

Framework and approach for Western Power's fifth access arrangement review

Scoping paper

5 November 2020

Economic Regulation Authority

WESTERN AUSTRALIA

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Invitation to make submissions

Submissions are due by 4:00 pm WST, Friday, 4 December 2020.

On 18 September 2020, the *Electricity Networks Access Code 2004* was amended to support the delivery of the State Government's Energy Transformation Strategy. As a result of the amendments, the ERA is required to develop a framework and approach and new guidelines that will apply for Western Power's fifth access arrangement review.

The ERA is now seeking views from stakeholders on matters that should be considered in the development of an issues paper on the framework and approach and new guidelines, which the ERA must publish as part of the process.

We would prefer to receive your comments via our online submission form <https://www.erawa.com.au/consultation>

You can also send comments through:

Email: publicsubmissions@erawa.com.au
Post: PO Box 8469, PERTH BC WA 6849

Please note that submissions provided electronically do not need to be provided separately in hard copy.

All submissions will be made available on our website unless arrangements are made in advance between the author and the ERA. This is because it is preferable that all submissions be publicly available to facilitate an informed and transparent consultative process. Parties wishing to submit confidential information are requested to contact us at info@erawa.com.au.

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1. Background

Western Power's transmission and distribution network is a covered network under the *Electricity Networks Access Code 2004*. Western Power is required to have an approved access arrangement that sets out the terms and conditions, including prices, for third parties seeking access to the network.

Western Power's access arrangement was first approved by the ERA in April 2007 to cover the access arrangement period from 2006/07 to 2008/09 (AA1). There have been three subsequent revisions to the access arrangement approved, most recently for the period 2017/18 to 2021/22 (AA4). The current access arrangement will continue to apply until the ERA approves proposed revisions for the fifth access arrangement period from 2022/23 to 2026/27 (AA5).

On 18 September 2020, the *Electricity Networks Access Code 2004* was amended to support the delivery of the State Government's Energy Transformation Strategy.¹ The amendments to the Access Code seek to achieve the following outcomes:

- **Increasing opportunities for new technologies** through changes to the New Facilities Investment Test (NFIT), introducing non-network solution obligations, facilitating the deployment of stand-alone power systems and distribution connected storage, introducing "multi-function assets", streamlining the regulatory approach for the Whole of System priority projects, and amending the Technical Rules change management process.
- **Maximising network utilisation** through changes to the Access Code objective, ensuring end-use customers receive appropriate price signals, enabling cost recovery for Advanced Metering Infrastructure (AMI), improving access to the Western Power network and enabling cost recovery for constraint-related functions.
- **Improving the access arrangement process** through the introduction of a Framework and Approach process and providing flexibility in the access arrangement timeframes.²

As a result of the amendments, the process and some of the regulatory requirements for the AA5 review have changed.

In particular, the ERA is required to publish a framework and approach document prior to Western Power submitting its access arrangement proposal for AA5 in February 2022. This framework and approach must be finalised by 2 August 2021 and will set out the services that will be regulated through the access arrangement and the broad nature of regulatory arrangements. It is intended to facilitate early public consultation on the access arrangement and will assist Western Power to prepare its proposal.

The ERA is also required to develop and publish four new guidelines on valuing net benefits, new facilities investment test determinations, multi-function assets and a demand management innovation allowance mechanism. To ensure consistency and streamline the consultation process, the ERA will develop the new guidelines together with the framework and approach.

¹ On 6 March 2019, the Minister for Energy announced the Energy Transformation Strategy which is the State Government's strategy to respond to the technological change and evolving consumer preferences that are rapidly transforming the energy sector and to plan for the future of the power system. The delivery of the Strategy is being overseen by the Energy Transformation Taskforce which is supported by the Energy Transformation Implementation Unit, a dedicated unit within Energy Policy WA.

² Energy Transformation Taskforce, *Energy Transformation Strategy – Proposed Changes to the Electricity Networks Access Code 2004 – Stakeholder Submissions Summary*, 2 September 2020, p.1.

The ERA will publish an issues paper in early 2021. It is then required to consult on a draft framework and approach and guidelines prior to publishing the final documents by 2 August 2021.

Establishing an effective framework and approach and guidelines is an important step to ensure Western Power's fifth access arrangement can accommodate industry, market and regulatory changes to provide the network services required by users. The ERA has published this paper to inform stakeholders of the process it must follow to develop the framework and approach and to seek preliminary views on matters that should be considered in the development of the issues paper.

Further details on the framework and approach, new guidelines and the access arrangement review process are set out in this scoping paper.

2. Purpose of the framework and approach

The electricity sector in Western Australia is experiencing a major transformation due to the rapid uptake of rooftop solar panels and increasing levels of large-scale renewable generators. Advances in battery storage, distributed energy technologies and evolving consumer preferences are significantly changing the dynamics of the power system and the demands on the electricity network. Forecasting future demand is becoming increasingly challenging with many uncertainties, including the future uptake of electric vehicles.

The State Government has made changes to the Access Code that are intended to increase opportunities for new technologies and maximise the use of the existing Western Power network. A summary of these changes and the reasons they have been made can be found in the stakeholder submissions summary published by the Energy Transformation Taskforce.³

The changes include amending the Access Code objective to specifically refer to the long-term interests of consumers and the reliability and security of electricity supply. The objective has also been broadened to include consideration of the environmental implications of the supply of electricity, which is a significant change from previous requirements that only considered economic consequences.

Other changes made as part of the State Government's Energy Transformation Strategy will also affect Western Power's network and its role. These include:

- The Whole of System Plan that is seeking to better co-ordinate network and generation planning.
- The Distributed Energy Resource Roadmap that is seeking to facilitate the full capabilities of distributed energy to provide benefits and value to all customers while ensuring a safe and reliable power system.
- The new wholesale energy market design based on security constrained economic dispatch of generation and new markets for essential services to support power system security.

The network will need to adapt to meet these industry, market and regulatory changes. Western Power's future access arrangements will be crucial to ensuring the network operates effectively in the changing environment, including supporting the new market arrangements and providing users with the networks services they require.

The rate of transformation in the electricity sector combined with the introduction of new regulatory requirements will make the next access arrangement review particularly complex. Consultation with stakeholders will be crucial to ensure issues are properly considered and regulatory decisions are in the long-term interests of consumers.

The new framework and approach process will provide greater opportunity for stakeholder consultation.

Given the complexities described above, the ERA is seeking views from stakeholders on matters they consider should be included in the issues paper. This could include matters in the current access arrangement that need to be reviewed and/or new matters arising from changes in the industry and regulatory environment.

³ Energy Transformation Taskforce, *Energy Transformation Strategy Proposed Changes to the Electricity Networks Access Code 2004 Stakeholder Submissions Summary*, 2 September 2020.

3. Requirements for framework and approach and new guidelines

The required content of the framework and approach is specified in section 4.A2 of the revised Access Code. The matters that must be included in the framework and approach are:⁴

- The investment adjustment mechanism.
- The gain sharing mechanism.
- The service standards adjustment mechanism.
- The demand management allowance.
- The form of price control that will set the target revenue.
- A list of, and classification of, services, including whether services are reference services or non-reference services. This may include the eligibility criteria for each reference service, the structure and charging parameters for each distribution reference tariff and a description of the approach to setting each distribution reference tariff
- The method for setting the service standard benchmarks for each reference service.

Additional descriptions and details of the matters that must be included in the framework and approach are set out in Appendix 1.

Under section 4.A13 of the Access Code, the ERA may include matters in the framework and approach that are not listed in section 4.A2.

The milestones and time periods for the development of the framework and approach are summarised in Table 1 below.⁵

⁴ As set out in section 4.A2 of the Access Code.

⁵ The requirements are set out in section 4.A4 to 4.A9 of the Access Code.

Table 1: Milestones for development of the first framework and approach

Issues paper	The ERA must publish an issues paper and invite submissions on the framework and approach that will apply to the next access arrangement. The issues paper must include an indicative timetable setting out the ERA's proposed timeline for the milestones for the framework and approach and access arrangement revision process that will apply to the next access arrangement review.
Public consultation	Public consultation on the issues paper must be for at least 20 business days. Section 4.A14 of the Access Code requires that any submissions proposing the introduction of a new reference service must include information that justifies and supports the basis on which the party making the submission considers the relevant reference service is likely to be sought by a significant number of customers and/or a substantial proportion of the market.
Draft framework and approach	The ERA must consider any submissions made and publish its draft decision on the framework and approach, including its reasons for making the decision.
Public consultation	Public consultation on the draft framework and approach must be for at least 20 business days.
Western Power submission	Western Power may make a submission on the draft framework and approach up to 15 business days after public consultation closes.
Final framework and approach	The ERA must publish a final framework and approach, including its reasons, by 2 August 2021.

Under section 4.A10, the framework and approach is not binding on the ERA or the service provider. However, the Access Code requires:

- 4.A11 Any proposed access arrangement or proposed revisions submitted by a service provider to the Authority must be consistent with the framework and approach that applies to it. The service provider may propose departures from the framework and approach if there has been a material change in circumstances in which case it must provide reasons for the departure.
- 4.A12 The Authority must not approve a proposed access arrangement or proposed revisions that departs from the framework and approach unless there has been a material change in circumstances, in which case it must provide reasons for the departure.

The four new guidelines the ERA is required to develop and publish are:

- Acceptable methods for valuing net benefits.
- Factors the ERA proposes to consider when determining whether expenditure meets the requirements of the new facilities investment test.
- The approach the ERA proposes to take to apply the multi-function asset principles.
- A demand management innovation allowance mechanism.

The Access Code requirements for these guidelines are included in Appendix 2.

4. Access arrangement process

The framework and approach for the next access arrangement review must be published by 2 August 2021. This provides Western Power with six months to finalise its access arrangement proposal before submitting it to the ERA on 1 February 2022.

The access arrangement must include:

- The target revenue Western Power can collect from customers.
- One or more reference services.
- A tariff structure statement and forecast annual changes for each tariff during the access arrangement period.⁶
- Service standard benchmarks for each reference service.
- Any adjustments that will be made to target revenue at the next access arrangement review.⁷
- Any trigger events that would require a review to commence earlier than planned.
- A standard access contract for each reference service.
- An applications and queuing policy (including a transfer and relocation policy).⁸
- A contributions policy.
- A multi-function asset policy.⁹

Through the Energy Transformation Strategy, the regulatory requirements for determining target revenue have been amended to include:

- Costs for the development of network constraints information incurred during AA4.
- Costs for the preparation of the initial whole of system plan incurred during AA4.
- Costs of \$115.36 million (real dollar values as at 30 June 2017) for communications equipment (such as communication access points, modems and network interface cards), information technology systems and supporting equipment and services that are required to enable advanced metering functionality to be recovered over 10 years.
- A demand management innovation allowance.

Other significant changes affecting the regulatory requirements for the access arrangement review include:

- The Code objective has been amended to remove the reference to the promotion of competition in markets upstream and downstream of the networks and instead explicitly focus on the regulation of network services being undertaken in the long-term interests of consumers in relation to three limbs, which are:
 - The price, quality, safety, reliability and security of supply of electricity.
 - The safety, reliability and security of covered networks.

⁶ This replaces the previous requirement to include a price list and pricing methods for each reference service.

⁷ Includes the investment adjustment mechanism, the gain share mechanism, the service standard adjustment mechanism, the D-factor, deferred revenue, force majeure and technical rule changes.

⁸ Previously the transfer and relocation policy was separate.

⁹ This is a new requirement.

- The environmental consequences of energy supply and consumption, including reducing greenhouse gas emissions, considering land use and biodiversity impacts, and encouraging energy efficiency and demand management.
- The definition of “network” has been expanded to include stand-alone power systems or storage works used, or to be used, as an adjunct to electricity infrastructure.

The process for the access arrangement review has also been modified. The requirement for the ERA to publish a further final decision has been removed. Western Power will now submit its price list for approval after the final decision has been published.

The specified milestones and time periods for the access arrangement review process are summarised at Table 2.

Table 2: Milestones for the access arrangement review process

	Specified times
Western Power submits proposal	1 February 2022.
ERA publishes proposal	As soon as practicable.
ERA publishes issues paper	Not specified.
ERA holds public forum	Not specified.
Public consultation closes	At least 30 business days after the issues paper is published.
Western Power may submit further access arrangement information	No later than 20 business days after the public consultation closes.
ERA publishes draft decision for public consultation	As soon as practicable.
ERA holds public predetermination conference	Within 15 days of the draft decision being published.
Western Power submits revised proposal	Within 45 business days after the draft decision is published.
Public consultation closes	At least 45 business days after the draft decision is published.
Western Power may submit further access arrangement information	No later than 20 business days after the public consultation closes.
ERA publishes final decision	No later than three months prior to the target revisions commencement date.
Western Power submits price list for first year of access arrangement	No later than 15 business days after the final decision is published.
ERA approves price list	No later than 15 business days after Western Power submits its proposed price list.
Revised access arrangement commences	Targeting 1 July 2023.

Appendix 1 Summary of matters that must be included in the framework and approach

The table below summarises the approach approved at the last access arrangement review for each of the matters that must be included in the framework and approach. The table also provides details of relevant changes to the Access Code since the last access arrangement review.

	Approach approved at the last access arrangement review	Relevant changes to the Access Code since the last access arrangement review
Investment adjustment mechanism	<ul style="list-style-type: none"> An adjustment is made to target revenue in the next access arrangement period that corrects for any economic loss or gain due to differences in forecast and actual capital expenditure in the previous access arrangement period, taking into account inflation and the time value of money. Applies only to new facilities investment arising from connections of new generation capacity or new load, or augmentations to provide additional capacity for covered services and the state underground power program. 	<ul style="list-style-type: none"> No change.
Gain sharing mechanism	<ul style="list-style-type: none"> An adjustment is made to target revenue in the next access arrangement period that allows Western Power to retain the benefit of operating cost efficiencies for five years, regardless of the year that the efficiency was achieved. The adjustment can be reduced if Western Power does not meet its service standard benchmarks. 	<ul style="list-style-type: none"> Specifies that the adjustment to target revenue in the next access arrangement period can be positive or negative. The provision to reduce the adjustment if Western Power does not meet its service standard benchmarks has been removed.
Service standard adjustment mechanism	<ul style="list-style-type: none"> An adjustment is made to target revenue in the next access arrangement period to provide a financial reward or penalty for Western Power's actual performance against its service standard targets. 	<ul style="list-style-type: none"> No change.
Demand management innovation allowance mechanism	<ul style="list-style-type: none"> Not applicable. 	<ul style="list-style-type: none"> Includes a new annual, ex-ante allowance in the form of a fixed amount of additional revenue at the commencement of each pricing year to provide Western Power with funding for research and development in demand management projects that have the potential to reduce long term network costs.

	Approach approved at the last access arrangement review	Relevant changes to the Access Code since the last access arrangement review
Form of price control	<ul style="list-style-type: none"> Specifies the annual target revenue for each year and the formula to update the CPI, the TEC and debt risk premium each year. No adjustment for under or over recovery of revenue in previous years after 2020/21, except for the Tariff Equalisation Component. Annual forecast customer numbers, energy volumes and any other charging parameters must be consistent with the approved demand forecast. A side constraint ensures the total increase for each tariff does not exceed the average increase in tariffs by more than 2 percent. 	<ul style="list-style-type: none"> The requirement to “avoid price shocks” has been removed from the price control objectives and pricing principles. A requirement has been added to the price control objective to minimise “as far as reasonably possible, variance between expected revenue for the last pricing year in the access arrangement period and the target revenue for that last pricing year.” A requirement has been added to the pricing principles that the revenue expected to be recovered from each reference tariff must minimise distortions to the price signals for efficient usage.
List of and classification of services including whether services are reference services or non-reference services. May include the eligibility criteria for each reference service, the structure and charging parameters for each distribution reference tariff and a description of the approach to setting each distribution reference tariff.	<ul style="list-style-type: none"> The current reference services, including eligibility criteria, are set out in Appendix E of the access arrangement. Prices and pricing methods are set out in the annual Price List and Price List Information. 	<ul style="list-style-type: none"> Submissions from stakeholders for new reference services must include information which justifies and supports the basis on which the party making the submission considers the service is likely to be sought by a significant number of customers or a substantial proportion of the market. The pricing methods set out in Chapter 7 have been revised significantly and include a requirement for a tariff structure statement to be submitted with the access arrangement.
Method for setting service standard benchmarks for each reference service	<ul style="list-style-type: none"> The service standard benchmark for each reference service is specified in Appendix E of the access arrangement. The current benchmarks are set out in clauses 4 to 4.7 of the access arrangement and are based on the 97.5th (or 2.5th) percentile of the distribution of best fit using the previous five-year average of actual performance. 	<ul style="list-style-type: none"> No change.

Appendix 2 Requirements for new guidelines

The Access Code requirements for each of the new guidelines are set out below in the following order:

- methods for valuing net benefits
- new facilities investment test
- multi-function asset profit sharing
- demand innovation allowance mechanism.

Methods for valuing net benefits

The ERA must publish guidelines on acceptable methods for valuing net benefits:

- 6A.6 The *Authority* must:
- (a) make and *publish* guidelines that provide guidance as to acceptable methodologies for valuing *net benefits* by a *service provider*, which methodologies must include, but are not limited to, for the SWIS, consideration of changes in costs and benefits for participants in the *Wholesale Electricity Market*, and
 - (b) consult the public in accordance with Appendix 7 before making and *publishing* any guidelines under section 6A.6(a).
- “net benefit” means a net benefit (measured in present value terms to the extent that it is possible to do so) to those who *generate*, *transport* and *consume* electricity in (as the case may be):
- (a) the *covered network*; or
 - (b) the *covered network* and any *interconnected system*.

New facilities investment test

The ERA must publish guidelines on the factors it proposes to consider when evaluating a new facilities investment test application and must provide details in any decision on how it has applied the guidelines.

- 6.56 The *Authority* must make and *publish* guidelines that provide guidance as to the factors the *Authority* proposes to consider in making a determination under section 6.52 [the new facilities investment test] and must consult the public in accordance with Appendix 7 before making and *publishing* any guidelines under this section.
- 6.55A If the *Authority* makes a determination under section 6.52, it must provide *reasons* for its determination in its *draft decision* and *final decision*, and such *reasons* must provide detail on how the *Authority* applied the guidelines referred to in section 6.56 in making its determination.

Multi-function asset profit sharing

The ERA is required to publish multi-function asset profit sharing guidelines and the access arrangement must include a multi-function asset policy.

- 5.1 An access arrangement must:
- ...
- (m) include a *multi-function asset policy* under section 5.37.
- 5.37 A *multi-function asset policy* must:
- (a) to the extent reasonably practicable, accommodate the interests of the *service provider* and of *users* and *applicants*; and
- (b) be sufficiently detailed to enable *users* and *applicants* to understand in advance how the *multi-function asset policy* will operate; and
- (c) set out the method for determining *net incremental revenue*; and
- (d) be consistent with the *multi-function asset guidelines*.
- 6.84 If a *network asset* is used to provide *services* other than *covered services* (a “multi- function asset”), the *Authority* must, in accordance with the *multi-function asset principles*, in an *access arrangement* for an *access arrangement period*, reduce the *target revenue* for the *service provider* for a *pricing year* within that *access arrangement period* by an amount equal to 30% of the *net incremental revenue*.
- 6.85 In making a decision under section 6.84, the *Authority* must have regard to the *multi-function asset policy* and the *multi-function asset guidelines*.
- 6.86 The *multi-function asset principles* are as follows:
- (a) the *service provider* should be encouraged to use assets that provide *covered services* for the provision of other kinds of *services* where that use is efficient and does not materially prejudice the provision of *covered services*;
- (b) a *multi-function asset* revenue reduction should not be dependent on the *service provider* deriving a positive commercial outcome from the use of the asset other than for *covered services*;
- (c) a *multi-function asset* revenue reduction should be applied where the use of the asset other than for *covered services* is material;
- (d) regard should be had to the manner in which costs of *multi-function assets* have been recovered or revenues of *multi-function assets* have been reduced in respect of the relevant asset in the past and the *reasons* for adopting that manner of reduction; and
- (e) any reduction effected under section 6.84 should be compatible with other incentives provided under this Code.
- 6.87 For the purpose of section 6.86(c), the use of a *multi-function asset* other than for *covered services* is material if the *net incremental revenue* derived from the use of all *multi-function assets* in a *pricing year* is greater than \$1 million (*CPI adjusted*).
- 6.88 The *Authority* must make and *publish* guidelines setting out the approach the *Authority* proposes to take in applying the *multi-function asset principles* (which may include a methodology that the *Authority* proposes to use to determine reductions for the purposes of section 6.84) and must consult the public in accordance with Appendix 7 before making and *publishing* the *multi-function asset guidelines*.

Relevant definitions include:

“**net incremental revenue**” means, in relation to a *multi-function asset*, the revenue from all payments received by a *service provider* in excess of the revenue it would receive if the asset only provided *covered services*, for a *pricing year*.

“covered service” means a *service* provided by means of a covered network, including:

- (a) a *connection service*; or
- (b) an *entry service* or exit service; or
- (c) a network use of system service; or
- (d) a common service; or
- (e) a service ancillary to a service listed in paragraphs (a) to (d) above, but does not include an *excluded service*.

“services” and **“service”** mean –

- (a) the conveyance of electricity and other *services* provided by means of *network infrastructure facilities*; and
- (b) services ancillary to such services.

“excluded service” means a *service* provided by means of a *covered network* including:

- (a) a *connection service*; or
- (b) an *entry service* or *exit service*; or
 - a. a network use of system service; or
- (c) a *common service*; or
- (d) a service ancillary to the *services* listed in paragraphs (a) to (d) above, which meets the following criteria:
- (e) the supply of the service is subject to effective competition; and
- (f) the cost of the service is able to be excluded from consideration for *price control* purposes without departing from the *Code objective*.

“network infrastructure facilities” –

- (a) means electricity infrastructure used, or to be used, for the purpose of transporting electricity from generators of electricity to other electricity infrastructure or to end users of electricity; and
- (b) includes stand-alone power systems, or storage works, used, or to be used, as an adjunct to electricity infrastructure.

Demand management innovation allowance

The ERA is required to publish demand management innovation allowance guidelines and approve a demand management innovation allowance mechanism in the access arrangement. The framework and approach must include the demand management innovation allowance that will apply.

- 6.32A An access arrangement must contain a demand management innovation allowance mechanism.
- 6.32B The demand management innovation allowance is an annual, ex-ante allowance provided to service providers in the form of a fixed amount of additional revenue at the commencement of each pricing year of an access arrangement period.
- 6.32C The objective of the demand management innovation allowance mechanism is to provide service providers with funding for research and development in demand management projects that have the potential to reduce long term network costs (**“demand management innovation allowance objective”**).

- 6.32D The Authority must make and publish guidelines which must include a demand management innovation allowance mechanism consistent with the demand management innovation allowance objective and the information specified in section 6.32J.
- 6.32E The Authority must determine the maximum amount of the allowance under the demand management innovation allowance mechanism for an access arrangement period, which must be calculated for each pricing year in the access arrangement period.
- 6.32F Any amount of allowance not used by the service provider or not approved by the Authority over the access arrangement period must not be carried over into the subsequent access arrangement period or reduce the amount of the allowance for the subsequent access arrangement period.
- 6.32G In developing and applying any demand management innovation allowance mechanism, the Authority must take into account the following:
- (a) the mechanism should be applied in a manner that contributes to the achievement of the demand management innovation allowance objective;
 - (b) projects the subject of the allowance should:
 - (i) have the potential to reduce long term network costs; and
 - (ii) be innovative and not otherwise efficient and prudent alternative options that a service provider should have provided for in its proposed access arrangement; and
 - (iii) comply with the demand management innovation allowance guidelines.
 - (c) the level of the allowance:
 - (i) should be reasonable, considering the long term benefit to consumers; and
 - (ii) should only provide funding that is not available from any other source; and
 - (iii) may vary over time; and
 - (d) the allowance may fund projects which occur over a period longer than an access arrangement period.
- 6.32H A service provider must submit a compliance report to the Authority in accordance with the demand management innovation allowance guidelines.
- 6.32I The Authority must publish the compliance report.
- 6.32J The demand management innovation allowance guidelines must include the following:
- (a) the eligibility criteria to be applied by the Authority in determining whether a project is entitled to receive the allowance;
 - (b) the process, manner and form by which a service provider may apply to the Authority for up-front consideration of a project;
 - (c) the information required to be included in a compliance report which must include:
 - (i) the amount of the allowance:
 - A. incurred by the service provider to date as at the end of that pricing year;
 - B. incurred by the service provider in that pricing year; and

- C. expected to be incurred by the service provider in total over the duration of the eligible project;
 - (ii) a list and description of each project on which the allowance was spent;
 - (iii) a summary of how and why each project complies with the eligibility criteria;
 - (iv) the results of each project; and
 - (e) any requirements for the preparation, lodgement and form of a compliance report.
- 6.32K The Authority must consult the public in accordance with Appendix 7 before making and publishing the demand management innovation allowance guidelines.