ELECTRICITY AND GAS INFORMATION DISCLOSURE SEMINAR

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ASSET VALUATION Concepts and Practice

Presentation to Information Disclosure Seminar March 2013



Why have this session?

- Basic rules are contained in input methodologies (IMs)
- Who has studied the IMs before?
 - Sometimes detailed knowledge missing
 - Sometimes broader view missing
- Different rules existed prior to current information disclosure (ID) requirements
- This session is based on our experience so far ...



What will we cover today?

- Regulated asset base (RAB)
- Initial asset values
- Interaction with cost allocation
- RAB roll-forward
 - Revaluations
 - Depreciation
 - Asset acquisitions and disposals
- Special cases



Where are asset values used?

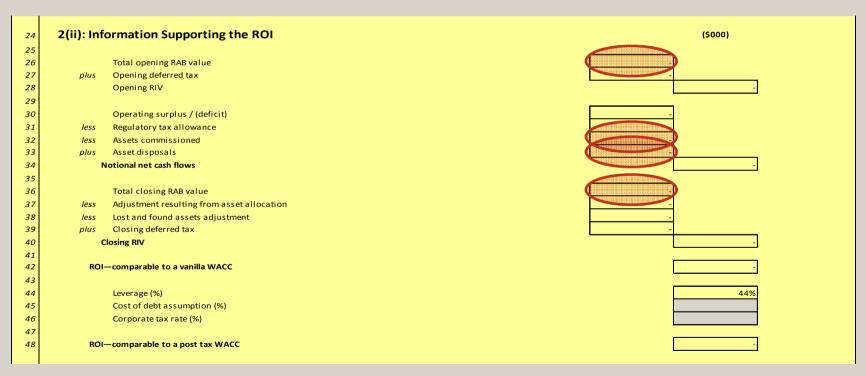
- IMs were required to be set for:

 "the valuation of assets, including depreciation and the treatment of revaluations" s 52T(1)(a)(ii) Commerce Act 1986
- Price-monitoring (ID) requires transparency of revenue components, including:
 - Opening RAB (Investment value)
 - Depreciation (Expense)
 - Revaluations (Income)
- Compare this to price-setting which requires a quantification of 'building blocks'



Where are asset values used in ID?

Schedule 2 of ID determination:





Where are asset values used in ID?

Schedule 3 of ID determination:

7	3(i): Regulatory Profit	(\$000)
8	Income	
9	Line charge revenue	
10	plus Gains / (losses) on asset disposals	
11	plus Other regulated income (other than gains / (losses) on asset disposals)	
12 13	Total regulatory income	
14	Expenses	
15	less Operational expenditure	
17	less Pass-through and recoverable costs	
18 19	Operating surplus / (deficit)	-
20 21 22	less Total depreciation	
23	plus Total revaluation	
25 26	Regulatory profit / (loss) before tax & term credit spread differential allowance	-
27	less Term credit spread differential allowance	_
28		
29	Regulatory profit / (loss) before tax	-
30		
31	less Regulatory tax allowance	-
32 33	Regulatory profit / (loss)	



Regulatory Asset Base (RAB)

- The RAB is a regulatory construct
 - Problem of circularity
 - RAB bears close resemblance to financial reporting
 - Methodology is Indexed Historic Cost (IHC)
- Individual or aggregated assets?
 - IMs require individual assets
 - ID generally requires aggregated



What is an asset exactly?

- Network and non-network assets
- Intangibles
- Land and easements
- Network spares
- Vested assets
- Works under construction
- Working capital
- Goodwill







What are the initial asset values?

- Take the 1 April 2009 asset values under prior ID
 - This is the deemed historic cost for IHC methodology
 - Note that values based mostly on prior ODV valuations
- For controlled gas companies, add in the Gas Authorisation asset values (updated from 2005)



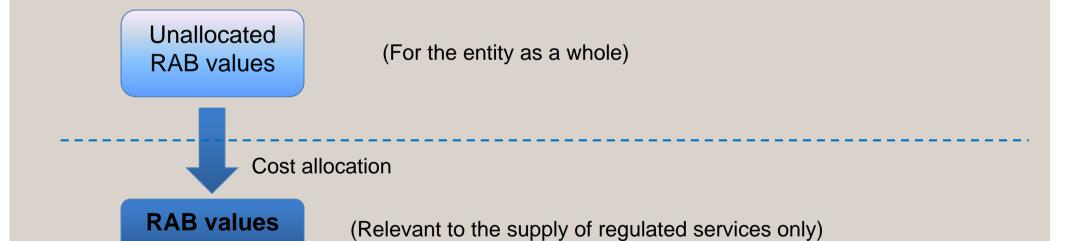
What are the initial asset values?

- Asset adjustment process one-off election
 - Include certain assets (eg load control relays)
 - Exclude things that are not 'assets' (see prior slide)
 - Correct errors in asset registers
 - Adjust some multipliers and optimisation/EV
- Results in:
 - Included, excluded, and value modified assets



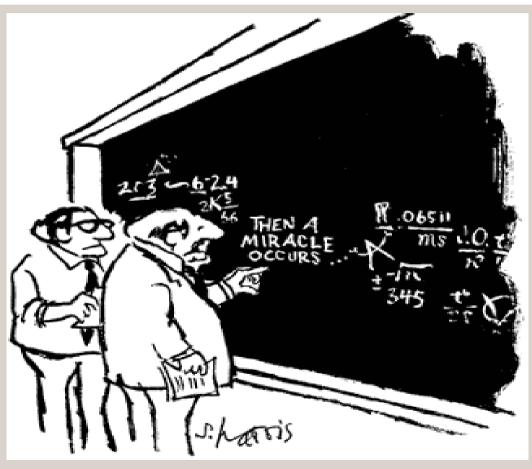
Unallocated and allocated values

Relationship with cost allocation



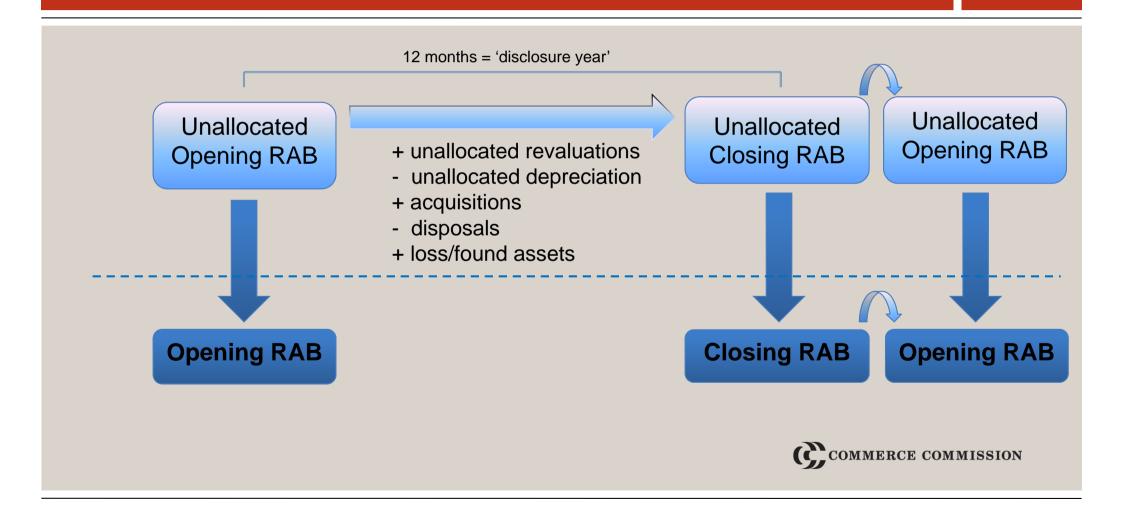


The RAB 'roll forward'





The RAB 'roll forward'



Revaluations

- The 'indexed' part of IHC methodology
- Current value indexed annually by the change in the Consumer Price Index (CPI)
- Multiply opening RAB value by 'revaluation rate'
 - Revaluation rate is change in CPI



Revaluations (cont)



Revaluations (cont)

- Revaluation must be treated as income for the purposes of determining profitability (ROI)
- No revaluations for:
 - fully depreciated assets
 - disposed assets
 - lost assets
- No periodic revaluations like GAAP



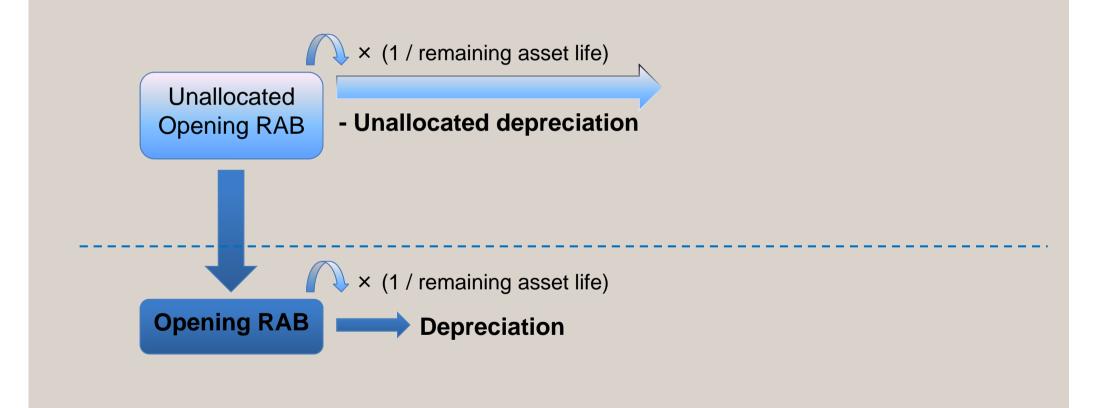
Depreciation

- Allocation of capitalised costs over time
- 'Diminution in an asset's remaining service life potential'
- Somewhat similar to GAAP and tax concepts
- Straight line methodology:
 - Remaining asset life
 - Opening RAB value
- IHC results in a constant real charge over asset lifetime
- Nil depreciation for land, easements, network spares



COMMERCE COMMISSION

Depreciation (cont)



Depreciation asset lives

- Initial assets = prior ID regime
- Assets after 2009



- Composite assets, dedicated assets, fixed life easements
- Independent engineer's reports
- Found assets

Standard Physical Asset Lives for EDB s	
ASSET DESCRIPTION	STANDARD PHYSICAI ASSET LIFE (YEARS)
SUBTRANSMISSION	
66kV, 50kV and 33 kV Lines:	
Concrete pole	60
Wood pole	45



Other depreciation matters

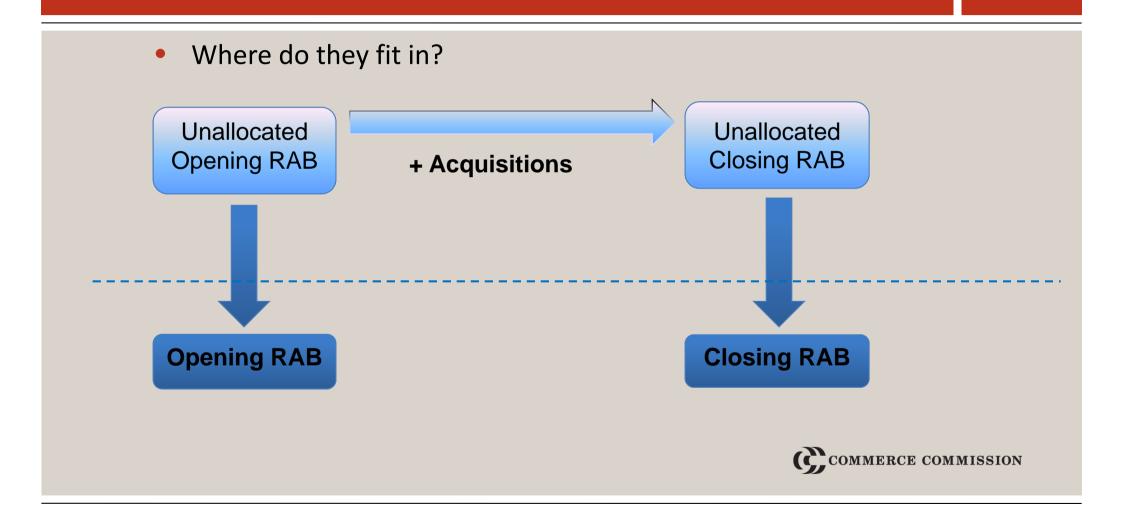
- CPP modifications to methodology
- Unallocated depreciation constraint over lifetime



Asset acquisitions and disposals

- More prescriptive than prior ID regime
- 'Commissioning': used by a supplier to provide services
- GAAP cost applies generally
 - 'location and condition'
 - foreign currency
 - cost of financing
- Relationship with tax cost covered in tax presentation
- Nil value for intangibles, easement land, unnecessary/expensed spares
- Limited values for easements, prior regulated assets, related party acquisitions

Asset acquisitions and disposals (cont)



Cost of financing

- Is limited to post-tax cost of capital
 - Prescribed for EDBs/GPBs (published WACC)
 - Estimated by exempt EDBs
- Start and stop dates
 - Consistent with NZ IAS 23 (Borrowing costs)



Related party acquisitions

- Principle: where the amount is material then must be at 'arm's length'
- Materiality: safe harbour where total of related party acquisitions are:
 - Less than 1% of opening RAB; or
 - Less than 20% of commissioned assets in that disclosure year
- Use actual purchase price if:
 - 50% or more related party sales; or
 - Substantially similar supplier in the last 3 years; or
 - Competitive tender; or
 - Certified by directors as at arm's length



Related party acquisitions (cont)

Otherwise:

- Depreciated historic cost; or
- Inventory value under GAAP; or
- Directly attributable cost for group transactions; or
- Market value determined by an independent valuer; or
- Nil (default option)



Other asset acquisition-related rules

- Subsequent work on an asset is capitalised as a separate asset
- Capital contributions
 - Reduces the cost of an asset
- Vested assets
 - Recorded at the value of the net cost of the regulated supplier
 - Most often nil value
- Revenue derived during construction reduces an asset's cost if:
 - Hasn't been reported as income under ID
 - Hasn't already reduced the asset's cost under GAAP

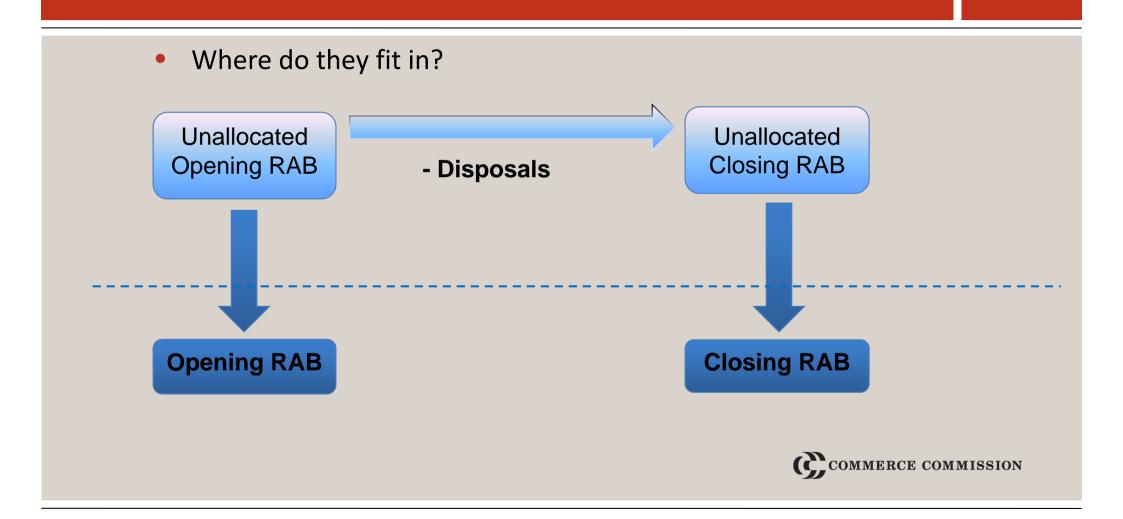


Asset disposals

- 'Sold or transferred'
- 'Irrevocably removed without consent'
- Exits the RAB at the opening RAB value



Asset disposals (cont)



Asset disposals (cont)

- What about:
 - Decommissioned assets
 - Redundant assets
 - Stranded assets
 - Value impairments required under GAAP
- Treatment of gain/loss on sale not in IMs

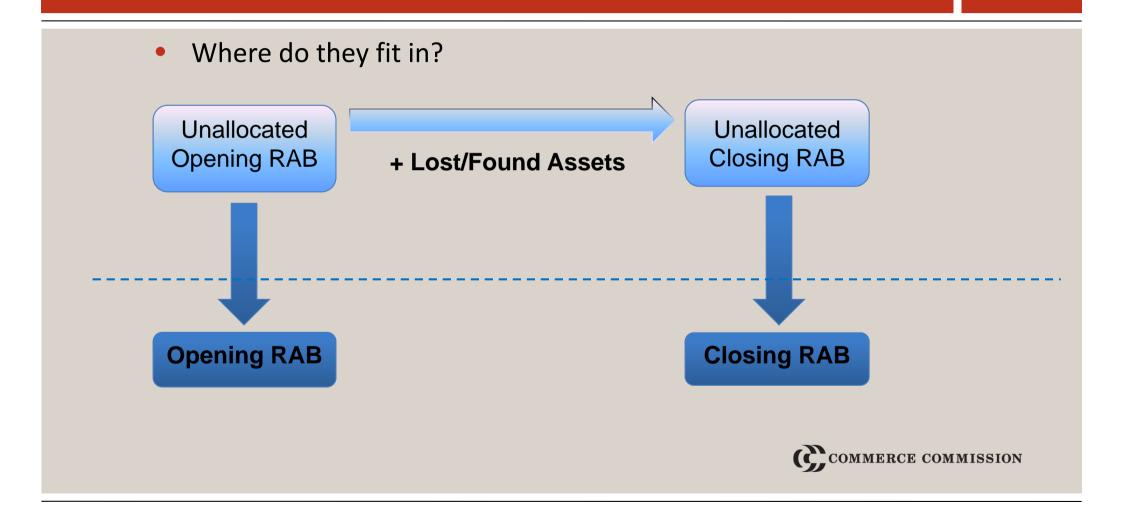


Special Cases

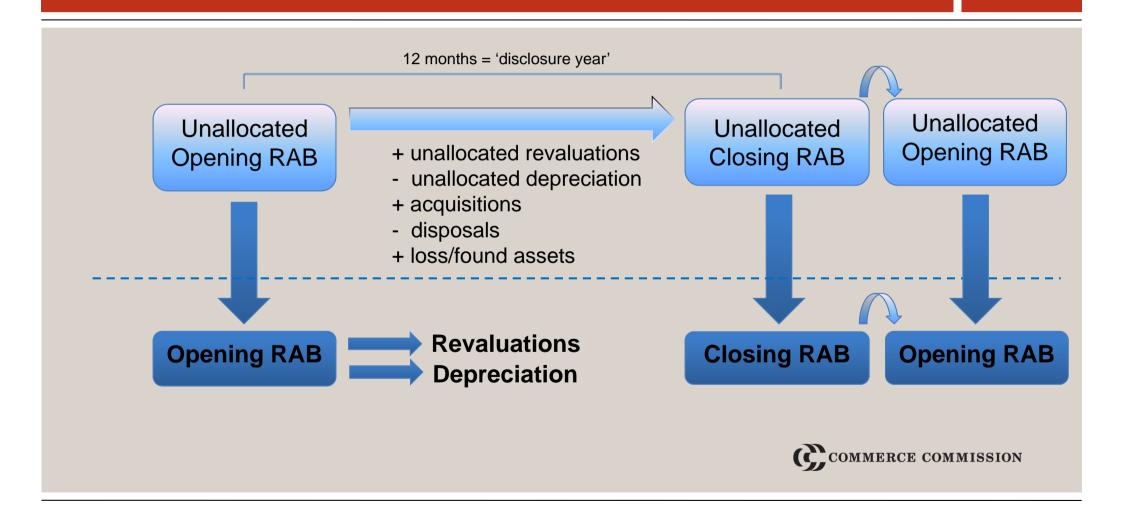
- Lost and found assets
 - Since 2009 only!
 - Should be relatively rare
- At what value do found assets enter the RAB?
 - GAAP value or find a similar asset
 - Market value otherwise
- Lost assets are treated as disposals for no consideration



Lost and found assets (cont)



Just to recap ...



Regulatory record keeping

- Flexibility in tracking regulatory values (vs GAAP or tax)
- Determined by own governance processes and assurance requirements
- Could adapt prior regulatory records
- Could make the case for a parallel system



Information Disclosure Seminar

These slides formed the basis of the seminar presented to suppliers and auditors by Commission staff in March 2013. They are intended to be used as general guidance only, and do not replace or summarise the information disclosure determinations themselves. In order to comply fully with the requirements of the determinations, suppliers and auditors should read the EDB, GDB and GTB determinations published on 1 October 2012. These documents can be found at:

- http://www.comcom.govt.nz/current-electricity-informationdisclosure-requirements/ for EDBs; and
- http://www.comcom.govt.nz/gas-information-disclosure/ for GPBs.



www.comcom.govt.nz

CONTACT

To contact the Commission with information about false or misleading trading practices, or anti-competitive behavior by businesses:

CALL the Contact Centre on 0800 943 600 WRITE to Contact Centre, PO Box 2351, Wellington EMAIL contact@comcom.govt.nz

