

NEW IFRS STANDARD

# Regulatory Assets and Regulatory Liabilities

## IFRS 20

*Issued 27 May 2026 · Effective 1 January 2029 · Supersedes IFRS 14*

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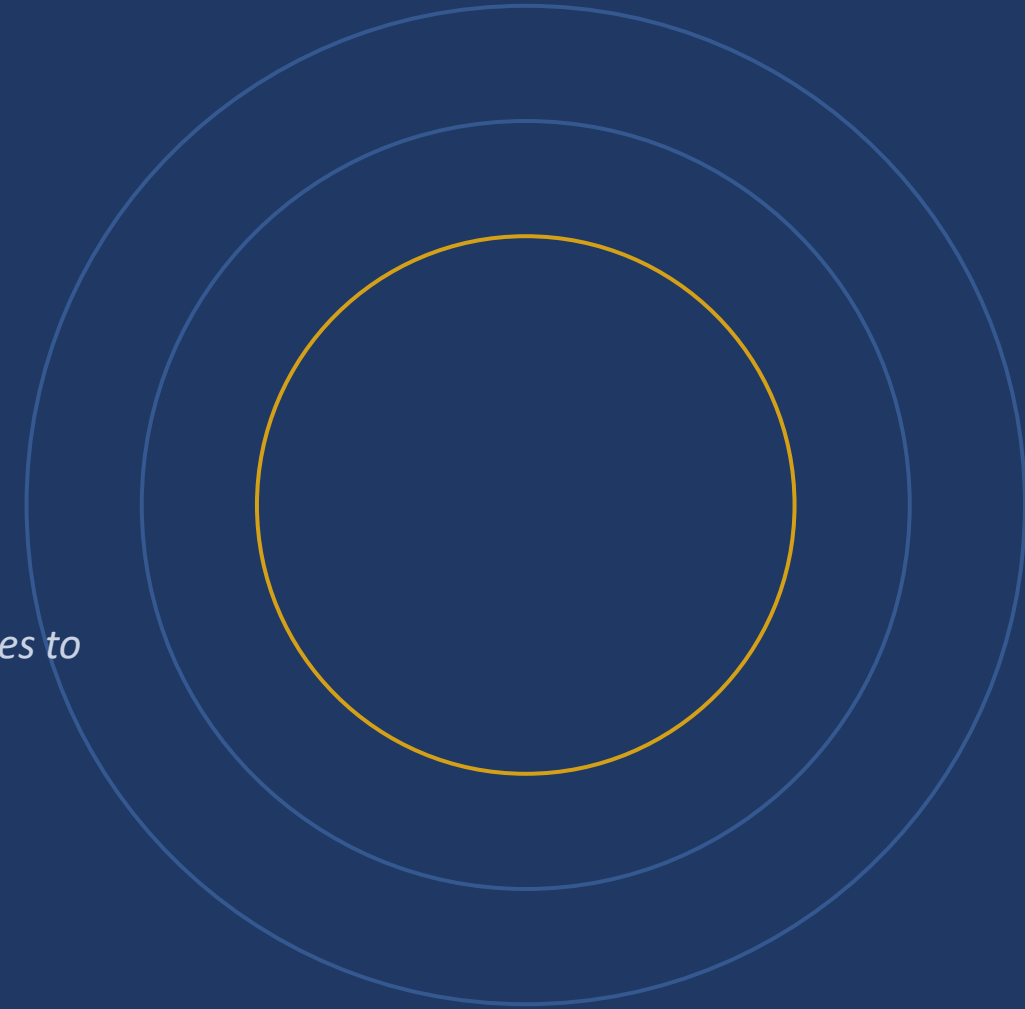
*A structured walk-through of the IASB's newest Standard for entities subject to rate regulation*

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PART I

# Introducing IFRS 20

*Why the Standard was needed, its effective date and transition, and who it applies to*



## BACKGROUND

# Why IFRS 20 Was Needed

*Issued by the IASB on 27 May 2026, completing a project of more than 15 years on rate-regulated activities.*

- For entities subject to rate regulation, IFRS 15 revenue alone often does not fully reflect performance for the period – the regulator may allow compensation for goods or services supplied in one period to be recovered through rates charged in a different period
- Before IFRS 20, IFRS Accounting Standards offered no comprehensive model for reporting these effects, leading to diversity in practice – some entities recognised regulatory balances, others did not
- IFRS 20 closes that gap with a single, mandatory model that applies to any entity meeting its scope criteria, regardless of industry

# Effective Date and Transition

## Effective 1 January 2029



Applies to annual reporting periods beginning on or after 1 January 2029, subject to local endorsement

## Early Application Permitted



Entities may adopt IFRS 20 before the mandatory effective date

## Supersedes IFRS 14



IFRS 14 Regulatory Deferral Accounts – an interim, optional Standard – is fully replaced

## No Longer Optional



Unlike IFRS 14, IFRS 20 is mandatory for any entity that meets its scope criteria

## SCOPE

# A Two-Part Test

*A regulatory asset or regulatory liability can exist only where both conditions below are met:*

- 1 A regulatory agreement exists** the entity and a regulator are parties to an agreement that prescribes the regulated rate the entity can charge customers for goods or services supplied
- 2 A timing difference arises** part or all of the total allowed compensation for goods or services supplied in one period is charged to customers in a different period

### KEY POINT

The existence of a regulatory asset or liability depends entirely on the terms of the regulatory agreement – there is no industry carve-out and no election not to apply the Standard.

# Who Is Affected

*IFRS 20 is not sector-specific, but is expected to be particularly relevant to entities operating in:*

## Electricity & Gas



Utilities operating under cost-of-service or incentive-based rate regulation

## Water



Regulated water and wastewater utilities

## Public Transport



Rail, toll roads and other regulated transport infrastructure

## Telecommunications

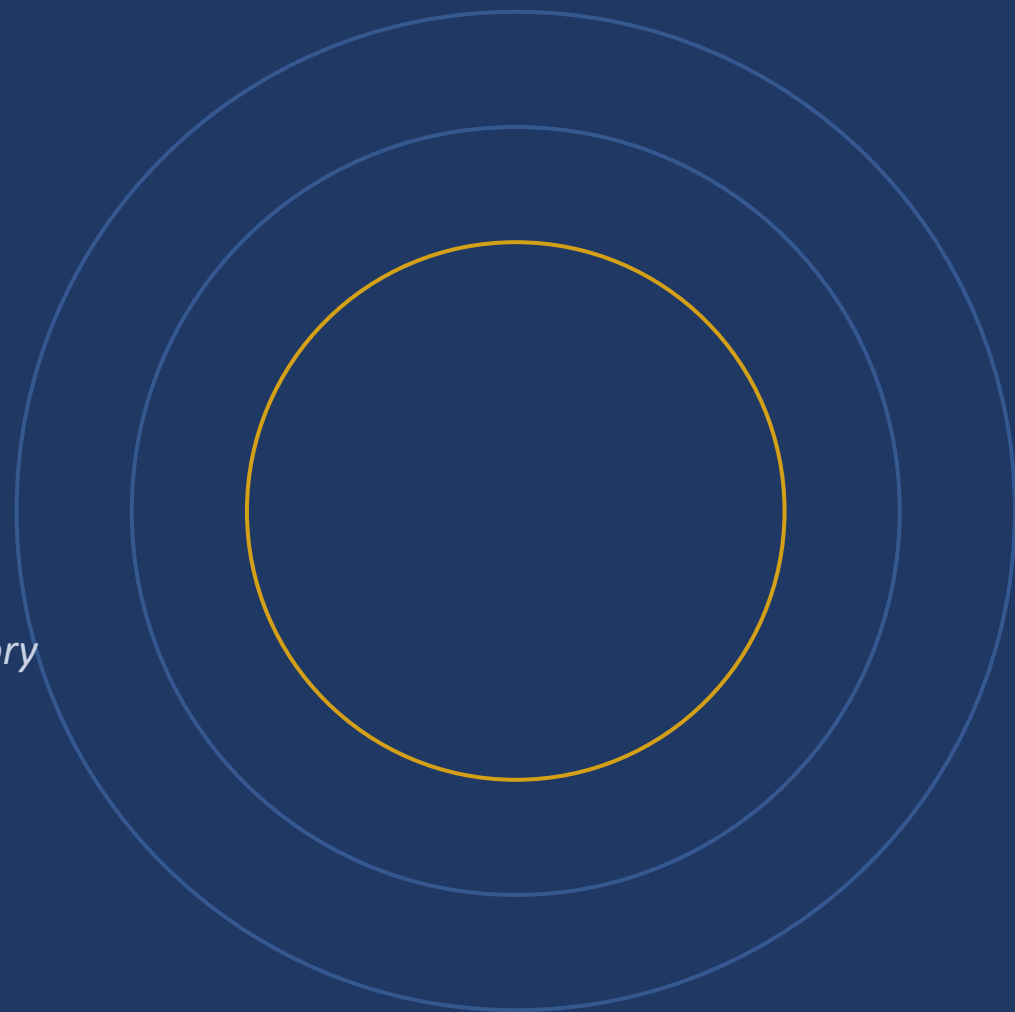


Regulated network and infrastructure providers

## PART II

# Core Concepts

*Total allowed compensation, differences in timing, and the definitions of regulatory assets and liabilities*





# Matching Compensation to the Period Supplied

## THE CORE PRINCIPLE OF IFRS 20

An entity recognises the total allowed compensation for regulatory goods or services in the same reporting period in which those goods or services are supplied.

## HOW IT WORKS

IFRS 20 supplements IFRS 15 through an 'overlay' approach: the entity first applies IFRS 15 to recognise revenue, then recognises regulatory assets and liabilities to capture the timing differences that IFRS 15 alone does not reflect.

## KEY TERM

# Differences in Timing

### DEFINITION

A difference in timing arises when part or all of the total allowed compensation for regulatory goods or services supplied in one reporting period is included in determining the regulated rate charged to customers in a different reporting period.

#### STEP 1

##### Goods/Services Supplied

Regulatory goods or services are delivered to customers in Period 1



#### STEP 2

##### IFRS 15 Revenue Recognised

Revenue for Period 1 is recognised based on estimated compensation



#### STEP 3

##### Rate Adjusted in Period 2

The regulatory agreement allows the under- or over-recovery to be reflected in a later period's rate

## KEY TERM

# Total Allowed Compensation

### DEFINITION

The amount to which an entity is entitled for regulatory goods or services supplied in a reporting period, as determined under the terms of the regulatory agreement – which may differ from the revenue recognised for that period under IFRS 15.

### WHY IT MATTERS

Total allowed compensation is the benchmark against which IFRS 15 revenue is compared. Any gap between the two is what gives rise to a regulatory asset or regulatory liability.

## COMPARISON

# Regulatory Asset vs. Regulatory Liability

| Regulatory Asset                                                                                                                                                                                                            | Regulatory Liability                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Exists when the entity has an enforceable present right to add an amount to be charged to customers in future periods in determining the regulated rate – typically arising from an under-recovery of allowed compensation. | Exists when the entity has an enforceable present obligation to deduct an amount to be charged to customers in future periods in determining the regulated rate – typically arising from an over-recovery of allowed compensation. |

## KEY TERM

# The 'Direct Relationship' Concept

*For regulatory balances arising from depreciation of a regulatory capital base (RCB), recognition requires a direct relationship between the RCB and the related depreciable or amortisable assets.*

### Introduced in Response to Feedback



Added after stakeholders raised concerns about differences between the regulatory recovery period and asset useful lives

### An Evidence-Based Test

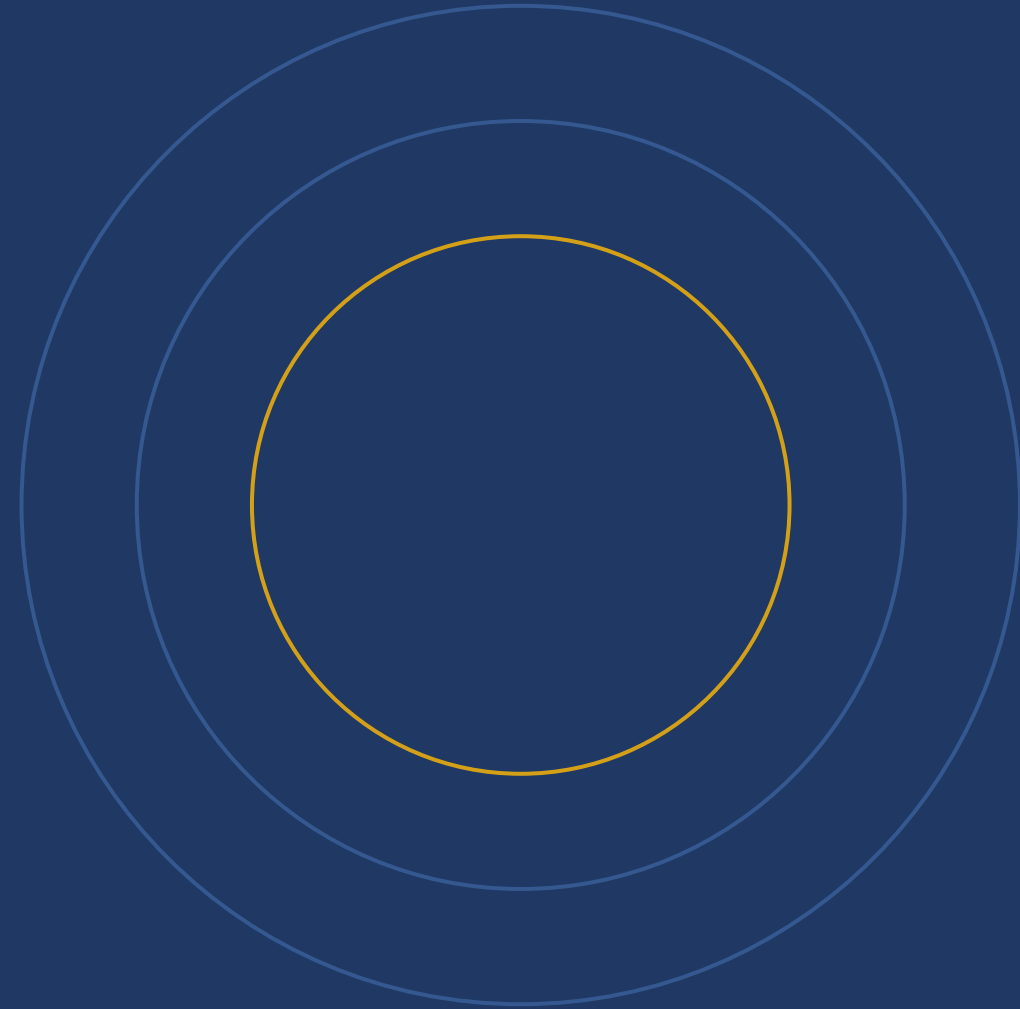


The Standard sets out indicators used to assess whether that direct relationship exists in a given regulatory agreement

PART III

# Recognition & Measurement

*The recognition test and the cash-flow-based measurement technique*



# When to Recognise a Regulatory Balance

- 1 Recognise what exists at the reporting date** an entity recognises all regulatory assets and regulatory liabilities that exist at the reporting date
- 2 Apply a probability threshold where uncertain** in cases of uncertainty, a regulatory asset or liability is recognised when it is more likely than not that it exists
- 3 Some balances are conditional** recognition of certain regulatory assets and liabilities – particularly those linked to the direct relationship concept – is subject to specified conditions being met

# The Cash-Flow-Based Technique

*Regulatory assets and liabilities are measured using a single, uniform technique across the Standard:*

## STEP 1

### Estimate Future Cash Flows

Model all future cash flows expected to arise from the recovery of a regulatory asset or fulfilment of a regulatory liability



## STEP 2

### Apply the Regulatory Interest Rate

Discount those cash flows using the regulatory interest rate specified in the regulatory agreement



## STEP 3

### Update Each Period

Cash flow estimates are reassessed and updated at each reporting date

## DISCOUNT RATE STABILITY

The regulatory interest rate used at initial measurement generally remains unchanged in subsequent periods, unless the regulator directly alters it.



# Simplified Measurement Approach

## WHEN IT APPLIES

Where an item affects regulated rates only when cash is paid or received, a simplified approach is available: the regulatory asset or liability is measured at the carrying amount of the related liability or asset, adjusted for differences such as credit risk or demand risk.

## PRACTICAL EFFECT

This avoids building a full discounted cash flow model for straightforward, cash-triggered regulatory items where the general technique would add complexity without adding useful information.

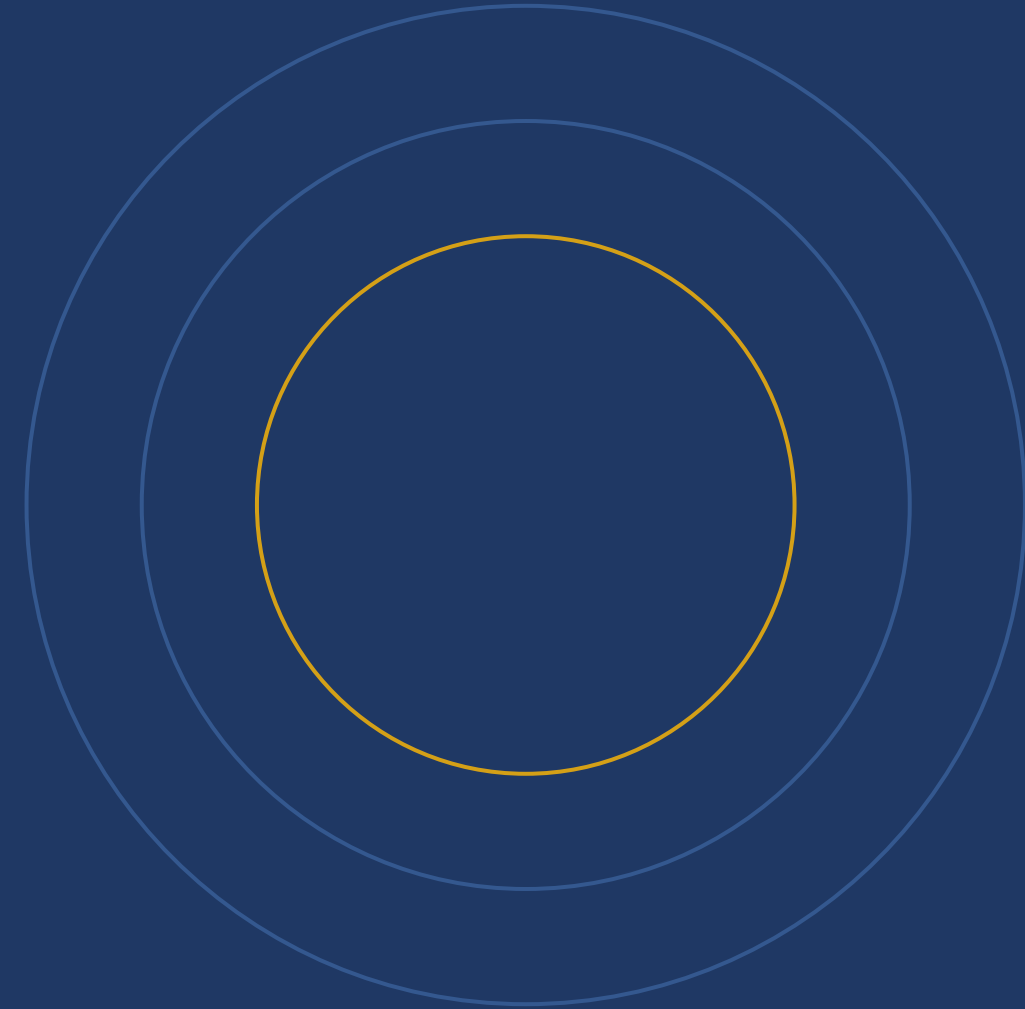
# Subsequent Measurement

- 1 Cash flows are reassessed** estimated future cash flows are updated at each reporting date to reflect the latest information
- 2 The discount rate is held constant** the regulatory interest rate applied at initial measurement is not revised for subsequent changes in market rates
- 3 Regulator-driven changes are the exception** the discount rate is only updated where the regulator itself directly changes the regulatory interest rate for that balance

## PART IV

# Presentation & Disclosure

*Where regulatory items appear in the financial statements, and what must be disclosed*



# Statement of Profit or Loss

## A Separate Line, Within Revenue



Regulatory income minus regulatory expense is classified as revenue and presented as a separate line item, immediately alongside IFRS 15 revenue

## Interest Is Included



Regulatory income includes regulatory interest income; regulatory expense includes regulatory interest expense

## OCI Items Follow Their Source



Where regulatory income or expense relates to an item recognised in OCI under another Standard, the related regulatory item is also recognised in OCI

## Full Visibility for Investors



Investors see both IFRS 15 revenue and the regulatory adjustment needed to reach total allowed compensation

# Statement of Financial Position

## SEPARATE LINE ITEMS

Regulatory assets and regulatory liabilities are presented separately from other assets and liabilities, and are classified between current and non-current.

## PRESENTATION BASIS

An entity uses a current/non-current presentation unless a liquidity-based presentation provides a more useful structured summary, consistent with the general presentation requirements of IFRS 18.

# What Must Be Disclosed

*IFRS 20 requires extensive disclosures to end the 'black box' treatment of regulatory balances, giving insight into how they arose and their risks and uncertainties:*

## Reconciliations



Opening to closing carrying amounts of regulatory assets and regulatory liabilities

## Maturity Analysis



Expected timing of recovery or fulfilment of regulatory balances

## Risks and Uncertainties



Discount rate, and the risks and uncertainties affecting recovery or fulfilment

## Unrecognised Balances

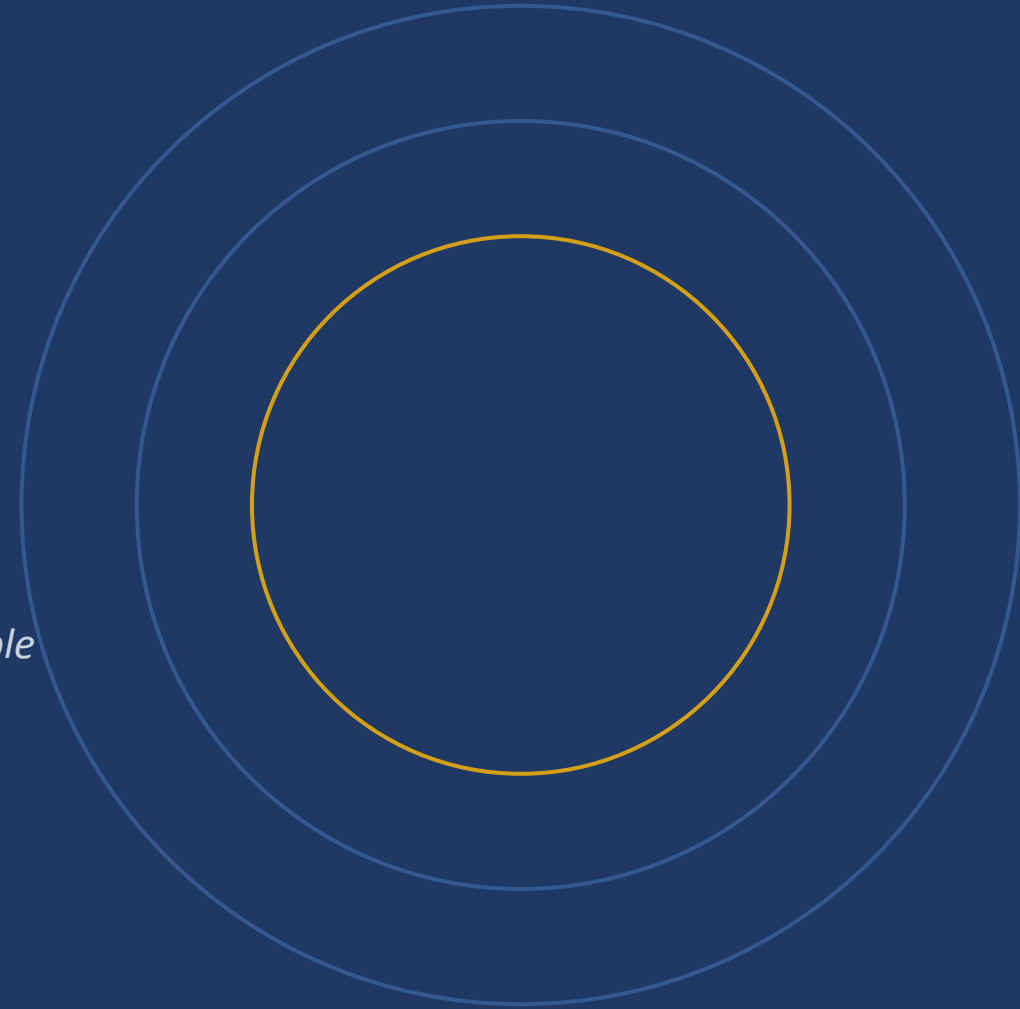


Regulatory assets and regulatory liabilities that exist but do not meet the recognition criteria

PART V

# Worked Illustration

*Applying the recognition, measurement and presentation requirements to a simple timing-difference scenario*



## ILLUSTRATION

# An Under-Recovery of Input Costs

### FACT PATTERN (BASED ON IFRS 20, PARAGRAPH 16)

In Year 1 (20X1), an entity's regulated rate is set using estimated input costs of \$100. Applying IFRS 15, the entity recognises revenue of \$100 for 20X1, based on those estimated costs.

However, the entity's actual input costs for 20X1 were \$120 – a \$20 under-recovery relative to what was billed to customers.

The regulatory agreement gives the entity an enforceable present right to add the resulting \$20 under-recovery in determining the regulated rate to be charged to customers in 20X2.

Required: How should the entity account for this timing difference under IFRS 20 in 20X1 and 20X2? (Regulatory interest is ignored for simplicity.)



# Solution

| Reporting Period | Accounting Treatment                                                                                                                                                                                                                               |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 20X1             | IFRS 15 revenue of \$100 is recognised. A \$20 regulatory asset is recognised, reflecting the enforceable right to recover the under-recovered costs – with a corresponding \$20 of regulatory income. Total revenue presented: \$120.             |
| 20X2             | The \$20 is billed to customers and included in IFRS 15 revenue. The \$20 regulatory asset is derecognised, with a corresponding \$20 of regulatory expense reversing the earlier income. Net effect on total revenue in 20X2: nil from this item. |

# Key Takeaways

## Effective 2029



Mandatory for periods beginning on or after 1 January 2029; early application permitted

## Two-Part Scope Test



A regulatory agreement, plus a timing difference in when compensation is charged

## Total Allowed Compensation



The core principle: recognise it in the period the goods or services are supplied

## Discounted Cash Flow Measurement



Future cash flows discounted at the regulatory interest rate, updated each period

## Presented Within Revenue



Regulatory income and expense sit alongside IFRS 15 revenue in profit or loss

## Extensive Disclosure



Reconciliations, maturity analysis and unrecognised balances are all required

## ABOUT THE AUTHOR

# A Career Built on Making IFRS Understandable



## B D Chatterjee

FCA · ACMA · ACS · DipIFR (ACCA UK)

*Teacher and Mentor to finance professionals worldwide*

B D Chatterjee is a Chartered Accountant and financial thought leader with over 35 years of global experience spanning corporate finance, accounting standards, financial reporting, business valuation and financial due diligence. As a seasoned CFO, he has led finance functions across major corporations and now heads Digital CFO Solutions, a platform delivering institutional-grade IFRS, US GAAP and valuation workbooks alongside fractional CFO services.



### Published Author

Author of the Pocketbook of IFRS series and other finance titles.



### Guided Thousands

Through IFRS, US GAAP and valuation transitions worldwide.



### Institutional-Grade Platforms

Excel-based CFO workbooks used by finance teams globally.

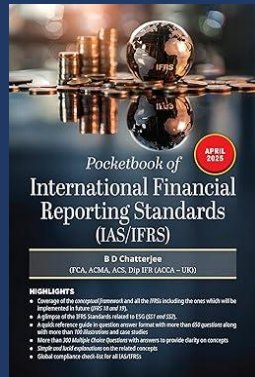


### Digital CFO Solutions

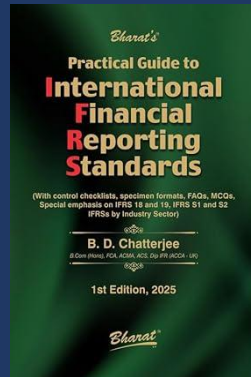
Institutional-grade workbooks, fractional CFO advisory, and published finance literature.

## ABOUT THE AUTHOR

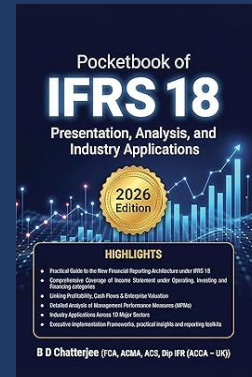
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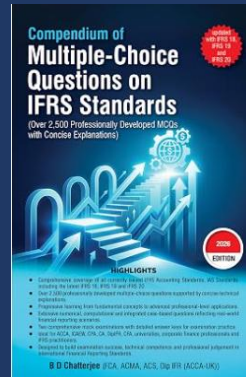
Pocketbook of International Financial Reporting Standards (IAS/IFRS)



Practical Guide to International Financial Reporting Standards



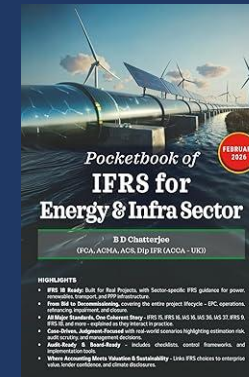
Pocketbook of IFRS 18 — Presentation, Analysis & Industry Applications



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