

Mike Smart Chief Economist Independent Pricing and Regulatory Tribunal (IPART) PO Box K35, Haymarket Post Shop NSW 1240 Australia

#### Information Paper - Estimating the direct cost of Rail Access

6 March 2024

Dear Mike,

Thank you for the opportunity to review the Information Paper relating to 'Estimating the Direct Cost of Rail Access", and to provide feedback on the supporting spreadsheet model (the **Model**).

The Information Paper canvases a range of topics and issues relevant to estimating the direct costs of rail access. As a general principle, Aurizon Network would expect the relevant approach to estimating direct costs would involve a combination of top-down econometric estimates and bottom-up engineering assessments relevant to the railway being evaluated. Aurizon Network considers the users and providers of the railways regulated by IPART are better placed to inform the IPART's consideration of what approaches should be employed.

Notwithstanding, Aurizon Network has some concerns about the comparability of ARTC and Aurizon Network data used within the Model. Using publicly available information, Aurizon Network has made several adjustments to the data contained within the "Aurizon" tab to facilitate a 'like for like' comparison with the ARTC data used in the regression.

As a result of the adjustments, Aurizon Network has generated the following amended Data tables, which IPART may wish to consider using.

Table 1 is presented inclusive of ballast undercutting costs, which ARTC includes as major periodic maintenance, but which is included as capital expenditure in the Central Queensland Coal Network (**CQCN**). Table 2 is presented exclusive of ballast undercutting expenditure.

Network	Data Year	Track Km	Gross Tonne Km (billions)	Track maintenance cost incl MPM (\$m 2020)
Blackwater	FY21	1,171.36	35.77	88.50
Goonyella	FY21	1,021.32	36.34	82.51
Moura	FY21	315.09	3.36	11.98
Newlands & GAPE	FY21	311.42	9.15	15.27
Hunter PZ1	CY18	305.00	27.30	56.01
Hunter PZ1	CY19	305.00	28.61	60.23
Hunter PZ1	CY20	305.00	27.41	61.99
Hunter PZ1	CY21	305.00	26.98	52.21
Hunter PZ2-3	CY18	405.00	17.91	61.48
Hunter PZ2-3	CY19	405.00	17.98	59.41
Hunter PZ2-3	CY20	405.00	18.10	64.18
Hunter PZ2-3	CY21	405.00	16.87	62.78

#### Table 1 Amended Input Data for Regression (including Ballast Undercutting)

#### Table 2 Amended Input Data for Regression (excluding Ballast Undercutting)

Network	Data Year	Track Km	Gross Tonne Km (billions)	Track maintenance cost incl MPM (\$m 2020)
Blackwater	FY21	1,171.36	35.77	54.49
Goonyella	FY21	1,021.32	36.34	48.12
Moura	FY21	315.09	3.36	10.92
Newlands & GAPE	FY21	311.42	9.15	11.69
Hunter PZ1	CY18	305.00	27.30	56.01
Hunter PZ1	CY19	305.00	28.61	52.95
Hunter PZ1	CY20	305.00	27.41	58.15
Hunter PZ1	CY21	305.00	26.98	52.21
Hunter PZ2-3	CY18	405.00	17.91	45.85
Hunter PZ2-3	CY19	405.00	17.98	51.36
Hunter PZ2-3	CY20	405.00	18.10	54.07
Hunter PZ2-3	CY21	405.00	16.87	47.69

Aurizon Network has summarised the adjustments that were made to generate the amended Input Data in Table 3 below.

#### Table 3 Summary of data adjustments

Data Type	Description of Change		
Aurizon Track Km	The Newlands Track Km data (311km) already includes GAPE Track Km. Amend cell D7 in 'Data' tab to avoid double count of GAPE Track Km.		
Aurizon GTK	Data updated to reflect actual FY21 GTK railed.		
	Made provision to include GTK railed by Non-Coal Train Services. Non-coal GTK is not publicly available,		
	Reallocate a proportion of GAPE GTK to the Goonyella System. Most GAPE Train Services traverse the Goonyella System, GAPE and the Newlands System. An adjustment has been applied to GAPE GTK to reflect the proportion of GTK railed by GAPE Train Services in the Goonyella System (i.e. remove GTK from GAPE, and add to Goonyella).		
Aurizon Network	Data updated to reflect actual FY21 Maintenance Costs.		
Maintenance Costs	Costs associated with maintaining electrical overhead line equipment have been removed from the analysis, because these costs are not comparable with ARTC. The direct costs of access to overhead line equipment are largely independent of the direct costs of track infrastructure and access to electrical infrastructure is typically subject to separate access pricing.		
	Aurizon Network's reported maintenance cost also includes depreciation for ballast undercutting plant and equipment. These costs have been separately identified to facilitate a 'with / without Ballast Undercutting' sensitivity analysis.		
Aurizon Network	Data updated to reflect actual FY21 Capital Expenditure Costs.		
Capital Expenditure	It would seem appropriate to include Aurizon Network's Ballast Undercutting expenditure within this analysis, because such costs are included within ARTC's MPM figures. Data has been provided to facilitate a 'with / without Ballast Undercutting' sensitivity analysis.		
	Aurizon Network's other capital expenditure categories do not appear to be comparable to ARTC's MPM and have been removed from the analysis. I note that costs associated with these activities form part of ARTC's capital expenditure.		
ARTC Data	Added 2021 actual cost and GTK data to provide an additional data point.		
	Propose that ARTC data be grouped into <b>Zone 1</b> and <b>Zone 2-3</b> , instead of Zone 1 and Zone 1-3. Such a change would help to ensure the independence of the X variables in the regression analysis.		
	Consider whether ARTC's non-coal maintenance costs should also be added, noting that provision is made for non-coal Track Km.		

Table 4 below provides references to the public documents used to source the updated data.

Data Type	Table	Link
FY21 GTK	Table 6, 8, 10, 12	https://www.qca.org.au/wp-content/uploads/2022/03/aurizon- network-fy23-final-draft-maintenance-and-renewals-strategy- and-budget-redacted-feb-22.pdf
FY21 Maintenance Cost Incurred	Table 1	https://www.qca.org.au/wp-content/uploads/2021/10/aurizon- fy21-maintenance-claim-final-redacted.pdf
FY21 Electrical Maintenance	Table 6, 8	As above
Ballast Undercutting Plant Depreciation	Table 6, 8, 10, 12	As above
FY21 Renewals Expenditure	Table 2, 5, 7, 9, 12	https://www.qca.org.au/wp-content/uploads/2021/09/aurizon- network-2020-21-capital-expenditure-claim.pdf
ARTC 2021 Data	Table 3A & 3B, pg 16-17	https://www.accc.gov.au/system/files/20230517_HVAU%202 021%20Att%201%20HV%20Network%20Operating%20Cost s_PUBLIC_0.pdf

#### Table 4 Document links to source data.

Once again, that you for the opportunity to review the data used within the Information Paper. Aurizon Network would be happy to discuss any of the adjustments with you in further detail if required.

Kind regards,



Michael Bray Undertaking Development Lead Aurizon Network



# Estimating Marginal Wear and Tear Costs: Econometric Methods and Evidence

Track Access Charges Summit

Professor Andrew Smith, Institute for Transport Studies, University of Leeds

April 4th, 2018, Amsterdam



# A starting point – from an evidence based perspective



- The econometric evidence from European case studies suggests that rail infrastructure maintenance and renewal costs vary substantially with traffic):
  - Variability = high
- Engineering evidence (models) underpinning <u>current</u> track access charges in Britain suggests costs are largely fixed:
  - Variability = low
- Earlier engineering (judgement) in Great Britain (2000; 2005) put variability somewhere in between:
  - Variability = medium
- Can we better understand these differences?

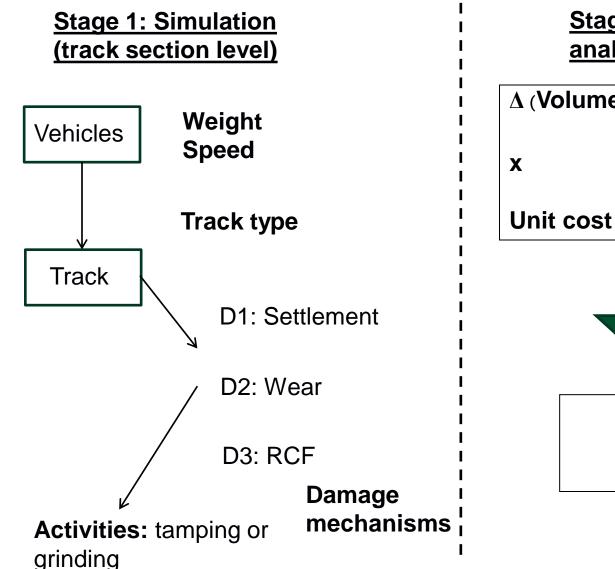
# Approaches to estimating marginal cost



- Three methods have been used in the literature to date to measure rail infrastructure marginal cost
- Method 1: engineering approach (<u>model</u>)
  - Simulate damage done by traffic (engineering model)
  - Determine action need to remedy damage (e.g. tamping)
  - Activity volume \* Unit cost of activity = (marginal) Cost

# Engineering approach: illustration





Stage 2: Unit cost analysis

 $\Delta$  (Volume of tamping)

Unit cost of tamping





# Approaches to estimating marginal cost



- Two methods have been used in the literature to date to measure rail infrastructure marginal cost
- Method 1: engineering approach (<u>model</u>)
  - Simulate damage done by traffic (engineering model)
  - Determine action need to remedy damage (e.g. tamping)
  - Activity volume \* Unit cost of activity = (marginal) Cost
- Method 2: engineering approach (<u>judgement</u>) or cost allocation approach
  - See next slide

# Engineering (judgement) / Cost Allocation Approach



Activity / asset class	Variability	Variability
	Proportion: 2000	Proportion: 2008
	Regulatory Review	Regulatory Review
Track - maintenance	30%	29%
Track – renewals (plain line)	36%	23%
Track – renewals (switches and crossings)	25%	17%
Signalling - maintenance	5%	5%
Civils – metallic underbridges	10%	8%
Civils – embankments	10%	5%

Source: ORR (2008)

# Approaches to estimating marginal cost



- Two methods have been used in the literature to date to measure rail infrastructure marginal cost
- Method 1: engineering approach (<u>model</u>)
  - Simulate damage done by traffic (engineering model)
  - Determine action need to remedy damage (e.g. tamping)
  - Activity volume \* Unit cost of activity = (marginal) Cost
- Method 2: engineering approach (<u>judgement</u>) or cost allocation approach
- Method 3: top down statistical / econometric approach
  - See next slide

Econometric approach – relate costs to traffic in statistical regression

$$C_{it} = f(Y_{it}, P_{it}, N_{it}, \tau_t; \beta) + v_{it}$$

- C<sub>it</sub> is the cost measure say, maintenance and renewal costs
- i is the unit of observation (e.g. track section; maintenance unit; region; country); t is time period (year)
- Y<sub>it</sub> output measures (e.g. passenger tonne-km; freight tonne-km)
- β parameters to be estimated gives us % of cost variable with traffic and in turn, marginal cost

Notes: P<sub>it</sub> - input prices (e.g. wage rate; price of materials); N<sub>it</sub> - exogenous network characteristic variables (e.g. network length; linespeed capability; rail age; proportion of track in a curve; S&Cs); T<sub>it</sub> represent time variables capturing technical change over time

# High level summary of econometric evidence

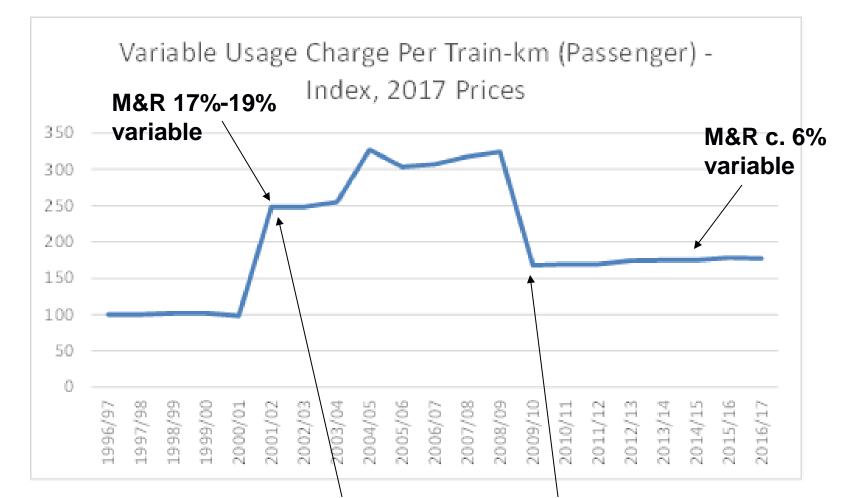
- **Countries**: Britain, Sweden, France, Switzerland, Austria, plus pooled international samples (CATRIN; SUSTRAIL; NETIRAIL-INFRA)
- Data: sections, maintenance units / contract areas, regions, countries
- Maintenance: range of mean elasticities = 20-35% (GB=25%)
- But the answer depends on density range of **20-45%** (3-10m t-km/tr-km)
- Renewal: less evidence:
  - M&R studies from Switzerland and GB (CATRIN) 28-35%. M&R studies from Switzerland (SUSTRAIL) 50%
  - Renewal only for Sweden: **55%** (track) and **50%** (all)
  - M&R from GB Periodic Review international study (area) = 45%
  - M&R from GB Periodic Review international study (country) = 51%

## Conclusions on the range

- Overall evidence seems to suggest variability for M&R could be as high as 40-45%
- The lower part of the range of estimates could suggest a possible range of closer to 25-35%
- Some uncertainty but strong body of reasonably consistent evidence from multiple countries – similar methods
- Interesting recent evidence from France (econometric): c. 20% variable for M&R (with some models pointing to higher variability)
- Evidence does **not** support variability **below 20-25%** so econometric evidence <u>out of line with current GB charges</u>

# Engineering evidence and evolution of charges in GB





### PR2000: Engineering Judgement Approach

PR2008: Engineering Modelling Approach



- Why is the evidence so contradictory?
- Challenges in econometric estimation of marginal cost?
- Strengths and weakness of the two approaches

# Challenges in econometric model of marginal cost [1]



- Dealing with lumpy renewals costs?
  - Two-part models: decision to renew, then how much to renew (section level data); e.g. Andersson et. al. (2012) Odolinski and Nilsson, 2017
  - Maintenance and renewal combined together (many studies)
  - Steady-state adjustments to renewals prior to estimation (Smith, 2012)
  - Dynamic models that take account of M&R interactions and intertemporal effects (Odolinski and Wheat, 2017 – NETIRAIL-INFRA)
- Controlling for differences between sections/regions/countries?
  - Extensive set of control variables. E.g. Electrification, age of rail, linespeed, no. of S&Cs per track-km, proportion of track in a curve etc.
  - Cross-sectional and panel data approaches taken: different panel techniques applied (fixed and random effects; and frontier models)
  - Standardisation of approach to some extent

# Challenges in econometric model of marginal cost [2]



- Data types and coverage:
  - Range of aggregations tried: sections; maintenance units / contract areas; regions; countries; dual-level structures
  - Data coverage: co-ordinated research across EU research projects suggests a generally <u>broad definition of M&R costs</u> (except stations)
  - Scaled elasticities: can be used where narrower definitions of costs are used (e.g. in GB, focus was on track – the most variable element)
- Functional form of the cost function
  - Wide range tried from CD and translog to Box-Cox and Box-Tidwell forms
  - Issue is about ensuring sensible variation in elasticities away from the sample mean
  - Again, standard methods applied across case studies in general

# So why the differences with engineering methods?

- Strong advantage of the econometric approach is that it is based on actual data what actually happens on the ground
- Whereas engineering approach is based on a model of what "should" happen – though which is optimal?
- Engineering models: getting from simulated damage to cost?
  - Assumptions about unit costs and timing of remedial activity
- In GB the engineering approach:
  - Is based on a standard section not an average based on all sections
  - Some calibration involved to reconcile to budgeted costs

### But can these things explain the extent of the difference?

- With track-section disaggregation there may be a concern that the process of cost allocation to sections could distort results
- If a percentage mark-up on direct costs is used in log models the elasticity will be unaffected – but the variability proportion is then being applied to indirect costs as well
- If allocated based on traffic the elasticity / variability proportion will be distorted
- That said, the evidence from sections, areas, regions, countries is still fairly clear overall

## Conclusions

- Overall, co-ordinated research has produced a wide body of fairly consistent evidence; using a range of approaches, different case studies, and different disaggregations
- There are issues and challenges and some uncertainty however, It is hard though to disturb the basic conclusion – that M&R cost variability is no lower than 20-25% and is probably higher
- GB engineering evidence is much lower there are some possible explanations but further research needed:
  - Lets open-up the "black box" on both approaches to obtain a clear finding on this important issue for charging levels



Thank-you for your kind attention

### **Professor Andrew Smith**

Professor of Transport Performance and Economics

Institute for Transport Studies (ITS) and Leeds University Business School, University of Leeds, Leeds, LS2 9JT



### References

- Odolinski, K. & Nilsson, J-E. (2017) Estimating the marginal maintenance cost of rail infrastructure usage in Sweden; does more data make a difference? Economics of Transportation, 10, 8-17.
- Andersson M; Wikberg T; Smith A; Wheat P (2012) Estimating the marginal cost of railway track renewals using corner solution models, *Transportation Research Part A: Policy and Practice*, 46, pp.954-964.
- Smith ASJ (2012) The application of stochastic frontier panel models in economic regulation: Experience from the European rail sector, *Transportation Research Part E: Logistics and Transportation Review*, 48, pp.503-515.
- Odolinski, K. and Wheat, P.E. NETIRAIL-INFRA Deliverable D1.7. Incentives Final Report - Annex 5 – Marginal wear and tear costs in Sweden using a 16 year panel.



Additional slides not used





Costs		Revenue from track access charg	es
Operations	554	Variable usage charge	224.2
Maintenance	1319	Capacity charge	428.3
Renewals	2774	Fixed charges	410.8
		Use of electrification assets	16.1
Implies: M&R c. 6%	6	Stations and depots	353.0
variable		TOTAL	1432.4

Source: Network Rail (2017) Statement 1 (expenditure), Statement 6a (Analysis of Income) and Statement 6c (Analysis of Income by Operator).

### Cost bases



# Maintenance (most studies)

- Permanent way
- Signalling and lineside telecoms
- Electrification and plant
- Other maintenance (including inspections and overheads)
- Most studies an "inclusive" definition (except GB)
- Stations, depots and lineside buildings generally excluded
- Structures maintenance included in Sweden and Switzerland (not GB)

# Maintenance & Renewal

- Sweden and Switzerland cases
- Track
- Signalling
- Electrification
- Telecoms
- Power supply equipment
- Crossings
- Platforms (some station costs)
- Fences
- Snow removal (Sweden)

# Pros and cons of different approaches

### Engineering approach

- Requires multiple model
   runs
- Requires detailed model relating damage to remedial activity
- Unit costs hard to estimate, as vary depending on circumstances

### Statistical approach

**UNIVERSITY OF LEEDS** 

- Uses actual costs powerful advantage of topdown benchmarking
- Based on expenditure rather than cost needed to rectify damage
- Differential impact of passenger and freight?



# Track access charges on the basis of European legal framework – Frist experiences with direct cost calculation

Track Access Charges Summit 2018 04.-05.04.2018

> Christiane Trampisch DG MOVE, Unit C3



### Legal basis for track access charges in the European framework

Directive 2012/34/EU establishing a single European railway area

- Article 30 Infrastructure costs and accounts
- Article 31 Principles of charging
- Article 32 Exceptions to charging principles
- Annex VI List of market segments

Regulation 909/2015 on the modalities for the calculation of the cost that is directly incurred as a result of operating the train service

- Article 3 Direct costs on a network-wide basis
- Article 4 Non-eligible costs
- Article 5 Calculation and modulation of direct costs
- Article 6 Cost modelling



## **Transposition of Directive 2012/34/EU**

# **Deadline for transposition** of Directive 2012/34/EU was **16.06.2015.**

Between June 2015 and until mid 2017 member states were still transposing the directive into national law.

Since transposition deadline the European Commission checks **conformity** under two aspects:

Complete transposition: Conformity of "paper law" (infringements) Conformity in application/practice (infringements)

**Timetable process** (network statements + charging systems)

Charging systems need to be confrom in application.



### **Status quo of IMs' charging systems**

- New pricing scheme under Directive and Regulation in DE, FR, HR, HU, IT, LV, SL
- Processes due to the introduction of new pricing schemes ongoing (under regulatory control) in (AT), BE, BG, EE, EL, ES, LT, NL, NO, PL, PT, RO, (SE), SK
- Direct costs applied before in DK, FI, LU, SE, UK, (CH)
- No known developments in CZ, IE, FYROM



### **Overview charging practices**

	Charge(s) reflecting direct costs (article 31.3 of directive 2012/34/EU)	Market segments? (article 32.1 of directive 2012/34/EU)	Mark-ups "if the market can bear this" (article 32.1 of directive 2012/34/EU)	Incentives under article 30.1 of directive 2012/34/EU
Austria	<ul> <li>✓</li> </ul>	✓	<b>x</b> <sup>1</sup>	n/a
Belgium <sup>2</sup>	×	✓	×	×
Bulgaria	✓	×	×	√
Croatia	✓	×	×	×
Denmark	✓	×	×	√
Estonia	<b>x</b> <sup>3</sup>	x	×	x
Finland	✓	x	×	x
France	<ul> <li>✓</li> </ul>	✓	✓	√4
Germany	✓	~	√	√
Greece	<b>x</b> <sup>5</sup>	x	×	x
Hungary	✓	✓	√	n/a
Italy	✓	✓	✓	√
Latvia	✓	✓	√6	<b>x</b> <sup>7</sup>
Luxemburg	<ul> <li>✓</li> </ul>	×	×	n/a
Netherlands	✓	~	√8	x
Norway	✓	✓	✓	√
Poland	✓	√9	<b>x</b> <sup>10</sup>	√
Portugal	<b>x</b> <sup>11</sup>	×	×	×
Romania	√12	<b>x</b> <sup>13</sup>	<b>x</b> <sup>14</sup>	√15
Slovakia	✓	×	×	x
Slovenia	<ul> <li>✓</li> </ul>	×	×	✓
Spain <sup>16</sup>	×	✓	×	n/a
Sweden	✓	<b>x</b> <sup>17</sup>	<b>x</b> <sup>18</sup>	x
Switzerland	<ul> <li>✓</li> </ul>	✓	✓	×
UK	✓	√	√	√

https://www.irgrail.eu/irg/docum ents/positionpapers/166,2017. html (simplified)



### Method of calculation of direct costs used in the member states

- Method of Article 5 (division method): AT, BG, CZ, DK, EE, ES, HU, LV, PL (Article 3 and 5 and scientific research), PT, SL, SK
- Econometric approach: FI, HR, LU, NO, SE (Article 6)
- Engineering method: BE, CH, UK
- Mixed approach (econometric and engineering method): DE, EL, FR, FYROM (Article 5 and econometric method), IE, IT (Article 5 and engineering method), NL (combination of econometric, engineering and experts), RO

See table in IRG-Rail (2017) https://www.irg-rail.eu/irg/documents/position-papers/166,2017.html



### Switzerland, France + Austria: decreasing values

CH: No corresponding price increase due to the calculation method according to Regulation.

"It seems that comparing with the previous econometric model, the new approach shifts costs from the freight transport (by considering other factors than weight for wear-related costs, i.e. speed and axle loads) to the passenger long-distance traffic."

FR: "The direct cost based charge in the new charging system for 2019 is decreasing for every service. Mark-up based charges for passenger trains will maintain the same level of charge for each market segment."

AT: New TAC-systems leads to a reduction of average TAC per train km



## Phasing-in plan according to Art. 9 regulation

- Yes BE, BG, LV, NO, PL, PT, UK
- On selected lines ES
- Not yet EL, IE, IT, LT, SL
- No phasing-in plan AUT, CH, CZ, DE, DK, EE, FR, FI, HR, HU, LU, FYROM, NL, RO, SE, SK



Mark-ups

• Mark-ups applied:

AT, DE, EE (Ramsey-Boiteux model)
ES, FR, IT (competitiveness of market segment)
HU (general mark-up, adjusted)
NO (on one selected maket segment)
UK (on one market segment (electric supply industry: coal, iron ore and nuclear waste))
CH (politically defined mark-ups)

- Mark-ups to come: BE (market segmentation ongoing) LV (mark-ups to come, competitiveness of market segment) NL (not yet, 2020-2024, Ramsey-Boiteux) PT (not yet, mark-ups to come)
- No mark-ups applied:

BG, CZ (but differentiated financial state support), DK, EL, FI, HR, IE, LU, PL, FY, ROM, RO, SE, SL, SK, LT



#### Problems with the calculation of direct costs and mark-ups (RBs)

- Issues with applying or not applying mark-ups
- Availability of data for calculation of mark-ups, for DC calculation and market segmentation challenging
- Inconsistencies found and removed when developping the calculation method of DC
- Burden of introducing DC calculation and data on demand elasticities
- Necessary cost allocation / definition of cost categories
- Procedures and terminology applied in IM's infrastructure management and cost follow-up practices are largely incompatible with the definitions and categories used + large complexity for smaller IMs
- Research support needed (launch a study)



## **Charges in the network statement**

- Annex IV of the Directive 2012/34/EU about the contents of the network statements
- The Network statement contains
  - the relevant provisions of the national legislation
  - general information on the charging system and charging regulations.
  - provides all the methodological details concerning the new modalities of calculation.
- The applicable charges are laid down in a separate document which is attached to the network statement e.g. via a link.
- The cost allocation and charge calculation principles are laid down in the Cost Allocation Methodology.



### Thank you for your attention.





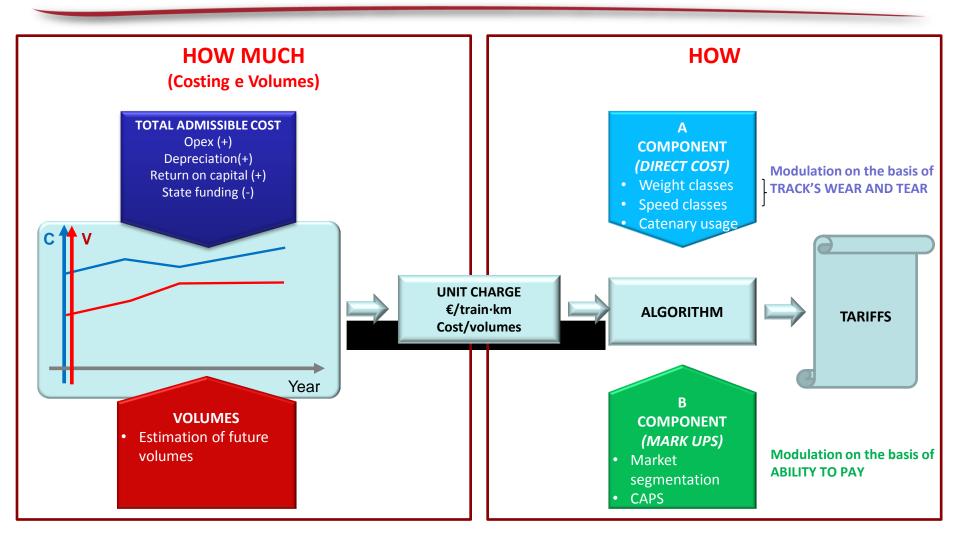


# Direct Cost in Track Access Charge: the Italian case

**Giulio Rocco Sitongia** Charge designer at Marketing and Integrated Services Development at RFI

Amsterdam, 4-5 April 2018

#### **Elements of the charging system**





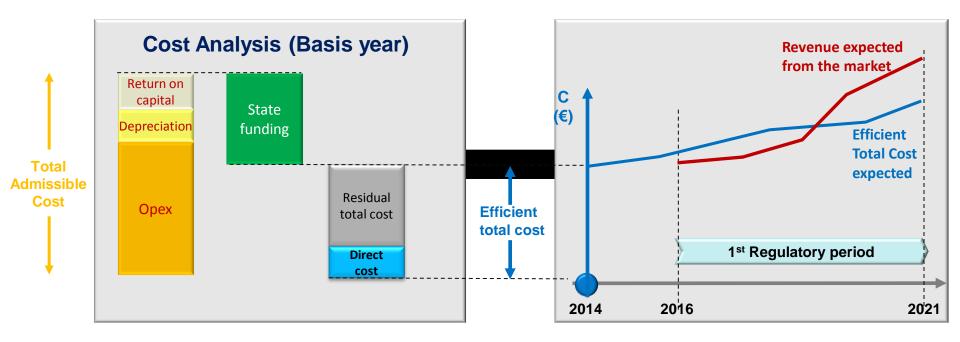


#### **Costs, revenues and their forecasting**

At the end of Regulatory period 2016-21

#### **Efficient Total Cost = Revenue from the Market**

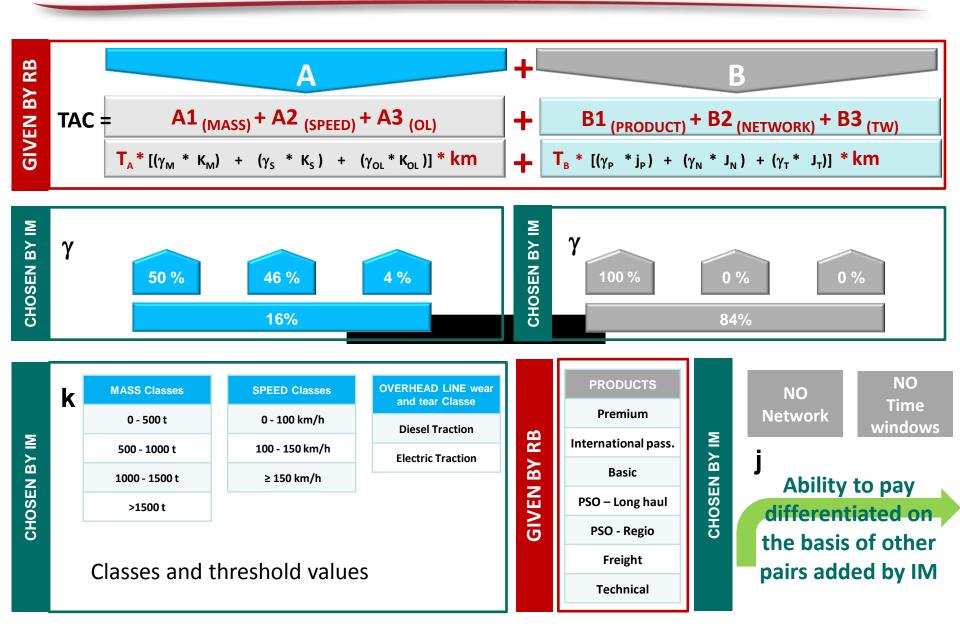
(Financial Equivalence)



\*According to the last Regulatory Accounting (2014)

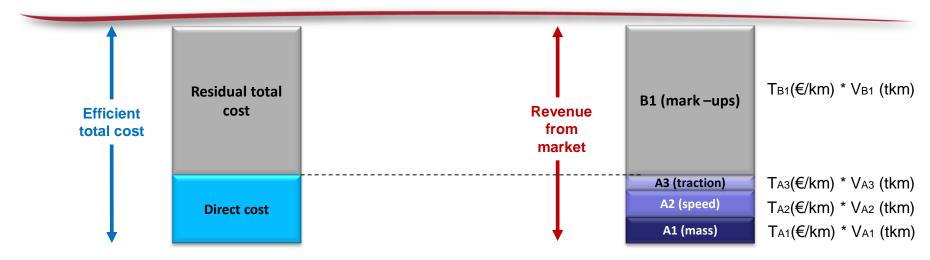


#### **Track Access Charge Algorithm**



AB

#### **Modeling direct cost and tariffs**

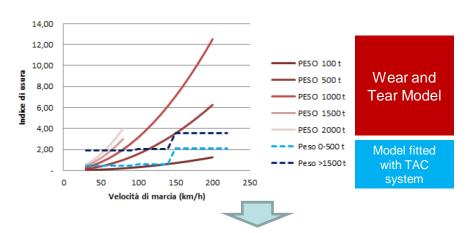


Estimation of Total Amount of Direct Cost through an **allocation model:** 

- Consider some category of maintenance operations on the track and on the overhead line
- Considered just one year of observation (according to Regulatory Accounting 2014)

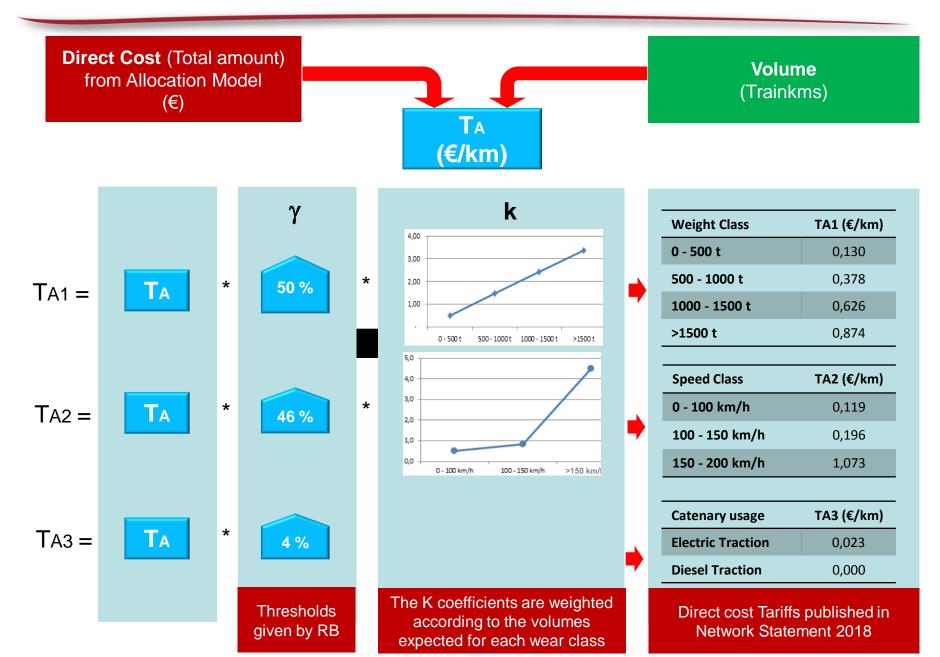
### Modulating total amount of direct cost through a Wear and Tear model:

Formula was imposed by the RB (simple linear onsidering only 3 parameter)
 Formula doesn't consider line parameter

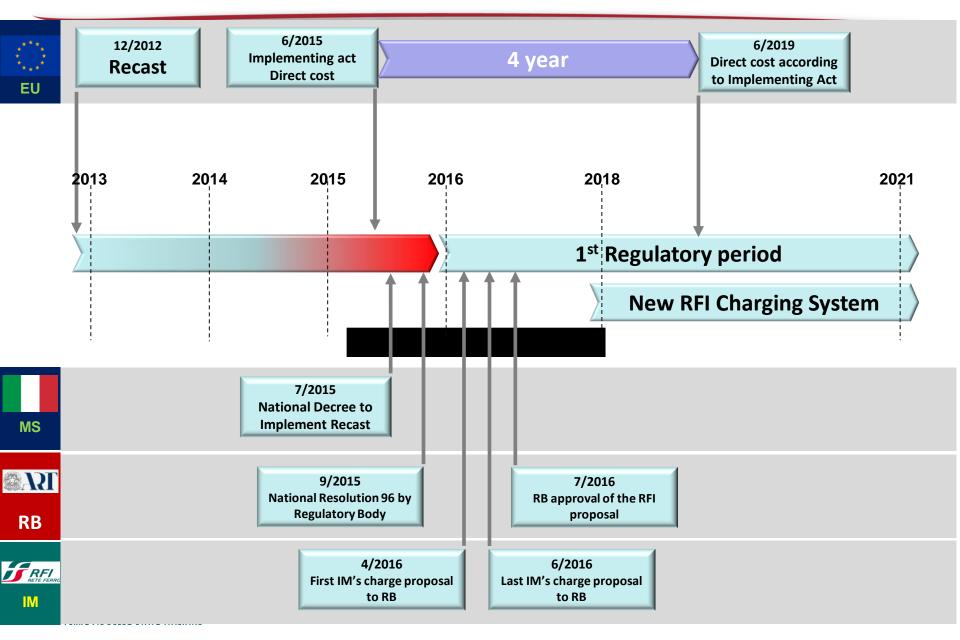


June 2019: One model for both (econometric or engineering model)

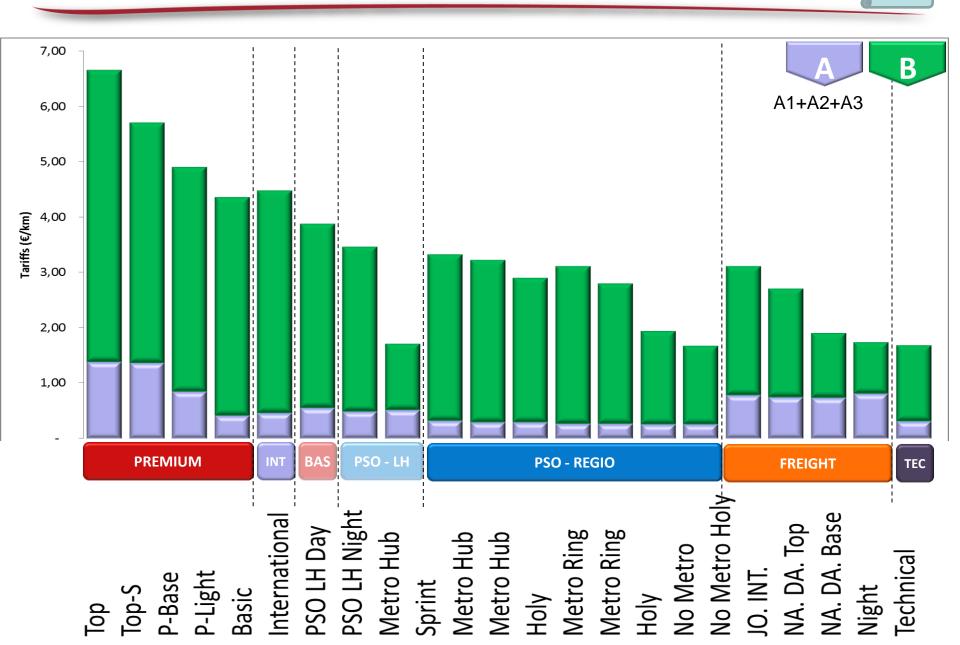
#### **Setting Direct cost tariffs**



#### **Road Map**



#### **List of Tariffs 2018**



TARIFFS

# Thank you for your attention!

