



2022

Information Disclosure

Year End 31 March 2022

**keeping you
connected**

0800 367 546
thelinescompany.co.nz



EDB Information Disclosure Requirements
Information Templates
for
Schedules 1–10

Company Name

[The Lines Company Limited](#)

Disclosure Date

[31 August 2022](#)

Disclosure Year (year ended)

[31 March 2022](#)

Templates for Schedules 1–10 excluding 5f–5g
Template Version 4.1. Prepared 21 December 2017

Table of Contents

Schedule	Schedule name
1	<u>ANALYTICAL RATIOS</u>
2	<u>REPORT ON RETURN ON INVESTMENT</u>
3	<u>REPORT ON REGULATORY PROFIT</u>
4	<u>REPORT ON VALUE OF THE REGULATORY ASSET BASE (ROLLED FORWARD)</u>
5a	<u>REPORT ON REGULATORY TAX ALLOWANCE</u>
5b	<u>REPORT ON RELATED PARTY TRANSACTIONS</u>
5c	<u>REPORT ON TERM CREDIT SPREAD DIFFERENTIAL ALLOWANCE</u>
5d	<u>REPORT ON COST ALLOCATIONS</u>
5e	<u>REPORT ON ASSET ALLOCATIONS</u>
6a	<u>REPORT ON CAPITAL EXPENDITURE FOR THE DISCLOSURE YEAR</u>
6b	<u>REPORT ON OPERATIONAL EXPENDITURE FOR THE DISCLOSURE YEAR</u>
7	<u>COMPARISON OF FORECASTS TO ACTUAL EXPENDITURE</u>
8	<u>REPORT ON BILLED QUANTITIES AND LINE CHARGE REVENUES</u>
9a	<u>ASSET REGISTER</u>
9b	<u>ASSET AGE PROFILE</u>
9c	<u>REPORT ON OVERHEAD LINES AND UNDERGROUND CABLES</u>
9d	<u>REPORT ON EMBEDDED NETWORKS</u>
9e	<u>REPORT ON NETWORK DEMAND</u>
10	<u>REPORT ON NETWORK RELIABILITY</u>

Disclosure Template Instructions

These templates have been prepared for use by EDBs when making disclosures under clauses 2.3.1, 2.4.21, 2.4.22, 2.5.1, and 2.5.2 of the Electricity Distribution Information Disclosure Determination 2012.

Company Name and Dates

To prepare the templates for disclosure, the supplier's company name should be entered in cell C8, the date of the last day of the current (disclosure) year should be entered in cell C12, and the date on which the information is disclosed should be entered in cell C10 of the CoverSheet worksheet.

The cell C12 entry (current year) is used to calculate disclosure years in the column headings that show above some of the tables and in labels adjacent to some entry cells. It is also used to calculate the 'For year ended' date in the template title blocks (the title blocks are the light green shaded areas at the top of each template).

The cell C8 entry (company name) is used in the template title blocks.

Dates should be entered in day/month/year order (Example -"1 April 2013").

Data Entry Cells and Calculated Cells

Data entered into this workbook may be entered only into the data entry cells. Data entry cells are the bordered, unshaded areas (white cells) in each template. Under no circumstances should data be entered into the workbook outside a data entry cell.

In some cases, where the information for disclosure is able to be ascertained from disclosures elsewhere in the workbook, such information is disclosed in a calculated cell.

Validation Settings on Data Entry Cells

To maintain a consistency of format and to help guard against errors in data entry, some data entry cells test keyboard entries for validity and accept only a limited range of values. For example, entries may be limited to a list of category names, to values between 0% and 100%, or either a numeric entry or the text entry "N/A". Where this occurs, a validation message will appear when data is being entered. These checks are applied to keyboard entries only and not, for example, to entries made using Excel's copy and paste facility.

Conditional Formatting Settings on Data Entry Cells

Schedule 2 cells G79 and I79:L79 will change colour if the total cashflows do not equal the corresponding values in table 2(ii).

Schedule 4 cells P99:P105 and P107 will change colour if the RAB values do not equal the corresponding values in table 4(ii).

Schedule 9b columns AA to AE (2013 to 2017) contain conditional formatting. The data entry cells for future years are hidden (are changed from white to yellow).

Schedule 9b cells AG10 to AG60 will change colour if the total assets at year end for each asset class does not equal the corresponding values in column I in Schedule 9a.

Schedule 9c cell G30 will change colour if G30 (overhead circuit length by terrain) does not equal G18 (overhead circuit length by operating voltage).

Inserting Additional Rows and Columns

The templates for schedules 4, 5b, 5c, 5d, 5e, 6a, 8, 9d, and 9e may require additional rows to be inserted in tables marked 'include additional rows if needed' or similar. Column A schedule references should not be entered in additional rows, and should be deleted from additional rows that are created by copying and pasting rows that have schedule references.

Additional rows in schedules 5c, 6a, and 9e must not be inserted directly above the first row or below the last row of a table. This is to ensure that entries made in the new row are included in the totals.

Schedules 5d and 5e may require new cost or asset category rows to be inserted in allocation change tables 5d(iii) and 5e(ii). Accordingly, cell protection has been removed from rows 77 and 78 of the respective templates to allow blocks of rows to be copied. The four steps to add new cost category rows to table 5d(iii) are: Select Excel rows 69:77, copy, select Excel row 78, insert copied cells. Similarly, for table 5e(ii): Select Excel rows 70:78, copy, select Excel row 79, then insert copied cells.

The template for schedule 8 may require additional columns to be inserted between column P and U. To avoid interfering with the title block entries, these should be inserted to the left of column S. If inserting additional columns, the formulas for standard consumers total, non-standard consumers totals and total for all consumers will need to be copied into the cells of the added columns. The formulas can be found in the equivalent cells of the existing columns.

Disclosures by Sub-Network

If the supplier has sub-networks, schedules 8, 9a, 9b, 9c, 9e, and 10 must be completed for the network and for each sub-network. A copy of the schedule worksheet(s) must be made for each sub-network and named accordingly.

Schedule References

The references labelled 'sch ref' in the leftmost column of each template are consistent with the row references in the Electricity Distribution ID Determination 2012 (as issued on 21 December 2017). They provide a common reference between the rows in the determination and the template.

Description of Calculation References

Calculation cell formulas contain links to other cells within the same template or elsewhere in the workbook. Key cell references are described in a column to the right of each template. These descriptions are provided to assist data entry. Cell references refer to the row of the template and not the schedule reference.

Worksheet Completion Sequence

Calculation cells may show an incorrect value until precedent cell entries have been completed. Data entry may be assisted by completing the schedules in the following order:

1. Coversheet
2. Schedules 5a–5e
3. Schedules 6a–6b
4. Schedule 8
5. Schedule 3
6. Schedule 4
7. Schedule 2
8. Schedule 7
9. Schedules 9a–9e
10. Schedule 10

Company Name **The Lines Company 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	44,034	676	207,158	3,653	63,636
Network	15,331	235	72,125	1,272	22,156
Non-network	28,703	440	135,032	2,381	41,480
Expenditure on assets	43,239	664	203,416	3,587	62,487
Network	38,183	586	179,629	3,167	55,180
Non-network	5,056	78	23,787	419	7,307

1(ii): Revenue metrics

	Revenue per GWh energy delivered to ICPs (\$/GWh)	Revenue per average no. of ICPs (\$/ICP)
Total consumer line charge revenue	110,627	1,698
Standard consumer line charge revenue	131,714	1,466
Non-standard consumer line charge revenue	55,539	73,537

1(iii): Service intensity measures

Demand density	18	Maximum coincident system demand per km of circuit length (for supply) (kW/km)
Volume density	83	Total energy delivered to ICPs per km of circuit length (for supply) (MWh/km)
Connection point density	5	Average number of ICPs per km of circuit length (for supply) (ICPs/km)
Energy intensity	15,346	Total energy delivered to ICPs per average number of ICPs (kWh/ICP)

1(iv): Composition of regulatory income

	(\$000)	% of revenue
Operational expenditure	16,217	39.80%
Pass-through and recoverable costs excluding financial incentives and wash-ups	6,570	16.13%
Total depreciation	9,960	24.44%
Total revaluations	15,618	38.33%
Regulatory tax allowance	3,166	7.77%
Regulatory profit/(loss) including financial incentives and wash-ups	20,450	50.19%
Total regulatory income	40,746	

1(v): Reliability

Interruption rate	27.43	Interruptions per 100 circuit km
-------------------	-------	----------------------------------

Company Name **The Lines Company 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

ROI – comparable to a post tax WACC

Reflecting all revenue earned
 Excluding revenue earned from financial incentives
 Excluding revenue earned from financial incentives and wash-ups

Mid-point estimate of post tax WACC

25th percentile estimate
 75th percentile estimate

ROI – comparable to a vanilla WACC

Reflecting all revenue earned
 Excluding revenue earned from financial incentives
 Excluding revenue earned from financial incentives and wash-ups

WACC rate used to set regulatory price path

Mid-point estimate of vanilla WACC

25th percentile estimate
 75th percentile estimate

	CY-2	CY-1	Current Year CY
for year ended	31 Mar 20	31 Mar 21	31 Mar 22
	%	%	%
Reflecting all revenue earned	8.64%	3.61%	9.34%
Excluding revenue earned from financial incentives	8.79%	3.47%	10.07%
Excluding revenue earned from financial incentives and wash-ups	8.91%	3.47%	10.14%
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	9.06%	3.94%	9.64%
Excluding revenue earned from financial incentives	9.21%	3.80%	10.37%
Excluding revenue earned from financial incentives and wash-ups	9.34%	3.80%	10.44%
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
 plus Opening deferred tax

Opening RIV

Line charge revenue

Expenses cash outflow
 add Assets commissioned
 less Asset disposals
 add Tax payments
 less Other regulated income

Mid-year net cash outflows

Term credit spread differential allowance

Total closing RAB value
 less Adjustment resulting from asset allocation
 less Lost and found assets adjustment
 plus Closing deferred tax

Closing RIV

ROI – comparable to a vanilla WACC

Leverage (%)
 Cost of debt assumption (%)
 Corporate tax rate (%)

ROI – comparable to a post tax WACC

225,659			
(18,930)			
	206,729		
		40,742	
22,788			
19,711			
103			
1,500			
4			
	43,891		
		–	
250,864			
(153)			
93			
(20,596)			
	230,328		
			9.64%
			42%
			2.55%
			28%
			9.34%

Company Name

The Lines Company 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(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

10.48%

Year-end ROI – comparable to a post tax WACC

10.19%

* 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

(1,904)

Purchased assets – avoided transmission charge

-

Energy efficiency and demand incentive allowance

-

Quality incentive adjustment

(155)

Other financial incentives

-

Financial incentives

(2,059)

Impact of financial incentives on ROI

-0.73%

Input methodology claw-back

-

CPP application recoverable costs

-

Catastrophic event allowance

-

Capex wash-up adjustment

(200)

Transmission asset wash-up adjustment

-

2013–15 NPV wash-up allowance

-

Reconsideration event allowance

-

Other wash-ups

-

Wash-up costs

(200)

Impact of wash-up costs on ROI

-0.07%

Company Name **The Lines Company 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	40,742	
10	plus Gains / (losses) on asset disposals	4	
11	plus Other regulated income (other than gains / (losses) on asset disposals)	—	
12			
13	Total regulatory income	40,746	
14	Expenses		
15	less Operational expenditure	16,217	
16			
17	less Pass-through and recoverable costs excluding financial incentives and wash-ups	6,570	
18			
19	Operating surplus / (deficit)	17,959	
20			
21	less Total depreciation	9,960	
22			
23	plus Total revaluations	15,618	
24			
25	Regulatory profit / (loss) before tax	23,616	
26			
27	less Term credit spread differential allowance	—	
28			
29	less Regulatory tax allowance	3,166	
30			
31	Regulatory profit/(loss) including financial incentives and wash-ups	20,450	
32			
33	3(ii): Pass-through and Recoverable Costs excluding Financial Incentives and Wash-Ups		(\$000)
34	Pass through costs		
35	Rates	295	
36	Commerce Act levies	116	
37	Industry levies	88	
38	CPP specified pass through costs	—	
39	Recoverable costs excluding financial incentives and wash-ups		
40	Electricity lines service charge payable to Transpower	4,737	
41	Transpower new investment contract charges	—	
42	System operator services	—	
43	Distributed generation allowance	1,283	
44	Extended reserves allowance	—	
45	Other recoverable costs excluding financial incentives and wash-ups	52	
46	Pass-through and recoverable costs excluding financial incentives and wash-ups	6,570	
47			

Company Name **The Lines Company 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

		(\$000)	
		CY-1 31 Mar 21	CY 31 Mar 22
48	3(iii): Incremental Rolling Incentive Scheme		
49			
50			
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		—
65	3(iv): Merger and Acquisition Expenditure		
70			(\$000)
66	Merger and acquisition expenditure		—
67			
68	<i>Provide commentary on the benefits of merger and acquisition expenditure to the electricity distribution business, including required disclosures in accordance with section 2.7, in Schedule 14 (Mandatory Explanatory Notes)</i>		
69	3(v): Other Disclosures		
70			(\$000)
71	Self-insurance allowance		

Company Name **The Lines Company 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)

for year ended	RAB 31 Mar 18 (\$000)	RAB 31 Mar 19 (\$000)	RAB 31 Mar 20 (\$000)	RAB 31 Mar 21 (\$000)	RAB 31 Mar 22 (\$000)
Total opening RAB value	184,139	188,819	203,757	210,964	225,659
less Total depreciation	8,490	8,412	9,257	9,421	9,960
plus Total revaluations	2,013	2,794	5,149	3,201	15,618
plus Assets commissioned	12,035	20,903	11,012	20,970	19,711
less Asset disposals	878	347	408	164	103
plus Lost and found assets adjustment	–	–	–	109	93
plus Adjustment resulting from asset allocation	–	0	711		(153)
Total closing RAB value	188,819	203,757	210,964	225,659	250,864

4(ii): Unallocated Regulatory Asset Base

	Unallocated RAB *	RAB
	(\$000)	(\$000)
Total opening RAB value	225,940	225,659
less Total depreciation	10,139	9,960
plus Total revaluations	15,631	15,618
plus Assets commissioned (other than below)	20,017	19,711
Assets acquired from a regulated supplier		
Assets acquired from a related party	–	–
Assets commissioned	20,017	19,711
less Asset disposals (other than below)	103	103
Asset disposals to a regulated supplier		
Asset disposals to a related party		
Asset disposals	103	103
plus Lost and found assets adjustment	93	93
plus Adjustment resulting from asset allocation		(153)
Total closing RAB value	251,440	250,864

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

Company Name **The Lines Company 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

51

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

52

53

54

55

56

57

58

59

60

61

62

63

64

65

4(iv): Roll Forward of Works Under Construction

66

67

68

69

70

71

72

73

74

75

CPI_tCPI_t⁻⁴

Revaluation rate (%)

1,142

1,068

6.93%

Unallocated RAB *

RAB

(\$000)

(\$000)

(\$000)

(\$000)

225,940

225,659

346

252

225,594

225,407

15,631

15,618

Total opening RAB value

/less Opening value of fully depreciated, disposed and lost assets

Total opening RAB value subject to revaluation

Total revaluations

Unallocated works under

construction

Allocated works under construction

6,474

6,598

16,716

16,285

20,017

19,711

3,173

3,173

Works under construction—preceding disclosure year

plus Capital expenditure

less Assets commissioned

plus Adjustment resulting from asset allocation

Works under construction - current disclosure year

Highest rate of capitalised finance applied

1.93%

Company Name **The Lines Company 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(v): Regulatory Depreciation

Depreciation - standard
 Depreciation - no standard life assets
 Depreciation - modified life assets
 Depreciation - alternative depreciation in accordance with CPP
Total depreciation

Unallocated RAB *		RAB	
(\$000)	(\$000)	(\$000)	(\$000)
8,720		8,720	
1,418		1,240	
	10,139		9,960

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	18,723	578	30,919	88,216	23,237	33,342	20,921	6,297	3,426	225,659
less Total depreciation	815	14	1,066	3,072	1,187	1,447	794	326	1,240	9,960
plus Total revaluations	1,295	40	2,136	6,106	1,620	2,299	1,447	436	239	15,618
plus Assets commissioned	1,362	224	5,961	4,290	751	1,678	1,511	3,029	904	19,711
less Asset disposals	–	–	–	–	–	96	7	–	–	103
plus Lost and found assets adjustment	–	–	–	–	93	–	–	–	–	93
plus Adjustment resulting from asset allocation									(153)	(153)
plus Asset category transfers	(35)	3	15	(8)	55	(33)	4	(1)		0
Total closing RAB value	20,531	831	37,966	95,533	24,569	35,743	23,081	9,435	3,175	250,864
Asset Life										
Weighted average remaining asset life	32.0	42.4	28.5	37.1	35.5	28.3	30.4	15.9	9.2	(years)
Weighted average expected total asset life	53.8	55.1	45.3	56.4	52.8	45.0	41.5	22.2	7.8	(years)

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).

sch ref

5a(i): Regulatory Tax Allowance			(\$'000)
	Regulatory profit / (loss) before tax		23,616
plus	Income not included in regulatory profit / (loss) before tax but taxable		*
	Expenditure or loss in regulatory profit / (loss) before tax but not deductible		*
	Amortisation of initial differences in asset values	4,085	
	Amortisation of revaluations	1,411	
			5,497
less	Total revaluations	15,618	
	Income included in regulatory profit / (loss) before tax but not taxable		*
	Discretionary discounts and customer rebates	—	
	Expenditure or loss deductible but not in regulatory profit / (loss) before tax		*
	Notional deductible interest	2,186	
			17,804
	Regulatory taxable income		11,309
less	Utilised tax losses		
	Regulatory net taxable income		11,309
	Corporate tax rate (%)	28%	
	Regulatory tax allowance		3,166

* Workings to be provided in Schedule 14

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

5a(iii): Amortisation of Initial Difference in Asset Values		(\$'000)
	Opening unamortised initial differences in asset values	75,791
less	Amortisation of initial differences in asset values	4,085
plus	Adjustment for unamortised initial differences in assets acquired	
less	Adjustment for unamortised initial differences in assets disposed	
	Closing unamortised initial differences in asset values	71,706
	Opening weighted average remaining useful life of relevant assets (years)	19

Company Name **The Lines Company 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

sch ref

44	5a(iv): Amortisation of Revaluations			(\$000)
45				
46	Opening sum of RAB values without revaluations	179,431		
47				
48	Adjusted depreciation	8,549		
49	Total depreciation	9,960		
50	Amortisation of revaluations		1,411	
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	(18,930)		
61				
62	plus Tax effect of adjusted depreciation	2,394		
63				
64	less Tax effect of tax depreciation	1,634		
65				
66	plus Tax effect of other temporary differences*	(1,303)		
67				
68	less Tax effect of amortisation of initial differences in asset values	1,144		
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			(20,596)
77				
78	5a(vii): Disclosure of Temporary Differences			
79	<i>In Schedule 14, Box 6, provide descriptions and workings of items recorded in the asterisked category in Schedule 5a(vi) (Tax effect of other temporary differences).</i>			
80				
81	5a(viii): Regulatory Tax Asset Base Roll-Forward			(\$000)
82				
83	Opening sum of regulatory tax asset values	59,824		
84	less Tax depreciation	5,834		
85	plus Regulatory tax asset value of assets commissioned	14,968		
86	less Regulatory tax asset value of asset disposals	30		
87	plus Lost and found assets adjustment	93		
88	plus Adjustment resulting from asset allocation	(153)		
89	plus Other adjustments to the RAB tax value	–		
90	Closing sum of regulatory tax asset values			68,867

Company Name **The Lines Company 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

5b(i): Summary—Related Party Transactions

	(\$000)	(\$000)
Total regulatory income		14
Market value of asset disposals		
Service interruptions and emergencies	—	
Vegetation management	—	
Routine and corrective maintenance and inspection	—	
Asset replacement and renewal (opex)	—	
Network opex		—
Business support	1,894	
System operations and network support	—	
Operational expenditure		1,894
Consumer connection	—	
System growth	—	
Asset replacement and renewal (capex)	—	
Asset relocations	—	
Quality of supply	—	
Legislative and regulatory	—	
Other reliability, safety and environment	—	
Expenditure on non-network assets		—
Expenditure on assets		—
Cost of financing		
Value of capital contributions		
Value of vested assets		
Capital Expenditure		—
Total expenditure		1,894
Other related party transactions		69

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

Name of related party	Nature of opex or capex service provided	Total value of transactions (\$000)
Influx Energy Corporation	Business support	1,682
Maru Energy Trust	Business support	212
	[Select one]	
	[Select one]	
	[Select one]	
	[Select one]	
	[Select one]	
	[Select one]	
	[Select one]	
	[Select one]	
	[Select one]	
	[Select one]	
	[Select one]	
	[Select one]	
	[Select one]	
Total value of related party transactions		1,894

* include additional rows if needed

Company Name **The Lines Company Limited**
 For Year Ended **31 March 2022**

SCHEDULE 5c: REPORT ON TERM CREDIT SPREAD DIFFERENTIAL ALLOWANCE

This schedule is only to be completed if, as at the date of the most recently published financial statements, the weighted average original tenor of the debt portfolio (both qualifying debt and non-qualifying debt) is greater than five years.

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

sch ref

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

Issuing party	Issue date	Pricing date	Original tenor (in years)	Coupon rate (%)	Book value at issue date (NZD)	Book value at date of financial statements (NZD)	Term Credit Spread Difference	Debt issue cost readjustment
N/A								
* include additional rows if needed						–	–	–

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

Gross term credit spread differential

–

Total book value of interest bearing debt

Leverage

42%

Average opening and closing RAB values

Attribution Rate (%)

–

Term credit spread differential allowance

–

Company Name **The Lines Company 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

5d(i): Operating Cost Allocations

		Value allocated (\$000s)				
	Arm's length deduction	Electricity distribution services	Non-electricity distribution services	Total	OVABAA allocation increase (\$000s)	
Service interruptions and emergencies						
Directly attributable		1,945				
Not directly attributable				–		
Total attributable to regulated service		1,945				
Vegetation management						
Directly attributable		1,571				
Not directly attributable				–		
Total attributable to regulated service		1,571				
Routine and corrective maintenance and inspection						
Directly attributable		1,719				
Not directly attributable				–		
Total attributable to regulated service		1,719				
Asset replacement and renewal						
Directly attributable		411				
Not directly attributable				–		
Total attributable to regulated service		411				
System operations and network support						
Directly attributable		2,931				
Not directly attributable				–		
Total attributable to regulated service		2,931				
Business support						
Directly attributable		2,173				
Not directly attributable		5,467	2,756	8,223		
Total attributable to regulated service		7,640				
Operating costs directly attributable						
		10,751				
Operating costs not directly attributable	–	5,467	2,756	8,223	–	
Operational expenditure		16,217				

Company Name **The Lines Company 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

5d(ii): Other Cost Allocations

Pass through and recoverable costs

(\$000)

Pass through costs

Directly attributable

499

Not directly attributable

Total attributable to regulated service

499

Recoverable costs

Directly attributable

6,020

Not directly attributable

Total attributable to regulated service

6,020

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

(\$000)

Change in cost allocation 1

Cost category

Original allocator or line items

New allocator or line items

Original allocation

New allocation

Difference

CY-1

Current Year (CY)

—

—

Rationale for change

(\$000)

Change in cost allocation 2

Cost category

Original allocator or line items

New allocator or line items

Original allocation

New allocation

Difference

CY-1

Current Year (CY)

—

—

Rationale for change

(\$000)

Change in cost allocation 3

Cost category

Original allocator or line items

New allocator or line items

Original allocation

New allocation

Difference

CY-1

Current Year (CY)

—

—

Rationale for change

(\$000)

Change in cost allocation 4

Cost category

Original allocator or line items

Original allocation

New allocation

CY-1

Current Year (CY)

Company Name **The Lines Company 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

82	New allocator or line items		Difference	-	-
83					
84	Rationale for change				
85					
86					
87					
88	Change in cost allocation 5				
89	Cost category		Original allocation	CY-1	Current Year (CY)
90	Original allocator or line items		New allocation		
91	New allocator or line items		Difference	-	-
92					
93	Rationale for change				
94					
95					
96					
97	Change in cost allocation 6				
98	Cost category		Original allocation	CY-1	Current Year (CY)
99	Original allocator or line items		New allocation		
100	New allocator or line items		Difference	-	-
101					
102	Rationale for change				
103					
104					
105					
106	Change in cost allocation 7				
107	Cost category		Original allocation	CY-1	Current Year (CY)
108	Original allocator or line items		New allocation		
109	New allocator or line items		Difference	-	-
110					
111	Rationale for change				
112					

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

† include additional rows if needed

Company Name

The Lines Company 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	20,531
Not directly attributable	
Total attributable to regulated service	20,531
Subtransmission cables	
Directly attributable	831
Not directly attributable	
Total attributable to regulated service	831
Zone substations	
Directly attributable	37,966
Not directly attributable	
Total attributable to regulated service	37,966
Distribution and LV lines	
Directly attributable	95,533
Not directly attributable	
Total attributable to regulated service	95,533
Distribution and LV cables	
Directly attributable	24,569
Not directly attributable	
Total attributable to regulated service	24,569
Distribution substations and transformers	
Directly attributable	35,743
Not directly attributable	
Total attributable to regulated service	35,743
Distribution switchgear	
Directly attributable	23,081
Not directly attributable	
Total attributable to regulated service	23,081
Other network assets	
Directly attributable	9,435
Not directly attributable	
Total attributable to regulated service	9,435
Non-network assets	
Directly attributable	1,736
Not directly attributable	1,438
Total attributable to regulated service	3,175
Regulated service asset value directly attributable	249,426
Regulated service asset value not directly attributable	1,438
Total closing RAB value	250,864

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

			(\$000)	
			CY-1	Current Year (CY)
Change in asset value allocation 1				
Asset category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				
Change in asset value allocation 2				
Asset category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				
Change in asset value allocation 3				
Asset category		Original allocation		
Original allocator or line items		New allocation		
New allocator or line items		Difference	–	–
Rationale for change				

* a change in asset allocation must be completed for each allocator or component change that has occurred in the disclosure year. A movement in an allocator metric is not a change in allocator or compone

† include additional rows if needed

Company Name

The Lines Company 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		569
9	System growth		3,440
10	Asset replacement and renewal		8,194
11	Asset relocations		119
12	Reliability, safety and environment:		
13	Quality of supply	1,239	
14	Legislative and regulatory	–	
15	Other reliability, safety and environment	501	
16	Total reliability, safety and environment		1,740
17	Expenditure on network assets		14,062
18	Expenditure on non-network assets		1,862
19			
20	Expenditure on assets		15,924
21	plus Cost of financing		420
22	less Value of capital contributions		59
23	plus Value of vested assets		
24			
25	Capital expenditure		16,285
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	Non Standard Customer Connection	569	
33			
34			
35			
36			
37	* include additional rows if needed		
38	Consumer connection expenditure		569
39			
40	less Capital contributions funding consumer connection expenditure	59	
41	Consumer connection less capital contributions		510
42	6a(iv): System Growth and Asset Replacement and Renewal		
43		System Growth	Asset Replacement and Renewal
44		(\$000)	(\$000)
45	Subtransmission	167	1,235
46	Zone substations	2,244	539
47	Distribution and LV lines	6	4,460
48	Distribution and LV cables	188	359
49	Distribution substations and transformers	96	416
50	Distribution switchgear	45	831
51	Other network assets	693	354
52	System growth and asset replacement and renewal expenditure	3,440	8,194
53	less Capital contributions funding system growth and asset replacement and renewal		
54	System growth and asset replacement and renewal less capital contributions	3,440	8,194
55			
56	6a(v): Asset Relocations		
57	Project or programme*	(\$000)	(\$000)
58	Equipment Relocations - Miscellaneous	119	
59			
60			
61			
62			
63	* include additional rows if needed		
64	All other projects or programmes - asset relocations		
65	Asset relocations expenditure		119
66	less Capital contributions funding asset relocations		
67	Asset relocations less capital contributions		119

Company Name

The Lines Company 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

6a(vi): Quality of Supply

Project or programme*

11kV Fdr Dev - Switch Automation and Renewal

Sub & 33 Dev - 33kV Lines

Sub & 33 Dev - Substations

11kV Fdr Dev - Feeder development

Sub & 33 Dev - Supply Points

* include additional rows if needed

All other projects programmes - quality of supply

Quality of supply expenditure

less Capital contributions funding quality of supply

Quality of supply less capital contributions

(\$000)

(\$000)

450

60

584

9

135

1,239

1,239

6a(vii): Legislative and Regulatory

Project or programme*

* include additional rows if needed

All other projects or programmes - legislative and regulatory

Legislative and regulatory expenditure

less Capital contributions funding legislative and regulatory

Legislative and regulatory less capital contributions

(\$000)

(\$000)

-

-

6a(viii): Other Reliability, Safety and Environment

Project or programme*

Tx & Service Boxes - GMT

Sub & 33 Dev - Substations

Sub & 33 Dev - 33kV Lines

11kV Fdr Dev - Switchgear for Safety

* include additional rows if needed

All other projects or programmes - other reliability, safety and environment

Other reliability, safety and environment expenditure

less Capital contributions funding other reliability, safety and environment

Other reliability, safety and environment less capital contributions

(\$000)

(\$000)

455

26

17

3

501

501

6a(ix): Non-Network Assets**Routine expenditure**

Project or programme*

Computers

Furniture and Fittings

Intangibles

Motor Vehicles

Office equipment

Plant

Buildings

* include additional rows if needed

All other projects or programmes - routine expenditure

Routine expenditure

Atypical expenditure

Project or programme*

Lidar Survey and Database

* include additional rows if needed

All other projects or programmes - atypical expenditure

Atypical expenditure

Expenditure on non-network assets

(\$000)

(\$000)

45

56

254

161

47

50

291

904

(\$000)

(\$000)

958

958

1,862

Company Name **The Lines Company Limited**
 For Year Ended **31 March 2022**

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

This schedule requires a breakdown of operational expenditure incurred in the disclosure year.

EDBs must provide explanatory comment on their operational expenditure in Schedule 14 (Explanatory notes to templates). This includes explanatory comment on any atypical operational expenditure and assets replaced or renewed as part of asset replacement and renewal operational expenditure, and additional information on insurance.

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

sch ref

		(\$000)	(\$000)
7	6b(i): Operational Expenditure		
8	Service interruptions and emergencies	1,945	
9	Vegetation management	1,571	
10	Routine and corrective maintenance and inspection	1,719	
11	Asset replacement and renewal	411	
12	Network opex		5,646
13	System operations and network support	2,931	
14	Business support	7,640	
15	Non-network opex		10,571
16			
17	Operational expenditure		16,217
18	6b(ii): Subcomponents of Operational Expenditure (where known)		
19	Energy efficiency and demand side management, reduction of energy losses		63
20	Direct billing*		1,268
21	Research and development		—
22	Insurance		391
23	* Direct billing expenditure by suppliers that directly bill the majority of their consumers		

Company Name

The Lines Company 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	40,135	40,742	2%
9	7(ii): Expenditure on Assets	Forecast (\$000) ²	Actual (\$000)	% variance
10	Consumer connection	1,224	569	(54%)
11	System growth	2,605	3,440	32%
12	Asset replacement and renewal	7,697	8,194	6%
13	Asset relocations	592	119	(80%)
14	Reliability, safety and environment:			
15	Quality of supply	602	1,239	106%
16	Legislative and regulatory	–	–	–
17	Other reliability, safety and environment	6,383	501	(92%)
18	Total reliability, safety and environment	6,985	1,740	(75%)
19	Expenditure on network assets	19,103	14,062	(26%)
20	Expenditure on non-network assets	976	1,862	91%
21	Expenditure on assets	20,079	15,924	(21%)
22	7(iii): Operational Expenditure			
23	Service interruptions and emergencies	1,481	1,945	31%
24	Vegetation management	1,465	1,571	7%
25	Routine and corrective maintenance and inspection	1,289	1,719	33%
26	Asset replacement and renewal	242	411	70%
27	Network opex	4,477	5,646	26%
28	System operations and network support	7,275	2,931	(60%)
29	Business support	2,070	7,640	269%
30	Non-network opex	9,345	10,571	13%
31	Operational expenditure	13,822	16,217	17%
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	63	–	–
39	Direct billing	1,419	1,268	(11%)
40	Research and development	–	–	–
41	Insurance	431	391	(9%)
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)			

[illegible]

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

[illegible]

[illegible]

[illegible]

Company Name

The Lines Company 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

						Items at start of year (quantity)	Items at end of year (quantity)	Net change	Data accuracy (1-4)
	Voltage	Asset category	Asset class	Units					
8	All	Overhead Line	Concrete poles / steel structure	No.		23,727	24,292	565	3
9	All	Overhead Line	Wood poles	No.		10,590	10,272	(318)	2
10	All	Overhead Line	Other pole types	No.		—	—	—	N/A
11	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km		451	451	0	2
12	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km		—	—	—	N/A
13	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km		11	12	1	3
14	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km		—	—	—	N/A
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km		—	—	—	N/A
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km		—	—	—	N/A
17	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km		—	—	—	N/A
18	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km		—	—	—	N/A
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km		—	—	—	N/A
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km		—	—	—	N/A
21	HV	Subtransmission Cable	Subtransmission submarine cable	km		—	—	—	N/A
22	HV	Zone substation Buildings	Zone substations up to 66kV	No.		22	25	3	4
23	HV	Zone substation Buildings	Zone substations 110kV+	No.		—	—	—	N/A
24	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.		—	—	—	N/A
25	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.		1	1	—	4
26	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.		—	—	—	N/A
27	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.		212	201	(11)	3
28	HV	Zone substation switchgear	33kV RMU	No.		7	26	19	3
29	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.		—	—	—	N/A
30	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.		77	76	(1)	3
31	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.		70	71	1	3
32	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.		65	52	(13)	3
33	HV	Zone Substation Transformer	Zone Substation Transformers	No.		46	47	1	4
34	HV	Distribution Line	Distribution OH Open Wire Conductor	km		2,135	2,165	30	2
35	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km		—	—	—	N/A
36	HV	Distribution Line	SWER conductor	km		949	953	4	2
37	HV	Distribution Cable	Distribution UG XLPE or PVC	km		133	197	64	2
38	HV	Distribution Cable	Distribution UG PILC	km		—	—	—	N/A
39	HV	Distribution Cable	Distribution Submarine Cable	km		—	—	—	N/A
40	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.		290	295	5	3
41	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.		4	4	—	3
42	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.		7,888	7,874	(14)	2
43	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.		72	74	2	3
44	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.		348	389	41	3
45	HV	Distribution Transformer	Pole Mounted Transformer	No.		4,945	5,001	56	2
46	HV	Distribution Transformer	Ground Mounted Transformer	No.		582	587	5	3
47	HV	Distribution Transformer	Voltage regulators	No.		40	41	1	3
48	HV	Distribution Substations	Ground Mounted Substation Housing	No.		—	—	—	3
49	LV	LV Line	LV OH Conductor	km		499	479	(20)	2
50	LV	LV Cable	LV UG Cable	km		182	183	1	2
51	LV	LV Street lighting	LV OH/UG Streetlight circuit	km		78	80	2	2
52	LV	Connections	OH/UG consumer service connections	No.		4,164	4,182	18	2
53	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.		283	313	30	3
54	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot		1,016	1,097	81	3
55	All	Capacitor Banks	Capacitors including controls	No.		12	12	—	4
56	All	Load Control	Centralised plant	Lot		14	14	—	3
57	All	Load Control	Relays	No.		5,813	5,813	—	3
58	All	Civils	Cable Tunnels	km		—	—	—	N/A

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.

[illegible]

Company Name

The Lines Company 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

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

30

31

32

33

34

35

Circuit length by operating voltage (at year end)

> 66kV

50kV & 66kV

33kV

SWER (all SWER voltages)

22kV (other than SWER)

6.6kV to 11kV (inclusive—other than SWER)

Low voltage (< 1kV)

Total circuit length (for supply)

Dedicated street lighting circuit length (km)

Circuit in sensitive areas (conservation areas, iwi territory etc) (km)

Overhead circuit length by terrain (at year end)

Urban

Rural

Remote only

Rugged only

Remote and rugged

Unallocated overhead lines

Total overhead length

Length of circuit within 10km of coastline or geothermal areas (where known)

Overhead circuit requiring vegetation management

Overhead (km)	Underground (km)	Total circuit length (km)
—	—	—
—	—	—
451	12	463
953	—	953
—	—	—
2,165	197	2,362
479	183	662
4,048	392	4,440

32	48	80
		609

Circuit length (km)	(% of total overhead length)
490	12%
2,942	73%
234	6%
294	7%
88	2%
1	0%
4,048	100%

Circuit length (km)	(% of total circuit length)
241	5%

Circuit length (km)	(% of total overhead length)
609	15%

Company Name	The Lines Company 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	N/A		
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

The Lines Company 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

9e(i): Consumer Connections

Number of ICPs connected in year by consumer type

Consumer types defined by EDB*

Standard: Service Level Urban A
Standard: Service Level Rural B
Standard: Service Level Rural C
Standard: Service Level Rural D
Standard: Service Level Remote Rural E
Standard: Service Level Remote Rural F

Connections total

Number of
connections (ICPs)

56
8
33
54
6
6
163

Distributed generation

Number of connections made in year

Capacity of distributed generation installed in year

29	connections
0.27	MVA

9e(ii): System Demand**Maximum coincident system demand**

GXP demand

plus Distributed generation output at HV and above

Maximum coincident system demand

less Net transfers to (from) other EDBs at HV and above

Demand on system for supply to consumers' connection pointsDemand at time
of maximum
coincident
demand (MW)

74
5
78
-
78

Electricity volumes carried

Electricity supplied from GXPs

less Electricity exports to GXPs

plus Electricity supplied from distributed generation

less Net electricity supplied to (from) other EDBs

Electricity entering system for supply to consumers' connection points

less Total energy delivered to ICPs

Electricity losses (loss ratio)**Load factor**

Energy (GWh)

323
4
64
(11)
393
368
25

6.4%

0.57

9e(iii): Transformer Capacity

Distribution transformer capacity (EDB owned)

Distribution transformer capacity (Non-EDB owned, estimated)

Total distribution transformer capacity**Zone substation transformer capacity**

(MVA)

255
12
267
235

Company Name **The Lines Company 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

10(i): Interruptions**Interruptions by class****Number of interruptions**

Class A (planned interruptions by Transpower)
 Class B (planned interruptions on the network)
 Class C (unplanned interruptions on the network)
 Class D (unplanned interruptions by Transpower)
 Class E (unplanned interruptions of EDB owned generation)
 Class F (unplanned interruptions of generation owned by others)
 Class G (unplanned interruptions caused by another disclosing entity)
 Class H (planned interruptions caused by another disclosing entity)
 Class I (interruptions caused by parties not included above)

4
205
846
4
–
–
1
5
153
1,218

Total**Interruption restoration****≤3Hrs >3hrs**

Class C interruptions restored within

530	316
-----	-----

SAIFI and SAIDI by class**SAIFI SAIDI**

Class A (planned interruptions by Transpower)
 Class B (planned interruptions on the network)
 Class C (unplanned interruptions on the network)
 Class D (unplanned interruptions by Transpower)
 Class E (unplanned interruptions of EDB owned generation)
 Class F (unplanned interruptions of generation owned by others)
 Class G (unplanned interruptions caused by another disclosing entity)
 Class H (planned interruptions caused by another disclosing entity)
 Class I (interruptions caused by parties not included above)

0.0867	1.21
0.3834	118.15
2.9673	217.25
0.3920	30.00
–	–
–	–
0.0025	0.16
0.0008	0.18
0.0945	27.38
3.9272	394.33

Total**Normalised SAIFI and SAIDI****Normalised SAIFI Normalised SAIDI**

Classes B & C (interruptions on the network)

3.3507	335.41
--------	--------

Company Name **The Lines Company 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.

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

Lightning	0.0094	1.78
Vegetation	0.2784	45.55
Adverse weather	0.4190	55.63
Adverse environment	0.0306	0.34
Third party interference	0.2546	10.85
Wildlife	0.2609	7.46
Human error	0.0738	5.00
Defective equipment	0.8580	67.84
Cause unknown	0.7828	22.81

10(iii): Class B Interruptions and Duration by Main Equipment Involved**Main equipment involved****SAIFI****SAIDI**

Subtransmission lines	0.0049	1.04
Subtransmission cables	0.0000	0.00
Subtransmission other	0.0000	0.00
Distribution lines (excluding LV)	0.3785	117.12
Distribution cables (excluding LV)	0.0000	0.00
Distribution other (excluding LV)	0.0000	0.00

10(iv): Class C Interruptions and Duration by Main Equipment Involved**Main equipment involved****SAIFI****SAIDI**

Subtransmission lines	1.4461	34.95
Subtransmission cables	0.0000	0.00
Subtransmission other	0.0000	0.00
Distribution lines (excluding LV)	1.3870	172.79
Distribution cables (excluding LV)	0.1341	9.51
Distribution other (excluding LV)	0.0000	0.00

10(v): Fault Rate**Main equipment involved****Number of Faults****Circuit length
(km)****Fault rate (faults
per 100km)**

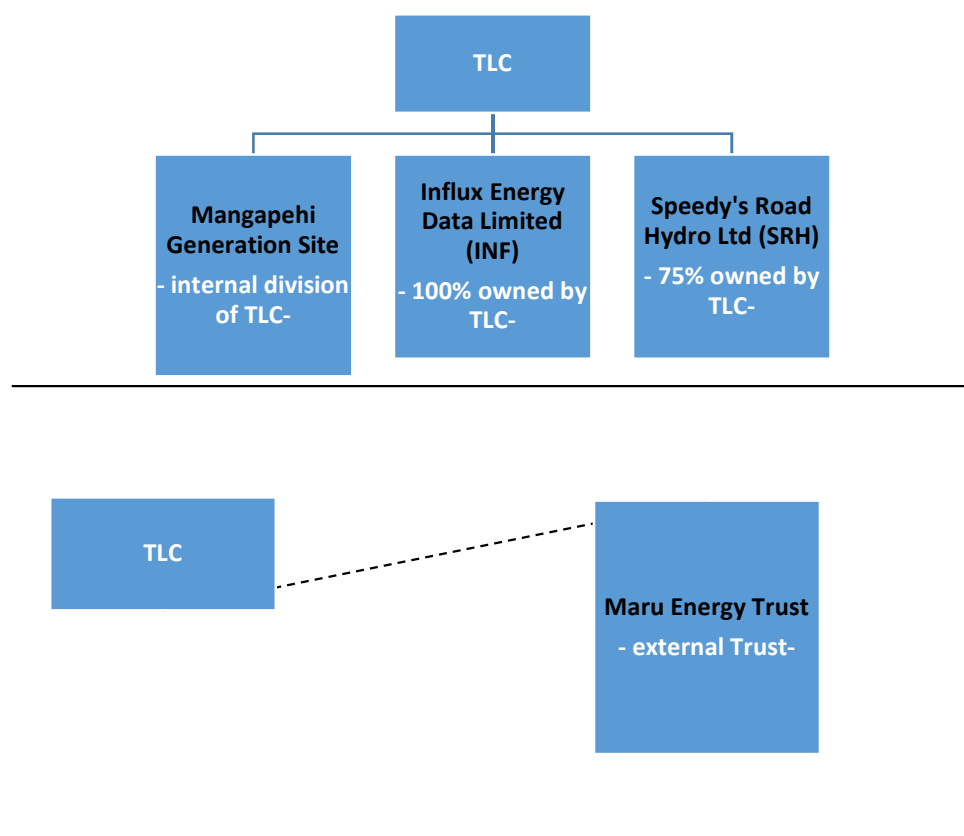
Subtransmission lines	41	451	9.09
Subtransmission cables	0	12	–
Subtransmission other	0		
Distribution lines (excluding LV)	801	3,118	25.69
Distribution cables (excluding LV)	4	197	2.03
Distribution other (excluding LV)	0		
Total	846		

Company Name	<u>The Lines Company</u>
For Year Ended	<u>31 March 2022</u>

APPENDIX A – AUDITED SCHEDULES

Clause 2.3.8 (1) – (3)

Related party structure



Mangapehi Generation Site

TLC has an internal generation division called Mangapehi. Mangapehi generates electricity from a hydro scheme on the North Island. This Hydro scheme is on the King Country Network. The asset was sold in July 2021.

The following transactions occurred between The Lines Company Limited Mangapehi:

1. Lines charges paid to TLC - \$6K
2. ACOT charges paid by TLC - \$25K

Influx Energy Data Limited (INF)

Influx Energy Data Limited Limited is a 100% owned subsidiary specialising in the supply of metering equipment, data and associated services to retailers, developers and lines companies throughout New Zealand. INF is responsible for supplying all meters on our network.

1. Meter Leasing - \$1.7m

Speedy's Road Hydro Ltd (SRH)

TLC owns 75% stake in Speedy's Road Hydro Ltd. SRH generates electricity from a hydro scheme on the North Island. This Hydro scheme is on the King Country Network. The generation assets were sold in July 2021,

The following transactions occurred between The Lines Company Limited and Speedy's Road Hydro Limited:

3. Lines charges paid to TLC - \$8K
4. ACOT charges paid by TLC - \$44K

Maru Energy Trust

TLC supports the Maru Energy Trust via an annual donation. Maru Energy Trust is a not-for-profit charitable trust to assist families in energy saving measures to heat their homes. TLC has no ownership in the trust.

Clause 2.3.12(1)

Name of related party	Nature of opex or capex services provided	Total value of transactions (\$'000)	Revenue/Cost implication
SRH	Lines charges paid by SRH to TLC	8	Revenue
		8	
INF	Meter lease charges have been included from 1 October 2018 with the change in pricing methodology	1,682	Cost
		1,682	
SRH	ACOT	44	Cost
		44	
TLC	Donations to Maru Energy Trust	212	Cost
	Mangepehi ACOT	25	Cost
	Mangepehi lines charges	6	Revenue
		243	

Company Name

The Lines Company

For Year Ended

31 March 2022

Schedule 14 Mandatory Explanatory Notes

(Guidance Note: Schedules 14, 14a and 15 are from the Electricity Distribution Information Disclosure Determination 2012 – as amended and consolidated 3 April 2018. Clause references in this template are to that determination)

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

The ROI-comparable to a post-tax WACC has increase to 9.34% (2021: 3.61%) in the current regulatory year. This is an increase of 5.73% and is primarily due to the increase in the revaluation from \$3.2m to \$15.6m allocated to regulatory profit. The revaluation increase is due the much higher CPI of 6.93% compared to forecasted CPI of 2%.

The ROI-comparable to a post-tax WACC is 2.30% if revaluations are excluded.

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

Regulatory profit for the year ended 31 March 2022 was \$20.5m. This represents an increase of \$12.6m from the previous year (31 March 2021 – \$7.9m).

The revaluation amount allocated to regulated profit totalled \$15.6m being an increase of \$12.5m compared to the prior year. The revaluation increase is due the much higher CPI of 6.93% compared to forecasted CPI of 2%.

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

Not applicable.

Value of the Regulatory Asset Base (Schedule 4)

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

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

The value of the regulatory asset base (schedule 4) has been completed in accordance with the Commerce Commission's requirements.

The revaluation of the RAB has resulted in an impact of \$15.6m which is much higher than forecasted. CPI was 6.93% compared to a forecast of 2%.

There has been no change to the methodology of allocating non-network assets compared to the prior year.

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

8. In the box below, provide descriptions and workings of the material items recorded in the following asterisked categories of 5a(i) of Schedule 5a-
- 8.1 Income not included in regulatory profit / (loss) before tax but taxable;
 - 8.2 Expenditure or loss in regulatory profit / (loss) before tax but not deductible;
 - 8.3 Income included in regulatory profit / (loss) before tax but not taxable;
 - 8.4 Expenditure or loss deductible but not in regulatory profit / (loss) before tax.

Box 5: Regulatory tax allowance: permanent differences

Not applicable.

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)**Negative Temporary Differences (Gross values):**

- Opening accrued annual leave accrual - \$380k
- Opening long service leave accrual - \$25k
- Opening bonus provision accrual - \$53k
- Opening bad debt provision - \$44k
- Opening general provision - Nil
- Opening unrecognised capital contributions - (\$1,223k)
- Total negative Temporary Differences - \$721k
- Line renewal R&M deduction - \$4,675k

Positive Temporary Differences (Gross values):

- Closing accrued annual leave accrual - \$365k
- Closing long service leave accrual - \$25k
- Closing bonus provision accrual - \$19k
- Closing bad debt provision - \$37k
- Closing general provision - Nil
- Closing unrecognised capital contributions - (\$1,146k)
- Total positive Temporary Differences - (\$700k)

Net NEGATIVE temporary differences are \$4,654k, with a tax effect of \$1,303k.

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

Directly attributable costs include each TLC division or part thereof which has any regulatory business transactions, and each general ledger cost code that is allocated 100% to the regulatory business.

Directly attributable costs are primarily incurred in the functional areas of:

- Service interruptions and emergencies
- Vegetation management
- Routine and corrective maintenance and inspection
- Asset replacement and renewal
- Network operations and support
- Billing and Customer Services
- Regulatory Cost
- Cost associated with new pricing change
- Connection/Disconnection Expenses
- Costs associated with moving to retailer billing

TLC has opted to apply ABAA (Accounting based allocation approach) to allocate those operating costs not directly attributable to the regulatory business. The proxy allocation method was used to allocate operating costs for which a causal relationship cannot be established. The methodology behind the use of each proxy allocator is based on an analysis of each general ledger cost code that is not directly attributable to the regulatory business.

Not directly attributable costs primarily arise in the functional support areas of:

- Corporate Services which has a proxy cost allocator of total revenue
- Finance which has a proxy cost allocator of staff time
- Human Resources has a proxy allocator of headcount
- Information Technology has a proxy allocator of IT headcount
- Building (Head office) has a proxy allocator of headcount
- Public relations has a proxy allocator of staff time
- Metering revenue is 60% allocated to regulatory business as per the pricing methodology

The not directly attributable cost included in business support includes the following main cost categories below:

- Personnel costs
- Property costs
- Professional services fees
- Customer-related expenses

Cost allocations are based on the same logic as the prior year.

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

Directly attributable assets are those assets used wholly and solely in the conveyance of electricity or management of the electricity network. These have been allocated at 100% to the RAB.

TLC has opted to apply ABAA (Accounting based allocation approach) to allocate those assets not directly attributable to the regulatory business. The proxy allocation method was used to allocate operating costs for which a causal relationship cannot be established. The methodology behind the use of each proxy allocator is based on an analysis of each general ledger cost code that is not directly attributable to the regulatory business.

Not directly attributable costs primarily arise in the functional support areas of:

- Corporate Services which has a proxy cost allocator of total revenue
- Finance which has a proxy cost allocator of staff time
- Human Resources has a proxy allocator of headcount
- Information Technology has a proxy allocator of IT headcount
- Building (Head office) has a proxy allocator of headcount
- Public relations has a proxy allocator of staff time

Not directly attributable assets are non-system assets which include the following:

- Buildings
- Plant/Vehicles/Equipment
- Office Equipment & Furniture
- IT Equipment and Software
- Intangibles (leaseholds, easements, etc.)

The methodology for asset allocations for non-direct assets has not been changed compared to the prior year.

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

Schedule 6a projects and programmes are taken from the AMP Planning tools in the Asset Management software. They are summarised figures based on individual planning items excluding the small projects.

There has been no financial reclassification of items.

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, 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

Network operational expenditure is consistent in type with respect to routine system and network maintenance carried out. Material asset replacement and renewal expenditure pertains to battery replacement, transformer refurbishment and swap-outs.

For the period 1 April to 30 September 2021, TLC required monthly metering data to directly bill customers on kWh-based pricing. TLC charged customers directly for metering services, and the charges reflect the type of meter in use for each ICP. A portion of the total metering charge is attributed to non-regulated services (40%), as meters are also used for retail market services. Therefore, 60% of the cost associated with the metering cost is included in the business support OPEX category.

From 1 October 2021, TLC converted to retailer billing. The same metering cost was incurred as the data to validate retailer files and populate metering files where retailers had not.

There has been no financial reclassification of items.

There has been no atypical expenditure incurred.

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

Expenditure on assets

Total expenditure on assets for the period was 21% below the AMP forecast. Overall expenditure on assets was impacted by COVID-19. Jobs were re-prioritised during the year and where applicable certain capital works were delayed into FY23.

Network capital expenditure was 26% below forecast. Non-network expenditure was 91% above forecast. The Lidar Survey and Database (\$958k) has resulted in the non-network expenditure being over forecast by 91%. This was forecasted in other reliability, safety and environment category in the AMP.

Consumer Connections

Expenditure on customer connections was 54% below the forecast (\$655k). \$600k of the AMP forecast related to a customer which only \$261k of this work was completed. \$150k was forecasted for another customer of which \$60k was incurred. Expected emergent work from customer connections has been delayed due to COVID-19.

System growth

System growth was 32% above forecast (\$835k). Waitete substation expenditure was forecasted to be in other reliability, safety and environment category but was capitalised in system growth. Expenditure on this project was \$2.9million and split between quality of supply and system growth. Forecasted work on the Atimuri sub transformer replacement (\$1m) was postponed to FY23.

Asset Relocations

Expenditure on asset relocations was 80% below forecast (\$473k). \$350k was forecasted to be spent to replace voltage regulators at Bennydale. Only \$108k was spent in the year. Other relocated assets expenditure forecasted was postponed due to COVID-19.

Quality of supply

Quality of supply spending was 106% above forecast (\$637k) Waitete substation expenditure was forecasted to be in other reliability, safety and environment category but was capitalised in system growth. Expenditure on this project was \$2.9m and split between quality of supply and system growth.

Other reliability, safety and environment

Expenditure on other reliability, safety and environment was 75% below forecast (\$5.2m). Lidar Survey and Database expenditure was forecasted for in other reliability, safety and environment but has been capitalised in expenditure on non-network assets (\$958k). In addition \$1.2million was forecasted for Turangi zone substation which has been postponed to FY23. \$2m was forecasted for the Waitete substation and categorised in system growth. Expenditure for the year was 2.9m however this expenditure was capitalised in network systems growth and quality of supply.

Operational Expenditure

Total operational expenditure was 17% above than the forecast.

Network OPEX was 26% more than the forecast. Increased spend was seen across all network categories.

Service interruptions and emergencies

Service and interruptions and emergencies saw an increase of 31% compared to the AMP. Cyclone Dovi and other weather events during the year saw increased levels of interruption and emergency work.

Routine and corrective maintenance and inspection

Routine and corrective maintenance and inspection are higher by 33% due to scheduled work on Taharoa oil circuit breaker board and oil samples from zone substations and tap changes.

Asset replacement and renewal

Asset replacement and renewal costs have increased by 70% mainly due to a cable repair on the Taharoa 33kV cable.

Non-network OPEX was up by 13% compared to the overall forecast. It is noted that in the AMP there was a transposition of system operations and network support and business support thus showing material variances in each category. If the figures were entered into the correct boxes the variances would look like this.

Category	AMP (\$000)	Actual (\$000)	Variance %
System operations and network support	2,070	2,931	42%
Business support	7,275	7,640	5%

System operations and network support

Based on the above update, the 42% increase from forecast was due to \$84k expenditure on the section 98 investigation. In addition, labour recoveries recouped on capital expenditure were lower due to the reduced capital expenditure (\$214k). There have been changes to the staff complement to accommodate the changing landscape of network management resulting in a \$281k increase in costs.

Direct billing was less than forecast by 11%, the main contributor to this is natural staff attrition due to TLC moving towards retailer billing.

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

For the period 1 April 2021 to 31 March 2022, TLC's target revenue net of discounts was \$40.1m. Actual revenue was \$40.7m being 2% above the forecast.

Schedule 8 was prepared based on kWh quantities for the entire financial year being a combination of direct billing from 1 April 2021 to 30 September 2021 and retailer billing from 1 October 2021 to 31 March 2022.

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

A number of weather events like Cyclone Dovi contributed to an increased level of unplanned SAIDI and SAIFI, however the regulatory limits were not breached. These did impact services, interruptions and emergencies OPEX being over forecast by 31%.

Voluntary notes are provided in schedule 15.

Insurance cover

17. In the box below, provide details of any insurance cover for the assets used to provide electricity distribution services, including-

17.1 The EDB's approaches and practices in regard to the insurance of assets used to provide electricity distribution services, including the level of insurance;

17.2 In respect of any self insurance, the level of reserves, details of how reserves are managed and invested, and details of any reinsurance.

Box 14: Explanation of insurance cover

TLC has an insurance programme in place for selected network and non-network assets. This insurance programme is placed with a reputable insurer(s) organised by an independent broker. The insured assets covered under material damage, business interruption and machinery breakdown policies include:

- Ground-mounted substations and transformers
- Plant & equipment
- Vehicles
- Buildings
- Office equipment

The sum insured of assets is \$68.2m (excluding buildings).

TLC has a number of liability insurance policies to cover: Public liability, statutory liability, fidelity/theft, Professional indemnity and Directors & Officers' liability.

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

There have been no amendments to prior year numbers.

Company Name	The Lines Company
For Year Ended	31 March 2022

Schedule 14a Mandatory Explanatory Notes on Forecast Information

(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

Nominal Capital Expenditure forecasts for the CY+1 in Schedule 11a are the same.

The following increases have been applied to nominal forecasts for other years:

CY+2 3.01%
CY+3 1.99%
CY+4 2.01%
CY+5 onwards 1.97%

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 Capital Expenditure forecasts for the CY+1 in Schedule 11b are the same.

The following increases have been applied to nominal forecasts for other years:

CY+2 1.50%
CY+3 1.51%
CY+4 1.54%
CY+5 onwards 1.58%

Company Name	<u>The Lines Company</u>
For Year Ended	<u>31 March 2022</u>

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.)

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

Box 1: Voluntary explanatory comment on disclosed information

Schedule 10

TLC uses the BASIX computer program which has a connectivity model for an interruption. The module connects various assets and then runs a calculation that produces the accurate downstream ICP count from any isolation points. The ICP counts are then used to calculate regulatory performance indicators. Customer numbers are transferred automatically from the billing system regularly. The BASIX data cleaning program has made interruption-related calculations more accurate and reliable than before. The company is reliant on third parties to notify it of interruptions and control over ICP data is also limited.

Normalised SAIFI and SAIDI

The figures shown in Row 37 “Classes B & C (interruptions on the network)” are calculated using Information Disclosure Determination which does not distinguish treatment of planned versus unplanned interruptions and uses boundary values based on 2004-2009 interruption data. As such, they are different to the metrics disclosed in the Default Price Quality Path (DPP) Compliance Statement RY2022.

Exemption related to Schedule 10 - Network reliability and note on director certification

On 17 May 2021, the Commerce Commission released a document [ID-Exemption-All-EDBs-Auditing-of-successive-interruptions-17-May-2021](#):

Information Disclosure exemption: Disclosure and auditing of reliability information within Schedule 10. The Commission granted all EDBs an exemption to facilitate completion and submission of the 2021 and 2022 year-end disclosures. The exemption granted was:

6. Under clause 2.11.1 of the ID Determination, the Commission grants all EDBs an exemption for the 2021 and 2022 disclosure years, subject to the condition at paragraph 7 of this letter, from:

6.1 the requirement that the assurance report required to be procured by clause 2.8.1(1) of the ID determination in respect of the information in Schedule 10 of the ID determination must take into account any issues arising out of the EDB's recording of SAIDI, SAIFI and number of interruptions due to successive interruptions.

7. This exemption is granted on the condition that:

7.1 For both the 2021 and 2022 disclosure years, EDBs must complete and disclose under Schedule 15, as part of their disclosures under the ID Determination, the following information:

7.1.1 whether successive interruptions have been treated in the same way for the current disclosure year as they were for the previous disclosure year;

7.1.2 if successive interruptions were treated differently for the current disclosure year than they were for the previous disclosure year, provide an explanation of the nature of and reasons for the change; and

7.1.3 the process applied in recognising, or not recognising, successive interruptions following an initial interruption.

The Lines Company Limited has continued to treat successive interruptions in the same way for the

2022 disclosure year as they were for the 2021 disclosure year:

- For interruptions with a duration of less than one minute, they are recorded but are not counted in TLC's disclosures;
- Where an interruption is a successive interruption i.e. it is apparent that the same customer group has experienced a repeat interruption from the same initial cause, SAIFI values are set to zero for the successive interruption and are not counted.

Schedule 18 Certification for Year-end Disclosures

Clause 2.9.2 of section 2.9

We, Bella Takiari-Brame and Michael Underhill, being directors of The Lines Company 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 Lines Company 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.



Bella Takiari-Brame
Director



Michael Underhill
Director

24 August 2022

On 17 May 2021, the Commission Commerce released a document:

To: All suppliers of electricity distribution services as regulated under Part 4 of the Commerce Act 1986: titled, *Information Disclosure exemption: Disclosure and auditing of reliability information within Schedule 10.*

The Commission granted all EDBs an exemption for the 2022 disclosure year, subject to the condition at paragraph 7 of the letter, from:

- the requirement that the assurance report required to be procured by clause 2.8.1(1) of the ID determination in respect of the information in Schedule 10 of the ID determination must take into account

any issues arising out of the EDB's recording of SAIDI, SAIFI and number of interruptions due to successive interruptions.

The exemption is granted on the condition that:

- For both the 2021 and 2022 disclosure years, EDBs must complete and disclose under Schedule 15, as part of their disclosures under the ID Determination, the following information:
 - whether successive interruptions have been treated in the same way for the current disclosure year as they were for the previous disclosure year;
 - if successive interruptions were treated differently for the current disclosure year than they were for the previous disclosure year, provide an explanation of the nature of and reasons for the change; and
 - the process applied in recognising, or not recognising, successive interruptions following an initial outage.

The Directors of The Lines Company Limited note that they have not been provided a comparable exemption from:

- the requirement that the certificate required by clause 2.9.2 of the ID determination in respect of clause 2.5.1(1)(f), the information in Schedule 10 of the ID determination, must take into account any issues arising out of the EDB's recording of SAIDI, SAIFI and number of interruptions due to successive interruptions.

The Directors of The Lines Company Limited certify that:

- The Lines Company Limited has continued to treat successive interruptions in the same way for the 2022 disclosure year as they were for the 2021 disclosure year.



Independent assurance report

To the Directors of The Lines Company 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 Lines Company 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, Pip Cameron, 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.
- 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 of 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 of 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 required to be disclosed in Schedules 10(i) to 10(iv). Consequently, there is no independent evidence available to support the completeness and accuracy of recorded faults, and control over the completeness and accuracy of interconnection point ('ICP') data included in the SAIDI and SAIFI calculations 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 ICPs affected and duration of the interruptions 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



obtain sufficient appropriate evidence to confirm the accuracy of the data that forms the basis of the compilation of Schedules 10(i) to 10(iv).

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 that we 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.

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.	<p>We have obtained an understanding of the compliance requirements relevant to the RAB as set out in the Determination and the IM Determination.</p> <p>Our procedures included the following:</p> <p>Assets commissioned</p> <ul style="list-style-type: none">• We reconciled the assets commissioned, as per the regulatory fixed asset register, to the asset additions disclosed in the audited 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; <p>Depreciation</p> <ul style="list-style-type: none">• We compared the standard asset lives by asset category to those set out in the IM Determination;• For assets with no standard asset lives we assessed the reasonableness of the lives used by reference to the accounting depreciation rates;• We compared the spreadsheet formula utilised to calculate regulatory depreciation expense with IM Determination clause 2.2.5;

Key Assurance Matter	How our procedures addressed the key assurance matter
<p>Cost and Asset Allocation</p> <p>The Determination relates to information concerning the supply of electricity distribution services. In addition to the regulated support of electricity, the Company also supplies customers with other unregulated services such as contracting, metering and generation services.</p> <p>Costs and asset values that relate to electricity distribution services regulated under the ID Determination should comprise:</p> <ul style="list-style-type: none"> • all of the costs directly attributable to the regulated goods or services; and • an allocated portion of the costs that are not directly attributable. <p>The IM Determination set out rules and processes for allocating costs and assets which are not directly attributable to either regulated or unregulated services. A number of screening tests apply which must be considered when deciding on the appropriate allocation method.</p>	<p>Revaluation</p> <ul style="list-style-type: none"> • We recalculated the revaluation rate set out in the Input Methodologies 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; and <p>Disposals</p> <ul style="list-style-type: none"> • We inspected material asset disposals within the accounting fixed asset register to ensure disposals in the RAB meet the definition of a disposal per the IM Determination.
<p>We have obtained an understanding of the Company's cost and asset allocation processes and the methodologies applied.</p> <p>Our procedures over cost and asset allocation included:</p> <ul style="list-style-type: none"> • Reconciling the regulated and unregulated financial information to the audited financial statements;' <p>Classification as directly/not directly attributable</p> <ul style="list-style-type: none"> • Considering the appropriateness of the costs allocated as directly attributable, based on the nature and our understanding of the business to determine the reasonableness of the directly attributable classification; • Testing a sample of transactions against supporting documentation to ensure their classification as either directly attributable or not directly attributable costs are appropriate and in line with the Determination; • Inspecting the fixed asset register to identify any asset classes which based on their nature and our understanding of the business could be considered assets directly attributable to a specific business unit; • Testing a sample of assets commissioned to supporting documentation to ensure their classification as either directly attributable or not directly attributable is appropriate and in line with the Determination; 	

Key Assurance Matter	How our procedures addressed the key assurance matter
<p>The Company has applied the Accounting -Based Allocation Approach Methodology (ABAA) utilising proxy cost and asset allocators to allocate the asset values and operating costs that are not directly attributable where causal relationships could not be identified.</p> <p>Given the judgement involved in the application of the cost and asset allocation methodologies we consider it a key assurance matter.</p>	<p>Appropriateness of the allocators used for not directly attributable costs and assets</p> <ul style="list-style-type: none"> • Understanding why causal relationships could not be identified in allocating costs or assets and ensuring appropriate disclosure has been included outlining these in Schedule 14; • Considering the appropriateness of the cost and asset proxy allocators used in applying the ABAA to not directly attributable costs; and • Recalculating the split between not directly attributable costs and asset values allocated to electricity distribution services and non-electricity distribution services.

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 respects:

- 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.

A handwritten signature in black ink, appearing to read 'Pip Cameron', with a stylized, flowing script.

Pip Cameron
PricewaterhouseCoopers
On behalf of the Auditor-General
Auckland, New Zealand
24 August 2022