



Default Price-Quality Path Annual Compliance Statement

Powerco Electricity Distribution Services



Assessment Period: 01 April 2023 – 31 March 2024

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1. Summary

Powerco is required to annually report on compliance with its price-quality path

Powerco Limited's electricity distribution business ("Powerco") is subject to regulation under the Commerce Act 1986. For the year ending March 2024 Powerco was subject to default price-quality path (DPP) requirements, having transitioned to this from a customised price-quality path (CPP). The requirements of the DPP apply for the final two years (1 April 2023 to 31 March 2025) of the five-year period as set out the DPP Determination.

The DPP requirements are set out in the Electricity Distribution Services Default Price-Quality Path (Powerco transition) Amendments Determination 2022¹ ("Determination"). The Determination requires Powerco to provide an annual compliance statement ("Statement") to the Commission within 5 months after the end of each assessment period

This Statement confirms that Powerco:

- complies with the requirement to calculate the wash-up amount for the assessment period (section 2)
- complies with the quality standards for the assessment period (section 3)
- has not entered into any agreement with another EDB or Transpower for an amalgamation, merger, major transaction or non-reopener transaction in the assessment period (section 4)

Powerco is available to assist the Commission with its review of this Statement and will provide any additional information as requested.

This statement was prepared by and approved on the 22nd August 2024. It was published and made publicly available on the 30th August 2024 in accordance with the Determination. A copy is available at Powerco's principal office (Powerco, 35 Junction Street, New Plymouth). The Statement is published on Powerco's website (www.powerco.co.nz) and additional copies can be provided on request.

¹ [Electricity Distribution Services Default Price-Quality Path \(Powerco transition\) Amendments Determination 2022](#)

2. Assessment against the price path

Each year Powerco calculates an annual ‘wash-up’ of the difference between revenue received and allowable revenue adjusted for actual CPI, pass-through costs and recoverable costs. The purpose of the wash-up mechanism is to restore Powerco to the position it would have been in had the forecasted quantities, pass through and recoverable costs, and level of CPI been made with perfect foresight, taking account of the time value of money.

The wash-up amount for this 2024 assessment period will be included in the calculation of allowable revenue and price-setting for the year ending 2026. The two-year differential reflects the timing between the end of this assessment period (March), finalising actual revenues (around September) and setting prices for the following year (occurs around December).

For presentation purposes, the tables set out in this section are aggregates of the price and quantity information. While dollar balances are rounded to the nearest thousand dollars, the underlying compliance calculations apply the whole number and are reflected in the totals. The rounding of each component may result in tables which look like they don't add up - this is the rounding effect.

2.1 Calculation of the revenue wash-up amount

The Determination requires the wash-up amount to be calculated as demonstrated by table 1. The three components of this calculation are described in more detail throughout section 3 of this Statement.

Table 1: Wash-up amount calculation

Calculation components	\$000
Actual allowable revenue	428,612
Less: Actual revenue	411,569
Less: Revenue forgone	-
Wash-up amount 2024	17,043

Calculation specified in Schedule 1.6 of the Determination

The positive wash-up amount indicates an under recovery of revenue. This will be recoverable in PY26 by adding it to allowable revenue, adjusting for the time-value of money.

2.2 Calculation of actual allowable revenue

The first step is to calculate what should have been allowed for 2024: actual allowable revenue. The Determination defines actual allowable revenue as in table 2. The calculation of each component is explained in subsequent sections.

Table 2: Actual allowable revenue calculation

Calculation components	\$000
[a] Actual net allowable revenue	321,696
[b] Plus: Actual pass-through costs	5,005
[c] Plus: Actual recoverable costs	86,617
[d] Plus: Revenue wash-up draw down amount	14,536
[e] Plus: 2024 pass-through balance compensation	758
Actual allowable revenue	428,612

Specified in Schedule 1.6(9) of the Determination

[a] Actual net allowable revenue

Actual net allowable revenue is the maximum revenue, excluding pass-through costs and recoverable costs and any wash-up draw down amount, that Powerco can earn in the assessment period. This is specified in Schedule 1.1 (3) of the Determination as the starting prices for the fourth assessment period.

[b][c] Actual pass-through and recoverable costs

Tables 3 and 4 contain actual pass-through and recoverable costs for 2024, with a comparison to forecast for reference. Actual pass-through costs were \$269k higher than forecast driven by differences in regulatory levies and rates. These can be difficult to forecast given the mismatched financial years along them being based on whole-of-sector inputs and actions e.g., generation and demand.

Table 3: Actual and forecast pass-through costs

Pass-through costs	Actual \$000	Forecast \$000	Variance \$000
Electricity Authority levies	976	985	(9)
Commerce Commission levies	1,298	1,112	186
Utility Disputes levies	236	300	(64)
Local Authority rates	2,495	2,339	156
Total	5,005	4,736	269

Table 4: Actual and forecast recoverable costs

Recoverable costs	Actual \$000	Forecast \$000	Variance \$000
Opex IRIS incentive adjustment	(5,010)	(5,010)	0
Capex IRIS incentive adjustment	(702)	(702)	0
Transpower connection charges	16,764	16,282	482
Residual Charge Avoided liability from the purchase of transmission assets from Transpower	55,593	55,851	(259)
Transpower new investment charges	6,631	6,631	0
Benefit-based charge System Operator services	14,601	14,601	0
Transitional Cap Recovery Charge	259	0	259
Avoided Cost of Transmission (ACOT)	(302)	0	(302)
Quality incentive adjustment	(1,339)	(1,339)	0
Capex wash-up adjustment	0	0	0
Fire and Emergency NZ levies	125	0	125
Total	86,617	86,312	305

For the 2024 assessment period actual recoverable costs were \$305k higher than forecast, driven by the difference between the actual and forecast Transpower connection charges.

[d] Revenue wash-up draw down amount

The revenue wash-up draw-down amount represents any under or over recovery of revenue from two years prior (2022). It is calculated in accordance with schedules 1.6 and 1.7 of the Determination. The 'revenue wash-up draw down amount' for this fourth assessment period of DPP3 (2024) is \$14.536m, derived as in table 5.

Table 5: 2024 revenue wash-up draw-down amount

Calculation components	\$000
Wash-up amount 2022	12,748 ²
Plus: adjustment for 67th percentile estimate of post-tax WACC	1,787
Revenue wash-up draw down amount 2024	14,536

² See table 1 of the 2022 Annual Compliance Statement <https://www.powerco.co.nz/who-we-are/disclosures-and-submissions/electricity-disclosures>

[e] 2024 pass-through balance compensation

For the fourth assessment period of the DPP regulatory period the wash-up amount for Powerco Limited includes the 2024 pass-through balance compensation in accordance with the equation outlined in schedule 1.6 (1)(9) of the Determination.³

2.3 Calculation of actual revenue

Actual revenue is calculated in table 6 as:

- actual revenue from prices is the sum of each price multiplied by each corresponding actual quantity and,
- other regulated income is income associated with the supply of electricity distribution services, other than through prices, investment related income, capital contributions, or vested assets. Notably, other regulatory income includes gains and losses on asset disposals.

Table 6: Actual revenue calculation

Calculation components	\$000
Actual revenue from prices	427,234
Plus: Other regulated income	(15,665)
Actual revenue	411,569

Specified in clause 4.2 of the Determination

Attachment A contains all schedules of prices and actual quantities used to calculate actual revenue from prices. These schedules total \$427.436m, \$202,000 higher than actual revenue from prices disclosed above. The difference relates to prior period revisions that are receipted in the current year. The actual revenue of \$427.234m reconciles to the general ledger.

Table 7 summarises the sources of other regulated income.

Table 7: Other regulated income

Calculation components	\$000
Gains/losses on asset disposals	(19,545)
Other regulated income	3,880
Total other regulated income	(15,665)

The value of gains and losses on disposals is consistent with the value reported in the 2024 Information Disclosure. Schedule 15 in that disclosure includes a discussion about the underlying methodology used to calculate this figure.

³ This pass-through balance relates to a correction of a DPP2 pass through balance technical error relating to the drafting of a mathematical formula. This is described in detail in the [Powerco DPP3 transition reasons paper \(para 4.6 - 4.18\)](#)

2.4 Calculation of revenue foregone

Revenue forgone for 2024 is zero due to the revenue reduction percentage for 2024 being 0.01%, which is below the 20% threshold (table 8).

Table 8: Revenue reduction percentage calculation

Calculation components	\$000
Actual revenue from prices	427,234
Forecast revenue from prices	427,278
Revenue reduction percentage	0.01%
Revenue forgone	Nil

The percentage is specified in clause 4.2 of the Determination as $1 - (\text{actual revenue from prices} / \text{forecast revenue from prices})$

The revenue forgone component of the wash-up calculation places a cap on the amount of revenue that may be recovered through the wash-up mechanism. This can occur if there is a reduction in revenue from prices exceeding 20% of allowable revenue. This would most likely occur due to a significant reduction in demand.

3. Assessment against the quality path

This section outlines how Powerco has complied with the quality standards set in the DPP quality path and the calculation of the quality incentive adjustment. Separate planned and unplanned quality standards apply.

Planned interruptions quality compliance is demonstrated as the sum of Powerco’s planned SAIDI (SAIFI) assessed values for the two DPP assessment periods (2024, 2025), not exceeding the adjusted planned accumulated SAIDI (SAIFI) limit specified in clause 9.5 and Schedule 3.1 of the Determination.

Unplanned interruptions quality compliance is demonstrated each assessment period by Powerco’s unplanned SAIDI (SAIFI) assessed values, not exceeding the unplanned SAIDI (SAIFI) limit specified in Schedule 3.2 of the determination

For presentation purposes, the tables in this section are aggregates of the SAIDI and SAIFI information. While results are rounded to two(four) decimal places for SAIDI(SAIFI), the underlying calculations apply the whole number.

3.1 Planned interruptions

Planned SAIDI and SAIFI comprises all planned Class B interruptions on Powerco’s network for the assessment period.

Clause 9.1 of the Determination specifies Powerco (a non-exempt EDB) must comply with the planned interruptions reliability cap specified in clause 9.2 for the DPP regulatory period.

Clause 9.2 specifies that compliance is achieved at the end of the fifth assessment period of the DPP regulatory period, if the sum of Powerco’s planned SAIDI (SAIFI) assessed values do not exceed the planned accumulated SAIDI (SAIFI) limit specified in Schedule 3.1 or, where applicable, the adjusted planned accumulated SAIDI (SAIFI) limit.

The adjusted planned accumulated SAIDI (SAIFI) limited does apply to Powerco, per Clause 9.5 of the Determination, as we have transitioned from a CPP onto the DPP in 2024 during the DPP regulatory period (2021-2025). The adjusted limit is calculated by dividing the five-year SAIDI (SAIFI) limit specified in Schedule 3.1 by five and multiplying by the number of years the DPP applies to Powerco, being two years (2024 and 2025).

Compliance with the adjusted planned accumulated SAIDI limit

Table 9: Planned interruptions SAIDI reliability assessment

DPP Requirement	Result
Planned accumulated SAIDI limit for the regulatory period	772.50
Adjusted planned accumulated SAIDI limit for the regulatory period	309.00
Planned SAIDI assessed value for the fourth assessment period	72.33
Planned accumulated SAIDI to the fourth assessment period	72.33
Annual average of adjusted planned accumulated SAIDI limit	154.50
Compliance Assessment	Complies

Calculation of Planned SAIDI assessed value for the fourth assessment period

Schedule 3.1 (2) specifies the calculation components and formula to calculate the planned SAIDI assessed value (*SAIDI planned, assessed*) for an assessment period as being:

$$SAIDI_{planned, assessed} = SAIDI_B + \frac{SAIDI_N}{2}$$

Table 10: Calculation of planned SAIDI assessed value

Component	Description	Result
<i>SAIDI_B</i>	is the sum of the SAIDI values:	
	(a) Class B interruptions that are not Class B notified interruptions;	22.67
	(b) Class B notified interruptions occurring partially or wholly outside of their specified notified interruption window or alternate day, the SAIDI value attributable to the period of minutes that falls outside of that specified notified interruption window or alternate day.	10.54
	(a) + (b) = SAIDI_B	33.22
<i>SAIDI_N</i>	is the sum of:	
	(a) the SAIDI values of notified interruptions falling inside the interruption window or alternate day; being the greater of:	
	(i) the duration of minutes accumulated for each ICP that the Class B notified interruption occurred for; and	73.41
	(ii) the period of the notified interruption window minus two hours;	
	(b) the 'intended SAIDI values' of any intended interruption cancelled without notice; being the greater of:	
(i) the duration of minutes accumulated for each ICP that the intended interruption occurred for, which will be nil; and	4.82	
(ii) the period of the notified interruption window minus two hours; and		
(c) the 'intended SAIDI values' of any intended interruption cancelled with notice, where the 'intended SAIDI value' for each of those intended interruptions cancelled with notice is nil.	0.00	
	(a) + (b) + (c) = SAIDI_N	78.23
<i>SAIDI_B</i> + (<i>SAIDI_N</i> / 2)	SAIDI planned, assessed	72.33

Compliance with the adjusted planned accumulated SAIFI limit

Table 11: Planned interruptions SAIFI reliability assessment

DPP Requirement	Result
Planned accumulated SAIFI limit for the regulatory period	3.5113
Adjusted planned accumulated SAIFI limit for the regulatory period	1.4045
Planned SAIFI assessed value for the fourth assessment period	0.4269
Planned accumulated SAIFI to the fourth assessment period	0.4269
Annual average of adjusted planned accumulated SAIFI limit	0.7023
Compliance Assessment	Complies

Planned interruption reporting

Powerco has complied with clauses 9.1 and 9.2 of the Determination, not exceeding the planned SAIDI and SAIFI limits for the assessment period, therefore is not required to provide the Commission with 'planned interruption reporting' per clause 12.1 of the Determination.

3.2 Unplanned interruptions

Unplanned SAIDI and SAIFI comprises all planned Class C interruptions on Powerco's network for the assessment period.

Clause 9.7 of the Determination specifies Powerco (a non-exempt EDB) must comply with the annual unplanned interruptions reliability assessment specified in clause 9.8 for the assessment period.

Clause 9.8 specifies that to comply with the annual unplanned interruptions reliability assessment, Powerco's unplanned SAIDI (SAIFI) assessed value for unplanned interruptions for the assessment period must not exceed the unplanned SAIDI (SAIFI) limit specified in Schedule 3.2.

Compliance with the unplanned SAIDI limit

Table 12: Unplanned interruptions SAIDI reliability assessment

DPP Requirement	Result
Unplanned SAIDI limit	180.25
Unplanned SAIDI assessed value	139.38
Compliance Assessment	Complies

Compliance with the unplanned SAIFI limit

Table 13: Unplanned interruptions SAIFI reliability assessment

DPP Requirement	Result
Unplanned SAIFI limit	2.2684
Unplanned SAIFI assessed value	1.5729
Compliance Assessment	Complies

3.3 Unplanned SAIDI and SAIFI calculations

Unplanned SAIDI

To calculate unplanned SAIDI, the assessment dataset is populated by listing all unplanned (Class C) interruptions on Powerco’s network for the assessment period. Unplanned SAIDI is normalised for major event days (“MED”).

A SAIDI MED occurs when the sum of SAIDI values for any period of 24 hours, that starts on the hour or half past the hour, exceeds the SAIDI unplanned boundary value. For the current regulatory period the SAIDI unplanned boundary value is 9.82 minutes.

Table 14: Calculating Powerco’s unplanned SAIDI assessment values

Calculation components	Result
Assessment dataset for SAIDI <i>Total unplanned SAIDI for the assessment period</i>	146.65
Normalise assessment dataset (1 MEDs) <i>For each 30 minute period within a SAIDI major event, if the unplanned SAIDI value exceeds 1/48th of the SAIDI unplanned boundary value, this unplanned SAIDI value is replaced with 1/48th of the SAIDI unplanned boundary value.</i>	(7.27)
Unplanned SAIDI assessed value	139.38

Major event days in the assessment period

There was one SAIDI major event day in the assessment period:

Table 15: SAIDI major event day

Start Time & Date		End Time & Date		SAIDI Value Before normalisation	SAIDI Value after normalisation
16 September 2023	23:30	18 September 2023	12:00	11.202	3.931

Further information on major event days is included in Attachment B - Commentary on major event days

Unplanned SAIFI

To calculate unplanned SAIFI, the assessment dataset is populated by listing all unplanned (Class C) interruptions on Powerco’s network for the assessment period. Unplanned SAIFI is normalised for MEDs.

A SAIFI MED occurs when the sum of SAIFI values for any period of 24 hours, that starts on the hour or half past the hour, exceeds Powerco’s SAIFI unplanned boundary Value of 0.0628.

Table 16: Calculating Powerco’s unplanned SAIFI assessment values

Calculation components	Result
Assessment dataset for SAIFI <i>Total unplanned SAIFI for the assessment period</i>	1.5729
Normalise assessment dataset (0 MEDs) <i>For each 30 minute period within a SAIFI major event, if the unplanned SAIFI value exceeds 1/48th of the SAIFI unplanned boundary value, this unplanned SAIFI value is replaced with 1/48th of the SAIFI unplanned boundary value.</i>	0.000
SAIFI unplanned	1.5729

3.4 Quality incentive adjustment

The quality incentive adjustment must be calculated by Powerco within 5 months after the expiration of the assessment period in accordance schedule 4 of the Determination and is a recoverable cost in the assessment period following that in which it was calculated (2026 pricing year).

To satisfy clause 11.6(e) of the Determination, Powerco’s target, collar, cap, incentive rate for planned and unplanned SAIDI is presented below as well as the supporting calculations for the quality incentive adjustment amount for the 2026 pricing year.

Table 17: SAIDI quality measures

Interruption type	Target	Collar	Cap	Incentive rate (IR)
Unplanned	151.96	-	180.25	\$47,908
Planned	51.50	-	154.50	

Quality incentive adjustment

The quality incentive adjustment for Powerco is calculated as the lessor of:

- (i) The sum of:
 - A. $(SAIDI_{unplanned,target} - SAIDI_{unplanned,assessed}) * IR;$
 - and
 - B. $(SAIDI_{planned,target} - SAIDI_{planned,assessed}) * 0.5 * IR;$

and

- (ii) the revenue at risk $(0.02 * ANAR_{2024})$

That sum is adjusted for the time-value of money by multiplying the sum in accordance with the following formula-

$$(1 + 67\text{th percentile estimate of post-tax WACC})^2$$

Table 18: Quality incentive adjustment calculation

Component	A. (SAIDI _{unplanned})	B. (SAIDI _{planned})
Target	151.96	51.50
- Assessed	139.38	72.33
* Multiplier	1.0	0.5
* Incentive Rate	\$47,908	
Subtotal	\$602,616	(\$498,957)
A + B	\$103,659	
ANAR ₂₀₂₄	321,696,000	
Revenue at risk $(0.02 * ANAR_{2024})$	\$6,433,920	
Lessor of: (A + B or revenue at risk)	\$103,659	
Time value of money (WACC=4.23%)	\$8,955	
Quality incentive adjustment for the 2026 assessment period	\$112,614	

3.5 Reliability policies and procedures

Recording interruptions

Powerco has well developed processes to capture outage / interruption information and ensure the accuracy of these records. Key aspects of this calculation include:

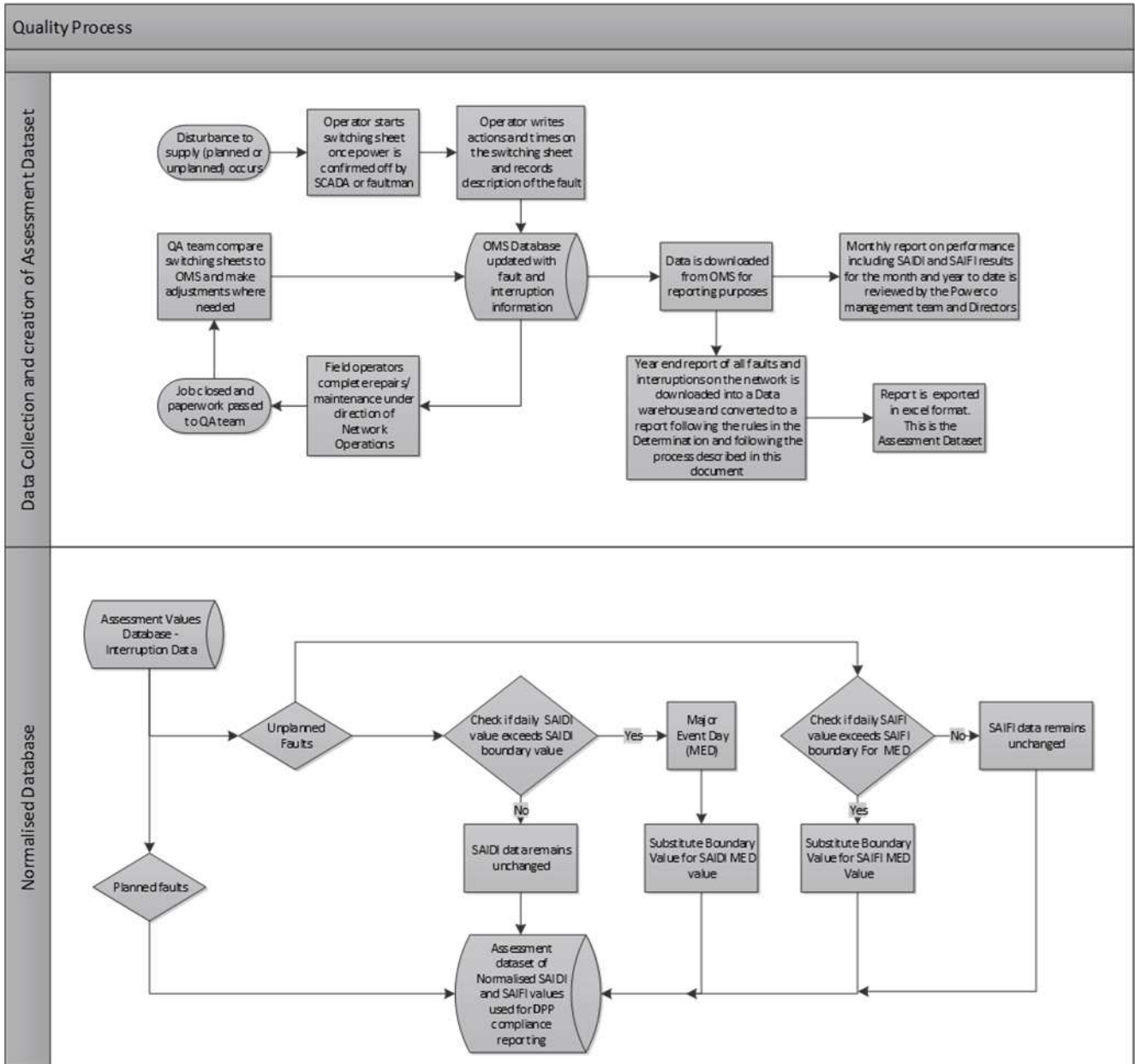
- The underlying reliability records are created and maintained by Powerco's Network Operations Team which initiate and manage all fault reports.
- The start of an interruption is recorded when there is a SCADA alarm for assets that have a real time link to Powerco's SCADA system. For other assets, which is the majority on our network, the interruption is recorded when Powerco is first notified of the fault by retailers or field staff.
- All fault reports contain switching sequences and where available SCADA printouts of transformers and areas affected, along with any other relevant information to support accurate evaluation.
- Details on the fault report are entered into the Powerco Outage Management System ("OMS") database. Information recorded includes the date, time and cause of the fault, voltage of the faulted circuit and the transformers affected.
- Powerco notes the introduction of new systems to assist with the management of outages and interruptions during the 2015 assessment period. This OMS provides enhanced oversight and recording of outages, enhancing the robustness of recording processes.
- The faults recorded may be due to third party causes (transmission problems, generation problems, or the actions of other electricity industry participants or third parties) this information is also recorded in the OMS database but excluded for compliance reporting.
- When power is restored for less than one minute following an initial interruption the successive interruption is not counted as a new SAIFI event. The duration of the successive interruption is added to the duration of the initial interruption. This is consistent with prior year treatment.
- When power is restored for one minute or longer following an initial interruption the successive interruption is counted as a new SAIFI event. The duration of the successive interruption is assigned to the new SAIDI event. This is consistent with prior year treatment.

Calculating SAIDI and SAIFI

In utilising the input data noted above, Powerco applies processes to ensure compliance with Schedules 3.1 and 3.2 of the Determination, as shown diagrammatically in Figure 1. The following key calculation steps are applied:

- To calculate SAIDI and SAIFI customer connection numbers ("ICPs") are calculated from the Geographic Information System ("GIS") for the transformers affected. ICPs are updated to the GIS daily from the Electricity Registry.
- The customer connection number used in the annual calculation of SAIDI and SAIFI is the average of customer numbers at the end of each month of the assessment year. The sum of all customer minutes interrupted is divided by the average customer connection numbers to derive the annual SAIDI minutes. The sum of the number of customer interruptions is divided by the average customer connection numbers to derive the annual SAIFI value.
- Results are calculated using the outage / interruption records in OMS noting a range of global corrections and refinements are required as set out below.
- As specified by the Determination, data is limited to include only Powerco interruptions that cause a cessation of electricity for a period of at least one minute, affect at least one consumer and occur on an electricity line capable of conveying electricity at a voltage of at least 3.3 kV.
- The unplanned data is normalised to account for the impact of MEDs.

Figure 1: Powerco's process to create the normalized dataset



4. Major transactions

Powerco has not entered into any agreement with another EDB or Transpower for an amalgamation, merger, major transaction or non-reopener transaction in the assessment period.

5. Directors' certificate

**Director's Certificate for the Default Price-quality Path
Annual Compliance Statement
For the period 1 April 2023 – 31 March 2024**

I, John Loughlin, being a director of Powerco certify that, having made all reasonable enquiry, to the best of my knowledge and belief, the attached annual compliance statement of Powerco, and related information, prepared for the purposes of the *Electricity Distribution Services Default Price-Quality Path Determination 2020* has been prepared in accordance with all the relevant requirements.

Director

22 August 2024

Date

6. Auditor's report



INDEPENDENT ASSURANCE REPORT TO THE DIRECTORS OF POWERCO LIMITED

Report on Powerco Limited's Electricity Default Price-Quality Path Annual Compliance Statement 2024

We have conducted a reasonable assurance engagement on Powerco Limited's ('the Company') compliance with the Electricity Distribution Services Default Price-Quality Path Determination 2020 as amended by the Electricity Distribution Services Default Price-Quality Path (Powerco transition) Amendments Determination 2022 issued 30 November 2022 ('the Determination') in relation to the preparation of the Company's Annual Compliance Statement ('the Annual Compliance Statement') on pages 3 to 17 for the period 1 April 2023 to 31 March 2024.

Opinion

In our opinion, for the period 1 April 2023 to 31 March 2024:

- the Company has complied, in all material respects, with the Determination in relation to the Company's preparation of the Annual Compliance Statement; and
- as far as appears from an examination of the records, the information used in the preparation of the Annual Compliance Statement has been properly extracted from the Company's accounting and other records, sourced from its financial and non-financial systems.

Basis for Opinion

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

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

Board of Directors' Responsibility

The Board of Directors is responsible on behalf of the Company for the preparation of the Annual Compliance Statement in accordance with the Determination. This responsibility includes the identification of risks that threaten the compliance requirements identified above being met as well as the design, implementation and maintenance of internal control relevant to the Company's compliance with the Determination.

Our Independence and Quality Control

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

Other than in our capacity as independent auditor and the provision of other assurance services including the audit of financial statements and the audit of regulatory disclosure statements, we have no relationship with or interests in the Company. These services have not impaired our independence as auditor of the Company as required by the Determination.

The firm applies Professional and Ethical Standard 3: *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, which requires the firm to design, implement and operate a system of quality management including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our Responsibility

Our responsibility is to express an opinion on whether the Company has complied, in all material respects, with the Determination in relation to the preparation of the Annual Compliance Statement for the specified period.

SAE 3100 (Revised) and ISAE (NZ) 3000 (Revised) require that we plan and perform our procedures to obtain reasonable assurance that the Company has complied, in all material respects, with the Determination in preparing its Annual Compliance Statement for the specified period.

Deloitte.

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

In making those risk assessments, we consider 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. A reasonable assurance engagement also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates, as well as evaluating the overall presentation of the Annual Compliance Statement.

Our procedures included:

- examining, on a sample basis, evidence relevant to the amounts and disclosures contained on pages 3 to 17 of the Annual Compliance Statement in relation to the Default Price Path Compliance Information and Quality Compliance Information set out in Clauses 8 and 9 of the Determination respectively;
- assessing significant estimates and judgements, if any, made by the Company in the preparation of the Annual Compliance Statement;
- assessing whether the basis of preparation of the Annual Compliance Statement has been adequately disclosed;
- assessing whether the wash-up amount set out in Clause 8.6 of the Determination, is in accordance with schedule 1.6 of the Determination and assessing it against the amounts and disclosures contained on pages 3 to 17 of the Annual Compliance Statement;
- assessing whether the quality incentive adjustment set out in Schedule 4 of the Determination, is in accordance with Schedule 4 of the Determination and assessing it against the amounts and disclosures contained on pages 3 to 17 of the Annual Compliance Statement; and
- ensuring that the information used in preparing the Annual Compliance Statement has been properly extracted from the Company's accounting and other records, sourced from its financial and non-financial systems.

These procedures have been undertaken to form an opinion as to whether the Company has complied, in all material respects, with the Determination in preparing the Annual Compliance Statement for the period 1 April 2023 to 31 March 2024.

Inherent Limitations

Because of the inherent limitations of an assurance engagement, together with the inherent limitations of any system of internal control, it is possible that fraud, error or non-compliance may occur and not be detected. As the procedures performed for this engagement are not performed continuously throughout 1 April 2023 to 31 March 2024 and the procedures performed in respect of the Company's compliance with the Determination are undertaken on a test basis, our assurance engagement cannot be relied on to detect all instances where the Company may not have complied with the Determination. We did not examine every transaction, adjustment or event underlying the Compliance Statement nor do we guarantee complete accuracy of the Annual Compliance Statement. We also did not evaluate the security and controls over the electronic publication of the Compliance Statement. The opinion expressed in this report has been formed on the above basis.

Use of Report

This report is provided solely for your exclusive use and solely for the purpose of complying with Clause 11.5(e) of the Determination. However, we understand that a copy of this report has been requested by the Commerce Commission solely for the purpose above. We agree that a copy of our report may be provided to the Commerce Commission. This report is not to be used for any other purpose. We accept or assume no duty, responsibility or liability to any party, other than you, in connection with the report or this engagement including without limitation, liability for negligence in relation to the opinion expressed in our report.

Deloitte Limited

Deloitte Limited
Auckland, New Zealand
22 August 2024

7. Appendices

The following list of appendices provides further information supporting this compliance statement.

Attachment reference	Information provided
A – Price and actual quantities for the assessment period	Details prices and corresponding actual quantities for each tariff group across Powerco’s Eastern and Western networks. The product of prices and actual quantities is Powerco’s actual revenue from prices for the assessment period in section 2 of this document.
B – Commentary on major event days	Provides further detail on reliability and major event days.
C – Compliance statement references	Notes the compliance requirements from the Determination and where they are evidenced in this Statement.

Attachment A – Prices and actual quantities for the assessment period

Western Network			Overall Prices FY24 (Prices 1 April 2023 to 31 March 2024)									
Tariff Group	Network Group	Tariff Description	Fixed Charges				Variable Charges					
			ICP \$/day	CT/VT Charge (\$/day)	ABP (\$/AMD)	ABP (\$/AMD)	Uncontrolled \$/kWh	Night \$/kWh	Day Rate \$/kWh	On Peak Uncontrolled \$/kWh	\$/kVAr	Non-ICP Fixed (\$/day)
			FDC	CT/VT	*DIST*	*TRAN*	24UC	ERN	ERD	ERP	PFC	
Residential+Small Commercial												
E1C	A	Controlled	0.30					0.0651	0.0651	0.1339		
E1UC	A	Uncontrolled	0.45					0.0651	0.0651	0.1339		
E1C	B	Controlled	0.30					0.0887	0.0887	0.1520		
E1UC	B	Uncontrolled	0.45					0.0887	0.0887	0.1520		
Medium Commercial												
E100	A	100kVA < 300kVA	9.10	4.5400	0.3948	0.0301	0.0172				7.0000	
E100	B	100kVA < 300kVA	9.10	4.5400	0.4949	0.0285	0.0172				7.0000	
E100	C	100kVA < 300kVA	9.10	4.5400	0.5577	0.0834	0.0172				7.0000	
E100	D	100kVA < 300kVA	9.10	4.5400	0.5792	0.2032	0.0172				7.0000	
E100	E	100kVA < 300kVA	9.10	4.5400	0.3825	0.0321	0.0172				7.0000	
E100	F	100kVA < 300kVA	9.10	4.5400	0.4352	0.0357	0.0172				7.0000	
E100	G	100kVA < 300kVA	9.10	4.5400	0.7937	0.0608	0.0172				7.0000	
E100	H	100kVA < 300kVA	9.10	4.5400	0.4302	0.0327	0.0172				7.0000	
E100	I	100kVA < 300kVA	9.10	4.5400	0.3545	0.0168	0.0172				7.0000	
E100	J	100kVA < 300kVA	9.10	4.5400	0.5407	0.0790	0.0172				7.0000	
Large Industrial												
E300X	*	Individual ICP prices	201.91								7.0000	
SPECIAL	*	Individual ICP prices	865.48								7.0000	
BASEPOWER		Non-ICP Based										1.5908

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Western Network			Quantities FY24 (1 April 2023 to 31 March 2024)											
Tariff Group	Network Group	Tariff Description	Fixed Volumes					Variable Charges - kWh						
			ICP Days	ICPs (Average)	CT/VTs	AMD	AMD	kWh Uncontrolled	kWh Nite Only	kWh Day	kWh On Peak	kVAr Demand pa	Non-ICP Days	
			FDC	FDC	CT/VT	*DIST*	*TRAN*	24UC	ERN	ERD	ERP	PFC		
Residential + Small Commercial														
E1C	A	Controlled	18,608,097	50,842					109,705,452	211,003,334	135,580,702			
E1UC	A	Uncontrolled	26,813,483	73,261					158,080,929	304,046,906	195,366,074			
E1C	B	Controlled	8,681,537	23,720					61,897,030	104,979,810	66,142,515			
E1UC	B	Uncontrolled	11,673,255	31,894					83,227,177	141,156,582	88,935,685			
Medium Commercial														
E100	A	100kVA < 300kVA	25,203	69	1	7,428	7,428	23,444,821				6,771		
E100	B	100kVA < 300kVA	5,166	14		1,394	1,394	4,551,039				2,601		
E100	C	100kVA < 300kVA	732	2		103	103	137,404				32		
E100	D	100kVA < 300kVA	404	1		125	125	56,620				327		
E100	E	100kVA < 300kVA	7,686	21		2,311	2,311	8,044,034				2,370		
E100	F	100kVA < 300kVA	3,916	11		1,375	1,375	3,812,534				709		
E100	G	100kVA < 300kVA	1,830	5		950	950	2,504,220				710		
E100	H	100kVA < 300kVA	16,455	45		4,547	4,547	13,548,082				5,592		
E100	I	100kVA < 300kVA	43,860	120	1	12,727	12,728	38,239,214				11,741		
E100	J	100kVA < 300kVA	1,381	4		416	416	1,402,639				817		
Large Industrial														
E300X	*	Individual ICP prices		244				274,011,384				60,683		
SPECIAL	*	Individual ICP prices		45				378,341,891				25,573		
BASEPOWER		Non-ICP Based												4,392
Western Region Total			65,883,005	180,297	2			748,093,882	412,910,588	761,186,631	486,024,976	117,926	4,392	

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Western Network			Overall Revenue (FY24 Prices, FY24 Quantities)											
Tariff Group	Network Group	Tariff Description	Fixed	Daily	AMD	AMD	Variable	kWh Uncontrolled	kWh Nite Only	kWh Day	kWh On Peak	Demand	kVAr Demand pa	Total
Residential+ Small Commercial														
E1C	A	Controlled	5,582,429	5,582,429			39,032,398		7,141,825	13,736,317	18,154,256			44,614,827
E1UC	A	Uncontrolled	12,066,067	12,066,067			56,244,039		10,291,069	19,793,454	26,159,517			68,310,107
E1C	B	Controlled	2,604,461	2,604,461			24,855,638		5,490,267	9,311,709	10,053,662			27,460,099
E1UC	B	Uncontrolled	5,252,965	5,252,965			33,421,064		7,382,251	12,520,589	13,518,224			38,674,028
Medium Commercial														
E100	A	100kVA < 300kVA	1,386,205	231,009	1,073,362	81,834	403,251	403,251				47,398	47,398	1,836,854
E100	B	100kVA < 300kVA	314,143	47,011	252,586	14,546	78,278	78,278				18,204	18,204	410,625
E100	C	100kVA < 300kVA	30,829	6,661	21,024	3,144	2,363	2,363				226	226	33,419
E100	D	100kVA < 300kVA	39,500	3,676	26,520	9,304	974	974				2,292	2,292	42,766
E100	E	100kVA < 300kVA	420,622	69,943	323,529	27,151	138,357	138,357				16,588	16,588	575,567
E100	F	100kVA < 300kVA	272,598	35,636	218,998	17,965	65,576	65,576				4,962	4,962	343,136
E100	G	100kVA < 300kVA	313,763	16,653	275,969	21,140	43,073	43,073				4,969	4,969	361,804
E100	H	100kVA < 300kVA	920,087	149,741	715,928	54,419	233,027	233,027				39,146	39,146	1,192,260
E100	I	100kVA < 300kVA	2,130,299	400,788	1,651,248	78,264	657,714	657,714				82,185	82,185	2,870,198
E100	J	100kVA < 300kVA	106,949	12,567	82,350	12,032	24,125	24,125				5,718	5,718	136,793
Large Industrial														
E300X	*	Individual ICP prices	18,000,285	18,000,285								424,782	424,782	18,425,067
SPECIAL	*	Individual ICP prices	14,333,594	14,333,594								179,013	179,013	14,512,607
BASEPOWER		Non-ICP Based	6,987											6,987
Western Region Total			63,781,784				155,199,877	1,646,738	30,305,411	55,362,069	67,885,660	825,483	825,483	219,807,144

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Eastern Network			Overall Prices FY24 (Prices 1 April 2023 to 31 March 2024)											
Tariff Group	Network Group	Tariff Description	Fixed Charges		Variable Charges									
			ICP \$/day	Installed Capacity \$/kVA/Day	Uncontrolled \$/kWh	Controlled \$/kWh	All Inclusive \$/kWh	Night \$/kWh	On Peak Uncontrolled \$/kWh	Off Peak Uncontrolled \$/kWh	On Peak All Inclusive \$/kWh	Off Peak All Inclusive \$/kWh	Unmetered \$/kWh	\$/kVAr
			FDC	FDC*	24UC	CTRL	AICO	NITE	PEAK	OPFK	PKIN	OPIN	UNML	PFC
Residential+Small Commercial														
V05S	Valley	Low User	0.45		0.1033	0.0745	0.1033	0.0745	0.1673	0.0745	0.1673	0.0745	0.1291	
V06S	Valley	Standard User	1.11		0.0732	0.0444	0.0732	0.0444	0.1372	0.0444	0.1372	0.0444	0.1291	
V08	Valley	Holiday Home	1.25		0.0667	0.0349	0.0667	0.0349	0.1371	0.0349	0.1371	0.0349	0.1291	
T05S	Tauranga	Low User	0.45		0.0874	0.0614	0.0874	0.0614	0.1426	0.0614	0.1426	0.0614	0.1167	
T06S	Tauranga	Standard User	1.06		0.0595	0.0335	0.0595	0.0335	0.1147	0.0335	0.1147	0.0335	0.1167	
Unmetered Supply														
V01	Valley	Unmetered	0.45										0.1291	
V02	Valley	Streetlighting	0.00	0.1913										
T01	Tauranga	Unmetered	0.45										0.1167	
T02	Tauranga	Streetlighting	0.00	0.2023										
Medium Commercial			0.00											
V22	Valley	3ph60A > 199kVA	12.64		0.0694				0.1293	0.0425				7.0000
V28	Valley	200kVA > 299kVA	29.08		0.0628									7.0000
T22	Tauranga	3ph60A > 199kVA	11.98		0.0592	0.0363		0.0391	0.1140	0.0334				7.0000
T28	Tauranga	200kVA > 299kVA	27.08		0.0570									7.0000
Large Commercial / Industrial														
V40	Valley	Individual ICP prices	155.68											7.0000
V60	Valley	Individual ICP prices	1,085.74											7.0000
V601	Kinleith	Individual ICP prices	28,761.42											7.0000
T50	Tauranga	Individual ICP prices	130.73											7.0000
T601	Tauranga	Individual ICP prices	724.78											7.0000

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Eastern Network			Quantities FY24 (1 April 2023 to 31 March 2024)														
Tariff Group	Network Group	Tariff Description	Fixed Volumes			Variable Charges - kWh											
			ICP Days	ICPs (Average)	kVA Installed	kWh Uncontrolled	kWh Controlled	kWh All Inclusive	kWh Nite Only	kWh On Peak	kWh Off Peak	kWh All Inclusive On Peak	kWh All Inclusive Off Peak	kWh Unmetered	Distributed Generation	kVAr Demand pa	
			FDC	FDC	FDC*	24UC	CTRL	AICO	NITE	PEAK	OPFK	PKIN	OPIN	UNML	24DG	PFC	
Residential + Small Commercial																	
V05S	Valley	Low User	13,715,559	37,474		30,381,285	32,386,032	2,597,767	303,376	31,036,486	76,044,095	1,365,149	3,160,020	915	2,488,563		
V06S	Valley	Standard User	13,473,894	36,814		109,587,023	35,032,367	5,689,193	947,500	74,058,095	181,894,454	3,566,011	8,577,994	1,976	2,442,210		
V08	Valley	Holiday Home															
T05S	Tauranga	Low User	13,134,794	35,887		21,520,988	37,321,601	6,744,583	3,663,528	29,324,465	67,986,171	6,306,178	13,411,327	193	4,188,994		
T06S	Tauranga	Standard User	20,083,806	54,874		112,075,520	74,518,062	12,277,028	3,904,716	81,394,445	194,372,598	10,617,133	22,992,383	61,473	5,319,350		
Unmetered Supply																	
V01	Valley	Unmetered	68,578	187											628,539		
V02	Valley	Streetlighting	136,001	14	11,332										1,953,293		
T01	Tauranga	Unmetered	110,950	303											1,552,981		
T02	Tauranga	Streetlighting	173,022	14	14,419										3,211,515		
Medium Commercial																	
V22	Valley	3ph60A >199kVA	202,855	554		37,097,068				8,216,203	20,786,658				466,348		
V28	Valley	200kVA >299kVA	18,018	49		11,288,301											1,616
T22	Tauranga	3ph60A >199kVA	270,239	738		35,996,372	91,178			7,667,391	18,199,109				189,215		
T28	Tauranga	200kVA >299kVA	54,852	150		34,417,445									1,309		7,927
Large Commercial / Industrial																	
V40	Valley	Individual ICP prices		90		64,761,347											21,843
V60	Valley	Individual ICP prices		29		315,988,241											24,475
V601	Kinleith	Individual ICP prices		1		277,510,317											
T50	Tauranga	Individual ICP prices		233		172,117,570											37,131
T601	Tauranga	Individual ICP prices		37		210,173,448											23,042
Eastern Region Total			61,442,568	167,451	25,751	1,432,914,923	179,349,240	27,308,571	8,819,119	231,697,086	559,283,085	21,854,472	48,141,724	7,410,886	15,095,989	116,033	

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Eastern Network			Overall Revenue (FY24 Prices, FY24 Quantities)														
Tariff Group	Network Group	Tariff Description	Fixed	Daily	Variable	kWh Uncontrolled	kWh Controlled	kWh All Inclusive	kWh Nite Only	kWh On Peak	kWh Off Peak	kWh All Inclusive On Peak	kWh All Inclusive Off Peak	kWh Unmetered	Demand	kVAr Demand pa	Total
Residential + Small Commercial																	
V05S	Valley	Low User	6,172,002	6,172,002	17,163,715	3,138,387	2,412,759	268,349	22,602	5,192,404	5,665,285	228,389	235,422	118			23,335,717
V06S	Valley	Standard User	14,956,022	14,956,022	29,142,984	8,021,770	1,555,437	416,449	42,069	10,160,771	8,076,114	489,257	380,863	255			44,099,007
V08	Valley	Holiday Home															
T05S	Tauranga	Low User	5,910,657	5,910,657	15,065,656	1,880,934	2,291,546	589,477	224,941	4,181,669	4,174,351	899,261	823,455	23			20,976,314
T06S	Tauranga	Standard User	21,288,834	21,288,834	27,868,769	6,668,493	2,496,355	730,483	130,808	9,335,943	6,511,482	1,217,785	770,245	7,174			49,157,603
Unmetered Supply																	
V01	Valley	Unmetered	30,860	30,860	81,144									81,144			112,005
V02	Valley	Streetlighting	793,428	793,428													793,428
T01	Tauranga	Unmetered	49,928	49,928	181,233									181,233			231,160
T02	Tauranga	Streetlighting	1,067,576	1,067,576													1,067,576
Medium Commercial																	
V22	Valley	3ph60A >199kVA	2,564,087	2,564,087	4,520,324	2,574,537				1,062,355	883,433						7,084,412
V28	Valley	200kVA >299kVA	523,963	523,963	708,905	708,905									11,310	11,310	1,244,179
T22	Tauranga	3ph60A >199kVA	3,237,463	3,237,463	3,616,228	2,130,985	3,310			874,083	607,850						6,853,691
T28	Tauranga	200kVA >299kVA	1,485,392	1,485,392	1,961,794	1,961,794									55,486	55,486	3,502,673
Large Commercial / Industrial																	
V40	Valley	Individual ICP prices	5,136,743	5,136,743											152,903	152,903	5,289,646
V60	Valley	Individual ICP prices	11,673,049	11,673,049											171,322	171,322	11,844,372
V601	Kinleith	Individual ICP prices	10,526,678	10,526,678													10,526,678
T50	Tauranga	Individual ICP prices	11,147,208	11,147,208											259,915	259,915	11,407,123
T601	Tauranga	Individual ICP prices	9,941,830	9,941,830											161,296	161,296	10,103,127
Eastern Region Total			106,505,721		100,310,754	27,085,806	8,759,408	2,004,758	420,419	30,807,224	25,918,515	2,834,692	2,209,985	269,947	812,234	812,234	207,628,709

Attachment B – Commentary on major event day

16-18 September 2023

Significant gale force winds impacted the Powerco network between 16th and 18th September resulting in wide scale disruption.

Table 19: Details of the SAIDI major event day

Start Time & Date		End Time & Date		SAIDI Value Before normalisation	SAIDI Value after normalisation
16 September 2023	23:30	18 September 2023	12:00	11.202	3.931
Main Locations	Powerco Western Network - Wairarapa, Manawatu, Whanganui and Taranaki				
ICPs Affected	11,256				
Main Equipment	Distribution Lines				
How Powerco Responded	<p>Powerco and Downer provided additional fault response crew to the predicted areas.</p> <p>Additional control and NOC staff were rostered to manage the increased volume of faults predicted and worked to maintain and restore the network during the event.</p> <p>Planned work in affected areas was cancelled where crews deemed it unsafe to complete the work.</p>				
Prevention and future improvements	<p>Preventative actions are persistently applied through the business with renewal and replacement of hardware and material projects.</p> <p>The Powerco reliability team is well established to review and take appropriate actions for the worst performing feeders, identify issues through a robust detailed patrol and repair.</p> <p>Operations perform daily fault reviews and investigate the higher value SAIDI outages and look for improvements across the whole job i.e. network performance, vegetation, protection failure, system constraints, decisions, behaviours and process.</p> <p>We regularly educate the business and contractors to utilise the available resources and tools to help them make smarter and efficient decisions.</p>				

Attachment C – Compliance statement references

The following tables reference the Determination requirements and provide guidance on the section of this Statement that meets the specified requirements.

Table C1: Wash-up amount calculation

Determination clause	Determination requirement	Compliance statement section
8.6	Powerco must calculate the wash-up amount for each assessment period using the methodology specified in Schedule 1.6.	2

Table D2: Quality path summary

Determination clause	Determination requirement	Compliance statement section
9.2(a)	the sum of Powerco’s planned SAIDI assessed values for the DPP regulatory period, being the sum accumulated for all five assessment periods of the DPP regulatory period, must not exceed the planned accumulated SAIDI limit specified in paragraph (1) of Schedule 3.1 or, where applicable, the adjusted planned accumulated SAIDI limit; and	3.1
9.2(b)	the sum of Powerco’s planned SAIFI assessed values for the DPP regulatory period, being the sum accumulated for all five assessment periods of the DPP regulatory period, must not exceed the planned accumulated SAIFI limit specified in paragraph (1) of Schedule 3.1 or, where applicable, the adjusted planned accumulated SAIFI limit.	
9.8(a)	Powerco’s unplanned SAIDI assessed value for unplanned interruptions for the assessment period must not exceed the unplanned SAIDI limit specified in paragraph (1) of Schedule 3.2; and	3.2
9.8(b)	Powerco’s unplanned SAIFI assessed value for unplanned interruptions for the assessment period must not exceed the unplanned SAIFI limit specified in paragraph (1) of Schedule 3.2.	

Table D3: Annual compliance statement

Determination clause	Determination requirement	Compliance statement section
An annual Compliance Statement must be provided to the Commission consisting of:		
11.5(a)(i)	State whether or not Powerco has – complied with the requirements to calculate the wash-up amount in clause 8.6 for the assessment period and	1
11.5(a)(ii)	Complied with the quality standards in clause 9 for the assessment period;	1
11.5(b)	State the day on which the statement was prepared;	1
11.5(c)	State whether or not Powerco has entered into any agreement with another EDB or Transpower for an amalgamation, merger, major transaction or transfer in the assessment period;	1
11.5(d)	Include a certificate in the form set out in Schedule 7, signed by at least one director of Powerco; and	5
11.5(e)	Be accompanied by an assurance report meeting the requirements in Schedule 8, in respect of all information contained in the ‘annual compliance statement’.	6
11.6(a)	Details of the wash-up amount calculation as specified in clause 8.6, together with supporting information for all components of the calculation;	2 and Attachment A
11.6(b)	Actions taken to mitigate any non-compliance with clause 9 and Schedules 3.1-3.3 and to prevent similar non-compliance in future assessment periods;	N/a
11.6(c)	For the planned interruptions reliability assessment cap specified in clause 9.2, the planned SAIDI assessed value, planned SAIFI assessed value, planned SAIDI accumulated limit and planned SAIFI accumulated limit for the assessment period, and any supporting calculations (including those in Schedule 3.1);	N/a
11.6(d)	For the annual unplanned interruptions reliability assessment specified in clause 9.8, the unplanned SAIDI assessed value, unplanned SAIFI assessed value, unplanned SAIDI limit, unplanned SAIFI limit, SAIDI unplanned boundary value and SAIFI unplanned boundary value for the assessment period, and any supporting calculations (including those in Schedule 3.2);	N/a

Determination clause	Determination requirement	Compliance statement section
11.6(e)	For the quality incentive adjustment, SAIDI planned interruption cap, SAIDI unplanned interruption cap, SAIDI planned interruption collar, SAIDI unplanned interruption collar, SAIDI planned interruption target, SAIDI unplanned interruption target and incentive rate for the assessment period, and any supporting calculations (including those in Schedule 4);	3.4
11.6(f)	A description of the policies and procedures which the non-exempt EDB has used for capturing and recording Class B interruptions and Class C interruptions, and for calculating planned SAIDI assessed values and unplanned SAIDI assessed values and planned SAIFI assessed values and unplanned SAIFI assessed values for the assessment period;	3.5
11.6(g)(i-xii)	Information relating to each SAIDI major event within the assessment period,	3.2, 3.3 and Attachment B
11.6(h)(i-xii)	Information relating to each SAIFI major event within the assessment period,	

