Electricity Ashburton Limited, trading as EA Networks

Default Price-Quality Path

Annual Compliance Statement

1 April 2021 – 31 March 2022 Assessment Period

19 August 2022

Contents

1. Introduction

Electricity Ashburton Limited, trading as EA Networks (EA Networks) is subject to price-quality regulation under Part 4 of the Commerce Act 1986. The Commerce Commission has set a Default Price-Quality Path (DPP) which applies to EA Networks from 1 April 2020.

This annual compliance statement is published in accordance with clause 11.4 of the Electricity Distribution Services Default Price-Quality Path Determination 2020 [2019] NZCC 21 (2020 DPP Determination), and applies to the second assessment period, commencing 1 April 2021 and ending 31 March 2022.

2. Date prepared

This statement was prepared on 19 August 2022.

3. Wash-up amount

3.1 Statement of compliance

EA Networks has complied with the requirements of the 2020 DPP Determination in respect of the wash-up amount calculation.

3.2 Wash-up amount calculation

Table 1

Wash-up amount RY22		
Term	Description	Value ($000)
Actual allowable revenue (AAR)	*Sum of actual net allowable revenue, actual pass-through and recoverable costs, pass-through balance and revenue wash-up draw down amount*	42,456
Actual revenue (AR)	*Sum of actual revenue from prices plus other regulated income*	41,384
Revenue foregone (RV)	*Actual net allowable revenue x (revenue reduction percentage - 20%) when revenue reduction percentage is greater than 20%, otherwise nil*	-
Wash-up amount	*AAR - AR - RV*	**1,072**

Further information supporting actual allowable revenue is included in Section 3.2.1.

Further information supporting actual revenue is included in Section 3.2.2.

Further information supporting revenue foregone is included in Section 3.2.3.

3.2.1 Actual allowable revenue

Sections 3.2.1.1 to 3.2.3 shows the calculation of actual allowable revenue.

3.2.1.1 Calculation of net allowable revenue

Table 2 shows the calculation of actual net allowable revenue consistent with Schedule 1.6 of the 2020 DPP Determination.

Table 2

Net allowable revenue		
Term	Description	Value ($000)
Actual net allowable revenue (ANAR) from the first assessment period	*Forecast net allowable revenue for the assessment period ended 31 March 2021. From table 1.4.1 of the 2020 DPP Determination*	33,259
ΔCPI	*Is the derived change in the CPI to be applied for the assessment period*	5.30%
X	*The annual rate of change as specified in schedule 1.2 of the 2020 DPP Determination*	0.00%
Actual net allowable revenue	***ANARprevious*(1+ΔCPIt)*(1-X)***	**35,021**

Further information supporting the calculation of ΔCPI is found in Appendix A.

3.2.1.2 Total actual allowable revenue

Table 3 below shows the actual allowable revenue for the assessment period consistent with Schedule 1.6 of the 2020 DPP Determination.

Table 3

Total allowable revenue for RY22		
Term	Description	Value ($000)
Actual net allowable revenue (ANAR)	*Amount calculated in accordance with schedule 1.6 of the determination*	35,021
Actual pass-through costs	*Sum of all pass-through costs that were incurred or approved by the Commission in the assessment period*	406
Actual recoverable costs	*Sum of all recoverable costs that were incurred or approved by the Commission in the assessment period*	7,029
Actual allowable revenue (AAR)	*Actual net allowable revenue + actual pass-through costs and actual recoverable costs*	**42,456**

Further information supporting actual pass-through costs, actual recoverable costs and the pass-through balance is included in Appendix B.

3.2.2 Actual revenue

Table 4 below shows actual revenue for the assessment period consistent with clause 4.2 of the 2020 DPP Determination.

Table 4

Actual revenue RY22		
Term	Description	Value ($000)
Actual revenue from prices[1]	*Prices applied between 1 April 2021 and 31 March 2022 multiplied by actual quantities for the assessment period*	41,405
Other regulated income	*Other income associated with supply of electricity distribution services*	(21)
Total actual revenue (AR)	*Sum of actual revenue from prices plus other regulated income*	**41,384**

Further information supporting actual revenue from prices is included in Appendix C.

[1] Refer to Appendix C

3.2.3 Revenue foregone

Table 5 below shows the revenue foregone consistent with clause 4.2 of the 2020 DPP Determination.

Table 5

Revenue foregone RY22		
Term	Description	Value ($000)
Actual revenue from prices	*Price applied between 1 April 2021 and 31 March 2022 multiplied by actual quantities for the assessment period*	41,405
Forecast revenue from prices	*Amount defined in the price setting compliance statement for second assessment period*	41,268
Revenue reduction percentage (RRP)	*1 - (actual revenue from prices / forecast revenue from prices)*	**(0.33%)**
Actual net allowable revenue (ANAR)	*Amount specified as forecast net allowable revenue for the first assessment period*	35,021
Revenue foregone (RV)	*Actual net allowable revenue x (RRP- 20%) when RRP is greater than 20%, otherwise nil*	**-**

4. Quality standards

4.1 Statement of compliance with planned interruptions quality standards

EA Networks is subject to a planned accumulated SAIDI limit and a planned accumulated SAIFI limit which are assessed for the DPP regulatory period as stated in clause 9.2 of the 2020 DPP Determination.

Table 6 and Table 7 below show the planned accumulated SAIDI and SAIFI limits for EA Networks for the DPP regulatory period and the planned SAIDI and SAIFI assessed values for the second assessment period.

Table 6

Planned interruptions quality standard - SAIDI	
Sum of planned SAIDI assessed values ≤ Planned accumulated SAIDI limit	
Planned accumulated SAIDI limit	1,376.08
Planned SAIDI assessed value for the first assessment period	100.12
Planned SAIDI assessed value for the second assessment period	106.64
Sum of planned assessed values	**206.76**
Compliance result	**Compliant**

Table 7

Planned interruptions quality standard - SAIFI	
Sum of planned SAIFI assessed values ≤ Planned accumulated SAIFI limit	
Planned accumulated SAIFI limit	4.8939
Planned SAIFI assessed value for the first assessment period	0.3162
Planned SAIFI assessed value for the 2nd assessment period	0.3635
Sum of planned SAIFI assessed values	**0.6797**
Compliance result	**Compliant**

Further information supporting planned SAIDI and SAIFI assessed values is included in Section 4.1.1.

4.1.1 Planned SAIDI and SAIFI assessed values

Table 8 and Table 9 below show EA Networks' planned SAIDI and SAIFI assessed values for the assessment period.

Table 8

Planned SAIDI assessed value RY22		
Term	Description	Value
Class B non-notified interruptions		106.64
Class B notified interruptions falling outside window		0.00
$SAIDI_B$	*Sum of Class B non-notified interruptions*	**106.64**
Class B notified interruptions falling inside window		0.00
Class B intended interruptions cancelled without notice		0.00
Class B intended interruptions cancelled with notice		0.00
$SAIDI_N$	*Sum of Class B notified interruptions*	**0.00**
Planned SAIDI assessed value	$SAIDI_B + (SAIDI_N/2)$	**106.64**

Table 9

Planned SAIFI assessed value RY22		
Term	Description	Value
Planned SAIFI assessed value	*Sum of Class B interruptions commencing within the assessment period*	0.3635

4.2 Statement of compliance with unplanned interruptions quality standards

As demonstrated in Table 10 and Table 11 below, and consistent with clause 9.7 of the 2020 DPP Determination, EA Networks has complied with the unplanned interruptions quality standard.

Table 10

Unplanned interruptions quality standard RY22 - SAIDI		
Unplanned SAIDI assessed value ≤ Unplanned SAIDI limit		
Unplanned SAIDI limit		91.98
Unplanned SAIDI assessed value	*Sum of normalised SAIDI values for Class C interruptions commencing within the assessment period*	61.31
Compliance result		**Compliant**

Table 11

Unplanned interruptions quality standard RY22 - SAIFI		
Unplanned SAIFI assessed value ≤ Unplanned SAIFI limit		
Unplanned SAIFI limit		1.2826
Unplanned SAIFI assessed value	*Sum of normalised SAIFI values for Class C interruptions commencing within the assessment period*	0.9762
Compliance result		**Compliant**

Information about policies, procedures and calculations for measuring planned and unplanned interruptions during the assessment period is in Appendix D.

4.2.1 Major events

Table 12 and Table 13 below show the SAIDI and SAIFI values attributed to major events which occurred during the assessment period.

Further information about major events is included in Appendix E.

Table 12

Unplanned SAIDI major events RY22					
Start	End	Pre-normalised unplanned SAIDI	Normalised unplanned SAIDI	Cause of the event	Event
29-05-2021:17:30	31-05-2021:20:30	19.33	1.56	Severe rain & flooding	1
09-09-2021: 2:30	11-09-2021: 4:00	37.97	1.45	Severe wind	2
11-09-2021: 16:30	13-09-2021:19:30	15.29	1.79	Severe wind	3

Table 13

Unplanned SAIFI major events RY22					
Start	End	Pre-normalised unplanned SAIFI	Normalised unplanned SAIFI	Cause of the event	Event
06-04-2021: 23:30	08-04-2021: 19:30	0.0775	0.0046	Human error	4
13-04-2021:15.00	14-04-2021: 20:30	0.0730	0.0027	Human error	5
10-05-2021: 17:30	12-05-2021: 16:30	0.0942	0.0017	Defective equipment	6
03-06-2021: 10:00	05-06-2021: 09:00	0.2545	0:0030	Vehicle accident	7
09-09-2021: 03:30	11-09-2021: 02:30	0.1155	0.0157	Severe Wind	8
27-10-2021: 12:00	29-10-2021: 11:00	0.0922	0.0061	Human error	9

4.3 Statement of compliance with extreme event standard

As demonstrated in Table 14 below, and consistent with clause 9.9 of the 2020 DPP Determination EA Networks has complied with the extreme event standard.

Table 14

Extreme event standard RY22	
Unplanned SAIDI value ≤ 120 minutes, and customer interruption minutes ≤ six million during any 24-hour period, excluding unplanned interruptions from major external factors	
Number of extreme events	0
Compliance result	**Compliant**

4.4 Quality Incentive Adjustment

Table 15 below shows EA Networks' quality incentive adjustment for the assessment period.

Table 15

Quality Incentive Adjustment RY22		
Term	Description	Value ($000)
SAIDI planned adjustment	*$(SAIDI_{planned, target} - SAIDI_{planned, assessed}) \times 0.5 \times IR$*	(40)
SAIDI unplanned adjustment	*$(SAIDI_{unplanned, target} - SAIDI_{unplanned, assessed}) \times IR$*	56
Total adjustment	*SAIDI planned adjustment + SAIDI unplanned adjustment*	**16**
Revenue at risk	*0.02 * ANAR*	700.42
Total penalty/reward		16
67th percentile estimate of post-tax WACC		4.23%
Quality incentive adjustment		**17**

Table 16 below shows EA Networks' quality incentive adjustment inputs consistent with Schedule 4 of the 2020 DPP Determination.

Table 16

Quality Incentive Adjustment Inputs RY22					
Term	Units	Value	Term	Units	Value
SAIDI planned interruption cap	minutes	275.22	SAIDI unplanned interruption cap	minutes	91.98
SAIDI planned interruption collar	minutes	-	SAIDI unplanned interruption collar	minutes	-
SAIDI planned interruption target	minutes	91.74	SAIDI unplanned interruption target	minutes	71.65
Planned SAIDI assessed value	minutes	106.64	Unplanned SAIDI assessed value	minutes	61.31
Incentive rate		5,394			
Actual net allowable revenue (ANAR)	$000	35,021			
SAIDI planned interruption target	minutes	92	SAIDI unplanned interruption target	minutes	72
Minimum of the planned SAIDI cap and assessed value	minutes	107	Minimum of the unplanned SAIDI cap and assessed value	minutes	61
Planned SAIDI subject to incentive	minutes	(15)	Unplanned SAIDI subject to incentive	minutes	11
Adjustment (IR x 0.5)	$	2,697	Adjustment (IR)	$	5,394
SAIDI planned adjustment	$000	(40)	SAIDI planned adjustment	$000	56

5. Transactions

EA Networks has not entered into any agreements with another EDB or Transpower for an amalgamation, merger, major transaction or transfer in the assessment period.

6. Director's certification

A Director's certificate in the form set out in Schedule 7 of the 2020 DPP Determination is included as Appendix F.

7. Assurance report

An assurance report meeting the requirements of Schedule 8 of the 2020 DPP Determination is included in Appendix G.

Appendix A – Calculation of ΔCPI

ΔCPI			
CPI calculation	$\Delta CPI = \frac{CPI_{Jun,t-1}+CPI_{Sept,t-1}+CPI_{Dec,t-1}+CPI_{Mar,t}}{CPI_{Jun,t-2}+CPI_{Sept,t-2}+CPI_{Dec,t-2}+CPI_{Mar,t-1}} - 1$ Where t is the year in which the assessment period ends		
$CPI_{Jun,t-1}$	*1,082*	$CPI_{Jun,t-2}$	1,047
$CPI_{Sept,t-1}$	*1,106*	$CPI_{Sept,t-2}$	1,054
$CPI_{Dec,t-1}$	*1,122*	$CPI_{Dec,t-2}$	1,059
$CPI_{Mar,t}$	*1,142*	$CPI_{Mar,t-1}$	1,068
Total	***4,452***	**Total**	**4,228**
ΔCPI =			5.30%

Appendix B – Pass-through and recoverable costs

Pass-through costs

Table 18

Actual and forecast pass-through costs RY22				
Actual pass-through costs	Actual ($000)	Forecast ($000)	Forecast variance ($000)	Explanation for variances
Rates on system fixed assets	207	202	5	A rates increase was allowed for, using the Ashburton District Council 10-year plan to forecast the value of the increase. The actual increase was higher than what the 10-year forecast stated.
Commerce Act levies	91	84	7	The forecast was based on actual Commerce Commission cost plus an inflation adjustment. The actual movement was higher than the inflation adjustment
Electricity Authority levies	96	100	(4)	The forecast was based on prior years' known data, which was increased by inflation. Actual costs were lower than the forecast cost.
Utilities Disputes levies	12	11	1	
Total actual pass-through costs	**406**	**397**	**9**	**Overall, the variance is 2.3% of total actual pass-through costs**

Recoverable costs

Table 19

Actual and forecast recoverable costs RY22				
Actual recoverable costs	Actual ($000)	Forecast ($000)	Forecast variance ($000)	Explanation for variances
IRIS incentive adjustment	(1,195)	(1,228)	33	Formula error in the Commerce Commission spreadsheet.
Transmission charges	4,557	4,556	1	
New investment contract charges	3,137	3,179	(42)	Transpower advised EA Networks what the required new investment payments would be for the 2021-22 year. EA Networks used this number plus an allowance to make a one-off additional payment to calculate the forecast. A slightly lower than planned additional payment was made in the 2021-22 year.
System operator services charges	-	-	-	
Avoided transmission charges	-	-	-	
Distributed generation allowance	-	-	-	
Claw-back	-	-	-	
Catastrophic event allowance	-	-	-	
Extended reserves allowance	-	-	-	
Quality incentive adjustment	(19)	(19)	-	
Capex wash-up adjustment	502	502	-	
Reconsideration event allowance	-	-	-	
Quality standard variation engineers fee	-	-	-	
Urgent project allowance	-	-	-	
Fire and Emergency NZ levies	47	63	(16)	EA Networks changed its approach to insuring building during the year, which decrease the fire and emergency levy payable.
Innovation project allowance	-	-	-	
Total actual recoverable costs	**7,029**	**7,053**	**(24)**	**Total actual cost is in line with forecasted recoverable costs**

Appendix C – Prices and quantities

Table 20 shows the actual prices and quantities for actual revenue from prices for the second assessment period.

Table 20

Actual Revenue from Prices (FRFP)			FY2022 Delivery Prices		FY2022 Actual Quantities	Days applicable	Price x Quantity	Budget Quantities	Variation
General Supplies							($000)		($000)
Fixed Charges									
GS05	General Supply - less than 5 kVA	GS05	0.5183	$/con/day	49.1 cons	365 days	9	43.0 cons	1
GS20	General Supply - 20 kVA	GS20	0.1500	$/con/day	15,812.8 cons	365 days	866	15,425.0 cons	21
GS50	General Supply - 50 kVA	GS50	0.3000	$/con/day	1,700.7 cons	365 days	186	1,659.0 cons	5
G100	General Supply - 100 kVA	G100	0.6000	$/con/day	713.4 cons	365 days	156	714.0 cons	(0)
G150	General Supply - 150 kVA	G150	0.9000	$/con/day	294.5 cons	365 days	97	297.0 cons	(1)
Volume charges									
All GS	Uncontrolled	GUEN	0.0776	$/kWh	227,812.4 MWh		17,678	225,185.4 MWh	204
All GS	Controlled 16	GCOP	0.0160	$/kWh	31,770.7 MWh		508	31,221.2 MWh	9
All GS	Night Boost	G10N	0.0160	$/kWh	784.8 MWh		13	662.9 MWh	2
All GS	Night only	GNEN	0.0000	$/kWh	4,520.3 MWh		-	3,933.8 MWh	-
All GS	Embedded Generation Export kWh	GEDG	0.0000	$/kWh	667.4 MWh		-	290.8 MWh	-
All GS	Embedded Generation Generation Credit	GUDG	0.0000	$/kWh	54.0 MWh		-	185.5 MWh	-
Other charges									
All GS	Unmetered Streetlighting	MCSL	0.1907	$/fitting/day	12.4 fittings	365 days	1	0.0 fittings	1
All GS	Floodlight - Closed	MCRF	0.2819	$/fitting/day	5.0 fittings	365 days	1	2.0 fittings	0
All GS	Under Verandah - Closed	MCRU	0.2482	$/fitting/day	12.7 fittings	365 days	1	8.0 fittings	0
Irrigation									
All irrigation	Chargeable kW	ISCH	0.3560	$/kW/day	140,067.2 kW	365 days	18,200	140,258.0 kW	(25)
	Energy	IUEN	0.0000	$/kWh	179,520 MWh		-	230,661 MWh	-
ISCM	Irrigation Managed Trial	ISMR	(0.1000)	$/kW/day	47.8 kW	365 days	(2)	89.0 kW	2
ISCF	Irrigation Harmonic Penalty	ISCF	0.4560	$/kW/day	874.0 kW	365 days	145	1,133.0 kW	(43)
Industrial									
ICMD	Anytime Demand kVA	ICMD	0.3297	$/kVA/day	11,165.7 kVA	365 days	1,344	10,998.0 kVA	20
ICDYMD	Day Demand kVA	ICDYMD	0.3297	$/kVA/day	785.0 kVA	365 days	94	824.0 kVA	(5)
	Anytime Demand kVA	ICDYAD	0.0000	$/kVA/day	0.0 kVA	365 days	-	830.0 kVA	-
ICDPD	Peak Demand	ICDPD	0.0700	$/kVA/day	2,513.5 kVA	365 days	64	2,560.0 kVA	(1)
	Anytime Demand	ICDAM	0.2597	$/kVA/day	2,790.5 kVA	365 days	265	2,735.0 kVA	5
All Industrial	Uncontrolled, Day & Night Energy	IEMD, IEDS,ICEN, IDEN, INEN	0.0000	$/kWh	67,642 MWh		-	65,572 MWh	-
Other supplies									
Large user									
LUCM	ANZCO Seafield Plant	LUCM	694.2752	$/day	1.0 cons	365 days	253	1.0 cons	-
	Energy	LECM	0.0000	$/kWh	35,272 MWh		-	30,052 MWh	-
	Maximum demand	LMCM	0.0759	$/kVA/day	6,808.1 kVA	365 days	189	5,112.0 kVA	47
LUPP	Talley's Fairfield Plant	LUPP	97.3677	$/day	1.0 cons	365 days	36	1.0 cons	-
	Energy	LEPP	0.0000	$/kWh	2,465 MWh		-	3,299 MWh	-
	Maximum demand	LMPP	0.0768	$/kVA/day	476.0 kVA	365 days	13	419.0 kVA	2
LUMH	Mt Hutt Ski Area	LUMH	334.2198	$/day	1.0 cons	365 days	122	1.0 cons	-
	Energy	LEMH	0.0000	$/kWh	2,023 MWh		-	2,855 MWh	-
	Maximum demand	LMMH	0.0601	$/kVA/day	907.3 kVA	365 days	20	1,329.0 kVA	(9)
LUHP	Highbank Pumps	LUHP	0.1375	$/kW/day	9,600.0 kW	365 days	482	9,600.0 kW	-
	Energy	LEHP	0.0000	$/kWh	1,448 MWh		-	8,516 MWh	-
Generation									
LUHB	Highbank	LUHB	933.2564	$/day	1.0 cons	365 days	341	1.0 cons	-
	Energy	LEHB	0.0000	$/kWh	116,022 MWh		-	51,720 MWh	-
LUMO	Montalto	LUMO	95.6663	$/day	1.0 cons	365 days	35	1.0 cons	-
	Energy	LEMO	0.0000	$/kWh	9,651 MWh		-	9,732 MWh	-
LUCD	Cleardale	LUCD	69.5061	$/day	1.0 cons	365 days	25	1.0 cons	-
	Energy	LECD	0.0000	$/kWh	3,860 MWh		-	3,173 MWh	-
LULN	Lavington	LULN	19.2526	$/day	1.0 cons	365 days	7	1.0 cons	-
	Energy	LELN	0.0000	$/kWh	3,134 MWh		-	1,282 MWh	-
Streetlighting									
MCSL	Street Lighting	MCSL	0.1907	$/fixture/day	3,667.0 fittings	365 days	255	3,609.0 fittings	4
							41,405		**239**

New connection revenue was included in price setting DPP compliance statement but shouldn't have been - as a result, revenue from prices is $102,418 lower

Table 21 shows the forecast revenue from prices for the second assessment period from the price setting compliance statement.

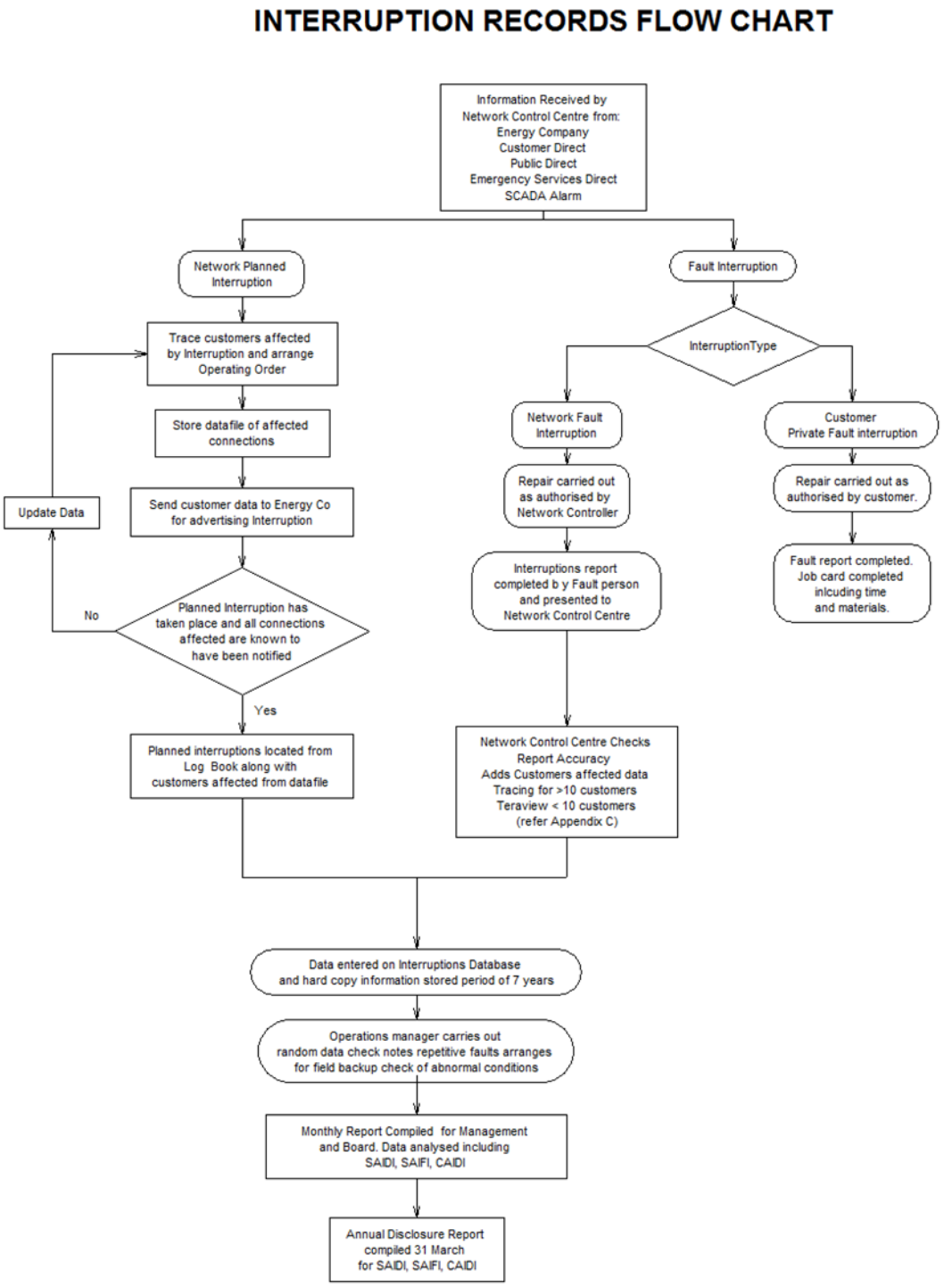
Table 21

Forecast revenue from prices RY22	
Total forecast revenue from prices	41,268

Appendix D – Policies and procedures for measuring planned and unplanned interruptions

1 EA Networks' Control Centre is responsible for managing the operation of the electricity network and as such is responsible for recording all interruptions both planned and unplanned. The policies and procedures for carrying out this task are documented in the document labelled "Procedure: Network Interruption Records". During the year EA Networks recorded no 'notified interruptions'.

2 The procedures are summarised by following flow chart:



Appendix E – SAIDI and SAIFI major events

The tables below show the normalisation of the SAIDI and SAIFI major events that took place during the assessment period, consistent with Schedule 3.2 of the 2020 DPP Determination.

Table 21

Normalisation of unplanned SAIDI major events RY22						
SAIDI unplanned boundary value						**6.25**
1/48th of the SAIDI unplanned boundary value	29/05/2021 17:30 (event 1)			9/09/2021 2:30 (event 2)		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.13	05:30 PM	0.00	0.00	02:30 AM	0.00	0.00
0.13	06:00 PM	0.00	0.00	03:00 AM	0.00	0.00
0.13	06:30 PM	0.00	0.00	03:30 AM	0.00	0.00
0.13	07:00 PM	0.00	0.00	04:00 AM	0.00	0.00
0.13	07:30 PM	0.00	0.00	04:30 AM	0.00	0.00
0.13	08:00 PM	0.00	0.00	05:00 AM	0.00	0.00
0.13	08:30 PM	0.00	0.00	05:30 AM	0.00	0.00
0.13	09:00 PM	0.00	0.00	06:00 AM	0.00	0.00
0.13	09:30 PM	0.00	0.00	06:30 AM	0.00	0.00
0.13	10:00 PM	0.56	0.13	07:00 AM	0.00	0.00
0.13	10:30 PM	0.00	0.00	07:30 AM	0.00	0.00
0.13	11:00 PM	0.00	0.00	08:00 AM	0.00	0.00
0.13	11:30 PM	0.10	0.10	08:30 AM	0.00	0.00
0.13	12:00 AM	0.00	0.00	09:00 AM	0.00	0.00
0.13	12:30 AM	0.00	0.00	09:30 AM	0.00	0.00
0.13	01:00 AM	0.00	0.00	10:00 AM	0.00	0.00
0.13	01:30 AM	0.00	0.00	10:30 AM	0.00	0.00
0.13	02:00 AM	0.00	0.00	11:00 AM	0.00	0.00
0.13	02:30 AM	0.00	0.00	11:30 AM	0.00	0.00
0.13	03:00 AM	0.00	0.00	12:00 PM	0.00	0.00
0.13	03:30 AM	0.00	0.00	12:30 PM	0.00	0.00
0.13	04:00 AM	0.00	0.00	01:00 PM	0.00	0.00
0.13	04:30 AM	0.00	0.00	01:30 PM	0.00	0.00
0.13	05:00 AM	0.00	0.00	02:00 PM	0.00	0.00
0.13	05:30 AM	0.00	0.00	02:30 PM	0.00	0.00
0.13	06:00 AM	0.00	0.00	03:00 PM	0.00	0.00
0.13	06:30 AM	0.00	0.00	03:30 PM	0.00	0.00
0.13	07:00 AM	0.00	0.00	04:00 PM	0.00	0.00
0.13	07:30 AM	0.00	0.00	04:30 PM	0.00	0.00
0.13	08:00 AM	0.21	0.13	05:00 PM	0.00	0.00
0.13	08:30 AM	0.00	0.00	05:30 PM	0.00	0.00
0.13	09:00 AM	0.00	0.00	06:00 PM	0.00	0.00
0.13	09:30 AM	0.19	0.13	06:30 PM	0.00	0.00
0.13	10:00 AM	0.00	0.00	07:00 PM	0.22	0.13

Normalisation of unplanned SAIDI major events RY22						
SAIDI unplanned boundary value						**6.25**
1/48th of the SAIDI unplanned boundary value	29/05/2021 17:30 (event 1, continued)			9/09/2021 2:30 (event 2, continued)		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.13	10:30 AM	0.00	0.00	07:30 PM	0.00	0.00
0.13	11:00 AM	0.00	0.00	08:00 PM	0.00	0.00
0.13	11:30 AM	0.00	0.00	08:30 PM	0.00	0.00
0.13	12:00 PM	0.00	0.00	09:00 PM	0.00	0.00
0.13	12:30 PM	0.42	0.13	09:30 PM	0.00	0.00
0.13	01:00 PM	0.00	0.00	10:00 PM	0.06	0.06
0.13	01:30 PM	0.41	0.13	10:30 PM	0.00	0.00
0.13	02:00 PM	0.00	0.00	11:00 PM	0.00	0.00
0.13	02:30 PM	0.00	0.00	11:30 PM	0.00	0.00
0.13	03:00 PM	0.00	0.00	12:00 AM	0.00	0.00
0.13	03:30 PM	0.00	0.00	12:30 AM	0.00	0.00
0.13	04:00 PM	0.00	0.00	01:00 AM	0.00	0.00
0.13	04:30 PM	0.00	0.00	01:30 AM	0.00	0.00
0.13	05:00 PM	6.38	0.13	02:00 AM	10.55	0.13
0.13	05:30 PM	0.00	0.00	02:30 AM	2.36	0.13
0.13	06:00 PM	0.00	0.00	03:00 AM	14.15	0.13
0.13	06:30 PM	0.00	0.00	03:30 AM	2.81	0.13
0.13	07:00 PM	0.00	0.00	04:00 AM	0.00	0.00
0.13	07:30 PM	0.00	0.00	04:30 AM	2.21	0.13
0.13	08:00 PM	0.00	0.00	05:00 AM	0.00	0.00
0.13	08:30 PM	0.00	0.00	05:30 AM	0.00	0.00
0.13	09:00 PM	8.65	0.13	06:00 AM	0.00	0.00
0.13	09:30 PM	0.00	0.00	06:30 AM	0.79	0.13
0.13	10:00 PM	0.00	0.00	07:00 AM	0.00	0.00
0.13	10:30 PM	0.00	0.00	07:30 AM	0.00	0.00
0.13	11:00 PM	0.00	0.00	08:00 AM	0.00	0.00
0.13	11:30 PM	0.00	0.00	08:30 AM	0.09	0.09
0.13	12:00 AM	0.00	0.00	09:00 AM	0.57	0.13
0.13	12:30 AM	0.00	0.00	09:30 AM	1.74	0.13
0.13	01:00 AM	0.00	0.00	10:00 AM	0.00	0.00
0.13	01:30 AM	1.69	0.13	10:30 AM	0.00	0.00
0.13	02:00 AM	0.00	0.00	11:00 AM	0.00	0.00
0.13	02:30 AM	0.00	0.00	11:30 AM	0.00	0.00
0.13	03:00 AM	0.00	0.00	12:00 PM	0.00	0.00
0.13	03:30 AM	0.00	0.00	12:30 PM	0.00	0.00
0.13	04:00 AM	0.00	0.00	01:00 PM	2.41	0.13
0.13	04:30 AM	0.00	0.00	01:30 PM	0.00	0.00
0.13	05:00 AM	0.00	0.00	02:00 PM	0.00	0.00
0.13	05:30 AM	0.00	0.00	02:30 PM	0.00	0.00

Normalisation of unplanned SAIDI major events RY22						
SAIDI unplanned boundary value						**6.25**
1/48th of the SAIDI unplanned boundary value	29/05/2021 17:30 (event 1)			9/09/2021 2:30 (event 2)		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.13	06:00 AM	0.00	0.00	03:00 PM	0.00	0.00
0.13	06:30 AM	0.00	0.00	03:30 PM	0.00	0.00
0.13	07:00 AM	0.00	0.00	04:00 PM	0.00	0.00
0.13	07:30 AM	0.00	0.00	04:30 PM	0.00	0.00
0.13	08:00 AM	0.00	0.00	05:00 PM	0.00	0.00
0.13	08:30 AM	0.00	0.00	05:30 PM	0.00	0.00
0.13	09:00 AM	0.00	0.00	06:00 PM	0.00	0.00
0.13	09:30 AM	0.24	0.13	06:30 PM	0.00	0.00
0.13	10:00 AM	0.00	0.00	07:00 PM	0.00	0.00
0.13	10:30 AM	0.29	0.13	07:30 PM	0.00	0.00
0.13	11:00 AM	0.00	0.00	08:00 PM	0.00	0.00
0.13	11:30 AM	0.00	0.00	08:30 PM	0.00	0.00
0.13	12:00 PM	0.00	0.00	09:00 PM	0.00	0.00
0.13	12:30 PM	0.00	0.00	09:30 PM	0.00	0.00
0.13	01:00 PM	0.02	0.02	10:00 PM	0.00	0.00
0.13	01:30 PM	0.16	0.13	10:30 PM	0.00	0.00
0.13	02:00 PM	0.00	0.00	11:00 PM	0.00	0.00
0.13	02:30 PM	0.00	0.00	11:30 PM	0.00	0.00
0.13	03:00 PM	0.00	0.00	12:00 AM	0.00	0.00
0.13	03:30 PM	0.00	0.00	12:30 AM	0.00	0.00
0.13	04:00 PM	0.00	0.00	01:00 AM	0.00	0.00
0.13	04:30 PM	0.00	0.00	01:30 AM	0.00	0.00
0.13	05:00 PM	0.00	0.00	02:00 AM	0.00	0.00
0.13	05:30 PM	0.00	0.00	02:30 AM	0.00	0.00
0.13	06:00 PM	0.00	0.00	03:00 AM	0.00	0.00
0.13	06:30 PM	0.00	0.00	03:30 AM	0.00	0.00
0.13	07:00 PM	0.00	0.00	04:00 AM	0.00	0.00
0.13	07:30 PM	0.00	0.00			
0.13	08:00 PM	0.00	0.00			
0.13	08:30 PM	0.00	0.00			
Total		**19.33**	**1.56**		**37.97**	**1.45**

Normalisation of unplanned SAIDI major events RY22						
SAIDI unplanned boundary value						6.25
1/48th of the SAIDI unplanned boundary value	11/09/2021 16:30 (event 3)			11/09/2021 16:30 (event 3)		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.13	04:30 PM	0.00	0.00	06:30 PM	0.00	0.00
0.13	05:00 PM	0.00	0.00	07:00 PM	0.00	0.00
0.13	05:30 PM	0.00	0.00	07:30 PM	0.34	0.13
0.13	06:00 PM	0.00	0.00	08:00 PM	2.18	0.13
0.13	06:30 PM	0.00	0.00	08:30 PM	0.24	0.13
0.13	07:00 PM	0.00	0.00	09:00 PM	0.00	0.00
0.13	07:30 PM	0.00	0.00	09:30 PM	0.00	0.00
0.13	08:00 PM	0.00	0.00	10:00 PM	0.00	0.00
0.13	08:30 PM	0.00	0.00	10:30 PM	0.83	0.13
0.13	09:00 PM	0.35	0.13	11:00 PM	1.47	0.13
0.13	09:30 PM	0.00	0.00	11:30 PM	0.00	0.00
0.13	10:00 PM	0.00	0.00	12:00 AM	0.00	0.00
0.13	10:30 PM	0.00	0.00	12:30 AM	0.00	0.00
0.13	11:00 PM	0.00	0.00	01:00 AM	0.00	0.00
0.13	11:30 PM	0.00	0.00	01:30 AM	0.00	0.00
0.13	12:00 AM	0.00	0.00	02:00 AM	0.00	0.00
0.13	12:30 AM	0.00	0.00	02:30 AM	0.00	0.00
0.13	01:00 AM	0.00	0.00	03:00 AM	0.00	0.00
0.13	01:30 AM	0.00	0.00	03:30 AM	0.00	0.00
0.13	02:00 AM	0.00	0.00	04:00 AM	0.00	0.00
0.13	02:30 AM	0.00	0.00	04:30 AM	0.00	0.00
0.13	03:00 AM	0.00	0.00	05:00 AM	0.00	0.00
0.13	03:30 AM	0.00	0.00	05:30 AM	0.00	0.00
0.13	04:00 AM	0.00	0.00	06:00 AM	0.42	0.13
0.13	04:30 AM	0.00	0.00	06:30 AM	0.00	0.00
0.13	05:00 AM	0.00	0.00	07:00 AM	0.00	0.00
0.13	05:30 AM	0.00	0.00	07:30 AM	0.03	0.03
0.13	06:00 AM	0.00	0.00	08:00 AM	0.00	0.00
0.13	06:30 AM	0.00	0.00	08:30 AM	0.53	0.13
0.13	07:00 AM	0.00	0.00	09:00 AM	0.00	0.00
0.13	07:30 AM	0.00	0.00	09:30 AM	0.00	0.00
0.13	08:00 AM	0.00	0.00	10:00 AM	0.15	0.13
0.13	08:30 AM	0.00	0.00	10:30 AM	0.00	0.00
0.13	09:00 AM	0.00	0.00	11:00 AM	0.00	0.00
0.13	09:30 AM	0.00	0.00	11:30 AM	0.00	0.00
0.13	10:00 AM	0.00	0.00	12:00 PM	0.00	0.00
0.13	10:30 AM	0.00	0.00	12:30 PM	0.00	0.00
0.13	11:00 AM	0.00	0.00	01:00 PM	0.00	0.00
0.13	11:30 AM	0.00	0.00	01:30 PM	0.00	0.00
0.13	12:00 PM	0.00	0.00	02:00 PM	0.00	0.00
0.13	12:30 PM	0.00	0.00	02:30 PM	0.00	0.00

Normalisation of unplanned SAIDI major events RY22						
SAIDI unplanned boundary value						**6.25**
1/48th of the SAIDI unplanned boundary value	11/09/2021 16:30 (event 3)			11/09/2021 16:30 (event 3)		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.13	01:00 PM	0.00	0.00	03:00 PM	0.00	0.00
0.13	01:30 PM	0.00	0.00	03:30 PM	0.00	0.00
0.13	02:00 PM	0.15	0.13	04:00 PM	0.00	0.00
0.13	02:30 PM	0.00	0.00	04:30 PM	0.02	0.02
0.13	03:00 PM	0.00	0.00	05:00 PM	0.05	0.05
0.13	03:30 PM	0.00	0.00	05:30 PM	0.00	0.00
0.13	04:00 PM	7.37	0.13	06:00 PM	0.00	0.00
0.13	04:30 PM	0.00	0.00	06:30 PM	0.51	0.13
0.13	05:00 PM	0.00	0.00	07:00 PM	0.00	0.00
0.13	05:30 PM	0.00	0.00	07:30 PM	0.00	0.00
0.13	06:00 PM	0.65	0.13			
Total					**15.29**	**1.79**

Normalisation of unplanned SAIFI major events RY22						
SAIFI unplanned boundary value						**0.0729**
1/48th of the SAIFI unplanned boundary value	6/04/2021 23:30 (event 4)			13/04/2021 15:00 (event 5)		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.0015	11:30 PM	0.0000	-	03:00 PM	0.0000	-
0.0015	12:00 AM	0.0000	-	03:30 PM	0.0000	-
0.0015	12:30 AM	0.0000	-	04:00 PM	0.0000	-
0.0015	01:00 AM	0.0000	-	04:30 PM	0.0000	-
0.0015	01:30 AM	0.0000	-	05:00 PM	0.0000	-
0.0015	02:00 AM	0.0000	-	05:30 PM	0.0000	-
0.0015	02:30 AM	0.0000	-	06:00 PM	0.0000	-
0.0015	03:00 AM	0.0000	-	06:30 PM	0.0000	-
0.0015	03:30 AM	0.0000	-	07:00 PM	0.0000	-
0.0015	04:00 AM	0.0000	-	07:30 PM	0.0000	-
0.0015	04:30 AM	0.0000	-	08:00 PM	0.0000	-
0.0015	05:00 AM	0.0000	-	08:30 PM	0.0000	-
0.0015	05:30 AM	0.0000	-	09:00 PM	0.0001	0.0001
0.0015	06:00 AM	0.0000	-	09:30 PM	0.0000	-
0.0015	06:30 AM	0.0000	-	10:00 PM	0.0000	-
0.0015	07:00 AM	0.0000	-	10:30 PM	0.0000	-
0.0015	07:30 AM	0.0000	-	11:00 PM	0.0000	-
0.0015	08:00 AM	0.0000	-	11:30 PM	0.0000	-
0.0015	08:30 AM	0.0000	-	12:00 AM	0.0000	-
0.0015	09:00 AM	0.0000	-	12:30 AM	0.0000	-
0.0015	09:30 AM	0.0000	-	01:00 AM	0.0000	-

Normalisation of unplanned SAIFI major events RY22						
SAIFI unplanned boundary value						0.0729
1/48th of the SAIFI unplanned boundary value	6/04/2021 23:30 (event 4, continued)			13/04/2021 15:00 (event 5, continued)		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.0015	10:00 AM	0.0000	-	01:30 AM	0.0000	-
0.0015	10:30 AM	0.0000	-	02:00 AM	0.0000	-
0.0015	11:00 AM	0.0000	-	02:30 AM	0.0000	-
0.0015	11:30 AM	0.0000	-	03:00 AM	0.0000	-
0.0015	12:00 PM	0.0000	-	03:30 AM	0.0000	-
0.0015	12:30 PM	0.0000	-	04:00 AM	0.0000	-
0.0015	01:00 PM	0.0000	-	04:30 AM	0.0000	-
0.0015	01:30 PM	0.0000	-	05:00 AM	0.0000	-
0.0015	02:00 PM	0.0000	-	05:30 AM	0.0000	-
0.0015	02:30 PM	0.0000	-	06:00 AM	0.0000	-
0.0015	03:00 PM	0.0000	-	06:30 AM	0.0000	-
0.0015	03:30 PM	0.0000	-	07:00 AM	0.0000	-
0.0015	04:00 PM	0.0000	-	07:30 AM	0.0000	-
0.0015	04:30 PM	0.0000	-	08:00 AM	0.0000	-
0.0015	05:00 PM	0.0000	-	08:30 AM	0.0000	-
0.0015	05:30 PM	0.0000	-	09:00 AM	0.0000	-
0.0015	06:00 PM	0.0000	-	09:30 AM	0.0000	-
0.0015	06:30 PM	0.0000	-	10:00 AM	0.0000	-
0.0015	07:00 PM	0.0000	-	10:30 AM	0.0000	-
0.0015	07:30 PM	0.0000	-	11:00 AM	0.0000	-
0.0015	08:00 PM	0.0611	0.0015	11:30 AM	0.0000	-
0.0015	08:30 PM	0.0000	-	12:00 PM	0.0000	-
0.0015	09:00 PM	0.0000	-	12:30 PM	0.0000	-
0.0015	09:30 PM	0.0000	-	01:00 PM	0.0011	0.0011
0.0015	10:00 PM	0.0000	-	01:30 PM	0.0000	-
0.0015	10:30 PM	0.0000	-	02:00 PM	0.0000	-
0.0015	11:00 PM	0.0141	0.0015	02:30 PM	0.0718	0.0015
0.0015	11:30 PM	0.0000	-	03:00 PM	0.0000	-
0.0015	12:00 AM	0.0000	-	03:30 PM	0.0000	-
0.0015	12:30 AM	0.0000	-	04:00 PM	0.0000	-
0.0015	01:00 AM	0.0000	-	04:30 PM	0.0000	-
0.0015	01:30 AM	0.0000	-	05:00 PM	0.0000	-
0.0015	02:00 AM	0.0000	-	05:30 PM	0.0000	-
0.0015	02:30 AM	0.0000	-	06:00 PM	0.0000	-
0.0015	03:00 AM	0.0000	-	06:30 PM	0.0000	-
0.0015	03:30 AM	0.0000	-	07:00 PM	0.0000	-
0.0015	04:00 AM	0.0000	-	07:30 PM	0.0000	-
0.0015	04:30 AM	0.0000	-	08:00 PM	0.0000	-
0.0015	05:00 AM	0.0000	-	08:30 PM	0.0000	-
0.0015	05:30 AM	0.0000	-			
0.0015	06:00 AM	0.0000	-			

Normalisation of unplanned SAIFI major events RY22						
SAIFI unplanned boundary value						**0.0729**
1/48th of the SAIFI unplanned boundary value	6/04/2021 23:30 (event 4, continued)			13/04/2021 15:00 (event 5, continued)		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.0015	06:30 AM	0.0000	-			
0.0015	07:00 AM	0.0000	-			
0.0015	07:30 AM	0.0000	-			
0.0015	08:00 AM	0.0000	-			
0.0015	08:30 AM	0.0000	-			
0.0015	09:00 AM	0.0022	0.0015			
0.0015	09:30 AM	0.0000	-			
0.0015	10:00 AM	0.0000	-			
0.0015	10:30 AM	0.0000	-			
0.0015	11:00 AM	0.0000	-			
0.0015	11:30 AM	0.0000	-			
0.0015	12:00 PM	0.0000	-			
0.0015	12:30 PM	0.0000	-			
0.0015	01:00 PM	0.0000	-			
0.0015	01:30 PM	0.0000	-			
0.0015	02:00 PM	0.0000	-			
0.0015	02:30 PM	0.0000	-			
0.0015	03:00 PM	0.0000	-			
0.0015	03:30 PM	0.0000	-			
0.0015	04:00 PM	0.0000	-			
0.0015	04:30 PM	0.0000	-			
0.0015	05:00 PM	0.0000	-			
0.0015	05:30 PM	0.0000	-			
0.0015	06:00 PM	0.0000	-			
0.0015	06:30 PM	0.0000	-			
0.0015	07:00 PM	0.0000	-			
0.0015	07:30 PM	0.0000	-			
Total		**0.0775**	**0.0046**		**0.0730**	**0.0027**

Normalisation of unplanned SAIFI major events RY22						
SAIFI unplanned boundary value						0.0729
1/48th of the SAIFI unplanned boundary value	10/05/2021 17:30 (event 6)			3/06/2021 10:00 (event 7)		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.0015	05:30 PM	0.0000	-	10:00 AM	0.0000	-
0.0015	06:00 PM	0.0000	-	10:30 AM	0.0000	-
0.0015	06:30 PM	0.0000	-	11:00 AM	0.0000	-
0.0015	07:00 PM	0.0000	-	11:30 AM	0.0000	-
0.0015	07:30 PM	0.0000	-	12:00 PM	0.0000	-
0.0015	08:00 PM	0.0000	-	12:30 PM	0.0000	-
0.0015	08:30 PM	0.0000	-	01:00 PM	0.0000	-
0.0015	09:00 PM	0.0000	-	01:30 PM	0.0000	-
0.0015	09:30 PM	0.0000	-	02:00 PM	0.0000	-
0.0015	10:00 PM	0.0000	-	02:30 PM	0.0000	-
0.0015	10:30 PM	0.0000	-	03:00 PM	0.0000	-
0.0015	11:00 PM	0.0000	-	03:30 PM	0.0000	-
0.0015	11:30 PM	0.0000	-	04:00 PM	0.0000	-
0.0015	12:00 AM	0.0000	-	04:30 PM	0.0000	-
0.0015	12:30 AM	0.0000	-	05:00 PM	0.0000	-
0.0015	01:00 AM	0.0000	-	05:30 PM	0.0000	-
0.0015	01:30 AM	0.0000	-	06:00 PM	0.0000	-
0.0015	02:00 AM	0.0000	-	06:30 PM	0.0000	-
0.0015	02:30 AM	0.0000	-	07:00 PM	0.0000	-
0.0015	03:00 AM	0.0000	-	07:30 PM	0.0000	-
0.0015	03:30 AM	0.0000	-	08:00 PM	0.0000	-
0.0015	04:00 AM	0.0000	-	08:30 PM	0.0000	-
0.0015	04:30 AM	0.0000	-	09:00 PM	0.0000	-
0.0015	05:00 AM	0.0000	-	09:30 PM	0.0000	-
0.0015	05:30 AM	0.0000	-	10:00 PM	0.0000	-
0.0015	06:00 AM	0.0000	-	10:30 PM	0.0000	-
0.0015	06:30 AM	0.0000	-	11:00 PM	0.0000	-
0.0015	07:00 AM	0.0000	-	11:30 PM	0.0000	-
0.0015	07:30 AM	0.0000	-	12:00 AM	0.0000	-
0.0015	08:00 AM	0.0000	-	12:30 AM	0.0000	-
0.0015	08:30 AM	0.0000	-	01:00 AM	0.0000	-
0.0015	09:00 AM	0.0000	-	01:30 AM	0.0000	-
0.0015	09:30 AM	0.0000	-	02:00 AM	0.0000	-
0.0015	10:00 AM	0.0000	-	02:30 AM	0.0000	-
0.0015	10:30 AM	0.0000	-	03:00 AM	0.0000	-
0.0015	11:00 AM	0.0000	-	03:30 AM	0.0000	-
0.0015	11:30 AM	0.0000	-	04:00 AM	0.0000	-
0.0015	12:00 PM	0.0000	-	04:30 AM	0.0000	-
0.0015	12:30 PM	0.0000	-	05:00 AM	0.0000	-

Normalisation of unplanned SAIFI major events RY22						
SAIFI unplanned boundary value						**0.0729**
1/48th of the SAIFI unplanned boundary value	10/05/2021 17:30 (event 6, continued)			3/06/2021 10:00 (event 7, continued)		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.0015	01:00 PM	0.0000	-	05:30 AM	0.0000	-
0.0015	01:30 PM	0.0000	-	06:00 AM	0.0000	-
0.0015	02:00 PM	0.0000	-	06:30 AM	0.0000	-
0.0015	02:30 PM	0.0000	-	07:00 AM	0.0000	-
0.0015	03:00 PM	0.0000	-	07:30 AM	0.0000	-
0.0015	03:30 PM	0.0000	-	08:00 AM	0.0000	-
0.0015	04:00 PM	0.0000	-	08:30 AM	0.0000	-
0.0015	04:30 PM	0.0000	-	09:00 AM	0.0000	-
0.0015	05:00 PM	0.0940	0.0015	09:30 AM	0.2530	0.0015
0.0015	05:30 PM	0.0000	-	10:00 AM	0.0000	-
0.0015	06:00 PM	0.0000	-	10:30 AM	0.0000	-
0.0015	06:30 PM	0.0000	-	11:00 AM	0.0000	-
0.0015	07:00 PM	0.0000	-	11:30 AM	0.0000	-
0.0015	07:30 PM	0.0000	-	12:00 PM	0.0000	-
0.0015	08:00 PM	0.0000	-	12:30 PM	0.0015	0.0015
0.0015	08:30 PM	0.0000	-	01:00 PM	0.0000	-
0.0015	09:00 PM	0.0000	-	01:30 PM	0.0000	-
0.0015	09:30 PM	0.0000	-	02:00 PM	0.0000	-
0.0015	10:00 PM	0.0000	-	02:30 PM	0.0000	-
0.0015	10:30 PM	0.0000	-	03:00 PM	0.0000	-
0.0015	11:00 PM	0.0000	-	03:30 PM	0.0000	-
0.0015	11:30 PM	0.0000	-	04:00 PM	0.0000	-
0.0015	12:00 AM	0.0000	-	04:30 PM	0.0000	-
0.0015	12:30 AM	0.0000	-	05:00 PM	0.0000	-
0.0015	01:00 AM	0.0000	-	05:30 PM	0.0000	-
0.0015	01:30 AM	0.0000	-	06:00 PM	0.0000	-
0.0015	02:00 AM	0.0000	-	06:30 PM	0.0000	-
0.0015	02:30 AM	0.0000	-	07:00 PM	0.0000	-
0.0015	03:00 AM	0.0000	-	07:30 PM	0.0000	-
0.0015	03:30 AM	0.0000	-	08:00 PM	0.0000	-
0.0015	04:00 AM	0.0000	-	08:30 PM	0.0000	-
0.0015	04:30 AM	0.0000	-	09:00 PM	0.0000	-
0.0015	05:00 AM	0.0000	-	09:30 PM	0.0000	-
0.0015	05:30 AM	0.0000	-	10:00 PM	0.0000	-
0.0015	06:00 AM	0.0000	-	10:30 PM	0.0000	-
0.0015	06:30 AM	0.0000	-	11:00 PM	0.0000	-
0.0015	07:00 AM	0.0000	-	11:30 PM	0.0000	-
0.0015	07:30 AM	0.0000	-	12:00 AM	0.0000	-
0.0015	08:00 AM	0.0000	-	12:30 AM	0.0000	-
0.0015	08:30 AM	0.0000	-	01:00 AM	0.0000	-
0.0015	09:00 AM	0.0000	-	01:30 AM	0.0000	-

SAIFI unplanned boundary value						**0.0729**
1/48th of the SAIFI unplanned boundary value	10/05/2021 17:30 (event 6, continued)			3/06/2021 10:00 (event 7, continued)		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.0015	09:30 AM	0.0000	-	02:00 AM	0.0000	-
0.0015	10:00 AM	0.0000	-	02:30 AM	0.0000	-
0.0015	10:30 AM	0.0002	0.0002	03:00 AM	0.0000	-
0.0015	11:00 AM	0.0000	-	03:30 AM	0.0000	-
0.0015	11:30 AM	0.0000	-	04:00 AM	0.0000	-
0.0015	12:00 PM	0.0000	-	04:30 AM	0.0000	-
0.0015	12:30 PM	0.0000	-	05:00 AM	0.0000	-
0.0015	01:00 PM	0.0000	-	05:30 AM	0.0000	-
0.0015	01:30 PM	0.0000	-	06:00 AM	0.0000	-
0.0015	02:00 PM	0.0000	-	06:30 AM	0.0000	-
0.0015	02:30 PM	0.0000	-	07:00 AM	0.0000	-
0.0015	03:00 PM	0.0000	-	07:30 AM	0.0000	-
0.0015	03:30 PM	0.0000	-	08:00 AM	0.0000	-
0.0015	04:00 PM	0.0000	-	08:30 AM	0.0000	-
0.0015	04:30 PM	0.0000	-	09:00 AM	0.0000	-
Total		**0.0942**	**0.0017**		**0.2545**	**0.0030**

Normalisation of unplanned SAIFI major events RY22						
SAIFI unplanned boundary value						**0.0729**
1/48th of the SAIFI unplanned boundary value	9/09/2021 3:30 (event 8)			27/10/2021 12:00 (event 9)		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.0015	03:30 AM	0.0000	-	12:00 PM	0.0000	-
0.0015	04:00 AM	0.0000	-	12:30 PM	0.0000	-
0.0015	04:30 AM	0.0000	-	01:00 PM	0.0000	-
0.0015	05:00 AM	0.0000	-	01:30 PM	0.0000	-
0.0015	05:30 AM	0.0000	-	02:00 PM	0.0000	-
0.0015	06:00 AM	0.0000	-	02:30 PM	0.0000	-
0.0015	06:30 AM	0.0000	-	03:00 PM	0.0000	-
0.0015	07:00 AM	0.0000	-	03:30 PM	0.0000	-
0.0015	07:30 AM	0.0000	-	04:00 PM	0.0000	-
0.0015	08:00 AM	0.0000	-	04:30 PM	0.0115	0.0015
0.0015	08:30 AM	0.0000	-	05:00 PM	0.0000	-
0.0015	09:00 AM	0.0000	-	05:30 PM	0.0000	-
0.0015	09:30 AM	0.0000	-	06:00 PM	0.0000	-
0.0015	10:00 AM	0.0000	-	06:30 PM	0.0000	-
0.0015	10:30 AM	0.0000	-	07:00 PM	0.0000	-
0.0015	11:00 AM	0.0000	-	07:30 PM	0.0000	-
0.0015	11:30 AM	0.0000	-	08:00 PM	0.0000	-
0.0015	12:00 PM	0.0000	-	08:30 PM	0.0000	-
0.0015	12:30 PM	0.0000	-	09:00 PM	0.0000	-
0.0015	01:00 PM	0.0000	-	09:30 PM	0.0000	-
0.0015	01:30 PM	0.0000	-	10:00 PM	0.0000	-
0.0015	02:00 PM	0.0000	-	10:30 PM	0.0000	-
0.0015	02:30 PM	0.0000	-	11:00 PM	0.0000	-
0.0015	03:00 PM	0.0000	-	11:30 PM	0.0000	-
0.0015	03:30 PM	0.0000	-	12:00 AM	0.0000	-
0.0015	04:00 PM	0.0000	-	12:30 AM	0.0000	-
0.0015	04:30 PM	0.0000	-	01:00 AM	0.0000	-
0.0015	05:00 PM	0.0000	-	01:30 AM	0.0000	-
0.0015	05:30 PM	0.0000	-	02:00 AM	0.0000	-
0.0015	06:00 PM	0.0000	-	02:30 AM	0.0000	-
0.0015	06:30 PM	0.0000	-	03:00 AM	0.0000	-
0.0015	07:00 PM	0.0076	0.0015	03:30 AM	0.0000	-
0.0015	07:30 PM	0.0000	-	04:00 AM	0.0000	-
0.0015	08:00 PM	0.0000	-	04:30 AM	0.0000	-
0.0015	08:30 PM	0.0000	-	05:00 AM	0.0000	-
0.0015	09:00 PM	0.0000	-	05:30 AM	0.0000	-
0.0015	09:30 PM	0.0000	-	06:00 AM	0.0000	-
0.0015	10:00 PM	0.0020	0.0015	06:30 AM	0.0000	-

Normalisation of unplanned SAIFI major events RY22						
SAIFI unplanned boundary value						**0.0729**
1/48th of the SAIFI unplanned boundary value	9/09/2021 3:30 (event 8, continued)			27/10/2021 12:00 (9, continued)		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.0015	10:30 PM	0.0000	-	07:00 AM	0.0000	-
0.0015	11:00 PM	0.0000	-	07:30 AM	0.0000	-
0.0015	11:30 PM	0.0000	-	08:00 AM	0.0000	-
0.0015	12:00 AM	0.0000	-	08:30 AM	0.0000	-
0.0015	12:30 AM	0.0000	-	09:00 AM	0.0018	0.0015
0.0015	01:00 AM	0.0000	-	09:30 AM	0.0000	-
0.0015	01:30 AM	0.0000	-	10:00 AM	0.0000	-
0.0015	02:00 AM	0.0227	0.0015	10:30 AM	0.0000	-
0.0015	02:30 AM	0.0138	0.0015	11:00 AM	0.0000	-
0.0015	03:00 AM	0.0215	0.0015	11:30 AM	0.0756	0.0015
0.0015	03:30 AM	0.0168	0.0015	12:00 PM	0.0000	-
0.0015	04:00 AM	0.0000	-	12:30 PM	0.0000	-
0.0015	04:30 AM	0.0155	0.0015	01:00 PM	0.0000	-
0.0015	05:00 AM	0.0000	-	01:30 PM	0.0000	-
0.0015	05:30 AM	0.0000	-	02:00 PM	0.0000	-
0.0015	06:00 AM	0.0000	-	02:30 PM	0.0000	-
0.0015	06:30 AM	0.0008	0.0008	03:00 PM	0.0000	-
0.0015	07:00 AM	0.0000	-	03:30 PM	0.0000	-
0.0015	07:30 AM	0.0000	-	04:00 PM	0.0000	-
0.0015	08:00 AM	0.0000	-	04:30 PM	0.0000	-
0.0015	08:30 AM	0.0004	0.0004	05:00 PM	0.0000	-
0.0015	09:00 AM	0.0042	0.0015	05:30 PM	0.0000	-
0.0015	09:30 AM	0.0008	0.0008	06:00 PM	0.0000	-
0.0015	10:00 AM	0.0000	-	06:30 PM	0.0000	-
0.0015	10:30 AM	0.0000	-	07:00 PM	0.0000	-
0.0015	11:00 AM	0.0000	-	07:30 PM	0.0000	-
0.0015	11:30 AM	0.0000	-	08:00 PM	0.0000	-
0.0015	12:00 PM	0.0000	-	08:30 PM	0.0000	-
0.0015	12:30 PM	0.0000	-	09:00 PM	0.0000	-
0.0015	01:00 PM	0.0093	0.0015	09:30 PM	0.0000	-
0.0015	01:30 PM	0.0000	-	10:00 PM	0.0000	-
0.0015	02:00 PM	0.0000	-	10:30 PM	0.0000	-
0.0015	02:30 PM	0.0000	-	11:00 PM	0.0000	-
0.0015	03:00 PM	0.0000	-	11:30 PM	0.0000	-
0.0015	03:30 PM	0.0000	-	12:00 AM	0.0000	-
0.0015	04:00 PM	0.0000	-	12:30 AM	0.0000	-
0.0015	04:30 PM	0.0000	-	01:00 AM	0.0000	-
0.0015	05:00 PM	0.0000	-	01:30 AM	0.0000	-
0.0015	05:30 PM	0.0000	-	02:00 AM	0.0000	-

Normalisation of unplanned SAIFI major events RY22						
SAIFI unplanned boundary value						**0.0729**
1/48th of the SAIFI unplanned boundary value	9/09/2021 3:30 (event 8, continued)			27/10/2021 12:00 (event 9, continued)		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.0015	06:00 PM	0.0000	-	02:30 AM	0.0000	-
0.0015	06:30 PM	0.0000	-	03:00 AM	0.0000	-
0.0015	07:00 PM	0.0000	-	03:30 AM	0.0000	-
0.0015	07:30 PM	0.0000	-	04:00 AM	0.0000	-
0.0015	08:00 PM	0.0000	-	04:30 AM	0.0000	-
0.0015	08:30 PM	0.0000	-	05:00 AM	0.0000	-
0.0015	09:00 PM	0.0000	-	05:30 AM	0.0000	-
0.0015	09:30 PM	0.0000	-	06:00 AM	0.0000	-
0.0015	10:00 PM	0.0000	-	06:30 AM	0.0000	-
0.0015	10:30 PM	0.0000	-	07:00 AM	0.0000	-
0.0015	11:00 PM	0.0000	-	07:30 AM	0.0000	-
0.0015	11:30 PM	0.0000	-	08:00 AM	0.0000	-
0.0015	12:00 AM	0.0000	-	08:30 AM	0.0000	-
0.0015	12:30 AM	0.0000	-	09:00 AM	0.0033	0.0015
0.0015	01:00 AM	0.0000	-	09:30 AM	0.0000	-
0.0015	01:30 AM	0.0000	-	10:00 AM	0.0000	-
0.0015	02:00 AM	0.0000	-	10:30 AM	0.0000	-
0.0015	02:30 AM	0.0000	-	11:00 AM	0.0000	-
Total		**0.1155**	**0.0157**		**0.0922**	**0.0061**

Disclosure required under causes 11.6(g) & 11.6(h) for major interruptions.

Severe rain and flooding event 1 29 to 31 May 2021	*How the event occurred* Severe weather event resulted in 9 of 32 river crossing across the network being affected by flooding. The Ashburton River flooded, affecting the operation of ground mounted transformers in the area. *The main equipment affected by the event* The main equipment affected were poles and transformers which were washed away. Additionally, switches could not be operated safely due to flooding and there was a need to isolate underground equipment due to safety concerns. *How EA Networks responded* EA Networks responded to the severe weather event according to its internal process: isolation and restore power when possible, carrying out damage assessment, repairs, and staged restoration. *Our post event review* The level of flooding that the network experienced was well outside of what would normally be expected; thus, the network was not designed to withstand the level of food it experienced. The event demonstrates design standards trade-off between the cost of security and associated consumers benefits. Our design standards aim to keep the network energised during known normal severe events, but not events of this nature. *Mitigating factors* Climate change will most likely result in more severe weather events. Thus, the key mitigation that EA Networks could do is improve the design standards to accommodate such severe weather events. However, the cost of the improvement needs to be balanced against additional benefits consumers gain from the investment.
Severe wind events 2 & 8 9th – 11th of September 2021	*How the event occurred* On the 9th of September Mid Canterbury experienced severe wind gusts of approximately 137km, resulting in widespread damage to the rural overhead 11 and 22kV network and associated equipment around the Staveley, Mount Somers, Mount Hutt and Methven areas and related foothills. *The main equipment affected by the event* The main equipment affected by the event was: • wind blow bark from trees within the fall and growth limit zone onto non-insulated/bare conductor on overhead lines, resulting in circuit breakers operating disputing the flow of energy. • line slices and other of connections failed on the bare conductor. • poles failed due to high wind related issues. • two pole mounted transformers failed due to high wind related issues.

Severe wind events 2 & 8 9 – 11 September 2021 (continued)	*How EA Network responded* EA Networks responded to the severe weather event according to internal processes: isolating and resorting power when possible, carrying out damage assessment, repairs, and staged restoration where applicable. Additional vegetation resources were also brought in to assist the repair work. *Our post event review* The post event analysis found that one of the most significant factors resulting in the interruption was bark from blue gum trees situated outside of the current area covered under the Tree Regulations. We are engaging with the owners of the blue gum trees to identify a way forward, but do not have regulatory backing to compell tree removal or trimming as they are outside the fall zone. We have engaged an external party to undertake a vegetation survey across the network and create a database of trees within the fall zones. This database (now approximatley 30% completed in August 2022) enables improved visibility of vegetation issues and associated management. Once the vegetation survey is completed, we will be a much better position to identify and manage trees which present high risk of creating an interruption. *Mitigating factors* EA Networks ability to minimise SAIDI and SAIFI caused by wind is affected by the Tree Regulations that do not cover fall zone vegetation that has the potential to interrupt supply. We have and will continue to consider increasing sectionalising and protection on the network which would reduce the number of consumers without power during the interruptions. This approach comes at a cost to consumers and as such we need to balance the cost of increased protection with benefit to consumers.
Severe wind event 3 11 – 13 September 2021	*How the event occurred* On the 12th of September Mid Canterbury experienced strong winds with gusts of approximately 137km. The area affected by the event was the same as events 2 & 8. *The main equipment affected by the event* The main equipment affected by the event was: • the wind blow bark from trees within the fall and growth limit zone onto non-insulated/bare conductor on overhead lines, resulting in circuit breakers operating. • line splices and other of connections failed on the bare conductor. • poles failed due to high wind related issues. • two pole mounted transformers failed due to high wind related issues. *How EA Networks responded* EA Networks responded to the severe weather event according to internal process: isolating and restoring power when possible, carrying out damage assessment, repairs, and staged restoration where applicable. Additional vegetation resources were also brought in to assist the repair work.

	Our post event review Our post event analysis has found that one of the most important issues resulting in the interruptions was bark from blue gum trees situated outside of the current area covered under the Tree Regulations. We are engaging with the owners of the blue gum trees to identify a way forward, but do not have regulatory backing to compel tree removal or trimming as they are outside the fall zone.
Severe wind event 3 11 – 13 September 2021 (continued)	*Mitigating factors* EA Networks ability to minimise SAIDI and SAIFI caused by wind is affected by the Tree Regulations that do not cover fall zone vegetation that has the potential to interrupt supply. We have and will continue to consider increasing sectionalising and protection on the network which would reduce the number of consumers without power during the interruptions. This approach comes at a cost to consumers and as such we need to balance the cost of increased protection with benefit to consumers.
Human error event 4 6-8 April 2021	*How the event occurred* Load was being shifted to isolate equipment for maintenance. During this process the load current increased on the 'feeder breaker' at the substation to a stage that tripped the circuit breaker at the substation, resulting in the interruptions to the Tinwald zone substation and the area that it services. *The main equipment affected by the event* Protection relays at Tinwald zone substations. *How EA Networks responded* EA Networks responded according to its internal processes: which was to use the SCADA to reconfigure circuits and re-energise. *Our post event review* The post event review identified that no standard approach within EA Networks for the configuring and the operation of the specific protection specific equipment involved in the event. A standard approach would have ensured correct configuration of the protection equipment which in turn would have stopped the fault from occurring. *Mitigating factors* To mitigate the risk of future similar major events, EA Networks has created templates and standardisation process for protection setting across the whole network and testing is currently in progress to ensure compliance with the updated approach.

Human error event 5 13-15 April 2021	*How the event occurred* The event occurred at the Tinward zone substation and cause of this major event is the same as in event 4. *The main equipment affected by the event* Protection relays at Tinwald zone substations. *How EA Networks responded* EA Networks response to the major event was the same as event 4. *Our post event review* At the time that major event occurred we were in the process of updating the protection setting across the network and had not yet undertaken the required charges for this site. This protection settings update is non-trivial and requires careful and detailed engineering effort for a reasonable period of time. There was a missed opportunity to avert this second event, in that urgency of this change related to the second upcoming outage at Tinwald had not been passed on to the Engineering team and confirmation that the change had been made was not sought before proceeding with the second load shifting switching. *Mitigating factors* The mitigating factors are the same as detailed in event 4. The steps that EA networks is taking to mitigate the risk of future similar major events are the same as detailed in event 4, as well as clearer communication of priority and urgency between the Control team and Engineering
Defective equipment event 6 10–12 May 2021	*How the event occurred* EA Networks was isolating switchgear, that feeds the Methven 11kV underground, for urgent maintenance. The switchgear failed during operation resulting in the Methven feed being unable to supply energy to the associated consumers. *The main equipment affected by the event* Switchgear that feeds the Methven 11kV underground network. *How EA Networks responded* EA Networks responded to the event by following its standard operational processes: isolating the switchgear to carry out the maintenance. *What our post event review found* The switchgear had recently been included as part of a new maintenance program. The new maintenance program was underway at the time of the failure, but the program had not yet reached switchgear. *Mitigating factors* Our post event review did not identify any steps to mitigate the risk of future similar major event. The reasoning for this is that there is a maintenance and inspection program in place for this type of switchgear. We've experienced 2 similar events in the last 15 years. We have confidence our maintenance program will reduce the risk of such an event occurring again.

Vehicle accident event 7: 3–5 June 2021	*How the event occurred.* A vehicle hit a 66kV pole. *The main equipment affected by the event.* Rural subtransmission circuit on Wakanui Road. *How EA Networks responded* EA Networks responded to the event by following its standard operational processes by using the SCADA to isolate the circuit and re-liven the substation. *What our post event review found* As a result of the vehicle hitting the pole the upstream substation protection relay was activated, resulting in the isolation of the whole substation instead of just the circuit. *Mitigating factors* The mitigating factors that may have prevented or minimized the major event were the same as in event 4.
Human error event 9: 27–29 October 2021	*How the event occurred* The event resulted from human error while a zone sub transformer was being commissioned. *The main equipment affected by the event* Zone sub transformer at the Methven zone substation, on Bealey Road. *How EA Networks responded* EA Networks responded to the event by following its standard operational process: using SCADA, the transformer was isolated and the substation re-livened. *Our post event review found* During commissioning of the zone sub transformer, the inrush current created from impedance tripped the transformer protection resulting in power being lost to the township. While inrush current had been anticipated and factored into the work plan, the level of inrush current was significantly higher than anticipated due to the proximity of another transformer. The event resulted from the incorrect operation of the protection and livening sequence. *Mitigating factors* To mitigate the risk of future similar major event works have been carried out at the site as part of the AMP work program. The upstream transformer now has greater capacity and that, combined with the work in templating and standardising of protection settings has reduced the risk of this event being repeated.

Appendix F - Director's certificate

Form of director's certificate for annual compliance statement

We, Paul Jason Munro and Philip John McKendry, being directors of Electricity Ashburton Limited, trading as EA Networks certify that, having made all reasonable enquiry, to the best of our knowledge and belief, the attached annual compliance statement of EA Networks, and related information, prepared for the purposes of the Electricity Distribution Services Default Price-Quality Path Determination 2020 has been prepared in accordance with all the relevant requirements.

Paul Jason Munro

Philip John McKendry

19 August 2022

Independent Assurance Report

To the Directors of Electricity Ashburton Limited

Assurance report pursuant to Electricity Distribution Services Default Price-Quality Path Determination 2020 (consolidated 20 May 2020)

We have completed the reasonable assurance engagement in respect of the compliance of Electricity Ashburton Limited, trading as EA Networks (the "Company") with the Electricity Distribution Services Default Price-Quality Path Determination 2020 consolidated 20 May 2020 ("the Determination") in preparing the Annual Compliance Statement for the assessment period ended 31 March 2022.

In our opinion, in all material respects:

- as far as appears from an examination, the information used in the preparation of the Annual Compliance Statement has been properly extracted from the Company's accounting and other records, and has been sourced, where appropriate, from its financial and non-financial systems; and
- the Company has complied with clauses 11.5 and 11.6 of the Determination in preparing the Annual Compliance Statement for the assessment period ended 31 March 2022.

Basis for Opinion

We have conducted our engagement in accordance with the International Standard on Assurance Engagements (New Zealand) 3000 (Revised): *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* and Standard on Assurance Engagements *(*SAE) 3100 (Revised) *Compliance Engagements* ("SAE 3100 (Revised)"), issued by the New Zealand Auditing and Assurance Standards Board

We believe the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Directors' Responsibilities

The Directors of the Company are responsible on behalf of the Company for:

- the preparation of the Annual Compliance Statement under clause 11.4 and in accordance with the requirements in clauses 11.5 and 11.6 of the Determination; and
- the identification of risks that may threaten compliance with the Determination and for such internal controls that would mitigate those risks and monitoring the Company's ongoing compliance.

Our Independence and Quality Control

We have complied with the Professional and Ethical Standard 1 *International Code of Ethics for Assurance Practitioners (including International Independence Standards) (New Zealand)* or other professional requirements, or requirements in law or regulation, that are at least as demanding, which include independence and other requirements founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

In accordance with the Professional and Ethical Standard 3 (Amended) *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance Engagements* or other professional requirements, or requirements in law or regulation, that are at least as demanding, our firm maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

We are independent of the Company. Our firm carries out other services for the Company in the areas of annual audit of the Company's financial statements, compliance with regulatory requirements of the

Commerce Act 1986, the provision of regulatory and industry update advisory services and access to training materials through an online platform. In addition, certain partners and employees of our firm may deal with the Company on normal terms within the ordinary course of trading activities of the Company. The provision of these other services, these relationships and the access to training materials have not impaired our independence as auditor of the Company.

Assurance Practitioner's responsibilities
Our responsibility is to express an opinion on whether the Company has complied, in all material respects, with clause 11.5(e) and schedule 8(1)(b)(vi) and 8(1)(c) of the Determination are to express an opinion on whether:

- as far as appears from our examination, the information used in the preparation of the Annual Compliance Statement has been properly extracted from the Company's accounting and other records, sourced from its financial and non-financial systems; and
- the Annual Compliance Statement, for the assessment period ended 31 March 2022, has been prepared, in all material respects, in accordance with the requirements in clauses 11.5 and 11.6 of the Determination.

SAE 3100 (Revised) requires that we plan and perform our procedures to obtain reasonable assurance about whether the Company has complied, in all material respects, with the Determination, in preparing the Annual Compliance Statement for the assessment period ended 31 March 2022.

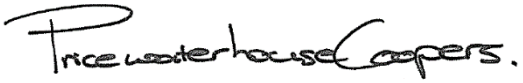
In relation to the wash-up amount set out in clause 8.6 of the Determination, our procedures included recalculation of the wash-up amount in accordance with schedule 1.6 of the Determination and assessing it against the amounts and disclosures contained on pages 3 to 6 and 12 to 16 of the Annual Compliance Statement.

In relation to the quality standards set out in clause 9 of the Determination, our procedures included examination, on a test basis, of evidence relevant to the values and disclosures contained on pages 6 to 11 and 17 to 35 of the Annual Compliance Statement.

An assurance engagement to report on the Company's compliance with the Determination involves performing procedures to obtain evidence about the compliance activity and controls implemented. The procedures selected depend on our judgement, including the identification and assessment of risks of material non-compliance.

Inherent Limitations
Because of the inherent limitations of an assurance engagement, together with the internal control structure, it is possible that fraud, error or non-compliance may occur and not be detected. A reasonable assurance engagement throughout the specified period does not provide assurance on whether compliance with the Determination will continue in the future.

Use of Report
This report has been prepared for the Directors in accordance with clause 11.5 (e) of the Determination and is provided solely to assist you in establishing that compliance requirements have been met. Our report should not be used for any other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility for any reliance on this report to anyone other than the Directors of the Company, as a body, or for any purpose other than that for which it was prepared.



Chartered Accountants
19 August 2022

Christchurch, New Zealand