically switching times will occur between 11pm and 7am. These times may vary depending on localised demand management activities. <p>Slab heating</p> <p>Typically switching times will may vary depending on localised demand management activities.</p> <ul style="list-style-type: none"> - 12am and 7am. - An afternoon boost between 1pm and 4pm may occur during winter.
NON-RESIDENTIAL CUSTOMERS							
C1G	Non-Residential Single Rate	<1,000	<120	7 days, 24 hours	N/A	<ul style="list-style-type: none"> - Non-residential customers - Builder's temporary supply 	None

CITIPower PTY'S 2012 PRICING PROPOSAL

TARIFF CODE	TARIFF DESCRIPTION	SUPPLY VOLTAGE (V)	DEMAND (KW)	PEAK PERIODS	OFF-PEAK PERIODS	ELIGIBLE CUSTOMERS	ALLOWED CONTROLLED LOADS
C1GB	Non-Residential Single Rate - Bulk	<1,000	<120	7 days, 24 hours	N/A	<ul style="list-style-type: none"> - Customers who are supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation and <ul style="list-style-type: none"> - Non-residential customers; or - Builder's temporary supplies 	None
C2G5	Non- Residential Two Rate 5d	<1,000	<120	Mon-Fri 0700-2300	Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - Non-residential customers without a controlled load who requested a 2 rate tariff 	None
C2G5B	Non- Residential Two Rate 5d - Bulk	<1,000	<120	Mon-Fri 0700-2300	Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - Non-residential customers who requested a 2 rate tariff - Who are supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation. 	None
C2G7	Non-Residential Two Rate 7d	<1,000	<120	Mon-Sun 0700-2300	Mon-Sun 2300-0700	<ul style="list-style-type: none"> - Non-residential customers who requested a 7-day, 2 rate tariff 	None
C2G7B	Non-Residential Two Rate 7d - Bulk	<1,000	<120	Mon-Sun 0700-2300	Mon-Sun 2300-0700	<ul style="list-style-type: none"> - Non-residential customers who requested a 7-day, 2 rate tariff who are supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation. 	None
CDS	Dedicated Circuit	<1,000	<120	N/A	7 days	<ul style="list-style-type: none"> - Non-residential customers with a dedicated circuit connected to a controlled load 	None
CDSB	Dedicated Circuit - Bulk	<1,000	<120	N/A	7 days	<ul style="list-style-type: none"> - Non-residential customers tariff with a dedicated circuit connected to a controlled load who are supplied directly from on-site substation terminals where there are no CitiPower distribution assets beyond the substation 	None

CITIPower PTy'S 2012 PRICING PROPOSAL

TARIFF CODE	TARIFF DESCRIPTION	SUPPLY VOLTAGE (V)	DEMAND (KW)	PEAK PERIODS	OFF-PEAK PERIODS	ELIGIBLE CUSTOMERS	ALLOWED CONTROLLED LOADS
C2L7	Large Two Rate 7d	<1,000	<120	Mon-Sun 0700-2300	Mon-Sun 2300-0700	<ul style="list-style-type: none"> - Large non-demand customers who requested a 7-day, 2 rate tariff - Customers on this tariff prior to their AMI meter exchange will remain on this tariff. 	None
HIGH VOLTAGE CONTRACT DEMAND CUSTOMERS							
C2DHD1	High Voltage Demand D1	≥1,000 and <22,000	≥40,000	Mon-Fri 0700-2300	Mon-Thurs 2300-0700 Fri 2300 - Mon 0700	<ul style="list-style-type: none"> - High voltage customers connected at 11/6.6kV via 2 or more dedicated closed ring feeders without directional powerflow control and without auto/transfer capability 	None

C Rate change

All prices in the following sections are exclusive of GST.

C.1 Low Voltage Residential tariff class

C.1.1 Low voltage residential single rate tariff

Tariff	Residential Single Rate				
Tariff Code	C1R				
	Charging parameter	UoM	2011	2012	Variance
	Standing charges	\$/cust pa	15.8858	17.0842	1.1984
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	3.8556	4.1050	0.2494
	Block 2	c/kWh	5.3127	5.6563	0.3436
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.0000	0.0000	0.0000
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	Residential Single Rate - Bulk				
Tariff Code	C1RB				
	Charging parameter	UoM	2011	2012	Variance
	Standing charges	\$/cust pa	13.6987	14.7321	1.0334
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	3.1160	3.3176	0.2016
	Block 2	c/kWh	4.1572	4.4261	0.2689
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.0000	0.0000	0.0000
	Block 2	c/kWh	0.0000	0.0000	0.0000

C.1.2 Low voltage residential ToU tariff

Tariff	Residential Two Rate 5d				
Tariff Code	C2R				
	Charging parameter	UoM	2011	2012	Variance
	Standing charges	\$/cust pa	35.4673	38.1429	2.6756
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	7.1472	7.8401	0.6929
	Block 2	c/kWh	7.1472	7.8401	0.6929
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.6974	0.7650	0.0676
	Block 2	c/kWh	0.0000	0.0000	0.0000

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Tariff	Residential Two Rate 5d - Bulk				
Tariff Code	C2RB				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	34.9644	37.6021	2.6377
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	5.6249	6.1702	0.5453
	Block 2	c/kWh	5.6249	6.1702	0.5453
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.5957	0.6535	0.0578
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	Residential Interval				
Tariff Code	C3R				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	35.4673	38.1429	2.6756
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	7.1472	7.8401	0.6929
	Block 2	c/kWh	7.1472	7.8401	0.6929
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.6974	0.7650	0.0676
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	Residential Interval - Bulk				
Tariff Code	C3RB				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	34.9644	37.6021	2.6377
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	5.6249	6.1702	0.5453
	Block 2	c/kWh	5.6249	6.1702	0.5453
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.5957	0.6535	0.0578
	Block 2	c/kWh	0.0000	0.0000	0.0000

CITIPower PTY'S 2012 PRICING PROPOSAL

Tariff	Residential Two Rate 5d - Controlled Load				
Tariff Code	C2ROP				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.0000	0.0000	0.0000
	Block 2	c/kWh	0.0000	0.0000	0.0000
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.6974	0.7650	0.0676
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	Residential Two Rate 5d - Bulk - Controlled Load				
Tariff Code	C2RBOP				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.0000	0.0000	0.0000
	Block 2	c/kWh	0.0000	0.0000	0.0000
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.5957	0.6535	0.0578
	Block 2	c/kWh	0.0000	0.0000	0.0000

C.1.3 Controlled load tariffs

Tariff	Dedicated Circuit				
Tariff Code	CDS				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.0000	0.0000	0.0000
	Block 2	c/kWh	0.0000	0.0000	0.0000
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.7790	0.8378	0.0588
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	Dedicated Circuit - Bulk				
Tariff Code	CDSB				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000

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Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.0000	0.0000	0.0000
	Block 2	c/kWh	0.0000	0.0000	0.0000
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.6829	0.7344	0.0515
	Block 2	c/kWh	0.0000	0.0000	0.0000

C.2 Low Voltage Business tariff class

C.2.1 Low voltage business single rate tariff

Tariff	Non-Residential Single Rate				
Tariff Code	C1G				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	35.7814	38.8655	3.0841
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	4.5347	4.6817	0.1470
	Block 2	c/kWh	4.5347	4.6817	0.1470
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.0000	0.0000	0.0000
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	Non-Residential Single Rate - Bulk				
Tariff Code	C1GB				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	30.5181	33.1485	2.6304
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	3.6212	3.7775	0.1563
	Block 2	c/kWh	3.6212	3.7775	0.1563
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.0000	0.0000	0.0000
	Block 2	c/kWh	0.0000	0.0000	0.0000

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C.2.2 Low voltage business ToU tariffs

Tariff		Non-Residential Two Rate 5d			
Tariff Code		C2G5			
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	84.9770	92.3014	7.3244
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	6.2329	6.9042	0.6713
	Block 2	c/kWh	6.2329	6.9042	0.6713
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	1.2381	1.3581	0.1200
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff		Non-Residential Two Rate 5d - Bulk			
Tariff Code		C2G5B			
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	79.2267	86.0555	6.8288
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	4.7162	5.2749	0.5587
	Block 2	c/kWh	4.7162	5.2749	0.5587
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.9240	1.0235	0.0995
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff		Non-Residential Interval			
Tariff Code		C3G			
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	84.9770	92.3014	7.3244
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	6.2329	6.9042	0.6713
	Block 2	c/kWh	6.2329	6.9042	0.6713
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	1.2381	1.3581	0.1200
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff		Non-Residential Interval - Bulk			
Tariff Code		C3GB			
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	79.2267	86.0555	6.8288
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	4.7162	5.2749	0.5587

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	Block 2	c/kWh	4.7162	5.2749	0.5587
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.9240	1.0235	0.0995
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff		Non-Residential Two Rate 7d			
Tariff Code		C2G7			
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	77.1778	83.8300	6.6522
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	4.4694	4.8066	0.3372
	Block 2	c/kWh	4.4694	4.8066	0.3372
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	1.1459	1.2323	0.0864
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff		Non-Residential Two Rate 7d - Bulk			
Tariff Code		C2G7B			
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	70.9849	77.1033	6.1184
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	3.4704	3.7322	0.2618
	Block 2	c/kWh	3.4704	3.7322	0.2618
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.8741	0.9400	0.0659
	Block 2	c/kWh	0.0000	0.0000	0.0000

C.2.3 Unmetered supply tariffs

Tariff		Unmetered Supplies / Public Lighting			
Tariff Code		C2U			
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	5.5836	5.8847	0.3011
	Block 2	c/kWh	5.5836	5.8847	0.3011
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	1.3380	1.5109	0.1729
	Block 2	c/kWh	0.0000	0.0000	0.0000

C.3 Large Low Voltage Business tariff class

Tariff	Large Two Rate 7d				
Tariff Code	C2L7				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	74.3515	79.9605	5.6090
Demand charges	kW	\$/kW pa	0.0000	0.0000	0.0000
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	4.0640	4.3356	0.2716
	Block 2	c/kWh	4.0640	4.3356	0.2716
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	1.1824	1.2614	0.0790
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	Large Low Voltage Demand				
Tariff Code	C2DL				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	57.5599	61.4069	3.8470
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	1.0009	1.0678	0.0669
	Block 2	c/kWh	1.0009	1.0678	0.0669
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	1.0028	1.0698	0.0670
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	Large Low Voltage Demand - Bulk				
Tariff Code	C2DLB				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	52.6602	56.1798	3.5196
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.5792	0.6179	0.0387
	Block 2	c/kWh	0.5792	0.6179	0.0387
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.9192	0.9806	0.0614
	Block 2	c/kWh	0.0000	0.0000	0.0000

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Tariff	Large Low Voltage Demand				
Tariff Code	R				
	C2DLER				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	61.7122	65.8367	4.1245
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	1.0691	1.1406	0.0715
	Block 2	c/kWh	1.0691	1.1406	0.0715
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	1.0931	1.1662	0.0731
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	Large Low Voltage Demand				
Tariff Code	G				
	C2DLEG				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	61.7122	65.8367	4.1245
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	1.0691	1.1406	0.0715
	Block 2	c/kWh	1.0691	1.1406	0.0715
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	1.0931	1.1662	0.0731
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	Large Low Voltage Demand - Bulk R				
Tariff Code	C2DLBER				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	56.4581	60.2315	3.7734
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.6195	0.6609	0.0414
	Block 2	c/kWh	0.6195	0.6609	0.0414
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	1.0038	1.0709	0.0671
	Block 2	c/kWh	0.0000	0.0000	0.0000

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Tariff	Large Low Voltage Demand - Bulk G				
Tariff Code	C2DLBEG				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	56.4581	60.2315	3.7734
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.6195	0.6609	0.0414
	Block 2	c/kWh	0.6195	0.6609	0.0414
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	1.0038	1.0709	0.0671
	Block 2	c/kWh	0.0000	0.0000	0.0000

C.4 High Voltage Business tariff class

Tariff	High Voltage Demand				
Tariff Code	C2DH				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	37.4041	39.9040	2.4999
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.2814	0.3002	0.0188
	Block 2	c/kWh	0.2814	0.3002	0.0188
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.4130	0.4406	0.0276
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	High Voltage Demand D1				
Tariff Code	C2DHD1				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand charges	kW	\$/kW pa	23.4850	25.0546	1.5696
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.0701	0.0748	0.0047
	Block 2	c/kWh	0.0701	0.0748	0.0047
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.0644	0.0687	0.0043
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	High Voltage Demand R				
Tariff Code	C2DHER				
Charging parameter		UoM	2011	2012	Variance
Standing charges		\$/cust pa	0.0000	0.0000	0.0000
Demand	kW	\$/kW pa	40.1022	42.7824	2.6802

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charges	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.3035	0.3238	0.0203
	Block 2	c/kWh	0.3035	0.3238	0.0203
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.4553	0.4857	0.0304
	Block 2	c/kWh	0.0000	0.0000	0.0000

Tariff	High Voltage Demand G				
Tariff Code	C2DHEG				
Charging parameter	UoM	2011	2012	Variance	
Standing charges	\$/cust pa	0.0000	0.0000	0.0000	
Demand charges	kW	\$/kW pa	40.1022	42.7824	2.6802
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.3035	0.3238	0.0203
	Block 2	c/kWh	0.3035	0.3238	0.0203
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.4553	0.4857	0.0304
	Block 2	c/kWh	0.0000	0.0000	0.0000

C.5 Sub-transmission tariff class

Tariff	Subtransmission Demand				
Tariff Code	C2DT				
Charging parameter	UoM	2011	2012	Variance	
Standing charges	\$/cust pa	0.0000	0.0000	0.0000	
Demand charges	kW	\$/kW pa	8.6467	9.2246	0.5779
	kVA	\$/kVa pa	0.0000	0.0000	0.0000
Peak charges	Block1	c/kWh	0.0874	0.0932	0.0058
	Block 2	c/kWh	0.0874	0.0932	0.0058
	Block 3	c/kWh	0.0000	0.0000	0.0000
	Block 4	c/kWh	0.0000	0.0000	0.0000
Off Peak charges	Block 1	c/kWh	0.1297	0.1384	0.0087
	Block 2	c/kWh	0.0000	0.0000	0.0000

D Alternative Control Service Charges

Alternative Control Services are a set of activities provided by CitiPower that fall under a particular reimage of regulation due to their monopoly or semi-monopoly nature.

Alternative Control Services are divided into two subclasses:

1. Fixed Rate Services – Services are relatively fixed in nature. Charges are levied on a per activity basis; and
2. Quoted Services – Services are highly variable. Charges are levied on a time and materials basis.

We endeavour to perform all Alternative Control Services within normal business hours, however if a circumstance arises where after hours activities are required this work can only be undertaken where resources are available. The charge applicable will be based on the resource utilised. After hours work includes weekends and public holidays.

All prices are exclusive of GST.

Business Hours	8am-5pm Monday to Friday (excluding public holidays) ¹¹
After Hours	All other times and only where resources are available ¹²

Hours of Operation

The following sections will set out to list and describe the various charges classified as Fixed Rate and Quoted Alternative Control Services which apply throughout the area served by CitiPower.

¹¹ Times for disconnections (Section D1.1.3) and reconnections (Section D1.1.4) differ from these times

¹² Times for disconnections (Section D1.1.3) and reconnections (Section D1.1.4) differ from these times

D.1 Fee Based Alternative Control Services

Appendix B of the AER's Final Decision¹³, Service Classification, classifies the following service groupings as Alternative Control Services - fee based;

- Metering Services
- Public Lighting Services
- Other Fee Based Services

In some circumstances traffic management will be required to comply with the Roads Management Act to provide the requested services. CitiPower can assist in arranging for traffic control and a pass through fee shall apply.

D.1.1 Metering Services

The charges for each service apply where uninhibited site access is granted. If access to the site is restricted then a service truck may be required therefore attracting a service truck fee.

D.1.1.1 Meter Investigation

A Meter Investigation charge applies when a request is received to investigate the metering at a given supply point. A need to investigate can arise in a number of situations, such as:

- Interval data analysis
- Meter malfunction¹⁴
- Wiring transposition investigation
- Contestable metering investigation
- Meter tampering or bypass

D.1.1.2 Meter Testing

A Meter Testing charge applies when a request is made to test the accuracy of the metering at a given supply point. Different charges apply depending on the type of meter being tested, if it is the first or subsequent meters and whether the meter is single or multi phase and whether the service is provided during or after business hours.

Refer to the Meter Investigation charge for metering issues other than accuracy testing.

¹³ <http://www.aer.gov.au/content/index.phtml/itemId/740791>

¹⁴ A malfunction is defined as a meter that is operating and not presenting fault alarms but delivering inaccurate data. If the meter malfunction is identified to be a faulty distributor owned asset the fee will be waived.

D.1.1.3 De-energisation of existing connections

A Disconnection (includes Disconnections for Non Payment (DNP)) charge applies when a request is received to disconnect at a supply point. The service requires that all supply assets remain at the customer's installation.

If at the time of disconnection it is discovered that the installation has been damaged or is defective and will be unsafe to energise if a future reconnection occurs, other charges to correct the defect may be applicable. These charges will be based on the nature of the works required.

In a normal instance a de-energisation is performed by a special reader. However, there are scenarios where a Service Truck Visit may be required in its place and accordingly a Service Truck Visit (Section D.1.3.1) charge will be applied.

Some examples where a truck may be required include:

- Special reader resource is not available after hours and an alternative time is not acceptable to the customer;
- No access to distribution equipment - metering and main fuse;
- No isolation point;
- Multiple NMI's fused at a common isolation point;
- CT metered site; or
- Isolation point in restricted area – substation.

Where the request for disconnection is received by CitiPower before 3pm the disconnection will occur within 2 business days or the earliest permissible day thereafter.

D.1.1.4 Energisation of existing connections

An Energisation charge applies to customers moving into an existing premise where supply assets are installed and the site was previously de-energised.

Three options for energisation are available

1. Reconections (same day) business hours only
2. Reconections (incl. Customer Transfer) business hours
3. Reconections (incl. Customer Transfer) after hours

If the reconnection is required on the same day and CitiPower receive the request before 3pm, the '*Reconections (same day) business hours*' charge will be applied and the reconnection will occur that day.

If the reconnection is required on the same day as requested and received by CitiPower between 3pm and 9pm the '*Reconections (incl. Customer Transfer) after hours*' charge is applied.

If the reconnection is required for the next business day and CitiPower receive the request before 3pm on the previous business day the '*Reconections (incl. Customer Transfer) business hours*' charge is applied.

In the instance that a customer does not provide reasonable access or where equipment is not in a reasonable state, the customer will be charged for the requested service however, supply will not be re-energised. Before the service can be provided,

the customer may need to undertake rectification works. When the issue(s) have been resolved another request will need to be raised and a new charge will apply.

In a normal instance a re-energisation is performed by a special reader. However, there are scenarios where a Service Truck Visit may be required in its place and accordingly a Service Truck Visit (Section D.1.3.1) charge will be applied.

Some examples where a truck may be required include:

- Special reader resource is not available after hours and an alternative time is not acceptable to the customer;
- No access to distribution equipment - metering and main fuse;
- No isolation point;
- Multiple NMI's fused at a common isolation point;
- CT metered site; or
- Isolation point in restricted area – substation.

The charge will not be applied when:

- The customer changes retailer on a scheduled read; or
- The customer changes name; and
- A field visit is not necessary.

D.1.1.5 Special Meter Reading

The Special Reading/Customer Transfer charge applies when a request for a Special Meter Read is to be performed by a Field Officer outside the scheduled meter reading cycle. Where customers have multiple metering installations, such as farms and units, a separate charge applies to each meter on the property.

In some cases interval data may be required that can be obtained from AMI records, in this situation a request for data re-send is more appropriate than a special read request. If unsatisfied with the resultant data then a meter test or meter investigation may be requested.

The Special Reading/Customer Transfer service is only available during business hours.

D.1.1.6 Remote Meter Re-Configuration

The Remote Meter Configuration charge applies when a request is received to modify the metering arrangements in the case where smart metering and related infrastructure are in place.

A meter configuration is a change to the software in the meter that enables changes to parameters for a specific meter function. Examples of meter reconfigurations include:

- Changing the switching times for controlled loads
- Changes associated with the installation of embedded generation and / or the premium feed in tariff
- Implementation of supply capacity.

Meter configuration, will cover metrology and other modification to meter settings.

D.1.1.7 Remote De-energisation

The Remote De-energisation charge applies when a request is received to de-energise a customer that has smart metering and related infrastructure is in place.

Remote de-energisation is defined as the use of the AMI/smart metering infrastructure communications system to control a supply contactor inside the meter such that the customer is disconnected from the DNSP's network (also referred to as 'disconnection')

D.1.1.8 Remote Re-energisation

The Remote Re-energisation charge applies when a request is received to re-energise a customer that has smart metering and related infrastructure is in place.

Remote re-energisation is defined as the use of the AMI/smart metering infrastructure communications system to control a supply contactor inside the meter such that the customer is connected to the DNSP's network (also referred to as 'connection')

D.1.2 Public Lighting Services

Charges apply for public lighting services provided to public lighting customers in accordance with the Public Lighting Code. The following services are included:

- Operation of public lighting assets; including handling enquiries and complaints about public lighting and dispatching crews to repair public lighting assets; and
- Maintenance, repair and replacement of public lighting assets.

D.1.3 Other Fee Based Services

The services classified under the service grouping Fee Based Services have been outlined in the following sub sections and discuss the nature of the fee and how it should be applied.

D.1.3.1 Service Truck Visit

Service truck visit charges apply when a service crew is requested for up to an hour. A service truck visit charge is applied in a number of circumstances including;

- Disconnection of complex site (refer section D.1.1.3)
- Reconnection of complex site (refer section D.1.1.4)
- Metering Additions or Alternations
- Shutdowns

In the situation that a service truck visit is required for larger scale after hours works a Quoted Services charge will apply (refer to section D.2.12 'After hours truck by appointment')

Customers are not charged when a service truck is sent to attend emergency and fault calls, unless the customer is clearly at fault, for example, not checking that main switch or safety switch is on.

In the instance where a service truck visit is requested and the truck arrives to find the site is not ready for work to be carried out then a Wasted Truck Visit charge will apply (refer to section D.1.3.2).

D.1.3.2 Wasted Attendance

Where CitiPower receives a request for a service truck and:

- the crew arrives to find the site is not ready for the scheduled work within 15 minutes of arriving;
- the truck attendance is no longer required once on site; or
- 24 hours notice is not provided for a cancellation;

Then a Wasted Truck Visit charge will apply.

Once the site is ready for the Service Truck Visit another appointment needs to be booked and the normal Service Truck Visit charge applies.

Business hours and after hours charges apply where appropriate.

D.1.3.3 Reserve Feeder

A Reserve Feeder service is negotiated with customers specifically requesting continuity of electricity supply should the feeder providing normal supply to their connection experience interruption.

The reserve feeder capacity is made available from an alternative feeder that has the available capacity to facilitate the requirements that the customer has nominated. The feeder facilitating reserve capacity may emanate from another Zone sub or an alternative bus from the same Zone sub facilitating electricity supply to the substation on the customer site.

The fee covers the operation and maintenance of the service, it does not include the capital required to implement or replace the service as this is covered in the connection agreement.

D.1.3.4 PV Installation

The PV Installation charge applies prior to connection of small scale embedded generation to CitiPower's network. This charge specifically covers the inspection of the customer's site to ensure safe connection to the network and includes anti-islanding test.

D.1.3.5 Routine Connections – customers below 100 amps

These charges apply to customers moving into new premises or requesting a temporary supply, additional charges may apply where augmentation is required to meet the customer's supply requirements.

Charges apply where a request is made for a new supply connection at a specified address (including unmetered supply sites), except where the supply is for security lighting¹⁵ (also known as watchman lighting). This charge also applies where a builder wishes to provide permanent or temporary supply to new properties under construction.

For new premises the price includes a check of the installation for compliance to Service and Installations Rules and other related Connection Standards. It does not include inspection of prescribed works for the purpose of issuing of a Certificate of Electrical Safety (CES); this should be organised by a Registered Electrical Contractor (REC).¹⁶ Separate charges will apply for additional truck or field officer visits to complete connection works.

In some circumstances traffic management will be required to comply with the Roads Management Act to provide the requested services. CitiPower can assist in arranging for traffic control and a pass through fee shall apply.

On occasions when a 'Builders Temporary Supply' is installed and subsequently replaced with a permanent supply each new-connection is considered a distinct site visit and separate new-connection charges are applied, the first to the builder for establishing a new-connection for which the builder uses supply for construction purposes and a second new-connection charge to the customer for connecting the supply. This charge includes the removal of the temporary supply pole where applicable.

¹⁵ Watchman lighting is a contestable service.

¹⁶ Customers requesting an additional inspection for a CES (Certificate of Electrical Safety) will incur a separate charge. Electrical inspection services are unregulated activities and carried out by Licensed Electrical Inspectors (LEI).

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An additional attendance charge in the form of a Wasted Truck Visit charge is applied in those situations where CitiPower has been to the site and returned to complete works that have been delayed due to the fault of the responsible party or their representative. Where an application for supply is made and the site is found to be defective, the Wasted Truck Visit charge will be applied.

Where the determined maximum demand of any separately metered portion of an electrical installation exceeds 80 Amperes per active conductor, then CT metering will be required.

D.2 QUOTED SERVICES

Appendix B of the AER's Final Decision, Service Classification, classifies the following services as Alternative Control Services – quoted services;

- Rearrangement of network assets at customer request, excluding alteration and relocation of existing public lighting assets
- Supply enhancement at customer request
- Supply abolishment
- Emergency recoverable works
- Audit design and construction
- Specification and design enquiry
- Elective underground where above ground service currently exists
- Damage to overhead service cables caused by high load vehicles
- High load escorts – lifting overhead lines
- Covering of low voltage mains for safety reasons
- Routine connections – customers above 100 amps
- After hours truck by appointment

Labour rates on which quotes are based on include:

- General line worker (BH & AH)
- Design/Survey (BH & AH)
- Administration (BH only)

All Quoted Services are based on the actual hours worked multiplied by the approved labour rates plus materials used.

D.2.1 Rearrangement of network assets at customer request, excluding alteration and relocation of existing public lighting assets

A Quoted Service charge is applied when a customer requests capital work for which the prime purpose is to satisfy a customer requirement other than new or increased supply, other than where Guideline 14 is applied. Examples include;

- Vic Roads and Council requested asset relocations to allow for new road works,
- Customer removal or relocation of service wire to allow work on private installation.

D.2.2 Supply enhancement at customer request

A Quoted Service charge is applied to requests for supply enhancement to a customer site, other than where Guideline 14 is applied.

D.2.3 Supply abolishment

A Quoted Service charge is applied to requests for supply abolishments; this involves the permanent removal of CitiPower's supply assets.

D.2.4 Emergency recoverable works

A Quoted Service charge is applied to recover the costs associated with works that are required to restore CitiPower's distribution network to its standard operating level following an incident caused by an identifiable 3rd party. This includes events where there is clear evidence of damage by a third party requiring the replacement of poles (including public lighting poles), transformers, services, cross-arms, switches, public lighting fixtures or contractors digging through cables.

D.2.5 Audit design and construction

This charge may be applied where CitiPower's review, approval or acceptance of works undertaken by third parties is requested by the third party or is deemed necessary by CitiPower.

The charge may be applied in situations including, but not limited to:

- customer provided buildings, conduits or ducts used to house CitiPower's electrical assets
- customer provided connection facilities including switchboards used in the connection of an electricity supply to their installation
- any electrical distribution work completed by a CitiPower approved contractor that has been engaged by a customer under Option 2 provisions
- provision of system plans and system planning scopes, for Option 2 designers
- reviewing and/or approving plans submitted by Option 2 designers.

The charge may also be applied if CitiPower is requested to assess a contractor seeking VEDN or Option 2 contractor accreditation.

D.2.6 Specification and design enquiry

This charge may be applied where CitiPower determines an element of detailed design is required to fairly assess the costs so that an Offer for Connection Services can be issued to a customer as required under the Electricity Distribution Licence.

The charge is considered appropriate if uncertainty exists with respect to matters including, but not limited to:

- the route of the network extension required to reach the customer's property,
- the location of other utility assets,
- environmental considerations including tree clearing,
- obtaining necessary permits from State and Local Government bodies

The charge may also be applied where a customer requests CitiPower to provide information to assist them to undertake feasibility studies or to provide budget estimates.

D.2.7 Elective underground where above ground service currently exists

A Quoted Service charge applies where a customer with an existing overhead service requests an underground service, other than where Guideline 14 is applied.

D.2.8 Damage to overhead service cables caused by high load vehicles

A Quoted Service charge is applied to an identifiable 3rd party when overhead service cables require repairing because they have been damaged by high load vehicles pulling down cables.

D.2.9 High load escorts – lifting overheads

A Quoted Service charge applies when a 3rd party requires ensuring safe clearance of overhead lines to allow high load vehicles to pass along roads.

D.2.10 Covering of Low Voltage Mains for safety reasons

A Quoted Service charge applies where customers request coverage of powerlines for safety reasons. The charge applied will depend on the time taken to perform the service. Differing charges can arise as a result of the type of line being covered; street mains (two wires or all wire) or service cables.

D.2.11 Routine connections – customer above 100 amps

A Quoted Service charge is when customers above 100 amps request a routine connection, additional charges may apply where augmentation is required to meet the customer's supply requirements.

D.2.12 After hours truck by appointment

A Quoted Service charge is applied to larger scale works requiring an after hours Service Truck appointment longer than 1 hour in duration. Examples of types of works include:

- Disconnection of complex site (refer section 1.1.3)
- Reconnection of complex site (refer section 1.1.4)
- Metering Additions or Alternations
- Shutdowns (includes preparation works).

D.3 Alternative Control Service Rates for 2012

D.3.1 Metering Services Fee Based

Section Reference	Alternative Control Service	Business Hours GST Exclusive	After Hours GST Exclusive
D.1.1.1	Meter Investigation	\$254.50	\$278.09
D.1.1.2	Meter Accuracy Test - single phase	\$329.60	\$361.28
D.1.1.2	Meter Accuracy Test - Single phase additional meter	\$147.16	n/a
D.1.1.2	Meter Accuracy Test - multi phase	\$431.27	\$473.92
D.1.1.2	Meter Accuracy Test - Multi phase additional meter	\$253.42	n/a
D.1.1.2	Meter Accuracy Test - CT	\$421.31	\$462.89
D.1.1.2	Re-test of type 5 & 6 metering installations for first tier customers with annual consumption greater than 160MWh	\$323.77	\$357.30
D.1.1.3	Disconnection	\$18.58	n/a
D.1.1.3	Disconnection for non payment	\$18.58	n/a
D.1.1.4	Reconnections (incl Customer Transfer)	\$18.34	\$78.30
D.1.1.4	Reconnections (same day)	\$22.99	n/a
D.1.1.5	Special reading	\$14.22	n/a
D.1.1.6	Remote Meter Re-configuration	\$29.74	n/a
D.1.1.7	Remote De-energisation	\$5.61	n/a
D.1.1.8	Remote Re-energisation	\$5.61	n/a

D.3.2 Public Lighting Services Fee Based

Section Reference	Public Lighting Type	Annual \$ charge GST Exclusive
D.1.2	Compact Fluorescent T5 (2 X 14W)	\$34.40
D.1.2	Replacement luminaire - WDV recovery	\$136.19
D.1.2	Replacement luminaire - avoided costs	-\$21.25
D.1.2	Fluorescent 20 watt	\$134.03
D.1.2	Fluorescent 40 watt	\$134.71
D.1.2	Mercury vapour 50 watt	\$95.64
D.1.2	Mercury vapour 80 watt	\$67.35
D.1.2	Mercury vapour 125 watt	\$106.42
D.1.2	Mercury vapour 250 watt	\$94.93
D.1.2	Mercury vapour 400 watt	\$96.06
D.1.2	Mercury vapour 700 watt	\$141.27
D.1.2	Sodium 70 watt	\$142.79
D.1.2	Sodium 100 watt	\$113.46
D.1.2	Sodium 150 watt	\$111.23
D.1.2	Sodium 220 watt	\$113.24
D.1.2	Sodium 250 watt	\$113.02
D.1.2	Sodium 360 watt	\$115.28
D.1.2	Sodium 400 watt	\$124.32
D.1.2	Sodium 1000 watt	\$223.77
D.1.2	Metal halide 70 watt	\$220.25
D.1.2	Metal halide 100 watt	\$174.64
D.1.2	Metal halide 150 watt	\$175.75
D.1.2	Metal halide 250 watt	\$135.62
D.1.2	Metal halide 400 watt	\$135.62
D.1.2	Metal halide 1000 watt	\$202.30

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D.3.3 Other Fee Based Services

Section Reference	Alternative Control Service	Business Hours GST Exclusive	After Hours GST Exclusive
D.1.3.1	Service Truck Visit	\$382.82	\$420.86
D.1.3.2	Wasted Truck Visit	\$241.68	\$266.29
D.1.3.3	Reserve Feeder - Subtransmission - \$ per KVA pa	\$1.52	n/a
D.1.3.3	Reserve Feeder - High Voltage - \$ per KVA pa	\$3.15	n/a
D.1.3.3	Reserve Feeder - Low Voltage - \$ per KVA pa	\$7.79	n/a
D.1.3.4	PV Installation	\$232.63	\$249.19
	New Connections Responsible for metering		
D.1.3.5	Single phase	\$382.62	\$407.77
D.1.3.5	Multi phase DC	\$472.49	\$497.65
D.1.3.5	Multi phase CT	\$2,067.02	\$2,247.39
	New Connections Not Responsible for metering		
D.1.3.5	Single phase	\$320.94	\$346.09
D.1.3.5	Multi phase DC	\$410.83	\$435.97
D.1.3.5	Multi phase CT	\$2,005.36	\$2,185.73

D.3.4 Quoted Services Labour Rates

Section Reference	Alternative Control Service	Business Hours GST Exclusive	After Hours GST Exclusive
D.2	General line worker	\$127.54	\$141.30
D.2	Design/survey	\$121.33	\$142.89
D.2	Administration	\$52.44	n/a

E CONFIDENTIAL - Maximum Transmission Revenue Control Calculation

Refer Attachment 1

**F CONFIDENTIAL - Maximum Jurisdictional Scheme Revenue
Control Calculation**

Refer Attachment 2

G CONFIDENTIAL - Audit of 2010 quantities

Refer Attachment 3

H CONFIDENTIAL – Standalone, Avoidable and Long Run Marginal Cost Model

Refer Attachment 4

**I CONFIDENTIAL - Long Run Marginal, Stand-alone
and Avoided cost methodologies**

Refer Attachment 5

**J CONFIDENTIAL – AER Weighted Average Price
Cap Compliance Model (Standard Control)**

Refer Attachment 6

**K CONFIDENTIAL –Weighted Average Price Cap
Compliance Model (Alternative Control Services)**

Refer Attachment 7

**L Public Lighting Operation, Maintenance and Replacement
(limited building blocks model)**

Refer Attachment 8