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Information Disclosure Requirements for Electricity Distribution Businesses and Gas Pipeline Businesses

Update Paper for Technical Consultation

Date: 6 July 2012

Regulation Branch
Commerce Commission
Wellington
NEW ZEALAND

Introduction

Purpose

1. The purpose of this paper is to invite:
 - 1.1 submissions on the technical drafting of the revised draft information disclosure determinations for electricity disclosure businesses (EDBs) and gas pipeline businesses (GPBs), and
 - 1.2 limited substantive submissions on specific topics (which are set out below).
2. The Commission has made no final decisions in relation to information disclosure for EDBs and GPBs. We may make further changes to the revised draft ID Determination in light of technical consultation and the Commission's further deliberations.

Background

3. On 16 January 2012 we released the following documents for consultation:
 - 3.1 Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012
 - 3.2 Draft Commerce Act (Gas Distribution Services Information Disclosure) Determination 2012
 - 3.3 Draft Commerce Act (Gas Transmission Services Information Disclosure) Determination 2012(referred to together as the draft ID Determinations), and
 - 3.4 Information Disclosure Requirements for Electricity Distribution Businesses and Gas Pipelines Businesses Draft Reasons Paper (draft reasons paper).
4. Submissions on the draft ID Determinations were due by 9 March 2012, and cross submissions were due by 23 March.

Structure of this document

5. This document discusses:
 - 5.1 submissions on our revised draft ID Determinations (page 2, below)
 - 5.2 the role of the Technical Reference Group (page 4)
 - 5.3 our revised draft decisions on information disclosure (page 5)
 - 5.4 structural and technical drafting changes (page 40).

Submissions on our revised draft ID Determinations

6. The revised draft ID Determinations reflect the changes we have made (including to the Schedules) as a result of our consideration of the submissions and cross-submissions we received.

Scope of submissions

Technical consultation

7. We are now consulting on the technical drafting of the revised draft ID Determinations. We are seeking submissions from interested persons on whether the revised draft ID Determinations give effect to our updated decisions.
8. If you consider that our updated draft decisions have not been accurately reflected in the revised draft ID Determinations, we ask that you include the drafting amendments you consider are necessary, with your submission. We have released Microsoft Word versions of the revised draft ID Determinations to enable you to directly mark up proposed drafting changes.
9. We will release Microsoft Excel versions of Schedules 1 to 13 in the week beginning 16 July.
10. With the exception of the topics noted in paragraph 11 below, this is not an opportunity for submissions on the substantive content and approach in the revised draft ID Determinations.

Topics for further substantive consultation

11. In addition to comments on technical drafting, we invite substantive submissions on the following specific topics:
 - 11.1 gas transmission pipeline capacity: in light of submissions on this topic and feedback from the Technical Reference Group (TRG), we have substantially revised our proposed information requirements in relation to gas transmission pipeline capacity. We discuss our proposed revisions on page 28 (item 30). These changes are reflected in the revised draft ID Determination for gas transmission businesses (GTBs) at clauses 2.5.2, 2.5.3, and 2.5.4
 - 11.2 definitions: while they are largely technical, definitions impact on the substance of the information disclosure requirements. We therefore invite submissions on the definitions in the revised draft ID Determinations. These are contained in:
 - 11.2.1 Clause 1.4.3 of the revised draft ID Determinations (this defines terms used in the main body of the revised draft ID Determinations, including the Appendices), and
 - 11.2.2 Schedule 16 (this defines terms used in the Schedules).
 - 11.3 transitional provisions for the application of revised expenditure categories: We have revised the expenditure categories that apply to EDBs and GPBs, as

discussed on page 13 (item 10). These expenditure categories apply to historic financial information contained in Schedules 2, 6 and 7 of the revised draft ID Determinations, as well as forecast information. If you consider that it is not possible to fully apply the revised expenditure categories to information for the 2013 disclosure year, please include the reasons for your view in your submission.

12. We ask that you include with your submissions on the topics listed in paragraph 11 any drafting amendments that you consider are necessary. If you consider that we need to provide definitions for any terms that are not already defined in clause 1.4.3 or Schedule 16, please provide proposed wording for the definition.

Next steps

13. Submissions should be received by the Commission no later than **5pm Friday, 3 August 2012**. We are providing a four week consultation period, longer than we previously indicated, to recognise that some regulated suppliers have also been required to respond to information gathering notices from the Commission over this period.

14. Submissions should be sent to:

regulation.branch@comcom.govt.nz

or

Anna McKinlay
Regulation Branch
Commerce Commission
P.O. Box 2351
Wellington

15. We will only allow extensions beyond the due date if a submitter provides good reasons in writing. Unless an extension has been granted, the Commission may not be in a position to adequately consider submissions that are received after the due date.
16. We will not be seeking cross-submissions in relation to submissions on technical drafting of the revised draft ID Determinations.
17. We will consider whether there is a need to provide for cross-submissions on specific topics identified in paragraph 11 once we have received submissions on these topics.

Timing of final decisions

18. We have not made any final decisions in relation to the information disclosure requirements.
19. We will confirm the timeframe for our final decisions once we receive submissions. Our final ID Determinations will be accompanied by a paper setting out the reasons for our final decisions.

Form of submissions and confidentiality

20. To foster an informed and transparent process, we will publish all submissions on our website.¹ Accordingly, we require that submitters provide us with an electronic copy of each submission. Electronic copies should be in an accessible form (i.e., they should be 'unlocked' such that text can be easily transferred). Submissions should not be provided as hard copies, unless an electronic copy is not available.
21. If the submission contains confidential information or if the submitter wishes that the published version be 'locked', an additional document labelled 'public version' should be provided.

Confidentiality

22. We discourage requests for non-disclosure of submissions, in whole or in part, as it is desirable to test all information in a fully public way. We are unlikely to agree to any requests that submissions in their entirety remain confidential. However, we recognise there will be cases where interested parties making submissions may wish to provide confidential information to us.
23. If it is necessary to include such material in a submission the information should be clearly marked and preferably included in an appendix to the submission. Interested parties should provide us with both confidential and public versions of their submissions in both electronic and hard-copy formats. The responsibility for ensuring that confidential information is not included in a public version of a submission rests entirely with the party making the submission.
24. Parties can also request that we make orders under s 100 of the Commerce Act 1986 in respect of information that should not be made public. Any request for a s 100 order must be made when the relevant information is supplied to us and must identify the reasons why the relevant information should not be made public. We will provide further information on s 100 orders on request, including the principles that are applied when considering requests for such orders. A key benefit of such orders is to enable confidential information to be shared with specified parties on a restricted basis for the purpose of making submissions. Any s 100 order will apply for a limited time only as specified in the order. Once an order expires, we will follow our usual process in response to any request for information under the Official Information Act 1982.

Role of the Technical Reference Group

25. A number of submissions raised concerns with the detailed information requirements we proposed in draft ID Determinations released in January. To assist us in considering submissions and cross-submissions, we reconvened the Technical Reference Group (TRG) on 30 April 2012 (for EDBs) and on 1 May (for GPBs) to provide technical feedback on proposed changes to the Schedules to the draft ID Determinations. The

¹ Our website is located at www.comcom.govt.nz.

feedback we received from the TRG has also informed the definitions for terms used in the Schedules.²

26. We provided information on the membership and purpose of the TRG in our recent Process Update Paper.³
27. The TRG's role was to provide practical and technical input on the workability of information requirements contained in the Schedules to the draft ID Determinations and to assist us to align the requirements with industry practices and standards, where possible.
28. In the discussion of our revised draft decisions below, we have indicated the specific areas where the TRG provided input.

Revised draft decisions on information disclosure

29. The tables on pages 6 to 39 set out our revised draft decisions on information disclosure for EDBs, GDBs, and GTBs.
30. In addition to the revisions we have made to the information requirements in the revised draft ID Determinations, we have made a number of revisions to the Schedules. We have made these revisions in response to submissions and with technical assistance from the TRG.

² Where these terms are also used in the main body of the revised draft ID Determinations, the definitions in clause 1.4.3 will reflect this input.

³ Commerce Commission, *Information Disclosure Requirements for Electricity Distribution Businesses and Gas Pipeline Businesses*, 23 May 2012, Attachment 1.

Analytical ratios

#	Issue / Matters raised by submitters	Sector	Commission's response	Ref.
1	A number of submitters supported the inclusion of performance measures in the information disclosure requirements. ⁴ ENA submitted that a number of performance measures included in the Electricity Distribution (Information Disclosure) Requirements 2008 (2008 IDRs) be reinstated as they provide a useful picture of performance. ⁵	All	We have added an additional schedule (Schedule 1) which sets out analytical ratios. These ratios are calculated from information provided in the other Schedules to the revised draft ID Determinations, so they will populate automatically (meaning that this Schedule does not impose any additional compliance costs).	Schedule 1

Financial information for the disclosure year: ROI, RAB value, and regulatory profit

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
2	<i>Related party transactions: Definition of 'open tender' and use of open tender prices</i> Orion submitted that the term 'open tender' is ill-defined. ⁶	All	We have replaced the term 'open tender' with the term 'certified tender', which can now include closed tenders, and provided various qualification criteria. These criteria bar the use of a tender price where special contract terms (as defined) have been	2.3.6(2)(f), 2.3.8

⁴ Including ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraphs 66-69, 81-82, 235-237, 246-248); PWC, *Submission to the Commerce Commission on Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012 made on behalf of 22 Electricity Distribution Businesses*, 9 March 2012 (paragraphs 60-64); Gasnet, *Submission on Information Disclosure Requirements for Gas Pipelines Businesses - Draft Determination*, 9 March 2012 (paragraph 19); and Horizon Energy, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (paragraphs 21 and 25).

⁵ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 240)

⁶ Orion, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 61)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
	<p>Orion and Powernet raised concerns about the applicability of requirements for open tender price disclosures to the variety of operational arrangements that reflect local situations. They also noted that suppliers have a desire to achieve cost minimisation where possible and to encourage learning and innovation as well as achieving economies of scale. According to Orion, operating a 'full' contracting market with multiple tenders received for every project, even in a market the size of Canterbury, is complex (and therefore costly) and there may be strategic reasons why a tender is sought from only one contractor.⁷</p> <p>ENA submitted that it is not reasonable to impose a lowest qualifying tender test, as a higher quality/higher cost tender is a reasonable outcome in a competitive market.⁸ This was supported by NERA who stated that it is not obvious that a tender should always be 'open' and always be awarded to the lowest bidder.⁹</p>		<p>negotiated in the post-tender process.</p> <p>The Commission accepts that there may be local situations where the lowest cost tender may not produce the best service outcome. We have therefore included a 5% variance threshold, so that the transaction price of the winning tender may be used for disclosure where (amongst other criteria) it is no greater than 105% of the lowest cost tender.¹⁰</p>	

⁷ Orion, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 49); Powernet, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (paragraph 5.5 – 5.6)

⁸ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 121)

⁹ NERA, *Treatment of Related Party Transactions - A report for the ENA*, 9 March 2012

¹⁰ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 121)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
3	<p><i>Related party transactions: Additional valuation options</i></p> <p>NERA suggested that the Commission consider whether to add to its value criteria that an EDB should be permitted to include the full value of a related party transaction in its information disclosures where the costs are not greater than those that would have been incurred in undertaking those activities in-house, and where no other contractor was offering a service of a comparable quality at a lower cost.¹¹</p> <p>We had previously proposed an option under which related party transactions could be disclosed at the transaction value, where the related party makes at least 75% of its sales to unrelated parties, at demonstrably the same prices. Some submitters recommended reducing the threshold to 50%. Submitters suggested that 75% was a high threshold to meet, and could require an undue amount of the related party's transactions to be with other parties. In some circumstances this would be impossible.¹²</p>		<p>We have provided for additional valuation options:</p> <ul style="list-style-type: none"> • the full value of a related party transaction to be included where directors certify that the price is equivalent to that which could be expected in an arms-length transaction, subject to the price not being able to be determined under other options • the directly attributable costs of assets or services as would be incurred by the group to which the EDB and the related party are a part • valuation of material asset components at GAAP inventory value. <p>To make this a more viable option for suppliers, we have lowered the threshold in clause 2.3.1(2)(c)(i) to 50%.</p> <p>We have also amended 2.3.6(1)(g) in light of revisions to relevant provisions of the input methodologies for EDBs and GPBs.¹³</p>	<p>EDBs/GDBs: 2.3.6, 2.3.7, 2.3.8</p> <p>GTBs: 2.3.7, 2.3.8, 2.3.9</p>

¹¹ NERA, *Treatment of Related Party Transactions - A report for the ENA*, 9 March 2012

¹² For example, Orion, *Submission on Electricity and Gas Input Methodology Determination Amendments 2012*, 1 June 2012, page 3; Aurora, *Submission to the Commerce Commission on its Draft Amendments to Decisions 710 under s52X of the Commerce Act 1986*, 1 June 2012, page 3.

¹³ Commerce Commission, *Electricity and Gas Input Methodology Determination Amendments (No. 1) 2012*, Decision No. [2012] NZCC 18, 29 June 2012.

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
4	<p><i>Related party transactions: Definition of costs and margins</i></p> <p>ENA submitted that the terms 'cost' and 'cost directly incurred' are not defined and from their knowledge of related party arrangements, different providers recover a different set of costs above and below the gross margin line.¹⁴ This was also commented on by NERA and Orion. NERA observes that costs such as return on and of capital, allowance for recovery of common costs, business sustainability costs such as payments for training and development of staff, cost of self-insurance against asymmetric contract risks, and margins arising from economies of scale, scope or other synergies unavailable to the EDB are all potentially legitimate costs that a contractor could expect to recover in a workably competitive market.¹⁵</p>	All	<p>We accept that there may be a variety of interpretations of cost. We have inserted additional clauses specifying that 'cost' includes only costs permitted under the IM determinations, and in particular subpart 1 of part 2 (cost allocation)..¹⁶</p> <p>We have also defined the term 'mark-up' in the revised draft ID Determinations.</p>	<p>1.4.3; EDBs/GDBs: 2.3.10, 2.3.11; GTBs: 2.3.11, 2.3.12</p>

¹⁴ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 121)

¹⁵ NERA, *Treatment of Related Party Transactions - A report for the ENA*, 9 March 2012 (Paragraph 3.2); Orion, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012

¹⁶ *Commerce Act (Electricity Distribution Services Input Methodologies) Determination 2010, Commerce Act (Gas Distribution Services Input Methodologies) Determination 2010, Commerce Act (Gas Transmission Services Input Methodologies) Determination 2010*, available from the Commission's website.

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
5	<p><i>Related party transactions: Supplier sales to related party</i></p> <p>MGUG¹⁷ submitted that the Commission has overlooked a supplier providing a service to (as opposed to receiving a service from) a related entity.</p>	All	We have included provisions for related party sales in the revised draft ID Determinations. These provisions generally mirror those provisions for purchase of goods and services from related parties.	EDBs, GPBs: 2.3.9; GTBs: 2.3.10
6	<p><i>Related party transactions: Special situation of MDL</i></p> <p>Maui Development Limited (MDL) submitted that controls on related party transactions are already included in the Maui Pipeline Operating Code and include ring-fencing, rules about arm's length operations.¹⁸ MDL submits these are adequate controls and provide comfort for its customers. MDL does not object to ID with regard to non-routine transactions with related parties and would be willing to report on such transactions. MDL urges the Commission to limit the scope of related party transactions requiring separate disclosure to non-routine transactions only. Routine transactions in relation to MDL would be gas transmission shipments, balancing gas transactions and transactions for purchasing/selling gas that was initiated on an exchange/trading platform for anonymous trading. These transactions are the reason</p>	MDL only	The revised draft ID Determination for GTBs limits MDL's disclosures of related party transaction to non-routine transactions only.	GTBs: 2.3.7

¹⁷ MGUG, Information Disclosure Requirements for Electricity Distribution Businesses and Gas Pipeline Businesses Draft Reasons Paper dated 16 January 2012, and Draft Commerce Act (Gas Transmission Services Information Disclosure) Determination 2012, 9 March 2012

¹⁸ Maui, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
	the Maui pipeline was created in the first place. If all of these disclosures are required to be disclosed at nil MDL will have nil revenues.			
7	<p data-bbox="259 427 544 456"><i>Return on investment</i></p> <p data-bbox="259 483 992 730">There was strong support in submissions for retaining the existing ROI formula. ENA submitted that the IRR formula is complicated, not readily understood by interested persons and not typically used as an annual profit measure. The standard ROI measure better meets the purpose of ID and is more easily understood.¹⁹</p> <p data-bbox="259 791 992 898">MEUG submitted that interested persons may wish to compare ROI calculated using the standard approach as well as using proposed alternative.²⁰</p>	All	<p data-bbox="1167 427 1850 534">We are retaining the revised ROI formula as the primary measure of returns, as it is a more accurate measure than the existing ROI calculation.</p> <p data-bbox="1167 579 1850 762">However, taking account of submissions, we have also reinstated the existing ROI formula. This will provide a quick reference indicator for interested persons and a reasonableness check on the correct calculation of the new formula.</p> <p data-bbox="1167 807 1850 991">In addition, we have decided to require suppliers to use the alternative ROI calculation based on monthly cash flows, where asset expenditure during the year is lumpy, in order to more accurately capture the timing of cash flows.</p>	2.3.3

¹⁹ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 19)

²⁰ MEUG, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (paragraph 4)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
8	<p><i>Term Credit Spread Differential Allowance</i></p> <p>Vector and Powerco submitted that the underlying detail of this calculation, in particular the coupon rates, is commercially sensitive.²¹ Vector notes that the disclosure of the coupon rates is superfluous to the calculation.²²</p>	All	We have removed the requirement to publicly disclose coupon rates, the name of the issuer (we have included an option to disclose alternative identifying information) and non-qualifying debt.	Schedule 3a
9	<p><i>Application of regulatory tax disclosure to MDL</i></p> <p>MDL submitted that, as it is not a tax paying entity, it should be able to apply a notional tax rate and be exempt from having to complete the tax permanent differences and temporary differences sections of Schedule 3, as it has no ability to compel its joint venture parties to provide the relevant information.²³</p>	MDL only	<p>We agree that a notional tax allowance calculation using the statutory tax rate is appropriate for MDL's circumstances and have amended the ID requirements to reflect this.</p> <p>MDL will still be required to complete the tax permanent differences and temporary differences sections of the regulatory tax allowance schedule as the likely compliance costs are low and the information is required to determine the notional tax costs.</p>	GTBs: 2.3.4

²¹ Vector, *Submission to the Commerce Commission on the IDRs for Electricity Distribution Businesses and Gas Pipeline Businesses*, 9 March 2012 (paragraph 104 to 121); Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (paragraph 9)

²² Vector, *Submission to the Commerce Commission on the IDRs for Electricity Distribution Businesses and Gas Pipeline Businesses*, 9 March 2012 (paragraph 110)

²³ Maui, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (paragraphs 4 to 12)

Financial information for the disclosure year: Expenditure by category

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
10	<p><i>Level of disaggregation and consistency with the relevant Input Methodologies for a Customised Price-Quality Path (CPP IM)</i>²⁴</p> <p>Submitters raised concerns that the expenditure categories used in information disclosure should be consistent with the CPP IM. For example, ENA did not support the capex and opex categories proposed in the draft ID Determination. ENA is concerned that the expenditure categories:</p> <ul style="list-style-type: none"> • introduce inconsistency with the CPP IM; • further disjoint the historical time series of opex and capex data; and • add compliance costs. <p>ENA suggested a better approach is to retain for EDBs the categories in the 2008 disclosure requirements,²⁵ and base the definitions on the CPP IM, which can be</p>		<p>We have reviewed the expenditure categories in light of submissions and sought input from the TRG on them. We have identified a number of technical refinements to the categories and sub-categories:</p> <ul style="list-style-type: none"> • We have reduced the level of disaggregation. The revised draft ID Determinations require expenditure by sub-category only for the largest categories of expenditure. Less substantial categories need only be further disaggregated on an 'exceptions' basis by material project or programme) • We have refined the categories to provide greater consistency with the CPP IM. The expenditure categories in the revised draft ID Determinations either match directly, or can be easily aggregated to match, to an equivalent category in the CPP IM. <p>The revised draft ID Determinations include the</p>	Schedules 2, 6, 7, 11a, 11b, section 2.12

²⁴ Commerce Commission "Input Methodologies (Gas Distribution Services Information Disclosure) Determination" (22 December 2010), Part 5
 Commerce Commission "Input Methodologies (Gas Transmission Services Information Disclosure) Determination" (22 December 2010), Part 5
 Commerce Commission "Input Methodologies (Electricity Distribution Services Information Disclosure) Determination" (22 December 2010), Part 5.

²⁵ Commerce Commission, "Electricity Distribution (Information Disclosure) Requirements 2008" (31 October 2008), Schedule 1.

	strengthened to improve compliance and aid understanding. ²⁶		<p>following:</p> <ul style="list-style-type: none"> • for the 2012 disclosure year EDBs can disclose using information categorised using the expenditure categories defined in the Electricity Distribution (Information Disclosure) Requirements, 2008. • GPBs are not required to disclose disaggregated expenditure data for the 2012 disclosure year • EDBs and GPBs will first be required to apply the revised expenditure categories for the 2013 disclosure year. <p>If any submitter considers that it is not possible to apply the revised expenditure categories to information for the 2013 disclosure year, please indicate in your submission why this is the case.</p>	
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²⁶ ENA, Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper, 9 March 2012 (paragraph 22)

11	<p><i>Treatment of renewals</i></p> <p>ENA notes that the draft reasons paper appears to make judgements regarding renewals expenditure which is contrary to GAAP. GAAP does permit some components of refurbishment and renewals to be expensed.²⁷</p>		<p>The revised draft ID Determination includes a category of operational expenditure for expenditure on asset replacement or renewals .</p>	<p>Schedules 2, 6, 7, 11a, 11b</p>
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Pricing and related information

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
12	<p><i>Pricing principles and guidelines</i></p> <p>Submitters generally argued for incorporation of the EA's pricing principles by way of reference (rather than direct incorporation) (ENA, Aurora, Powerco, Vector, Orion).²⁸ Submitters note that this will enable any changes to the EA's principles to be incorporated into the Commission's requirements; and recognises that the EA is the lead regulator on pricing methodology issues.</p>	EDBs	<p>The revised draft ID Determination incorporates the EA's pricing principles by reference.</p>	<p>1.4.3 (definition of pricing principles)</p>

²⁷ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 138)

²⁸ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 163); Aurora Energy, *Submission to the Commerce Commission on its Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012 and Companion Draft Reasons Paper - Information Disclosure Requirements for Electricity Distribution Businesses and Gas Pipeline Businesses*, 9 March 2012 (paragraph 29-33); Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (paragraph 14); Vector, *Submission to the Commerce Commission on the IDRs for Electricity Distribution Businesses and Gas Pipeline Businesses*, 9 March 2012 (paragraph 91-97); Orion, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 33)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
13	<p><i>Pricing strategies</i></p> <p>ENA submitted that the pricing strategy requirement should relate only to written strategies approved by the Board. This was supported by Powerco and Vector.²⁹</p>	All	The revised draft ID Determination requires disclosure of pricing strategies that are in the form of a decision made at Board level and recorded in writing.	1.4.3 (definition of pricing strategy)
14	<p><i>Proportion of prices (by consumer group and type of tariff)</i></p> <p>The draft ID Determinations required disclosure of the proportion of prices for each consumer group (fixed, variable, or demand- based), and the reasons for determining the proportions of prices in this way. ENA submitted that the requirement should be simplified to require the method and rationale for determining unit prices consistent with requirement 23e in the 2008 IDRs.³⁰</p> <p>Clause 3.7 requires disclosure of the allocation of the components of target revenue between consumer groups. ENA noted that components may not have</p>	All	<p>The revised draft ID Determinations require suppliers to disclose the proportion of target revenue (if applicable) that is collected through each type of tariff as publicly disclosed annually under clause 16. It also now requires disclosure of how aggregate target revenue is allocated to consumer groups.</p> <p>Disclosure in respect of the above is on an 'as applicable' basis (to reflect that suppliers may not actually allocate revenue or ultimately set prices using target revenue in this way).</p>	2.4.3(7) and (8).

²⁹ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 172); Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (paragraph 28); Vector, *Submission to the Commerce Commission on the IDRs for Electricity Distribution Businesses and Gas Pipeline Businesses*, 9 March 2012 (paragraph 31-2)

³⁰ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (final items in table page 86)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
	<p>been allocated to consumer groups in this fashion, as the pricing principles may alter these allocations. ENA recommends that this clause should only refer to aggregate target revenue as the volatility in quantities year in year will generally be less at aggregate target revenue level.³¹</p>			
15	<p><i>Changes in target revenue</i></p> <p>ENA and Powerco submitted that the requirement to disclose reasons for changes in target revenue between disclosure years (in terms of the two constituent variables, price and quantity) will confuse interested persons, as price changes are already explainable by the derivations of tariffs contained in pricing methodology disclosures consistent with the EA Guidelines, and the relationship to Notional Revenue requires analysing the price and volume components.³²</p> <p>Powerco queried whether this clause refers to target revenue estimated for collection, rather than revenue collected during the prior disclosure year.³³</p>	All	<p>We have removed the requirement to disclose the previous disclosure year's target revenue and to compare that with the target revenue disclosed in the current disclosure year.</p> <p>The revised draft ID Determinations require suppliers, as part of their annual disclosures following the end of the disclosure year to compare actual revenues disclosed for the disclosure year with the target revenue (if applicable) disclosed in the pricing methodology disclosure (which is made before the start of the disclosure year).</p>	Schedules 2, 14

³¹ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraphs 166-70 and 1st item page 87)

³² ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraphs 168); Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (2nd table item, page 28)

³³ Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (2nd table item, page 28)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
16	<p><i>Financial distributions ('discretionary discounts')</i></p> <p>ENA submitted that discretionary discounts are an ownership matter and that the approach in the draft ID Determinations is inconsistent with the definition of regulatory revenue.³⁴ PwC submitted that discretionary discounts are not relevant to the disclosure of prices as they are an ownership issue that should not be confused with other EDB pricing decisions. PwC notes that discretionary discounts are usually approved by owner representatives (e.g. the trust etc.) so the methodology used to calculate them is not relevant to pricing. PwC considers that the decomposition of gross line charge revenue into net line charge revenue and discretionary discounts is not consistent with the manner in which revenue has been defined in the input methodologies.³⁵</p>	EDBs	The revised draft ID Determination requires disclosure of the methodology an EDB uses to allocate discretionary discounts, only where the EDB recommends how the discounts should be allocated, or allocates them on behalf of its owners.	EDBs: 2.4.21, 2.4.22
17	<p><i>Capital contributions: Disclosure by consumer group</i></p> <p>Submitters (Powerco, ENA) expressed concern at requirements to disclose capital contributions by consumer group.³⁶ Submitters indicated that suppliers</p>	EDBs and GDBs	<p>We liaised with the TRG on this matter.</p> <p>We have removed the requirement to disclose capital contributions by consumer group in the Schedules. We</p>	Schedule 6 2.4.6

³⁴ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (final table item page 89)

³⁵ PricewaterhouseCoopers, *Submission to the Commerce Commission on Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012 made on behalf of 22 Electricity Distribution Businesses*, 9 March 2012 (paragraph 173-75)

³⁶ Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (item 1 on page 35); ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 185)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
	<p>generally do not capture capital contribution charges in this manner. In addition, capital contribution charges are often paid by other parties (such as property developers). GasNet noted that it does not require capital contributions as it does not have a relationship with end consumers.³⁷</p> <p>ENA also noted that the capital contributions requirement could be made more generic by removing the word 'consumer' from Clause 7.³⁸</p>		<p>have allowed for disclosure of total capital contributions in Schedule 6 (Report on Capital Expenditure for the Disclosure Year) instead.</p> <p>We acknowledge that capital contributions can be paid by parties other than consumers. Accordingly we have adopted ENA's suggested change and deleted the word 'consumer' from the relevant clause.</p>	
18	<p><i>Capital contributions: Disclosure on request of a detailed explanation of capital contribution charge</i></p> <p>Powerco submitted that the capital contribution process is managed by the electrical contractors. It is preferable that the end consumer continues to contact the electrical contractor in the first instance.³⁹ GasNet noted that it does not have a contractual relationship with the customer and deals instead with the energy retailer concerned.⁴⁰</p>	All	<p>We have amended clause 2.4.7 to only apply where the regulated supplier seeks a capital contribution.</p> <p>We consider that this issue potentially applies to GTBs as well. We have therefore amended the revised draft ID Determination for GTBs.</p>	2.4.7

³⁷ Gasnet, *Submission on Information Disclosure Requirements for Gas Pipelines Businesses - Draft Determination*, 9 March 2012 (paragraph 48)

³⁸ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (page 88)

³⁹ Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (page 11, re: clause 8)

⁴⁰ Gasnet, *Submission on Information Disclosure Requirements for Gas Pipelines Businesses - Draft Determination*, 9 March 2012 (paragraph 58)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
19	<p><i>Non-standard contracts: prices, terms and conditions</i></p> <p>A number of submitters expressed concerns regarding the confidential nature of prices, terms and conditions of non-standard contracts. (Powerco, PWC)⁴¹ Powerco submitted that its gas network is subject to a risk of bypass by Nova Gas and that the public disclosure of terms and conditions upon request would provide commercially sensitive information to the marketplace, putting Powerco at an unacceptable competitive disadvantage.⁴²</p> <p>PwC submitted that the requirement to disclose non-standard contract prescribed terms one month after signing or at the request of any person does not show regard to consumer confidentiality. The provision of ANZSIC codes under clause 14.3 means competitors in similar industries will know when a competitor is building or expanding at a site, potentially even before construction begins.⁴³</p> <p>MGUG and Meridian supported the proposed disclosure requirements.⁴⁴</p>	All	<p>We have amended in the revised draft ID Determinations as follows:</p> <ul style="list-style-type: none"> • suppliers now have the option to publicly disclose limited terms of non-standard contracts, or to publicly disclose the full set of prescribed terms and conditions, within 5 months of the end of the disclosure year; • suppliers must disclose the full set of prescribed terms and conditions within 20 working days if requested to, but only for those contracts where limited terms and conditions have already been publicly disclosed; • where suppliers have disclosed the full set of prescribed terms and conditions on request, they must also publicly disclose the full set of prescribed terms and conditions; • suppliers are no longer required to disclose ANZSIC codes; and • suppliers are no longer required to disclose the price of non-standard contracts. 	2.4.10, 2.4.11

⁴¹ Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 (Paragraph 16, see also table in Part 2 of submissions – items 11 and 12); PricewaterhouseCoopers, *Submission to the Commerce Commission on Draft*

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
20	<p><i>Definition of consumer</i></p> <p>Vector (submitted (in reference to gas transmission in particular) that clause 16 is simply not meaningful or possible as, apart from direct connect customers, gas transmission charges are not set on an end-consumer basis.⁴⁵</p>	All	We have revised the definition of 'consumer' in the revised draft ID Determinations.	1.4.3
21	<p><i>Disclosure of capacity by consumer group</i></p> <p>ENA submitted that the requirement to disclose the capacity of each consumer group is potentially inconsistent with how consumer groups are defined.⁴⁶</p>	EDBs and GDBs	We have deleted the words 'including the capacity of the consumer group' from clause 2.4.16(1)(a) in the revised draft ID Determinations.	2.4.16

Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012 made on behalf of 22 Electricity Distribution Businesses, 9 March 2012 (paragraphs 159-164)

⁴² Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses, 9 March 2012 (paragraph 29)*

⁴³ PricewaterhouseCoopers, *Submission to the Commerce Commission on Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012 made on behalf of 22 Electricity Distribution Businesses, 9 March 2012 (paragraph 163)*

⁴⁴ MGUG, *Information Disclosure Requirements for Electricity Distribution Businesses and Gas Pipeline Businesses Draft Reasons Paper dated 16 January 2012, and Draft Commerce Act (Gas Transmission Services Information Disclosure) Determination 2012, 9 March 2012 (page 14); Meridian, Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses, 9 March 2012 (page 1)*

⁴⁵ Vector, *Submission to the Commerce Commission on the IDRs for Electricity Distribution Businesses and Gas Pipeline Businesses, 9 March 2012 (paragraph 126)*

⁴⁶ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper, 9 March 2012 (2nd table item on page 89);*

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
22	<p><i>Form of notice of price changes to standard consumers</i></p> <p>Many submitters including Unison, The Lines Company, PwC, ENA and GasNet submitted that the requirement to give written notice to standard consumers of price changes in addition to newspaper disclosure is impractical, costly and is either not meaningful to consumers or would cause confusion given the interposed relationship of consumers with retailers.⁴⁷ Submissions recommend that this requirement should be replaced with an option to disclose either in writing directly to consumers or via newspaper. PWC also suggested that suppliers should have the option to disclose in other forms of mass media that are more relevant to their consumers (e.g. online news or social media).</p>	All	<p>We have amended clause 2.4.17 to give the suppliers the option to either:</p> <ul style="list-style-type: none"> • disclose directly in writing to consumers; or • notify consumers through publication in newspapers or online news media widely read by consumers connected to the lines/pipelines of the supplier. 	2.4.17

⁴⁷ Unison, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses and Gas Pipeline Businesses – Draft Reasons Paper*, 9 March 2012 (paragraph 39); The Lines Company, *Submission to the Commerce Commission on the Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012*, 9 March 2012 (page 7); PricewaterhouseCoopers, *Submission to the Commerce Commission on Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012 made on behalf of 22 Electricity Distribution Businesses*, 9 March 2012 (paragraphs 167-8); ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (5th table item on page 89); Gasnet, *Submission on Information Disclosure Requirements for Gas Pipelines Businesses - Draft Determination*, 9 March 2012 (paragraph 56)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
23	<p><i>Schedules: Information on quantities and revenues billed</i></p> <p>Schedule 13 of the draft ID Determinations required disclosure of disaggregated information on 'pricing statistics'. Submitters expressed concerns with the workability of this schedule, for example:</p> <ul style="list-style-type: none"> • submitters and TRG attendees questioned the need for information about aggregate non-coincident maximum demands and contracted maximum demands and the ability to compile certain information (such as capital contributions) by consumer group • for some suppliers, revenue information is not available by consumer group (e.g. GasNet);⁴⁸ • the use of terminology such as 'consumer group code' that did not reflect actual practice (e.g. GasNet's view, expressed at the Technical Reference Group, that they did not use consumer group codes). 	EDBs and GDBs	<p>We sought feedback on the old Schedule 13 from the TRG. We have revised the relevant Schedule as follows:</p> <ul style="list-style-type: none"> • the Schedule focuses on billed quantities and revenues (now disclosed in separate groups for standard and non-standard consumers), by the price categories and/or codes applicable to them • the requirement to disclose capital contributions by consumer group has been removed from the Schedule (see topic #17). Disclosures are only required to refer to total capital contributions in Schedule 6 (Report on Capital Expenditure for the Disclosure Year) • information on consumer groups or types is required only if known. 	Schedules 8a, 8b

⁴⁸ GasNet, *Submission on Information Disclosure Requirements for Gas Pipelines Businesses - Draft Determination*, 9 March 2012 (page 14)

Non-financial information for the disclosure year: Network asset information

#	Matters raised by submitters	Sector	Commission's response	Cl. Ref.
24	<p><i>Level of detail of information on network assets and associated network drivers</i></p> <p>Some submitters raised concerns about the level of detail of information on network assets proposed in the draft ID Determinations. These concerns related in particular to the Network Driver AMP Report and Network Asset AMP Report (in the Schedules 15 and 16 of our draft ID Determinations, respectively).⁴⁹</p> <p>Submitters raised similar concerns in relation to performance information, which we discuss in rows 25 and 26 below.</p>	All	<p>We have worked through the detailed information requirements in the Schedules relating to network assets (including information on the asset register, asset condition, capacity, and demand) with the TRG and made a number of refinements to the Schedule.</p> <p>We have also restructured the Schedules, including dividing the requirements for information on network assets into a larger number of more focussed tables. Schedules 9a to 9e and 12a ask for the same type of information as previously provided for in Schedules 15(1), 16(1), 16(2), but presented in a simplified format.</p>	Schedule 9a, 9b, 9c, 9d, 9e, 12a

⁴⁹ For example ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012, paragraphs 252–254, 258; PricewaterhouseCoopers, *Submission to the Commerce Commission on Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012 made on behalf of 22 Electricity Distribution Businesses*, 9 March 2012, paragraphs 60–64; Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012 paragraphs 19–21; Orion *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 paragraphs 15–16; Gasnet, *Submission on Information Disclosure Requirements for Gas Pipelines Businesses - Draft Determination*, 9 March 2012 paragraph 19; Horizon Energy, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012, paragraphs 21, 25.

Non-financial information for the disclosure year: Reliability

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
25	<p><i>Adjust SAIDI and SAIFI for the impact of extreme events.</i></p> <p>Submitters commented that network reliability performance assessments are often influenced by the impact of extreme events. ENA suggests that the Commission normalise SAIDI and SAIFI for the impact of extreme events (using the method used for the DPP). ENA noted this will require no additional work for non-exempt EDBs, and some additional work for exempt EDBs who will need to derive their boundary values. The datasets they require to do this have already been prepared and audited as part of the previous thresholds regime.⁵⁰</p>	EDBs	<p>We have amended the draft ID Determinations so that class B and C interruptions are reported both before and after the adjustment for maximum event days.</p>	Schedule 10
26	<p><i>Categorise faults by a standard set of causes</i></p> <p>ENA submitted that a materially better approach to understanding faults on the network would be to require EDBs to categorise faults by a standard set of causes and allocate the annual SAIDI by cause, disclosing total annual SAIDI by cause.⁵¹</p>	EDBs	<p>Based on our discussions with the TRG, we have included a summary table that allocates SAIDI and SAIFI:</p> <ul style="list-style-type: none"> • by cause (vegetation, adverse weather, defective equipment etc.), and • by main equipment involved (Subtransmission Underground Cables, Subtransmission Overhead 	Schedule 10

⁵⁰ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 273)

⁵¹ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraphs 274–275)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
			Lines, Distribution Overhead Lines etc.)	
27	<p><i>Disclosure of individual faults</i></p> <p>Submitters were concerned about the level of disaggregation of data on customer interruptions.⁵² Submitters' view was that full schedule of EDB network faults should not be disclosed. ENA believe that this approach does not fulfil the requirements of ID because it does not deliver an assessment of network performance which can be readily used by interested parties.</p>	EDBs	<p>Based on our discussions with the TRG, we have revised the Schedules to capture the following information for each interruption on the network:</p> <ul style="list-style-type: none"> • date and time • customers interrupted • duration • the resulting contribution to SAIDI and SAIFI. 	Schedule 10, 10a
28	<p><i>Fault per circuit km statistics</i></p> <p>In its submission ENA noted that the proposed network performance report is largely based on the existing MP3 schedule, but excludes the fault per circuit km statistics. ENA believed that the fault per circuit km statistics should be reinstated.⁵³</p>	EDBs	The revised draft ID Determination includes a calculation of fault rates per circuit kilometre in Schedule 1.	Schedule 1

⁵² For example ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraph 69).

⁵³ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012 (paragraphs 239–240, 266, 270, 276).

Gas capacity information

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
29	<p><i>GDB pipeline capacity disclosures</i></p> <p>Powerco (and cross-submission p.3) submitted that further consideration of the 'pipeline peak off take report' for GDBs is warranted.⁵⁴ This is because:</p> <ul style="list-style-type: none"> • disclosures on distribution capacity will be adequately covered in other parts of the Gas AMP • it is not the most effective manner in which to measure or analyse distribution capacity • it requires Powerco to obtain information from retailers, but does not provide a mechanism to require retailers to collect or supply the information, and • the system peak hour (and offtake peak day) as determined by this methodology may not be the same as the absolute peak hour. This could lead to misinterpretation of forecast demand. <p>GasNet does not support the inclusion of this disclosure requirement for GDBs.⁵⁵</p>	GDBs only	<p>We have developed an alternative approach, with input from the TRG, and have amended the draft ID Determination for GDBs to:</p> <ul style="list-style-type: none"> • remove the requirement for GDBs to provide a pipeline peak off take report (previously provided for in Appendix B) • expand the disclosure requirements on pipeline capacity and utilisation in the AMP and the AMP/AMP update schedules to include pressure, capacity and utilisation information on pipelines that are forecast to be heavily utilised over the next five years. 	App. A, cl. 4

⁵⁴ Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012, page 34.

⁵⁵ Gasnet, *Submission on Information Disclosure Requirements for Gas Pipelines Businesses - Draft Determination*, 9 March 2012, page 26.

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
30	<p><i>Disclosure of Transmission Pipeline Capacity</i></p> <p>Vector discussed the interrelationship of capacity and AMP disclosures, and submitted that the matter of whether planned investment is adequate to meet consumer needs falls under the umbrella of asset management.⁵⁶ Vector also submitted that disclosure of capacity information in November is appropriate, regardless of when the disclosure year ends, as the winter of that calendar year will have (just) passed so disclosed peak period data should be recent. (Vector cross-submission.⁵⁷</p> <p>Vector also stated in its cross-submission that daily and hourly gas receipt and delivery quantities are available on the Open Access Transmission Information System (OATIS),⁵⁸ and that Vector has no problem, in principle, with this information being made available via OATIS to other parties (subject to a reasonable fee).⁵⁹</p> <p>Maui Development Limited (MDL) submitted that that the approach to the pipeline capacity question taken in</p>	GTBs only	<p>We invite substantive submissions on this topic, as discussed in paragraphs 11 and 12 of this paper.</p> <p><i>Content and form of disclosures</i></p> <p>We have discussed Vector and MDL's concerns with the TRG and with the Gas Industry Company. We have also further considered Vector's suggestion of providing transmission flow information on OATIS. We are also aware that MDL provides some transmission flow information publicly on OATIS and its balancing gas exchange website BGX.⁶¹</p> <p>The revised draft ID Determinations:</p> <ul style="list-style-type: none"> • do not include previous Appendix B (Disclosure of Pipeline Capacity) the draft ID Determination for GTBs • retain the requirement for GTBs to make peak flow information available, at a minimum, for each 	2.5.2, 2.5.3, 2.5.4, App. A, cl. 10

⁵⁶ Vector, *Submission to the Commerce Commission on the IDRs for Electricity Distribution Businesses and Gas Pipeline Businesses*, 9 March 2012 (paragraphs 138, 141-145)

⁵⁷ Vector, *Cross-Submission to the Commerce Commission on the IDRs for Electricity Distribution Businesses and Gas Pipeline Businesses*, 23 March 2012 (paragraphs 57-58)

⁵⁸ www.oatis.co.nz.

⁵⁹ Vector, *Cross-Submission to the Commerce Commission on the IDRs for Electricity Distribution Businesses and Gas Pipeline Businesses*, 23 March 2012 (paragraphs 63-65)

⁶¹ www.bgx.co.nz.

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
	<p>Appendix B is likely to result in generation of data that has little practical use as far as the Maui pipeline is concerned whereas the relevant data is already published and easily accessible. A better outcome would result from a less prescriptive approach that requires pipeline owners themselves to identify the critical points on their transmission systems, the extra capacity available at them and the appropriate measures to overcome any constraints, if necessary.⁶⁰</p>		<p>September year</p> <ul style="list-style-type: none"> • amend the peak flow disclosure requirement such that, if the GTB regularly discloses the peak flow information for each offtake point on the internet, then it is not required to make annual public disclosures of this information. <p><i>Timing of disclosures</i></p> <p>The revised draft ID determination require disclosures for GTBs as follows:</p> <ul style="list-style-type: none"> • peak flow information (revised requirements) annually in November. This allows a month after the end of the September flow year. • capacity allocation methodologies and capacity reservation information (revised requirements) within 6 months after the end of the disclosure year • a transmission system capacity assessment, including the analysis of available capacity at each offtake point, in the AMPs and AMP updates (or in the transitional AMP, if a transitional AMP is prepared). The GTB may publish the analysis of available capacity before 	

⁶⁰ Maui Development Limited, Cross-submission on draft ID determinations, page 2.

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
			disclosing the AMP and make reference to this publication in the AMP.	

AMPs and other forecast information

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
31	<p><i>Asset Management Plan Templates</i></p> <p>Many industry submissions, including one from PwC, proposed that information for those tables in the Schedules of the ID Determinations that are directly relevant to the forecast period be directly incorporated into the AMP / AMP update documents. PwC suggested that the completed Schedule templates can then be disclosed within five months of the disclosure year end, along with the other completed schedule templates.⁶²</p>	All	<p>In the revised draft ID Determinations we have amended the AMP requirements to:</p> <ul style="list-style-type: none"> • move the tables that required historic information to be disclosed at the same time the AMP is disclosed from the AMP templates into the Network Asset Information Schedules (Schedules 9a to 9e). As a consequence, this information will first be disclosed within 5 months of the end of the disclosure year for EDBs, and 6 months for GDBs and GTBs. • require that suppliers embed the completed AMP schedules into the AMP/AMP update/transitional AMP documents. Suppliers must provide the completed AMP templates to the Commission in Excel form together with a copy of the AMPs/AMP updates/transitional AMPs within 5 working days of 	App. A, Schedule 9a, 9b, 9c, 9d, 9e, 10a, 10b, 11a, 11b, 12a, 12b, 12c, 12d

⁶² PricewaterhouseCoopers, *Submission to the Commerce Commission on Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012 made on behalf of 22 Electricity Distribution Businesses*, 9 March 2012, page 39.

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
			<p>publicly disclosing the AMP/AMP update/transitional AMP</p> <ul style="list-style-type: none"> require suppliers to also publicly disclose the completed AMP schedule templates (for EDBs, 5 months after the AMP is disclosed, for GPBs 6 months after the AMP is disclosed), as part of the full annual disclosure pack. 	
32	<p><i>AMMAT disclosures</i></p> <p>ENA submitted that the proposed AMMAT disclosures replicate some of the new material which is included in AMPs. ENA noted this was not the intent of the Commission's advisors (PB), who recommended the AMP disclosure requirements remain unchanged and the AMMAT disclosures be specified to address areas not included in the AMP requirements.⁶³</p> <p>ENA, Marlborough Lines, Orion, Powerco, PWC, Vector, and Wellington Electricity recommended that the AMMAT disclosures not be required to be disclosed with the AMP updates because of the effort involved in completing the self-assessments and the AMP Update is limited to the forecast development and maintenance plans, which exclude other associated</p>	All	<p>We have made the following revisions to the draft ID Determinations:</p> <ul style="list-style-type: none"> suppliers must disclose the AMMAT as part of the full AMP suppliers are not required to disclose the AMMAT with the AMP updates. This is because the AMP update requirements do not focus asset management processes and systems and so will not provide insufficient context for interested persons to interpret the AMMAT Report between AMP disclosures, suppliers must disclose in the AMP update any change in asset management practices that would affect the AMMAT. 	App. A, Schedule 13

⁶³ ENA, Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper, 9 March 2012 (paragraphs 208-210 and 220)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
	<p>asset management processes, which are the primary concern of AMMAT.⁶⁴</p> <p>Vector and PwC also recommended that the Commission remove overlaps between the AMP and AMMAT disclosure requirements.</p>			
33	<p><i>Non-system asset and operational expenditure</i></p> <p>The draft AMP requirements did not include a discussion of the expenditures on non-system assets and operational costs disclosed in the draft AMP forecasting templates.</p>	All	We have amended the AMP requirements so that the AMP must include a discussion of expenditure on non-network operational expenditure and non-system assets (renamed non-network assets).	App. A

⁶⁴ ENA, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012, page 53.

Audit and certification requirements

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
34	Several parties submitted that the draft ID Determinations should not require audit assurance reports to include a duty of care to the Commission. ⁶⁵	All	<p>We have liaised with the Office of the Auditor General the New Zealand Institute of Accountants and the External Reporting Board. In the revised draft ID Determinations:</p> <ul style="list-style-type: none"> • the assurance report must be prepared in accordance with Standard on Assurance Engagements SAE 3100 – Compliance Engagements and International; Standard on Assurance Engagements (NZ) 3000 or their successor standards • consistent with SAE 3100 and ISAE (NZ) 3000, the assurance report must be addressed to the directors of the relevant supplier and to the Commission as the 'intended users' of the report • the assurance report is not required to state that a duty of care is owed to the Commission • we specify the review procedures that the Commission expects an auditor to undertaken in the assurance engagement. 	Section 2.8

⁶⁵ Including Electricity Networks Association, *Submission on Information Disclosure Requirements for Electricity Distribution Businesses: Draft Determination and Draft Reasons Paper*, 9 March 2012, paragraph 279; PWC, *Submission to the Commerce Commission on Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012*, paragraph 218; Powerco, *Submission on Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012 & Draft Commerce Act (Gas Distribution Services Information Disclosure) Determination*, pages 13 and 31; Wellington Electricity Lines Limited, *Information Disclosure Requirements (IDR)—Draft Reasons Paper*, section 7, page 13; Office of the Auditor General, *Comments on Draft Commerce Act (Electricity Distribution Services Information Disclosure) Determination 2012*, 13 March 2012.

Timing of disclosure requirements

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
35	<p><i>Disclosure years for GPBs</i></p> <p>GasNet, Vector, and MDL opposed a regulatory disclosure year that is different to their financial year.⁶⁶ These three companies reiterated their objections to a different disclosure year in submissions on our separate consultation on changes to Input Methodologies.⁶⁷ However, Powerco expressed a preference to shift to an October to September disclosure year.⁶⁸</p>	GPBs	<p>We have amended the definition of 'disclosure year' in the revised draft ID Determinations for GDBs and GTBs as follows:</p> <ul style="list-style-type: none"> • the disclosure year for Powerco will be a 12 month period ending in September • the disclosure year for Vector and GasNet will be a 12 month period ending in June • the disclosure year for MDL will be a 12 month period ending in December. 	1.4.3, definition of 'disclosure year'
36	<p><i>Timing of AMPs</i></p> <p>Suppliers were generally in agreement with the proposal to reduce the frequency of disclosure of a full AMP to no less than every two years. WELL observed</p>	All	The revised draft ID Determinations amend the frequency of AMP disclosures to synchronise the AMP disclosures with the regulatory period applicable under default price-quality regulation (the DPP regulatory period). Suppliers must publicly	2.6.3

⁶⁶ Gasnet, *Submission on Information Disclosure Requirements for Gas Pipelines Businesses - Draft Determination*, 9 March 2012, paragraph 29; Maui Development Limited, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses*, 9 March 2012, pages 11-12, paragraphs 50-54; Vector, *Submission to the Commerce Commission on the IDRs for Electricity Distribution Businesses and Gas Pipeline Businesses*, 9 March 2012, page 13, paragraph 47.

⁶⁷ See Commerce Commission, *Consultation on Electricity and Gas Input Methodology Determination Amendments 2012*, 11 May 2012; GasNet, *Submission on Proposed Amendments to Input Methodologies*, 30 May 2012, paragraphs 4 to 10; MDL, letter to Karen Murray, submitting on proposed amendments to Input Methodologies, 1 June 2012; Vector, *Consultation on Electricity and Gas Input Methodology Determination Amendments 2012*, 1 June 2012, paragraphs 15 to 25.

⁶⁸ Powerco, *Submission on Input Methodology Determination Amendments*, 29 May 2012, paragraphs 18 to 19.

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
	<p>that some of the costs of additional disclosure may be managed by disclosing a full AMP on a biennial basis.⁶⁹</p> <p>Some submitters, e.g. ENA, submitted that in general it supports the proposed modifications to the contents of the AMPs, but that the AMP should have 'status in the regulatory regime beyond disclosure' and therefore a role in regulatory assessments decision making including DPP and CPP decisions, as it contains important qualitative information.⁷⁰</p> <p>Vector submitted that the requirements should be staggered to allow gas and electricity to disclose AMPs on alternate years to each other (this is a practical matter, as the same Vector staff prepare AMPs for both the electricity distribution and gas pipelines sides of the business).⁷¹</p>		disclose an AMP no less than twice in the DPP regulatory period, with full AMPs publicly disclosed prior to years 1 and 4 of the DPP regulatory period.	

⁶⁹ Wellington Electricity Lines Ltd, *Information Disclosure Requirements (IDRs) Draft Reasons Paper* 9 March 2012, page 8.

⁷⁰ ENA, *Submission to the Commerce Commission on Draft Commerce Act (Electricity Distribution Determination 2012*, 9 March 2012, page 11.

⁷¹ Vector Limited, *Submission to the Commerce Commission on the IDRs for EDBs and GPBs*, 9 March 2012, page 35.

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
37	<p><i>Timing of annual disclosures for GPBs</i></p> <p>Powerco submitted that the deadline for annual disclosure of pricing information should be 6 months (not 5 months) after the end of the disclosure year as this would allow GPBs to incorporate the results of wash-up calculations for the full disclosure year in their disclosed information.⁷²</p>	GPBs	The revised draft ID Determinations require GPBs to disclose historic information to 6 months after the end of the disclosure year (not 5 months).	<p>2.3.1, 2.3.2, 2.5.1 GDBs: 2.4.19, 2.4.20</p> <p>GTBs: 2.4.18</p>
38	<p><i>Explanatory commentary on the impact of wash-ups on disclosed information</i></p> <p>Powerco's submission in item 37, above, raises a general point about the impact of final volume wash-ups on previously disclosed information. Volume wash-ups are a feature of both the electricity distribution and gas pipeline sectors. Should final wash-ups impact materially on information that has already been disclosed for a past disclosure year it is desirable that suppliers have the ability to acknowledge this through their annual disclosures.</p>	All	We have provided an option for suppliers to comment in explanatory notes to their annual disclosures on any changes to past year information arising from final wash-ups.	Schedule 14

⁷² Powerco, *Submission to the Commerce Commission on the Draft Information Disclosure Determination and Draft Reasons Paper for Electricity Distribution Businesses* 9 March 2012, page 30.

Commencement and transitional exemptions

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
39	<p><i>Timing of initial disclosures: historic information relating to the disclosure year ending in 2012</i></p> <p>We now plan to finalise the ID Determinations in August 2012. The timeframes for suppliers to prepare their initial disclosures provided for in our draft ID Determinations are no longer appropriate.</p>	All	<p>The revised draft ID Determinations require suppliers to disclose historic information for the 2012 disclosure year as follows:</p> <ul style="list-style-type: none"> • EDBs must disclose by 31 December 2012, for the 12 months ending 31 March 2012 • Vector and GasNet must disclose by 30 April 2013, for the 12 months ending 30 June 2012 • Powerco must disclose by 30 April 2013, for the 12 months ending September 2012 • MDL must disclose by June 2013 for the 12 months ending in December 2012 (as a consequence of our decision in item 37 above regarding the timing of annual disclosures). 	2.12.1
40	<p><i>Timing of initial AMP disclosures for GPBs</i></p> <p>The draft ID Determinations required GPBs to disclose their first AMPs before the start of the 2012 to 2013 disclosure year. This is no longer practical, in light of our revised timetable for final decisions, together with our revised decision on disclosure years for GPBs (see item 35 above).</p>	GPBs	<p>GPBs will not be required to disclose their first AMPs before the commencement of the 2014 disclosure year, that is by:</p> <ul style="list-style-type: none"> • 30 June 2013 for Vector and GasNet • 30 September 2013 for Powerco • 31 December 2013 for MDL. 	

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
41	<p><i>Form of transitional AMPs for GasNet and MDL</i></p> <p>GasNet submitted that it has not previously formalised its asset management practices in an AMP document.⁷³ GasNet also observed that EDBs have worked with the Ministry of Economic Development and the Commission for 13 years in developing their AMPs to the level of conformity currently required for a full AMP.⁷⁴ GasNet proposed a reduced set of AMP requirements for GPBs as a transitional measure.⁷⁵</p>	GasNet and MDL only	<p>The revised draft ID Determinations for allow GasNet and MDL to provide a transitional form of AMP during the first 5 year DPP regulatory period, or until such time that their AMP conforms to the full requirements.</p> <p>The transitional AMP must be disclosed annually and must:</p> <ul style="list-style-type: none"> • meet a set of minimum requirements • incorporate each of the forecasting templates • include the analysis (or reference to the analysis) of available capacity • identify where the company considers the plan does not yet conform to the full requirements, and • set out the actions the GPB is taking to ensure it will conform before the end of the regulatory period. 	GDBs, GTBs: 2.12.6

⁷³ Gasnet, Submission on Information Disclosure Requirements for Gas Pipelines Businesses - Draft Determination, 9 March 2012 (paragraph 63)

⁷⁴ Gasnet, Submission on Information Disclosure Requirements for Gas Pipelines Businesses - Draft Determination, 9 March 2012 (paragraph 66)

⁷⁵ Gasnet, Submission on Information Disclosure Requirements for Gas Pipelines Businesses - Draft Determination, 9 March 2012 (paragraph 83-86)

#	Issue / Matters raised by submitters	Sector	Commission's response	Cl. Ref.
42	<p data-bbox="259 272 712 308"><i>Continuity of information for GPBs</i></p> <p data-bbox="259 347 981 496">The draft ID Determinations included an additional disclosure for MDL to cover the 9 month gap in information that would have arisen from the transition to an October-September disclosure year.</p> <p data-bbox="259 536 992 799">We have decided that MDL will continue to disclose information based on a January to December year. MDL has already made disclosures under the GIDRs for the year ended 31 December 2011, and its first disclosure under the ID Determination will cover the period beginning 1 January 2012. Accordingly there is now no information gap.</p>	MDL	We have removed the requirement for MDL to provide a limited transitional disclosure from the draft determination for GTBs.	Section 2.12
43	<p data-bbox="259 845 949 880"><i>Commencement of ongoing pricing disclosures: GPBs</i></p> <p data-bbox="259 920 943 1024">Existing disclosure requirements for GPBs and EDBs cover prices and prescribed terms and conditions of standard contracts.⁷⁶</p> <p data-bbox="259 1064 965 1168">However, the specific meaning of 'publicly disclose' in our draft ID Determinations differs from current requirements under the GIDRs.⁷⁷</p>	GDBs and GTBs	The revised draft ID Determinations for GDBs and GTBs allow up to 2 months from the date of the ID Determinations for GPBs to comply with the meaning of 'publicly disclose', for requirements to disclose prices and prescribed terms and conditions of standard contracts.	Section 2.12

⁷⁶ Requirements for GPBs are found in the Gas (Information Disclosure) Regulations 1997, in clauses 24-27 (line charges) and 8-14 (prescribed agreements), respectively. For EDBs these requirements are found in Part 6 clauses 25-28 (line charges) of the 2004 requirements (consolidating all amendment to 31 October 2008), and clause 5 of the 2008 requirements.

⁷⁷ The definition of 'publicly disclose' in the GIDRs requires GPBs to make this information available for inspection and on request, only.

Structural and technical drafting changes

31. We have reviewed and refined the structure of the draft ID Determinations, and the Schedules to the draft ID Determinations.

Changes to the structure of the draft ID Determinations

32. We have made a number of editorial changes to the draft ID Determinations, including:
 - 32.1 re-ordering the sub-clauses in clause 2.3.1(1) to reflect the order of information in the revised Schedules
 - 32.2 moving the requirement to annually disclose the Report Supporting Asset Allocation and the Report Supporting Cost allocation so that it follows immediately after clause 2.3.1
 - 32.3 inserting a new section 2.5 'Non-financial Information for the Disclosure Year: Network Assets and Reliability', and moving the provisions previously set out in clauses 6 and 7 of Part 2.5, to the new section 2.5
 - 32.4 inserting a new section 2.7 'Explanatory notes to information relating to the disclosure year', as a consequence of introducing separate Schedules for explanatory notes
 - 32.5 updating the Schedule references in the revised draft ID Determinations to reflect the revised numbering of the Schedules (see below).

Changes to the structure of the Schedules

33. We have reordered the Schedules to ensure that information on the same high level topic is grouped together. This grouping is reflected in the revised numbering and the revised Schedule names. As part of this reordering and grouping we have also split some Schedules. For example we have separated the report on expenditure (previously Schedule 6) into two reports: a report on capital expenditure for the disclosure year, and a report on operating expenditure (new Schedules 6 and 7).
34. To assist auditors undertaking assurance reviews of the disclosures, we have clearly distinguished between financial information relating to the disclosure year; non-financial information relating to the disclosure year; and forecast information.
35. We have included an additional Schedule of analytical ratios.
36. To assist with calculating opening regulatory tax balances and the regulatory tax allowance in accordance with the IM determination we have revised Schedule 4d (4c for GTBs) and carried out some reformatting of Schedule 5a.
37. We have incorporated explanatory notes for each of the Schedules into separate Schedules (and associated Word templates).

38. We have added a short introductory statement at the top of each Schedule. This summarises the type of information sought in the Schedule.
39. The table below lists the revised Schedule names and numbers and the corresponding Schedules from the draft ID Determinations released on 16 January 2012.

Revised Schedule structure

New schedule name and number		Equivalent schedule from Draft Determinations	
EDBs	GDBs and GTBs	EDBs	GDBs and GTBs
Analysis tables			
1: Analytical ratios (automatically calculated)		Not applicable (new table)	
2: Comparison of actual and forecast expenditure		S7: Report on expenditure forecasts	
Information on ROI, RAB value, and regulatory profit for the disclosure year			
3: Report on Return on Investment		S1: Report on Return on Investment	
3a: Report on Term Credit Spread Differential Allowance		S4: Report on term credit spread differential allowance	
4: Report on value of the regulatory asset base (rolled forward)		S5: Report on regulatory asset base roll forward	
4a: Report on asset allocations		S9: Report on asset allocations	
4b: Report supporting asset allocations		S11: Report supporting asset allocations	
4c: Report on initial RAB adjustment		S20: Asset adjustment process	not applicable
4d: Report on transitional financial information		S21: Report on transitional financial information	S20: Report on transitional financial information
5: Report on regulatory profit		S2: Report on regulatory profit	
5a: Report on regulatory tax allowance		S3: Report on regulatory tax allowance	
5b: Report on related party transactions		S8: Report on related party transactions	
5c: Report on cost allocations		S10: Report on cost allocations	
5d: Report supporting cost allocations		S12: Report supporting cost allocations	
Information on expenditure for the disclosure year			
6: Report on capital expenditure for the disclosure year		S6: Report on Expenditure	
7: Report on operational expenditure for the disclosure year		S6: Report on Expenditure	
Information on quantities and revenue for the disclosure year			
8a: Report on billed quantities and line charge revenues (by type of charge)		S13: Report on pricing statistics	
8b: Report on billed quantities and line charge revenues (by customer type)		S13: Report on pricing statistics	

New schedule name and number			Equivalent schedule from Draft Determinations	
EDBs		GDBs and GTBs	EDBs	GDBs and GTBs
Network asset data				
9a: Asset register			S16 Network asset AMP report(1), (2), (3)	
9b: Asset age profile			S16 Network asset AMP report (1), (2), (3)	
9c: Report on overhead lines		9c: Report on pipeline data	S16 Network asset AMP report (1), (2), (3)	
9d Embedded networks			S16 Network asset AMP report (1), (2), (3)	
9e Report on demand		9d: Report on demand	S16 Network asset AMP report (1), (2), (3)	
Information on reliability for the disclosure year				
10: Report on network reliability		10: Report on network reliability and interruptions	S19: Network performance report	
10a: Report on network reliability (data class C)		10a: Report on network integrity and customer service	S19: Network performance report	
AMP forecasts				
EDBs		GDBs	GTBs	
11a: Capex forecast			S14: Network expenditure AMP report	
11b: Opex forecast			S14: Network expenditure AMP report	
12a: Asset condition			S18: Network driver report	
12b: Capacity forecast		12b: Forecast utilisation	n/a	S18: Network driver report
12c Demand forecast		12c Demand forecast	12b Demand forecast	
12d: Reliability forecast			S15: Network driver AMP report	
13: AMMAT			S17: AMMAT	
Notes to the tables				
14: Mandatory explanatory notes			Replaces notes boxes previously embedded in other Schedules	
14a: Mandatory explanatory notes on forecast information				
14b: Explanatory notes on transitional financial information				
15 Voluntary explanatory notes				
Defined terms				
16: Definitions of terms used in the Schedules			Not applicable (new)	
Certification templates				
17: Certification for Year-beginning Disclosures			Schedules 22,23, and 24	Schedules 21, 22, and 23
18: Certification for Year-end Disclosures				
19: Certification for Transitional Disclosures				

Changes to definitions

40. We have made a number of changes to the definitions in the revised draft ID Determinations, including:
 - 40.1 changing a number of existing definitions
 - 40.2 inserted new definitions where appropriate to reflect changes in the revised draft ID Determinations and Schedules
 - 40.3 deleted some definitions based on submitters' feedback, and where the definitions are no longer necessary due to other drafting changes
 - 40.4 provided definitions for a number of terms used in the Schedules that were not previously defined.
41. In the revised draft ID Determinations, we have separated the definitions that are used in the Schedules from those used in the revised draft ID Determinations and Appendices:
 - 41.1 terms used in the revised draft ID Determinations and Appendices are defined in clause 1.4.3 of the revised draft ID Determinations
 - 41.2 terms used in the Schedules are defined in Schedule 16.
42. As discussed in paragraphs 11 and 12, we invite substantive comment from submitters on the definitions contained in the revised draft ID Determinations.

Technical drafting changes

43. We have also made a number of drafting changes that we consider to be technical in nature, including corrections to typographical and grammatical errors. Given the extent of changes we have made in response to submissions we have not provided marked-up versions of the revised draft ID Determinations.