

Orion New Zealand Limited

Information for disclosure for the year ended 31 March 2025

Electricity distribution information disclosure determination 2012

Approved 4 August 2025

Company Name **Orion New Zealand Limited**

For Year Ended **31 March 2025**

SCHEDULE 1: ANALYTICAL RATIOS

This schedule calculates expenditure, revenue and service ratios from the information disclosed. The disclosed ratios may vary for reasons that are company specific and, as a result, must be interpreted with care. The Commerce Commission will publish a summary and analysis of information disclosed in accordance with this ID determination. This will include information disclosed in accordance with this and other schedules, and information disclosed under the other requirements of this determination.

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

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7 1(i): Expenditure metrics

| | Expenditure per GWh energy delivered to ICPs (\$/GWh) | Expenditure per average no. of ICPs (\$/ICP) | Expenditure per MW maximum coincident system demand (\$/MW) | Expenditure per km circuit length (\$/km) | Expenditure per MVA of capacity from EDB-owned distribution transformers (\$/MVA) |
|-------------------------|---|--|---|---|---|
| Operational expenditure | 24,173 | 374 | 125,465 | 7,035 | 35,163 |
| Network | 7,950 | 123 | 41,264 | 2,314 | 11,565 |
| Non-network | 16,223 | 251 | 84,201 | 4,721 | 23,598 |
| Expenditure on assets | 36,660 | 567 | 190,272 | 10,668 | 53,326 |
| Network | 32,344 | 500 | 167,875 | 9,413 | 47,048 |
| Non-network | 4,315 | 67 | 22,398 | 1,256 | 6,277 |

17 1(ii): Revenue metrics

| | Revenue per GWh energy delivered to ICPs (\$/GWh) | Revenue per average no. of ICPs (\$/ICP) |
|---|---|--|
| Total consumer line charge revenue | 73,363 | 1,134 |
| Standard consumer line charge revenue | 75,996 | 1,116 |
| Non-standard consumer line charge revenue | 23,020 | 268,461 |

23 1(iii): Service intensity measures

| | | |
|--------------------------|--------|--|
| Demand density | 56 | Maximum coincident system demand per km of circuit length (for supply) (kW/km) |
| Volume density | 291 | Total energy delivered to ICPs per km of circuit length (for supply) (MWh/km) |
| Connection point density | 19 | Average number of ICPs per km of circuit length (for supply) (ICPs/km) |
| Energy intensity | 15,458 | Total energy delivered to ICPs per average number of ICPs (kWh/ICP) |

30 1(iv): Composition of regulatory income

| | (\$000) | % of revenue |
|--|----------------|--------------|
| Operational expenditure | 85,068 | 32.47% |
| Pass-through and recoverable costs excluding financial incentives and wash-ups | 67,701 | 25.84% |
| Total depreciation | 59,264 | 22.62% |
| Total revaluations | 39,402 | 15.04% |
| Regulatory tax allowance | 11,322 | 4.32% |
| Regulatory profit/(loss) including financial incentives and wash-ups | 76,563 | 29.22% |
| Total regulatory income | 262,003 | |

40 1(v): Reliability

| | | |
|-------------------|-------|----------------------------------|
| Interruption rate | 13.13 | Interruptions per 100 circuit km |
|-------------------|-------|----------------------------------|

Company Name **Orion New Zealand Limited**

For Year Ended **31 March 2025**

SCHEDULE 2: REPORT ON RETURN ON INVESTMENT

This schedule requires information on the Return on Investment (ROI) for the EDB relative to the Commerce Commission's estimates of post tax WACC and vanilla WACC. EDBs must calculate their ROI based on a monthly basis if required by clause 2.3.3 of this ID Determination or if they elect to. If an EDB makes this election, information supporting this calculation must be provided in 2(iii).

EDBs must provide explanatory comment on their ROI in Schedule 14 (Mandatory Explanatory Notes).

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| | CY-2 | CY-1 | Current Year CY |
|---|-----------|-------|-----------------|
| 2(i): Return on Investment | | | |
| | % | % | % |
| ROI – comparable to a post tax WACC | | | |
| Reflecting all revenue earned | 8.61% | 5.59% | 4.28% |
| Excluding revenue earned from financial incentives | 8.53% | 5.54% | 4.25% |
| Excluding revenue earned from financial incentives and wash-ups | 8.49% | 5.50% | 4.21% |
| Mid-point estimate of post tax WACC | | | |
| 25th percentile estimate | 4.88% | 6.05% | 6.18% |
| 75th percentile estimate | 4.20% | 5.37% | 5.50% |
| | 5.56% | 6.73% | 6.86% |
| ROI – comparable to a vanilla WACC | | | |
| Reflecting all revenue earned | 9.13% | 6.29% | 5.00% |
| Excluding revenue earned from financial incentives | 9.05% | 6.24% | 4.97% |
| Excluding revenue earned from financial incentives and wash-ups | 9.01% | 6.20% | 4.93% |
| WACC rate used to set regulatory price path | | | |
| | 4.23% | 4.23% | 4.23% |
| Mid-point estimate of vanilla WACC | | | |
| 25th percentile estimate | 5.39% | 6.75% | 6.90% |
| 75th percentile estimate | 4.71% | 6.07% | 6.22% |
| | 6.07% | 7.43% | 7.58% |
| 2(ii): Information Supporting the ROI | | | |
| | | | (\$000) |
| Total opening RAB value | 1,566,054 | | |
| plus Opening deferred tax | (80,253) | | |
| Opening RIV | | | 1,485,801 |
| Line charge revenue | | | 258,170 |
| Expenses cash outflow | 152,769 | | |
| add Assets commissioned | 147,572 | | |
| less Asset disposals | 506 | | |
| add Tax payments | 3,486 | | |
| less Other regulated income | 3,833 | | |
| Mid-year net cash outflows | | | 299,488 |
| Term credit spread differential allowance | | | 1,487 |
| Total closing RAB value | 1,693,258 | | |
| less Adjustment resulting from asset allocation | (0) | | |
| less Lost and found assets adjustment | - | | |
| plus Closing deferred tax | (88,089) | | |
| Closing RIV | | | 1,605,170 |
| ROI – comparable to a vanilla WACC | | | 5.00% |
| Leverage (%) | | | 42% |
| Cost of debt assumption (%) | | | 6.12% |
| Corporate tax rate (%) | | | 28% |
| ROI – comparable to a post tax WACC | | | 4.28% |

SCHEDULE 2: REPORT ON RETURN ON INVESTMENT

This schedule requires information on the Return on Investment (ROI) for the EDB relative to the Commerce Commission's estimates of post tax WACC and vanilla WACC. EDBs must calculate their ROI based on a monthly basis if required by clause 2.3.3 of this ID Determination or if they elect to. If an EDB makes this election, information supporting this calculation must be provided in 2(iii).

EDBs must provide explanatory comment on their ROI in Schedule 14 (Mandatory Explanatory Notes).

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2(iii): Information Supporting the Monthly ROI

Opening RIV

N/A

| | Line charge revenue | Expenses cash outflow | Assets commissioned | Asset disposals | Other regulated income | Monthly net cash outflows |
|--------------|---------------------|-----------------------|---------------------|-----------------|------------------------|---------------------------|
| April | | | | | | - |
| May | | | | | | - |
| June | | | | | | - |
| July | | | | | | - |
| August | | | | | | - |
| September | | | | | | - |
| October | | | | | | - |
| November | | | | | | - |
| December | | | | | | - |
| January | | | | | | - |
| February | | | | | | - |
| March | | | | | | - |
| Total | - | - | - | - | - | - |

Tax payments

N/A

Term credit spread differential allowance

N/A

Closing RIV

N/A

Monthly ROI – comparable to a vanilla WACC

N/A

Monthly ROI – comparable to a post tax WACC

N/A

2(iv): Year-End ROI Rates for Comparison Purposes

Year-end ROI – comparable to a vanilla WACC

4.81%

Year-end ROI – comparable to a post tax WACC

4.09%

* these year-end ROI values are comparable to the ROI reported in pre 2012 disclosures by EDBs and do not represent the Commission's current view on ROI.

2(v): Financial Incentives and Wash-Ups

| | |
|---|-----------------------------|
| IRIS incentive adjustment | |
| Purchased assets – avoided transmission charge | |
| Innovation and non-traditional solutions recovered amount | |
| Quality incentive adjustment | 678 |
| Other CPP financial incentives | |
| Financial incentives | 678 |
| Impact of financial incentives on ROI | 0.03% |
| Input methodology claw-back | |
| CPP application recoverable costs | |
| CPP Urgent project allowance | Not Required before DY |
| Reopener event allowance | Not Required before DY |
| Wash-up draw down amount | Not Required before DY |
| Catastrophic event allowance | Not Required after DY20 |
| Capex wash-up adjustment | 799 Not Required after DY20 |

SCHEDULE 3: REPORT ON REGULATORY PROFIT

This schedule requires information on the calculation of regulatory profit for the EDB for the disclosure year. All EDBs must complete all sections and provide explanatory comment on their regulatory profit in Schedule 14 (Mandatory Explanatory Notes).

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

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| 3(i): Regulatory Profit | | (\$000) |
|--------------------------------|---|------------------------|
| 7 | Income | |
| 8 | Line charge revenue | 258,170 |
| 9 | plus Gains / (losses) on asset disposals | (473) |
| 10 | plus Other regulated income (other than gains / (losses) on asset disposals) | 4,306 |
| 11 | | |
| 12 | | |
| 13 | Total regulatory income | 262,003 |
| 14 | Expenses | |
| 15 | less Operational expenditure | 85,068 |
| 16 | | |
| 17 | less Pass-through and recoverable costs excluding financial incentives and wash-ups | 67,701 |
| 18 | | |
| 19 | Operating surplus / (deficit) | 109,234 |
| 20 | | |
| 21 | less Total depreciation | 59,264 |
| 22 | | |
| 23 | plus Total revaluations | 39,402 |
| 24 | | |
| 25 | Regulatory profit / (loss) before tax | 89,372 |
| 26 | | |
| 27 | less Term credit spread differential allowance | 1,487 |
| 28 | | |
| 29 | less Regulatory tax allowance | 11,322 |
| 30 | | |
| 31 | Regulatory profit/(loss) including financial incentives and wash-ups | 76,563 |
| 32 | | |
| 33 | 3(ii): Pass-through and Recoverable Costs excluding Financial Incentives and Wash-Ups | (\$000) |
| 34 | Pass through costs | |
| 35 | Electricity lines service charge payable to Transpower | Not Required before D |
| 36 | Transpower new investment contract charges | Not Required before D |
| 37 | System operator services | Not Required before D |
| 38 | Rates | 5,574 |
| 39 | Commerce Act levies | 903 |
| 40 | Industry levies | 1,099 |
| 41 | CPP or DPP specified pass-through costs | |
| 42 | Recoverable costs excluding financial incentives and wash-ups | |
| 43 | Independent engineer costs | Not Required before D |
| 44 | FENZ levies | 140 |
| 45 | Electricity lines service charge payable to Transpower | 56,707 |
| 46 | Transpower new investment contract charges | 3,277 |
| 47 | System operator services | Not Required after DY2 |
| 48 | Distributed generation allowance | Not Required after DY2 |
| 49 | Extended reserves allowance | |
| 50 | Other CPP recoverable costs excluding financial incentives and wash-ups | |
| 51 | Pass-through and recoverable costs excluding financial incentives and wash-ups | 67,701 |
| 52 | | |
| 53 | 3(iv): Merger and Acquisition Expenditure | |
| 54 | | (\$000) |
| 55 | Merger and acquisition expenditure | |
| 56 | | |
| 57 | <i>Provide commentary on the benefits of merger and acquisition expenditure to the electricity distribution business, including required disclosures in accordance with section 2.7, in Schedule 14 (Mandatory Explanatory Notes)</i> | |
| 58 | 3(v): Other Disclosures | |
| 59 | | (\$000) |
| 60 | Self-insurance allowance | |

SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD)

This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2. EDIs must provide explanatory comment on the value of their RAB in Schedule 34 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

| | RAB CY-4 (\$000) | RAB CY-3 (\$000) | RAB CY-2 (\$000) | RAB CY-1 (\$000) | RAB CY (\$000) |
|---|------------------------|------------------------|------------------------|------------------------|----------------------|
| 4(i): Regulatory Asset Base Value (Rolled Forward) | | | | | |
| Total opening RAB value | 1,150,406 | 1,177,019 | 1,307,972 | 1,450,079 | 1,566,054 |
| less Total depreciation | 43,959 | 45,534 | 50,427 | 55,548 | 59,264 |
| plus Total revaluations | 17,485 | 81,111 | 86,682 | 58,173 | 39,402 |
| plus Assets commissioned | 53,187 | 97,004 | 106,230 | 114,133 | 147,572 |
| less Asset disposals | 495 | 1,726 | 308 | 793 | 506 |
| plus Lost and found assets adjustment | - | - | - | - | - |
| plus Adjustment resulting from asset allocation | - | - | - | - | (0) |
| Total closing RAB value | 1,177,019 | 1,307,972 | 1,450,079 | 1,566,054 | 1,693,258 |

4(ii): Unallocated Regulatory Asset Base

| | Unallocated RAB * (\$000) | RAB (\$000) |
|---|------------------------------|------------------|
| Total opening RAB value | 1,567,410 | 1,566,054 |
| less Total depreciation | 59,239 | 59,264 |
| plus Total revaluations | 39,437 | 39,402 |
| plus Assets commissioned (other than below) | 67,935 | 67,935 |
| less Assets commissioned out of WUC | - | - |
| plus Assets acquired (other than below) | - | - |
| less Assets acquired from a regulated supplier | - | - |
| plus Assets acquired from a related party | 79,637 | 79,637 |
| less Assets commissioned | - | - |
| less Asset disposals (other than below) | 506 | 506 |
| plus Asset disposals to a regulated supplier | - | - |
| less Asset disposals to a related party | - | - |
| plus Asset disposals | 506 | 506 |
| plus Lost and found assets adjustment | - | - |
| plus Adjustment resulting from asset allocation | - | (0) |
| Total closing RAB value | 1,694,674 | 1,693,258 |

* The 'unallocated RAB' is the total value of those assets used wholly or partially to provide electricity distribution services without any allowance being made for the allocation of costs to services provided by the supplier that are not electricity distribution services. The RAB value represents the value of these assets after applying this cost allocation. Neither value includes works under construction.

SCHEDULE 4: REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD)

This schedule requires information on the calculation of the Regulatory Asset Base (RAB) value to the end of this disclosure year. This informs the ROI calculation in Schedule 2. EDIs must provide explanatory comment on the value of their RAB in Schedule 14 (Mandatory Explanatory Notes). This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

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4(iii): Calculation of Revaluation Rate and Revaluation of Assets

| | | | | | |
|----|--|--|--|--|-------|
| 53 | | | | | |
| 54 | | | | | |
| 55 | | | | | |
| 56 | | | | | 1,295 |
| 57 | | | | | 1,267 |
| 58 | | | | | 2.53% |
| 59 | | | | | |
| 60 | | | | | |
| 61 | | | | | |
| 62 | | | | | |
| 63 | | | | | |
| 64 | | | | | |
| 65 | | | | | |
| 66 | | | | | |
| 67 | | | | | |

4(iv): Roll Forward of Works Under Construction

| | | | | | |
|----|--|--|--|--|--|
| 69 | | | | | |
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| 89 | | | | | |

SCHEDULE 5a: REPORT ON REGULATORY TAX ALLOWANCE

This schedule requires information on the calculation of the regulatory tax allowance. This information is used to calculate regulatory profit/loss in Schedule 3 (regulatory profit). EDBs must provide explanatory commentary on the information disclosed in this schedule, in Schedule 14 (Mandatory Explanatory Notes).

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 30

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| 5a(i): Regulatory Tax Allowance | | (\$000) |
|--|---|---------------|
| | Regulatory profit / (loss) before tax | 89,372 |
| plus | Income not included in regulatory profit / (loss) before tax but taxable | - |
| | Expenditure or loss in regulatory profit / (loss) before tax but not deductible | 36 |
| | Amortisation of initial differences in asset values | 15,157 |
| | Amortisation of revaluations | 13,854 |
| | Total | 29,048 |
| less | Total revaluations | 39,402 |
| | Income included in regulatory profit / (loss) before tax but not taxable | - |
| | Discretionary discounts and customer rebates | - |
| | Expenditure or loss deductible but not in regulatory profit / (loss) before tax | 65 |
| | Notional deductible interest | 38,517 |
| | Total | 77,984 |
| | Regulatory taxable income | 40,436 |
| less | Utilised tax losses | - |
| | Regulatory net taxable income | 40,436 |
| | Corporate tax rate (%) | 28% |
| | Regulatory tax allowance | 11,322 |

* Workings to be provided in Schedule 14

5a(ii): Disclosure of Permanent Differences

In Schedule 14, Box 5, provide descriptions and workings of items recorded in the asterisked categories in Schedule 5a(i).

5a(iii): Amortisation of Initial Difference in Asset Values

(\$000)

| | | |
|------|---|---------|
| | Opening unamortised initial differences in asset values | 280,105 |
| less | Amortisation of initial differences in asset values | 15,157 |
| plus | Adjustment for unamortised initial differences in assets acquired | - |
| less | Adjustment for unamortised initial differences in assets disposed | 268 |
| | Closing unamortised initial differences in asset values | 264,680 |
| | Opening weighted average remaining useful life of relevant assets (years) | 18 |

SCHEDULE 5a: REPORT ON REGULATORY TAX ALLOWANCE

This schedule requires information on the calculation of the regulatory tax allowance. This information is used to calculate regulatory profit/loss in Schedule 3 (regulatory profit). EDBs must provide explanatory commentary on the information disclosed in this schedule, in Schedule 14 (Mandatory Explanatory Notes).

This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 100.

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| | | | |
|----|--|-----------|----------|
| 44 | 5a(iv): Amortisation of Revaluations | | (\$000) |
| 45 | | | |
| 46 | Opening sum of RAB values without revaluations | 1,232,921 | |
| 47 | | | |
| 48 | Adjusted depreciation | 45,410 | |
| 49 | Total depreciation | 59,264 | |
| 50 | Amortisation of revaluations | | 13,854 |
| 51 | | | |
| 52 | 5a(v): Reconciliation of Tax Losses | | (\$000) |
| 53 | | | |
| 54 | Opening tax losses | | |
| 55 | plus Current period tax losses | | |
| 56 | less Utilised tax losses | | |
| 57 | Closing tax losses | | - |
| 58 | 5a(vi): Calculation of Deferred Tax Balance | | (\$000) |
| 59 | | | |
| 60 | Opening deferred tax | (80,253) | |
| 61 | | | |
| 62 | plus Tax effect of adjusted depreciation | 12,715 | |
| 63 | | | |
| 64 | less Tax effect of tax depreciation | 16,541 | |
| 65 | | | |
| 66 | plus Tax effect of other temporary differences* | 223 | |
| 67 | | | |
| 68 | less Tax effect of amortisation of initial differences in asset values | 4,244 | |
| 69 | | | |
| 70 | plus Deferred tax balance relating to assets acquired in the disclosure year | | |
| 71 | | | |
| 72 | less Deferred tax balance relating to assets disposed in the disclosure year | (11) | |
| 73 | | | |
| 74 | plus Deferred tax cost allocation adjustment | 0 | |
| 75 | | | |
| 76 | Closing deferred tax | | (88,089) |
| 77 | | | |
| 78 | 5a(vii): Disclosure of Temporary Differences | | |
| 79 | <i>In Schedule 14, Box 6, provide descriptions and workings of items recorded in the asterisked category in Schedule 5a(vi) (Tax effect of other temporary differences).</i> | | |
| 80 | | | |
| 81 | 5a(viii): Regulatory Tax Asset Base Roll-Forward | | |
| 82 | | | (\$000) |
| 83 | Opening sum of regulatory tax asset values | 611,769 | |
| 84 | less Tax depreciation | 59,074 | |
| 85 | plus Regulatory tax asset value of assets commissioned | 145,727 | |
| 86 | less Regulatory tax asset value of asset disposals | 93 | |
| 87 | plus Lost and found assets adjustment | - | |
| 88 | plus Adjustment resulting from asset allocation | - | |
| 89 | plus Other adjustments to the RAB tax value | 421 | |
| 90 | Closing sum of regulatory tax asset values | | 698,750 |

Company Name **Orion New Zealand Limited**

For Year Ended

SCHEDULE 5b: REPORT ON RELATED PARTY TRANSACTIONS

This schedule provides information on the valuation of related party transactions, in accordance with clause 2.3.6 of this ID determination. This information is part of audited disclosure information (as defined in clause 1.4 of this ID determination), and so is subject to the assurance report required by clause 2.8.

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5b(i): Summary—Related Party Transactions

| | (\$000) | (\$000) |
|--|---------|---------|
| Total regulatory income | | 3,993 |
| Market value of asset disposals | | – |
| Service interruptions and emergencies | 11,968 | |
| Vegetation management | – | |
| Routine and corrective maintenance and inspection | 10,130 | |
| Asset replacement and renewal (opex) | – | |
| Network opex | | 22,097 |
| Business support | 4,546 | |
| System operations and network support | 167 | |
| Non-network solutions provided by a related party or third party | – | |
| Operational expenditure | | 26,811 |
| Consumer connection | 8,553 | |
| System growth | 12,299 | |
| Asset replacement and renewal (capex) | 24,775 | |
| Asset relocations | 3,925 | |
| Quality of supply | 211 | |
| Legislative and regulatory | – | |
| Other reliability, safety and environment | 7,581 | |
| Expenditure on non-network assets | | 258 |
| Expenditure on assets | | 57,602 |
| Cost of financing | | |
| Value of capital contributions | | 932 |
| Value of vested assets | | |
| Capital Expenditure | | 56,670 |
| Total expenditure | | 83,481 |
| Other related party transactions | | 5,899 |

5b(iii): Total Opex and Capex Related Party Transactions

| Name of related party | Nature of opex or capex service provided | Total value of transactions (\$000) |
|--|---|-------------------------------------|
| Connetics | Consumer connection | 8,553 |
| Connetics | Asset relocations | 3,925 |
| Connetics | Other reliability, safety and environment | 7,581 |
| Connetics | Quality of supply | 206 |
| Connetics | System growth | 12,233 |
| Connetics | Asset replacement and renewal (capex) | 24,770 |
| Connetics | Service interruptions and emergencies | 11,968 |
| Connetics | Routine and corrective maintenance and inspection | 10,090 |
| Connetics | Business support | 200 |
| Connetics | Expenditure on non-network assets | 258 |
| Connetics | System operations and network support | 167 |
| Christchurch City Council | System growth | 16 |
| Christchurch City Council | Asset replacement and renewal (capex) | 5 |
| Christchurch City Council | Routine and corrective maintenance and inspection | 33 |
| Christchurch City Council | Business support | 37 |
| Corde | Quality of supply | 5 |
| Christchurch City Holdings Limited | Business support | 14 |
| Selwyn District Council | Business support | 30 |
| Selwyn District Council | System growth | 50 |
| Selwyn District Council | Routine and corrective maintenance and inspection | 6 |
| Orion Directors - Fees | Business support | 421 |
| Orion Senior Leadership - salaries | Business support | 3,756 |
| Orion Senior Leadership - post employment benefits | Business support | 88 |
| Total value of related party transactions | | 84,413 |

SCHEDULE 5c: REPORT ON TERM CREDIT SPREAD DIFFERENTIAL ALLOWANCE

This schedule is only to be completed if, as at the date of the most recently published financial statements, the weighted average original tenor of the debt portfolio (both qualifying debt and non-qualifying debt) is greater than five years. This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

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5c(i): Qualifying Debt (may be Commission only)

| Issuing party | Issue date | Pricing date | Original tenor (in years) | Coupon rate (%) | Book value at issue date (NZD) | Book value at date of financial statements (NZD) | Term Credit Spread Difference | Debt issue cost readjustment |
|--|------------|--------------|---------------------------|-----------------|--------------------------------|--|-------------------------------|------------------------------|
| US Private Placement (USPP) 2018 Series A - NZD \$45m | 12/09/2018 | 27/07/2018 | 10 | BKBM + margin | 45,000,000 | 45,000,000 | 168,750 | -45,000 |
| US Private Placement (USPP) 2018 Series B - NZD \$95m | 12/09/2018 | 27/07/2018 | 12 | BKBM + margin | 95,000,000 | 95,000,000 | 498,750 | -110,833 |
| Christchurch City Holdings Limited - NZD \$50m | 20/10/2022 | 30/06/2032 | 10 | BKBM + margin | 50,000,000 | 50,000,000 | 187,500 | -50,000 |
| Christchurch City Holdings Limited - NZD \$50m | 20/03/2023 | 30/06/2031 | 8 | BKBM + margin | 50,000,000 | 50,000,000 | 112,500 | -37,500 |
| US Private Placement (USPP) 2023 Series C - NZD \$100m | 22/11/2023 | 25/10/2023 | 10 | BKBM + margin | 100,000,000 | 100,000,000 | 375,000 | -100,000 |
| US Private Placement (USPP) 2023 Series D - NZD \$100m | 22/11/2023 | 25/10/2023 | 12 | BKBM + margin | 100,000,000 | 100,000,000 | 525,000 | -116,667 |
| <i>* include additional rows if needed</i> | | | | | | | | |
| | | | | | 440,000,000 | 440,000,000 | 1,867,500 | (460,000) |

5c(ii): Attribution of Term Credit Spread Differential

Gross term credit spread differential

| | |
|--|-------------|
| Total book value of interest bearing debt | 647,900,000 |
| Leverage | 42% |
| Average opening and closing RAB values | 1,629,656 |
| Attribution Rate (%) | 0% |
| Term credit spread differential allowance | 1,487 |

SCHEDULE 5d: REPORT ON COST ALLOCATIONS

This schedule provides information on the allocation of operational costs. EDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any reclassifications. This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch.ref

| | Arm's length deduction | Electricity distribution services | Non-electricity distribution services | Total | OV/ABAA allocation increase (\$000s) |
|---|------------------------|-----------------------------------|---------------------------------------|-------|--------------------------------------|
| 5d(i): Operating Cost Allocations | | | | | |
| Service interruptions and emergencies | | | | | |
| 10 Directly attributable | | 12,125 | | | |
| 11 Not directly attributable | | | | | |
| 12 Total attributable to regulated service | | 12,125 | | | |
| Vegetation management | | | | | |
| 14 Directly attributable | | 4,456 | | | |
| 15 Not directly attributable | | | | | |
| 16 Total attributable to regulated service | | 4,456 | | | |
| Routine and corrective maintenance and inspection | | | | | |
| 18 Directly attributable | | 10,836 | | | |
| 19 Not directly attributable | | | | | |
| 20 Total attributable to regulated service | | 10,836 | | | |
| Asset replacement and renewal | | | | | |
| 22 Directly attributable | | 561 | | | |
| 23 Not directly attributable | | | | | |
| 24 Total attributable to regulated service | | 561 | | | |
| Non-network solutions provided by a related party or third party | | | | | |
| 26 Directly attributable | | | | | |
| 27 Not directly attributable | | | | | |
| 28 Total attributable to regulated service | | | | | |
| System operations and network support | | | | | |
| 30 Directly attributable | | 21,345 | | | |
| 31 Not directly attributable | | | | | |
| 32 Total attributable to regulated service | | 21,345 | | | |
| Business support | | | | | |
| 34 Directly attributable | | 35,745 | | | |
| 35 Not directly attributable | | 38 | 13 | 51 | |
| 36 Total attributable to regulated service | | 35,783 | | | |
| 37 Operating costs directly attributable | | 85,068 | | | |
| 38 Operating costs not directly attributable | | 38 | 13 | 51 | |
| 39 Total attributable to regulated service | | 85,106 | | | |
| 40 Operational expenditure | | | | | |
| 41 | | | | | |
| 42 | | | | | |

SCHEDULE 5e: REPORT ON ASSET ALLOCATIONS

This schedule requires information on the allocation of asset values. This information supports the calculation of the RAB value in Schedule 4. EDBs must provide explanatory comment on their cost allocation in Schedule 14 (Mandatory Explanatory Notes), including on the impact of any changes in asset allocations. This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

| 5e(i): Regulated Service Asset Values | | Value allocated (\$000s) Electricity distribution services |
|---------------------------------------|--|---|
| 7 | | |
| 8 | | |
| 9 | | |
| 10 | Subtransmission lines | |
| 11 | Directly attributable | 100,267 |
| 12 | Not directly attributable | |
| 13 | Total attributable to regulated service | 100,267 |
| 14 | Subtransmission cables | |
| 15 | Directly attributable | 146,524 |
| 16 | Not directly attributable | |
| 17 | Total attributable to regulated service | 146,524 |
| 18 | Zone substations | |
| 19 | Directly attributable | 206,523 |
| 20 | Not directly attributable | |
| 21 | Total attributable to regulated service | 206,523 |
| 22 | Distribution and LV lines | |
| 23 | Directly attributable | 185,261 |
| 24 | Not directly attributable | |
| 25 | Total attributable to regulated service | 185,261 |
| 26 | Distribution and LV cables | |
| 27 | Directly attributable | 516,815 |
| 28 | Not directly attributable | |
| 29 | Total attributable to regulated service | 516,815 |
| 30 | Distribution substations and transformers | |
| 31 | Directly attributable | 189,521 |
| 32 | Not directly attributable | |
| 33 | Total attributable to regulated service | 189,521 |
| 34 | Distribution switchgear | |
| 35 | Directly attributable | 229,748 |
| 36 | Not directly attributable | |
| 37 | Total attributable to regulated service | 229,748 |
| 38 | Other network assets | |
| 39 | Directly attributable | 51,480 |
| 40 | Not directly attributable | |
| 41 | Total attributable to regulated service | 51,480 |
| 42 | Non-network assets | |
| 43 | Directly attributable | 56,140 |
| 44 | Not directly attributable | 10,979 |
| 45 | Total attributable to regulated service | 67,119 |
| 46 | | |
| 47 | Regulated service asset value directly attributable | 1,682,279 |
| 48 | Regulated service asset value not directly attributable | 10,979 |
| 49 | Total closing RAB value | 1,693,258 |
| 50 | | |

| 5e(ii): Changes in Asset Allocations* † | | (\$000) | |
|---|---|---------|-------------------|
| | | CY-1 | Current Year (CY) |
| 51 | | | |
| 52 | | | |
| 53 | Change in asset value allocation 1 | | |
| 54 | Asset category | | |
| 55 | Original allocator or line items | | |
| 56 | New allocator or line items | | |
| 57 | | | |
| 58 | Rationale for change | | |
| 59 | | | |
| 60 | | | |
| 61 | | | |
| 62 | Change in asset value allocation 2 | | |
| 63 | Asset category | | |
| 64 | Original allocator or line items | | |
| 65 | New allocator or line items | | |
| 66 | | | |
| 67 | Rationale for change | | |
| 68 | | | |
| 69 | | | |
| 70 | | | |
| 71 | Change in asset value allocation 3 | | |
| 72 | Asset category | | |
| 73 | Original allocator or line items | | |
| 74 | New allocator or line items | | |
| 75 | | | |
| 76 | Rationale for change | | |
| 77 | | | |
| 78 | | | |

* a change in asset allocation must be completed for each allocator or component change that has occurred in the disclosure year. A movement in an allocator metric is not a change in allocator or comp
† include additional rows if needed

SCHEDULE 6a: REPORT ON CAPITAL EXPENDITURE FOR THE DISCLOSURE YEAR

This schedule requires a breakdown of capital expenditure on assets incurred in the disclosure year, including any assets in respect of which capital contributions are received, but excluding assets that are vested assets. Information on expenditure on assets must be provided on an accounting accruals basis and must exclude finance costs. EDBs must provide explanatory comment on their expenditure on assets in Schedule 14 (Explanatory Notes to Templates). This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

| | (\$000) | (\$000) |
|---|---------|-----------------|
| 7 6a(i): Expenditure on Assets | | |
| 8 Consumer connection | | 38,633 |
| 9 System growth | | 26,566 |
| 10 Asset replacement and renewal | | 35,255 |
| 11 Asset relocations | | 4,125 |
| 12 Reliability, safety and environment: | | |
| 13 Quality of supply | 500 | |
| 14 Legislative and regulatory | - | |
| 15 Other reliability, safety and environment | 8,743 | |
| 16 Total reliability, safety and environment | | 9,243 |
| 17 Expenditure on network assets | | 113,822 |
| 18 Expenditure on non-network assets | | 15,186 |
| 19 | | |
| 20 Expenditure on assets | | 129,008 |
| 21 plus Cost of financing | | 771 |
| 22 less Value of capital contributions | | 9,779 |
| 23 plus Value of vested assets | | |
| 24 | | |
| 25 Capital expenditure | | 120,000 |
| 26 6a(ii): Subcomponents of Expenditure on Assets (where known) | | (\$000) |
| 27 Energy efficiency and demand side management, reduction of energy losses | | |
| 28 Overhead to underground conversion | | |
| 29 Research and development | | |
| 31 6a(iii): Consumer Connection | | |
| 32 <i>Consumer types defined by EDB*</i> | (\$000) | (\$000) |
| 33 Large customers | 2,336 | |
| 34 General connections | 21,793 | |
| 35 Subdivisions | 6,151 | |
| 36 Transformers | 4,725 | |
| 37 Switchgear | 3,628 | |
| 38 <i>* include additional rows if needed</i> | | |
| 39 Consumer connection expenditure | | 38,633 |
| 41 less Capital contributions funding consumer connection expenditure | 6,516 | |
| 42 Consumer connection less capital contributions | | 32,117 |
| 43 6a(iv): System Growth and Asset Replacement and Renewal | | |
| 44 | | Asset |
| 45 | | Replacement and |
| 46 | | Renewal |
| 47 | | |
| 48 | | |
| 49 | | |
| 50 | | |
| 51 | | |
| 52 | | |
| 53 | | |
| 54 | | |
| 55 | | |
| 56 | | |
| 57 6a(v): Asset Relocations | | |
| 58 <i>Project or programme*</i> | (\$000) | (\$000) |
| 59 NZTA and others | 1039 | |
| 60 Selwyn District Council | 1,572 | |
| 61 Christchurch City Council | 1,306 | |
| 62 Others | 208 | |
| 63 | 0 | |
| 64 <i>* include additional rows if needed</i> | | |
| 65 All other projects or programmes - asset relocations | | |
| 66 Asset relocations expenditure | | 4,125 |
| 67 less Capital contributions funding asset relocations | 3,263 | |
| 68 Asset relocations less capital contributions | | 862 |

SCHEDULE 6a: REPORT ON CAPITAL EXPENDITURE FOR THE DISCLOSURE YEAR

This schedule requires a breakdown of capital expenditure on assets incurred in the disclosure year, including any assets in respect of which capital contributions are received, but excluding assets that are vested assets. Information on expenditure on assets must be provided on an accounting accruals basis and must exclude finance costs. EDBs must provide explanatory comment on their expenditure on assets in Schedule 14 (Explanatory Notes to Templates). This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

| | | | | |
|-----|--|--|---------|---------|
| 69 | | | | |
| 70 | 6a(vi): Quality of Supply | | | |
| 71 | Project or programme* | | (\$000) | (\$000) |
| 72 | Comms associated with Entec line switches | | 289 | |
| 73 | Other | | 211 | |
| 74 | | | | |
| 75 | | | | |
| 76 | | | | |
| 77 | * include additional rows if needed | | | |
| 78 | All other projects programmes - quality of supply | | | |
| 79 | Quality of supply expenditure | | | 500 |
| 80 | less Capital contributions funding quality of supply | | | |
| 81 | Quality of supply less capital contributions | | | 500 |
| 82 | 6a(vii): Legislative and Regulatory | | | |
| 83 | Project or programme* | | (\$000) | (\$000) |
| 84 | | | | |
| 85 | | | | |
| 86 | | | | |
| 87 | | | | |
| 88 | | | | |
| 89 | * include additional rows if needed | | | |
| 90 | All other projects or programmes - legislative and regulatory | | | |
| 91 | Legislative and regulatory expenditure | | | - |
| 92 | less Capital contributions funding legislative and regulatory | | | |
| 93 | Legislative and regulatory less capital contributions | | | - |
| 94 | 6a(viii): Other Reliability, Safety and Environment | | | |
| 95 | Project or programme* | | (\$000) | (\$000) |
| 96 | 400V UG Supply Fuse Relocation Program | | 8,328 | |
| 97 | LV ties replacement with Krone | | 16 | |
| 98 | Other | | 399 | |
| 99 | | | | |
| 100 | | | | |
| 101 | * include additional rows if needed | | | |
| 102 | All other projects or programmes - other reliability, safety and environment | | | |
| 103 | Other reliability, safety and environment expenditure | | | 8,743 |
| 104 | less Capital contributions funding other reliability, safety and environment | | | |
| 105 | Other reliability, safety and environment less capital contributions | | | 8,743 |
| 106 | | | | |
| 107 | 6a(ix): Non-Network Assets | | | |
| 108 | Routine expenditure | | | |
| 109 | Project or programme* | | (\$000) | (\$000) |
| 110 | Vehicles and mobile equipment | | 1,037 | |
| 111 | Information solutions | | 11,969 | |
| 112 | Sundry tools and equipment | | 1,937 | |
| 113 | Sundry land and buildings | | 243 | |
| 114 | | | | |
| 115 | * include additional rows if needed | | | |
| 116 | All other projects or programmes - routine expenditure | | | |
| 117 | Routine expenditure | | | 15,186 |
| 118 | Atypical expenditure | | | |
| 119 | Project or programme* | | (\$000) | (\$000) |
| 120 | [Description of material project or programme] | | | |
| 121 | [Description of material project or programme] | | | |
| 122 | [Description of material project or programme] | | | |
| 123 | [Description of material project or programme] | | | |
| 124 | [Description of material project or programme] | | | |
| 125 | * include additional rows if needed | | | |
| 126 | All other projects or programmes - atypical expenditure | | | |
| 127 | Atypical expenditure | | | - |
| 128 | | | | |
| 129 | Expenditure on non-network assets | | | 15,186 |

SCHEDULE 6b: REPORT ON OPERATIONAL EXPENDITURE FOR THE DISCLOSURE YEAR

This schedule requires a breakdown of operational expenditure incurred in the disclosure year.
EDBs must provide explanatory comment on their operational expenditure in Schedule 14 (Explanatory notes to templates). This includes explanatory comment on any atypical operational expenditure and assets replaced or renewed as part of asset replacement and renewal operational expenditure, and additional information on insurance.
This information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

| | | (\$000) | (\$000) | |
|----|--|---------|---------------------------------|--|
| 7 | 6b(i): Operational Expenditure <i>Required for DY2025 only</i> | | | |
| 8 | Service interruptions and emergencies | 12,125 | | |
| 9 | Vegetation management | 4,456 | | |
| 10 | Routine and corrective maintenance and inspection | 10,836 | | |
| 11 | Asset replacement and renewal | 561 | | |
| 12 | Network opex | | 27,978 | |
| 13 | Non-network solutions provided by a related party or third party | - | <i>Required for DY2025 only</i> | |
| 14 | System operations and network support | 21,345 | | |
| 15 | Business support | 35,745 | | |
| 16 | Non-network opex | | 57,090 | |
| 17 | | | | |
| 18 | Operational expenditure | | 85,068 | |
| 19 | 6b(i): Operational Expenditure <i>Not Required before DY2026</i> | (\$000) | (\$000) | |
| 20 | Service interruptions and emergencies: | | | |
| 21 | Vegetation-related | | | |
| 22 | Other | | | |
| 23 | Total service interruptions and emergencies | - | | |
| 24 | Vegetation management: | | | |
| 25 | Assessment and notification costs | | | |
| 26 | Felling or trimming vegetation - in-zone | | | |
| 27 | Felling or trimming vegetation - out-of-zone | | | |
| 28 | Other | | | |
| 29 | Total vegetation management | - | | |
| 30 | | | | |
| 31 | Routine and corrective maintenance and inspection: | | | |
| 32 | Asset replacement and renewal | | | |
| 33 | Network opex | | - | |
| 34 | Non-network solutions provided by a related party or third party | | | |
| 35 | System operations and network support | | | |
| 36 | Business support | | | |
| 37 | Non-network opex | | - | |
| 38 | | | | |
| 39 | Operational expenditure | | - | |
| 40 | 6b(ii): Subcomponents of Operational Expenditure (where known) | | | |
| 41 | Energy efficiency and demand side management, reduction of energy losses | | | |
| 42 | Direct billing* | | | |
| 43 | Research and development | | | |
| 44 | Insurance | | 3,371 | |
| 45 | * Direct billing expenditure by suppliers that directly bill the majority of their consumers | | | |

Company Name

Orion New Zealand Limited

For Year Ended

31 March 2025

SCHEDULE 7: COMPARISON OF FORECASTS TO ACTUAL EXPENDITURE

This schedule compares actual revenue and expenditure to the previous forecasts that were made for the disclosure year. Accordingly, this schedule requires the forecast revenue and expenditure information from previous disclosures to be inserted.

EDBs must provide explanatory comment on the variance between actual and target revenue and forecast expenditure in Schedule 14 (Mandatory Explanatory Notes).

This information is part of the audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8. For the purpose of this audit, target revenue and forecast expenditures only need to be verified back to previous disclosures.

sch ref

| 7(i): Revenue | | Target (\$000) ¹ | Actual (\$000) | % variance |
|---|--|--------------------------------------|-----------------------|-------------------|
| 7 | | | | |
| 8 | Line charge revenue | 257,779 | 258,170 | 0% |
| 7(ii): Expenditure on Assets | | Forecast (\$000) ² | Actual (\$000) | % variance |
| 9 | | | | |
| 10 | Consumer connection | 30,228 | 38,633 | 28% |
| 11 | System growth | 31,756 | 26,566 | (16%) |
| 12 | Asset replacement and renewal | 38,889 | 35,255 | (9%) |
| 13 | Asset relocations | 12,581 | 4,125 | (67%) |
| 14 | Reliability, safety and environment: | | | |
| 15 | Quality of supply | 5,680 | 500 | (91%) |
| 16 | Legislative and regulatory | – | – | – |
| 17 | Other reliability, safety and environment | 11,206 | 8,743 | (22%) |
| 18 | Total reliability, safety and environment | 16,886 | 9,243 | (45%) |
| 19 | Expenditure on network assets | 130,340 | 113,822 | (13%) |
| 20 | Expenditure on non-network assets | 22,283 | 15,186 | (32%) |
| 21 | Expenditure on assets | 152,623 | 129,008 | (15%) |
| 7(iii): Operational Expenditure | | | | |
| 22 | | | | |
| 23 | Service interruptions and emergencies | 9,856 | 12,125 | 23% |
| 24 | Vegetation management | 4,933 | 4,456 | (10%) |
| 25 | Routine and corrective maintenance and inspection | 16,032 | 10,836 | (32%) |
| 26 | Asset replacement and renewal | 3,085 | 561 | (82%) |
| 27 | Network opex | 33,906 | 27,978 | (17%) |
| 28 | Non-network solutions provided by a related party or third party | – | – | – |
| 29 | System operations and network support | 21,534 | 21,345 | (1%) |
| 30 | Business support | 31,038 | 35,745 | 15% |
| 31 | Non-network opex | 52,572 | 57,090 | 9% |
| 32 | Operational expenditure | 86,478 | 85,068 | (2%) |
| 7(iv): Subcomponents of Expenditure on Assets (where known) | | | | |
| 33 | | | | |
| 34 | Energy efficiency and demand side management, reduction of energy losses | 988 | – | (100%) |
| 35 | Overhead to underground conversion | – | – | – |
| 36 | Research and development | 11,573 | – | (100%) |
| 37 | | | | |
| 7(v): Subcomponents of Operational Expenditure (where known) | | | | |
| 38 | | | | |
| 39 | Energy efficiency and demand side management, reduction of energy losses | 504 | – | (100%) |
| 40 | Direct billing | – | – | – |
| 41 | Research and development | 1,427 | – | (100%) |
| 42 | Insurance | 3,373 | 3,371 | (0%) |
| 43 | | | | |

¹ From the nominal dollar target revenue for the disclosure year disclosed under clause 2.4.3(3) of this determination

² From the CY+1 nominal dollar expenditure forecasts disclosed in accordance with clause 2.6.6 for the forecast period starting at the beginning of the disclosure year (the second to last disclosure of Schedules 11a and 11b)

SCHEDULE 8 - REPORT ON BILLED QUANTITIES AND LINE CHARGE REVENUES

This schedule requires the billed quantities and associated line charge revenues for each price category code used by the EDS in its pricing schedules. Information is also required on the number of CPs that are included in each consumer group or price category code, and the energy delivered to these CPs. EDSs should feel free to adjust the page break of this schedule, to assist with readability if needed.

see ref

8(i): Billed Quantities by Price Component

| Consumer group name or price category code | Standardized connection types | Standard or non-standard consumer group (specify) | Average no. of CPs in disclosure year | Energy delivered to CPs in disclosure year (MWh) |
|--|-------------------------------|---|---------------------------------------|--|
| Overnighting | Overnighting | Standard | 462 | 16,644 |
| Residential General Connections - Uncontrolled | Residential | Standard | 30,794 | 227,823 |
| Residential General Connections - Controlled | Residential | Standard | 169,177 | 1,273,053 |
| Small General Connections - Uncontrolled | Commercial | Standard | 7,981 | 60,001 |
| Small General Connections - Controlled | Commercial | Standard | 2,386 | 23,550 |
| Medium General Connections - Uncontrolled | Commercial | Standard | 9,772 | 73,159 |
| Medium General Connections - Controlled | Commercial | Standard | 1,056 | 41,464 |
| Large General Connections - Uncontrolled | Commercial | Standard | 3,748 | 29,957 |
| Large General Connections - Controlled | Commercial | Standard | 1,029 | 102,627 |
| Major Connections and Embedded Networks | Commercial | Standard | 556 | 844,322 |
| Large Capacity Connections | Industrial | Non-standard | 15 | 174,932 |
| Standard consumer total: | | | 227,661 | 3,344,133 |
| Non-standard consumer total: | | | 15 | 174,932 |
| Total for all consumers: | | | 227,676 | 3,519,065 |

Add extra rows for additional consumer groups or price category codes as necessary

8(ii): Line Charge Revenues (\$000) by Price Component

| Consumer group name or price category code | Standardized connection types | Standard or non-standard consumer group (specify) | Total line charge revenue in disclosure year |
|--|-------------------------------|---|--|
| Overnighting | Overnighting | Standard | \$1,338 |
| Residential General Connections - Uncontrolled | Residential | Standard | \$21,941 |
| Residential General Connections - Controlled | Residential | Standard | \$120,933 |
| Small General Connections - Uncontrolled | Commercial | Standard | \$6,905 |
| Small General Connections - Controlled | Commercial | Standard | \$2,179 |
| Medium General Connections - Uncontrolled | Commercial | Standard | \$17,218 |
| Medium General Connections - Controlled | Commercial | Standard | \$3,586 |
| Large General Connections - Uncontrolled | Commercial | Standard | \$3,317 |
| Large General Connections - Controlled | Commercial | Standard | \$4,008 |
| Major Connections and Embedded Networks | Commercial | Standard | \$37,222 |
| Large Capacity Connections | Industrial | Non-standard | \$4,027 |
| Standard consumer total: | | | \$154,145 |
| Non-standard consumer total: | | | \$4,027 |
| Total for all consumers: | | | \$158,172 |

Add extra rows for additional consumer groups or price category codes as necessary

8(iii): Number of CPs directly billed

Number of directly billed CPs at year end

33

Billed quantities by price component

| Standardized price component | Daily fixed charge - \$/day | |
|------------------------------|-----------------------------------|------------------------------|
| EDS defined price component | Fixed Daily Charge - \$/month/day | |
| | Distribution billed quantity | Transmission billed quantity |
| | 53,929 | 53,929 |
| | 30,226 | 30,226 |
| | 167,520 | 167,520 |
| | 7,473 | 7,473 |
| | 2,353 | 2,353 |
| | 9,767 | 9,767 |
| | 1,056 | 1,056 |
| | 3,748 | 3,748 |
| | 1,029 | 1,029 |
| | 421 | — |
| | 277,588 | 277,587 |
| | — | — |
| | 277,588 | 277,587 |

Line charge revenues (\$000) by price component

| Standardized price component | Daily fixed charge - \$/day | |
|------------------------------|-----------------------------------|----------------------------------|
| EDS defined price component | Fixed Daily Charge - \$/month/day | |
| | Distribution line charge revenue | Transmission line charge revenue |
| | \$247 | \$11 |
| | \$4,900 | \$1,627 |
| | \$22,729 | \$6,074 |
| | \$1,971 | \$595 |
| | \$518 | \$114 |
| | \$2,855 | \$733 |
| | \$3,586 | \$823 |
| | \$411 | \$120 |
| | \$3,073 | — |
| | \$40,131 | \$13,861 |
| | \$40,131 | \$13,861 |

Consumer discounts (\$000)

| Standardized price component | [Select one] | | |
|------------------------------|----------------------------------|----------------------------------|--|
| EDS defined price component | | | |
| | Distribution line charge revenue | Transmission line charge revenue | Total transmission line charge revenue |
| | — | — | \$2,82 |
| | — | — | \$5,382 |
| | — | — | \$30,746 |
| | — | — | \$1,986 |
| | — | — | \$503 |
| | — | — | \$2,289 |
| | — | — | \$3,586 |
| | — | — | \$823 |
| | — | — | \$2,316 |
| | — | — | \$33,627 |
| | — | — | \$3,973 |
| | — | — | \$50,383 |
| | — | — | \$6,074 |
| | — | — | \$52,923 |

| | |
|----------------------------|---------------------------|
| Company Name | Orion New Zealand Limited |
| For Year Ended | 31 March 2025 |
| Network / Sub-network Name | |

SCHEDULE 9a: ASSET REGISTER

This schedule requires a summary of the quantity of assets that make up the network, by asset category and asset class. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref

9a: Asset Register

| | Voltage | Asset category | Asset class | Units | Items at start of year (quantity) | Items at end of year (quantity) | Net change | Data accuracy (1-4) |
|----|---------|-----------------------------|--|-------|-----------------------------------|---------------------------------|------------|---------------------|
| 8 | All | Overhead Line | Concrete poles / steel structure | No. | 27,468 | 27,021 | (447) | 4 |
| 9 | All | Overhead Line | Wood poles | No. | 59,597 | 59,606 | 9 | 4 |
| 10 | All | Overhead Line | Other pole types | No. | — | — | — | N/A |
| 11 | HV | Subtransmission Line | Subtransmission OH up to 66kV conductor | km | 514 | 514 | (0) | 4 |
| 12 | HV | Subtransmission Line | Subtransmission OH 110kV+ conductor | km | — | — | — | N/A |
| 13 | HV | Subtransmission Cable | Subtransmission UG up to 66kV (XLPE) | km | 97 | 43 | (54) | 4 |
| 14 | HV | Subtransmission Cable | Subtransmission UG up to 66kV (Oil pressurised) | km | 40 | 104 | 64 | 4 |
| 15 | HV | Subtransmission Cable | Subtransmission UG up to 66kV (Gas pressurised) | km | — | — | — | N/A |
| 16 | HV | Subtransmission Cable | Subtransmission UG up to 66kV (PILC) | km | 2 | 2 | — | 4 |
| 17 | HV | Subtransmission Cable | Subtransmission UG 110kV+ (XLPE) | km | — | — | — | N/A |
| 18 | HV | Subtransmission Cable | Subtransmission UG 110kV+ (Oil pressurised) | km | — | — | — | N/A |
| 19 | HV | Subtransmission Cable | Subtransmission UG 110kV+ (Gas Pressurised) | km | — | — | — | N/A |
| 20 | HV | Subtransmission Cable | Subtransmission UG 110kV+ (PILC) | km | — | — | — | N/A |
| 21 | HV | Subtransmission Cable | Subtransmission submarine cable | km | — | — | — | N/A |
| 22 | HV | Zone substation Buildings | Zone substations up to 66kV | No. | 83 | 84 | 1 | 3 |
| 23 | HV | Zone substation Buildings | Zone substations 110kV+ | No. | — | — | — | N/A |
| 24 | HV | Zone substation switchgear | 50/66/110kV CB (Indoor) | No. | — | — | — | N/A |
| 25 | HV | Zone substation switchgear | 50/66/110kV CB (Outdoor) | No. | 122 | 135 | 13 | 4 |
| 26 | HV | Zone substation switchgear | 33kV Switch (Ground Mounted) | No. | — | — | — | N/A |
| 27 | HV | Zone substation switchgear | 33kV Switch (Pole Mounted) | No. | 296 | 311 | 15 | 4 |
| 28 | HV | Zone substation switchgear | 33kV RMU | No. | — | — | — | N/A |
| 29 | HV | Zone substation switchgear | 22/33kV CB (Indoor) | No. | 48 | 48 | — | 4 |
| 30 | HV | Zone substation switchgear | 22/33kV CB (Outdoor) | No. | 26 | 26 | — | 4 |
| 31 | HV | Zone substation switchgear | 3.3/6.6/11/22kV CB (ground mounted) | No. | 693 | 716 | 23 | 4 |
| 32 | HV | Zone substation switchgear | 3.3/6.6/11/22kV CB (pole mounted) | No. | — | — | — | N/A |
| 33 | HV | Zone Substation Transformer | Zone Substation Transformers | No. | 81 | 81 | — | 4 |
| 34 | HV | Distribution Line | Distribution OH Open Wire Conductor | km | 3,042 | 3,033 | (8) | 3 |
| 35 | HV | Distribution Line | Distribution OH Aerial Cable Conductor | km | — | — | — | N/A |
| 36 | HV | Distribution Line | SWER conductor | km | 86 | 86 | 0 | 3 |
| 37 | HV | Distribution Cable | Distribution UG XLPE or PVC | km | 1,380 | 1,427 | 48 | 4 |
| 38 | HV | Distribution Cable | Distribution UG PILC | km | 1,508 | 1,510 | 2 | 4 |
| 39 | HV | Distribution Cable | Distribution Submarine Cable | km | — | — | — | N/A |
| 40 | HV | Distribution switchgear | 3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers | No. | 84 | 86 | 2 | 4 |
| 41 | HV | Distribution switchgear | 3.3/6.6/11/22kV CB (Indoor) | No. | 700 | 670 | (30) | 4 |
| 42 | HV | Distribution switchgear | 3.3/6.6/11/22kV Switches and fuses (pole mounted) | No. | 9,212 | 9,229 | 17 | 4 |
| 43 | HV | Distribution switchgear | 3.3/6.6/11/22kV Switch (ground mounted) - except RMU | No. | — | — | — | N/A |
| 44 | HV | Distribution switchgear | 3.3/6.6/11/22kV RMU | No. | 5,064 | 5,184 | 120 | 4 |
| 45 | HV | Distribution Transformer | Pole Mounted Transformer | No. | 6,303 | 6,335 | 32 | 3 |
| 46 | HV | Distribution Transformer | Ground Mounted Transformer | No. | 5,838 | 5,938 | 100 | 3 |
| 47 | HV | Distribution Transformer | Voltage regulators | No. | 15 | 21 | 6 | 4 |
| 48 | HV | Distribution Substations | Ground Mounted Substation Housing | No. | 5,089 | 5,194 | 105 | 4 |
| 49 | LV | LV Line | LV OH Conductor | km | 1,706 | 1,696 | (11) | 2 |
| 50 | LV | LV Cable | LV UG Cable | km | 3,616 | 3,677 | 61 | 3 |
| 51 | LV | LV Street lighting | LV OH/UG Streetlight circuit | km | 3,899 | 3,930 | 31 | 3 |
| 52 | LV | Connections | OH/UG consumer service connections | No. | 225,168 | 229,853 | 4,685 | 2 |
| 53 | All | Protection | Protection relays (electromechanical, solid state and numeric) | No. | 2,753 | 2,812 | 59 | 4 |
| 54 | All | SCADA and communications | SCADA and communications equipment operating as a single system | Lot | 636 | 667 | 31 | 4 |
| 55 | All | Capacitor Banks | Capacitors including controls | No. | 6 | 6 | — | 4 |
| 56 | All | Load Control | Centralised plant | Lot | 45 | 45 | — | 4 |
| 57 | All | Load Control | Relays | No. | 2,187 | 2,238 | 51 | 3 |
| 58 | All | Civils | Cable Tunnels | km | 1 | 1 | — | 4 |
| 59 | | | | | | | | |

| | |
|----------------------------|---------------------------|
| Company Name | Orion New Zealand Limited |
| For Year Ended | 31 March 2025 |
| Network / Sub-network Name | |

SCHEDULE 9c: REPORT ON OVERHEAD LINES AND UNDERGROUND CABLES

This schedule requires a summary of the key characteristics of the overhead line and underground cable network. All units relating to cable and line assets, that are expressed in km, refer to circuit lengths.

sch ref

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9c: Overhead Lines and Underground Cables

| Circuit length by operating voltage (at year end) | Total circuit length | | |
|---|----------------------|------------------|---------------|
| | Overhead (km) | Underground (km) | (km) |
| > 66kV | – | – | – |
| 50kV & 66kV | 274 | 104 | 378 |
| 33kV | 240 | 45 | 285 |
| SWER (all SWER voltages) | 86 | 2 | 88 |
| 22kV (other than SWER) | – | – | – |
| 6.6kV to 11kV (inclusive—other than SWER) | 3,033 | 2,935 | 5,969 |
| Low voltage (< 1kV) | 1,696 | 3,677 | 5,372 |
| Total circuit length (for supply) | 5,330 | 6,763 | 12,093 |

| | | | |
|---|-----|-------|-------|
| Dedicated street lighting circuit length (km) | 895 | 3,035 | 3,930 |
| Circuit in sensitive areas (conservation areas, iwi territory etc) (km) | | | 89 |

| Overhead circuit length by terrain (at year end) | (% of total overhead length) | |
|--|------------------------------|-------------|
| | Circuit length (km) | |
| Urban | 1,822 | 34% |
| Rural | 2,918 | 55% |
| Remote only | 158 | 3% |
| Rugged only | 199 | 4% |
| Remote and rugged | 231 | 4% |
| Unallocated overhead lines | – | – |
| Total overhead length | 5,330 | 100% |

| Length of circuit within 10km of coastline or geothermal areas (where known) | (% of total circuit length) | |
|--|-----------------------------|-----|
| | Circuit length (km) | |
| | 1,855 | 15% |

| Overhead circuit requiring vegetation management | (% of total overhead length) | |
|--|------------------------------|------|
| | Circuit length (km) | |
| | 5,330 | 100% |

Not required after DY2025

| Number of overhead circuit sites at high risk from vegetation damage | Total remaining at high risk at the disclosure year-end | |
|--|---|---|
| | Total newly identified throughout the disclosure year | |
| | – | – |

Not required before DY2026

Breakdown of overhead circuit sites at high risk from vegetation damage at disclosure year-end

| Category of overhead circuit site | Number of overhead circuit sites at high risk from vegetation damage at disclosure year-end | Number of overhead circuit sites involving critical assets at disclosure year-end | |
|-------------------------------------|---|---|-----------------------------------|
| [Single tree] | | | <i>Not required before DY2026</i> |
| [Single tree - Urban] | | | <i>Not required before DY2026</i> |
| [Single tree - Rural] | | | <i>Not required before DY2026</i> |
| [Row of trees] | | | <i>Not required before DY2026</i> |
| [Span between two poles (X metres)] | | | <i>Not required before DY2026</i> |
| [Other] | | | <i>Not required before DY2026</i> |
| Total number of sites | – | – | <i>Not required before DY2026</i> |

* Insert new rows in table above Total line as necessary

SCHEDULE 9d: REPORT ON EMBEDDED NETWORKS

This schedule requires information concerning embedded networks owned by an EDB that are embedded in another EDB's network or in another embedded network.

sch ref

| sch ref | Location * | Average number of ICPs in disclosure year | Line charge revenue (\$000) |
|---------|---|---|--------------------------------|
| 8 | | | |
| 9 | Rakaia Gorge Embedded Network, upper Rakaia river | 2 | 4 |
| 10 | | | |
| 11 | | | |
| 12 | | | |
| 13 | | | |
| 14 | | | |
| 15 | | | |
| 16 | | | |
| 17 | | | |
| 18 | | | |
| 19 | | | |
| 20 | | | |
| 21 | | | |
| 22 | | | |
| 23 | | | |
| 24 | | | |
| 25 | | | |

* Extend embedded distribution networks table as necessary to disclose each embedded network owned by the EDB which is embedded in another EDB's network or in another embedded network

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| | |
|----------------------------|---------------------------|
| Company Name | Orion New Zealand Limited |
| For Year Ended | 31 March 2025 |
| Network / Sub-network Name | |

SCHEDULE 9e: REPORT ON NETWORK DEMAND

This schedule requires a summary of the key measures of network utilisation for the disclosure year (number of new connections including distributed generation, peak demand and electricity volumes conveyed).

sch ref

| | | | |
|----|---|---------------------------|-------------|
| 8 | 9e(i): Consumer Connections and Decommissionings | | |
| 9 | <i>Number of ICPs connected during year by consumer type</i> | | |
| 10 | | Number of | |
| 11 | <i>Consumer types defined by EDB*</i> | connections (ICPs) | |
| 12 | Streetlighting | 3 | |
| 13 | General | 6,603 | |
| 14 | Irrigation | 5 | |
| 15 | Major customer | 9 | |
| 16 | Large capacity | – | |
| 17 | <i>* include additional rows if needed</i> | | |
| 18 | Connections total | 6,620 | |
| 19 | <i>Number of ICPs decommissioned during year by consumer type</i> | | |
| 20 | | Number of | |
| 21 | <i>Consumer types defined by EDB*</i> | decommissionings | |
| 22 | Streetlighting | 15 | |
| 23 | General | 2,186 | |
| 24 | Irrigation | 1 | |
| 25 | Major customer | 3 | |
| 26 | Large capacity | – | |
| 27 | <i>* include additional rows if needed</i> | | |
| 28 | Decommissionings total | 2,205 | |
| 29 | Distributed generation | | |
| 30 | Number of connections made in year | 1,564 | connections |
| 31 | Capacity of distributed generation installed in year | 15.12 | MVA |
| 32 | | | |
| 33 | 9e(ii): System Demand | | |
| 34 | | | |
| 35 | | Demand at time of | |
| 36 | Maximum coincident system demand | maximum | |
| 37 | GXP demand | coincident | |
| 38 | <i>plus</i> Distributed generation output at HV and above | demand (MW) | |
| 39 | Maximum coincident system demand | 677 | |
| 40 | <i>less</i> Net transfers to (from) other EDBs at HV and above | 1 | |
| 41 | Demand on system for supply to consumers' connection points | 678 | |
| 42 | | 0 | |
| 43 | | 678 | |
| 44 | Electricity volumes carried | | |
| 45 | Electricity supplied from GXPs | Energy (GWh) | |
| 46 | <i>less</i> Electricity exports to GXPs | 3,629 | |
| 47 | <i>plus</i> Electricity supplied from distributed generation | 0 | |
| 48 | <i>less</i> Net electricity supplied to (from) other EDBs | 40 | |
| 49 | Electricity entering system for supply to consumers' connection points | 0 | |
| 50 | <i>less</i> Total energy delivered to ICPs | 3,668 | |
| 51 | Electricity losses (loss ratio) | 3,519 | |
| 52 | | 149 | 4.1% |
| 53 | Load factor | | |
| 54 | | 0.62 | |
| 55 | 9e(iii): Transformer Capacity | | |
| 56 | | (MVA) | |
| 57 | Distribution transformer capacity (EDB owned) | 2,419 | |
| 58 | Distribution transformer capacity (Non-EDB owned) | 215 | |
| 59 | Total distribution transformer capacity | 2,634 | |
| 60 | | (MVA) | |
| 61 | Zone substation transformer capacity (EDB owned) | 1,181 | |
| | Zone substation transformer capacity (Non-EDB owned) | – | |
| | Total zone substation transformer capacity | 1,181 | |

| | |
|----------------------------|---------------------------|
| Company Name | Orion New Zealand Limited |
| For Year Ended | 31 March 2025 |
| Network / Sub-network Name | |

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

This schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI and fault rate) for the disclosure year. EDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

| | | | |
|----|---|--------------------------------|------|
| 8 | 10(i): Interruptions | | |
| 9 | Interruptions by class | Number of interruptions | |
| 10 | Class A (planned interruptions by Transpower) | 1 | |
| 11 | Class B (planned interruptions on the network) | 786 | |
| 12 | Class C (unplanned interruptions on the network) | 787 | |
| 13 | Class D (unplanned interruptions by Transpower) | 7 | |
| 14 | Class E (unplanned interruptions of EDB owned generation) | - | |
| 15 | Class F (unplanned interruptions of generation owned by others) | - | |
| 16 | Class G (unplanned interruptions caused by another disclosing entity) | - | |
| 17 | Class H (planned interruptions caused by another disclosing entity) | - | |
| 18 | Class I (interruptions caused by parties not included above) | 7 | |
| 19 | Total | 1,588 | |
| 20 | | | |
| 21 | Interruption restoration | ≤3Hrs >3hrs | |
| 22 | Class C interruptions restored within | 590 | 197 |
| 23 | | | |
| 24 | SAIFI and SAIDI by class | SAIFI SAIDI | |
| 25 | Class A (planned interruptions by Transpower) | 0.00 | 0.0 |
| 26 | Class B (planned interruptions on the network) | 0.10 | 29.8 |
| 27 | Class C (unplanned interruptions on the network) | 0.42 | 23.4 |
| 28 | Class D (unplanned interruptions by Transpower) | 0.01 | 0.4 |
| 29 | Class E (unplanned interruptions of EDB owned generation) | - | - |
| 30 | Class F (unplanned interruptions of generation owned by others) | - | - |
| 31 | Class G (unplanned interruptions caused by another disclosing entity) | - | - |
| 32 | Class H (planned interruptions caused by another disclosing entity) | - | - |
| 33 | Class I (interruptions caused by parties not included above) | 0.00 | 0.1 |
| 34 | Total | 0.53 | 53.7 |
| 35 | | | |
| 36 | Transitional SAIFI and SAIDI (previous method) | SAIFI SAIDI | |
| 37 | Class B (planned interruptions on the network) | - | - |
| 38 | Class C (unplanned interruptions on the network) | - | - |
| 39 | | | |

Where EDBs do not currently record their SAIFI and SAIDI values using the 'multi-count' approach, they shall continue to record their SAIFI and SAIDI values on the same basis that they employed as at 31 March 2023 as 'Transitional SAIFI' and 'Transitional SAIDI' values, in addition to their SAIFI and SAIDI values (Classes B & C) using the 'multi-count approach'. This is a transitional reporting requirement that shall be in place for the 2024, 2025, and 2026 disclosure years.

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

This schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI and fault rate) for the disclosure year. EDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

10(ii): Class C Interruptions and Duration by Cause

| Cause | SAIFI | SAIDI |
|--------------------------|-------|-------|
| Lightning | 0.00 | 0.0 |
| Vegetation | 0.03 | 3.2 |
| Adverse weather | – | – |
| Adverse environment | 0.00 | 0.0 |
| Third party interference | 0.12 | 5.7 |
| Wildlife | 0.01 | 0.8 |
| Human error | 0.04 | 0.9 |
| Defective equipment | 0.19 | 10.2 |
| Other cause | 0.01 | 0.8 |
| Unknown | 0.03 | 1.7 |

| Breakdown of third party interference | SAIFI | SAIDI |
|---------------------------------------|-------|-------|
| Dig-in | 0.03 | 1.3 |
| Overhead contact | 0.06 | 0.7 |
| Vandalism | 0.01 | 1.5 |
| Vehicle damage | 0.02 | 2.0 |
| Other | 0.00 | 0.1 |

| Breakdown of vegetation interruptions (vegetation cause) | SAIFI | SAIDI |
|--|-------|-------|
| In-zone | – | – |
| Out-of-zone | – | – |

Not required before DY2026
Not required before DY2026

10(iii): Class B Interruptions and Duration by Main Equipment Involved

| Main equipment involved | SAIFI | SAIDI |
|------------------------------------|-------|-------|
| Subtransmission lines | – | – |
| Subtransmission cables | – | – |
| Subtransmission other | 0.01 | 0.1 |
| Distribution lines (excluding LV) | 0.06 | 18.6 |
| Distribution cables (excluding LV) | 0.00 | 0.5 |
| Distribution other (excluding LV) | 0.03 | 10.6 |

10(iv): Class C Interruptions and Duration by Main Equipment Involved

| Main equipment involved | SAIFI | SAIDI |
|------------------------------------|-------|-------|
| Subtransmission lines | 0.07 | 1.2 |
| Subtransmission cables | – | – |
| Subtransmission other | 0.04 | 0.8 |
| Distribution lines (excluding LV) | 0.12 | 12.4 |
| Distribution cables (excluding LV) | 0.17 | 8.2 |
| Distribution other (excluding LV) | 0.03 | 0.8 |

10(v): Fault Rate

| Main equipment involved | Number of Faults | Circuit length (km) | Fault rate (faults per 100km) |
|------------------------------------|------------------|---------------------|-------------------------------|
| Subtransmission lines | 5 | 514 | 0.97 |
| Subtransmission cables | – | 149 | – |
| Subtransmission other | 3 | | |
| Distribution lines (excluding LV) | 480 | 3,120 | 15.39 |
| Distribution cables (excluding LV) | 124 | 2,937 | 4.22 |
| Distribution other (excluding LV) | 85 | | |
| Total | 697 | | |

| | |
|----------------------------|---------------------------|
| Company Name | Orion New Zealand Limited |
| For Year Ended | 31 March 2025 |
| Network / Sub-network Name | |

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

This schedule requires a summary of the key measures of network reliability (interruptions, SAIDI, SAIFI and fault rate) for the disclosure year. EDBs must provide explanatory comment on their network reliability for the disclosure year in Schedule 14 (Explanatory notes to templates). The SAIFI and SAIDI information is part of audited disclosure information (as defined in section 1.4 of this ID determination), and so is subject to the assurance report required by section 2.8.

10(vi): Worst-performing feeders (unplanned)

SAIDI

| Rank | Feeder name | Unplanned SAIDI values | Number of Unplanned Interruptions | Most Common Cause of Unplanned Interruptions | Circuit Length of Feeder | Number of ICPs | % of Feeder Overhead (optional) |
|------|--------------------------|------------------------|-----------------------------------|--|--------------------------|----------------|---------------------------------|
| 1 | Castle Hill GXP Unit 642 | 1.336854728 | 17 | Defective equipment | 74.3 | 270 | - |
| 2 | Hawthornden Unit 29 | 1.041088309 | 3 | Defective equipment | 4.0 | 628 | - |
| 3 | Brookside Unit 124 | 1.030374776 | 35 | Wildlife | 79.9 | 503 | - |
| 4 | Duvauchelle Unit 123 | 0.875781881 | 31 | Defective equipment | 102.0 | 805 | - |
| 5 | Motukarara Unit 111 | 0.792691605 | 12 | Defective equipment | 66.1 | 331 | - |
| 6 | Rollleston Unit 111 | 0.777827072 | 8 | Defective equipment | 39.4 | 539 | - |
| 7 | Motukarara Unit 112 | 0.672396538 | 28 | Unknown | 48.4 | 288 | - |
| 8 | Weedons Unit 112 | 0.58184278 | 14 | Defective equipment | 60.9 | 616 | - |
| 9 | Rollleston Unit 123 | 0.574221633 | 2 | Third Party Interference | 13.3 | 869 | - |
| 10 | Belfast Unit 19 | 0.530273746 | 18 | Third Party Interference | 33.9 | 1390 | - |
| 11 | Halswell Unit 4 | 0.437864352 | 1 | Defective equipment | 12.2 | 1622 | - |
| 12 | Little River Unit 111 | 0.405664687 | 5 | Defective equipment | 21.0 | 98 | - |
| 13 | Larcomb Unit 122 | 0.391344836 | 1 | Third Party Interference | 21.3 | 1279 | - |
| 14 | Larcomb Unit 112 | 0.385199599 | 5 | Vegetation | 41.9 | 423 | - |

[†] Extend table as necessary to disclose all worst-performing feeders

SAIFI

| Rank | Feeder name | Unplanned SAIFI values | Interruptions | Unplanned Interruptions | Circuit Length of Feeder | Number of ICPs | (optional) |
|------|---------------------|------------------------|---------------|--------------------------|--------------------------|----------------|------------|
| 1 | Hawthornden Unit 29 | 0.017126718 | 3 | Defective equipment | 4.0 | 628 | - |
| 2 | Belfast Unit 19 | 0.012663844 | 18 | Third Party Interference | 33.9 | 1390 | - |
| 3 | Heathcote Unit 7 | 0.011350459 | 1 | Defective equipment | 4.6 | 0 | - |
| 4 | Larcomb Unit 122 | 0.009110236 | 1 | Third Party Interference | 21.3 | 1279 | - |
| 5 | Rollleston Unit 123 | 0.008903785 | 2 | Third Party Interference | 13.3 | 869 | - |
| 6 | Brookside Unit 124 | 0.008767614 | 35 | Wildlife | 79.9 | 503 | - |
| 7 | Weedons Unit 112 | 0.008398637 | 14 | Defective equipment | 60.9 | 616 | - |
| 8 | Rollleston Unit 111 | 0.007401518 | 8 | Defective equipment | 39.4 | 539 | - |
| 9 | Lincobn Unit 112 | 0.007238892 | 1 | Third Party Interference | 14.0 | 1375 | - |
| 10 | Motukarara Unit 112 | 0.007181888 | 28 | Unknown | 48.4 | 288 | - |
| 11 | Halswell Unit 4 | 0.007098429 | 1 | Defective equipment | 12.2 | 1622 | - |
| 12 | Prebbleton Unit 113 | 0.006461503 | 21 | Defective equipment | 44.4 | 353 | - |
| 13 | Weedons Unit 122 | 0.006395614 | 13 | Defective equipment | 57.7 | 536 | - |
| 14 | Dallington Unit 8 | 0.006145237 | 1 | Defective equipment | 7.1 | 1241 | - |

[†] Extend table as necessary to disclose all worst-performing feeders

Customer Impact

| Rank | Feeder name | Customer Impact Ratio | Number of Unplanned Interruptions | Most Common Cause of Unplanned Interruptions | Circuit Length of Feeder | Number of ICPs | % of Feeder Overhead (optional) |
|------|--------------------------|-----------------------|-----------------------------------|--|--------------------------|----------------|---------------------------------|
| 1 | Castle Hill GXP Unit 642 | 1127.196296 | 17 | Defective equipment | 74.3 | 270 | - |
| 2 | Little River Unit 111 | 942.3673469 | 5 | Defective equipment | 21.0 | 98 | - |
| 3 | Motukarara Unit 111 | 545.1983958 | 12 | Defective equipment | 66.1 | 331 | - |
| 4 | Motukarara Unit 112 | 531.4791667 | 28 | Unknown | 48.4 | 288 | - |
| 5 | Duvauchelle Unit 122 | 504.1972789 | 5 | Defective equipment | 28.9 | 147 | - |
| 6 | Brookside Unit 124 | 466.3439364 | 35 | Wildlife | 79.9 | 503 | - |
| 7 | Hawthornden Unit 29 | 377.4044586 | 3 | Defective equipment | 4.0 | 628 | - |
| 8 | Rollleston Unit 111 | 328.528757 | 8 | Defective equipment | 39.4 | 539 | - |
| 9 | Bankside Unit 113 | 326.7159091 | 8 | Vegetation | 28.5 | 88 | - |
| 10 | Killinchy Unit 112 | 324.7013689 | 6 | Third Party Interference | 39.6 | 144 | - |
| 11 | Coleridge GXP Unit 1022 | 295.3740458 | 10 | Defective equipment | 81.4 | 131 | - |
| 12 | Duvauchelle Unit 125 | 280.7058824 | 4 | Vegetation | 12.7 | 34 | - |
| 13 | Highfield Unit 113 | 263.4671533 | 7 | Third Party Interference | 45.0 | 137 | - |
| 14 | Duvauchelle Unit 123 | 247.6732919 | 31 | Defective equipment | 102.0 | 805 | - |

[†] Extend table as necessary to disclose all worst-performing feeders

SCHEDULE 10B: REPORT ON INTERRUPTIONS

This schedule requires raw interruption data for the reporting year. SIB and Skill is to be recorded using the multi-count approach. Where multiple feeders are affected, the interruption records to be split into multiple interruptions, i.e. one interruption record per feeder. This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and is to be subject to the assurance report required by section 3.8.

| Line No. | Account Name | Start Date | End Date | Duration (min) | Category | Severity | Impact | Notes |
|----------|--------------|------------|----------|----------------|----------|----------|------------------|------------------|
| 552 | WIND 21228-4 | 08/12/24 | 08/12/24 | 2308 | Network | Major | Network backhaul | Network backhaul |
| 553 | WIND 26228-4 | 08/12/24 | 08/12/24 | 45 | Network | Minor | Network backhaul | Network backhaul |
| 554 | WIND 26228-4 | 08/12/24 | 08/12/24 | 132 | Network | Minor | Network backhaul | Network backhaul |
| 555 | WIND 26228-4 | 08/12/24 | 08/12/24 | 333 | Network | Minor | Network backhaul | Network backhaul |
| 556 | WIND 26228-4 | 08/12/24 | 08/12/24 | 502 | Network | Minor | Network backhaul | Network backhaul |
| 557 | WIND 26228-4 | 08/12/24 | 08/12/24 | 5446 | Network | Minor | Network backhaul | Network backhaul |
| 558 | WIND 26228-4 | 08/12/24 | 08/12/24 | 46 | Network | Minor | Network backhaul | Network backhaul |
| 559 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2029 | Network | Minor | Network backhaul | Network backhaul |
| 560 | WIND 26228-4 | 08/12/24 | 08/12/24 | 28 | Network | Minor | Network backhaul | Network backhaul |
| 561 | WIND 26228-4 | 08/12/24 | 08/12/24 | 45 | Network | Minor | Network backhaul | Network backhaul |
| 562 | WIND 26228-4 | 08/12/24 | 08/12/24 | 81 | Network | Minor | Network backhaul | Network backhaul |
| 563 | WIND 26228-4 | 08/12/24 | 08/12/24 | 129 | Network | Minor | Network backhaul | Network backhaul |
| 564 | WIND 26228-4 | 08/12/24 | 08/12/24 | 171 | Network | Minor | Network backhaul | Network backhaul |
| 565 | WIND 26228-4 | 08/12/24 | 08/12/24 | 215 | Network | Minor | Network backhaul | Network backhaul |
| 566 | WIND 26228-4 | 08/12/24 | 08/12/24 | 262 | Network | Minor | Network backhaul | Network backhaul |
| 567 | WIND 26228-4 | 08/12/24 | 08/12/24 | 318 | Network | Minor | Network backhaul | Network backhaul |
| 568 | WIND 26228-4 | 08/12/24 | 08/12/24 | 376 | Network | Minor | Network backhaul | Network backhaul |
| 569 | WIND 26228-4 | 08/12/24 | 08/12/24 | 434 | Network | Minor | Network backhaul | Network backhaul |
| 570 | WIND 26228-4 | 08/12/24 | 08/12/24 | 492 | Network | Minor | Network backhaul | Network backhaul |
| 571 | WIND 26228-4 | 08/12/24 | 08/12/24 | 550 | Network | Minor | Network backhaul | Network backhaul |
| 572 | WIND 26228-4 | 08/12/24 | 08/12/24 | 608 | Network | Minor | Network backhaul | Network backhaul |
| 573 | WIND 26228-4 | 08/12/24 | 08/12/24 | 666 | Network | Minor | Network backhaul | Network backhaul |
| 574 | WIND 26228-4 | 08/12/24 | 08/12/24 | 724 | Network | Minor | Network backhaul | Network backhaul |
| 575 | WIND 26228-4 | 08/12/24 | 08/12/24 | 782 | Network | Minor | Network backhaul | Network backhaul |
| 576 | WIND 26228-4 | 08/12/24 | 08/12/24 | 840 | Network | Minor | Network backhaul | Network backhaul |
| 577 | WIND 26228-4 | 08/12/24 | 08/12/24 | 898 | Network | Minor | Network backhaul | Network backhaul |
| 578 | WIND 26228-4 | 08/12/24 | 08/12/24 | 956 | Network | Minor | Network backhaul | Network backhaul |
| 579 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1014 | Network | Minor | Network backhaul | Network backhaul |
| 580 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1072 | Network | Minor | Network backhaul | Network backhaul |
| 581 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1130 | Network | Minor | Network backhaul | Network backhaul |
| 582 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1188 | Network | Minor | Network backhaul | Network backhaul |
| 583 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1246 | Network | Minor | Network backhaul | Network backhaul |
| 584 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1304 | Network | Minor | Network backhaul | Network backhaul |
| 585 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1362 | Network | Minor | Network backhaul | Network backhaul |
| 586 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1420 | Network | Minor | Network backhaul | Network backhaul |
| 587 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1478 | Network | Minor | Network backhaul | Network backhaul |
| 588 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1536 | Network | Minor | Network backhaul | Network backhaul |
| 589 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1594 | Network | Minor | Network backhaul | Network backhaul |
| 590 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1652 | Network | Minor | Network backhaul | Network backhaul |
| 591 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1710 | Network | Minor | Network backhaul | Network backhaul |
| 592 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1768 | Network | Minor | Network backhaul | Network backhaul |
| 593 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1826 | Network | Minor | Network backhaul | Network backhaul |
| 594 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1884 | Network | Minor | Network backhaul | Network backhaul |
| 595 | WIND 26228-4 | 08/12/24 | 08/12/24 | 1942 | Network | Minor | Network backhaul | Network backhaul |
| 596 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2000 | Network | Minor | Network backhaul | Network backhaul |
| 597 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2058 | Network | Minor | Network backhaul | Network backhaul |
| 598 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2116 | Network | Minor | Network backhaul | Network backhaul |
| 599 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2174 | Network | Minor | Network backhaul | Network backhaul |
| 600 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2232 | Network | Minor | Network backhaul | Network backhaul |
| 601 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2290 | Network | Minor | Network backhaul | Network backhaul |
| 602 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2348 | Network | Minor | Network backhaul | Network backhaul |
| 603 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2406 | Network | Minor | Network backhaul | Network backhaul |
| 604 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2464 | Network | Minor | Network backhaul | Network backhaul |
| 605 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2522 | Network | Minor | Network backhaul | Network backhaul |
| 606 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2580 | Network | Minor | Network backhaul | Network backhaul |
| 607 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2638 | Network | Minor | Network backhaul | Network backhaul |
| 608 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2696 | Network | Minor | Network backhaul | Network backhaul |
| 609 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2754 | Network | Minor | Network backhaul | Network backhaul |
| 610 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2812 | Network | Minor | Network backhaul | Network backhaul |
| 611 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2870 | Network | Minor | Network backhaul | Network backhaul |
| 612 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2928 | Network | Minor | Network backhaul | Network backhaul |
| 613 | WIND 26228-4 | 08/12/24 | 08/12/24 | 2986 | Network | Minor | Network backhaul | Network backhaul |
| 614 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3044 | Network | Minor | Network backhaul | Network backhaul |
| 615 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3102 | Network | Minor | Network backhaul | Network backhaul |
| 616 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3160 | Network | Minor | Network backhaul | Network backhaul |
| 617 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3218 | Network | Minor | Network backhaul | Network backhaul |
| 618 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3276 | Network | Minor | Network backhaul | Network backhaul |
| 619 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3334 | Network | Minor | Network backhaul | Network backhaul |
| 620 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3392 | Network | Minor | Network backhaul | Network backhaul |
| 621 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3450 | Network | Minor | Network backhaul | Network backhaul |
| 622 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3508 | Network | Minor | Network backhaul | Network backhaul |
| 623 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3566 | Network | Minor | Network backhaul | Network backhaul |
| 624 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3624 | Network | Minor | Network backhaul | Network backhaul |
| 625 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3682 | Network | Minor | Network backhaul | Network backhaul |
| 626 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3740 | Network | Minor | Network backhaul | Network backhaul |
| 627 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3798 | Network | Minor | Network backhaul | Network backhaul |
| 628 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3856 | Network | Minor | Network backhaul | Network backhaul |
| 629 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3914 | Network | Minor | Network backhaul | Network backhaul |
| 630 | WIND 26228-4 | 08/12/24 | 08/12/24 | 3972 | Network | Minor | Network backhaul | Network backhaul |
| 631 | WIND 26228-4 | 08/12/24 | 08/12/24 | 4030 | Network | Minor | Network backhaul | Network backhaul |
| 632 | WIND 26228-4 | 08/12/24 | 08/12/24 | 4088 | Network | Minor | Network backhaul | Network backhaul |
| 633 | WIND 26228-4 | 08/12/24 | 08/12/24 | 4146 | Network | Minor | Network backhaul | Network backhaul |
| 634 | WIND 26228-4 | 08/12/24 | 08/12/24 | 4204 | Network | Minor | Network backhaul | Network backhaul |
| 635 | WIND 26228-4 | 08/12/24 | 08/12/24 | 4262 | Network | Minor | Network backhaul | Network backhaul |
| 636 | WIND 26228-4 | 08/12/24 | 08/12/24 | 4320 | Network | Minor | Network backhaul | Network backhaul |
| 637 | WIND 26228-4 | 08/12/24 | 08/12/24 | 4378 | Network | Minor | Network backhaul | Network backhaul |
| 638 | WIND 26228-4 | 08/12/24 | 08/12/24 | 4436 | Network | Minor | Network backhaul | Network backhaul |
| 639 | WIND 26228-4 | 08/12/24 | 08/12/24 | 4494 | Network | Minor | Network backhaul | Network backhaul |
| 640 | WIND 26228-4 | 08/12/24 | 08/12/24 | 4552 | Network | Minor | Network backhaul | Network backhaul |

SCHEDULE 10b: REPORT ON INTERRUPTIONS

This schedule requires no retrospective data for the reporting year. MD and Skill is to be recorded using the multi-count approach. Where multiple feeders are affected, the interruption records to be split into multiple interruptions, i.e., one interruption record per feeder. This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and is to be subject to the assurance report required by section 3.8.

| 784 | MD | Skill | Interruption Description | Start Time | End Time | Duration (min) | Category | Impact | Resolution |
|-----|----|-------|--------------------------|------------|----------|----------------|----------|--------|------------|
| 784 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 785 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 786 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 787 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 788 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 789 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 790 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 791 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 792 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 793 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 794 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 795 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 796 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 797 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 798 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 799 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 800 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 801 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 802 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 803 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 804 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 805 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 806 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 807 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 808 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 809 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 810 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 811 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 812 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 813 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 814 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 815 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 816 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 817 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 818 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 819 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 820 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 821 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 822 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |
| 823 | MD | Skill | MD-21315-M | 08:30:11 | 08:30:11 | 0:00:00 | MD | 1:00 | Planned |

SCHEDULE 10B: REPORT ON INTERRUPTIONS

This schedule requires raw interruption data for the reporting year. SIB and Skill is to be recorded using the multi-count approach. Where multiple feeders are affected, the interruption records to be split into multiple interruptions, i.e. one interruption record per feeder. This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and is, subject to the assurance report required by section 3.8.

| Line No | Account Name | Start Date | End Date | Duration (min) | Time of Day | Day of Week | Location | Equipment | Operator | Reason | Category | Priority | Impact | Resolution | Notes |
|---------|--------------|------------|------------|----------------|-------------|-------------|--------------------|--------------------|------------|--------|----------|----------|--------|------------|---------|
| 874 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 875 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 876 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 877 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 878 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 879 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 880 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 881 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 882 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 883 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 884 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 885 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 886 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 887 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 888 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 889 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 890 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 891 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 892 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 893 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 894 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 895 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 896 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 897 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 898 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 899 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 900 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 901 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 902 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 903 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 904 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 905 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 906 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 907 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 908 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 909 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 910 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 911 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 912 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 913 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |
| 914 | WCD-210821.4 | 08/13/2024 | 08/13/2024 | 15.27 | 15:27 | Monday | Stockdale Lane 121 | Stockdale Lane 121 | 08/13/2024 | 15:27 | Monday | 15:27 | 15:42 | 15:42 | Revised |

SCHEDULE 10B: REPORT ON INTERRUPTIONS

This schedule requires no interruption data for the reporting year. MID and Skill is to be recorded using the multi-count approach. Where multiple feeders are affected, the interruption records to be split into multiple interruptions, i.e. one interruption record per feeder. This information is part of audited disclosure information (as defined in section 1.4 of the ID determination), and is subject to the assurance report required by section 3.8.

| Year | Feeder ID | Feeder Name | Interruption Date | Start Time | End Time | Duration (min) | Category | Impact | Notes |
|------|------------|-------------|-------------------|------------|----------|----------------|----------|--------|----------------------------------|
| 1774 | SCD-2128-P | McIntosh Rd | 24/02/25 | 11:46:00 | 11:51:00 | 5 | Planned | 1 | Planned Interruption (See Model) |
| 1775 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1776 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1777 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1778 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1779 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1780 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1781 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1782 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1783 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1784 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1785 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1786 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1787 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1788 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1789 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1790 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1791 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1792 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1793 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1794 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1795 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1796 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1797 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1798 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1799 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1800 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1801 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1802 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1803 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |
| 1804 | SCD-2127-P | McIntosh Rd | 24/02/25 | 11:51:00 | 12:00:00 | 9 | Planned | 1 | Planned Interruption |

Company Orion New Zealand Limited

Year ended 31 March 2025

Schedule 14 Mandatory Explanatory Notes

1. This schedule requires EDBs to provide explanatory notes to information provided in accordance with clauses 2.3.1, 2.4.21, 2.4.22, and subclauses 2.5.1(1)(f), and 2.5.2(1)(e).
2. This schedule is mandatory—EDBs must provide the explanatory comment specified below, in accordance with clause 2.7.1. Information provided in boxes 1 to 11 of this schedule is part of the audited disclosure information, and so is subject to the assurance requirements specified in section 2.8.
3. Schedule 15 (Voluntary Explanatory Notes to Schedules) provides for EDBs to give additional explanation of disclosed information should they elect to do so.

Return on Investment (schedule 2)

4. In the box below, comment on return on investment as disclosed in Schedule 2. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 1: Comment on return on investment (ROI)

The Commission determined price paths for price and quality controlled EDBs from 1 April 2020 using a WACC of 4.23.

Our FY25 post-tax regulatory ROI was 4.81% (FY24: 6.06%; FY23: 8.8%). FY25's ROI includes a 2.53% CPI movement (FY24: 4.02%, FY23: 6.65%).

No items were reclassified in FY24 or FY25.

Regulatory Profit (Schedule 3)

5. In the box below, comment on regulatory profit for the disclosure year as disclosed in Schedule 3. This comment must include-
 - 5.1 a description of material items included in other regulated income (other than gains / (losses) on asset disposals), as disclosed in 3(i) of Schedule 3.
 - 5.2 information on reclassified items in accordance with subclause 2.7.1(2).

Box 2: Comment on regulatory profit

Other regulated income included (pre-tax):

| | FY25 |
|--|-------------|
| | \$m |
| Rental revenue and recovery of outgoings | 2.7 |
| Recoveries from third parties who cause to damage to our network | 1.0 |
| Other | 0.6 |
| Total | <u>4.3</u> |

Some significant items have affected regulatory profit in recent years. Our high-level summary to normalise for these to derive “underlying regulatory profit” is as follows – all figures post-tax:

| | FY25 | FY24 | FY23 | FY22 | FY21 | FY20 |
|----------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|
| | \$m | \$m | \$m | \$m | \$m | \$m |
| Regulatory profit – as disclosed | 77 | 89 | 116 | 118 | 56 | 81 |
| Less indexed asset revaluations | (39) | (58) | (87) | (81) | (17) | (28) |
| Add back loss on asset disposals | - | 1 | - | 1 | - | 1 |
| Underlying regulatory profit | <u>38</u> | <u>32</u> | <u>29</u> | <u>38</u> | <u>39</u> | <u>54</u> |

Our underlying profit fell significantly between FY20 and FY21 as the Commerce Commission significantly reduced the WACC rate used for the five-year regulatory period beginning 1 April 2020.

We are permitted to receive a maximum allowable revenue (MAR) for our electricity distribution services under the Commission’s default price path regime. Due to differences between quantity estimates used in price setting and actual quantities which arose during FY25, we estimate that we have charged customers \$14.3m below our MAR for FY25. This amount is still subject to wash-ups as improved information becomes available. We will increase revenue by the final amount plus interest when setting delivery prices in FY27.

No items were reclassified in FY24 or FY25.

Merger and acquisition expenses (3(iv) of Schedule 3)

6. If the EDB incurred merger and acquisitions expenditure during the disclosure year, provide the following information in the box below-
- 6.1 information on reclassified items in accordance with subclause 2.7.1(2)
- 6.2 any other commentary on the benefits of the merger and acquisition expenditure to the EDB.

Box 3: Comment on merger and acquisition expenditure

Not applicable

Value of the Regulatory Asset Base (Schedule 4)

7. In the box below, comment on the value of the regulatory asset base (rolled forward) in Schedule 4. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 4: Comment on the value of the regulatory asset base (rolled forward)

During FY25 our RAB value increased as follows:

| | FY25 \$m |
|--|---------------------|
| Opening RAB value | 1,566 |
| Add new assets commissioned | 148 |
| Add indexed asset revaluation (at CPI) | 39 |
| Less asset disposals at RAB value | (1) |
| Less depreciation and amortisation | (59) |
| Closing RAB value | <u>1,693</u> |

Our \$148m of commissioned assets in FY25 is significantly higher than FY24 (\$114m). In early FY25 we commissioned our new Milton Zone Substation and associated cabling which added \$36.8m to commissioned assets. Of this, approximately \$23.1m was in our works under construction at 31 March 2024.

Regulatory tax allowance: disclosure of permanent differences (5a(i) of Schedule 5a)

8. In the box below, provide descriptions and workings of the material items recorded in the following asterisked categories of 5a(i) of Schedule 5a-

- 8.1 Income not included in regulatory profit / (loss) before tax but taxable;
- 8.2 Expenditure or loss in regulatory profit / (loss) before tax but not deductible;
- 8.3 Income included in regulatory profit / (loss) before tax but not taxable;
- 8.4 Expenditure or loss deductible but not in regulatory profit / (loss) before tax.

Box 5: Regulatory tax: permanent differences

| | FY25 \$m |
|--|---------------------|
| Expenditure that is not deductible: | - |
| Income that is not taxable | - |
| Deductible expenditure that is not in regulatory profit before tax: | (1.7) |
| | <hr/> |
| | (1.7) |
| | <hr/> |

Regulatory tax allowance: disclosure of temporary differences (5a(vi) of Schedule 5a)

9. In the box below, provide descriptions and workings of material items recorded in the asterisked category 'Tax effect of other temporary differences' in 5a(vi) of Schedule 5a.

Box 6: Regulatory tax: temporary differences

| | FY25 \$m |
|---|---------------------------|
| Expenditure timing differences for tax deductibility | 0.4 |
| Internal profits on capex – deductible for tax purposes | (0.1) |
| Other | (0.1) |
| Net total | <hr/> 0.2 <hr/> |

Cost allocation (Schedule 5d)

10. In the box below, comment on cost allocation as disclosed in Schedule 5d. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 7: Comment on cost allocation

We have two wholly-owned subsidiary companies:

- Connetics Limited, an electricity construction and maintenance company
- Orion NZ Ventures Limited, which holds a minor legacy investment in a US venture capital fund. Orion New Zealand Ventures was deregistered on 10 January 2025.

Both are *ring fenced*, with no shared assets and minimal shared costs. Any shared costs are charged to the relevant subsidiary on an arms-length basis, with the revenue treated as regulatory income by Orion. The income received from the lease of the depot by Connetics is recognised as other regulated income as part of rental income in Schedule 3.

From FY21 onwards Orion has undertaken some operations at a group level, in line with Group Strategy and purpose – *Powering a clean and brighter future*. In advancing our strategy we have undertaken a small number of activities which fall outside electricity distribution services, or where our existing electricity distribution customers do not receive all of the benefits which arise from the expenditure. We have either “ring-fenced” those activities “out” or apportioned common costs where our team work on multiple activities, in order to derive the operational costs we have attributed to our electricity distribution business.

For most of the activities where we have apportioned costs to non-distribution activities, we have assessed an amount to be attributed to non-distribution activities. This is management’s retrospective assessment of the value derived from these activities by existing electricity distribution customers, as discussed with our auditors. We have not used timesheets to apportion these activities throughout the year and have instead used a proxy assessment which reflects management’s judgements. Given the very limited extent of our non-distribution activities (\$0.1m in FY25 out of total opex of \$85m) we do not consider it necessary to put more complex recording systems in place – consistent with the proxy approach.

No items were reclassified in FY24 or FY25.

Asset allocation (Schedule 5e)

11. In the box below, comment on asset allocation as disclosed in Schedule 5e. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 8: Comment on asset allocation

We have made no changes to asset allocations in FY24 and FY25.

Capital Expenditure for the Disclosure Year (Schedule 6a)

12. In the box below, comment on expenditure on assets for the disclosure year, as disclosed in Schedule 6a. This comment must include-

12.1 a description of the materiality threshold applied to identify material projects and programmes described in Schedule 6a;

12.2 information on reclassified items in accordance with subclause 2.7.1(2).

Box 9: Comment on capex

Schedule 6a discloses our capex spend (not necessarily commissioned) as follows:

- \$114m (last year: \$129m) for network assets
- \$15m (last year: \$8m) for non-network assets.

Schedules 6a(iii), and 6a(v) to 6a(viii) disclose the large items for each category.

Schedule 6a(iv) discloses \$27m of capex for system growth and \$35m for asset replacement and renewal. Our major projects and programmes in these areas which exceeded \$2m were:

| | System growth \$m | Replacement & renewal \$m |
|---------------------------------------|----------------------------------|--|
| Distribution poles replacement | | 13 |
| 11kV zone circuit breaker replacement | | 5 |
| 11kV switchgear replacement | | 2 |
| LV Panel replacement | | 2 |
| Burnham ZS 66/11 kV substation | 6 | |
| Brookside ZS to Norwood 66kV | 4 | |
| Milton ZS to Hoon Hay ZS 66kV | 3 | |
| Springston ZS 66/11kV | 3 | |
| Bromley ZS to Milton ZS 66kV | 2 | |
| Low voltage reinforcement | 2 | |
| Other projects and programs | 7 | 13 |
| Total | 27 | 35 |

No capex items were reclassified in FY24 or FY25.

Operational Expenditure for the Disclosure Year (Schedule 6b)

13. In the box below, comment on operational expenditure for the disclosure year, as disclosed in Schedule 6b. This comment must include-
- 13.1 Commentary on assets replaced or renewed with asset replacement and renewal operational expenditure, as reported in 6b(i) of Schedule 6b;
 - 13.2 Information on reclassified items in accordance with subclause 2.7.1(2);
 - 13.3 Commentary on any material atypical expenditure included in operational expenditure disclosed in Schedule 6b, a including the value of the expenditure the purpose of the expenditure, and the operational expenditure categories the expenditure relates to.

Box 10: Comment on operational expenditure for the disclosure year

Schedule 6b(i) discloses \$28.0m of FY25 maintenance opex.

There were no material atypical items of expenditure in FY25.

No items were reclassified during FY25.

Variance between forecast and actual expenditure (Schedule 7)

14. In the box below, comment on variance in actual to forecast expenditure for the disclosure year, as reported in Schedule 7. This comment must include information on reclassified items in accordance with subclause 2.7.1(2).

Box 11: Comment on the variance between forecast and actual capex and opex**CAPEX**

Schedule 7(ii) discloses our AMP forecast capex at \$130m and actual capex at \$114m, both excluding non-network expenditure. The key offsetting reasons for this underspend of \$16m are:

| | FY25 \$m |
|---|---------------------|
| Connection-related expenditure (customer-driven) | (8) |
| Asset relocations | (4) |
| Internal labour double-counted in budget | 9 |
| Unscheduled LV minor works | 5 |
| Burnham ZS 66/11kV substation | 4 |
| Hoon Hay ZS 66 kV switchgear and building | 2 |
| 11kV O/H scheduled replacement | 2 |
| Other | <u>6</u> |
| <u>Underspend</u> relative to our AMP forecast | <u>16</u> |

OPEX

Schedule 7(iii) discloses our AMP forecast opex of \$86.5m and actual opex of \$85.1m, both including non-network expenditure. This \$1.4m underspend is due to a \$5.9m underspend in network opex and a \$4.5m overspend in non-network opex.

The key reasons for these two variances are:

| | FY25 \$m |
|---|---------------------|
| Network opex | |
| Service interruptions and emergencies | (1.8) |
| Asset replacement and renewal opex | 3.9 |
| Routine and corrective maintenance and inspection | 0.8 |
| Vegetation management | 3.0 |
| <u>Underspend</u> relative to our AMP forecast | <u>5.9</u> |

| | FY25 \$m |
|--|---------------------|
| Non-network opex | |
| Integrated asset management system | 1.6 |
| Software annual licencing | 1.6 |
| Wages and salaries | 1.0 |
| Customised Price Path | 0.9 |
| Other | (0.6) |
| | <hr/> |
| <u>Overspend</u> relative to our AMP forecast | 4.5 |
| | <hr/> |

From FY18 onwards we capitalise an assessment of the salaries and wages of Orion employees associated with planning and administering capex projects. We made this change for financial reporting, tax and regulatory disclosure purposes.

No opex items were reclassified during FY25.

Information relating to revenues and quantities for the disclosure year

15. In the box below provide-
- 15.1 a comparison of the target revenue disclosed before the start of the disclosure year, in accordance with clause 2.4.1 and subclause 2.4.3(3) to total billed line charge revenue for the disclosure year, as disclosed in Schedule 8; and
 - 15.2 explanatory comment on reasons for any material differences between target revenue and total billed line charge revenue.

Box 12: Comment on revenue for the disclosure year

The following table shows the comparison of target revenue (as disclosed in our “Methodology for driving prices” document) and billed revenue in Schedule 8:

| | FY25 \$m |
|----------------|---------------------------|
| Target Revenue | 257,700 |
| Billed Revenue | <u>258,710</u> |
| Difference | 470 |
| | 0.18% |

The main contributing factor for the difference between target and billed revenue was the time-of-use volume charges for general, streetlighting and irrigation connections being above target. This was the result of demand being higher than forecast.

Network Reliability for the Disclosure Year (Schedule 10)

16. In the box below, comment on network reliability for the disclosure year, as disclosed in Schedule 10.

Box 13: Comment on network reliability for the disclosure year

In particular, where successive interruptions occur (including where a group of customers may be turned off to allow another area to be restored) the outage times are recorded separately for each group affected. Successive interruptions are recorded against the same incident when they occur during the restoration period or are recorded as a separate incident when they occur after the initial incident has been fully restored. Customers who form part of a planned interruption but were not notified are separated out under a different incident and are record as unplanned.

Our reliability information in Schedule 10 has been prepared on a basis consistent with the previous year's disclosure.

Insurance cover

17. In the box below, provide details of any insurance cover for the assets used to provide electricity distribution services, including-
- 17.1 The EDB's approaches and practices in regard to the insurance of assets used to provide electricity distribution services, including the level of insurance;
- 17.2 In respect of any self insurance, the level of reserves, details of how reserves are managed and invested, and details of any reinsurance.

Box 14: Comment on our insurance cover

A summary of our insurance cover is as follows.

We insure our corporate and network buildings and our key substations for their respective estimated replacement values, subject to natural disaster deductibles as follows:

- 1.0% of insured value for post-2004 buildings
- 2.5% of insured value for pre-2004 buildings
- 5.0% of insured value for pre-1935 buildings.

We also insure our other corporate assets and key liability risks.

Our business interruption indemnity period is 18 months.

We have two key uninsured risks that are economically uninsurable for our industry:

- damage to our overhead lines and underground cables – for example, due to a major earthquake
- general lost revenues – for example, due to significant depopulation following a catastrophic event.

We continue to insure our key risks where it is economic to do so, in line with good industry practice.

Amendments to previously disclosed information

18. In the box below, provide information about amendments to previously disclosed information in accordance with clause 2.12.1 in the last 7 years, including:
- 18.1 a description of each error; and
- 18.2 for each error, reference to the web address where the disclosure made in accordance with clause 2.12.1 is publicly disclosed.

Box 15: Disclosure of amendment to previously disclosed information

We have made no amendments to previously disclosed information to correct errors.

Company Name Orion New Zealand Limited

For Year Ended 31 March 2025

Schedule 15 Voluntary Explanatory Notes

1. This schedule enables EDBs to provide, should they wish to-
 - 1.1 additional explanatory comment to reports prepared in accordance with clauses 2.3.1, 2.4.21, 2.4.22, 2.5.1 and 2.5.2;
 - 1.2 information on any substantial changes to information disclosed in relation to a prior disclosure year, as a result of final wash-ups.
2. Information in this schedule is not part of the audited disclosure information, and so is not subject to the assurance requirements specified in section 2.8.
3. Provide additional explanatory comment in the box below.

Voluntary other comments on disclosed information

Schedule 5b (iii)

Our Other related party transactions disclosed in row 36 of schedule 5b are rates levied by our shareholders, as follows:

| | |
|---------------------------|---------------------|
| | \$000 |
| Selwyn District Council | 389 |
| Christchurch City Council | <u>5,510</u> |
| Total | <u>5,899</u> |

Row 36 of schedule 5b does not include:

- Dividends to shareholders
- Subvention and loss offsets made to shareholders
- Non-network financing transactions.

We have attached a separate disclosure schedule which provides additional disclosures about transactions with our related parties, as required by following the Commission's *Input methodologies review – related party transactions*, published 21 December 2017.

Schedule 8

The volume charges applied to general, streetlighting and irrigation connections are calculated from total energy volumes injected into the network, measured at Transpower GXP's and other embedded generation points, less loss adjusted half-hourly metered major customer and large capacity connections volumes. We apply the same volume prices for general, streetlighting and irrigation connection categories. For disclosure reporting, we have apportioned the billed quantities and revenues associated with volumes price components using metered data provided by the retailers.

Schedule 10 - comment on network reliability for the disclosure year

Our reliability information in Schedule 10 has been prepared on a basis consistent with the previous year's disclosure. In particular, when one event has resulted in successive interruptions which individually exceed one minute, we treat each of the successive interruptions as a separate incident in the determination of our SAIFI and SAIDI.

Schedule 10.2 – Worst Performing Feeders: The performance data used to determine Orion's worst performing feeders is inclusive of any outage occurring on the 11kV distribution network, regardless of the voltage class of the asset affected. Where work on LV, 33kV or 66kV assets has required an 11kV distribution outage, these are denoted by 11kV*, 33kV* and 66kV* respectively.

Outages occurring on Sub transmission or 11kV incoming feeders are excluded from this calculation.

Additional related party disclosures

In accordance with clauses 2.3.8 – 2.3.18 of the Electricity Distribution Information Disclosure Determination 2012.

1. Introduction

This document discloses additional information to meet the related party disclosure requirements of the Electricity Distribution Information Disclosure Determination 2012 (IDD).

The IDD requires Orion to publicly disclose:

| Description | IDD reference |
|--|-----------------|
| • Diagram or description of related party transactions | 2.3.8 |
| • Report on related party transactions | Schedule 5b |
| • Summary of procurement policy for procurement from related parties | 2.3.10 |
| • Example of procurement policy in practice | 2.3.12(1) |
| • Representative transactions | 2.3.12(3) & (5) |
| • Policies or procedures that require or have the effect of requiring purchase | 2.3.12(2) |
| • Testing of arms-length representative transactions | 2.3.12(4) |
| • Map of anticipated expenditure and network constraints | 2.3.13 – 2.3.16 |
| • Full disclosure of procurement policy* | 2.3.11 |

*disclose to the Commission only

2. Threshold analysis

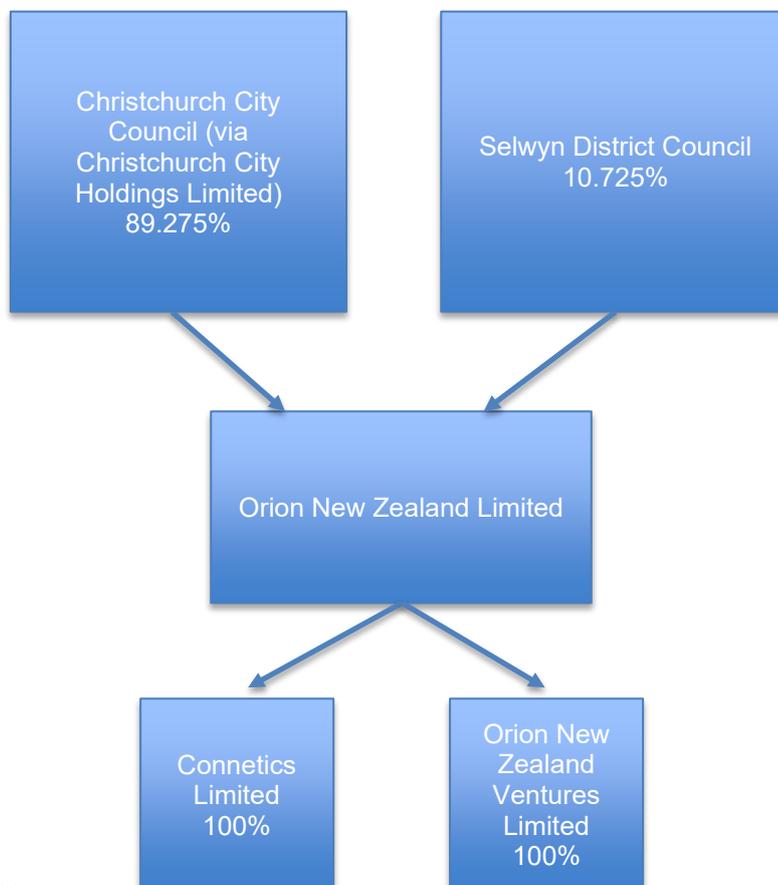
In FY25 the sum of Orion's Opex and capex exceeded the Commission's \$20m de minimis threshold (IDD 2.3.9(1)), and our total related party expenditure exceeded 10% of our total Opex and Capex, so we are required to make these related party disclosures.

In FY25 we spent a total of:

| | 2025 | 2024 |
|---|------------|------------|
| | \$m | \$m |
| Opex (from IDD schedule 6b(i), row 18) | 85 | 82 |
| Capex (from IDD schedule 6a(i), row 25) | 120 | 137 |
| Total expenditure | 205 | 219 |

Excluding payments to directors and senior leadership, Orion’s expenditure with related parties in FY25, as disclosed in IDD schedule 5b, amounted to \$80m (FY24: \$91m), around 43% (FY24: 42%) of our overall capex and opex. This includes \$5m of rates paid to related parties in both years.

3. Clause 2.3.8 Diagram or description of related party transactions



Orion is owned by:

- Christchurch City Holdings Limited (CCHL) – 89.275%
- Selwyn District Council (SDC) – 10.725%.

CCHL is in turn owned 100% by the Christchurch City Council (CCC).

Orion has two wholly-owned subsidiaries:

- Connetics Limited, which undertakes the construction and maintenance of overhead and underground lines and associated equipment required for the delivery of utility and infrastructure services. Connetics was established in 1996
- Orion New Zealand Ventures Limited, which holds Orion’s long-term investment in a US-based technology fund (now in its final stage of settlement).

CCC and SDC both have subsidiary companies and other related parties with which Orion also transacts business.

These material related parties include:

- | | |
|---|-------------|
| • Christchurch International Airport Limited | (CCHL 75%) |
| • Lyttelton Port Company Limited | (CCHL 100%) |
| • Enable Services Limited | (CCHL 100%) |
| • City Care Limited | (CCHL 100%) |
| • EcoCentral Limited | (CCHL 100%) |
| • Development Christchurch Limited | (CCHL 100%) |
| • Venues Otautahi Ltd | (CCC 100%) |
| • Civic Building Ltd | (CCC 100%) |
| • ChristchurchNZ Holdings Ltd | (CCC 100%) |
| • Transwaste Canterbury Ltd | (CCC 38.9%) |
| • CMUA Project Delivery Limited known as Te Kaha Project Delivery Limited | (CCC 100%) |
| • Sicon Limited trading as CORDE | (SDC 100%) |

Orion also has relationships with a large number of related parties where our directors, as Orion key management personnel, are either key management personnel or shareholders. These related parties are listed in our annual report, available on our website (oriongroup.co.nz).

However, other than for Connetics, CCC and SDC, our transactions with our related parties are infrequent and immaterial. Where transactions do occur with these other related parties, they are provided on an arms-length basis. Orion provides delivery services to many of these entities, although in most cases the service is provided through an interposed retailer rather than invoiced and negotiated directly. Lyttelton Port is billed directly as a major customer, but pricing is identical with the methodology and assessment periods applied to all other Orion major customers. A number of CCC sites, Venues Otautahi sites, and Christchurch International Airport are also major customers but are charged on a basis consistent with all other major customers and are not invoiced directly by Orion.

For this reason, we have not provided additional analysis on these related parties, but instead focus our disclosures around Connetics, CCC and SDC as these are more material.

Business relationships with Connetics Limited

Orion established Connetics as a standalone company in 1996 in order to introduce competition to maintenance and construction works.

Historically, Connetics and our other service providers have been awarded much of their work on a lowest-price conforming tender basis – for virtually all works above \$20,000. As a result of COVID we moved from a multi-party competitive tendering model to a sole-source tendering model on a “yours-to-lose” basis with our service providers – to ensure the viability and resilience of our service providers. From FY26 Orion brought procurement back in house and “yours to lose” has been largely discontinued with a change back to a competitive tendering model.

During the "yours to lose" period work allocated to our service providers was on the basis of their work levels using a rolling average over the three prior years. We consider that this move incentivised quality, safety and capability development. We also received regulatory advice from PwC and legal advice as part of this change in procurement practice.

At the end of the FY22 financial year we had PwC review all of our procurement with Connetics. As there has been no material change in the Orion - Connetics relationship during FY24 and FY25 we assessed that remained appropriate.

In addition to the tendered works above, Orion has negotiated certain contracts with Connetics which cover circumstances where the tender approach does not work satisfactorily. We had PwC review each of these contracts in FY22 to ensure that these contracts operate on an arms-length basis.

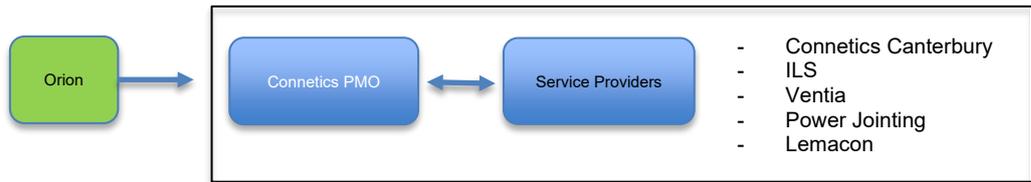
Note: From 1 April 2025 FY26 Orion ceased utilising the Connetics PMO for tendering activities with the in-house Orion procurement team now procuring all goods and services directly.

As a result of the new procurement model contracts being implemented, we were in a transitional phase with respect to contracts during FY25 with the transition away from Connetics PMO procurement on Orions behalf. The status as of March 25 is as follows,

- **PMO Services Agreement: 2024/070E, expired 31-Mar-25**



- Under the PMO(Project Management Office) Services Agreement, the Connetics PMO procures, plans, programmes, and manages projects for Orion. (This activity is now managed by in-house Orion Procurement team effective 1 April 2025)
- During FY25 projects were engaged and contracted directly between Connetics PMO and the Service Providers.
- These are AMP driven Capex and Opex projects. *Note: Customer driven works is still driven through the Orion Connections team.*



PMO Delivery management

- **General & Emergency Works: Current 2019/156E, expires 31-Oct 2025**

- Emergency work is managed by the PMO through the Asset Owners representative (AOR) and is part of their main contract.
- Emergency response works, which uses a schedule of rates. Orion has previously negotiated contracts with unrelated parties for similar works, although as our largest service provider with expertise in a diverse range of fields the largest single emergency response work contract is with Connetics.

Orion still holds emergency contracts with ILS and Ventia.

- During FY22 Orion engaged PwC to perform a review of the arrangements in place for FY22, and also to review the basis for a three-year extension of the contract. PwC considered that Connetics’ margins are reasonable, and the contract meets the arms-length test.

- **Network Stores Management: Current 2023/075E, expires 28-Feb-28 (+ option to extend for 5 years)**



- cable supply. As discussed in section 7 below, Orion has negotiated a contract with Connetics to provide cable to all service providers working on its network to ensure the cable is of an appropriate standard. Connetics’ contracting section is charged at the same rates as external parties – which helps keep a competitive market for construction services. During FY22 PwC reviewed the arrangements and concluded that the risk that Connetics earns excessive margins on the cable supply contract that help it subsidise work in other markets is low.
- network storage and supply. This requires Connetics to provide certain minimum levels of emergency spares and to manage Orion-owned equipment – such as transformers and switchgear. During FY22 Orion engaged PwC to perform a review of the arrangements in place. PwC considered that the contract meets the arms-length standard, and this arrangement was in place for FY25

- **Design Consultancy Agreement: Current 2017/080E, expires 31-Jul-25**



- design work, which uses a schedule of rates. Orion uses several other design consultants as well. In FY22 Orion engaged PwC to perform a review of the intercompany arrangements. PwC determined that rates charged are comparable with those charged by other design service providers and the contract meets the arms-length standard. This includes sole sourced pole design contract works required from the pole inspection contract.
- This contract applied to FY23, FY24 and FY 25.

During FY25 Orion paid Connetics \$80.0m (FY24: \$84.5m) for Opex and Capex related projects. Refer to schedule 5b (iii) of our FY25 Information Disclosures for additional information. Our overall capex has gone up significantly year on year, and Connetics PMO now invoices work to Orion that formally would have been invoiced to Orion directly by the service providers.

Connetics charges Orion a monthly PMO management fee for the management services of the PMO which includes – *PMO direct Costs, PMO Overheads and Connetics Enterprise Overheads*. Orion is the landlord for the Connetics depot located in Islington. The rental on the property has been negotiated on an arms-length basis with both parties taking independent advice. During FY22 Orion engaged PwC to perform a review of the arrangements. PwC confirmed that the lease contract and negotiations reflect arms-length principles. The lease remained in place for FY25. A portion of the lease is recovered through the Emergency works contract, Stores contract and PMO overhead costs.

Orion provides debt funding to Connetics via an intercompany loan, repayable on demand, at a margin above the 90-day bank bill FRA rate intended to replicate genuine funding costs that Connetics would face as a standalone business.

As our former contracting division, Connetics retains a wider range of skills than our other specialist providers and competes in all market segments which is identified within our bounds of service. This is discussed further in the next section.

Business relationships with CCC and SDC

Orion pays rates to both CCC and SDC on an arms-length basis consistent with the Local Government (Rating) Act 2002. Orion also pays other council fees – eg, licenses, resource consents – on an arms-length basis based on the Council’s posted terms and conditions.

- During FY25 Orion paid CCC \$5.5m (2024: \$5.0m) for rates (including rates collected on behalf of Environment Canterbury).
- During FY25 Orion paid SDC \$0.4m (2024: \$0.3m) for rates (including rates collected on behalf of Environment Canterbury).

Refer to schedule 5b (iii) of our FY25 Information Disclosures for additional information.

Orion invoices the CCC and SDC for delivery services through electricity retailers using standard terms and conditions.

Orion also invoices SDC and CCC for:

- a service to the CCC and SDC for managing a database containing the number/types of streetlights, charged to both parties on an arms-length basis
- contributions towards asset relocations. As Roading Authorities, the Councils and NZTA can require Orion to relocate assets we have in the road reserve on a like for like basis. Under the Electricity Act Orion can negotiate with the council (and with NZTA) to contribute towards the cost of these projects. We require a more significant contribution where the assets are placed underground instead of replacing overhead with overhead. Orion determines a charge based on the actual costs of the project, considering the age and condition of the assets being removed and any improvement in capacity or improved functionality of the new assets. This is consistent with how we work with unrelated parties
- new connections to the network, using the same price schedule as for unrelated parties.
- repair costs when the activities of these parties lead to damage to Orion's network. These repairs are invoiced on an identical basis to other damage caused by third parties – a cost recovery of repair costs undertaken by our emergency works service provider.

Orion pays the CCC's share of its dividend to CCHL and also pays interest on intercompany borrowings.

Business relationships with other CCC and SDC-controlled entities:

Orion negotiates with all the CCC and SDC controlled entities on an arm's length basis, ie, as though they were unrelated.

Orion provides delivery services through electricity retailers using standard terms and conditions. Orion invoices Lyttelton Port Company directly for delivery services on the same terms and conditions as for other major customers.

Orion invoices Enable and their contractors for repair costs when the activities of these companies lead to damage to Orion's network. These repairs are invoiced on an identical basis to other damage caused by third parties.

As noted above, Orion has limited interaction with the other CCC and SDC-controlled or associated entities.

4. Summary of procurement policy and practices

We seek to:

- procure goods and services which are fit for purpose
- achieve best value for money over whole-of-life
- encourage open, effective and sustainable arm's length relationships between eligible suppliers
- ensure any purchases from related parties are genuinely arms-length transactions
- behave ethically and have fair and transparent procurement processes that are free from fraud and impropriety
- comply with all applicable legal and contractual obligations
- effectively mitigate and/or manage any potential conflicts of interest in an open and acceptable manner
- treat related and unrelated parties consistently.

Our purchasing occurs in a framework supported by a number of policies and procedures, including our:

- procurement policy, which articulates how we seek to maximise the overall benefits that can be delivered through its procurement activity, enabling us to deliver value for money and ensure lawfulness, fairness and integrity at all times
- delegations of authority policy, through which we establish clear responsibility, authority, scope and involvement in all operational decision making, and maintain adequate control of the business while at the same time empowering employees with adequate responsibility to make decisions
- reporting serious wrongdoing (whistleblower) policy, which aims to facilitate the prompt reporting and investigation of suspected or actual serious wrongdoing, protect those who report serious wrongdoing, and set out our procedure to receive and deal with reported serious wrongdoing
- conflict of interest policy, which aims to ensure that all Orion directors and employees understand and effectively identify, disclose and manage actual or potential conflicts of interest
- fraud and theft policy, which states our commitment to the prevention, deterrence, detection and investigation of fraud and theft, as these will undermine our activities and damage our reputation and the reputation of all of our stakeholders, including our employees and our shareholders
- Matatika – code of ethics, which states the ethical standards required of all Orion directors and employees
- Procurement Manual, provides guidance on the expectations and procedures involved with the procurement of all goods and services (to be updated FY26).
- environmental sustainability policy, which outlines our commitment to environmental and social responsibility in our operations, and
- processes published within our asset management plan.

We utilise Orion-authorized service providers for our network works. These service providers must show competence in the specialised areas of work and comply with relevant legislation – eg, Health, safety and environmental responsibilities.

It is in the best interests of Orion and our customers' best interest to encourage open, effective and sustainable arm's-length relationships with suppliers. This approach ensures a competitive market, ongoing skill development and a resilient service provider pool available to support our business.

Orion established Connetics as a standalone company in 1996 to introduce competition to maintenance and construction works. Connetics is treated at arm's-length – that is, no differently from any other service provider in our tendering processes.

We have a number of service providers in each of our network construction and maintenance activities, as follows:

| Category of Work | Authorised Service Providers | | |
|-----------------------|------------------------------|---------------------|--|
| | Related Party | | Total Number of Authorised Service Providers |
| | Connetics | Non-related Parties | |
| Underground works | 1 | 2 | 3 |
| Overhead works | 1 | 3 | 4 |
| Substation works | 1 | 4 | 5 |
| Property works | - | 8 | 8 |
| Vegetation management | - | 3 | 3 |
| Livening agent | 1 | 6 | 7 |
| Design | 1 | 6 | 7 |

In FY25:

Our procurement method is to source tenders from approved service providers for virtually all works based on the table below. In FY25 we called for awarded tenders for **128 projects totalling \$35.41m (FY24: 116 projects totalling \$29m)**. Of these, **70** were awarded to Connetics totaling **\$17.26m (FY24: 50, totalling \$13m)**.

Procurement of Works:

| For Works <50,000 | For Works \$50,000 - \$500,000 | For Works >\$500,000 |
|---|--|--|
| <ul style="list-style-type: none"> • If more than one price is sought, the lowest price accepted will not require further analysis. • Where T&M is ordered, <ul style="list-style-type: none"> ○ An estimate shall be recorded by considering an individual’s experience in these works. ○ When an invoice is received, the person responsible shall assess it against the estimate and will only approve in full where they believe that it is representative of good value. Approval will be evidence of the experienced individuals use of good judgement | <ul style="list-style-type: none"> • Preference will be given to tendering. • Where a tender is called, the price accepted shall be after analysis of fair value. Acceptance of the price will represent this analysis having occurred. • Where T&M is used, <ul style="list-style-type: none"> ○ An estimate shall be recorded by considering an individual’s experience in these works. A document shall record considerations in the estimate. ○ When an invoice is received, the approver shall compare this to the estimate stored and if necessary, any comparable works. A post invoice justification shall be created to record any difference and reasoning. The approval of the invoice shall deem acceptance by the experienced individual. | <ul style="list-style-type: none"> • Where there is more than one service provider capable of providing the works, then a tender shall be called. <ul style="list-style-type: none"> ○ When the tender is received, a fully documented approval shall be made. This will include what was the budget, scope and what was asked for. It will compare any relevant recent works and record any accepted differences. It will consider any project risks and opportunities. ○ The document set shall also include all tender clarifications as these are justifications. ○ Only once this is complete will an award be made. |

- T &M = time and materials

We evaluated the projects sole tendered to Connetics based on either schedule of rates or previous jobs to ensure pricing was at arms-length. We also sole tender to other approved service providers.

For works with an estimated cost below \$50k, a job manager will seek quoted prices from approved service providers or sole-source from a service provider, either on a quoted or time and materials basis.

Orion provides the PMO a cost estimate for a work package (Includes, scope and designs), should the tendered price be below the estimate the PMO will provide a recommendation to award. If the tendered price is above the estimate, then further analysis on the price is required which may result in escalation and further approval to proceed.

5. Example of procurement policy in practice

In some cases, it is not practical to establish multiple competing tenders given the size of our market and the limited range of participants. For example, we have negotiated emergency works contracts with several providers, including Connetics, and we have had these independently assessed. Such contracts rely on a schedule of rates and our job managers assess the reasonableness of the time and materials used in completing tasks undertaken by our service providers. We have also had independent reviews completed to ensure that other contracts – such as the cable management agreement we have with Connetics – are consistent with an arms-length approach.

For Network tendering in FY24/25 construction works were procured through the PMO utilising various procurement methods; including, competitive tender, sole source, yours to lose and time and materials utilising contract rates.

| Procurement Method | Contract No/ES Number: | Contract Name | Procured By | Awarded SDP |
|----------------------|------------------------|---|--|-------------------|
| Yours to Lose | 2022/080E (518388) | Zone Substation Maintenance FY25 | Connetics PMO | Connetics |
| Collaborative Tender | 2022/080E (518385) | Distribution Substation Inspections (MDI Rounds) FY25 | Connetics PMO | Connetics /Ventia |
| Yours to Lose | 2022/080E (519137) | 11kV and 400V Switchgear Replacement FY25/1 | Connetics PMO | Connetics |
| Competitive Tender | 2022/080E (527931) | Fendalton Ripple and Local RMU Upgrade FY25 | Connetics PMO | Connetics |
| Material Purchase | 2023/075E | Supply of Magnefix | Orion | Connetics |
| Material Purchase | 2023/075E | Network Stores Management -Supply cable | Orion | Connetics |
| Time and Materials | 2022/080E (533210) | ORANGE TAGGED POLE - CF022 Main West Coast Rd | Orion / PMO – Issued on time and material basis | Connetics |
| Time and Materials | 2024/070E (155489R) | Service changeovers for Chorus Pole Replacements | Connetics PMO – Issued as Time and Materials | Connetics |
| Time and Materials | 2024/070E (502393J) | Overhead Line Structures Inspections Stage A FY26 sub-V | Orion / Connetics PMO – Issued as Time and Materials | Connetics |
| Time and Materials | 2024/070E (533381) | Low Voltage O/H Line Retightening Christchurch Urban area 9 - Package 6 | Orion / Connetics PMO – Issued as Time and Materials | Connetics |
| Competitive Tender | 2022/080E (518182) | Pole Replacement Package 18 - FY25 | Connetics PMO | Connetics |
| Yours to Lose | 2022/080E (518548) | Pole Replacement, Pack 06 - FY25 | Connetics PMO | Connetics |
| Yours to Lose | 2022/080E (455736E) | Distribution Substation Maintenance - LBS's | Connetics PMO | Connetics |
| Yours to Lose | 2022/080E (512557) | Pole Replacement, Package 14 - FY25 | Connetics PMO | Connetics |

| | | | | |
|----------------------------------|------------------------|---|--|-----------|
| Yours to Lose | 2022/080E (466321D) | City to Sea OH Removal & LV Works FY25 | Connetics PMO (3rd Party - CCC) | Connetics |
| Price Request (Yours to Lose) | 2022/080E (532492) | Rolleston ZS - GFN Removal | Connetics PMO | Connetics |
| Competitive Tender | 2022/080E (511126) | WP23/25 Supply Fuse Relocation Project | Connetics PMO | Connetics |
| Time and Materials | INCD-692-Q | Cnr West Coast Rd and Broken River Rd - Cave Stream Carpark, Broken River (Emergency Works) | Orion / Connetics PMO – Issued as Time and Materials | Connetics |

6. Representative transactions and testing of those transactions

As noted above, we test the basis of all our transactions regularly and do not differentiate between our related and unrelated parties. Our experienced teams assess the reasonableness of prices received from all of our service providers. We:

- continually test our significant transactions using management’s judgement and by comparing with recent similar works
- make assessments of untendered minor works by assessing the reasonableness of the quoted price or estimate
- have engaged PwC to assess the reasonableness of the schedules of rates negotiated with Connetics and with other unrelated service providers.

7. Policies or procedures that require or have the effect of requiring purchase

As discussed in section 3 above, Orion requires that all distribution cable to be installed on our network is sourced from Connetics. This requirement ensures that cable installed meets certain technical specifications and quality standards, so that the cable lasts for the design life of the asset. Orion engineers form part of the selection panel when choosing suppliers to provide cable. Connetics’ supply group sells cable to Connetics’ contracting group on an identical basis to all other service providers. Orion also works with Connetics to ensure cable stocks on hand are sufficient for Orion projects given often substantial lead times.

An exception to the above, Orion also tenders 66kV sub-transmission cables due to project warrantees and long lead times.

Other than this arrangement, we have no policies or procedures that have the effect of requiring purchase from our related parties. Customers who require a new connection can choose a provider from a schedule of service providers who are approved to operate on Orion’s network. Developers, including subdividers, can also choose from a range of service providers, and Orion will connect the assets provided that the assets meet Orion’s technical specifications.

8. Map of anticipated expenditure and network constraints

These are attached as an appendix to this document. Region A is primarily Orion's urban network and region B the rural network. Orion will generally tender this work with approved service providers as for all its major projects.

Connetics will generally be an approved tenderer for many of these projects, but the tender process will determine the successful service provider. In some projects and programmes – for example, vegetation and property management – Connetics does not take part in the tender rounds. As noted in section 7, it is likely that for some years Orion will require that cable to be used in the projects is sourced from Connetics.

IDD clauses 2.3.13 (3) and (4) require Orion to disclose where projects address possible future network equipment constraints and their location, where the response to the constraints would involve one of the ten largest opex or capex projects in the planning period. Notation on the map identifies the major reason for the each of our identified projects. In summary:

- in Region A, our projects will:
 - add capacity in northern Christchurch to address constraints
 - improve security of supply in northern and eastern Christchurch
 - improve resilience as we replace older 66kV oil-filled cables
- in Region B, our projects will address the ongoing load growth in the Rolleston and Dunsandel areas following the establishment of a new point of supply at Norwood and extensive associated works.

Refer to section 6 of our 2024 Asset Management Plan for further information.

9. Full disclosure of procurement policy

IDD clause 2.3.11 requires Orion to disclose to the Commission:

- its current policy in respect of the procurement of assets or goods or services from any related party;
or
- alternative documentation which is equivalent to a procurement policy in respect of the procurement of assets or goods or services from any related party.

Our procurement policies make no distinction between related and unrelated parties.

We are currently updating our procurement documentation and copies of the policies which applied during the year and our overall framework are attached. We have also attached additional policies and procedural documents which provide more information about our procurement culture and environment.

Attached are our:

- procurement policy
- delegations of authority policy
- reporting serious wrongdoing (whistleblower) policy
- conflict of interest policy
- fraud and theft policy (updated 20 June 2024)
- Matatika – code of ethics
- environmental policy
- procurement manual
- sensitive expenditure policy (updated 20 June 2024)

We consider that these policies and procedures contain Orion intellectual property and ask that the Commerce Commission treats this as confidential and does not release this information to any other party.

Orion New Zealand Limited

Maps of anticipated expenditure and network constraints

for the ten year period beginning 1 April 2024

Region A – urban network

Region B – rural network

Key:

Existing

| | |
|---|----------------------------|
|  | Transpower GXP |
|  | Orion 66kV ZS |
|  | Orion 33kV ZS |
|  | Transpower line |
|  | Orion 66kV line |
|  | Orion 33kV line |
|  | Orion 66kV cable |
|  | Orion 66kV SCOF cable |
|  | Orion 33kV cable |
|  | No. of ccts if more than 1 |

FYxx – xxx Financial year – Project No.

Note: Voltages shown are circuit/construction voltages

2025 AMP top Region A Capex and Opex programmes

Key:

-  Transpower GXP
-  Orion 66kV ZS
-  Orion 33kV ZS
-  Transpower line
-  Orion 66kV line
-  Orion 33kV line
-  No. of circuits if more than 1

Note: Voltages shown are circuit/construction voltages

Network wide Capex programmes:

Consumer connections – (FY26-35) \$294.4M

This expenditure covers the expenditure associated with connecting new and upgrading consumer connections across the Region A and B areas

11kV and LV Minor Works – (FY26-35) \$180.5M

This expenditure covers reconfiguration and reinforcement of the 11kV and LV distribution networks across the Region A and B areas for forecast constraint triggers due to growth and reactive issues

Asset replacement and renewal – (FY26-35)

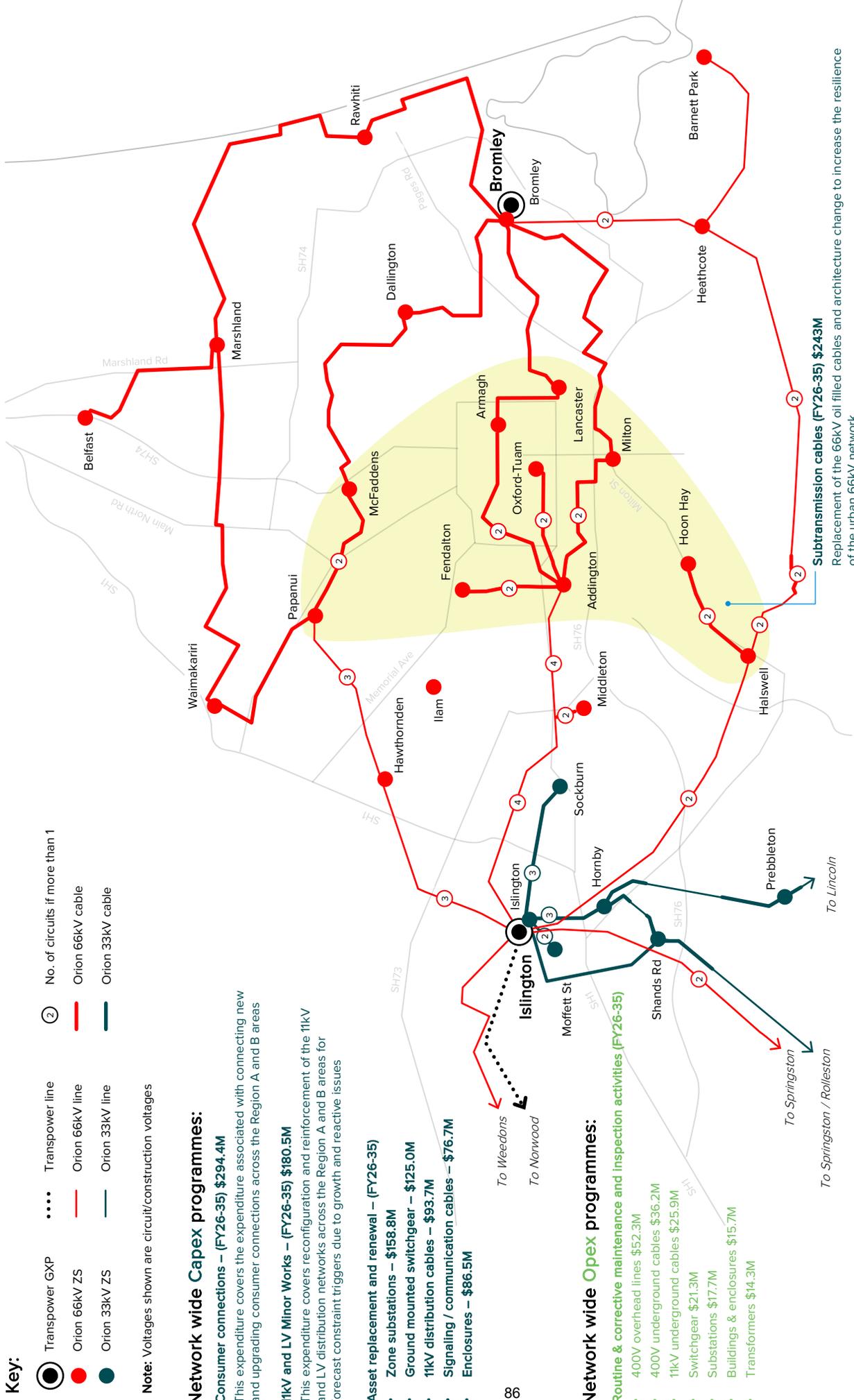
- Zone substations – \$158.8M
- Ground mounted switchgear – \$125.0M
- 11kV distribution cables – \$93.7M
- Signaling / communication cables – \$76.7M
- Enclosures – \$86.5M

88

Network wide Opex programmes:

Routine & corrective maintenance and inspection activities (FY26-35)

- 400V overhead lines \$52.3M
- 400V underground cables \$36.2M
- 11kV underground cables \$25.9M
- Switchgear \$21.3M
- Substations \$17.7M
- Buildings & enclosures \$15.7M
- Transformers \$14.3M



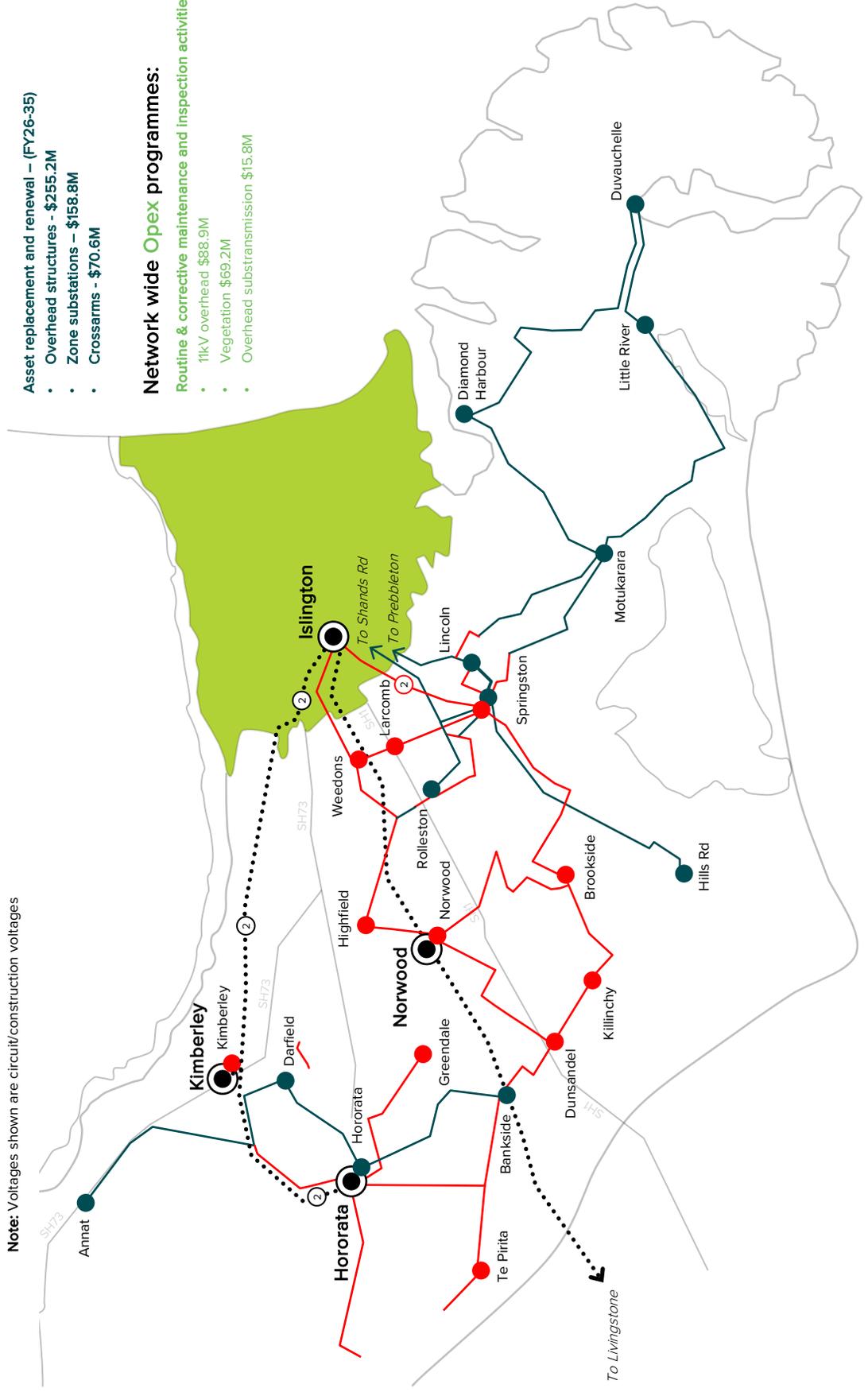
Subtransmission cables (FY26-35) \$243M
Replacement of the 66kV oil filled cables and architecture change to increase the resilience of the urban 66kV network

2025 AMP top Region B Capex and Opex programmes

Key:

-  Transpower GXP
-  Orion 66kV ZS
-  Orion 33kV ZS
-  Region A
-  Transpower GXP
-  Orion 66kV line
-  Orion 33kV line
-  No. of circuits if more than 1
-  Orion 66kV cable
-  Orion 33kV cable

Note: Voltages shown are circuit/construction voltages



Network wide Capex programmes:

Consumer connections – (FY26-35) \$294.4M

This expenditure covers the expenditure associated with connecting new and upgrading consumer connections across the Region A and B areas

11kV and LV Minor Works – (FY26-35) \$180.5M

This expenditure covers reconfiguration and reinforcement of the 11kV and LV distribution networks across the Region A and B areas for forecast constraint triggers due to growth and reactive issues

Asset replacement and renewal – (FY26-35)

- Overhead structures - \$255.2M
- Zone substations – \$158.8M
- Crossarms - \$70.6M

Network wide Opex programmes:

Routine & corrective maintenance and inspection activities (FY26-35)

- 11kV overhead \$88.9M
- Vegetation \$69.2M
- Overhead substansmission \$15.8M

Certification for year-end disclosures

We, Paul Jason Munro and Michael Earl Sang, being directors of Orion New Zealand Limited certify that, having made all reasonable enquiry, to the best of our knowledge-

- a) the information prepared for the purposes of clauses 2.3.1, 2.3.2, 2.3.8 - 2.3.12, 2.4.21, 2.4.22, 2.5.1(1)(a)-(f), 2.5.2, 2.5.2A, and 2.7.1 of the Electricity Distribution Information Disclosure Determination 2012 in all material respects complies with that determination; and
- b) the historical information used in the preparation of Schedules 8, 9a, 9b, 9c, 9d, 9e, 10, 10a and 14 has been properly extracted from Orion New Zealand Limited's accounting and other records sourced from its financial and non-financial systems, and that sufficient appropriate records have been retained.
- c) In respect of information concerning assets, costs and revenues valued or disclosed in accordance with clause 2.3.6 of the Electricity Distribution Information Disclosure Determination 2012 and clauses 2.2.11(1)(g) and 2.2.11(5) of the Electricity Distribution Services Input Methodologies Determination 2012, we are satisfied that-
 - i. the costs and values of assets or goods or services acquired from a related party comply, in all material respects, with clauses 2.3.6(1) and 2.3.6(3) of the Electricity Distribution Information Disclosure Determination 2012 and clauses 2.2.11(1)(g) and 2.2.11(5)(a)-2.2.11(5)(b) of the Electricity Distribution Services Input Methodologies Determination 2012; and
 - ii. the value of assets or goods or services sold or supplied to a related party comply, in all material respects, with clause 2.3.6(2) of the Electricity Distribution Information Disclosure Determination 2012.



Paul Jason Munro
Director



Michael Earl Sang
Director

Independent Assurance Report

To the directors of Orion New Zealand Limited and to the Commerce Commission

On the disclosure information for the disclosure year ended 31 March 2025 as required by the Electricity Distribution Information Disclosure (Amendments Related to IM Review 2023) Amendment Determination 2024 [2024] NZCC 31

Orion New Zealand Limited (the company) is required to disclose certain information under the Electricity Distribution Information Disclosure (Amendments related to IM Review 2023) Amendment Determination 2024 [2024] NZCC 31 (the Determination) and to procure an assurance report by an independent auditor in terms of section 2.8.1 of the Determination.

The Auditor-General is the auditor of the company.

The Auditor-General has appointed me, Dereck Ollsson, using the staff and resources of Audit New Zealand, to undertake a reasonable assurance engagement, on his behalf, on whether the information prepared by the company for the disclosure year ended 31 March 2025 (the Disclosure Information) complies, in all material respects, with the Determination.

The Disclosure Information that falls within the scope of the assurance engagement are:

- Schedules 1 to 4 (excluding 3a), 5a to 5h, 6a and 6b, 7, 10 (limited to the SAIDI and SAIFI information) and 14 (limited to the explanatory notes in boxes 1 to 11) of the Determination.
- Clause 2.3.6 of the Determination and clauses 2.2.11(1)(g) and 2.2.11(5) of the Electricity Distribution Services Input Methodologies Determination 2012 (consolidated 23 April 2024) (the IM Determination), in respect of the basis for valuation of related party transactions (the Related Party Transaction Information).

Opinion

In our opinion, in all material respects:

- as far as appears from an examination, proper records to enable the complete and accurate compilation of the Disclosure Information have been kept by the company;
- as far as appears from an examination, the information used in the preparation of the Disclosure Information has been properly extracted from the company's accounting and other records, sourced from the company's financial and non-financial systems;

- the Disclosure Information complies, in all material respects, with the Determination; and
- the basis for valuation of related party transactions complies with the Determination and the IM Determination.

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.

Key assurance matters

Key assurance matters are those matters that, in our professional judgement, required significant attention when carrying out the assurance engagement during the current disclosure year. These matters were addressed in the context of our compliance engagement, and in forming our opinion. We do not provide a separate opinion on these matters.

| Key assurance matters | How our procedures addressed the key assurance matters |
|--|---|
| <p>Accuracy of the number and duration of electricity outages</p> <p>The company has automated systems to identify outages and to record the duration of outages. This outage information is used to report the company’s Report on Network Reliability in schedule 10. If this information is inaccurate, then the measures of the reliability of the network could be materially misstated.</p> <p>This is a key assurance matter because information on the frequency and duration of outages is an important measure of the reliability of electricity supply. Relatively small inaccuracies can have a significant impact on the reliability thresholds against which the company’s performance is assessed.</p> | <p>We have obtained an understanding of the company’s system to record electricity outages, and their duration. This included review of the company’s definition of interruptions, planned interruptions and major event days.</p> <p>Our procedures to assess the adequacy of the company’s methods to identify and record electricity outages and their duration included:</p> <ul style="list-style-type: none"> • review and testing of the overall control environment; • performing an assessment of the reliability of the automated processes to record the details of interruptions to supply; • obtaining internal and external information on interruptions to supply to gain assurance that interruptions to supply were recorded. Internal and external information sources included works orders for contractors, media reports and Board minutes; |

| Key assurance matters | How our procedures addressed the key assurance matters |
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| | <ul style="list-style-type: none"> • confirming the interruptions to supply information used in the SAIDI and SAIFI calculations was appropriately extracted from the automated system; • testing a sample of interruptions to supply to source records to conclude on their accuracy of calculation, and the appropriateness of the categorisation of the cause of the interruption and whether it was planned or unplanned, and that the cause of the interruptions is correctly categorised; • checking the SAIDI and SAIFI ratios were correctly calculated in accordance with the Determination. • obtaining explanations for all significant variances to forecast; and • testing the accuracy of the number of connections to the Electricity Authority's register. <p>Having carried out these procedures and assessed the likelihood of reported electricity outages and their duration being materially misstated in the Disclosure Information, we have no matters to report.</p> |
| <p>Valuation of related-party transactions at arm's-length</p> <p>The Determination and the IM Determination place a requirement on the company to value related-party procurement transactions at a value not greater than arm's-length. In other words, the value at which a transaction, with the same terms and conditions, would be entered into between a willing seller and a willing buyer who are unrelated and who are acting independently of each other and pursuing their own best interests.</p> <p>In the absence of an active market for related-party transactions, assignment of an objective arm's-length value to a related-party transaction is difficult.</p> <p>This is a key assurance matter because the requirement involves considerable judgement by company personnel. In turn, verification of the appropriate assignment of an objective arm's-length valuation to related-party</p> | <p>We have obtained an understanding of the company's approach to identifying and valuing related-party transactions at a value not greater than arm's-length in accordance with the Determination and the IM Determination. We confirmed the approach used is in accordance with the Determination and the IM Determination.</p> <p>The procedures we have carried out to satisfy ourselves that related-party transactions are appropriately valued at arm's-length included:</p> <ul style="list-style-type: none"> • testing the completeness of the related-parties identified through review of minutes, review of Companies Office records, and related-parties identified through detailed testing of transactions and balances in the annual financial statements audit; • reviewing the appropriateness of procurement policies, especially with related parties, for the different categories of procurement transactions; • testing samples of transactions with related parties, for the different categories of procurement, for compliance with policies. This included reviewing the |

| Key assurance matters | How our procedures addressed the key assurance matters |
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| <p>transactions, requires the exercise of significant professional judgement by the auditor.</p> | <p>internal pricing estimates used as a basis of determining whether sole tender/quote jobs awarded were at a value not greater than arm's length, by ensuring they were derived from previously confirmed arm's length transactions or to other appropriate reliable evidence;</p> <ul style="list-style-type: none"> • a comparison of sales transactions for undergrounding of overhead lines against the depreciated fair value of the replaced assets; and • confirming the material accuracy of related party values disclosed, and compliance of their calculation with the Determination and the IM Determination. <p>The total variance between our estimates and the company's estimates of its arm's length values assigned to related party transactions was not considered to be material.</p> |

Directors' responsibilities

The directors of the company are responsible in accordance with the Determination for:

- the preparation of the Disclosure Information; and
- the Related Party Transaction Information.

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

Auditor's responsibilities

Our responsibilities in terms of clauses 2.8.1(1)(b)(vi) and (vii), 2.8.1(1)(c) and 2.8.1(1)(d) are to express an opinion on whether:

- as far as appears from an examination, the information used in the preparation of the audited Disclosure Information has been properly extracted from the company's accounting and other records, sourced from its financial and non-financial systems;
- as far as appears from an examination, proper records to enable the complete and accurate compilation of the audited Disclosure Information required by the Determination have been kept by the company and, if not, the records not so kept;

- the company complied, in all material respects, with the Determination in preparing the audited Disclosure Information; and
- the company's basis for valuation of related party transactions in the disclosure year has complied, in all material respects, with clause 2.3.6 of the Determination and clauses 2.2.11(1)(g) and 2.2.11(5) of the IM 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 the Disclosure Information (which includes the Related Party Transaction Information) required to be audited by the Determination.

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 the Determination may occur and not be detected.

A reasonable assurance engagement throughout the disclosure year does not provide assurance on whether compliance with 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 2.8.1(1)(a) 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) (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 Audit New Zealand and its employees may deal with the company and its subsidiaries 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 Default Price-Quality Path 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
Audit New Zealand
On behalf of the Auditor-General
Christchurch, New Zealand
14 August 2025