

Orion New Zealand Limited

Information for disclosure for the year ended 31 March 2021

Electricity distribution information disclosure determination 2012

Approved 31 August 2021

Company Name **Orion New Zealand Limited**

For Year Ended **31 March 2021**

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 the ID determination. This will include information disclosed in accordance with this and other schedules, and information disclosed under the other requirements of the determination.

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

sch ref

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	20,052	311	104,238	5,607	29,295
Network	9,188	142	47,760	2,569	13,422
Non-network	10,865	168	56,478	3,038	15,872
Expenditure on assets	25,113	389	130,544	7,022	36,688
Network	23,900	371	124,236	6,682	34,915
Non-network	1,213	19	6,308	339	1,773

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	70,623	1,095
Standard consumer line charge revenue	72,292	1,075
Non-standard consumer line charge revenue	31,664	281,812

23 1(iii): Service intensity measures

Demand density	54	Maximum coincident system demand per km of circuit length (for supply) (kW/km)
Volume density	280	Total energy delivered to ICPs per km of circuit length (for supply) (MWh/km)
Connection point density	18	Average number of ICPs per km of circuit length (for supply) (ICPs/km)
Energy intensity	15,504	Total energy delivered to ICPs per average number of ICPs (kWh/ICP)

30 1(iv): Composition of regulatory income

	(\$000)	% of revenue
Operational expenditure	65,160	27.93%
Pass-through and recoverable costs excluding financial incentives and wash-ups	67,906	29.10%
Total depreciation	43,559	18.67%
Total revaluations	17,435	7.47%
Regulatory tax allowance	17,414	7.46%
Regulatory profit/(loss) including financial incentives and wash-ups	56,001	24.00%
Total regulatory income	233,331	

40 1(v): Reliability

Interruption rate	13.54	Interruptions per 100 circuit km
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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 the 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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sch ref

	CY-2	CY-1	Current Year CY
	31 Mar 19	31 Mar 20	31 Mar 21
	%	%	%
2(i): Return on Investment			
ROI – comparable to a post tax WACC			
Reflecting all revenue earned	6.73%	7.27%	4.74%
Excluding revenue earned from financial incentives	6.42%	6.71%	4.53%
Excluding revenue earned from financial incentives and wash-ups	6.39%	6.71%	4.53%
Mid-point estimate of post tax WACC	4.75%	4.27%	3.72%
25th percentile estimate	4.07%	3.59%	3.04%
75th percentile estimate	5.43%	4.95%	4.40%
ROI – comparable to a vanilla WACC			
Reflecting all revenue earned	7.24%	7.70%	5.07%
Excluding revenue earned from financial incentives	6.93%	7.13%	4.86%
Excluding revenue earned from financial incentives and wash-ups	6.90%	7.13%	4.86%
WACC rate used to set regulatory price path	6.92%	6.92%	4.23%
Mid-point estimate of vanilla WACC	5.26%	4.69%	4.05%
25th percentile estimate	4.58%	4.01%	3.37%
75th percentile estimate	5.94%	5.37%	4.73%
2(ii): Information Supporting the ROI			
			(\$000)
Total opening RAB value	1,150,406		
plus Opening deferred tax	(48,583)		
Opening RIV		1,101,823	
Line charge revenue		229,490	
Expenses cash outflow	133,067		
add Assets commissioned	53,187		
less Asset disposals	449		
add Tax payments	10,514		
less Other regulated income	3,841		
Mid-year net cash outflows		192,478	
Term credit spread differential allowance		724	
Total closing RAB value	1,177,019		
less Adjustment resulting from asset allocation	(0)		
less Lost and found assets adjustment	-		
plus Closing deferred tax	(55,483)		
Closing RIV		1,121,536	
ROI – comparable to a vanilla WACC			5.07%
Leverage (%)			42%
Cost of debt assumption (%)			2.82%
Corporate tax rate (%)			28%
ROI – comparable to a post tax WACC			4.74%

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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

61								
62								
63	Opening RIV							N/A
64								
65								
66		Line charge revenue	Expenses cash outflow	Assets commissioned	Asset disposals	Other regulated income	Monthly net cash outflows	
67	April							-
68	May							-
69	June							-
70	July							-
71	August							-
72	September							-
73	October							-
74	November							-
75	December							-
76	January							-
77	February							-
78	March							-
79	Total	-	-	-	-	-	-	-
80								
81	Tax payments							N/A
82								
83	Term credit spread differential allowance							N/A
84								
85	Closing RIV							N/A
86								
87								
88	Monthly ROI – comparable to a vanilla WACC							N/A
89								
90	Monthly ROI – comparable to a post tax WACC							N/A
91								

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

92			
93			
94	Year-end ROI – comparable to a vanilla WACC		4.69%
95			
96	Year-end ROI – comparable to a post tax WACC		4.36%
97			

* 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

101				
102	Net recoverable costs allowed under incremental rolling incentive scheme			-
103	Purchased assets – avoided transmission charge			3,108
104	Energy efficiency and demand incentive allowance			
105	Quality incentive adjustment			-
106	Other financial incentives			-
107	Financial incentives			3,108
108				
109	Impact of financial incentives on ROI			0.21%
110				
111	Input methodology claw-back			-
112	CPP application recoverable costs			-
113	Catastrophic event allowance			-
114	Capex wash-up adjustment			-
115	Transmission asset wash-up adjustment			-
116	2013–15 NPV wash-up allowance			-
117	Reconsideration event allowance			-
118	Other wash-ups			-
119	Wash-up costs			-
120				
121	Impact of wash-up costs on ROI			-

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 the ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

sch ref		(\$000)
7	3(i): Regulatory Profit	
8	Income	
9	Line charge revenue	229,490
10	plus Gains / (losses) on asset disposals	(165)
11	plus Other regulated income (other than gains / (losses) on asset disposals)	4,006
12		
13	Total regulatory income	233,331
14	Expenses	
15	less Operational expenditure	65,160
16		
17	less Pass-through and recoverable costs excluding financial incentives and wash-ups	67,906
18		
19	Operating surplus / (deficit)	100,264
20		
21	less Total depreciation	43,559
22		
23	plus Total revaluations	17,435
24		
25	Regulatory profit / (loss) before tax	74,139
26		
27	less Term credit spread differential allowance	724
28		
29	less Regulatory tax allowance	17,414
30		
31	Regulatory profit/(loss) including financial incentives and wash-ups	56,001
32		
33	3(ii): Pass-through and Recoverable Costs excluding Financial Incentives and Wash-Ups	(\$000)
34	Pass through costs	
35	Rates	4,321
36	Commerce Act levies	357
37	Industry levies	769
38	CPP specified pass through costs	-
39	Recoverable costs excluding financial incentives and wash-ups	
40	Electricity lines service charge payable to Transpower	60,702
41	Transpower new investment contract charges	1,646
42	System operator services	-
43	Distributed generation allowance	-
44	Extended reserves allowance	-
45	Other recoverable costs excluding financial incentives and wash-ups	110
46	Pass-through and recoverable costs excluding financial incentives and wash-ups	67,906
47		

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For Year Ended **31 March 2021**

SCHEDULE 3: REPORT ON REGULATORY PROFIT

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sch ref

		(\$000)	
		CY-1	CY
		31 Mar 20	31 Mar 21
48	3(iii): Incremental Rolling Incentive Scheme		
49			
50			
51	Allowed controllable opex	-	64,154
52	Actual controllable opex	61,292	65,100
53			
54	Incremental change in year		-
55			
56		Previous years' incremental change	Previous years' incremental change adjusted for inflation
57	CY-5 31 Mar 16	2,425	(1,809)
58	CY-4 31 Mar 17	(235)	(252)
59	CY-3 31 Mar 18	1,600	1,691
60	CY-2 31 Mar 19	(4,614)	-
61	CY-1 31 Mar 20	-	(4,797)
62	Net incremental rolling incentive scheme		(5,168)
63			
64	Net recoverable costs allowed under incremental rolling incentive scheme		-
65	3(iv): Merger and Acquisition Expenditure		
70			(\$000)
66	Merger and acquisition expenditure		-
67			
68	<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>		
69	3(v): Other Disclosures		
70			(\$000)
71	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. EDBs 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 the ID determination, and so is subject to the assurance report required by section 2.8.

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	for year ended	31 Mar 17 (\$000)	31 Mar 18 (\$000)	31 Mar 19 (\$000)	31 Mar 20 (\$000)	31 Mar 21 (\$000)
4(i): Regulatory Asset Base Value (Rolled Forward)						
Total opening RAB value		986,595	1,004,182	1,051,194	1,088,531	1,150,406
less Total depreciation		37,063	38,762	40,616	43,007	43,559
plus Total revaluations		21,320	11,011	15,577	27,543	17,435
plus Assets commissioned		34,993	77,003	63,637	78,414	53,187
less Asset disposals		1,663	996	1,278	1,074	449
plus Lost and found assets adjustment		—	—	—	—	—
plus Adjustment resulting from asset allocation		—	(1,245)	117	(0)	(0)
Total closing RAB value		1,004,182	1,051,194	1,088,531	1,150,406	1,177,019

4(ii): Unallocated Regulatory Asset Base

	Unallocated RAB *	RAB
	(\$000)	(\$000)
Total opening RAB value	1,151,559	1,150,406
less Total depreciation	43,579	43,559
plus Total revaluations	17,452	17,435
plus Assets commissioned (other than below)	37,548	37,548
plus Assets acquired from a regulated supplier	—	—
plus Assets acquired from a related party	15,639	15,639
less Assets commissioned	53,230	53,187
less Asset disposals (other than below)	449	449
less Asset disposals to a regulated supplier	—	—
less Asset disposals to a related party	—	—
plus Lost and found assets adjustment	449	449
plus Adjustment resulting from asset allocation	—	—
Total closing RAB value	1,178,214	1,177,019

* 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.

Company Name **Orion New Zealand Limited**
 For Year Ended **31 March 2021**

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

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

CPI _t	1,068		
CPI _{t-4}	1,052		
Revaluation rate (%)	1.52%		
Total opening RAB value			
less Opening value of fully depreciated, disposed and lost assets			
Total opening RAB value subject to revaluation			
Total revaluations			

	Unallocated RAB *		RAB
	(\$'000)	(\$'000)	(\$'000)
	1,151,559	1,150,406	1,150,406
	-4,086	-4,086	-4,086
	1,147,473	1,146,320	1,146,320
			17,452
			17,435

4(iv): Roll Forward of Works Under Construction

Works under construction — preceding disclosure year			
plus Capital expenditure			
less Assets commissioned			
plus Adjustment resulting from asset allocation			
Works under construction - current disclosure year			
Highest rate of capitalised finance applied			

	Unallocated works under construction		Allocated works under construction
	(\$'000)	(\$'000)	(\$'000)
	35,339	35,339	35,339
	79,569	79,526	79,526
	53,230	53,187	53,187
	61,678	61,678	61,678
			Nil

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. EDBs 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 the ID determination), and so is subject to the assurance report required by section 2.8.

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4(v): Regulatory Depreciation

76	Depreciation - standard	39,095	39,095	
77	Depreciation - no standard life assets	4,483	4,464	
78	Depreciation - modified life assets	-	-	
79	Depreciation - alternative depreciation in accordance with CPP	-	-	
80	Total depreciation	43,579	43,559	

4(vi): Disclosure of Changes to Depreciation Profiles

(\$000 unless otherwise specified)

Asset or assets with changes to depreciation*	Reason for non-standard depreciation (text entry)	Depreciation charge for the period (RAB)	Closing RAB value under 'non-standard' depreciation	Closing RAB value under 'standard' depreciation
86	N/A			
87				
88				
89				
90				
91				
92				
93				
94				
95				

* Include additional rows if needed

4(vii): Disclosure by Asset Category

(\$000 unless otherwise specified)

	Subtransmission lines	Subtransmission cables	Zone substations	Distribution and LV lines	Distribution and LV cables	Distribution and transformers	Distribution switchgear	Other network assets	Non-network assets	Total
98	67,124	85,935	139,735	423,076	377,301	130,525	136,049	34,489	56,272	1,150,406
99	2,485	2,498	6,872	5,047	12,619	3,750	5,558	1,446	3,285	43,559
100	1,020	1,307	2,122	1,871	5,737	1,983	2,065	524	804	17,435
101	3,000	987	8,543	6,817	42,334	5,257	11,044	1,833	3,371	53,187
102	12		100			65	187		86	449
103										
104										
105										
106	68,647	85,731	143,428	126,716	382,754	133,951	143,414	35,401	56,977	1,177,019

Asset Life

109	Weighted average remaining asset life	35.4	41.0	31.9	32.0	38.0	34.2	30.9	27.4	27.1
110	Weighted average expected total asset life	45.8	57.9	44.8	47.4	58.1	45.1	41.1	35.2	31.6

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 the ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

			(\$000)
7	5a(i): Regulatory Tax Allowance		
8	Regulatory profit / (loss) before tax		74,139
9			
10	<i>plus</i> Income not included in regulatory profit / (loss) before tax but taxable	-	*
11	Expenditure or loss in regulatory profit / (loss) before tax but not deductible	230	*
12	Amortisation of initial differences in asset values	15,249	
13	Amortisation of revaluations	4,119	
14			19,599
15			
16	<i>less</i> Total revaluations	17,435	
17	Income included in regulatory profit / (loss) before tax but not taxable	413	*
18	Discretionary discounts and customer rebates	-	
19	Expenditure or loss deductible but not in regulatory profit / (loss) before tax	112	*
20	Notional deductible interest	13,584	
21			31,543
22			
23	Regulatory taxable income		62,194
24			
25	<i>less</i> Utilised tax losses	-	
26	Regulatory net taxable income		62,194
27			
28	Corporate tax rate (%)	28%	
29	Regulatory tax allowance		17,414

* 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)

36	Opening unamortised initial differences in asset values	342,808	
37	<i>less</i> Amortisation of initial differences in asset values	15,249	
38	<i>plus</i> Adjustment for unamortised initial differences in assets acquired	-	
39	<i>less</i> Adjustment for unamortised initial differences in assets disposed	571	
40	Closing unamortised initial differences in asset values		326,988
41			
42	Opening weighted average remaining useful life of relevant assets (years)		22
43			

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 the ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

44	5a(iv): Amortisation of Revaluations		(\$000)
45			
46	Opening sum of RAB values without revaluations	1,030,009	
47			
48	Adjusted depreciation	39,440	
49	Total depreciation	43,559	
50	Amortisation of revaluations		4,119
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	(48,583)	
61			
62	plus Tax effect of adjusted depreciation	11,043	
63			
64	less Tax effect of tax depreciation	11,708	
65			
66	plus Tax effect of other temporary differences*	(2,027)	
67			
68	less Tax effect of amortisation of initial differences in asset values	4,270	
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	(61)	
73			
74	plus Deferred tax cost allocation adjustment	0	
75			
76	Closing deferred tax		(55,483)
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		(\$000)
82			
83	Opening sum of regulatory tax asset values	465,570	
84	less Tax depreciation	41,813	
85	plus Regulatory tax asset value of assets commissioned	46,667	
86	less Regulatory tax asset value of asset disposals	106	
87	plus Lost and found assets adjustment	-	
88	plus Adjustment resulting from asset allocation	-	
89	plus Other adjustments to the RAB tax value	-	
90	Closing sum of regulatory tax asset values		470,318

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

sch ref

	(\$000)	(\$000)
5b(i): Summary—Related Party Transactions		
Total regulatory income		2,682
Market value of asset disposals		–
Service interruptions and emergencies	10,555	
Vegetation management	1,049	
Routine and corrective maintenance and inspection	4,648	
Asset replacement and renewal (opex)	730	
Network opex		16,982
Business support	2,469	
System operations and network support	56	
Operational expenditure		19,507
Consumer connection	4,584	
System growth	3,351	
Asset replacement and renewal (capex)	12,067	
Asset relocations	678	
Quality of supply	69	
Legislative and regulatory	–	
Other reliability, safety and environment	–	
Expenditure on non-network assets		38
Expenditure on assets		20,787
Cost of financing		–
Value of capital contributions		378
Value of vested assets		–
Capital Expenditure		20,409
Total expenditure		39,916
Other related party transactions		4,562

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 Limited	Service interruptions and emergencies	10,555
Connetics Limited	Vegetation management	–
Connetics Limited	Routine and corrective maintenance and inspection	4,619
Connetics Limited	Asset replacement and renewal (opex)	730
Connetics Limited	Business support	2,448
Connetics Limited	System operations and network support	56
Connetics Limited	Consumer connection	4,584
Connetics Limited	System growth	3,351
Connetics Limited	Asset replacement and renewal (capex)	12,056
Connetics Limited	Asset relocations	678
Connetics Limited	Quality of supply	69
Connetics Limited	Expenditure on non-network assets	38
Christchurch City Council	Asset replacement and renewal (capex)	11
Christchurch City Council	Asset relocations	–
Christchurch City Council	System growth	–
Christchurch City Council	Expenditure on non-network assets	–
Christchurch City Council	Routine and corrective maintenance and inspection	24
Christchurch City Council	System operations and network support	–
Christchurch City Council	Business support	21
Selwyn District Council	Routine and corrective maintenance and inspection	5
Selwyn District Council	Vegetation management	–
Selwyn District Council	Asset replacement and renewal (capex)	–
City Care Limited	Vegetation management	1,049
City Care Limited	System growth	–
City Care Limited	Asset replacement and renewal (capex)	–
City Care Limited	Routine and corrective maintenance and inspection	–
		–
Total value of related party transactions		40,294

* include additional rows if needed

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 the ID determination), and so is subject to the assurance report required by section 2.8.

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	12/9/2018	27/7/2018	10.0	BKBW + margin	45,000,000	45,000,000	168,750	(45,000)
US Private Placement (USPP) 2018 Series B - NZD \$95m	12/9/2018	27/7/2018	12.0	BKBW + margin	95,000,000	95,000,000	498,750	(110,833)
					140,000,000		667,500	(155,833)

** include additional rows if needed*

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

Gross term credit spread differential	511,667
Total book value of interest bearing debt	
Leverage	345,350,000
Average opening and closing RAB values	42%
Attribution Rate (%)	1,163,713
Term credit spread differential allowance	0%
	724

sch ref

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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 the ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

5d(i): Operating Cost Allocations

	Arm's length deduction	Value allocated (\$'000s)	OVABAA allocation increase (\$'000s)
		Electricity distribution services	Non-electricity distribution services
			Total
Service interruptions and emergencies			
Directly attributable		10,043	
Not directly attributable		–	–
Total attributable to regulated service		10,043	
Vegetation management			
Directly attributable		4,345	
Not directly attributable		–	–
Total attributable to regulated service		4,345	
Routine and corrective maintenance and inspection			
Directly attributable		13,230	
Not directly attributable		–	–
Total attributable to regulated service		13,230	
Asset replacement and renewal			
Directly attributable		2,238	
Not directly attributable		–	–
Total attributable to regulated service		2,238	
System operations and network support			
Directly attributable		20,204	
Not directly attributable		–	–
Total attributable to regulated service		20,204	
Business support			
Directly attributable		13,854	
Not directly attributable		1,247	356
Total attributable to regulated service		15,101	1,603
Operating costs directly attributable		63,913	
Operating costs not directly attributable		1,247	356
Operational expenditure		65,160	1,603
			–

Company Name
Orion New Zealand Limited
 For Year Ended
31 March 2021

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 the ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

5d(ii): Other Cost Allocations

Pass through and recoverable costs

Pass through costs

Directly attributable
 Not directly attributable

Total attributable to regulated service

Recoverable costs

Directly attributable
 Not directly attributable

Total attributable to regulated service

(\$000)

5,447
—
5,447

62,459
—
62,459

5d(iii): Changes in Cost Allocations* †

Change in cost allocation 1

Cost category
 Original allocator or line items
 New allocator or line items

(\$000)	
CY-1	Current Year (CY)
Original allocation	
New allocation	
Difference	—

Rationale for change

--

Change in cost allocation 2

Cost category
 Original allocator or line items
 New allocator or line items

(\$000)	
CY-1	Current Year (CY)
Original allocation	
New allocation	
Difference	—

Rationale for change

--

Change in cost allocation 3

Cost category
 Original allocator or line items
 New allocator or line items

(\$000)	
CY-1	Current Year (CY)
Original allocation	
New allocation	
Difference	—

Rationale for change

--

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

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 the 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		
Subtransmission lines		
Directly attributable		68,647
Not directly attributable		-
Total attributable to regulated service		68,647
Subtransmission cables		
Directly attributable		85,731
Not directly attributable		-
Total attributable to regulated service		85,731
Zone substations		
Directly attributable		143,428
Not directly attributable		-
Total attributable to regulated service		143,428
Distribution and LV lines		
Directly attributable		126,716
Not directly attributable		-
Total attributable to regulated service		126,716
Distribution and LV cables		
Directly attributable		382,754
Not directly attributable		-
Total attributable to regulated service		382,754
Distribution substations and transformers		
Directly attributable		133,951
Not directly attributable		-
Total attributable to regulated service		133,951
Distribution switchgear		
Directly attributable		143,414
Not directly attributable		-
Total attributable to regulated service		143,414
Other network assets		
Directly attributable		35,400
Not directly attributable		-
Total attributable to regulated service		35,400
Non-network assets		
Directly attributable		47,930
Not directly attributable		9,047
Total attributable to regulated service		56,978
Regulated service asset value directly attributable		1,167,971
Regulated service asset value not directly attributable		9,047
Total closing RAB value		1,177,019

5e(ii): Changes in Asset Allocations* †		(\$000)	
		CY-1	Current Year (CY)
Change in asset value allocation 1			
Asset category		Original allocation	
Original allocator or line items		New allocation	
New allocator or line items		Difference	
Rationale for change			
Change in asset value allocation 2			
Asset category		Original allocation	
Original allocator or line items		New allocation	
New allocator or line items		Difference	
Rationale for change			
Change in asset value allocation 3			
Asset category		Original allocation	
Original allocator or line items		New allocation	
New allocator or line items		Difference	
Rationale for change			

* 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 the 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		18,898
9	System growth		17,918
10	Asset replacement and renewal		33,503
11	Asset relocations		948
12	Reliability, safety and environment:		
13	Quality of supply	197	
14	Legislative and regulatory	-	
15	Other reliability, safety and environment	6,198	
16	Total reliability, safety and environment		6,394
17	Expenditure on network assets		77,661
18	Expenditure on non-network assets		3,943
19			
20	Expenditure on assets		81,604
21	plus Cost of financing		-
22	less Value of capital contributions		2,079
23	plus Value of vested assets		-
24			
25	Capital expenditure		79,526
26	6a(ii): Subcomponents of Expenditure on Assets (where known)		(\$000)
27	Energy efficiency and demand side management, reduction of energy losses		N/A
28	Overhead to underground conversion		-
29	Research and development		N/A
30	6a(iii): Consumer Connection		
31	<i>Consumer types defined by EDB*</i>	(\$000)	(\$000)
32	Subdivisions	4,359	
33	Large customers	2,187	
34	General connections	9,533	
35	Switchgear	553	
36	Transformers	2,266	
37	<i>* include additional rows if needed</i>		
38	Consumer connection expenditure		18,898
39			
40	less Capital contributions funding consumer connection expenditure	1,537	
41	Consumer connection less capital contributions		17,361
42	6a(iv): System Growth and Asset Replacement and Renewal		
43			Asset
44		System Growth	Replacement and
45		(\$000)	Renewal
46	Subtransmission	11,374	2,864
47	Zone substations	1,343	7,028
48	Distribution and LV lines	1,548	6,490
49	Distribution and LV cables	3,142	2,024
50	Distribution substations and transformers	-	1,554
51	Distribution switchgear	-	7,097
52	Other network assets	510	6,447
53	System growth and asset replacement and renewal expenditure	17,918	33,503
54	less Capital contributions funding system growth and asset replacement and renewal	-	-
55	System growth and asset replacement and renewal less capital contributions	17,918	33,503
56	6a(v): Asset Relocations		
57	<i>Project or programme*</i>	(\$000)	(\$000)
58	NZTA and others	343	
59	CERA/SCIRT/Otakaro (Rebuild)	16	
60	Selwyn District Council	272	
61	Christchurch City Council	255	
62	Others	62	
63	<i>* include additional rows if needed</i>		
64	All other projects or programmes - asset relocations		
65	Asset relocations expenditure		948
66	less Capital contributions funding asset relocations	542	
67	Asset relocations less capital contributions		406

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 the ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

69	6a(vi): Quality of Supply		
70	Project or programme*	(\$000)	(\$000)
71	Comms associated with Entec line switches	122	
72	Norwood 25 66kv	74	
73			
74			
75			
76	* include additional rows if needed		
77	All other projects programmes - quality of supply		
78	Quality of supply expenditure		197
79	less Capital contributions funding quality of supply		
80	Quality of supply less capital contributions		197
81	6a(vii): Legislative and Regulatory		
82	Project or programme*	(\$000)	(\$000)
83	No projects with this as the primary driver	-	
84			
85			
86			
87			
88	* include additional rows if needed		
89	All other projects or programmes - legislative and regulatory		
90	Legislative and regulatory expenditure		-
91	less Capital contributions funding legislative and regulatory		
92	Legislative and regulatory less capital contributions		-
93	6a(viii): Other Reliability, Safety and Environment		
94	Project or programme*	(\$000)	(\$000)
95	400V UG Supply Fuse Relocation Program	6,079	
96	LV Ties replacement with Krone	119	
97			
98			
99			
100	* include additional rows if needed		
101	All other projects or programmes - other reliability, safety and environment		
102	Other reliability, safety and environment expenditure		6,198
103	less Capital contributions funding other reliability, safety and environment		
104	Other reliability, safety and environment less capital contributions		6,198
105			
106	6a(ix): Non-Network Assets		
107	Routine expenditure		
108	Project or programme*	(\$000)	(\$000)
109	Vehicles and mobile plant	916	
110	Information solutions	2,542	
111	Sundry tools and equipment	211	
112	Sundry land and buildings	274	
113			
114	* include additional rows if needed		
115	All other projects or programmes - routine expenditure	-	
116	Routine expenditure		3,943
117	Atypical expenditure		
118	Project or programme*	(\$000)	(\$000)
119	N/A		
120			
121			
122			
123			
124	* include additional rows if needed		
125	All other projects or programmes - atypical expenditure		
126	Atypical expenditure		-
127			
128	Expenditure on non-network assets		3,943

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 the ID determination), and so is subject to the assurance report required by section 2.8.

sch ref

		(\$000)	(\$000)
7	6b(i): Operational Expenditure		
8	Service interruptions and emergencies	10,043	
9	Vegetation management	4,345	
10	Routine and corrective maintenance and inspection	13,230	
11	Asset replacement and renewal	2,238	
12	Network opex		29,855
13	System operations and network support	20,204	
14	Business support	15,101	
15	Non-network opex		35,305
16			
17	Operational expenditure		65,160
18	6b(ii): Subcomponents of Operational Expenditure (where known)		
19	Energy efficiency and demand side management, reduction of energy losses		-
20	Direct billing*		-
21	Research and development		-
22	Insurance		2,360
23	<i>* Direct billing expenditure by suppliers that directly bill the majority of their consumers</i>		

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 the 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

	Target (\$000) ¹	Actual (\$000)	% variance
7(i): Revenue			
Line charge revenue	229,343	229,490	0%
7(ii): Expenditure on Assets	Forecast (\$000) ²	Actual (\$000)	% variance
Consumer connection	9,635	18,898	96%
System growth	10,136	17,918	77%
Asset replacement and renewal	28,026	33,503	20%
Asset relocations	4,161	948	(77%)
Reliability, safety and environment:			
Quality of supply	5,646	197	(97%)
Legislative and regulatory	–	–	–
Other reliability, safety and environment	7,333	6,198	(15%)
Total reliability, safety and environment	12,979	6,394	(51%)
Expenditure on network assets	64,937	77,661	20%
Expenditure on non-network assets	6,955	3,943	(43%)
Expenditure on assets	71,892	81,604	14%
7(iii): Operational Expenditure			
Service interruptions and emergencies	7,922	10,043	27%
Vegetation management	4,000	4,345	9%
Routine and corrective maintenance and inspection	12,634	13,230	5%
Asset replacement and renewal	2,465	2,238	(9%)
Network opex	27,021	29,855	10%
System operations and network support	18,962	20,204	7%
Business support	17,573	15,101	(14%)
Non-network opex	36,535	35,305	(3%)
Operational expenditure	63,556	65,160	3%
7(iv): Subcomponents of Expenditure on Assets (where known)			
Energy efficiency and demand side management, reduction of energy losses	–	N/A	–
Overhead to underground conversion	4,161	–	(100%)
Research and development	–	N/A	–
7(v): Subcomponents of Operational Expenditure (where known)			
Energy efficiency and demand side management, reduction of energy losses	–	–	–
Direct billing	–	–	–
Research and development	–	–	–
Insurance	2,245	2,360	5%

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 EDB in its pricing schedules. Information is also required on the number of ICPS that are included in each consumer group or price category code, and the energy delivered to these ICPS.

See 9/7

8(i): Billed Quantities by Price Component

Consumer group name or price category code	Consumer type or type (residential, commercial, etc.)	Standard or non-standard consumer group (specify)	Average no. of ICPS in disclosure year	Energy delivered to ICPS in disclosure year (MWh)	Streetlighting/General Peak Charge (STFC)	Streetlighting/General Fixed Charge (GEFAC)	Streetlighting/General Peak Charge (GEPAC)	Streetlighting/General Volume (NOVMD)	Streetlighting/General Volume (NOVMD) Night and weekend	General Low Power Factor Charge (LOWPF)	Incapacity Capacity Charge (ICCAP)	Incapacity Connection Capacitance (ICPCF)	Incapacity Interim Release (ICIR)	Major customer Fixed Charge (MFCFC)
UG	Streetlighting	Standard	500											
GEN	Residential and commercial	Standard	207,493	2,303,406										
HR	Commercial irrigation	Standard	1,064											
MC	Large commercial and industrial	Standard	311	770,527										
CC	Large capacity	Non-standard	15	183,500										
		(Select one)												
		(Select one)												
		(Select one)												
		(Select one)												
		(Select one)												
		(Select one)												
		(Select one)												
Add extra rows for additional consumer groups or price category codes as necessary:														
		Standard consumer total	209,569	3,115,983										
		Non-standard consumer total	15	183,500										
		Total for all consumers	209,584	3,299,483										

Billed quantities by price component					Price component							Unit charging basis (eg. days, kW of demand, kWh of capacity, etc)		
Consumer group name or price category code	Consumer type or type (residential, commercial, etc.)	Standard or non-standard consumer group (specify)	Average no. of ICPS in disclosure year	Energy delivered to ICPS in disclosure year (MWh)	Streetlighting/General Fixed Charge (STFC)	Streetlighting/General Fixed Charge (GEFAC)	Streetlighting/General Peak Charge (GEPAC)	Streetlighting/General Volume (NOVMD)	Streetlighting/General Volume (NOVMD) Night and weekend	General Low Power Factor Charge (LOWPF)	Incapacity Capacity Charge (ICCAP)	Incapacity Connection Capacitance (ICPCF)	Incapacity Interim Release (ICIR)	Major customer Fixed Charge (MFCFC)
UG	Streetlighting	Standard	500		50,735	202,294	471,591	1,146,788,282	1,296,130,210		77,336	23,783	—	—
GEN	Residential and commercial	Standard	207,493	2,303,406										
HR	Commercial irrigation	Standard	1,064											
MC	Large commercial and industrial	Standard	311	770,527										
CC	Large capacity	Non-standard	15	183,500										
		(Select one)												
		(Select one)												
		(Select one)												
		(Select one)												
		(Select one)												
		(Select one)												
Add extra rows for additional consumer groups or price category codes as necessary:														
		Standard consumer total	209,569	3,115,983	50,735	202,294	471,591	1,146,788,282	1,296,130,210	—	77,336	23,783	—	—
		Non-standard consumer total	15	183,500										
		Total for all consumers	209,584	3,299,483	50,735	202,294	471,591	1,146,788,282	1,296,130,210	—	77,336	23,783	—	—

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

Consumer group name or price category code	Consumer type or type (residential, commercial, etc.)	Standard or non-standard consumer group (specify)	Total line charge revenue in disclosure year	Net of revenue discounts (if applicable)
UG	Streetlighting	Standard	51,897	(578)
GEN	Residential and commercial	Standard	\$13,285	\$49,152
HR	Commercial irrigation	Standard	\$4,320	\$906
MC	Large commercial and industrial	Standard	\$33,802	\$13,524
CC	Large capacity	Non-standard	\$1,237	\$2,058
		(Select one)		
		(Select one)		
		(Select one)		
		(Select one)		
		(Select one)		
Add extra rows for additional consumer groups or price category codes as necessary:				
		Standard consumer total	\$22,263	—
		Non-standard consumer total	\$4,227	—
		Total for all consumers	\$26,490	—

8(iii): Number of ICPS Directly Billed

Consumer group name or price category code	Consumer type or type (residential, commercial, etc.)	Standard or non-standard consumer group (specify)	Number of directly billed ICPS at year end	
UG	Streetlighting	Standard	33	
GEN	Residential and commercial	Standard		
HR	Commercial irrigation	Standard		
MC	Large commercial and industrial	Standard		
CC	Large capacity	Non-standard		
		(Select one)		
		(Select one)		
		(Select one)		
		(Select one)		
		(Select one)		
Add extra rows for additional consumer groups or price category codes as necessary:				
		Standard consumer total	33	
		Non-standard consumer total		
		Total for all consumers	33	

Major customer Additional feed (M/CDA)	Major customer Extra switches (E/SW)	Major customer 11kV Metering equipment (EQMT)	Major customer 11kV Undesignated cabling (EQUC)	Major customer 11kV Overhead lines (EQOH)	Major customer Transformer capacity (E/TFC)	Major customer Peak charge (MCCP)	Major customer Nominal maximum demand (including MCCP)	Major customer Metered maximum demand (including MCCP)	Large capacity maintenance & administration (dedicated assets)	Large capacity maintenance & administration (shared assets)	Large capacity Asset charge (dedicated assets)	Large capacity Asset charge (shared assets)	Large capacity Interconnection charge (winter)	Large capacity Interconnection charge (summer)	Connection charge	Customer investment contract charge	30 - 750 kW Control period export (EMCP)	30 - 750 kW Control period export (EMCP)	Monthly/invoice charge (INPK)	Follow to my notice (INFT)	Defaulted termination notice (INWDT)
Connection	Switches	Connection	km	km	kVA	kVA	kVA	kVA	kVA	kVA	kVA	kVA	kVA	kVA	kVA	kVA	kW	kVA	\$/kWh	\$/kWh	\$/kWh
98	107	41	7	3	334,033	112,343	262,484	236,792	35,000	31,720	35,000	31,720	6,172	19,642	19,642	16,000	450	117	438	9	2
99	107	41	7	3	334,033	112,343	262,484	236,792	35,000	31,720	35,000	31,720	6,172	19,642	19,642	16,000	450	117	438	9	2

Add extra columns
for additional
line quantities by
price
as necessary

Major customer Additional feed (M/CDA)	Major customer Extra switches (E/SW)	Major customer 11kV Metering equipment (EQMT)	Major customer 11kV Undesignated cabling (EQUC)	Major customer 11kV Overhead lines (EQOH)	Major customer Transformer capacity (E/TFC)	Major customer Peak charge (MCCP)	Major customer Nominal maximum demand (including MCCP)	Major customer Metered maximum demand (including MCCP)	Large capacity maintenance & administration (dedicated assets)	Large capacity maintenance & administration (shared assets)	Large capacity Asset charge (dedicated assets)	Large capacity Asset charge (shared assets)	Large capacity Interconnection charge (winter)	Large capacity Interconnection charge (summer)	Connection charge	Customer investment contract charge	30 - 750 kW Control period export (EMCP)	30 - 750 kW Control period export (EMCP)	Monthly/invoice charge (INPK)	Follow to my notice (INFT)	Defaulted termination notice (INWDT)
S/conn/day	S/switch/day	S/conn/day	S/km/day	S/km/day	\$/kVA/day	\$/MVA/day	\$/MVA/day	\$/MVA/day	\$/MVA/day	\$/MVA/day	\$/MVA/day	\$/MVA/day	\$/MVA/day	\$/MVA/day	\$/MVA/day	\$/MVA/day	\$/MVA/yr	\$/MVA/yr	\$/kWh	\$/kWh	\$/kWh
\$100	\$128	\$64	\$9	\$2	\$1,451	\$16,218	\$10,003	\$6,308	293	577	544	\$857	\$94	\$58	58	722	11	11	30	0	0
98	107	41	7	3	334,033	112,343	262,484	236,792	35,000	31,720	35,000	31,720	6,172	19,642	19,642	16,000	450	117	438	9	2
99	107	41	7	3	334,033	112,343	262,484	236,792	35,000	31,720	35,000	31,720	6,172	19,642	19,642	16,000	450	117	438	9	2

Add extra columns
for additional
line quantities by
price
as necessary

Company Name	Orion New Zealand Limited
For Year Ended	31 March 2021
Network / Sub-network Name	Entire network

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

sch ref	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.	28,721	28,487	(234)	4
9	All	Overhead Line	Wood poles	No.	59,961	59,740	(221)	4
10	All	Overhead Line	Other pole types	No.	–	–	–	N/A
11	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	509	506	(3)	4
12	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	–	–	–	N/A
13	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	86	87	1	4
14	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	40	40	(0)	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	1	2	1	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.	80	78	(2)	4
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.	113	113	–	4
26	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	–	–	–	–
27	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	293	332	39	4
28	HV	Zone substation switchgear	33kV RMU	No.	–	–	–	–
29	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	36	49	13	4
30	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	43	27	(16)	4
31	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	692	693	1	4
32	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	–	–	–	–
33	HV	Zone Substation Transformer	Zone Substation Transformers	No.	82	81	(1)	4
34	HV	Distribution Line	Distribution OH Open Wire Conductor	km	3,070	3,059	(11)	3
35	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	–	–	–	N/A
36	HV	Distribution Line	SWER conductor	km	86	86	–	3
37	HV	Distribution Cable	Distribution UG XLPE or PVC	km	1,200	1,235	35	4
38	HV	Distribution Cable	Distribution UG PILC	km	1,536	1,530	(6)	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.	62	60	(2)	4
41	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	813	771	(42)	4
42	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	9,254	9,239	(15)	4
43	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	3	–	(3)	4
44	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	4,694	4,762	68	4
45	HV	Distribution Transformer	Pole Mounted Transformer	No.	6,444	6,313	(131)	3
46	HV	Distribution Transformer	Ground Mounted Transformer	No.	5,308	5,553	245	3
47	HV	Distribution Transformer	Voltage regulators	No.	15	15	–	4
48	HV	Distribution Substations	Ground Mounted Substation Housing	No.	4,751	4,816	65	4
49	LV	LV Line	LV OH Conductor	km	1,754	1,748	(7)	2
50	LV	LV Cable	LV UG Cable	km	3,262	3,329	67	3
51	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	3,600	3,704	105	3
52	LV	Connections	OH/UG consumer service connections	No.	207,333	211,437	4,104	2
53	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	2,717	2,787	70	4
54	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot	452	535	83	4
55	All	Capacitor Banks	Capacitors including controls	No.	6	6	–	4
56	All	Load Control	Centralised plant	Lot	45	46	1	4
57	All	Load Control	Relays	No.	2,122	2,110	(12)	3
58	All	Civils	Cable Tunnels	km	1	1	–	4
59								

SCHEDULE 9b: ASSET AGE PROFILE

This schedule requires a summary of the age profile (based on year of installation) of the 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.

Volage	Asset category	Asset class	Number of assets at disclosure year end by installation date																		
			pre-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000	2001	2002	2003	2004	2005	2007	2008	2009	2010	2011	2012
9	All	Concrete poles / steel structure	9	708	1,054	7,978	7,194	7,947	2,956	1	1	1	38	16	24	11	4	2	7	4	13
10	All	Wood poles	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
11	All	Overhead Line	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
12	All	Overhead Line	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
13	All	Other pole types	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
14	HV	Subtransmission OH up to 66kV conductor	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
15	HV	Subtransmission OH 110kV+ conductor	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
16	HV	Subtransmission UG up to 66kV (XLP)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
17	HV	Subtransmission UG up to 66kV (gas pressurised)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
18	HV	Subtransmission UG up to 66kV (gas pressurised)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
19	HV	Subtransmission UG up to 66kV (PILC)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
20	HV	Subtransmission UG 110kV+ (XLP)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
21	HV	Subtransmission UG 110kV+ (Oil Pressurised)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
22	HV	Subtransmission UG 110kV+ (gas Pressurised)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
23	HV	Subtransmission submarine cable	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
24	HV	Zone substations up to 66kV	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
25	HV	Zone substations 110kV+	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
26	HV	50/66/110kV CB (Indoor)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
27	HV	50/66/110kV CB (Outdoor)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
28	HV	33kV Switch (Ground Mounted)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
29	HV	33kV Switch (Pole Mounted)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
30	HV	33kV RMU	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
31	HV	22/33kV CB (Indoor)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
32	HV	22/33kV CB (Outdoor)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
33	HV	3.3/6.6/11/22kV CB (ground mounted)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
34	HV	3.3/6.6/11/22kV CB (pole mounted)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
35	HV	Zone Substation Transformers	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
36	HV	Distribution OH Open Wire Conductor	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
37	HV	Distribution OH Aerial Cable Conductor	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
38	HV	SWER conductor	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
39	HV	Distribution UG XLP or PVC	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
40	HV	Distribution UG PILC	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
41	HV	Distribution Submarine Cable	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
42	HV	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionaliser	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
43	HV	3.3/6.6/11/22kV CB (Indoor)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
44	HV	3.3/6.6/11/22kV Switches and fuses (pole mounted)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
45	HV	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
46	HV	Pole Mounted Transformer	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
47	HV	Distribution Transformer	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
48	HV	Distribution Transformer	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
49	HV	Volume regulators	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
50	HV	Ground Mounted Substation Housing	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
51	LV	LV OH Conductor	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
52	LV	LV UG Cable	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
53	LV	LV Street lighting	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
54	LV	Connections	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
55	All	Protection	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
56	All	SCADA and communications	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
57	All	Capacitor Banks	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
58	All	Load Control	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
59	All	Load Control	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
60	All	Civils	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1

Company Name
 For Year Ended
 Network / Sub-network Name

Orion New Zealand Limited
 31 March 2021
 Entire network

2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	No. with age unknown	Items at end of year (penalty dates)	No. with default dates	Data accuracy (1-4)
12	--	8	1	--	4	4	--	--	--	--	--	--	--	28,887	7	3
742	809	806	880	1,026	1,006	1,305	1,092	950	--	--	--	--	--	59,740	--	N/A
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	N/A
1	0	3	4	0	16	--	--	--	--	--	--	--	--	506	--	4
2	5	18	21	1	3	3	1	0	--	--	--	--	--	87	--	N/A
0	--	--	--	0	--	--	--	--	--	--	--	--	--	40	--	4
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	N/A
--	--	--	--	--	--	--	--	--	--	--	--	--	--	2	--	4
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	N/A
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	N/A
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	N/A
--	--	--	--	--	--	--	--	--	--	--	--	--	--	78	--	4
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	N/A
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	N/A
3	--	8	4	4	--	4	--	--	--	--	--	--	--	113	--	4
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	N/A
14	7	11	--	12	--	8	--	6	--	--	--	--	--	332	16	3
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	N/A
--	--	--	--	--	--	--	11	--	--	--	--	--	--	49	--	4
--	--	--	--	--	--	--	--	7	--	--	--	--	--	27	--	4
20	2	25	17	1	3	--	26	--	--	--	--	--	--	693	--	4
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	N/A
2	2	3	1	--	1	2	--	--	--	--	--	--	--	81	--	4
88	76	46	67	20	57	34	29	19	--	--	--	--	--	3,059	--	3
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	N/A
--	--	--	--	--	--	--	--	--	--	--	--	--	--	86	--	3
56	53	73	96	58	70	65	43	36	--	--	--	--	--	1,235	--	4
0	0	0	0	0	1	1	0	0	--	--	--	--	--	1,530	--	4
2	--	--	4	5	7	6	--	--	--	--	--	--	--	--	--	N/A
7	--	4	--	--	--	--	--	--	--	--	--	--	--	60	--	4
160	142	268	194	139	178	134	99	104	--	--	--	--	--	771	--	4
--	--	--	--	--	--	--	--	--	--	--	--	--	--	9,239	--	4
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4
77	159	153	140	182	148	126	194	37	--	--	--	--	--	4,762	3	3
67	107	146	72	116	107	48	44	7	--	--	--	--	--	6,313	8	3
75	167	206	141	159	157	72	127	3	--	--	--	--	--	5,553	6	3
--	--	--	--	--	--	--	--	--	--	--	--	--	--	15	--	4
104	145	134	165	115	109	126	96	82	--	--	--	--	--	4,816	--	4
0	1	1	1	3	1	1	1	1	--	--	--	--	294	1,746	2	4
64	86	101	116	76	76	92	97	60	--	--	--	--	--	3,529	--	3
93	92	98	128	82	55	94	99	111	--	--	--	--	--	3,704	--	3
2,190	3,751	5,740	6,432	5,375	4,405	3,964	4,191	5,537	--	--	--	--	--	211,437	105,753	2
196	84	115	144	144	98	67	156	48	--	--	--	--	--	2,787	--	3
4	7	12	46	39	79	76	2	--	--	--	--	--	--	535	--	4
2	--	--	--	--	--	4	--	--	--	--	--	--	11	6	--	4
1	1	1	1	1	--	2	--	--	--	--	--	--	--	46	--	4
--	--	160	153	49	60	16	34	33	--	--	--	--	1,695	2,110	--	3
--	--	--	--	--	--	--	--	--	--	--	--	--	--	1	--	4

Company Name **Orion New Zealand Limited**

For Year Ended **31 March 2021**

Network / Sub-network Name **Entire network**

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

9				
10	Circuit length by operating voltage (at year end)	Overhead (km)	Underground (km)	Total circuit length (km)
11	> 66kV	–	–	–
12	50kV & 66kV	259	91	350
13	33kV	247	38	285
14	SWER (all SWER voltages)	86	2	88
15	22kV (other than SWER)	–	–	–
16	6.6kV to 11kV (inclusive—other than SWER)	3,059	2,763	5,822
17	Low voltage (< 1kV)	1,748	3,329	5,077
18	Total circuit length (for supply)	5,399	6,223	11,622
19				
20	Dedicated street lighting circuit length (km)	901	2,804	3,704
21	Circuit in sensitive areas (conservation areas, iwi territory etc) (km)			89
22				
23	Overhead circuit length by terrain (at year end)	(% of total)		
24	Urban	1,679		31%
25	Rural	3,156		58%
26	Remote only	143		3%
27	Rugged only	183		3%
28	Remote and rugged	238		4%
29	Unallocated overhead lines	–	–	–
30	Total overhead length	5,399		100%
31				
32		(% of total circuit length)		
33	Length of circuit within 10km of coastline or geothermal areas (where known)	1,902		16%
34		(% of total overhead length)		
35	Overhead circuit requiring vegetation management	5,399		100%

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

	Location *	Number of ICPs served	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			
26	* 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		

Company Name

Orion New Zealand Limited

For Year Ended

31 March 2021

Network / Sub-network Name

Entire network

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		
9	Number of ICPs connected in year by consumer type		
10	Consumer types defined by EDB*	Number of connections (ICPs)	
11	Streetlighting	27	
12	General	5,768	
13	Irrigation	4	
14	Major customer	8	
15	Large capacity	–	
16	* include additional rows if needed		
17	Connections total	5,807	
18			
19	Distributed generation		
20	Number of connections made in year	507	connections
21	Capacity of distributed generation installed in year	9.73	MVA
22	9e(ii): System Demand		
23			
24		Demand at time of maximum coincident demand (MW)	
25	Maximum coincident system demand		
26	GXP demand	623	
27	plus Distributed generation output at HV and above	2	
28	Maximum coincident system demand	625	
29	less Net transfers to (from) other EDBs at HV and above	0	
30	Demand on system for supply to consumers' connection points	625	
31	Electricity volumes carried	Energy (GWh)	
32	Electricity supplied from GXPs	3,372	
33	less Electricity exports to GXPs	0	
34	plus Electricity supplied from distributed generation	12	
35	less Net electricity supplied to (from) other EDBs	0	
36	Electricity entering system for supply to consumers' connection points	3,384	
37	less Total energy delivered to ICPs	3,249	
38	Electricity losses (loss ratio)	134	4.0%
39			
40	Load factor	0.62	
41	9e(iii): Transformer Capacity		
42		(MVA)	
43	Distribution transformer capacity (EDB owned)	2,224	
44	Distribution transformer capacity (Non-EDB owned, estimated)	220	
45	Total distribution transformer capacity	2,444	
46			
47	Zone substation transformer capacity	1,149	

Company Name	Orion New Zealand Limited
For Year Ended	31 March 2021
Network / Sub-network Name	Entire network

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 the 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)	-	
11	Class B (planned interruptions on the network)	671	
12	Class C (unplanned interruptions on the network)	897	
13	Class D (unplanned interruptions by Transpower)	3	
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)	3	
19	Total	1,574	
20			
21	Interruption restoration	≤3Hrs	>3hrs
22	Class C interruptions restored within	671	226
23			
24	SAIFI and SAIDI by class	SAIFI	SAIDI
25	Class A (planned interruptions by Transpower)	-	-
26	Class B (planned interruptions on the network)	0.09	27.7
27	Class C (unplanned interruptions on the network)	0.50	29.7
28	Class D (unplanned interruptions by Transpower)	0.00	0.2
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	0.0
34	Total	0.60	57.65
35			
36	Normalised SAIFI and SAIDI	Normalised SAIFI	Normalised SAIDI
37	Classes B & C (interruptions on the network)	0.60	57.4
38			

Company Name	Orion New Zealand Limited
For Year Ended	31 March 2021
Network / Sub-network Name	Entire network

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 the 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	0.7
Vegetation	0.07	4.8
Adverse weather	-	-
Adverse environment	-	-
Third party interference	0.04	3.1
Wildlife	0.04	2.3
Human error	0.05	1.0
Defective equipment	0.23	12.7
Cause unknown	0.08	5.1

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

Main equipment involved	SAIFI	SAIDI
Subtransmission lines	-	-
Subtransmission cables	-	-
Subtransmission other	-	-
Distribution lines (excluding LV)	0.06	16.6
Distribution cables (excluding LV)	0.00	0.4
Distribution other (excluding LV)	0.04	10.7

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

Main equipment involved	SAIFI	SAIDI
Subtransmission lines	0.05	2.5
Subtransmission cables	-	-
Subtransmission other	-	-
Distribution lines (excluding LV)	0.24	18.4
Distribution cables (excluding LV)	0.15	5.5
Distribution other (excluding LV)	0.07	3.2

10(v): Fault Rate

Main equipment involved	Number of Faults	Circuit length (km)	Fault rate (faults per 100km)
Subtransmission lines	8	506	1.58
Subtransmission cables	-	129	-
Subtransmission other	-	-	-
Distribution lines (excluding LV)	570	3,145	18.12
Distribution cables (excluding LV)	58	2,765	2.10
Distribution other (excluding LV)	129	-	-
Total	765		

Company

Orion New Zealand Limited

Year ended

31 March 2021

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

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)

Following the Canterbury earthquakes of 2010 and 2011, we applied for and were granted a Customised Price Path (CPP) for the period 1 April 2014 to 31 March 2019. The Commission used a WACC rate of 6.92% to set our CPP.

Our financial performance for the period of the CPP, as well as the three prior years, was significantly affected by the Canterbury quakes, including:

- higher capex
- higher opex
- lower network delivery revenues in FY11 to FY14 – due to quake effects on demand
- higher network delivery revenues in FY15 to FY19 – due to our CPP price resets
- quake insurance cash settlement revenues (affected disclosures in FY15, FY13 and FY12).

In FY20 the Commerce Commission allowed us to roll forward our CPP revenue allowance, less the claw-back of our earthquake recovery costs. This one-year extension brings us into line with other price and quality controlled EDBs for the start of the DPP period effective 1 April 2020. While the Commission didn't specifically allow a WACC for the extension, our prices were underpinned by the 6.92% carried-forward from our CPP. For this reason we have disclosed the WACC rate used to set our regulatory price path for FY20 at 6.92% in schedule 2.

The Commission determined price paths for price and quality controlled EDBs from 1 April 2020 using a WACC of 4.23%. The reduction in revenue due to the lower WACC has translated to a reduction in our profit and therefore in our ROI.

Our FY21 post-tax regulatory ROI was 4.7% (FY20: 7.3%; FY19: 6.7%). FY21's ROI includes a 1.5% CPI movement (FY20: 2.5%).

No items were reclassified in FY21 or FY20.

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):

	FY21 \$m
Rental revenue and recovery of outgoings	2.0
Recoveries from third parties who cause to damage to our network	1.0
Other	1.0
Total	<u>4.0</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:

	FY21 \$m	FY20 \$m	FY19 \$m	FY18 \$m	FY17 \$m	FY16 \$m	FY15 \$m	FY14 \$m	FY13 \$m
Regulatory profit – as disclosed	56	81	74	72	78	63	81	51	49
Less quake insurance cash settlements	-	-	-	-	-	-	(24)	-	(2)
Less indexed asset revaluations	(17)	(28)	(16)	(11)	(21)	(5)	(1)	(13)	(7)
Add back loss on asset disposals	-	1	1	1	1	3	1	5	2
Add back identified quake related opex	-	-	-	-	-	-	-	-	-
Underlying regulatory profit	<u>39</u>	<u>54</u>	<u>59</u>	<u>62</u>	<u>58</u>	<u>61</u>	<u>57</u>	<u>43</u>	<u>42</u>

Our underlying profit dropped between FY19 and FY20 due to the removal of the claw-back of earthquake recovery costs from FY20’s revenue – refer also to box 1.

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 FY21, we estimate that we have charged customers \$2.18m above our MAR for FY21. This amount is still subject to wash-ups as improved information becomes available. We will offset the final amount plus interest when setting delivery prices for FY23.

No items were reclassified in FY20 or FY21.

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 FY21 our RAB value increased as follows:

	FY21 \$m
Opening RAB value	1,150
Add new assets commissioned	53
Add indexed asset revaluation (at CPI)	18
Less asset disposals at RAB value	-
Less depreciation and amortisation	(44)
Closing RAB value	<u>1,177</u>

Our \$53m of commissioned assets in FY21 is significantly lower than FY20 (\$78m). Our works under construction grew by \$28m during the year with a number of significant projects commenced, but not completed, during the year. Delays in the arrival of materials due to COVID-19 has contributed to this increase.

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

	FY21
	\$m
Taxable income that is not in regulatory profit before tax	-
Expenditure that is not deductible:	
Legal and entertainment expenses	0.2
	<hr/> 0.2
Income that is not taxable	
Tax capital gain on allocation of insurance proceeds	0.4
Deductible expenditure that is not in regulatory profit before tax:	
Costs to obtain land easements	0.1
	<hr/> 0.5

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

	FY21 \$m
Expenditure timing differences for tax deductibility	(0.2)
Insurance cash settlement proceeds – assessable for tax purposes	0.4
Finance lease payments – operating leases for tax purposes	(0.2)
Internal profits on capex – deductible for tax purposes	(0.5)
Capex – deductible for tax purposes	(1.5)
Net total	<hr style="width: 100%; border: 0.5px solid black;"/> <u>(2.0)</u> <hr style="width: 100%; border: 0.5px solid black;"/>

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.

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.

In FY21 Orion commenced some operations at a group level, in line with a new 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 25% as a general rule of the 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 and advisers. 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 (\$0.4m in FY21 out of total opex of \$66m) we do not consider it necessary to put more complex recording systems in place – consistent with the proxy approach.

No items were reclassified in FY20 or FY21.

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

During FY18 we re-allocated two groups of assets from electricity distribution services to non-electricity distribution services, and therefore excluded their values from our RAB.

Firstly, based on advice from PwC we assigned \$0.9m of land not currently in use at our Waterloo Rd depot to non-electricity distribution activities.

Secondly, based on the Commerce Commission's Open letter (dated 9 May 2018) we re-allocated the values of EV chargers (other than those at our head office site) to non-electricity distribution activities. We excluded FY18 expenditure related to EV chargers from EDB expenditure values. We submitted to the Commission that our expenditure to date has been immaterial (less than 0.1% of our RAB) and is intended to help us understand what impacts EVs will have on our network, as well as to "seed" and encourage the update of EVs. The Mar 17 value of EV chargers re-allocated to non-electricity distribution assets at the end of FY18 was \$0.3m. We also did not assign additional FY18 expenditure to RAB.

In FY19 we reassessed the value of EV chargers we removed in FY18, following our response to the Commission's 2018 technology-related s53ZD notice. Clarifying the boundary between the network assets and the charger/plinth assets has resulted in us reassigning \$0.1m of assets previously classified outside RAB as now being part of our RAB.

We made no further changes to asset allocation in FY20 or FY21.

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:

- \$78m (last year: \$64m) for network assets
- \$4m (last year: \$3m) for non-network assets.

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

Schedule 6a(iv) discloses \$18m of capex for system growth and \$34m for asset replacement and renewal. Our major projects and programmes in these areas which exceeded \$2m were

	System growth \$m	Replacement & renewal \$m
Replacement of distribution transformers		6
LV, 11kV and subtransmission conductor and poles		6
11kV network circuit breaker replacement		4
Supply fuse relocation		3
11kV switchgear replacement		3
LV switchgear replacement		2
Hawthornden zone substation	3	
Belfast zone substation	4	
Belfast to Marshland 66v cable	4	
Other projects and programmes	7	10
Total	18	34

No capex items were reclassified in FY21.

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 \$2.2m of FY21 maintenance opex as asset replacement and renewal:

	FY21
	\$m
Retightening and cross-arm and insulator work on 11kV overhead lines	1.7
66kV underground cable joint refurbishment	0.2
Other	0.3
	<hr/>
	2.2
	<hr/>

There were no material atypical items of expenditure in FY21.

No items were reclassified during FY21.

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 \$72m and actual capex at \$82m. The key offsetting reasons for this overspend of \$10m are:

	FY21 \$m
Asset relocations (customer-driven)	(3)
Belfast zone substation (deferred from FY20)	1
Hawthornden zone substation	1
Marshland zone substation (delayed from FY20)	1
Replacements	4
Connections and extensions (customer-driven)	9
Other (net)	(3)
Overspend relative to our AMP forecast	<u>10</u>

OPEX

Schedule 7(iii) discloses our AMP forecast opex of \$63.5m and actual opex of \$65.2m. This \$1.7m overspend is due to a \$2.8m overspend in network opex offset by a \$1.1m favourable variance in non-network opex.

The key reasons for these two variances are:

	FY21 \$m
Network opex	
Routine and corrective maintenance and inspection	0.6
Asset replacement and renewal opex	(0.2)
Service interruptions and emergencies	2.1
Vegetation management	0.3
<u>Overspend</u> relative to our AMP forecast	<u>2.8</u>

During FY21, after taking legal and regulatory advice, Orion made a payment to Connetics and another emergency works service provider to maintain emergency response capability during the COVID-19 lockdown period. These payments totalled \$1.4m.

	FY21 \$m
Non-network opex	
Salaries and wages	(1.1)
Community engagement, sponsorship and communications	0.8
Consultancy	0.6
Salaries and wages – increase in capitalised labour	0.7
Commercial and regulatory	0.4
Other	0.3
<u>Underspend</u> relative to our AMP forecast	1.1

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 FY21.

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

In order to compare revenue with target revenue (as disclosed in our “Methodology for deriving delivery prices” document) on a like-for-like basis, we have added-back irrigation rebates and export and generation credits (\$1.1m) to actual revenue and made some other minor adjustments to billed revenue.

The following table shows target and billed revenue after allowing for the adjustments detailed above:

	Target \$m	Actual \$m	Difference \$m
Distribution	163.7	165.0	1.3
Transmission	65.5	65.6	0.1
Delivery revenue	229.2	230.6	1.4

The main factor contributing to the difference between target and billed revenue was general connection (including streetlighting and irrigation connections) volume charges which were \$1.4m above target, as a result of our delivery volumes being 27 GWh higher than forecast.

As noted in box 2 above, 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 FY21, we estimate that we have charged customers \$2.18m above our MAR for FY21. This amount is still subject to wash-ups as improved information becomes available. We will offset the final amount plus interest when setting delivery prices for FY23.

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
- 10.0% 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. We have identified some immaterial errors in prior year disclosures – refer Schedule 15.

Company Name Orion New Zealand Limited

For Year Ended 31 March 2021

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 3(iii)

In our FY17 disclosures we identified an error with previously disclosed information.

In FY16, we disclosed \$2,425k in row 54 as the incremental change in FY16. This amount was the difference between our allowed controllable opex for FY16 (\$58,104k) and our actual controllable opex for FY16 (\$55,679k).

However, the incremental change for FY16 should have been calculated as:

$$\begin{aligned} & (\text{allowed opex FY16} - \text{actual opex FY16}) - (\text{allowed opex FY15} - \text{actual opex FY15}) \\ &= (\$58,104\text{k} - \$55,679\text{k}) - (\$54,909\text{k} - \$50,828\text{k}) \\ &= (\$1,656\text{k}). \end{aligned}$$

We have carried forward the incorrect amount of \$2,425k in our subsequent disclosures. This error has no impact on any other disclosed information.

However, the column *Previous years' incremental change adjusted for inflation* records the inflation-adjusted corrected value.

In preparing our FY21 disclosures we identified that we had transposed the value entered in actual controllable opex for FY20. The value was entered in our FY20 disclosures as \$61,929k but should have been \$61,292k – consistent with FY20's schedule 6b. We have corrected the value in FY21's disclosures. This error has no impact on any other disclosed information. Orion was not assigned an allowed controllable opex for FY20.

Schedule 5a(viii)

In our FY19 disclosures we identified two immaterial errors with our FY18 disclosures in Schedule 5a(viii), the regulatory tax roll-forward.

In FY18 we agreed with the IRD that we would capitalise \$2.6m of internal labour per annum from FY16 to FY19 inclusive. Our regulatory tax commissioned assets for FY18 were reduced by the reversal of the provision we included within our FY17 commissioned asset disclosure, but at the time our asset register report was run the

correct additions for FY16 and FY17 had not been included. This error understated our commissioned tax assets for FY18 by \$5.2m.

We hold some tax assets and asset offsets outside our asset register, in a schedule managed by our tax advisors. The tax depreciation impact of these adjustments was incorrectly added to tax depreciation rather than subtracted. This error overstated our tax depreciation by \$5.8m. This overstatement is partially offset by \$0.6m of tax depreciation on the assets described in the last paragraph, so the net overstatement of tax depreciation was \$5.2m.

The cumulative effect of both of these errors was that our FY18 closing regulatory tax asset value was understated by \$10.4m (2.5%). If corrected, tax depreciation, commissioned tax assets and closing tax asset values would have changed respectively as follows: 42,233 to 37,061; 62,189 to 67,402 and 400,020 to 410,406.

Tax depreciation expense from schedule 5a(viii) flows into schedule 5a(vi) – the calculation of deferred tax balance. If adjusted, schedule 5a(vi) row 64 (tax effect of tax depreciation) would have changed from 11,825 to 10,377 and closing deferred tax liability would change from 43,149 to 41,701. If this flowed through to the calculation of ROIs in schedule 2, our disclosed ROIs would have dropped by 0.01% - our ROI comparable to a post-tax WACC reflecting all revenue earned would have fallen from 6.83% to 6.82%.

As this impact is immaterial we adjusted these errors within our FY19 disclosures without adjusting opening balances. Note that these errors only affected our regulatory tax values, not our RAB values.

Schedule 5b (iii)

Our Other related party transactions disclosed in row 35 of schedule 5b are rates levied by our shareholders, as follows:

	\$000
Selwyn District Council	247
Christchurch City Council	<u>4,315</u>
Total	<u>4,562</u>

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 and the peak demand charges applied to general and streetlighting connections are calculated from total energy volumes injected into the network, measured at Transpower GXPs and other embedded generation points, less loss adjusted half-hourly metered major customer and large capacity connection volumes. As we cannot accurately apportion this volume between the general, streetlighting and irrigation connection categories we apply the same volume and peak demand prices.

As the general connection category represents 99% of the connections on our network, we have decided for disclosure reporting, for the reason explained above, to include all billed quantities and revenues associated with the general, streetlighting and irrigation volume and the general and streetlighting peak demand price components under the general connection category.

Schedule 9a and 9b

An error in a factor used in the calculation of our lengths of our low voltage cable network and streetlighting cable network resulted in a small understatement of the total length of these assets by 1.5% in our FY17 disclosures. This small variation partially offset the normal annual growth in these asset lengths. While it would be normal to expect to observe reductions in quantities of older assets in the age profile, in FY18, as a result of the correction of this factor, the age profile showed small increases in quantities for old assets in rows 52 and 53. We have not restated/corrected this information in our FY17 disclosures because the error is not material.

Schedule 9b

In FY17 we identified and disclosed an error with previously disclosed information. In FY15 and FY16 we had 111,581 and 111,569 consumer service connections respectively where we used default dates to develop our age profile. Due to transposition errors, we did not disclose these quantities in the default date column in schedule 9b in either year. We have not restated/corrected this information in our FY15 and FY16 disclosures because the error is not material.

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.

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

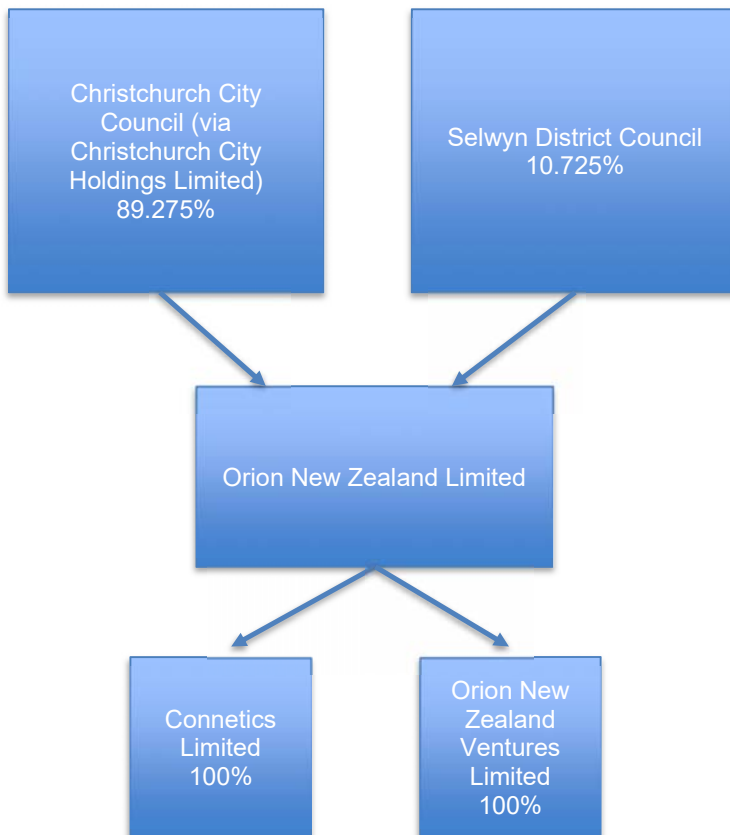
In FY21 the sum of Orion’s opex and capex exceeded the Commission’s \$20m de minimis threshold (IDD 2.3.9(1)), and our total related party expenditure exceeded 10% of our total opex and capex, so we are required to make these related party disclosures.

In FY21 we spent a total of:

	2021	2020
	\$m	\$m
Opex (from IDD schedule 6b(i), row 17)	65	61
Capex (from IDD schedule 6a(i), row 20)	80	68
Total expenditure	145	129

Orion’s expenditure with related parties in FY21, as disclosed in IDD schedule 5b, amounted to \$40m (FY20: \$35m), around 28% (FY20: 27%) of our overall capex and opex. This includes \$4m 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 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%)
- Red Bus Limited (CCHL 100%)
- EcoCentral Limited (CCHL 100%)
- Development Christchurch Limited (CCHL 100%)
- Vbase Ltd (CCC 100%)
- Civic Building Ltd (CCC 100%)
- ChristchurchNZ Holdings Ltd (CCC 100%)
- Transwaste Canterbury Ltd (CCC 38.9%)
- Riccarton Bush Trust (CCC appoints five of eight members)
- Rod Donald Banks Peninsula Trust (administered by CCC)
- Christchurch Agency for Energy Trust (administered by CCC) *deregistered 31 May 2020*
- Central Plains Water Trust (established by the CCC and SDC)
- Sicon Limited (SDC 100%)
- Tramway Reserve Trust (administered by SDC)
- Selwyn District Charitable Trust (administered by SDC).

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, SDC and City Care, 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, Vbase sites, City Care 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, SDC and City Care 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. Criteria included historical market share, value for money and capacity and capability to undertake the work. We received regulatory advice from PwC and legal advice as part of this change in procurement practise.

Based on our experiences during the COVID period we continued this new practice, with work allocated to our service providers on the basis of their work levels using a rolling average over the last three years. We consider that this move incentivises quality, safety and capability development. Our service providers’ achievements in these areas will drive sustainability and efficiency over the long term, delivering our works in a way that is more sustainable for our industry and is in the long-term interest of our customers. We also received regulatory advice from PwC and legal advice as part of this change in procurement practice.

We will develop this model further in FY22.

At the end of the financial year we had PwC review our procurement with Connetics. PwC considers that Orion maintained the arm’s length principle during FY21 on its tendered works.

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 FY19 to ensure that these contracts operate on an arms-length basis. These contracts cover:

- emergency response works, which uses a schedule of rates. Orion has also 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. During FY19 Orion engaged PwC to perform a review of the arrangements in place for FY19, 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. During FY21, after taking legal and regulatory advice, Orion made a payment to Connetics and another emergency works service provider to maintain emergency response capability during the COVID-19 lockdown period. The payment to Connetics was \$1.207m
- 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 FY19 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 FY19 Orion engaged PwC to perform a review of the arrangements in place. PwC considered that the contract meets the arms-length standard

- design work, which uses a schedule of rates. Orion uses several other design consultants as well. In FY19 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.

These contracts remain in place in FY21 and we have therefore not needed to have them reassessed for FY21.

During FY21 Orion paid Connetics \$39.1m (FY20: \$34.3m) for opex and capex. Refer to schedule 5b (iii) of our FY21 Information Disclosures for additional information.

Connetics has its own management, IT and support infrastructure. Accordingly, Orion charges to Connetics for services performed are minimal.

A key exception to this is the provision by Orion of a depot for Connetics' use in Islington. The rental on the property has been negotiated on an arms-length basis with both parties taking independent advice. During FY18 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 FY21. During FY21, after taking legal and regulatory advice, Orion provided \$153,000 of rent relief to Connetics due to the impact of COVID-19.

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 has a wider range of skills than our other more specialist providers but doesn't compete in all market segments. This is discussed further in the next section.

Business relationships with CCC, SDC and CCHL

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 FY21 Orion paid CCC \$4.3m (2020: \$4.1m) for rates (including rates collected on behalf of Environment Canterbury) and a further \$0.05m (2020: \$0.2m) for other opex and capex.

During FY21 Orion paid SDC \$0.2m (2020: \$0.2m) for rates (including rates collected on behalf of Environment Canterbury) and a further \$0.0m (2019: \$0.2m) for other opex and capex.

Refer to schedule 5b (iii) of our FY20 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 Meridian 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
- contributions towards discretionary asset undergrounding. We negotiate with the council using the principles discussed in the previous bullet point to agree a contribution towards the costs of this work. In FY21 we undertook two discretionary undergrounding projects for CCC totaling \$0.2m and one project for SDC for \$0.1m. In FY20 we did not undertake any discretionary undergrounding projects for either council 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, but otherwise has no transactions with CCHL.

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.

City Care provides tree cutting services to Orion following a successful tender awarded on a lowest-price conforming tender basis. Such tenders are sourced from multiple parties. In addition, City Care provides some other services to Orion but generally these are provided as a subcontractor to another contractor. During FY21 Orion paid City Care \$1.0m (2020: \$1.0m) for opex and capex - refer to schedule 5b (iii) of our FY21 Information Disclosures for additional information.

Orion invoices City Care and 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.
- 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.

All large Orion projects were sole sourced tendered to multiple approved service providers during FY21. Orion has no in-house construction or maintenance team.

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

Our procurement method is to sole source tenders from approved service providers for virtually all works above \$20,000. In FY21 we called for tenders for 280 projects totalling \$40m (FY20: 168 projects totalling \$32m). Of these, 82 were awarded to Connetics (FY20: 96) and eight were awarded to City Care (FY20: two).

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 of between \$5,000 and \$20,000, a job manager will seek quoted prices from approved service providers. In FY21 we had just over 1,000 projects in this category (FY20: 600). Of these, 302 were awarded to Connetics (FY20: 161) and one was awarded to City Care (FY20: one).

For minor works with an estimated cost of below \$5,000, a job manager can sole-source from a service provider, either on a quoted or time and materials basis. In FY21 we had around 3,400 projects in this category (FY20: 5,700). Of these, around one seventh were awarded to Connetics and seven were awarded to City Care (FY20: two fifths and 9, respectively).

For low value works (below the \$5,000 threshold) the manager assesses the reasonableness of the price given their knowledge of the requirements and similar and recent works undertaken.

5. Example of procurement policy in practice

Some examples of our procurement policy in practice follow.

- a) Sole source 2019/156E - During Covid-19 Lockdown *Pole Replacement, Area 8 - FY21* was awarded to Connetics on a Measure and Value basis.
- b) Sole source 2019/167E- During Covid-19 Lockdown *Pole Replacement, Area 15 - FY21* was awarded to Lemacon on a Measure and Value basis.
- c) Sole source 2019/156E – Transitioning out of Covid-19 Lockdown *WP96 - Supply Fuse Relocation Project - Camrose Pl, Solway Av, Glenside Av, Dalrye Pl* was awarded to Connetics on a Measure and Value basis, having received a price estimate.
- d) Sole source 2019/157E - Transitioning out of Covid-19 Lockdown *WP98 - Supply Fuse Relocation Project - Gerald Pl, Yardley St, Wyatt Pl* was awarded to Independent Lines Services on a Measure and Value basis, having received a price estimate.
- e) Sole source 2021/080E - Under Covid-19 restriction level 1, but with the real possibility of returning to an elevated restriction level *WP102 - Supply Fuse Relocation Project - West Watson Ave, Warren Cres, Charles Upham Ave, Grigg Pl, Harling Ave* was awarded to Connetics on a Fixed Price basis
- f) Sole source 2021/117E - Under Covid-19 restriction level 1, but with the real possibility of returning to an elevated restriction level *HV Safety Cut - Hororata 113* was awarded to City Care on a Fixed Price basis
- g) Sole source 2021/013E - Under Covid-19 restriction level 1, but with the real possibility of returning to an elevated restriction level *LV Tree Cutting Zone 1 Area E* was awarded to TreeTech on a Fixed Price basis
- h) 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.

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 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. This contract applies until 30 September 2020 but will likely be renegotiated with Connetics.

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 through the establishment of a new point of supply at Norwood and extensive associated works.

Refer to section 6 of our 2021 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
- Matatika – code of ethics
- environmental sustainability policy
- contract delivery guide (replaced by Procurement manual on 26 February 2021)
- sensitive expenditure policy

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 2021

Region A – urban network

Region B – rural network

2021 AMP

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

Proposed



Transpower GXP



Orion 66kV ZS



Orion 33kV ZS



Transpower line



Orion 66kV line



Orion 33kV line



Orion 66kV cable



Orion 66kV SCOF cable



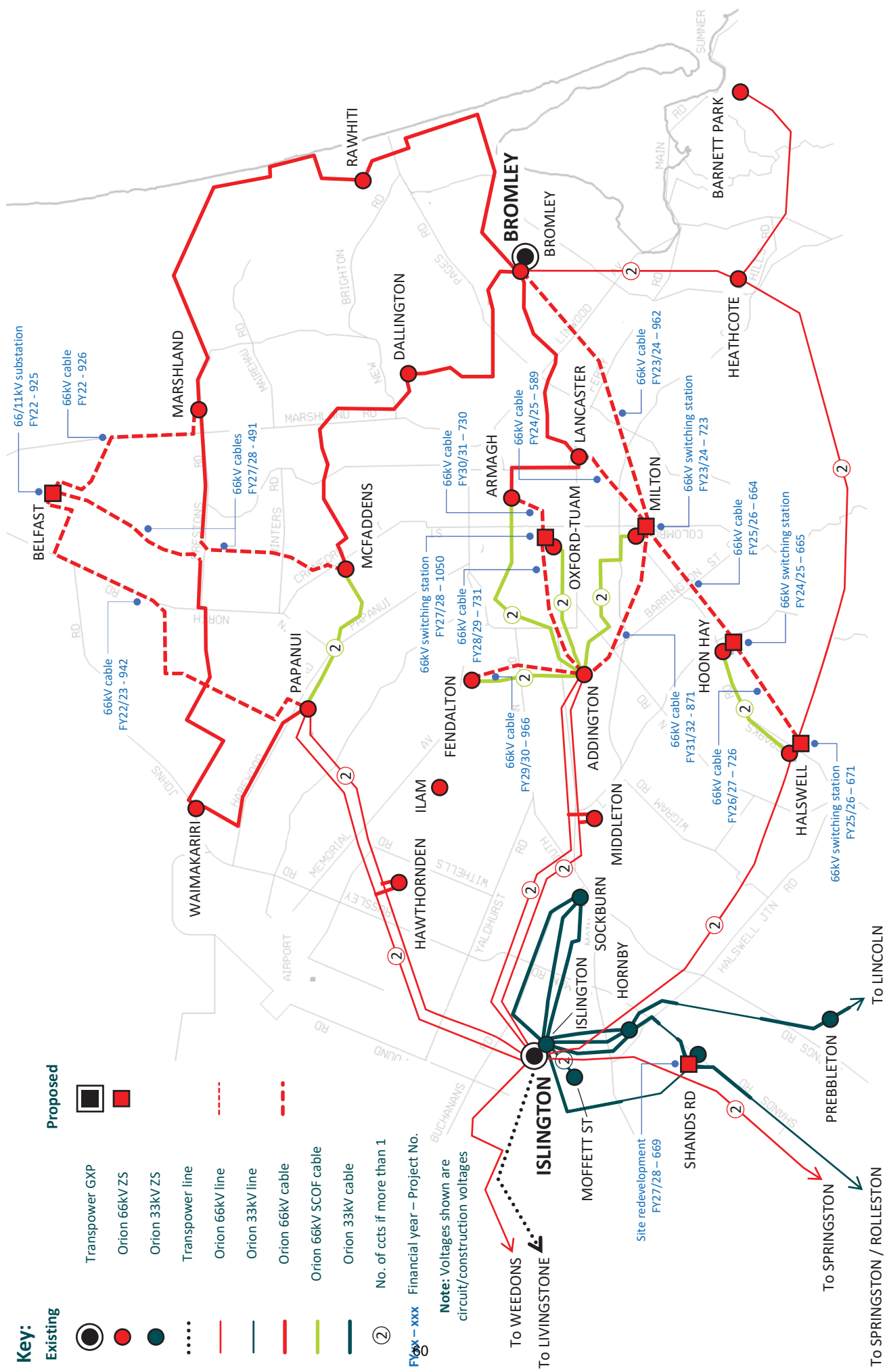
Orion 33kV cable



No. of ccts if more than 1

Fig 6x - xxx Financial year - Project No.

Note: Voltages shown are circuit/construction voltages



2021 AMP

Key:

Existing

- (Black circle with white center)
- (Red circle)
- (Green circle)
- (Blue circle)
- (Yellow circle)
- (Light Green circle)

Proposed

- (Black square)
- (Red square)
- (Green square)
- (Blue square)
- (Yellow square)
- (Light Green square)

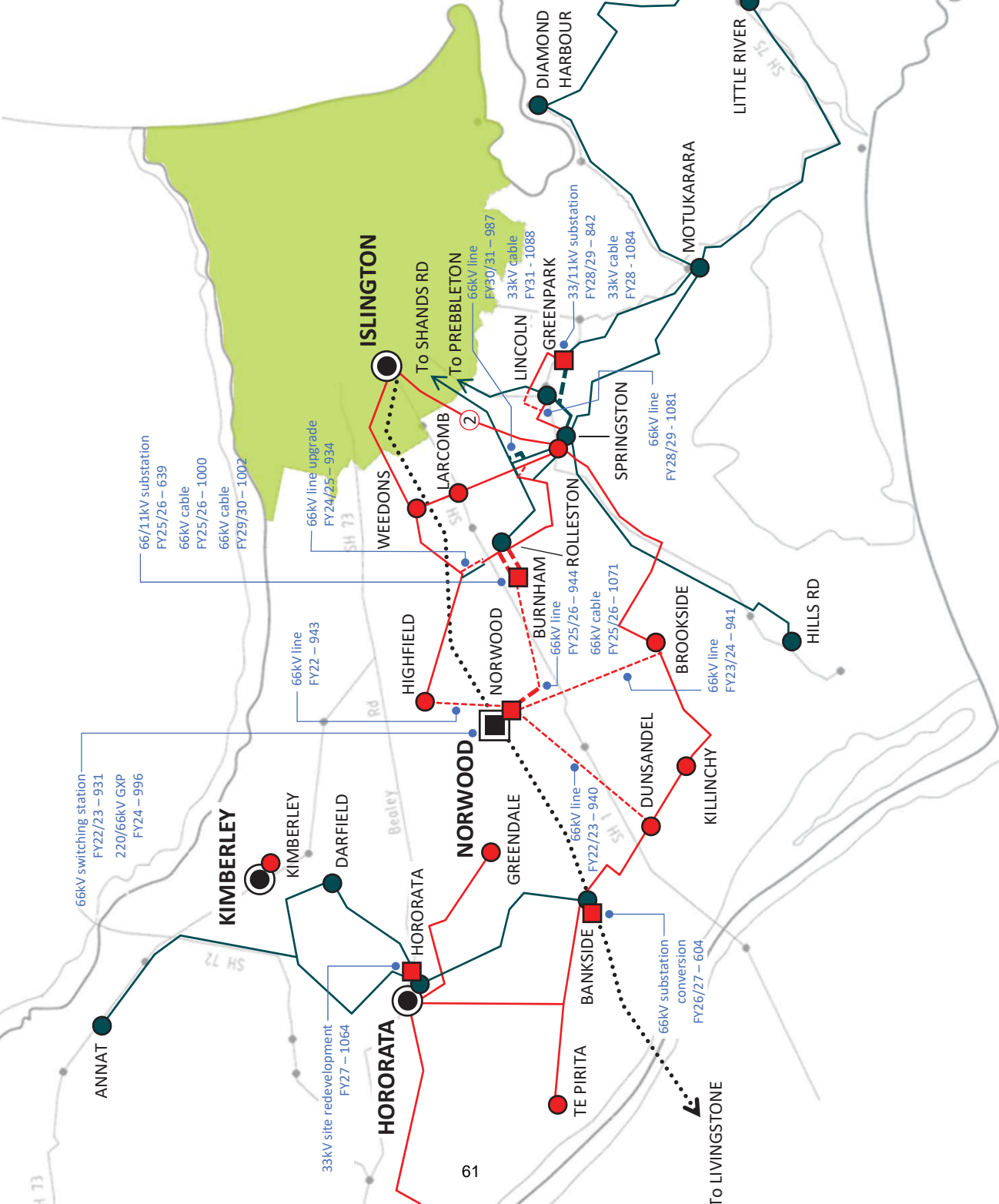
Transpower GXP
 Orion 66kV ZS
 Orion 33kV ZS
 Transpower line
 Orion 66kV line
 Orion 33kV line
 Orion 66kV cable
 Orion 33kV cable

② No. of ccts if more than 1

FYxx – xxx Financial year – Project No.

Region A

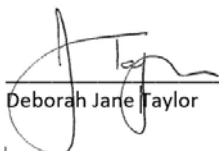
Note: Voltages shown are circuit/construction voltages




Certification for year-end disclosures

We, Deborah Jane Taylor and Bruce Donald Gemmell, 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, 2.4.21, 2.4.22, 2.5.1, 2.5.2 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 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
- d) the SAIDI and SAIFI information has been reported consistently with the Commerce Commission's *Information Disclosure exemption: Disclosure and auditing of reliability information within Schedule 10*, dated 17 May 2021.



Deborah Jane Taylor



Bruce Donald Gemmell

23 August 2021

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 2021 as required by
the electricity distribution information disclosure determination 2012**

The Orion New Zealand Limited (the Company) is required to disclose certain information under the Electricity Distribution Information Disclosure Determination 2012 (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, John Mackey, 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 2021 (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, 5a to 5g, 6a and 6b, 7, 10 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 (the IM Determination), in respect of the basis for valuation of related party transactions (the Related Party Transaction Information).

This assurance report should be read in conjunction with the Commerce Commission's Information Disclosure exemption, issued to all electricity distribution businesses on 17 May 2021 under clause 2.11 of the Determination. The Commerce Commission granted an exemption from the requirement that the assurance report, in respect of the information in schedule 10 of the Determination, must take into account any issues arising out of the Company's recording of SAIDI, SAIFI, and number of interruptions due to successive interruptions.

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 Standard on Assurance Engagements (SAE) 3100 (Revised) Assurance Engagements on Compliance, issued by the New Zealand Auditing and Assurance Standards Board. An engagement conducted in accordance with SAE (NZ) 3100 (Revised) requires that we comply with the International Standard on Assurance Engagements (New Zealand) 3000 (Revised) Assurance Engagements Other Than Audits or Reviews of Historical Financial Information.

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 matter	How our procedures addressed the key assurance matter
<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 audit 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</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; • use of IT auditors to specifically test the reliability of the automated processes used 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

Key assurance matter	How our procedures addressed the key assurance matter
<p>thresholds against which the Company's performance is assessed.</p> <p>There can also be significant consequences if the Company breaches the reliability thresholds.</p> <p>The Commerce Commission has issued an Exemption notice which excludes the assurance report from coverage of the information, in schedule 10 of the Determination, for any issues arising out of the Company's recording of SAIDI, SAIFI and number of interruptions due to successive interruptions. We need to ensure that the Company meets the criteria for the Exemption to apply, including that it makes the necessary disclosures so the exclusion to the assurance opinion applies.</p>	<p>external information sources included works orders for contractors, media reports and Board minutes;</p> <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 whether they were correctly categorised; • checked the SAIDI and SAIFI ratios were correctly calculated in accordance with the Determination and the IM Determination; • obtained explanations for all significant variances to forecast; and • testing the accuracy of the number of connections to the Electricity Authority's register. <p>With respect to the Exemption, we:</p> <ul style="list-style-type: none"> • obtained and documented our understanding of the Company's methods by which electricity outages and their duration are recorded where an outage event results in successive interruptions of supply; • compared this to the documented process that the Company followed in the previous year; and • identified potential incidences of successive interruptions of supply to ensure that the Company's methods, by which electricity outages and their duration are recorded where an outage event results in successive interruptions of supply, were the same for both years. <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</p>	<p>We have obtained an understanding of the Company's approach to identifying and valuing related-party transactions at 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>

Key assurance matter	How our procedures addressed the key assurance matter
<p>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 audit 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 transactions, requires the exercise of significant professional judgement by the auditor.</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 internal pricing estimates used as a basis of determining whether sole tender/quote jobs awarded, were at arm's length by ensuring they were derived from previously confirmed arm's length transactions; • confirming that opinions obtained by the Company from external experts, with the appropriate knowledge and expertise in the prior year, still remain appropriate, on the reasonableness of the approach adopted to determine arm's-length value for related-party transactions for: <ul style="list-style-type: none"> ○ a significant lease; ○ the major emergency works contract; ○ the cable management contract; ○ network storage and supply; and ○ design work. • 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>Our review of the external expert's work included assessment of the appropriateness of the expert's approach, the reasonableness of the assumptions applied, and the conclusion reached. We also assessed the expert's competence, and objectivity.</p> <p>The total variance between our estimates and the Company's estimates of its arm's length values assigned to</p>

Key assurance matter	How our procedures addressed the key assurance matter
	related party transactions was not considered to be material.

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.
- 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 SAE (NZ) 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 independence and ethical requirements of Professional and Ethical Standard 1 issued by the New Zealand Auditing and Assurance Standards Board; and
- quality control requirements, which incorporate the quality control requirements of Professional and Ethical Standard 3 (Amended) issued by the New Zealand Auditing and Assurance Standards Board.

The Auditor-General, and his 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 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.



John Mackey
Audit New Zealand
On behalf of the Auditor-General
Christchurch, New Zealand
26 August 2021