

# Orion New Zealand Limited

## Information for disclosure for the year ended 31 March 2022

### Electricity distribution information disclosure determination 2012

Approved 30 August 2022

Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

### 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

#### 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)
<b>Operational expenditure</b>	19,603	301	90,196	5,478	28,292
Network	8,857	136	40,752	2,475	12,783
Non-network	10,746	165	49,444	3,003	15,509
<b>Expenditure on assets</b>	27,641	424	127,183	7,724	39,894
Network	26,978	414	124,133	7,539	38,937
Non-network	663	10	3,051	185	957

#### 1(ii): Revenue metrics

	Revenue per GWh energy delivered to ICPs (\$/GWh)	Revenue per average no. of ICPs (\$/ICP)
<b>Total consumer line charge revenue</b>	70,234	1,078
Standard consumer line charge revenue	72,088	1,061
Non-standard consumer line charge revenue	27,626	251,990

#### 1(iii): Service intensity measures

Demand density	61	Maximum coincident system demand per km of circuit length (for supply) (kW/km)
Volume density	279	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	15,353	Total energy delivered to ICPs per average number of ICPs (kWh/ICP)

#### 1(iv): Composition of regulatory income

	(\$000)	% of revenue
Operational expenditure	64,307	27.48%
Pass-through and recoverable costs excluding financial incentives and wash-ups	68,483	29.27%
Total depreciation	45,534	19.46%
Total revaluations	81,111	34.66%
Regulatory tax allowance	18,075	7.72%
Regulatory profit/(loss) including financial incentives and wash-ups	118,056	50.45%
<b>Total regulatory income</b>	<b>233,998</b>	

#### 1(v): Reliability

Interruption rate	13.45	Interruptions per 100 circuit km
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Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

**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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2(i): Return on Investment		CY-2	CY-1	Current Year CY
		31 Mar 20	31 Mar 21	31 Mar 22
		%	%	%
<b>ROI – comparable to a post tax WACC</b>				
	Reflecting all revenue earned	7.27%	4.74%	10.02%
	Excluding revenue earned from financial incentives	6.71%	4.53%	10.00%
	Excluding revenue earned from financial incentives and wash-ups	6.71%	4.53%	9.95%
<b>Mid-point estimate of post tax WACC</b>		4.27%	3.72%	3.52%
	25th percentile estimate	3.59%	3.04%	2.84%
	75th percentile estimate	4.95%	4.40%	4.20%
<b>ROI – comparable to a vanilla WACC</b>				
	Reflecting all revenue earned	7.70%	5.07%	10.32%
	Excluding revenue earned from financial incentives	7.13%	4.86%	10.30%
	Excluding revenue earned from financial incentives and wash-ups	7.13%	4.86%	10.25%
<b>WACC rate used to set regulatory price path</b>		6.92%	4.23%	4.23%
<b>Mid-point estimate of vanilla WACC</b>		4.69%	4.05%	3.82%
	25th percentile estimate	4.01%	3.37%	3.14%
	75th percentile estimate	5.37%	4.73%	4.50%
<b>2(ii): Information Supporting the ROI</b>		(\$'000)		
	Total opening RAB value	1,177,019		
	plus Opening deferred tax	(55,483)		
	<b>Opening RIV</b>		1,121,536	
	<b>Line charge revenue</b>		230,403	
	Expenses cash outflow	132,790		
	add Assets commissioned	97,104		
	less Asset disposals	1,728		
	add Tax payments	10,204		
	less Other regulated income	3,595		
	<b>Mid-year net cash outflows</b>		234,775	
	<b>Term credit spread differential allowance</b>		654	
	Total closing RAB value	1,307,972		
	less Adjustment resulting from asset allocation	0		
	less Lost and found assets adjustment	-		
	plus Closing deferred tax	(63,257)		
	<b>Closing RIV</b>		1,244,715	
	<b>ROI – comparable to a vanilla WACC</b>			10.32%
	Leverage (%)			42%
	Cost of debt assumption (%)			2.55%
	Corporate tax rate (%)			28%
	<b>ROI – comparable to a post tax WACC</b>			10.02%

Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

**SCHEDULE 2: REPORT ON RETURN ON INVESTMENT**

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sch ref

**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		10.01%
95			
96	Year-end ROI – comparable to a post tax WACC		9.71%
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**

102	Net recoverable costs allowed under incremental rolling incentive scheme		-
103	Purchased assets – avoided transmission charge		310
104	Energy efficiency and demand incentive allowance		
105	Quality incentive adjustment		-
106	Other financial incentives		-
107	Financial incentives		310
108			
109	Impact of financial incentives on ROI		0.02%
110			
111	Input methodology claw-back		-
112	CPP application recoverable costs		-
113	Catastrophic event allowance		-
114	Capex wash-up adjustment		733
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		733
120			
121	Impact of wash-up costs on ROI		0.05%

Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

### 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).

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sch ref

7	<b>3(i): Regulatory Profit</b>	(\$000)
8	<b>Income</b>	
9	Line charge revenue	230,403
10	plus Gains / (losses) on asset disposals	(594)
11	plus Other regulated income (other than gains / (losses) on asset disposals)	4,189
12		
13	<b>Total regulatory income</b>	<b>233,998</b>
14	<b>Expenses</b>	
15	less Operational expenditure	64,307
16		
17	less Pass-through and recoverable costs excluding financial incentives and wash-ups	68,483
18		
19	<b>Operating surplus / (deficit)</b>	<b>101,208</b>
20		
21	less Total depreciation	45,534
22		
23	plus Total revaluations	81,111
24		
25	<b>Regulatory profit / (loss) before tax</b>	<b>136,785</b>
26		
27	less Term credit spread differential allowance	654
28		
29	less Regulatory tax allowance	17,978
30		
31	<b>Regulatory profit/(loss) including financial incentives and wash-ups</b>	<b>118,153</b>
32		
33	<b>3(ii): Pass-through and Recoverable Costs excluding Financial Incentives and Wash-Ups</b>	(\$000)
34	<b>Pass through costs</b>	
35	Rates	4,587
36	Commerce Act levies	560
37	Industry levies	767
38	CPP specified pass through costs	-
39	<b>Recoverable costs excluding financial incentives and wash-ups</b>	
40	Electricity lines service charge payable to Transpower	61,475
41	Transpower new investment contract charges	975
42	System operator services	-
43	Distributed generation allowance	-
44	Extended reserves allowance	-
45	Other recoverable costs excluding financial incentives and wash-ups	119
46	<b>Pass-through and recoverable costs excluding financial incentives and wash-ups</b>	<b>68,483</b>
47		

Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

**SCHEDULE 3: REPORT ON REGULATORY PROFIT**

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sch ref

		(\$000)	
		CY-1	CY
		31 Mar 21	31 Mar 22
48	<b>3(iii): Incremental Rolling Incentive Scheme</b>		
49			
50			
51	Allowed controllable opex	64,154	66,488
52	Actual controllable opex	65,100	64,307
53			
54	Incremental change in year		3,127
55			
56			
57	CY-5 31 Mar 17	(235)	
58	CY-4 31 Mar 18	1,600	
59	CY-3 31 Mar 19	(4,614)	
60	CY-2 31 Mar 20	n/a	
61	CY-1 31 Mar 21	(946)	
62	<b>Net incremental rolling incentive scheme</b>		-
63			
64	<b>Net recoverable costs allowed under incremental rolling incentive scheme</b>		-
65	<b>3(iv): Merger and Acquisition Expenditure</b>		
66			
67	Merger and acquisition expenditure		-
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	<b>3(v): Other Disclosures</b>		
70			
71	Self-insurance allowance		-

Company Name	Orion New Zealand Limited
For Year Ended	31 March 2022

**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.

sch ref		for year ended	31 Mar 18 (\$000)	31 Mar 19 (\$000)	31 Mar 20 (\$000)	31 Mar 21 (\$000)	31 Mar 22 (\$000)
7	<b>4(i): Regulatory Asset Base Value (Rolled Forward)</b>						
8							
9							
10	Total opening RAB value		1,004,182	1,051,194	1,088,531	1,150,406	1,177,019
11							
12	less Total depreciation		38,762	40,616	43,007	43,559	45,534
13							
14	plus Total revaluations		11,011	15,572	27,543	17,485	81,111
15							
16	plus Assets commissioned		77,003	63,637	78,414	53,187	97,104
17							
18	less Asset disposals		996	1,378	1,074	449	1,728
19							
20	plus Lost and found assets adjustment		-	-	-	-	-
21							
22	plus Adjustment resulting from asset allocation		11,245	117	(0)	(0)	0
23							
24	Total closing RAB value		1,051,194	1,088,531	1,150,406	1,177,019	1,307,972
25							
26							
27							
28							
29	<b>4(ii): Unallocated Regulatory Asset Base</b>						
30							
31	Total opening RAB value						
32	less						
33	plus						
34	plus						
35	Assets commissioned (other than below)		71,445		71,445		
36	Assets acquired from a regulated supplier		-	-	-	-	
37	Assets acquired from a related party		25,659		25,659		
38	Assets commissioned			97,104			97,104
39	less						
40	Asset disposals (other than below)		1,403		1,403		
41	Asset disposals to a regulated supplier		-	-	-	-	
42	Asset disposals to a related party		325		325		
43	Asset disposals			1,728			1,728
44							
45	plus Lost and found assets adjustment			-			-
46							
47	plus Adjustment resulting from asset allocation						0
48							
49	Total closing RAB value			1,309,229			1,307,972
50							

\* 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 2022

**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.

sch ref

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

51				
52				
53				
54	CPI <sub>t</sub>			1,142
55	CPI <sub>t-4</sub>			1,068
56	Revaluation rate (%)			6.93%
57				
58				
59				
60	Total opening RAB value			
61	less Opening value of fully depreciated, disposed and lost assets			
62				
63	Total opening RAB value subject to revaluation			
64	Total revaluations			
65				

**4(iv): Roll Forward of Works Under Construction**

67				
68	Works under construction—preceding disclosure year			
69	plus Capital expenditure			
70	less Assets commissioned			
71	plus Adjustment resulting from asset allocation			
72	Works under construction - current disclosure year			
73	Highest rate of capitalised finance applied			
74				
75				

**4(v): Regulatory Depreciation**

76				
77				
78				
79	Depreciation - standard			
80	Depreciation - no standard life assets			
81	Depreciation - modified life assets			
82	Depreciation - alternative depreciation in accordance with CPP			
83	Total depreciation			



**Orion New Zealand Limited**  
For Year Ended **31 March 2022**

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

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sch ref  
84

**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
N/A				

\* 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 substations and transformers	Distribution switchgear	Other network assets	Non-network assets	Total
Total opening RAB value	68,647	85,731	143,428	126,716	382,754	133,951	143,414	35,401	56,977	1,177,019
less Total depreciation	2,514	2,547	7,132	5,176	12,911	3,855	5,803	1,576	4,020	45,534
plus Total revaluations	4,753	5,940	9,928	8,772	26,517	9,272	9,926	2,356	3,647	81,111
plus Assets commissioned	3,301	1,905	16,044	9,319	30,183	9,879	20,213	3,825	2,435	97,104
less Asset disposals	4		12	22		94	109	1,191	296	1,728
plus Lost and found assets adjustment										
plus Adjustment resulting from asset allocation										
plus Asset category transfers										
<b>Total closing RAB value</b>	<b>74,183</b>	<b>91,029</b>	<b>162,256</b>	<b>139,609</b>	<b>426,543</b>	<b>149,153</b>	<b>167,641</b>	<b>38,815</b>	<b>58,743</b>	<b>1,307,972</b>

**Asset Life**

Weighted average remaining asset life  
Weighted average expected total asset life

35.2	40.4	31.8	32.0	37.8	34.0	31.2	26.2	26.0	(years)
45.7	57.8	44.6	47.3	58.0	45.1	41.2	32.5	31.3	(years)

Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

### 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 10

sch ref

		(\$000)	
7	<b>5a(i): Regulatory Tax Allowance</b>		
8	<b>Regulatory profit / (loss) before tax</b>		136,785
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	762	*
12	Amortisation of initial differences in asset values	15,223	
13	Amortisation of revaluations	5,457	
14			21,442
15			
16	<i>less</i> Total revaluations	81,111	
17	Income included in regulatory profit / (loss) before tax but not taxable	343	*
18	Discretionary discounts and customer rebates	-	
19	Expenditure or loss deductible but not in regulatory profit / (loss) before tax	59	*
20	Notional deductible interest	12,507	
21			94,020
22			
23	<b>Regulatory taxable income</b>		64,207
24			
25	<i>less</i> Utilised tax losses	-	
26	Regulatory net taxable income		64,207
27			
28	Corporate tax rate (%)	28%	
29	<b>Regulatory tax allowance</b>		17,978

\* 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)	
34			
35			
36	Opening unamortised initial differences in asset values	326,988	
37	<i>less</i> Amortisation of initial differences in asset values	15,223	
38	<i>plus</i> Adjustment for unamortised initial differences in assets acquired	-	
39	<i>less</i> Adjustment for unamortised initial differences in assets disposed	279	
40	Closing unamortised initial differences in asset values		311,486
41			
42	Opening weighted average remaining useful life of relevant assets (years)		21
43			

Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

### 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 78

sch ref

44	<b>5a(iv): Amortisation of Revaluations</b>		(\$000)
45			
46	Opening sum of RAB values without revaluations	1,043,344	
47			
48	Adjusted depreciation	40,077	
49	Total depreciation	45,534	
50	Amortisation of revaluations		5,457
51			
52	<b>5a(v): Reconciliation of Tax Losses</b>		(\$000)
53			
54	Opening tax losses	-	
55	plus Current period tax losses	-	
56	less Utilised tax losses	-	
57	Closing tax losses		-
58	<b>5a(vi): Calculation of Deferred Tax Balance</b>		(\$000)
59			
60	Opening deferred tax	(55,483)	
61			
62	plus Tax effect of adjusted depreciation	11,222	
63			
64	less Tax effect of tax depreciation	11,626	
65			
66	plus Tax effect of other temporary differences*	(2,987)	
67			
68	less Tax effect of amortisation of initial differences in asset values	4,262	
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	120	
73			
74	plus Deferred tax cost allocation adjustment	(0)	
75			
76	Closing deferred tax		(63,257)
77			
78	<b>5a(vii): Disclosure of Temporary Differences</b>		
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	<b>5a(viii): Regulatory Tax Asset Base Roll-Forward</b>		
82			(\$000)
83	Opening sum of regulatory tax asset values	470,318	
84	less Tax depreciation	41,522	
85	plus Regulatory tax asset value of assets commissioned	86,045	
86	less Regulatory tax asset value of asset disposals	2,030	
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		512,811

Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

**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)
<b>5b(i): Summary—Related Party Transactions</b>		
Total regulatory income		3,840
Market value of asset disposals		325
Service interruptions and emergencies	11,055	
Vegetation management	728	
Routine and corrective maintenance and inspection	5,536	
Asset replacement and renewal (opex)	995	
<b>Network opex</b>		<b>18,314</b>
Business support	480	
System operations and network support	7	
<b>Operational expenditure</b>		<b>18,801</b>
Consumer connection	7,187	
System growth	2,059	
Asset replacement and renewal (capex)	12,093	
Asset relocations	204	
Quality of supply	4,116	
Legislative and regulatory	–	
Other reliability, safety and environment	–	
<b>Expenditure on non-network assets</b>		<b>–</b>
<b>Expenditure on assets</b>		<b>25,659</b>
Cost of financing		–
Value of capital contributions		9
Value of vested assets		–
<b>Capital Expenditure</b>		<b>25,650</b>
<b>Total expenditure</b>		<b>44,451</b>
Other related party transactions		4,845

	Name of related party	Nature of opex or capex service provided	Total value of transactions (\$000)
	Connetics Limited	Service interruptions and emergencies	11,055
	Connetics Limited	Vegetation management	–
	Connetics Limited	Routine and corrective maintenance and inspection	5,515
	Connetics Limited	Asset replacement and renewal (opex)	995
	Connetics Limited	Business support	476
	Connetics Limited	System operations and network support	7
	Connetics Limited	Consumer connection	6,779
	Connetics Limited	System growth	2,059
	Connetics Limited	Asset replacement and renewal (capex)	12,078
	Connetics Limited	Asset relocations	181
	Connetics Limited	Quality of supply	4,116
	Connetics Limited	Expenditure on non-network assets	–
	Christchurch City Council	Asset replacement and renewal (capex)	6
	Christchurch City Council	Asset relocations	23
	Christchurch City Council	System growth	–
	Christchurch City Council	Expenditure on non-network assets	–
	Christchurch City Council	Routine and corrective maintenance and inspection	19
	Christchurch City Council	System operations and network support	–
	Christchurch City Council	Business support	4
	Selwyn District Council	Routine and corrective maintenance and inspection	–
	Selwyn District Council	Vegetation management	–
	Selwyn District Council	Asset replacement and renewal (capex)	9
	City Care Limited	Vegetation management	728
	City Care Limited	System growth	–
	City Care Limited	Asset replacement and renewal (capex)	–
	City Care Limited	Routine and corrective maintenance and inspection	2
	Christchurch International Airport	Consumer connection	408
	<b>Total value of related party transactions</b>		<b>44,460</b>

\* include additional rows if needed

**Orion New Zealand Limited**  
For Year Ended **31 March 2022**

### 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.

sch ref

#### 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	BKBM + 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	BKBM + 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

408,500,000  
42%

Average opening and closing RAB values  
Attribution Rate (%)

1,242,495  
0%

Term credit spread differential allowance

654

Company Name  
**Orion New Zealand Limited**  
 For Year Ended  
**31 March 2022**

**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		Arm's length deduction	Value allocated (\$'000s)	OVABAA allocation increase (\$'000s)	
			Electricity distribution	Non-electricity distribution	Total
7	<b>5d(f): Operating Cost Allocations</b>				
8					
9					
10	<b>Service interruptions and emergencies</b>				
11	Directly attributable		10,327		
12	Not directly attributable		-		
13	<b>Total attributable to regulated service</b>		10,327		
14	<b>Vegetation management</b>				
15	Directly attributable		4,825		
16	Not directly attributable		-		
17	<b>Total attributable to regulated service</b>		4,825		
18	<b>Routine and corrective maintenance and inspection</b>				
19	Directly attributable		12,558		
20	Not directly attributable		-		
21	<b>Total attributable to regulated service</b>		12,558		
22	<b>Asset replacement and renewal</b>				
23	Directly attributable		1,345		
24	Not directly attributable		-		
25	<b>Total attributable to regulated service</b>		1,345		
26	<b>System operations and network support</b>				
27	Directly attributable		20,094		
28	Not directly attributable		-		
29	<b>Total attributable to regulated service</b>		20,094		
30	<b>Business support</b>				
31	Directly attributable		15,123		
32	Not directly attributable		35	792	827
33	<b>Total attributable to regulated service</b>		15,158		
34					
35	<b>Operating costs directly attributable</b>		64,272		
36	<b>Operating costs not directly attributable</b>		35	792	827
37	<b>Operational expenditure</b>		64,307		
38					

Company Name  
 Orion New Zealand Limited  
 For Year Ended  
 31 March 2022

**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.

39	<b>5d(ii): Other Cost Allocations</b>			
40	Pass through and recoverable costs			
41	Pass through costs			
42	Directly attributable	5,914		
43	Not directly attributable	—		
44	<b>Total attributable to regulated service</b>	5,914		
45	Recoverable costs			
46	Directly attributable	62,569		
47	Not directly attributable	—		
48	<b>Total attributable to regulated service</b>	62,569		
49				
50	<b>5d(iii): Changes in Cost Allocations* †</b>			
51	Change in cost allocation 1			
52	Cost category			
53	Original allocator or line items			
54	New allocator or line items			
55				
56				
57	Rationale for change			
58				
59				
60				
61	Change in cost allocation 2			
62	Cost category			
63	Original allocator or line items			
64	New allocator or line items			
65				
66				
67	Rationale for change			
68				
69				
70	Change in cost allocation 3			
71	Cost category			
72	Original allocator or line items			
73	New allocator or line items			
74				
75	Rationale for change			
76				
77				

	(\$'000)
	5,914
	—
	5,914

	(\$'000)
	62,569
	—
	62,569










\* 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

Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

**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
<b>Subtransmission lines</b>	
Directly attributable	74,183
Not directly attributable	-
<b>Total attributable to regulated service</b>	74,183
<b>Subtransmission cables</b>	
Directly attributable	91,029
Not directly attributable	-
<b>Total attributable to regulated service</b>	91,029
<b>Zone substations</b>	
Directly attributable	162,256
Not directly attributable	-
<b>Total attributable to regulated service</b>	162,256
<b>Distribution and LV lines</b>	
Directly attributable	139,609
Not directly attributable	-
<b>Total attributable to regulated service</b>	139,609
<b>Distribution and LV cables</b>	
Directly attributable	426,543
Not directly attributable	-
<b>Total attributable to regulated service</b>	426,543
<b>Distribution substations and transformers</b>	
Directly attributable	149,153
Not directly attributable	-
<b>Total attributable to regulated service</b>	149,153
<b>Distribution switchgear</b>	
Directly attributable	167,641
Not directly attributable	-
<b>Total attributable to regulated service</b>	167,641
<b>Other network assets</b>	
Directly attributable	38,815
Not directly attributable	-
<b>Total attributable to regulated service</b>	38,815
<b>Non-network assets</b>	
Directly attributable	49,086
Not directly attributable	9,657
<b>Total attributable to regulated service</b>	58,743
<b>Regulated service asset value directly attributable</b>	1,298,315
<b>Regulated service asset value not directly attributable</b>	9,657
<b>Total closing RAB value</b>	1,307,972

**5e(ii): Changes in Asset Allocations\* †**

		(\$000)	
		CY-1	Current Year (CY)
<b>Change in asset value allocation 1</b>			
Asset category		Original allocation	
Original allocator or line items		New allocation	
New allocator or line items		Difference	-
Rationale for change			
<b>Change in asset value allocation 2</b>			
Asset category		Original allocation	
Original allocator or line items		New allocation	
New allocator or line items		Difference	-
Rationale for change			
<b>Change in asset value allocation 3</b>			
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 component  
 † include additional rows if needed



Company Name **Orion New Zealand Limited**

For Year Ended **31 March 2022**

**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	<b>6a(i): Expenditure on Assets</b>		
8	Consumer connection		35,353
9	System growth		12,752
10	Asset replacement and renewal		28,438
11	Asset relocations		1,389
12	Reliability, safety and environment:		
13	Quality of supply	2,209	
14	Legislative and regulatory	-	
15	Other reliability, safety and environment	8,362	
16	<b>Total reliability, safety and environment</b>		10,571
17	<b>Expenditure on network assets</b>		88,503
18	Expenditure on non-network assets		2,175
19			
20	<b>Expenditure on assets</b>		90,678
21	plus Cost of financing		-
22	less Value of capital contributions		3,645
23	plus Value of vested assets		-
24			
25	<b>Capital expenditure</b>		87,033
26	<b>6a(ii): Subcomponents of Expenditure on Assets (where known)</b>		(\$000)
27	Energy efficiency and demand side management, reduction of energy losses		N/A
28	Overhead to underground conversion		-
29	Research and development		720
30	<b>6a(iii): Consumer Connection</b>		
31	Consumer types defined by EDB*	(\$000)	(\$000)
32	Subdivisions	7,834	
33	Large customers	2,241	
34	General connections	13,759	
35	Switchgear	7,896	
36	Transformers	3,623	
37	* include additional rows if needed		
38	<b>Consumer connection expenditure</b>		35,353
39			
40	less Capital contributions funding consumer connection expenditure	2,547	
41	<b>Consumer connection less capital contributions</b>		32,806
42	<b>6a(iv): System Growth and Asset Replacement and Renewal</b>		
43		System Growth	Asset Replacement and Renewal
44		(\$000)	(\$000)
45	Subtransmission	9,513	1,501
46	Zone substations	249	3,104
47	Distribution and LV lines	456	3,901
48	Distribution and LV cables	1,369	4,760
49	Distribution substations and transformers		3,394
50	Distribution switchgear		6,991
51	Other network assets	1,165	4,787
52	<b>System growth and asset replacement and renewal expenditure</b>	12,752	28,438
53	less Capital contributions funding system growth and asset replacement and renewal	-	26
54	<b>System growth and asset replacement and renewal less capital contributions</b>	12,752	28,412
55			
56	<b>6a(v): Asset Relocations</b>		
57	Project or programme*	(\$000)	(\$000)
58	NZTA and others	29	
59	CERA/SCIRT/Otakaro (Rebuild)	32	
60	Selwyn District Council	931	
61	Christchurch City Council	381	
62	Others	16	
63	* include additional rows if needed		
64	All other projects or programmes - asset relocations		
65	<b>Asset relocations expenditure</b>		1,389
66	less Capital contributions funding asset relocations	1,072	
67	<b>Asset relocations less capital contributions</b>		317

Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

**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)
69	<b>6a(vi): Quality of Supply</b>		
70	<i>Project or programme*</i>		
71	Comms associated with Entec line switches	109	
72	Norwood ZS 66kv	446	
73	Belfast ZS to Papanui ZS 66kV cable	33	
	Dunsandel ZS 66kV line bay	174	
	Milton ZS 66kV switchgear & building	70	
	Coleridge generator conn./reliability improvement	301	
	11kV Reinforcement	323	
74	LV network monitoring	720	
	Other	33	
75			
76	<i>* include additional rows if needed</i>		
77	All other projects programmes - quality of supply		
78	<b>Quality of supply expenditure</b>		2,209
79	less Capital contributions funding quality of supply		
80	<b>Quality of supply less capital contributions</b>		2,209
81	<b>6a(vii): Legislative and Regulatory</b>		
82	<i>Project or programme*</i>	(\$000)	(\$000)
83	No projects with this as the primary driver	-	
84			
85			
86			
87			
88	<i>* include additional rows if needed</i>		
89	All other projects or programmes - legislative and regulatory		
90	<b>Legislative and regulatory expenditure</b>		-
91	less Capital contributions funding legislative and regulatory		
92	<b>Legislative and regulatory less capital contributions</b>		-
93	<b>6a(viii): Other Reliability, Safety and Environment</b>		
94	<i>Project or programme*</i>	(\$000)	(\$000)
95	LV Ties replacement with Krone	31	
96	400V UG Supply Fuse Relocation Program	8,331	
97			
98			
99			
100	<i>* include additional rows if needed</i>		
101	All other projects or programmes - other reliability, safety and environment		
102	<b>Other reliability, safety and environment expenditure</b>		8,362
103	less Capital contributions funding other reliability, safety and environment		
104	<b>Other reliability, safety and environment less capital contributions</b>		8,362
105			
106	<b>6a(ix): Non-Network Assets</b>		
107	<b>Routine expenditure</b>		
108	<i>Project or programme*</i>	(\$000)	(\$000)
109	Vehicles and mobile plant	602	
110	Information solutions	999	
111	Sundry tools and equipment	248	
112	Sundry land and buildings	326	
113			
114	<i>* include additional rows if needed</i>		
115	All other projects or programmes - routine expenditure	-	
116	<b>Routine expenditure</b>		2,175
117	<b>Atypical expenditure</b>		
118	<i>Project or programme*</i>	(\$000)	(\$000)
119	N/A		
120			
121			
122			
123			
124	<i>* include additional rows if needed</i>		
125	All other projects or programmes - atypical expenditure		
126	<b>Atypical expenditure</b>		-
127			
128	<b>Expenditure on non-network assets</b>		2,175

Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

### 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	<b>6b(i): Operational Expenditure</b>		
8	Service interruptions and emergencies	10,327	
9	Vegetation management	4,825	
10	Routine and corrective maintenance and inspection	12,558	
11	Asset replacement and renewal	1,345	
12	<b>Network opex</b>		29,055
13	System operations and network support	20,094	
14	Business support	15,158	
15	<b>Non-network opex</b>		35,252
16			
17	<b>Operational expenditure</b>		64,307
18	<b>6b(ii): Subcomponents of Operational Expenditure (where known)</b>		
19	Energy efficiency and demand side management, reduction of energy losses		-
20	Direct billing*		-
21	Research and development		-
22	Insurance		2,495
23	* Direct billing expenditure by suppliers that directly bill the majority of their consumers		

Company Name **Orion New Zealand Limited**  
For Year Ended **31 March 2022**

## 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 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

7	<b>7(i): Revenue</b>	<b>Target (\$000) <sup>1</sup></b>	<b>Actual (\$000)</b>	<b>% variance</b>
8	Line charge revenue	228,835	230,403	1%
9	<b>7(ii): Expenditure on Assets</b>	<b>Forecast (\$000) <sup>2</sup></b>	<b>Actual (\$000)</b>	<b>% variance</b>
10	Consumer connection	15,121	35,353	134%
11	System growth	18,172	12,752	(30%)
12	Asset replacement and renewal	25,468	28,438	12%
13	Asset relocations	2,735	1,389	(49%)
14	Reliability, safety and environment:			
15	Quality of supply	7,281	2,209	(70%)
16	Legislative and regulatory		–	–
17	Other reliability, safety and environment	7,298	8,362	15%
18	<b>Total reliability, safety and environment</b>	<b>14,579</b>	<b>10,571</b>	<b>(27%)</b>
19	<b>Expenditure on network assets</b>	<b>76,075</b>	<b>88,503</b>	<b>16%</b>
20	Expenditure on non-network assets	8,829	2,175	(75%)
21	Expenditure on assets	84,904	90,678	7%
22	<b>7(iii): Operational Expenditure</b>			
23	Service interruptions and emergencies	8,200	10,327	26%
24	Vegetation management	4,520	4,825	7%
25	Routine and corrective maintenance and inspection	12,940	12,558	(3%)
26	Asset replacement and renewal	2,475	1,345	(46%)
27	<b>Network opex</b>	<b>28,135</b>	<b>29,055</b>	<b>3%</b>
28	System operations and network support	17,695	20,094	14%
29	Business support	19,819	15,158	(24%)
30	<b>Non-network opex</b>	<b>37,514</b>	<b>35,252</b>	<b>(6%)</b>
31	<b>Operational expenditure</b>	<b>65,649</b>	<b>64,307</b>	<b>(2%)</b>
32	<b>7(iv): Subcomponents of Expenditure on Assets (where known)</b>			
33	Energy efficiency and demand side management, reduction of energy losses	–	N/A	–
34	Overhead to underground conversion	2,735	–	(100%)
35	Research and development	856	720	(16%)
36				
37	<b>7(v): Subcomponents of Operational Expenditure (where known)</b>			
38	Energy efficiency and demand side management, reduction of energy losses	–	–	–
39	Direct billing	–	–	–
40	Research and development	–	–	–
41	Insurance	2,569	2,495	(3%)
42				

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

<sup>2</sup> 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)

**8(i): Billed Quantities by Price Component**

This schedule requires the billed quantities and associated line charge revenues for each price category code used by the EDI 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.

**8(i): Billed Quantities by Price Component**

Consumer group name or price category code	Consumer type or types (eg. 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)	Billed quantities by price component											
					Price component	Streetlighting/ Fixed charge (\$/kWd)	General Fixed charge (GFWd)	Streetlighting/ general/irrigation/ Weekday day volume (VOLUME)	Streetlighting/ general/irrigation/ Night and weekend (VOLUME)	General Low power factor charge (LWMPF)	Irrigation Capacity charge (ICCAP)	Irrigation Power factor correction capacitance (ICPFC)	Irrigation Intermittibility rebate (ICIR)	Major customer Fixed charge (MCFWd)	Major customer Additional fixed charge (MCAFC)	
					Unit charging basis (eg. days, kW of demand, kVA of capacity, etc.)	Connection	kW	MWh	MWh	kVA	kW	\$/kWh	\$/MWh	\$/MWh	\$/MWh	
UG	Streetlighting	Standard	489			51,736										
GEN	excluding those classified as LG, Commercial irrigation	Standard	2,345,380			209,685	494,124	1,150,337,787	1,291,249,394							
IRE	Commercial irrigation	Standard	1,052						76,375							
MCC	Large commercial and industrial	Standard	798,319											403	101	
LCC	Large capacity	Non-standard	15													
		[Select one]														
		[Select one]														
		[Select one]														
		[Select one]														
Add extra rows for additional consumer groups or price category codes as necessary																
Standard consumer totals																
Non-standard consumer totals																
Total for all consumers																
			213,654	3,143,699		51,736	209,685	494,124	1,150,337,787	1,291,249,394	76,375	23,657	48,232	403	101	
			15	136,820												
			213,669	3,280,519												

21

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

Consumer group name or price category code	Consumer type or types (eg. residential, commercial etc.)	Standard or non-standard consumer group (specify)	Total line charge revenue in disclosure year	Notional revenue discounts (if applicable)	Total transmission line charge revenue (if available)	Line charge revenues (\$000) by price component											
						Price component	Streetlighting/ Fixed charge (\$/kWd)	General Fixed charge (GFWd)	Streetlighting/ general/irrigation/ Weekday day volume (VOLUME)	Streetlighting/ general/irrigation/ Night and weekend (VOLUME)	General Low power factor charge (LWMPF)	Irrigation Capacity charge (ICCAP)	Irrigation Power factor correction capacitance (ICPFC)	Irrigation Intermittibility rebate (ICIR)	Major customer Fixed charge (MCFWd)	Major customer Additional fixed charge (MCAFC)	
						Rate (eg. \$ per day, \$ per kWh, etc.)	\$/kWh/day	\$/kWd	\$/MWh	\$/MWh	\$/kVA/day	\$/MWh/day	\$/MWh/day	\$/MWh/day	\$/MWh/day	\$/MWh/day	
UG	Streetlighting	Standard	\$1,802		\$1,802												
GEN	excluding those classified as LG, Commercial irrigation	Standard	\$46,067		\$46,067												
IRE	Commercial irrigation	Standard	\$4,177		\$4,177												
MCC	Large commercial and industrial	Standard	\$12,201		\$12,201										1,472	184,845	
LCC	Large capacity	Non-standard	\$1,647		\$1,647												
		[Select one]															
		[Select one]															
		[Select one]															
		[Select one]															
Add extra rows for additional consumer groups or price category codes as necessary																	
Standard consumer totals																	
Non-standard consumer totals																	
Total for all consumers																	
			\$18,802	\$18,802	\$18,802												
			\$5,000		\$5,000												
			\$24,723		\$24,723										1,472	184,845	
			\$3,790		\$3,790												
Add extra rows for additional consumer groups or price category codes as necessary																	
Standard consumer totals																	
Non-standard consumer totals																	
Total for all consumers																	
			\$18,802	\$18,802	\$18,802												
			\$9,780		\$9,780												
			\$28,582		\$28,582												

**8(iii): Number of ICPs directly billed**

Number of directly billed ICPs at year end

35

Check

OK

22

Company Name  
Orion NZ Ltd  
For Year Ended  
31-Mar-22  
Network / Sub-

Major customer Extra switches (ESW)	Major customer 11kV Metering equipment (EMET)	Major customer 11kV Underground cabling (EGUC)	Major customer 11kV Overhead lines (EGHL)	Major customer Transformer capacity (EGTC)	Major customer Peak charge (MCCPD)	Major customer Nominated maximum demand (MCDMD)	Major customer Metered maximum demand (MCDMD)	Major capacity Operations, maintenance & administration (dedicated assets)	Major capacity Operations, maintenance & administration (dedicated assets)	Large capacity Asset charge (shared assets)	Large capacity Interconnection charge (winter)	Large capacity Interconnection charge (summer)	Connection charge (contract charge)	Customer investment (contract charge)	30-750 kW generators Control period export (DPCP2)	30-750 kW generators Control period export (DPCP2)	Monthly invoice charge (INVFS)	Failure to pay notice (INVFP)	Default and termination notice (INVDAI)	
\$/switch/day	\$/conn/day	\$/km/day	\$/km/day	\$/kVA/day	\$/kVA/day	\$/kVA/day	\$/kVA/day	\$/kVA/day	\$/kVA/day	\$/kVA/day	\$/kVA/day	\$/kVA/day	\$/kVA/day	\$/kVA/day	\$/kVA/yr	\$/kVA/yr	\$/kVA/yr	\$/kVA/yr	\$/kVA/yr	
109	45	7	3	344,088	107,705	270,240	272,807	35,000	31,800	31,800	6,658	20,861	20,861	20,861	16,000	16,000	381	75	471	1
109	45	7	3	344,088	107,705	270,240	272,807	35,000	31,800	31,800	6,658	20,861	20,861	20,861	16,000	16,000	381	75	471	1
132	57	9	2	1,494	510,199	56,394	56,394	300,050	300,050	817,517	381,397	1,008	65,712	192,200	1,008	1,008	514	50	50	50
132	57	9	2	1,494	510,199	56,394	56,394	300,050	300,050	817,517	381,397	1,008	65,712	192,200	1,008	1,008	514	50	50	50

Company Name	Orion NZ Limited
For Year Ended	31-Mar-22
Network / Sub-	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

8	Voltage	Asset category	Asset class	Units	Items at start of	Items at end of	Net change	Data accuracy
					year (quantity)	year (quantity)		(1-4)
9	All	Overhead Line	Concrete poles / steel structure	No.	28,487	28,259	(228)	4
10	All	Overhead Line	Wood poles	No.	59,740	59,620	(120)	4
11	All	Overhead Line	Other pole types	No.	-	-	-	N/A
12	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	506	501	(5)	4
13	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	-	-	-	N/A
14	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	87	90	3	4
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	40	40	-	4
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	-	-	-	N/A
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	2	2	-	4
18	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	-	-	-	N/A
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	-	-	-	N/A
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	-	-	-	N/A
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	-	-	-	N/A
22	HV	Subtransmission Cable	Subtransmission submarine cable	km	-	-	-	N/A
23	HV	Zone substation Buildings	Zone substations up to 66kV	No.	78	80	2	4
24	HV	Zone substation Buildings	Zone substations 110kV+	No.	-	-	-	N/A
25	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	-	-	-	N/A
26	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	113	114	1	4
27	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	-	-	-	4
28	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	332	322	(10)	4
29	HV	Zone substation switchgear	33kV RMU	No.	-	-	-	4
30	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	49	48	(1)	4
31	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	27	27	-	4
32	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	693	694	1	4
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	-	-	-	4
34	HV	Zone Substation Transformer	Zone Substation Transformers	No.	81	87	6	4
35	HV	Distribution Line	Distribution OH Open Wire Conductor	km	3,059	3,047	(12)	3
36	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	-	-	-	N/A
37	HV	Distribution Line	SWER conductor	km	86	86	-	3
38	HV	Distribution Cable	Distribution UG XLPE or PVC	km	1,235	1,283	48	4
39	HV	Distribution Cable	Distribution UG PILC	km	1,530	1,524	(6)	4
40	HV	Distribution Cable	Distribution Submarine Cable	km	-	-	-	N/A
41	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	60	64	4	4
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	771	736	(35)	4
43	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	9,239	9,229	(10)	4
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	-	-	-	4
45	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	4,762	4,886	124	4
46	HV	Distribution Transformer	Pole Mounted Transformer	No.	6,313	6,318	5	3
47	HV	Distribution Transformer	Ground Mounted Transformer	No.	5,553	5,655	102	3
48	HV	Distribution Transformer	Voltage regulators	No.	15	15	-	4
49	HV	Distribution Substations	Ground Mounted Substation Housing	No.	4,816	4,937	121	4
50	LV	LV Line	LV OH Conductor	km	1,748	1,739	(8)	2
51	LV	LV Cable	LV UG Cable	km	3,329	3,426	97	3
52	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	3,704	3,791	86	3
53	LV	Connections	OH/UG consumer service connections	No.	211,437	215,511	4,074	2
54	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	2,787	2,779	(8)	4
55	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot	535	595	60	4
56	All	Capacitor Banks	Capacitors including controls	No.	6	6	-	4
57	All	Load Control	Centralised plant	Lot	46	45	(1)	4
58	All	Load Control	Relays	No.	2,110	2,133	23	3
59	All	Civils	Cable Tunnels	km	1	1	-	4

Company For Year Network

**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.

19/07/2016

Volage	Asset category	Asset class	Number of assets at disclosure year end by installation date																		Units					
			pre-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010		2011	2012	2013	2014	2015
All	Overhead Line	Concrete poles / steel structure	5	9	11	706	1,644	7,752	17,141	7,885	2,942	1	1	1	38	16	24	11	4	7	4	12	12	4	1	1
All	Overhead Line	Wood poles																								
All	Other pole types	Other pole types																								
HV	Subtransmission Line	Subtransmission OH up to 66kV conductor																								
HV	Subtransmission Line	Subtransmission OH 110kV+ conductor																								
HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLP/E)																								
HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)																								
HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)																								
HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLP/E)																								
HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)																								
HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)																								
HV	Subtransmission Cable	Subtransmission submarine cable																								
HV	Zone substation Buildings	Zone substations up to 66kV	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
HV	Zone substation Buildings	Zone substations 110kV+																								
HV	Zone substation switchgear	50/60/710kV CB (Outdoor)																								
HV	Zone substation switchgear	33kV Switch (Ground Mounted)																								
HV	Zone substation switchgear	33kV Switch (Pole Mounted)																								
HV	Zone substation switchgear	33kV RMU																								
HV	Zone substation switchgear	27/33kV CB (Indoor)																								
HV	Zone substation switchgear	3.3/6.6/11/23kV CB (ground mounted)																								
HV	Zone substation switchgear	3.3/6.6/11/23kV CB (pole mounted)																								
HV	Zone Substation Transformer	Zone Substation Transformers																								
HV	Distribution Line	Distribution OH Open Wire Conductor	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
HV	Distribution Line	Distribution OH Aerial Cable Conductor																								
HV	Distribution Line	SWER conductor																								
HV	Distribution Cable	Distribution UG N/P/E or PVC																								
HV	Distribution Cable	Distribution UG R/C																								
HV	Distribution Cable	Distribution Submarine Cable																								
HV	Distribution switchgear	3.3/6.6/11/23kV CB (pole mounted) - reclosers and sectionalisers																								
HV	Distribution switchgear	3.3/6.6/11/23kV CB (Indoor)																								
HV	Distribution switchgear	3.3/6.6/11/23kV switches and fuses (pole mounted)																								
HV	Distribution switchgear	3.3/6.6/11/23kV switch (ground mounted) - except RMU																								
HV	Distribution Transformer	Pole Mounted Transformer	2	3	2	4	12	12	17	18	14	13	14	12	27	35	35	80	64	80	77	155	177	155	99	159
HV	Distribution Transformer	Ground Mounted Transformer																								
HV	Distribution Substations	Ground Mounted Substation Housing																								
HV	Distribution Substations	LV OH Conductor	38	20	109	521	798	689	645	62	78	81	52	61	56	67	71	85	72	58	66	78	104	145	133	165
HV	LV Line	LV OH Cable	3	3	16	349	603	158	228	14	11	7	11	8	13	7	3	3	2	1	1	1	1	1	1	1
HV	LV Street lighting	LV OH/UG Streetlight circuit																								
HV	Connections	OH/UG consumer service connections	8	2	13	207	500	608	443	43	81	73	56	73	84	89	62	65	56	26	31	41	64	86	101	116
HV	Protection	Protection relays (electromechanical, solid state and numeric)	0	2	4	411	668	488	552	43	77	66	52	66	69	87	50	58	55	24	29	41	93	92	98	129
HV	SCADA and communications	SCADA and communications equipment operating as a single syst. Lot				99	135	73	5,842	2,687	2,417	2,506	2,603	3,452	3,559	3,366	3,271	2,623	2,109	2,313	1,807	2,188	3,748	5,724	6,419	
HV	Capacitor Banks	Capacitor Banks				57	271	118	7	3	20	86	172	65	102	186	79	93	82	119	97	107	192	84	113	139
HV	Load Control	Capacitors including controls																								
HV	Load Control	Centralised plant																								
HV	Load Control	Relays																								
HV	Load Control	Cable Tunnels																								



Orion NZ Limited												
Entire Network												
31-Mar-22												
2017	2018	2019	2020	2021	2022	2023	2024	2025	No. with age 2025 unknown	Items at end of year	No. with default dates	Data accuracy (1-4)
-	-	4	-	-	-	-	-	-	-	28,259	-	3
-	1,023	1,092	1,297	1,091	1,158	780	-	-	-	59,620	7	3
-	-	-	-	-	-	-	-	-	-	-	-	N/A
-	0	16	-	-	1	2	-	-	-	501	4	4
-	1	3	3	1	0	4	-	-	-	90	4	4
-	0	-	-	-	-	-	-	-	-	40	-	4
-	-	-	-	-	-	-	-	-	-	-	-	N/A
-	-	-	-	-	-	-	-	-	-	2	4	4
-	-	-	-	-	-	-	-	-	-	-	-	N/A
-	-	-	-	-	-	-	-	-	-	-	-	N/A
-	-	-	-	-	-	-	-	-	-	-	-	N/A
-	2	-	-	-	-	-	-	-	-	80	-	N/A
-	-	-	-	-	-	-	-	-	-	-	-	N/A
-	-	-	-	-	-	-	-	-	-	-	-	N/A
-	4	-	-	-	3	-	-	-	-	114	-	4
-	-	-	-	-	-	-	-	-	-	322	16	3
-	12	-	6	-	6	-	-	-	-	48	-	4
-	-	-	-	-	-	-	-	-	-	27	-	4
-	11	-	-	6	-	-	-	-	-	694	-	4
-	2	5	-	26	-	-	-	-	-	-	-	N/A
-	-	-	-	-	-	-	-	-	-	-	-	N/A
-	-	1	3	-	2	-	-	-	-	87	-	4
-	20	57	34	32	29	3	-	-	3,047	-	-	3
-	-	-	-	-	-	-	-	-	-	-	-	N/A
-	-	-	-	-	-	-	-	-	-	86	-	3
37	69	64	43	38	50	-	-	-	1,283	-	-	4
1	1	0	-	0	1	-	-	-	1,524	-	-	4
-	-	-	-	-	-	-	-	-	-	-	-	N/A
6	8	6	-	-	-	-	-	-	64	-	-	4
8	3	-	-	-	-	-	-	-	736	-	-	4
238	276	139	101	122	154	-	-	-	9,229	-	-	4
-	-	-	-	-	-	-	-	-	-	-	-	4
183	151	129	216	114	76	-	-	-	4,886	-	-	3
117	113	48	69	74	37	-	-	-	6,318	-	-	3
158	158	85	140	60	74	-	-	-	5,655	-	-	3
-	-	-	-	-	-	-	-	-	-	-	-	15
115	109	126	96	83	154	-	-	-	4,937	-	-	4
3	1	1	1	1	1	0	-	-	1,739	-	-	2
76	76	92	97	64	97	-	-	290	1,739	-	-	2
82	55	95	103	113	90	-	-	-	3,426	-	-	3
5,344	4,382	3,946	4,090	5,180	5,714	-	-	-	215,511	-	-	104,819
99	65	159	150	48	61	-	-	-	2,779	-	-	3
39	56	83	113	19	3	-	-	-	3	-	-	3
-	-	4	-	-	-	-	-	-	6	-	-	4
-	2	-	-	-	-	-	-	-	45	-	-	4
49	60	16	34	33	23	-	-	-	1,695	-	-	3
-	-	-	-	-	-	-	-	-	-	2,133	-	3
-	-	-	-	-	-	-	-	-	-	1	-	4

Company Name

Orion NZ Limited

For Year Ended

31-Mar-22

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	<b>Circuit length by operating voltage (at year end)</b>	<b>Overhead (km)</b>	<b>Underground (km)</b>	<b>Total circuit length (km)</b>
11	> 66kV	—	—	—
12	50kV & 66kV	259	91	350
13	33kV	242	42	284
14	SWER (all SWER voltages)	86	2	88
15	22kV (other than SWER)	—	—	—
16	6.6kV to 11kV (inclusive—other than SWER)	3,047	2,805	5,852
17	Low voltage (< 1kV)	1,739	3,426	5,165
18	<b>Total circuit length (for supply)</b>	<b>5,374</b>	<b>6,365</b>	<b>11,740</b>
19				
20	Dedicated street lighting circuit length (km)	896	2,894	3,791
21	Circuit in sensitive areas (conservation areas, iwi territory etc) (km)			91
22				
23	<b>Overhead circuit length by terrain (at year end)</b>	<b>(% of total Circuit length (km) overhead length)</b>		
24	Urban	1,663		31%
25	Rural	3,147		59%
26	Remote only	144		3%
27	Rugged only	183		3%
28	Remote and rugged	237		4%
29	Unallocated overhead lines	—		—
30	<b>Total overhead length</b>	<b>5,374</b>		<b>100%</b>
31				
32		<b>(% of total circuit length (km) length)</b>		
33	Length of circuit within 10km of coastline or geothermal areas (where knowr	1,897		16%
34				
35	Overhead circuit requiring vegetation management	<b>(% of total Circuit length (km) overhead length)</b>		
		5,374		100%

Company Name **Orion New Zealand Limited**  
 For Year Ended **31 March 2022**

**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
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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 2022
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	<b>9e(i): Consumer Connections</b>	
9	Number of ICPs connected in year by consumer type	
10		<b>Number of connections (ICPs)</b>
11	Consumer types defined by EDB*	
12	Streetlighting	8
13	General	5,988
14	Irrigation	4
15	Major customer	12
16	Large capacity	-
17	* include additional rows if needed	
18	<b>Connections total</b>	<b>6,012</b>
19	<b>Distributed generation</b>	
20	Number of connections made in year	1,053 connections
21	Capacity of distributed generation installed in year	15.13 MVA
22	<b>9e(ii): System Demand</b>	
23		<b>Demand at time of maximum coincident demand (MW)</b>
24		
25	<b>Maximum coincident system demand</b>	
26	GXP demand	712
27	plus Distributed generation output at HV and above	1
28	<b>Maximum coincident system demand</b>	<b>713</b>
29	less Net transfers to (from) other EDBs at HV and above	0
30	<b>Demand on system for supply to consumers' connection points</b>	<b>713</b>
31	<b>Electricity volumes carried</b>	<b>Energy (GWh)</b>
32	Electricity supplied from GXPs	3,401
33	less Electricity exports to GXPs	0
34	plus Electricity supplied from distributed generation	15
35	less Net electricity supplied to (from) other EDBs	0.21
36	<b>Electricity entering system for supply to consumers' connection points</b>	<b>3,416</b>
37	less Total energy delivered to ICPs	3,281
38	<b>Electricity losses (loss ratio)</b>	<b>135 4.0%</b>
39		
40	<b>Load factor</b>	<b>0.55</b>
41	<b>9e(iii): Transformer Capacity</b>	
42		<b>(MVA)</b>
43	Distribution transformer capacity (EDB owned)	2,273
44	Distribution transformer capacity (Non-EDB owned, estimated)	220
45	<b>Total distribution transformer capacity</b>	<b>2,493</b>
46		
47	<b>Zone substation transformer capacity</b>	<b>1,159</b>

Company Name **Orion New Zealand Limited**

For Year Ended **31 March 2022**

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

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**10(i): Interruptions**

**Interruptions by class**

Number of interruptions	
Class A (planned interruptions by Transpower)	–
Class B (planned interruptions on the network)	578
Class C (unplanned interruptions on the network)	999
Class D (unplanned interruptions by Transpower)	1
Class E (unplanned interruptions of EDB owned generation)	–
Class F (unplanned interruptions of generation owned by others)	–
Class G (unplanned interruptions caused by another disclosing entity)	–
Class H (planned interruptions caused by another disclosing entity)	–
Class I (interruptions caused by parties not included above)	1
<b>Total</b>	<b>1,579</b>

**Interruption restoration**

	≤3Hrs	>3hrs
Class C interruptions restored within	650	349

**SAIFI and SAIDI by class**

	SAIFI	SAIDI
Class A (planned interruptions by Transpower)	–	–
Class B (planned interruptions on the network)	0.07	24.9
Class C (unplanned interruptions on the network)	0.60	53.0
Class D (unplanned interruptions by Transpower)	0.00	0.1
Class E (unplanned interruptions of EDB owned generation)	–	–
Class F (unplanned interruptions of generation owned by others)	–	–
Class G (unplanned interruptions caused by another disclosing entity)	–	–
Class H (planned interruptions caused by another disclosing entity)	–	–
Class I (interruptions caused by parties not included above)	0.00	1.4
<b>Total</b>	<b>0.68</b>	<b>79.35</b>

**Normalised SAIFI and SAIDI**

	Normalised SAIFI	Normalised SAIDI
Classes B & C (interruptions on the network)	0.68	71.2

Company Name **Orion New Zealand Limited**

For Year Ended **31 March 2022**

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	0.01	0.9
Vegetation	0.09	5.4
Adverse weather	0.08	20.4
Adverse environment	0.00	0.9
Third party interference	0.05	4.6
Wildlife	0.01	0.7
Human error	0.07	1.6
Defective equipment	0.23	14.9
Cause unknown	0.06	3.6

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

Main equipment involved	SAIFI	SAIDI
Subtransmission lines	–	–
Subtransmission cables	–	–
Subtransmission other	0.00	0.0
Distribution lines (excluding LV)	0.04	13.6
Distribution cables (excluding LV)	0.00	0.9
Distribution other (excluding LV)	0.03	10.4

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

Main equipment involved	SAIFI	SAIDI
Subtransmission lines	0.03	1.6
Subtransmission cables	–	–
Subtransmission other	0.05	0.4
Distribution lines (excluding LV)	0.33	42.8
Distribution cables (excluding LV)	0.15	5.4
Distribution other (excluding LV)	0.04	2.9

**10(v): Fault Rate**

Main equipment involved	Circuit length		Fault rate (faults per 100km)
	Number of Faults	(km)	
Subtransmission lines	10	501	2.00
Subtransmission cables	–	132	–
Subtransmission other	2		
Distribution lines (excluding LV)	642	3,134	20.49
Distribution cables (excluding LV)	82	2,807	2.92
Distribution other (excluding LV)	107		
<b>Total</b>	<b>843</b>		

Company Orion New Zealand Limited

Year ended 31 March 2022

## **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 FY22 post-tax regulatory ROI was 10.0% (FY21: 4.7%; FY20: 7.3%). FY22's ROI includes a 6.93% CPI movement (FY21: 1.5%).

No items were reclassified in FY21 or FY22.

### *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):

	FY22 \$m
Rental revenue and recovery of outgoings	2.1
Recoveries from third parties who cause to damage to our network	0.9
Other	1.2
Total	<u>4.2</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:

	FY22 \$m	FY21 \$m	FY20 \$m	FY19 \$m	FY18 \$m	FY17 \$m	FY16 \$m	FY15 \$m	FY14 \$m
Regulatory profit – as disclosed	118	56	81	74	72	78	63	81	51
Less quake insurance cash settlements	-	-	-	-	-	-	-	(24)	-
Less indexed asset revaluations	(81)	(17)	(28)	(16)	(11)	(21)	(5)	(1)	(13)
Add back loss on asset disposals	1	-	1	1	1	1	3	1	5
Add back identified quake related opex	-	-	-	-	-	-	-	-	-
Underlying regulatory profit	<u>38</u>	<u>39</u>	<u>54</u>	<u>59</u>	<u>62</u>	<u>58</u>	<u>61</u>	<u>57</u>	<u>43</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 FY22, we estimate that we have charged customers \$1.93m below our MAR for FY22. This amount is still subject to wash-ups as improved information becomes available. We will increase revenue by the final amount plus interest when setting delivery prices for FY24.

No items were reclassified in FY21 or FY22.



*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 FY22 our RAB value increased as follows:

	<b>FY22 \$m</b>
Opening RAB value	1,177
Add new assets commissioned	97
Add indexed asset revaluation (at CPI)	81
Less asset disposals at RAB value	(2)
Less depreciation and amortisation	(45)
Closing RAB value	<u>1,308</u>

Our \$97m of commissioned assets in FY22 is significantly higher than FY21 (\$53m). Our works under construction fell by \$10m during the year with a number of significant projects commenced, but not completed in the prior year.

*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**

	<b>FY22</b>
	<b>\$m</b>
<b>Taxable income that is not in regulatory profit before tax</b>	-
<b>Expenditure that is not deductible:</b>	
Legal and entertainment expenses	0.8
	<hr/> 0.8 <hr/>
<b>Income that is not taxable</b>	
Tax capital gain on allocation of insurance proceeds	0.4
<b>Deductible expenditure that is not in regulatory profit before tax:</b>	
Costs to obtain land easements	-
	<hr/> 0.4 <hr/>

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

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

**Box 6: Regulatory tax: temporary differences**

	<b>FY22 \$m</b>
Expenditure timing differences for tax deductibility	-
Insurance cash settlement proceeds – assessable for tax purposes	0.2
Finance lease payments – operating leases for tax purposes	(0.1)
Internal profits on capex – deductible for tax purposes	(1.1)
Capex – deductible for tax purposes	(1.9)
Net total	<u>(2.9)</u>

*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 (\$1.0m in FY22 out of total opex of \$64m) we do not consider it necessary to put more complex recording systems in place – consistent with the proxy approach.

No items were reclassified in FY21 or FY22.

*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 FY21 and FY22.

*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:

- \$89m (last year: \$78m) for network assets
- \$2m (last year: \$4m) for non-network assets.

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

Schedule 6a(iv) discloses \$13m of capex for system growth and \$28m for asset replacement and renewal. Our major projects and programmes in these areas which exceeded \$2m were

	<b>System growth \$m</b>	<b>Replacement &amp; renewal \$m</b>
Supply fuse relocation		8
11kV switchgear replacement		5
11kV network circuit breaker replacement		3
Distribution pole replacement		4
Replacement of distribution transformers		2
LV, 11kV and subtransmission conductor and poles		2
Belfast to Marshland 66v cable	4	
Belfast zone substation	3	
Other projects and programmes	6	4
<b>Total</b>	<b>13</b>	<b>28</b>

No capex items were reclassified in FY22.

*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 \$1.3m of FY22 maintenance opex as asset replacement and renewal:

	<b>FY22</b>
	<b>\$m</b>
Retightening and cross-arm and insulator work on 11kV overhead lines	0.8
GElectric and Geomedia (GIS) software maintenance	0.3
Other	0.2
	<hr/>
	1.3
	<hr/>

There were no material atypical items of expenditure in FY22.

No items were reclassified during FY22.

*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 \$85m and actual capex at \$91m. The key offsetting reasons for this overspend of \$6m are:

	<b>FY22 \$m</b>
Connections (customer-driven)	9
Subdivision extension	5
Transformers	2
Dunsandel to Norwood 66kV cable	(1)
Highfield to Norwood 66kV cable	(1)
Norwood zone substation	(2)
Belfast 66kV cable (postponed)	(5)
Other (net)	(1)
Overspend relative to our AMP forecast	<u>6</u>

**OPEX**

Schedule 7(iii) discloses our AMP forecast opex of \$65.6m and actual opex of \$64.3m. This \$1.3m underspend is due to a \$1.0m overspend in network opex offset by a \$2.3m favourable variance in non-network opex.

The key reasons for these two variances are:

<b>Network opex</b>	<b>FY22 \$m</b>
Service interruptions and emergencies	2.1
Vegetation management	0.3
Routine and corrective maintenance and inspection	(0.4)
Asset replacement and renewal opex	(1.0)
<b><u>Overspend</u></b> relative to our AMP forecast	<u>1.0</u>

During FY22, after taking legal and regulatory advice, Orion made a payment to Connetics and two other emergency works service providers to maintain emergency response capability during the COVID-19 lockdown period. These payments totalled \$0.7m.



	<b>FY22 \$m</b>
<b>Non-network opex</b>	
Salaries and wages – increase in capitalised labour	2.0
Community engagement, sponsorship and communications	1.4
Commercial and regulatory	0.5
Consultancy	(0.5)
Salaries and wages	(0.3)
Strategic services	(1.2)
Other	0.4
<b><u>Underspend</u></b> relative to our AMP forecast	2.3

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 FY22.

*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 target revenue, as disclosed in our “Methodology for deriving delivery prices” document, with billed revenue we have made the following adjustments:

- Capital contributions of \$174k have been excluded from target revenue
- Irrigation rebates and export and generation credits totalling \$1,063k have been excluded from billed revenue
- Invoice charges and fees associated with default and termination notices totalling \$14k have been excluded from billed revenue

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

	<b>Target \$m</b>	<b>Actual \$m</b>	<b>Difference \$m</b>
Distribution	165.8	166.7	0.9
Transmission	62.9	63.7	0.8
<b>Delivery revenue</b>	<b>228.7</b>	<b>230.4</b>	<b>1.7</b>

The main factor contributing to the difference between target and billed revenue was general connection (including streetlighting connections) peak charges which were \$3.5m above target. This was the result of demand being 24 MW 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 FY22, we estimate that we have charged customers \$1.93m below our MAR for FY22. This amount is still subject to wash-ups as improved information becomes available. We will recover the final amount plus interest when setting delivery prices for FY24.

*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 2022

## 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	272
Christchurch City Council	<u>4,573</u>
<b>Total</b>	<b><u>4,845</u></b>

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 FY22 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.

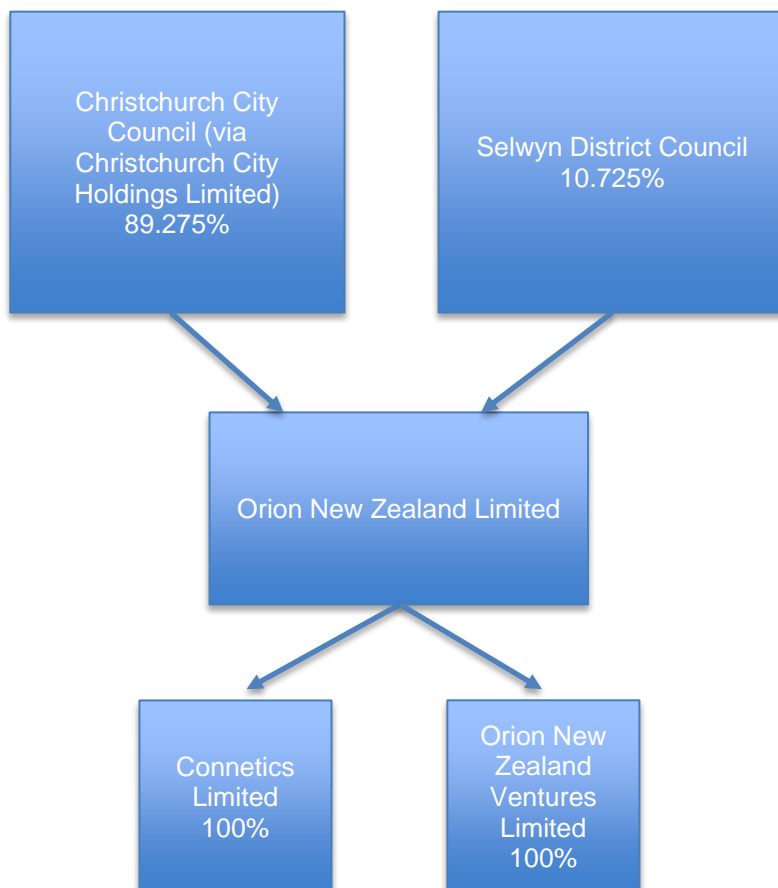


In FY22 we spent a total of:

	2022	2021
	\$m	\$m
Opex (from IDD schedule 6b(i), row 17)	64	65
Capex (from IDD schedule 6a(i), row 20)	91	80
<b>Total expenditure</b>	<b>155</b>	<b>145</b>

Orion’s expenditure with related parties in FY22, as disclosed in IDD schedule 5b, amounted to \$44m (FY21: \$40m), around 29% (FY21: 28%) of our overall capex and opex. This includes \$5m of rates paid to related parties in both years.

### 3. Clause 2.3.8 Diagram or description of related party transactions



Orion is owned by:

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

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

Orion has two wholly-owned subsidiaries:

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

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

These 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%)
- RBL Property Limited (CCHL 100%)
- EcoCentral Limited (CCHL 100%)
- Development Christchurch Limited (CCHL 100%)
- Venues Otautahi Ltd (CCC 100%)
- Civic Building Ltd (CCC 100%)
- ChristchurchNZ Holdings Ltd (CCC 100%)
- Transwaste Canterbury Ltd (CCC 38.9%)
- Riccarton Bush Trust (CCC appoints five of eight members)
- Rod Donald Banks Peninsula Trust (administered by CCC)
- Central Plains Water Trust (established by the CCC and SDC)
- CMUA Project Delivery Limited (CCC 100%)
- Otahahi Community Housing Trust (administered by CCC)
- CORDE 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](http://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 lockdowns period and the ongoing impact of COVID, we continued this new practice for some works while migrating back to competitive tendering where possible, and where this did not have a detrimental impact on the viability of suppliers. The work was 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 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.

At the end of the financial year we had PwC review our procurement with Connetics. As there has been no material change in the Orion, Connetics relationship, the relationship would be deemed to still be appropriate.

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

- Project Management Office (PMO) where Connetics managed some projects for Orion. During FY22 these projects were for works engaged and contracted directly between Orion and the Service Provider.
- 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 FY22 Orion engaged PwC to perform a review of the arrangements in place for FY22, and also to review the basis for a three-year extension of the contract. PwC considered that Connetics’ margins are reasonable, and the contract meets the arms-length test. During FY22, 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 \$0.5m (FY21: \$1.2m). A consistent approach to this payment was applied to other emergency contractors. These circumstances have not changed but will be reviewed during FY23.
- cable supply. As discussed in section 7 below, Orion has negotiated a contract with Connetics to provide cable to all service providers working on its network to ensure the cable is of an appropriate standard. Connetics’ contracting section is charged at the same rates as external parties – which helps keep a competitive market for construction services. During FY22 PwC reviewed the arrangements and concluded that the risk that Connetics earns excessive margins on the cable supply contract that help it subsidise work in other markets is low.

- network storage and supply. This requires Connetics to provide certain minimum levels of emergency spares and to manage Orion-owned equipment – such as transformers and switchgear. During FY22 Orion engaged PwC to perform a review of the arrangements in place. PwC considered that the contract meets the arms-length standard and this arrangement was in place for FY22.
- design work, which uses a schedule of rates. Orion uses several other design consultants as well. In FY22 Orion engaged PwC to perform a review of the intercompany arrangements. PwC determined that rates charged are comparable with those charged by other design service providers and the contract meets the arms-length standard.

These contracts remained in place in FY22 and PwC have reassessed these and still achieve arms length outcomes.

During FY22 Orion paid Connetics \$43.3m (FY21: \$42.2m) for opex and capex. Refer to schedule 5b (iii) of our FY22 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 FY22.

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

As our former contracting division, Connetics retains a wider range of skills than our other 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 FY22 Orion paid CCC \$4.6m (2021: \$4.3m) for rates (including rates collected on behalf of Environment Canterbury) and a further \$0.06m (2021 \$0.05m) for other opex and capex.

During FY22 Orion paid SDC \$0.3m (2021: \$0.2m) for rates (including rates collected on behalf of Environment Canterbury) and a further \$0.01m (2021: \$0.2m) for other opex and capex.

Refer to schedule 5b (iii) of our FY22 Information Disclosures for additional information.

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

Orion also invoices SDC and CCC for:

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

Orion pays the CCC's share of its dividend to CCHL, 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 FY22 Orion paid City Care \$0.7m (2021: \$1.0m) for opex and capex - refer to schedule 5b (iii) of our FY22 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
- support best practice Health and Safety practice with our Service Providers
- 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 source tendered to multiple approved service providers during FY22. 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			Total Number of Authorised Service Providers
	Related Party		Non-related Parties	
	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 conduct closed tenders from approved service providers for virtually all works above \$20,000 that are business as usual.

For major projects where we are able to engage the wider market, Orion uses competitive tenders. Examples include 66kv cable supply, civil works for 66kv cable installation, Zone Substation buildings.

For connections works (Livening Agent) we conducted 20 competitive tenders. Connetics were awarded 4.

In FY22 we called for tenders for 183 projects totalling \$39m (FY21: 280 projects totalling \$32m). Of these, 74 were awarded to Connetics (FY21: 82) and four were awarded to City Care (FY21: eight).

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.

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.

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.

For Network tendering, most of the works were awarded under “yours-to-lose” as per the Service Providers market share; except for example a). that was competitive tender.

- a) Competitive Tender 2022/164E Norwood Zone Substation Design, FY22 was awarded to Connetics on a lowest conforming tender.
- b) Sole Source 2022/028E Pole replacement Package 4, FY22 was awarded to Independent Lines after receiving a tendered price.
- c) Sole Source 2022/106E Pole Replacement Package 9 FY22 was awarded to Lemacon after receiving a tendered price.
- d) Sole Source 2022/027E Pole Replacement Package 2 FY22 was awarded to Connetics after receiving a tendered price.
- e) Sole Source 2022/110E Supply Fuse Relocation Work Pack12 FY22 was awarded to Connetics after receiving a tendered price.
- f) Sole Source 2022/160E Supply Fuse Relocation Work Pack12 FY22 was awarded to Power Jointing Ltd after receiving a tendered price.

For Property Works tendering all works were awarded from competitive tender during FY22. Of the 11 tenders only one was awarded to a related party.

- a. Competitive Tender 2022/063E LV Tree Cutting Zone 2 Area J. Awarded to City Care by lowest conforming tender.

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 but is currently being replaced with a wider stock management agreement that maintains the existing structure for cable supply.

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 2022 Asset Management Plan for further information.

# Orion New Zealand Limited

## Maps of anticipated expenditure and network constraints

for the ten year period beginning 1 April 2022

Region A – urban network

Region B – rural network

# 2022 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

② 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

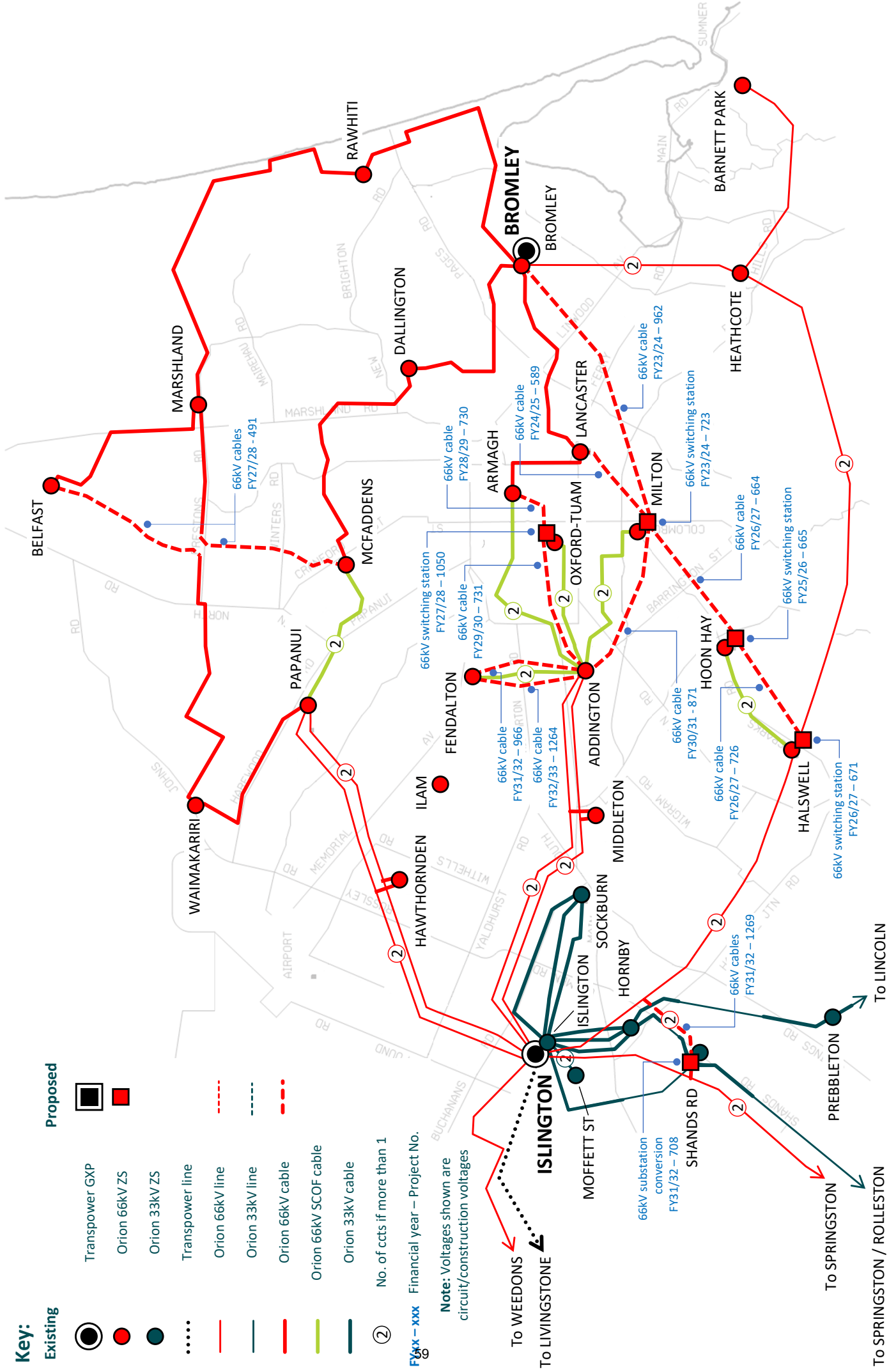
Orion 66kV SCOF cable

Orion 33kV cable

② No. of ccts if more than 1

FYxxx - xxx Financial year - Project No.

**Note:** Voltages shown are circuit/construction voltages



# 2022 AMP

**Key:**

**Existing**

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

**Proposed**

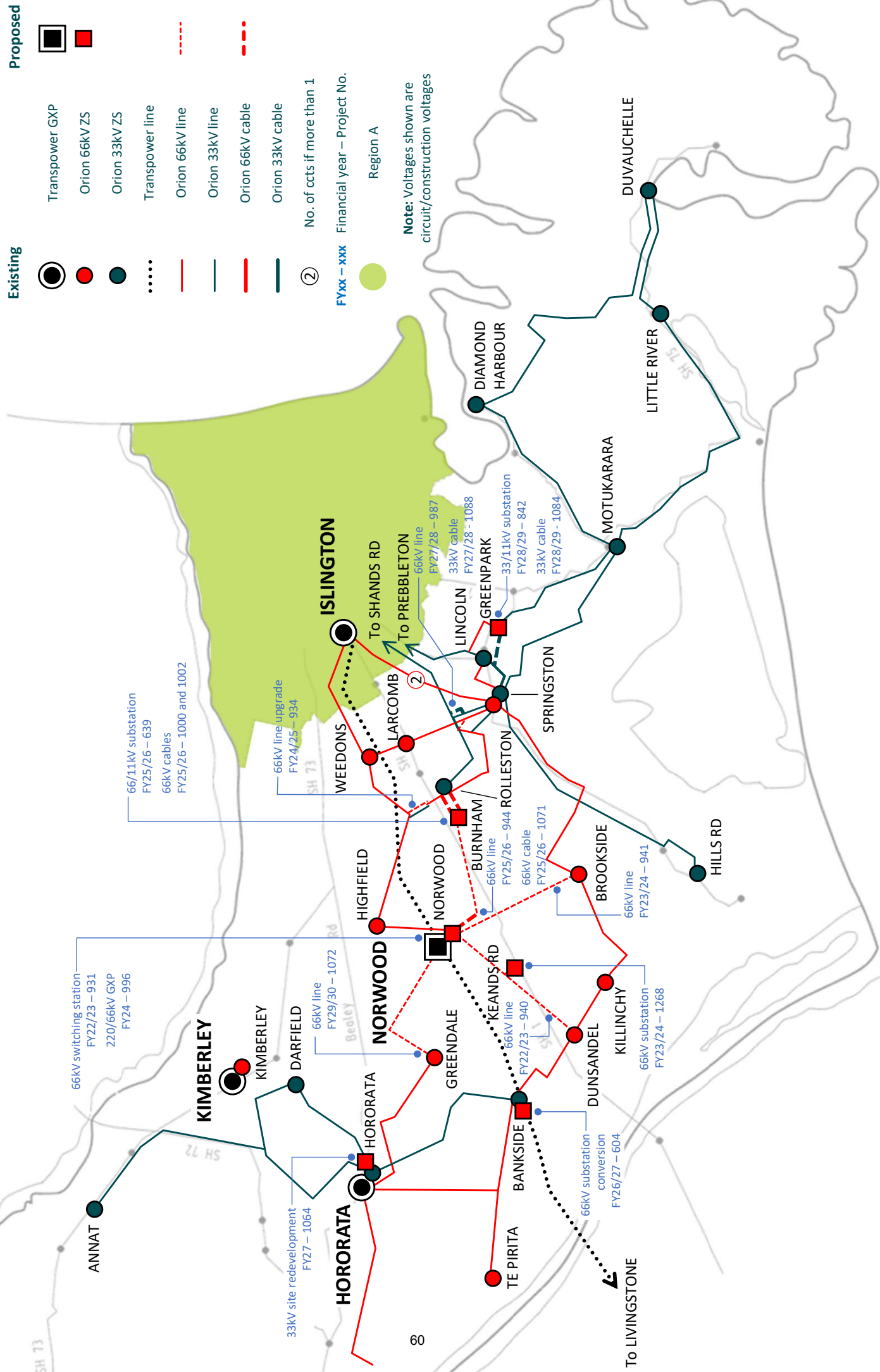
- Transpower GXP
- Orion 66kV ZS
- Orion 33kV ZS
- Transpower line
- Orion 66kV line
- Orion 66kV cable
- Orion 33kV cable

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

- a) the information prepared for the purposes of clauses 2.3.1, 2.3.2, 2.4.21, 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.

Paul Jason Munro

Director

Michael Earl Sang

Director

30 August 2022

## 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 2022 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 2022 (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><b>Accuracy of the number and duration of electricity outages</b></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"> <li>• review and testing of the overall control environment;</li> <li>• use of IT auditors to specifically test the reliability of the automated processes used to record the details of interruptions to supply;</li> <li>• obtaining internal and external information on interruptions to supply to gain assurance that interruptions to supply were recorded. Internal and</li> </ul>

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"> <li>• confirming the interruptions to supply information used in the SAIDI and SAIFI calculations was appropriately extracted from the automated system;</li> <li>• testing a sample of interruptions to supply to source records to conclude whether they were correctly categorised;</li> <li>• checking the SAIDI and SAIFI ratios were correctly calculated in accordance with the Determination and the IM Determination;</li> <li>• obtaining explanations for all significant variances to forecast; and</li> <li>• testing the accuracy of the number of connections to the Electricity Authority's register.</li> </ul> <p>With respect to the Exemption, we:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• compared this to the documented process that the Company followed in the previous year; and</li> <li>• 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.</li> </ul> <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><b>Valuation of related-party transactions at arm's-length</b></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 a value not greater than arm's-length in accordance with the Determination and the IM Determination. We confirmed the approach used is in accordance with the Determination and the IM Determination.</p>



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>	<p>The procedures we have carried out to satisfy ourselves that related-party transactions are appropriately valued at arm's-length included:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• reviewing the appropriateness of procurement policies, especially with related parties, for the different categories of procurement transactions;</li> <li>• 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 a value not greater than arm's length, by ensuring they were derived from previously confirmed arm's length transactions or to other appropriate reliable evidence;</li> <li>• 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 a value not greater than arm's-length value for related-party transactions for: <ul style="list-style-type: none"> <li>○ a significant lease;</li> <li>○ the major emergency works contract;</li> <li>○ the cable management contract;</li> <li>○ network storage and supply; and</li> <li>○ design work;</li> </ul> </li> <li>• a comparison of sales transactions for undergrounding of overhead lines against the depreciated fair value of the replaced assets; and</li> <li>• confirming the material accuracy of related party values disclosed, and compliance of their calculation with the Determination and the IM Determination.</li> </ul> <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,</p>

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

## Directors' responsibilities

The Directors of the Company are responsible in accordance with the Determination for:

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

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

## Auditor's responsibilities

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

- As far as appears from an examination, the information used in the preparation of the audited Disclosure Information has been properly extracted from the Company's accounting and other records, sourced from its financial and non-financial systems.
- As far as appears from an examination, proper records to enable the complete and accurate compilation of the audited Disclosure Information required by the Determination have been kept by the Company and, if not, the records not so kept.
- The Company complied, in all material respects, with the Determination in preparing the audited Disclosure Information.
- 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 and Audit New Zealand and its employees, may deal with the Company and its subsidiaries on normal terms within the ordinary course of trading activities of the Company. Other than any dealings on normal terms within the ordinary course of trading activities of the Company, this engagement, the assurance engagement on 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  
30 August 2022