



**Information Disclosure prepared  
Under Part 4 of the Commerce Act 1986**

**For the Assessment Period:  
1 April 2021 to 31 March 2022**



**EDB Information Disclosure Requirements  
Information Templates  
for  
Schedules 1–10**

Company Name

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

## 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 **Top Energy Limited**  
For Year Ended **31 March 2022**

## SCHEDULE 1: ANALYTICAL RATIOS

This schedule calculates expenditure, revenue and service ratios from the information disclosed. The disclosed ratios may vary for reasons that are company specific and, as a result, must be interpreted with care. The Commerce Commission will publish a summary and analysis of information disclosed in accordance with the ID determination. This will include information disclosed in accordance with this and other schedules, and information disclosed under the other requirements of the determination.

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

sch ref

### 1(i): Expenditure metrics

	Expenditure per GWh energy delivered to ICPs (\$/GWh)	Expenditure per average no. of ICPs (\$/ICP)	Expenditure per MW maximum coincident system demand (\$/MW)	Expenditure per km circuit length (\$/km)	Expenditure per MVA of capacity from EDB-owned distribution transformers (\$/MVA)
<b>Operational expenditure</b>	59,320	588	253,183	4,770	69,020
Network	21,750	216	92,831	1,749	25,307
Non-network	37,570	373	160,352	3,021	43,714
<b>Expenditure on assets</b>	41,879	415	178,742	3,368	48,727
Network	37,341	370	159,374	3,003	43,447
Non-network	4,538	45	19,368	365	5,280

### 1(ii): Revenue metrics

	Revenue per GWh energy delivered to ICPs (\$/GWh)	Revenue per average no. of ICPs (\$/ICP)
<b>Total consumer line charge revenue</b>	143,395	1,422
Standard consumer line charge revenue	157,385	1,345
Non-standard consumer line charge revenue	59,827	13,778

### 1(iii): Service intensity measures

Demand density	19	Maximum coincident system demand per km of circuit length (for supply) (kW/km)
Volume density	80	Total energy delivered to ICPs per km of circuit length (for supply) (MWh/km)
Connection point density	8	Average number of ICPs per km of circuit length (for supply) (ICPs/km)
Energy intensity	9,916	Total energy delivered to ICPs per average number of ICPs (kWh/ICP)

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

	(\$000)	% of revenue
Operational expenditure	19,565	40.63%
Pass-through and recoverable costs excluding financial incentives and wash-ups	7,522	15.62%
Total depreciation	12,210	25.36%
Total revaluations	20,839	43.28%
Regulatory tax allowance	3,090	6.42%
Regulatory profit/(loss) including financial incentives and wash-ups	26,605	55.25%
<b>Total regulatory income</b>	<b>48,152</b>	

### 1(v): Reliability

Interruption rate	19.21	Interruptions per 100 circuit km
-------------------	-------	----------------------------------

Company Name **Top Energy 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

CY-2 31 Mar 20 %	CY-1 31 Mar 21 %	Current Year CY 31 Mar 22 %
7.52%	3.61%	9.00%
7.52%	3.51%	8.91%
6.72%	3.65%	8.91%

#### Mid-point estimate of post tax WACC

25th percentile estimate  
75th percentile estimate

4.27%	3.72%	3.52%
3.59%	3.04%	2.84%
4.95%	4.40%	4.20%

#### 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

7.94%	3.95%	9.30%
7.94%	3.84%	9.21%
7.14%	3.98%	9.21%

#### WACC rate used to set regulatory price path

7.19%	4.57%	4.57%
-------	-------	-------

#### Mid-point estimate of vanilla WACC

25th percentile estimate  
75th percentile estimate

4.69%	4.05%	3.82%
4.01%	3.37%	3.14%
5.37%	4.73%	4.50%

### 2(ii): Information Supporting the ROI

(\$000)

Total opening RAB value  
plus Opening deferred tax

302,160	
(15,491)	
	286,669

#### Opening RIV

#### Line charge revenue

47,296

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

27,087	
9,230	
10	
1,326	
857	

#### Mid-year net cash outflows

36,777

#### 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

320,021	
11	
–	
(17,255)	

#### Closing RIV

302,755

#### ROI – comparable to a vanilla WACC

9.30%

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

42%  
2.55%  
28%

#### ROI – comparable to a post tax WACC

9.00%

Company Name **Top Energy 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						286,669
	Line charge revenue	Expenses cash outflow	Assets commissioned	Asset disposals	Other regulated income	Monthly net cash outflows
April	3,631	2,089	475	–	66	2,498
May	4,126	1,938	678	–	61	2,555
June	4,125	2,237	681	–	71	2,847
July	4,853	1,674	861	–	53	2,482
August	4,544	2,547	647	–	81	3,113
September	4,160	2,026	550	4	64	2,507
October	3,988	2,207	623	–	70	2,760
November	3,639	2,142	762	–	68	2,836
December	3,633	2,124	862	6	67	2,913
January	3,702	2,229	741	–	71	2,900
February	3,247	2,521	1,182	–	80	3,623
March	3,647	3,353	1,170	–	106	4,417
Total	47,296	27,087	9,230	10	857	35,451
Tax payments						1,326
Term credit spread differential allowance						–
Closing RIV						302,755
Monthly ROI – comparable to a vanilla WACC						9.37%
Monthly ROI – comparable to a post tax WACC						9.07%

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

Year-end ROI – comparable to a vanilla WACC	9.01%
Year-end ROI – comparable to a post tax WACC	8.71%

\* 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	–
Purchased assets – avoided transmission charge	–
Energy efficiency and demand incentive allowance	–
Quality incentive adjustment	358
Other financial incentives	–
Financial incentives	358
Impact of financial incentives on ROI	0.09%
Input methodology claw-back	–
CPP application recoverable costs	–
Catastrophic event allowance	–
Capex wash-up adjustment	(538)
Transmission asset wash-up adjustment	–
2013–15 NPV wash-up allowance	–
Reconsideration event allowance	–
Other wash-ups	546
Wash-up costs	8
Impact of wash-up costs on ROI	0.00%



Company Name **Top Energy 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

#### 3(i): Regulatory Profit

(\$000)

##### Income

Line charge revenue	47,296
plus Gains / (losses) on asset disposals	(352)
plus Other regulated income (other than gains / (losses) on asset disposals)	1,209

##### Total regulatory income

48,152

##### Expenses

less Operational expenditure	19,565
less Pass-through and recoverable costs excluding financial incentives and wash-ups	7,522

##### Operating surplus / (deficit)

21,065

less Total depreciation	12,210
-------------------------	--------

plus Total revaluations	20,839
-------------------------	--------

##### Regulatory profit / (loss) before tax

29,694

less Term credit spread differential allowance	–
--	---

less Regulatory tax allowance	3,090
-------------------------------	-------

##### Regulatory profit/(loss) including financial incentives and wash-ups

26,605

#### 3(ii): Pass-through and Recoverable Costs excluding Financial Incentives and Wash-Ups

(\$000)

##### Pass through costs

Rates	56
Commerce Act levies	114
Industry levies	114
CPP specified pass through costs	–

##### Recoverable costs excluding financial incentives and wash-ups

Electricity lines service charge payable to Transpower	4,829
Transpower new investment contract charges	–
System operator services	–
Distributed generation allowance	2,410
Extended reserves allowance	–
Other recoverable costs excluding financial incentives and wash-ups	–

##### Pass-through and recoverable costs excluding financial incentives and wash-ups

7,522

Company Name **Top Energy 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

#### 3(iii): Incremental Rolling Incentive Scheme

(\$000)

CY-1 CY  
 31 Mar 21 31 Mar 22

Allowed controllable opex

- -

Actual controllable opex

- -

Incremental change in year

-

Previous years' incremental change Previous years' incremental change adjusted for inflation

CY-5 31 Mar 17

- -

CY-4 31 Mar 18

- -

CY-3 31 Mar 19

- -

CY-2 31 Mar 20

- -

CY-1 31 Mar 21

- -

Net incremental rolling incentive scheme

-

Net recoverable costs allowed under incremental rolling incentive scheme

-

#### 3(iv): Merger and Acquisition Expenditure

(\$000)

Merger and acquisition expenditure

-

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)

#### 3(v): Other Disclosures

(\$000)

Self-insurance allowance

-

Company Name **Top Energy 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	237,830	251,488	261,426	280,006	302,160
less Total depreciation	8,681	9,155	9,683	11,409	12,210
plus Total revaluations	2,616	3,731	6,589	4,252	20,839
plus Assets commissioned	19,745	15,378	22,856	29,669	9,230
less Asset disposals	22	16	990	373	10
plus Lost and found assets adjustment	–	–	–	–	–
plus Adjustment resulting from asset allocation	(0)	(0)	(193)	17	11
Total closing RAB value	251,488	261,426	280,006	302,160	320,021

##### 4(ii): Unallocated Regulatory Asset Base

	Unallocated RAB *	RAB
	(\$000)	(\$000)
Total opening RAB value	302,287	302,160
less Total depreciation	12,252	12,210
plus Total revaluations	20,847	20,839
plus Assets commissioned (other than below)	9,267	9,230
Assets acquired from a regulated supplier	–	–
Assets acquired from a related party	–	–
Assets commissioned	9,267	9,230
less Asset disposals (other than below)	11	10
Asset disposals to a regulated supplier	–	–
Asset disposals to a related party	–	–
Asset disposals	11	10
plus Lost and found assets adjustment	–	–
plus Adjustment resulting from asset allocation		11
Total closing RAB value	320,138	320,021

\* 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 **Top Energy 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

66

67

68

69

70

71

72

73

74

75

CPI<sub>t</sub>

CPI<sub>t</sub><sup>4</sup>

Revaluation rate (%)

1,142

1,068

6.93%

Unallocated RAB \*

RAB

(\$000)

(\$000)

(\$000)

(\$000)

302,287

302,160

1,418

1,401

300,869

300,760

20,847

20,839

Total opening RAB value

less Opening value of fully depreciated, disposed and lost assets

Total opening RAB value subject to revaluation

Total revaluations

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

Unallocated works under

construction

Allocated works under construction

6,332

6,332

9,914

9,914

9,267

9,230

(37)

6,979

6,979

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

5.46%

Company Name **Top Energy 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)
12,252		12,210	
–		–	
–		–	
–		–	
	12,252		12,210

#### 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
<b>Total opening RAB value</b>	61,847	9,335	42,200	75,080	38,381	34,564	31,375	5,129	4,248	302,160
less Total depreciation	1,196	176	1,506	2,541	1,525	1,547	1,303	371	2,044	12,210
plus Total revaluations	4,285	647	2,924	5,202	2,659	2,391	2,155	355	221	20,839
plus Assets commissioned	255	–	33	4,987	1,404	856	873	211	612	9,230
less Asset disposals	–	–	–	–	–	–	–	–	10	10
plus Lost and found assets adjustment	–	–	–	–	–	–	–	–	–	–
plus Adjustment resulting from asset allocation	(0)	(0)	0	0	(0)	0	0	(0)	11	11
plus Asset category transfers	–	–	–	–	–	–	–	–	–	–
<b>Total closing RAB value</b>	65,191	9,805	43,651	82,729	40,918	36,265	33,100	5,324	3,038	320,021
<b>Asset Life</b>										
Weighted average remaining asset life	44.4	52.8	25.8	29.4	25.2	22.3	24.1	12.0	2.1	(years)
Weighted average expected total asset life	60.0	60.0	38.1	55.9	45.0	45.0	37.5	19.0	6.4	(years)

Company Name **Top Energy 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

### 5a(i): Regulatory Tax Allowance

(\$000)

#### Regulatory profit / (loss) before tax

29,694

- 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  
 Amortisation of revaluations

— \*  
 5 \*  
 3,399  
 1,807

5,211

- less* Total revaluations  
 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

20,839  
 — \*  
 — \*  
 — \*  
 3,032

23,871

#### Regulatory taxable income

11,035

- less* Utilised tax losses  
 Regulatory net taxable income

—  
 11,035

Corporate tax rate (%)

28%

#### Regulatory tax allowance

3,090

\* Workings to be provided in Schedule 14

### 5a(ii): Disclosure of Permanent Differences

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

### 5a(iii): Amortisation of Initial Difference in Asset Values

(\$000)

- Opening unamortised initial differences in asset values  
*less* Amortisation of initial differences in asset values  
*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

50,987  
 3,399  
 —  
 —  
 47,587

Opening weighted average remaining useful life of relevant assets (years)

15

Company Name **Top Energy 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	<b>5a(iv): Amortisation of Revaluations</b>			<b>(\$000)</b>
45				
46	Opening sum of RAB values without revaluations		264,717	
47				
48	Adjusted depreciation		10,403	
49	Total depreciation		12,210	
50	Amortisation of revaluations			1,807
51				
52	<b>5a(v): Reconciliation of Tax Losses</b>			<b>(\$000)</b>
53				
54	Opening tax losses		—	
55	plus Current period tax losses		—	
56	less Utilised tax losses		—	
57	Closing tax losses			—
58	<b>5a(vi): Calculation of Deferred Tax Balance</b>			<b>(\$000)</b>
59				
60	Opening deferred tax		(15,491)	
61				
62	plus Tax effect of adjusted depreciation		2,913	
63				
64	less Tax effect of tax depreciation		3,585	
65				
66	plus Tax effect of other temporary differences*		(45)	
67				
68	less Tax effect of amortisation of initial differences in asset values		952	
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		84	
73				
74	plus Deferred tax cost allocation adjustment		(11)	
75				
76	Closing deferred tax			(17,255)
77				
78	<b>5a(vii): Disclosure of Temporary Differences</b>			
79	In Schedule 14, Box 6, provide descriptions and workings of items recorded in the asterisked category in Schedule 5a(vi) (Tax effect of other temporary differences).			
80				
81	<b>5a(viii): Regulatory Tax Asset Base Roll-Forward</b>			<b>(\$000)</b>
82				
83	Opening sum of regulatory tax asset values		164,987	
84	less Tax depreciation		12,803	
85	plus Regulatory tax asset value of assets commissioned		9,209	
86	less Regulatory tax asset value of asset disposals		311	
87	plus Lost and found assets adjustment		—	
88	plus Adjustment resulting from asset allocation		(29)	
89	plus Other adjustments to the RAB tax value		—	
90	Closing sum of regulatory tax asset values			161,054

Company Name **Top Energy 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)
<b>Total regulatory income</b>		
<b>Market value of asset disposals</b>		
Service interruptions and emergencies	—	
Vegetation management	—	
Routine and corrective maintenance and inspection	—	
Asset replacement and renewal (opex)	—	
<b>Network opex</b>		—
Business support	858	
System operations and network support	350	
<b>Operational expenditure</b>		1,208
Consumer connection	—	
System growth	—	
Asset replacement and renewal (capex)	—	
Asset relocations	—	
Quality of supply	—	
Legislative and regulatory	—	
Other reliability, safety and environment	—	
<b>Expenditure on non-network assets</b>		—
<b>Expenditure on assets</b>		—
Cost of financing		
Value of capital contributions		
Value of vested assets		
<b>Capital Expenditure</b>		—
<b>Total expenditure</b>		1,208
<b>Other related party transactions</b>		

### 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)
Top Energy Ltd	Business support	858
Ngawha Generation Ltd (100% owned subsidiary)	System operations and network support	350
	[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]	
	[Select one]	
<b>Total value of related party transactions</b>		1,208

\* include additional rows if needed



Company Name **Top Energy 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 as weighted average original tenor of the debt is less than five years	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
* 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

311,079

Attribution Rate (%)

—

Term credit spread differential allowance

—

Company Name	Top Energy 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)
<b>Service interruptions and emergencies</b>					
Directly attributable		2,082			
Not directly attributable	-	-	-	-	-
<b>Total attributable to regulated service</b>		2,082			
<b>Vegetation management</b>					
Directly attributable		1,865			
Not directly attributable	-	-	-	-	-
<b>Total attributable to regulated service</b>		1,865			
<b>Routine and corrective maintenance and inspection</b>					
Directly attributable		2,261			
Not directly attributable	-	-	-	-	-
<b>Total attributable to regulated service</b>		2,261			
<b>Asset replacement and renewal</b>					
Directly attributable		966			
Not directly attributable	-	-	-	-	-
<b>Total attributable to regulated service</b>		966			
<b>System operations and network support</b>					
Directly attributable		6,189			
Not directly attributable	-	-	-	-	-
<b>Total attributable to regulated service</b>		6,189			
<b>Business support</b>					
Directly attributable		840			
Not directly attributable	-	5,362	1,260	6,622	-
<b>Total attributable to regulated service</b>		6,202			
<b>Operating costs directly attributable</b>		14,203			
<b>Operating costs not directly attributable</b>	-	5,362	1,260	6,622	-
<b>Operational expenditure</b>		19,565			

Company Name **Top Energy 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

### 39 5d(ii): Other Cost Allocations

#### 40 Pass through and recoverable costs

(\$000)

#### 41 Pass through costs

42 Directly attributable

283

43 Not directly attributable

-

44 Total attributable to regulated service

283

#### 45 Recoverable costs

46 Directly attributable

7,239

47 Not directly attributable

-

48 Total attributable to regulated service

7,239

### 50 5d(iii): Changes in Cost Allocations\* †

#### 52 Change in cost allocation 1

53 Cost category

54 Original allocator or line items

55 New allocator or line items

Original allocation

New allocation

Difference

CY-1

(\$000)

Current Year (CY)

-

-

56 Rationale for change

#### 61 Change in cost allocation 2

62 Cost category

63 Original allocator or line items

64 New allocator or line items

Original allocation

New allocation

Difference

CY-1

(\$000)

Current Year (CY)

-

-

66 Rationale for change

#### 70 Change in cost allocation 3

71 Cost category

72 Original allocator or line items

73 New allocator or line items

Original allocation

New allocation

Difference

CY-1

(\$000)

Current Year (CY)

-

-

75 Rationale for change

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

† include additional rows if needed

Company Name  
For Year Ended

Top Energy Limited  
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

### 7 5e(i): Regulated Service Asset Values

	Value allocated (\$000s) Electricity distribution services
<b>Subtransmission lines</b>	
Directly attributable	65,191
Not directly attributable	
<b>Total attributable to regulated service</b>	65,191
<b>Subtransmission cables</b>	
Directly attributable	9,805
Not directly attributable	
<b>Total attributable to regulated service</b>	9,805
<b>Zone substations</b>	
Directly attributable	43,651
Not directly attributable	
<b>Total attributable to regulated service</b>	43,651
<b>Distribution and LV lines</b>	
Directly attributable	82,729
Not directly attributable	
<b>Total attributable to regulated service</b>	82,729
<b>Distribution and LV cables</b>	
Directly attributable	40,918
Not directly attributable	
<b>Total attributable to regulated service</b>	40,918
<b>Distribution substations and transformers</b>	
Directly attributable	36,265
Not directly attributable	
<b>Total attributable to regulated service</b>	36,265
<b>Distribution switchgear</b>	
Directly attributable	33,100
Not directly attributable	
<b>Total attributable to regulated service</b>	33,100
<b>Other network assets</b>	
Directly attributable	5,324
Not directly attributable	
<b>Total attributable to regulated service</b>	5,324
<b>Non-network assets</b>	
Directly attributable	
Not directly attributable	3,038
<b>Total attributable to regulated service</b>	3,038
<b>Regulated service asset value directly attributable</b>	316,983
<b>Regulated service asset value not directly attributable</b>	3,038
<b>Total closing RAB value</b>	320,021

### 51 5e(ii): Changes in Asset Allocations\* †

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

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

† include additional rows if needed

Company Name

Top Energy 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	<b>6a(i): Expenditure on Assets</b>		(\$000)	(\$000)
8	Consumer connection			4,629
9	System growth			1,303
10	Asset replacement and renewal			4,909
11	Asset relocations			–
12	Reliability, safety and environment:			
13	Quality of supply	–		
14	Legislative and regulatory	–		
15	Other reliability, safety and environment	1,475		
16	<b>Total reliability, safety and environment</b>			1,475
17	<b>Expenditure on network assets</b>			12,316
18	Expenditure on non-network assets			1,497
19				
20	<b>Expenditure on assets</b>			13,813
21	plus Cost of financing			108
22	less Value of capital contributions			4,006
23	plus Value of vested assets			–
24				
25	<b>Capital expenditure</b>			9,914
26	<b>6a(ii): Subcomponents of Expenditure on Assets (where known)</b>			(\$000)
27	Energy efficiency and demand side management, reduction of energy losses			–
28	Overhead to underground conversion			–
29	Research and development			–
30	<b>6a(iii): Consumer Connection</b>			
31	Consumer types defined by EDB*		(\$000)	(\$000)
32	Commercial and Industrial		2,070	
33	Mass Market		2,559	
34		0		
35		0		
36		0		
37	* include additional rows if needed			
38	<b>Consumer connection expenditure</b>			4,629
39				
40	less Capital contributions funding consumer connection expenditure		4,006	
41	<b>Consumer connection less capital contributions</b>			623
42	<b>6a(iv): System Growth and Asset Replacement and Renewal</b>			
43				
44				
45	Subtransmission	119	1,260	
46	Zone substations	7	129	
47	Distribution and LV lines	404	3,125	
48	Distribution and LV cables	773	–	
49	Distribution substations and transformers	–	1	
50	Distribution switchgear	–	141	
51	Other network assets	–	254	
52	<b>System growth and asset replacement and renewal expenditure</b>	1,303	4,909	
53	less Capital contributions funding system growth and asset replacement and renewal	–	–	
54	<b>System growth and asset replacement and renewal less capital contributions</b>	1,303	4,909	
55				
56	<b>6a(v): Asset Relocations</b>			
57	Project or programme*		(\$000)	(\$000)
58	Nil	–		
59		0		
60		0		
61		0		
62		0		
63	* include additional rows if needed			
64	All other projects or programmes - asset relocations	–		
65	<b>Asset relocations expenditure</b>			–
66	less Capital contributions funding asset relocations	–		
67	<b>Asset relocations less capital contributions</b>			–

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.


Company Name

Top Energy 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

121		0	—	
122		0	—	
123		0	—	
124	<i>* include additional rows if needed</i>			
125	All other projects or programmes - atypical expenditure			—
126	<b>Atypical expenditure</b>			—
127				
128	<b>Expenditure on non-network assets</b>			1,497

Company Name

Top Energy Limited

For Year Ended

31 March 2022

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

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

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

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

sch ref

7	<b>6b(i): Operational Expenditure</b>		
8	Service interruptions and emergencies	(\$000)	(\$000)
9	Vegetation management	2,082	
10	Routine and corrective maintenance and inspection	1,865	
11	Asset replacement and renewal	2,261	
12	<b>Network opex</b>	966	
13	System operations and network support		7,174
14	Business support	6,189	
15	<b>Non-network opex</b>	6,202	
16			12,392
17	<b>Operational expenditure</b>		19,565
18	<b>6b(ii): Subcomponents of Operational Expenditure (where known)</b>		
19	Energy efficiency and demand side management, reduction of energy losses		—
20	Direct billing*		—
21	Research and development		—
22	Insurance		558
23	* Direct billing expenditure by suppliers that directly bill the majority of their consumers		



Company Name **Top Energy 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	<b>7(i): Revenue</b>	<b>Target (\$000) <sup>1</sup></b>	<b>Actual (\$000)</b>	<b>% variance</b>
8	Line charge revenue	46,352	47,296	2%
9	<b>7(ii): Expenditure on Assets</b>	<b>Forecast (\$000) <sup>2</sup></b>	<b>Actual (\$000)</b>	<b>% variance</b>
10	Consumer connection	4,113	4,629	13%
11	System growth	1,263	1,303	3%
12	Asset replacement and renewal	6,888	4,909	(29%)
13	Asset relocations	—	—	—
14	Reliability, safety and environment:			
15	Quality of supply	1,098	—	(100%)
16	Legislative and regulatory	—	—	—
17	Other reliability, safety and environment	1,018	1,475	45%
18	<b>Total reliability, safety and environment</b>	<b>2,116</b>	<b>1,475</b>	<b>(30%)</b>
19	<b>Expenditure on network assets</b>	<b>14,380</b>	<b>12,316</b>	<b>(14%)</b>
20	Expenditure on non-network assets	1,559	1,497	(4%)
21	Expenditure on assets	15,939	13,813	(13%)
22	<b>7(iii): Operational Expenditure</b>			
23	Service interruptions and emergencies	1,313	2,082	59%
24	Vegetation management	1,850	1,865	1%
25	Routine and corrective maintenance and inspection	2,120	2,261	7%
26	Asset replacement and renewal	1,019	966	(5%)
27	<b>Network opex</b>	<b>6,302</b>	<b>7,174</b>	<b>14%</b>
28	System operations and network support	6,374	6,189	(3%)
29	Business support	6,412	6,202	(3%)
30	<b>Non-network opex</b>	<b>12,786</b>	<b>12,392</b>	<b>(3%)</b>
31	<b>Operational expenditure</b>	<b>19,088</b>	<b>19,565</b>	<b>3%</b>
32	<b>7(iv): Subcomponents of Expenditure on Assets (where known)</b>			
33	Energy efficiency and demand side management, reduction of energy losses	—	—	—
34	Overhead to underground conversion	—	—	—
35	Research and development	—	—	—
36				
37	<b>7(v): Subcomponents of Operational Expenditure (where known)</b>			
38	Energy efficiency and demand side management, reduction of energy losses	—	—	—
39	Direct billing	—	—	—
40	Research and development	—	—	—
41	Insurance	340	558	64%
42				
43	<i>1 From the nominal dollar target revenue for the disclosure year disclosed under clause 2.4.3(3) of this determination</i>			
44	<i>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)</i>			

Company Name	Top Energy Limited
For Year Ended	31 March 2022
Network / Sub-Network Name	

**SCHEDULE 8: REPORT ON BILLED QUANTITIES AND LINE CHARGE REVENUES**

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

sch ref

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

Consumer group name or price category code	Consumer type or types (eg, residential, commercial etc.)	Standard or non-standard consumer group (specify)	Average no. of ICPs in disclosure year	Energy delivered to ICPs in disclosure year (MWh)
IND	Commercial	Non-standard	3	46,346
TOU	Commercial	Standard	63	13,812
TOUTX	Commercial	Standard	24	25,621
GA	Commercial	Standard	45	6,272
GC	Commercial	Standard	378	5,201
GG	Commercial	Standard	3,725	58,022
GU	Commercial	Standard	1,340	15,532
LC	Residential	Standard	6,835	34,478
LR	Residential	Standard	7,947	37,145
LU	Residential	Standard	1,609	5,839
SC	Residential	Standard	3,498	26,740
SR	Residential	Standard	5,733	41,017
SU	Residential	Standard	1,862	12,851
STL (UM)	Unmetered	Non-standard	198	661
LDG	Commercial	Non-standard	4	292
DG	Commercial	Non-standard	–	–
Add extra rows for additional consumer groups or price category codes as necessary				
Standard consumer totals			33,057	282,531
Non-standard consumer totals			205	47,299
Total for all consumers			33,263	329,830

Unit charging basis (eg, days, kW of demand, kVA of capacity, etc.)

Price component

**Billed quantities by price component**

Variable	Fixed	Variable			
No charge kWh	Days	kWh			
–	46,346	–			
–	–	13,812			
–	–	25,621			
–	–	6,272			
–	–	5,201			
–	–	58,022			
–	–	15,532			
–	–	34,478			
–	–	37,145			
–	–	5,839			
–	–	26,740			
–	–	41,017			
–	–	12,851			
–	661	–			
292	–	–			
–	–	–			
–	–	282,531	–	–	–
292	47,007	–	–	–	–
292	47,007	282,531	–	–	–

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

Company Name	Top Energy Limited
For Year Ended	31 March 2022
Network / Sub-Network Name	

**SCHEDULE 8: REPORT ON BILLED QUANTITIES AND LINE CHARGE REVENUES**

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

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

Consumer group name or price category code	Consumer type or types (eg, residential, commercial etc.)	Standard or non-standard consumer group (specify)	Total line charge revenue in disclosure year	Notional revenue foregone from posted discounts (if applicable)	Total distribution line charge revenue	Total transmission line charge revenue (if available)	Rate (eg, \$ per day, \$ per kWh, etc.)	Line charge revenues (\$000) by price component					
								Price component	Gross Income	Gross Income	Discount	Discount	
									\$/Days	\$/kWh	\$/Days	\$/kWh	
IND	Commercial	Non-standard	\$1,586	—	\$747	\$840			\$1,612	—	—	—	(\$26)
TOU	Commercial	Standard	\$1,392	—	\$1,040	\$352			\$415	\$1,023	(\$8)	—	(\$38)
TOUTX	Commercial	Standard	\$2,045	—	\$1,465	\$581			\$340	\$1,767	(\$5)	—	(\$57)
GA	Commercial	Standard	\$832	—	\$675	\$156			\$149	\$710	(\$9)	—	(\$18)
GC	Commercial	Standard	\$750	—	\$649	\$101			\$205	\$618	(\$18)	—	(\$56)
GG	Commercial	Standard	\$10,272	—	\$8,570	\$1,702			\$2,035	\$8,898	(\$174)	—	(\$487)
GU	Commercial	Standard	\$2,989	—	\$2,662	\$327			\$742	\$2,547	(\$76)	—	(\$223)
LC	Residential	Standard	\$4,926	—	\$4,242	\$684			\$377	\$6,109	(\$363)	—	(\$1,195)
LR	Residential	Standard	\$5,854	—	\$4,843	\$1,012			\$433	\$7,058	(\$385)	—	(\$1,252)
LU	Residential	Standard	\$1,104	—	\$916	\$187			\$89	\$1,376	(\$86)	—	(\$275)
SC	Residential	Standard	\$4,212	—	\$3,703	\$509			\$1,744	\$3,274	(\$190)	—	(\$616)
SR	Residential	Standard	\$7,302	—	\$6,234	\$1,068			\$2,801	\$5,607	(\$266)	—	(\$840)
SU	Residential	Standard	\$2,788	—	\$2,513	\$275			\$920	\$2,262	(\$96)	—	(\$297)
STL (UM)	Unmetered	Non-standard	\$394	—	\$394	—			\$394	—	—	—	—
LDG	Commercial	Non-standard	\$832	—	\$832	—			\$777	\$55	—	—	—
DG	Commercial	Non-standard	—	—	—	—			—	—	—	—	—
Solar	Commercial	Non-standard	\$17	—	\$17	—			—	\$17	—	—	—
Standard consumer totals					\$44,466	—		—	\$10,250	\$41,248	—	—	(\$5,354)
Non-standard consumer totals					\$2,830	—		—	\$2,783	\$72	—	—	(\$526)
Total for all consumers					\$47,296	—		—	\$13,033	\$41,321	—	—	(\$5,380)

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

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

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

Number of directly billed ICPs at year end

—

Check OK

Company Name **Top Energy 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	Items at end of	Net change	Data accuracy
	Voltage	Asset category	Asset class	Units	year (quantity)	year (quantity)		(1-4)
8	All	Overhead Line	Concrete poles / steel structure	No.	35,363	35,403	40	3
9	All	Overhead Line	Wood poles	No.	1,186	1,172	(14)	3
10	All	Overhead Line	Other pole types	No.	10	11	1	3
11	HV	Subtransmission Line	Subtransmission OH up to 66kV conductor	km	314	315	1	3
12	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	66	66	0	3
13	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	22	23	1	3
14	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Oil pressurised)	km	—	—	—	4
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	—	—	—	4
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	—	—	—	4
17	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	—	—	—	4
18	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Oil pressurised)	km	—	—	—	4
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	—	—	—	4
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	—	—	—	4
21	HV	Subtransmission Cable	Subtransmission submarine cable	km	—	—	—	4
22	HV	Zone substation Buildings	Zone substations up to 66kV	No.	14	14	—	4
23	HV	Zone substation Buildings	Zone substations 110kV+	No.	2	2	—	4
24	HV	Zone substation switchgear	50/66/110kV CB (Indoor)	No.	—	—	—	4
25	HV	Zone substation switchgear	50/66/110kV CB (Outdoor)	No.	7	7	—	3
26	HV	Zone substation switchgear	33kV Switch (Ground Mounted)	No.	48	48	—	3
27	HV	Zone substation switchgear	33kV Switch (Pole Mounted)	No.	188	188	—	3
28	HV	Zone substation switchgear	33kV RMU	No.	—	—	—	4
29	HV	Zone substation switchgear	22/33kV CB (Indoor)	No.	48	48	—	4
30	HV	Zone substation switchgear	22/33kV CB (Outdoor)	No.	45	45	—	4
31	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (ground mounted)	No.	114	114	—	4
32	HV	Zone substation switchgear	3.3/6.6/11/22kV CB (pole mounted)	No.	—	—	—	4
33	HV	Zone Substation Transformer	Zone Substation Transformers	No.	33	38	5	4
34	HV	Distribution Line	Distribution OH Open Wire Conductor	km	2,132	2,131	(1)	3
35	HV	Distribution Line	Distribution OH Aerial Cable Conductor	km	—	—	—	4
36	HV	Distribution Line	SWER conductor	km	452	452	0	3
37	HV	Distribution Cable	Distribution UG XLPE or PVC	km	189	193	4	3
38	HV	Distribution Cable	Distribution UG PILC	km	32	32	—	3
39	HV	Distribution Cable	Distribution Submarine Cable	km	4	4	0	3
40	HV	Distribution switchgear	3.3/6.6/11/22kV CB (pole mounted) - reclosers and sectionalisers	No.	353	353	—	4
41	HV	Distribution switchgear	3.3/6.6/11/22kV CB (Indoor)	No.	—	—	—	4
42	HV	Distribution switchgear	3.3/6.6/11/22kV Switches and fuses (pole mounted)	No.	1,423	1,443	20	4
43	HV	Distribution switchgear	3.3/6.6/11/22kV Switch (ground mounted) - except RMU	No.	12	15	3	4
44	HV	Distribution switchgear	3.3/6.6/11/22kV RMU	No.	205	207	2	4
45	HV	Distribution Transformer	Pole Mounted Transformer	No.	5,127	5,137	10	3
46	HV	Distribution Transformer	Ground Mounted Transformer	No.	885	894	9	3
47	HV	Distribution Transformer	Voltage regulators	No.	11	12	1	4
48	HV	Distribution Substations	Ground Mounted Substation Housing	No.	23	23	—	3
49	LV	LV Line	LV OH Conductor	km	218	218	(0)	3
50	LV	LV Cable	LV UG Cable	km	674	680	6	3
51	LV	LV Street lighting	LV OH/UG Streetlight circuit	km	318	318	0	3
52	LV	Connections	OH/UG consumer service connections	No.	34,214	34,705	491	2
53	All	Protection	Protection relays (electromechanical, solid state and numeric)	No.	472	472	—	4
54	All	SCADA and communications	SCADA and communications equipment operating as a single system	Lot	1	1	—	4
55	All	Capacitor Banks	Capacitors including controls	No.	19	19	—	4
56	All	Load Control	Centralised plant	Lot	2	2	—	4
57	All	Load Control	Relays	No.	—	—	—	4
58	All	Civils	Cable Tunnels	km	—	—	—	4

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.

Disclosure Year (year ended)		31 March 2022	Number of assets at disclosure year end by installation date																																				No. with age	Items at default	No. with Data accuracy
			Units	pre-1940	1940 -1949	1950 -1959	1960 -1969	1970 -1979	1980 -1989	1990 -1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	unknown	year	default dates	(1-4)	
9	Voltage	Asset category	Asset class																																						
10	All	Overhead Line	Concrete poles / steel structure	No.	1	308	348	6,050	7,362	6,078	5,423	666	807	360	339	521	309	476	677	371	509	571	352	247	404	272	260	420	300	345	288	154	8	-	-	-	-	35,403	3		
11	All	Overhead Line	Wood poles	No.	-	18	87	180	325	156	164	26	15	8	6	8	11	10	28	18	8	80	-	4	3	2	3	2	4	4	-	1	-	1	-	-	-	1,172	3		
12	All	Overhead Line	Other pole types	No.	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11	2		
13	HV	Subtransmission Line	UG up to 66kV conductor	km	-	-	5	10	107	76	35	-	-	0	-	-	-	-	-	-	3	2	32	21	2	4	12	0	1	2	0	2	0	-	-	-	-	315	5		
14	HV	Subtransmission Line	Subtransmission OH 110kV+ conductor	km	-	-	-	5	-	56	-	-	-	-	0	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	5	5	-	-	-	-	-	66	3		
15	HV	Subtransmission Cable	Subtransmission UG up to 66kV (XLPE)	km	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	0	-	-	-	8	11	0	0	-	1	0	1	1	-	-	-	23	3		
16	HV	Subtransmission Cable	Subtransmission UG up to 66kV (OH pressurised)	km	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
17	HV	Subtransmission Cable	Subtransmission UG up to 66kV (Gas pressurised)	km	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
18	HV	Subtransmission Cable	Subtransmission UG up to 66kV (PILC)	km	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
19	HV	Subtransmission Cable	Subtransmission UG 110kV+ (XLPE)	km	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
20	HV	Subtransmission Cable	Subtransmission UG 110kV+ (OH pressurised)	km	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
21	HV	Subtransmission Cable	Subtransmission UG 110kV+ (Gas Pressurised)	km	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
22	HV	Subtransmission Cable	Subtransmission UG 110kV+ (PILC)	km	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
23	HV	Subtransmission Cable	Subtransmission submarine cable	km	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
24	HV	Zone substation Buildings	Zone substations up to 66kV	No.	-	-	-	2																																	

Company Name **Top Energy 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	<b>Circuit length by operating voltage (at year end)</b>	<b>Overhead (km)</b>	<b>Underground (km)</b>
11	> 66kV	66	66
12	50kV & 66kV	—	—
13	33kV	315	23
14	SWER (all SWER voltages)	451	2
15	22kV (other than SWER)	16	1
16	6.6kV to 11kV (inclusive—other than SWER)	2,106	225
17	Low voltage (< 1kV)	218	680
18	<b>Total circuit length (for supply)</b>	<b>3,171</b>	<b>931</b>
19			
20	Dedicated street lighting circuit length (km)	9	309
21	Circuit in sensitive areas (conservation areas, iwi territory etc) (km)		1,324
22			
23	<b>Overhead circuit length by terrain (at year end)</b>	<b>Circuit length (km)</b>	<b>(% of total overhead length)</b>
24	Urban	170	5%
25	Rural	2,075	65%
26	Remote only	5	0%
27	Rugged only	655	21%
28	Remote and rugged	—	—
29	Unallocated overhead lines	266	8%
30	<b>Total overhead length</b>	<b>3,171</b>	<b>100%</b>
31			
32		<b>Circuit length (km)</b>	<b>(% of total circuit length)</b>
33	Length of circuit within 10km of coastline or geothermal areas (where known)	3,797	93%
34		<b>Circuit length (km)</b>	<b>(% of total overhead length)</b>
35	Overhead circuit requiring vegetation management	428	13%

Company Name **Top Energy 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	0000005544TE522 (KKRV)	1	63
10	0000010777TEBDC (C/57 Hall Road, Kerikeri)	1	5
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 **Top Energy 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\*

GC
GG
GU
LC
LR
LU
SC
SR
SU
UML

\* include additional rows if needed

Connections total

Number of  
connections (ICPs)

5
300
37
18
15
7
58
29
5
16

490

**Distributed generation**

Number of connections made in year

Capacity of distributed generation installed in year

284 connections

2.19 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 points

Demand at time  
of maximum  
coincident  
demand (MW)

21
57
77
—
77

**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)

Energy (GWh)

20
101
449
—
368
330
38

10.4%

Load factor

0.54

**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)

283
42
325
478



Company Name **Top Energy 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**

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)

**Total****Number of interruptions**

–
315
473
–
–
–
–
–
–
788

**Interruption restoration**

Class C interruptions restored within

**≤3Hrs****>3hrs**

251	222
-----	-----

**SAIFI and SAIDI by class**

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)

**Total****SAIFI****SAIDI**

–	–
1.0	166.4
4.5	741.5
–	–
–	–
–	–
–	–
–	–
–	–
5.44	907.9

**Normalised SAIFI and SAIDI**

Classes B &amp; C (interruptions on the network)

**Normalised SAIFI****Normalised SAIDI**

4.9	456.3
-----	-------

Company Name **Top Energy 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

Lightning  
 Vegetation  
 Adverse weather  
 Adverse environment  
 Third party interference  
 Wildlife  
 Human error  
 Defective equipment  
 Cause unknown

SAIFI	SAIDI
0.1	5.6
0.9	97.5
0.7	413.6
—	—
0.5	58.1
0.1	4.3
0.2	0.8
1.0	97.7
1.0	64.0

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

#### Main equipment involved

Subtransmission lines  
 Subtransmission cables  
 Subtransmission other  
 Distribution lines (excluding LV)  
 Distribution cables (excluding LV)  
 Distribution other (excluding LV)

SAIFI	SAIDI
0.0	0.4
—	—
—	—
1.0	166.0
—	—
—	—

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

#### Main equipment involved

Subtransmission lines  
 Subtransmission cables  
 Subtransmission other  
 Distribution lines (excluding LV)  
 Distribution cables (excluding LV)  
 Distribution other (excluding LV)

SAIFI	SAIDI
0.7	90.8
—	—
—	—
3.8	650.7
—	—
—	—

### 10(v): Fault Rate

#### Main equipment involved

Subtransmission lines  
 Subtransmission cables  
 Subtransmission other  
 Distribution lines (excluding LV)  
 Distribution cables (excluding LV)  
 Distribution other (excluding LV)

Number of Faults	Circuit length (km)
13	381
—	23
—	—
460	2,583
—	229
—	—
473	—

#### Fault rate (faults per 100km)

3.41
—
17.81
—

Total

Company Name

Top Energy Limited

For Year Ended

31 March 2022

**SCHEDULE 5f: REPORT SUPPORTING COST ALLOCATIONS**

This schedule requires additional detail on the asset allocation methodology applied in allocating asset values that are not directly attributable, to support the information provided in Schedule 5d (Cost allocations). This schedule is not required to be publicly disclosed, but must be disclosed to the Commission.

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

sch ref

8												
9					Allocator Metric (%)		Value allocated (\$000)				OVABAA allocation increase (\$000)	
10	Line Item*	Allocation methodology type	Cost allocator	Allocator type	Electricity distribution services	Non-electricity distribution services	Arm's length deduction	Electricity distribution services	Non-electricity distribution services	Total		
11	Service interruptions and emergencies											
12	Nil									-		
13										-		
14										-		
15										-		
16	Not directly attributable							-	-	-	-	-
17	Vegetation management											
18	Nil									-		
19										-		
20										-		
21										-		
22	Not directly attributable							-	-	-	-	-
23	Routine and corrective maintenance and inspection											
24	Nil									-		
25										-		
26										-		
27										-		
28	Not directly attributable							-	-	-	-	-
29	Asset replacement and renewal											
30	Nil									-		
31										-		
32										-		
33										-		
34	Not directly attributable							-	-	-	-	-
35												

Company Name

Top Energy Limited

For Year Ended

31 March 2022

**SCHEDULE 5f: REPORT SUPPORTING COST ALLOCATIONS**

This schedule requires additional detail on the asset allocation methodology applied in allocating asset values that are not directly attributable, to support the information provided in Schedule 5d (Cost allocations). This schedule is not required to be publicly disclosed, but must be disclosed to the Commission.

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

sch ref

36	<b>System operations and network support</b>										
37	Nil									-	
38										-	
39										-	
40										-	
41	Not directly attributable							-	-	-	-
42	<b>Business support</b>										
43	Corporate property expenses	ABAA	Corporate resource	Causal	85.33%	14.67%		188	32	221	
	Corporate computer, telephone & PR	ABAA	Corporate resource	Causal	85.33%	14.67%		686	118	804	
	Executive, directors and support	ABAA	Director time spent	Causal	75.00%	25.00%		1,470	490	1,960	
	Audit, insurance, admin and consultancy	ABAA	Corporate resource	Causal	85.33%	14.67%		370	64	434	
	Corporate training, recruitment and welfare	ABAA	Corporate resource	Causal	85.33%	14.67%		473	81	555	
44	Salaries executive and support	ABAA	Corporate resource	Proxy	85.33%	14.67%		(0)	-	(0)	
45	Corporate salaries for property, procurement & finance	ABAA	Time spent	Causal	86.11%	13.89%		1,713	276	1,989	
46	Salaries HR corporate	ABAA	Time spent	Causal	70.00%	30.00%		462	198	661	
47	Not directly attributable							-	5,362	1,260	6,622
48											
49	Operating costs not directly attributable							-	5,362	1,260	6,622
50											
51	<b>Pass through and recoverable costs</b>										
52	<b>Pass through costs</b>										
53	Nil									-	
54										-	
55										-	
56										-	
57	Not directly attributable							-	-	-	-
58	<b>Recoverable costs</b>										
59	Nil									-	
60										-	
61										-	
62										-	
63	Not directly attributable							-	-	-	-
64	* include additional rows if needed										

Company Name

Top Energy Limited

For Year Ended

31 March 2022

**SCHEDULE 5g: REPORT SUPPORTING ASSET ALLOCATIONS**

This schedule requires additional detail on the asset allocation methodology applied in allocating asset values that are not directly attributable, to support the information provided in Schedule 5e (Report on Asset Allocations). This schedule is not required to be publicly disclosed, but must be disclosed to the Commission.

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

sch ref

				Allocator Metric (%)		Value allocated (\$000)				OVABAA allocation increase (\$000)	
	Line Item*	Allocation methodology type	Allocator	Allocator type	Electricity distribution services	Non-electricity distribution services	Arm's length deduction	Electricity distribution services	Non-electricity distribution services		Total
	Subtransmission lines										
	Nil									-	
										-	
										-	
										-	
	Not directly attributable						-	-	-	-	-
	Subtransmission cables										
	Nil									-	
										-	
										-	
										-	
	Not directly attributable						-	-	-	-	-
	Zone substations										
	Nil									-	
										-	
										-	
										-	
	Not directly attributable						-	-	-	-	-
	Distribution and LV lines										
	Nil									-	
										-	
										-	
										-	
	Not directly attributable						-	-	-	-	-

Company Name **Top Energy Limited**  
 For Year Ended **31 March 2022**

### SCHEDULE 5g: REPORT SUPPORTING ASSET ALLOCATIONS

This schedule requires additional detail on the asset allocation methodology applied in allocating asset values that are not directly attributable, to support the information provided in Schedule 5e (Report on Asset Allocations). This schedule is not required to be publicly disclosed, but must be disclosed to the Commission.

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

sch ref

35	<b>Distribution and LV cables</b>										
36	Nil									-	
37										-	
38										-	
39										-	
40	Not directly attributable						-	-	-	-	-
41											
42	<b>Distribution substations and transformers</b>										
43	Nil									-	
44										-	
45										-	
46										-	
47	Not directly attributable						-	-	-	-	-
48											
49	<b>Distribution switchgear</b>										
50	Nil									-	
51										-	
52										-	
53										-	
54	Not directly attributable						-	-	-	-	-
55	<b>Other network assets</b>										
56	Nil									-	
57										-	
58										-	
59										-	
60	Not directly attributable						-	-	-	-	-
61	<b>Non-network assets</b>										
62	Categories based on ABBA	ABBA	Allocator 1	Proxy				3,038		3,038	
63										-	
64										-	
65										-	
66	Not directly attributable						-	3,038	-	3,038	-
67											
68	Regulated service asset value not directly attributable						-	3,038	-	3,038	-
69	* include additional rows if needed										

Company Name	Top Energy
For Year Ended	31 <sup>st</sup> March 2022

## Schedule 14      Mandatory Explanatory Notes

*(Guidance Note: This Microsoft Word version of Schedules 14, 14a and 15 is 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**

There have been no reclassifications in 2022. Top Energy has elected to disclose the information in the monthly ROI table even though it is not mandatory in accordance with subclause 2.3.3(1).

### *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**

Other income of \$1,209k which consists of reimbursement of fault expenses received from external parties \$346k, Transpower loss and constraints payments \$527k, and generation income for Diesel Generation of \$335k.

*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 based (rolled forward)**

There has been no change to the RAB roll forward calculations.

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

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

**Box 5: Regulatory tax allowance: permanent differences**

The total comprises disallowed entertainment expenses (\$5k) This item falls within category 8.2 above.



*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)**

The total of \$45k comprises timing differences arising from the movement in payroll accruals between the beginning and end of the year to 31 March 2022 (\$162k), multiplied by the tax rate of 28%.

*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**

There have been no reclassifications in 2022.

*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**

There have been no reclassifications in 2022.

*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**

For non-network assets, assets are grouped into the respective asset category.

The materiality threshold has not been changed and is \$50k

No information has been reclassified.

*Operational Expenditure for the Disclosure Year (Schedule 6b)*

13. In the box below, comment on operational expenditure for the disclosure year, as disclosed in Schedule 6b. This comment must include-
- 13.1 Commentary on assets replaced or renewed with asset replacement and renewal operational expenditure, as reported in 6b(i) of Schedule 6b;
  - 13.2 Information on reclassified items in accordance with subclause 2.7.1(2);
  - 13.3 Commentary on any material atypical expenditure included in operational expenditure disclosed in Schedule 6b, a including the value of the expenditure the purpose of the expenditure, and the operational expenditure categories the expenditure relates to.

**Box 10: Explanation of operational expenditure for the disclosure year**

No items were re-classified in the Disclosure Year.

No atypical operational expenditure was incurred.

There are other related party transactions that do not fall within the scope of S5b as they are not defined as OPEX or CAPEX. This includes avoided cost of transmission charges and a recovery of connection charges from Transpower.

*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 Network Assets is 14% under and is attributed to;

- Stretched pool of resources (approx. 10% under full complement)
- Stop/start nature of projects as a result of Covid lockdowns during FY-22
- High uptake in customer initiated works
- High faults on the network
- Unforeseen supply chain delays causing disruption to our planned works program.
- Stand down of contracting staff as a result of Covid positive cases.

Network Opex was higher than forecast by 14% because of high demand from faults (\$701k/51%) and safety services (\$113k/114%). All other workflows were within  $\pm 10\%$  of budget.

Expenditure on Non-Network Assets was slightly lower by 4%.

Non Network opex was lower by 3%.

*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**

Price structure categories are Industrial, Commercial and Residential, which has been grouped as low user or standard. Changes made to the price category structure from 1 April 2016 have been used in schedule 8.

The actual revenue (including the discount) was \$54,354k, 2% higher than the forecast revenue of \$53,280K. This was due primarily due to higher consumption. The net actual line revenue was \$47,296k. A posted discount was paid in May 2022. The discount was for a maximin of \$217.39 GST exclusive for qualifying residential and general commercial connections .

*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**

There has been no changes to the methodology used to acquire and record customer outages for the 2022 Information Disclosure.

*Insurance cover*

17. In the box below, provide details of any insurance cover for the assets used to provide electricity distribution services, including-
- 17.1 The EDB's approaches and practices in regard to the insurance of assets used to provide electricity distribution services, including the level of insurance;
- 17.2 In respect of any self insurance, the level of reserves, details of how reserves are managed and invested, and details of any reinsurance.

**Box 14: Explanation of insurance cover**

Insurance is obtained for assets of a material nature that are contained in one location. For example, substation assets are insured; however individual poles and conductor/cable across the network are not. Inventory and critical spares are also insured due to common storage locations. Insurance levels are approx. \$143million.

A major event that would affect assets that are self-insured (poles and conductor/cables) may require additional debt facilities to be obtained. There is no reinsurance.

*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 were no amendments to previously disclosed information

Company Name	Top Energy Ltd
For Year Ended	31 <sup>st</sup> 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**

Our constant price forecast is based on FYE 2023 prices. We have assumed an inflation rate of 15% for material and 6% for labour in FYE 2023. In subsequent years we have assumed an inflation rate of 2%, which is the midpoint of the Reserve Bank's target inflation range. Industry specific analysis of potential price movements is not considered justified given the forecast uncertainty.

*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**

Our constant price forecast is based on FYE 2023 prices. We have assumed an inflation rate of 15% for material and 6% for labour in FYE 2023. In subsequent years we have assumed an inflation rate of 2%, which is the midpoint of the Reserve Bank's target inflation range. Industry specific analysis of potential price movements is not considered justified given the forecast uncertainty.

Company Name Top Energy Ltd

For Year Ended 31<sup>st</sup> March 2022

## **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**

No substantial changes have been made to information previously disclosed

## Directors Certificate

### Certification for Year-end Disclosures

#### Clause 2.9.2

#### Electricity Distribution Information Disclosure Determination 2012

We, David Alexander Sullivan and Jon Edmond Nichols, being directors of Top Energy 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 Top Energy's accounting and other records sourced from its financial and non-financial systems, and that sufficient 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 good or services sold or supplied to a related party comply, in all material respects with clause 2.3.6(2) of the Electricity Distribution Information Disclosure Determination 2012.



D A Sullivan



J E Nichols

30 August 2022

## INDEPENDENT ASSURANCE REPORT

### TO THE DIRECTORS OF TOP ENERGY 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)

Top Energy 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, Brett Tomkins, using the staff and resources of Deloitte Limited, to undertake a reasonable assurance engagement, on his behalf, on whether the information subject to audit in terms of the Determination, 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 5q, 6a and 6b, 7, 10 and 14 (limited to the explanatory notes in boxes 1 to 11) of the Determination.
- Clause 2.3.6 of the Determination and clauses 2.2.11(1)(g) and 2.2.11(5) of the Electricity Distribution Services Input Methodologies Determination 2012 ('the IM Determination'), in respect of the basis for valuation of related party transactions ('the Related Party Transaction Information').

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

### Opinion

In our opinion, in all material respects:

- as far as appears from an examination, proper records to enable the complete and accurate compilation of the Disclosure Information have been kept by the Company;
- as far as appears from an examination, the information used in the preparation of the Disclosure Information has been properly extracted from the Company's accounting and other records, sourced from the Company's financial and non-financial systems;
- the Disclosure Information complies, with the Determination; and
- the basis for valuation of related party transactions complies with the Determination and the IM Determination.

### Basis for opinion

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

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

### Key Assurance Matters

Key assurance matters are those matters that, in our professional judgement, required significant attention when carrying out the assurance engagement during the current disclosure year. These matters were addressed in the context of our compliance engagement, and in forming our opinion. We do not provide a separate opinion on these matters.



Key Assurance Matter	How our procedures addressed the key assurance matter
<p><b>Cost Allocations</b></p> <p>The Determination, as amended, and the Input Methodologies Determination require the disclosure of information concerning the supply of electricity distribution services (regulated services). The Company also supplies customers with unregulated services such as contracting services.</p> <p>Costs that relate to electricity distribution services regulated under the Determination, as amended, and the Input Methodologies Determination should comprise:</p> <ul style="list-style-type: none"> <li>• all of the costs directly attributable to the supply of electricity distribution services; and</li> <li>• an allocated portion of the costs that are not directly attributable.</li> </ul> <p>The Input Methodologies Determination sets out the rules and processes for allocating not directly attributable costs. Several screening tests apply which should be considered when deciding on the appropriate allocation method.</p> <p>Given the judgement involved in the application of the method for allocating not directly attributable costs to the Company's regulated services, we consider this to be a key audit matter.</p>	<p>We have:</p> <ul style="list-style-type: none"> <li>• obtained an understanding of the Company's cost allocation processes and the method applied;</li> <li>• reconciled the regulated and unregulated financial information (which is included in separate business unit trial balances) to the audited financial statements for the year ended 31 March 2022;</li> <li>• reviewed the cost allocation by business unit, based on their nature and on our understanding of the business, to determine the reasonableness of the directly attributable costs by business unit;</li> <li>• assessed the reasonableness of the cost allocator and the resulting percentage allocation to regulated business; and</li> <li>• examined the method applied by the company for allocating not directly attributable costs and assessing if the method complies with the Determination, as amended, and the Input Methodologies Determination.</li> </ul>

## Accuracy of the number and duration of electricity outages

The Information Disclosure Determination defines certain quality measures in relation to the number of interruptions, faults, and causes of faults. These quality measures are expressed in the form of SAIDI and SAIFI values.

The Company does not have automated systems for identifying all outages and for recording the duration of outages in some locations.

When outages occur in these locations the Company is often dependent on customers advising it of the outage. The information is then recorded in an outage listing, which is updated to reflect any manual adjustments.

Manual switching sheets are maintained for all faults and contain details regarding the class and calculation of each outage.

This is a key audit matter because information on the frequency and duration of outages is an important measure about the reliability of electricity supply. Inaccuracies or the omission of faults can potentially have a significant impact on the reliability thresholds against which Company performance is assessed.

We have:

- obtained an understanding of the Company's methods by which electricity outages and their duration are recorded;
- completed analytical procedures for outage events, including analysing actual outages compared with prior year outages;
- tested the design and implementation of key controls related to the recording and review of outage data;
- tested a sample of outage events to ensure the metrics surrounding the events such as start time, number of customers affected, and end time were consistent with the fault log sheet and responding technician's records;
- tested a sample of outage events captured by the system management software used to monitor the network and which electronically records certain outage events;
- assessed the reasonableness of why certain events have not been recorded as an outage events;
- tested a sample of outage notifications recorded by an independent call centre to ensure the outage event has been accurately recorded;
- checked whether major storm and outage events recorded in the media were appropriately recorded in the faults database;
- tested a sample of outage events to ensure the classification of the type of event is reasonable;
- reviewed the disclosure in Schedule 14 in respect of the treatment of successive interruptions; and
- recalculated the normalised SAIDI and SAIFI using the predetermined boundary limits.

## Directors' responsibilities

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

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

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

## Auditor's responsibilities

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

- As far as appears from an examination, the information used in the preparation of the audited Disclosure Information has been properly extracted from the Company's accounting and other records, sourced from its financial and non-financial systems;
- As far as appears from an examination, proper records to enable the complete and accurate compilation of the audited Disclosure Information required by the Determination have been kept by the Company and, if not, the records not so kept;

- The Company complied, in all material respects, with the Determination in preparing the audited Disclosure Information; and
- The Company's basis for valuation of related party transactions in the disclosure year has complied, in all material respects, with clause 2.3.6 of the Determination and clauses 2.2.11(1)(g) and 2.2.11(5) of the IM Determination.

To meet these responsibilities, we planned and performed procedures in accordance with SAE (NZ) 3100 (Revised), to obtain reasonable assurance about whether the Company has complied, in all material respects, with the Disclosure Information (which includes the Related Party Transaction Information) required to be audited by the Determination.

An assurance engagement to report on the Company's compliance with the Determination involves performing procedures to obtain evidence about the compliance activity and controls implemented to meet the requirements. The procedures selected depend on our judgement, including the identification and assessment of the risks of material non-compliance with the requirements.

### **Inherent limitations**

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

### **Restricted use**

This report has been prepared for use by the directors of the Company and the Commerce Commission in accordance with clause 2.8.1(1)(a) of the Determination and is provided solely for the purpose of establishing whether the compliance requirements have been met. We disclaim any assumption of responsibility for any reliance on this report to any person other than the directors of the Company and the Commerce Commission, or for any other purpose than that for which it was prepared.

### **Independence and quality control**

We complied with the Auditor-General's:

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

The Auditor-General, and his employees, and Deloitte Limited 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 Default Price-Quality Path and the annual audit of the Company's financial statements, we have no relationship with or interests in the Company.



Brett Tomkins  
**Deloitte Limited**  
**On behalf of the Auditor-General**  
Auckland, New Zealand  
30 August 2022