

# **Pricing Methodology**

For Delivery Prices, effective as at 1 April 2017

Pursuant to the requirements of clause 2.4 of the Electricity Information Disclosure Determination 2012 – (consolidated in 2015)

### **Certification for Year-beginning Disclosures**

Pursuant to Schedule 17 Clause 2.9.1 of section 2.9 Electricity Distribution Information Disclosure Determination 2012 – (consolidated in 2015)

We, Stephen Richard Thompson and Alister John France, being directors of Alpine Energy Limited certify that, having made all reasonable enquiry, to the best of our knowledge:

- a) The following attached information of Alpine Energy's prepared for the purposes of clauses 2.4.1 of the Electricity Distribution Information Disclosure Determination
   2012 in all material respects complies with that determination.
- b) The prospective financial or non-financial information included in the attached information has been measured on a basis consistent with regulatory requirements or recognised industry standards.

CKShp

Stephen Richard Thompson 21 February 2017

Alister John France 21 February 2017

## **Table of contents**

| 1.    | Purpose of our pricing methodology                |
|-------|---|
| 2.    | Overview of our Pricing Methodology5              |
| 3.    | Our total required revenue7                       |
| 4.    | Our load groups9                                  |
| 5.    | Allocation of revenue requirement13               |
| 6.    | Calculating our prices                            |
| 7.    | Changes in delivery prices21                      |
| 8.    | Capital contributions21                           |
| 9.    | Direct billed customers22                         |
| 10.   | Distributed generation on our network25           |
| 11.   | Calculation of loss factors25                     |
| 12.   | Overview of our consumer survey26                 |
| 13.   | Rollout of smart meters27                         |
| 14.   | How we align with the pricing principles27        |
| 15.   | Our pricing strategy27                            |
| Pleas | e contact us27                                    |
| Appe  | ndix A—How we align with the pricing principles28 |
| Attac | hment A—2017 delivery prices33                    |
| Attac | hment B—2016 delivery prices35                    |
| Gloss | ary37   |

## **1.** Purpose of our pricing methodology

This pricing methodology outlines our approach to setting delivery prices effective from 1 April 2017.

### The meaning of delivery prices

The term 'delivery charge' describes the total price we charge to transport electricity from the national grid to consumer homes and businesses.

Delivery prices include our distribution charges, Transpower's transmission charges plus other charges such as rates, levies and wash-up charges (known as pass through and recoverable costs) that we must pay throughout the year.

Definitions of these charges are provided in the Glossary on page 37.

### Our network

We are an electricity distribution business (EDB) located in the South Canterbury region of New Zealand. Our electricity network has a regulatory value of \$166.9 million as at August 2016.

Our network connects over 31,900 consumers to the national transmission network through seven local grid exit points (GXPs): Bells Pond, Temuka, Timaru, Studholme, Albury, Tekapo, and Twizel. Figure 1 on page 4 shows the location of the seven GXPs and substations on our network.

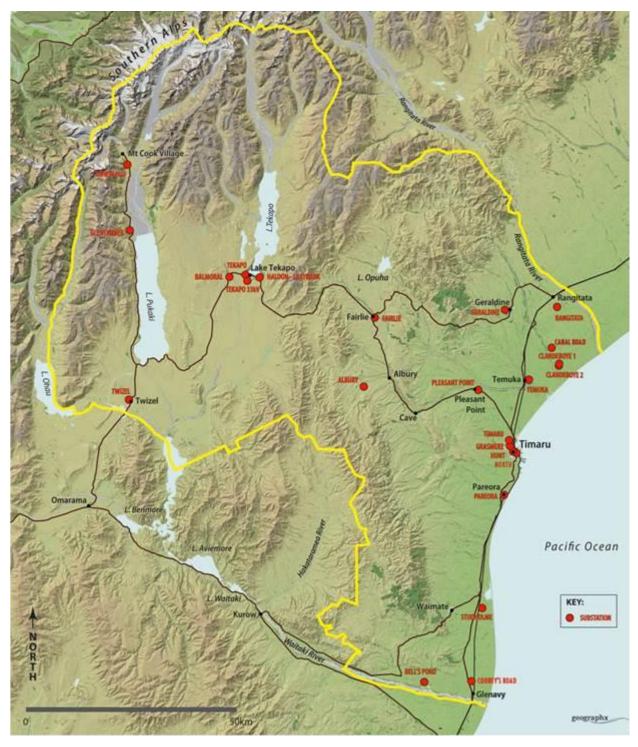
### We are owned by the community we serve

We are 100% owned by the South Canterbury community through our shareholders.

- Timaru District Council (47.5%)
- LineTrust South Canterbury (40%)
- Waimate District Council (7.54%)
- Mackenzie District Council (4.96%).

Since many of our consumers are also rate payers to the local councils, they benefit directly from our revenue, through an annual dividend payment and indirectly, though services provided by local councils.

#### Figure 1: Map of our network



### Our pricing is regulated

In 2017, we are subject to the following regulations enforced by the:

- Commerce Commission, under Part 4 of the Commerce Act 1986 (Part 4):
  - *Electricity Distribution Services Default Price–Quality Determination 2015, [2014] NZCC 33, 28 November 2014 (DPP Determination)*

- The Commerce Commission's *Electricity Distribution Information Disclosure Determination 2012 – (consolidated in 2015),* 24 March 2015 (IDD2015)
- Electricity Authority under:
  - the *Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations 2004* (the low fixed charge regulations)
  - Part 6 of the *Electricity Industry Participation Code 2010* (the Code), relating to the pricing of distributed generation.

This pricing methodology meets the obligations of these regulations. More detailed discussion of how we meet the Electricity Authority's pricing principles can be found at Appendix A—How we align with the pricing principles on page 28.

## 2. Overview of our Pricing Methodology

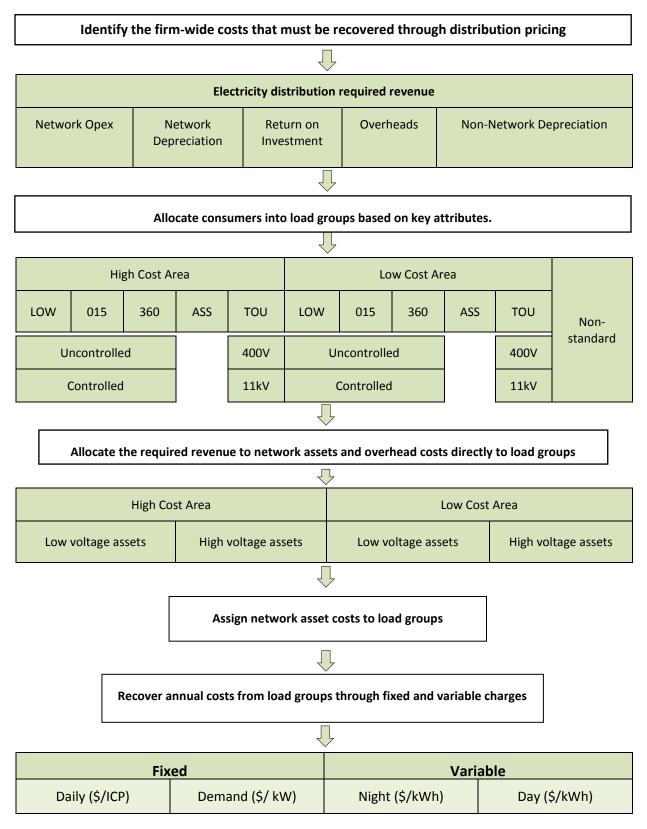
We set annual delivery prices to ensure we efficiently recover our network related long and short run costs from those who use the network. We do so by taking into account the need to balance complexity with transparency.

When setting delivery prices each year we first calculate distribution prices to recover the distribution portion of the required revenue, before calculating transmission and pass through pricing. When calculating distribution prices we use a five step process.

- 1. Identify the annual required revenue by quantifying the key cost components.
- 2. Determine the key attributes of each load group and assign consumers into load groups for the purposes of allocating costs.
- 3. Allocate the revenue required to network assets using appropriate cost drivers, and overhead costs directly to load groups.
- 4. Assign network assets to load groups and allocate respective asset costs to each load group.
- 5. Recover annual costs from load groups through fixed and variable charges.

Our five steps are described further in Figure 2 on page 6, which shows our approach to recovering distribution prices. We use a similar but simplified approach to recovering pass through and recoverable costs as well as our transmission costs.

#### Figure 2: Key steps to recovering distribution costs



## 3. Our total required revenue

Our total required revenue recovers annual distribution, transmission and pass through costs, shown in Table 1 below.<sup>1</sup>

Table 1: Revenue requirement 2017/18

| Network related costs                              | In \$'000 |
|--|-----------|
| Operating expenditure                              | 18,550    |
| Regulatory tax                                     | 2,362     |
| Depreciation                                       | 10,135    |
| Return on capital                                  | 10,996    |
| Recovery of revenue forgone from RCP1 <sup>2</sup> | 5,288     |
| Pass-through costs—i.e., rates and levies          | 372       |
| Transmission                                       | 15,469    |
| Impact of price cap                                | -1,650    |
| Total revenue requirement                          | 61,522    |

### Revenue requirement for distribution services

Our 2017/18 distribution revenue requirement recovers annual regulated network costs for the period 1 April 2017 to 31 Match 2018 and includes:

- operating expenditure
- depreciation
- return on investment.

#### Depreciation

Depreciation is calculated on a straight-line basis in accordance with information disclosure guidelines using a standard life for the asset<sup>3</sup>. Depreciation costs for 2017/18 are forecast using historical depreciation on our regulatory asset base (RAB) sourced from schedule 4 of the 2016 Information Disclosures (IDs)<sup>4</sup>.

<sup>&</sup>lt;sup>1</sup> Please note the forecast business costs are in 2015/16 dollar terms when prices are set.

<sup>&</sup>lt;sup>2</sup> Regulatory control period 1(RCP1) was for the period 1 April 2010 to 31 March 2015.

<sup>&</sup>lt;sup>3</sup> Standard lives for each asset group is determined by the Commerce Commission, *Handbook of Optimised Deprival Valuation of System Fixed Assets of electricity Lines Businesses*, 30 August 2004, table A.1, page 33.

<sup>&</sup>lt;sup>4</sup> Found at <u>http://www.alpineenergy.co.nz/disclosures</u>

#### Operating expenditure

Operating expenditure (Opex) are costs incurred through our everyday operations related to the provision of electricity distribution services. The two main costs components are:

- maintenance on network assets including related non network overhead
- quality of service.

Forecast maintenance costs for 2017/18 are derived from our 10 year network Opex budget, found in schedule 11b of the 2016 IDs.

For 2017, we have used a smoothed forecast for non-network expenditure calculated from the 10 year non-network expenditure budget. This has been done to reduce the impact of step changes in ICT expenditure due to one off projects, now and over the next few years. Step changes in costs can have a material impact on load groups with low ICP numbers.

#### Revaluations of the regulatory asset base

Our RAB is revalued upwards each year by inflation. The change in our RAB is reflected in our return on capital calculations discussed below.

#### Return on investment

Our return on investment has been calculated using the regulated weighted average cost of capital (WACC) on a forecast 2017/18 value for network RAB. A vanilla WACC (67<sup>th</sup> percentile) of 7.19% has been applied.

Our RAB, as at 31 March 2016, is approximately \$166.9 million. This is an increase of approximately \$0.6 million when compared to the value of our RAB in the prior year.

#### **Regulatory Tax**

We recover regulatory tax through our distribution charges. The 2017/18 forecast regulatory tax value is calculated using data from schedule 5a of the 2016 IDs<sup>5</sup>.

### Required revenue for pass-through and recoverable costs

Pass through and recoverable costs include:

- rates
- Commerce Commission levies and other industry levies
- claw back and wash-up allowance<sup>6</sup>.

<sup>&</sup>lt;sup>5</sup> Available on our website, <u>www.aplineenergy.co.nz</u>

<sup>&</sup>lt;sup>6</sup> Please refer to Schedule 5C and 5D respectively of the DPP Determination.

• Each year we receive notification from the Commerce Commission, Electricity Authority, and from local authorities of charges that will apply to us in the following year. We use these notifications to calculate prices for each load group to recover these costs.

### Required revenue for transmission costs

Each year prior to setting our distribution prices we receive next year's transmission pricing from Transpower for each GXP on our network. We use these to calculate transmission prices for each load group.

# The pass through balance from 2016 is used to reduce 2017 delivery prices

In the 2016 pricing year we over recovered \$867,231 of pass through and recoverable costs from consumers. In the 2017 pricing year we have refunded this amount through lower delivery prices in accordance with the default price path regulation<sup>7</sup>.

The 2016 pass through balance occurred due to conservative quantities being used to calculate our pass through balance. By using conservative quantities we recovered more revenue through our pass through and recoverable cost charges than we needed to.

For 2017 we have reduced transmission prices by \$698,635, and pass through costs by the remainder of the 2016 pass through balance of \$168,597. Thereby we have returned our over recovery to consumers through delivery prices.

## 4. Our load groups

#### Standard consumers

Our 'standard consumers' are those consumers that can be assigned to one of our 13 load groups (shown at Table 2) who have a supply contract with a retailer, and do not have an individual supply agreement with us.

We supply our standard consumers under our use of system agreements we have with electricity retailers. Our current agreement takes into account the Electricity Authority's principles taken from its Model Use of System Agreement, published in 2003.

<sup>&</sup>lt;sup>7</sup> Please refer to clause 8.6(b)(ii) of the Commerce Act (Electricity Distribution Default Price-Quality Path) Determination 2015

The majority of the consumers on our network are standard consumers.

#### Allocating standard consumers into load groups

We have 13 load groups as shown in Table 2 on page 12. Consumers are assigned to a load group based on:

- i) location in the high cost area (HCA) or low cost area (LCA)
- ii) fuse size at the individual connection point (ICP)
- iii) maximum business day peak demand
- iv) meter type—for example, half hour metering is mandatory for consumers within the time of use group (TOU) load group.

#### High Cost and Low Cost area allocation

For standard consumers the revenue requirement is allocated to HCA and LCA, using our geographic information system (GIS). The cost areas represent the number of consumers:

- i) on each transformer
- ii) per kilometre of distribution line length.

As a general rule LCA density, in ICPs per transformers, is 13 times greater than HCA density.

Allocation of consumers to load groups within cost areas

Consumers in the HCA and the LCA are split into the following load groups:

- low fixed charge groups
- mass market installed capacity groups:
  - 015-(0-15 kVA single phase 60 A connection)
  - 360—(45 kVA three phase 60 A connection)
- assessed demand groups based on fuse size
- TOU groups for LV and 11kV connections with half hour metering.

#### Low Fixed Charge load group

We must comply with the Electricity (Low Fixed Charge Tariff Option for Domestic Consumers) Regulations 2004, which state that we must offer a fixed tariff for 'domestic' consumers of no more than \$0.15 per day. A domestic consumer is defined by the regulations as a person who purchases electricity for their 'principal place of residence' (clause 4(1)).

We fulfil Low fixed charge obligations by offering the Low user load groups, that pay a daily fixed price of \$0.15. We also ensure that an 'average' consumer in the Low load groups pays no more than an 'average' consumer in an alternate 015 load group, by adjusting the

costs allocated to the Low user load groups. However in order to comply with regulations some cross subsidisation of Low user groups by other groups does occur.

Note, the regulations define 'average' as a consumer who consumes 9000 kWh annually.

015, 360, and Assessed demand load groups

ICPs not in the Low fixed charge load groups and without half hour, time of use (TOU) meters<sup>8</sup> installed, fall into one of three load groups:

- 1. 15 kVA; (015 load group)
- 2. 3 x 60 A;(360 load group)
- 3. Assessed demand (ASS load groups).

ICPs in the 015 load group are single phase and have a maximum capacity of 15 kVA (60 A), although we may also allow a 3x32 A connection on a case by case basis. ICPs in the 360 load groups are connected with three phase 60 A connections. Assessed load groups have a maximum capacity per phase greater than 60 A. This can include two phase connections also. Demand charges for consumers in the ASS load groups are calculated on the fuse size of the connection.

#### Time of Use load groups

ICPs in the TOU load groups have TOU meters installed which record kWh consumption every half an hour. From TOU meters we can calculate the after diversity maximum demand (ADMD), and coincident (network) peak demand (CPD), which are used to allocate costs to load groups, and calculate demand charges.

<sup>&</sup>lt;sup>8</sup> Some ICPs in the assessed load groups may have half hour metering installed but choose to remain in the assessed group.

| Load Group | Description   |
|------------|---|
| LOWHCA     | Domestic consumers <sup>9</sup> that consume less than 9,000 kWh per annum – high cost area |
| LOWLCA     | Domestic consumers that consume less than 9,000 kWh per annum – low cost area               |
| 015HCA     | 0-15kVA and up to 60 Amp fuse – high cost area  |
| 015LCA     | 0-15kVA and up to 60 Amp fuse – low cost area   |
| 360HCA     | 3 x 60 Amp fuses – high cost area   |
| 360LCA     | 3 x 60 Amp fuses – low cost area  |
| ASSHCA     | Assessed demand over 15kVA – high cost area   |
| ASSLCA     | Assessed demand over 15kVA – low cost area  |
| TOU400HCA  | Time of use 400 volt supply – high cost area  |
| TOU400LCA  | Time of use 400 volt supply – low cost area   |
| TOU11HCA   | Time of use 11kV supply – high cost area  |
| TOU11LCA   | Time of use 11kV supply – low cost area   |
| IND        | Individually assessed sites   |

#### Table 2: Load groups

#### Uncontrolled load

Uncontrolled load tariffs are charged to consumers in the LOW, 015, and 360 load groups whose electrical hot water heating load we are not able or permitted to control during periods of high demand. The uncontrolled load tariff is in place to incentivise consumers to offer up controllable load. Controllable load is critical for us during supply emergencies, and to avoid further investment in network capacity.

The low user groups pay an additional variable charge of \$0.0264 cents per kWh, for both day and night variable charges, for uncontrollable load. 015 and 360 consumers pay an additional annual fixed charge of \$239.24 for uncontrollable load.

## 5. Allocation of revenue requirement

This section describes how our distribution, transmission, and pass through costs are allocated to load groups.

### Recovering annual distribution costs

Our pricing model allocates distribution costs to load groups in a way that reduces cross subsidisation between users of the network, so that those that use the assets pay for them. The model does this by using the load group's demand for power to allocate the cost of assets to load group users, as load group demand is the main cost driver of distribution costs.

We allocate network costs by the load group's ADMD for low voltage assets and a weighted demand for high voltage assets (HV). The weighted demand is made up of 90% CPD and 10% ADMD, to reflect that the majority of HV asset costs occur during peak network times.

#### Economic rationale for allocation of costs to load groups

Economic theory states that we should calculate prices using the long run marginal cost of supplying power (LRMC) to consumers. In theory, prices calculated on LRMC, will influence consumer demand for power to a level of demand that maximises economic welfare and long term benefits to consumers.

For 2017 and beyond we have forecast load group demand to create a smooth increase in demand from year to year, as well as smoothed forecasts for Opex. Smoothed forecast demand, in conjunction with forecast returns to capital, enables us to calculate prices based on the LRMC.

### LV load group allocation

LV asset costs, distribution lines and cable costs, are first allocated to HCA and LCA load groups, based on the HCA load group's ADMD for LV power to the total ADMD for LV power by all LV load groups.

For example the ADMD for LV power by HC area load groups is 78 MW and the total ADMD for LV power all load groups is 158 MW, a proportion of 49%.

LV asset costs are allocated to the HCA by multiplying the total LV asset cost by 0.49%. Some HCA assets are then multiplied by a cost differential that recognises the increased cost to service assets in high cost areas. Assets which are multiplied by a cost differential include:

- distribution lines and cables
- distribution switchgear for LV
- distribution substations

- distribution transformers
- LV lines and cables
- other network assets (including load control).

The remaining asset cost is then assigned to LCA groups.

Once LV network asset costs have been adjusted for high cost areas, network assets and their associated costs are allocated to LV load groups based on the load groups ADMD to total ADMD of all users of the asset in the relevant area (HCA or LCA). The exception is load control costs which are spread across all load groups including HV groups, on the basis that reduced transmission costs benefit all users. Load control costs are allocated by the load group's regional coincident peak demand (RCPD) to total RCPD demand for all load groups.

A portion of HV asset costs are allocated to LV load groups using a weighted demand made up of a load group's ADMD (10%) and CPD (90%) to the total weighted demand of all users of the asset. This weighting is chosen because a small portion of a HV asset costs comes from servicing anytime peak demand, while the majority of our costs occur during the network peak in summer.

#### HV load group allocation

HV assets include:

- sub-transmission
- zone substations
- distribution lines and cables
- distribution switchgear
- customer service connections.

As with the allocation of asset costs to LV load groups, the allocation of asset costs to HV load groups first involves allocating assets into HC and LC areas by using the method described above for LV load groups. HC and LC assets are then allocated to HV load groups using the load groups weighted demand (10% ADMD and 90% CPD) to the total weighted demand on the asset in either the HC or LC area.

#### Load Group statistics

Table 3 on page 16, shows ICP numbers, ADMD, weighted demand and RCPD, as at 31 March 2015, for each load group. This information is used to allocate the required distribution revenue to load groups. We use lagged quantities of two years when setting prices. This allows consistency with the default price-quality path (DPP).

### Deriving maximum demands

We receive half hour kWh data for all TOU load groups and for each GXP on our network. This data enables us to calculate ADMD and CPD for TOU groups, for the network, and a combined total for all non-TOU (non-half hour metered) load groups.

Note, we have chosen *after diversity* maximum demand as an allocator and not anytime maximum demand, because the sum of maximum ICP demands in a load group is substantially higher than the diversified maximum demand of the load group, by as much as 500%. That is, ICPs in a load group experience maximum demands at different times.

Without half hour meters at an ICP (such as smart meters), we must estimate the ADMD and CPD for non TOU load groups. For the Low and 015 groups we use data from maximum demand indicators on residential LV transformers to estimate ADMD and CPD. For ADMD we use the maximum winter demand, and for CPD we base this on the highest summer demand recorded on maximum demand indicator. For the non-TOU load groups, 360, and ASS, we allocate the remaining non-TOU ADMD and CPD portion (after removing the TOU demand and 015 and Low demand) based on name plate capacity of pumps attached and estimated demand profiles.

The maximum demands that we have used will be further refined with the installation of smart meters on all non TOU load groups.

#### Allocation of required revenue to load groups

We allocate the required revenue to load groups using cost allocators described in Table 5 on page 18. The revenue allocated to each load group for 2017/18 is shown in Table 4, on page 17.

### Pass-through and recoverable revenue requirement

Please refer to 'Calculating pass through and recoverable prices' on page 20.

### Transmission revenue requirement

Please refer to 'Calculating transmission prices' on page 20.

#### Table 3: Load group statistics as at 31 March 2016

| Load group | ICP numbers | ADMD<br>(MW) | CPD<br>(MW) | Weighted<br>demand<br>(MW) | RCPD<br>(MW) |
|------------|-------------|--------------|-------------|----------------------------|--------------|
| LOWHCA     | 1,410.00    | 2.90         | 0.37        | 0.62                       | 2.82         |
| LOWLCA     | 7,994.00    | 16.43        | 2.11        | 3.54                       | 15.99        |
| LOWUHCA    | 9.00        | 0.02         | 0.00        | 0.00                       | 0.02         |
| LOWULCA    | 22.00       | 0.05         | 0.01        | 0.01                       | 0.04         |
| 015HCA     | 5,941.00    | 12.21        | 1.57        | 2.63                       | 11.88        |
| 015LCA     | 13,533.00   | 27.81        | 3.57        | 6.00                       | 27.07        |
| 015UHCA    | 33.00       | 0.07         | 0.01        | 0.01                       | 0.07         |
| 015ULCA    | 46.00       | 0.09         | 0.01        | 0.02                       | 0.09         |
| 360HCA     | 470.00      | 5.64         | 5.96        | 5.93                       | 2.35         |
| 360LCA     | 701.00      | 8.41         | 8.89        | 8.84                       | 3.51         |
| 360UHCA    | 15.00       | 0.18         | 0.19        | 0.19                       | 0.08         |
| 360ULCA    | 10.00       | 0.12         | 0.13        | 0.13                       | 0.05         |
| ASSHCA     | 1,221.00    | 54.95        | 45.15       | 46.13                      | 6.11         |
| ASSLCA     | 366.00      | 16.47        | 13.54       | 13.83                      | 4.39         |
| TOU400HCA  | 37.00       | 4.05         | 3.44        | 3.50                       | 4.09         |
| TOU400LCA  | 106.00      | 15.05        | 12.71       | 12.95                      | 11.73        |
| TOU11HCA   | 6.00        | 5.09         | 3.29        | 3.47                       | 2.87         |
| TOU11LCA   | 4.00        | 3.45         | 2.90        | 2.96                       | 1.92         |
| Total      | 31,924      | 172.99       | 103.85      | 110.76                     | 95.08        |

| Load Group | 2016/17<br>Target<br>Revenue<br>(in millions) | 2017/18<br>Target<br>Revenue<br>(in millions) | Growth in<br>Target Revenue<br>(in millions) | Proportion of<br>Load Group<br>Target Revenue<br>to Total Target<br>Revenue |
|------------|---|---|--|---|
| LOWHCA     | \$0.64  | \$0.88  | \$0.24                                       | 1.4%  |
| LOWLCA     | \$3.85  | \$4.78  | \$0.92                                       | 7.6%  |
| LOWUHCA    | \$0.01  | \$0.01  | \$0.00                                       | 0.0%  |
| LOWULCA    | \$0.01  | \$0.02  | \$0.01                                       | 0.0%  |
| 015HCA     | \$5.63  | \$6.88  | \$1.25                                       | 10.9%   |
| 015LCA     | \$11.72                                       | \$15.32                                       | \$3.60                                       | 24.2%   |
| 015UHCA    | \$0.05  | \$0.02  | -\$0.02                                      | 0.0%  |
| 015ULCA    | \$0.05  | \$0.03  | -\$0.02                                      | 0.0%  |
| 360HCA     | \$1.39  | \$1.63  | \$0.24                                       | 2.6%  |
| 360LCA     | \$2.17  | \$2.12  | -\$0.05                                      | 3.4%  |
| 360UHCA    | \$0.05  | \$0.06  | \$0.01                                       | 0.1%  |
| 360ULCA    | \$0.02  | \$0.03  | \$0.01                                       | 0.1%  |
| ASSHCA     | \$14.83                                       | \$14.03                                       | -\$0.80                                      | 22.2%   |
| ASSLCA     | \$3.68  | \$3.57  | -\$0.11                                      | 5.6%  |
| TOU400HCA  | \$1.61  | \$1.80  | \$0.19                                       | 2.8%  |
| TOU400LCA  | \$4.12  | \$4.59  | \$0.47                                       | 7.3%  |
| TOU11HCA   | \$1.28  | \$1.38  | \$0.09                                       | 2.2%  |
| TOU11LCA   | \$0.76  | \$0.79  | \$0.03                                       | 1.3%  |
| IND        | \$5.42  | \$5.33  | -\$0.09                                      | 8.4%  |
| Total      | \$57.30                                       | \$63.26                                       | \$5.97                                       | 100%  |

#### Table 4: Allocation of revenue requirement to load groups prior to LOW user regulation reallocation

#### Table 5: Cost allocators used and rationale for selection

| Cost Component                           | Allocator               | Rationale  |  |  |
|--|-------------------------|--|--|--|
| Operating<br>expenditure                 | ADMD<br>Weighted<br>CPD | Opex is related to the consumers use of the network in terms<br>of required capacity and utilisation (demand). LV related costs<br>are allocated to load groups based on ADMD and HV related<br>costs are allocated to load groups based on weighted<br>ADMD/CPD.  |  |  |
| Recovery of revenue<br>forgone from RCP1 | ADMD<br>Weighted<br>CPD | LV related costs are allocated to load groups based on ADMD<br>and HV related costs are allocated to load groups based on<br>weighted ADMD/CPD.  |  |  |
| Revaluations and sundry income           | NA                      | Revaluations are recovered through return on investment<br>component, which takes into account the revaluation of the<br>RAB each year.  |  |  |
| Depreciation                             | ADMD<br>Weighted<br>CPD | Depreciation is compensation to our owners for the reduction<br>in asset values that occur over time. Depreciation is allocated<br>to load groups based on the load group's contribution to the<br>network and local peaks. HV related depreciation is allocated<br>to groups based on weighted ADMD/CPD, with LV related<br>depreciation allocated to groups based on ADMD. Allocating<br>costs in this manner reflects that future costs to upgrade and<br>or replace assets are driven by consumer use of the asset at<br>peak times. |  |  |
| Return on<br>investment                  | ADMD<br>Weighted<br>CPD | Our owners are compensated for investing in Alpine Energy<br>through a return on the value of the asset base. We recover<br>this value based on the structure of the RAB, where network<br>assets are planned and built around providing future capacity<br>requirements That is we recover the return on investment<br>based on load group demand. In this case we use both ADMD<br>and CPD as discussed above.   |  |  |
| Non network costs                        | Pro rata<br>basis       | Non network costs are generally not driven by consumer<br>demand for power. Therefore these costs are allocated evenly<br>amongst ICPs, with the exception of individual customers.  |  |  |

## 6. Calculating our prices

In this section we discuss how we calculate prices for distribution, transmission, and pass through components of our pricing.

### Calculating distribution prices

We use a combination of fixed and variable pricing to recover distribution costs. The advantages to using both fixed and variable charges are explained at Table 6 on page 20. Overall we find that for consumers who do not have TOU metering, a ratio of 50% fixed to 50% variable cost recovery, creates the most efficient outcomes, as LRMC based costs form around 50% of distribution required revenue. Economic theory suggests that non-LRMC based costs should be recovered through a fixed charge.

When consumers do have TOU metering, we recover approximately 60% of charges through a demand charge, and the remainder through fixed and variable charges. We are presently investigating whether we should reduce the variable component and increase the demand charge over time, as part of a broader investigation into future pricing.

### Day / night variable charges

We recover variable charges with lower night rates than day, to offer incentives for shifting load into off-peak (night) periods. Where a consumer has a TOU meter or day/night meters the actual usage is applied. Where a consumer has standard metering, consumption is split 70:30 day to night which is consistent with day / night consumption levels metered at GXPs on the network.

### Fixed daily charges

Fixed daily charges are calculated by multiplying the total load group revenue requirement by the load group's fixed to variable ratio, and then dividing the fixed portion by load group ICP numbers. With assessed and TOU load groups, the fixed portion of the revenue requirement is multiplied by a demand charge ratio to calculate the portion of costs recovered through a demand charge. The demand charge itself is calculated by dividing the total load group costs recovered from a demand charge, by the either the load group's assessed capacity (in the case of the assessed groups) or the load groups AMD (for TOU groups).

#### Low fixed charge group prices

We calculate tariffs for the LOW load groups using a four step process.

- 1. We deduct from the LOW load group revenue requirement, the total fixed charge we can recover under the Low fixed charge regulations (\$0.15 per day).
- 2. We establish the remaining revenue requirement that we need to recover for the LOW load groups through variable charges.
- 3. We then calculate the LOW day night variable prices using 'goal seek', so that the total annual price for an average consumer (consuming 9000 kWh p.a.) in the LOW

load groups, is not higher than an average consumer would pay in alternative 015 groups.

4. We allocate the excess LOW user revenue requirement that we cannot recover under regulation to remaining load groups.

 Table 6: The fixed variable cost recovery ratio

| Advantage of fixed variable ratio                      | Rationale  |
|--|--|
| Signal future cost<br>of capacity<br>upgrades          | A large fixed charge (without demand charges <sup>10</sup> ) discourages efficient use of the network as it does signal the cost of using the network at peak times. For those consumers without TOU metering a variable charge does signal the cost of using the network at peak times. |
| Recognition of cost structures                         | A large fixed cost aligns with the fact that the majority of network costs in the short run are fixed.   |
| Protecting revenue<br>from reduction in<br>consumption | Recovering revenue through fixed charges reduces the risk that revenue falls due to a reduction in consumption.  |

### Calculating pass through and recoverable prices

When calculating load group prices to recover annual pass through and recoverable costs, we use forecast rates and levies from local authorities, the Commerce Commission, and the Electricity Authority.

We allocate forecast pass through and recoverable costs to load groups, by multiplying the forecast annual pass through and recoverable cost by the number of ICPs in a load group to total ICPs on the network.

We recover a load group's forecast pass through and recoverable costs through 50% fixed charges and 50% variable charges. We do not use a demand charge to recover these costs.

### Calculating transmission prices

When calculating load group prices to recover annual transmission costs, we use Transpower's transmission costs for the 2017/18 pricing year. From the total we remove

<sup>&</sup>lt;sup>10</sup> We fix demand charges for the pricing year and therefore include demand charges as a fixed annual cost when calculating the fixed variable ratio. In this instance however we are discussing fixed charges less demand charges.

the annual transmission revenue we expect to recover from direct billed customers, before allocating the remainder to load groups.

From the remaining transmission costs, we remove the revenue we expect to receive from consumers who pay extra for not having controlled hot water. We allocate connection and new investment agreement costs to load groups using a load group's ADMD, and interconnection costs using a load group's RCPD. For load groups without half hour metering we estimate RCPD based on the upper South Island RCPD, the network and half hour RCPD, as well load group demand profiles.

We recover pass through and recoverable costs through fixed, demand, and variable (consumption) charges. For those consumers in the 015 and 360 load groups with uncontrolled hot water we add an increase to their fixed daily charge of \$0.6555. For consumers in the LOW user groups we increase their variable charges by \$0.0264 / kWh.

## 7. Changes in delivery prices

The median delivery price increase from 2016/17 to 2017/18 is 7.03%.

Our 2017/18 prices reflect the changes made to the price path under the DPP Determination.

Of greatest impact to our 2017/18 prices were the:

- i) larger than normal increase in transmission charges
- ii) smoothing of non-network expenditure charges for next 10 years to reduce step changes in prices
- iii) forecasting of load group demand based on historical trends, to reduce step changes in pricing each year.

A copy of the 2017/18 and 2016/17 pricing schedules are included at Attachment A and B of this pricing methodology.

Please note that for variable charges, 'day' is between 7am and 11pm and 'night' is between 11pm and 7am.

## 8. Capital contributions

In addition to the delivery charge revenue that we receive from our consumers we also receive capital contributions from any consumer that requires to be connected to our network or needs upgrades to their existing connection. Costs of upgrades to an existing connection can be shared where there are network benefits to the upgrade. Where the upgrade is for the sole benefit of the consumer the consumer must pay in entirety for that upgrade.

In 2015/16 we received \$5.8 million in capital contributions. We are forecasted to collect \$3.2 million in capital contributions for 2017/18.

Capital contributions cover the cost of the work carried out less rebates. If 100% of capital costs are paid by capital contributions, there should be no remaining costs to be recovered through delivery prices except ongoing maintenance costs. Without a capital contribution these extensions or upgrades would be uneconomic under standard delivery prices.

For larger builds generally over \$500,000, we will calculate the risk of the investment and use this to determine the percentage of capital contributions payable. When calculating risk we invite the investor to comment on our risk score, and resulting capital contributions.

A copy of our *New Connections and Extensions Policy* can be found on our website<sup>11</sup>.

## 9. Direct billed customers

We have six direct billed customers (10 ICPs) connected to our network at present and expect one more to contract with us over the next 12 months.

We are forecast to recover \$2.1 million in distribution charges and \$3.0 million in transmission charges for the 2017/18 year from direct billed customers.

The decision to place a new connection onto a direct billed contract is made on a case by case basis. When making this decision we take into account the:

- cost of the build
- number of new assets required
- extent of the existing network that will be used by the new connection
- capital contribution paid
- ongoing costs that will be recovered through delivery prices
- required security of supply.

# Difference between direct bill and standard agreement security standards

Customers on a direct billed contract can expect one planned outage each year and an unplanned outage of two hours every five years, plus a momentary unplanned outage every

<sup>11</sup> www.alpineenergy.co.nz

two years<sup>12</sup>. These service standards are not available to consumers on the shared distribution charges model.

For both direct billed customers and consumers on the shared network we give a minimum of four working days' notice before a planned shutdown occurs. We do not guarantee supply or offer compensation if supply is lost to any connection.

### Methodology for recovering costs from direct billed customers

The following methodology is used for calculating prices for directly billed customers<sup>13</sup>. Because we enter into long term contracts with direct billed customers we are able to negotiate outcomes which are consistent with market like arrangements.

Calculation and recovery of the cost of new assets

The capital contribution paid for new assets can reduce the ongoing delivery prices that the customer will pay.

If a capital contribution equals the total value of the new assets allocated to the customer the customer may not pay cost of capital or depreciation charges for these new assets. They will however pay for ongoing maintenance charges for these assets through their delivery prices.

If the capital contributions do not cover the full cost of the value of new assets used by the customer, then the remaining value of the asset (after capital contributions) will be used to calculate cost of capital charges, and depreciation charges. Depreciation charges are calculated on a remaining life basis, with the age of the asset taken from the Commerce Commission's Optimised Deprival Value Handbook (2004).

When calculating the return on capital charges we apply the Commerce Commission's weighted average cost of capital for the industry, and the closing regulatory value of the new asset (adjusted for inflation) from the previous year, using a midyear cash flow.

Capital contributions based on perceived risk of investment

We calculate the value of the capital contribution on the perceived risk of the investment. The perceived risk is calculated using a risk algorithm which we fill out then pass to the customer for comment. The risk algorithm calculates a percentage score which translates to the percentage of the total investment cost that should be paid as a capital contribution.

<sup>&</sup>lt;sup>12</sup> Some contracted service standards will differ for older contracts. .

<sup>&</sup>lt;sup>13</sup> For some direct billed customers the pricing methodology will differ to the one described above due to prior long term contracts in place.

For example if the risk algorithm calculates risk to be 75% then we would require a capital contribution of 75% of the total investment cost.

#### Maintenance charges payable

Maintenance charges effectively bank the cost of maintaining assets. That is, while new assets will have little maintenance after the first year of service, the maintenance charge will cover future replacement costs. However, the maintenance charge will not cover future costs to upgrade capacity.

#### Recovering the cost of existing network assets

If the customer also requires the use of existing Alpine network assets then cost of capital charges, depreciation, and maintenance charges apply for these assets.

#### Allocators for recovering costs

The portion that a customer will pay for the use of existing network assets will depend on the most relevant cost driver for that asset. For lines and cables, costs are apportioned to the customer based on the customer's line/cable length to the total line/cable lengths in the network.

For sub-stations, transformers, protection, and switchgear, costs are apportioned to the asset using the total demand or capacity<sup>14</sup> of all users of the asset including the direct billed customer, to the total demand or capacity of the asset type across the network. Costs are then apportioned to the customer according to the customer's demand or capacity to the total demand/capacity relevant to the asset.

#### Recovering the future costs of grid upgrades in capacity

Please note that our costs are fixed in the short term so that a drop in consumption will have little or no impact on our short term (annual) costs. However, a decrease in consumption over the long term can delay or prevent upgrades in network capacity due to under recovery of our required revenue.

#### Recovery of transmission costs

Transmission costs are passed through to the customer according to the customer's demand to the total demand of all users of the grid exit point (GXP) the consumer is connected to. The exception is the interconnection charge which is charged out to the consumer at the Transpower rate per kW of consumer demand during the RCPD.

<sup>&</sup>lt;sup>14</sup> The use of demand or capacity will depend on the type of asset that the cost relates to.

## **10. Distributed generation on our network**

Our network provides the means for distributed generators of all types and sizes to convey electricity to end users.

Connected to our network are approximately:

- 196 small distributed generators installed at residential or small business premises with less than 10 kW and a combined capacity of 1 MW
- one embedded generator that generates at 8 MW<sup>15</sup>.

These 196 distributed generators total some 8.3 MW of distributed generation that can flow through our network at any given time.

Fees payable by distributed generators to us are set by the Electricity Authority under the Electricity Industry Participation Code (the Code).<sup>16</sup> We neither 'pay', or 'charge', distributed generators for the electricity that they convey down our lines. Payment for distributed generation is made by retailers and the rates can be found on the respective retailer websites.

We encourage generators of solar energy (photo voltaic cells), wind, water (hydroelectric) or fossil fuels such as diesel or natural gas that have energy surplus to their requirements to sell into the network. We do this by allowing generators to use our distribution network without incurring any network charges, although in accordance with the Code, connection, inspection and livening fees still apply. This is an alternative to paying Avoided Cost of Distribution (ACOD) benefits.

ACOT payments are made by contract on a case by case basis.

Information about connection to our network and our application process for connection and operation of distributed generation by both small and large distributed generators is available at <a href="http://www.alpineenergy.co.nz/our-network/sub-menu-modid-156/40-solar-distributed-generation">http://www.alpineenergy.co.nz/our-network/sub-menu-modid-156/40-solar-distributed-generation</a>

## **11. Calculation of loss factors**

Losses represent the percentage of electricity entering the network that is lost during the delivery to ICPs. The quantity of electricity metered at ICPs is net of losses. To determine

<sup>&</sup>lt;sup>15</sup> Opuha hydro installation with maximum generation of 8 MW.

<sup>&</sup>lt;sup>16</sup> Schedule 6.5, Electricity Participation Code 2010, Part 6, Connection of distributed generation.

each retailer's purchase responsibilities, the electricity measured at the consumer's meter is multiplied by a 'loss factor'. There are two main components to loss factors:

- i) fixed component due to the standing losses of the zone substation and distribution transformers
- ii) variable components arising from the heating effects of the resistive losses in the delivery conductors.<sup>17</sup>

The loss percentage reported under the information disclosure requirements for the year ended 31 March 2016 was 1.8%.

### Losses can vary by connection

The following loss factors applied by us are as follows:

- 33kV dedicated—1.02
- 11KV general—1.05
- 400V general—1.07

Losses for 11kV consumers will be some 2% less than 400V consumers because there are no distribution transformer losses. Dedicated 33kV line, which provides N-1 security to meet reliability of supply requirements, results in effective losses of less than 2% for loads around 15MW. N-1 security refers to the ability to provide power even after the loss of one transformer.

## **12.** Overview of our consumer survey

In July 2016 we conducted a 'mass market' consumer survey of approximately 500 mass market customers, 50 irrigation customers and 30 non-food industrial processing consumers. We received completed responses in regard to views on supply reliability, inconvenience caused by interruptions, community disruption, and price.

The key message from most consumers across all market segments is that there is limited ability or desire to change the time, season, or way in which electricity is used. This translates into a limited appetite for participating in demand management, despite the possibility of reduced line charges.

At best, there are seemingly isolated market segments and industrial customers that have some willingness to have solar panels or batteries installed, but seem unwilling to alter the time of their demand or operate on-site generation.

<sup>&</sup>lt;sup>17</sup> The resistive losses are proportional to the square of the load current, and occur in all network conductors and in the zone substations and distribution transformers.

## **13. Rollout of smart meters**

We are currently rolling out smart meters across our network. These meters give real time information about consumers' half hour energy usage. Once the rollout is complete, real time information on all load groups' usage will be available.

Our current delivery prices do not reflect the information that will be available after the rollout is complete. We intend to consider how our delivery charges might be structured in a way that anticipates and enables us to use this available information.

## 14. How we align with the pricing principles

To see how we align with the Electricity Pricing Authority Pricing Principles please refer to Appendix A.

## **15. Our pricing strategy**

Our pricing strategy is to conform to regulations for every pricing period.

## Please contact us

We welcome questions about our pricing methodology. Questions can be forwarded to:

Sara Carter General Manager - Commercial and Regulatory Alpine Energy Limited 03 6874 306 sara.carter@alpineenergy.co.nz

If you have a complaint about our service please contact us on 03 687 4300. If we can't resolve your complaint, you can contact Utilities Disputes Ltd, formerly known as the Electricity and Gas Complaints Commissioner, on <u>http://www.utilitiesdisputes.co.nz</u> or on 0800 22 33 40.

### Appendix A—How we align with the pricing principles

#### Table 7: Electricity Authority Pricing Principles

| Pricing Principles Alpine Energy Limited's Alignment to the Principles   |  |  |  |  |
|--|--|--|--|--|
| (a) Prices are to signal the economic costs of service provision by:   |  |  |  |  |
| <ul> <li>(i) being subsidy free (equal to<br/>or greater than incremental<br/>costs, and less than or equal<br/>to standalone costs), except<br/>where subsidies arise from<br/>compliance with legislation<br/>and/or other regulation</li> </ul> | Cross subsidies occur where prices charged to a consumer or<br>consumer group do not recover the long run incremental<br>costs of providing the line service to them.<br>We calculate long run incremental costs as the increase in<br>consumption from an increase in \$1 of system growth capital<br>expenditure. We define standalone cost as the lowest cost<br>alternative of supplying power to each consumer group.<br>Our standalone costs are \$775/kW and our long–run<br>incremental costs (LRIC) are \$55/kW if we were to recover all<br>charges through a demand charge. Table 9 shows that the<br>forecast revenue in \$/kW per load group is equal to or greater |  |  |  |
|  | than the incremental cost and less than the standalone cost<br>for each load group; demonstrating that our prices are subsidy  |  |  |  |
|  | free.  |  |  |  |
|  | Table 9: variable distribution price per load group  |  |  |  |
|  | Load Group \$/kW   |  |  |  |
|  |  | Ψįκw   |  |  |
|  | LOWLCA   | \$246.90   |  |  |
|  | LOWLCA<br>LOWUHCA  |  |  |  |
|  |  | \$246.90   |  |  |
|  | LOWUHCA  | \$246.90<br>\$189.06   |  |  |
|  | LOWUHCA<br>LOWULCA   | \$246.90<br>\$189.06<br>\$318.03   |  |  |
|  | LOWUHCA<br>LOWULCA<br>015HCA   | \$246.90<br>\$189.06<br>\$318.03<br>\$42.09  |  |  |
|  | LOWUHCA<br>LOWULCA<br>015HCA<br>015LCA   | \$246.90<br>\$189.06<br>\$318.03<br>\$42.09<br>\$169.25  |  |  |
|  | LOWUHCA<br>LOWULCA<br>015HCA<br>015LCA<br>015UHCA  | \$246.90<br>\$189.06<br>\$318.03<br>\$42.09<br>\$169.25<br>\$140.77  |  |  |
|  | LOWUHCA<br>LOWULCA<br>015HCA<br>015LCA<br>015UHCA<br>015ULCA   | \$246.90<br>\$189.06<br>\$318.03<br>\$42.09<br>\$169.25<br>\$140.77<br>\$166.59  |  |  |
|  | LOWUHCA<br>LOWULCA<br>015HCA<br>015LCA<br>015UHCA<br>015ULCA<br>360HCA   | \$246.90<br>\$189.06<br>\$318.03<br>\$42.09<br>\$169.25<br>\$140.77<br>\$166.59<br>\$131.23  |  |  |
|  | LOWUHCA<br>LOWULCA<br>015HCA<br>015LCA<br>015UHCA<br>015ULCA<br>360HCA<br>360LCA   | \$246.90<br>\$189.06<br>\$318.03<br>\$42.09<br>\$169.25<br>\$140.77<br>\$166.59<br>\$131.23<br>\$70.26   |  |  |
|  | LOWUHCA<br>LOWULCA<br>015HCA<br>015LCA<br>015UHCA<br>015ULCA<br>360HCA<br>360LCA<br>360UHCA  | \$246.90<br>\$189.06<br>\$318.03<br>\$42.09<br>\$169.25<br>\$140.77<br>\$166.59<br>\$131.23<br>\$70.26<br>\$119.24                                     |  |  |
|  | LOWUHCA<br>LOWULCA<br>015HCA<br>015LCA<br>015UHCA<br>015ULCA<br>360HCA<br>360LCA<br>360UHCA<br>360ULCA   | \$246.90<br>\$189.06<br>\$318.03<br>\$42.09<br>\$169.25<br>\$140.77<br>\$166.59<br>\$131.23<br>\$70.26<br>\$119.24<br>\$178.48                         |  |  |
|  | LOWUHCA<br>LOWULCA<br>015HCA<br>015LCA<br>015UHCA<br>015ULCA<br>360HCA<br>360LCA<br>360UHCA<br>360ULCA<br>ASSHCA   | \$246.90<br>\$189.06<br>\$318.03<br>\$42.09<br>\$169.25<br>\$140.77<br>\$166.59<br>\$131.23<br>\$70.26<br>\$119.24<br>\$178.48<br>\$164.51             |  |  |
|  | LOWUHCA<br>LOWULCA<br>015HCA<br>015LCA<br>015UHCA<br>015ULCA<br>360HCA<br>360LCA<br>360UHCA<br>360ULCA<br>ASSHCA<br>ASSLCA   | \$246.90<br>\$189.06<br>\$318.03<br>\$42.09<br>\$169.25<br>\$140.77<br>\$166.59<br>\$131.23<br>\$70.26<br>\$119.24<br>\$178.48<br>\$164.51<br>\$130.72 |  |  |

TOU11LCA

\$105.52

| Pricing Principles  | Alpine Energy Limited's Alignment to the Principles  |
|---|--|
| <ul> <li>(ii) having regard, to the extent<br/>practicable, to the level of<br/>available service capacity</li> </ul>                                 | We use TOU pricing (including day night) and<br>capacity/demand based pricing where possible to encourage<br>consumers to use the network outside of peak periods where<br>capacity constraints may occur.   |
|   | It would be ideal to calculate available service capacity for<br>each load group. However, ICPs within load groups are<br>distributed across our seven GXPs. Meaning that ICPs in one<br>load group may be in different geographical areas. Unless we<br>move to geographic base pricing, requiring an increase in<br>complexity, reporting available service capacity is<br>problematic. At this stage we have decided to limit the<br>number of load groups to reduce complexity and transactions<br>costs on our retailers. |
| <ul> <li>(iii) signalling, to the extent</li> <li>practicable, the impact of</li> <li>additional usage on future</li> <li>investment costs</li> </ul> | As above we use TOU (including day night pricing) and<br>demand charges to encourage consumers to consume outside<br>of peak periods, in order to reduce future expenditure on the<br>network.   |
|   | For 2017 and beyond we have forecast load group demand to create a smooth increase in demand from year to year, as well as smoothed forecasts for Opex to approximate LRMC <sup>18</sup> . Previously step changes in load group demand (based on prior year data) would create material changes in prices one year to the next. By smoothing out demand and costs, costs are allocated more evenly year to year, causing an even change in load group prices.   |

<sup>&</sup>lt;sup>18</sup> Capex is expected to keep growing at historical levels each year, unlike some networks which have flat growth in Capex in the medium term with occasional one step changes in demand in the long run.

(b) Where prices based on 'efficient' incremental costs would under-recover allowed revenues, the shortfall should be made up by setting prices in a manner that has regard to consumers' demand responsiveness, to the extent practicable.

This principle encourages distributors to direct the recovery of network fixed costs towards those consumers who are less price-responsive and will therefore reduce their demand by the lowest amount. This means that we must consider how different consumer groups might respond to changes in price.

However, considering how different consumer groups might respond to change in price is very difficult for us to determine as we hold limited information about price elasticity of demand, as retailers hold information at the consumer level. Therefore we apply this principle at a principle-based level by measuring the impact of changes on price on the 'average consumer' when we set prices for standard customers.

Our prices to individual customers take into account their willingness to pay when we transact cost of supply agreements with them

| <ul> <li>Provided that prices satisfy (a) above, prices should be responsive to the requirements and<br/>circumstances of stakeholders in order to:</li> </ul> |  |  |  |  |  |
|--|--|--|--|--|--|
| (i) discourage uneconomic<br>bypass  | This principle aims to ensure that prices that enable the<br>recovery of fixed network costs do not drive any consumers to<br>an alternative solution that increases total costs to all parties<br>involved (i.e., uneconomic bypass).<br>We have calculated standalone costs for standard consumers<br>based on estimated annualised life cycle costs (\$/kWh) of<br>standalone generation. Our pricing for standard load groups<br>is below our calculated standalone cost.<br>For non-standard consumers we manage this risk through<br>long term contracts negotiated with the consumer concerned. |  |  |  |  |

| <ul> <li>(ii) allow for negotiation to<br/>better reflect the economic<br/>value of services and enable<br/>stakeholders to make<br/>price/quality trade-offs or<br/>non-standard arrangements<br/>for services</li> </ul> | This principle reflects the regulators concern that monopoly<br>service providers have few incentives to actively engage with<br>their consumers.<br>Consumer engagement should allow prices to more closely<br>resemble 'market-like' transactions where consumers have<br>the ability to communicate their expectations and preferences<br>to the regulated firm. We align with this principle through our<br>annual consumer surveys and through our engagement with<br>non-standard consumers.<br>The surveys help us to understand price quality trade-offs<br>from the consumer's perspective. That is, whether consumers<br>are willing to pay more for a higher quality service and also<br>what the impact of specific events (e.g., severe weather) had<br>on them.<br>As a result of our interactions with our non-standard<br>consumers, we understand the preferences of these<br>consumers well. The non-standard contracts are also<br>negotiated to reflect price/quality trade-offs. |
|--|---|
| (iii) where network economics  | We pay Avoided Cost of Transmission (ACOT) benefits to a  |
| warrant, and to the extent   | small number of large distributed generators on a contractual   |
| practicable, encourage   | basis. This is to encourage such generators to generate during  |
| investment in transmission   | peak transmission periods. However, we do not pay ACOT to   |
| and distribution alternatives  | small distributed generators as they make a very small  |
| (e.g., distributed generation  | contribution to avoiding transmission costs. Instead we allow   |
| or demand response) and  | generators to use our distribution network without incurring  |
| technology innovation  | network charges.  |

## (d) Development of prices should be transparent, promote price stability and certainty for stakeholders, and changes to prices should have regard to the impact on stakeholders

We are of the view that our delivery prices are understandable for stakeholders (for example, consumers, retailers, shareholders, and us). Our delivery prices have been developed in a manner that intends to promote certainty and price stability.

When we have had to increase delivery prices we have done so uniformly with due regard given to the impact on stakeholders of any changes in prices and/or transaction costs. Consumers have a reasonable expectation that our delivery prices will be stable and will not shift significantly over time. Increases to our delivery prices have been, and will continue to be, consistent with the limits placed on us under the DPP Determination by the Commerce Commission.

(e) Development of prices should have regard to the impact of transaction costs on retailers, consumers and other stakeholders and should be economically equivalent across retailers.

This principle encourages EBDs to recognise the costs that they can impose on retailers, consumers and other stakeholders and to find ways to minimise those costs. We are managing the transaction costs on retailers by discussing pricing with other EBD's in order to help with standardisation of tariffs. If tariffs are overly complex this creates costs for retailers and consumers. We are of the view that our tariffs are not overly complex and should not impose high transaction costs on retailers and consumers. We also believe that our pricing methodologies maintain economic equivalence across retailers.

The work by the Electricity Networks Authority on our behalf to standardise tariffs and nomenclature will also help in this regard.

## Attachment A—2017 delivery prices

|           |  | 2017 Delivery Charges |                |                  |                          | Number of                       |
|-----------|--|-----------------------|----------------|------------------|--------------------------|---------------------------------|
|           | 2017 Consumer groups                         | Fixed<br>per day      | Day<br>per kWh | Night<br>per kWh | Demand<br>per kW/per day | Consumers<br>as at<br>31/3/2018 |
| LOWHCA    | Low User (controlled) high cost area         | \$0.15                | \$0.11         | \$0.07           | \$0.00                   | 1,861                           |
| LOWLCA    | Low User (controlled) low cost area          | \$0.15                | \$0.11         | \$0.07           | \$0.00                   | 9,339                           |
| LOWUHCA   | Low User (uncontrolled) high cost area       | \$0.15                | \$0.14         | \$0.10           | \$0.00                   | 11                              |
| LOWULCA   | Low User (uncontrolled) low cost area        | \$0.15                | \$0.13         | \$0.09           | \$0.00                   | 37                              |
| 015HCA    | Single Phase (controlled) high cost area     | \$1.14                | \$0.07         | \$0.03           | \$0.00                   | 5,740                           |
| 015LCA    | Single Phase (controlled) low cost area      | \$1.04                | \$0.07         | \$0.03           | \$0.00                   | 12,625                          |
| 015UHCA   | Single Phase (uncontrolled) high cost area   | \$1.80                | \$0.07         | \$0.03           | \$0.00                   | 34                              |
| 015ULCA   | Single Phase (uncontrolled) low cost area    | \$1.68                | \$0.07         | \$0.03           | \$0.00                   | 54                              |
| 360HCA    | Three Phase (controlled) high cost area      | \$4.80                | \$0.07         | \$0.03           | \$0.00                   | 576                             |
| 360LCA    | Three Phase (controlled) low cost area       | \$3.61                | \$0.07         | \$0.03           | \$0.00                   | 794                             |
| 360UHCA   | Three Phase (uncontrolled) high cost area    | \$5.36                | \$0.07         | \$0.03           | \$0.00                   | 17                              |
| 360ULCA   | Three Phase (uncontrolled) low cost area     | \$4.22                | \$0.07         | \$0.03           | \$0.00                   | 14                              |
| ASSHCA    | Assessed demand high cost area               | \$1.56                | \$0.07         | \$0.03           | \$0.17                   | 1,328                           |
| ASSLCA    | Assessed demand low cost area                | \$1.01                | \$0.07         | \$0.03           | \$0.13                   | 385                             |
| TOU400HCA | Time-of-Use metering at 400 V high cost area | \$0.99                | \$0.02         | \$0.01           | \$0.45                   | 41                              |
| TOU400LCA | Time-of-Use metering at 400 V low cost area  | \$0.79                | \$0.02         | \$0.01           | \$0.37                   | 106                             |
| TOU11HCA  | Time-of-Use metering at 11 kV high cost area | \$0.98                | \$0.03         | \$0.01           | \$0.40                   | 6                               |
| TOU11LCA  | Time-of-Use metering at 11 kV low cost area  | \$0.83                | \$0.03         | \$0.01           | \$0.33                   | 4                               |

#### Notes:

**Delivery charges** include distribution and transmission charges and excludes metering charges.

**Fixed Charges** accrue daily at the rate of 1/365th of the annual amount. The Fixed Transmission charge for sites in the 015UHCA, 015ULCA, 360UHCA and 360ULCA load groups is a special charge for the provision of electric water heating that cannot be controlled by Alpine Energy via a ripple relay.

Variable Charges are made up of day unit charges which are levied in respect of all units used between 7am and 11pm and night unit charges which are levied in respect of the period 11pm to 7am. Charges are based on metering at the Grid Exit Points supplying the network with a reduction for the declared network loss level to emulate usage metered on site. The additional distribution charge of 3.54 cents/kWh for day and night usage in the LOWHCA and LOWUHCA load groups, and 3.54 cents/kWh for day and night usage in the LOWLCA and LOWUHCA load groups, and 3.54 cents/kWh for day and night usage of 2.66 cents/kWh for day and night usage for sites in the LOWUHCA and LOWULCA load groups is a Special Charge for provision of electric water heating that cannot be controlled by us via a ripple relay, and is charged based on usage advised by electricity retailers.

**Demand Charges** only apply to sites with a demand (kW) charge. The demand level at these sites is assessed and set by us and is available on request. The charge accrues daily at the rate of 1/365th of the annual amount.

All Charges are GST exclusive. GST is payable in addition to the charges. Additional terms and conditions detailed in our Use of System Agreement and Memorandum of Understanding may also apply.

### Attachment B—2016 delivery prices

|           |  | 2016 Delivery Charges |                |                  |                          | Number of                       |
|-----------|--|-----------------------|----------------|------------------|--------------------------|---------------------------------|
|           | 2016 Consumer groups                         | Fixed<br>per day      | Day<br>per kWh | Night<br>per kWh | Demand<br>per kW/per day | Consumers<br>as at<br>31/3/2017 |
| LOWHCA    | Low User (controlled) high cost area         | \$0.15                | \$0.10         | \$0.06           | \$0.00                   | 1,620                           |
| LOWLCA    | Low User (controlled) low cost area          | \$0.15                | \$0.10         | \$0.06           | \$0.00                   | 8,641                           |
| LOWUHCA   | Low User (uncontrolled) high cost area       | \$0.15                | \$0.13         | \$0.09           | \$0.00                   | 10                              |
| LOWULCA   | Low User (uncontrolled) low cost area        | \$0.15                | \$0.12         | \$0.08           | \$0.00                   | 28                              |
| 015HCA    | Single Phase (controlled) high cost area     | \$0.97                | \$0.07         | \$0.03           | \$0.00                   | 5,839                           |
| 015LCA    | Single Phase (controlled) low cost area      | \$0.87                | \$0.07         | \$0.03           | \$0.00                   | 13,071                          |
| 015UHCA   | Single Phase (uncontrolled) high cost area   | \$1.63                | \$0.07         | \$0.03           | \$0.00                   | 34                              |
| 015ULCA   | Single Phase (uncontrolled) low cost area    | \$1.52                | \$0.07         | \$0.03           | \$0.00                   | 50                              |
| 360HCA    | Three Phase (controlled) high cost area      | \$4.40                | \$0.07         | \$0.03           | \$0.00                   | 520                             |
| 360LCA    | Three Phase (controlled) low cost area       | \$3.28                | \$0.07         | \$0.03           | \$0.00                   | 746                             |
| 360UHCA   | Three Phase (uncontrolled) high cost area    | \$5.06                | \$0.07         | \$0.03           | \$0.00                   | 16                              |
| 360ULCA   | Three Phase (uncontrolled) low cost area     | \$3.94                | \$0.07         | \$0.03           | \$0.00                   | 12                              |
| ASSHCA    | Assessed demand high cost area               | \$1.50                | \$0.07         | \$0.03           | \$0.16                   | 1,273                           |
| ASSLCA    | Assessed demand low cost area                | \$0.97                | \$0.07         | \$0.03           | \$0.11                   | 375                             |
| TOU400HCA | Time-of-Use metering at 400 V high cost area | \$0.93                | \$0.02         | \$0.01           | \$0.46                   | 39                              |
| TOU400LCA | Time-of-Use metering at 400 V low cost area  | \$0.75                | \$0.02         | \$0.01           | \$0.34                   | 106                             |
| TOU11HCA  | Time-of-Use metering at 11 kV high cost area | \$0.92                | \$0.02         | \$0.01           | \$0.38                   | 6                               |
| TOU11LCA  | Time-of-Use metering at 11 kV low cost area  | \$0.82                | \$0.02         | \$0.01           | \$0.33                   | 4                               |

#### Notes:

**Delivery charges** include distribution and transmission charges and excludes metering charges.

**Fixed Charges** accrue daily at the rate of 1/366th of the annual amount. The Fixed Transmission charge for sites in the 015UHCA, 015ULCA, 360UHCA and 360ULCA load groups is a special charge for the provision of electric water heating that cannot be controlled by Alpine Energy via a ripple relay.

Variable Charges are made up of day unit charges which are levied in respect of all units used between 7am and 11pm and night unit charges which are levied in respect of the period 11pm to 7am. Charges are based on metering at the Grid Exit Points supplying the network with a reduction for the declared network loss level to emulate usage metered on site. The additional distribution charge of 3.33 cents/kWh for day and night usage in the LOWHCA and LOWUHCA load groups, and 2.90 cents/kWh for day and night usage in the LOWLCA and LOWUHCA load groups, and 2.90 cents/kWh for day and night usage of 2.64 cents/kWh for day and night usage for sites in the LOWUHCA and LOWULCA load groups is a Special Charge for provision of electric water heating that cannot be controlled by us via a ripple relay, and is charged based on usage advised by electricity retailers.

**Demand Charges** only apply to sites with a demand (kW) charge. The demand level at these sites is assessed and set by us and is available on request. The charge accrues daily at the rate of 1/366th of the annual amount.

All Charges are GST exclusive. GST is payable in addition to the charges. Additional terms and conditions detailed in our Use of System Agreement and Memorandum of Understanding may also apply.

## Glossary

| ACOD                | Avoided Costs of Distribution – A reduction in distribution costs<br>when demand for power is reduced at network peak times or<br>provided by local generation during network peak times              |
|---------------------|---|
| ΑСΟΤ                | Avoided Costs of Transmission – A reduction in transmission<br>costs when demand for power is reduced at transmission peak<br>times or provided by local generation during transmission peak<br>times |
| ADMD                | After Diversity Maximum Demand—the simultaneous<br>maximum demand of a group of consumers with similar power<br>requirements  |
| Capacity            | The maximum power supplied by a network asset. With respect<br>to consumer capacity, it refers to the size of the network assets<br>directly connected to the consumer.                               |
| Code                | The Electricity Industry Participation Code 2010  |
| Consumer            | A person that consumes electricity supplied by our network  |
| Commerce Commission | A government body tasked with regulating our price and quality of service   |
| CPD                 | Coincident Peak Demand—relates to the consumer's off-take at the connection location during a peak demand period  |
| СРІ                 | Consumer Price Index—a measure of the change of a weighted average of prices in a basket of consumer goods and services   |
| Customer            | A legal entity with which we have a direct contractual relationship, in the form of a use of supply agreement (e.g. retailers and large consumers)  |
| Delivery prices     | Prices that recover distribution, transmission, pass through and recoverable costs.   |
| Demand              | The amount of electricity required to power equipment at a point in time, expressed in kilowatts (kW) or kilovolt amperes (kVA)   |

| Distributor            | Alpine Energy Limited as the operator and owner of the electricity distribution network  |
|------------------------|--|
| Distributed Generation | Electricity generation that is connected and distributed within<br>the distribution network, the electricity generation being such<br>that it can be used to avoid or reduce transmission demand<br>costs. Also referred to as 'embedded generation' |
| Distribution costs     | Costs associated with building and maintaining our electricity network   |
| Distribution network   | The network of electricity assets that distribution network companies such as Alpine Energy own and operate, to deliver electricity from the transmission network to consumers.  |
| DPP                    | Default Price-Quality Path—with which non-exempt suppliers<br>of electricity line services comply under Part 4 of the Commerce<br>Act 1986   |
| EDB                    | Electricity Distribution Business—a business that is responsible for delivering electricity from the national grid to consumers  |
| Electricity Authority  | A government body tasked with promoting efficiency in the electricity industry and who make changes to the Electricity Industry Participation Code, which we must comply with  |
| Fixed prices           | Prices which do not vary with the amount of kWh consumed   |
| GIS                    | Geographic Information System—is used to isolate assets on a network and to identify low cost and high cost areas  |
| GXP                    | Grid Exit Point—a point of connection between Transpower's transmission system and our distribution network  |
| НСА                    | High cost area – an area of the network which has higher<br>distribution costs per ICP than the LCA due to lower ICP density   |
| High voltage           | Network assets that supply electricity at or above 11,000 V  |
| ICP                    | Installation Control Point—a point of connection on the<br>Distributor's network, which the Distributor nominates as the<br>point at which a retailer is deemed to supply electricity to a<br>consumer   |

| LCA                                   | Low cost area – an area of the network which has lower<br>distribution costs per ICP than the HCA due to higher ICP<br>density                   |
|---------------------------------------|--|
| Load group                            | A group of consumers with similar network connection characteristics such as location or capacity requirements                                   |
| Low user                              | A consumer in a Low load group   |
| Low voltage                           | Network assets that supply electricity at 400 V  |
| Long run incremental costs            | LRIC The increase in cost from an increase in network capacity that has occurred over a period of time long enough for all costs to be variable. |
| Mass market                           | The majority of electricity consumers, predominantly residential and small business  |
| Network asset                         | An asset that is primarily used to transport electricity between<br>the national transmission grid and local consumers of electricity            |
| Part 4                                | Part 4 of the Commerce Act 1986 governing the regulation of EDBs as administered by the Commerce Commission                                      |
| Pass through and<br>recoverable costs | Costs which are charged to Alpine Energy which are then 'passed through' consumers. Costs include:   |
|                                       | <ul> <li>rates</li> <li>commerce commission levies and other industry levies</li> <li>transmission costs</li> </ul>                              |
| Pricing Principles                    | Guidelines published by the Electricity Authority that specify the information that a Distributor should make available                          |

| RAB                 | Regulatory Asset Base - The value our network assets would<br>have in a competitive market if this existed, as determined by<br>the Commerce Commission  |
|---------------------|--|
| RCPD                | Regional Coincident Peak Demand —relates to the consumer's off-take at the connection location during a regional peak demand period  |
| Required revenue    | The revenue we require to cover the annual costs of providing electricity distribution services  |
| του                 | Time Of Use—is a consumer that is metered according to their<br>electricity consumption for a particular period (usually half-<br>hourly) allowing pricing that varies depending on time of day<br>and measurement of peak demands |
| Transmission costs  | The cost of maintaining the national electricity grid.<br>Transmission costs are charged to distribution companies who<br>recover these costs from users of the network through delivery<br>prices                                 |
| Uncontrollable Load | The load that we are not able to control i.e., switch off during periods of high demand such as electrical water heating   |
| Vanilla WACC        | Weighted average of the pre-corporate tax cost of debt and the cost of equity  |
| Variable prices     | Prices which vary with the amount of kWh consumed  |
| WACC                | Weighted Average Cost of Capital—is the regulated rate of return on the company's assets.  |