

Access Arrangement Information for
Proposed Revisions
DBNGP Access Arrangement

2016 – 2020 Access Arrangement Period

Access Arrangement Information



Economic Regulation Authority

WESTERN AUSTRALIA

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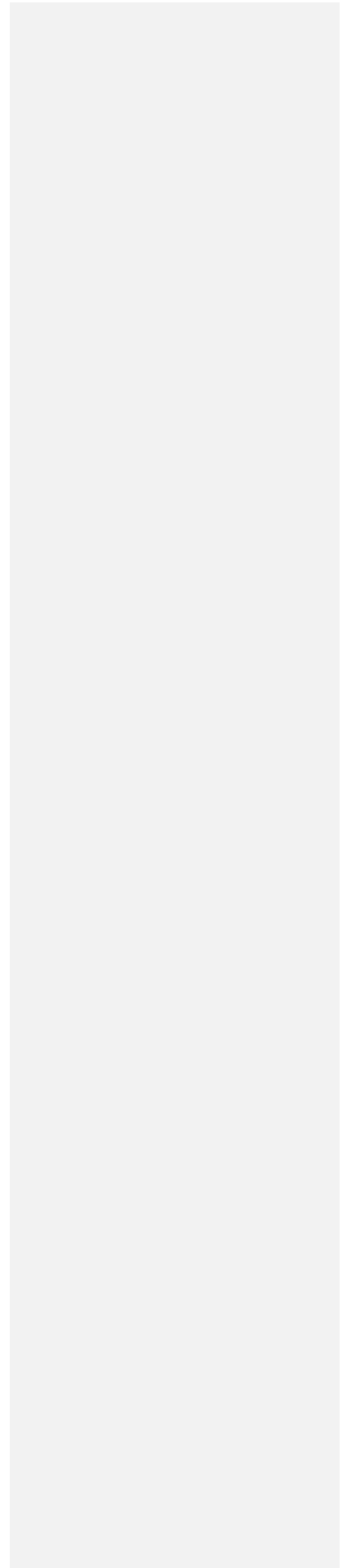
DBP Transmission (DBP) is the owner and operator of the Dampier to Bunbury Natural Gas Pipeline (DBNGP), Western Australia's most important piece of energy infrastructure.

~~Amended by DBNGP (WA) Transmission Pty Ltd~~



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18 October 2012



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The DBNGP is WA's key gas transmission pipeline stretching almost 1600 kilometres and linking the gas fields located in the Carnarvon Basin off the Pilbara coast with population centres and industry in the south-west of the State

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Access Arrangement Information

Introduction (section 1)

1. INTRODUCTION

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1. INTRODUCTION

1.1 This document comprises the Access Arrangement Information (AAI) for the ~~revised~~Current Access Arrangement for the Dampier to Bunbury Natural Gas Pipeline ~~proposed and pursuant to the requirements of the National Gas Access (WA) Act 2009 (NGA), the National Gas Access (Western Australia) Law (NGL) and National Gas Rules 2009 (NGR).~~

~~1.1.2~~The AAI revises the access arrangement information for covered pipeline services on the DBNGP that was given effect from ~~4 January~~18 October 2012 by the Economic Regulation Authority (the Authority~~ERA~~) pursuant to ~~rule~~NGR 64 of the ~~National Gas Rules 2009 (NGR).~~~~(Prior Access Arrangement Information).~~

~~1.3~~ ~~Basis on which financial~~The AAI was submitted to the ERA in accordance with NGR 43.

1.4 In accordance with NGR 42, this AAI contains the information that is necessary for Shippers and Prospective Shippers:

- (a) to understand the background to the access arrangement proposal; and
- (b) to understand the basis and derivation of the various elements of the access arrangement proposal.

1.5 The AAI relates to the Current Access Arrangement Period.

1.6 Table 1 outlines the provisions of the NGR and NGL that outline what must be included in an AAI (NGR Requirements) and where NGR Requirements are addressed.

Table 1: Requirements of the Access Arrangement Information

NGR	Requirement	AAI Section
r. 72(1)(a)(i)	Capital expenditure (by asset class) over the earlier access arrangement period.	0
r.72(1)(a)(ii)	Operating expenditure (by category) over the earlier access arrangement period.	4
r.72(1)(a)(iii) (A) / (B)	Usage of the pipeline over the earlier access arrangement period showing for a transmission pipeline including minimum, maximum and average demand for each receipt or delivery point and user numbers for each receipt or delivery point.	5
r. 72(1)(b)	How the capital base is arrived at and, if the access arrangement period commences at the end of an earlier access arrangement period, a demonstration of how the capital base increased or diminished over the previous access arrangement period.	0
r. 72(1)(c)(i)	The projected capital base over the access arrangement period, including a forecast of conforming capital expenditure for the period and the basis for the forecast.	0
r. 72(1)(c)(ii)	A forecast of depreciation for the period including a demonstration of how the forecast is derived on the basis of the proposed depreciation method.	0
r. 72(1)(d)	To the extent it is practicable to forecast pipeline capacity and utilisation of pipeline capacity over the access arrangement period, a forecast of pipeline capacity and utilisation of pipeline capacity over that period and the basis on which the forecast has been derived.	10
r. 72(1)(e)	Forecast of operating expenditure over the access arrangement period and the basis on which the forecast has been derived.	11
r. 72(1)(f)	The key performance indicators to be used by the service provider to support expenditure to be incurred over the access arrangement period;	12
r. 72(1)(g)	The proposed return on equity, return on debt and allowed rate of return, for each regulatory year of the access arrangement period, in accordance with rule 87, including any departure from the methodologies set out in the rate of return guidelines and the reasons for that departure.	13



NGB	Requirement	AAI Section
r.72(1)(ga)	The proposed formula (if any) that is to be applied in accordance with rule 87(12).	14
r. 72(1)(h)	The estimated cost of corporate income tax calculated in accordance with rule 87A, including the proposed value of imputation credits referred to in that rule.	14
r. 72(1)(i)	If an incentive mechanism operated for the previous access arrangement period—the proposed carry-over of increments for efficiency gains or decrements for efficiency losses in the previous access arrangement period and a demonstration of how allowance is to be made for any such increments or decrements.	N/A
r. 72(1)(j)(i)	The suggested basis of reference tariffs, including the method used to allocate costs and a demonstration of the relationship between costs and tariffs.	15
r. 72(1)(j)(ii)	A description of any pricing principles employed but not otherwise disclosed under this rule.	15
r. 72(1)(k)	the service provider's rationale for any proposed reference tariff variation mechanism.	0
r. 72(1)(l)	The service provider's rationale for any proposed incentive mechanism.	N/A
r. 72(1)(m)	The total revenue to be derived from pipeline services for each regulatory year of the access arrangement period.	0



2. BASIS ON WHICH FINANCIAL INFORMATION IS PROVIDED (SECTION 2)

2. BASIS ON WHICH FINANCIAL INFORMATION IS PROVIDED

2.1 2.1. Financial information is provided on a calendar year basis.

2.2 2.2. Unless otherwise stated, financial information is stated in this AAI is provided on a calendar year basis and in real terms with values expressed at dollar values of on a 31 December 2010-2015¹ basis.

2.2.3 2.2. Where necessary to express financial values in dollar values of 31 December 2010-2015, the financial values have been escalated at the rate of inflation as measured by the Consumer Price Index (All Groups, Weighted Average of Eight Capital Cities) as published by the Australian Bureau of Statistics (CPI), shown in Table 2, or de-escalated at a forecast the expected rate of inflation, shown in Table 2. Actual and forecast values of the CPI and year on year percentage changes are as shown in Table 4 provided below.

Table 2 Actual (2005 to 2010) and forecast (2011 to 2015) December values of the Consumer Price Index (All groups, Weighted Average of Eight Capital Cities) and implied inflation rates.

: Rate of inflation 2011-15

Y	2	2	2	2	2	2	2	2	20	20	20	20	20
									11	12	13	14	15
CPI	150.6	155.5	160.1	166.0	169.5	174.0	178.8	183.7	188.8	193.9	199.3		
In	2.80	3.25	2.96	3.69	2.11	2.65	2.75	2.75	05	02	2.75	2.75	
	%	%	%	%	%	%	%	%*	%*	%*	%	%	

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Capital expenditure over the 2005 to 2010 access arrangement period (section 3)

3. CAPITAL EXPENDITURE OVER THE PRIOR ACCESS ARRANGEMENT PERIOD

3.1. Conforming Capital Expenditure (by asset class) made during the Prior Access Arrangement Period is shown in Table 2.

Table 2 Conforming capital expenditure for the 2005 to 2010 access arrangement period (real \$ million at 31 December 2010)

Source: 2011 - 2013 Australian Bureau of Statistics

*Determined on the same basis as 'expected inflation' in paragraph 2.4 below - to be updated for actual when available.

¹ It should be noted that the figures are stated in this AAI in \$2015 using the rate of inflation provided above.



Expected rate of inflation

2.4 Expected inflation shown in Table 3 has been determined using the linear interpolation and Fischer equation approach outlined in the ERA's Rate of Return Guidelines and based on the 40 trading days prior to 30 September 2014².

Table 3: Expected rate of inflation 2016-20

Year 2016	2006-2017	2006-2018	2007-2019	2008-2020	2009	2010	Total	
Pipeline		8.589	257.230	1.246	517.327	-	489.960	1,274.351
Compression		47.620	171.988	0.148	132.939	-	52.261	404.956
Metering		-	-	-	-	0.078	4.756	4.834
Other depreciable	2.04%	4.0672.09%	0.8792.16%	2.33622%	5.9052.30%		71.22	
Other non-depreciable		-	-0.134	1.950	1.484	0.679	0.666	4.645
Total		60.277	429.962	5.680	657.654	-1.316	618.866	1,773.755

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² It should be noted that the reference in this paragraph to "30 September 2014" will be changed to a date closer to the date of the Final Decision made by the ERA (once that decision is made) and the figures in Table 3 will be updated to reflect this.



3. OPERATING CONFORMING CAPITAL EXPENDITURE OVER THE 2005 TO 2010 ACCESS ARRANGEMENT PERIOD (SECTION 4) 2011-15

4. OPERATING EXPENDITURE OVER THE PRIOR ACCESS ARRANGEMENT PERIOD

3.1 4. For the purposes of NGR 72(1)(a)(i), Conforming Capital Expenditure for (by asset class) made over the Prior Access Arrangement Period is shown in Table 3-Table 4.

Table 4 Operating: Conforming capital expenditure for the 2005 to 2010 access arrangement period (real \$ million 2011-15 (Real \$m at 31 December 2010) 2015)

Year	2011 08	2009 2012	2013 07	2014 03	2015 03	2	Total
Expansion	-	-	-	-	-	-	-
Pipeline	36.45	10.79	0.00	0.00			0.00
Compression	27.46	3.74	0.00	0.00			0.00
Metering	0.00	0.00	0.00	0.00			0.00
Other	19.93	-1.81	0.00	0.00			0.00
Costs other than fuel gas non-depreciable	43.248 0.00	44.2270.00	46.3970 .00	59.4550 .00	82.1890 .00	55.158	330.674
BEP Lease	21.26	0.00	0.00	0.00			0.00
Sub total	105.09	12.73	0.00	0.00			0.00
Stay-in-business	-	-	-	-	-	-	-
Pipeline	13.97	4.83	4.88	0.61			4.30
Compression	5.59	5.13	5.78	3.11			10.44
Metering	0.38	1.98	0.99	1.63			2.77
Other	37.39	10.08	12.27	9.87			2.79
Other non-depreciable	-0.02	-0.04	0.20	0.00			0.00
Sub total	57.30	21.98	24.13	15.21			20.30
Pipeline	50.41	15.62	4.88	0.61			4.30
Compression	33.05	8.87	5.78	3.11			10.44

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Metering	0.38					1.98	0.99	1.63		2.77
Other Fuel-gas	57.31	8.27 870	23.9 85	33.2 49	45.8 77	49.1 49	12.5522	132.653		2.79
Other non-depreciable	-0.02					-0.04	0.20	0.00		0.00
BEP Lease	21.26					0.00	0.00	0.00		0.00
Total	162.39					34.71.118	68.2122	79.6471	75.3322	101.308
							4.13	5.21	0.30	67.7
										40
										463.327

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Pipeline utilisation over the 2005 to 2010 access arrangement period (section 5)

5. PIPELINE UTILISATION OVER THE PRIOR ACCESS ARRANGEMENT PERIOD

5.1. Outlined below are



4. OPERATING EXPENDITURE 2011-15

4.1 As required by NGR 72(1)(a)(ii), Operating Expenditure for the Prior Access Arrangement Period is provided in Table 5.

Table 5: Operating expenditure 2011 to 2015 (Real \$m at 31 December 2015)

	2011	2012	2013	2014	2015
Costs other than fuel gas	74.44	68.91	67.27	-	-
Fuel Gas	12.35	9.33	9.77	-	-
Total	86.78	78.24	77.04	-	-



5. PIPELINE DEMAND

3-25.1 As required by NGR 72 (1)(a)(iii)(A), the following Tables contain the total minimum, maximum and average demand for inlet and outlet points used for the following Pipeline Services:

- (a) ~~(a)~~ Full Haul Services (see ~~Table 4~~)(Table 6);
- (b) ~~(b)~~ Part Haul (Forward Haul) Services (see ~~Table 5~~)(Table 7); and
- (c) ~~(c)~~ Back Haul Services (see ~~Table 6~~)(Table 8).

Table 6 Min, Max and Average demand over the Prior Access Arrangement Period (TJ/d) for Full Haul Pipeline Service inlet and outlet points

: Full haul demand 2011 to 2015

Full Haul Year	2011-2015 2011	2012	2013	2014	2015
Maximum Minimum quantity	560.37793.65	767.02	752.73	812.22	-
Average Maximum quantity	894.03630.52	631.80	631.31	648.89	-
Minimum Average quantity	627.04477.26	531.60	502.20	514.96	-

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Table 7 Min, Max and Average demand over the Prior Access Arrangement Period (TJ/d) for Part Haul Pipeline Service inlet and outlet points

: Part haul demand 2011 to 2015

Part Haul Year	2011-2015 2011	2012	2013	2014	2015
Maximum Minimum quantity	52.27141.26	134.18	212.13	180.53	-
Average Maximum quantity	137.24110.31	106.47	130.66	109.65	-
Minimum Average quantity	77.2391.26	83.34	51.48	69.17	-

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Table 8 Min, Max and Average demand over the Prior Access Arrangement Period (TJ/d) for Back Haul: Back haul demand 2011 to 2015

Pipeline Service inlet and outlet points

Back Haul Year	2011-2015 2011	2012	2013	2014 ³	2015
Maximum Minimum quantity	0127.47	151.58	198.65	200.97	-
Average Maximum quantity	136.67105.17	128.96	146.48	176.15	-

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³ The information for 2014 is year to date information up to [October 2014], reflecting what information was available at the time the AAI was submitted to the ERA.



Minimum quantity					
Minimum quantity	93.805.79	42.43	53.20	88.36	-

~~3.35.2.5.2~~ The information contained in the above tables above is provided in an aggregated information form. It is aggregated because, pursuant to Rule NGR 43(2) of the NGR, it contains elements of as disaggregated data would contain information which are sensitive information, the public disclosure of which could cause undue harm to the legitimate business interests of the service provider, a Shipper Operator, Shippers and/or a Prospective Shipper. Shippers.

5.3. Table 7 contains details of:

5.3 (a) As required by NGR 72(1)(a)(iii), Table 9 and Table 10 contains the following information:

- (a) The number of Shippers for each Inlet Point; (Table 9);
- (b) ~~(b)~~ The number of Shippers for all Outlet Points (in aggregate form) downstream of Compressor Station 9; and (Table 10); and
- (c) ~~(c)~~ The number of Shippers for all Outlet Points (in aggregate form) to which Part Haul and Back Haul Services are provided. (Table 10).

Table 9 Shipper number for each: Number of shippers by inlet and outlet point

Year	Number of customers	
Inlet (Receipt point)	ID	Aggregate Number of Shippers
DOMGAS Dampier Receipt	4911-01	12
Griffin		4
Harriet Group Receipt		46
MLV7 Interconnect	711-03	19
Outlet (Delivery point) Devil Creek	11-04	21
Harriet Full Haul Outlet Points	1411-02	31
Gorgon Part Haul Outlet Points	912-01	0
Macedon Back Haul Outlet Points	612-02	17
Mondarra Storage Facility	18-01	5
Red Gully	110-01	1

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5.4. The information Table 10: Number of shippers by outlet

Outlet/Delivery Point	Aggregate Number of Shippers
Full Haul Points	17
Part Haul Points	27
Back Haul Points	18

3.45.4 Information contained in the above table Table 10 for Outlet Points is aggregated information. It is aggregated because, pursuant to Rule NGR 43(2) of the NGR, as it contains elements of information which are sensitive information, the public disclosure of which could cause undue harm to the



legitimate business interests of the ~~service provider~~Operator, a Shipper and/or a~~Prospective Shipper~~Shippers.

~~**Capital Base for the 2005 to 2010 access arrangement period
(section 6)**~~

~~**6. OPENING CAPITAL BASE FOR THE 2011 to 2015 PERIOD**~~

4.6. ~~CALCULATION OF OPENING CAPITAL BASE FOR THE 2011 TO 2015 ACCESS ARRANGEMENT PERIOD~~

~~4.16.1~~ 6.1. — In accordance with ~~Rule~~ NGR 77(2) the Opening Capital Base for the ~~Current 2011 to 2015~~ Access Arrangement Period (i.e. the ~~closing~~ Opening Capital Base as at ~~31 December 2010~~ or ~~opening Capital Base~~ 1 January ~~2011~~ 2016) has been determined by the following formula:

- (a) ~~(a)~~ The Opening Capital Base as at the commencement of the Prior Access Arrangement Period (adjusted, if at all, for ~~the any~~ any difference between estimated and actual ~~Capital Expenditure made in the access arrangement period that preceded the Prior Access Arrangement Period and capital expenditure~~ included in that Opening Capital Base) ~~(the amount is in Table 8); This adjustment must also remove any benefit or penalty associated with any difference between the estimated and actual capital expenditure;~~

plus:

- (b) ~~(b)~~ Conforming Capital Expenditure made, or to be made, during the Prior Access Arrangement Period (~~being the amounts are in Table 9); and~~ Table 4;
- ~~plus~~ (c) — Capital Contributions by Shippers
- (c) ~~Any amounts to be~~ added to the ~~Capital Base~~ capital base under ~~rule 82(3) of the NGR (the amounts are in Table 10); 82, 84 or 86;~~

less:

- (d) ~~(d)~~ Depreciation over the Prior Access Arrangement Period (~~Depreciation is set out to be calculated in Table 11 accordance with any relevant provisions of the access arrangement governing the calculation of depreciation for the purpose of establishing the opening capital base); and~~

~~(e)~~ (e) Redundant assets identified during the course of the Prior Access Arrangement Period;
and

~~(e)~~ (f) The value of pipeline assets disposed of during the Prior Access Arrangement Period.

~~4.26.2~~ 6.2. — The Opening Capital Base at the commencement of the Prior Access Arrangement Period (**PAAP Opening Capital Base**) did not need amending for any expenditure incurred during the access arrangement period that preceded the Prior Access Arrangement Period because the PAAP Opening Capital Base was determined using only actual capital expenditure during that period (as opposed to forecast ~~capital expenditure~~ or ~~estimated capital expenditure~~). Accordingly, there is no requirement to move any benefit or penalty associated with any difference between the estimated and actual capital expenditure.

6.3 The Opening Capital Base as at the commencement of the Prior Access Arrangement Period (i.e. 6-1 January 2011) was \$3,805.08 million (Real dollar values as at 31 December 2015).

~~4.36.4~~ The Opening Capital Base for the ~~2011 to 2015~~ Current Access Arrangement Period has not been amended for any amounts in any of the following categories because there are no amounts during the Prior Access Arrangement Period that fall within these categories:

- (a) ~~(a)~~ Amounts to be added to the Capital Base under ~~rule 84 of the NGR; 82;~~
- ~~(b)~~ (b) Amounts to be added to the Capital Base under rule NGR 84 ; and
- ~~(b)~~ (c) Amounts to be added to the Capital Base under NGR 86 of the NGR.

6.5 ~~(e)~~ — Amounts to be subtracted from Table 11 below demonstrates how the Operator has arrived at the Opening Capital Base, being for redundant assets identified during the course of the Current Access Arrangement Period to deal with the criteria referred to in NGR 77(2)(b), (d), (e) & (f).



4.46.6 In relation to the calculation of depreciation over the Prior Access Arrangement Period, a correction has been made for over-depreciation from that period. This is to reflect the fact that certain assets will have been over-depreciated by the end of the Prior Access Arrangement Period due to the application of approved forecast depreciation and conforming capital expenditure inputs. This correction for over-depreciation is strictly an adjustment to the value of the Opening Capital Base which then flows into the calculation of the Projected Capital Base and in turn, the return on the Capital Base during the Current Access Arrangement Period. However, for the purposes of transparency, it has been accounted for in Table 11 below as a separate line item to the depreciation line item.

6.4. ~~The Opening Capital Base as at the commencement of the Prior Access Arrangement Period (i.e. 31 December 2004) was \$1,922.162 million (real dollar values as at 31 December 2010).~~

6.5. ~~The following Table 8 demonstrates how the Capital Base during the Prior Access Arrangement Period changed and how the Opening Capital Base for the Access Arrangement Period is calculated.~~

Table 11 — Calculation of the opening: **Opening capital base for the 2014 to 2015 access arrangement period (real \$ million (Real \$m at 31 December 2010/2015))**

Year ending 31	December 2010	2011	2012	2013	2014	2015	2010
Total Capital Base							
Capital Base at 1 January	1,922.1623,805.08	1,925.9793,862.99	2,317.1923,792.18	2,275.4563,709.93	2,869.3143,617.40		2,799.250
Plus							
Conforming Capital Expenditure	60.277162.39	429.96234.71	5.68024.13	657.65415.21	-1.31620.30		618.866
Forecast Capital Contributions		2.995	14.081	8.425	1.060	-	-
Correction for over-depreciation	-0.00	-0.00	-0.00	-0.00	-5.32		30.715
Less							
Redundant and disposed assets	6.9640.0	0.03500	0.02600	0.08500			0.01100
Disposed assets	4.83	0.40	0.79	1.84			0.00
Depreciation	52.49099.66	52.830105.12	55.806105.59	64.830105.90	71.295106.24		72.987
Capital base at 31 December	1,925.9793,862.99	2,317.1923,792.18	2,275.4563,709.93	2,869.3143,617.40	2,799.250	3,375.833536.78	
DBNGP assets							
Capital Base at 1 January	1,922.1623,775.14	1,922.9843,833.75	2,300.1173,764.08	2,249.9563,683.02	2,842.7533,591.73		2,772.690
Plus							
Conforming Capital Expenditure	60.277162.39	429.96234.71	5.68024.13	657.65415.21	-1.31620.30		618.866
Correction for over-	-0.00	-0.00	-0.00	-0.00	-3.36		30.715

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depreciation							
<i>less</i> Less							
Redundant and disposed assets	6.9640.00	0.03500	0.02600	0.08500	0.04100		Deleted Cells
Disposed assets	4.83	0.40	0.79	1.84	0.00		
Depreciation	52.49098.95	52.830103.98	55.806104.40	64.830104.67	71.295105.01	72.987	Deleted Cells
Capital base at 31 December	1,922.9843,833.75	2,300.1173,764.08	2,249.9563,683.02	2,842.7593,591.73	2,772.690	3,349.273510.37	Deleted Cells
Shipper-funded assets							Deleted Cells
Capital Base at 1 January	-29.94	2.99529.23	17.07628.10	25.504	26.56090	26.56025.68	Deleted Cells
<i>plus</i> Plus							Deleted Cells
Capital contribution forming capital	2.9950.00	14.0810.00	8.4250.00	1.0600.00	-0.00	-	
Correction for over-depreciation	-0.00	-0.00	-0.00	-0.00	-1.97	-	
<i>less</i> Less							
Redundant and disposed assets	-0.00	-0.00	-0.00	-0.00	-0.00	-	
Disposed assets	0.00	0.00	0.00	0.00	0.00	0.00	
Depreciation	-0.70	-1.13	-1.19	-1.23	-1.23		Deleted Cells
Capital base at 31 December	2.99529.23	17.07628.10	25.504	26.56090	26.56025.68	26.56041	Deleted Cells



7. 6.6. PROJECTED CAPITAL BASE

4.57.1 The amounts for each Projected Capital Base for the Current Access Arrangement Period is calculated in accordance with NGR 78 by way of the line items in Table 8 are broken down in the following tables formula:

- (a) the Opening Capital Base for the Current Access Arrangement Period;
plus Table 9
- (b) forecast Conforming Capital Expenditure for the Current Access Arrangement Period;
less
- (c) forecast of depreciation for the Current Access Arrangement Period.

7.2 There is no forecast value of pipeline assets to be disposed of during the Current Access Arrangement Period which is to be deducted from the Projected Capital Base.

7.3 Applying the formula above, the Projected Capital Base for each year of the Current Access Arrangement Period is outlined in Table 12.

7.4 The derivation of the values for each element of the formula above for establishing the Projected Capital Base is explained in the sections 0 & 0 of the AAI.

Table 12: Projected capital expenditure for the 2005 to 2010 access arrangement period (real \$ million base (Real \$m at 31 December 2010 & 2015))

Year	2005 2010	2006 2011	2007 2015	2008 2011	2009 2015	2010 2015	2011 2015
1.246 Capital Base (as at 1 Jan)	517,327.3 536.78	3,456 .58	489,960.376 01	1,274,354 3,290.53			3,212.86
Plus							
Forecast Conforming Capital Expenditure	23.27	21.77	17.50	19.37			24.76
Less							
Forecast Depreciation	103.47	102.3 3	102.97	97.05			87.85
Compression Forecast Asset Disposals	47,620.0 00	171.98 80.00	0.14800	132,939.0 00	-0.00		
Projected Capital Base	3,456.5 8	3,376 .01	3,290.53	3,212.86			3,149.77
DBNGP assets							
Capital base at 1 Jan	3,510.3 7	3,430 .87	3,351.01	3,266.23			3,189.27
Plus							

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Year	2005/2015	2006/2017	2007/2018	2008/2019	2009/2020	2010/2021	2011/2022
<u>Forecast Conforming Capital Expenditure</u>	23.27	21.77	17.50	19.37			24.76
<u>Less</u>							
Metering Disposed assets	-0.00	-0.00	-0.00	-0.00	0.978 00		
<u>Depreciation</u>	102.77	101.63	102.27	96.34			87.14
<u>Capital base at 31 December</u>	3,430.87	3,351.01	3,266.23	3,189.27			3,126.88
<u>Shipper assets</u>							
Capital base at 1 Jan	26.41	25.71	25.00	24.30			23.59
<u>Plus</u>							
<u>Forecast Conforming Capital Expenditure</u>	4.0670 0	0.879 00	2.3360 00	5.905 0.00	0.559 00	71.224	84.979
<u>Less</u>							
Disposed assets Other non-depreciable	-0.00	0.134 00	1.95 00.0 0	0.679 00	0.666 00		4.645
<u>Depreciation Total</u>	60.2770 70	429.96 20.70	5.6800 70	657.654 0.70	1.316 0.70	618.866	1773.75 5
<u>Capital base at 31 December</u>	25.71	25.00	24.30	23.59			22.89

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8. TABLE 10 FORECAST CONFORMING CAPITAL EXPENDITURE

8.1 Forecast Conforming Capital contributions Expenditure for the Current Access Arrangement Period is summarised in the 2006 to 2010 access arrangement period (real \$ million Table 13

Table 13: Forecast conforming capital expenditure 2016-2020 (Real \$m at 31 December 2010/2015)

Year	2016	2017	2018	2019	2020	20	Tot
Expansion	-	-	-	-	-	-	-
Pipeline	0.74900	5.08500	-0.00	-0.00	-0.00	▲	5.83
Compression	-0.00	-0.00	5.50800	-0.00	-0.00	-	5.50
Metering	2.11300	8.99600	2.01400	4.01400	-0.00	-	15.3
Other depreciable	0.13300	-0.00	0.00300	0.04500	-	▲	0.18100
Other non-depreciable	0.00	0.00	0.00	0.00	-	-	0.00
Sub total	0.00	0.00	0.00	0.00	0.00		0.00
Stay-in-business	-	-	-	-	-	-	-
Pipeline	3.67	2.48	1.63	5.33	-	-	7.55
Compression	13.61	13.97	12.44	11.65	-	-	11.59
Metering	3.60	2.68	0.85	0.64	-	-	3.10
Other	2.39	2.64	2.58	1.75	-	-	2.52
Other non-depreciable	-0.00	-0.00	-0.00	-0.00	-0.00	▲	-
Sub total	23.27	21.77	17.50	19.37	0.00		24.76
-	-	-	-	-	-	-	-
Pipeline	3.67	2.48	1.63	5.33	-	-	7.55
Compression	13.61	13.97	12.44	11.65	-	-	11.59
Metering	3.60	2.68	0.85	0.64	-	-	3.10
Other	2.99539	14.081264	8.425258	1.06075	-2.52	▲	25.5
Other non-depreciable	0.00	0.00	0.00	0.00	-	-	0.00
Total	23.27	21.77	17.50	19.37	0.00		24.76



~~Depreciation Schedule~~ The Operator's forecast Conforming Capital Expenditure for the ~~Prior~~ Access Arrangement Period

~~8.2~~ ~~6.7.~~ The depreciation schedule setting out the basis is based on which the need to ensure the Operator:

- ~~(a)~~ maintains and improves the safety of pipeline assets constituting services;
- ~~(b)~~ maintains the integrity of pipeline services;
- ~~(c)~~ complies with the regulatory obligations or requirements applicable to the DBNGP; and/or
- ~~(d)~~ maintains its capacity to meet levels of demand for pipeline services existing at the time the capital base during the Prior expenditure is forecast to be incurred (as distinct from projected demand that is dependent on an expansion of pipeline capacity) . In this regard, the forecast demand is outlined in section 10 of this AAI.

~~4.68.3~~ The forecast amounts of expenditure for the Access Arrangement Period are ~~depreciated is in~~ Table 11; the minimum amounts the Operator considers are required to meet these obligations. They are based on the outcomes of the Operator's business planning and budgeting process.



9. TABLE 11 FORECAST DEPRECIATION

9.1 A separate depreciation schedule has been determined for 5 classes of physical assets that form the DBNGP, these asset classes are provided in Table 14.

Table 14: Asset categories and asset lives

Depreciation allowances for the 2005 to 2010 access arrangement period (real \$ million at 31 December 2010)

Year ending 31 December Asset Category	2005 Asset life (years)	2006	2007	2008	2009	2010	Total
Pipeline Pipelines	32.53570	32.614	32.709	37.022	41.674	43.089	219.636
Compression	14.89430	14.972	17.695	22.339	23.939	23.955	117.795
Metering	0.70850	0.734	0.764	0.767	0.767	0.767	4.507
BEP Lease		57					
Other depreciable	4.35430	4.512	4.638	4.701	4.918	5.176	28.300
Non depreciable	-	-	-	-	-	-	-
Total	52.490	52.830	55.806	64.830	71.295	72.987	370.238

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Disposal of Assets during The Operator proposes to apply the **Prior Access Arrangement Period**

6.8. The value of pipeline assets disposed of during the Prior Access Arrangement Period and relevant asset categories of assets that these disposals relate to are provided in Table 12.

6.9. The revised access arrangement proposal should be amended so that the calculation of total revenue and reference tariffs reflects a treatment of asset disposals that comprises:

- (a) adjustment of the capital base by deduction (as "accelerated depreciation") of the value of the disposed of assets from the relevant asset classes in the asset account of the initial capital base; and
- (b) addition of the amount of accelerated depreciation Table 14 to total revenue to compensate for the reduction in the capital base.

Table 12 Value of asset disposals in the 2005 to 2010 access arrangement period (real \$ million at 31 December 2010)

Year ending 31 December	2005	2006	2007	2008	2009	2010	Total
Pipelines	-	-	-	-	-	-	-
Compressors	4.465	-	-	-	-	-	4.465
Meters	-	-	-	-	-	-	-



Other depreciable	0.080	-	0.035	0.026	0.085	0.011	0.237
Non depreciable	2.420	-	-	-	-	-	2.420
Total	6.964	-	0.035	0.026	0.085	0.011	7.122

Projected Capital Base for the 2011 to 2015 access arrangement period (section 7)

7. PROJECTED CAPITAL BASE

7.1. The Projected Capital Base for the Access Arrangement Period is calculated, in accordance with rule 78 of the NGR, by way of the following formula:

(a) the Opening Capital Base for the Access Arrangement Period;

plus

~~4.79.2(b)~~ forecast conforming capital expenditure ~~for over~~ the Current Access Arrangement Period (including forecast capital expenditure to which Shippers are expected to have contributed) Table 13 summarises this forecast expenditure;

less

(c) forecast of depreciation for the Access Arrangement Period.

7.2. There is no forecast value of pipeline assets to be disposed of during the Access Arrangement Period.

7.3. Applying the formula in clause 7.1 above, the Projected Capital Base for each year of the Access Arrangement Period is outlined in Table 16.

7.4. The derivation of the values for each element of the formula in clause 7.1 for establishing the Projected Capital Base is explained in the remainder of this section of the AAI.

Forecast Conforming Capital Expenditure 2014 to 2015

7.5. Forecast conforming capital expenditure for the Access Arrangement Period is summarized in Table 13.



Table 13 — Forecast conforming capital expenditure for the 2011 to 2015 access arrangement period (real \$ million at 31 December 2010)

Year ending 31 December	2011	2012	2013	2014	2015	Total
Expansion						
–Pipelines	13.476	-	-	-	-	13.476
–Compression	27.219	-	-	-	-	27.219
–Metering	0.141	-	-	-	-	0.141
–Other depreciable assets	45.174	-	-	-	-	45.174
–BEP Capacity	18.858	-	-	-	-	18.858
–Non-depreciable assets	-	-	-	-	-	-
–Sub-total	104.868	-	-	-	-	104.868
Stay-in-business						
–Pipelines	7.903	3.850	4.155	0.515	0.715	17.138
–Compression	8.582	6.565	2.052	2.792	5.982	25.972
–Metering	0.409	0.485	2.655	2.655	0.155	6.359
–Other depreciable assets	33.493	2.490	1.900	4.500	3.900	46.283
–BEP Capacity	-	-	-	-	-	-
–Non-depreciable assets	-	-	-	-	-	-
–Sub-total	50.386	13.390	10.762	10.462	10.752	95.752
Shipper funded assets						
–Pipelines	15.166	-	-	-	-	15.166
–Compression	2.683	-	-	-	-	2.683
–Metering	3.713	2.718	1.473	-	-	7.905
–Other depreciable assets	-	-	-	-	-	-
–BEP Capacity	-	-	-	-	-	-
–Non-depreciable assets	-	-	-	-	-	-
–Sub-total	21.562	2.718	1.473	-	-	25.754
Total						
–Pipelines	36.546	3.850	4.155	0.515	0.715	45.781
–Compression	38.484	6.565	2.052	2.792	5.982	55.875
–Metering	4.262	3.204	4.128	2.655	0.155	14.404
–Other depreciable assets	78.666	2.490	1.900	4.500	3.900	91.456
–BEP Capacity	18.858	-	-	-	-	18.858
–Non-depreciable assets	-	-	-	-	-	-
–Total	176.816	16.108	12.235	10.462	10.752	226.374

Forecast Depreciation Schedule - 2011 to 2015

~~7.7. A separate depreciation schedule has been determined for each of the 4 classes of physical assets that form the DBNGP, these 4 asset classes are:~~

- ~~(a) pipeline assets;~~
- ~~(b) compressor station assets;~~
- ~~(c) metering assets; and~~
- ~~(d) other assets.~~

~~4.89.3~~~~7.8.~~ The depreciation schedule has been designed:

- ~~(a)~~ ~~(a)~~ so that reference tariffs will vary, over time, in a way that promotes efficient growth in the market for reference services;
- ~~(b)~~ ~~(b)~~ so that each asset or group of assets is depreciated over the economic life of that asset or group of assets;
- ~~(c)~~ ~~(c)~~ so as to allow, as far as reasonably practicable, for adjustment reflecting changes in the expected economic life of a particular asset, or a particular group of assets;
- ~~(d)~~ ~~(d)~~ so that (subject to the rules about capital redundancy), an asset is depreciated only once (i.e. that the amount by which the asset is depreciated over its economic life does not exceed the value of the asset at the time of its inclusion in the capital base (adjusted for inflation)); and
- ~~(e)~~ ~~(e)~~ so as to allow for the service provider's reasonable needs for cash flow to meet financing, non-capital and other costs.

~~7.9. For the assets in each of the 4 asset classes, depreciation has been determined using the straight line method with the life of assets in each class as shown in Table 14.~~

~~4.99.4~~~~7.10.~~ The depreciation on each class of assets for the ~~period~~~~periods~~ 1999 to 2004, ~~2005 to 2010 and 2011 to 2015~~ was the depreciation used in the determination of the reference tariff applicable during that period. Similarly, the depreciation on each class of assets for the period 2005 to 2010 was the depreciation used in the determination of the reference tariff applicable during that period each of these periods.

~~4.109.5~~~~7.11.~~ The depreciation, ~~for the Access Arrangement~~ on the initial Capital Base as at 1 January 2000 and on Conforming Capital Expenditure made from 2000 to ~~2004~~~~2015~~, is determined using ~~the~~ straight line method with the following assumptions as to asset lives:

- ~~(a)~~ ~~(a)~~ In the case of the initial Capital Base as at 1 January 2000 – using the remaining asset lives for the ~~following~~ four asset classes as follows:
 - ~~(i)~~ ~~(i)~~ Pipeline assets – 54.50 years;
 - ~~(ii)~~ ~~(ii)~~ Compression assets – 19.34 years;
 - ~~(iii)~~ ~~(iii)~~ Meter station assets – 39.98 years;
 - ~~(iv)~~ ~~(iv)~~ Other assets – 16.85 years; and
- ~~(b)~~ ~~(b)~~ In the case of Conforming Capital Expenditure made from 2000 to ~~2004~~~~2015~~ – using lives in each class of asset as shown in ~~Table 14~~~~Table 14~~.



- (a) the requirement in section 7.4 the NGR to adopt a post-tax nominal approach to the calculation of the Total Revenue in each regulatory year; and

Table 16 — Projected capital base for the 2011 to 2015 access arrangement period (real \$ million at 31 December 2010)

- (b) adopting the current cost accounting approach to accounting for the capital base and using that approach in the PTRM, which requires an adjustment to be made to avoid double counting for the affect of inflation.

9.9 NGR 89(1)(d) provides that the depreciation criteria should be designed so that an asset is depreciated only once (ie that the amount by which the asset is depreciated over its economic life does not exceed the value of the asset at the time of its inclusion in the capital base (adjusted, if the accounting method approved by the ERA permits, for inflation)).

9.10 The depreciation schedule for the projected capital base as shown in Table 15 above does not address the part of the criteria in NGR 89(1)(d) requiring the adjustment for inflation. However, instead, the Operator has accounted for this part of the criteria in the calculation of the Total Revenue – see the line item in Table 25 named “Less inflationary gains on capital base”.

9.11 Accordingly, the depreciation schedule for the purposes of NGR 88 is to be construed both the information in Table 15 above and the line item in Table 25 named “Less inflationary gains on capital base”.



10. FORECAST PIPELINE CAPACITY

10.1 Table 16 provides the Capacity Forecast from 2016 to 2020.

Table 16: Capacity Forecast (TJ/day)

Year	2016	2017	2018	2019	2020
Total capital base					
Capital Base at 1 January	3,375.833	3,464.234	3,387.085	3,305.641	3,222.150
<i>plus</i>					
Forecast Conforming Capital Expenditure	154.254	13.300	10.762	10.462	10.752
Forecast Capital Contributions Total Full Haul	21.562	2.718	1.473	-716.4	-716.4
<i>less</i>					
Redundant and disposed assets	-	-	-	-	-
Depreciation	88.415	93.258	93.679	93.953	94.256
Capital Base at 31 December Total Part Haul	259,346.234	259,3387.085	259,3305.641	259,3222.150	259,3138.646
DBNGP assets Total Back Haul	217.7	216.6	216.6	216.6	216.6
Capital Base at 1 January	3,349.273	3,416.737	3,337.874	3,256.017	3,173.616
<i>plus</i>					
Conforming Capital Expenditure	155.254	13.390	10.762	10.462	10.752
<i>less</i>					
Redundant and disposed assets	-	-	-	-	-
Depreciation	87.790	92.253	92.619	92.863	93.167
Capital base at 31 December	3,416.737	3,337.874	3,256.017	3,173.616	3,091.201
Shipper-funded assets					
Capital Base at 1 January	26.560	47.498	49.210	49.624	48.534
<i>plus</i>					
Forecast Capital Contributions	21.562	2.718	1.473	-	-
<i>less</i>					
Redundant and disposed assets	-	-	-	-	-
Depreciation	0.625	1.006	1.060	1.089	1.089
Capital base at 31 December	47.498	49.210	49.624	48.534	47.445



Forecast pipeline utilisation over the 2011 to 2015 access arrangement period (section 8)

8. FORECAST PIPELINE CAPACITY AND UTILISATION

10.2 8.1. Table 17 details the forecast of Capacity Forecast is based on actual contracted capacity as of August 2014, plus anticipated new contracted firm capacity during the Current Access Arrangement Period, and minus anticipated relinquishment of contracted capacity by shippers during that same period.

4.13 10.3 Table 17 provides the Pipeline Capacity⁴ over the 2011 to from 2016 to 2020. 2015 Access Arrangement Period.

Table 17 Forecast of pipeline capacity

: Pipeline Capacity (TJ/day)

Year	2011-2015	2017-2019	2018-2019	2019-2019	2019-2019
<i>Full haul</i>					
Pipeline capacity Full Haul (TJ/day)	869845	888845	888845	888845	888845

10.4 8.2. Table 18 outlines the forecast of the The Pipeline Capacity of on the DBNGP that remains contracted for certain is determined based on the following assumptions:

- (a) For delivery of Full Haul pipeline services during, the gas composition is as follows:
 - (i) Higher Heating Value – 37.0MJ/m3;
 - (ii) Wobbe Index - 46.5MJ/m3 ;
 - (iii) the 2011 to 2015 Access Arrangement Period, and forecasts percentage content of Inert Gases of no greater than 6.39%;
 - (iv) no LPG content;
- (a)(b) the volumes of Contracted Capacity expected by ambient conditions on the Operator to be used by Shippers of these pipeline services DBNGP from Compressor Station 1 to Compressor Station 9 are average conditions for the month of January;

Table 18 Forecast of pipeline capacity

- (c) gas is being delivered for receipt into the DBNGP at existing inlet points;
- (d) the designed inlet pressure at the inlet point known as I1-01 is 8MPa; and
- (e) all compressor units are operating.

10.5 Table 18 outlines the Throughput Forecast from 2016 to 2020.

⁴ Pipeline Capacity means the capacity to deliver firm pipeline services to any outlet point immediately downstream of compressor station 9 on the DBNGP.



Table 18: Throughput Forecast

Year	2011-2015	2017-2013	2018-2013	2019-2014	2020-2015
<i>Full-haul</i>					
Contracted capacity (TJ/day) Total Full Haul	851.6	860.3	860.3	860.3	860.3
Throughput (TJ/day)	703.4	718.8	719.7	725.8	732.5
<i>Part-haul (forward-haul)</i>					
Contracted capacity (TJ/day)	215.4	215.4	215.4	215.4	215.4
Throughput (TJ/day)	191.5	189.7	189.7	189.7	189.7
<i>Part-haul (forward-haul)</i>					
Contracted capacity (TJ/day) Total Part Haul	130.0	130.0	130.0	130.0	130.0
Throughput (TJ/day) Total Back Haul	412.3	412.3	412.3	412.3	412.3

10.6 Throughput Forecast is based on a combination of current usage levels, contracted capacity, historical throughput growth rates, publicly available information and shipper provided throughput forecasts.



5.11. FORECAST OPERATING EXPENDITURE (SECTION 9)

9. FORECAST OPERATING EXPENDITURE

5.11.1 9.1 Forecast operating expenditure over the Access Arrangement Period for 2016 to 2020 is shown in Table 19. Table 19.

Table 19: Forecast of operating expenditure for the 2011 to 2015 access arrangement period (real \$ million 2016-20 (Real \$m at 31 December 2010/2015)

	2016	2017	2018	2019	2020	Total
Year ending 31 December/Wages & salaries	201429.50	201230.08	30.67 2013	31.27 2014	201531.88	
Fuel gas/Non-field expenses	20.38515.36	15.21.538	21.44615.54	21.84216.26	22.28517.08	107.496
Field Expenses	15.96	17.87	19.41	15.64		15.53
Government charges	8.29	8.29	8.29	8.29		8.29
Reactive maintenance	1.40	1.40	1.40	1.40		1.40
Costs other than fuel/System use gas	73.00838.93	78.23138.22	83.49538.74	85.56239.30	86.67639.94	406.971
Total	93.393109.45	99.769111.07	104.940114.05	107.404112.16	108.964114.12	514.467

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Key Performance Indicators (section 10)

10. KEY PERFORMANCE INDICATORS

11.2 10.1 The Operator's forecast Operating Expenditure for the Access Arrangement Period is based on the following:

- the outcomes of its business planning and budgeting process; and
- the need for the forecast to be that which would be incurred by a prudent service provider acting efficiently in accordance with accepted industry practice, to achieve the lowest sustainable cost of delivering pipeline services.

12. KEY PERFORMANCE INDICATORS

~~5.2~~12.1 One key performance indicator supports the expenditure to be incurred during the Current Access Arrangement Period. That indicator is to compare the forecast operating expenditure for each year against the actual forecast operating expenditure (except for the expenditure items listed below) for that same year of the Access Arrangement Period:

- (a) ~~(a) forecast~~Forecast expenditure for System Use Gas; and
- (b) ~~(b) forecast~~Forecast expenditure for government imposts.

~~5.3~~12.2 ~~10.2~~—The reasons for why it is relevant to include this KPI as stated in ~~clause 10.2~~paragraph 12.1 are:

- (a) ~~(a) Most of~~ the firm full haul capacity of the DBNGP is fully contracted for the Access Arrangement Period under Access Contracts for non-reference services;
- (b) ~~(b)~~ the tariffs payable under these non-reference service Access Contracts are structured in such a way that the Operator is incentivised to reduce its operating expenditure to the lowest sustainable costs;
- (c) ~~(c)~~ the non-reference services are structured in a way that the Operator has limited control of the throughput on the DBNGP and therefore, expenditure for System Use Gas will be largely driven by the throughput requirements of Shippers; and
- (d) ~~(d) there has been a significant increase~~continues to be increases in government imposts ~~since 2005~~ and the Operator is forecasting a continued steep increase in this type of expenditure during the Access Arrangement Period. Operator has limited control over the level of government imposts imposed on it.

13. RATE OF RETURN

13.1 In accordance with NGR 72(1)(g) and, (ga), this section describes:

the Operator's return (section 11)

11. RATE OF RETURN

11.1. ~~The on equity, return on debt and the Rate of Return used to determine the Total Revenue, and therefore the Reference Tariff, has been set in accordance with the requirements of Rule 87 of the NGR.~~

(e)(a) 11.2. ~~The Rate of Return to be used in determining Total Revenue, for each regulatory year of the Access Arrangement Period is 5.77% (real, pre-tax), in accordance with NGR 87;~~

11.3. ~~The Rate of Return has been established as a real pre tax weighted average of the cost of equity and the cost of debt.~~

11.4. ~~The cost of equity has been determined the departures made by the Operator from the capital asset pricing model (CAPM).~~

11.5. ~~The cost of debt has been determined from observations of implied yields on traded corporate bonds with credit ratings of BBB to BBB+.~~

(f)(b) 11.6. ~~Parameter values applied in determining the rate of return are methodologies set out in Table 20 the Guidelines and the reasons for each departure; and~~

(g)(c) Table 20 ~~Parameter values the formula that is to be applied, in determination of the rate of accordance with NGR 87(12), to vary the return on debt.~~

Allowed Rate of Return

13.2 Subject to paragraph 13.3, the Operator's return on equity, return on debt and the Rate of Return, for each regulatory year of the Access Arrangement Period, in accordance with NGR87, is outlined in Table 20.

13.3 As outlined in section 11 of the Current Access Arrangement, the return on debt will be, or will potentially be, different for different regulatory years in the Access Arrangement Period as a result of applying the Reference Tariff Variation mechanism known as the "Trailing Average Cost of Debt Annual Update". Because the resultant variation to the return on debt that arises from applying this mechanism will not be known in advance, it is not possible to outline at the commencement of the Access Arrangement Period what the return on debt will be for each regulatory year of the Access Arrangement Period.

Table 20: Rate of Return

Parameter/Element	Value
Nominal Risk Free Rate (R_f)	3.80%
Real Risk Free Rate (R_f^r)	1.02%
Inflation Rate π_e	2.75%

Debt Proportion (D)	60%
Return on Equity Proportion (E) (nominal post-tax)	4011.71%
Cost of Debt: Debt Risk Premium (DRP) (BBB+) Return on Debt (nominal pre-tax)	3.1436.13%
Cost of Gearing Ratio (Debt: Debt Issuing Cost (DICE) Equity)	0.125%60:40
Cost of Debt: Risk Margin (RM)	3.268%
Australian Market Risk Premium (MRP)	6%
Equity Beta (β_e)	0.8
Corporate Tax Rate (T_c)	30%
Franking Credit (γ)	25%
Nominal Cost of Debt (R_d^n)	7.07%
Real Cost of Debt (R_d^r)	4.20%
Nominal Pre Tax Cost of Equity ($R_e^{n,pre-tax}$)	11.10%
Real Pre Tax Cost of Equity ($R_e^{r,pre-tax}$)	8.12%
Nominal After Vanilla WACC / Post Tax Cost of Equity ($R_e^{n,post-tax}$) Nominal WACC	8.6036%
Real After Tax Cost of Equity ($R_e^{r,post-tax}$)	5.69%

Taxation (section 12)

12. METHOD FOR DEALING WITH TAXATION

12.1. An implicit allowance Departures from the Guidelines

13.4 The Guidelines form the primary basis on which the Rate of Return has been estimated.

However, there are some additional methodologies that have been used by the Operator to estimate the Rate of Return and also some departures from the methodologies outlined in the Guidelines. These are outlined in the table below.

Table 21: Level of consistency with the Guidelines

Matter in Guideline	DBR position vis-à-vis Guidelines	AAI Para Reference
Nominal post tax model	Consistent	13.5(a)
WACC Approach	Consistent	13.5(b)



Matter in Guideline	DBP position vis-à-vis Guidelines	AAI Para Reference
Definition of Benchmark efficient entity	Consistent	13.5(c)
Approach to Gearing	Consistent	13.5(d)
Methodology for setting term of risk-free rate of return	Departure	13.8(b) & 13.11(a)
Methodology for estimating Inflation	Minor departure	13.14
Methodology for estimating Gamma	Minor departure	13.15
Return on equity - Stage 1		
Methodology for determining the relevance of a model	Departure	13.6, 13.7 & 13.16
Return on equity - Stage 2		
Use of ranges versus point estimates	Minor departure	13.8(a), 13.16 & 13.17
Return on equity - Stage 3		
Use of ranges versus point estimates	Minor departure	13.8(a), 13.16 & 13.17
Return on equity - Stage 4		
Methodology for assessing consistency between returns on debt and on equity	Addition	13.9, 13.20 & 13.21
Return on equity - Stage 5	Consistent	
Return on debt		
Formula to be used for Return at commencement of Access Arrangement Period	Minor departure	13.5(e) and 13.11(c)
Methodology for setting term of risk-free rate	Departure	13.8(b) & 13.11(a)
Benchmark credit rating used in estimating Debt Risk Premium	Consistent	13.5(f)
Addition of new issue premium	Addition	13.11(c)
Cross Checking the debt risk premium	Minor departure	13.11(b) 13.19
Methodology for annual update of Return on Debt	Departure	13.12, 13.22 & 13.23

Summary of approach to estimating Rate of Return and reasons for departures from Guidelines

Overarching matters

13.5 Consistent with the Guidelines, in estimating the Rate of Return, the Operator has:

- (a) used a model similar to the AER's post tax revenue model as the basis for using a nominal vanilla rate of return;
- (b) adopted a WACC approach expressed as follows:

$$WACC_{vanilla} = E(r_e) \frac{E}{V} + E(r_d) \frac{D}{V}$$

where

$E(r_e)$ is the expected return on equity;

$E(r_d)$ is the expected return on debt;

E/V is the proportion of equity in total financing (comprising equity and debt); and

D/V is the proportion of debt in total financing.

(c) adopted the definition of benchmark efficient entity as proposed by the ERA in the Guidelines - being an efficient "pure-play" regulated gas network business operating within Australia without parental ownership⁵, with a similar degree of risk as that which applies to the service provider in respect of the provision of reference services;

(d) used the same gearing level as in the Guidelines⁶ - so the value E/V in the WACC formula above is 40% and the value D/V in the above formula is 60%;

(e) used the following formula to estimate the return on debt for the first year of the Access Arrangement Period (being an adjustment to the formula used in the Guidelines):

$$\text{Return on Debt} = \text{Risk Free Rate} + \text{Debt Risk Premium} + \text{Debt Raising Costs} + \text{Hedging Costs} + \text{New Issue Premium}$$

(f) for the purposes of estimating the Debt Risk Premium, assumed that the benchmark credit rating is to encompass the BBB-/BBB/BBB+ credit band.

Return on Equity - Stages One to Four

13.6 In respect of the return on equity, the Operator has followed the ERA's five-stage process, with three key departures.

13.7 At Stage One, the Operator considers that, if models are to have a role in empirical estimation of the return on equity (as required by NGR 87(5)(a)) they must have a theoretical grounding and be capable of being shown to be empirically relevant. The ERA has provided only a principled assessment of models, but has not undertaken an empirical assessment of model outcomes to assess their relevance. We consider this may be sufficient to use such a model as a cross check (Stage Four of the ERA's process), but that it would be incorrect to use such a model as the primary means of estimating the return on equity (Stages Two and Three of the ERA's process). The Operator has developed such an empirical assessment; the "model adequacy test", which is actually three different statistical tests. They are based upon the very simple notion that, when model predictions are compared with actual subsequent outcomes, the predictions should not exhibit any statistically significant upward or downward bias. Assessing models against a benchmark such as this is consistent with, and is indeed a mathematical representation of the ERA's own NPV=0 condition outlined in the Guidelines. These three statistical tests that make up the model adequacy test also assist in demonstrating compliance with the Revenue and Pricing Principles which it summarises. Only models which pass both tests are used in Stages Two and Three of the ERA's process.

13.8 At Stages Two and Three two departures from the Guidelines have been ~~made for~~

(a) Firstly, ranges, rather than point estimates, should be used in the application of each relevant model. The key reason is that these ranges from an input into the cross checks to be undertaken at Stage Four. This departure is made because, consistency with the reasoning of the AEMC, it is crucial that all relevant information be carried forward as far as is practicable in the estimation process, and that the exercise of judgement should not solely be used to discard information along the way.

(b) Secondly, in estimating the risk free rate used in all models, a ten-year term is used rather than the five-year term used by the ERA in the Guidelines. This is so, for the reasons outlined in paragraph 13.11(a).

⁵ Guidelines, para 58.

⁶ Guidelines, para 67

13.9 At Stage Four, the Operator examines the results from models used to calculate the return on equity at Stages Two and Three of the ERA's five-stage process with a series of cross checks. Cross checks play a greater role in our approach than is the case in the Guidelines - the ERA appears to have reservations in its Guidelines concerning the cross checks it proposes and even in the ATCO Draft Decision, it used them sparingly, with a focus only on elements of the SL-CAPM, rather than the overall return on equity.

13.10 Furthermore, the Operator utilises a cross-check the ERA noted as one potential cross-check in its Guidelines (but did not explain the methodology for how it might be implemented); being the consistency between calculated debt and equity premia. We have therefore added to the Guidelines by outlining a methodology for this cross check. This is done using the notion first suggested by Merton (1974) that debt and equity are options on the same underlying asset, and can thus be priced as options. The reason for using this approach as an additional methodology at Stage Four is that, consistent with the reasoning of the AEMC, it first makes use of as much information as is available on the return on equity from examining equity data. These estimates are then refined using information from the return on debt.

Return on Debt

13.11 In respect of debt, a departure is made from the Guidelines in respect of the methodology used in the estimation of the cost of debt at the outset of the Access Arrangement Period, but this departure is done in a way almost identical to the approach the ERA itself follows in the ATCO Draft Decision⁷. The only differences between the Operator's approach and that of the ERA in the ATCO Draft Decision are that:

- (a) a ten-year risk free rate is used instead of the five-year rate used in the Guidelines. The Operator considers the ERA is incorrect in the use of the five-year risk-free rate (something which affects equity as well) because the more standard regulatory and commercial practice is to use the ten-year rate; and
- (b) The Operator has also used a version of the Nelson-Siegel model to cross check against the econometric packages the ERA uses to estimate the debt risk premium.
- (c) A new issue premium of 27 basis points has been added to the cost of debt. This reflects the requirements of Rule 87(10) that the Operator receive a return associated with raising debt which implies a new issuance of debt and reflects the fact that, empirically, new debt issuances require higher yields than secondary debt to induce the market to take on large chunks of debt over short periods of time.

13.12 In respect of the ERA's annual updating approach outlined in the Guidelines, while the ERA has itself departed from it in the ATCO Draft Decision, the Operator also departs from it but in a different manner. The Operator's reason for the departure is that the approach proposed by the ERA is likely to be fraught with practical implementation issues which will prevent it from meeting the ARORO in practice. Instead, the Operator has adopted an annual updating approach based on that outlined by the AER in its rate of return guidelines made and published in 2013. The Operator considers that this approach meets the ERA's efficiency criteria better than the ERA's approach itself does. The Operator has modified the AER's approach slightly such that, not only is there a ten-year transition period at the outset of the switch to this new approach, but every block of capital expenditure made in an Access Arrangement Period in excess of a certain threshold (being a tenth of the capital base) itself has a ten-year transition period. This is so that stale information is not reflected in new assets, potentially creating perverse investment incentives and inefficiencies. This results in a weighted average trailing average that is marginally more complex than the AER's approach, but is easily implemented via a simple spread sheet model. More details are outlined in section 11.6 of the Current Access Arrangement.

Other departures from the Guidelines

⁷ ERA Draft Decision on Proposed Revisions to the Access Arrangement for the Mid- West and South-West Gas Distribution System, dated 14 October 2014



13.13 The two non-rate of return issues in the Guidelines where there has been a departure relate to the methodologies for estimating inflation and gamma.

13.14 In respect of inflation, while the same approach is followed as the ERA follows, the Operator has used more than two bonds to undertake the linear interpolation which derives the inflation rate (the same is true for the risk-free rate).

13.15 In respect of gamma, while the approach in the Guidelines (and not the ATCO Draft Decision) of using dividend drop-off analysis is followed, there is a departure in that the Operator has based its results on the peer-reviewed academic literature and not on the non-reviewed approach taken by the ERA itself. The reason for this departure is that it gives greater confidence that it will be a better estimate and is one that is arrived at on a transparent and reasonable basis.

Implementation of Approach to estimating Rate of Return

13.16 In respect of the return on equity, the Operator re-examined the principled analysis the ERA undertook in the Guidelines and came to different conclusions than the ERA in its Guidelines; accepting that the Black CAPM, the Fama-French model and the DGM may be relevant models. However, when the second leg of the model relevance definition is undertaken and the model adequacy test is applied, the evidence is such that the FFM and the ERA's own approach to the empirical Sharpe Lintner Capital Asset Pricing Model (SL-CAPM) provide statistically biased results. The Black CAPM is statistically unbiased, and is thus considered a relevant model. However, mindful of the regulatory history in using the SL-CAPM formula, the Black CAPM is adapted such that the information in the zero-beta premium is reflected in the beta of the SL-CAPM rather than a distinct parameter in its own right, and accordingly the Operator implements a SL-CAPM formula with this new beta, which is termed "betastar". This is consistent with both past regulatory and current commercial practice where the formula for the SL-CAPM may be used, but the empirical estimate of beta is formed exogenously. The mean of this betastar model provides the best estimate of the return on equity but, in keeping with the notion of model adequacy and statistical bias, as well as our decision to keep as much information "live" through the process as we can (to avoid final results being influenced by judgement in a non-transparent way), we examine values for betastar drawn from points on its confidence interval (rather than just the mean) to ascertain what level of betastar gives a biased downwards and unbiased outcome. The results of following this approach are shown in Table 22, which also shows, for convenience, the relevant values that would apply if the 95th percentile of the SL-CAPM were used (in conjunction with a ten-year risk-free rate) and the values from the recent ATCO and Jemena Draft Decisions made by the ERA and AER respectively. We note that most model results put forward by service providers around the country and made by market analysts outside the regulatory sphere fall within the unbiased range of betastar below, as does the actual return earned by stocks in a portfolio with the same beta as the benchmark efficient entity; it is the regulatory decisions that are clear outliers in this respect.

Table 22: Return on equity range

	Beta	RFR	MRP	R _e
20th percentile estimate of betastar	0.94	3.54	6.5	9.67
99th percentile estimate of betastar	1.57	3.54	6.5	13.72
95th percentile of SL-CAPM beta	0.65	3.54	6.5	7.74
ERA ATCO decision	0.7	2.95	5.5	6.80
AER Jemena decision	0.7	3.55	6.5	8.10

13.17 The values for betastar are much higher than the range of values for beta which the ERA used in the Guidelines, and indeed the upper limit is higher than one. The Operator does not suggest that the benchmark efficient entity is riskier than the market as a whole; the usual interpretation of a beta greater than one. Instead, betastar reflects both systematic risk and the zero beta premium, which itself reflects the fact that investors cannot borrow and lend at the risk-free rate (the key difference in assumptions between the Black and SL-CAPM). In fact, the Black CAPM model

which underpins the formation of betastar uses a level of systematic risk identical to the mean (and lower than the 95th percentile the ERA uses) beta in the SL-CAPM. Betastar is thus not reflecting high systematic risk, but rather more information than the standard empirical beta in the SL-CAPM. The same is true of the ERA's use of the 95th percentile for beta in the application of the SL-CAPM.

13.18 The Operator's estimates of the return on debt are summarised in Table 23.

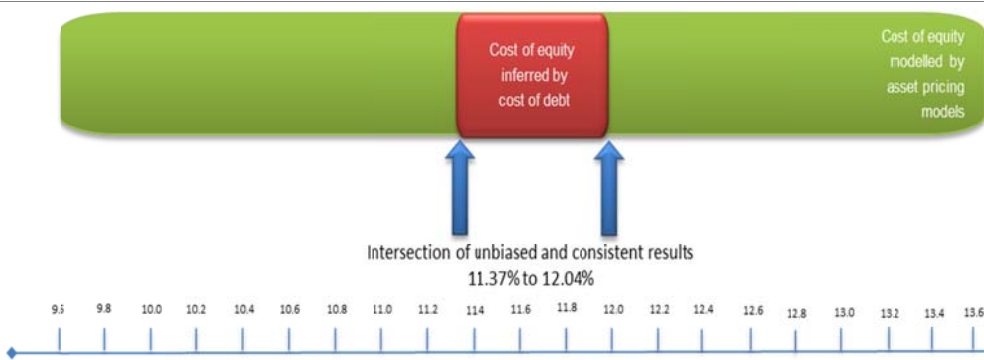
Table 23: Return on debt range

	Yield	Spread to swap	Swap rate	Yield implied by spread to swap
Gaussian Normal	5.67	1.80	3.85	5.65
DBP Nelson Siegel	5.76	1.85	3.85	5.70
ERA Nelson Siegel	5.77	1.86	3.85	5.71
Nelson Siegel Svensson	5.75	1.81	3.85	5.66

13.19 Using the information in Table 23, and a cost of debt placement and hedging (consistent with the Guidelines) of 0.15 per cent and a new issue premium of 0.27 per cent (a departure from the Guidelines) provides a range from 6.08 to 6.19 per cent, and an average estimate of 6.13 per cent.

13.20 In respect of consistency, the cost of equity implied by the range of debt estimates above (converted to expected, rather than promised cost of debt, and with the cost of debt placement and hedging and the new issue premium removed) using the most conservative assessment of the elasticity between debt and equity that the data will permit is mapped against the range from the unbiased asset pricing models in Figure 1. The intersection between the two ranges provides the cross check of the cost of equity, as per Stage Four of the ERA's five stage process.

Figure 1: Consistency cross check between debt and equity



13.21 The range of return on equity estimates which are both unbiased and consistent with the return on debt estimates is 11.37% to 12.04%. From this range, the Operator has chosen the mid-point of that range, giving a cost of equity of 11.71%. When coupled with a return on debt of 6.13 per cent and a gearing of 60 per cent, this gives a Nominal Vanilla WACC of 8.36%.

Formula for varying the Return on Debt

13.22 As outlined in paragraph 13.12, the return on debt may vary in each regulatory year of the Current Access Arrangement Period.



13.23 For the purposes of NGR 72(1)(ga), the formula that is to be applied, in accordance with NGR 87(12), to vary the return on debt is the Trailing Average Cost of Debt Annual Update, as outlined in clause 11.6 of the Current Access Arrangement.



14. ESTIMATED COST OF CORPORATE INCOME TAX

~~5.4~~14.1 In accordance with NGR72(1)(h), this section outlines the estimated cost of corporate income tax through the use of a value for the Rate of Return that is determined on a pre-tax basis calculated in accordance with NGR87A, including the proposed value of imputation credits referred to in NGR 87A.

~~Incentive Mechanism (section 13)~~

~~13. EFFICIENCY CARRYOVER [R. 72 (1)(i)]~~

~~14.2~~ 13.1. The forecast Total Revenue also makes allowances in 2011 and 2012 Operator's estimated cost of corporate income tax for amount each regulatory year of an access arrangement period (ETCt) is to be estimated in accordance with the following formula:

$$ETC_t = (ETI_t \times r_t) (1 - \gamma)$$

Where

- (i) ~~ETI_t is an estimate of the taxable income for that regulatory year that would be earned by a benchmark efficient entity as a result of the application of the incentive mechanism under the Prior Access Arrangement provision of reference services if such an entity, rather than the service provider, operated the business of the service provider;~~

— These amounts are as follows:

- (a) ~~2011 – \$11.938 million; and~~
 (ii) ~~(b) 2012 – \$11.938 million;~~ ~~r_t is the expected statutory income tax rate for that regulatory year as determined by the AER; and~~
 (iii) ~~γ is the value of imputation credits.~~

14.3 The value of imputation credits is 25% (0.25)

14.4 The result of applying the formula above is outlined in the Table 24.

Table 24: Estimated cost of corporate income tax (Real \$m 31 December 2015)

	2015	2017	2018	2019	2020
Gross estimated cost of corporate income tax	35.40	34.85	35.08	36.33	37.99
Less	-	-	-	-	-
Imputation Credits	8.85	8.71	8.77	9.08	9.50
Estimated cost of corporate income tax	26.55	26.13	26.31	27.25	28.49



6.15. TARIFF SETTING APPROACH (SECTION 14)

14. TARIFF SETTING APPROACH [R. 72 (1)(j)]

~~6.415.1~~ 14.1. — Subject to ~~clause 14.3, paragraph~~ 15.3, each of the Reference Tariffs (being the T1 Tariff, P1 Tariff and B1 Tariff) has been designed to recover from Shippers using each of the Reference Services that portion of the Total Revenue that reflects:

- (a) ~~(a)~~ those costs (including capital costs) which are directly attributable to the provision of the Reference Services; and
- (b) ~~(b)~~ a share of those costs (including capital costs) which are attributable to provision of the Reference Services jointly with Pipeline Services provided to other Shippers with contractual rights existing prior to the commencement of this Current Access Arrangement Period and other Pipeline Services which the Operator considers are reasonably foreseeable to be offered during the Access Arrangement Period.

~~6.215.2~~ 14.2. — In determining the Reference Tariffs for the T1 Service, P1 Service and B1 Service, costs have been allocated to the Services provided to Shippers with Access Contracts entered into prior to the commencement of the Current Access Arrangement Period, as if those Shippers had been provided with the respective Reference Services.

~~6.315.3~~ 14.3. — In accordance with section 12 of the Access Arrangement, the Operator and Nominees will not benefit, through increased revenue, from each amount of Funded Capital Expenditure that has been rolled into the Capital Base. So, subject to clause 12.4(b) of the Current Access Arrangement, the portion of the Total Revenue for each year of the Current Access Arrangement that equals the sum of the return on the Funded Capital Expenditure and the depreciation of the Funded Capital Expenditure will not be allocated to any pipeline service, including the Reference Tariffs.

~~6.415.4~~ 14.4. — The Reference Tariffs are designed:

- (a) ~~(a)~~ to generate from the provision of the Reference Services the portion of Total Revenue attributable to provision of the Reference Services;
- (b) ~~(b)~~ to generate from a Shipper or class of Shippers to which a Reference Service is provided, the portion of Total Revenue referable to providing the Reference Service to the Particular Shipper or class of Shippers; and
- (c) ~~(c)~~ consistently with the revenue and pricing ~~and revenue~~ principles in the NGL.

~~6.515.5~~ 14.5. — For the purpose of recovery of costs from Shippers and of earning the portion of Total Revenue attributable to the Reference Services, each of the Reference Tariffs are divided into a two part tariff structure:

- (a) ~~(a)~~ Capacity Reservation Tariff; and
- (b) ~~(b)~~ Commodity Tariff.

Capacity Reservation Tariff

~~6.615.6~~ 14.6. — The Capacity Reservation Tariff for each Reference Service, when applied to determine the Capacity Reservation Charge, recovers from each Reference Service Shipper a proportion of the return and depreciation on, and a proportion of the operating expenditure incurred in operating and maintaining, the DBNGP other than those assets that make up the DBNGP for which a capital contribution has been made by a Shipper.

~~6.715.7~~ 14.7. — In accordance with the terms of the Access Contract Terms and Conditions for each Reference Service:

- (a) ~~(a)~~ the Shipper must pay a Capacity Reservation Charge for each Gas Day during the Period of Supply regardless of whether the Shipper provides Gas at any Inlet Point and regardless of whether the Shipper takes Gas at any Outlet Point; and
- (b) ~~(b)~~ the Capacity Reservation Charge is the aggregate of the Shipper's Contracted Capacity for the Reference Service at each Outlet Point multiplied by the Capacity Reservation Tariff.

~~6.8~~~~15.8~~ ~~14.8~~—The Capacity Reservation Tariff is a number of dollars per GJ of Contracted Capacity for the T1 Service and per GJ of Contracted Capacity per kilometre for the P1 Service and B1 Service and is:

- (a) ~~(a)~~ as at the commencement of the Access Arrangement Period - as specified in the Current Access Arrangement;
- (b) ~~(b)~~ otherwise varied in accordance with clause 11 of the Current Access Arrangement.

Commodity Tariff

~~6.9~~~~15.9~~ ~~14.9~~—The Commodity Tariff for each Reference Service, when applied to determine the Commodity Charge, recovers from the Shipper a proportion of the forecast Operating Expenditure (including, but not limited to, the cost of the System Use Gas used on the DBNGP and a proportion of the forecast cost of carbon tax.)

~~6.10~~~~15.10~~ ~~14.10~~—In accordance with the terms of the Access Contract Terms and Conditions, the Shipper must pay a Commodity Charge for each Gas Day during the Period of Supply by calculating the multiple of the Commodity Tariff and each GJ of Gas Delivered to the Shipper up to Contracted Capacity for the relevant Service at all Outlet Points by the Operator on that Gas Day.

~~6.11~~~~15.11~~ ~~14.11~~—The Commodity Tariff is:

- (a) ~~(a)~~ for the T1 Service, a number of dollars per GJ of gas actually Delivered to any Outlet Point on the DBNGP; and
- (b) ~~(b)~~ for the P1 Service and B1 Service, a number of dollars per GJ of gas actually Delivered to any Outlet Point per kilometre.

Other tariff matters

~~6.12~~~~15.12~~ ~~14.12~~—The Shipper using a Reference Service is required to pay Other Charges as required by the Access Contract Terms and Conditions.

~~6.13~~~~15.13~~ ~~14.13~~—The Capacity Reservation Charge, the Commodity Charge and all Other Charges, as determined in accordance with the Access Contract Terms and Conditions, are exclusive of GST.

7.16. REFERENCE TARIFF VARIATION MECHANISM RATIONALE (SECTION 15)

15. REFERENCE TARIFF VARIATION MECHANISM RATIONALE

~~7.416.1~~ ~~15.1.~~ — ~~Rule~~ ~~NGR~~ 92 ~~of the NGR~~ requires inclusion of a Reference Tariff Variation Mechanism to be included in the Access Arrangement.

~~7.216.2~~ ~~15.2.~~ — ~~Rule~~ ~~NGR~~ 97 ~~of the NGR~~ provides that a Reference Tariff Variation Mechanism may provide for variation of a Reference Tariff:

- (a) ~~(a)~~ in accordance with a schedule of fixed tariffs;
- (b) ~~(b)~~ in accordance with a formula set out in the Access Arrangement; or
- (c) ~~(c)~~ as a result of a cost pass through for a defined event (such as a cost pass through for a particular tax).

~~7.316.3~~ ~~15.3.~~ — The Current Access Arrangement contains a Reference Tariff Variation Mechanism that is made up of 45 parts – see section 11 of the Access Arrangement:

- (a) ~~(a)~~ CPI Formula Variation;
- (b) ~~(b)~~ Tax Changes Variation;
- (c) ~~(c)~~ ~~(e)~~ New Costs Pass Through Variation;
- ~~(e)(d)~~ Revenue cap adjustment; and
- ~~(d)~~ — Any variation mechanism that is otherwise included in the Reference Service Access Contract Terms and Conditions.
- (e) ~~15.4.~~ — Rule 92(2) Trailing Average Cost of the Debt Annual Update.

~~7.416.4~~ ~~NGR~~ 92(2) requires each that the Reference Tariff Variation Mechanism to be designed to equalize~~equalise~~ (in terms of present values):

- (a) ~~(a)~~ forecast revenue from Reference Services over the Access Arrangement Period; and
- (b) ~~(b)~~ the portion of Total Revenue allocated to Reference Services for the Access Arrangement Period.

~~7.516.5~~ ~~15.5.~~ — ~~Rule~~ ~~NGR~~ 97 ~~of the NGR~~ also sets out criteria that the Reference Tariff Variation Mechanism must meet. They are that the Reference Tariff Variation Mechanism has regard to:

- (a) ~~(a)~~ the need for efficient tariff structures;
- (b) ~~(b)~~ the possible effects of the reference tariff variation mechanism on the administrative costs of the regulator, the service provider, and users or potential users;
- (c) ~~(c)~~ the regulatory arrangements (if any) applicable to the relevant reference services before the commencement of the proposed reference tariff variation mechanism;
- (d) ~~(d)~~ the desirability of consistency between regulatory arrangements for similar services (both within and beyond the relevant jurisdiction); and any other relevant factor.

~~15.6.~~ ~~Accordingly, each part of the Reference Tariff Variation Mechanism is justified against these criteria as follows:~~

~~15.7.~~ ~~In relation to the CPI Formula Variation formula:~~

- (a) ~~The Reference Tariff in the Access Arrangement is set using real, December 2009 values. Therefore, if the tariff components are not periodically varied for the effects~~



~~of inflation during the Access Arrangement Period, the Operator will not have the opportunity of recovering its efficiently incurred – nominal – costs of providing Reference Services.~~

- ~~(b) The Access Arrangement provides for annual inflation adjustment of the reference tariff using the CPI, All Groups, Weighted Average of Eight Capital Cities.~~
- ~~(c) The formula will not impact on the administrative costs of the Regulator.~~
- ~~(d) The formula is consistent with the variation mechanism in the Prior Access Arrangement Period and with variation mechanisms in access arrangements for other covered pipelines.~~

~~15.8. In relation to the Tax Change Variation formula:~~

- ~~(a) The Access Arrangement contains amounts for certain types of Taxes that are likely to be incurred by the Operator but does not contain amounts:
 - ~~(i) where the precise quantum of the costs is not certain; and~~
 - ~~(ii) where those uncertain costs are expected to be significant in their quantum.~~~~
- ~~(b) Therefore there is a significant risk that without this formula:
 - ~~(i) if an amount is not included or an insufficient amount is included, the Operator would be adversely affected and not be able to recover its costs; or~~
 - ~~(ii) if an amount is included and this amount is significantly larger in quantum than the actual expenditure for this item, the Operator would recover more than its costs for providing the Reference Services.~~~~
- ~~(c) So, this formula will ensure that forecast revenue from Reference Services over the 2011 to 2015 Access Arrangement Period will be equalised (in terms of present values) with the portion of Total Revenue allocated to the Reference Service for the 2011 to 2015 Access Arrangement Period.~~
- ~~(d) In the case of other Taxes, there is a requirement for a review to be undertaken of the fees payable to the State under the Dampier to Bunbury Pipeline Act 1998 in relation to rights granted to the Operator for the use of the DBNGP corridor. The State has issued invoices to the Operator for a revised fee although these are previously under review by the State.~~
- ~~(e) It is therefore appropriate that a formula be included to ensure there is no under recovery or over recovery of amounts for such Tax Changes and that Shippers are reimbursed for any over recovery.~~

~~15.9. In relation to the New Costs Pass Through Variation:~~

- ~~(a) It allows the Operator to recover certain costs which are beyond its control, and which could not be predicted with any great certainty prior to the time at the revisions to the Access Arrangement was approved but which relate to defined events.~~
- ~~(b) This is an efficient tariff structure as the Operator will neither over recover nor under recover, and the Shipper will pay a Reference Tariff that reflects the costs of providing the Reference Service.~~



~~(c) This formula is largely consistent with regulatory arrangements in place for other transmission pipelines.~~

~~(i) In Western Australia, there is no other provider of services similar to the Reference Services provided by the Operator. There is, therefore, no issue of consistency between the Reference Tariff Variation Mechanism and regulatory arrangements for similar services.~~

~~Un-used section (section 16)~~

~~16. NOT USED~~

~~This has been left intentionally blank~~

~~Total Revenue (section 17)~~

~~17. TOTAL REVENUE~~

~~17.1. Calculation of Total Revenue~~



17. (A) — THE TOTAL REVENUE FOR EACH TOTAL REVENUE

~~7.6~~17.1 ~~The Total Revenue for each regulatory~~ year of the Access Arrangement Period has been calculated using the building block approach described in ~~Rule NGR 76 of the NGR.~~

~~7.7~~17.2 ~~(b) — The This means that the~~ Total Revenue for each regulatory year of the Access Arrangement Period has been calculated as the sum ~~over the Access Arrangement Period of the costs in each year of the Access Arrangement Period that comprise the sum in each year of of:~~

~~(i) — a~~ A return on the projected capital base for the year;

~~(a) (ii) — (inclusive of a correction for over-depreciation);~~

~~(a)~~(b) Depreciation on the projected capital base for the year; ~~(inclusive of a correction for the inflationary gains in the projected capital base);~~

~~(iii) — (if any) increments or decrements for the year resulting from the operation of the incentive mechanism that existed in the Prior Access Arrangement; and~~

~~(c) (iv) —~~ the estimated cost of corporate income tax for the year; and

~~(b)~~(d) A forecast of operational expenditure for the year.

~~17.2. — There are no amounts included in the Total Revenue calculation for each year of the 2011 to 2015 Access Arrangement Period for the estimated cost of corporate income tax.~~

~~7.8~~17.3 ~~17.3. — The Total Revenue for each regulatory year of the 2011 to 2015 Access Arrangement Period is indicated in Table 21 included in Table 25.~~

Table 25 — Total revenue for the 2011 to 2015 access arrangement period (real \$ million: Total Revenue (Real \$m at 31 December 2010) 2015)

Year ending 31 December	2011 <u>2015</u>	2012 <u>2017</u>	2013 <u>2013</u>	2014 <u>2013</u>	2015 <u>2015</u>
Return on capital base	<u>493.280</u> 287.68	<u>497.173</u> 281.03	<u>492.622</u> 274.28	<u>487.899</u> 267.18	<u>483.143</u> 260.70
Depreciation	<u>87.790</u> 102.77	<u>92.253</u> 101.63	<u>92.619</u> 102.27	<u>92.863</u> 96.34	<u>93.167</u> 87.14
<u>Incentive mechanism Less inflationary gains on capital base</u>	<u>41.938</u> 70.09	<u>41.938</u> 70.10	<u>-70.87</u>	<u>-71.01</u>	<u>-71.57</u>
Correction for over-depreciation	<u>-32.487</u> 3.56	<u>-0.00</u>	<u>-0.00</u>	<u>-0.00</u>	<u>-0.00</u>
<u>Operating expenditure Estimated cost of corporate income tax</u>	<u>93.393</u> 26.55	<u>99.769</u> 26.13	<u>104.940</u> 26.31	<u>107.404</u> 27.25	<u>108.964</u> 28.49
<u>Total Operating expenditure</u>	<u>353.914</u> <u>109.45</u>	<u>401.133</u> <u>111.07</u>	<u>390.182</u> <u>114.05</u>	<u>388.166</u> <u>112.16</u>	<u>385.274</u> <u>114.12</u>
Total for access arrangement period	<u>1,918.655</u> 452.79	<u>1,918.655</u> 449.75	<u>1,918.655</u> 446.05	<u>1,918.655</u> 431.92	<u>1,918.655</u> 418.88

Interpretation (section 18)

18. — INTERPRETATION



17.4 ~~18.1.~~—It should be noted that the table above includes two line items used in the calculation of the Total Revenue that are not expressly identified as separate “building blocks” in NGR 76. They are:

- (a) Correction for over-depreciation – this forms part the building block of the return on the project capital base
- (b) Less inflationary gains on the capital base – this forms part of the building block of depreciation on the projected capital base.

18. DEFINITIONS

~~7.9~~18.1 Unless the context otherwise requires, terms used in capitals in this AAI have:

- (a) ~~(a)~~ the meaning given in this section ~~18~~;18;
- (b) ~~(b)~~ if no meaning is given in this section ~~18~~;18, the meaning given in the Current Access Arrangement or the Access Contract Terms and Conditions; and
- (c) ~~(c)~~ if no meaning is given in this section ~~18~~18 or in the Current Access Arrangement or the Access Contract Terms and Conditions, the meaning given in the NGA.

~~7.10~~18.2 ~~18.2~~ In this AAI:

- (a) AAI has the meaning given in ~~clause 1.1~~paragraph 1.1.
- ~~(a)~~(b) AER means the Australian Energy Regulator.
- ~~(b)~~(c) Back Haul means a Pipeline Service where the Inlet Point is downstream of the Outlet Point on the DBNGP.
- ~~(c)~~ CAPM means a model used to determine the cost of equity known as the ~~(Sharpe-Lintner) capital asset pricing model~~.
- ~~(c)~~(d) Full Haul means a ~~Gas transportation service on the DBNGP~~Pipeline Service where the receipt point is upstream of main line valve 31 on the DBNGP and the delivery point Outlet Point is downstream of Compressor Station 9 ~~on the DBNGP~~, regardless of the location of the Inlet Point, but does not include Back Haul.
- (e) Guidelines means the rate of return guidelines made and published by the ERA, in accordance with NGR 87(13), on 16 December 2013.
- ~~(d)~~(f) KPI means key performance indicator in this AAI.
- ~~(e)~~(g) Pipeline Capacity means the capacity to deliver pipeline services immediately downstream of Compressor Station 9 on the DBNGP, based on the assumptions outlined in paragraph 0.
- (h) Prior Access Arrangement Information has the meaning given to it in paragraph 1.2 of this AAI.
- ~~(f)~~(i) Prior Access Arrangement Period means the period to which the Prior Access Arrangement applied as indicated in Table 4 of this AAI.
- ~~(g)~~(j) Rate of Return means the Allowed Rate of Return and for the purpose of the Access Arrangement Period, is the rate, identified in ~~clause 11.2~~the last row of Table 20 of this AAI, required for the purposes of establishing the Total Revenue and as determined under ~~Rule~~NGR 87 of the NGR.
- ~~(h)~~(k) Reference Tariff means ~~at~~the reference tariff for ~~each~~ Reference Service and as outlined in the Current Access Arrangement, and as varied in accordance with the Current Access Arrangement.
- ~~(i)~~(l) Total Revenue means the total revenue as determined for each regulatory year of the Access Arrangement Period by applying the formula in ~~Rule~~NGR 76 of the NGR.
- (m) WACC means the weighted average cost of capital approach, adopting the formula in paragraph 13.5(b).