Electricity Invercargill Ltd

INFORMATION DISCLOSURE PREPARED IN ACCORDANCE WITH ELECTRICITY INFORMATION DISCLOSURE DETERMINATION UNDER PART 4 OF THE COMMERCE ACT 1986

FOR THE YEAR ENDED 31 MARCH 2022

CONTENTS

1. INTRODUCTION

These Information Disclosure documents are submitted by Electricity Invercargill Limited pursuant to Part 4 of the Commerce Act 1986 in accordance with:

- The Electricity Information Disclosure Determination 2012 (consolidated in 2018), issued 3 April 2018,
- The Electricity Distribution Services Input Methodologies Determination 2012 (consolidated 2014), issued 30 March 2015,

2. INFORMATION DISCLOSURE DISCLAIMER

The information disclosed in this Information Disclosure package issued by Electricity Invercargill Limited has been prepared in accordance with the Determination listed above.

The Determination requires the information to be disclosed in the manner it is presented.

The information should not be used for any other purposes than that intended under the Determination.

The financial information presented is for the electricity distribution business as described within the Determination.

Due to rounding and automatic calculations in the spreadsheets there may be minor summing variances.

3. SCHEDULES

Company Name	Electricity Invercargill 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)
Operational expenditure	20,327	293	80,650	7,735	32,780
Network	7,261	105	28,808	2,763	11,709
Non-network	13,066	189	51,842	4,972	21,071
Expenditure on assets	26,477	382	105,050	10,075	42,698
Network	26,477	382	105,050	10,075	42,698
Non-network	–	–	–	–	–

1(ii): Revenue metrics

	Revenue per GWh energy delivered to ICPs ($/GWh)	Revenue per average no. of ICPs ($/ICP)
Total consumer line charge revenue	70,087	1,011
Standard consumer line charge revenue	70,087	1,011
Non-standard consumer line charge revenue	–	–

1(iii): Service intensity measures

Demand density	93	*Maximum coincident system demand per km of circuit length (for supply) (kW/km)*
Volume density	381	*Total energy delivered to ICPs per km of circuit length (for supply) (MWh/km)*
Connection point density	26	*Average number of ICPs per km of circuit length (for supply) (ICPs/km)*
Energy intensity	14,427	*Total energy delivered to ICPs per average number of ICPs (kWh/ICP)*

1(iv): Composition of regulatory income

	($000)	% of revenue
Operational expenditure	5,129	29.14%
Pass-through and recoverable costs excluding financial incentives and wash-ups	5,762	32.73%
Total depreciation	3,495	19.85%
Total revaluations	6,303	35.81%
Regulatory tax allowance	1,117	6.35%
Regulatory profit/(loss) including financial incentives and wash-ups	8,404	47.74%
Total regulatory income	17,604	

1(v): Reliability

Interruption rate	10.25	*Interruptions per 100 circuit km*

Company Name	Electricity Invercargill 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).

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

2(i): Return on Investment

	CY-2 31 Mar 20 %	CY-1 31 Mar 21 %	Current Year CY 31 Mar 22 %
ROI – comparable to a post tax WACC			
Reflecting all revenue earned	6.94%	5.65%	9.25%
Excluding revenue earned from financial incentives	6.93%	5.53%	9.50%
Excluding revenue earned from financial incentives and wash-ups	6.85%	5.53%	9.61%
Mid-point estimate of post tax WACC	4.27%	3.72%	3.52%
25th percentile estimate	3.59%	3.04%	2.84%
75th percentile estimate	4.95%	4.40%	4.20%
ROI – comparable to a vanilla WACC			
Reflecting all revenue earned	7.37%	5.98%	9.55%
Excluding revenue earned from financial incentives	7.35%	5.86%	9.80%
Excluding revenue earned from financial incentives and wash-ups	7.27%	5.86%	9.91%
WACC rate used to set regulatory price path	7.19%	4.57%	4.57%
Mid-point estimate of vanilla WACC	4.69%	4.05%	3.82%
25th percentile estimate	4.01%	3.37%	3.14%
75th percentile estimate	5.37%	4.73%	4.50%

2(ii): Information Supporting the ROI

			($000)	
	Total opening RAB value	91,117		
plus	Opening deferred tax	(4,753)		
Opening RIV			86,364	
Line charge revenue			17,686	
	Expenses cash outflow	10,891		
add	Assets commissioned	6,117		
less	Asset disposals	137		
add	Tax payments	653		
less	Other regulated income	(82)		
Mid-year net cash outflows			17,606	
Term credit spread differential allowance			–	
	Total closing RAB value	99,905		
less	Adjustment resulting from asset allocation	(0)		
less	Lost and found assets adjustment	–		
plus	Closing deferred tax	(5,218)		
Closing RIV			94,688	
ROI – comparable to a vanilla WACC				9.55%
	Leverage (%)			42%
	Cost of debt assumption (%)			2.55%
	Corporate tax rate (%)			28%
ROI – comparable to a post tax WACC				9.25%

2(iii): Information Supporting the Monthly ROI

Opening RIV		N/A

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

Tax payments	N/A
Term credit spread differential allowance	N/A
Closing RIV	N/A
Monthly ROI – comparable to a vanilla WACC	N/A
Monthly ROI – comparable to a post tax WACC	N/A

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

Year-end ROI – comparable to a vanilla WACC	9.87%
Year-end ROI – comparable to a post tax WACC	9.57%

** 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

Net recoverable costs allowed under incremental rolling incentive scheme	(147)	
Purchased assets – avoided transmission charge		
Energy efficiency and demand incentive allowance		
Quality incentive adjustment	(147)	
Other financial incentives		
Financial incentives		(294)
Impact of financial incentives on ROI		–0.25%
Input methodology claw-back		
CPP application recoverable costs		
Catastrophic event allowance		
Capex wash-up adjustment	(131)	
Transmission asset wash-up adjustment		
2013–15 NPV wash-up allowance		
Reconsideration event allowance		
Other wash-ups		
Wash-up costs		(131)
Impact of wash-up costs on ROI		–0.11%

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

sch ref			
7		**3(i): Regulatory Profit**	**($000)**
8		**Income**	
9		Line charge revenue	17,686
10	*plus*	Gains / (losses) on asset disposals	(136)
11	*plus*	Other regulated income (other than gains / (losses) on asset disposals)	54
12			
13		**Total regulatory income**	17,604
14		**Expenses**	
15	*less*	Operational expenditure	5,129
16			
17	*less*	Pass-through and recoverable costs excluding financial incentives and wash-ups	5,762
18			
19		**Operating surplus / (deficit)**	6,713
20			
21	*less*	Total depreciation	3,495
22			
23	*plus*	Total revaluations	6,303
24			
25		**Regulatory profit / (loss) before tax**	9,521
26			
27	*less*	Term credit spread differential allowance	–
28			
29	*less*	Regulatory tax allowance	1,117
30			
31		**Regulatory profit/(loss) including financial incentives and wash-ups**	8,404
32			

sch ref			
33	**3(ii): Pass-through and Recoverable Costs excluding Financial Incentives and Wash-Ups**	**($000)**	
34	**Pass through costs**		
35	Rates	170	
36	Commerce Act levies	46	
37	Industry levies	60	
38	CPP specified pass through costs	–	
39	**Recoverable costs excluding financial incentives and wash-ups**		
40	Electricity lines service charge payable to Transpower	5,166	
41	Transpower new investment contract charges	320	
42	System operator services	–	
43	Distributed generation allowance	–	
44	Extended reserves allowance	–	
45	Other recoverable costs excluding financial incentives and wash-ups	–	
46	**Pass-through and recoverable costs excluding financial incentives and wash-ups**		5,762
47			

sch ref				
48	**3(iii): Incremental Rolling Incentive Scheme**		**($000)**	
49			**CY-1**	**CY**
50			**31 Mar 21**	**31 Mar 22**
51	Allowed controllable opex			
52	Actual controllable opex			
53				
54	Incremental change in year			
55				
56				
57	CY-5	31 Mar 17		
58	CY-4	31 Mar 18		
59	CY-3	31 Mar 19		
60	CY-2	31 Mar 20		
61	CY-1	31 Mar 21		
62	**Net incremental rolling incentive scheme**			
63				
64	**Net recoverable costs allowed under incremental rolling incentive scheme**			

sch ref		
65	**3(iv): Merger and Acquisition Expenditure**	
70		**($000)**
66	Merger and acquisition expenditure	
67		
68	*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)*	
69	**3(v): Other Disclosures**	
70		**($000)**
71	Self-insurance allowance	

pwc

Company Name	Electricity Invercargill 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(i): Regulatory Asset Base Value (Rolled Forward)

		RAB	RAB	RAB	RAB	RAB
	for year ended	31 Mar 18	31 Mar 19	31 Mar 20	31 Mar 21	31 Mar 22
		($000)	($000)	($000)	($000)	($000)
	Total opening RAB value	80,292	84,072	86,605	89,033	91,117
less	**Total depreciation**	2,925	3,120	3,225	3,339	3,495
plus	**Total revaluations**	882	1,245	2,191	1,353	6,303
plus	**Assets commissioned**	5,907	4,533	3,587	4,132	6,117
less	**Asset disposals**	85	126	125	62	137
plus	**Lost and found assets adjustment**	–	–	–	–	–
plus	**Adjustment resulting from asset allocation**	–	–	–	–	(0)
	Total closing RAB value	84,072	86,605	89,033	91,117	99,905

4(ii): Unallocated Regulatory Asset Base

		Unallocated RAB *		RAB	
		($000)	($000)	($000)	($000)
	Total opening RAB value		91,117		91,117
less					
	Total depreciation		3,495		3,495
plus					
	Total revaluations		6,303		6,303
plus					
	Assets commissioned (other than below)				
	Assets acquired from a regulated supplier				
	Assets acquired from a related party	6,117		6,117	
	Assets commissioned		6,117		6,117
less					
	Asset disposals (other than below)	137		137	
	Asset disposals to a regulated supplier				
	Asset disposals to a related party				
	Asset disposals		137		137
plus	**Lost and found assets adjustment**				
plus	**Adjustment resulting from asset allocation**				(0)
	Total closing RAB value		99,906		99,905

** 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.*

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

	CPI_4	1,142
	CPI_4^{-4}	1,068
	Revaluation rate (%)	6.93%

		Unallocated RAB *		RAB	
		($000)	($000)	($000)	($000)
	Total opening RAB value	91,117		91,117	
less	Opening value of fully depreciated, disposed and lost assets	145		145	
	Total opening RAB value subject to revaluation	90,972		90,972	
	Total revaluations		6,303		6,303

4(iv): Roll Forward of Works Under Construction

		Unallocated works under construction		Allocated works under construction	
	Works under construction—preceding disclosure year		1,571		1,571
plus	Capital expenditure	5,754		5,754	
less	Assets commissioned	6,117		6,117	
plus	Adjustment resulting from asset allocation				
	Works under construction - current disclosure year		1,209		1,209
	Highest rate of capitalised finance applied				

4(v): Regulatory Depreciation

	Unallocated RAB *		RAB	
	($000)	($000)	($000)	($000)
Depreciation - standard	3,495		3,495	
Depreciation - no standard life assets				
Depreciation - modified life assets				
Depreciation - alternative depreciation in accordance with CPP				
Total depreciation		3,495		3,495

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

** 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 substations and transformers	Distribution switchgear	Other network assets	Non-network assets	Total
	Total opening RAB value	53	6,788	19,293	2,088	43,082	10,393	6,040	3,380	–	91,117
less	Total depreciation	2	210	674	100	1,559	448	297	205		3,495
plus	Total revaluations	4	470	1,337	144	2,985	712	417	234		6,303
plus	Assets commissioned	1,278	50	1,997	437	775	471	1,027	82		6,117
less	Asset disposals					5	121	11			137
plus	Lost and found assets adjustment										–
plus	Adjustment resulting from asset allocation										–
plus	Asset category transfers										–
	Total closing RAB value	1,333	7,098	21,953	2,569	45,279	11,007	7,176	3,491	–	99,905
	Asset Life										
	Weighted average remaining asset life	24.9	37.7	34.2	29.9	35.3	26.4	24.8	18.1		(years)
	Weighted average expected total asset life	47.1	57.4	51.5	59.6	58.7	45.0	38.5	36.6		(years)

Company Name **Electricity Invercargill 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 2.8.

sch ref					
7	**5a(i): Regulatory Tax Allowance**				**($000)**
8	**Regulatory profit / (loss) before tax**				9,521
9					
10	*plus*	Income not included in regulatory profit / (loss) before tax but taxable		*	
11		Expenditure or loss in regulatory profit / (loss) before tax but not deductible	17	*	
12		Amortisation of initial differences in asset values	1,255		
13		Amortisation of revaluations	436		
14					1,708
15					
16	*less*	Total revaluations	6,303		
17		Income included in regulatory profit / (loss) before tax but not taxable		*	
18		Discretionary discounts and customer rebates			
19		Expenditure or loss deductible but not in regulatory profit / (loss) before tax	22	*	
20		Notional deductible interest	913		
21					7,239
22					
23	**Regulatory taxable income**				3,991
24					
25	*less*	Utilised tax losses			
26		Regulatory net taxable income			3,991
27					
28		Corporate tax rate (%)	28%		
29	**Regulatory tax allowance**				1,117
30					
31	* Workings to be provided in Schedule 14				
32	**5a(ii): Disclosure of Permanent Differences**				
33		In Schedule 14, Box 5, provide descriptions and workings of items recorded in the asterisked categories in Schedule 5a(i).			
34	**5a(iii): Amortisation of Initial Difference in Asset Values**				**($000)**
35					
36		Opening unamortised initial differences in asset values	20,086		
37	*less*	Amortisation of initial differences in asset values	1,255		
38	*plus*	Adjustment for unamortised initial differences in assets acquired	–		
39	*less*	Adjustment for unamortised initial differences in assets disposed	102		
40		Closing unamortised initial differences in asset values			18,729
41					
42		Opening weighted average remaining useful life of relevant assets (years)			16
43					

44	**5a(iv): Amortisation of Revaluations**			($000)
45				
46		Opening sum of RAB values without revaluations	80,524	
47				
48		Adjusted depreciation	3,059	
49		Total depreciation	3,495	
50		Amortisation of revaluations		436
51				
52	**5a(v): Reconciliation of Tax Losses**			($000)
53				
54		**Opening tax losses**	–	
55	*plus*	Current period tax losses	–	
56	*less*	Utilised tax losses	–	
57		**Closing tax losses**		–
58	**5a(vi): Calculation of Deferred Tax Balance**			($000)
59				
60		**Opening deferred tax**	(4,753)	
61				
62	*plus*	Tax effect of adjusted depreciation	856	
63				
64	*less*	Tax effect of tax depreciation	1,051	
65				
66	*plus*	Tax effect of other temporary differences*	61	
67				
68	*less*	Tax effect of amortisation of initial differences in asset values	352	
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	(20)	
73				
74	*plus*	Deferred tax cost allocation adjustment	0	
75				
76		**Closing deferred tax**		(5,218)
77				
78	**5a(vii): Disclosure of Temporary Differences**			
79		*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).*		
80				
81	**5a(viii): Regulatory Tax Asset Base Roll-Forward**			
82				($000)
83		**Opening sum of regulatory tax asset values**	43,754	
84	*less*	Tax depreciation	3,753	
85	*plus*	Regulatory tax asset value of assets commissioned	7,568	
86	*less*	Regulatory tax asset value of asset disposals	29	
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**		47,540

Company Name	**Electricity Invercargill 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

7	**5b(i): Summary—Related Party Transactions**	**($000)**	**($000)**
8	**Total regulatory income**		–
9			
10	**Market value of asset disposals**		
11			
12	Service interruptions and emergencies	521	
13	Vegetation management	–	
14	Routine and corrective maintenance and inspection	965	
15	Asset replacement and renewal (opex)	346	
16	**Network opex**		1,832
17	Business support	1,711	
18	System operations and network support	378	
19	**Operational expenditure**		3,921
20	Consumer connection	1,796	
21	System growth	–	
22	Asset replacement and renewal (capex)	3,643	
23	Asset relocations	1,071	
24	Quality of supply	40	
25	Legislative and regulatory	–	
26	Other reliability, safety and environment	131	
27	**Expenditure on non-network assets**		–
28	**Expenditure on assets**		6,681
29	Cost of financing		
30	Value of capital contributions		1,041
31	Value of vested assets		
32	**Capital Expenditure**		5,640
33	**Total expenditure**		9,561
34			
35	**Other related party transactions**		

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

36			
37	**Name of related party**	**Nature of opex or capex service provided**	**Total value of transactions ($000)**
38	PowerNet Limited	Routine and corrective maintenance and inspection	965
39	PowerNet Limited	Asset replacement and renewal (opex)	346
40	PowerNet Limited	Service interruptions and emergencies	521
42	PowerNet Limited	Business support	1,556
43	Invercargill City Holdings	Business support	155
44	PowerNet Limited	Other reliability, safety and environment	131
45	PowerNet Limited	Asset replacement and renewal (capex)	3,643
46	PowerNet Limited	Consumer connection	1,796
47	PowerNet Limited	Quality of supply	40
48	PowerNet Limited	Asset relocations	1,071
49	PowerNet Limited	System operations and network support	378
50			
51			
52			
53	**Total value of related party transactions**		10,602

54 ** include additional rows if needed*
55

Company Name	Electricity Invercargill 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

7

8 ### 5c(i): Qualifying Debt (may be Commission only)

9

sch ref	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
10									
11									
12									
13									
14									
15									
16	** include additional rows if needed*						–	–	–

17

18 ### 5c(ii): Attribution of Term Credit Spread Differential

19

sch ref			
20	**Gross term credit spread differential**		–
21			
22	Total book value of interest bearing debt		
23	Leverage	42%	
24	Average opening and closing RAB values		
25	**Attribution Rate (%)**		–
26			
27	**Term credit spread differential allowance**		–

Company Name	Electricity Invercargill 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						
7	**5d(i): Operating Cost Allocations**					
8			Value allocated ($000s)			
9		Arm's length deduction	Electricity distribution services	Non-electricity distribution services	Total	OVABAA allocation increase ($000s)
10	**Service interruptions and emergencies**					
11	Directly attributable		521			
12	Not directly attributable				–	
13	**Total attributable to regulated service**		521			
14	**Vegetation management**					
15	Directly attributable		–			
16	Not directly attributable				–	
17	**Total attributable to regulated service**		–			
18	**Routine and corrective maintenance and inspection**					
19	Directly attributable		965			
20	Not directly attributable				–	
21	**Total attributable to regulated service**		965			
22	**Asset replacement and renewal**					
23	Directly attributable		346			
24	Not directly attributable				–	
25	**Total attributable to regulated service**		346			
26	**System operations and network support**					
27	Directly attributable		1,137			
28	Not directly attributable				–	
29	**Total attributable to regulated service**		1,137			
30	**Business support**					
31	Directly attributable		1,892			
32	Not directly attributable		269	20	289	
33	**Total attributable to regulated service**		2,161			
34						
35	**Operating costs directly attributable**		4,860			
36	**Operating costs not directly attributable**	–	269	20	289	–
37	**Operational expenditure**		5,129			
38						

sch ref		
39	**5d(ii): Other Cost Allocations**	
40	**Pass through and recoverable costs**	($000)
41	**Pass through costs**	
42	Directly attributable	276
43	Not directly attributable	
44	**Total attributable to regulated service**	276
45	**Recoverable costs**	
46	Directly attributable	5,486
47	Not directly attributable	
48	**Total attributable to regulated service**	5,486
49		

sch ref					
50	**5d(iii): Changes in Cost Allocations* †**				
51				($000)	
52	**Change in cost allocation 1**			CY-1	Current Year (CY)
53	Cost category		Original allocation		
54	Original allocator or line items		New allocation		
55	New allocator or line items		Difference	–	–
56					
57	Rationale for change				
58					
59					
60				($000)	
61	**Change in cost allocation 2**			CY-1	Current Year (CY)
62	Cost category		Original allocation		
63	Original allocator or line items		New allocation		
64	New allocator or line items		Difference	–	–
65					
66	Rationale for change				
67					
68					
69				($000)	
70	**Change in cost allocation 3**			CY-1	Current Year (CY)
71	Cost category		Original allocation		
72	Original allocator or line items		New allocation		
73	New allocator or line items		Difference	–	–
74					
75	Rationale for change				
76					
77					

78 ** 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.*
79 *† include additional rows if needed*

Company Name	Electricity Invercargill 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
Subtransmission lines	
Directly attributable	1,333
Not directly attributable	
Total attributable to regulated service	1,333
Subtransmission cables	
Directly attributable	7,098
Not directly attributable	
Total attributable to regulated service	7,098
Zone substations	
Directly attributable	21,953
Not directly attributable	
Total attributable to regulated service	21,953
Distribution and LV lines	
Directly attributable	2,569
Not directly attributable	
Total attributable to regulated service	2,569
Distribution and LV cables	
Directly attributable	45,279
Not directly attributable	
Total attributable to regulated service	45,279
Distribution substations and transformers	
Directly attributable	11,007
Not directly attributable	
Total attributable to regulated service	11,007
Distribution switchgear	
Directly attributable	7,176
Not directly attributable	
Total attributable to regulated service	7,176
Other network assets	
Directly attributable	3,491
Not directly attributable	
Total attributable to regulated service	3,491
Non-network assets	
Directly attributable	–
Not directly attributable	
Total attributable to regulated service	–
Regulated service asset value directly attributable	99,905
Regulated service asset value not directly attributable	–
Total closing RAB value	99,905

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

Change in asset value allocation 1			($000) CY-1	Current Year (CY)
Asset category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				

Change in asset value allocation 2			($000) CY-1	Current Year (CY)
Asset category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				

Change in asset value allocation 3			($000) CY-1	Current Year (CY)
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: Electricity Invercargill Limited
For Year Ended: 31 March 2022

SCHEDULE 5f: REPORT SUPPORTING COST ALLOCATIONS

This schedule requires additional detail on the asset allocation methodology applied in allocating asset values that are not directly attributable, to support the information provided in Schedule 5d (Cost allocations). This schedule is not required to be publicly disclosed, but must be disclosed to the Commission.
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	Line Item*	Allocation methodology type	Cost allocator	Allocator type	Allocator Metric (%)		Value allocated ($000)				OVABAA allocation increase ($000)
					Electricity distribution services	Non-electricity distribution services	Arm's length deduction	Electricity distribution services	Non-electricity distribution services	Total	
11	**Service interruptions and emergencies**										
12										-	
13										-	
14										-	
15										-	
16	Not directly attributable						-	-	-	-	-
17	**Vegetation management**										
18										-	
19										-	
20										-	
21										-	
22	Not directly attributable						-	-	-	-	-
23	**Routine and corrective maintenance and inspection**										
24										-	
25										-	
26										-	
27										-	
28	Not directly attributable						-	-	-	-	-
29	**Asset replacement and renewal**										
30										-	
31										-	
32										-	
33										-	
34	Not directly attributable						-	-	-	-	-
36	**System operations and network support**										
37										-	
38										-	
39										-	
40										-	
41	Not directly attributable						-	-	-	-	-
42	**Business support**										
43	Administration Expenses	ABAA	Revenue	Proxy	92.99%	7.01%		269	20	289	
44										-	
45										-	
46										-	
47	Not directly attributable						-	269	20	289	-
49	Operating costs not directly attributable						-	269	20	289	-
51	**Pass through and recoverable costs**										
52	**Pass through costs**										
53										-	
54										-	
55										-	
56										-	
57	Not directly attributable						-	-	-	-	-
58	**Recoverable costs**										
59										-	
60										-	
61										-	
62										-	
63	Not directly attributable						-	-	-	-	-

64 * include additional rows if needed

Company Name: Electricity Invercargill Limited
For Year Ended: 31 March 2022

SCHEDULE 5g: REPORT SUPPORTING ASSET ALLOCATIONS

This schedule requires additional detail on the asset allocation methodology applied in allocating asset values that are not directly attributable, to support the information provided in Schedule 5e (Report on Asset Allocations). This schedule is not required to be publicly disclosed, but must be disclosed to the Commission.
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	Line Item*	Allocation methodology type	Allocator	Allocator type	Allocator Metric (%)		Value allocated ($000)				OVABAA allocation increase ($000)
					Electricity distribution services	Non-electricity distribution services	Arm's length deduction	Electricity distribution services	Non-electricity distribution services	Total	
11	**Subtransmission lines**										
12										-	
13										-	
14										-	
15										-	
16	Not directly attributable						-	-	-	-	-
17	**Subtransmission cables**										
18										-	
19										-	
20										-	
21										-	
22	Not directly attributable						-	-	-	-	-
23	**Zone substations**										
24										-	
25										-	
26										-	
27										-	
28	Not directly attributable						-	-	-	-	-
29	**Distribution and LV lines**										
30										-	
31										-	
32										-	
33										-	
34	Not directly attributable						-	-	-	-	-
35	**Distribution and LV cables**										
36										-	
37										-	
38										-	
39										-	
40	Not directly attributable						-	-	-	-	-
41											
42	**Distribution substations and transformers**										
43										-	
44										-	
45										-	
46										-	
47	Not directly attributable						-	-	-	-	-
48											
49	**Distribution switchgear**										
50										-	
51										-	
52										-	
53										-	
54	Not directly attributable						-	-	-	-	-
55	**Other network assets**										
56										-	
57										-	
58										-	
59										-	
60	Not directly attributable						-	-	-	-	-
61	**Non-network assets**										
62										-	
63										-	
64										-	
65										-	
66	Not directly attributable						-	-	-	-	-
67											
68	Regulated service asset value not directly attributable						-	-	-	-	-
69	** include additional rows if needed*										

Company Name **Electricity Invercargill 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				
7		**6a(i): Expenditure on Assets**	**($000)**	**($000)**
8		Consumer connection		1,797
9		System growth		–
10		Asset replacement and renewal		3,643
11		Asset relocations		1,071
12		Reliability, safety and environment:		
13		Quality of supply	40	
14		Legislative and regulatory	–	
15		Other reliability, safety and environment	131	
16		**Total reliability, safety and environment**		171
17		**Expenditure on network assets**		6,681
18		Expenditure on non-network assets		–
19				
20		**Expenditure on assets**		6,681
21	*plus*	Cost of financing		
22	*less*	Value of capital contributions		927
23	*plus*	Value of vested assets		
24				
25		**Capital expenditure**		5,754
26		**6a(ii): Subcomponents of Expenditure on Assets (where known)**		**($000)**
27		Energy efficiency and demand side management, reduction of energy losses		
28		Overhead to underground conversion		
29		Research and development		
30		**6a(iii): Consumer Connection**		
31		*Consumer types defined by EDB**	**($000)**	**($000)**
32		20412 - New Subdivisions	290	
33		20413 - Customer Connections < 20 kVA	129	
34		20414 - Customer Connections 21 - 99 kVA	33	
35		20415 - Customer Connections > 100 kVA	1,345	
36				
37		** include additional rows if needed*		
38		**Consumer connection expenditure**		1,797
39				
40	*less*	Capital contributions funding consumer connection expenditure	440	
41		**Consumer connection less capital contributions**		1,357
42		**6a(iv): System Growth and Asset Replacement and Renewal**		**Asset Replacement**
43			**System Growth**	**and Renewal**
44			**($000)**	**($000)**
45		Subtransmission	–	–
46		Zone substations	–	1,667
47		Distribution and LV lines	–	170
48		Distribution and LV cables	–	971
49		Distribution substations and transformers	–	132
50		Distribution switchgear	–	703
51		Other network assets	–	–
52		**System growth and asset replacement and renewal expenditure**	–	3,643
53	*less*	Capital contributions funding system growth and asset replacement and renewal		3
54		**System growth and asset replacement and renewal less capital contributions**	–	3,640
55				
56		**6a(v): Asset Relocations**		
57		*Project or programme**	**($000)**	**($000)**
58		20477 - Undergrounding Programme - Stead St Stopbank	1,071	
59				
60				
61				
62				
63		** include additional rows if needed*		
64		All other projects or programmes - asset relocations		
65		**Asset relocations expenditure**		1,071
66	*less*	Capital contributions funding asset relocations	484	
67		**Asset relocations less capital contributions**		587

			($000)	($000)
68				
69		**6a(vi): Quality of Supply**		
70		*Project or programme**	($000)	($000)
71		20200 - Supply Quality Upgrades - City	13	
72		20215 - Fault Indicator Project	27	
73				
74				
75				
76		** include additional rows if needed*		
77		All other projects programmes - quality of supply		
78		**Quality of supply expenditure**		40
79	*less*	Capital contributions funding quality of supply		
80		**Quality of supply less capital contributions**		40
81		**6a(vii): Legislative and Regulatory**		
82		*Project or programme**	($000)	($000)
83		[Description of material project or programme]		
84		[Description of material project or programme]		
85		[Description of material project or programme]		
86		[Description of material project or programme]		
87		[Description of material project or programme]		
88		** include additional rows if needed*		
89		All other projects or programmes - legislative and regulatory		
90		**Legislative and regulatory expenditure**		–
91	*less*	Capital contributions funding legislative and regulatory		
92		**Legislative and regulatory less capital contributions**		–
93		**6a(viii): Other Reliability, Safety and Environment**		
94		*Project or programme**	($000)	($000)
95		20450 - Earth Upgrades - City	80	
96		20460 - Fibre Installation	27	
97		20461 - Earth Upgrades - Bluff	24	
98				
99				
100		** include additional rows if needed*		
101		All other projects or programmes - other reliability, safety and environment		
102		**Other reliability, safety and environment expenditure**		131
103	*less*	Capital contributions funding other reliability, safety and environment		
104		**Other reliability, safety and environment less capital contributions**		131
105				
106		**6a(ix): Non-Network Assets**		
107		**Routine expenditure**		
108		*Project or programme**	($000)	($000)
109		[Description of material project or programme]		
110		[Description of material project or programme]		
111		[Description of material project or programme]		
112		[Description of material project or programme]		
113		[Description of material project or programme]		
114		** include additional rows if needed*		
115		All other projects or programmes - routine expenditure		
116		**Routine expenditure**		–
117		**Atypical expenditure**		
118		*Project or programme**	($000)	($000)
119		[Description of material project or programme]		
120		[Description of material project or programme]		
121		[Description of material project or programme]		
122		[Description of material project or programme]		
123		[Description of material project or programme]		
124		** include additional rows if needed*		
125		All other projects or programmes - atypical expenditure		
126		**Atypical expenditure**		–
127				
128		**Expenditure on non-network assets**		–

Company Name	**Electricity Invercargill 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			
7	**6b(i): Operational Expenditure**	**($000)**	**($000)**
8	Service interruptions and emergencies	521	
9	Vegetation management		
10	Routine and corrective maintenance and inspection	965	
11	Asset replacement and renewal	346	
12	**Network opex**		1,832
13	System operations and network support	1,137	
14	Business support	2,161	
15	**Non-network opex**		3,297
16			
17	**Operational expenditure**		5,129
18	**6b(ii): Subcomponents of Operational Expenditure (where known)**		
19	Energy efficiency and demand side management, reduction of energy losses		63
20	Direct billing*		
21	Research and development		
22	Insurance		152
23	** Direct billing expenditure by suppliers that directly bill the majority of their consumers*		

Company Name	**Electricity Invercargill 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 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	**7(i): Revenue**	**Target ($000) [1]**	**Actual ($000)**	**% variance**
8	Line charge revenue	17,889	17,686	(1%)
9	**7(ii): Expenditure on Assets**	**Forecast ($000) [2]**	**Actual ($000)**	**% variance**
10	Consumer connection	929	1,797	93%
11	System growth		–	–
12	Asset replacement and renewal	3,099	3,643	18%
13	Asset relocations	727	1,071	47%
14	Reliability, safety and environment:			
15	Quality of supply	15	40	167%
16	Legislative and regulatory		–	–
17	Other reliability, safety and environment	384	131	(66%)
18	**Total reliability, safety and environment**	399	171	(57%)
19	**Expenditure on network assets**	5,154	6,681	30%
20	Expenditure on non-network assets		–	–
21	Expenditure on assets	5,154	6,681	30%
22	**7(iii): Operational Expenditure**			
23	Service interruptions and emergencies	530	521	(2%)
24	Vegetation management	4	–	(100%)
25	Routine and corrective maintenance and inspection	1,173	965	(18%)
26	Asset replacement and renewal	152	346	128%
27	**Network opex**	1,859	1,832	(1%)
28	System operations and network support	1,255	1,137	(9%)
29	Business support	2,181	2,161	(1%)
30	**Non-network opex**	3,436	3,297	(4%)
31	**Operational expenditure**	5,295	5,129	(3%)
32	**7(iv): Subcomponents of Expenditure on Assets (where known)**			
33	Energy efficiency and demand side management, reduction of energy losses		–	–
34	Overhead to underground conversion		–	–
35	Research and development		–	–
36				
37	**7(v): Subcomponents of Operational Expenditure (where known)**			
38	Energy efficiency and demand side management, reduction of energy losses	125	63	(50%)
39	Direct billing		–	–
40	Research and development		–	–
41	Insurance	149	152	2%
42				
43	*1 From the nominal dollar target revenue for the disclosure year disclosed under clause 2.4.3(3) of this determination*			
44	*2 From the CY+1 nominal dollar expenditure forecasts disclosed in accordance with clause 2.6.6 for the forecast period starting at the beginning of the disclosure year (the second to last disclosure of Schedules 11a and 11b)*			

Company Name	Electricity Invercargill Limited
For Year Ended	31 March 2022
Network / Sub-Network Name	

SCHEDULE 8: REPORT ON BILLED QUANTITIES AND LINE CHARGE REVENUES

This schedule requires the billed quantities and associated line charge revenues for each price category code used by the EDB in its pricing schedules. Information is also required on the number of ICPs that are included in each consumer group or price category code, and the energy delivered to these ICPs.

sch ref

8(i): Billed Quantities by Price Component

					Billed quantities by price component					
				Price component	Variable day energy sales	Variable day energy purchases				
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) / Unit charging basis (eg, days, kW of demand, kVA of capacity, etc.)	kWh	KWh				
Low user	Residential	Standard	6,409	41,138		32,399,917				
Domestic	Residential	Standard	8,992	91,701		71,044,027				
Non-Domestic	Commercial	Standard	1,918	47,234		36,560,065				
Individual non half hour	Commercial	Standard	45	6,423		4,972,078				
Individual half hour	Commercial	Standard	127	65,848	47,663,772					
Add extra rows for additional consumer groups or price category codes as necessary										
		Standard consumer totals	17,491	252,343	47,663,772	144,976,087	–	–	–	–
		Non-standard consumer totals	–	–	–	–	–	–	–	–
		Total for all consumers	17,491	252,343	47,663,772	144,976,087	–	–	–	–

Add extra columns for additional billed quantities by price component as necessary

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

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 foregone from posted discounts (if applicable)	Total distribution line charge revenue	Total transmission line charge revenue (if available)	Price component: Fixed Rate (eg, $ per day, $ per kWh, etc.): $/Day	Price component: Variable Rate: $/kWh				
Low user	Residential	Standard	$3,427		$2,465	$963	$254	$3,173				
Domestic	Residential	Standard	$7,174		$5,098	$2,076	$2,650	$4,523				
Non-Domestic	Commercial	Standard	$4,016		$2,888	$1,128	$1,688	$2,328				
Individual non half hour	Commercial	Standard	$394		$238	$156	$77	$317				
Individual half hour	Commercial	Standard	$2,675		$1,511	$1,164	$1,335	$1,339				
			–									
			–									
			–									
			–									
			–									
		Standard consumer totals	$17,686	–	$12,200	$5,486	$6,006	$11,680	–	–	–	–
		Non-standard consumer totals	–	–	–	–	–	–	–	–	–	–
		Total for all consumers	$17,686	–	$12,200	$5,486	$6,006	$11,680	–	–	–	–

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

Add extra columns for additional line charge revenues by price component as necessary

Check: OK

8(iii): Number of ICPs directly billed

Number of directly billed ICPs at year end	

Company Name	Electricity Invercargill Limited
For Year Ended	31 March 2022
Network / Sub-network Name	

SCHEDULE 9a: ASSET REGISTER

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

sch ref	Voltage	Asset category	Asset class	Units	Items at start of year (quantity)	Items at end of year (quantity)	Net change	Data accuracy (1–4)
8								
9	All	Overhead Line	Concrete poles / steel structure	No.	736	733	(3)	3
10	All	Overhead Line	Wood poles	No.	216	204	(12)	3
11	All	Overhead Line	Other pole types	No.	–	–	–	N/A
12	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	1	1	(0)	4
13	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	–	–	–	N/A
14	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	15	15	0	4
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	12	12	0	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	–	–	–	N/A
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.	5	5	–	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.	–	–	–	N/A
27	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	2	7	5	4
28	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	6	6	–	4
29	HV	Zone substation switchgear	33kV RMU	No.	–	–	–	N/A
30	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	6	8	2	4
31	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	–	–	–	N/A
32	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	40	51	11	4
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	–	–	–	N/A
34	HV	Zone Substation Transformer	Zone Substation Transformers	No.	6	7	1	4
35	HV	Distribution Line	Distribution OH Open Wire Conductor	km	23	22	(1)	3
36	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	–	–	–	N/A
37	HV	Distribution Line	SWER conductor	km	–	–	–	N/A
38	HV	Distribution Cable	Distribution UG XLPE or PVC	km	63	64	1	3
39	HV	Distribution Cable	Distribution UG PILC	km	96	96	(0)	3
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.	2	2	–	4
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	51	73	22	4
43	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	50	52	2	3
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	–	–	–	N/A
45	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	447	451	4	4
46	HV	Distribution Transformer	Pole Mounted Transformer	No.	9	10	1	4
47	HV	Distribution Transformer	Ground Mounted Transformer	No.	418	418	–	4
48	HV	Distribution Transformer	Voltage regulators	No.	–	–	–	N/A
49	HV	Distribution Substations	Ground Mounted Substation Housing	No.	41	41	–	3
50	LV	LV Line	LV OH Conductor	km	30	30	(0)	3
51	LV	LV Cable	LV UG Cable	km	424	424	0	3
52	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	168	170	2	2
53	LV	Connections	OH/UG consumer service connections	No.	17,845	17,932	87	4
54	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	160	175	15	4
55	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot	1	1	–	4
56	All	Capacitor Banks	Capacitors including controls	No	–	–	–	N/A
57	All	Load Control	Centralised plant	Lot	1	1	–	4
58	All	Load Control	Relays	No	–	–	–	N/A
59	All	Civils	Cable Tunnels	km	–	–	–	N/A

Company Name **Electricity Invercargill Limited**
For Year Ended **31 March 2022**
Network / Sub-network Name

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.

sch ref

8 **Disclosure Year (year ended)** 31 March 2022

Number of assets at disclosure year end by installation date

sch ref	Voltage	Asset category	Asset class	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	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	No. with age unknown	Items at end of year (quantity)	No. with default dates	Data accuracy (1–4)
9																																									
10	All	Overhead Line	Concrete poles / steel structure	No.	–	–	–	323	6	–	1	2	4	2	–	6	3	4	2	11	5	22	97	34	74	17	23	26	30	8	9	6	9	3	–	–	–	6	733		3
11	All	Overhead Line	Wood poles	No.	–	–	–	152	1	–	2	11	11	4	7	6	4	2	1	1	–	–	–	–	–	–	1	–	–	–	–	–	–	–	–	–	–	1	204		3
12	All	Overhead Line	Other pole types	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
13	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	–	–	–	–	0	–	–	1	0	–	–	–	–	–	–	–	–	–	–	–	–	–	0	–	–	–	–	–	–	–	–	–	–	0	1		4
14	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	–	–	–	–	–	5	1	4	–	–	–	–	–	–	–	0	–	–	–	–	–	–	5	–	–	–	–	–	–	–	–	–	–	–	15		4
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	–	–	–	5	7	–	0	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	12		4
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
18	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
22	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
23	HV	Subtransmission Cable	Subtransmission submarine cable	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
24	HV	Zone substation Buildings	Zone substations up to 66kV	No.	–	–	1	1	1	1	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1	–	–	–	–	–	–	–	–	–	–	–	5		4
25	HV	Zone substation Buildings	Zone substations 110kV+	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	0	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
26	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
27	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
28	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	–	–	–	–	–	–	–	–	–	2	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	5	–	–	–	–	–	7		4
29	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	–	–	–	–	1	–	1	–	–	–	–	–	–	1	–	–	–	–	–	–	–	–	3	–	–	–	–	–	–	–	–	–	–	–	6		4
30	HV	Zone substation switchgear	33kV RMU	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
31	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	–	–	–	–	–	–	–	3	5	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	8		4
32	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
33	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	–	–	–	–	11	11	–	3	–	–	1	–	–	–	–	–	–	–	–	–	–	1	16	–	–	–	–	5	3	–	–	–	–	–	51		4
34	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
35	HV	Zone Substation Transformer	Zone Substation Transformers	No.	–	–	–	1	2	1	–	–	–	1	–	–	–	–	–	–	–	–	–	–	1	–	1	–	–	–	–	–	–	–	–	–	–	–	7		4
36	HV	Distribution Line	Distribution OH Open Wire Conductor	km	0	–	0	11	4	2	3	1	–	–	–	–	–	–	–	–	–	0	–	–	–	–	–	1	0	–	–	–	–	–	–	–	–	0	22		3
37	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
38	HV	Distribution Line	SWER conductor	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
39	HV	Distribution Cable	Distribution UG XLPE or PVC	km	–	–	–	0	1	1	2	4	9	6	1	2	3	1	4	2	5	2	2	1	2	0	5	3	1	1	2	1	1	0	–	–	–	3	64		3
40	HV	Distribution Cable	Distribution UG PILC	km	0	–	0	13	23	32	18	3	2	–	0	0	1	–	0	2	–	–	–	0	1	0	0	–	0	–	0	–	–	–	–	–	–	0	96		3
41	HV	Distribution Cable	Distribution Submarine Cable	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
42	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	2	–	–	–	–	–	–	–	–	–	–	–	2		4
43	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	–	–	–	6	1	2	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	4	9	17	8	13	5	8	–	–	–	–	–	73		4
44	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	–	–	1	8	1	3	–	–	1	1	1	–	–	1	–	1	1	–	2	–	2	–	1	2	2	5	1	5	12	–	–	–	–	1	52		3
45	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
46	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	–	–	–	12	35	118	53	12	17	17	5	7	15	7	15	24	17	9	12	5	5	4	10	10	11	7	8	8	5	3	–	–	–	–	451		4
47	HV	Distribution Transformer	Pole Mounted Transformer	No.	–	–	1	2	1	–	–	–	1	1	–	–	–	1	–	1	1	–	–	–	–	–	–	–	–	–	–	–	1	–	–	–	–	–	10		4
48	HV	Distribution Transformer	Ground Mounted Transformer	No.	–	–	5	30	29	62	67	7	12	15	10	8	15	11	8	10	13	14	19	19	10	15	11	6	6	3	7	3	3	–	–	–	–	–	418		4
49	HV	Distribution Transformer	Voltage regulators	No.	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
50	HV	Distribution Substations	Ground Mounted Substation Housing	No.	–	–	1	9	2	14	5	1	2	–	1	–	1	1	1	–	–	–	2	–	–	–	–	–	–	–	1	–	–	–	–	–	–	–	41		3
51	LV	LV Line	LV OH Conductor	km	–	–	0	4	0	2	1	16	–	3	1	0	0	0	–	0	–	–	0	0	0	0	0	0	0	0	0	0	0	–	–	–	–	0	30		3
52	LV	LV Cable	LV UG Cable	km	1	–	9	47	73	111	64	12	16	21	3	10	6	9	4	7	6	3	5	2	1	1	2	3	4	2	2	0	1	0	–	–	–	1	424		3
53	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	2	0	1	15	4	22	89	19	2	1	0	0	1	1	1	2	1	1	1	0	2	1	0	1	0	0	0	0	1	–	–	–	–	2	170		2
54	LV	Connections	OH/UG consumer service connections	No.		3	114	2,224	3,966	3,596	5,462	40	54	60	198	259	279	201	211	130	100	104	97	84	57	63	74	85	62	53	68	73	80	–	–	–	–	135	17,932		4
55	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	–	–	–	3	31	39	1	4	–	–	1	–	–	–	–	–	–	–	–	–	–	2	33	12	5	5	10	17	12	–	–	–	–	–	175		4
56	All	SCADA and communications	SCADA and communications equipment operating as a single systen	Lot	–	–	–	–	–	–	–	–	–	–	–	1	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1		4
57	All	Capacitor Banks	Capacitors including controls	No	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
58	All	Load Control	Centralised plant	Lot	–	–	–	–	–	1	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1		4
59	All	Load Control	Relays	No	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A
60	All	Civils	Cable Tunnels	km	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–		N/A

Company Name	Electricity Invercargill Limited
For Year Ended	31 March 2022
Network / Sub-network Name	

SCHEDULE 9c: REPORT ON OVERHEAD LINES AND UNDERGROUND CABLES

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

sch ref

9				
10	**Circuit length by operating voltage (at year end)**	**Overhead (km)**	**Underground (km)**	**Total circuit length (km)**
11	> 66kV	–	–	–
12	50kV & 66kV	–	–	–
13	33kV	1	27	28
14	SWER (all SWER voltages)	–	–	–
15	22kV (other than SWER)	–	–	–
16	6.6kV to 11kV (inclusive—other than SWER)	22	160	181
17	Low voltage (< 1kV)	30	424	453
18	**Total circuit length (for supply)**	53	610	663
19				
20	Dedicated street lighting circuit length (km)	25	145	170
21	Circuit in sensitive areas (conservation areas, iwi territory etc) (km)			
22				
23	**Overhead circuit length by terrain (at year end)**	**Circuit length (km)**	**(% of total overhead length)**	
24	Urban	49	93%	
25	Rural	2	3%	
26	Remote only	–	–	
27	Rugged only	2	4%	
28	Remote and rugged	–	–	
29	Unallocated overhead lines	–	–	
30	**Total overhead length**	53	100%	
31				
32		**Circuit length (km)**	**(% of total circuit length)**	
33	Length of circuit within 10km of coastline or geothermal areas (where known)	663	100%	
34		**Circuit length (km)**	**(% of total overhead length)**	
35	Overhead circuit requiring vegetation management	4	8%	

Company Name **Electricity Invercargill 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			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

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

Company Name	**Electricity Invercargill Limited**
For Year Ended	**31 March 2022**
Network / Sub-network Name	

SCHEDULE 9e: REPORT ON NETWORK DEMAND

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

sch ref				
8	**9e(i): Consumer Connections**			
9	*Number of ICPs connected in year by consumer type*			
10	*Consumer types defined by EDB**	**Number of connections (ICPs)**		
11	Domestic	85		
12	Non Domestic	28		
13	Individual half hour	6		
14				
15				
16	** include additional rows if needed*			
17	**Connections total**	119		
18				
19	**Distributed generation**			
20	Number of connections made in year	6	**connections**	
21	Capacity of distributed generation installed in year	0.08	**MVA**	
22	**9e(ii): System Demand**			
23				
24				
25	**Maximum coincident system demand**	**Demand at time of maximum coincident demand (MW)**		
26	GXP demand	62		
27	*plus* Distributed generation output at HV and above	–		
28	**Maximum coincident system demand**	62		
29	*less* Net transfers to (from) other EDBs at HV and above	(1.8)		
30	**Demand on system for supply to consumers' connection points**	64		
31	**Electricity volumes carried**	**Energy (GWh)**		
32	Electricity supplied from GXPs	240		
33	*less* Electricity exports to GXPs			
34	*plus* Electricity supplied from distributed generation	0.3		
35	*less* Net electricity supplied to (from) other EDBs	(21)		
36	**Electricity entering system for supply to consumers' connection points**	261		
37	*less* Total energy delivered to ICPs	252		
38	**Electricity losses (loss ratio)**	8	3.2%	
39				
40	**Load factor**	0.47		
41	**9e(iii): Transformer Capacity**			
42		**(MVA)**		
43	Distribution transformer capacity (EDB owned)	156		
44	Distribution transformer capacity (Non-EDB owned, estimated)	2		
45	**Total distribution transformer capacity**	158		
46				
47	**Zone substation transformer capacity**	82		

Company Name	Electricity Invercargill Limited
For Year Ended	31 March 2022
Network / Sub-network Name	

SCHEDULE 10: REPORT ON NETWORK RELIABILITY

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

sch ref

8 **10(i): Interruptions**

sch ref	Interruptions by class	Number of interruptions
10	Class A (planned interruptions by Transpower)	–
11	Class B (planned interruptions on the network)	29
12	Class C (unplanned interruptions on the network)	37
13	Class D (unplanned interruptions by Transpower)	–
14	Class E (unplanned interruptions of EDB owned generation)	–
15	Class F (unplanned interruptions of generation owned by others)	–
16	Class G (unplanned interruptions caused by another disclosing entity)	2
17	Class H (planned interruptions caused by another disclosing entity)	–
18	Class I (interruptions caused by parties not included above)	–
19	**Total**	68.00
20		

sch ref	Interruption restoration	≤3Hrs	>3hrs
22	Class C interruptions restored within	23	16
23			

sch ref	SAIFI and SAIDI by class	SAIFI	SAIDI
25	Class A (planned interruptions by Transpower)	–	–
26	Class B (planned interruptions on the network)	0.11	28.18
27	Class C (unplanned interruptions on the network)	1.05	77.06
28	Class D (unplanned interruptions by Transpower)	–	–
29	Class E (unplanned interruptions of EDB owned generation)	–	–
30	Class F (unplanned interruptions of generation owned by others)	–	–
31	Class G (unplanned interruptions caused by another disclosing entity)	0.34	4.13
32	Class H (planned interruptions caused by another disclosing entity)	–	–
33	Class I (interruptions caused by parties not included above)	–	–
34	**Total**	1.49	109.37
35			

sch ref	Normalised SAIFI and SAIDI	Normalised SAIFI	Normalised SAIDI
37	Classes B & C (interruptions on the network)	1.15	105.24
38			

39 **10(ii): Class C Interruptions and Duration by Cause**

40

sch ref	Cause	SAIFI	SAIDI
42	Lightning	–	–
43	Vegetation	–	–
44	Adverse weather	0.01	0.06
45	Adverse environment	–	–
46	Third party interference	0.15	7.36
47	Wildlife	0.00	0.45
48	Human error	0.26	0.55
49	Defective equipment	0.62	68.37
50	Cause unknown	0.00	0.28
51			

52 **10(iii): Class B Interruptions and Duration by Main Equipment Involved**

53

sch ref	Main equipment involved	SAIFI	SAIDI
55	Subtransmission lines	–	–
56	Subtransmission cables	–	–
57	Subtransmission other	–	–
58	Distribution lines (excluding LV)	0.04	12.53
69	Distribution cables (excluding LV)	0.04	10.18
60	Distribution other (excluding LV)	0.03	5.48

61 **10(iv): Class C Interruptions and Duration by Main Equipment Involved**

62

sch ref	Main equipment involved	SAIFI	SAIDI
64	Subtransmission lines	–	–
65	Subtransmission cables	–	–
66	Subtransmission other	–	–
67	Distribution lines (excluding LV)	0.06	4.33
68	Distribution cables (excluding LV)	0.52	58.78
69	Distribution other (excluding LV)	0.47	13.94

70 **10(v): Fault Rate**

sch ref	Main equipment involved	Number of Faults	Circuit length (km)	Fault rate (faults per 100km)
72	Subtransmission lines	–	1	–
73	Subtransmission cables	–	27	–
74	Subtransmission other	2		
75	Distribution lines (excluding LV)	15	22	68.18
76	Distribution cables (excluding LV)	9	160	5.63
77	Distribution other (excluding LV)	13		
78	**Total**	39		

SCHEDULE 14 MANDATORY EXPLANATORY NOTES

1. This schedule requires EDBs to provide explanatory notes to information provided in accordance with clauses 2.3.1, 2.4.21, 2.4.22, and subclauses 2.5.1(1)(f),and 2.5.2(1)(e).

2. This schedule is mandatory—EDBs must provide the explanatory comment specified below, in accordance with clause 2.7.1. Information provided in boxes 1 to 11 of this schedule is part of the audited disclosure information, and so is subject to the assurance requirements specified in section 2.8.

3. Schedule 15 (Voluntary Explanatory Notes to Schedules) provides for EDBs to give additional explanation of disclosed information should they elect to do so.

- *Return on Investment (Schedule 2)*

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

Box 1: Explanatory comment on return on investment

Electricity Invercargill Limited achieved a post-tax ROI of 9.25% which is above the 75th percentile estimate of post-tax WACC of 4.2% and a 9.55% vanilla ROI which is above the 75th percentile estimate of vanilla WACC of 4.5%.

The increase in the post tax ROI of 3.6% from 2020/21 of 5.65% is due to the CPI increase to 6.93%, up from 1.52% in 2020/2021

No items were reclassified.

- *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: Explanatory comment on regulatory profit
Included in other regulated income is an amount of $51k for line charges and $3k for Fibre charges to another lines company.
No items were reclassified in the disclosure year.

- *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: Explanatory comment on merger and acquisition expenditure
There were no merger or acquisition expenses incurred in the disclosure year

- *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: Explanatory comment on the value of the regulatory asset based (rolled forward)
The calculation of the Regulatory Asset Base (RAB) was stated using the 31 March 2021 closing figure of $91,117k as a starting point with inflationary indexing over the year to 31 March 2022, plus additions less disposals. This resulted in a closing RAB balance of $99,905k.

No items were reclassified.

- *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 allowance: permanent differences

The expenditure deductible but not in regulatory profit is the $22k cost of easements which is a tax deductible expense. There is also $17k of non-deductible legal expenses.

There are no other permanent differences.

- *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: Tax effect of other temporary differences (current disclosure year)

Taxable Capital Contributions:	$	219
	$	219
Tax Rate:		28%
Temporary Differences	$	61

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: Cost allocation

With the exception of some Business support costs (which have been apportioned using the ABAA method via a revenue proxy cost allocator), all other costs are directly attributable as they were either passed through by PowerNet as agent or were invoiced to Electricity Invercargill Limited.

A proxy cost allocator is used as there is no direct relationship between not directly attributable business support costs and how they have been incurred.
No items were reclassified.

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: Commentary on asset allocation

All network assets are directly attributable.

No items were reclassified.

- *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: Explanation of capital expenditure for the disclosure year

The materiality threshold applied to identify programmes or projects during the disclosure year was $100k. Lower value projects with defined scope were included in the list for specific identification within categories.

No items were reclassified during the disclosure year.

- *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: Explanation of operational expenditure for the disclosure year

Reactive and minor maintenance is performed on Electricity Invercargill Limited's transformers and cables and this is classified as refurbishment and renewal maintenance when the work performed is not material in relation to the overall value of the asset.

No items were reclassified during the disclosure year.

There was no material atypical expenditure disclosed in Schedule 6b.

- *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: Explanatory comment on variance in actual to forecast expenditure

Capital Expenditure:

The actual expenditure on network assets was 30% above budget.

Consumer connection:

- Net 93% overspend due to the large CBD upgrade projects (CBD hotel, Mall and SIT Creative Centre) and increased small connections than planned along with significantly increased cost in material prices.

Asset replacement and renewal:

- Net 18% overspend due to LV cable replacements brought forward to minimise cost and coordinate work with the associated CBD development projects, additional spend on Southern substation upgrade project, increased spend on 11kV reactive cable replacement due to faults that occurred.

Asset Relocations:

- 47% overspend due to a change in timing of the project and increased scope of the Stead St Stopbank relocation works along with increased material costs.

Quality of Supply:

- 167% overspend was a result of deciding to install additional fault location indicators to improve the restoration times during faults. This was a recommendation of investigations into recent faults

Reliability, Safety and Environment:

- 66% underspend due to supply chain issues which restricted Pillar box lid replacements to critical work only. Earthing upgrades progressed with increased spend on Bluff earths however delay in CBD network fibre installs and Herbert St to Victoria Ave fibre install in conjunction with ICC Water Main Project.

Operational Expenditure:

Network opex was 3% below budget.

Service interruptions and emergencies:

- 2% underspend which is a minor variation in a reactive budget for fault response.

Vegetation management:

- A contingency budget and no work was identified

Routine and corrective maintenance and inspection:

- 18% underspend due to limited work identified from the inspection programme resulted in a lower spend (than planned) was required

Asset replacement and renewal:

- 128% overspend due to additional focus on RMU oil changes and RMU stand replacements and corrective maintenance following an RMU fault.

System Operations and Network Support:

- 9% underspend representing savings in Engineering and System Control fees.

Business Support:

- 1% underspend which is a minor variation representing $20k overspend in the year.

- *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: Explanatory comment relating to revenue for the disclosure year

Year ended 31 March 2022:

- Target revenue for the 2021-22 year was $17,889k. The total billed revenue for the 2021-22 year was $17686k, which is $203k below (1%).

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: Commentary on network reliability for the disclosure year

In accordance with the Issues Register for Electricity and Gas Information Disclosure (ID), issues 447 and 458, Electricity Invercargill Ltd (EIL) has calculated and disclosed normalised SAIDI and SAIFI consistent with the 2012 Electricity Distribution Business (EDB) ID Determination.

As a result EIL has disclosed a normalised SAIDI at 105.24 and normalised SAIFI at 1.15 for 2021/22. This compares with the 2020/21 year EIL published ID Determination values for normalised SAIDI of 49.67 and normalised SAIFI of 0.76 – meaning an increase in average interruption duration but an increase in the average frequency of interruptions compared with last year.

Class C (unplanned) interruption SAIDI increased from 35.9 to 77.1 minutes however the actual number of Class C interruptions only increased from 31 to 37.

The total number of power interruptions on EIL is higher than 2020/21 – with increases in both Class B (planned) and Class C interruptions. The number of interruptions exceeding 3 hours duration also increased.

The most significant cause of Class C interruptions was defective equipment (namely 11kV leads and failed cables) – which accounted for 89% of total Class C SAIDI and 60% of Class C SAIFI. EIL experienced a small number of Class C interruptions on the subtransmission network after experiencing none in 2020/21. The majority of Class C interruptions occurred on distribution cables, which represent the significant majority of equipment on the EIL network.

Due to the small footprint and underground nature of the EIL network, the probability of an interruption is relatively low. However, in the event of an interruption, the number of customers affected tends to be high as a percentage of the total customer base. This makes SAIDI and SAIFI difficult to predict in any given year.

This information has been prepared on a basis consistent with the previous year's disclosure and EIL has recorded successive interruptions, originating from the same cause, as single transaction.

- *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;

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: Explanation of insurance cover

Electricity Invercargill Limited insures its substations, network equipment and buildings.

- Substations and network equipment are insured for $30.8 million.

Lines and cables are not insured. Electricity Invercargill Limited therefore "self-insures" its lines and cables but does not recognise the cost of self-insurance.

Amendments to previously disclosed information

18. In the box below, provide information about amendments to previously disclosed information disclosed 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

No amendments were disclosed.

SCHEDULE 14A MANDATORY EXPLANATORY NOTES ON FORECAST

(In this Schedule, clause references are to the Electricity Distribution Information Disclosure Determination 2012 – as amended and consolidated 3 April 2018.)

1. This Schedule requires EDBs to provide explanatory notes to reports prepared in accordance with clause 2.6.6.

2. This Schedule is mandatory—EDBs must provide the explanatory comment specified below, in accordance with clause 2.7.2. This information is not part of the audited disclosure information, and so is not subject to the assurance requirements specified in section 2.8.

Commentary on difference between nominal and constant price capital expenditure forecasts (Schedule 11a)

3. In the box below, comment on the difference between nominal and constant price capital expenditure for the current disclosure year and 10 year planning period, as disclosed in Schedule 11a.

Box 1: Commentary on difference between nominal and constant price capital expenditure forecasts
Inflationary assumptions were used to calculate the nominal prices in the forecast.

Commentary on difference between nominal and constant price operational expenditure forecasts (Schedule 11b)

4. In the box below, comment on the difference between nominal and constant price operational expenditure for the current disclosure year and 10 year planning period, as disclosed in Schedule 11b.

Box 2: Commentary on difference between nominal and constant price operational expenditure forecasts
Nominal Prices are based on publicly available New Zealand Treasury's economic forecast indicated in the Half Year Economic Fiscal Update (HYEFU) report released in December 2020:

	2022	2023	2024	2025	2026
Inflator (CAPEX & OPEX)	1.2%	1.4%	1.8%	2.1%	2.1%

Forecasts are in line with the business plan projections and explanations outlined in the Asset Management Plan.

Schedule 15 Voluntary Explanatory Notes

(In this Schedule, clause references are to the Electricity Distribution Information Disclosure Determination 2012 – as amended and consolidated 3 April 2018.)

5. This schedule enables EDBs to provide, should they wish to-

   5.1 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;

   5.2 information on any substantial changes to information disclosed in relation to a prior disclosure year, as a result of final wash-ups.

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.

6. Provide additional explanatory comment in the box below.

Box 1: Voluntary explanatory comment on disclosed information

Schedule 10

Network reliability is compliant with quality requirements under DPP3, however due to the manual nature of the outage reporting process, there are inherent limitations in the ability of OJV to collect and record the network reliability information required to be disclosed in Schedule 10 (i) to 10 (iv). There is currently no independent evidence to support the accuracy of installation control points ('ICP's') affected by an interruption, impacting the completeness and accuracy of ICP data included in the SAIDI and SAIFI outage statistics.

A number of actions and initiatives are being taken to overcome limitations, including roll out and/or access to smart meter data, strengthening of processes relating to the recording of outages from the outage system, and retention of documentation.

The information has been prepared on a basis consistent with the previous year's disclosure and EIL has recorded successive interruptions, originating from the same cause, as single interruptions.

4. APPENDIX - Related Party Transaction: Additional Information Disclosure

4.1 INTRODUCTION

For the purpose of meeting the 2021 Related Party Transaction reporting requirements, in accordance with section 2.3.6 of the Electricity Information Disclosure Determination 2012, (Consolidated in 2018), issued 3 April 2018.

The following information is provided in reference to and support of:

- **Electricity Invercargill Limited's 2022 Information Disclosure**, for the year ended 31 March 2022 - Schedule 5(b) Related Party Transactions

4.2 INFORMATION DISCLOSURE REQUIREMENTS

The Related Party Transaction information disclosed on the following pages has been prepared in accordance with **Limited Disclosure** requirements, due to the level of expenditure incurred by Electricity Invercargill Limited (EIL) being less than $20 million, for the year ending 31 March 2022.

Limited Disclosure requires additional information be provided associated with related party transactions, limited to details of related party relationships and nature of work undertaken.

This information is also subject to the Information Disclosure assurance opinion and Director Certification.

4.3 RELATED PARTY RELATIONSHIPS

Electricity Invercargill Limited (EIL) has an interest in PowerNet Limited, the OtagoNet Joint Venture, Lakeland Network Limited, and the Southern Generation Limited Partnership through their wholly owned subsidiary company Pylon Limited.

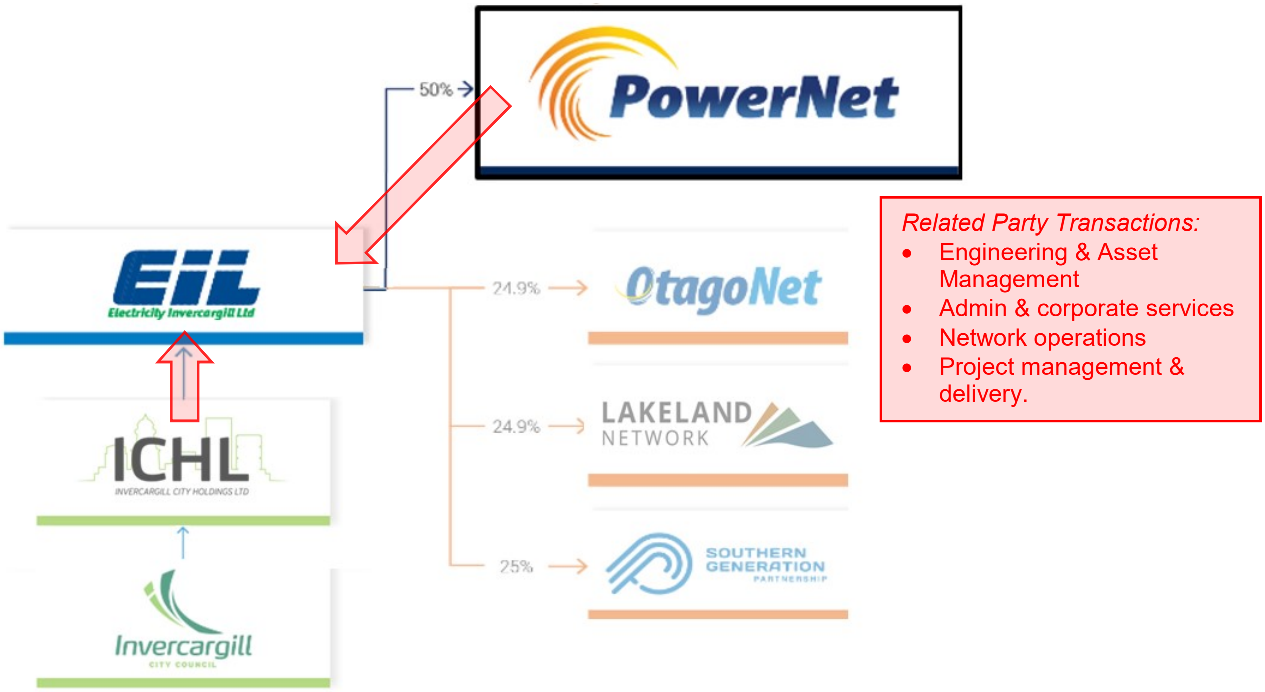
During the year ending 31 March 2022, EIL had related party transactions with the following entities:

- Goods and services provided by – PowerNet Limited; Invercargill City Holdings Limited

The transactions between EIL and PowerNet are subject to Related Party Transaction reporting.

<u>Company Structure</u>

Electricity Invercargill Limited (EIL) is wholly-owned by the Invercargill City Council through its subsidiary company Invercargill City Holdings Limited. The following diagram illustrates EIL's ownership interests in PowerNet and other related entities in the EIL Group, and the nature of related party transaction work undertaken.



a. **PowerNet Limited**

EIL holds a 50% shareholding in electricity network management company PowerNet Limited. PowerNet provides a range of field contracting, asset management, system control and finance and commercial services to EIL. The value of the related party transactions for the year ended 31 March 2022 is categorised as follows:

		($'000)
Operating Expenditure:		
i.	Service interruptions and emergencies	521
ii.	Routine and corrective maintenance and inspection	965
iii.	Asset replacement and renewal (opex)	346
iv.	Business support	1,556
v.	System operations and network support	378
Capital Expenditure		
i.	Consumer Connection	1,796
ii.	Asset replacement and renewal (capex)	3,643
iii.	Asset relocations	1,071
iv.	Quality of supply	40
v.	Other reliability, safety and environment	131
Total Related Party expenditure from PowerNet		**10,447**

In the year to 31 March 2022, PowerNet provided 100% of the EIL Lines Business Capital Expenditure, and 73% of all Operating Expenditure. The high percentage of related party transactions relative to total expenditure is due to PowerNet operating under a Network Management Agreement (NMA) with EIL, in the form of an "agency agreement".

Services provided under the agreement include:

- Electricity distribution field services
- System control services
- Project management of capital and maintenance work
- Faults restoration and stand by (on call) arrangements
- Asset management for EDB and meters,
- Heath, Safety and Environment management
- Business support, IT support and human resources
- Corporate, finance and commercial services

b. Invercargill City Holdings Limited

EIL is owned 100% by Invercargill City Holdings Limited (ICHL). The role of ICHL is to provide governance, funding and treasury support to the subsidiary companies they own.
The value of the related party transactions between ICHL and EIL for the year ended 31 March 2022 is categorised as follows:

	($'000)
Operating Expenditure:	
i. Business support	154
Total Related Party expenditure from ICHL	**154**

In the year to 31 March 2022, ICHL provided 3% of all Operating Expenditure, relating to management fees.

Network Management Agreement

EIL incurs 100% of its capital expenditure and a high percentage of its operating costs for its electricity distribution and meter businesses from PowerNet, in accordance with the explicit terms and conditions of the PowerNet Network Management Agreement (NMA).

While EIL owns the Network Assets and provides Line Function Services in Invercargill city and the Bluff township area, under the agreement PowerNet will manage the network assets, have right to carry out an agreed Capital Works programme, have the exclusive right to provide Line Function Services, and have the right to provide the business administration services on behalf of EIL.

PowerNet was established in 1994 to extract operational efficiencies from the merger of field work management, asset management and office based functions performed by EIL and The Power Company Limited (TPCL). In 1993, there were two autonomous Lines Companies in Southland (EIL and TPCL). Each had a separate staff, management and Board of Directors, and each had a different ownership structure. Directors of both companies recognised there would be significant economies of scale benefits if there were a single Lines company covering the area. Due to different ownership a single Lines company was not possible, however a single network management entity was a viable option.

The ongoing drive for efficiency by merging operations and achieving scale was recently identified by the Government Pricing Review and the terms of reference required investigation into the "PowerNet model" as the review looked at how other EDBs could potentially do the same.

PowerNet charges Agency Fees to the EDB's and metering businesses it manages under the NMA's. These charges recover costs incurred in the performance of the system control services, asset management, corporate, finance and commercial services.

These costs are charged to customers based on a cost allocation methodology applied within PowerNet. The allocation is based on various allocation drivers, including field operating orders, staff numbers, EDB asset size, EDB customers and a departmental assessment of indirect labour time splits. The allocation forms the basis of costs recovered from:

- the agency fee to be charged to the EDB's and metering businesses and
- the capital mark-up to recover costs allocated to EDB and meter capital projects

An independent review in 2018 of the allocation methodology ensured all parties that are charged agency and other fees by PowerNet are treated consistently and appropriately for each party.

Arm's Length Requirement

EIL believes the related party work performed by PowerNet is performed on an 'arm's-length' basis as if EIL and PowerNet were acting as willing buyer and willing seller, acting with independence and in pursuit of their own interests.

This view is based on the following reasons and best intent:

- Cost efficiencies and operating efficiencies generated from economies of scale;
- Cost efficiencies gained through supplier agreements eg Corys Electrical supply agreement with pricing mechanisms ensuring prices are maintained at a market competitive level;
- Separate entities operating with clear separation of duties and responsibilities;
- Two independent EDB entities with independent Directors acting in the best interests of their own business, owning and governing PowerNet;
- Relative labour costs benchmarking closely (+/-15%) within the average of alternate external supplier rates provided over the past two years;
- Market testing through tendering processes;
- External non-network customer work being awarded to PowerNet based on the same internal rates as charged to the EDB customers;
- Large percentage of Works Programme costs charged to EIL (over 50% of Capital and Maintenance work combined) are sourced from external suppliers, on a traditional arm's length transaction basis;
- Transparency of cost allocation process and mark-up rate agreed between the PowerNet EDB customers;
- Independent assessments of PowerNet performance and rates charged to EIL, providing favourable outcomes.

Independent Assurance Report

To the Directors of Electricity Invercargill 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 (Consolidated 9 December 2021)

The Electricity Invercargill Limited (the Company) is required to disclose certain information under the Electricity Distribution Information Disclosure Determination 2012 (consolidated 9 December 2021) (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, Elizabeth Adriana (Adri) Smit, using the staff and resources of PricewaterhouseCoopers, 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.
- the related party transactions information disclosed in Appendix A, in accordance with Clause 2.3.6 of the Determination and clauses 2.2.11(1)(g) and 2.2.11(5) of the Electricity Distribution Services Input Methodologies Determination 2012 (consolidated 20 May 2020) (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 2.11.1 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.

Qualified Opinion

In our opinion, except for the possible effect of the matter described in the Basis for Qualified Opinion section of our report, 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, with the Determination; and
- the basis for valuation of related party transactions complies with the Determination and the IM Determination.

Basis for Qualified Opinion

As described in Box 1 of Schedule 15, there are inherent limitations in the ability of the Company to collect and record the network reliability information, specifically the interconnection points ('ICP's') affected by an interruption and the duration of the interruption, used in calculating the amounts required to be disclosed in Schedules 10(i) to 10(iv). Consequently, there is no independent evidence available to support the accuracy of the ICP's affected and duration of an interruption. Controls over the accuracy of ICP and interruption data included in the SAIDI and SAIFI outage statistics was limited throughout the year.

There are no practical audit procedures that we could adopt to independently confirm the accuracy of the ICP data used to record the number of ICP's affected and duration of the interruption for the purposes of inclusion in the amounts relating to SAIDI and SAIFI outage statistics set out in Schedules 10(i) to 10(iv). Because of the potential effect of the limitations described above, we are unable to form an opinion as to the accuracy of the data that forms the basis of the compilation of Schedules 10(i) to 10(iv). In this respect alone we have not obtained all the recorded evidence and explanations that we have required.

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 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 all the information and explanations we have required to provide a basis for our qualified 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. In addition to the matter described in the Basis of Qualified Opinion section of our report, we have determined the matters described below to be Key Assurance Matters.

Key Assurance Matter	How our procedures addressed the key assurance matter
Regulatory asset base The Regulatory Asset Base (RAB), as set out in Schedule 4, reflects the value of the Company's electricity distribution assets. These are valued using an indexed historic cost methodology prescribed by the Determination. It is a measure which is used widely and is key to measuring the Company's return on investment and therefore important when monitoring financial performance or setting electricity distribution prices. The RAB inputs, as set out in the IM Determination, are similar to those used in the measurement of fixed assets in the financial statements, however, there are a number of different requirements and complexities which require careful consideration. Due to the importance of the RAB within the regulatory regime, the incentives to overstate the RAB value, and complexities within the regulations, we have considered it to be a key area of focus.	We have obtained an understanding of the compliance requirements relevant to the RAB as set out in the Determination and the IM Determination. Our procedures included the following: **Assets commissioned** ● We reconciled the assets commissioned, as per the regulatory fixed asset register, to the asset additions disclosed in the audited annual financial statements and investigated any reconciling items; ● We inspected the assets commissioned during the period, as per the regulatory fixed asset register, to identify any specific cost or asset type exclusions, as set out in the Determination, which are required to be removed from the RAB; ● We tested a sample of assets commissioned during the disclosure period for appropriate asset category classification; **Depreciation** ● We compared the standard asset lives by asset category to those set out in the IM Determination; ● We verified the spreadsheet formula utilised to calculate regulatory depreciation expense is in line with IM Determination clause 2.2.5;

Key Assurance Matter	How our procedures addressed the key assurance matter
	Revaluation ● We recalculated the revaluation rate set out in the IMs using the relevant Consumer Price Index indices taken from the Statistics New Zealand website; ● We tested the mathematical accuracy of the revaluation calculation performed by management; **Disposals** ● We inspected the asset disposals within the accounting fixed asset register to ensure disposals in the RAB meet the definition of a disposal per the IM Determination.
Related party transactions Disclosures over related party transactions as required under the Determination and the IM Determination are set out in Appendix A. The Determination and the IM Determination require the Company to value its transactions with related parties, disclosed in Schedule 5b, in accordance with the principles-based approach to the arm's length valuation rule. This rule states that the value of goods or services acquired from a related party cannot be greater than if it had been acquired under the terms of an arm's length transaction with an unrelated party, nor may it exceed the actual cost to the related party. A sale or supply to a related party cannot be valued at an amount less than if it had been sold or supplied under the terms of an arm's-length transaction with an unrelated party. Arm's-length valuation, as defined in the IM Determination, is the value at which a transaction, with the same terms and conditions, would be entered into between a willing seller and a willing buyer who are unrelated and who are acting independently of each other and pursuing their own best interests. The Company is required to use an objective and independent measure to demonstrate compliance with the arm's-length principle.	We have obtained an understanding of the compliance requirements relevant to related party transactions as set out in the Determination and the IM Determination. We have ensured Schedule 5(b) and Appendix A includes all required disclosures as appropriate for an EDB required to make limited disclosure. Our procedures over Schedule 5(b) and Appendix A included the following:. **Completeness and accuracy of related party relationships and transactions** We have tested the completeness and accuracy of the related party relationships and transactions by: ● Agreeing the disclosures within Schedule 5(b) to the audited financial statements for the year ended 31 March 2022 and to the accounting records, investigating any differences and determining whether any such differences are justified; and ● Applying our understanding of the business structure against the related party definition in IM Determination clause 1.1.4(2)(b) to assess management's identification of any "unregulated parts" of the entity. **Arm's length valuation rule** We obtained the Company's assessment of the available independent and objective measures used in supporting the arm's length valuation principle and performed the following procedures: ● Re-performed the calculations and agreed key inputs and assumptions to supporting documentation; ● Where benchmarking or other market information was used as independent and objective measures, we assessed whether the related party transaction values fell within an acceptable range. Qualitative factors were considered in determining the apple range.

Key Assurance Matter	How our procedures addressed the key assurance matter
In the absence of an active market for similar transactions, assigning an objective arm's length value to a related party transaction is difficult and requires significant judgement. We have identified related party transactions at arm's-length as a key audit matter due to the judgement involved	

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, in all material aspects:

- 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, with the Determination in preparing the audited Disclosure Information; and
- the Company's basis for valuation of related party transactions in the disclosure year has complied, 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 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 PricewaterhouseCoopers and its partners and employees* may deal with the Company on normal terms within the ordinary course of trading activities of the Company. Other than any dealings on normal terms within the ordinary course of trading activities of the Company, this engagement, the assurance engagement on the 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.

Elizabeth Adriana (Adri) Smit
PricewaterhouseCoopers

On behalf of the Auditor-General
Christchurch, New Zealand
25 August 2022

6. DIRECTORS' CERTIFICATE

Schedule 18: Certification for Year-End Disclosures

Clause 2.9.2

We, Robert Datema Jamieson and Paul Michael Kiesanowski, being directors of Electricity Invercargill 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 the Electricity Invercargill 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.

Robert Datema Jamieson **Paul Michael Kiesanowski**

25 August 2022

Footnote:
The Directors of Electricity Invercargill Limited (EIL) note the amendment in respect to the Information Disclosure Exemption: Disclosure and auditing or reliability information within schedule 10, issued by the Commerce Commission on 17 May 2021 that has removed the auditor report requirements relating to the treatment of successive interruptions for reporting SAIDI, SAIFI, and interruptions, because of potential inconsistencies in treatment approaches across the industry.

Directors note that they do not appear to have been provided a similar exemption relating to treatment of successive interruptions regarding their certification. The information has been prepared on a basis consistent with the previous year's disclosure and Electricity Invercargill Limited has recorded successive interruptions, originating from the same cause, as single interruptions.