

DEFAULT PRICE QUALITY PATH COMPLIANCE STATEMENT FOR THE ASSESSMENT DATE 31 MARCH 2015

Pursuant to the Electricity Distribution Services Default Price-Quality Path Determination 2012

26 May 2015

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1) Compliance with the Price Path (Clause 11.2(a))

Top Energy Limited does comply with the price path in clause 8 at the assessment date 31 March 2015, as specified in the Electricity Distribution Default Price-Quality Path Determination 2012.

Clause 8.4 - The notional revenue (NR_t) of a Non-exempt EDB at any time during the Assessment Period must not exceed the allowable notional revenue (R_t) for the Assessment Period.

Compliance is demonstrated in the following tables. The first table demonstrates that notional revenue derived using posted prices at the end of the Assessment Period is less than allowable notional revenue. The second table demonstrates that the maximum notional revenue during the Assessment Period does not exceed allowable notional revenue thus illustrating that at no time during the Assessment Period is the price path breached.

Commerce Act (Electricity Distribution Default Price-Quality Path) Determination 2012 Commerce Act (Electricity Distribution Default Pricefor the Assessment Date 31 March 2015

Clause 8.4 The notional revenue (NRt) of a Non-exempt EDB at 31 March 2015 must not exceed the allowable notional revenue (Rt) for the Assessment Period such that:

Test: $\frac{NR2015}{R2015} \le I$ NR2015: \$ 28,666,166

R2015: \$ 33,975,390

Result: 0.8437 < 1

Result: Price Path has not been breached

Clause 8.4 The notional revenue (NRt) of a Non-exempt EDB at any time during the Assessment Period must not exceed the allowable notional revenue (Rt) for the Assessment Period such that:

Test: $\frac{NR_{Max}}{R2015} \le l$ NR_{Max}: \$ 28,666,166

R2015: \$ 33,975,390

Result: 0.8437 < 1

Result: Price Path has not been breached

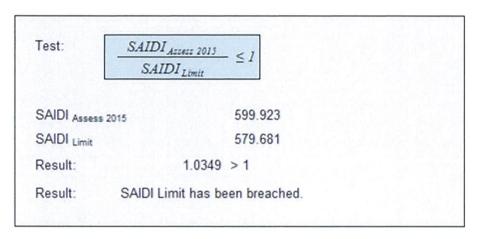
2) Compliance with the Quality Standards (Clause 11.2(a))

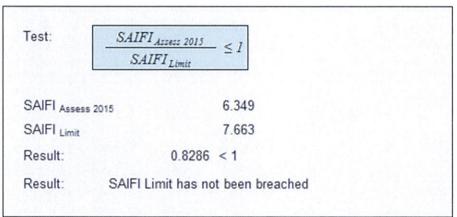
Top Energy Ltd did not comply with all requirements of the quality standards in clause 9 at the assessment date, 31 March 2015, as specified in the Electricity Distribution Default Price-Quality Path Determination 2012.

Clause 9.2 - A Non-exempt EDB's Assessed Values for an Assessment Period must not exceed its Reliability Limits for that Assessment Period.

Compliance is demonstrated in the following tables. The first table demonstrates non-compliance with the SAIDI Limit and the second table demonstrates compliance with the SAIFI Limit.

Clause 9.2 A Non-exempt EDB's Assessed Values for an Assessment Period must not exceed its Reliability Limits for that Assessment Period, such that:





Supporting evidence is presented in Appendices D and E.



3) Director Certification (Clause 11.3)

We, Paul Anthony Byrnes and Gregory Mark Steed, being directors of Top Energy Limited certify that, having made all reasonable enquiry, to the best of our knowledge and belief, the attached Annual Compliance Statement of Top Energy Limited, and related information, prepared for the purposes of the Electricity Distribution Default Price-Quality Path Determination 2012 are true and accurate.

Gregory Mark Steed

Paul Anthony Byrnes

Date: 26 May 2015



Deloitte.

INDEPENDENT AUDITOR'S REPORT

TO THE DIRECTORS OF TOP ENERGY LIMITED AND TO THE COMMERCE COMMISSION

The Auditor-General is the auditor of Top Energy Limited (the company). The Auditor-General has appointed me, Andrew Burgess, using the staff and resources of Deloitte, to provide an opinion, on her behalf, on whether the Annual Compliance Statement for the year ended on 31 March 2015 on pages 2 to 3 and 6 to 17 complies, in all material respects, with the Electricity Distribution Services Default Price-Quality Path Determination 2012 (the Determination).

Directors' responsibilities for the Annual Compliance Statement

The directors of the company are responsible for the preparation of the Annual Compliance Statement in accordance with the Determination, and for such internal control as the Directors determine is necessary to enable the preparation of an Annual Compliance Statement that is free from material misstatement.

Auditor's responsibility for the Annual Compliance Statement

Our responsibility is to express an opinion on whether the Annual Compliance Statement has been prepared, in all material respects, in accordance with the Determination.

Basis of opinion

We conducted our engagement in accordance with the International Standard on Assurance Engagements (New Zealand) 3000: Assurance Engagements Other Than Audits or Reviews of Historical Financial Information issued by the External Reporting Board and the Standard on Assurance Engagements 3100: Compliance Engagements issued by the External Reporting Board.

These standards require that we comply with ethical requirements and plan and perform our audit to provide reasonable assurance (which is also referred to as 'audit' assurance) about whether the Disclosure Information has been prepared in all material respects in accordance with the Determination.

An audit involves performing procedures to obtain evidence about the amounts and disclosures in the Annual Compliance Statement. The procedures selected depend on the auditor's judgement, including the assessment of the risks of material misstatement of the Annual Compliance Statement, whether due to fraud or error or non-compliance with the Determination. In making those risk assessments, the auditor considers internal control relevant to the company's preparation of the Annual Compliance Statement in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the company's internal control.

In relation to the price path set out in clause 8 of the Determination, our audit included examination, on a test basis, of evidence relevant to the amounts and disclosures contained on pages 2 and 6 to 10 of the Annual Compliance Statement.

In relation to the SAIDI and SAIFI statistics for the Reference Period and the Assessment Period ended on 31 March 2015, including the calculation of the Reliability Limits and the Assessed Values, which are relevant to the quality standards set out in clause 9 of the Determination, our audit included examination, on a test basis, of evidence relevant to the amounts and disclosures contained on pages 3 and 11 to 16 of the Annual Compliance Statement.

Our audit also included assessment of the significant estimates and judgements, if any, made by the company in the preparation of the Annual Compliance Statement.

Deloitte.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Use of this report

This independent auditor's report has been prepared for the directors of the company and for the Commerce Commission for the purpose of providing those parties with independent audit assurance about whether the Disclosure Information has been prepared, in all material respects, in accordance with the Determination. We disclaim any assumption of responsibility for any reliance on this report to any person other than the directors of the company or the Commerce Commission, or for any other purpose than that for which it was prepared.

Scope and inherent limitations

Because of the inherent limitations of an audit engagement, and the test basis of the procedures performed, it is possible that fraud, error or non-compliance may occur and not be detected.

We did not examine every transaction, adjustment or event underlying the Disclosure Information nor do we guarantee complete accuracy of the Disclosure Information. Also we did not evaluate the security and controls over the electronic publication of the Disclosure Information.

The opinion expressed in this independent auditor's report has been formed on the above basis.

Independence

When carrying out the engagement we followed the independence requirements of the Auditor-General, which incorporate the independence requirements of the External Reporting Board. We also complied with the independent auditor requirements specified of the Determination.

The Auditor-General, and her employees, and Deloitte 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 business, this engagement and the annual audit of the company's financial statements, we have no relationship with or interests in the company.

Opinion

In our opinion, the Annual Compliance Statement of Top Energy for the year ended on 31 March 2015, has been prepared, in all material respects, in accordance with the Determination.

Our audit was completed on 26 May 2015 and our opinion is expressed as at that date.

Andrew Burgess

Deloitte

On behalf of the Auditor-General

Auckland, New Zealand

Appendix A – Price Path Compliance Calculations (Clause 11.3)

Clause 8.4

Term	Description	Value \$
SPi,2015Qi, t-2	Prices at 31 March 2015 multiplied by 31 March 2013 Base Quantities	44,487,126
	Notional Posted discount YE 2015	(5,154,699)
P2015*Q2013	Prices at 31 March 2015 multiplied by 31 March 2013 Base Quantities	39,332,427
K2015	Transmission Charges for year ending 31 March 2015	5,824,018
	Ngawha Avoided Transmission Charges for year ending 31 March 2015	2,719,025
	Transpower purchase Avoided Transmission Charges for year ending 31 March 2015	1,893,130
	Rates for year ending 31 March 2015	28,365
V2015	Electricity Authority Levies for year ending 31 March 2015	80,983
	Complaints Comm ission charges for year ending 31 March2015	13,261
	Commerce Act Levies for year ending 31 March 2015 + 1/5 of Commerce Act Levies for year ending 31 March 2010	107,479
Total K&V 2015	Pass through and Recoverable Costs	10,666,261
NR2015	Notional Revenue for the year ending 31 March 2015	28,666,166

Supported by P*Q schedules presented in Appendix B

Maxi	mum Notional Revenue for the year end March 2015	ding
Term	Description	Value \$
PMax*Q2013	Maximum Prices between 1 April 2014 and 31 March 2015 multiplied by 31 March 2013 Base Quantities	39,332,427
K2015	Transmission Charges for year ending 31 March 2015	5,824,018
	Ngawha Avoided Transmission Charges for year ending 31 March 2015	2,719,025
	Transpower purchase Avoided Transmission Charges for year ending 31 March 2015	1,893,130
	Rates for year ending 31 March 2015	28,365
V2015	Electricity Authority Levies for year ending 31 March 2015	80,983
	Complaints Comm ission charges for year ending 31 March2015	13,261
	Commerce Act Levies for year ending 31 March 2015 + 1/5 of Commerce Act Levies for year ending 31 March 2010	107,479
Total K&V 2015	Pass through and Recoverable Costs	10,666,261
NR Max	Notional Revenue for the year ending 31 March 2015	28,666,166

Supported by P*Q schedules presented in Appendix B

Clause 8.3

	Allowable Notional Revenue 2015	
Term	Description	Value \$
Revenue adjustment term. N2014-NR2014	Last years under(over) recovery	2,919,015
P2014*Q2013	Prices at 31 March 2014 multiplied by 31 March 2013 Base Quantities (PQ2014)	37,216,891
K2014	Transmission Charges for year ending 31 March 2014	5,361,964
	Ngawha Avoided Transmission Charges for 2014	2,294,765
	Transpower purchase Avoided Transmission Charges for 2014	1,711,069
V2014	Rates for year ending 31 March 2014	25,879
V 2014	Electricity Commission Levies for year ending 31 March 2014	59,525
	Commerce Act Levies for year ending 31 March 2013 + 1/5 of Commerce Act Levies for year ending 31 March 2010	91,333
PQ2014-K2014-V2014	Total	30,591,372
X	X Factor	(0.10
(1 + DCPI2015)	Average change in Consumer Price Index	1.00965
R2015	Allowable Notional Revenue under the CPI-X Price Path for the year ending 31 March 2015	33,975,390

Supported by P*Q schedules presented in Appendix B

DCPI2015			
Numerator		Denominator	
CPIQ4,2012	1,169	CPIQ4,2011	1,158
CPIQ1,2013	1,174	CPIQ1,2012	1,164
CPIQ2,2013	1,176	CPIQ2,2012	1,168
CPIQ3,2013	1,187	CPIQ3,2012	1,171
Total	4706	Total	4661
DCPI2015		.97%	

Appendix B – Price and Quantity Schedules (Clause 11.3(a))

NB: The maximum NR (2015) prices and quantities are the same as NR (2015)

The continue 18 The	Number of Months																		
This control This	Number of Days:	365																	
Particular Par			Number of	Wh or two or twarb	Other Oty for		5. year	Notional Distrib	ution Revenue	Notional Other Revenue (\$)	Total Revenue S's	ICP Numbers eligible			Variable iscount c/kWh (Capped see note 4)	Notional Distribution Discount (5)	Notional Distribution Discount (\$)	Total Discount (S)	Total Revenue (\$)
Part	Tariff or Fee	Description	ICPs at 31/03/13	for 31/03/13	31/03/13		Variable (c/kwh)	Fixed	Variable	Fixed	EP LOUS Q 1 2013					Fixed	Variable		ΣΡ (2015 Q i 2013 Ness discount
The control of the	Non Time of Use																		
Physical content	UC	Uncontrolled	8,093			0.150	21,941	443,092	13,513,656		13,956,748	7,314	7,016,656 -	0.135 -	11.000	360,397	771,832		12,824,518
Purple Controlled Purp	PC	Partly Controlled	21253			0.150	14.773	1,163,602	19,903,786		21,067,388	21,702	23,871,095 -	0.135 -	11.000	1,069,366	2,625,820	- 3,695,187	17,372,201
Party Composed by 100 10	FC	Fully Controlled		5,688,691			6.081		345,929	1	345,929							,	345,929
Major Majo	DAY	Partly Controlled Day	906	11,578,712		0.150	16.283	49,604	1,885,362		1,934,965	920	1,005,953 -	0.135 -	11.000	45,333	110,655	- 155,988	1,778,977
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Coloratory Col	CAP150	Capacity	123			7.788	10.984	349,642	1,511,543		1,861,185	129	14,257,062 -	0.550 -	0.300	25,897	42,771	,	1,792,517
March Marc	CAP150FC	Capacity	60		-	7.645	10.984				22,323								22,323
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Marco Control Contro	Time of Use		09			22.420		490,998			490,998	63	-	0.550		12,647		- 12,647	478,351
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1 1 1 1 1 1 1 1 1 1	08:00 - 12:00			7,444,943			990'6		674,959		674,959		23,035,877	,	0.300		69,108	- 69,108	605,851
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2.231.Q. 2013 30.446 287.581.654 2.650 4.097.141 40.002.799 387.186 44.487.126 30,131 691.88.643 . 1.534.511 3.5020,186 . 5.154.699 39,33	UMLSHLPMC				555					94,720	94,720					Statement of the statem	The state of the s		94,720
30,446 267.561.654 2.650 4,097,441 40,002,799 387,486 44,487,126 30,131 69,186,643 . 1,534,541 . 3,620,186 . 5,154,699	UMLTH		The second secon		4					1,663	1,663								1,663
30,446 267,561,654 2,650 4,097,141 40,002,799 387,186 44,487,126 30,131 69,186,643 . 1,534,511 3,620,186 . 5,154,699																			
	EP, 2015 0; 2013		30.446	267.581.654	2.650			4.097.141	40.002.799	387,186	44,487,126	30,131	69,186,643			1.534,511	3,620,186		39,332,427

\(\sum_{\text{l.2014}} Q_{\text{i.s.}}\) Prices at 31 March 2014 multiplied by 31 March 2013 Base Quantities

Number of Months | 12 | 12

Tariff or Fee Description Non Time of Use Uncontrolled PC Partly Controlled FC Fully controlled PAY Partly Controlled Might Controlled CAP150 Capacity	Numbe ICP at 31/0									-				11-11-11			
ime of Use	at 31/0	With or two or twarth Other Ott for	Other Oty for	Line Tariff 1.4.2013 to 31.3.2014 year		Notional Distribution Revenue (5)		Notional Other Revenue (S)	Total Revenue (S)	ICP Numbers eligible	Kwh discounted	Fixed Discount \$/an. (See note 4)	Variable Discount c/kWh (Capped see note 4)	Notional Distribution Discount (\$)	Notional Distribution Discount (\$)	Total Discount (\$)	Total Revenue (S)
ime of Use			31/03/13	Fixed	Variable (c/kwh)	Fixed	Variable	Fixed	EP Long Q i 2013					Fixed	Variable		ΣΡ (1901 Q i 2013 Hets discount
ime of Use																	
9										The state of the s	The state of the s	The state of the s					
	8,093			0.150	20.718	443,092	12,760,400		13,203,492	7,314	7,016,656	- 0.135	11.000	- 360,397 -	771,832	- 1,132,230	12,071,262
0	d 21253	3 134,730,832		0.150	13.939	1,163,602	18,780,131		19,943,733	21,702	23,871,095	- 0.135	- 11.000	- 1,069,366 -	2,625,820	- 3,695,187	16,248,546
0		5,688,691			5.729		325,905		325,905				-			,	325,905
20	d Day 906	11,578,712		0.150	15.376	49,604	1,780,342		1,829,946	920	1,005,953	- 0.135	- 11.000	- 45,333 -	110,655	- 155,988	1,673,958
					2.472		124,658		124,658							,	124,658
	123			7.452	10.504	334,558	1,445,488	,	1,780,046	129	14,257,062	- 0.550	- 0.300	25,897 -	42,771	- 68,668	1,711,378
2:				7.377	10.504	21,541			21,541								21,541
						,											
Time of Use	8			21.631		473,719	•	,	473,719	63		- 0.550	,	- 12,647		- 12,647	461,072
00:00 - 04:00		4,067,614			0.252	-	10,250	,	10,250				,		,		10,250
04:00 - 08:00		5,197,416			0.399		20,738		20,738								20,738
08:00 - 12:00		7,444,943			8.719		649,125		649,125		23,035,877		- 0.300	,	69,108	- 69,108	580,017
12:00 - 16:00		7,131,653			10.317		735,773		735,773				- 0.300		,		735,773
16:00 - 20:00		6,386,368			14.858		948,887	,	948,887				- 0.300				948,887
20:00 - 24:00		4,960,436			4.865		241,325		241,325				- 0,300		,	,	241,325
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0000984310TEBBE				3,893,9800		1,421,303	,		1,421,303	2				- 13,913.80	***	- 13,914	1,407,389
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пигрн			09	0.7600			,	16,505	16,505					,			16,505
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EP : 2014 Q : 2013	30,446	267,581,654	2,650			4,161,382	37,823,022	387,186	42,371,590	30,131	69,186,643			1,534,511	3,620,186	- 5,154,699	37,216,891



Appendix C – Pass Through and Recoverable Costs (Clause 11.3(b) (c))

Pass Through and	Recoverable Cos	ts for year ending	March 2015	
K 2015	Actual (\$)	Forecast (\$)	Variance (\$)	Variance (%)
Transmission	5,824,018	5,824,018	(0)	(.)%
V 2015	Actual (\$)	Forecast (\$)	Variance (\$)	Variance (%)
Avoided Transmission Ngawha	2,719,025	2,719,025	(0)	(.)%
Avoided Transmission Transpower	1,893,130	1,833,762	59,368	3.14%
Rates	28,365	26,199	2,166	7.64%
Electricity Authority Levies	80,983	64,503	16,480	20.35%
Complaints Commission	13,261	_	13,261	100.%
Commerce Act Levies	107,479	100,594	6,885	6.41%
Total V2015	4,842,243	4,744,083	98,160	2.03%
Total Pass Through and Recoverable Costs	10,666,261	10,568,101	98,160	.92%

Note: Top Energy Limited had system fixed assets transferred from Transpower on 1 April 2012. The Avoided Transmission Transpower charge in the above table is consistent with clause 3.3.3(1)(b) of the IM Determination as required by clause 11.3(d).

Variance comments

Transmission

The Ngawha connection charge (\$59k) difference was deducted twice.

Rates

Price increases slightly higher than anticipated.

Electricity Authority Levies Levies higher than previous year with a prior period reconciliation of \$6k.

Compliants Comm.

Top Energy has commenced including this eligible deduction in 2015

Commerce Act Levies

Unexpected slight increase

Appendix D - Quality Standard Compliance Calculations (Clause 11.3(h))

Reliability Data (Before Normalisation)

Year	SAIDI (Interrupt	ion Duration)		SAIFI (Interrupt	ion Frequency)	
	Class B	Class C	Total	Class B	Class C	Total
2005	39.42	342.60	382.02	0.26	4.30	4.56
2006	22.30	499.80	522.10	0.14	5.43	5.57
2007	18.23	398.79	417.02	0.12	5.42	5.54
2008	36.63	781.67	818.30	0.34	6.05	6.39
2009	73.90	841.26	915.16	0.60	10.28	10.88
	Reference F	Period Total SAIDI	3,054.60	Reference	Period Total SAIFI	32.94
	Reference Pe	eriod Average SAIDI	610.92	Reference P	eriod Average SAIFI	6.59
2015	251.80	1,585.99	1,837.79	0.96	5.42	6.38

Reliability Limit Calculations

αsaidi	-0.8549	The average of the natural logarithm (In) of each daily SAID Value in the non-zero data set
β SAIDI		The standard deviation of the natural legarithm (In) of each

αsaifi	-5.5484	The average of the natural logarithm (In) of each daily SAIFI Value in the non-zero data set
βsaifi	2.1216	The standard deviation of the natural logarithm (In) of each daily SAIFI Value in the non-zero data set
B _{SAIFI} = e ^(α SAIFI + 2.5* β SAIFI)	0.7831	SAIFI Boundary Value

Event Days exceeding SAIDI Boundary Value within the Reference Dataset Pre-Normalised SAPre-Normalised SANOrmalised SAIDI Normalised SAIFI 18-Sep-05 92.9493 0.5012 50.9313 0.5012 10-Jul-07 356.6218 0.8237 50.9313 0.7831 15-Apr-08 76.0172 1.0207 50.9313 0.7831 26-Jul-08 223.6803 1.0487 50.9313 0.7831 30-Jul-08 102.1547 0.8342 50.9313 0.7831

SAIDI Limit

M SAIDI	491.5663	The average annual SAIDI Value in the Normalised Reference Dataset
σsaidi	88.1148	The standard deviation of daily SAIDI Values in the Normalised Reference Dataset multiplied by √365
SAIDI _{Limit} = μ _{SAIDI} + σ _{SAIDI}	579.6811	SAIDI Limit Value

SAIFI Limit

₩SAIFI	6.4685	The average annual SAIFI Value in the Normalised Reference Dataset
σ _{SAIFI}	1.1942	The standard deviation of daily SAIFI Values in the Normalised Reference Dataset multiplied by √365
SAIFI _{Limit} = μ _{SAIFI} + σ _{SAIFI}	7.6627	SAIFI Limit Value

Reliability Assessment Calculations

Event Days exceeding SAIDI and SAIFI Boundary Value within the Assessment Dataset

Date	Pre-Normalised SAIDI	Pre-Normalised SAIFI	Normalised SAIDI	Normalised SAIFI
17-Apr-14	78.0001		50.9313	-
8-Jul-14	1,143.0076		50.9313	-
1-Feb-15	135.1951		50.9313	-
15-Mar-15	85.3913	Control of the second	50.9313	-
8-Jul-14		0.8185	-	0.7831
			-	-
			-	-
			-	-

Assessed SAIDI Value

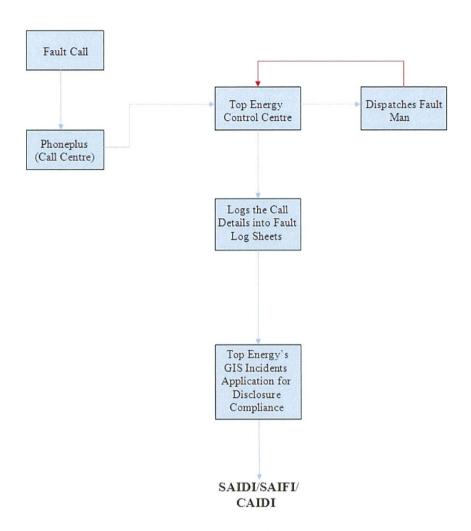
SAIDI ₂₀₁₅	599.923	The sum of daily SAIDI Values in the 1 April 2014 - 31 March 2015 Normalised Assessment Dataset

Assessed SAIFI Value

SAIFI ₂₀₁₅	6.349 The sum of daily SAIFI Values in the 1 April 2014 - 31 March 2015 Normalised Assessment Dataset
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Appendix E - Policies and Procedures for Recording SAIDI and SAIFI (Clause 11.3(i))

Top Energy Limited records data for network performance from its network Control Centre. The following flow diagram outlines the process that manages the recording and production of quality performance statistics.



Top Energy Faults Management Process

1 PLANNED OUTAGES

Planned outages are maintained by the Control Centre. They;

- 1. schedule the work with the Field Staff,
- 2. conduct and coordinate the switching on the network. These details are recorded by action, date and time on 'Switching Procedure Sheet' following a predetermined switching plan.

2 UNPLANNED OUTAGES

Unplanned outages are initiated either by a fault call received by our in house Call Centre (PHONEplus) or by receiving a direct protection equipment alarm generated directly out of the SCADA system. A call detail record is entered into the Call Centre's call management system (CMS), this is completed by the Call Centre operators who identify key information about the interruption, such as: time, fault description, name and contact details of the caller.

Subsequently the control Centre Operator will dispatch a Fault Man directly or via the contractor's Faults Coordinator, log the fault, and enter the relevant details in the log. As part of managing the restoration of supply, the Control Centre Operator records the devices that are operated and the times they are operated on the 'Switching Procedure Sheet'. All HV and EHV faults are additionally recorded electronically via the SCADA system which provides an accurate record of the operation, time and date factors of the outage.

The data generated by the SCADA alarm only records faults on a feeder and the time that the circuit tripped. The event logs are not a complete switching record, as they do not provide evidence of the time that consumers down the feeder were restored.

The reason that no automatic record is created in SCADA for minor faults is that the alarms are placed on the first circuit breaker or reclosers on the feeder. The circuit breakers are designed so they do not trip needlessly with every small fault further down the feeder, meaning that there will only be alarms created for events exceeding momentary supply interruptions.

Therefore, the sources of recorded information from individual events are from three sources;

- (a) Call detail sheet from the call management system (CMS) which is logged by the Call Centre
- (b) Switching procedure sheets
- (c) Computer generated records from the SCADA System.

Once the outage is completed and all power is restored, the information gathered from the call detail sheet, switching procedure sheet, SCADA records and any other relevant information to form a network performance pack.

3 NETWORK PERFORMANCE PACK

The network performance pack is assembled to provide verified event data, to ensure accurate data entry into the GIS Incident Application. The time the customers are without power, number of customers affected is calculated by the GIS Incidents application. The control centre operators also allocate each fault a cause code so that they can be categorised for disclosure purposes.



4 GIS INCIDENT APPLICATION

Top Energy Limited has been using its fully upgraded GIS Incident Application since 1 April 2009. Top Energy Limited is recording network interruptions and generating the Network Performance Indexes, such as SAIDI and SAIFI, using this GIS Incident program. On a monthly basis, the database is reviewed for reasonableness by the Control Centre Manager. After the data is reviewed, network quality graphs and a summary monthly report of reliability statistics form part of the General Manager Network's report to the Board of Directors. On a six monthly basis, the statistics are summarised and reported as part of the Company's Financial Report, with comparison against targets set out in the Company's Statement of Corporate Intent.

The GIS incidents system calculates customer outage minutes from the network outage data entered into the system.

The system calculates the customer outage minutes for each individual operation, by recording the time stamped operation of each switchable device, and counting the number of ICP's connected beyond the device. A report is then generated from the data where the SAIDI and SAIFI are stated. For disclosure the averaged ICP count is used.

The equation used by GIS Incidents to calculate customer minutes

 Σ (Outage Duration₁ x ICP Count₁) + (Outage Duration₂ x ICP Count₂) +.... (and so on for each outage duration)

Each GIS Incident that is inputted is reviewed and checked by the Control Centre Manager. Each month's results are checked for reasonableness, thus equates to 12 checks each year end.

A report is generated from the Report Manager, which shows the SAIDI and SAIFI calculations for the period.

For all outages the GIS Incident Application calculates the number of affected customers. The ICPs affected are automatically populated from the GIS system. With a fully integrated GIS & ICP database of our network, Top Energy uses its GIS system to report the number of customers beyond every isolation device on the network. The customer count is extracted from the GIS system, which is linked to the ICP database.

For the assessment period ending 31 March, Top Energy had been using the accurate customer count as at 31 March of the relevant year. To determine the total number of consumers on our network, Top Energy maintains an ICP database (Club ICP) which is based on the industry maintained Registry equivalent. The ICP database has been maintained consistently in compliance with relevant Rules and Regulations. The result is used for internal reporting and performance management throughout the year. For disclosure purposes the average of the Total ICP counts at 31 March year start and 31 March year end.

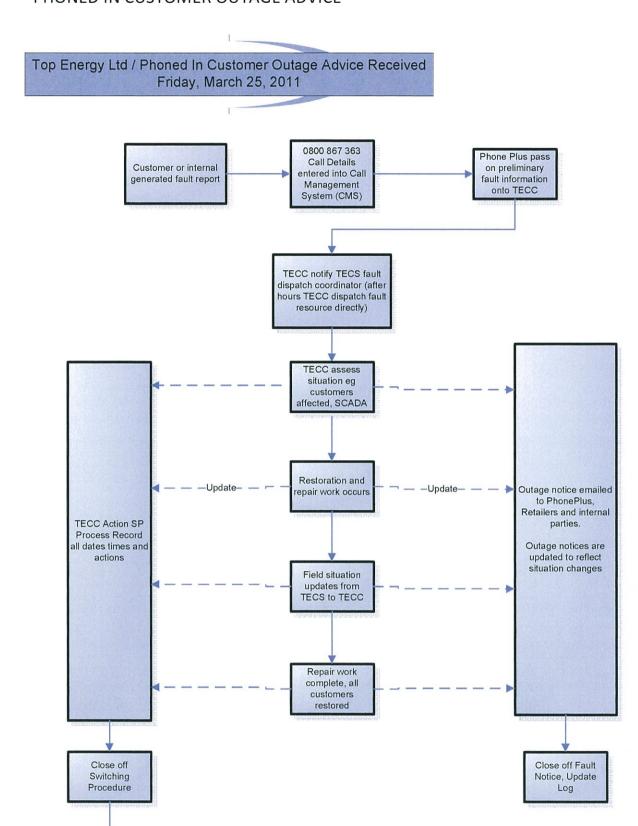
The Customer count data is taken from the Electricity Registry.

E.G. The average ICP count for 2015 was calculated as the sum of the 31 March 2014 + 31 March 2015 ICP, (31672+31901)/2, counts divided by 2.

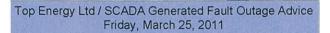
To ensure the accuracy of ICPs in Geographical Information System (GIS) an automatic trace is set to run on a daily basis. The trace runs through the connected model and gathers total ICPs per feeder. The trace results are

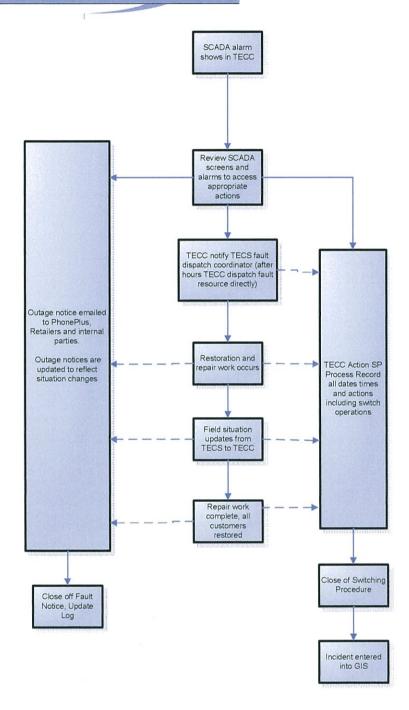
compared against the previous days trace and outputted into a report showing the difference between the two traces, categorised by feeder. The report is e-mailed to the GIS Manager each morning and reviewed. If there is a significant ICP difference the connectivity of the feeder is further investigated in GIS, and when remedied the trace is rerun manually.

In addition, a weekly trace is run to ensure number of ICP's in Club ICP database matches number of ICPs connected in GIS by the GIS Administrator. The report outputs total number of ICPs in Club ICP application and the total number of ICPs in GIS, the difference between the two databases categorised by feeders. The report also lists ICP numbers which are not placed in GIS. This report is reviewed and rectified by GIS Technician as appropriate.

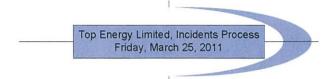


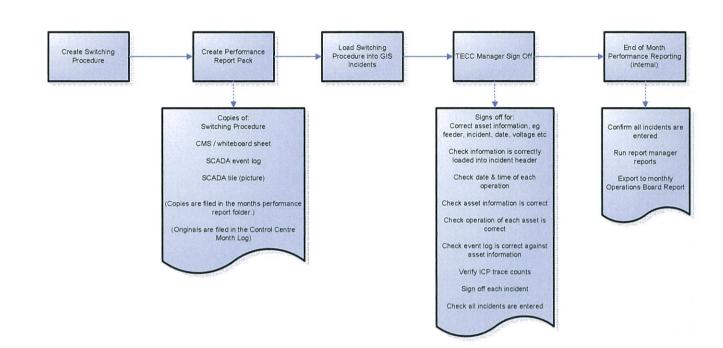
Incident entered into GIS





7 INCIDENTS PROCESS





8 PROCESS FOR SUPPLYING OUTAGE DATA FOR AUDITOR

Top Energy Network Operations will receive a request in the following March of each year to provide a spreadsheet of Top Energy outage events. The Auditor will specify a selection of outage events for compliance audit. Once the audit selection process has been confirmed, Top Energy will package the relevant outage information and hold on site ready for the audit.

