



Orion New Zealand Limited

Electricity Distribution Services
Default Price-Quality Path Determination 2025

Annual compliance statement

For the year ending 31 March 2026

Issued 25 August 2026

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1. INTRODUCTION

Orion New Zealand Limited (Orion) 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) that Orion is subject to until 31 March 2027 (the DPP regulatory period), after which Orion expects to move to a customised price-quality path (CPP) until 31 March 2032.

This annual compliance statement is published per clause 11.4 of the Electricity Distribution Services Default Price-Quality Path Determination 2025 (the Determination). This statement applies to the first assessment period, commencing 1 April 2025 and ending 31 March 2026.

This statement confirms that Orion:

- complies with the requirements to calculate the wash-up amount for the assessment period (Section 2.1);
- complies with the quality standards for the assessment period (Section 2.2); and
- has not entered into any agreements with another electricity distribution business (EDB) or Transpower for an amalgamation, merger, major transaction, or transfer in the assessment period (Section 2.3).

Date Prepared

This annual compliance statement was prepared on 25 August 2026. A copy is available at Orion's office at 565 Wairakei Road, Burnside, Christchurch. The annual compliance statement is published on Orion's website at www.oriongroup.co.nz and additional copies can be provided on request.

2. COMPLIANCE STATEMENTS

2.1 PRICE PATH COMPLIANCE STATEMENT

As demonstrated in section 2.2, Orion has correctly calculated the wash-up accrual amount for the first assessment period, consistent with the input methodologies (IM) determination and Schedules 1.6 and 1.7 of the Determination.

2.2 WASH-UP ACCRUAL AMOUNT CALCULATION

As required by clause 11.4 of the Determination, Orion must calculate a wash-up accrual amount for each assessment period using the methodology specified in Schedule 1.6 of the Determination.

The washup amount calculated for this first assessment period of the DPP4 regulatory period will be used in determining the forecast allowable revenue for the first assessment period of Orion's CPP regulatory period, beginning 1 April 2027, as part of the wash-up drawdown amount calculation.

As demonstrated in Table 1, below, and consistent with Schedule 1.6 of the Determination, Orion has complied with the requirement to calculate the wash-up amount for the first assessment period.

Table 1: Wash-up accrual amount calculation

Term	Description	Value (\$000)
Actual allowable revenue (AAR)	Actual net allowable revenue + actual pass-through costs + actual recoverable costs + revenue receivable under large connection contracts	320,102.3
Actual revenue (AR)	Actual revenue from prices + other regulated income	307,119.7
Large Connection Contract Washup Amount (RLCC)	Revenue Received under all large connection contracts - Actual revenue received under all large connection contracts	Nil
Wash-up accrual amount	$AAR - AR - RLCC$	12,982.6

The wash-up accrual amount calculated for this assessment period will increase the forecast allowable revenue for the first assessment period of Orion's CPP regulatory period, beginning 1 April 2027, as part of the wash-up drawdown amount calculation. The main reasons driving the amount of the wash-up accrual for this assessment period are:

- The actual net allowable revenue for the pricing year starting 1 April 2025 was \$236,986k, and surpassed the forecast net allowable revenue of \$231,404k. The \$5,582k increase was a combination of the actual maximum allowable revenue (AMAR) reset as allowed in the first DPP4 assessment period contributing to \$3,953k, and increase in actual CPI contributing to \$1,629k.
- The pass-through and recoverable costs, which offset the wash-up amount, were lower than forecast by \$2,456k. The forecasts are inherently difficult to estimate when setting prices, being based on historical data and informed assumptions about the future conditions. Such variances are a normal part of financial forecasting.
- Actual revenue for the pricing year starting 1 April 2025 was \$307,120k compared to a forecast revenue of \$316,976k. The majority of the \$9,856k shortfall was due to forecast quantity assumptions used in price-setting when transitioning from a GXP billing methodology to an ICP billing methodology, and increased granularity in our tariff structures.

2.2.1 ACTUAL ALLOWABLE REVENUE

Actual allowable revenue for the first assessment period includes the actual net allowable revenue, actual pass-through and recoverable costs, and revenue receivable under large connection contracts.

Table 2, below, shows the actual allowable revenue for the first assessment period is consistent with Schedule 1.6 of the Determination.

Table 2: Actual allowable revenue calculation

Term	Description	Value (\$000)
Actual net allowable revenue (ANAR)	Amount calculated in accordance with Schedule 1.6(3)-(4) of the Determination	236,986.3
Actual pass-through costs	Sum of all pass-through costs that were incurred or approved by the Commission in the assessment period	78,133.0
Actual recoverable costs	Sum of all recoverable costs that were incurred or approved by the Commission in the assessment period	4,983.3
Revenue receivable under large connection contracts	Sum of revenue to be received under all large connection contracts in the assessment period	Nil
Total actual allowable revenue (AAR)	Actual net allowable revenue + actual pass-through costs and actual recoverable costs + Revenue wash-up draw down amount	320,102.3

Further information supporting actual pass-through costs and actual recoverable costs are included in Appendix A.

2.2.2 ACTUAL REVENUE

The Determination defines actual revenue as the sum of actual revenue from line charges and other regulated income.

Table 3, below, shows actual revenue for the assessment period consistent with clause 4.2 of the Determination.

Table 3: Actual revenue calculation

Term	Description	Value (\$000)
Actual revenue from line charges	Actual prices between 1 April 2025 and 31 March 2026 multiplied by actual quantities for the assessment period	303,169.6
Other regulated income	Other income associated with supply of electricity distribution services	3,950.1
Total actual revenue (AR)	Sum of actual revenue from prices + other regulated income	307,119.7

Further information supporting actual revenue from line charges is included in Appendix B.

2.2.3 LARGE CONNECTION CONTRACT WASHUP AMOUNT

Orion has no large connection contracts, as defined in the IMs, and therefore the value of the large connection contract wash-up amount is nil.

2.3 QUALITY STANDARDS COMPLIANCE STATEMENT

As demonstrated in section 2.4, Orion has complied with the quality standards specified in the clause 9 of the Determination for the first assessment period.

2.4 QUALITY STANDARDS AND INCENTIVES

This section of the Annual Compliance Statement demonstrates Orion's compliance with the quality standards.

2.4.1 DEMONSTRATION OF COMPLIANCE WITH PLANNED INTERRUPTIONS QUALITY STANDARDS

Planned interruptions consist of all Class B interruptions on the Orion network measured as System Average Interruption Duration Index (SAIDI) and System Average Interruption Frequency Index (SAIFI).

Clause 9.2 of the Determination specifies that, to comply with the planned interruptions quality standard, the sum of planned SAIDI and SAIFI assessed values for all five assessment periods of the DPP4 regulatory period (i.e., the five years from 1 April 2025 to 31 March 2030) must not exceed the planned accumulated SAIDI and SAIFI limits as specified in Schedule 3.1 of the Determination.

Table 4 and Table 5, below, show the planned SAIDI and SAIFI assessed values for the first assessment period, the planned accumulated SAIDI and SAIFI assessed values for the regulatory period to-date, and the planned accumulated SAIDI and SAIFI limits for Orion for the DPP4 regulatory period. It shows that Orion has complied with the planned interruption quality standards.

Table 4: Planned SAIDI for the assessment period

Planned SAIDI assessed value for the first assessment period	17.34
Planned accumulated SAIDI assessed value at the end of the first assessment period	17.34
Planned accumulated SAIDI limit for the regulatory period	218.24
Compliance result	Compliant

Table 5: Planned SAIFI for the assessment

Planned SAIFI assessed value for the first assessment period	0.1225
Planned accumulated SAIFI assessed value at the end of the first assessment period	0.1225
Planned accumulated SAIFI limit for the regulatory period	0.7399
Compliance result	Compliant

Planned SAIDI assessed values

Orion has calculated the planned SAIDI assessed value in accordance with subclause 2 of Schedule 3.1.

Table 6, below, shows the calculations of Orion's planned SAIDI assessed values for the assessment period.

Table 6: Planned SAIDI assessed value calculation

Planned SAIDI assessed value		
Term	Description	Value
Class B non-notified interruptions	Class B interruptions that are not notified interruptions	1.36
Class B notified interruptions falling outside window	Class B notified interruptions occurred partially or wholly outside of their specified notified window or alternate day	1.44
SAIDI_B	Sum of Class B non-notified interruptions and notified interruptions falling outside window	2.80
Class B notified interruptions falling within window	The SAIDI values of any Class B notified interruptions where the SAIDI value is the greater of that calculated based on: (i) The duration of minutes accumulated for each ICP that the Class B notified interruption occurred for; and (ii) The period of the notified interruption window minus two hours	27.83
Class B intended interruptions cancelled without notice	The 'intended SAIDI values' of any intended interruption cancelled without notice is the greater of that calculated based on: (i) The duration of minutes accumulated for each ICP that the intended interruption occurred for, which will be nil; and (ii) The period of the notified interruption window minus two hours.	1.26
Class B intended interruptions cancelled with notice	The 'intended SAIDI values' of any intended interruption cancelled with notice, where the 'intended SAIDI value' for each of those intended interruptions cancelled with notice is nil.	0
SAIDI_N	Sum of Class B notified interruptions falling within window and intended interruptions cancelled	29.09
Planned SAIDI assessed value	SAIDI_B + (SAIDI_N / 2)	17.34

2.4.2 DEMONSTRATION OF COMPLIANCE WITH UNPLANNED INTERRUPTION QUALITY STANDARDS

Clause 9.8 of the Determination specifies that to comply with the annual unplanned interruptions quality standard, Orion's unplanned SAIDI and SAIFI assessed values must not exceed the SAIDI and SAIFI annual limits.

The unplanned SAIDI assessment limit and the unplanned SAIFI assessment limit are specified in Schedule 3.2 of the Determination.

The unplanned SAIDI assessed value is calculated by summing the normalised SAIDI value of all unplanned Class C interruptions on the Orion network for the assessment period.

Unplanned SAIDI is normalised for major events. For any 24-hour period that starts on the hour or half past the hour, a SAIDI major event is triggered when the sum of SAIDI values over that 24-hour period for unplanned interruptions exceeds Orion's SAIDI unplanned boundary value of 3.10 minutes, specified in Schedule 3.2 of the Determination.

Table 7, below, shows that Orion has complied with the unplanned interruptions quality standard as Orion unplanned SAIDI assessed value is less than its unplanned SAIDI limit for the assessment period.

Table 7: Unplanned SAIDI for the assessment period

Unplanned SAIDI Limit	Schedule 3.2 of the Determination	80.47
Unplanned SAIDI assessed value	Sum of the SAIDI values for Class C interruptions commencing within the assessment period, where the SAIDI value for each 30-minute period that starts on the hour or half past the hour within a SAIDI major event that exceeds 1/48 th of the SAIDI unplanned boundary value for that assessment period is replaced with the 1/48 th of the SAIDI unplanned boundary value for that assessment period.	37.21
Compliance result		Compliant

The unplanned SAIFI assessed value is calculated by summing the normalised value of all unplanned Class C interruptions on the Orion network for the assessment period.

Unplanned SAIFI is normalised for major events. For any 24-hour period that starts on the hour or half past the hour, a SAIFI major event is triggered when the sum of SAIFI values over that 24-hour period for unplanned interruptions exceeds Orion's SAIFI unplanned boundary value of 0.0287, specified in Schedule 3.2 of the Determination.

Table 8, below, shows that Orion has complied with the unplanned interruptions quality standard as Orion's unplanned SAIFI assessed value is less than its unplanned SAIFI limit for the assessment period.

Table 8: Unplanned SAIFI for the assessment period

Unplanned SAIFI limit	Schedule 3.2 of the Determination	0.9819
Unplanned SAIFI assessed value	Sum of the SAIFI values for Class C interruptions commencing within the assessment period, where the SAIFI value for each 30-minute period that starts on the hour or half past the hour within a SAIFI major event that exceeds 1/48 th of the SAIFI unplanned boundary value for that assessment period is replaced with the 1/48 th of the SAIFI unplanned boundary value for that assessment period	0.4920
Compliance result		Compliant

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

2.4.3 MAJOR EVENTS

For the assessment period, we identified four SAIDI major events as a result of:

- A windstorm between 10th and 12th of July 2025 (orange severe weather warning (wind) issued by the Met Service)
- A windstorm between 22nd and 24th of October 2025 (red severe weather warning (wind) issued by the Met Service)
- A windstorm between 26th and 28th of October 2025 (orange severe weather warning (wind) issued by the Met Service)
- A rainstorm between 16th and 17th of February 2026 (orange severe weather warning (rainfall) issued by the Met Service)

Detailed Information relating to the SAIDI major events, in accordance with clause 11.6(h) of the Determination and supporting information for normalising the half-hourly SAIDI values during the major events, is included in Appendix D.

2.4.4 STATEMENT OF COMPLIANCE WITH EXTREME EVENT STANDARD

Clause 9.10 of the Determination specifies that, to comply with extreme event quality standard, Orion must not have an extreme event in the assessment period. The calculation of the unplanned interruptions, when assessing compliance against the extreme event quality standard, is permitted to exclude any unplanned interruption that is the result of 'major external factors'. The extreme event standard limit is specified in paragraphs (1)(a) and (b) of Schedule 3.3 of the Determination.

During the major event of 10-12 July 2025 (refer section 2.4.3, above), an interruption occurred that caused 4.63 million customer interruption minutes. That interruption, combined with other lesser interruptions that contributed to the major event, caused the extreme event standard limit of 6 million customer interruption minutes to be exceeded.

Despite this, Orion has obtained evidence that the 'natural disaster' limb of the 'major external factors' exclusion to the extreme event standard was triggered – specifically, that a 'severe weather event' had occurred and, therefore, Orion has maintained compliance with the extreme event standard. This evidence is included with the information supporting the major event assessment in Appendix D.

Table 9, below, shows that Orion has complied with the extreme event standard for the assessment period.

Table 9: Extreme event quality standard assessment

Number of extreme events	Nil
Compliance result	Compliant

2.4.5 QUALITY INCENTIVE ADJUSTMENT

The quality incentive adjustment is intended to provide an incentive for Orion to maintain or improve its quality of supply over the DPP regulatory period.

The calculation of the quality incentive adjustment is specified in Schedule 4 of the Determination.

Table 10, below, shows that Orion's quality incentive adjustment for the assessment period is a reward of \$2,154.5k.

Table 10: Quality incentive adjustment calculation

Term	Description	Value (\$000)
Planned SAIDI adjustment	$(\text{SAIDI}_{\text{planned, target}} - \text{SAIDI}_{\text{planned, assessed}}) \times 0.5 \times \text{IR}$	\$213.1
Unplanned SAIDI adjustment	$(\text{SAIDI}_{\text{unplanned, target}} - \text{SAIDI}_{\text{unplanned, assessed}}) \times \text{IR}$	\$1,703.7
Total uncapped adjustment	SAIDI planned adjustment + SAIDI unplanned adjustment	\$1,916.8
Revenue at risk	$0.02 \times \text{ANAR}$	\$4,739.7
Total reward	Lessor of the total uncapped adjustment and revenue at risk	\$1,916.8
Mid-point estimate of post-tax WACC		6.02%
Quality incentive adjustment	Total reward * (1+ mid-point estimate of post-tax WACC) ^2	\$2,154.5

The quality incentive adjustment will be applied as a recoverable cost when setting our prices two years after this assessment period, i.e., prices effective 1 April 2027.

Table 11, below, shows the inputs used to calculate Orion's quality incentive adjustment for the assessment period.

Table 11: Quality incentive adjustment calculation

Raw Inputs					
Term	Units	Value	Term	Units	Value
SAIDI planned interruption collar	minutes	0	SAIDI unplanned interruption collar	minutes	0
SAIDI planned interruption target	minutes	23.83	SAIDI unplanned interruption target	minutes	63.14
SAIDI planned interruption cap	minutes	43.65	SAIDI unplanned interruption cap	minutes	80.47
Planned SAIDI assessed value	minutes	17.34	Unplanned SAIDI assessed value	minutes	37.21
Incentive rate		\$32,848			
Actual net allowable revenue (ANAR)		\$234,335.5k			
Output Calculations					
SAIDI planned interruption target	minutes	23.83	SAIDI unplanned interruption target	minutes	63.14
Minimum of the planned SAIDI cap and assessed value	minutes	17.34	Minimum of the unplanned SAIDI cap and assessed value	minutes	37.21
Planned SAIDI subject to incentive	minutes	6.49	Unplanned SAIDI subject to incentive	minutes	25.93
Weighted incentive rate (IR x 0.5)		\$32,848	Incentive rate (IR)		\$65,697
SAIDI planned adjustment	\$213,105		SAIDI unplanned adjustment	\$1,703,690	

2.5 TRANSACTIONS

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

3. DIRECTORS' CERTIFICATE

A Directors' certificate in the form set out in Schedule 7 of the Determination is included in Appendix E.

4. ASSURANCE REPORT

An assurance report meeting the requirements of Schedule 8 of the Determination is included in Appendix F.

APPENDIX A – PASS-THROUGH AND RECOVERABLE COSTS

Pass-through costs

Table 12, below, shows the actual pass-through costs for the assessment period.

Table 12: Pass-through costs for the assessment period

Actual pass-through costs	Actual (\$000)
Local Authority Rates	6,095.9
Commerce Act Levies	749.4
Electricity Authority Levies	945.8
Utilities Disputes Levies	163.1
Transpower Connection charges	5,921.2
Transpower Benefit-based charges	11,934.9
Transpower Residual charge	48,112.3
Transpower Transitional cap	32.0
Transpower New Investment Contract (NIC)	4,178.4
Finance to pay a NIC or similar contract	Nil
System Operator Services	Nil
Total actual pass-through cost	78,133.0

Recoverable costs

Table 13, below, shows the actual recoverable costs for the assessment period

Table 13: Recoverable costs for the assessment period

Actual recoverable costs	Actual (\$000)
IRIS incentive adjustment (Opex and Capex)	(10,292.0)
Avoided liability due to purchasing transmission assets from Transpower	Nil
Claw-back applied under s54K(3) or s53ZB(3)	Nil
Standard application fee for a CPP proposal	Nil
Commerce Commission assessment fee for a CPP proposal	Nil
Verifier fee under a CPP proposal	Nil
Audit and assurance report for a CPP proposal	Nil
Engineer fee associated with proposed physical asset life	Nil
Reopener event allowance	Nil
Extended reserve allowance	Nil
Quality incentive adjustment	879.0
Engineer fee associated with quality standard variation proposal	Nil
Urgent project allowance	Nil
Wash-up drawdown amount	13,418
Fire and Emergency Management New Zealand (FENZ) Levies	153.3
Innovation and non-traditional solutions allowance	825
Total actual recoverable costs	4,983.3

APPENDIX B – ACTUAL REVENUE FROM LINE CHARGES

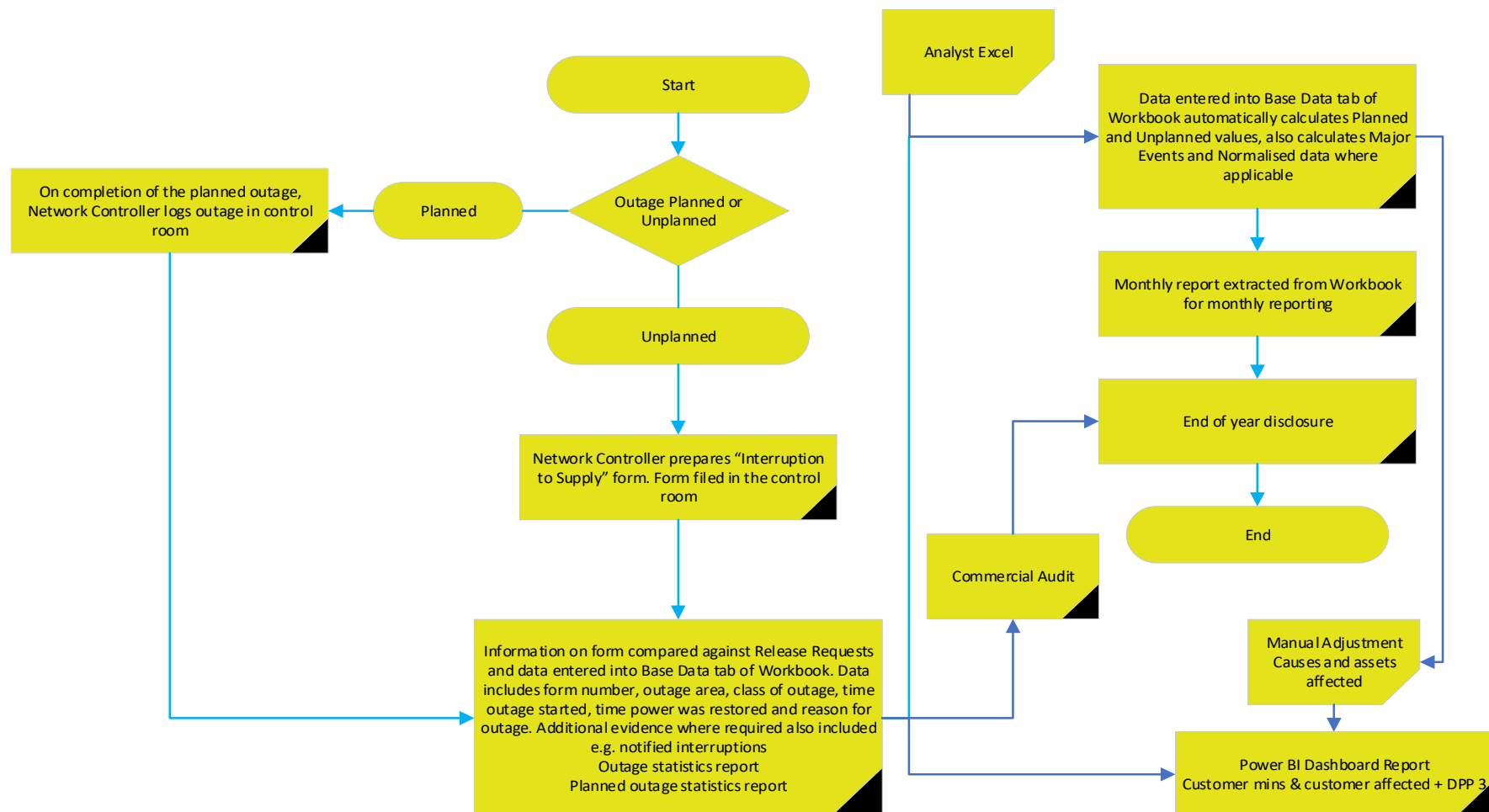
The actual prices and quantities for actual revenue from line charges for the first assessment period.

Description	Price Component Code	Delivery Price	Unit of measure	Days Applicable	Quantity	Revenue (\$)
Streetlighting						
Fixed charge	LIGFXD	\$ 0.0789	\$/lamp/day	365	53,903	\$ 1,552,567
Residential Low User						
<i>Uncontrolled Charges</i>						
Residential Connection - Fixed Daily Charge - Uncontrolled	URESUFXD	\$ 0.7500	\$/con/day	365	26,158	\$ 7,160,639
Weekends - Uncontrolled	URESUWKD	\$ 0.03913	\$/kWh		47,892,366	\$ 1,874,034
Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm) - Uncontrolled	URESUP	\$ 0.15611	\$/kWh		53,880,815	\$ 8,411,325
Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm) - Uncontrolled	URESUSH	\$ 0.09101	\$/kWh		37,182,897	\$ 3,384,016
Off Peak (Mon to Fri, 10:00pm to 3:00am) - Uncontrolled	URESUOP	\$ 0.00721	\$/kWh		26,340,619	\$ 189,911
Super Off Peak (Anytime between 3:00am to 5:00am) - Uncontrolled	URESUSOP	\$ -	\$/kWh		10,472,151	\$ -
<i>Controlled Charges</i>						
Residential Connection - Fixed Daily Charge - Controlled	RESCFXD	\$ 0.6078	\$/con/day	365	131,903	\$ 29,262,779
Weekends - Controlled	RESCWKD	\$ 0.03913	\$/kWh		261,452,015	\$ 10,230,641
Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm) - Controlled	RESCP	\$ 0.15611	\$/kWh		288,425,790	\$ 45,026,109
Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm) - Controlled	RESCSH	\$ 0.09101	\$/kWh		193,106,916	\$ 17,574,660
Off Peak (Mon to Fri, 10:00pm to 3:00am) - Controlled	RESCOP	\$ 0.00721	\$/kWh		154,078,098	\$ 1,110,891
Super Off Peak (Anytime between 3:00am to 5:00am) - Controlled	RESCSOP	\$ -	\$/kWh		47,745,085	\$ -
Residential Standard User						
<i>Uncontrolled Charges</i>						
Residential Connection - Fixed Daily Charge - Uncontrolled	RSUUFXD	\$ 1.1613	\$/con/day	365	7,736	\$ 3,278,932
Weekends - Uncontrolled	RSUUWKD	\$ 0.03109	\$/kWh		19,593,007	\$ 609,146
Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm) - Uncontrolled	RSUUP	\$ 0.12458	\$/kWh		23,960,389	\$ 2,984,984
Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm) - Uncontrolled	RSUUSH	\$ 0.07260	\$/kWh		17,092,169	\$ 1,240,894
Off Peak (Mon to Fri, 10:00pm to 3:00am) - Uncontrolled	RSUUOP	\$ 0.00582	\$/kWh		10,938,825	\$ 63,664
Super Off Peak (Anytime between 3:00am to 5:00am) - Uncontrolled	RSUUSOP	\$ -	\$/kWh		4,355,468	\$ -
<i>Controlled Charges</i>						
Residential Connection - Fixed Daily Charge - Controlled	RSCCFXD	\$ 1.0191	\$/con/day	365	35,746	\$ 13,296,159
Weekends - Controlled	RSCCWKD	\$ 0.03109	\$/kWh		112,121,117	\$ 3,485,850
Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm) - Controlled	RSCCP	\$ 0.12458	\$/kWh		128,751,003	\$ 16,039,796
Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm) - Controlled	RSCCSH	\$ 0.07260	\$/kWh		82,394,716	\$ 5,981,870
Off Peak (Mon to Fri, 10:00pm to 3:00am) - Controlled	RSCCOP	\$ 0.00582	\$/kWh		61,397,659	\$ 357,334
Super Off Peak (Anytime between 3:00am to 5:00am) - Controlled	RSCCSOP	\$ -	\$/kWh		22,485,323	\$ -
Small General Connections						
<i>Uncontrolled Charges</i>						
Small Connection up to 15 kVA - Fixed Daily Charge - Uncontrolled	UGENG1UFXD	\$ 1.5338	\$/con/day	365	7,973	\$ 4,463,609
Weekends - Uncontrolled	UGENG1UWKD	\$ 0.02550	\$/kWh		14,380,941	\$ 366,713
Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm) - Uncontrolled	UGENG1UP	\$ 0.10216	\$/kWh		19,174,374	\$ 1,958,857
Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm) - Uncontrolled	UGENG1USH	\$ 0.05953	\$/kWh		18,692,967	\$ 1,112,789
Off Peak (Mon to Fri, 10:00pm to 3:00am) - Uncontrolled	UGENG1UOP	\$ 0.00477	\$/kWh		7,140,429	\$ 34,046
Super Off Peak (Anytime between 3:00am to 5:00am) - Uncontrolled	UGENG1USOP	\$ -	\$/kWh		3,486,682	\$ -
<i>Controlled Charges</i>						
Small Connection up to 15 kVA - Fixed Daily Charge - Controlled	GENGC1CFXD	\$ 1.3967	\$/con/day	365	2,092	\$ 1,066,606
Weekends - Controlled	GENGC1CWKD	\$ 0.02550	\$/kWh		5,352,379	\$ 136,486
Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm) - Controlled	GENGC1CP	\$ 0.10216	\$/kWh		6,830,516	\$ 697,805
Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm) - Controlled	GENGC1CSH	\$ 0.05953	\$/kWh		5,587,596	\$ 332,630
Off Peak (Mon to Fri, 10:00pm to 3:00am) - Controlled	GENGC1COP	\$ 0.00477	\$/kWh		2,741,837	\$ 13,078
Super Off Peak (Anytime between 3:00am to 5:00am) - Controlled	GENGC1CSOP	\$ -	\$/kWh		1,179,049	\$ -
Medium General Connections						
<i>Uncontrolled Charges</i>						
Medium Connection 16 kVA up to 69 kVA - Fixed Daily Charge - Uncontrolled	UGENG2UFXD	\$ 2.7204	\$/con/day	365	10,159	\$ 10,087,465
Weekends - Uncontrolled	UGENG2UWKD	\$ 0.02124	\$/kWh		45,929,257	\$ 975,536
Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm) - Uncontrolled	UGENG2UP	\$ 0.08511	\$/kWh		71,485,079	\$ 6,084,097
Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm) - Uncontrolled	UGENG2USH	\$ 0.04961	\$/kWh		74,142,633	\$ 3,678,216
Off Peak (Mon to Fri, 10:00pm to 3:00am) - Uncontrolled	UGENG2UOP	\$ 0.00398	\$/kWh		21,219,164	\$ 84,449
Super Off Peak (Anytime between 3:00am to 5:00am) - Uncontrolled	UGENG2USOP	\$ -	\$/kWh		10,686,047	\$ -
<i>Controlled Charges</i>						
Medium Connection 16 kVA up to 69 kVA - Fixed Daily Charge - Controlled	GENGC2CFXD	\$ 2.5840	\$/con/day	365	1,604	\$ 1,512,833
Weekends - Controlled	GENGC2CWKD	\$ 0.02124	\$/kWh		9,710,854	\$ 206,259
Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm) - Controlled	GENGC2CP	\$ 0.08511	\$/kWh		12,731,779	\$ 1,083,602
Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm) - Controlled	GENGC2CSH	\$ 0.04961	\$/kWh		12,579,039	\$ 624,047
Off Peak (Mon to Fri, 10:00pm to 3:00am) - Controlled	GENGC2COP	\$ 0.00398	\$/kWh		4,500,048	\$ 17,910
Super Off Peak (Anytime between 3:00am to 5:00am) - Controlled	GENGC2CSOP	\$ -	\$/kWh		2,347,725	\$ -
Large General Connections						
<i>Uncontrolled Charges</i>						
Large Connection >70 kVA - Fixed Daily Charge - Uncontrolled	UGENG3UFXD	\$ 11.9824	\$/con/day	365	3,385	\$ 14,803,581
Weekends - Uncontrolled	UGENG3UWKD	\$ 0.01755	\$/kWh		82,831,219	\$ 1,453,689
Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm) - Uncontrolled	UGENG3UP	\$ 0.07033	\$/kWh		128,100,943	\$ 9,009,339
Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm) - Uncontrolled	UGENG3USH	\$ 0.04099	\$/kWh		126,443,806	\$ 5,182,932
Off Peak (Mon to Fri, 10:00pm to 3:00am) - Uncontrolled	UGENG3UOP	\$ 0.00329	\$/kWh		42,570,866	\$ 140,058
Super Off Peak (Anytime between 3:00am to 5:00am) - Uncontrolled	UGENG3USOP	\$ -	\$/kWh		22,044,440	\$ -
<i>Controlled Charges</i>						
Large Connection >70 kVA - Fixed Daily Charge - Controlled	GENGC3CFXD	\$ 11.8382	\$/con/day	365	377	\$ 1,629,512
Weekends - Controlled	GENGC3CWKD	\$ 0.01755	\$/kWh		10,032,658	\$ 176,073
Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm) - Controlled	GENGC3CP	\$ 0.07033	\$/kWh		12,054,234	\$ 847,774
Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm) - Controlled	GENGC3CSH	\$ 0.04099	\$/kWh		12,376,172	\$ 507,299
Off Peak (Mon to Fri, 10:00pm to 3:00am) - Controlled	GENGC3COP	\$ 0.00329	\$/kWh		3,889,527	\$ 12,796
Super Off Peak (Anytime between 3:00am to 5:00am) - Controlled	GENGC3CSOP	\$ -	\$/kWh		2,230,802	\$ -

Description	Price Component Code	Delivery Price	Unit of measure	Days Applicable	Quantity	Revenue (\$)
Residential Two-way Power Flow						
Residential Connection Fixed Daily Charge	2WAYRESFXD	\$ 0.7500	\$/con/day	365	349	\$ 95,626
Residential Consumption Weekends	2WAYRESXWKD	\$ 0.03908	\$/kWh		785,590	\$ 30,701
Residential Consumption Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm)	2WAYRESXP	\$ 0.21883	\$/kWh		762,072	\$ 166,764
Residential Consumption Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm)	2WAYRESXSH	\$ 0.09998	\$/kWh		748,662	\$ 74,851
Residential Consumption Off Peak (Mon to Fri, 10:00pm to 3:00am)	2WAYRESXOP	\$ 0.00360	\$/kWh		686,357	\$ 2,471
Residential Consumption Super Off Peak (Anytime between 3:00am to 5:00am)	2WAYRESXSOP	\$ -	\$/kWh		453,764	\$ -
Residential Injection Weekends	2WAYRESIWKD	\$ -	\$/kWh		174,080	\$ -
Residential Injection Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm)	2WAYRESIP	\$ (0.14548)	\$/kWh		97,075	\$ -14,122
Residential Injection Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm)	2WAYRESISH	\$ -	\$/kWh		319,619	\$ -
Residential Injection Off Peak (Mon to Fri, 10:00pm to 3:00am)	2WAYRESIOP	\$ -	\$/kWh		2,419	\$ -
Residential Injection Super Off Peak (Anytime between 3:00am to 5:00am)	2WAYRESISOP	\$ -	\$/kWh		444	\$ -
Commercial Two-way Power Flow						
Commercial Connection Fixed Daily Charge	2WAYSMEFXD	\$ 1.4453	\$/con/day	365	6	\$ 3,405
Commercial Consumption Weekends	2WAYSMEXWKD	\$ 0.02520	\$/kWh		51,485	\$ 1,297
Commercial Consumption Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm)	2WAYSMEXP	\$ 0.19643	\$/kWh		89,634	\$ 17,607
Commercial Consumption Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm)	2WAYSMEXSH	\$ 0.06471	\$/kWh		81,655	\$ 5,284
Commercial Consumption Off Peak (Mon to Fri, 10:00pm to 3:00am)	2WAYSMEXOP	\$ 0.00236	\$/kWh		33,561	\$ 79
Commercial Consumption Super Off Peak (Anytime between 3:00am to 5:00am)	2WAYSMEXSOP	\$ -	\$/kWh		24,218	\$ -
Commercial Injection Weekends	2WAYSMEIWKD	\$ -	\$/kWh		43,963	\$ -
Commercial Injection Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm)	2WAYSMEIP	\$ (0.08036)	\$/kWh		30,858	\$ -2,480
Commercial Injection Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm)	2WAYSMEISH	\$ -	\$/kWh		59,995	\$ -
Commercial Injection Off Peak (Mon to Fri, 10:00pm to 3:00am)	2WAYSMEIOP	\$ -	\$/kWh		10	\$ -
Commercial Injection Super Off Peak (Anytime between 3:00am to 5:00am)	2WAYSMEISOP	\$ -	\$/kWh		18	\$ -
Irrigation Connections						
Capacity Charge	IRRCAP	\$ 0.6397	\$/kW/day*	182	77,139	\$ 8,981,073
Power factor correction rebate	IRRPFC	\$ (0.13588)	\$/kVAr/day*	182	23,146	\$ -572,390
Interruptibility rebate	IRRIRR	\$ (0.03365)	\$/kW/day*	182	49,162	\$ -301,075
Weekends	IRRWKD	\$ 0.01350	\$/kWh		26,157,690	\$ 353,129
Peak (Mon to Fri, 7:00am to 11:00am and 5:00pm to 10:00pm)	IRRP	\$ 0.05410	\$/kWh		25,239,120	\$ 1,365,436
Shoulder (Mon to Fri, 5:00am to 7:00am and 11:00am to 5:00pm)	IRRS	\$ 0.03152	\$/kWh		22,474,804	\$ 708,406
Off Peak (Mon to Fri, 10:00pm to 3:00am)	IRROP	\$ 0.00253	\$/kWh		14,250,827	\$ 36,054
Super Off Peak (Anytime between 3:00am to 5:00am)	IRRSOP	\$ -	\$/kWh		7,635,289	\$ -
* applied to 1 October to 31 March only						
Major Customer and Embedded Network Connections						
Fixed charge	MCFXD	\$ 23.8045	\$/con/day	365	423	\$ 3,674,855
Fixed charge (additional connections)	MCFXDA	\$ 17.85336	\$/con/day	365	130	\$ 844,462
Extra switches	EQESW	\$ 4.64187	\$/switch/day	365	113	\$ 191,455
11kV Metering equipment	EQMET	\$ 6.30819	\$/con/day	365	51	\$ 117,427
11kV Underground cabling	EQUGC	\$ 5.59405	\$/km/day	365	7	\$ 14,905
11kV Overhead lines	EQOHL	\$ 4.16578	\$/km/day	365	3	\$ 4,562
Transformer capacity	EQTFC	\$ 0.01403	\$/kVA/day	365	382,035	\$ 1,956,537
Peak charge (control period demand)	MCCPD	\$ 0.36643	\$/kVA/day	365	117,789	\$ 15,753,938
Nominated maximum demand	MCNMD	\$ 0.11813	\$/kVA/day	365	308,415	\$ 13,297,794
Metered maximum demand	MCMMMD	\$ 0.11128	\$/kVA/day	365	247,939	\$ 10,071,044
Directly Billed Large Capacity Customers						
Directly billed customer 1			\$/year			\$ 3,106,840
Directly billed customer 2			\$/year			\$ 1,767,320

APPENDIX C – POLICIES AND PROCEDURES FOR MEASURING PLANNED AND UNPLANNED INTERRUPTIONS

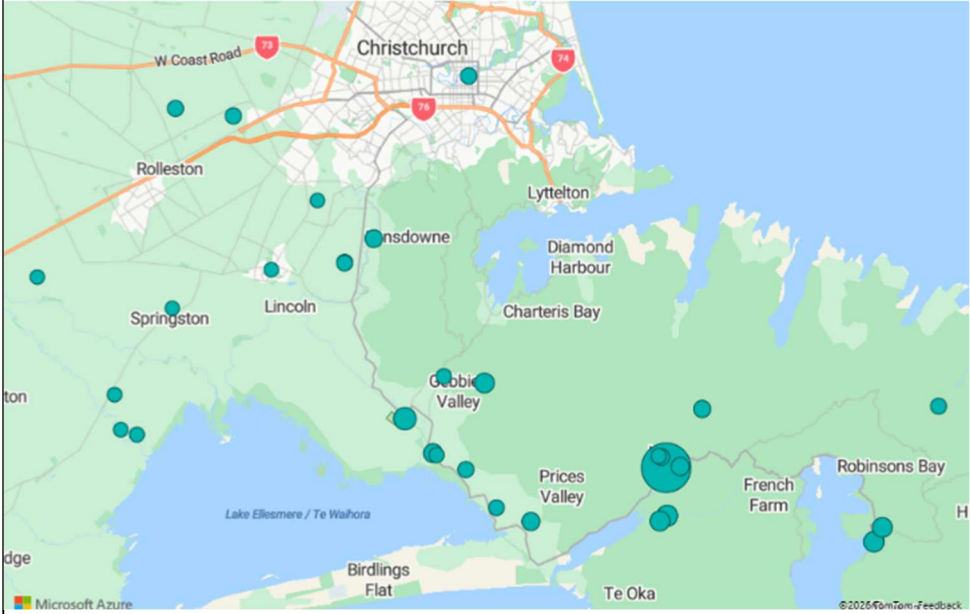
POLICIES AND PROCUDURES FOR MEASURING PLANNED AND UNPLANNED INTERRUPTIONS



APPENDIX D – SAIDI MAJOR EVENT INFORMATION

SAIDI Major Event 2026 - 1

Below is information relating to the 10-12 July 2025 SAIDI major event in accordance with clause 11.6(h) of the Determination.

Start date and time:	10/07/2025 08:30 pm	SAIDI value before replacements:	26.46
End date and time:	12/07/2025 08:30 pm	Replaced SAIDI value:	0.79
Location:	Banks Peninsula and surrounds. The majority of this event was localised to Little River and Motukarara along the Christchurch Akaroa Highway. Specific locations are included in the normalisation data below – The map below shows the vicinity and SAIDI impact of each unplanned interruption. 		
Main equipment involved:	11kV & 33kV Overhead Lines		
Cause of the event:	Adverse weather - orange wind warning / a sustained period of high winds and gusts over 120km/h brought down trees and branches – restorations remained hazardous for an extended time leaving many customers without power for over 24 hours.		

Orion's response:

Severe winds across the South Island caused 33 power outages across Orion's network, resulting in 8,605 customers being without power.

The high winds were worst in the Banks Peninsula area, with tree-fall damage to both 33kV supply lines from Motukarara Substation causing a loss-of-supply (LOS) for the entire Banks Peninsula area and reducing our ability to respond overnight. Safety of our crews meant the majority were withdrawn from the area. When winds receded, and crews could begin to safely access the area, all lines in the Peninsula were considered suspect and inspection was required to confirm their state, with repairs and restoration occurring as patrols were completed. The use of a helicopter to carry out some of the patrolling in remote or inaccessible areas sped up this process significantly. Orion crews worked in with emergency services, roading contractors and tree clearing specialists to gain access to the area. Further vegetation-related damage was found as crews patrolled and then carried out repairs. Co-ordination of crews was undertaken by our subsidiary Connetics' Project Management Office, in conjunction Orion's Control Room and Customer Support teams.

The crews deployed included Orion's own emergency response operators who are on permanent standby to restore service after outages; crews from Independent Lines Services (ILS) ILS and Orion's subsidiary Connetics were brought in to assist.

Trees falling on power lines were the main cause of the outages.

Orion took a triage approach to prioritising repairs:

1. Safety issues dealt with first
2. High voltage sub-transmission lines – the 33kV supply into Banks Peninsula needed to be repaired and restored to re-liven the zone substations at Little River, Duvauchelle and Diamond Harbour
3. Essential services dependent on power – water supplies
4. Townships with a significant number of residents

Mitigating factors that may have prevented or minimised the SAIDI major event, and proposed steps to mitigate the risk of future similar event:

Orion has an extensive tree management programme and regular communications to urban and rural landowners reminding them of their obligations under the tree regulations.

We have a proactive programme in place to trim trees within the corridor stated in the tree regulations. We also consult with landowners with trees that pose a risk to our assets but are outside the trim corridor. We run a two-year cyclic safety line clearance program across our entire high voltage network and a four-year cyclic safety line clearance program across our low voltage urban network.

During the past 12 months of the tree management programme, we have dedicated additional budget and resources to the most problematic areas of the network. This is expected to further reduce outages from trees in the future.

In addition to our tree management programme, we have instituted projects to replace aging high voltage line switches with remotely controlled switches, which has allowed Orion to begin deploying automation on the network to more quickly identify and isolate affected areas, then restore automatically where possible to reduce the number of customers without power.

Given the impact of trees on lines, and the lack of clarity and difficulty in enforcing the current regulations, Orion supports MBIE's review of the Electricity (Hazards from Trees) Regulations 2003.

SAIDI Major event normalisation

Supporting information for normalising the half-hourly SAIDI values for this SAIDI major event is given below:

SAIDI Unplanned Boundary	3.10
1/48th of the SAIDI Boundary value	0.06

Start date and time:	10/07/2025 8:30 pm	SAIDI value before replacements:	26.46
End date and time:	12/07/2025 8:30 pm	Replaced SAIDI value:	0.79
No. of half-hours:	96	Normalisation:	25.67

Date and time (half-hour commencing)	Sum SAIDI (half-hour)	Max SAIDI (rolling 24- hour)	Major event SAIDI	SAIDI assessed value	Normalised	Interruption Locations
10/07/2025 20:30	0.00	3.91	TRUE	0.00		
10/07/2025 21:00	0.00	3.91	TRUE	0.00		
10/07/2025 21:30	0.00	25.16	TRUE	0.00		
10/07/2025 22:00	0.00	25.16	TRUE	0.00		
10/07/2025 22:30	0.00	25.20	TRUE	0.00		
10/07/2025 23:00	0.00	25.69	TRUE	0.00		
10/07/2025 23:30	0.00	25.69	TRUE	0.00		
11/07/2025 0:00	0.00	25.69	TRUE	0.00		
11/07/2025 0:30	0.00	25.69	TRUE	0.00		
11/07/2025 1:00	0.00	25.70	TRUE	0.00		
11/07/2025 1:30	0.00	25.70	TRUE	0.00		
11/07/2025 2:00	0.00	25.70	TRUE	0.00		
11/07/2025 2:30	0.00	25.70	TRUE	0.00		
11/07/2025 3:00	0.00	25.70	TRUE	0.00		
11/07/2025 3:30	0.00	25.70	TRUE	0.00		
11/07/2025 4:00	0.00	26.45	TRUE	0.00		
11/07/2025 4:30	0.00	26.45	TRUE	0.00		
11/07/2025 5:00	0.00	26.45	TRUE	0.00		
11/07/2025 5:30	0.00	26.45	TRUE	0.00		
11/07/2025 6:00	0.00	26.45	TRUE	0.00		
11/07/2025 6:30	0.00	26.45	TRUE	0.00		
11/07/2025 7:00	0.00	26.45	TRUE	0.00		
11/07/2025 7:30	0.00	26.45	TRUE	0.00		
11/07/2025 8:00	0.00	26.45	TRUE	0.00		
11/07/2025 8:30	0.00	26.45	TRUE	0.00		

11/07/2025 9:00	0.00	26.45	TRUE	0.00		Madras St
11/07/2025 9:30	0.00	26.45	TRUE	0.00		
11/07/2025 10:00	0.00	26.45	TRUE	0.00		
11/07/2025 10:30	0.00	26.45	TRUE	0.00		
11/07/2025 11:00	0.00	26.45	TRUE	0.00		
11/07/2025 11:30	0.00	26.45	TRUE	0.00		
11/07/2025 12:00	0.00	26.45	TRUE	0.00		
11/07/2025 12:30	0.00	26.45	TRUE	0.00		
11/07/2025 13:00	0.00	26.45	TRUE	0.00		
11/07/2025 13:30	0.00	26.46	TRUE	0.00		
11/07/2025 14:00	0.00	26.46	TRUE	0.00		
11/07/2025 14:30	0.00	26.46	TRUE	0.00		
11/07/2025 15:00	0.21	26.46	TRUE	0.06	Normalised	Old Tai Tapu Rd
11/07/2025 15:30	0.12	26.46	TRUE	0.06	Normalised	Whites Rd
11/07/2025 16:00	0.02	26.46	TRUE	0.02		Whites Rd
11/07/2025 16:30	0.00	26.46	TRUE	0.00		
11/07/2025 17:00	0.64	26.46	TRUE	0.06	Normalised	Rue Grehan
11/07/2025 17:30	0.08	26.46	TRUE	0.06	Normalised	Dawsons Rd, Lake Rd South
11/07/2025 18:00	0.25	26.46	TRUE	0.06	Normalised	Christchurch Akaroa Rd
11/07/2025 18:30	0.12	26.46	TRUE	0.06	Normalised	Dawsons Rd, Western Valley Rd
11/07/2025 19:00	0.00	26.46	TRUE	0.00		
11/07/2025 19:30	0.58	26.46	TRUE	0.06	Normalised	Long Bay Rd, Newtons Rd
11/07/2025 20:00	1.91	26.46	TRUE	0.06	Normalised	Voss Rd, Motukarara Zone Sub, Lake Rd South, Christchurch Akaroa Rd, Prices Valley Rd
11/07/2025 20:30	0.00	26.46	TRUE	0.00		
11/07/2025 21:00	21.25	26.46	TRUE	0.06	Normalised	Little River Zone Sub, Kinloch Rd, Okuti Valley Rd
11/07/2025 21:30	0.00	26.46	TRUE	0.00		
11/07/2025 22:00	0.04	26.46	TRUE	0.04		Tancreds Rd
11/07/2025 22:30	0.49	26.46	TRUE	0.06	Normalised	McQueens Valley Rd, Millers Rd
11/07/2025 23:00	0.00	26.46	TRUE	0.00		
11/07/2025 23:30	0.00	26.46	TRUE	0.00		

12/07/2025 0:00	0.00	26.46	TRUE	0.00		
12/07/2025 0:30	0.02	26.46	TRUE	0.02		Voss Rd
12/07/2025 1:00	0.00	26.46	TRUE	0.00		
12/07/2025 1:30	0.00	26.46	TRUE	0.00		
12/07/2025 2:00	0.00	26.46	TRUE	0.00		
12/07/2025 2:30	0.00	26.46	TRUE	0.00		Motukarara Zone Sub
12/07/2025 3:00	0.00	26.46	TRUE	0.00		
12/07/2025 3:30	0.75	26.46	TRUE	0.06	Normalised	Little River Zone Sub
12/07/2025 4:00	0.00	26.46	TRUE	0.00		
12/07/2025 4:30	0.00	26.46	TRUE	0.00		
12/07/2025 5:00	0.00	26.46	TRUE	0.00		
12/07/2025 5:30	0.00	26.46	TRUE	0.00		
12/07/2025 6:00	0.00	26.46	TRUE	0.00		
12/07/2025 6:30	0.00	26.46	TRUE	0.00		
12/07/2025 7:00	0.00	26.46	TRUE	0.00		
12/07/2025 7:30	0.00	26.46	TRUE	0.00		South Belt
12/07/2025 8:00	0.00	26.46	TRUE	0.00		
12/07/2025 8:30	0.00	26.46	TRUE	0.00		
12/07/2025 9:00	0.00	26.46	TRUE	0.00		
12/07/2025 9:30	0.00	26.46	TRUE	0.00		Leeston Rd
12/07/2025 10:00	0.00	26.46	TRUE	0.00		
12/07/2025 10:30	0.00	26.46	TRUE	0.00		
12/07/2025 11:00	0.00	26.46	TRUE	0.00		
12/07/2025 11:30	0.00	26.46	TRUE	0.00		
12/07/2025 12:00	0.00	26.46	TRUE	0.00		
12/07/2025 12:30	0.00	26.46	TRUE	0.00		
12/07/2025 13:00	0.00	26.46	TRUE	0.00		Thomsons Rd
12/07/2025 13:30	0.00	26.46	TRUE	0.00		
12/07/2025 14:00	0.00	26.46	TRUE	0.00		
12/07/2025 14:30	0.00	26.46	TRUE	0.00		
12/07/2025 15:00	0.00	26.25	TRUE	0.00		
12/07/2025 15:30	0.00	26.12	TRUE	0.00		
12/07/2025 16:00	0.00	26.10	TRUE	0.00		
12/07/2025 16:30	0.00	26.10	TRUE	0.00		
12/07/2025 17:00	0.00	25.47	TRUE	0.00		
12/07/2025 17:30	0.00	25.39	TRUE	0.00		
12/07/2025 18:00	0.00	25.14	TRUE	0.00		
12/07/2025 18:30	0.00	25.03	TRUE	0.00		

12/07/2025 19:00	0.00	25.03	TRUE	0.00
12/07/2025 19:30	0.00	24.45	TRUE	0.00
12/07/2025 20:00	0.00	22.54	TRUE	0.00
12/07/2025 20:30	0.00	22.54	TRUE	0.00

Potential Extreme Event

As noted in section 2.4.4, above, Orion experienced a *potential* extreme event concurrent with the major event occurring on 10-12 July 2025 (details above). 'Major external factors' are excluded from the extreme event assessment and include, among other things, a 'natural disaster'. A 'natural disaster' is defined to include a 'severe weather event'.

A 'severe weather event' is not defined in the Determination or the IMs, and we have had to look to other sources to objectively define such an event. The Met Service categorises severe weather warnings as "orange" or "red" depending on severity, and an orange warning was in force for Banks Peninsula for the 6-hour period from 8pm on 11 July 2025 to 2am on 12 July 2025.

The Met Service's criteria for a severe weather warning includes:

- gales with a minimum mean speed of 90km/h; or
- wind gusts exceeding 110km/h.

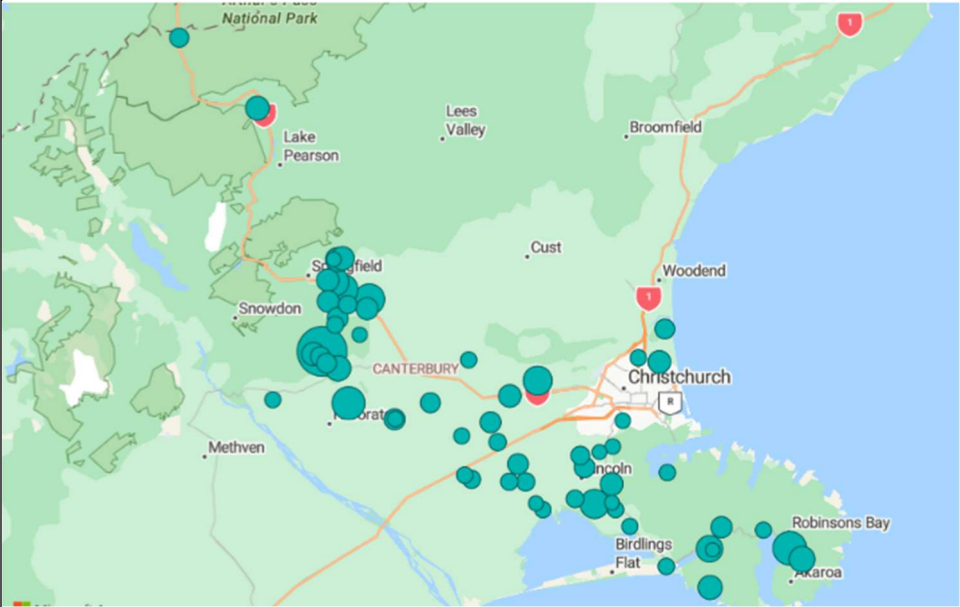
Orion obtained data from the Earth Sciences New Zealand Sugar Loaf weather station, located on Banks Peninsula, recorded a maximum wind gust of 33.44m/s on 11 July 2025, equating to 120.4km/h (above the Met Service severe weather threshold). The mean windspeed for 11 July 2025 was recorded at 18.67m/s, equating to 67.2km/h.

We consider that the 'severe weather event' wind gust criteria is met, and the 'natural disaster' limb of the 'major external event' exception is triggered, for the following reasons (considered as a whole):

1. We have based our assessment on an independent 'severe weather' framework (Met Service);
2. An 'orange' severe weather warning was in effect for Banks Peninsula for the 6-hour period from 8pm on 11 July 2025 to 2am on 12 July 2025;
3. The largest contributing interruption to the *potential* Extreme Event on 11 July 2025 (4.63 million customer minutes) was a complete loss of supply to Little River zone substation, located on Banks Peninsula, from 9:11pm - within the warning period;
4. The maximum wind gust recorded was 120.4km/h (33.44m/s) and exceeded the Met Service's extreme weather threshold. While the Sugar Loaf weather station does not report the time of the maximum daily wind gust, we consider it improbable that it was recorded outside the warning period;
5. While the mean wind speed recorded on 11 July was 22.8km/h below the Met Service extreme weather threshold, the mean is measured over the full day (24hr). When it is considered that the alert period covered just 4 hours of 11 July, and that the peak gust exceeded 120km/h, it is possible if not likely, that the 90km/h threshold was exceeded during the alert period.

SAIDI Major Event 2026 - 2

Below is information relating to the 22-24 October 2025 SAIDI major event in accordance with clause 11.6(h) of the Determination.

Start date and time:	22/10/2025 09:30 am	SAIDI value before replacements:	4.65
End date and time:	24/10/2025 07:30 am	Replaced SAIDI value:	0.89
Location:	Foothills, Central Plains and Banks Peninsula. The majority of this event was localised across the foothills but extended across the plans and over to Akaroa. Specific locations are included in the normalisation data below – The map below shows the vicinity and SAIDI impact of each unplanned interruption. 		
Main equipment involved:	11kV Overhead Lines		
Cause of the event:	Adverse weather - red wind warning / a sustained period of severe winds and gusts over 150km/h brought down trees and branches across the network – restorations remained hazardous for an extended time leaving many customers without power for over 12 hours.		
Orion's response:	Severe winds across the South Island caused 66 power outages across Orion's network, resulting in 3,691 customers being without power. The Met Service issued a red wind warning for Christchurch and the Canterbury Plains and, because of this, Orion stood up its CIMS team in preparation for the event. This team helped prepare and manage the incident, and controllers and field operators adjusted their rosters to ensure extra staff were		

available when needed. When the high winds arrived, it was necessary to stop the majority of our work and withdraw our field crews from the rural areas to ensure the safety of staff. Where possible, emergency response operators continued to isolate damaged areas in preparation for repairs. Once safe to do so, Orion despatched crews to undertake repairs to its damaged lines, working in with emergency services and on-the-ground tree clearing specialists. Co-ordination of crews was undertaken by the CIMS team and the Project Management Office of our subsidiary, Connetics, in conjunction Orion's Control Room and Customer Support teams.

The battery of crews deployed included Orion's own emergency response operators who are on permanent standby to restore service after outages; crews from our subsidiary, Connetics, and additional contractors' crews who were brought in from other areas to assist.

Trees falling on power lines and wind-blown vegetation were the main cause of the outages.

Orion took a triage approach to prioritising repairs:

1. Safety issues dealt with first
2. High voltage sub-transmission lines – 33kV
3. Essential services dependent on power – water supplies
4. Townships with a significant number of residents

Mitigation factors that may have prevented or minimised the SAIDI major event, and proposed steps to mitigate the risk of future similar event:

Orion has an extensive tree management programme and regular communications to urban and rural landowners reminding them of their obligations under the tree regulations.

We have a proactive programme in place to trim trees within the corridor stated in the tree regulations. We also consult with landowners with trees that pose a risk to our assets but are outside the trim corridor. We run a two-year cyclic safety line clearance program across our entire high voltage network and a four-year cyclic safety line clearance program across our low voltage urban network.

During the past 12 months of the tree management programme, we have dedicated additional budget and resources to the most problematic areas of the network. This is expected to further reduce outages from trees in the future.

In addition to our tree management programme, we have instituted projects to replace aging high voltage lines switches with remotely controlled switches, which has allowed Orion to begin deploying automation on the network to more quickly identify and isolate affected areas, then restore automatically where possible to reduce the number of customers without power.

Given the impact of trees on lines, and the lack of clarity and difficulty in enforcing the current regulations, Orion supports MBIE's review of the Electricity (Hazards from Trees) Regulations 2003.

SAIDI Major event normalisation

Supporting information for normalising the half-hourly SAIDI values for this SAIDI major event is given below:

SAIDI Unplanned Boundary	3.10
1/48th of the SAIDI Boundary value	0.06

Start date and time:	22/10/2025 9:30 am	SAIDI value before replacements:	4.65
End date and time:	24/10/2025 7:30 am	Replaced SAIDI value:	0.89
No. of half-hours:	93	Normalisation:	3.76

Date and time (half-hour commencing)	Sum SAIDI (half-hour)	Max SAIDI (rolling 24- hour)	Major event SAIDI	SAIDI assessed value	Normalised	Interruption Locations
22/10/2025 9:30	0.00	3.34	TRUE	0.00		
22/10/2025 10:00	0.00	3.42	TRUE	0.00		Christchurch Akaroa Rd
22/10/2025 10:30	0.00	3.45	TRUE	0.00		
22/10/2025 11:00	0.00	3.62	TRUE	0.00		
22/10/2025 11:30	0.00	4.12	TRUE	0.00		
22/10/2025 12:00	0.00	4.14	TRUE	0.00		
22/10/2025 12:30	0.00	4.19	TRUE	0.00		
22/10/2025 13:00	0.00	4.32	TRUE	0.00		Lakelands Rd
22/10/2025 13:30	0.00	4.32	TRUE	0.00		
22/10/2025 14:00	0.00	4.49	TRUE	0.00		
22/10/2025 14:30	0.00	4.53	TRUE	0.00		
22/10/2025 15:00	0.01	4.53	TRUE	0.01		Two Chain Rd

22/10/2025 15:30 0.00 4.53 TRUE 0.00

22/10/2025 16:00	0.00	4.53	TRUE	0.00
22/10/2025 16:30	0.00	4.53	TRUE	0.00
22/10/2025 17:00	0.00	4.53	TRUE	0.00
22/10/2025 17:30	0.00	4.62	TRUE	0.00
22/10/2025 18:00	0.00	4.62	TRUE	0.00
22/10/2025 18:30	0.00	4.63	TRUE	0.00
22/10/2025 19:00	0.00	4.63	TRUE	0.00
22/10/2025 19:30	0.00	4.63	TRUE	0.00
22/10/2025 20:00	0.00	4.63	TRUE	0.00
22/10/2025 20:30	0.00	4.63	TRUE	0.00
22/10/2025 21:00	0.00	4.64	TRUE	0.00
22/10/2025 21:30	0.00	4.64	TRUE	0.00
22/10/2025 22:00	0.00	4.64	TRUE	0.00
22/10/2025 22:30	0.00	4.64	TRUE	0.00
22/10/2025 23:00	0.00	4.64	TRUE	0.00
22/10/2025 23:30	0.00	4.64	TRUE	0.00
23/10/2025 0:00	0.00	4.64	TRUE	0.00
23/10/2025 0:30	0.00	4.64	TRUE	0.00
23/10/2025 1:00	0.00	4.64	TRUE	0.00
23/10/2025 1:30	0.00	4.64	TRUE	0.00
23/10/2025 2:00	0.00	4.64	TRUE	0.00
23/10/2025 2:30	0.00	4.64	TRUE	0.00
23/10/2025 3:00	0.00	4.64	TRUE	0.00

Hayes Rd

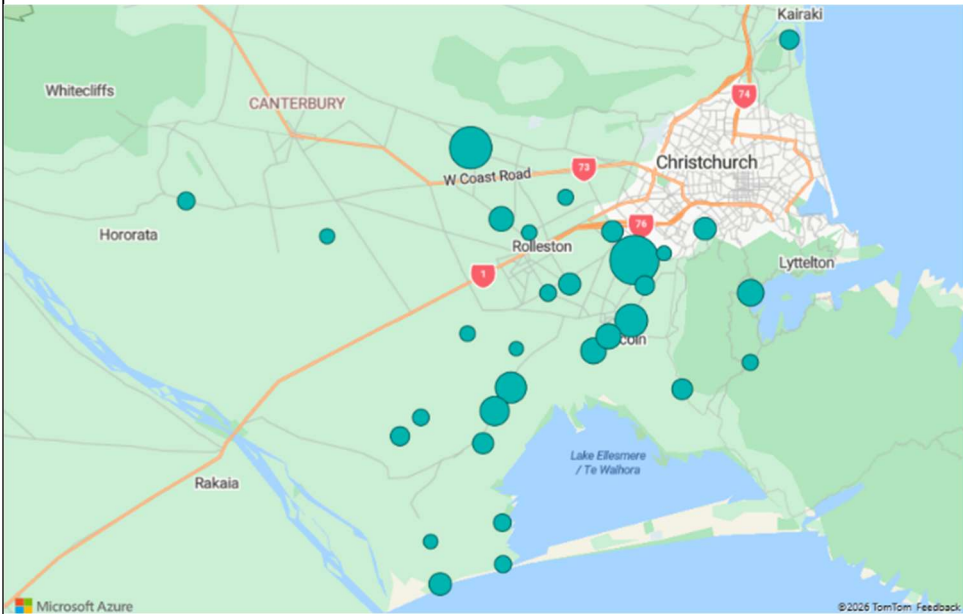
23/10/2025 3:30	0.00	4.64	TRUE	0.00		
23/10/2025 4:00	0.00	4.64	TRUE	0.00		
23/10/2025 4:30	0.00	4.64	TRUE	0.00		
23/10/2025 5:00	0.00	4.64	TRUE	0.00		
23/10/2025 5:30	0.07	4.64	TRUE	0.06	Normalised	Torlesse Rd
23/10/2025 6:00	0.00	4.64	TRUE	0.00		
23/10/2025 6:30	0.00	4.64	TRUE	0.00		
23/10/2025 7:00	0.00	4.64	TRUE	0.00		
23/10/2025 7:30	0.68	4.64	TRUE	0.06	Normalised	Domain Rd, Rubicon Rd, Pocock Rd, Kowai Rd, West Coast Rd
23/10/2025 8:00	1.59	4.64	TRUE	0.06	Normalised	Flagpole Rd, Dalethorpe Rd, Philip St, Whitecliffs Rd, Springfield Rd, Pig Saddle Rd, Bluff Rd
23/10/2025 8:30	0.27	4.64	TRUE	0.06	Normalised	Old Tai Tapu Rd, Dalys Rd, Gerkins Rd
23/10/2025 9:00	0.72	4.64	TRUE	0.06	Normalised	Selwyn Rd, Barrs Rd, Bealey Rd, Wards Rd, Bluff Rd
23/10/2025 9:30	0.08	4.64	TRUE	0.06	Normalised	Ellesmere Rd, Warrens Rd
23/10/2025 10:00	0.03	4.64	TRUE	0.03		Greenpark Rd, Corbetts Rd, Boundary Creek Rd
23/10/2025 10:30	0.17	4.64	TRUE	0.06	Normalised	West Coast Rd, Long Bay Rd, Birchs Rd, Highfield Rd
23/10/2025 11:00	0.51	4.64	TRUE	0.06	Normalised	Okuti Valley Rd, Old Le Bons Track
23/10/2025 11:30	0.01	4.64	TRUE	0.01		Boundary Creek Rd, Christchurch Akaroa Rd, Dalys Rd
23/10/2025 12:00	0.05	4.64	TRUE	0.05		Chamberlains Rd, Puaha Rd
23/10/2025 12:30	0.13	4.64	TRUE	0.06	Normalised	Selwyn Rd, Old West Coast Rd, West Coast Rd
23/10/2025 13:00	0.00	4.64	TRUE	0.00		
23/10/2025 13:30	0.18	4.64	TRUE	0.06	Normalised	Puaha Rd, Old West Coast Rd

23/10/2025 14:00	0.04	4.64	TRUE	0.04		Charteris Bay Rd, Lower Styx Rd, Christchurch Akaroa Rd
23/10/2025 14:30	0.00	4.64	TRUE	0.00		Christchurch Akaroa Rd, Rockwood Rd
23/10/2025 15:00	0.01	4.64	TRUE	0.01		Lower Styx Rd, Sparks Rd, Warrens Rd
23/10/2025 15:30	0.00	4.64	TRUE	0.00		Christchurch Akaroa Rd
23/10/2025 16:00	0.00	4.64	TRUE	0.00		
23/10/2025 16:30	0.00	4.64	TRUE	0.00		
23/10/2025 17:00	0.09	4.64	TRUE	0.06	Normalised	Harrisons Rd
23/10/2025 17:30	0.00	4.64	TRUE	0.00		Christchurch Akaroa Rd
23/10/2025 18:00	0.00	4.64	TRUE	0.00		Radcliffe Rd
23/10/2025 18:30	0.00	4.64	TRUE	0.00		
23/10/2025 19:00	0.00	4.64	TRUE	0.00		
23/10/2025 19:30	0.00	4.64	TRUE	0.00		
23/10/2025 20:00	0.00	4.64	TRUE	0.00		Okuti Valley Rd
23/10/2025 20:30	0.01	4.64	TRUE	0.01		Puaha Rd
23/10/2025 21:00	0.00	4.64	TRUE	0.00		
23/10/2025 21:30	0.00	4.64	TRUE	0.00		
23/10/2025 22:00	0.00	4.64	TRUE	0.00		
23/10/2025 22:30	0.00	4.64	TRUE	0.00		
23/10/2025 23:00	0.00	4.64	TRUE	0.00		
23/10/2025 23:30	0.00	4.64	TRUE	0.00		
24/10/2025 0:00	0.00	4.64	TRUE	0.00		
24/10/2025 0:30	0.00	4.64	TRUE	0.00		
24/10/2025 1:00	0.00	4.64	TRUE	0.00		
24/10/2025 1:30	0.00	4.64	TRUE	0.00		
24/10/2025 2:00	0.00	4.64	TRUE	0.00		
24/10/2025 2:30	0.00	4.64	TRUE	0.00		
24/10/2025 3:00	0.00	4.64	TRUE	0.00		
24/10/2025 3:30	0.00	4.64	TRUE	0.00		
24/10/2025 4:00	0.00	4.64	TRUE	0.00		
24/10/2025 4:30	0.00	4.64	TRUE	0.00		
24/10/2025 5:00	0.00	4.64	TRUE	0.00		Selwyn Lake Rd
24/10/2025 5:30	0.00	4.57	TRUE	0.00		
24/10/2025 6:00	0.00	4.57	TRUE	0.00		

24/10/2025 6:30	0.00	4.57	TRUE	0.00
24/10/2025 7:00	0.00	4.57	TRUE	0.00
24/10/2025 7:30	0.00	3.90	TRUE	0.00

SAIDI Major Event 2026 - 3

Below is information relating to the 26-28 October 2025 SAIDI major event in accordance with clause 11.6(h) of the Determination.

Start date and time:	26/10/2025 10:00 pm	SAIDI value before replacements:	4.14
End date and time:	28/10/2025 09:00 pm	Replaced SAIDI value:	0.51
Location:	Central Plains around Lincoln and Prebbleton. Much of this event was localised across the central plains and into the urban outskirts Specific locations are included in the normalisation data below – The map below shows the vicinity and SAIDI impact of each unplanned interruption. 		
Main equipment involved:	11kV Overhead Lines		
Cause of the event:	Adverse weather - orange wind warning & generally gusty conditions / a sustained period of gusting winds up to 120km/h brought down trees and branches across the network – The major contribution to this event was vegetation across the lines causing a loss of supply at Prebbleton.		
Orion's response:	Gusty winds across the Canterbury Plains caused 32 power outages across Orion's network, resulting in 7,800 customers being without power. The high winds reached dangerous levels in some areas over this storm, and Orion withdrew field crews where and as needed to ensure their safety. Where winds and access allowed, Orion's crews worked with emergency services and roading contractors to gain access to inspect, repair and		

restore lines. Orion staff liaised with the Project Management Office of our subsidiary, Connetics, to manage the storm response, in conjunction with Orion's Control Room and Customer Support teams.

The crews deployed included Orion's own emergency response operators, who are on permanent standby to restore service after outages, and crews from our subsidiary, Connetics.

Trees falling on power lines and wind-blown vegetation were the main cause of the outages, with an outage affecting the Prebbleton zone substation (caused by a tree branch on the main supply line to Prebbleton) being the main contributor.

Orion took a triage approach to prioritising repairs:

1. Safety issues dealt with first
2. High voltage sub-transmission lines – 33kV
3. Essential services dependent on power – water supplies
4. Townships with a significant number of residents

Mitigation factors that may have prevented or minimised the SAIDI major event, and proposed steps to mitigate the risk of future similar event:

Orion has an extensive tree management programme and regular communications to urban and rural landowners reminding them of their obligations under the tree regulations.

We have a proactive programme in place to trim trees within the corridor stated in the tree regulations. We also consult with landowners with trees that pose a risk to our assets but are outside the trim corridor. We run a two-year cyclic safety line clearance program across our entire high voltage network and a four-year cyclic safety line clearance program across our low voltage urban network.

During the past 12 months of the tree management programme, we have dedicated additional budget and resources to the most problematic areas of the network. This is expected to further reduce outages from trees in the future.

In addition to our tree management programme, we have instituted projects to replace aging high voltage line switches with remotely controlled switches, which has allowed Orion to begin deploying automation on the network to more quickly identify and isolate affected areas, then restore automatically where possible to reduce the number of customers without power.

Given the impact of trees on lines, and the lack of clarity and difficulty in enforcing the current regulations, Orion supports MBIE's review of the Electricity (Hazards from Trees) Regulations 2003.

SAIDI Major event normalisation

Supporting information for normalising the half-hourly SAIDI values for this SAIDI major event is given below:

SAIDI Unplanned Boundary	3.10
1/48th of the SAIDI Boundary value	0.06

Start date and time:	26/10/2025 10:00 pm	SAIDI value before replacements:	4.14
End date and time:	28/10/2025 9:00 pm	Replaced SAIDI value:	0.51
No. of half-hours:	95	Normalisation:	3.63

Date and time (half-hour commencing)	Sum SAIDI (half-hour)	Max SAIDI (rolling 24- hour)	Major event SAIDI	SAIDI assessed value	Normalised	Interruption Locations
26/10/2025 22:00	0.00	3.82	TRUE	0.00		
26/10/2025 22:30	0.00	3.91	TRUE	0.00		
26/10/2025 23:00	0.00	4.07	TRUE	0.00		
26/10/2025 23:30	0.00	4.08	TRUE	0.00		
27/10/2025 0:00	0.00	4.08	TRUE	0.00		
27/10/2025 0:30	0.00	4.08	TRUE	0.00		
27/10/2025 1:00	0.00	4.08	TRUE	0.00		
27/10/2025 1:30	0.00	4.08	TRUE	0.00		
27/10/2025 2:00	0.00	4.08	TRUE	0.00		
27/10/2025 2:30	0.00	4.08	TRUE	0.00		
27/10/2025 3:00	0.00	4.08	TRUE	0.00		
27/10/2025 3:30	0.00	4.08	TRUE	0.00		
27/10/2025 4:00	0.00	4.08	TRUE	0.00		
27/10/2025 4:30	0.00	4.08	TRUE	0.00		
27/10/2025 5:00	0.00	4.08	TRUE	0.00		
27/10/2025 5:30	0.00	4.08	TRUE	0.00		
27/10/2025 6:00	0.00	4.11	TRUE	0.00		
27/10/2025 6:30	0.00	4.12	TRUE	0.00		
27/10/2025 7:00	0.00	4.12	TRUE	0.00		
27/10/2025 7:30	0.00	4.12	TRUE	0.00		
27/10/2025 8:00	0.00	4.12	TRUE	0.00		
27/10/2025 8:30	0.00	4.13	TRUE	0.00		
27/10/2025 9:00	0.00	4.13	TRUE	0.00		
27/10/2025 9:30	0.00	4.13	TRUE	0.00		

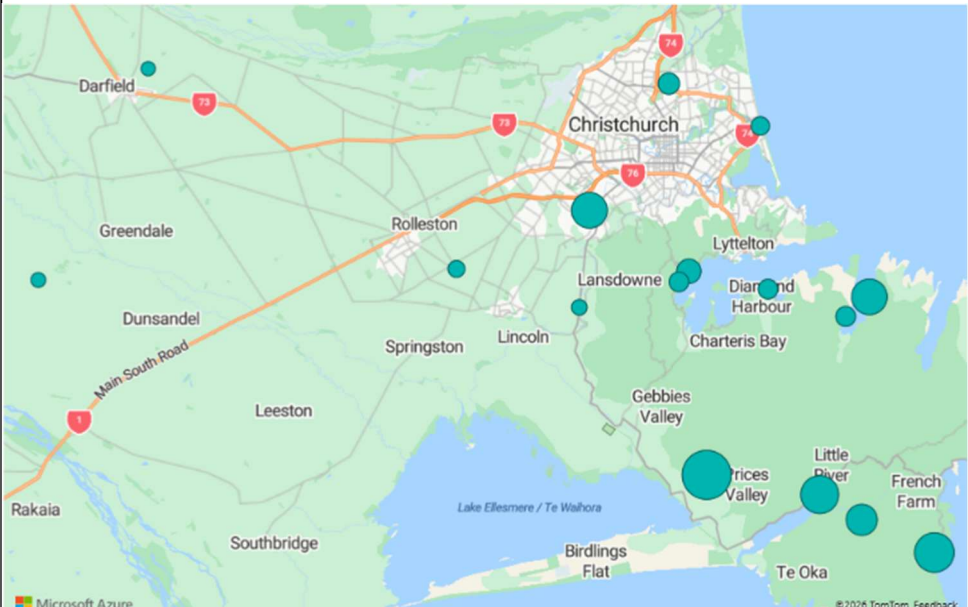
27/10/2025 10:00	0.14	4.13	TRUE	0.06	Normalised	Milltown Rd, Sargeants Rd
27/10/2025 10:30	0.05	4.13	TRUE	0.05		Christchurch Akaroa Rd
27/10/2025 11:00	0.00	4.13	TRUE	0.00		
27/10/2025 11:30	0.00	4.13	TRUE	0.00		
27/10/2025 12:00	0.00	4.13	TRUE	0.00		
27/10/2025 12:30	0.00	4.13	TRUE	0.00		
27/10/2025 13:00	0.00	4.13	TRUE	0.00		
27/10/2025 13:30	0.00	4.13	TRUE	0.00		
27/10/2025 14:00	0.00	4.13	TRUE	0.00		
27/10/2025 14:30	0.00	4.13	TRUE	0.00		
27/10/2025 15:00	0.00	4.13	TRUE	0.00		
27/10/2025 15:30	0.00	4.13	TRUE	0.00		
27/10/2025 16:00	0.01	4.13	TRUE	0.01		Drain Rd
27/10/2025 16:30	0.00	4.13	TRUE	0.00		
27/10/2025 17:00	0.00	4.13	TRUE	0.00		
27/10/2025 17:30	0.03	4.13	TRUE	0.03		Lincoln Rolleston Rd
27/10/2025 18:00	0.01	4.13	TRUE	0.01		Lincoln Rolleston Rd
27/10/2025 18:30	0.02	4.13	TRUE	0.02		Lincoln Rolleston Rd
27/10/2025 19:00	0.00	4.13	TRUE	0.00		
27/10/2025 19:30	0.00	4.13	TRUE	0.00		
27/10/2025 20:00	0.00	4.13	TRUE	0.00		
27/10/2025 20:30	0.00	4.13	TRUE	0.00		
27/10/2025 21:00	0.43	4.13	TRUE	0.06	Normalised	Beachcroft Rd, Drain Rd, Selwyn Lake Rd
27/10/2025 21:30	3.14	4.13	TRUE	0.06	Normalised	Leeston Rd, Halkett Rd, Hoskyns Rd, Sparks Rd, Poplar Ln, Prebbleton Zone Sub, Lower Styx Rd, Lincoln Tai Tapu Rd
27/10/2025 22:00	0.08	4.13	TRUE	0.06	Normalised	Robinsons Rd, Trents Rd
27/10/2025 22:30	0.16	4.13	TRUE	0.06	Normalised	Main Rd
27/10/2025 23:00	0.01	4.13	TRUE	0.01		Lower Lake Rd
27/10/2025 23:30	0.00	4.13	TRUE	0.00		
28/10/2025 0:00	0.00	4.13	TRUE	0.00		
28/10/2025 0:30	0.00	4.13	TRUE	0.00		
28/10/2025 1:00	0.00	4.13	TRUE	0.00		
28/10/2025 1:30	0.00	4.13	TRUE	0.00		Downies Rd

28/10/2025 2:00	0.00	4.13	TRUE	0.00	
28/10/2025 2:30	0.00	4.13	TRUE	0.00	
28/10/2025 3:00	0.00	4.13	TRUE	0.00	
28/10/2025 3:30	0.00	4.13	TRUE	0.00	
28/10/2025 4:00	0.00	4.13	TRUE	0.00	
28/10/2025 4:30	0.00	4.13	TRUE	0.00	Clintons Rd
28/10/2025 5:00	0.00	4.13	TRUE	0.00	
28/10/2025 5:30	0.03	4.13	TRUE	0.03	Southbridge Dunsan del Rd
28/10/2025 6:00	0.01	4.13	TRUE	0.01	Gullivers Rd
28/10/2025 6:30	0.00	4.13	TRUE	0.00	
28/10/2025 7:00	0.00	4.13	TRUE	0.00	
28/10/2025 7:30	0.00	4.13	TRUE	0.00	
28/10/2025 8:00	0.01	4.13	TRUE	0.01	Hororata Zone Sub
28/10/2025 8:30	0.00	4.13	TRUE	0.00	
28/10/2025 9:00	0.00	4.13	TRUE	0.00	
28/10/2025 9:30	0.00	4.13	TRUE	0.00	
28/10/2025 10:00	0.00	3.99	TRUE	0.00	
28/10/2025 10:30	0.00	3.95	TRUE	0.00	
28/10/2025 11:00	0.00	3.95	TRUE	0.00	
28/10/2025 11:30	0.00	3.95	TRUE	0.00	
28/10/2025 12:00	0.00	3.95	TRUE	0.00	
28/10/2025 12:30	0.00	3.95	TRUE	0.00	
28/10/2025 13:00	0.01	3.95	TRUE	0.01	Springston Rolleston Rd
28/10/2025 13:30	0.00	3.95	TRUE	0.00	Curraghs Rd, Chamberlains Rd
28/10/2025 14:00	0.00	3.95	TRUE	0.00	
28/10/2025 14:30	0.00	3.95	TRUE	0.00	
28/10/2025 15:00	0.00	3.95	TRUE	0.00	Corbetts Rd
28/10/2025 15:30	0.00	3.95	TRUE	0.00	
28/10/2025 16:00	0.00	3.95	TRUE	0.00	
28/10/2025 16:30	0.00	3.95	TRUE	0.00	
28/10/2025 17:00	0.00	3.95	TRUE	0.00	Curraghs Rd
28/10/2025 17:30	0.00	3.92	TRUE	0.00	
28/10/2025 18:00	0.00	3.90	TRUE	0.00	
28/10/2025 18:30	0.00	3.88	TRUE	0.00	
28/10/2025 19:00	0.00	3.88	TRUE	0.00	
28/10/2025 19:30	0.00	3.88	TRUE	0.00	

28/10/2025 20:00	0.00	3.88	TRUE	0.00
28/10/2025 20:30	0.00	3.88	TRUE	0.00
28/10/2025 21:00	0.00	3.46	TRUE	0.00

SAIDI Major Event 2026 – 4

Below is information relating to the 16-17 February 2026 SAIDI major event in accordance with clause 11.6(h) of the Determination.

Start date and time:	16/02/2026 06:30 am	SAIDI value before replacements:	3.86
End date and time:	17/02/2026 11:00 pm	Replaced SAIDI value:	0.53
Location:	Banks Peninsula. The majority of this event was localised across Banks Peninsula from Diamond Harbour to Little River and Wainui. Specific locations are included in the normalisation data below – The map below shows the vicinity and SAIDI impact of each unplanned interruption. 		
Main equipment involved:	11kV Overhead Lines and Poles.		
Cause of the event:	Adverse weather – orange rain warning / a sustained period of winds and rain up to 200mm over two days caused land slips and multiple tree faults across the peninsula – restorations remained hazardous for an extended time leaving some customers without power for over 24 hours.		
Orion's response:	Severe winds across the South Island caused 18 power outages across Orion's network, resulting in 2,961 customers being without power. As winds reached dangerous levels, combined with significant flooding and landslides, Orion withdrew its field crews from the area. After the high winds receded, and emergency services began to provide access, Orion despatched crews to undertake initial surveys of the area and repairs to its damaged lines, working in with emergency services and council roading contractors. There was		

significant roading damage in areas, which slowed our response. Once the weather had settled sufficiently, a helicopter was used to inspect otherwise inaccessible areas. Orion staff liaised with our service providers to co-ordinate crews, in conjunction with Orion's Control Room and Customer Support teams.

The crews deployed included Orion's own emergency response operators who are on permanent standby to restore service after outages and crews from our service delivery providers.

Trees falling on power lines, flooding and land slips were the main cause of the outages.

Orion took a triaged approach to prioritising repairs:

1. Safety issues dealt with first
2. High voltage sub-transmission lines – 33kV
3. Essential services dependent on power – water supplies
4. Townships with a significant number of residents

Mitigation factors that may have prevented or minimised the SAIDI major event, and proposed steps to mitigate the risk of future similar event:

Orion has an extensive tree management programme and regular communications to urban and rural landowners reminding them of their obligations under the tree regulations.

We have a proactive programme in place to trim trees within the corridor stated in the tree regulations. We also consult with landowners with trees that pose a risk to our assets but are outside the trim corridor. We run a two-year cyclic safety line clearance program across our entire high voltage network and a four-year cyclic safety line clearance program across our low voltage urban network.

During the past 12 months of the tree management programme, we have dedicated additional budget and resources to the most problematic areas of the network. This is expected to further reduce outages from trees in the future.

In addition to our tree management programme, we have instituted projects to replace aging high voltage line switches with remotely controlled switches, which has allowed Orion to begin deploying automation on the network to more quickly identify and isolate affected areas, then restore automatically where possible to reduce the number of customers without power.

Given the impact of trees on lines, and the lack of clarity and difficulty in enforcing the current regulations, Orion supports MBIE's review of the Electricity (Hazards from Trees) Regulations 2003.

SAIDI Major event normalisation

Supporting information for normalising the half-hourly SAIDI values for the extended SAIDI major event that took place during the assessment period:

SAIDI Unplanned Boundary	3.10
1/48th of the SAIDI Boundary value	0.06

Start date and time:	16/02/2026 6:00 am	SAIDI value before replacements:	3.86
End date and time:	17/02/2026 11:00 pm	Replaced SAIDI value:	0.53
No. of half-hours:	83	Normalisation:	3.33

Date and time (half-hour commencing)	Sum SAIDI (half-hour)	Max SAIDI (rolling 24- hour)	Major event SAIDI	SAIDI assessed value	Normalised	Interruption Locations
16/02/2026 6:00	0.00	3.71	TRUE	0.00		
16/02/2026 6:30	0.00	3.71	TRUE	0.00		
16/02/2026 7:00	0.00	3.71	TRUE	0.00		
16/02/2026 7:30	0.00	3.71	TRUE	0.00		
16/02/2026 8:00	0.00	3.71	TRUE	0.00		
16/02/2026 8:30	0.00	3.71	TRUE	0.00		Tai Tapu Rd
16/02/2026 9:00	0.45	3.71	TRUE	0.06	Normalised	Putiki Rd
16/02/2026 9:30	0.05	3.71	TRUE	0.05		Hills Rd
16/02/2026 10:00	0.00	3.71	TRUE	0.00		
16/02/2026 10:30	0.00	3.71	TRUE	0.00		
16/02/2026 11:00	0.00	3.71	TRUE	0.00		
16/02/2026 11:30	0.00	3.71	TRUE	0.00		
16/02/2026 12:00	0.00	3.71	TRUE	0.00		
16/02/2026 12:30	0.00	3.71	TRUE	0.00		
16/02/2026 13:00	0.00	3.71	TRUE	0.00		
16/02/2026 13:30	0.00	3.71	TRUE	0.00		
16/02/2026 14:00	0.00	3.71	TRUE	0.00		
16/02/2026 14:30	0.00	3.71	TRUE	0.00		
16/02/2026 15:00	0.01	3.71	TRUE	0.01		Lincoln Rolleston Rd
16/02/2026 15:30	0.00	3.71	TRUE	0.00		
16/02/2026 16:00	0.00	3.71	TRUE	0.00		
16/02/2026 16:30	0.00	3.71	TRUE	0.00		
16/02/2026 17:00	0.00	3.71	TRUE	0.00		
16/02/2026 17:30	0.00	3.71	TRUE	0.00		
16/02/2026 18:00	0.00	3.71	TRUE	0.00		

16/02/2026 18:30	0.00	3.71	TRUE	0.00		
16/02/2026 19:00	0.00	3.71	TRUE	0.00		
16/02/2026 19:30	0.00	3.71	TRUE	0.00		
16/02/2026 20:00	0.00	3.71	TRUE	0.00		
16/02/2026 20:30	0.00	3.71	TRUE	0.00		
16/02/2026 21:00	0.00	3.71	TRUE	0.00		
16/02/2026 21:30	0.00	3.71	TRUE	0.00		
16/02/2026 22:00	0.00	3.71	TRUE	0.00		
16/02/2026 22:30	0.00	3.71	TRUE	0.00		
16/02/2026 23:00	0.00	3.71	TRUE	0.00		
16/02/2026 23:30	0.85	3.71	TRUE	0.06	Normalised	Kinloch Rd, Reynolds Valley Rd
17/02/2026 0:00	0.00	3.71	TRUE	0.00		
17/02/2026 0:30	0.00	3.71	TRUE	0.00		
17/02/2026 1:00	0.00	3.71	TRUE	0.00		
17/02/2026 1:30	0.00	3.71	TRUE	0.00		
17/02/2026 2:00	0.00	3.71	TRUE	0.00		
17/02/2026 2:30	0.00	3.71	TRUE	0.00		
17/02/2026 3:00	1.23	3.71	TRUE	0.06	Normalised	Kaituna Valley Rd, Te Ra Cr
17/02/2026 3:30	0.00	3.71	TRUE	0.00		
17/02/2026 4:00	0.46	3.71	TRUE	0.06	Normalised	Balcain St
17/02/2026 4:30	0.00	3.71	TRUE	0.00		
17/02/2026 5:00	0.03	3.71	TRUE	0.03		Wharf Rd
17/02/2026 5:30	0.63	3.71	TRUE	0.06	Normalised	Wainui Rd
17/02/2026 6:00	0.00	3.71	TRUE	0.00		
17/02/2026 6:30	0.00	3.71	TRUE	0.00		
17/02/2026 7:00	0.00	3.71	TRUE	0.00		
17/02/2026 7:30	0.00	3.71	TRUE	0.00		
17/02/2026 8:00	0.00	3.71	TRUE	0.00		
17/02/2026 8:30	0.00	3.71	TRUE	0.00		
17/02/2026 9:00	0.03	3.35	TRUE	0.03		Jetty Rd
17/02/2026 9:30	0.00	3.35	TRUE	0.00		
17/02/2026 10:00	0.00	3.35	TRUE	0.00		
17/02/2026 10:30	0.00	3.35	TRUE	0.00		
17/02/2026 11:00	0.00	3.35	TRUE	0.00		
17/02/2026 11:30	0.00	3.35	TRUE	0.00		
17/02/2026 12:00	0.00	3.35	TRUE	0.00		
17/02/2026 12:30	0.02	3.35	TRUE	0.02		Oram Av

17/02/2026 13:00	0.00	3.35	TRUE	0.00		
17/02/2026 13:30	0.00	3.35	TRUE	0.00		Homebush Rd
17/02/2026 14:00	0.00	3.35	TRUE	0.00		
17/02/2026 14:30	0.00	3.35	TRUE	0.00		
17/02/2026 15:00	0.00	3.35	TRUE	0.00		
17/02/2026 15:30	0.00	3.35	TRUE	0.00		
17/02/2026 16:00	0.00	3.35	TRUE	0.00		
17/02/2026 16:30	0.10	3.35	TRUE	0.06	Normalised	Governors Bay Rd, Mitchells Rd
17/02/2026 17:00	0.00	3.35	TRUE	0.00		Mitchells Rd
17/02/2026 17:30	0.00	3.35	TRUE	0.00		
17/02/2026 18:00	0.00	3.35	TRUE	0.00		
17/02/2026 18:30	0.00	3.35	TRUE	0.00		
17/02/2026 19:00	0.00	3.35	TRUE	0.00		
17/02/2026 19:30	0.00	3.35	TRUE	0.00		
17/02/2026 20:00	0.00	3.35	TRUE	0.00		Kaituna Valley Rd
17/02/2026 20:30	0.00	3.35	TRUE	0.00		
17/02/2026 21:00	0.00	3.35	TRUE	0.00		
17/02/2026 21:30	0.00	3.35	TRUE	0.00		
17/02/2026 22:00	0.00	3.35	TRUE	0.00		
17/02/2026 22:30	0.00	3.35	TRUE	0.00		
17/02/2026 23:00	0.00	3.35	TRUE	0.00		

APPENDIX E – DIRECTORS’ CERTIFICATE FOR ANNUAL COMPLIANCE STATEMENT

Schedule 7: Form of director’s certificate for annual compliance statement

Clause 11.5(d)

We, Paul Jason Munro and Michael Earl Sang, being directors of Orion New Zealand Ltd certify that, having made all reasonable enquiry, to the best of our knowledge and belief, the attached annual compliance statement of Orion New Zealand Limited, and related information, prepared for the purposes of the *Electricity Distribution Services Default Price-Quality Path Determination 2025* has been prepared in accordance with all the relevant requirements.



Paul Jason Munro



Michael Earl Sang

25 August 2026

APPENDIX F – ASSURANCE REPORT

Independent Assurance Report

**To the directors of Orion New Zealand Limited and to the Commerce Commission
on the Annual Compliance Statement
for the assessment period ended 31 March 2026
as required by the Electricity Distribution Services Default Price-Quality Path
Determination 2025 [2024] NZCC 28 (as amended)**

The Auditor-General is the auditor of Orion New Zealand Limited (the company). The Auditor-General has appointed me, Dereck Ollsson, using the staff and resources of The Audit Office, to undertake a reasonable assurance engagement, on his behalf, on whether the Annual Compliance Statement on pages 4 to 11 for the assessment period ended on 31 March 2026 has been prepared, in all material respects, in compliance with the Electricity Distribution Services Default Price-Quality Path Determination 2025 [2024] NZCC 28 (as amended) (the Determination).

Opinion

In our opinion, in all material respects:

- 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 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 2026.

Basis for opinion

We 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* ("ISAE (NZ) 3000 (Revised)"), and the Standard on Assurance Engagements (SAE) 3100 (Revised): *Compliance Engagements* ("SAE 3100 (Revised)"), issued by the New Zealand Auditing and Assurance Standards Board.

We have obtained sufficient recorded evidence and explanations that we required to provide a basis for our opinion.

Directors' responsibilities

The directors of the company are responsible 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
- identification of risks that may threaten compliance with the clauses identified above and controls which will mitigate those risks and monitor ongoing compliance.

Auditor's responsibilities

Our responsibilities in terms of 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 2026, has been prepared, in all material respects, in accordance with the requirements in clauses 11.5 and 11.6 of the Determination.

To meet these responsibilities, we planned and performed procedures in accordance with ISAE (NZ) 3000 (Revised) and SAE 3100 (Revised), to obtain reasonable assurance about whether the company has complied, in all material respects, with clauses 11.5 and 11.6 of the Determination.

In relation to the wash-up accrual amount set out in clause 11.6 of the Determination, our procedures included recalculation of the wash-up accrual amount in accordance with schedule 1.6 of the Determination and assessing it against the amounts and disclosures contained on pages 4 to 6 of the Annual Compliance Statement.

In relation to the quality standards 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 9 of the Annual Compliance Statement.

In relation to the quality incentive adjustment set out in schedule 4 of the Determination, our procedures included recalculation of the quality incentive adjustment in accordance with schedule 4 of the Determination and assessing it against the amounts and disclosures contained on pages 9 to 10 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 to meet the requirements. The procedures selected depend on our judgement, including the identification and assessment of the risks of material non-compliance with the requirements.

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 with clauses 11.5 and 11.6 of the Determination may occur and not be detected. A reasonable assurance engagement throughout the assessment period does not provide assurance on whether compliance with clauses 11.5 and 11.6 of the Determination will continue in the future.

Restricted use

This report has been prepared for use by the directors of the company and the Commerce Commission in accordance with clause 11.5(e) of the Determination and is provided solely for the purpose of establishing whether the compliance requirements have been met. We disclaim any assumption of responsibility for any reliance on this report to any person other than the directors of the company and the Commerce Commission, or for any other purpose than that for which it was prepared.

Independence and quality control

We complied with the Auditor-General's independence and other ethical requirements, which incorporate the requirements of Professional and Ethical Standard 1: *International Code of Ethics for Assurance Practitioners (including International Independence Standards) (New Zealand)*, as applicable for audits of public interest entities (PES 1), issued by the New Zealand Auditing and Assurance Standards Board. PES 1 is founded on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We have also complied with the Auditor-General's quality management requirements, which incorporate the requirements of Professional and Ethical Standard 3: *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements (PES 3)*, issued by the New Zealand Auditing and Assurance Standards Board. PES 3 requires our firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The Auditor-General, and his employees, and The Audit Office and its employees may deal with the company on normal terms within the ordinary course of trading activities of the company. Other than any dealings on normal terms within the ordinary course of trading activities of the company, this engagement, the assurance engagement on the Information Disclosures, the assurance engagement on the Customised Price-Quality Path Proposal and the annual audit of the company's financial statements and performance information, we have no relationship with, or interests in, the company and its subsidiaries.



Dereck Ollsson
The Audit Office
On behalf of the Auditor-General
Christchurch, New Zealand
25 August 2026