



**DS5001**

**Unison's Default Price-Quality Path**

**Annual Compliance Statement**

**2023-24**

**For the assessment period ended 31 March 2024**

Pursuant to  
Electricity Distribution Services Default Price-Quality Path Determination 2020

Data Classification: Public  
Published Date: 29/08/2024

# DS5001 Unison's Default Price Quality-Path Annual Compliance Statement 2023-24

## Overview

### Intended audience

This annual compliance statement is published in accordance with clause 11.4 of the 2020 Default Price-Quality Path Determination. It applies to the fourth assessment period commencing 1 April 2023 and ending 31 March 2024.

### Document contributors

Contributors	Name and Position Title	Approval Date
Owner	Grant Sargison Pricing Manager	12/08/2024
Authoriser	Rachael Balasingam Regulatory Manager	13/08/2024
Approver	Jason Larkin General Manager Commercial and Regulatory	29/08/2024

### Key dates

**Published Date** 29/08/2024

### Disclaimer

The information presented in this Annual Compliance Statement has been prepared solely for the purpose of complying with the requirements of the Electricity Distribution Services Default Price-Quality Path Determination 2020. This statement has not been prepared for any other purpose. Unison Networks Limited expressly disclaims any liability to any other party who may rely on this statement for any other purpose.

**Certification  
of Annual  
Compliance  
Statement**

Certificate to be placed here.



**SCHEDULE 7: FORM OF DIRECTOR'S CERTIFICATE FOR ANNUAL COMPLIANCE  
STATEMENT**

Clause 11.5(d)

We, Robert Wheeler and Dan Druzianic, being directors of Unison Networks Limited certify that, having made all reasonable enquiry, to the best of our knowledge and belief, the attached annual compliance statement of Unison Networks Limited, and related information, prepared for the purposes of the *Electricity Distribution Services Default Price-Quality Path Determination 2020* has been prepared in accordance with all the relevant requirements.

Robert Wheeler, Deputy Chair

Date: 22 August, 2024

Dan Druzianic, Director

Date: 22 August, 2024

Note: Section 103(2) of the Commerce Act 1986 provides that no person shall attempt to deceive or knowingly mislead the Commission in relation to any matter before it. It is an offence to contravene section 103(2) and any person who does so is liable on summary conviction to a fine not exceeding \$100,000 in the case of an individual or \$300,000 in the case of a body corporate.

**Referenced Legislation** • Electricity Distribution Services Default Price-Quality Path Determination 2020 (the Determination)

**Clarification** Clarification of any matter referred to in this document should be directed to:

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# 1 Wash-up Amount

## 1.1 Statement of Compliance

As demonstrated in *point 1.2*, Table 1, and consistent with clause 8.6 of the Determination, Unison has complied with the wash-up amount calculation for the fourth assessment period.

## 1.2 Wash-up amount calculation

Wash-up Amount RY24		
Term	Description	Value (\$000)
Actual allowable revenue (AAR)	<i>Actual net allowable revenue Plus: actual pass-through costs Plus: actual recoverable costs</i>	162,600
Actual revenue (AR)	<i>Sum of actual revenue from prices plus other regulated income</i>	147,340
Revenue foregone (RV)	<i>Actual net allowable revenue x (revenue reduction percentage – 20%) when revenue reduction percentage is greater than 20%, otherwise nil</i>	0
<b>Wash-up amount</b>	<i>AAR - AR - RV</i>	<b>15,260</b>

**Table 1 – Wash-up Amount Calculation**

## 1.3 Actual allowable revenue (AAR)

Actual Allowable Revenue RY24		
Term	Description	Value (\$000)
Actual net allowable revenue (ANAR) RY24	<i>Actual net allowable revenue for the fourth assessment period</i>	119,393
Actual pass-through costs	<i>Sum of all pass-through costs that were incurred or approved by the Commission in the assessment period</i>	1,610
Actual recoverable costs	<i>Sum of all recoverable costs that were incurred or approved by the Commission in the assessment period</i>	33,708
Revenue wash-up draw down	<i>The 'opening wash-up account balance' from the third assessment period</i>	7,890
<b>Total actual allowable revenue (AAR)</b>	<i>Actual net allowable revenue + actual pass-through costs and actual recoverable costs</i>	<b>162,600</b>

**Table 2 – Actual Allowable Revenue**

**1.4 Actual net allowable revenue (ANAR)**

<b>Actual Net Allowable Revenue RY24</b>		
Term	Description	Value (\$000)
Actual net allowable revenue RY23	<i>Actual net allowable revenue from previous assessment period</i>	113,626
$\Delta$ CPI <sub>2024</sub>	<i>Change in Consumer Price Index</i>	5.08%
Annual rate of change	<i>The rate of change stipulated in Schedule 1.2</i>	0
Actual net allowable revenue RY24 (ANAR)	<i>Actual net allowable revenue for the fourth assessment period</i>	<b>119,393</b>

**Table 3 – Actual Net Allowable Revenue**

*Appendix B* contains further information supporting actual revenue from prices.

**1.5 Actual revenue (AR)**

<b>Actual Revenue RY24</b>		
Term	Description	Value (\$000)
Actual revenue from prices	<i>Actual prices between 1 April 2023 and 31 March 2024 multiplied by actual quantities for the assessment period</i>	145,529
Other regulated income	<i>Other income associated with supply of electricity distribution services</i>	1,811
<b>Total actual revenue (AR)</b>	<i>Sum of actual revenue from prices plus other regulated income</i>	<b>147,340</b>

**Table 4 – Actual Revenue**

*Appendix B* contains further information supporting actual revenue from prices.

**1.6 Revenue foregone (RV)** Table 5 shows the revenue foregone consistent with clause 4.2 of the Determination.

Revenue Foregone RY24		
Term	Description	Value (\$000)
Actual net allowable revenue (ANAR)	<i>Amount specified as actual net allowable revenue</i>	119,393
Revenue reduction percentage (RRP)	<i>1 - (actual revenue from prices / forecast revenue from prices)</i>	2.84%
<b>Revenue foregone (RV)</b>	<i>Actual net allowable revenue x (RRP - 20%) when RRP is greater than 20%, otherwise nil</i>	<b>0</b>

**Table 5 – Revenue Foregone**

## 2 Quality Standards

### 2.1 Compliance with planned interruptions quality standards

Unison is subject to a planned accumulated SAIDI limit and a planned accumulated SAIFI limit. These limits are assessed for the DPP regulatory period as stated in clause 9.2 of the Determination.

Tables 6 and 7 show the:

- planned accumulated SAIDI and SAIFI limits for Unison for the DPP regulatory period, and
- planned SAIDI and SAIFI assessed values for the fourth assessment period.

<b>Planned Interruptions Quality Standard – SAIDI</b>	
Sum of planned SAIDI assessed values ≤ Planned accumulated SAIDI limit	
Planned accumulated SAIDI limit	625.79
Planned SAIDI assessed value for the first four assessment periods	265.07
<b>Compliance result</b>	<b>Compliant</b>

**Table 6 – SAIDI Planned Compliance**

<b>Planned Interruptions Quality Standard – SAIFI</b>	
Sum of planned SAIFI assessed values ≤ Planned accumulated SAIFI limit	
Planned accumulated SAIFI limit	4.4649
Planned SAIFI assessed value for the first four assessment periods	2.2376
<b>Compliance result</b>	<b>Compliant</b>

**Table 7 – SAIFI Planned Compliance**



**2.2 Planned SAIDI and SAIFI assessed values**

Tables 8 and 9 show Unison's planned SAIDI and SAIFI assessed values for the assessment period.

<b>Planned SAIDI Assessed Value RY24</b>		
Term	Description	Value
Class B non-notified interruptions		3.48
Class B notified interruptions falling outside window		9.89
SAIDI <sub>B</sub>	<i>Sum of Class B non-notified interruptions</i>	13.37
Class B notified interruptions falling inside window		107.43
Class B intended interruptions cancelled without notice		13.08
Class B intended interruptions cancelled with notice		-
SAIDI <sub>N</sub>	<i>Sum of Class B notified interruptions</i>	120.51
Planned SAIDI assessed value	<i>SAIDI<sub>B</sub> + (SAIDI<sub>N</sub>/2)</i>	73.62

**Table 8 – Planned SAIDI Assessment**

<b>Planned SAIFI Assessed Value RY24</b>		
Term	Description	Value
Planned SAIFI assessed value	<i>Sum of Class B interruptions commencing within the assessment period</i>	0.5951

**Table 9 – Planned SAIFI Assessment**

**2.3  
Compliance  
with  
unplanned  
interruptions  
quality  
standards**

As demonstrated in Tables 10 and 11, and consistent with clause 9.7 of the Determination, Unison has complied with the unplanned interruptions quality standard.

<b>Unplanned Interruptions Quality Standard RY24 – SAIDI</b>		
<b>Unplanned SAIDI assessed value ≤ Unplanned SAIDI limit</b>		
Unplanned SAIDI limit		82.34
Unplanned SAIDI assessed value	<i>Sum of normalised SAIDI values for Class C interruptions commencing within the assessment period</i>	70.19
<b>Compliance result</b>		<b>Compliant</b>

**Table 10 – SAIDI Unplanned Compliance**

<b>Unplanned Interruptions Quality Standard RY24 – SAIFI</b>		
<b>Unplanned SAIFI assessed value ≤ Unplanned SAIFI limit</b>		
Unplanned SAIFI limit		1.8152
Unplanned SAIFI assessed value	<i>Sum of normalised SAIFI values for Class C interruptions commencing within the assessment period</i>	1.5339
<b>Compliance result</b>		<b>Compliant</b>

**Table 11 – SAIFI Unplanned Compliance**

*Appendix C* provides information about policies, procedures and calculations for measuring planned and unplanned interruptions during the assessment period.

**2.4 Major events**

Tables 12 and 13 show the SAIDI and SAIFI values attributed to major events which occurred during the assessment period. The unplanned SAIDI and unplanned SAIFI boundary values for these major events are 4.48 and 0.0735 respectively. These values are taken from the Determination, Schedule 3.2.

Unplanned SAIDI Major Events RY24			
Start	End	Pre-normalised Unplanned SAIDI	Normalised Unplanned SAIDI
16/09/2023 8:00 pm	18/09/2023 10:00 pm	12.28	1.32
1/02/2024 10:30 pm	3/02/2024 4:00 pm	5.72	1.22

**Table 12 – SAIDI Unplanned Major Events**

Unplanned SAIFI Major Events RY24			
Start	End	Pre-normalised Unplanned SAIFI	Normalised Unplanned SAIFI

**Table 13 – SAIFI Unplanned Major Events**

*Appendix D* provides further information on major events.

**2.5 Compliance with extreme event standards**

As demonstrated in Table 14, and consistent with clause 9.9 Determination, Unison has complied with the extreme event standard.

Extreme Event Standard RY24	
<i>Unplanned SAIDI value ≤ 120 minutes, and customer interruption minutes ≤ six million during any 24-hour period, excluding unplanned interruptions from major external factors</i>	
Number of Extreme Events	Compliance Result
0	<b>Compliant</b>

**Table 14 – Extreme Event Compliance**

**2.6 Quality incentive adjustment**

Table 15 shows Unison's quality incentive adjustment for the assessment period.

<b>Quality Incentive Adjustment RY24</b>		
Term	Description	Value (\$000)
SAIDI planned adjustment	$(SAIDI_{planned, target} - SAIDI_{planned, assessed}) \times 0.5 \times IR$	(258.16)
SAIDI unplanned adjustment	$(SAIDI_{unplanned, target} - SAIDI_{unplanned, assessed}) \times IR$	(38.51)
Total adjustment	<i>SAIDI planned adjustment + SAIDI unplanned adjustment</i>	(296.67)
Revenue at risk	$0.02 * ANAR$	2,387.86
Total penalty/reward		(296.67)
67th percentile estimate of post-tax WACC		4.23%
Quality incentive adjustment		<b>(322.30)</b>

**Table 15 – Quality Incentive Adjustment**

Table 16 shows Unison's quality incentive adjustment inputs consistent with Schedule 4 of the Determination.

<b>Quality Incentive Adjustment Inputs RY24</b>		
SAIDI	Planned	Unplanned
Interruption Cap	125.16	82.34
Interruption Collar	0.00	0.00
Interruption Target	41.72	67.81
Assessed Value	73.62	70.19
Incentive Rate	16,185	
Actual Net Allowable Revenue (ANAR) \$000	119,393	
Minimum of Cap and Assessed	73.62	70.19
SAIDI subject to incentive (target – assessed)	(31.90)	(2.38)
Adjustment rate \$	8,093	16,185
SAIDI adjustment \$000	(258.16)	(38.51)

**Table 16 – Quality Incentive Inputs**

### 3 Transactions

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**3.1 Statement of Compliance** Unison has not entered into any agreements with another EDB or Transpower for an amalgamation, merger, major transaction or transfer in the assessment period.

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## Appendix A – Pass-through and Recoverable Costs

Actual and Forecast Pass-through Costs RY24				
Actual Pass-through Costs	Actual (\$000)	Forecast (\$000)	Forecast Variance (\$000)	Explanation for Variances
Local Body Rates on system fixed assets	940	969	(29)	Most local bodies implemented similar increases to those forecast. Taupo reduced the rates on three network invoices by \$39k which accounted for the majority of the variance.
Commerce Act levies	285	365	(80)	A wash-up from the previous pricing period received after compliance was completed was included in this year to the value of (\$111k).
Electricity Authority levies	308	378	(70)	The forecast increase in levies did not occur.
Utilities Disputes levies	76	75	1	
<b>Total actual pass-through costs</b>	<b>1,610</b>	<b>1,787</b>	<b>(177)</b>	

**Table 17 – Total Actual Pass-through Costs**

<b>Actual and Forecast Recoverable Costs RY24</b>				
Actual Recoverable Costs	Actual (\$000)	Forecast (\$000)	Forecast Variance (\$000)	Explanation for Variances
IRIS incentive adjustment <sup>1</sup>	4,692	4,692	0	
Transmission charges	28,146	28,146	0	
New investment contract charges	981	981	0	
System operator services charges	9	9	0	
Avoided transmission charges	0	0	0	
Distributed generation allowance	0	0	0	
Quality Charges	0	37	(37)	Forecast Quality charges were removed with the change in TPM
Catastrophic event allowance	0	0	0	
Extended reserves allowance	0	0	0	
Quality incentive adjustment	(255)	(255)	0	
Capex wash-up adjustment	23	23	0	
Reconsideration event allowance	0	0	0	
Quality standard variation engineers fee	0	0	0	
Urgent project allowance	0	0	0	
Fire and Emergency NZ levies	112	89	23	Actual levies were in line with the previous period. These were unknown at the time of price-setting.
Innovation project allowance	0	0	0	
<b>Total actual recoverable costs</b>	<b>33,708</b>	<b>33,722</b>	<b>(14)</b>	

**Table 18 – Total Actual Recoverable Costs**

<sup>1</sup> Capex IRIS calculation: Unison has relied on the model the Commerce Commission issued with the Electricity Distribution Services Default Price-Quality Path Determination 2020 to determine the Capex IRIS incentive for the assessment period (Calculations-of-IRIS-recoverable-costs-for-DPP3-EDB-DPP3-final-determination-27-November-2019.xls). In late July 2022, Unison became aware of an error in the Commission's CAPEX IRIS calculations, where incorrect cell references meant the calculation of depreciation referred to the incorrect year for weighted average life of assets. Unison has corrected the Commission's model, including by updating the weighted average life of assets commissioned in 2014/15 to ensure that depreciation is calculated correctly for all assets through the 2015-2020 regulatory period.

## Appendix B – Prices and Quantities

Table 19 shows the actual prices and quantities for the actual revenue for the fourth assessment period.

### Actual Revenue from Prices RY24

Price Code	Unit	Unit Price \$	Quantity	Revenue \$
E-H-DNR-24UC	\$/kWh	0.0690	1,959,383.94	135
E-H-DNR-AICO	\$/kWh	0.0500	583,167.90	29
E-H-DNR-CTRL	\$/kWh	0.0220	227,598.36	5
E-H-DNR-CTUD	\$/kWh	0.0890	324.89	0
E-H-DNR-DGEN	\$/kWh	0.0000	24,181.95	0
E-H-DNR-NITE	\$/kWh	0.0230	3,178.06	0
E-H-DNR-PROJ	\$/kWh	0.0690	3,744.00	0
E-H-I60-DMND	\$/kW/mth	0.0000	458,454.36	0
E-H-I60-KVAR	\$/kVAR/mth	7.5500	32,841.62	248
E-H-I60-RKVAR	\$/kVAR/mth	-7.5500	3,202.45	-24
E-H-I60-TAIC	\$/kWh	0.0000	193,195,557.00	0
E-H-M11-24UC	\$/kWh	0.1040	46,994,235.02	4,887
E-H-M11-AICO	\$/kWh	0.0850	22,925,581.09	1,949
E-H-M11-CTRL	\$/kWh	0.0570	10,814,902.42	616
E-H-M11-CTUD	\$/kWh	0.1340	124,068.96	17
E-H-M11-DGEN	\$/kWh	0.0000	2,314,093.17	0
E-H-M11-NITE	\$/kWh	0.0340	210,091.93	7
E-H-M11-PROJ	\$/kWh	0.1040	180,706.46	19
E-H-M12-24UC	\$/kWh	0.0690	71,872,000.82	4,959
E-H-M12-AICO	\$/kWh	0.0500	34,374,981.26	1,719
E-H-M12-CTRL	\$/kWh	0.0220	13,013,796.12	286
E-H-M12-CTUD	\$/kWh	0.0890	210,218.39	19
E-H-M12-DGEN	\$/kWh	0.0000	2,473,522.83	0
E-H-M12-NITE	\$/kWh	0.0230	317,612.56	7
E-H-M12-PROJ	\$/kWh	0.0690	459,868.07	32
E-H-MC-24UC	\$/kWh	0.0390	114,413,233.53	4,462
E-H-MC-CTRL	\$/kWh	0.0210	545,436.99	11
E-H-MC-CTUD	\$/kWh	0.0500	3,865,833.29	193
E-H-MC-DEFT	\$/kWh	0.0470	4,300,363.06	202
E-H-MC-DGEN	\$/kWh	0.0000	884,225.07	0
E-H-MC-DMND	\$/kW/mth	3.2500	683,273.24	2,221
E-H-MC-KVAR	\$/kVAR/mth	7.5500	45,189.14	341
E-H-MC-NITE	\$/kWh	0.0130	1,610,874.32	21
E-H-MC-PROJ	\$/kWh	0.0390	32,777.34	1
E-H-MC-SOPD	\$/kW/mth	3.2500	369,384.84	1,201
E-H-MC-TAIC	\$/kWh	0.0000	212,172,659.00	0



Price Code	Unit	Unit Price \$	Quantity	Revenue \$
E-H-MC-WOPD	\$/kW/mth	5.2500	273,317.06	1,435
E-H-NDA-24UC	\$/kWh	0.0900	26,854,682.64	2,417
E-H-NDA-CTRL	\$/kWh	0.0500	500,519.77	25
E-H-NDA-NITE	\$/kWh	0.0320	126,208.92	4
E-H-NDA-CTUD	\$/kWh	0.1210	304,819.79	37
E-H-NDA-PROJ	\$/kWh	0.0900	170,294.72	15
E-H-NDA-DGEN	\$/kWh	0.0000	125,381.37	0
E-H-TCU-CTRL	\$/kWh	0.0500	171,620.99	9
E-H-TCU-DGEN	\$/kWh	0.0000	21,053.77	0
E-H-TCU-OFPK	\$/kWh	0.0300	2,169,966.18	65
E-H-TCU-ONPK	\$/kWh	0.1190	3,518,148.65	419
E-H-TCU-PROJ	\$/kWh	0.1190	12,006.27	1
E-H-TCU-SHDR	\$/kWh	0.0810	3,796,551.14	308
E-H-THU-CTRL	\$/kWh	0.0220	11,974,059.35	263
E-H-THU-DGEN	\$/kWh	0.0000	1,480,885.54	0
E-H-THU-NITE	\$/kWh	0.0230	60,692.40	1
E-H-THU-OFPK	\$/kWh	0.0230	26,639,928.45	613
E-H-THU-ONPK	\$/kWh	0.0930	30,755,253.06	2,860
E-H-THU-PKIN	\$/kWh	0.0660	13,431,319.26	886
E-H-THU-PROJ	\$/kWh	0.0690	399,110.51	28
E-H-THU-SHDR	\$/kWh	0.0640	24,884,497.38	1,593
E-H-THU-SHIN	\$/kWh	0.0460	10,719,299.93	493
E-H-TLU-CTRL	\$/kWh	0.0570	10,875,013.18	620
E-H-TLU-DGEN	\$/kWh	0.0000	1,264,517.76	0
E-H-TLU-NITE	\$/kWh	0.0340	23,516.76	1
E-H-TLU-OFPK	\$/kWh	0.0340	17,339,815.45	590
E-H-TLU-ONPK	\$/kWh	0.1370	21,053,833.48	2,884
E-H-TLU-PKIN	\$/kWh	0.1110	9,690,371.22	1,076
E-H-TLU-PROJ	\$/kWh	0.1040	271,349.83	28
E-H-TLU-SHDR	\$/kWh	0.1010	16,713,915.56	1,688
E-H-TLU-SHIN	\$/kWh	0.0820	7,568,864.01	621
E-H-U01-UNMT	\$/kWh	0.2200	464,941.98	102
E-H-U02-UNMT	\$/kWh	0.2200	529,577.49	117
E-H-U03-UNMT	\$/kWh	0.0150	4,810,820.00	72
F-H-DNR	\$/day	1.6000	231,199.00	370
F-H-I60-007	\$/day	612.2200	366.00	224
F-H-I60-008	\$/day	421.1600	366.00	154
F-H-I60-009	\$/day	758.3300	366.00	278
F-H-I60-010	\$/day	642.3400	366.00	235
F-H-I60-011	\$/day	361.9000	366.00	132
F-H-I60-012	\$/day	599.6400	366.00	219
F-H-I60-013	\$/day	1,798.6300	366.00	658

Price Code	Unit	Unit Price \$	Quantity	Revenue \$
F-H-I60-014	\$/day	1,134.8800	366.00	415
F-H-I60-015	\$/day	563.7300	366.00	206
F-H-I60-016	\$/day	536.8500	339.00	182
F-H-I60-017	\$/day	1,568.1000	366.00	574
F-H-I60-021	\$/day	400.7700	366.00	147
F-H-I60-022	\$/day	434.2700	366.00	159
F-H-I60-023	\$/day	343.3000	302.00	104
F-H-I60-024	\$/day	361.1400	366.00	132
F-H-I60-025	\$/day	76.4600	366.00	28
F-H-I60-026	\$/day	238.7200	366.00	87
F-H-I60-028	\$/day	767.9600	0.00	0
F-H-I60-031	\$/day	6.0700	0.00	0
F-H-I60-033	\$/day	265.8200	328.00	87
F-H-I60-034	\$/day	133.8000	366.00	49
F-H-I60-035	\$/day	137.8900	366.00	50
F-H-I60-036	\$/day	192.3700	366.00	70
F-H-I60-037	\$/day	67.1600	366.00	25
F-H-I60-038	\$/day	178.4700	366.00	65
F-H-I60-039	\$/day	195.2400	366.00	71
F-H-I60-040	\$/day	161.3300	366.00	59
F-H-I60-041	\$/day	44.8800	366.00	16
F-H-I60-042	\$/day	233.5900	366.00	85
F-H-I60-043	\$/day	166.0600	366.00	61
F-H-I60-044	\$/day	100.9700	366.00	37
F-H-I60-045	\$/day	98.0900	366.00	36
F-H-I60-047	\$/day	97.4700	366.00	36
F-H-I60-048	\$/day	94.6900	366.00	35
F-H-I60-049	\$/day	191.5700	366.00	70
F-H-I60-050	\$/day	555.8900	366.00	203
F-H-I60-051	\$/day	555.8900	366.00	203
F-H-I60-052	\$/day	82.6100	366.00	30
F-H-I60-053	\$/day	50.0300	366.00	18
F-H-I60-054	\$/day	256.0800	366.00	94
F-H-I60-055	\$/day	163.9300	0.00	0
F-H-I60-056	\$/day	28.2100	366.00	10
F-H-I60-057	\$/day	26.9800	366.00	10
F-H-I60-058	\$/day	31.2500	366.00	11
F-H-I60-059	\$/day	86.2000	366.00	32
F-H-I60-060	\$/day	26.9800	366.00	10
F-H-I60-061	\$/day	97.0500	366.00	36
F-H-I60-062	\$/day	106.8400	366.00	39
F-H-I60-063	\$/day	55.5300	366.00	20

Price Code	Unit	Unit Price \$	Quantity	Revenue \$
F-H-I60-064	\$/day	546.4900	366.00	200
F-H-I60-065	\$/day	263.4200	366.00	96
F-H-I60-066	\$/day	357.8100	366.00	131
F-H-I60-067	\$/day	100.2900	366.00	37
F-H-I60-068	\$/day	68.5700	366.00	25
F-H-I60-069	\$/day	38.5700	366.00	14
F-H-I60-070	\$/day	98.0700	366.00	36
F-H-I60-071	\$/day	199.6200	366.00	73
F-H-I60-072	\$/day	45.4300	366.00	17
F-H-I60-073	\$/day	139.5500	366.00	51
F-H-I60-074	\$/day	73.0700	366.00	27
F-H-I60-075	\$/day	60.7100	366.00	22
F-H-I60-076	\$/day	291.5300	366.00	107
F-H-I60-077	\$/day	19.5700	366.00	7
F-H-I60-078	\$/day	308.1200	366.00	113
F-H-I60-079	\$/day	291.2300	366.00	107
F-H-I60-080	\$/day	176.6100	366.00	65
F-H-I60-081	\$/day	47.3000	366.00	17
F-H-I60-082	\$/day	78.0200	366.00	29
F-H-I60-083	\$/day	333.1100	366.00	122
F-H-I60-084	\$/day	457.3300	366.00	167
F-H-I60-085	\$/day	166.4300	366.00	61
F-H-I60-086	\$/day	110.1600	366.00	40
F-H-I60-087	\$/day	109.0400	366.00	40
F-H-I60-088	\$/day	107.8900	366.00	39
F-H-I60-089	\$/day	36.7700	366.00	13
F-H-I60-090	\$/day	265.0000	366.00	97
F-H-I60-091	\$/day	47.7300	366.00	17
F-H-I60-092	\$/day	102.0100	366.00	37
F-H-I60-093	\$/day	94.0700	279.00	26
F-H-I60-094	\$/day	102.7600	279.00	29
F-H-I60-099	\$/day	0.0000	366.00	0
F-H-I60-102	\$/day	199.0400	366.00	73
F-H-I60-103	\$/day	27.6200	366.00	10
F-H-M11	\$/day	0.4500	5,563,451.00	2,504
F-H-M12	\$/day	1.2200	4,796,280.00	5,851
F-H-MC1	\$/day	6.2500	1,155,006.00	7,219
F-H-MC2	\$/day	12.5000	130,869.00	1,636
F-H-MC3	\$/day	25.0000	82,931.00	2,073
F-H-MC5	\$/day	31.0000	22,452.00	696
F-H-MC6	\$/day	36.0000	12,098.00	436
F-H-MC7	\$/day	41.0000	8,581.00	352

Price Code	Unit	Unit Price \$	Quantity	Revenue \$
F-H-MC8	\$/day	46.0000	5,856.00	269
F-H-MC9	\$/day	51.0000	5,490.00	280
F-H-MC-COAD	\$/day	-1.9000	366.00	-1
F-H-MC-T020	\$/day	5.4600	20,595.00	112
F-H-MC-T030	\$/day	7.2000	16,970.00	122
F-H-MC-T050	\$/day	9.4500	19,600.00	185
F-H-MC-T075	\$/day	11.7400	13,176.00	155
F-H-MC-T100	\$/day	13.9200	7,119.00	99
F-H-MC-T150	\$/day	15.2900	1,098.00	17
F-H-NDA	\$/day	1.5000	1,611,391.00	2,417
F-H-TCU	\$/day	1.5000	431,379.00	647
F-H-THU	\$/day	1.2200	4,216,621.00	5,144
F-H-TLU	\$/day	0.4500	5,717,060.00	2,573
F-H-U03	\$/fitting/mth	0.1900	6,344,001.00	1,205
E-R-DNR-24UC	\$/kWh	0.0590	6,044,711.57	357
E-R-DNR-AICO	\$/kWh	0.0420	3,977,442.14	167
E-R-DNR-CTRL	\$/kWh	0.0170	864,881.28	15
E-R-DNR-CTUD	\$/kWh	0.0775	355,793.20	28
E-R-DNR-DGEN	\$/kWh	0.0000	32,682.18	0
E-R-DNR-NITE	\$/kWh	0.0180	204,070.27	4
E-R-DNR-PROJ	\$/kWh	0.0590	8,435.00	0
E-R-I60-DMND	\$/kW/mth	0.0000	266,131.08	0
E-R-I60-KVAR	\$/kVAR/mth	7.5500	36,289.38	274
E-R-I60-RKVAR	\$/kVAR/mth	-7.5500	19,171.53	-145
E-R-I60-TAIC	\$/kWh	0.0000	98,083,793.00	0
E-R-M11-24UC	\$/kWh	0.0940	30,656,414.94	2,882
E-R-M11-AICO	\$/kWh	0.0770	34,548,111.15	2,660
E-R-M11-CTRL	\$/kWh	0.0520	4,959,431.94	258
E-R-M11-CTUD	\$/kWh	0.1220	1,088,329.05	133
E-R-M11-DGEN	\$/kWh	0.0000	874,282.72	0
E-R-M11-NITE	\$/kWh	0.0310	977,964.72	30
E-R-M11-PROJ	\$/kWh	0.0940	252,725.06	24
E-R-M12-24UC	\$/kWh	0.0590	50,071,481.99	2,954
E-R-M12-AICO	\$/kWh	0.0420	43,700,308.49	1,835
E-R-M12-CTRL	\$/kWh	0.0170	8,133,004.58	138
E-R-M12-CTUD	\$/kWh	0.0775	2,141,416.72	166
E-R-M12-DGEN	\$/kWh	0.0000	793,881.32	0
E-R-M12-NITE	\$/kWh	0.0180	1,624,980.69	29
E-R-M12-PROJ	\$/kWh	0.0590	379,830.61	22
E-R-MC-24UC	\$/kWh	0.0390	119,558,107.58	4,663
E-R-MC-CTRL	\$/kWh	0.0210	1,500,294.73	32
E-R-MC-CTUD	\$/kWh	0.0500	14,499,829.99	725

Price Code	Unit	Unit Price \$	Quantity	Revenue \$
E-R-MC-DEFT	\$/kWh	0.0470	5,125,822.89	241
E-R-MC-DGEN	\$/kWh	0.0000	251,390.52	0
E-R-MC-DMND	\$/kWh	3.2000	375,048.44	1,200
E-R-MC-KVAR	\$/kVAR/mth	7.5500	31,675.85	239
E-R-MC-NITE	\$/kWh	0.0130	5,646,115.90	73
E-R-MC-PROJ	\$/kWh	0.0390	11,296.95	0
E-R-MC-RKVAR	\$/kVAR/mth	-7.5500	0.00	0
E-R-MC-SOPD	\$/kW/mth	3.2500	200,585.58	652
E-R-MC-TAIC	\$/kWh	0.0000	120,524,023.00	0
E-R-MC-WOPD	\$/kW/mth	5.2500	151,075.48	793
E-R-NDA-24UC	\$/kWh	0.0650	15,298,388.88	994
E-R-NDA-CTRL	\$/kWh	0.0360	306,584.61	11
E-R-NDA-NITE	\$/kWh	0.0200	264,090.56	5
E-R-NDA-CTUD	\$/kWh	0.0890	464,186.07	41
E-R-NDA-PROJ	\$/kWh	0.0650	23,081.21	2
E-R-NDA-DGEN	\$/kWh	0.0000	29,850.21	0
E-R-TCU-CTRL	\$/kWh	0.0360	195,303.46	7
E-R-TCU-OFPK	\$/kWh	0.0210	1,061,977.76	22
E-R-TCU-ONPK	\$/kWh	0.0860	1,634,872.70	141
E-R-TCU-PROJ	\$/kWh	0.0860	33,239.40	3
E-R-TCU-SHDR	\$/kWh	0.0590	1,696,760.38	100
E-R-THU-CTRL	\$/kWh	0.0170	5,252,770.77	89
E-R-THU-DGEN	\$/kWh	0.0000	451,491.56	0
E-R-THU-NITE	\$/kWh	0.0180	435,805.18	8
E-R-THU-OFPK	\$/kWh	0.0180	15,546,458.98	280
E-R-THU-ONPK	\$/kWh	0.0800	14,622,440.15	1,170
E-R-THU-PKIN	\$/kWh	0.0560	10,702,229.32	599
E-R-THU-PROJ	\$/kWh	0.0800	781,317.83	63
E-R-THU-SHDR	\$/kWh	0.0550	11,718,111.23	644
E-R-THU-SHIN	\$/kWh	0.0390	8,527,929.80	333
E-R-TLU-CTRL	\$/kWh	0.0520	2,976,077.08	155
E-R-TLU-DGEN	\$/kWh	0.0000	653,468.28	0
E-R-TLU-NITE	\$/kWh	0.0310	303,239.82	9
E-R-TLU-OFPK	\$/kWh	0.0310	10,806,161.17	335
E-R-TLU-ONPK	\$/kWh	0.1240	10,228,487.33	1,268
E-R-TLU-PKIN	\$/kWh	0.1000	8,244,732.23	824
E-R-TLU-PROJ	\$/kWh	0.1240	669,213.03	83
E-R-TLU-SHDR	\$/kWh	0.0910	8,188,590.68	745
E-R-TLU-SHIN	\$/kWh	0.0730	6,498,316.54	474
E-R-U01-UNMT	\$/kWh	0.2200	352,703.12	78
E-R-U02-UNMT	\$/kWh	0.2200	112,326.02	25
E-R-U03-UNMT	\$/kWh	0.0150	2,723,420.00	41

Price Code	Unit	Unit Price \$	Quantity	Revenue \$
E-R-UNISON	\$/kWh	0.0000	107,131.49	0
F-R-DNR	\$/day	1.6000	1,062,264.00	1,700
F-R-I60-001	\$/day	949.4000	366.00	347
F-R-I60-002	\$/day	1,097.5600	366.00	402
F-R-I60-003	\$/day	771.9200	366.00	283
F-R-I60-005	\$/day	47.2200	0.00	0
F-R-I60-006	\$/day	93.8900	366.00	34
F-R-I60-007	\$/day	68.5700	366.00	25
F-R-I60-008	\$/day	158.4100	366.00	58
F-R-I60-009	\$/day	224.6200	366.00	82
F-R-I60-011	\$/day	378.1500	366.00	138
F-R-I60-012	\$/day	509.0500	366.00	186
F-R-I60-013	\$/day	462.5500	366.00	169
F-R-I60-014	\$/day	1.0000	366.00	0
F-R-I60-015	\$/day	233.6900	366.00	86
F-R-I60-016	\$/day	0.0000	0.00	0
F-R-I60-017	\$/day	187.4400	366.00	69
F-R-I60-018	\$/day	59.6300	366.00	22
F-R-I60-019	\$/day	24.5000	366.00	9
F-R-I60-020	\$/day	24.1100	366.00	9
F-R-I60-021	\$/day	6.9400	366.00	3
F-R-I60-026	\$/day	1,682.3300	366.00	616
F-R-I60-027	\$/day	150.0100	366.00	55
F-R-I60-028	\$/day	84.7900	366.00	31
F-R-I60-031	\$/day	0.0000	366.00	0
F-R-I60-034	\$/day	0.0000	366.00	0
F-R-I60-041	\$/day	135.8100	366.00	50
F-R-I60-042	\$/day	154.3100	366.00	56
F-R-I60-043	\$/day	150.5100	366.00	55
F-R-I60-044	\$/day	129.5400	366.00	47
F-R-I60-045	\$/day	146.7200	366.00	54
F-R-I60-046	\$/day	126.2000	366.00	46
F-R-I60-047	\$/day	131.7300	366.00	48
F-R-I60-048	\$/day	150.3400	366.00	55
F-R-I60-049	\$/day	147.2700	366.00	54
F-R-I60-050	\$/day	127.4000	366.00	47
F-R-I60-051	\$/day	148.2100	366.00	54
F-R-I60-052	\$/day	132.0100	366.00	48
F-R-I60-053	\$/day	149.4900	366.00	55
F-R-I60-054	\$/day	148.3200	366.00	54
F-R-I60-055	\$/day	127.6200	366.00	47
F-R-I60-056	\$/day	128.1100	366.00	47



Price Code	Unit	Unit Price \$	Quantity	Revenue \$
F-R-I60-057	\$/day	128.2900	366.00	47
F-R-I60-058	\$/day	149.4300	366.00	55
F-R-I60-059	\$/day	187.4000	366.00	69
F-R-I60-060	\$/day	279.3900	366.00	102
F-R-I60-061	\$/day	36.3400	366.00	13
F-R-I60-062	\$/day	84.5300	366.00	31
F-R-I60-063	\$/day	734.2800	366.00	269
F-R-I60-064	\$/day	145.1400	366.00	53
F-R-I60-065	\$/day	34.1500	366.00	12
F-R-I60-066	\$/day	121.8600	0.00	0
F-R-I60-067	\$/day	14.9200	366.00	5
F-R-I60-068	\$/day	127.1700	366.00	47
F-R-I60-069	\$/day	13.4300	366.00	5
F-R-I60-070	\$/day	252.7900	366.00	93
F-R-I60-071	\$/day	14.5900	366.00	5
F-R-I60-073	\$/day	80.5000	91.00	7
F-R-I60-074	\$/day	196.1500	91.00	18
F-R-I60-075	\$/day	24.4900	91.00	2
F-R-I60-098	\$/day	0.0000	732.00	0
F-R-I60-099	\$/day	0.0000	0.00	0
F-R-I60-100	\$/day	246.4800	122.00	30
F-R-I60-101	\$/day	1,218.8200	122.00	149
F-R-I60-102	\$/day	27.9800	122.00	3
F-R-I60-103	\$/day	137.6900	122.00	17
F-R-M11	\$/day	0.4500	4,811,491.00	2,165
F-R-M12	\$/day	1.2200	4,328,389.00	5,281
F-R-MC1	\$/day	5.7500	1,416,973.00	8,148
F-R-MC2	\$/day	11.5000	113,317.00	1,303
F-R-MC3	\$/day	22.5000	48,538.00	1,092
F-R-MC5	\$/day	28.0000	22,952.00	643
F-R-MC6	\$/day	34.0000	6,588.00	224
F-R-MC7	\$/day	40.0000	3,166.00	127
F-R-MC8	\$/day	46.0000	3,294.00	152
F-R-MC9	\$/day	52.0000	1,941.00	101
F-R-MC-COAD	\$/day	-1.9000	366.00	-1
F-R-MC-T020	\$/day	5.4600	11,346.00	62
F-R-MC-T030	\$/day	7.2000	12,740.00	92
F-R-MC-T050	\$/day	9.4500	20,664.00	195
F-R-MC-T075	\$/day	11.7400	6,155.00	72
F-R-MC-T100	\$/day	13.9200	1,209.00	17
F-R-MC-T150	\$/day	15.2900	366.00	6
F-R-NDA	\$/day	1.5000	873,351.00	1,310

Price Code	Unit	Unit Price \$	Quantity	Revenue \$
F-R-TCU	\$/day	1.5000	165,091.00	248
F-R-THU	\$/day	1.2200	2,376,199.00	2,899
F-R-TLU	\$/day	0.4500	3,169,966.00	1,426
F-R-U03	\$/fitting/mth	0.1900	3,954,250.00	751
			<b>1,742,452,012.69</b>	<b>146,132</b>
<b>Revenue from Wash-ups from previous pricing years</b>				<b>-604</b>
<b>Total Revenue from prices</b>				<b>145,529</b>

Table 19 – Actual revenue 4<sup>th</sup> Assessment Period

Table 20 shows the forecast revenue from prices for the fourth assessment period from the price setting compliance statement.

<b>Forecast revenue from prices RY24</b>	<b>149,775</b>
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Table 20 – 4<sup>th</sup> Assessment period Forecast Revenue



## Appendix C – Policies and Procedures for Measuring Planned and Unplanned Interruptions

### Unison systems for recording SAIDI and SAIFI

Unison uses ADMS SCADA for recording operations of network switches with time stamped data used for calculation of SAIDI and SAIFI. A detailed explanation of how the ADMS system is used to calculate SAIDI and SAIFI can be found in the 'ADMS – All interruptions' section in this appendix.

### SCADA timing

Automatically recorded SCADA data is time stamped at the Remote Terminal Unit (RTU), and the data is time corrected to the master station each half hour.

### Unison's SCADA: Remote devices in ADMS

Unison's ADMS SCADA system has been designed to capture real-time data.

In both the Hawke's Bay and Rotorua/Taupo network systems, all zone substations 33kV and 11kV circuit breakers are linked by Remote Terminal Units (RTUs). The RTUs report automatically and time stamp all changes of state of devices directly to the SCADA ADMS Event Summary.

The exception is Atiamuri zone substation which has no SCADA link to Unison. Interruptions to supply from Atiamuri are time stamped using information from downstream devices.

On the SCADA system, each zone substation and 11kV feeder is represented by a schematic picture and a SCADA tile.

### Unison's SCADA: Non-remote devices in ADMS

Switching devices that have no SCADA link to Unison have a pseudo point defined in the SCADA database. Each point has an identifier name that relates to the real world switch number.

As Field Operators complete operational items, they report this to the System Control Operator. The System Control Operator then manually sets the field device's pseudo point on the appropriate SCADA tile. This action is automatically recorded and time stamped in the SCADA ADMS Event Summary.

### Outage data sources

The capture of outage data uses the following data sources and utilities:

Data	Source
(1) Numbers of ICPs attached to 11kV/400v transformers.	GIS
(2) Transformers connected between isolation points.	GIS
(3) Real time data.	ADMS SCADA

**ADMS – All interruptions**

ADMS is updated with customer numbers and connectivity from GIS daily. Zone (33kV/11kV) substation connectivity is maintained manually by the SCADA team.

The SCADA tile is updated by either:

- an operation of a device that is linked via SCADA, or
- a manual update which is a switch status updated by the System Control Operator.

The software is updated to reflect the real-time physical state of the network, including energisation of customers.

If the switching operation de-energises customers, ADMS will create an 'incident' and 'SDP interruptions'.<sup>2</sup> The 'incident' has a unique identifier for the interruption and contains operational information, for example, the cause of the interruption. The 'SDP interruptions' are created in ADMS for each supply disruption to each customer affected. It records the start and end times of the interruption and contains a link to the parent 'incident'.

When all customers are restored, the System Control Operator updates the relevant general details on the incident and 'archives' it. This removes the incident from the list of current interruptions in ADMS and allows it to be viewed by other systems at Unison.

Customer Minutes Lost (CML) is calculated for each incident by adding all the minutes from the 'SDP interruptions' associated with that incident. CML is then divided by the number of connected customers to calculate SAIDI for the incident. This task is performed by a Unison database script.

SAIFI is calculated for the incident by dividing the number of customers affected by the number of connected customers (the average customers for the disclosure year).

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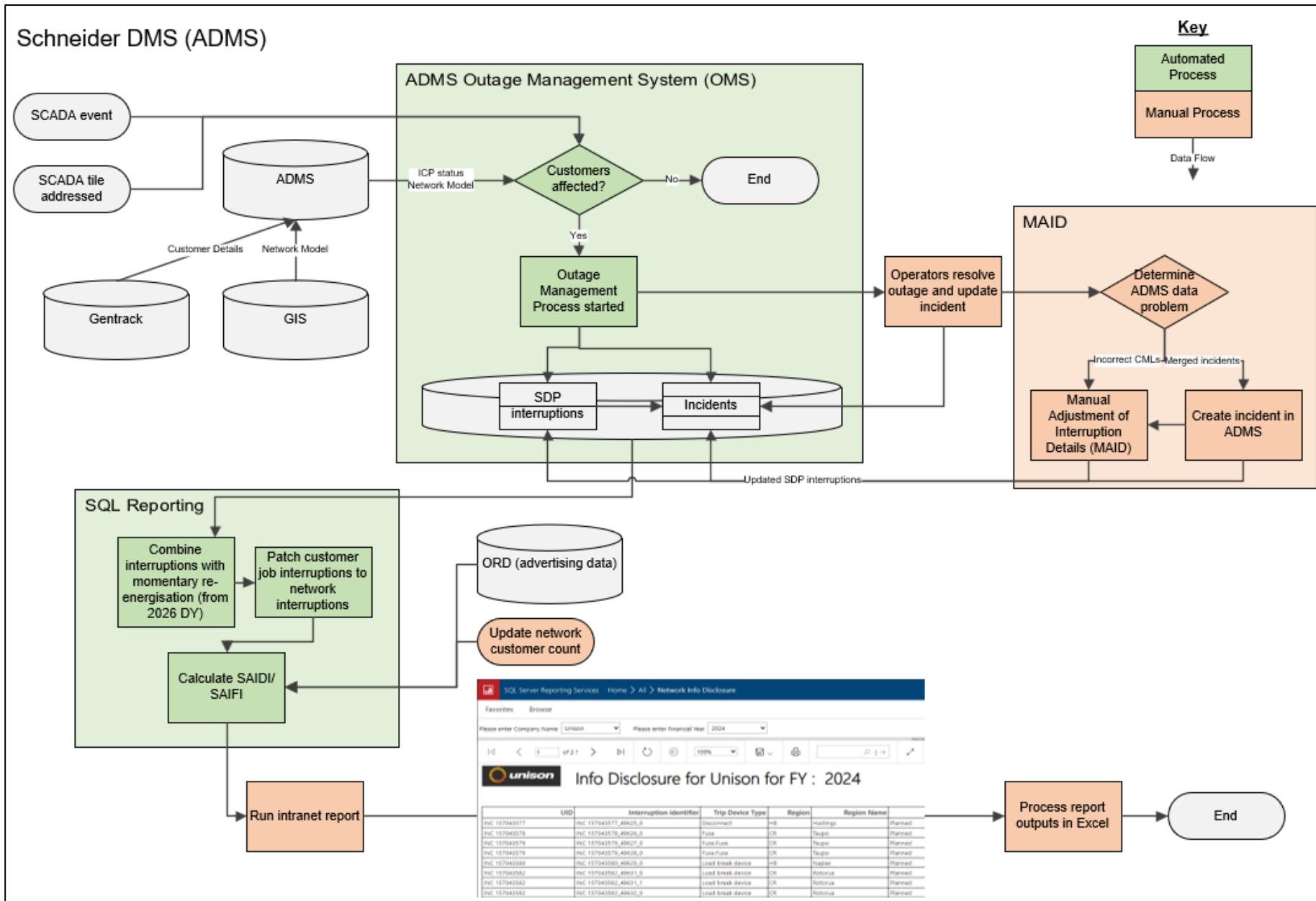
**MAID**

The automated capture of SDP interruptions in ADMS can occasionally have errors. These are normally a result of incidents of different causes being combined by the system or from incorrect recording of timestamps. In order to correct these errors, Unison uses a Manual Adjustment of Interruption Data (MAID) process to adjust incident SDP interruption data and document these changes.

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<sup>2</sup> SDP – Service Delivery Point, the ADMS equivalent of an ICP.



## Appendix D – SAIDI and SAIFI Major Events

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### **SAIDI Major Event 16/09/2023 – 18/09/2023**

The SAIDI major event that Unison experienced between 16/09/2023 and 18/09/2023 was caused by a combination of outages as opposed to any single high impact outage. The predominant cause for these outages was vegetation events, which arose from high winds in the area. Most outages occurred on 11kV distribution lines (overhead) in the Hawke's Bay region.

Outages mostly started during a concentrated period, which tends to stretch resources more than a prolonged event. Unison prioritised unplanned outages according to the outage management processes, which generally results in outages affecting the most customers being attended first. Some impact of the major event may have been mitigated if a wind watch/warning was issued sooner, enabling a more structured resource scaling plan to be produced.

To mitigate the risk of future major events, Unison continues to identify and action continual improvement opportunities, including engagement with weather providers to understand what forecasting products are available on the market and how these can be used to pre-empt significant network events.

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### **SAIDI Major Event 1/02/2024 – 3/02/2024**

The SAIDI major event that Unison experienced between 1/02/2024 and 3/02/2024 was caused by a combination of outages as opposed to any single high impact outage. The predominant cause for these outages was vegetation events, which arose from high winds across the network. Most outages occurred on 11kV distribution lines (overhead), with the Hawke's Bay region accruing the majority of the unplanned SAIDI for the period, although two notable incidents did occur on 33kV subtransmission lines (overhead).

Unison followed its documented unplanned outage management standard to respond to these outages in a structured manner. Along with this, Unison also utilised a helicopter to efficiently patrol and locate faults on some rural lines.

With at least one outage during the major event being caused by a fall distance zone (FDZ) tree in a forestry block, greater regulation and wider corridors through these blocks may have mitigated some of the impact of the event. Unison continues to contribute to EDB work in tree regulations to improve regulation and reduce the chance of future major events being caused by vegetation events.

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## Appendix E – Independent Auditor's Report

AUDIT NEW ZEALAND  
Mana Arotake Aotearoa

### Independent Assurance Report

**To the directors of Unison Networks Limited and to the Commerce  
Commission  
on the Annual Compliance Statement  
for the assessment period ended 31 March 2024  
as required by the Electricity Distribution Services Default Price-Quality Path  
Determination 2020 (consolidated 20 May 2020)**

The Auditor-General is the auditor of Unison Networks Limited (the company). The Auditor-General has appointed me, Chris Webby, using the staff and resources of Audit New Zealand, to undertake a reasonable assurance engagement, on his behalf, on whether the Annual Compliance Statement on pages 5 to 28 for the assessment period ended on 31 March 2024 has been prepared, in all material respects, in compliance with the Electricity Distribution Services Default Price-Quality Path Determination 2020 (consolidated 20 May 2020) (the Determination).

### Opinion

In our opinion, in all material respects:

- as far as appears from our examination, the information used in the preparation of the Annual Compliance Statement has been properly extracted from the company's accounting and other records, sourced from its financial and non-financial systems; and
- the company has complied with clauses 11.5 and 11.6 of the Determination in preparing the Annual Compliance Statement for the assessment period ended 31 March 2024.

### Basis for opinion

We conducted our engagement in accordance with the International Standard on Assurance Engagements (New Zealand) 3000 (Revised) *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ("ISAE (NZ) 3000 (Revised)") and the Standard on Assurance Engagements (SAE) 3100 (Revised) *Compliance Engagements* ("SAE 3100 (Revised)"), issued by the New Zealand Auditing and Assurance Standards Board.

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

## **Directors' responsibilities**

The directors of the company are responsible for the:

- preparation of the Annual Compliance Statement under clause 11.4 and in accordance with the requirements in clauses 11.5 and 11.6 of the Determination; and
- identification of risks that may threaten compliance with the clauses identified above and controls which will mitigate those risks and monitor ongoing compliance.

## **Auditor's responsibilities**

Our responsibilities in terms of clause 11.5(e) and schedule 8(1)(b)(vi) and 8(1)(c) of the Determination, are to express an opinion on whether:

- as far as appears from our examination, the information used in the preparation of the Annual Compliance Statement has been properly extracted from the company's accounting and other records, sourced from its financial and non-financial systems; and
- the Annual Compliance Statement, for the assessment period ended 31 March 2024, has been prepared, in all material respects, in accordance with the requirements in clauses 11.5 and 11.6 of the Determination.

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

In relation to the wash-up amount set out in clause 8.6 of the Determination, our procedures included recalculation of the wash-up amount in accordance with schedule 1.6 of the Determination and assessing it against the amounts and disclosures contained on pages 5 to 7 and 14 to 24 of the Annual Compliance Statement.

In relation to the quality standards in clause 9 of the Determination, our procedures included examination, on a test basis, of evidence relevant to the values and disclosures contained on pages 8 to 11 and 28 of the Annual Compliance Statement.

In relation to the quality incentive adjustment set out in Schedule 4 of the Determination, our procedures included recalculation of the quality incentive adjustment in accordance with Schedule 4 of the Determination and assessing it against the amounts and disclosures contained on pages 12 of the Annual Compliance Statement.

In relation to transactions set out in clauses 10.1 to 10.18 of the Determination, our procedures included examination, on a test basis, of evidence relevant to the values and disclosures contained on page 13 of the Annual Compliance Statement.

An assurance engagement to report on the company's compliance with the Determination involves performing procedures to obtain evidence about the compliance activity and controls implemented

to meet the requirements. The procedures selected depend on our judgement, including the identification and assessment of the risks of material non-compliance with the requirements.

### **Inherent limitations**

Because of the inherent limitations of an assurance engagement, together with the internal control structure, it is possible that fraud, error, or non-compliance with clauses 11.5 and 11.6 of the Determination may occur and not be detected. A reasonable assurance engagement throughout the assessment period does not provide assurance on whether compliance with clauses 11.5 and 11.6 of the Determination will continue in the future.

### **Restricted use**

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

### **Independence and quality control**

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

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



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



Chris Webby  
Audit New Zealand  
On behalf of the Auditor-General  
Palmerston North, New Zealand  
22 August 2024