

Denise Silva Ferreira Juvenal  
[rio1042370@terra.com.br](mailto:rio1042370@terra.com.br)

Accountant

Individual Commentary

Rio de Janeiro / Brazil

Sir Chairman

Hans Hoogervorst

International Accounting Standards Board – IASB

IFRS Foundation Publications Department.

1st Floor, 30 Cannon Street, London EC4M 6XH, United Kingdom.

Tel: +44 (0)20 7332 2730 Fax: +44 (0)20 7332 2749

Email: [publications@ifrs.org](mailto:publications@ifrs.org) Web: [www.ifrs.org](http://www.ifrs.org)

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### **Regulatory Deferral Accounts**

I'm Denise Juvenal this is my individual commentary and is pleased to have the opportunity to comment this proposal of Regulatory Deferral Accounts. I agree with this exposure draft.

#### **Questions for respondents**

##### **Question 1**

**The Exposure Draft proposes to restrict the scope to those first-time adopters of IFRS that recognised regulatory deferral account balances in their financial statements in accordance with their previous GAAP.**

**Is the scope restriction appropriate? Why or why not?**

Yes. I agree with restrict scope to those first-time adopters of IFRS, that recognised regulatory deferral account balances in their financial statements.

##### **Question 2**

**The Exposure Draft proposes two criteria that must be met for regulatory deferral accounts to be within the scope of the proposed interim Standard. These criteria require that:**

- (a) an authorised body (the rate regulator) restricts the price that the entity can charge its customers for the goods or services that the entity provides, and that price binds the customers; and**
- (b) the price established by regulation (the rate) is designed to recover the entity's allowable costs of providing the regulated goods or services (see paragraphs 7–8 and BC33–BC34).**

**Are the scope criteria for regulatory deferral accounts appropriate? Why or why not?**

Yes. I agree with scope criteria for regulatory deferral account.

### **Question 3**

**The Exposure Draft proposes that if an entity is eligible to adopt the [draft] interim Standard it is permitted, but not required, to apply it. If an eligible entity chooses to apply it, the entity must apply the requirements to all of the rate-regulated activities and resulting regulatory deferral account balances within the scope. If an eligible entity chooses not to adopt the [draft] interim Standard, it would derecognise any regulatory deferral account balances that would not be permitted to be recognised in accordance with other Standards and the *Conceptual Framework* (see paragraphs 6, BC11 and BC49).**

**Do you agree that adoption of the [draft] interim Standard should be optional for entities within its scope? If not, why not?**

Yes. I agree that adoption of the interim Standard should be optional for entities within its scope.

### **Question 4**

**The Exposure Draft proposes to permit an entity within its scope to continue to apply its previous GAAP accounting policies for the recognition, measurement and impairment of regulatory deferral account balances. An entity that has rate-regulated activities but does not, immediately prior to the application of this [draft] interim Standard, recognize regulatory deferral account balances shall not start to do so (see paragraphs 14–15 and BC47–BC48).**

**Do you agree that entities that currently do not recognise regulatory deferral account balances should not be permitted to start to do so? If not, why not?**

I agree that that entities that currently do not recognize regulatory deferral account balances should not be permitted to start.

### **Question 5**

**The Exposure Draft proposes that, in the absence of any specific exemption or exception contained within the [draft] interim Standard, other Standards shall apply to regulatory deferral account balances in the same way as they apply to assets and liabilities that are recognised in accordance with other Standards (see paragraphs 16–17, Appendix B and paragraph BC51).**

**Is the approach to the general application of other Standards to the regulatory deferral account balances appropriate? Why or why not?**

I agree that the general application of other Standards to the regulatory deferral account balances appropriate.

### **Question 6**

**The Exposure Draft proposes that an entity should apply the requirements of all other Standards before applying the requirements of this [draft] interim Standard. In addition, the Exposure Draft proposes that the incremental amounts that are recognized as regulatory deferral account balances and movements in those balances should then be isolated by presenting them separately from the assets, liabilities, income and expenses that are recognised in accordance with other Standards (see paragraphs 6, 18–21 and BC55–BC62).**

**Is this separate presentation approach appropriate? Why or why not?**

I do not have certainty about separate presentation approach appropriate, I suggest for The Board consults others regulators with ESMA, IOSCO and FRC.

#### **Question 7**

**The Exposure Draft proposes disclosure requirements to enable users of financial statements to understand the nature and financial effects of rate regulation on the entity's activities and to identify and explain the amounts of the regulatory deferral account balances that are recognised in the financial statements (see paragraphs 22–33 and BC65).**

**Do the proposed disclosure requirements provide decision-useful information? Why or why not? Please identify any disclosure requirements that you think should be removed from, or added to, the [draft] interim Standard.**

I think that for provide decision-useful information is complex. I understand that for application of IFRS is very difficult, I don't know if the users are prepared for elaborated these informations, I suggest for the board consulting regional and local regulators around the world.

#### **Question 8**

**The Exposure Draft explicitly refers to materiality and other factors that an entity should consider when deciding how to meet the proposed disclosure requirements (see paragraphs 22–24 and BC63–BC64).**

**Is this approach appropriate? Why or why not?**

Yes, I think that is very important explicitly refers to materiality and other factors that an entity need to consider.

#### **Question 9**

**The Exposure Draft does not propose any specific transition requirements because it will initially be applied at the same time as IFRS 1, which sets out the transition requirements and relief available.**

**Is the transition approach appropriate? Why or why not?**

Yes, I think that the transition approach is appropriate.

#### **Question 10**

**Do you have any other comments on the proposals in the Exposure Draft?**

I suggest for the board consult local regulators and regional regulators, for this draft I understand that is very important to observed the problems in the application. In this case the countries need to elaborate a consolidation for send for IASB if is possible execution and the problems occurred in this process, I don't know, this is my opinion.

Thank you for opportunity for comments this proposal, if you have questions don't hesitate contact to me, [rio1042370@terra.com.br](mailto:rio1042370@terra.com.br).

Yours,

Denise Silva Ferreira Juvenal

[rio1042370@terra.com.br](mailto:rio1042370@terra.com.br)

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