



**Initial Default Price-Quality Path for
Gas Pipeline Businesses**

Discussion Paper

27 May 2011

INTRODUCTION

- 1 Powerco welcomes the opportunity to comment on the *Initial Default Price-Quality Path (DPP) for Gas Pipeline Businesses Discussion Paper*, published 1 April 2011 (Discussion Paper). We have limited our submission to issues related to Gas Distribution Businesses (GDBs).
- 2 The open approach the Commission has taken to developing the DPP is to be commended and means that GDBs have been able to provide detailed input at various stages and this is reflected in the final document.
- 3 The Commission has proposed a price path that mirrors the electricity DPP. Powerco supports this as it is a well understood process, which will smooth the transition from the Gas Authorisation. There are a few issues over how this process will work in practice and these are outlined in the attached document. If any issues raised are unclear or would benefit from further discussion we will be happy to provide more information.
- 4 Overall Powerco views the Commission's proposal as a pragmatic solution, given the challenges of incomplete datasets on which to establish the price path and the complexity of measuring 'quality' of gas networks. We hope that the Commission will continue to take opportunities to work with distribution businesses over the DPP period to develop the model further for subsequent price periods.
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COMPLIANCE WITH THE PRICE PATH

- 6 Powerco's main aim is to submit compliance statements in a manner that meets the needs of the Commission and minimises costs. Depending on exactly how the Commission calculates the initial DPP, Powerco has a concern that a year of pass through costs may be missed (July 2010 – June 2011). This is due to the Gas Authorisation having a greater lag than the proposed DPP.
- 7 Under the Authorisation, pricing for October 2011 – September 2012¹ uses pass through costs from July 2009 – June 2010. The proposed equation in the DPP uses K_t and K_{t-1} which means for the initial DPP of July 2012 – October 2012, the pass through costs used will be those from July 2012 – October 2012. This means that pass through costs from July 2010 – June 2011 are not covered by either the Gas Authorisation or the DPP.
- 8 This can be solved by allowing Powerco to recover the missed year of pass through costs either in the first year of the DPP, by amortising it over the DPP period or by amending the formula to use pass through costs from the previous year (i.e. lag pass through costs by two years in the DPP – K_{t-1} and K_{t-2}).
- 9 Similarly, clarification of the recoverable cost, CPI and quantity periods to be used in the DPP would be of use.
- 10 Powerco is content with the '3+12' compliance period from July 2012 to September 2013 but seeks confirmation of whether compliance should be submitted in May 2014 and if not when it will be scheduled.

REGULATORY PERIOD START DATE

- 11 The difference between the start of the gas distribution businesses (GDB) financial year (1 July) and gas price changes (1 October), creates a number of options on when the regulatory period, pricing period, and information disclosure period should begin. The Commission has asked for Powerco's preference.
- 12 Powerco has concluded that the best option is to align all periods to begin on 1 October, with the exception of the AMP. We recommend that GDBs are able to choose either an October/September or July/June period for the AMP, as long as it includes a table with expenditure forecasts covering the October/September period. This is because:
 - 12.1 While submitting a financial disclosure for the period Oct/Sept creates more work, gas is a discretionary fuel and the needs of consumers and retailers come first. A 1 October price change promotes these interests.
 - 12.2 We recognise there are a number of benefits of aligning the regulatory and information disclosure period, for example, ensuring that the ROI for a period reflects one set of prices.

¹ While the Authorisation ends on 1 July 2012, pricing will have been set on 1 October 2011 as if the regulatory period was one year.

- 12.3 For Powerco, AMPs are documents intended to be widely used internally and an integral part of the asset management process. Requiring the document to cover a period that does not align with the financial year hinders this process. Due to the gas sector's small size, practicable measures must be taken to reduce compliance costs. Powerco finds it onerous to produce an electricity AMP that serves the business and meets regulatory requirements. This is an opportunity to solve the issue for gas.
- 12.4 The impact of having a different period with the regulatory/ pricing/ information disclosure is minor with the AMP. The main information overlap is reporting and explaining variances over 10% between the reconciliation of actual expenditure with the previous years forecast expenditure.
- 12.5 If the Commission requires reconciliation of actual capex and opex with forecasted capex and opex, the periods of financial disclosure and AMP forecasts need to align. As the actual expenditure will be audited under the financial templates, it is more efficient to require the AMP to include forecasts that cover the Oct/Sept period.
- 12.6 In addition, by giving a choice of dates, it leaves open the possibility that a business may choose to disclose the AMP over the October/September year. For example, if a businesses' financial year changed, the regulations would accommodate moving the AMP start date.

RATES OF CHANGE

X Factor

- 13 Powerco recognises the challenge in setting the X-factor for GDBs and regard the value of zero as being higher than we believe would be appropriate for the industry, but acceptable. We have reviewed the Economic Insights report and note the numerous challenges faced in establishing a figure for the total factor productivity (TFP) of the New Zealand gas industry. The sensitivity of the outcome to the method used, the data selected and the inconsistencies in the data are all of concern and the report notes the material impact they can have; exemplified by the variation in results between cost and revenue weighting. As further years' data becomes available, through the quality measures discussed below and information disclosure, we hope more robust TFP studies can be conducted.
- 14 The gas industry has been through a difficult period and continues to face increasing competition from alternative technologies e.g. heat pumps. The volume of gas used is not as closely linked to the performance of the economy as electricity and hence recovery in the gas industry is likely to lag behind that of the rest of the economy. This would suggest a lower total factor productivity over the DPP period. Of particular concern is the Economic Insights Powerco TFP calculation of -2.41%. This would suggest to us that a negative X value would be more appropriate.
- 15 Powerco believes that in the absence of an appropriate data-series and given the issues associated with calculating it better, it meets the purpose statement of the Act to be conservative in setting the X factor. To this end Powerco would suggest a slightly negative value for X. Proposed Information Requirements

- 16 The Commission has listed over 130 pieces of information in Appendix A of the Issues Paper that it states may be useful to calculate GDB TFP. Powerco does not dispute that this information may be 'useful', but requests that the Commission undertakes further work before increasing the reporting requirements for GDBs. While it is important that the TFP calculation is as robust as possible, any information provided will have an accompanying cost, which is ultimately passed to the consumer.
- 17 We note that Appendix A is taken from a "wish list" by Economic Insights created as part of the current Australian Energy Market Commission (AEMC) review of TFP. No Australian regulator currently requires this information and there is no certainty this data will be mandated in Australia.
- 18 Powerco has reviewed each measure and provided comment in Appendix A of this submission. Many of the measures are already required in information disclosure, or will be under the Gas Distribution Input Methodologies Determination. There are a number of new measures however and we have the following observations and issues:
- 18.1 *Measures related to normalisation*: There are a number of measures that we assume are included to normalise the TFP data. We note Dr Lawrence states that, "operating environment conditions can have a significant impact on distribution costs and productivity and in many cases are beyond the control of managers. Consequently to ensure reasonably like-with-like comparisons it is desirable to "normalise" for at least the most important operating environment differences"². We do not consider normalisation is required in New Zealand, as gas distribution companies' productivity is not being compared to each other, in fact it is restricted in the Commerce Act. The aim is to establish an average productivity change over time.
- 18.2 *Categories of expenses and assets*: The categories need to be changed to reflect the Gas Distribution Input Methodology Determination. The IM expenditure and asset categories have already been consulted on and disclosing them annually provides a historical time series to inform a CPP application.
- 18.3 Number of staff and labour costs: due to the use of outsourcing, this measure is not appropriate and Powerco does not collect this information from its contractors. For example, Dr Lawrence states that, "some North American studies have separated opex into labour and materials and services. However, with the increase in contracting out, separate measures of labour input have become increasingly difficult to obtain and potentially unrepresentative"³.

² Denis Lawrence, *The Productivity Performance of Envestra's South Australian and Queensland Gas Distribution Systems*, 30 September 2010, p13.

³ Denis Lawrence and John Kain, *Assessment of Data Currently Available to Support TFP-based Network Regulation*, 9 June 2009, p14.

QUALITY

Standards

- 19 Powerco welcomes the use of Performance in Emergency Response as the standard for the gas DPP. However, we do have some concerns over the use of percentage of responses in less than 60 minutes as the metric. Powerco's emphasis is on operating a safe network and we have performed well: outperforming the 95% target in each year of the Gas Authorisation. However, the number of emergency incidents in a year is typically very low (ca. 120) and therefore significant percentage variances can result from only small changes in actual performance.
- 20 The causes of a large proportion of emergency incidents are out of the control GDBs, as they are often the result of third party damage. If during the DPP period there is a reduction in the number of incidents then the percentage attendance under 60 minutes becomes increasingly sensitive to one-off events. For example if there were only 49 emergency incidents and, due to events beyond our control (e.g. heavy traffic, possibly caused by the incident in question) on two occasions attendance took over 60 minutes we would be in breach and have limited ability to rectify this in year. Powerco would therefore suggest that the Commission consider whether it would be more appropriate to redefine a breach to be a failure to meet the standard in two out of three years, in the same manner as quality measures are treated in the electricity DPP. It is important to Powerco that we have a high degree of certainty as to how breaches will be treated. A breach, or a situation where we are close to breaching is a serious issue for us and our Directors. Having clear statements in the DPP as to what exactly will constitute a breach and how such an event would then be treated would be welcomed.
- 21 In order to meet the aim of the Commerce Commission in ensuring no material degradation in performance under the DPP, we propose that the Commission consider collecting data on average response times to emergencies in order that their use may be investigated as a more robust measure. This measure has the advantage of incentivising distribution businesses to further optimise response processes and maintain focus on speed of response, rather than attending in less than 60 minutes. To enable this, the Commission may consider including response times as a 'measure' under the DPP so they have the necessary data on which to base a standard in future. This would also provide further context to any change in performance against the 95% response to emergency in less than 60 minutes standard.
- 22 Table 1 contains Powerco's average response times and percentage response time under 60 minutes for the last three years, along with the number of emergency events. These figures outline how the percentage response under sixty minutes does not give the whole picture; in the last two years the numbers suggest average response times have been the same but the percentage under sixty minutes has improved.

Measure	Year		
	2008/2009	2009/2010	2010/2011*
< 60 minutes	96.12%	95.04%	97.26%
Average response time	0:22	0:24	0:24
Total number of events	129	121	73
Not responded to within 60 minutes	5	6	2

*2010/11 data does not represent a full reporting year and is provided for reference purposes

Fig 1 Powerco emergency response time statistics

- 23 In addition we suggest a minor amendment to the definition of an 'Emergency' to allow for instances when the emergency services are in attendance, but the presence of a GDB engineer is not required. Examples of instances when this might apply include: the emergency services concluding there is no leak, identify a non-network source of a leak (e.g. bottled gas) or being able to safely isolate the supply without the need for an engineer, a task often undertaken by the fire service. This will enable GDB resources to be prioritised to incidents where their immediate attendance is required, without compromising safety. We would suggest amending the definition in section 7.32 by including the section in italics below:

"An emergency would be defined as an incident for which one of the emergency services (police, fire service, etc.) is called and deems the immediate attendance of a gas distribution business engineer is required."

Measures

- 24 The use of 'measures' is welcomed as a pragmatic approach by the Commission to the complex issue of quality in the Gas DPP. There is no single measure which provides information on the quality of the network and service provided by a GDB and including a number of measures will allow the Commission to monitor a 'dashboard' of performance and GDBs to provide greater context for their performance in the event that a particular measure fluctuates significantly.
- 25 Under the Gas Authorisation Powerco reported 'Leaks' as the total number of leaks detected divided by the total length of network. Under the DPP this has been changed to be the total number of leaks detected divided by the length of pipeline surveyed. The length of pipeline surveyed in a given period can vary significantly and providing accurate data can be a challenge. This leads to fluctuations in the figures which, despite appearance, have no bearing on quality. We therefore recommend that this definition be reverted to align with that under the Authorisation to ensure consistency in reporting.

Reporting Quality in DPP Compliance Statement

- 26 Powerco understands that it is the Commission's intent that both the quality 'standard' and 14 'measures' outlined in the DPP should be included in the annual compliance statement. These statements are a significant undertaking for distribution businesses and our Directors take their responsibilities in signing them very seriously. Some of the measures included have little or no link to quality or performance of a GDB; their inclusion in the compliance statement gives them

weight above that which is appropriate. Powerco would therefore request that the Commission considers whether a number of the measures may be more appropriately included in the Information Disclosure as opposed to the compliance statement.

- 27 We understand that there is no single measure which reflects overall quality and each measure has its drawbacks. It is therefore important that the Commission has a suite of measures which allow GDBs to provide context for any variation in apparent performance. It is our view that:
- a. publicly reported escapes
 - b. emergency response times
 - c. leaks
 - d. third party damage events
 - e. outage events
 - f. outage events caused by third parties
 - g. SAIFI

are the best measures of network quality. Additional to these the answering of telephones provides a measure of the customer service provided by the network and therefore is of relevance to overall performance.

- 28 We feel that unaccounted for gas (UFG), poor pressure events due to network causes and complaints should not be included in the DPP. To do so would suggest to those without a detailed knowledge of the industry that they reflect the quality or performance of the GDB network, which would be unfair. UFG has been shown to be largely a measure of variations in meter reading, within the system. Poor pressure events have negligible impact on consumers; low pressure would rarely be noticed by a consumer, unless pressure dropped which would lead to supply being cut and will hence be recorded as an outage. The number of complaints received about gas supply is very small (average of 10 for each of the last seven years) and variations in this number do not reflect quality of the network and would be better published under information disclosure. Publishing these figures under information disclosure will ensure they are publicly available while avoiding confusion over whether variation in the numbers themselves reflects a change in actual quality.
- 29 Continued collection and publication of measures consistent with the Gas Authorisation will ensure that the information which has built up over the last few years can continue to grow and enable more statistically robust thresholds to be established in future. The use of 'measures' in this area provides a useful mechanism for the Commission to monitor performance whilst acknowledging the statistical fragility of some of the measures themselves and enabling more open discourse of the challenges.

Appendix A

No.	Measure	Comment	Include?
OUTPUTS			
	Total		
1	Energy – TJ per annum	Already disclosed annually	√
2	Maximum hour – TJ / hr	Information available at the total company level. Much of the source data is from other companies so we can't verify the accuracy of information. Note that this data is not the maximum flowrate but the maximum hourly flow. This information requirement needs to align with the outcome of the pipeline capacity discussions.	?
3	Distribution Revenue – \$M	Already disclosed annually	√
4	Number of Customers – no.	Already disclosed annually	√
	Domestic Volume Based Tariffs	Powerco does not distinguish between domestic and non domestic. Eg Powerco's G11 load group is mixed. Would need to make assumptions to allocate. Powerco's pricing is not solely based on volume - the consumer's maximum capacity determines their load group and the load group determines their day and volume charge.	
5	Energy – TJ per annum	As long as domestic/ non domestic issues resolved, can be disclosed. This information requirement needs to align with the outcome of the pipeline capacity discussions.	√
6	Maximum hour – TJ / hr	Powerco is unable to provide this information at the domestic/ non-domestic and capacity level.	x
7	Distribution Revenue – \$M	See answer to 5.	√
8	Number of Customers – no.	See answer to 5.	√
	Non-domestic Volume Based Tariffs		
9	Energy – TJ per annum	See answer to 5.	√

10	Maximum hour – TJ / hr	See comment in no.6.	x
11	Distribution Revenue – \$M	See answer to 5.	√
12	Number of Customers – no.	See answer to 5.	√
	Capacity Based Tariffs		
13	Energy – TJ per annum	Powerco is not sure what the difference is between capacity and volume tariffs. We determine the consumer's load group by their maximum capacity and then charge on volume of gas used.	x
14	Maximum hour – TJ / hr		x
15	Distribution Revenue – \$M		x
16	Number of Customers – no.		x
17	<i>Revenue/penalties from S factor – \$m</i>	No schemes in NZ context so not relevant.	x
	<i>System Performance</i>		
18	SAIDI	Already disclosed annually, but do not think this should be part of TFP analysis.	√
19	SAIFI	Already disclosed annually, but do not think this should be part of TFP analysis.	√
20	No. of interruptions affecting ≤ 5 customers	Not currently disclosed, but could be calculated. We do not think this should be part of TFP analysis.	x
21	No. of interruptions affecting > 5 customers	Already disclosed annually, but do not think this should be part of TFP analysis.	√
22	<i>Unaccounted for Gas – %</i>	Already disclosed annually - although there are many issues with the accuracy of this figure as the source information is not very good. We do not think this should be part of TFP analysis.	√
INPUTS			
23	<i>Opex</i>	Already disclosed annually	√
24	<i>Total distribution opex – \$m</i>	Expected to be part of financial disclosure	√
25	<i>Shared allocation of opex to distribution – \$m</i>	Expected to be part of financial disclosure	√
26	<i>Operating expenses – \$m</i>		
27	Network Operations	These categories MUST mirror the opex categories in the Gas Input	x

28	Customer Connections	Methodology: - General management administration and overheads; - system management and operations opex; - routine and preventative maintenance; - fault and emergency maintenance opex; and - other opex.	x
29	Meter Reading Services		x
30	Billing and Revenue Collection		x
31	Advertising and Marketing		x
32	Regulatory Costs		x
33	Change in Provisions		x
34	Other Operating Costs (excl those below)		x
35	<i>Subtotal of above – \$m</i>	Already disclosed annually	√
36	<i>Maintenance expenses – \$m</i>	See comment 28.	
37	City Gate Stations	This categories MUST mirror the opex categories in the Gas Input Methodology: - General management administration and overheads; - system management and operations opex; - routine and preventative maintenance; - fault and emergency maintenance opex; and - other opex.	x
38	Transmission mains		x
39	Distribution mains		x
40	Services		x
41	Cathodic protection		x
42	Supply Regulators		x
43	Meters		x
44	SCADA and remote control		x
45	Other		x
46	<i>Subtotal of above – \$m</i>		Depends on definition
47	<i>Direct employees</i>	As Powerco outsources work this measure is not valid for TFP analysis.	x
48	<i>Number of full-time equivalent employees in operating and maintenance activities (including shared overhead allocation). Employee time spent on capital construction projects is to be excluded.</i>	Powerco outsources work this measure is not valid for TFP analysis.	x
49	<i>Direct labour cost – \$m</i>	Powerco outsources work this measure is not valid for TFP analysis.	

50	<i>Labour cost (including on-costs) of employees in operating and maintenance activities (including shared overhead allocation). Cost of time spent on capital construction projects is to be excluded.</i>	Powerco outsources work this measure is not valid for TFP analysis.	x
SYSTEM PHYSICAL DATA			
	<i>Distribution System Quantities and Capacity</i>	Due to Powerco being made of a number of different companies we have many different systems with different design and operating philosophies. It is difficult to see how this data will help the TFP study given this diversity.	
51	Transmission mains – over 1050 kPa g	In New Zealand transmission is defined as over 2,000 kPa or an authorised pipeline. Powerco has not mains over 2,000 kPa.	x
52	Weighted average of max sustainable pressure	This term is not used in New Zealand - we don't know what it refers to.	x
53	Weighted average of pipe diameter – mm	The Commission needs to specify the basis for weighting (age, length, volume), fully define pipeline with a definition that is relevant in NZ and state what diameter this refers to.	x
54	Pipeline Length – km	Currently disclosed annually.	x
55	High Pressure Distribution mains – up to 1050 kPa g	Powerco has different pressure classifications to these categories. Note with the Gas (Safety and Measurement) Regulations and the use of AS/NZS 4645 as a means of compliance, there is no standard pressure classification now.	
56	Weighted average of max sustainable pressure	See comment 52	?
57	Weighted average of pipe diameter – mm	See comment 53	?
58	Pipeline Length – km	We could disclose, but not sure how it would benefit TFP calculation.	?
	Medium Pressure Distribution mains – 20 to 210 kPa g	See comment 56	?
60	Weighted average of max sustainable pressure	See comment 52	?

61	Weighted average of pipe diameter – mm	See comment 53	?
62	Pipeline Length – km	See comment 58	?
	Low pressure distribution mains – to 7 kPa g		?
63	Weighted average of max sustainable pressure	See comment 52	?
64	Weighted average of pipe diameter – mm	See comment 53	?
65	Pipeline Length – km	See comment 58	?
	Pipeline length by material – km	Powerco has pockets of missing data due to predecessor companies not collecting the data. To collect this data would require excavating the pipe. We do not think this is required for TFP analysis.	x
66	Polyethylene		x
67	PVC		x
68	Protected Steel	The type of protection would need to be defined. Eg cathodic protection or just coated.	x
69	Unprotected Steel		x
70	Cast iron		x
71	Other		x
72	Service connections (from mains to customer)	Due to data conversions that have occurred since construction, Powerco has issues separating pipelines and services. The definition of a "service" also needs to be consulted on.	
73	Number		x
74	Length – km		x
75	City Gate Stations – number	Powerco does not understand what this term means. We don't own gate stations, so we think this is not applicable to us.	x
76	Field regulators – number	We are not sure what this is so can't comment.	?
77	District Regulators – number	Is this the number of regulators or the stations (1 station can have 4 regulators)?	?
	Meter Regulator Installations	We are not sure what this term means, but as meters are excluded under the Commerce Act this measure should not be included.	?

78	Meters over 10 cubic metres/hour		?
79	Meters up to 10 cubic metres/hour		?
ASSET VALUES			
	<i>Regulatory Asset Base Values – \$m</i>		
80	City Gate Stations	These categories should align with the Gas ODV Handbook 2005 and Schedule A of the IMs. As Powerco's RAB does not reflect the ODV results, the values will have to be pro-rated down in some way - it will be problematic. We do not think a TFP study requires this level of detail.	x
81	Transmission mains		x
82	High pressure distribution		x
83	Medium pressure distribution		x
84	Low pressure distribution		x
85	Cathodic protection		x
86	Services		x
87	Supply Regulators / Valve Stations		x
88	Meters		x
89	SCADA and other remote control		x
90	Other – IT		x
91	Other – non IT		x
92	Total – \$m		x
	<i>RAB Reconciliation – \$m</i>		
92	Opening value	Expected to be part of financial disclosure	√
93	Inflation addition	Expected to be part of financial disclosure	√
94	Regulatory depreciation	Expected to be part of financial disclosure	√
95	Physical additions (recognised in RAB)	Expected to be part of financial disclosure	√
96	Retirements	Expected to be part of financial disclosure (i.e. disposals)	√
97	Revaluation adjustments	Expected to be part of financial disclosure	√
98	Resulting summation for asset value	Expected to be part of financial disclosure	√
99	<i>Smoothed asset value wrt revaluations</i>	Not sure what this means?	

100	<i>Basis for initial RAB, e.g. DORC, adjusted DORC, historic cost, etc.</i>	This is stated in IM Determination, so does not need to be disclosed	x
101	<i>Have DORC valuations been undertaken? If so, for which years?</i>	This is stated in IM Determination, so does not need to be disclosed	x
	<i>Replacement Cost or Optimised Replacement Cost Asset Values – \$m</i>		x
102	City Gate Stations	See comments on RAB categories above. As all assets are valued at historic cost after 2005, this category is not relevant and requires an up to date ODV Handbook with replacement cost values.	x
103	Transmission mains		x
104	High pressure distribution		x
105	Medium pressure distribution		x
106	Low pressure distribution		x
107	Cathodic protection		x
108	Services		x
109	Supply Regulators / Valve Stations		x
110	Meters		x
111	SCADA and other remote control		x
112	Other – IT		x
113	Other – non IT		x
114	Total – \$m		
	<i>Actual Capital Expenditure – \$m</i>		
115	City Gate Stations	This categories MUST mirror the opex categories in the Gas Input Methodology: - Customer connection capex; - System growth capex; - Reliability, safety and environmental capex; - Asset relocations capex; and - Non-system fixed asst capex.	x
116	Transmission mains		x
117	High pressure distribution		x
118	Medium pressure distribution		x
119	Low pressure distribution		x
120	Cathodic protection		x
121	Services		x
122	Supply Regulators / Valve Stations		x

123	Meters		x
124	SCADA and other remote control		x
125	Other – IT		x
126	Other – non IT		x
127	Total – \$m		x
	<i>Asset Lives – estimated total and residual in years</i>		
128	City Gate Stations	In electricity Standard Asset Lives are provided in the 2004 ODV Handbook and updated in the Electricity IMs (Schedule A). This section must reflect IM.	
129	Transmission mains		
130	High pressure distribution		
131	Medium pressure distribution		
132	Low pressure distribution		
133	Cathodic protection		
134	Services		
135	Supply Regulators / Valve Stations		
136	Meters		
137	SCADA and other remote control		
138	Other – IT		
139	Other – non IT		
140	<i>Value of Capital Contributions or Contributed Assets – \$m</i>	Expected to be part of financial disclosure	v
141	<i>Price Index for Labour Inputs</i>	Do not think this is required	x
142	<i>Price Index for O&M Expenditure</i>	Do not think this is required	x
143	<i>Price Index for Network Assets</i>	Do not think this is required	x