Australian Energy Market Commission

RULE CHANGE

CONSULTATION PAPER

National Electricity Amendment (Distribution Losses in Expenditure Forecasts) Rule 2012

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About the AEMC

The Council of Australian Governments, through its Ministerial Council on Energy (MCE), established the Australian Energy Market Commission (AEMC) in July 2005. The AEMC has two principal functions. We make and amend the national electricity and gas rules, and we conduct independent reviews of the energy markets for the MCE.

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1 Introduction

1.1 Rule change request

On 22 December 2011, the Copper Development Centre (CDC or proponent) submitted a rule change request to the Australian Energy Market Commission (AEMC or Commission) regarding distribution network losses (the rule change request).

The rule change request seeks to add a requirement to the National Electricity Rules (NER or rules) that the cost of network losses is considered by Distribution Network Service Providers (DNSPs) in preparing their operating and capital expenditure forecasts.

As a component of a building block proposal, operating and capital expenditure forecasts are prepared by DNSPs for assessment by the Australian Energy Regulator (AER) as part of the revenue determination process.

1.2 Rule change process

On 19 April 2012, the Commission published a notice under section 95 of the National Electricity Law (NEL) setting out its decision to commence the rule change process in respect of this rule change request.

The Commission is required to commence the rule change process in relation to any rule change request it receives that meets the requirements of section 94 of the NEL. We are satisfied that this rule change request meets the statutory requirements, including that the Commission has the power to make the proposed rule.

Commencing the rule change process does not indicate that the Commission intends to make the proposed rule. The outcome of this rule change process may be that the Commission decides to:

- make the rule change proposed by the proponent;
- make a more preferable rule that is different from the rule change proposed by the proponent; or
- not make any rule.

Under section 88 of the NEL, the Commission may only make a rule if it is satisfied that the rule will, or is likely to, contribute to the achievement of the National Electricity Objective (NEO). The NEO is discussed further in chapter four of this consultation paper.

The procedure for the making of a rule by the AEMC, as set out in the NEL involves, at a minimum, at least four weeks of public consultation on the rule change proposal, publication of a draft rule determination, an option for a public hearing after

publication of the draft rule determination, consultation on the draft rule determination and publication of the final rule determination (and the publication of a final rule if made).

In order to provide stakeholders with adequate time to respond to the issues raised in this consultation paper, the first round of public consultation has been set at seven weeks with submissions due by 31 May 2012. The process for lodging a submission is outlined in chapter six of this consultation paper.

1.3 Purpose of this consultation paper

This consultation paper has been prepared to facilitate public consultation on the rule change proposal and does not necessarily represent the views of the AEMC or any individual Commissioner of the AEMC. This consultation paper:

- sets out a summary of, and a background to, the rule change request proposed by the proponent;
- identifies a number of questions and issues to facilitate the consultation on this rule change request; and
- outlines the process for lodging submissions.

2 Background

This chapter provides some background information on network losses and an overview of the current requirements for DNSPs in relation to the preparation of expenditure forecasts as part of the revenue determination process.

2.1 Network losses

Electricity networks transport power from generators to customers. As electricity flows through networks, energy is lost due to electrical resistance and the heating of conductors.

Most losses are defined as technical losses and may vary depending on the structure of the network, the amount of electrical energy (or load) being transported through the network and the type of network equipment (including conductors and transformers). However there are also non-technical losses which refer to theft and metering errors.

Transmission and distribution network losses account for approximately 10 per cent of the total electricity transported through the National Electricity Market (NEM).[1] Therefore, the impact of these losses must be considered in demand forecasts so that enough electricity is generated and the market is balanced.

The cost of distribution losses is accounted for in the NEM through the calculation of Distribution Loss Factors (DLFs). DLFs describe the average electrical energy losses that occur between a distribution network connection point and a transmission network connection point. DNSPs calculate DLFs in respect of their networks which are approved by the AER and published by the Australian Energy Market Operator (AEMO). AEMO uses these DLFs in the settlement process to determine the adjusted gross energy amount which retailers are charged.[2] The sum of both distribution and transmission losses are then included in the final tariff that consumers pay.

2.2 Expenditure forecasts

Electricity distribution networks display the characteristics of natural monopoly infrastructure because they have significant initial capital costs and tend to achieve economies of scale with declining marginal costs as output increases. This tends to mean that it is uneconomic to duplicate a distribution network which leads to a single network service provider for a distribution area. In the absence of the competitive

1 Australian Energy Market Operator, '*Introduction to Australia's National Electricity Market*', July 2010, page 16.

2 Similarly transmission network service providers calculate transmission loss factors (both intra-regional and inter-regional) for use by AEMO in the settlement process to account for transmission losses.

forces that would come from other providers, all distribution networks in the NEM are regulated by the AER to manage the risk of monopoly pricing.[3]

Chapter 6 of the NER sets out the requirements, timelines and processes for the economic regulation of distribution networks. Every five years, a DNSP is required to provide information to the AER for assessment and approval in respect of the total revenue that a DNSP can achieve for its network. This information includes expenditure forecasts which are a component of a DNSP's building block proposal.

A building block methodology is used to calculate the total regulated revenue for a distribution network that will provide the opportunity for a DNSP to recover at least the efficient costs of providing its regulated services.[4] This approach requires summing the indexation of the regulatory asset base and forecasts of the return on capital, depreciation, cost of corporate income tax, revenue increments or decrements resulting from the operation of an incentive scheme and the operating expenditure of a specific business.

Operating expenditure forecasts are estimates of the running costs that a regulated business expects to incur to provide its services, while capital expenditure forecasts are estimates of the fixed (or physical) assets that a regulated business expects to invest in to provide its services.

DNSPs are required to prepare operating and capital expenditure forecasts in accordance with the expenditure objectives and other requirements set out in clauses 6.5.6 and 6.5.7 of the rules respectively. These objectives require that the expenditure forecasts meet expected demand, comply with all applicable regulatory obligations, maintain the quality, reliability and security of supply of the standard control services, as well as maintain the reliability, safety and security of the distribution network.

Other requirements include compliance with any relevant regulatory information instruments and the AER's cost allocation guidelines, as well as a total forecast figure for the regulatory period and a forecast figure for each year within that regulatory period.

3 The Economic Regulation Authority regulates networks in Western Australia and the Utilities Commission regulates networks in the Northern Territory. These jurisdictions are not part of the NEM.

4 Section 7A of the NEL sets out the revenue and pricing principles that guide this approach.

3 Details of the rule change request

3.1 Subject matter of the rule change request

The rule change request relates to electrical energy losses on distribution networks. It seeks to add a requirement to the rules that the cost of network losses must be considered by DNSPs in preparing their operating and capital expenditure forecasts.

As a component of a revenue proposal, operating and capital expenditure forecasts are prepared by DNSPs for assessment by the AER as part of the revenue determination process.

The rule change request was accompanied by a paper prepared by Harry Colebourn entitled "*The cost of losses for future network investment in the new networks regime*" as supporting analysis on the calculation of the long run cost of electrical energy losses.

3.2 Issues that the rule change request seeks to address

The proponent claims that the NEM regulatory framework does not make DNSPs responsible for the cost of losses within their networks. CDC further notes that there is no requirement for the AER, when assessing a DNSP's revenue proposal, to ensure that the cost of losses has been considered.

As a result, the proponent suggests that these businesses do not consider the cost of losses when making investment decisions. It further suggests that the economic incentives within the rules encourage DNSPs to reduce their operating and capital expenditure. CDC believes that this results in an economically inefficient outcome as the long-term cost of losses is not considered as a cost in the original investment decision.

The rule change request does not seek to change the treatment of transmission network losses. The proponent suggests that the value of transmission losses is less substantial than distribution losses as they are generally in the range of one to three per cent of electricity transported through the network. CDC also notes that there is an existing mechanism in transmission that requires consideration of the cost of losses for investments subject to the Regulatory Investment Test for Transmission (RIT-T).[5]

3.3 Description of the proposed rule

The Proponent's rule change request includes a proposed rule to amend clauses 6.5.6(b) and 6.5.7(b) which set out the operating and capital expenditure objectives respectively.

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5 The rules require that investments over $5 million be subject to a RIT-T unless otherwise exempted under 5.6.5C(a) of the NER.

The proposed rule adds sub-clauses 6.5.6(b)(1A) and 6.5.6(b)(1A) to these objectives to require a DNSP to consider the cost of electrical energy losses in the distribution system in preparing operating and capital expenditure forecasts.

Under clauses 6.5.6(c) and 6.5.7(c), the AER is required to accept a DNSP's operating and capital expenditure forecasts if it is satisfied that the expenditure criteria has been met. Expenditure criteria includes the efficient costs of achieving the expenditure objectives, the costs that a prudent operator would need to achieve the expenditure objectives and a realistic expectation of the demand forecasts and cost inputs required to achieve the expenditure objectives.

As the proposed rule adds sub-clauses to the expenditure objectives, it would have the effect of requiring the AER to assess whether the cost of distribution network losses had been given appropriate consideration in a DNSP's expenditure forecasts.

4 Assessment framework

The Commission's assessment of this rule change request must satisfy the rule making test which considers whether the proposed rule will, or is likely to, contribute to the achievement of the NEO. The NEO, as set out under section 7 of the NEL, states that:

"*The objective of this Law is to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to –*

(a) price, quality, safety, reliability and security of supply of electricity; and

(b) the reliability, safety and security of the national electricity system."

The Commission will also consider other relevant parts of the NEL such as the revenue and pricing principles set out in section 7A of the NEL. These principles state that a network service provider should be provided with the opportunity to recover at least the efficient costs that it incurs in providing its services. These principles also state that a network service provider should be provided with efficient incentives to promote economic efficiency with respect to the services it provides.

In assessing the rule change request against the NEO and the revenue and pricing principles, the AEMC will inform its decision making by taking the following issues into consideration:

- the ability of the proposed rule to promote efficient investment in distribution networks;
- the ability of the proposed rule to promote efficient operation of distribution networks;
- the effect of the proposed rule on the operational and administrative costs of DNSPs and the AER; and
- the potential implications of the proposed rule on the cost of electricity services.

The effect of the proposed rule on these criteria will then be compared to the counterfactual. The counterfactual includes the current requirements under chapter 6 of the rules in relation to the economic regulation of distribution networks.

5 Issues for consultation

Taking into consideration the assessment framework, this chapter discusses a number of issues relevant to this rule change request. These issues are provided for guidance and stakeholders are encouraged to comment on these issues, as well as any other aspect of the rule change request (including the supporting analysis) or this consultation paper.

5.1 Materiality of the issues raised in the rule change request

As part of the assessment of this rule change request, it is important to understand the materiality of the issues that the proposed rule seeks to address. This is particularly true since a trade-off exists between the marginal benefit of reducing network losses and the marginal expenditure required to reduce them.

CDC claims that DNSPs do not consider the value of losses on their networks because they are not financially responsible for the cost of those losses. It further suggests that the economic incentives within the rules encourage DNSPs to reduce their operating and capital expenditure. CDC suggests that this leads to economically inefficient outcomes where DNSPs make investment decisions that have not taken into account the long term cost of losses.

Expenditure forecasts are one component of a building block proposal. The combination of these components is designed to spread expenditure over the regulatory period in an efficient manner. However, CDC suggests that the current framework encourages DNSPs to reduce their capital and operating expenditure. The proponent notes that when a capital allowance is overspent, the asset is rolled into the Regulatory Asset Base at its depreciated value at the next regulatory review. But if a capital allowance is underspent then a DNSP retains the return on and return of capital of its revenue allowance.

The proponent further notes that if operating expenditure is overspent, then it is not reimbursed but if it is underspent then the allowance is retained until the next regulatory review. CDC proposes that the current regulatory framework incentivises DNSPs to limit their operating expenditure to less than the regulatory allowance approved by the AER.

The AER has a mechanism in place to address the timing incentive relating to operating expenditure. The rules require the AER to publish an Efficiency Benefit Sharing Scheme (EBSS) in relation to operating expenditure.[6] An EBSS is a mechanism that shares between a DNSP and its customers the efficiency gains or losses derived from the difference between a DNSP's actual operating expenditure and the forecast operating expenditure allowance for any one year. The rules also state that an EBSS may (but is not required to) cover efficiency gains and losses related to capital

6 See clause 6.5.8(a) of the NER.

expenditure or distribution losses.[7] The AER does not currently apply the EBSS to capital expenditure or distribution losses.[8]

It is important to understand the costs associated with the issues raised in the rule change request. The proponent suggests that the value of losses is substantial and largely recovered from customers connected to the network.[9] However, the proponent also states that for many of the capital and operating project decisions made by DNSPs, the incremental losses due to an investment would be zero or immaterial.[10] This may mean that the proposed rule would only impact few projects where the cost of losses has a substantial impact.

Question 1

(a) Is there evidence that DNSPs do not consider the cost of electrical energy losses when making capital and operating expenditure forecasts?

(b) Do the rules provide effective incentives for DNSPs to make efficient capital and operating expenditure decisions? If so, what are these incentives?

(c) To what extent does the EBSS impact on a DNSP's consideration of the cost of losses?

(d) Do distribution losses significantly contribute to the price of electricity to consumers? If so, how much do they contribute and does this materiality vary between networks?

5.2 Existing energy efficiency programs and measures

There are existing energy efficiency programs and measures that seek to address energy losses and energy efficiency more broadly. In assessing the rule change request, it is important to consider the degree to which these measures address, or are likely to address, the issues raised in this rule change request.

The Australian Government's Clean Energy Future policy package included an extension of Energy Efficiency Opportunities (EEO) program to electricity and gas transmission and distribution network businesses. From 1 July 2012, network businesses which use more than 139,000 megawatt hours (or 0.5 petajoules) of energy (inclusive of network losses) in a financial year will be required to register for the EEO program.

Participants in this program (which will include DNSPs) are required to undertake detailed energy assessments in order to identify opportunities to improve their energy

7 See clause 6.5.8(b) of the NER.

8 AER, *Electricity Distribution Network Service Providers Efficiency Benefit Sharing Scheme*, June 2008, page 8.

9 See section 3 of the rule change request, page 4.

10 See section 5 of the rule change request, page 12.

use, and to report publicly on the outcomes.[11] The extension of this program may also include consideration of a direct financial incentive or benefit transfer scheme which would reward businesses for reductions in network losses.[12] The details of proposed changes to the EEO program in respect of energy network businesses are expected to be released in late May 2012 in anticipation of the obligations commencing on 1 July 2012.

The Minimum Energy Performance Standards (MEPS) program is a joint initiative between the Australian, State, Territory and New Zealand Governments. This program sets minimum energy performance standards for certain products, which are enforced by state government legislation and regulations applicable to the relevant Australian or Australia/New Zealand Standards.[13]

Since 1 October 2004, distribution transformers have been subject to MEPS requirements.[14] These requirements are likely to impact on losses as transformers are the second largest loss-making component in distribution networks.[15] Negotiations are underway on phase two of the MEPS to increase mandatory efficiency performance standards for distribution transformers. The effect of these new standards would be a reduction in the long term losses from distribution transformers.[16]In assessing this rule change request, it will be important to consider the impact of this program on the issues raised in the rule change request.

Question 2

(a) How might the extension of the EEO program to distribution networks address the concerns raised in the rule change request by CDC?

(b) To what extent do the requirements on distribution transformers under the MEPS program encourage DNSPs to minimise distribution losses?

(c) Do the requirements on distribution transformers under the MEPS program influence the broader network equipment decisions of DNSPs?

11 Further information on this program is available from www.ret.gov.au.

12 Department of Resources, Energy and Tourism, *Options Paper on Extension of the EEO Program to Energy Transmission and Distribution Networks*, 21 February 2012.

13 See http://www.energyrating.gov.au/.

14 Specifically, all single and three phase, dry and oil immersed transformers with a power rating between 10kVA and 2500kVA that are designed for 11kV and 22kV distribution networks.

15 The largest contributor being the losses that occur in the transport of electrical energy through distribution lines.

16 Australian Government, *Consultation Regulatory Impact Statement: Review of Minimum Energy Performance Standards for Distribution Transformers*, May 2011.

5.3 Ways to address the issues raised in the rule change request

There are several ways to provide incentives to influence the behaviour of regulated businesses, including direct economic incentives and regulatory instruments. The proposed rule seeks to impose a requirement on DNSPs to value the cost of losses for each investment input.

In the rule change request, CDC notes an alternative option in which DNSPs would be responsible for the purchase of losses on their networks.[17] CDC states that it has not suggested this option as a proposed rule as it claims it would represent a significant change to the existing market framework and the risk profile of network businesses. The proponent further notes that a direct regulatory incentive is problematic in determining the value of a loss incentive due to the time lag in meter reading.[18]

However, incentive schemes are used in other energy markets. For example, Great Britain's energy regulator (Ofgem) includes a losses incentive mechanism as part of its electricity distribution price control.[19] Under this mechanism, distribution businesses are rewarded or penalised based on their performance against an allowed loss percentage.

As part of its assessment, the Commission will consider the ability of the proposed rule to address the issues raised in the rule change request. The proposed rule would add an additional requirement to the expenditure forecast process. These forecasts include a total figure for the regulatory period and an annual figure for each regulatory year in that period. Once these expenditure allowances are approved by the AER, it is possible that a DNSP's actual expenditure will differ from its forecast expenditure. Therefore, it will be important to consider impact of the proposed rule on the actual operating and capital expenditure of DNSPs where the cost of losses is material.

The rule change request does not seek to change the treatment of transmission network losses. The proponent suggests that the value of transmission losses is less substantial as they are generally in the range of one to three per cent of electricity transported through the network.[20] CDC also notes that there is an existing mechanism in transmission that requires consideration of the cost of losses for investments subject to the RIT-T.[21]

17 See section 3.1 of the rule change request, page 4.

18 See section 3.2.2 of the rule change request, page 8.

19 See www.ofgem.gov.uk.

20 See section 3 of the rule change request, page 4.

21 The rules require that investments over $5 million be subject to a RIT-T unless otherwise exempted under 5.6.5C(a) of the NER.

Question 3

(a) Will the proposed rule result in DNSPs considering the cost of network losses in preparing their capital and operating expenditure forecasts?

(b) Are there any alternatives to the proposed rule that may better address the issues raised in the rule change request?

(c) Should a similar requirement to the proposed rule be considered for transmission networks?

5.4 Costs and benefits of the proposed rule

As outlined in chapter four, the Commission's assessment of this rule change request must satisfy the rule making test which considers whether the proposed rule will, or is likely to, contribute to the achievement of the NEO. In doing so, consideration is given to the likely costs and benefits of the proposed rule.

The rule change request includes a qualitative assessment of the impact of the proposed rule. CDC suggests that there would be no additional administrative costs for DNSPs where the cost of losses is immaterial. Where the cost of losses is material, the proponent does not believe that the inclusion of these calculations would impose material additional administrative costs on DNSPs. The proponent further suggests that there would be no additional administrative burden or cost to the AER in assessing a DNSP's compliance with the proposed rule.

In terms of the impact of the proposed rule on the expenditure of DNSPs, CDC notes that the proposed rule would increase a DNSP's operating and capital costs for projects where the cost of losses is considered material. Since these costs form part of a DNSP's revenue determination, this could increase a DNSP's revenue requirements (which is ultimately recovered from consumers).

However, the proponent suggests that in the long-term the proposed rule will reduce the cost of electricity supply (due to improvements in the efficiency of networks) which is likely to result in long-term reductions in the price of electricity to consumers.

Question 4

(a) What are the likely implementation and ongoing costs associated with the proposed rule for DNSPs and the AER?

(b) Is the proposed rule likely to result in more efficient expenditure which could lead to lower electricity prices for consumers over the long term?

5.5 Relationship of this rule change request to other rule change requests

The AEMC is currently considering two other rule change requests that relate to the economic regulation of distribution networks. In making a determination, the Commission will consider the interaction, where relevant, between this rule change request and these rule change requests.

The Distribution Network Planning and Expansion Framework rule change seeks to implement a national framework for electricity distribution network planning and expansion. The proposed national framework includes a Regulatory Investment Test for Distribution (RIT-D) which would replace the current Regulatory Test.

The RIT-D process, if implemented, would provide a framework for DNSPs to consider a range of investment options to address a need on their network. Under the proposed rule, a RIT-D process would be relevant where a distribution system limitation exists and the estimated capital cost of the most expensive option to address the relevant identified need is $5 million or more.

The proposed RIT-D principles would require DNSPs to consider changes in electrical energy losses (as a class of market benefit) that could be delivered by an investment option to address an identified need. In effect, this means that DNSPs would be required to consider the cost of losses for all investments that meet the RIT-D requirements.

In the rule change request, CDC suggests that the proposed rule would be complimentary to the requirements of the proposed RIT-D as it would require DNSPs to consider the cost of losses on all capital and operating expenditure, including smaller capital investment projects which are below the proposed RIT-D cost threshold of $5 million.

As part of the proposed Distribution Network Planning and Expansion Framework rule change , the AER will be required to publish RIT-D application guidelines. These guidelines, similar to the RIT-T application guidelines, will provide guidance and worked examples on the classes of market benefits (including electrical energy losses) to assist DNSPs in undertaking a RIT-D process.

CDC provided a submission to the consultation paper for the Distribution Network Planning and Expansion Framework rule change. The issues raised will be addressed in the draft determination for that rule change request. However CDC sees the changes in that submission and this rule change request working together. In its rule change request, CDC suggests that the guidance to be provided by the proposed RIT-D application guidelines, with respect to ascribing a value to the cost of losses, would lead to considerably less diversity in a DNSP's analysis of expenditure forecasts which are the subject of this rule change request.

The Economic Regulation of Network Service Providers rule change is a consolidation of rule change requests from the AER and a group of large energy users. It seeks to

change the way regulated revenues are set for electricity and gas network businesses. Any interactions between that rule change request and the rule change request discussed in this consultation paper will be considered as part of this rule change process.

Question 5

(a) How material is the cost of losses to the expenditure by DNSPs that would not be captured under the requirements of the proposed RIT-D?

(b) To what extent would the guidance and worked examples proposed to be provided by the AER in the RIT-D application guidelines help determine the value ascribed by DNSPs under this proposed rule if implemented?

6 Lodging a submission

The Commission has published a notice under section 95 of the NEL for this rule change proposal inviting written submission. Submissions are to be lodged online or by mail by 31 May 2012 in accordance with the following requirements.

Where practicable, submissions should be prepared in accordance with the Commission's Guidelines for making written submissions on rule change proposals.[22] The Commission publishes all submissions on its website subject to a claim of confidentiality.

All enquiries on this project should be addressed to Caroline Taylor on (02) 8296 7800.

6.1 Lodging a submission electronically by mail

Electronic submissions must be lodged online via the Commission's website, www.aemc.gov.au, using the "lodge a submission" function and selecting the project reference code "ERC0142". The submission must be on letterhead (if submitted on behalf of an organisation), signed and dated.

Upon receipt of the electronic submission, the Commission will issue a confirmation email. If this confirmation email is not received within three business days, it is the submitter's responsibility to ensure the submission has been delivered successfully.

6.2 Lodging a submission by mail

The submission must be on letterhead (if submitted on behalf of an organisation), signed and dated. The submission should be sent by mail to:

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Or by fax to (02) 8296 7899.

The envelope must be clearly marked with the project reference code "ERC0142".

Except in circumstances where the submission has been received electronically, upon receipt of the hard copy submission the Commission will issue a confirmation letter.

If this confirmation letter is not received within three business days, it is the submitter's responsibility to ensure successful delivery of the submission has occurred.

22 These guidelines are available on the Commission's website at www.aemc.gov.au.

Abbreviations

AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
CDC	Copper Development Centre
Commission	See AEMC
DLFs	Distribution Loss Factors
DNSPs	Distribution Network Service Providers
EBSS	Efficiency Benefit Sharing Scheme
EEO	Energy Efficiency Opportunities
MEPS	Minimum Energy Performance Standards
NEL	National Electricity Law
NEM	National Electricity Market
NEO	National Electricity Objective
NER	National Electricity Rules
Proponent	See CDC
RIT-D	Regulatory Investment Test for Distribution
RIT-T	Regulatory Investment Test for Transmission
Rules	See NER