

DER and network regulation

AER

6 March 2019

Our presentation

- Overall thoughts
- Our experience of the energy transformation
- What does that mean for incentives?
- What have we been doing to promote efficient expenditure
- Totex pros and cons

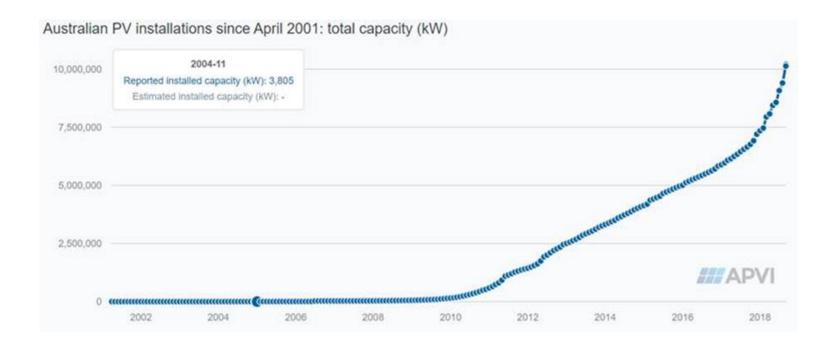
Overall thoughts

 Efficient integration of DER into network regulation creates a range of opportunities and challenges, importantly noting that these challenges and the opportunities won't necessarily be uniform between regions



Our experience of the energy transformation

• DER penetration has been under way for a number of years. To date, it has not been a big driver of capex.



Our experience of the energy transformation

 Capex proposals coming to us now show an increasing focus on responding to solar-PV penetration: monitoring and addressing constraints

There are potentially major demand drivers on the horizon (e.g. electric vehicles)

• There are related potential developments for managing supply and demand fluctuations (batteries, pumped storage, synchronous condensers etc)

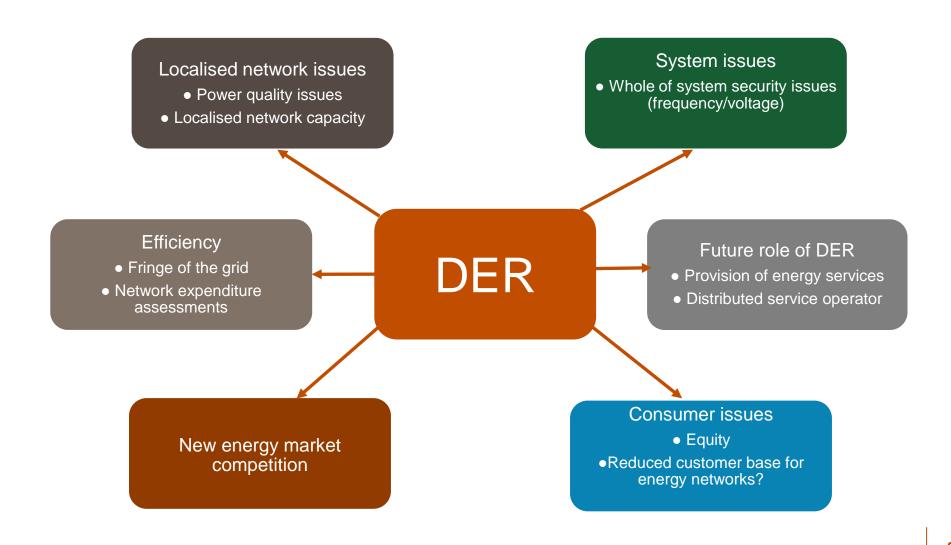
Our experience of the energy transformation

 There are also a range of different directions that the overall management of DER could take

eg passive DER vs active DER

• The rate of change of technology also heightens the risk of asset stranding- timing and value of investment is critical

Overview of DER impacts on network regulation



What does this mean for incentives?

Greater range of options beyond traditional network-solutions;
contestability and capex incentive issues

 There are conceptual and anecdotal arguments to support a conclusion of capex bias but it is very difficult to test empirically

Work we have been doing to promote efficient incentives

Establishment of CESS and DMIS

Binding rate of return instrument

Changes to RITs to better accommodate non-network alternatives

Tariff round-tables, TSSs

Participation in steering groups (eg DEIP)

Could totex help?

 Potentially. The pros and cons depend on what type of totex model you are considering, but in general:

- It can mitigate against financial drivers of capex bias;

 It diminishes the materiality of differences in capitalization policies

Implications to be aware of

 Disconnects revenue from capital funding and depreciation from the economic usefulness of the assets. Could have long term implications.

Material price impacts from the choice of 'slow-money' proportion,
which is by nature somewhat arbitrary

Overall

 The energy transformation heightens the importance of a framework that can accommodate flexibility in expenditure assessment and incentive mechanisms.

- We support a network regulatory framework which allows the flexibility for evolution in:
 - Assessment
 - Incentives
 - Consumer engagement in those assessment processes