Firstlightnetwork®

Default Price-Quality Path Annual Compliance Statement

Assessment Period

1 April 2022 – 31 March 2023

7 July 2023

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1. Introduction

Firstlight Network (previously known as Eastland Network) is subject to price-quality regulation under Part 4 of the Commerce Act 1986. The Commerce Commission has set a Default Price-Quality Path (DPP) which applies to Eastland Network from 1 April 2020.

This annual compliance statement is published in accordance with clause 11.4 of the 2020 DPP Determination, and applies to the second assessment period, commencing 1 April 2022 and ending 31 March 2023.

2. Date prepared

This statement was prepared on 7 July 2023.

3. Wash-up amount

3.1 Statement of compliance

As demonstrated in Table 1 in Section 3.2, and consistent with clause 8.6 of the 2020 DPP Determination Firstlight Network has complied with the wash-up amount calculation for the third assessment period.

3.2 Wash-up amount calculation

Table 1

Wash-up amount RY23		
Term	Description	Value ($000)
Actual allowable revenue (AAR)	*Sum of actual net allowable revenue, actual pass-through and recoverable costs, pass-through balance and revenue wash-up draw down amount*	32,409
Actual revenue (AR)	*Sum of actual revenue from prices plus other regulated income*	30,310
Revenue foregone (RV)	*Actual net allowable revenue x (revenue reduction percentage - 20%) when revenue reduction percentage is greater than 20%, otherwise nil*	-
Wash-up amount	*AAR - AR - RV*	**2,099**

Further information supporting actual allowable revenue is included in Section 3.2.1.

Further information supporting actual revenue is included in Section 3.2.2.

Further information supporting revenue foregone is included in Section 3.2.3.

3.2.1 Wash-up amount calculation

Table 2 below shows the actual allowable revenue for the assessment period consistent with Schedule 1.6 of the 2020 DPP Determination. Below is also a CPI adjustment calculation used to calculate the Actual net allowable revenue.

Table 2

Actual allowable revenue RY23		
Term	Description	Value ($000)
Actual net allowable revenue previous ($ANAR_{previous}$)	*$ANAR_{previous}$ is the actual net allowable revenue of the previous assessment period*	25,301
ΔCPI_t	*is the dervied change in CPI to be applied for the assessment period*	7.10%
X	*X Factor is the annual rate of change specified in Schedule 1.2 of the Determination*	0.00%
Actual net allowable revenue (ANAR)	*ANAR for the third assessment period is the amount calculated using the formula ANARprevious * (1 + ΔCPIt) * ((1 - X)*	27,097
Actual pass-through costs	*Sum of all pass-through costs that were incurred or approved by the Commission in the assessment period*	408
Actual recoverable costs	*Sum of all recoverable costs that were incurred or approved by the Commission in the assessment period*	5,248
Opening wash-up account balance	*For the third to fifth assessment period of the DPP regulatory period, the closing wash-up account balance of the previous assessment period*	(344)
Total actual allowable revenue (AAR)	*Actual net allowable revenue + actual pass-through costs and actual recoverable costs – (pass-through balance x (1 + 67* th percentile estimate of post-tax WACC))	**32,409**

ΔCPI_{2023}			
Denominator		Numerator	
$CPI_{Jun2021}$	1082	$CPI_{Jun2022}$	1161
$CPI_{Sep2021}$	1106	$CPI_{Sep2022}$	1186
$CPI_{Dec2021}$	1122	$CPI_{Dec2022}$	1203
$CPI_{Mar2022}$	1142	$CPI_{Mar2023}$	1218
ΔCPI_{2023}	**7.10%**		

Further information supporting actual pass-through costs, actual recoverable costs and the pass-through balance is included in Appendix A.

3.2.2 Actual revenue

Table 3 below shows actual revenue for the assessment period consistent with clause 4.2 of the 2020 DPP Determination.

Table 3

Actual revenue RY23		
Term	Description	Value ($000)
Actual revenue from prices	*Actual prices between 1 April 2022 and 31 March 2023 multiplied by actual quantities for the assessment period*	29,963
Other regulated income	*Other income associated with supply of electricity distribution services*	348
Total actual revenue (AR)	*Sum of actual revenue from prices plus other regulated income*	**30,310**

Further information supporting actual revenue from prices is included in Appendix B.

3.2.3 Revenue foregone.

Table 4 below shows the revenue foregone consistent with clause 4.2 of the 2020 DPP Determination.

Table 1

Revenue foregone RY23		
Term	Description	Value ($000)
Actual net allowable revenue (ANAR)	*Amount specified as forecast net allowable revenue for the third assessment period*	27,097
Revenue reduction percentage (RRP)	*1 - (actual revenue from prices / forecast revenue from prices)*	0.52%
Revenue foregone (RV)	*Actual net allowable revenue x (RRP-20%) when RRP is greater than 20%, otherwise nil*	**-**

4. Quality standards

4.1 Statement of compliance with planned interruptions quality standards

Firstlight Network is subject to a planned accumulated SAIDI limit and a planned accumulated SAIFI limit which are assessed for the DPP regulatory period as stated in clause 9.2 of the 2020 DPP Determination.

Table 5 and Table 6 below show the planned accumulated SAIDI and SAIFI limits for Firstlight Network for the DPP regulatory period and the planned SAIDI and SAIFI assessed values for the third assessment period.

Table 5

Planned interruptions quality standard - SAIDI	
Sum of planned SAIDI assessed values ≤ Planned accumulated SAIDI limit	
Planned accumulated SAIDI limit	1,290.68
Planned SAIDI assessed value for the third assessment period	303.19
Compliance result	**Compliant**

Table 6

Planned interruptions quality standard - SAIFI	
Sum of planned SAIFI assessed values ≤ Planned accumulated SAIFI limit	
Planned accumulated SAIFI limit	7.47
Planned SAIFI assessed value for the third assessment period	2.01
Compliance result	**Compliant**

Further information supporting planned SAIDI and SAIFI assessed values is included in Section 4.1.1.

4.1.1 Planned SAIDI and SAIFI assessed values.

Table 7 and Table 8 below show Eastland Network's planned SAIDI and SAIFI assessed values for the assessment period.

Table 7

Planned SAIDI assessed value RY23		
Term	Description	Value
Class B non-notified interruptions		31.84
Class B notified interruptions falling outside window		3.59
$SAIDI_B$	*Sum of Class B non-notified interruptions*	35.42
Class B notified interruptions falling inside window		103.29
Class B intended interruptions cancelled without notice		42.07
Class B intended interruptions cancelled with notice		-
$SAIDI_N$	*Sum of Class B notified interruptions*	145.36
Planned SAIDI assessed value	$SAIDI_B + (SAIDI_N /2)$	108.10

Table 8

Planned SAIFI assessed value RY23		
Term	Description	Value
Planned SAIFI assessed value	*Sum of Class B interruptions commencing within the assessment period*	0.7357

4.2 Statement of compliance with unplanned interruptions quality standards

As demonstrated in Table 9 below, and consistent with clause 9.7 of the 2020 DPP Determination, Firstlight Network has not complied with the unplanned interruptions SAIDI quality standard, but as shown in Table 10, complied with the unplanned interruptions SAIFI quality standard.

This statement is accompanied by Unplanned Interruption Report explaining the non-compliance with Unplanned SAIDI limit as per reporting requirements specified in clause 12.4 of the DPP Determination.

Table 9

Unplanned interruptions quality standard RY23 - SAIDI		
Unplanned SAIDI assessed value ≤ Unplanned SAIDI limit		
Unplanned SAIDI limit		219.46
Unplanned SAIDI assessed value	*Sum of normalised SAIDI values for Class C interruptions commencing within the assessment period*	295.44
Compliance result		**Not Compliant**

Table 10

Unplanned interruptions quality standard RY23 - SAIFI		
Unplanned SAIFI assessed value ≤ Unplanned SAIFI limit		
Unplanned SAIFI limit		3.1525
Unplanned SAIFI assessed value	*Sum of normalised SAIFI values for Class C interruptions commencing within the assessment period*	2.6402
Compliance result		**Compliant**

Information about policies, procedures and calculations for measuring planned and unplanned interruptions during the assessment period is in Appendix C.

4.2.1 Major events

Table 11 and Table 12 below show the SAIDI and SAIFI values attributed to major events which occurred during the assessment period.

Further information about major events is included in Appendix D.

Table 11

Unplanned SAIDI major events RY23			
Start	End	Pre-normalised unplanned SAIDI	Normalised unplanned SAIDI
13/04/2022 8:30	13/04/2022 17:30	52.610	2.734
13/04/2022 18:30	14/04/2022 18:00	49.093	2.861
10/01/2023 5:00	10/01/2023 21:00	78.393	2.665
10/01/2023 23:00	11/01/2023 15:00	14.121	1.970
13/02/2023 7:00	13/02/2023 16:00	42.939	2.430
13/02/2023 17:00	14/02/2023 8:30	924.170	5.890
14/02/2023 16:00	15/02/2023 11:30	20.039	0.641
15/02/2023 14:30	16/02/2023 14:00	14.448	1.107

Table 12

Unplanned SAIFI major events RY23			
Start	End	Pre-normalised unplanned	Normalised unplanned
19/08/2022 15:30	20/08/2022 11:00	0.8326	0.0151
10/01/2023 5:00	11/01/2023 0:30	0.1815	0.0383
13/02/2023 7:00	13/02/2023 20:30	0.2424	0.0610
13/02/2023 21:00	14/02/2023 19:30	1.0184	0.0551

4.3 Statement of compliance with extreme event standard

As demonstrated in Table 13 below, and consistent with clause 9.9 of the 2020 DPP Determination Firstlight Network has complied with the extreme event standard.

Table 13

Extreme event standard RY23	
Unplanned SAIDI value ≤ 120 minutes, and	
Number of extreme	Compliance result
-	Compliant

4.4 Quality Incentive Adjustment

Table 14 below shows Firstlight Network's quality incentive adjustment for the assessment period.

Table 14

Quality Incentive Adjustment RY23		
Term	Description	Value ($000)
SAIDI planned adjustment	$(SAIDI_{planned, target} - SAIDI_{planned, assessed}) \times 0.5 \times IR$	(31)
SAIDI unplanned adjustment	$(SAIDI_{unplanned, target} - SAIDI_{unplanned, assessed}) \times IR$	(128)
Total adjustment	*SAIDI planned adjustment + SAIDI unplanned adjustment*	(158)
Revenue at risk	*0.02 * ANAR*	542
Total penalty/reward		(158)
67th percentile estimate of post-tax WACC		4.23%
Quality incentive adjustment		**(172)**

Table 15 below shows Firstlight Network's quality incentive adjustment inputs consistent with Schedule 4 of the 2020 DPP Determination.

Table 15

Quality Incentive Adjustment Inputs RY23					
Term	Units	Value	Term	Units	Value
SAIDI planned interruption cap	minutes	258.14	SAIDI unplanned interruption cap	minutes	219.46
SAIDI planned interruption collar	minutes	-	SAIDI unplanned interruption collar	minutes	-
SAIDI planned interruption target	minutes	86.05	SAIDI unplanned interruption target	minutes	173.85
Planned SAIDI assessed value	minutes	108.10	Unplanned SAIDI assessed value	minutes	295.44
Incentive rate		2,797			
Actual net allowable revenue (ANAR)	$000	27,097			
SAIDI planned interruption target	minutes	86	SAIDI unplanned interruption target	minutes	174
Minimum of the planned SAIDI cap and assessed value	minutes	108	Minimum of the unplanned SAIDI cap and assessed value	minutes	219
Planned SAIDI subject to incentive	minutes	(22)	Unplanned SAIDI subject to incentive	minutes	(46)
Adjustment (IR x 0.5)	$	1,399	Adjustment (IR)	$	2,797
SAIDI planned adjustment	$000	(31)	SAIDI unplanned adjustment	$000	(128)

5. Transactions

Eastland Network changed ownership on 1 April 2023 from Eastland Group to First Gas Group and changed name to Firstlight Network. First Gas Group does not own or manage any other EDBs. Apart from the acquisition by First Gas Group, Firstlight Network has not entered into any agreements with another EDB or Transpower for an amalgamation, merger, major transaction or transfer in the assessment period.

6. Director's certification

A Director's certificate in the form set out in Schedule 7 of the 2020 DPP Determination is included as Appendix E.

7. Assurance report

An assurance report meeting the requirements of Schedule 8 of the 2020 DPP Determination is included in Appendix F.

Appendix A – Pass-through and recoverable costs

Pass-through costs

Table 16

Actual and forecast pass-through costs RY23				
Actual pass-through costs	Actual ($000)	Forecast ($000)	Forecast variance ($000)	Explanation for variances
Rates on system fixed assets	248	280	(32)	Based on FY21 Actuals + 2%CPI^2
Commerce Act levies	93	58	35	Based on FY21 Actuals + 2%CPI^2
Electricity Authority levies	51	62	(11)	Based on FY21 Actuals + 2%CPI^2
Utilities Disputes levies	16	15	0	
Total actual pass-through costs	**408**	**416**	**(8)**	

Recoverable cost

Table 17

Actual and forecast recoverable costs RY23				
Actual recoverable costs	Actual ($000)	Forecast ($000)	Forecast variance ($000)	Explanation for variances
IRIS incentive adjustment	(741)	(741)	-	
Transmission charges	5,582	5,582	0	
New investment contract charges	75	75	-	
System operator services charges			-	
Avoided transmission charges			-	
Distributed generation allowance	402	402	(0)	
Claw-back			-	
Catastrophic event allowance			-	
Extended reserves allowance			-	
Quality incentive adjustment	(17)	(17)	-	
Capex wash-up adjustment	(79)	(79)	-	
Reconsideration event allowance			-	
Quality standard variation engineers fee			-	
Urgent project allowance			-	
Fire and Emergency NZ levies	25	31	(7)	Forecast based on FY21 Actuals + 2%CPI^2
Innovation project allowance			-	
Total actual recoverable costs	**5,248**	**5,255**	**(7)**	

Pass through balance

Table 18

Opening wash-up account balance RY23		
Term	Description	Value ($000)
Wash-up amout for the previous assessment period	*Pass-through balance for the assessment period ending 31 March 2022*	(317)
Voluntary undercharging amount foregone for the previous assessment period	*An estimate of the pass-through balance as at 31 March 2022*	-
67th percentile estimate of post-tax WACC		4.23%
Opening wash-up account balance RY23	*(Wash-up amount - voluntary undercharging amount foregone) x (1 + 67th percentile estimate of post-tax WACC)^2*	**(344)**

Appendix B – Prices and quantities

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

Table 19

Actual revenue from prices RY23				
Price Category	Unit	Unit price	Actual quantity	Actual revenue ($000)
DOMLFC Fixed	$/day	0.3000	12,563	1,376
DOMLFC Peak	$/kWh	0.1770	7,489,432	1,326
DOMLFC Off Peak + Night	$/kWh	0.0957	14,993,459	1,435
DOMLFC Uncontrolled	$/kWh	0.1237	27,748,886	3,433
DOMLFC Controlled	$/kWh	0.1050	14,351,824	1,507
DOMSTD Fixed	$/day	2.0000	7,793	5,689
DOMSTD Peak	$/kWh	0.0778	7,872,514	612
DOMSTD Off Peak + Night	$/kWh	0.0309	16,740,634	517
DOMSTD Uncontrolled	$/kWh	0.0469	28,452,803	1,334
DOMSTD Controlled	$/kWh	0.0260	13,970,809	363
COM0050 Fixed	$/day	2.3000	4,626	3,884
COM0050 Peak	$/kWh	0.0674	2,254,627	152
COM0050 Off Peak + Night	$/kWh	0.0270	5,375,066	145
COM0050 Uncontrolled	$/kWh	0.0400	29,533,739	1,181
COM0050 Controlled	$/kWh	0.0241	2,293,669	55
COM0100 Fixed	$/day	8.3500	429	1,307
COM0100 Peak	$/kWh	0.0931	1,452,644	135
COM0100 Off Peak + Night	$/kWh	0.0373	3,915,210	146
COM0100 Uncontrolled	$/kWh	0.0524	18,027,532	945
COM0100 Controlled	$/kWh	0.0345	379,288	13
COM0300 Fixed	$/day	16.0000	116	678
COM0300 Morning Peak	$/kWh	0.0350	2,890,747	101
COM0300 Night	$/kWh	0.0154	2,511,762	39
COM0300 Evening Peak	$/kWh	0.0375	1,744,335	65
COM0300 Off Peak	$/kWh	0.0278	3,531,970	98
COM0300 Uncontrolled	$/kWh	0.0414	10,409,521	431
COM0500 Fixed	$/day	32.0000	23	267
COM0500 Morning Peak	$/kWh	0.0350	2,370,558	83
COM0500 Night	$/kWh	0.0154	2,622,475	40
COM0500 Evening Peak	$/kWh	0.0375	1,488,760	56
COM0500 Off Peak	$/kWh	0.0278	2,976,218	83
COM1000 Fixed	$/day	50.0000	24	435
COM1000 Morning Peak	$/kWh	0.0350	7,231,914	253
COM1000 Night	$/kWh	0.0154	8,212,224	126
COM1000 Evening Peak	$/kWh	0.0375	4,661,284	175
COM1000 Off Peak	$/kWh	0.0278	9,293,289	258
COM4500 Fixed	$/day	140.0000	3	153
COM4500 Morning Peak	$/kWh	0.0343	5,518,783	189

Table 19 continued

Actual revenue from prices RY23				
Price Category	Unit	Unit price	Actual quantity	Actual revenue ($000)
COM4500 Night	$/kWh	0.0150	6,986,258	105
COM4500 Evening Peak	$/kWh	0.0366	3,874,397	142
COM4500 Off Peak	$/kWh	0.0274	7,304,542	200
COM6500 Fixed	$/day	200.0000	1	73
COM6500 Morning Peak	$/kWh	0.0343	1,847,839	63
COM6500 Night	$/kWh	0.0150	1,503,001	23
COM6500 Evening Peak	$/kWh	0.0366	746,508	27
COM6500 Off Peak	$/kWh	0.0274	2,014,594	55
GEN6500 Fixed	$/day	104.9645	1	38
GEN6500 Uncontrolled	$/kWh	0.0309	98,971	3
OTH0003 Fixed	$/day	0.4918	81	15
OTH0003 Uncontrolled	$/kWh	0.1042	220,506	23
DUML Fixed	$/day	0.0608	5,146	114
DUML Uncontrolled	$/kWh	0.0729	1,471,197	107
STLGM Fixed	$/day	0.0665	242	6
STLGM Uncontrolled	$/kWh	0.0729	37,258	3
DOMLFC Peak - FY22 wash-ups	$/kWh	0.2074	1,125,379	233
DOMLFC Off Peak + Night - FY22 wash-ups	$/kWh	0.1157	3,168,076	367
DOMLFC Uncontrolled - FY22 wash-ups	$/kWh	0.1442	(4,927,455)	(711)
DOMLFC Controlled - FY22 wash-ups	$/kWh	0.0759	500,499	38
DOMSTD Peak - FY22 wash-ups	$/kWh	0.0897	1,635,489	147
DOMSTD Off Peak + Night - FY22 wash-ups	$/kWh	0.0359	4,099,045	147
DOMSTD Uncontrolled - FY22 wash-ups	$/kWh	0.0528	(5,565,791)	(294)
DOMSTD Controlled - FY22 wash-ups	$/kWh	0.0294	169,437	5
COM0050 Peak - FY22 wash-ups	$/kWh	0.0807	387,027	31
COM0050 Off Peak + Night - FY22 wash-ups	$/kWh	0.0323	1,023,114	33
COM0050 Uncontrolled - FY22 wash-ups	$/kWh	0.0474	(1,515,338)	(72)
COM0050 Controlled - FY22 wash-ups	$/kWh	0.0284	35,327	1
COM0100 Peak - FY22 wash-ups	$/kWh	0.1141	215,181	25
COM0100 Off Peak + Night - FY22 wash-ups	$/kWh	0.0457	562,938	26
COM0100 Uncontrolled - FY22 wash-ups	$/kWh	0.0643	(896,445)	(58)
COM0100 Controlled - FY22 wash-ups	$/kWh	0.0423	(14,216)	(1)
COM0300 Morning Peak - FY22 wash-ups	$/kWh	0.0429	(122,209)	(5)
COM0300 Night - FY22 wash-ups	$/kWh	0.0188	(12,787)	(0)
COM0300 Evening Peak - FY22 wash-ups	$/kWh	0.0460	(81,721)	(4)
COM0300 Off Peak - FY22 wash-ups	$/kWh	0.0340	(52,207)	(2)
COM0300 Uncontrolled - FY22 wash-ups	$/kWh	0.0507	(481,510)	(24)
COM4500 Morning Peak - FY22 wash-ups	$/kWh	0.0420	167,243	7
COM4500 Night - FY22 wash-ups	$/kWh	0.0184	263,430	5
COM4500 Evening Peak - FY22 wash-ups	$/kWh	0.0449	141,449	6
COM4500 Off Peak - FY22 wash-ups	$/kWh	0.0335	238,684	8
OTH0003 Uncontrolled - FY22 wash-ups	$/kWh	0.1276	(935)	(0)
DUML Uncontrolled - FY22 wash-ups	$/kWh	0.0872	(128,760)	(11)
STLGM Uncontrolled - FY22 wash-ups	$/kWh	0.0872	(869)	(0)
Tariff switches variances				(18)
Total actual revenue from prices				**29,963**

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

Table 20

Forecast revenue from prices RY23	
Total forecast revenue from prices	30,119

Appendix C - Policies and procedures for measuring planned and unplanned interruptions.

Following is a summary of policies and procedures used by Firstlight Network during the assessment period for capturing, recording and calculating class B and class C interruptions and planned and unplanned SAIDI and SAIFI assessed values.

Processing planned and intended interruptions.

1. Project manager issues a job to a network approved contractor.
2. The network approved contractor or project manager completes a work application form for a shutdown and emails it to the control room.
3. Work application is assessed and checked by the Network Control Manager or the Senior control room operator.
4. The information from the approved work application is entered into outage manager (an access database) as a new record.
5. When the data has been entered into outage manager an email is generated about the planned shutdown and sent to all retailers and MEPs.
6. Attached with the work application is a schematic plan of the work site which includes the transformers that will be affected by the shutdown. These transformers are entered into outage manager. This will generate a spreadsheet that will have a list of the number of ICPs (customers) affected. This is generated from ESRI/SAP system and these are the customers that are used as a basis for the customer minute calculations.
7. The outage is then entered onto the Firstlight Network website.
8. When the planned outage occurs, the switching is completed by the controller.
9. The controller completes an outage information form.
10. The outage information form is then checked by another controller to verify the information is correct.
11. The outage form is entered into the SAIDI/SAIFI model. This is an excel model that calculates SAIDI and SAIFI in accordance with the regulations set out in Electricity Distribution Services Default Price-Quality Path Determination 2020.
12. The Pricing and Regulatory Manager would review Pricing and Regulatory Analyst's input to avoid errors.
13. Regulatory and Pricing Analyst to check the monthly data. These checks include.

   a. Cross check with outage manager to ensure all outages entered into outage manager are in the SAIDI SAIFI model.
   b. Cross check with outages displayed on website to ensure all outages entered onto website are in the SAIDI SAIFI model.
   c. Cross check on notified interruptions with the control room email and website notification to ensure that they comply with the 10-day notification period.

14. The Regulatory and Pricing Analyst is to prepare monthly SAIDI SAIFI reports and present them to the Network team during the third week of the following month.
15. General Manager Networks to include the monthly SAIDI SAIFI reports in the monthly board papers.

Processing unplanned interruptions

1. An unplanned interruption occurs. The fault trips part of the network and this is alerted to the duty controller.
2. The controller completes the fault switching and the outage information form.
3. The outage form is then checked by another controller.
4. The outage form is entered into the SAIDI/SAIFI model. This is an excel model that calculates SAIDI and SAIFI in accordance with the regulations set out in Electricity Distribution Services Default Price-Quality Path Determination 2020
5. The Regulatory and Pricing Analyst is to prepare monthly SAIDI SAIFI reports and present them to the Network team during the third week of the following month.
6. General Manager Networks to include the monthly SAIDI SAIFI reports in the monthly board papers.

Numbers of customers used for switching sheets throughout the year.

At the start of each regulatory period (1 April) the information office is responsible for completing the customer numbers as at 1 April. These customer numbers will be the ones that are used for the regulatory period and are to be used while completing the outage data forms.

Firstlight Network understands that throughout the year there will be customers disconnected from the network or new customers connections. However, the effort

required to track these changes and update customer maps for customer minute purposes does not seem justified so Firstlight Network will only use this one set of customer numbers for the entire period.

ICP count

The average customer numbers that were generated from Gentrack (billing system) as part of billing are to be used.

The definition for a customer is: Means any person who is supplied with electricity but does not include any electricity generator or any electricity distributor or retailer.

This means that ICP status AC (= Active) is to be included in the average customer numbers for the year.

Appendix D – SAIDI and SAIFI major events

The below table 21 and 22 show the normalisation of the SAIDI and SAIFI major events that took place during the assessment period, consistent with Schedule 3.2 of the 2020 DPP Determination.

Below each table there is further information pertaining to the major event including location of the event, equipment involved, Firstlight Network's response and future step to avoid similar event occurring in the future.

Detailed analysis was only done for the main contributing outages to the SAIDI or SAIFI major event. An outage with more than 20% weighting towards the raw SAIDI or SAIFI number was included in the analysis.

Table 21

Normalisation of unplanned SAIDI major events RY23			
SAIDI unplanned boundary value			**13.10**
1/48th of the SAIDI unplanned boundary value	13/04/2022		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.27	13/04/2022 8:30	7.566	0.273
0.27	13/04/2022 9:00	7.919	0.273
0.27	13/04/2022 13:00	2.179	0.273
0.27	13/04/2022 13:30	3.679	0.273
0.27	13/04/2022 14:00	14.747	0.273
0.27	13/04/2022 14:30	1.756	0.273
0.27	13/04/2022 15:00	2.228	0.273
0.27	13/04/2022 16:00	0.005	0.005
0.27	13/04/2022 16:30	2.754	0.273
0.27	13/04/2022 17:00	4.486	0.273
0.27	13/04/2022 17:30	4.950	0.273
Total		**52.268**	**2.734**

SAIDI Major Event Information	
Cause	Wind and storms for serval days- Multiple faults. Major Weather event - April
Start Date	13/04/2022
Start Time	02:08 PM
End Date	15/04/2022
End Time	12:58 PM
SAIDI value of major event before replacement	6.1559
SAIDI value of major event	0.3207
Location of SAIDI major event	All Inland Feeder
Main equipment involved in SAIDI major event	11kV Feeder
How Eastland Network responded to the event	Major Wind event, limited resources, and attended multiple sites as soon as possible to ascertain the event, restore power if possible, and make it safe. Multiple trees through lines
Mitigating factors that may have prevented or minimised the major event	More resources are needed, as are larger forestry corridors.
Steps taken to mitigate the risk of future major events	Working more closely with Forestry owners to maintain better clearances.

SAIDI Major Event Information	
Cause	Severe wind caused clashing span and burnt down line(huge span). Major Storm event April.
Start Date	13/04/2022
Start Time	09:21 AM
End Date	18/04/2022
End Time	04:28 PM
SAIDI value of major event before replacement	4.9309
SAIDI value of major event	0.2560
Location of SAIDI major event	Waikura, Lottin point
Main equipment involved in SAIDI major event	11kV Conductor
How Eastland Network responded to the event	Feeder tripped, limited resources, remote location. All power was restored with the installation of a generator the next day.
Mitigating factors that may have prevented or minimised the major event	The original fault was due to a replacement conductor that was not fit for its intended purpose
Steps taken to mitigate the risk of future major events	Found original repairs done after 1st fault, not correct conductor size. Pole construction/configuration to be changed.

SAIDI Major Event Information	
Cause	Severe wind caused clashing span and burnt down line(huge span). Major April Weather event
Start Date	13/04/2022
Start Time	05:57 PM
End Date	15/04/2022
End Time	05:31 PM
SAIDI value of major event before replacement	5.0092
SAIDI value of major event	0.2590
Location of SAIDI major event	Whole of Tauwhareparae Rd
Main equipment involved in SAIDI major event	11kV Conductor
How Eastland Network responded to the event	Feeder Tripped at night, sent fault man the next day when light. It took 2 days to repair.
Mitigating factors that may have prevented or minimised the major event	More resources needed and larger forestry corridors.
Steps taken to mitigate the risk of future major events	Working more closely with Forestry owners to maintain better clearances.

SAIDI Major Event Information	
Cause	Trees came through line. April Weather event
Start Date	13/04/2022
Start Time	05:01 PM
End Date	14/04/2022
End Time	09:44 AM
SAIDI value of major event before replacement	8.6741
SAIDI value of major event	0.2347
Location of SAIDI major event	Raupunga
Main equipment involved in SAIDI major event	11kV Feeder Fault
How Eastland Network responded to the event	Feeder tripped at night. Patrolled the next day and found trees in line. Power Restored.
Mitigating factors that may have prevented or minimised the major event	More resources are needed and larger forestry corridors. Looking at sectionalising feeders with the installation of permanent generators.
Steps taken to mitigate the risk of future major events	Working more closely with Forestry owners to maintain better clearances. The ongoing investigation of generator solutions.

SAIDI Major Event Information	
Cause	High wind caused multiple trippings (x4), closed in rest day
Start Date	13/04/2022
Start Time	02:17 PM
End Date	14/04/2022
End Time	10:08 AM
SAIDI value of major event before replacement	5.3348
SAIDI value of major event	0.2791
Location of SAIDI major event	Tuai
Main equipment involved in SAIDI major event	11kV conductor clashing
How Eastland Network responded to the event	Waited for Wind to abate
Mitigating factors that may have prevented or minimised the major event	Weather Event can't be predicted
Steps taken to mitigate the risk of future major events	Line to be droned to find possible clashing spans

SAIDI Major Event Information	
Cause	Strong winds and Rain snapped pole and broke wires
Start Date	13/04/2022
Start Time	08:33 AM
End Date	14/04/2022
End Time	05:09 PM
SAIDI value of major event before replacement	7.8339
SAIDI value of major event	0.3958
Location of SAIDI major event	Rangitukia
Main equipment involved in SAIDI major event	11kV Pole/Conductor - J2202
How Eastland Network responded to the event	Feeder tripped; the road was closed, so we could not patrol. It took 24 hours to gain access to the site. Isolated tap offline and restored power to 50% of the consumers. Made temporary repairs and returned to fix them.
Mitigating factors that may have prevented or minimised the major event	Access was the biggest issued at this site as the road was impassable.
Steps taken to mitigate the risk of future major events	Pole testing regime in progress in the area, not completed yet. Prioritise pole testing locations based on fault data.

SAIDI Major Event Information	
Cause	Trees vs lines & poles-multi sites wind/storm battered area. Major April Storm
Start Date	13/04/2022
Start Time	02:09 PM
End Date	27/04/2022
End Time	04:22 PM
SAIDI value of major event before replacement	7.4967
SAIDI value of major event	0.3559
Location of SAIDI major event	Mata Rd
Main equipment involved in SAIDI major event	11kV Conductor - Multiple Faults
How Eastland Network responded to the event	Feeder tripped, limited resources could not get to site until next day. Isolated areas to be repaired and installed 1 x generator and used consumers generator. One area could not be supplied (21 customers), no more generators available.
Mitigating factors that may have prevented or minimised the major event	More resource needed and larger forestry corridors.
Steps taken to mitigate the risk of future major events	Working more closely with Forestry owners to maintain better clearances. Purchased additional 85kVA generator for this type of fault.

1/48th of the SAIDI unplanned boundary value	13/04/2022 to 14/04/2022		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.27	13/04/2022 18:30	37.705	0.273
0.27	13/04/2022 19:00	0.821	0.273
0.27	13/04/2022 20:00	0.005	0.005
0.27	13/04/2022 20:30	4.188	0.273
0.27	13/04/2022 21:30	0.022	0.022
0.27	13/04/2022 22:00	0.203	0.203
0.27	13/04/2022 22:30	1.328	0.273
0.27	14/04/2022 0:00	1.168	0.273
0.27	14/04/2022 0:30	1.762	0.273
0.27	14/04/2022 6:00	0.368	0.273
0.27	14/04/2022 8:30	0.031	0.031
0.27	14/04/2022 9:30	0.005	0.005
0.27	14/04/2022 10:00	0.001	0.001
0.27	14/04/2022 14:00	0.027	0.027
0.27	14/04/2022 14:30	0.043	0.043
0.27	14/04/2022 15:00	0.014	0.014
0.27	14/04/2022 15:30	0.416	0.273
0.27	14/04/2022 16:00	0.618	0.273
0.27	14/04/2022 17:00	0.045	0.045
0.27	14/04/2022 18:00	0.005	0.005
Total		**48.775**	**2.858**

SAIDI Major Event Information	
Cause	High winds caused wires to come down. April Storm Event
Start Date	13/04/2022
Start Time	06:32 PM
End Date	14/04/2022
End Time	03:09 PM
SAIDI value of major event before replacement	33.7845
SAIDI value of major event	1.9797
Location of SAIDI major event	Mahia area/Mahanga
Main equipment involved in SAIDI major event	11kV Conductor
How Eastland Network responded to the event	Feeder tripped and found conductor fell at the start of the feeder. The back-up generator at Mahia failed to close. The generator was repaired the next day and power was restored to the customer, and then the fault was fixed.
Mitigating factors that may have prevented or minimised the major event	Unusual fault on generator.
Steps taken to mitigate the risk of future major events	Updated generator maintenance plan.

1/48th of the SAIDI unplanned boundary value	10/01/2023		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.27	10/01/2023 5:00	1.164	0.273
0.27	10/01/2023 5:30	0.687	0.273
0.27	10/01/2023 8:00	18.918	0.273
0.27	10/01/2023 8:30	0.146	0.146
0.27	10/01/2023 11:00	0.062	0.062
0.27	10/01/2023 11:30	2.088	0.273
0.27	10/01/2023 14:30	0.333	0.273
0.27	10/01/2023 18:00	2.952	0.273
0.27	10/01/2023 19:00	14.418	0.273
0.27	10/01/2023 20:00	10.082	0.273
0.27	10/01/2023 21:00	27.036	0.273
Total		**77.885**	**2.664**

SAIDI Major Event Information	
Cause	3 different faults with tree through lines at all locations, Paremata Rd, Arakihi Rd and Tauwhareparae Rd. No Access biggest factor in the time it took to restore power. (Cyclone Hale)
Start Date	10/01/2023
Start Time	05:59 AM
End Date	16/01/2023
End Time	04:56 PM
SAIDI value of major event before replacement	19.6055
SAIDI value of major event	0.6706
Location of SAIDI major event	Tauwhareparae Rd
Main equipment involved in SAIDI major event	11kV Lines and Poles
How Eastland Network responded to the event	Feeder Tripped, Multiple Trippings, Faultman dispatched, found trees through the line and damaged Poles and Lines at 2 locations. Isolated areas and made repairs. Access to the top area prevented restoration for 3 days. When access became available found an additonal fault at the top.
Mitigating factors that may have prevented or minimised the major event	Out of our control, road access and no helicopter flying prevented earlier inspection and restoration.
Steps taken to mitigate the risk of future major events	Liaising with GDC, (roading corridor manager) about road condition and access.

1/48th of the SAIDI unplanned boundary value	10/01/2023 to 11/01/2023		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.27	10/01/2023 23:00	2.270	0.273
0.27	11/01/2023 0:30	9.067	0.273
0.27	11/01/2023 8:00	0.222	0.222
0.27	11/01/2023 9:30	0.989	0.273
0.27	11/01/2023 10:30	0.263	0.263
0.27	11/01/2023 13:00	0.259	0.259
0.27	11/01/2023 13:30	0.452	0.273
0.27	11/01/2023 14:00	0.013	0.013
0.27	11/01/2023 15:00	0.939	0.273
0.27	11/01/2023 17:00	0.369	0.273
0.27	11/01/2023 17:30	1.681	0.273
Total		**16.523**	**2.667**

SAIDI Major Event Information	
Cause	Found a tree broken, had fallen through a conductor
Start Date	11/01/2023
Start Time	12:42 AM
End Date	11/01/2023
End Time	06:06 AM
SAIDI value of major event before replacement	9.0668
SAIDI value of major event	1.4634
Location of SAIDI major event	Campion Area
Main equipment involved in SAIDI major event	11kV clashing of lines
How Eastland Network responded to the event	Sent fault man to patrol line next morning and closed feeder in. Found tree branch has clashed line. No fault man attended at the time because of Cyclone Hale.
Mitigating factors that may have prevented or minimised the major event	Under normal circumstances, we would have sent out a fault man the same night, but because of safety regarding the Cyclone no one was sent.
Steps taken to mitigate the risk of future major events	Safety policy will not be changing.

1/48th of the SAIDI unplanned boundary value	13/02/2023		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.27	13/02/2023 7:00	2.116	0.273
0.27	13/02/2023 8:00	0.034	0.034
0.27	13/02/2023 8:30	0.037	0.037
0.27	13/02/2023 9:00	0.038	0.038
0.27	13/02/2023 10:30	0.225	0.225
0.27	13/02/2023 11:00	1.794	0.273
0.27	13/02/2023 11:30	0.178	0.178
0.27	13/02/2023 12:00	0.255	0.255
0.27	13/02/2023 14:00	0.020	0.020
0.27	13/02/2023 14:30	3.375	0.273
0.27	13/02/2023 15:00	0.538	0.273
0.27	13/02/2023 15:30	2.595	0.273
0.27	13/02/2023 16:00	31.455	0.273
Total		**42.660**	**2.425**

SAIDI Information	
Cause	Tree through line, Cyclone Gabrielle
Start Date	13/02/2023
Start Time	04:21 PM
End Date	15/02/2023
End Time	04:31 PM
SAIDI value of major event before replacement	31.4537
SAIDI value of major event	1.7879
Location of SAIDI major event	Tiki Tiki
Main equipment involved in SAIDI major event	11kV Line - trees
How Eastland Network responded to the event	No access could not get to sites to isolate fault.
Mitigating factors that may have prevented or minimised the major event	Access prevented earlier restoration.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

1/48th of the SAIDI unplanned boundary value	13/02/2023 to 14/02/2023		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.27	13/02/2023 17:00	138.106	0.273
0.27	13/02/2023 17:30	9.593	0.273
0.27	13/02/2023 18:00	45.124	0.273
0.27	13/02/2023 18:30	0.393	0.273
0.27	13/02/2023 19:00	42.634	0.273
0.27	13/02/2023 19:30	35.365	0.273
0.27	13/02/2023 20:00	0.856	0.273
0.27	13/02/2023 20:30	132.099	0.273
0.27	13/02/2023 21:00	19.702	0.273
0.27	13/02/2023 21:30	85.624	0.273
0.27	13/02/2023 22:00	5.192	0.273
0.27	13/02/2023 22:30	127.961	0.273
0.27	13/02/2023 23:00	62.167	0.273
0.27	13/02/2023 23:30	54.633	0.273
0.27	14/02/2023 0:00	30.524	0.273
0.27	14/02/2023 2:00	42.943	0.273
0.27	14/02/2023 2:30	24.458	0.273
0.27	14/02/2023 3:00	38.674	0.273
0.27	14/02/2023 3:30	9.455	0.273
0.27	14/02/2023 5:30	0.621	0.273
0.27	14/02/2023 6:30	11.891	0.273
0.27	14/02/2023 8:30	0.158	0.158
Total		**918.174**	**5.889**

SAIDI Information	
Cause	Spans down - Cyclone Gabrielle
Start Date	17/02/2023
Start Time	10:43 PM
End Date	17/02/2023
End Time	07:10 PM
SAIDI value of major event before replacement	37.1577
SAIDI value of major event	0.2371
Location of SAIDI major event	Kanakania
Main equipment involved in SAIDI major event	Tree through 11kV line
How Eastland Network responded to the event	Fault at start of feeder with many customers. Could not access because of flooded bridge.
Mitigating factors that may have prevented or minimised the major event	Access prevented earlier restoration.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

SAIDI Information	
Cause	Cyclone Gabrielle- multiple poles down
Start Date	13/02/2023
Start Time	08:59 PM
End Date	1/03/2023
End Time	04:51 PM
SAIDI value of major event before replacement	59.1442
SAIDI value of major event	0.3792
Location of SAIDI major event	Te Arai
Main equipment involved in SAIDI major event	Poles and Conductor down - slips
How Eastland Network responded to the event	Multiple faults along feeder with multiple access issues.
Mitigating factors that may have prevented or minimised the major event	Access prevented earlier restoration.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

SAIDI Information	
Cause	Tree through line, install generator
Start Date	13/02/2023
Start Time	08:51 PM
End Date	22/02/2023
End Time	05:18 PM
SAIDI value of major event before replacement	32.7891
SAIDI value of major event	0.2094
Location of SAIDI major event	All Whatatutu
Main equipment involved in SAIDI major event	Tree through line
How Eastland Network responded to the event	Large spur line with no back feed. Installed generator at the site and went back to repair. Access was a problem for the generator and restoration. Needed good weather for a helicopter for contractors to be flown to the site for repairs.
Mitigating factors that may have prevented or minimised the major event	Access and bad weather, prevented earlier restoration.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

SAIDI Information	
Cause	Tree through lines, poles slips - Cyclone Gabrielle
Start Date	13/02/2023
Start Time	05:13 PM
End Date	13/03/2023
End Time	04:32 PM
SAIDI value of major event before replacement	53.5494
SAIDI value of major event	0.3432
Location of SAIDI major event	Tauwhareparae Rd
Main equipment involved in SAIDI major event	Tree through line - slips
How Eastland Network responded to the event	No access to site, could not install generator until fault could be fixed.
Mitigating factors that may have prevented or minimised the major event	Fault on spur line with many customers. Access prevented quick restoration. Could not install generator.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

SAIDI Information	
Cause	Slips and tress through the line - GAB
Start Date	13/02/2023
Start Time	12:28 PM
End Date	26/02/2023
End Time	09:33 AM
SAIDI value of major event before replacement	65.6721
SAIDI value of major event	0.4194
Location of SAIDI major event	Waipiro Bay
Main equipment involved in SAIDI major event	Broken 11kV Wires - tree through line
How Eastland Network responded to the event	Multiple faults in the area, including trees through line and slip on the State highway access road. Further faults at Makarika limited the ability to back feed from Ruatoria or Tokomaru Bay.
Mitigating factors that may have prevented or minimised the major event	Because of multiple feeder faults and access issues restoration took longer.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

SAIDI Information	
Cause	Slip brought pole down
Start Date	13/02/2023
Start Time	06:29 PM
End Date	14/03/2023
End Time	04:48 PM
SAIDI value of major event before replacement	47.8637
SAIDI value of major event	0.3070
Location of SAIDI major event	Anaura Bay
Main equipment involved in SAIDI major event	11kV Pole
How Eastland Network responded to the event	Multiple faults in the area, including slip on the Satae highway, had no road access. Further faults at Mata and Tolaga Bay limited the ability to back feed and no access due to bridge and back road being inaccessible.
Mitigating factors that may have prevented or minimised the major event	If we had road access power would have been restored earlier.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

SAIDI Information	
Cause	Trees through line - GAB
Start Date	13/02/2023
Start Time	05:25 PM
End Date	27/02/2023
End Time	01:26 PM
SAIDI value of major event before replacement	82.8524
SAIDI value of major event	0.4258
Location of SAIDI major event	Raupunga, Kotemaori, Putere
Main equipment involved in SAIDI major event	11kV wires down
How Eastland Network responded to the event	Trees through the line at the start of the Raunpunga Feeder. No access, lagre numbers because normal back feed (Frasertown) not available. Limited ability to restore power to everyone until fault was fixed. Access was not available for four days with large number of consumers off.
Mitigating factors that may have prevented or minimised the major event	If we had road access or back up feed had not failed and power would have been restored earlier.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

SAIDI Information	
Cause	Multiple faults, install jumpers on to 50kV line - GAB
Start Date	13/02/2023
Start Time	10:53 PM
End Date	18/02/2023
End Time	01:50 PM
SAIDI value of major event before replacement	41.6098
SAIDI value of major event	0.2669
Location of SAIDI major event	Frasertown
Main equipment involved in SAIDI major event	11kV multiple faults wires and poles down
How Eastland Network responded to the event	No access could not get to sites. Due to other faults unable to backfeed into area.
Mitigating factors that may have prevented or minimised the major event	Because of multiple feeder faults and access issues restoration took longer.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

SAIDI and SAIFI Information	
Cause	Cyclone Gabrielle caused conductor to clash
Start Date	13/02/2023
Start Time	10:46 PM
End Date	13/02/2023
End Time	11:31 PM
SAIDI value of major event before replacement	36.5036
SAIDI value of major event	0.2341
SAIFI value of major event before replacement	0.8112
SAIFI value of major event	0.0441
Location of SAIDI major event	All Gisborne & East Coast
Main equipment involved in SAIDI major event	110kV Wires clashing
How Eastland Network responded to the event	We initiated the network 110kV outage procedure by analysising the SCADA data from the fault. It was acertained it was a phase to phase on both circuits clashing. We could then close circuit back in within 45 minutes
Mitigating factors that may have prevented or minimised the major event	We have changed the phasing so the clashes are phase to phase and the circuit can be reclosed without patrolling. Reducing the outage time considerably.
Steps taken to mitigate the risk of future major events	Created the process above to minimise when this occurs as a result of extreme weather events.

SAIDI Information	
Cause	Trees through line, Cyclone Gabrielle
Start Date	13/02/2023
Start Time	11:34 AM
End Date	21/02/2023
End Time	05:40 PM
SAIDI value of major event before replacement	34.2953
SAIDI value of major event	0.2190
Location of SAIDI major event	Tiniroto
Main equipment involved in SAIDI major event	Tree through line and slips
How Eastland Network responded to the event	No access, could not get to sites. Due to other faults unable to backfeed into area.
Mitigating factors that may have prevented or minimised the major event	Because of multiple feeder faults and access issues restoration took longer.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

SAIDI and SAIFI Information	
Cause	Multiple feeder faults/tripping from mains & Gen including 50kV and 11kV
Start Date	13/02/2023
Start Time	05:21 PM
End Date	16/02/2023
End Time	05:06 PM
SAIDI value of major event before replacement	75.0459
SAIDI value of major event	0.481
SAIFI value of major event before replacement	0.0925
SAIFI value of major event	0.0144
Location of SAIDI major event	Kopuaroa, Eastcoast & Potaka
Main equipment involved in SAIDI major event	Tripped CB found nothing
How Eastland Network responded to the event	Because the 50kv line faulted, the coast was running on the generators, any feeder fault causes the generators to trip. This takes out a large number of customers because all feeders from the substation lose power. The process in not to reclose on the generator after a fault so it takes longer to restore as a patrol is necessary. Patrolled line and found nothing so restored power.
Mitigating factors that may have prevented or minimised the major event	The coast new tork was running off generators because of a 50kV fault.
Steps taken to mitigate the risk of future major events	Followed process, so it took the appropriate time to restore power, just had large numbers off.

SAIDI Information	
Cause	Poles down - Cyclone Gabrielle
Start Date	14/02/2023
Start Time	03:16 AM
End Date	2/03/2023
End Time	04:53 PM
SAIDI value of major event before replacement	38.6738
SAIDI value of major event	0.2480
Location of SAIDI major event	Matawai
Main equipment involved in SAIDI major event	Poles down
How Eastland Network responded to the event	Fault at start of feeder with many customers. Pole in flooded riverbank could not access immediately. Rediverted feed through 50kV line.
Mitigating factors that may have prevented or minimised the major event	Access prevented earlier restoration.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

1/48th of the SAIDI unplanned boundary value	14/02/2023 to 15/02/2023		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.27	14/02/2023 16:00	13.234	0.273
0.27	14/02/2023 19:30	0.083	0.083
0.27	15/02/2023 10:00	0.003	0.003
0.27	15/02/2023 10:30	0.009	0.009
0.27	15/02/2023 11:30	6.580	0.273
Total		**19.909**	**0.641**

SAIDI Information	
Cause	Trees through line - GAB
Start Date	13/02/2023
Start Time	05:25 PM
End Date	27/02/2023
End Time	01:26 PM
SAIDI value of major event before replacement	82.8524
SAIDI value of major event	0.4258
Location of SAIDI major event	Raupunga, Kotemaori, Putere
Main equipment involved in SAIDI major event	11kV wires down
How Eastland Network responded to the event	Trees through the line at the start of the Raunpunga Feeder. No access, large numbers because normal back feed (Frasertown) not available. Limited ability to restore power to everyone until fault was fixed. Access was not available for four days with large number of consumers off.
Mitigating factors that may have prevented or minimised the major event	If we had road access or back up feed had not failed and power would have been restored earlier.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

1/48th of the SAIDI unplanned boundary value	15/02/2023 to 16/02/2023		
	Half hour commencing	Raw SAIDI value for Class C interruption	Normalised SAIDI value for Class C interruption
0.27	15/02/2023 14:30	6.410	0.273
0.27	15/02/2023 23:00	4.670	0.273
0.27	16/02/2023 9:30	0.028	0.028
0.27	16/02/2023 13:30	2.989	0.273
0.27	16/02/2023 14:00	0.258	0.258
Total		**14.355**	**1.105**

SAIDI Information	
Cause	Car vs pole- Smashed it, tripped out feeder, isolated, repaired daylight
Start Date	15/02/2023
Start Time	11:12 PM
End Date	16/02/2023
End Time	03:09 PM
SAIDI value of major event before replacement	4.9278
SAIDI value of major event	0.3793
Location of SAIDI major event	Riverside Rd
Main equipment involved in SAIDI major event	11kV Pole
How Eastland Network responded to the event	Car Vs pole - major town feeder. Occurred late at night, not all restored until the pole was replaced the next day.
Mitigating factors that may have prevented or minimised the major event	The location of the fault made temporary restoration difficult. Could not restore power to all consumers overnight.
Steps taken to mitigate the risk of future major events	When the pole is due for replacement look at other options eg undergrounding.

SAIDI Information	
Cause	Wires down -GAB
Start Date	13/02/2023
Start Time	10:31 PM
End Date	16/02/2023
End Time	03:35 PM
SAIDI value of major event before replacement	9.1260
SAIDI value of major event	0.4933
Location of SAIDI major event	Mahia
Main equipment involved in SAIDI major event	11kV Wires
How Eastland Network responded to the event	Large spur line, no access to find fault, so prermanent generator not started until fault found.
Mitigating factors that may have prevented or minimised the major event	Access prevented earlier restoration.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

SAIDI Information	
Cause	Replair broken wire, replace broken pole GAB
Start Date	16/02/2023
Start Time	01:55 PM
End Date	20/02/2023
End Time	06:29 PM
SAIDI value of major event before replacement	2.9885
SAIDI value of major event	0.2300
Location of SAIDI major event	Morere
Main equipment involved in SAIDI major event	11kV wire and Pole
How Eastland Network responded to the event	Spur line with no back feed and access an issues. Could not restore until access could be gained on State Highway.
Mitigating factors that may have prevented or minimised the major event	If we had road access power would have been restored earlier.
Steps taken to mitigate the risk of future major events	This is a major weather event- Cyclone Gabrielle, caused multiple faults and limited access, which are beyond our control.

Table 22

Normalisation of unplanned SAIFI major events RY23			
SAIFI unplanned boundary value			**0.1765**
1/48th of the SAIFI unplanned boundary value	19/08/2022 to 20/08/2022		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.00	19/08/2022 15:30	0.8112	0.004
0.00	20/08/2022 6:30	0.0028	0.003
0.00	20/08/2022 10:30	0.0096	0.004
0.00	20/08/2022 11:00	0.0035	0.004
Total		**0.8272**	**0.015**

SAIFI Major Event Information	
Cause	Suspect caused extremely high wind gust Tuai Region
Start Date	19/08/2022
Start Time	03:34 PM
End Date	19/08/2022
End Time	03:47 PM
SAIFI value of major event before replacement	0.8112
SAIFI value of major event	0.0148
Location of SAIFI major event	All Gis Sub
Main equipment involved in SAIFI major event	Conductor Clashing
How Eastland Network responded to the event	33kV Line tripped - high winds. Restored power, held for 2 minutes and re tripped. Decided not to reclose again and went to start Mahia generator, which failed (later found to be a faulty fuel valve). Went to close W8816 to bring on Morere, it failed to close. Sent contractor from Gisborne to start generator and manually close W8816. When restoring power to Mahia via generator 2 x 11kV additonal faults occured while power was out. Jumper was off at W958 and Wires down by Opoutama. Repaired next day.
Mitigating factors that may have prevented or minimised the major event	An abnormal mechanical fault on the automated switch was not found. The generator failed to start.
Steps taken to mitigate the risk of future major events	Service the switch and reconfigure the generator valve. Patrolled line in light of day no faults found.

1/48th of the SAIFI unplanned boundary value	10/01/2023 to 11/01/2023		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.00	10/01/2023 5:00	0.0102	0.004
0.00	10/01/2023 5:30	0.0056	0.004
0.00	10/01/2023 8:30	0.0007	0.001
0.00	10/01/2023 11:00	0.0000	0.000
0.00	10/01/2023 11:30	0.0014	0.001
0.00	10/01/2023 14:30	0.0049	0.004
0.00	10/01/2023 18:00	0.0034	0.003
0.00	10/01/2023 19:00	0.0611	0.004
0.00	10/01/2023 20:00	0.0256	0.004
0.00	10/01/2023 21:00	0.0361	0.004
0.00	10/01/2023 23:00	0.0033	0.003
0.00	11/01/2023 0:30	0.0280	0.004
Total		**0.1803**	**0.035**

SAIFI Major Event Information	
Cause	Tree through 50kV line (Cyclone Hale)
Start Date	10/01/2023
Start Time	07:22 AM
End Date	13/01/2023
End Time	03:06 PM
SAIDI value of major event before replacement	0.0870
SAIDI value of major event	0.0132
Location of SAIDI major event	Tiki Tiki
Main equipment involved in SAIDI major event	50kV and 11kV lines
How Eastland Network responded to the event	50Kv tripped, got Ruatoria and Te Araroa generators running and power restored, Then the tree went through the 50kV line and dropped onto the 11kV line, tripping the Te Araroa generator. Then isolated lines to find fault, took a while to find fault as it occurred at 9 pm and didn't find till the next day and found a second fault on 11kV (tree online). Made repairs and put it back to normal.
Mitigating factors that may have prevented or minimised the major event	Resources, Trees and Cyclone Hale were contributing factors. Safety didn't allow faultman to start fault finding until next day.
Steps taken to mitigate the risk of future major events	Both trees were out of zone, and current regulations don't allow the legal right to cut. The location at the end of the network and getting resources there.

1/48th of the SAIFI unplanned boundary value	13/02/2023		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.00	13/02/2023 7:00	0.0085	0.004
0.00	13/02/2023 8:00	0.0043	0.004
0.00	13/02/2023 8:30	0.0012	0.001
0.00	13/02/2023 9:00	0.0019	0.002
0.00	13/02/2023 10:30	0.0026	0.003
0.00	13/02/2023 11:00	0.0000	0.000
0.00	13/02/2023 11:30	0.0022	0.002
0.00	13/02/2023 12:00	0.0020	0.002
0.00	13/02/2023 14:00	0.0003	0.000
0.00	13/02/2023 14:30	0.0300	0.004
0.00	13/02/2023 15:00	0.0081	0.004
0.00	13/02/2023 15:30	0.0002	0.000
0.00	13/02/2023 16:00	0.0121	0.004
0.00	13/02/2023 16:30	0.0071	0.004
0.00	13/02/2023 17:00	0.0557	0.004
0.00	13/02/2023 17:30	0.0036	0.004
0.00	13/02/2023 18:00	0.0026	0.003
0.00	13/02/2023 18:30	0.0120	0.004
0.00	13/02/2023 19:00	0.0255	0.004
0.00	13/02/2023 19:30	0.0074	0.004
0.00	13/02/2023 20:00	0.0074	0.004
0.00	13/02/2023 20:30	0.0462	0.004
Total		**0.2408**	**0.061**

SAIDI and SAIFI Information	
Cause	Multiple feeder faults/tripping from mains & Gen including 50kV and 11kV
Start Date	13/02/2023
Start Time	05:21 PM
End Date	16/02/2023
End Time	05:06 PM
SAIDI value of major event before replacement	75.0459
SAIDI value of major event	0.481
SAIFI value of major event before replacement	0.0925
SAIFI value of major event	0.0144
Location of SAIDI major event	Kopuaroa, Eastcoast & Potaka
Main equipment involved in SAIDI major event	Tripped CB found nothing
How Eastland Network responded to the event	Because the 50kv line faulted, the coast was running on the generators, any feeder fault causes the generators to trip. This takes out a large number of customers because all feeders from the substation lose power. The process in not to reclose on the generator after a fault so it takes longer to restore as a patrol is necessary. Patrolled line and found nothing so restored power.
Mitigating factors that may have prevented or minimised the major event	The coast new tork was running off generators because of a 50kV fault.
Steps taken to mitigate the risk of future major events	Followed process, so it took the appropriate time to restore power, just had large numbers off.

1/48th of the SAIFI unplanned boundary value	13/02/2023 to 14/02/2023		
	Half hour commencing	Raw SAIFI value for Class C interruption	Normalised SAIFI value for Class C interruption
0.00	13/02/2023 21:00	0.0031	0.003
0.00	13/02/2023 21:30	0.0356	0.004
0.00	13/02/2023 22:00	0.0210	0.004
0.00	13/02/2023 22:30	0.8282	0.004
0.00	13/02/2023 23:00	0.0107	0.004
0.00	13/02/2023 23:30	0.0061	0.004
0.00	14/02/2023 0:00	0.0050	0.004
0.00	14/02/2023 2:00	0.0058	0.004
0.00	14/02/2023 2:30	0.0224	0.004
0.00	14/02/2023 3:00	0.0153	0.004
0.00	14/02/2023 3:30	0.0037	0.004
0.00	14/02/2023 5:30	0.0019	0.002
0.00	14/02/2023 6:30	0.0398	0.004
0.00	14/02/2023 8:30	0.0028	0.003
0.00	14/02/2023 16:00	0.0031	0.003
0.00	14/02/2023 19:30	0.0072	0.004
Total		**1.0118**	**0.055**

SAIDI and SAIFI Information	
Cause	Cyclone Gabrielle caused conductor to clash
Start Date	13/02/2023
Start Time	10:46 PM
End Date	13/02/2023
End Time	11:31 PM
SAIDI value of major event before replacement	36.5036
SAIDI value of major event	0.2341
SAIFI value of major event before replacement	0.8112
SAIFI value of major event	0.0441
Location of SAIDI major event	All Gisborne & East Coast
Main equipment involved in SAIDI major event	110kV Wires clashing
How Eastland Network responded to the event	We initiated the network 110kV outage procedure by analysising the SCADA data from the fault. It was acertained it was a phase to phase on both circuits clashing. We could then close circuit back in within 45 minutes
Mitigating factors that may have prevented or minimised the major event	We have changed the phasing so the clashes are phase to phase and the circuit can be reclosed without patrolling. Reducing the outage time considerably.
Steps taken to mitigate the risk of future major events	Created the process above to minimise when this occurs as a result of extreme weather events.

Appendix E – Director's certificate

We Mark Adrian Ratcliffe and Fiona Ann Oliver, being directors of Firstlight Network Limited certify that, having made all reasonable enquiry, to the best of our knowledge and belief, the attached Annual Compliance Statement of Firstlight Network Limited, and related information, prepared for the purposes of the *Electricity Distribution Services Default Price-Quality Path Determination 2020* has been prepared in accordance with all relevant requirements.

Director: Mark Adrian Ratcliffe

Director: Fiona Ann Oliver

25 August 2023

Date

25 August 2023

Date

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

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Independent Assurance Report to the Directors of Firstlight Network Limited on the Annual Compliance Statement for the Assessment Period Ended 31 March 2023 as required by the Electricity Distribution Services Default Price-Quality Path Determination 2020 (Consolidated 20 May 2020)

The Auditor-General is the auditor of Firstlight Network Limited (the company) (formerly "Eastland Network Limited") . 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 Annual Compliance Statement on pages 4 to 12 and 13 to 40 for the assessment period ended on 31 March 2023 has been prepared, in all material respects, in compliance with the Electricity Distribution Services Default Price-Quality Path Determination 2020 (consolidated 20 May 2020) (the Determination).

Opinion

In our opinion, in all material respects:

- as far as appears from our examination, the information used in the preparation of the Annual Compliance Statement has been properly extracted from the company's accounting and other records, sourced from its financial and non-financial systems; and
- the company has complied with clauses 11.5 and 11.6 of the Determination in preparing the Annual Compliance Statement for the assessment period ended 31 March 2023.

Basis for opinion

We conducted our engagement in accordance with the Standard on Assurance Engagements (SAE) 3100 (Revised) Compliance Engagements ("SAE 3100 (Revised)"), issued by the New Zealand Auditing and Assurance Standards Board. An engagement conducted in accordance with SAE 3100 (Revised) requires that we also 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.

Directors' responsibilities

The directors of the company are responsible for the:

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

Auditor's responsibilities

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

- as far as appears from our examination, the information used in the preparation of the Annual Compliance Statement has been properly extracted from the company's accounting and other records, sourced from its financial and non-financial systems; and
- the Annual Compliance Statement, for the assessment period ended 31 March 2023, has been prepared, in all material respects, in accordance with the requirements in clauses 11.5 and 11.6 of the Determination.

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

In relation to the wash-up amount set out in clause 8.6 of the Determination, our procedures included recalculation of the wash-up amount in accordance with schedule 1.6 of the Determination and assessing it against the amounts and disclosures contained on pages 4 to 7 of the Annual Compliance Statement.

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In relation to the quality standards in clause 9 of the Determination, our procedures included examination, on a test basis, of evidence relevant to the values and disclosures contained on pages 8 to 13 of the Annual Compliance Statement.

In relation to the quality incentive adjustment set out in Schedule 4 of the Determination, our procedures included recalculation of the quality incentive adjustment in accordance with Schedule 4 of the Determination and assessing it against the amounts and disclosures contained on pages 12 to 13 of the Annual Compliance Statement.

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

Inherent limitations

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

Restricted use

This report is provided solely for your exclusive use and solely for the purpose of 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, recited or referred to in any document, copied or made available (in whole or in part) to any other person without our prior written consent. 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.

Independence and quality control

We complied with the Auditor-General's:

- independence and other ethical requirements, which incorporate the requirements of Professional and Ethical Standard 1 International Code of Ethics for Assurance Practitioners (including International Independence Standards) (New Zealand) (PES 1) issued by the New Zealand Auditing and Assurance Standards Board; and
- quality management requirements, which incorporate Professional and Ethical Standard 3 Quality Management for Firms that perform Audits or Reviews of Financial Statements, or other Assurance or Related Services Engagements (PES 3) issued by the New Zealand Auditing and Assurance Standards Board. PES 3 requires our firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The Auditor-General, and his employees, Deloitte Limited and its partners and employees may deal with the company[1] 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[2], the assurance engagement on the Information Disclosures and the annual audit of the company's financial statements and performance information, we have no relationship with, or interests in, the company.[3]

Deloitte Limited

Brett Tomkins
Partner
for Deloitte Limited
On behalf of the Auditor-General
Auckland, New Zealand
25 August 2023